

List of Representations to Regulation 19(1) Consultation

LOCAL PLAN EXAMINATION DOCUMENT

October 2018



MAYOR OF LONDON

OPDC First Revised Draft Local Plan Consultation: List of Representations

OPDC consulted on the first revised draft Regulation 19 (1) Local Plan from the 29th June to the 11th September 2017, receiving 120 individual responses containing 2,880 individual comments.

This document presents all comments made as part of the Regulation 19 (1) consultation. Comments have been organised by the Local Plan Chapter or Supporting Study which they relate to, and within this by order of respondent/comment. The ‘Res. Ref’ column indicates the response reference number attributed to each individual response, while the “Com. Ref” column indicates the comment reference number which has been attributed to each individual comment.

This list of representations should be read alongside the list of the representations on the second revised draft Regulation 19 (2) Local Plan consultation which have been published as a separate document.

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

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Res. Ref.	Respondent Type	Name	Organisation	On behalf of
1	Community Group	Del Brenner	Regents Network	
2	Local Resident	Roy Chapman		
3	Local Resident	A. Anderson		
4	Local Resident	Michael Hangyal		
5	Local Resident	Susannah Abeyasekera		
6	Local Resident	Robert Covell		
7	Local Resident	Adrien Lafond		
8	Local Resident	Jamie Glazebrook		
9	Statutory Stakeholder	Ronan Torkildsen	Historic England	
10	Planning Consultant	Matt Hill	Maddox Planning Consultants	Culinary Quarter Ltd.
11	Strategic Partner	Sue Hardy	NHS Brent Clinical Commissioning Group (CCG)	
12	Statutory stakeholder	Liz Goodwin	London Waste and Recycling Board	
13	Strategic Partner	Paul Gilfedder	HS2 Ltd.	
14	Agent	Leonie Oliva	Deloitte LLP	Imperial College
15	Agent	Mark Underwood	Deloitte LLP	Diageo
16	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	
17	Strategic Partner	Steve Craddock	Canal & River Trust	
18	Strategic Partner		London Obesity Leadership Group	
19	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	
20	Agent	Adam Kindred	CBRE	Remavon
21	Agent	Jeremy Evershed	Montagu Evans	Boropex Holdings Limited
22	Interest Group	Ed Randall	Professional Land Research Group and Coalition for Economic Justice	
23	Local Authority	Muhammed Butt	London Borough of Brent	
24	Agent	Harriet Barber	Montagu Evans	T.A.S.B. Investments Limited
25	Agent	Neil Rowley	Savills	Osbourne Investments Limited and Quattro Holdings Limited
26	Strategic Partner	Archie Onslow	North London Waste Plan	
27	Planning Consultant	Claire Treanor	Treanor Consulting	Castlepride Limited
28	Strategic Partner	Lucinda Turner	Transport for London	
29	Planning Consultant	Dan Di-Lieto	Lichfields	Citrus Group and Fuller Smith & Turner
30	Local Authority	Steve Barton	London Borough of Ealing	

Res. Ref.	Respondent Type	Name	Organisation	On behalf of
31	Community Group	Megan Lewis	Crisis Brent	
32	Local Resident	Bernie Timmins		
33	National Body	Mark Furnish	Sport England	
34	Developer	Harry Halpin	Fairview Homes	
35	Planning Consultant	Patrick Grincell	HGH Planning	Queens Park Rangers Football Club and Stadium Capital Developments
36	Statutory Consultee	Juliemma McLoughlin	Mayor of London	
37	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	
38	Local Resident	Tim Potter		
39	Planning Consultant	Patrick Grincell	HGH Planning	Genesis
40	Local Resident	Lori Wiechec		
41	Agent	Jack Savin-Taylor	DS2	Old Oak Park Limited
42	Planning Consultant	Jonathan Smith	DP9	Old Oak Park Limited
43	Planning Consultant	Hannah Willcock	DP9	A40 Data Centre B.V
44	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit (HUDU)	
45	Planning Consultant	James Armitage-Hobbs	DP9	Fruition Properties
46	Planning Consultant	Mark Powney	Boyer Planning	Raban Goodhall Ltd
47	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	
48	Local Authority		London Boroughs for Hammersmith and Fulham, Brent and Ealing (Joint Response)	
49	Community Group (Business)	Andrew Dakers	Park Royal Business Group	
50	Statutory Consultee	Ben Llewellyn	Environment Agency	
51	Local Resident	Stuart McCaffer		
52	Local Resident	Praveen Anand		
53	Local Authority	Nazia Idries	Health and Wellbeing Board - London Borough of Ealing	
54	Local Resident	Victoria Hollertz		
55	Agent	Jonathan Stoddart	CBRE	Segro
56	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	
57	Local Resident	Scott Cawley		
58	Local Resident	Arnaud Demas		

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59	Local Resident	Darren Milne		
60	Local Resident	jo jo baggins		
61	Local Resident	Ron Thorp		
62	Local Resident	Douglas Hunt		
63	Education Provider	Michael Ribton	Ark Burlington danes Academy	
64	Local Resident	Kevin Early		
65	Unknown	Torquil Law		
66	Unknown	Raymond Gill		
67	Strategic Partner	Nigel Myhill	London North West Healthcare NHS Trust	
68	Community Group	Martin Cain	Friary Park Preservation Group	
69	Unknown	Chris Billington		
70	Local Resident	Joanna Betts		
71	Local Business	Ben Eastop	ACAVA	
72	Education Provider	Catherine Collum	West Twyford Primary School	
73	Unknown	A Somefun		
74	Unknown	Chloe Fremantle		
75	Community Group	Henry Lancashire	Brent Cyclists	
76	Strategic Partner	Colin Lovell	Diocese of London	
77	Local Resident	Sarah Abrahart		
78	Interest Group	Robin Brown	Just Space	
79	Local Resident	David Craine		
80	Local Resident	Noam Leshem		
81	Community Group	Chloe Fremantle	ArtWest	
82	Neighbourhood Forum	Henry Peterson	St Quintin and Woodlands Neighbourhood Forum	
83	Local Resident	Nadia Samara		
84	Local Resident	Nicholas Kasic		
85	Local Resident	Francis, Marc and Caroline Sauzier		
86	Community Group	Nicholas Fernley	Hammersmith and Fulham Historic Buildings Group	
87	Local Resident	Patrick Munroe		
88	Local Resident	Lily Gray		
89	Local Resident	Nicky Guymer		
90	Local Resident	John Cox		
91	Local Resident	Bruce Stevenson		
92	Community Group	Tom Ryland	Hammersmith Society	

Res. Ref.	Respondent Type	Name	Organisation	On behalf of
93	Residents Association		Wells House Road Residents Association	
94	Oonagh Heron	Oonagh Heron		
95	Mark Walker	Mark Walker		
96	Local Resident	John Cox		
97	Local Resident	Ralph Scully		
98	Strategic Partner	Adam Price	Transport for London (Commercial Development)	
99	Residents Association	John Haston	West Twyford Residents Association	
100	Neighbourhood Forum	Mark Walker	Old Oak Interim Neighbourhood Forum	
101	Local Resident	Jason Salkely		
102	Community Group	Jacky Peacock	Harlesden Lets	
103	Local Resident	Dave Turner		
104	Community Group	Del Brenner	Regents Network	
105	Agent	Caroline McDade	Deloitte	Mapletree Pte
106	Local Resident	Catherine Sookha		
107	Community Group	Mark Walker	TITRA	
108	Statutory Consultee	Samantha Powell	Education and Skills Funding Agency	
109	Local Resident	Lynette Hollender		
110	Community Group	Sharon Hayward	Grand Union Alliance	
111	Local Resident	Jeremy Aspinall		
112	Local Resident	Bini Ghebreyesus		
113	Local Resident	Thomas Dyton		
114	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	
115	Local Resident	Nye Jones		
116	Community Group	Mark Balaam	West London Line Group	
117	Community Group	Jeffrey St. Paul	Pentecostal City Mission	
118	Planning Consultant	Rory McManus	Turley	Ashia Centur Limited
119	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	
120	Neighbourhood Forum	Leão Neto	Harlesden Neighbourhood Forum	

General Comments

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
3	5	Local Resident	A. Anderson		General			Great news that you are redeveloped the area only thing is that you have completely forgotten about Brentfield Road that's a main road that leads you to Central London or back to Wembley Stadium you have put new properties on Bridge Road also under construction is knatchbull Road I live in block call Shackleton house on Brentfield Road the Council have said No plans of redeveloping my Block it is a shame.
10	22	Planning Consultant	Matt Hill	Maddox Planning Consultants (on behalf of Culinary Quarter (London) Ltd)	General			We write on behalf of our client, Culinary Quarter (London) Ltd, in response to the Regulation 19 consultation on the Old Oak and Park Royal Development Corporation (OPDC) revised draft Local Plan and the published Development Capacity Study. Our client is a prospective applicant for 2 Portal Way and is currently working with a number of key stakeholders, including the OPDC to bring it forward for development. Our client supports the overall pro-growth strategy set out within the Plan and also supports the Council's efforts being undertaken to ensure an up-to-date Local Plan is in place. Our response on the legal compliance, soundness and duty to co-operate are provided below with specific comments on the contents of the Plan followed thereafter. Legal compliance We are of the view that the Plan meets the tests for legal compliance as set out under section 20(5)(a) of the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012. Soundness For a plan to be considered sound, paragraph 182 of the National Planning Policy Framework sets out that it must be: - "Positively prepared – the plan must be prepared and based on a strategy which seeks to meet objectively assessed requirements and where it is consistent with achieving sustainable development; - Justified – the plan should be the most appropriate strategy, when considered against reasonable alternatives, based on appropriate evidence; - Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and - Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework." Taking the above into consideration, we consider the Plan as a whole meets the test of soundness as set out within paragraph 182 of the National Planning Policy Framework. Duty to co-operate The OPDC has a duty to co-operate on strategic planning issues that cross authority boundaries as set out within the Planning and Compulsory Purchase Act 2004 (as amended) and the NPPF. The OPDC's Duty to Co-operate Statement, which accompanies the revised Local Plan, indicates that the Corporation has been in discussion with a number of authorities and bodies as part of the preparation of the Plan. To ensure compliance with the duty to co-operate, we recommend that the OPDC continue to co-ordinate with the relevant authorities and bodies in the delivery of this Local Plan and support the continuation of this through the life of the plan. Notably with local planning authorities such as Ealing on the likely development capabilities of the allocated site.
11	39	Statutory Consultee	Sue Hardy	NHS Brent CCG	General			We are keen that the wider policies on living environments reflect that there is a high level of deprivation and obesity in the OPDC Area. The individual borough Health and Wellbeing strategies need to be supported by the Local Plan particularly in respect to reducing health inequalities and childhood obesity. This is further reinforced by the National Planning Practice Guidance (NPPG) on health and wellbeing which supports local planning authorities to develop local plan policies to create healthier food environments by limiting the proliferation of certain use classes in proximity to schools.
13	50	Developer	Paul Gilfedder	HS2 Ltd.	General			Thank you for consulting High Speed Two (HS2) Ltd. on 2nd Draft (Regulation 19) Local Plan. HS2 Ltd. has been engaged with Old Oak and Park Royal Development Corporation (OPDC) throughout the preparation of the 2nd Draft and is pleased to see that significant progress has been made in the drafting of some policies in the plan to reflect the powers established in the High Speed Rail(London West Midlands) Act 2017 ("the Act"), the Act scheme and subsequently HS2Ltd.'s scope. We hope to continue this productive process of engagement to resolve the outstanding concerns in time for examination in public. However, HS2 consider the draft plan to be unsound on the grounds that certain policies within the plan are not justified or effective and as such do not meet the tests set out in paragraph 182 of the NPPF.
13	57	Developer	Paul Gilfedder	HS2 Ltd.	General			At Royal Assent in February 2017 the Act deemed planning permission for HS2 was granted by Parliament. The Act has established a planning regime in Schedule 17, under which HS2 Ltd. will need to apply for approval of detailed design for a range of elements of the Proposed Scheme from the relevant planning authority, OPDC. However, the application of local planning policies or objectives are only applicable to the determination of HS2 Act works in so far as they are relevant to the matters being sought for approval and the relevant grounds. The intention of Schedule 17 is not for local authorities to seek to modify the scope or extent of HS2 works. HS2's scope is established by the Act. Planning policy cannot be used to impose requirements for the HS2 station beyond the grounds set out in Schedule 17. It is not the purpose of Schedule 17 to replicate or modify matters which have been settled through the Bill process, including the controls set out in the Environmental Minimum Requirements (EMRs) which require HS2 Ltd. to adhere to the arrangements contained within them (e.g. Code of Construction Practice CoCP)), the Planning, Heritage, and Environmental Memoranda) in designing and constructing the HS2 works .Therefore, policies in the plan relating to the control of construction traffic and environmental and sustainability standards- such as policies P7, P8, T8, EU4, EUs, SP2 and SP3 are not applicable to HS2 works .
13	58	Developer	Paul Gilfedder	HS2 Ltd.	General			HS2 Ltd. broadly support the overall aim of the plan and recognises its regeneration and development aspirations. However, for the plan to be sound, HS2 Ltd. consider that it has to be more flexible and plan for a range of development scenarios, as well as recognising HS2's scope for station design capacity and related works delivery under the provisions of the Act.

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17	102	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	General			Whilst the Trust has detailed comments to make on policies related to, or potentially affecting, the Grand Union Canal (see below), we strongly welcome the intention that it will be central to the future development of the area. We are pleased that as well as making reference to sensitivities and opportunities related to the canal throughout the plan, it contains a single policy (P3), which seeks to bring these issues together. By doing so, and by setting out a vision statement for the canal, the plan gives a clear sense of the place that the OPDC hope it will become and the way that it will relate to the new development around it. We share the OPDC's vision of a waterway that is a destination, providing a heritage asset and contributing to the area's sense of place. We welcome the fact that the OPDC see activity on the water and alongside it as a key part of the placemaking strategy for the waterway and its environs. We consider this to be a sound strategy.
22	179	Interest Group	Ed Randall	Professional Land Research Group and Coalition for Economic Justice	General			The Draft Local Plan does not reflect the recommendation of the Mayor's Review of OPDC , in particular with regards the value for money for Londoners with respect of the Land transfer deal. OPDC should reflect new thinking on more sustainable economics for land and housing to deliver and guard against hugely destructive cycle of land financialization.
25	201	Agent	Neil Rowley	Savills (on behalf of Osbourne Investments Limited and Quattro Holdings Limited)	General			Boden House is located on the east side of Victoria Road, north of the London Underground Central Line and west of the London Overground rail line. The site consists of Boden House which is a five storey 1970s office building, a warehouse building to the north of Boden House and a concrete batching yard to the east. The revised draft Local Plan identifies the site as falling within an area allocated for a mix of uses and suitable for high density development with tall building heights. The site is located on the primary route identified between North Acton and Old Oak Common stations. The site is located within the North Acton and Acton Wells sub area. Generally we support the aims and vision of the OPDC and the regeneration of Park Royal.
34	427	Developer	Harry Halpin	Fairview Homes	General			We have had the opportunity to review the document in detail, and in general are supportive of the plan as meeting the development and infrastructure requirements of the OPDC, based on proportionate evidence, deliverable over the plan period, and consistent with National Planning Policy. In particular, draft Local Plan policies EU1(c), T4(c), and D6(a) have been complied with following the advice of the case officer. We request that any further changes to the Local Plan document or program are formally notified to the attached details from Fairview New Homes.
36	450	Statutory Consultee	Juliemma McLoughlin	Mayor of London	General			The Mayor welcomes the positively planned approach set out in the draft Local Plan and its support for strategic and local infrastructure. The draft Local Plan's approach of allocating a significant amount of land for new housing and employment over the period 2018-2038 is welcomed. The Plan also identifies development opportunities beyond the plan period. The quantum of development allocated for the plan period is 22,350 new homes and 67,900 jobs (the jobs figure in draft policy SP5 appears to supersede that on page 12 under Economic Growth). This housing figure is below the minimum guideline of 25,500 new homes set out for Old Oak Common and Park Royal Opportunity Areas in Annex 1 of the London Plan, however the draft Local Plan envisages capacity for a further 4550 new homes beyond 2038. The draft Plan also identifies the capacity to deliver a further 1,800 jobs beyond the plan period.
36	451	Statutory Consultee	Juliemma McLoughlin	Mayor of London	General			The Mayor understands that the OPDC is doing further work that will refine these minimum delivery figures and that there is an evolving understanding of land availability, developer interest, anticipated progress with HS2 and other rail infrastructure and phasing of delivery.
37	485	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	General			The plan provides a comprehensive and exciting vision for the future of the area. ACE agrees that the development provides a once in a lifetime regeneration opportunity to take full advantage of current and future transport connections in the area.
37	486	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	General			ACE notes the plan is consistent with the broader objectives of the Greater London Authority, such as those presented in the current London Mayor's Transport Strategy.
37	492	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	General			ACE believes the plan is positively prepared and we look forward to following its progress in the next stages.
38	502	Local Resident	Tim Potter		General			I welcome much that is contained in the plan. The area stands to benefit greatly from development and regeneration.
47	674	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	General			Whilst we have a number of detailed comments and suggestions which are set out in full on the following pages, the general thrust of our response is to help ensure that impacts from new development proposed in OPDC do not have a detrimental impact, and in fact result in a positive impact, on the environment and character of RBKC. We are in no doubt that OPDC would share this general principle.
47	675	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	General			The Council shares the OPDC's vision for the area as one which can provide much needed jobs and homes in the area that can support London's growth. The Council welcomes the creation of a real sense of place, and a "series of high quality neighbourhoods and spaces" (Foreword).
47	676	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	General			I would like to confirm that the Council wishes to participate at the oral examination.
50	779	Statutory Consultee	Ben Llewellyn	Environment Agency	General			Having reviewed the draft Local Plan and the supporting studies we consider it sound. We have been consulted at the relevant statutory stages and outside of the statutory consultation stages. We therefore consider that the plan has been prepared in accordance with the Duty to Co-operate from the perspective of OPDC's approach to agreeing on strategic environmental matters with us. We strongly support the Local Plan and the comprehensive approach OPDC have taken to producing environmental evidence base studies. It is clear that OPDC are committed to delivering high environmental standards and to addressing environmental place making challenges such as waste management, managing a finite water supply and sewerage capacity, surface water flood risk and the high demand strain on exiting green infrastructure assets. It is possible that these challenges may increase as a result of the potential impacts of climate change and it is positive that OPDC are committed to meeting these challenges as promoted by paragraph 94 of the National Planning Policy Framework

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								(NPPF) and to providing the relevant infrastructure as promoted by paragraphs 156 and 162 of the NPPF. We are pleased that our comments in response to the Regulation 18 consultation have largely been addressed. The latest climate change allowances for flood risk have been referenced in the relevant policies and the requirements of paragraphs 100-104 of the National Planning Policy Framework in relation to the Sequential Test have been satisfied within the Integrated Water Management Study. Parts of OPDC are at risk of surface water flooding and we are pleased that when it will not be possible to avoid development in areas at risk of surface water flooding, new development within these areas will be designed to a high standard and reduce surface water flood risk. We are also pleased that the Local Plan and Integrated Water Management Strategy has identified the need for strategic SuDs and water management measures and these measures have been included in the Infrastructure Delivery Plan.
50	781	Statutory Consultee	Ben Llewellyn	Environment Agency	General			We have included more detailed comments on specific policies in a table below as Appendix 1 [Table of detailed comments]. In summary we consider the Local Plan to be extremely positive and support OPDC in the aspiration for the highest environmental and design standards and look forward to continuing to work with you on this project. We would be happy to meet with you to discuss any of these comments in more detail.
56	840	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	General			Prior to the OPDC, the London Borough of Hammersmith and Fulham (LBHF) was the organisation responsible for all planning and other related matters for the majority of the developable area now in OPDC planning control. LBHF supports the regeneration of the OPDC area and the opportunities it may bring in creating affordable housing opportunities, integrated transport infrastructure and a mixed and sustainable development in West London. LBHF acknowledges the work that has been done and how the Plan has progressed. LBHF also welcomes the close working between officers and members and on-going future working to ensure the successful delivery of the aims and objectives of the OPDC and partners. LBHF remains the Local Authority for a large part of the OPDC area and is responsible for the delivery of a number of services, including waste, education, and highways. The Council has retained the body responsible for the following areas; the Lead Local Flood Authority, contaminated land, the Air Quality Management Area, the Lead Education Authority, the highways authority and all waste matters. For these reasons, the Council is seeking to ensure we are party to all funding and delivery mechanisms as we will be delivering these services into the future.
56	841	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	General			In response to the OPDC revised draft Local Plan, the Council attaches comments in relation to the plan, which has been provided as part of this response. The council is supportive of the majority of the plan, however, considers that some matters have not been adequately addressed and would highlight comments made in relation to the following matters in particular: - Affordable Housing - Social Infrastructure - Energy from Waste proposals - Waste.
57	966	Local Resident	Scott Cawley		General			I am not convinced local councils are engaging with this development as much as they should be doing. I would like you to be much clearer in your engagement activity with local residents what you are doing with each local council as I do not believe the council (certainly my council, Brent) has any approach or preparation for this big development on it's doorstep. As part of your working relationship with local authorities, or as part of doing business or supplying them with funds, one stipulation should be that you ensure that council consultation and engagement work is to as high and thorough standard as the OPDC's.
68	1074	Community Group	Martin Cain	Friary Park Preservation Group	General			Most of the concerns such as the lack of definition for affordable are general but the OPCD has failed to identify the needs of the elderly and disabled and needs to address this.
70	1077	Local Resident	Joanna Betts		General			Honestly how would I know the answers to these questions?! The language used for this survey is not accessible - I don't think you are asking the right questions. I have no idea if the policy is legally compliant. Do I consider it to be effective? This is hard to answer as in this particular document section there is only one paragraph about it which doesn't give much detail.
70	1079	Local Resident	Joanna Betts		General			2.1 It should be noted that WHRRA and its members support the detailed cases put forward by the following groups: - Grand Union Alliance - Old Oak Interim Neighbourhood Forum - TITRA - Wesley Estate RA - Midland Terrace & Shaftesbury Gardens Residents - Hammersmith Society - Friends of Wormwood Scrubs 2.2 We ask that evidence and support materials are used from the submissions by the above groups. 2.3 We are therefore submitting 'headline' issues that outline items of key importance to Wells House Road residents.
70	1087	Local Resident	Joanna Betts		General			We are disappointed by the lack of vision and creativity from the OPDC. This appears to be largely due to their prioritisation of achieving the unrealistic target of 24,000 homes, rather than creating a truly vibrant, forward-looking, futuristic new neighbourhood for Londoners.
70	1103	Local Resident	Joanna Betts		General			We wish to be part of the development of a list of community assets to be preserved in our area; and these should include preserving Acton Wells signal box and original warehouses along the Grand Union Canal. Some of these might be options for the OONF to manage or purchase.
81	1242	Community Group	Chloe Fremantle	ArtWest	General			We certainly support the far reaching and inclusive (of many areas of the arts) principles of the local plan
82	1248	Neighbourhood Forum	Henry Peterson	St Quintin and Woodlands	General			Having attended the consultation meetings on the Regulation 18 and 19 Local Plans, we do not feel that there has been meaningful consultation on any option other than to build 24,000 new homes within the OPDC area, the vast majority to be at Old Oak.

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				Neighbourhood Forum				
82	1256	Neighbourhood Forum	Henry Peterson	St Quintin and Woodlands Neighbourhood Forum	General			This is not a clear and transparent Local Plan of the kind we understand that the NPPF requires.
82	1258	Neighbourhood Forum	Henry Peterson	St Quintin and Woodlands Neighbourhood Forum	General			Planning permissions already granted by OPDC in Scrubs Lane, on the basis of emerging policies promoting an artificial concept of 'clusters' which have never been formally consulted on. These residential towers of around 20 storeys (if built) will cause serious harm to views from Little Wormwood Scrubs and the Kensington section of the Grand Union Canal. Our sister organisation (St Helens Residents Association) submitted a series of objections to these proposed residential towers, on similar lines to those submitted by the Royal Borough and by Historic England, to no avail. We consider the Corporation's reliance on 'emerging policy' to be excessive and beyond what the NPPF intends.
83	1261	Local Resident	Nadia Samara		General			2.1 It should be noted that WHRRA and its members support the detailed cases put forward by the following groups: - Grand Union Alliance - Old Oak Interim Neighbourhood Forum - TITRA - Wesley Estate RA - Midland Terrace & Shaftesbury Gardens Residents - Hammersmith Society - Friends of Wormwood Scrubs 2.2 We ask that evidence and support materials are used from the submissions by the above groups. 2.3 We are therefore submitting 'headline' issues that outline items of key importance to Wells House Road residents.
83	1266	Local Resident	Nadia Samara		General			In order to 'soften the blow', there is a need for a 'buffer zone' of around 100 meters between the existing communities and new developments that will be higher than existing buildings. We require justification of the unreasonable plot ratios and the 'soft area', which has not been included in Reg. 19 despite our repeated requests throughout the consultation. At all costs, OPDC developments should avoid overshadowing, the intensification of pressure on transport, and should revert to the previous agreement in Reg. 18 on sensitive edges. Ideally, OPDC should provide formal limits to the proximity of new developments around sensitive existing communities and move to a policy of green space around new developments.
83	1269	Local Resident	Nadia Samara		General			We are disappointed by the lack of vision and creativity from the OPDC. This appears to be largely due to their prioritisation of achieving the unrealistic target of 24,000 homes, rather than creating a truly vibrant, forward-looking, futuristic new neighbourhood for Londoners.
83	1285	Local Resident	Nadia Samara		General			We wish to be part of the development of a list of community assets to be preserved in our area; and these should include preserving Acton Wells signal box and original warehouses along the Grand Union Canal. Some of these might be options for the OONF to manage or purchase.
84	1288	Local Resident	Nicholas Kasic		General			2.1 It should be noted that WHRRA and its members support the detailed cases put forward by the following groups: - Grand Union Alliance - Old Oak Interim Neighbourhood Forum - TITRA - Wesley Estate RA - Midland Terrace & Shaftesbury Gardens Residents - Hammersmith Society - Friends of Wormwood Scrubs 2.2 We ask that evidence and support materials are used from the submissions by the above groups. 2.3 We are therefore submitting 'headline' issues that outline items of key importance to Wells House Road residents.
84	1296	Local Resident	Nicholas Kasic		General			We are disappointed by the lack of vision and creativity from the OPDC. This appears to be largely due to their prioritisation of achieving the unrealistic target of 24,000 homes, rather than creating a truly vibrant, forward-looking, futuristic new neighbourhood for Londoners.
84	1312	Local Resident	Nicholas Kasic		General			We wish to be part of the development of a list of community assets to be preserved in our area; and these should include preserving Acton Wells signal box and original warehouses along the Grand Union Canal. Some of these might be options for the OONF to manage or purchase.
85	1315	Local Resident	Francis, Marc and Caroline Sauzier		General			2.1 It should be noted that WHRRA and its members support the detailed cases put forward by the following groups: - Grand Union Alliance - Old Oak Interim Neighbourhood Forum - TITRA - Wesley Estate RA - Midland Terrace & Shaftesbury Gardens Residents - Hammersmith Society - Friends of Wormwood Scrubs 2.2 We ask that evidence and support materials are used from the submissions by the above groups. 2.3 We are therefore submitting 'headline' issues that outline items of key importance to Wells House Road residents.
85	1320	Local Resident	Francis, Marc and Caroline Sauzier		General			In order to 'soften the blow', there is a need for a 'buffer zone' of around 100 meters between the existing communities and new developments that will be higher than existing buildings. We require justification of the unreasonable plot ratios and the 'soft area', which has not been included in Reg. 19 despite our repeated requests throughout the consultation. At all costs, OPDC developments should avoid overshadowing, the intensification of pressure on transport, and should revert to the previous agreement in Reg. 18 on sensitive edges. Ideally, OPDC should

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								provide formal limits to the proximity of new developments around sensitive existing communities and move to a policy of green space around new developments.
85	1323	Local Resident	Francis, Marc and Caroline Sauzier		General			We are disappointed by the lack of vision and creativity from the OPDC. This appears to be largely due to their prioritisation of achieving the unrealistic target of 24,000 homes, rather than creating a truly vibrant, forward-looking, futuristic new neighbourhood for Londoners.
85	1339	Local Resident	Francis, Marc and Caroline Sauzier		General			We wish to be part of the development of a list of community assets to be preserved in our area; and these should include preserving Acton Wells signal box and original warehouses along the Grand Union Canal. Some of these might be options for the OONF to manage or purchase.
87	1362	Local Resident	Patrick Munroe		General			2.1 It should be noted that WHRRA and its members support the detailed cases put forward by the following groups:- Grand Union Alliance- Old Oak Interim Neighbourhood Forum- TITRA- Wesley Estate RA- Midland Terrace & Shaftesbury Gardens Residents- Hammersmith Society- Friends of Wormwood Scrubs2.2 We ask that evidence and support materials are used from the submissions by the above groups.2.3 We are therefore submitting 'headline' issues that outline items of key importance to Wells House Road residents.
87	1370	Local Resident	Patrick Munroe		General			We are disappointed by the lack of vision and creativity from the OPDC. This appears to be largely due to their prioritisation of achieving the unrealistic target of 24,000 homes, rather than creating a truly vibrant, forward-looking, futuristic new neighbourhood for Londoners.
87	1386	Local Resident	Patrick Munroe		General			We wish to be part of the development of a list of community assets to be preserved in our area; and these should include preserving Acton Wells signal box and original warehouses along the Grand Union Canal. Some of these might be options for the OONF to manage or purchase.
88	1389	Local Resident	Lily Gray		General			2.1 It should be noted that WHRRA and its members support the detailed cases put forward by the following groups: - Grand Union Alliance - Old Oak Interim Neighbourhood Forum - TITRA - Wesley Estate RA - Midland Terrace & Shaftesbury Gardens Residents - Hammersmith Society - Friends of Wormwood Scrubs 2.2 We ask that evidence and support materials are used from the submissions by the above groups. 2.3 We are therefore submitting 'headline' issues that outline items of key importance to Wells House Road residents.
88	1394	Local Resident	Lily Gray		General			In order to 'soften the blow', there is a need for a 'buffer zone' of around 100 meters between the existing communities and new developments that will be higher than existing buildings. We require justification of the unreasonable plot ratios and the 'soft area', which has not been included in Reg. 19 despite our repeated requests throughout the consultation. At all costs, OPDC developments should avoid overshadowing, the intensification of pressure on transport, and should revert to the previous agreement in Reg. 18 on sensitive edges. Ideally, OPDC should provide formal limits to the proximity of new developments around sensitive existing communities and move to a policy of green space around new developments.
88	1397	Local Resident	Lily Gray		General			We are disappointed by the lack of vision and creativity from the OPDC. This appears to be largely due to their prioritisation of achieving the unrealistic target of 24,000 homes, rather than creating a truly vibrant, forward-looking, futuristic new neighbourhood for Londoners.
88	1413	Local Resident	Lily Gray		General			We wish to be part of the development of a list of community assets to be preserved in our area; and these should include preserving Acton Wells signal box and original warehouses along the Grand Union Canal. Some of these might be options for the OONF to manage or purchase.
92	1478	Community Group	Tom Ryland	Hammersmith Society	General			We believe that its planning policies should be in line with those of the NPPF and the London Plan. However, in each of submissions noted above, we have expressed our concerns that some policies and target figures considerably exceed established guidelines (Eg. Overall housing target figures) We are disappointed that despite a Mayoral Review of the project in June 2017, these targets have not been properly reassessed. We do not consider there is an adequate evidence base to support these target figures. Accordingly we consider that the Plan as drafted is unsound.
92	1481	Community Group	Tom Ryland	Hammersmith Society	General			The Hammersmith Society still believe the following are key objectives for the development of the OPDC area: The need to balance the global city development values with appropriate local neighbourhood aspirations
92	1484	Community Group	Tom Ryland	Hammersmith Society	General			The Hammersmith Society still believe the following are key objectives for the development of the OPDC area : The importance of learning from the mistakes of previous Mayoral Development Corporations and other Opportunity Areas.
92	1493	Community Group	Tom Ryland	Hammersmith Society	General			The calculations for the S.106 and CIL receipts are based upon the overall housing and employment targets which we have argued elsewhere are incompatible with the other development targets for the project as a whole. These massive housing and employment targets are made on the basis of assessment of growth for London (and the UK as a whole) but there is no certainty that these growth expectations will be realised nor that there will be the demand in this particular location, nor contingency if the assumptions prove incorrect. The failure of the Plan to provide contingency assumptions calls into question whether the Plan is effective and deliverable.
92	1494	Community Group	Tom Ryland	Hammersmith Society	General			It should be noted as a key factor in compiling and taking account of responses to the consultation that the actual OPDC area has relatively few residents, therefore numerically the number of resident responses will be consequently low. The number of responses should not be taken to assume a lack of concern by residents, whether local or in the surrounding areas. Groups representing the communities around the OPDC area, which will be very much affected by the development, have worked very hard during the consultation and their responses must be given due weight. This has not been helped by the recent lack of Community Engagement by OPDC on the project.
92	1496	Community Group	Tom Ryland	Hammersmith Society	General			In view of the uncertainties arising from Brexit, there should be a fall back position for slower Economic growth (Ref. Figure 2.1 Opportunities and Challenges p12 and SP5 Economic Resilience) without which the Plan cannot be regarded as being positively prepared, justified and effective.

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92	1501	Community Group	Tom Ryland	Hammersmith Society	General			These would seem to be fundamental questions, which go to the heart of the project. We note the recent appointment of AECOM as Masterplanners for the project as a whole. We are heartened that HS2 has launched its international competition for the design of the station as this should assist in the clarifying of the brief, but until such time as these matters are resolved, the Plan as a whole and that for Places P1 – Old Oak South must be regarded as unsound.
92	1505	Community Group	Tom Ryland	Hammersmith Society	General			We have already seen that the planning approvals granted to date by OPDC involve excessive densities in these peripheral sites (Eg. Oaklands, North Kensington Gate and Mitre Yard) despite objections from London Borough of Hammersmith and Fulham, and local groups including the Hammersmith Society. The current application for 2 Scrubs Lane, already objected to by the Borough on the basis of 'Design, Heritage, Amenity, Transport, Housing and Environmental Matters' is likely to be approved by the OPDC committee regardless of these objections and concerns. This repeated over-riding of local views only serves to discredit the worthy ambitions of the OPDC project.
92	1510	Community Group	Tom Ryland	Hammersmith Society	General			We would note that no Options regarding the housing targets or how they could be achieved, and resultant densities, were offered at any stage and most specifically at the Regulation 18 consultation stage, and on this basis the Plan must be regarded as not properly evidence based or planned and as such is unsound. We very much hope that the appointed Masterplanners will be able to provide an accurate visualisation of the consequences.
92	1578	Community Group	Tom Ryland	Hammersmith Society	General			We are disappointed that the Plan fails to provide a strong overall development management policy.
92	1594	Community Group	Tom Ryland	Hammersmith Society	General			We would also like to commend the Photographic Survey undertaken by Henry Peterson, Amanda Souter and John Goodier in connection with the recording and possible preservation of buildings/historic assets within the Car Giant owned site.
92	1637	Community Group	Tom Ryland	Hammersmith Society	General			We are pleased to note that scales are now shown on all plans as we requested in our previous submission. This is a particularly important on 'Walking Infrastructure' map. (Figure 7.5: P.196).
92	1718	Community Group	Tom Ryland	Hammersmith Society	General			Paras. 11.34 – 11.37 stress the importance given to Community Engagement by OPDC. However, the reality has been for long periods since the commencement of the project, when for one reason or another there has been no Community Engagement Officer available. This and the planning decisions noted above, which have also ignored the views of community groups such as ours, have led to disillusionment over the process within the local community and groups. To an extent the lack of a Community Engagement Officer has been mitigated by the Grand Union Alliance of which we are members, as we have found an excellent community forum for local groups such as ours. We very much hope that the funding for the groups and officers can be continued.
93	1737	Residents Association		Wells House Road Residents Association	General			2.1 It should be noted that WHRRA and its members support the detailed cases put forward by the following groups: - Grand Union Alliance - Old Oak Interim Neighbourhood Forum - TITRA - Wesley Estate RA - Midland Terrace & Shaftesbury Gardens Residents - Hammersmith Society - Friends of Wormwood Scrubs 2.2 We ask that evidence and support materials are used from the submissions by the above groups. 2.3 We are therefore submitting 'headline' issues that outline items of key importance to Wells House Road residents.
93	1745	Residents Association		Wells House Road Residents Association	General			We are disappointed by the lack of vision and creativity from the OPDC. This appears to be largely due to their prioritisation of achieving the unrealistic target of 24,000 homes, rather than creating a truly vibrant, forward-looking, futuristic new neighbourhood for Londoners.
93	1761	Residents Association		Wells House Road Residents Association	General			We wish to be part of the development of a list of community assets to be preserved in our area; and these should include preserving Acton Wells signal box and original warehouses along the Grand Union Canal. Some of these might be options for the OONF to manage or purchase.
94	1782	Local Resident	Oonagh Heron		General			Neighbourhood forum: Finally, I would like to express my disappointed in the OPDC's decision to savagely restrict the designation we asked for. We would have been able to reach small communities struggling to know what it planned and how it affects them and how to contribute to discussion and have their voices heard. Please don't disregard the impact of your plans on the people who are already living here and have built up thriving local communities. Please work with us and don't squash us out of existence or refuse to accommodate our views.
97	1818	Local Resident	Ralph Scully		General			2.1 It should be noted that WHRRA and its members support the detailed cases put forward by the following groups: - Grand Union Alliance - Old Oak Interim Neighbourhood Forum - TITRA - Wesley Estate RA - Midland Terrace & Shaftesbury Gardens Residents - Hammersmith Society - Friends of Wormwood Scrubs 2.2 We ask that evidence and support materials are used from the submissions by the above groups. 2.3 We are therefore submitting 'headline' issues that outline items of key importance to Wells House Road residents.
97	1826	Local Resident	Ralph Scully		General			We are disappointed by the lack of vision and creativity from the OPDC. This appears to be largely due to their prioritisation of achieving the unrealistic target of 24,000 homes, rather than creating a truly vibrant, forward-looking, futuristic new neighbourhood for Londoners.
97	1842	Local Resident	Ralph Scully		General			We wish to be part of the development of a list of community assets to be preserved in our area; and these should include preserving Acton Wells signal box and original warehouses along the Grand Union Canal. Some of these might be options for the OONF to manage or purchase.

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98	1845	Strategic Partner	Adam Price	Transport for London (Commercial Development)	General			TfL CD broadly supports the contents of the draft document
100	1878	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	General			The Interim Forum responded to the Regulation 18 Local Plan. While welcoming the principle of well-planned regeneration for Old Oak, we expressed our concerns about the direction of travel of certain key policies in the local plan. We said in our March 2016 response: Local people and businesses want to see forms of development and change that bring real improvement to quality of life, but which also learn from past experience of major regeneration opportunities in London and other major cities. We share the OPDC's ambition that Old Oak should become a successful part of the capital, and an exemplar in terms of urban regeneration. There is however a concern amongst existing residents and businesses over a potential gap between rhetoric and reality in the first version of the OPDC Local Plan. The foreword promises not only a place to live and work, but one to visit and enjoy, time and again. The policies speak of world class and exemplary architecture and design. Yet when the wording of the Plan's preferred policies is unpicked, and the numbers are crunched on target densities and optimising growth, local anxiety has grown. The fear is that by the end of the Local Plan period in 2036, regeneration of the OPDC area will not be viewed as global city planning at its best and most forward-looking. We hope for more than a repeat version of recent development at Nine Elms/Battersea/Vauxhall, with some elements of Kings Cross and the Olympic Park thrown in. 3.2 Regrettably, these concerns of local residents have grown, rather than lessened, over the past 18 months. Evidence of the reality of the impact of OPDC planning decisions for Scrubs Lane and for North Acton (where the Corporation has passed accountability back to LB Ealing, for reason which residents do not understand) is persuading a growing body of local people that the OPDC area is heading towards a major failure urban renewal. 3.3 We see little in the evolution of the Regulation 19 Local Plan from the Regulation 18 version that reduces these concerns.
100	1879	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	General			4.1 The Hammersmith and Fulham Draft Local Plan (published January 2015) consulted on a Strategic Policy OORA for the Old Oak regeneration area which was premised on creating a new urban quarter over the period 2015-35 of 6,000 indicative homes and 20,000 indicative jobs. The 'full potential' of the area, over a longer period was envisaged by Hammersmith & Fulham Council as 18,000 homes. 4.2 In more detail the LBHF draft policy was framed as: Optimise development potential. Development around the edges of the OORA should in terms of scale and form be sensitively integrated into the surrounding context. Tall buildings of exceptionally good design may be acceptable, as part of increased massing nearer to areas of high public transport accessibility and subject to detailed analysis of their impact on nearby heritage assets 4.3 The LBHF 2015 Draft Local Plan offered options for the Old Oak Regeneration Area Alternative Options - Policy OORA (Strategic Policy – Old Oak Regeneration Area) - Maintain the current policy where existing strategic industrial land and waste uses are safeguarded. - Defer the regeneration of parts of the site until suitable transport nodes are operational - Optimise the quantum of development as far as possible but prohibit tall buildings in the regeneration area. - Rather than a mix of employment and residential, land use could be weighted towards the provision of employment. - Rather than a mix of employment and residential, land use could be weighted towards the provision of more residential use. 4.4 The OPDC came into being as a Mayoral Development Corporation in April 2015, and further work by LBHF on its Local Plan thereafter ceased to include the OPDC area. Hence the input to the OPDC Local Plan of the London Borough which will inherit responsibility for the long-term sustainability of Old Oak has been limited to that required under the Duty of Co-operation. 4.5 The OPDC's subsequent work on Local Plan preparation since April 2015 has not questioned, nor offered any consultation options on, the 24,000 target figure for homes at Old Oak as included in the Annexe 1 to the 2015 Further Alterations to the London Plan (FALP). Neither the OPDC OAPF nor the OPDC Regulation 18 Draft Plan explored alternatives or offered options of any significance in terms of housing targets for Old Oak. The Regulation 19 Draft Plan has taken very limited note of consultation responses questioning housing targets, densities, and building heights.
100	1880	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	General			As noted by the Inspector in his 2014 report on the FALP1, predictions of London's rapidly increasing population growth have no certainty. As he said in 2014 This revision has been driven partly by the realisation that the population of London has grown much faster than was anticipated in the 2011 London Plan. However, the extent to which this unexpected level of growth is structural or cyclical is unknown as is the ability of the Plan's existing strategies and philosophy to successfully accommodate the envisaged level of growth. In light of this, a full review of the Plan will commence in 2015. The Regulation 19 OPDC Local Plan was drafted, and is being consulted on, prior to publication of a draft of an updated London Plan. Hence there is as yet no clarity as to whether the new London Plan will retain current forecasts of housing need across London (and consequential housing targets for Opportunity Areas) or will revise these downwards.
100	1887	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	General			This lack of exploration and testing of options on housing numbers and density, through the ODPC plan-making process in our view renders the Regulation 19 version unsound in terms of the EU Strategic Environmental Assessment Directive. The proposed strategic policies SP2 and SP4, and Draft Policy H1 on Housing Supply, have not been considered against reasonable alternatives and hence are not justified. This impacts on many of the other policies in the Regulation 19 Plan which flow from the overall targets and approach.
100	1888	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	General			OPDC has commissioned a masterplan for the Old Oak part of the OPDC area, with AECOM as the lead contractor. This will assist in testing the realism and acceptability of the 'super-densities' and 'hyper-densities' that are implicit in the 24,000 new homes targets and hence in the Regulation 19 Draft Local Plan. As yet this work remains at an early stage and nothing has been published. We believe that as this masterplan progresses, its authors (as with the masterplanners for Cargiant/London and Regional Properties) will come to recognise that too much housing is being proposed for Old Oak and that the end results will prove to be serious overdevelopment and an

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								urban environment that proves unsuccessful example of UK regeneration. This does not have to happen, but is already happening in relation to OPDC planning approvals for a series of residential towers in Wood Lane, on the eastern border of the OPDC area (see paragraph 19 below for details).
100	1889	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	General			To local residents, a more sensible approach would be for a Local Plan to be built up from a detailed masterplan that tests what housing numbers the area can appropriately accommodate, without damaging quality of life for future residents, overloading the physical and social infrastructure of the area, or harming surrounding heritage assets. For the largest remaining area of undeveloped land in London, this work should be undertaken before rather than after finalisation and adoption of a Local Plan for the OPDC area. Should such work show that a 24,000 housing target be unrealistic, this should be varied.
100	1890	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	General			It is has not gone unnoticed by residents of the area that landowners/developers Cargiant/London & Regional Properties, in refining over a period of years its masterplan for its 46- acre site at Old Oak North (badged as 'Old Oak Park') originally published proposals in June 2015 for '9,000 high quality homes'. This figure has been reduced over time to 6,500 new homes in the masterplan consulted on in a fourth consultation in July 2016. To date, it appears that this reduction in planned housing numbers by one major landowner has simply had the effect of squeezing a balloon, and has led to planning permissions being granted by OPDC for developments on other sites at density levels well above those envisaged in the Regulation 18 Draft Local Plan, and well in advance of an Examination in Public of the Regulation 19 version. It appears that planning determinations reflecting this search for intensified development, have been drawn on to shape the Regulation 19 policies, including the DCS which has used existing planning permissions to inform density calculations (DCS, 2017, p. 12).
100	1891	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	General			Planning permissions for a series of residential towers have been granted by OPDC during 2016/7 based on 'emerging' policy and in the face of substantive objections from the Boroughs, Historic England, and local residents. This diminishes public confidence in the current planning system, and encourages the view that this system rarely leads to 'plan led' development ² . The same applies to even taller buildings approved by LB Ealing at North Acton and the Oaklands development approved by OPDC in Old Oak Common Lane.
101	2018	Local Resident	Jason Salkely		General			Lack of Clarity on Building Heights, Densities & Site Allocations
103	2105	Local Resident	Dave Turner		General			The draft Local Plan is not clear about housing densities, with "indicative" housing densities of 300-600 units/hectare buried in its separate Development Capacity Study.
104	2121	Community Group	Del Brenner	Regents Network	General			The proposal for a major development in the Old Oak area was welcomed, especially with the distant prospect of there being a major rail interchange in the area if the HS2 Link ever happened. It is unfortunate that the opportunities and prospects were being plotted behind closed doors, and the fate of West London was sealed with the opportunists launching an overblown and excessive development in the so-called 'Mayoral Vision' of 2013.
104	2122	Community Group	Del Brenner	Regents Network	General			By the scale and density it was obvious that it was influenced by finance and investment rather than necessity of suitable homes for Londoners and the opportunity for growth of industry and jobs. It was that basic need that should have been responded to, as well as recognition that the location is West London and not inner city.
104	2126	Community Group	Del Brenner	Regents Network	General		Page 5	The Local Plan near enough sums it up with its representation of unedifying random blocks on Page 5. It may have something to do with the all too common and misplaced aspiration for London to aspire to be a World City – whatever that means. Unfortunately it seems to result in our capital becoming identical to any other bland and overblown capital city around the world. Let them be world cities while we will be content to be London. What more could we ask?
104	2130	Community Group	Del Brenner	Regents Network	General			OPDC has already demonstrated its weakness (or compromised approach to planning) by recently giving consent to monstrous developments in Scrubs Lane for instance.
104	2155	Community Group	Del Brenner	Regents Network	General			The term precedent is used in 27 captions to photographs in Chapters 4 and 5 of the Local Plan, but nowhere else in the Plan and not mentioned in the text. It is a term that does not exist in planning law and policies, and should not be used so freely in such a key planning document as the OPDC Local Plan, especially linked with photos, which give the unsuitable term some credibility.
104	2183	Community Group	Del Brenner	Regents Network	General			The repeated use of the emotive word 'precedent' is a bit loaded. It looks like it is trying to establish over-development, and taking advantage without policies and good practice getting in the way. Unfortunately the inappropriate word is regularly used by property developers to justify a larger or higher building and, more unfortunately, planners and authorities do not question the misuse. It is essential that OPDC raise the standards and see to it that 'precedent' is boycotted.
104	2185	Community Group	Del Brenner	Regents Network	General			Following discussions by locals and residents at various levels, it does not seem clear to whom the response to the consultation of the Local Plan should be directed. The responses are sent to the OPDC Planning Team, but it is not known where the decision-making that the responses should inform is in reality to be targeted, and it seemed certain that it was not the Planning Team.
104	2186	Community Group	Del Brenner	Regents Network	General			Who is pulling the strings that are leading the OPDC development to grow bigger and progressively higher, and that seem to be working against the communities, residents and neighbourhoods of this location in West London? The respondents (locals, residents and Londoners) are anxious to inform and influence their 'masters' in order for the development to be toned down to some sort of human scale that would be welcome in West London, and fit in.
104	2187	Community Group	Del Brenner	Regents Network	General			The OPDC Planning Team has been very responsive over the last couple of years, and helpful, and all seemed to be going well and the problems appeared to be getting sorted out. However . . . The governance seems to have drifted out of touch with the residents and Londoners and their administrators. Are there influences working in the background – or above their heads? Something is definitely going on, and why is that pressure being allowed to influence our lives and our future? It is said that London has become an investment item. It would be unfortunate if this also applied to the mega development in Old Oak and Park Royal. So much for our great capital city.

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106	2192	Local Resident	Catherine Sookha		General			2.1 It should be noted that WHRRA and its members support the detailed cases put forward by the following groups:- Grand Union Alliance- Old Oak Interim Neighbourhood Forum- TITRA- Wesley Estate RA- Midland Terrace & Shaftesbury Gardens Residents- Hammersmith Society- Friends of Wormwood Scrubs2.2 We ask that evidence and support materials are used from the submissions by the above groups.2.3 We are therefore submitting 'headline' issues that outline items of key importance to Wells House Road residents.
106	2200	Local Resident	Catherine Sookha		General			We are disappointed by the lack of vision and creativity from the OPDC. This appears to be largely due to their prioritisation of achieving the unrealistic target of 24,000 homes, rather than creating a truly vibrant, forward-looking, futuristic new neighbourhood for Londoners.
106	2216	Local Resident	Catherine Sookha		General			We wish to be part of the development of a list of community assets to be preserved in our area; and these should include preserving Acton Wells signal box and original warehouses along the Grand Union Canal. Some of these might be options for the OONF to manage or purchase.
109	2281	Local Resident	Lynette Hollender		General			2.1 It should be noted that WHRRA and its members support the detailed cases put forward by the following groups: - Grand Union Alliance - Old Oak Interim Neighbourhood Forum - TITRA - Wesley Estate RA - Midland Terrace & Shaftesbury Gardens Residents - Hammersmith Society - Friends of Wormwood Scrubs 2.2 We ask that evidence and support materials are used from the submissions by the above groups. 2.3 We are therefore submitting 'headline' issues that outline items of key importance to Wells House Road residents.
109	2289	Local Resident	Lynette Hollender		General			We are disappointed by the lack of vision and creativity from the OPDC. This appears to be largely due to their prioritisation of achieving the unrealistic target of 24,000 homes, rather than creating a truly vibrant, forward-looking, futuristic new neighbourhood for Londoners.
109	2305	Local Resident	Lynette Hollender		General			We wish to be part of the development of a list of community assets to be preserved in our area; and these should include preserving Acton Wells signal box and original warehouses along the Grand Union Canal. Some of these might be options for the OONF to manage or purchase.
109	2307	Local Resident	Lynette Hollender		General			Overall, we do not wish this area to become an extension of unpopular North Acton, or to be like other unpopular developments such as Canary Wharf and Nine Elms. These areas demonstrate poor quality in terms of high density, lack of community, lack of green and open spaces, play spaces, provision of social infrastructure, provision of cultural and leisure needs (acknowledged to be in need in the Retail and Leisure needs study), and contribution to existing residents' housing needs. Student housing may come along with a very low expectation of social infrastructure, or provide this internally.
110	2343	Community Group	Sharon Hayward	Grand Union Alliance	General			Furthermore, the negative aspects of early development of likely lower valuation of land due to co-existing and unpleasant uses are not mentioned in the Plan, and represents a selective presentation of available evidence. Early delivery, therefore, does not maximize the potential for achieving good policy outcomes and achieves questionable living and environmental conditions for new residents.
111	2657	Local Resident	Jeremy Aspinall		General			2.1 It should be noted that WHRRA and its members support the detailed cases put forward by the following groups: - Grand Union Alliance - Old Oak Interim Neighbourhood Forum - TITRA - Wesley Estate RA - Midland Terrace & Shaftesbury Gardens Residents - Hammersmith Society - Friends of Wormwood Scrubs 2.2 We ask that evidence and support materials are used from the submissions by the above groups. 2.3 We are therefore submitting 'headline' issues that outline items of key importance to Wells House Road residents.
111	2665	Local Resident	Jeremy Aspinall		General			We are disappointed by the lack of vision and creativity from the OPDC. This appears to be largely due to their prioritisation of achieving the unrealistic target of 24,000 homes, rather than creating a truly vibrant, forward-looking, futuristic new neighbourhood for Londoners.
111	2681	Local Resident	Jeremy Aspinall		General			We wish to be part of the development of a list of community assets to be preserved in our area; and these should include preserving Acton Wells signal box and original warehouses along the Grand Union Canal. Some of these might be options for the OONF to manage or purchase.
111	2683	Local Resident	Jeremy Aspinall		General			Overall, we do not wish this area to become an extension of unpopular North Acton, or to be like other unpopular developments such as Canary Wharf and Nine Elms. These areas demonstrate poor quality in terms of high density, lack of community, lack of green and open spaces, play spaces, provision of social infrastructure, provision of cultural and leisure needs (acknowledged to be in need in the Retail and Leisure needs study), and contribution to existing residents' housing needs. Student housing may come along with a very low expectation of social infrastructure, or provide this internally.
113	2687	Local Resident	Thomas Dyton		General			2.1 It should be noted that WHRRA and its members support the detailed cases put forward by the following groups: - Grand Union Alliance - Old Oak Interim Neighbourhood Forum - TITRA - Wesley Estate RA - Midland Terrace & Shaftesbury Gardens Residents - Hammersmith Society - Friends of Wormwood Scrubs

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								2.2 We ask that evidence and support materials are used from the submissions by the above groups. 2.3 We are therefore submitting 'headline' issues that outline items of key importance to Wells House Road residents.
113	2695	Local Resident	Thomas Dyton		General			We are disappointed by the lack of vision and creativity from the OPDC. This appears to be largely due to their prioritisation of achieving the unrealistic target of 24,000 homes, rather than creating a truly vibrant, forward-looking, futuristic new neighbourhood for Londoners.
113	2711	Local Resident	Thomas Dyton		General			We wish to be part of the development of a list of community assets to be preserved in our area; and these should include preserving Acton Wells signal box and original warehouses along the Grand Union Canal. Some of these might be options for the OONF to manage or purchase.
113	2713	Local Resident	Thomas Dyton		General			Overall, we do not wish this area to become an extension of unpopular North Acton, or to be like other unpopular developments such as Canary Wharf and Nine Elms. These areas demonstrate poor quality in terms of high density, lack of community, lack of green and open spaces, play spaces, provision of social infrastructure, provision of cultural and leisure needs (acknowledged to be in need in the Retail and Leisure needs study), and contribution to existing residents' housing needs. Student housing may come along with a very low expectation of social infrastructure, or provide this internally.
114	2726	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	General			Midland Terrace is a small residential area consisting of 32 residential units on western side of Midland Terrace. We are fully supporting the Interim Old Oak Interim Neighbourhood Forum's reply to this consultation.
114	2734	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	General			We are concerned that this Local Plan doesn't follow NPPF guidelines requiring clarity and accessibility for the reader. The current draft has no clear definition of housing densities in its main text or map showing densities, both of which the previous plan contained. Instead, this plan's Policy 3.4 and its Density Matrix uses the OPDC's own 'local context' which assumes housing densities that are higher than those used in the London Plan. The plan's discussion of "indicative" housing densities ranging from 300-600 units/hectare, are buried in the separate Development Capacity Study. We believe that information on the OPDC's intended housing densities is not presented in an accessible way for ordinary members of the public, which contravenes the NPPG.

Introduction

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28	235	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Introduction		1.20 1.21	TfL considers that the OPDC Place policies and Delivery and Implementation policies cover strategic matters, including existing and proposed transport infrastructure of both London-wide and national importance. TfL therefore welcomes that chapters 3, 4 and 11 will all form part of the OPDC's strategic policies for the area.
100	1922	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Introduction		Para 1.21	If the Place Chapters of the Plan remain in their current form, we will wish to challenge at EIP the statement at paragraph 1.21 of the document that the policies in Chapter 4 will be treated as OPDC's strategic policies when considering the general conformity of neighbourhood planning policies. NPPG Paragraph: 076 Reference ID: 41-076-20140306 sets out a series of useful considerations for determining whether a Local Plan policy is strategic, in terms of the general conformity test for neighbourhood plan policies. The fact that a LPA considers a policy to be strategic is but one of these. We do not see the Places policies in the OPDC Local Plan as meeting the first four 'considerations' (whether the policy sets out an overarching direction or objective, whether the policy seeks to shape the broad characteristics of development etc). Decisions on this issue will in any event be a decision to be made by an independent examiner of any neighbourhood plan that is submitted for examination.
116	2787	Community Group	Mark Balaam	West London Line Group	Introduction		1.23	It is not clear from the wording of this policy or from that in the Schedule 17 documentation as to how both the structural design – below ground, on the surface and above ground – and the appearance of the HS2 station box – on the surface and above ground – is to be controlled and decided upon.
116	2788	Community Group	Mark Balaam	West London Line Group	Introduction		1.23	If the overall success of the OPDC area is to be maximised, the OPDC and its Plan should seek to exploit all opportunities for public transport access, especially by rail, to and from the OPDC area. The Group has proposed in its letter dated 18 September 2017 to the Secretary of State for Transport how this could be best achieved (in terms of cost, landtake and local journey times) by building (i) a link between the HS2 platforms at Old Oak Common and the West London Line north of Westway Circus, and (ii) a raft of platforms for local rail services above the HS2 station box at Old Oak Common.
116	2789	Community Group	Mark Balaam	West London Line Group	Introduction		1.23	It would appear that the OPDC Local Plan could specify that a junction should be allowed for within the broad line of route of HS2 underground east of the HS2 platforms at Old Oak Common so that these could be directly linked to the West London Line. The junction and the link should be sought for by the OPDC so that during construction of HS2 (and OPDC works during this period) these would form a double railhead or through route for the movement of materiel, needed by the OPDC to minimise lorry movements within the OPDC Area and Region and farther afield (see Page 13 of this Plan). It is possible that a Transport & Works Act would need to be passed in order for such a link to be created.
116	2790	Community Group	Mark Balaam	West London Line Group	Introduction		1.23	The Group's second proposal is that the HS2 station box should be surmounted above ground level by a raft that during HS2 and OPDC construction should be used as a materials transfer facility and that afterwards this should be translated into a six- or eight-platform deck for local rail services connected by lifts and escalators to the Elizabeth Line and GWML surface platforms and the HS2 underground platforms. The Group has also suggested that these elements, along with retail/catering/information facilities for passengers, should be surmounted by a conference/exhibition/performance facility that not only would be the best-connected in the world, but would not require further landtake elsewhere in the OPDC area. Moreover, all this construction should in turn be surmounted by possibly a relatively high-rise mixed-use building incorporating retail, office, hotel and housing.
116	2791	Community Group	Mark Balaam	West London Line Group	Introduction		1.23	It would appear that the OPDC Local Plan could specify and control the amount and distribution of support to be provided for all this building in and around the HS2 underground platforms.
116	2792	Community Group	Mark Balaam	West London Line Group	Introduction		1.23	In any event, on behalf of existing and future local residents and future travellers through the OPDC area and across a wide swathe of south-east England who may wish to cross London here rather than via other London termini and the Underground between them, the Group trusts that the OPDC will use this Plan to ensure that HS2 and other rail partners pursue stations designs that will both (i) enhance access to and from the OPDC area and (ii) facilitate the widest possible range of journey options through Old Oak Common.

Spatial Vision

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15	69	Agent	Mark Underwood	Deloitte LLP (on behalf of Diageo)	Spatial Vision		Figure 2.2	Diageo considers that the Twyford Abbey Road should be included within the Residential Area shading on both of these diagrams.
19	130	Strategic Partner	Raymond Gill	The Inland Waterways Association- Middlesex Branch	Spatial Vision		9	In the 'Going Local' vision narrative we welcome the inclusion of the Grand Union Canal as #an 'environmental and heritage asset' to 'be conserved and enhanced'.
19	131	Strategic Partner	Raymond Gill	The Inland Waterways Association- Middlesex Branch	Spatial Vision		Figure 2.1	The Opportunities in Figure 2.1 records the Grand Union as a 'key historic feature in the area and provides a valuable green and blue link. Development will provide opportunities to consider how the canal can be enhanced as a green and blue link and as an important feature in the approach to place making'. We believe that 'Development' actually presents more of a challenge to the aims of enhancing the canal rather than providing an opportunity. We note that the opportunity to create high density development is recognised as a challenge in terms of the impact it will potentially have on townscape and the local environment. We therefore consider that the challenge of Higher Density Development shown in Figure 2.1 should specifically mention the Grand Union Canal in this respect.
19	132	Strategic Partner	Raymond Gill	The Inland Waterways Association- Middlesex Branch	Spatial Vision		Figure 2.2	The separate challenge of Deliverability refers to the Elizabeth Line Depot as a challenging site. We consider that the Crossrail depot presents more than just a challenge as its likely continued existence over many years into the future will blight the canal and will effectively thwart most of the improvements that could be made to the canal in Old Oak. We find it disappointing that the Local Plan fails to address this issue but instead continues to illustrate a spatial narrative of a commercial centre on the Elizabeth Depot site (Figure 2.2 Key Diagram) that will be unachievable for many years. The Local Plan provides no information on the options under consideration for the full or partial relocation of the Elizabeth Line Depot and D12 Table 11.1 states that 'the site will be challenging to deliver and the feasibility, timing and development capacity on this site will require on-going monitoring and consideration as part of future reviews of this Local Plan'. For a key site next to the canal this is a significant failing as it demonstrates that proportionate evidence has been ignored, appropriate strategies have not been considered and the Local Plan is not deliverable.
28	236	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Spatial Vision		Figure 2.1	Transit Oriented Development – The reference to new Hythe Road and Old Oak Common Stations is potentially misleading as these stations are not yet committed or funded. We are working with OPDC to assess the business case for them. They should be referred to as 'potential' new stations throughout the document
28	237	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Spatial Vision		Figure 2.1	Health and Wellbeing – TfL would welcome a reference to the Healthy Streets approach and for this to be embedded in the planning, design and development of the area
28	238	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Spatial Vision		Figure 2.1	Managing traffic and construction - The scale of development in Old Oak will result in increased travel demand for all modes, including the car in addition to the construction challenges highlighted. TfL suggests that this challenge should be recognised, with a reference to MTS mode share targets and traffic reduction strategies to help minimise the use of private car in particular.
28	239	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Spatial Vision		Figure 2.1	Deliverability – While we will work with OPDC should any opportunities and funding arise sooner, the presumption must be that the depot could only be brought forward for development (whilst retaining operational uses) in the longer term. With the exception of design and consents activity, this will be beyond the Plan period. References to the Elizabeth Line depot site being delivered as part of the current Local Plan should therefore be removed.
32	400	Local Resident	Bernie Timmins		Spatial Vision			Spatial Vision narrative is unsound.
32	401	Local Resident	Bernie Timmins		Spatial Vision	9		Spatial Vision narrative on environmental and heritage assets is unsound.
32	402	Local Resident	Bernie Timmins		Spatial Vision	15		Spatial Vision narrative on day-to-day quality of life is unsound.
33	404	Strategic Partner	Mark Furnish	Sport England	Spatial Vision			Sport England consider it essential that an area with such significant growth should have the health and wellbeing of its current and future community entrenched within its natural and built environment. Sport England therefore welcome that the Spatial Vision for the area specifically references that development will pioneer international excellence in health and wellbeing. In addition, Sport England share the view expressed in Figure 2.1: Opportunities and Challenges that it is incorporated to create places that support active and healthy lifestyles. This vision reflects Sport England's Strategy, Towards and Active Nation, and DCMS Strategy, A New Strategy for an Active Nation, and can be achieved by entrenching the principles of Active Design (see below) within the placemaking of Old Oak and Park Royal.
35	428	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Spatial Vision		Figure 2.1	We support the overall spatial vision. However, we encourage the OPDC to continue working proactively with all interested parties to drive forward the regeneration and to ensure that available development opportunities are acknowledged and their potential realised at the earliest opportunity.
35	429	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Spatial Vision		Figure 2.1	Transport Orientated Development – This rightly acknowledges the importance of making improvements to Willesden Junction Station; however, this should go further to note that the provision of a new bridge link between the Station and the regeneration area to the south, landing in the European Metals Recycling (EMR) site, will bring about both significant improvements in the PTAL rating of the regeneration area to the North of the Canal, and also facilitate the early delivery of a significant number of new homes and jobs in this location.

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35	430	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Spatial Vision		Figure 2.1	Grand Union Canal and Wormwood Scrubs – We support the reference to enhancing access to Wormwood Scrubs so that it can be enjoyed by more Londoners.
35	431	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Spatial Vision		Figure 2.1	Deliverability – It is right that this section acknowledges the challenges for timely delivery; however, either here, or in the Opportunities section, it should be noted that early delivery of new housing and commercial space is being achieved at Oaklands, and there are other opportunities including at Oaklands North, along Scrubs Lane and at EMR (as referred to above) where additional early development could be achieved.
37	493	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	Spatial vision			The spatial vision offers an exciting prospect for what Old Oak, Park Royal and Wormwood Scrubs will look like in twenty years' time. ACE agrees that the area has the potential to become a nationally important location by taking advantage of planned and existing transport connections in London and to the rest of the UK. We agree that developments in the area present a unique opportunity to pioneer international excellence in sustainability and design quality. This vision has the potential to become a shining beacon on what is possible with sustainable and high-quality designs across the UK. The challenges identified in the Spatial Vision will need to be monitored and mitigated by OPDC throughout the plan's period. These challenges emphasise the importance of getting the area's developments right up front, by ensuring proposals are well considered and designed to complement the vision of the plan. ACE believes OPDC should encourage private sector creativity on the development to ensure early conversion of the plan's spatial vision.
39	505	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Genesis)	Spatial vision			Genesis supports the overall spatial vision and encourage the OPDC to continue working with all interested parties to drive forward the regeneration and to ensure that available development opportunities are realised at the earliest opportunity.
39	506	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Genesis)	Spatial vision		2.1	In connection with Deliverability, it is right that this section acknowledges that this can be challenging. However, it should be noted that early delivery is being achieved at Oaklands South, and there are other opportunities including at Oaklands North where additional early development could be achieved.
42	541	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Spatial vision			We remain supportive of the spatial vision for the OPDC, including the identification on the Key Diagram of the High Street running through OOP as a Major Town Centre with mixed uses around.
42	542	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Spatial vision		2.1	Page 13: Within the Deliverability Challenges, we would welcome acknowledgement that the decision on the Elizabeth Line Depot will also affect adjacent development sites. Whilst Managing Traffic and Construction is recognized as a challenge, we query whether the Plan properly identifies solutions.
45	641	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Spatial vision			We acknowledge and support the key objectives set out in the Draft Local Plan namely to support and deliver a new part of London which is both a destination and a gateway to London and the rest of the UK.
45	642	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Spatial vision			We support the overarching objective to deliver a range of land uses including delivering 22,350 additional homes and 67,900 new jobs between 2018-38.
47	677	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Spatial Vision	Spatial Vision		The Council notes the Going Local objective “13. New development will connect local communities and neighbourhoods in the surrounding areas through high quality walking, cycling, public transport and vehicular links.” However OPDC should include explicit reference to integrate with the Kensal Canalside Opportunity Area immediately to the East of the OPDC or a reference to link to, “new and existing local communities and neighbourhoods in the surrounding areas...” to fulfil the Duty to Cooperate.
50	762	Statutory Consultee	Ben Llewellyn	Environment Agency	Spatial Vision			We welcome the ambitious nature of the vision set out in Chapter 2. We note the inclusion of references to welcome the following references (on page 10). That the vision includes that ‘development will pioneer international excellence in sustainability, health and well-being and design quality...’. We welcome the commitment to showcasing ‘high quality design’. We advise that these references to ‘High quality’ are given strong definition in policies, measurable specific targets, and relevant key performance indicators to clarify OPDC’s expectations, and to define what ‘success’ will look like
55	816	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Spatial Vision			For the reasons set out in Keep London Working, SEGRO supports the OPDC’s acknowledgement that the Park Royal Industrial Estate is a vital cog in the London economy. It also agrees with OPDC’s statement that it needs to be able to change to remain competitive (p13). SEGRO also supports the OPDC’s acknowledgement that Old Oak and Park Royal can set new standards for creating high quality, high density development through innovative design, construction and operational solutions (p12).
55	817	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Spatial Vision			A core objective of the draft Local Plan is the creation of a high density, mixed use community at Old Oak. Whilst SEGRO’s core business is the investment in and retention of logistics and industrial premises, SEGRO acknowledges the overall regeneration strategy for OPDC area, and supports the distinctive roles of Park Royal and Old Oak in achieving this in principle.
59	970	Local Resident	Darren Milne		Spatial Vision	4		Spatial Vision narrative 4 is sound. (No justification provided)
61	971	Local Resident	Ron Thorp		Spatial Vision	Overall		North Acton ghetto towers is a total disaster. Plans should be made to demolish and remove the existing towers and replace them with buildings no higher than three stories.
61	972	Local Resident	Ron Thorp		Spatial Vision	1		The existing ghetto towers are horrible little boxes hardly fit for hamsters let alone humans.
61	974	Local Resident	Ron Thorp		Spatial Vision	7		Spectacularly bland and nasty cheap design. At least the grimy Soviet cities of the 1970s had some space between the towers and even some public car parking space.
61	975	Local Resident	Ron Thorp		Spatial Vision	10		About as attractive as Chernobyl, only with worse air quality. Again, I think the Soviets probably win on this measure too.
62	989	Local Resident	Douglas Hunt		Spatial Vision	9		Current plans are to widen Victoria road and to take 50% of Cerebos Gardens in order to widen the road. As part of these plans the trees currently there will all be cut down. Once the building work is complete, can the remaining 50% of Cerebos Gardens please have trees re-

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								planted and other plants added e.g. low bushes. This will help with air pollution on a busy road, partially block out noise to the residents living in Shaftesbury Gardens and help with privacy. If the road is not widened, can bushes or other plants be added to help with air pollution.
63	996	Education Provider	Michael Ribton	Ark Burlington danes Academy	Spatial Vision	14		The profusion of cheap takeaway shops is having a detrimental effect on the health of my pupils in terms of diet and obesity.
64	998	Local Resident	Kevin Early		Spatial Vision	1		Spatial vision narrative 1 is sound. (No justification provided)
64	999	Local Resident	Kevin Early		Spatial Vision	4		Spatial vision narrative 4 is sound. (No justification provided)
64	1000	Local Resident	Kevin Early		Spatial Vision	10		Spatial vision narrative 10 is sound. (No justification provided)
65	1001	Unknown	Torquil Law		Spatial Vision			Spatial vision is legally compliant and complies with Duty to Cooperate requirement. (No justification provided)
66	1002	Unknown	Raymond Gill		Spatial Vision			Spatial vision is positively prepared and legally compliant. (No justification provided)
68	1007	Community Group	Martin Cain	Friary Park Preservation Group	Spatial Vision	Overall		The effectiveness is unsound as the statement says "places, uses and people" and the focus should be "people, places and uses".
68	1008	Community Group	Martin Cain	Friary Park Preservation Group	Spatial Vision	9		The lack of specific information about the monitoring of the protection of environmental and heritage assets makes the narrative unsound.
68	1009	Community Group	Martin Cain	Friary Park Preservation Group	Spatial Vision	11		Precise information on the funding of new homes makes this narrative unsound
68	1010	Community Group	Martin Cain	Friary Park Preservation Group	Spatial Vision	12		Using deeply flawed conventional systems of economic forecasting makes this narrative unsound
68	1011	Community Group	Martin Cain	Friary Park Preservation Group	Spatial Vision	13		Narrative 13 is not effective (no justification provided).
68	1012	Community Group	Martin Cain	Friary Park Preservation Group	Spatial Vision	14		Projections for life chances and fairness seem excessively positive and therefore unsound
69	1075	Unknown	Chris Billington		Spatial Vision	Overall		Spatial Vision is sound (no justification provided)
72	1125	Education Provider	Catherine Collum	West Twyford Primary School	Spatial Vision	6		We are a local primary with burgeoning obesity levels. We are working hard to reduce the level of obesity in school through educating children and families and are now beginning to see the impact of this. We have achieved London Healthy Schools Gold status for our work. We are among the most obese schools in one of the most obese boroughs in the country. In Year 6 a 2015-16 national survey showed 52% of our children at overweight or obese. 18% were obese. We have worked hard to try to turn this around and continue to do so. However, it would be hugely helpful to our efforts if policies were in place to prevent planning permission for new hot food takeaways close to our school. With the best will in the world it can be tempting for children but also for parents at the end of a busy day. The long-term health benefits are a real consideration here. The last thing we need is for all our positive work on health to be undone as soon as the children leave the school gates.
73	1127	Unknown	A. Somefun		Spatial Vision	Overall		Spatial Vision is sound (no justification provided)
73	1128	Unknown	A. Somefun		Spatial Vision	1		High quality design that last and ages well is so important.
74	1136	Unknown	Chloe Fremantle		Spatial Vision	5		concerns about the ecological affects to the areas rich bio diversity at present if access to the park is not suitably controlled and areas put aside for the flora and fauna etc. Dont lawyas know the answer to questions like "legally compliant?" one would hope so!
77	1174	Local Resident	Sarah Abrahart		Spatial Vision	5		Wormwood Scrubs to be excluded from the OPDC area.
77	1175	Local Resident	Sarah Abrahart		Spatial Vision	9		Policy is unsound (no justification provided)
77	1176	Local Resident	Sarah Abrahart		Spatial Vision	10		Policy is unsound (no justification provided)
79	1194	Local Resident	David Craine		Spatial Vision	Overall		I strongly support the spatial vision. Suggest replacing 'part' in para 2 with 'destination in' or similar. Add 'it will be well connected to complement its surrounding area' somewhere in para 2.
79	1195	Local Resident	David Craine		Spatial Vision	3		A big challenge around any major transport hub is that it is not just a place which people pass through (and so don't maybe treat with as much respect) but a place where they want to go in itself.
79	1196	Local Resident	David Craine		Spatial Vision	11		It is important that there are a significant number of new homes which are considered affordable by people in the surrounding area as part of the mix.
79	1197	Local Resident	David Craine		Spatial Vision	12		It is important that local people have a tangible sense of benefiting from the significant and potentially disruptive (for them) new development
79	1198	Local Resident	David Craine		Spatial Vision	13		This will help mitigate the risk that local communities will feel disconnected with or even alienated from the new development
81	1216	Community Group	Chloe Fremantle	ArtWest	Spatial vision			We very much hope the OPDC will manage to present a reasonably controlled density (not necessarily HIGH density) of mixed use development, including truly affordable housing, within really high quality design served by good transport links, whilst retaining Wormwood Scrubs Park (MOL) as a much loved and needed local green space, as well as introducing new green areas within the OPDC. We also encourage the OPDC to really include & improve life chances for existing communities, i.e ArtWest amongst others

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92	1482	Community Group	Tom Ryland	Hammersmith Society	Spatial vision			The Hammersmith Society still believe the following are key objectives for the development of the OPDC area : The importance of protecting existing facilities and land uses and delivering a balance of employment space, housing, social infrastructure, green spaces and amenities to serve local needs
92	1488	Community Group	Tom Ryland	Hammersmith Society	Spatial vision			As the Original Draft Plan stated, (para. 12.3), OPDC is in a position to push the boundaries of UK best practice in development and infrastructure and has an objective to be recognized as a leader in sustainability.
92	1495	Community Group	Tom Ryland	Hammersmith Society	Spatial vision			We support the general statements but have no specific comments. See our previously submitted 'Vision Statement and Objectives' plus our comments contained in this response.
92	1726	Community Group	Tom Ryland	Hammersmith Society	Spatial vision			Vision (of what the OPDC area will be like in the future) (Note : This vision statement refers to the eastern half of the OPDC area : The western half – previously the Park Royal Industrial Estate – has retained and enhanced its function as a thriving industrial/ employment zone). • The greatest achievement of the OPDC has been to successfully integrate the differing requirements of a major transportation hub with a local residential and business area so that both could function harmoniously, and enabling the development of an exciting and vibrant venue to visit whilst retaining its core as a attractive place to live and work. • The OPDC is more than the sum of its parts as there are elements of the development which are of wider appeal. This concept was originally identified in Key Objective 3 of the OAPF which stated : 'Potential for large scale catalyst uses such as new educational facility, football stadium, sports complex, health, arts leisure or cultural centre' : This society welcomes the arts, leisure and cultural centres which includes the lido, ice skating, concert hall and general arts facilities. • The OPDC area has exemplar, sustainable, well-connected and walkable lifetime neighbourhoods supporting both new and long established residential communities, well linked with surrounding areas. • The neighbourhoods have been well considered with moderate urban densities using a variety of dwelling types : Excessive heights of above 10 storeys have been avoided : Space standards are in excess of the Mayor of London's minimum standards : All dwellings have their own private open spaces that are commensurate with the use anticipated : Family homes have access to larger garden spaces that allow for children's play. • OPDC neighbourhoods promote cohesive communities, foster diversity, interaction and social capital. They provide the homes, local jobs, training, amenities and services, green and play spaces and accessible social and community infrastructure, which includes schools, medical facilities and a wide range of retail that meet the lifetime needs of local communities, and that comfortably accommodate those who work, spend leisure time or pass through in the area. • Locally distinctive neighbourhoods provide high quality and sustainable urban design, exceptionally high quality architecture and buildings that relate sensitively to the built and natural environmental qualities of long established residential and business areas within and surrounding the OPDC area. Valued existing buildings (Listed and otherwise), features, social facilities and amenities that are important to communities' sense of place and history have been retained and integrated into new developments and enhanced with additional facilities. The characteristics of existing Conservation Areas have been respected, protected and enhanced. • The life chances of residents, particular those of relatively deprived areas in and around the OPDC area, are increased via the delivery of strong local economic activity and employment and support for an integrated approach to skills, training and apprenticeships through to longer-term skilled employment. • Long-established Park Royal Strategic Industrial Location businesses are successfully sustained alongside new industry. New start up workspaces and existing affordable business premises are protected. Long established and valued retail shops and services including local hospitals within and on the boundaries of the OPDC area are sustained and enhanced. • Large-scale natural environmental infrastructure that is valued by local communities in and near to the OPDC area as well as by people across London specifically Wormwood Scrubs and the Grand Union Canal – have been sensitively enhanced while their integrity have been protected. Nature is thriving throughout and beyond the OPDC area. • Appropriate means of transportation and movement in, and to and from, the OPDC area are provided putting pedestrians central to a user hierarchy to support the provision of walkable, lifetime neighbourhoods. Access to new transport infrastructure sensitively interacts with local neighbourhoods and local transport needs. This has meant that both the needs and user experience of the through traveller and that of the local user have been carefully considered and their differing requirements catered for. • The architectural design and detailed planning of the transport infrastructure buildings are of exceptionally high quality (The main interchange building having been the subject of an international design competition has won many awards). The new stations have proved to be a delight to use by the huge numbers that pass through them every day. • Key multi-use catalyst buildings supporting the local community and also attractive to visitors are situated in Old Oak North and a new cultural hub (focused in part on the physical re-use and memorialisation of the industrial heritage of the area) developed beside the Grand Union Canal. • The various venues that were introduced to provide recreational and sports facilities have proved popular and are well used. (Note : The proposed relocation of Queens Park Rangers football ground was rejected at an early stage as not being in the best interest of the OPDC and its communities as a whole). • The standard of hard and soft landscaping of all the new developments has been of the highest quality and has developed and matured successfully. This has been due to the choice of simple but robust materials and well designed street furniture and imaginative and comprehensive planting schemes incorporating extensive tree planting. • Local communities have been actively involved early in visioning and planning processes, and continue to play an active role in decision-making in the OPDC area, and this has been a major contributory to the OPDC's success. • Careful consideration of the phasing of development with the OPDC area meant that individual neighbourhoods were completed with an

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								appropriate compliment of local facilities (Eg. Educational, medical, retail and recreational) and that they were protected from undue disruption in the construction of follow on phases.
92	1727	Community Group	Tom Ryland	Hammersmith Society	Spatial vision			Objectives (to achieve the vision) 1. Establish and support well connected mixed use lifetime neighbourhoods that are well-linked with surrounding neighbourhoods. - Create high quality liveable and inclusive sustainable neighbourhoods, accessible and affordable to all ages and income groups. - Housing targets to be properly evaluated as to what can provided to a medium urban density and set to ensure a mix of housing types and a range of tenures that will genuinely meet existing need (within and surrounding the OPDC area), particularly in terms of affordability (at least 50% affordable housing). - Set housing targets to meet the needs of families, older and disabled people, as well as younger couples and single people. Consideration to be given to delivering additional pitches for gypsy and traveller communities. - Deliver housing with a range of long-term secure tenures that are conducive to creating lifetime neighbourhoods, with the OPDC working with neighbouring boroughs, co-operative and community-based organisations - Deliver social housing that is indistinguishable from other tenures. - Provide homes that exceed the Mayor of London's minimum space standards and meet lifetime standards. - Monitor displacement of existing communities in and around the OPDC area as a result of increases in land values and consider safeguarding measures. - Provide appropriate mixed uses at the ground floor level of housing developments - Retain public land for publicly owned development to accrue long-term financial investment and management benefits. - Fully integrate adequate provision of social & community facilities within housing developments. - Locate dedicated new large and small scale green and open space for play, recreation, healthy exercise, meeting places, greenery, urban wildlife within and adjacent to housing developments. - Protect and enhance long-established neighbourhoods within the OPDC area to deliver elements required for lifetime neighbourhoods. - Protect and enhance existing green and play spaces. - Provide social and community spaces and other amenities and services that are currently lacking in established residential areas. - Create adequate new green spaces to meet the required standards for the new developments that exclude the Scrubs from any such calculations. - Include separate routes and spaces for walking, cycling, private and public vehicles in all streets and public realms. - Balance permeability and legibility with creation of neighbourhoods which have a sense of community ownership and security where children and older people can feel safe; provide adequate community-oriented facilities and meeting places to support engaged and empowered communities. - Balance the provision of essential local services and retail with those dedicated to the potentially lucrative activities, to service high footfalls. - Protect and safeguard existing green spaces alongside the canal to contribute to public and amenity spaces and the natural environment. - Work with neighbouring boroughs to create additional green corridors, spaces and biodiversity provision throughout and around the OPDC area to mitigate the impact of development and enhance nature. 2. Establish locally distinctive neighbourhoods that (i) provide high quality sustainable urban design, architecture and buildings, (ii) relate sensitively to long-established residential and business areas in and surrounding the OPDC area and (iii) retain and integrate buildings and features that are important to communities' sense of place and history. - Record, retain and integrate valued buildings and features of local merit and historic interest as well as those of designated heritage assets (such as the Rolls Royce Factory and other industrial buildings in Park Royal) and/or on a local list to contribute to the provision of a distinctive sense of place. - Drawn on local history to define street names and heritage activities. - Understand the distinctiveness and integrity of existing Conservation Areas so that they may be preserved and enhanced. - Provide exceptionally high standard of architecture and environmentally friendly design and set challenging targets for lifetime embodied carbon emissions. - Consideration be given to the appointment of a design champion to set and oversee design standards throughout the OPDC area. - Create adaptable and imaginative buildings that are designed to last for 150 years and use best materials and techniques in terms of sustainability. - Create exemplar low carbon developments with minimal environmental impacts. - Promote retrofitting of existing homes, businesses and other premises. - Fully integrate environmental infrastructure (including facilities for minimisation of waste and the maximisation of recycling) within housing developments. - Relocate waste sites to Park Royal. - Encourage standardisation and co-ordination of procedures around waste and recycling to prevent confusion and duplication especially where developments cross borough boundaries. - Provide green roofs and walls and green public spaces that will absorb water, rather than using concrete / hard surface materials and will reduce air pollutant concentrations. - Deliver building heights in range from 5 to 10 storeys except where tower heights are warranted. - Sustain the character of existing and stable residential neighbourhoods through avoidance of high rise development. Harmonise the siting, scale, bulk and height of new development to sensitive locations and views. - Achieve London Plan density ranges in mansion blocks as a sensitive alternative to high-rise development. Demonstrate that high density

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								does not mean high rise. - Adhere to London Plan supplementary planning guidance on the control of dust and emissions during construction and demolition. - Rigorously monitor (with the boroughs) processes and responses to any detrimental impact of existing and any increased levels of air pollution. 3. Increase the life chances of residents, particularly those of relatively deprived areas in and around the OPDC area, via an integrated approach to skills, training and apprenticeships through to longer-term skilled employment. - Sustain and evolve economic activities and employment in existing industry of the Strategic Industrial Location (SIL) of Park Royal, particularly those that meet the needs of existing more deprived communities in and around the OPDC area. - Build on existing and emerging successful business with clear links to and integration with the Park Royal SIL and to neighbouring opportunities. - Sustain and enhance existing valued services (including hospitals and existing retail shops). - Maximise potential spin off from existing and new academic centres, including Central Middlesex hospital - relating to advanced manufacturing, medical research, robotics.. - Support development of new incubator light industrial units. - Encourage development of further education facilities to support apprenticeship schemes relevant to Park Royal industries. - Protect affordable business units / premises. - Replaced relocated waste sites with appropriate employment (such as light industry, medical research, robotics and production of robotic cars or a science park) and training facilities. - Set targets for the net total of new jobs to be delivered, taking into account the number of jobs lost through displacement. - At least 30% of jobs should be for local people with a target of at least 30% during construction phases and 30% longer term. - Provide local skills training, assessed via needs analysis of communities within and on the boundaries of the OPDC area, to ensure targets are met. - Provide a breakdown of jobs delivered. - Monitor displacement of existing businesses in and around the OPDC area as a result of increases in land values and remedy adverse economic and employment consequences. - Protect or re-provide industrial premises. - Accommodation of displaced businesses from Old Oak to Park Royal should take into consideration the impact of disruption to the existing businesses. This should be addressed at the Employment Land Review for Park Royal. - Protect or re-provide premises for valued local social and community activities and assets. In any case of re-provision should be in close proximity to the communities currently using the facilities. 4. Protect and sensitively enhance existing large-scale natural environmental infrastructure - Wormwood Scrubs and the Grand Union Canal. - Development must not encroach onto Wormwood Scrubs. - Development should not impact negatively on the natural environment and wildlife of Wormwood Scrubs. - Protect the character of Wormwood Scrubs. - Sensitively enhance the ecology and as an area for exercise and recreation with agreement and support by the WS charitable trust; this should not be at the expense of the retention of this unique open space. - Ensure satisfactory, sensitive scale and relationship of new development to the Scrubs. - Ensure no negative impact from new development on the view from WS looking North. - Prevent any route from HS2 Station direct to the Scrubs. - Ensure there is no negative environmental impact on the Scrubs from noise, dust and activity and light as a result of demolition and construction and the development as occupied. - Protect and enhance established green spaces alongside the canal. - Protect and enhance the Grand Union Canal conservation area as a site of importance for nature conservation. - Carry out a full survey of the existing buildings along the canal to ensure that industrial heritage buildings and features are identified and protected. - Create publicly accessible public facilities (including but not exclusively restaurant, cafes and bars) that utilise and enhance the existing heritage, including the canal. - Create a new cultural hub/arts centre within the OPDC area that allow for development of the arts including film, theatre, music and creative arts. - Create facilities for recreation and physical exercise, which might include a unique facility not otherwise available in the area (Eg. Lido, skating rink, tennis etc). - Set back development from the edge of the canal, to ensure it is accessible to everyone and to ensure there is a thriving continuous wildlife corridor. - Set acceptable height of development at no more than two or three storeys. - Provide segregated cycling and pedestrian routes on the canal tow path. - Encourage new basins, side docks and wharfs along the canal in order that development may occur in cul-de-sacs away from the edge of the canal. - Ensure that where possible bridges over the canal are light and pedestrian only.

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								- Provide the potential for facilitating active usages on the canal such as a canoe club. - Exploit potential for use of the canal for transportation of building materials for developments and the servicing of the OPDC and wider areas. - Develop a strategy of very high quality hard and soft landscaping throughout the OPDC area. Hard landscaping should involve a restrained palette of good quality durable materials and there should be extensive tree and shrub planting. 5. Provide appropriate means of transportation and movement around and to and from OPDC area - Apply a user hierarchy with pedestrian priority to provide walkable, lifetime neighbourhoods. - Clearly analyse and plan for the differing requirements arising from Old Oak's function as a major transport hub and its local and neighbourhood provision. - Segregate vehicle, cycling and pedestrian routes – to protect older and disabled people and those walking with small children. - Minimise the scale, complexity and cost of transport infrastructure in the area.?? - Ensure that 30% of jobs are for local people, particularly from deprived sections of the community in and around the OPDC area, including during construction phases to support pedestrian movement to and through the OPDC area. - Address existing transport issues with the boroughs and the Mayor; including – the A40, the route from the A40 into Park Royal and Du Cane Road. - Address the problem of Old Oak Common Lane being the main north-south road in the area. - Involve community members in the planning of bus routes. - Encourage use of public transport particularly to minimise use of taxis, private hire and coaches. - Provide clear and accessible information and signage in rail and underground stations, tunnels and connections including where assistance is available to elderly and disabled users. - Ensure any essential road, pedestrian and cycle 'tunnels' are spacious and provide a secure, safe environment. - Provide contingency plans in the event that HS2 does not go ahead. - Prevent any rail links being close to bedroom windows of residential buildings. - Ensure the high street is accessible only to pedestrians and cyclists with certain essential sections being accessible to buses. - Provide a main eastern entrance to the Old Oak Common HS2 station, with a road connection to Scrubs Lane so as to relieve the use and dependency on Old Oak Common Lane - Maximise use of the Grand Union Canal for transportation of materials through all demolition and construction phases and thereafter the functioning of the development. Provide off-site consolidation facilities and use of prefabricated building components. This aims to reduce already high levels of air pollution and congestion on existing roads and minimise on levels of noise dust and vibration from delivery and servicing
102	2029	Community Group	Jacky Peacock	Harlesden Lets	Spatial vision			Harlesden Lets sees this development as an opportunity to set a new standard in terms of diversity, design of build and affordability of homes. The proposed site will be on a very large scale and could influence future developments both in the UK and around the world. The aim of pioneering international excellence can also be used to create a diverse and inclusive set of neighbourhoods that isn't just about profit but long-term gains in terms of well-being, healthy environments and sustainable development.
102	2063	Community Group	Jacky Peacock	Harlesden Lets	Spatial vision			The amount of land included in the proposed development should allow for a diverse mix and, as stated before, an ideal opportunity to do things differently and be pioneering rather than a continuation of developments that have gone before.
104	2124	Community Group	Del Brenner	Regents Network	Spatial vision			It is unacceptable that the frenzy around the Old Oak honeypot seems to have intensified, with higher residential figures, less open space and parks, bulkier blocks, taller towers, and most likely higher profits, which seem to have won the day, along with exploitation allowed on the fringes.
104	2125	Community Group	Del Brenner	Regents Network	Spatial vision			It is unlikely that it will ever be feasible to attach the title 'neighbourhood' to any location or development pile that is being foisted on to Old Oak, as everything will be dominated by vast and soulless edifices and mega developments, with swingeing services charges, that will have no heart. Where will the sense of community come from?
110	2655	Community Group	Sharon Hayward	Grand Union Alliance	Spatial Vision	Spatial Vision		Grand Union Alliance -A community based vision for the OPDC area The OPDC area has exemplar, sustainable, well-connected and walkable, lifetime neighbourhoods supporting both new and long established residential communities, well-linked with surrounding areas. OPDC neighbourhoods promote cohesive communities, foster diversity, interaction and social capital. They provide the homes, jobs, training, amenities and services that meet the lifetime needs of local communities and comfortably accommodate those who work, spend leisure time or pass through the area. They provide exceptionally high-quality architecture and buildings that relate sensitively to the built and natural environmental qualities of long-established residential and business areas within and surrounding the OPDC area. Valued buildings, features, social facilities and amenities that have had long-term importance to communities' sense of place and history have been retained and integrated into new developments. The life chances of residents in and around the OPDC area are increased through strong local economic activity and employment, supported by an integrated approach to skills, training and apprenticeships through to long-term skilled employment. Long-established Park Royal Strategic Industrial Location businesses are successfully sustained alongside new industry. Start-up workspaces are provided and affordable business premises have been protected. Large-scale natural environmental infrastructure that is valued by both local communities and people across London – specifically

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								Wormwood Scrubs and the Grand Union Canal – has been sensitively enhanced and its integrity has been protected. Nature is thriving throughout and beyond the OPDC area. Appropriate means of transportation and movement in and from the OPDC area put pedestrians central to a user hierarchy. Access to extensive new transport infrastructure sensitively interacts with local neighbourhoods and local transport needs. Key multi-use catalyst buildings which support the local community and are attractive to visitors are situated in Old Oak North. A new historic and cultural hub (focused in part on the physical re-use and memorialisation of the industrial heritage of the area) developed beside the Grand Union Canal. Careful phasing of development has meant that individual neighbourhoods have been completed with an appropriate compliment of social and community infrastructure and amenities. Reasonable protection from undue disruption during construction has been achieved. Detailed coping strategies, around having a transient workforce during of construction phases have assisted in this respect. Local communities have been actively involved early in visioning and planning processes, and continue to play an active role in decision-making in the OPDC area.
116	2793	Community Group	Mark Balaam	West London Line Group	Spatial Vision		Figure 2.2	We would ask that the proposed Westway Circus station is shown on this map and this station is cited throughout the Plan as one that would serve the OPDC's hinterlands. Its provision one stop away from both Hythe Road and the proposed raft above the OOC Hub would be crucial in establishing links between the OPDC Area and this station's catchments in, or close to, the OPDC Region. It is as close, or closer, to the OPDC area as White City, Kensal Green and North Acton stations and is cited in the Local Plans for RBKC and LBHF.

Strategic Policies

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13	51	Developer	Paul Gilfedder	HS2 Ltd.	Strategic Policies			The spatial policies (SP5, SP9 and SP10) as proposed are not justified or effective. These policies require tall, high density development focussed around and close to public transport to create a major new commercial hub around Old Oak Common Station. These policies also require proposals to support the delivery of the spatial vision by enabling a comprehensive and integrated approach to development and infrastructure that supports and brings forward development. These policies are not predicated on evidence that significant amounts of tall, high-density development can be achieved at Old Oak Common station. HS2's current scope is to deliver a naturally ventilated station which initial ventilation modelling has shown not to be able to support tall, high density building both on and adjacent to the station site or on the adjacent Elizabeth Line Depot site. These ventilation studies, along with other similar design development work, have been shared with OPDC. The current scope for Old Oak Common Station cannot deliver the spatial vision for development at Old Oak Common Station, and consequently the vision as drafted by OPDC is not deliverable.
13	53	Developer	Paul Gilfedder	HS2 Ltd.	Strategic Policies; Places	SP7; P1C1	OOC.7	Policy SP7 requires proposals to 'support the delivery of the spatial vision by delivering sufficient transport infrastructure required to support the planned growth in the OPDC area'. The supporting wording in paragraph of OOC.7 in policy P c also refers to station capacity, 'the Act scheme currently sets out that Old Oak Common Station will be designed to provide interchange facilities for 54,366 passengers which does not consider proposed development within the OPDC area. To help inform the design of Old Oak South, TfL have carried out modelling which identifies that approximately 250,000 passengers will interchange within the station and 42,000 passengers will leave the station to interchange with other modes. As such, the layout of the movement routes within and around the station needs to support local permeability and legibility. The station should be designed for nonpreclusion to allow for modifications to enable these routes to be made at a later date'. HS2 Ltd. considers these policies to be unsound as they are neither justified nor effective. These policies require extra works beyond HS2's scope. Such proposals cannot be required through planning policy and the Schedule 7 process. HS2 Ltd.'s current scope is to deliver a station with a capacity of 54,366 passengers in a 3-hour am peak. During the next stage of design we will explore opportunities to not preclude further modifications to the station within the current scope and schedule. Anything other than the Act scheme would require a fresh instruction from the DfT and be for others to fund. For the policies to be sound they should accurately reflect HS2's set scope for station capacity and be more flexible on aspirations for future capacity
13	54	Developer	Paul Gilfedder	HS2 Ltd.	Strategic Policies	SP6		HS2 Ltd. recognises the significant role that station access plays in integrating with the surrounding development. During the parliamentary process, the Secretary of State gave Assurances to Transport for London ("TfL") relating to 'Old Oak Common Connections'. These included non-preclusion and enabling (within HS2 powers and limits) for an Old Oak Common Station Western Pedestrian Link, an Old Oak Common Station Eastern Pedestrian Link and an Old Oak Common Station Eastern Highway Link. These Assurances required HS2 Ltd. to design these links and seek agreement with TfL and OPDC on the design, which has been achieved as per the requirement set out in the Assurance. We will continue to work with TfL and OPDC during the next stage of design of the station to further refine the design of these links. The inclusion of the enabling for the links into the station design is however subject to the caveats that TfL confirms that both funding will be available, and an appropriate application for permissions and powers has been submitted by 3 December 2017 with that the relevant permissions secured by 3 December 2018. HS2 Ltd. will continue to engage and work with OPDC, TfL and the DfT on the planned delivery of these links. Elements of Policy SP6 are therefore a welcome inclusion in the plan as it is broad in its approach requiring proposals to support new connections to Old Oak Common Station if proven feasible and does not affect the timely and cost effective delivery of the station. However, this policy in conjunction with SP6 requires proposals for development and rail infrastructure to support the delivery of the High Street. HS2 Ltd. considers that these policies are unsound on the basis that they are not justified or effective. The High Street (in particular its connection into the Old Oak Common Station site via a bridge over the Elizabeth Line Depot) has not been proven deliverable as it is not supported by any detailed engineering studies or availability of funding. This includes the additional enabling required for a High Street Bridge which is outside of HS2's scope and funding envelope. HS2 Ltd. consider that for these policies to be sound, they need to reflect the wording used in policies P1 and P1C1 when referring to the High Street. Namely, requirements on proposals to explore the opportunities for non-preclusion and support for the delivery of the High Street are only applicable where they are feasible and support the time ly and cost effective delivery of Old Oak Common Station.
14	59	Agent	Leonie Oliva	Deloitte LLP (on behalf of Imperial College)	Strategic Policies	SP1	3.8	Imperial welcomes the inclusion of Policy SP1 in the draft Local Plan, as it serves well as an overarching target for future change across the OPDC area. Of particular interest is Paragraph 3.8, which outlines opportunities for 'joint working' in order to help facilitate such regeneration in the wider region. Imperial acknowledges and supports this statement, as economic synergies will be explored, including the potential for Imperial to continue to grow its West London campus into the OPDC area.
14	60	Agent	Leonie Oliva	Deloitte LLP (on behalf of Imperial College)	Strategic Policies	SP6		Imperial welcomes the recognition in the Policy SP6 supporting text that education uses can act as a catalyst use which draws people into the area and consequently "help it to become a recognised and successful part of London where people want to live, work, visit and play." Imperial agrees that higher education facilities do contribute to this crucial place-making role, whilst supporting the need for place-making efforts in the area.
15	70	Agent	Mark Underwood	Deloitte LLP (on behalf of Diageo)	Strategic Policies	SP5	Figure 3.4	Diageo considers that the Twyford Abbey Road should be included within the Residential Area shading on both of these diagrams.
15	71	Agent	Mark Underwood	Deloitte LLP (on behalf of Diageo)	Strategic Policies	SP8	Figure 3.11	Diageo recognises that the Twyford Abbey Road site is an existing open space as shown in Figure 3.11. Diageo considers that the Lakeside Drive site could provide new open space and could be shown on this diagram. The diagram should also indicate the existing open space around the Diageo lake within the First Central development.

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15	73	Agent	Mark Underwood	Deloitte LLP (on behalf of Diageo)	Strategic Policies	SP10	Figure 3.16	Diageo request that the figure is amended to remove the designation of the Lakeside Drive site as a development site to be brought forward in the next 0-5 years. Diageo does not consider that this strip of land presents a viable opportunity for development. Diageo considers that the diagram should include the Twyford Abbey Road site as a 0-5 year development opportunity.
16	78	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Strategic Policies	SP8		POLICY SP8: Green Infrastructure and Open Space p.36: We strongly support this policy and draw particular attention to: "a) ii) providing sensitive (our emphasis) enhancements and improvements to access existing open spaces iii) appropriately providing and/or contributing to new green infrastructure and open spaces, that meets the needs of the development...including delivering 30% of the developable area outside of Strategic Industrial Locations (SIL) as publicly accessible open space in accordance with Policy EU1, including delivering 3 new local parks in Old Oak, each of at least 2 ha b)i) conserving and enhancing existing biodiversity habitats. Any loss or relocation should accord with...Policy EU2 ii) delivering and/or contributing to new biodiversity habitats d) ensuring that major development proposals are accompanied by a Green Infrastructure and Open Space Strategy and Management Plan SUPPORTING TEXT 3.80 Figure 6.3 identifies the green infrastructure and open space infrastructure assets in the OPDC area including...(SINCs). These spaces should be conserved and enhanced (our emphasis), except for in exceptional circumstances where any loss is considered necessary to facilitate the comprehensive redevelopment of the area and where a proposed development can clearly demonstrate that the functions and benefits of the existing asset are being reproved to a higher standard (see Policies EU1 and EU2). OPDC will support proposals for sensitive enhancements and improved access to existing spaces and will look to secure planning contributions to support this. OPDC will also support enhanced access to existing spaces. " We are gratified to see the proposed delivery of 30% of the developable area outside SOL as open space and three new local parks, the locations of which are identified in figure 3.11. This seems to be an improvement on figure 16 in the last Plan. We cannot conceive of any redevelopment of the area covered by the OPDC that would justify loss to the Scrubs. with regard to enhancement of and improved access to the Scrubs, see our comments on POLICY P12 below.
16	79	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Strategic Policies	SP9		We support in particular : "...optimising development...that delivers buildings...that i) positively responds to context and enhances local character and identity ii) responds appropriately to the setting of sensitive locations identified in figure 3.14, including...open spaces"
16	80	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Strategic Policies	SP9		2.2 We note SUPPORTING TEXT 3.95 "The OPDC area is a suitable location for tall buildings. Tall buildings provide opportunities... However, they can impact on sensitive locations and on microclimate." There are then references to the appropriateness of tall buildings in certain locations identified in the Places chapter and the need to accord with the tall buildings policy D5, followed by: Proposals would also need to assess their impact on key views identified in OPDC's Views Study, as required by Policy D7 (Key Views). The Views Study identifies three views under "Wormwood Scrubs Character Area": 12. Long views north east from Wormwood Scrubs, between trees, 13. north east from Wormwood Scrubs 14. north east from central Wormwood Scrubs. They are all classified in the Study as "potential heritage views", the description of which includes "views of heritage assets, either buildings or areas where the subject has some landmark significance and relevance from a place-making perspective", "panoramic views" and "general views from Wormwood Scrubs". "Heritage asset" is defined in the Glossary to this Plan as including "...Areas of Local Character", and "Local Character Area" is in turn defined as "Small local areas, as identified in the OPDC Heritage Strategy and OPDC Character Areas Study". Finally the Heritage Strategy lists the Scrubs as a "Character Area" and it is included in the OPDC Character Areas Study. Hence the views from the Scrubs amply qualify for protection. Guidelines in the Views Study for views 12, 13 and 14 state "test any proposals for tall buildings in this view and carry out a landscape and visual impact analysis". We suggest either as an addition to 3.95 or within P12 (Wormwood Scrubs) or POLICY D7 (Key Views): In accordance with the Views Study, the views from Wormwood Scrubs should be given appropriate protection. Without such protection, Policies SP9 (Built Environment), D7 (Key Views) and P12 (Wormwood Scrubs) are not justified. In our response to the last Plan we argued for an unambiguous statement that buildings between the northern edge of the Scrubs and the Station should be of the lowest height. Our argument is supported by the Views Study, extracts from which we have cited above, as well as the definitions of the Scrubs as a heritage asset and Character Area. We repeat our plea for such a statement in the final submission draft Local Plan (and see 3.10 below). Such a statement is needed to justify Policy SP9.
19	133	Strategic Partner	Raymond Gill	The Inland Waterways Association- Middlesex Branch	Strategic Policies	SP7		The proposed Old Oak High Street carves through the centre of the Old Oak area and crosses the Grand Union Canal at a point that bisects the Birchwood Nature Reserve. The proposed alignment of Old Oak High Street has a number of problems that will impact on the environment of the canal: 1 The bridge crossing is not compatible with the proposed retention of the nature reserve as a local park. 2 Primary shopping areas along the High Street will be damaging to the adjacent Grand Union linear park. 3 Early delivery of Old Oak High Street (Policy SP7iii) will not be possible due to the continued existence of the Crossrail Depot. As a result the proposed Old Oak High Street will not in the period after 2026 provide a 'seamless' connection between the five stations of Old Oak (Policy SP7ii) and nor will it deliver 'continuity' (Policy SP7iv).

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								4 In practical terms the proposed Old Oak High Street is likely to be implemented in a series of disconnected streets constructed over a twenty-year or longer period. This will ruin any hope of the street providing its intended strategic purpose and will impact on the financial viability of commercial and retail development along the route. Supporting text 3.67 concedes that complete delivery of the High Street may take many years. We consider that the main north–south route between Willesden Junction and Old Oak Common Station should be on the alignment of the proposed Park Road bridge over the canal. The Old Oak High Street route should be expediently abandoned by the AECOM masterplan design team as unworkable while the Crossrail Depot remains at Old Oak. The proposed crossing of the canal by the new Grand Union Street will provide the essential connection between Old Oak Common Station and the new station at Hythe Road. This approach would bring the proposed street pattern more in line with the 2011 masterplan prepared for the London Borough of Hammersmith and Fulham which, although indicative, demonstrates a more rational and comprehensible strategy for connecting up the two parts of Old Oak than the proposed convoluted street network presented in the Local Plan
19	134	Strategic Partner	Raymond Gill	The Inland Waterways Association- Middlesex Branch	Strategic Policies	SP7		Whilst we recognise the need to create new routes connecting the north and south areas of Old Oak we believe the number of bridge crossings over the canal should be minimised so that the canal still has the opportunity to form a true parkland corridor at the heart of Old Oak. Currently between Scrubs Lane and Old Oak Lane there are four bridges over the canal (three rail bridges and one foot bridge). Policy SP7 proposes a total of seven bridges (three existing rail bridges, three new road bridges and one new footbridge) over the canal in the 1.3km distance between Scrubs Lane and Old Oak Lane. This proliferation of bridges over such a short distance will effectively prevent the design and implementation of a linear park along the Grand Union Canal. We note that none of the illustrations in the supporting Precedents Study show a successful canal park with vehicular bridges in such close proximity to each other.
19	135	Strategic Partner	Raymond Gill	The Inland Waterways Association- Middlesex Branch	Strategic Policies	SP7	3.76	We welcome the supporting text (SP7 3.76) that OPDC is working with the Canal and River Trust, TfL, local authorities and developers to consider the potential for increased waterborne movement, including freight on the Grand Union Canal.
19	136	Strategic Partner	Raymond Gill	The Inland Waterways Association- Middlesex Branch	Strategic Policies	SP8		The IWA welcomes the recognition that green spaces (including water spaces) are an essential part of the development (Policy SP8) and that green infrastructure needs to be carefully designed and integrated into the area. The OPDC development area fortunately includes some notable green and water spaces, including the Grand Union Canal, as well as adjacent spaces such as St. Mary's and Kensal Cemetery. The draft Local Plan envisages the creation of a Linear Park along the Grand Union Canal (Fig 3.11). This shows the park extending along both the north and south side of the Canal where it passes through the Old Oak area, extending eastward to St. Mary's Cemetery. To the west of Old Oak the park is shown as occupying only the southern side of the canal. The draft Local Plan recognizes the varied existing environments through which the canal corridor passes – from relatively green and open aspects to more enclosed, industrial landscapes with restricted width on either side. At present the towpath - with attendant use by the boating community, pedestrians and cyclists – occupies the southern bank of the canal. The northern bank typically has industrial and distribution buildings located close to or immediately adjacent to the canal edge. We suggest the creation of a linear park along both banks of the canal for the entire length of the OPDC development area. The importance of this vision was recognized in the Vision document produced by Farrells for the London Borough of Hammersmith and Fulham in 2011. This describes the green backbone of the Grand Union Canal and the green lung of Wormwood Scrubs.
19	137	Strategic Partner	Raymond Gill	The Inland Waterways Association- Middlesex Branch	Strategic Policies	SP9		In Policy SP9: Built Environment we welcome the recognition of the canal corridor through the entire OPDC area as a sensitive location (SP9 Figure 3.14) and Policy SP9 a.ii requiring buildings and infrastructure to respond appropriately to the setting of sensitive locations. Supporting text (SP9 3.96) states that development will be expected to respond appropriately to the Grand Union Canal as a heritage asset. However we are concerned that this policy is not correctly pursued in the Grand Union Canal Massing and Enclosure Note (April 2017).
24	190	Agent	Harriet Barber MRTPI	Montagu Evans (on behalf of T.A.S.B. Investments Limited)	Strategic Policies	SP1 SP2		Chapter 3 of the OPDC Local Plan: Revised Draft sets out a number of strategic policies to guide development across the OPDC area within the plan period (2018-38). T.A.S.B. Investments Limited recognises the need for a strategic approach to development and support the strategic policies outlined within Chapter 3, particularly the requirement for the provision of a range of land uses under Policy SP1 (Catalyst for Growth) and the need for proposals to establish high standards for sustainable development at appropriately high densities under Policy SP2 (Good Growth).
24	191	Agent	Harriet Barber MRTPI	Montagu Evans (on behalf of T.A.S.B. Investments Limited)	Strategic Policies	SP6		T.A.S.B. Investments Limited further acknowledges the need to support a coordinated and phased approach to place making and the importance of delivering and supporting a new town centre hierarchy, including the creation of a neighbourhood town centre (Park Royal Centre) at the heart of the Park Royal Industrial Estate, as outlined under Policy SP6 (Places and Destinations).
27	216	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Strategic Policies	SP9	Figure 3.14	The plan shows part of the site at Midland Gate as an existing residential area whereas the site has a recent history of commercial use. The residential notation should be amended accordingly.
28	240	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Strategic Policies	SP1	Figure 3.1	The West London Line terminates at Willesden Junction. The labelling of local rail services alongside the West Coast Main Line to Watford Junction should be amended to read London Overground.
28	241	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Strategic Policies	SP1	3.8	Kensal Canalside – TfL's concern is that a potential Elizabeth line station or one on the main line in this location would be extremely challenging to bring forward, both technically and in terms of value for money. Therefore other non-rail interventions may be more suitable for bringing forward development. You will be aware that the Royal Borough of Kensington and Chelsea has commissioned a study to consider the feasibility of this station which is due to report next year. The wording in the Plan should reflect these uncertainties.

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28	242	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Strategic Policies	SP1	Figure 3.3	The inclusion of potential London Overground stations at Old Oak Common Lane and Hythe Road (but not the new HS2/Great Western Main Line (GWML)/Elizabeth line station) is potentially misleading because these stations do not form part of the existing transport infrastructure.
28	243	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Strategic Policies	SP2		Transport is a key consideration of Good Growth. Transport principles of Good Growth are set out in the draft MTS (Chapter 5). A reference to transport principles of Good Growth should be included in the policy and the supporting text with cross-references to the transport chapter.
28	244	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Strategic Policies	SP3		A requirement to support the Healthy Streets approach including adoption of the Healthy Streets Check and the importance of encouraging active and sustainable travel should be included as a core part of this policy. Cross references in the accompanying text should be made to policy T1 in the Transport chapter which also refers to the Streets Toolkit.
28	245	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Strategic Policies	SP6 SP7		The text referring to the High Street in this section and in the Places chapter should more closely reflect the recommendations in the strategic assessment carried out as part of the Public Realm, Walking and Cycling Strategy - i.e. that it is subject to a feasibility study.
28	246	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Strategic Policies	SP6	3.53	The wording in paragraph 3.53 refers to 'Atlas Junction station' – there is no station here so the wording needs to be amended to reflect that only North Acton is a station in this context.
28	247	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Strategic Policies	SP7		Transport Hierarchy – The transport hierarchy implies that pedestrians and cyclists should be prioritised ahead of public transport. TfL would prefer this to emphasise that there should be priority for pedestrians, cyclists and buses in the overall strategy for roads to ensure consistency with the approach taken in the draft MTS, which sets an overall mode share target for sustainable modes. Supporting active modes is clearly a key priority but the MTS acknowledges that journey distance plays a role in mode choice and identifies public transport as the preferred transport mode for trips that are too long to walk or cycle.
28	248	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Strategic Policies	SP7		TfL recommends that the draft MTS policy for mode shift away from the car (including the target for an 80% non-car mode share) and a restraint based approach to car parking for new development (including encouragement of car free development) is incorporated in Strategic Policy SP7 with cross-reference to the transport section included. While mode shift and parking are referred to in Policy T4, TfL considers that these are strategic policy matters and thus should be accorded appropriate status in the Plan.
28	249	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Strategic Policies	SP7	b.iv	TfL recommends that Policy b) part iv could be strengthened; beyond minimising the need for use of private vehicles, OPDC should actively discourage their use including through the respective Borough traffic reduction strategies, consistent with the draft MTS.
28	250	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Strategic Policies	SP7		TfL recommends that the need to improve road user safety, and accessibility should be included in Strategic Policy SP7 as these are key Mayoral priorities. Improvements to connectivity and maximising permeability whilst overcoming existing barriers to movements should also be included.
28	251	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Strategic Policies	SP7	Figure 3.8	The key correctly identifies Elizabeth line as the name for services that will operate when Crossrail is complete but the notation on the map also needs to be updated
28	252	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Strategic Policies	SP7	Figure 3.8	TfL recommends that link colour and terminology is used consistently for all images for easy reference. For example Grand Union Street is indicated in orange in Figure 3.8 and in grey on Figure 4.2 on p.52.
28	253	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Strategic Policies	SP7	3.70	The implications of Park Road being available for use by all modes of traffic between Old Oak Common Lane and Scrubs Lane will need to be subject to further traffic modelling and assessment. It is likely to be necessary to introduce access restrictions and/or public transport priority measures to manage the amount of through vehicle traffic using this route.
28	254	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Strategic Policies	SP7		The policy should additionally mention the important role of facilitating and managing efficient servicing and delivery activities in line with the draft MTS. Freight transport is important in sustaining the economic vitality of Park Royal and given the high construction activity in the OPDC area, specific measures that will help reduce both construction related freight and delivery and servicing vehicle km together should be facilitated and promoted in Strategic Policy SP7 with a cross reference to Policy T7 in the transport chapter
28	255	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Strategic Policies	SP10	3.103 Figure 3.16	As noted above, future commercial and residential development in conjunction with continuing operational use of the Elizabeth line depot site in reality could only come forward beyond the current Local Plan period. While the longer term aspiration is understood, references to the Elizabeth Line depot site being delivered as part of the current Local Plan should therefore be removed. Figure 3.16 (Development Phasing) would also need to be amended to show that delivery of the depot site cannot be assured within the current Local Plan period.
30	322	Local Authority	Steve Barton	London Borough of Ealing	Strategic Policies	SP5		While the bulk of the Plan's development proposals are focussed on Old Oak, the majority of OPDC's area is made up of Park Royal SIL and is expected to be intensified in its current, industrial, use. The reasons for this are predominantly strategic, responding to needs and supporting business activity across London with a particularly close relationship to both Heathrow and the Central Activities Zone. The broader policy framework that supports this role, however, is in a state of failure that was reinforced by the publication in July of the London Industrial Land Demand Study 2017, which shows industrial release running at around three times the benchmark figure. The study also emphasises that, even without consideration of residential need for land, flexibility in the application of SIL policy is essential to achieve intensification (p215). OPDC has done much to anticipate the outcomes of this study, co-operating with the Boroughs on the Park Royal Atlas, and producing the first detailed industrial intensification study in London. However, this remains as yet a headline approach to what is a detailed problem, and it is important to highlight three key considerations; - SIL is a development designation. While reference to 'protection' may be unavoidable in some circumstances, the LILDS makes clear, the need to make London's Industrial Land work harder in a way that current policy has failed to accomplish. - There is a strong spatial aspect to intensification; it will generally occur in areas of good public transport accessibility such as Park Royal

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								Station, Old Park Royal (which is walkable from North Acton Station), and, most notably in the OPDC area, a cleared and remediated Channel Gate. The exception is logistics intensification which will generally seek good road transport connections, but which is therefore also spatially linked. - Not all industrial sites will intensify, there needs to be a catalyst. Many of these catalysts will be spatial such as improved transport links, but some may also be thematic rated to particular shifts in industrial practice or funding programmes. It would be helpful therefore to see the Plan set out more of a lead on intensification starting with some suggestion of where in particular it may occur. It is likely that the Channel Gate is an obvious location for explicitly new industrial forms which offer a step change in density, but the plan should also be alert to the increase in development potential of all accessible SIL land particularly where it borders Old Oak/North Acton. Once the strategy for Old Oak is established it is hoped that there will be the opportunity for further detailed planning work on the development and management of Park Royal. Ealing looks forward to continuing co-operation with OPDC on this fundamental cross-boundary issue.
30	360	Local Authority	Steve Barton	London Borough of Ealing	Strategic Policies	SP9	Figure 3.14	'Nationally listed' should be 'statutory listed'
33	405	Strategic Partner	Mark Furnish	Sport England	Strategic Policies	SP3		In relation to Policy SP3: Improving Healthy and Reduction Health Inequalities, Sport England supports health having its own policy that would highlight the importance of creating active and healthy communities, especially given the current health inequalities in the area. As mentioned above in relation to Active Design, the layout of development is key to healthy lifestyles as is ensuring the right facilities are provided in the right places (as recognised in paragraph 3.19) but formal sporting facilities, such as playing fields, Artificial Grass Pitches, leisure centres etc. also have a significant contribution. There is almost no mention of these facilities therefore Sport England would like the Draft Local Plan to have specific acknowledgments of playing field and built sports facilities as it appears that there has been limited consideration of these types of important facilities to assist in creating healthy communities.
33	406	Strategic Partner	Mark Furnish	Sport England	Strategic Policies	SP8		Policy SP8: Green Infrastructure and Open Space does not recognise the function some open spaces have in providing sport and recreation, in particular formal sport. Wormwood Scrubs has many playing pitches which, without robust and up-to-date evidence base indicating otherwise, should be protected. The provision of new open space is likely to need to accommodate playing pitches which should be highlighted in an overriding open space policy.
33	426	Strategic Partner	Mark Furnish	Sport England	Strategic Policies	SP3		Overall, Sport England welcome the importance that appears to be placed on health and wellbeing and that the Draft Local Plan has some synergy within the principles of Active Design. Sport England would recommend that these links are strengthened by including Active Design with the Policies and supporting text as highlighted above. However, Sport England does have significant concerns with the Draft Local Plan in its current form and the lack of appropriate strategies and evidence base. OPDC does not have a robust evidence base to inform its sport and leisure policies and therefore they are overly vague and would not adequate plan for sport and recreation. OPDC should develop robust and up-to-date Playing Pitch and Built Facility strategies that, amongst others, clearly sets out the playing pitch and built sports facilities required, and where they are required, to meet current and future demand for the area. The recommendations of these strategies should inform the Local Plan and the Infrastructure Development Plan. In addition, the Local Plan should have separate policies for built/indoor facilities and outdoor facilities/playing fields rather than a vague sports and leisure policy which is possibly supplemented by an open space policy that does not mention informal and formal sport provision. Sport England does not consider, at present, that the approach taken by OPDC in the Draft Local Plan positivity, and adequately, plans for sport. Sport England, therefore, does not consider that the Draft Local Plan is positively prepared or is consistent with national policy consequently and therefore objects to the Draft Local Plan. Sport England would be happy to work with OPDC to address this situation and positively plan for sport and recreation for the Old Oak and Park Royal Regeneration Area. Please do not hesitate to contact the undersigned for advice or answer any queries.
35	432	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Strategic Policies	SP1		The new Old Oak Common Station will be a catalyst for growth; however, this is some years off delivery. In the interim, there will be other developments that can have a catalytic effect. An example of this would be the delivery of a new bridge connection to an improved Willesden Junction Station. As noted, this would open up the regeneration area to the north of the Grand Union Canal, significantly improve the PTAL rating of the area and allow significant early new development of housing and commercial space. This potential for early interim catalysts for growth should be acknowledged in the Policy and the supporting text.
35	433	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Strategic Policies	SP4		We support the aims of this Policy, but would encourage the OPDC to work with partners, including QPR and SCD, to deliver as much early development as possible.
35	434	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Strategic Policies	SP6		The supporting text of this Policy should acknowledge the early role the development of Oaklands will have in delivering regeneration and beginning the process of integrating new development with the existing community at Atlas Junction.
35	435	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers)	Strategic Policies	SP7		The supporting text of this Policy should acknowledge the potential for the early delivery of a new bridge link from EMR to an improved Willesden Junction Station, which will provide an essential part of Old Oak High Street and act as a catalyst for early development in Old Oak North. Additionally, the development of Park Road, the first part of which will be delivered in conjunction with Oaklands, can be progressed

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				Football Club and Stadium Capital Developments)				through the continued development of Oaklands North and the delivery of a new bridge over the Grand Union Canal to open up development in Old Oak North.
35	436	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Strategic Policies	SP10	Figure 3.16	We note the OPDC's development trajectory referred to in this Policy and set out in Figure 3.16. We believe that through collaborative working with the OPDC and other key stakeholders, QPR and SCD can assist in improving this trajectory by bringing forward early development on the land within which they have interests. The development of Oaklands North could come forward in the 0-5 year time frame. If the bridge links to Willesden Junction Station from EMR and the extension of Park Road from Oaklands over the Grand Union Canal are progressed, development in Old Oak North could also commence in the 0-5 year horizon. Furthermore, additional early development can be achieved along Scrubs Lane.
36	463	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Strategic Policies	SP6		The Mayor supports the ambitions for Old Oak High Street to become a major town centre and this is supported by the evidence produced. The Mayor will consider including Old Oak High Street as an emerging or potential major town centre in his draft London Plan.
36	464	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Strategic Policies			The Mayor welcomes the positively planned approach to the provision on green infrastructure and open space as well as physical and social infrastructure.
36	477	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Strategic Policies			The positive references to Good Growth and Healthy Streets are welcomed. The Strategic Policies should also emphasise key Mayoral priorities related to this and set out in the draft Mayor's Transport Strategy including targets for mode shift, a restraint based approach to parking, the need to improve road user safety, accessibility and connectivity and to maximise permeability.
37	487	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	Strategic policies			On the whole, we believe the strategic policies of the plan provide a realistic set of principles on how the Old Oak and Park Royal Development Corporation (OPDC) will achieve the plan's vision for the area in 20 years' time. ACE is particularly supportive of the aspirations for Old Oak and Park Royal to have well-designed and innovative developments. We also support OPDC's desire to assess development proposals through a 'place making' lens.
37	494	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	Strategic policies	SP1		We agree that developments in the area, particularly the delivery of a new strategic transport hub and interchange at Old Oak Common, will be positive and have a knock-on effect for the wider West London sub-region.OPDC have appropriately identified a number of opportunity areas in the region from developments, such as White City and Wembley. It will be important for OPDC to remain cognisant of these other opportunity areas during the plan's period to ensure developments are successfully integrated into the wider community, and impacts on other areas are positive.
37	495	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	Strategic policies	SP2		We believe OPDC's 'Good Growth' policy is well considered and positive. We are pleased to see the plan promote the concept of place making and to make the connection between good quality and well-designed developments and pride in a community. ACE notes that community engagement is an important component of successful place making. We therefore support OPDC's commitment to develop and regularly update a Statement of Community Involvement throughout the plan's period. Smart infrastructure will be critical for the area's success and to meet the objectives of a forward-looking innovative community. We support OPDC's development of a Smart Strategy and believe it's successful implementation is instrumental for achieving good growth in the area.
37	496	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	Strategic policies	SP4		The target of a minimum of 22,350 additional homes between 2018-38 and a 50% affordable housing target is positive, however we believe OPDC could aim for more housing in the area. Further information could also be provided on how OPDC will strategically influence and encourage proposals to meet these targets. ACE also agrees that social infrastructure plays an important role in thriving communities. We are therefore pleased with OPDC's commitment to work with developers and service providers to ensure new and improved facilities meet the needs arising from future developments in the area. ACE is very focused on how consulting engineers can contribute to place making, and how the built environment can help communities thrive. ACE has recently commenced work seeking to establish an All-Party Parliamentary Group on Building Community, and would be very interested in engaging further with OPDC on this topic.
37	497	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	Strategic policies	SP6		ACE agrees that the relatively small size of the area (650 hectares) does highlight the importance of having well planned places and clusters. We therefore support the approach that OPDC have taken with a town centre hierarchy. ACE is excited by OPDC's ambitions for the proposed Old Oak High Street and agrees that it has the potential to become a significant destination in London. The success of the high street will also be critical for other developments in the area. High quality designs that focus on the 'healthy streets' approach will help ensure the proposed Old Oak High Street is a success. ACE believes the purpose of a place and destination is critical to its long-term success. An area needs a driver and core activities to be a successful, as this creates a pull factor for the location. For example, the focus on the finance industry in Canary Wharf and the legacy of the 2012 Olympics in Stratford have been critical to their ongoing success. ACE believes the proposed Old Oak High Street could follow a similar path, for example through a focus on high-tech innovation or modern manufacturing.
37	498	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	Strategic policies	SP9		ACE agrees with OPDC's view that the built environment is an important determinant in how well a society integrates. Developments that are high quality designs and fit for purpose can improve quality of life, increase productivity and enhance health and well-being. Old Oak and Park Royal provide a unique opportunity to embrace this outlook on a large scale and optimise benefits from regeneration and growth in the area.We also support OPDC's approach for high density development and tall buildings. ACE believes it is logical to take advantage of excellent transport connections by delivering high density developments and tall buildings in the locations identified in this plan. However, as noted in GLA's 'healthy streets' approach, people need to be at the heart of the built environment and any development decision, such as a high density or tall building proposal.
39	507	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Genesis)	Strategic policies	SP4		Genesis supports the aims of this Policy and is keen to work with the OPDC to deliver as much early development as possible.
39	508	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Genesis)	Strategic policies	SP6		The supporting text of this Policy should acknowledge the early role the development of Oaklands South will have in delivering regeneration and beginning the process of integrating new development with the existing community at Atlas Junction.
39	509	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Genesis)	Strategic policies	SP7		The supporting text of this Policy should acknowledge the potential for the early construction of Park Road, the first part of which will be delivered by Genesis in conjunction with QPR at Oaklands South. This can be continued through the development of Oaklands North and the delivery of a new bridgeover the Grand Union Canal to open up development in Old Oak North. Genesis sees this as a key deliverable and is keen to work with the OPDC to identify how the bridge can be constructed at the earliest opportunity.

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39	510	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Genesis)	Strategic policies	SP10	3.16	Genesis notes the OPDC's development trajectory referred to in this Policy and set out in Figure 3.16. Genesis believes that through collaborative working with the OPDC and other key stakeholders, it can assist in improving this trajectory. For example, the development of Oaklands North could come forward within 5 years and Genesis has set out to the OPDC a proposal for working in partnership to deliver this as quickly as possible.
42	543	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Strategic policies	SP2	3.11	Paragraph 3.11 in the supporting text to this policy includes reference to some hard-to-define concepts, including community cohesion and empowerment, safety and security and respect of diversity. Overall we feel that this is essentially supporting mixed tenure and type of homes, but we would suggest avoiding the use of concepts which do not have a clear definition.
42	544	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Strategic policies	SP4	3.25	We wish to note that the overarching target to provide 50% affordable housing is very ambitious, but we welcome the recognition in 3.25 that developing land in the OPDC area is complex – in particular given the level of infrastructure needed to support any development. Where major development schemes such as OOP are required to provide significant new infrastructure, there needs to be a very clear recognition throughout the Local Plan that this will necessarily reduce the level of affordable housing that can be supported. However, we will work with the OPDC and other stakeholders to identify and maximise the potential benefits to promoting lifetime neighbourhoods, social cohesion and community integration within a viable development scheme.
42	545	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Strategic policies	SP5		Whilst we recognize and strongly support the aspiration for the London Living Wage, we question the appropriateness of including this as a requirement within a development plan policy, and do not consider that the planning system is necessarily the appropriate way in which to control workers' pay and conditions.
42	546	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Strategic policies	SP6		We support the introduction of a separate place for Willesden Junction.
42	547	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Strategic policies	SP6	3.44	3.44 refers to meanwhile uses, and states an intention (through Policy TCC9) to require developers to accept mechanisms that protect meanwhile use operators. The real attraction of meanwhile uses for developers is that they are temporary and do not hinder or impact upon the permanent development. Requiring the retention of operators brought in for a meanwhile use in a permanent scheme will dissuade developers from proposing them. It assumes that the type of space required for a meanwhile use is compatible with the end proposals, which is a significant assumption and would constrain either or both elements. We would consequently suggest a much less prescriptive and interventionist approach to meanwhile uses – we would suggest that the OPDC should support and encourage rather than control them to this degree. 3.51 indicates that a delivery programme will be 'set' for Old Oak High Street so that it aligns with the delivery of homes and jobs. We would suggest that there will be very many phasing considerations, some of which will be known early on and others which will not be known until delivery stage, and would encourage a less prescriptive approach to delivering the new town centre uses once all influencing factors are known and understood.
42	548	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Strategic policies	SP6	3.51	3.51 indicates that a delivery programme will be 'set' for Old Oak High Street so that it aligns with the delivery of homes and jobs. We would suggest that there will be very many phasing considerations, some of which will be known early on and others which will not be known until delivery stage, and would encourage a less prescriptive approach to delivering the new town centre uses once all influencing factors are known and understood.
42	549	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Strategic policies	SP7	h), 3.70	Part h) of the policy (as well as at 3.70 in the supporting text) refers to Park Road as an 'early all modes connection'. This is at odds with our understanding of the longer term intentions for Park Road, and so we would welcome clarity on this point.
42	550	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Strategic policies	SP7	3.8	Figure 3.8: Proposed connections indicates two connections to Scrubs Lane at Park Road and Grand Union Street. The emerging OOP masterplan only requires one vehicular connection to Scrubs Lane and so we would suggest clarification of this diagram. This position is reflected in Figure 4.12.
42	551	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Strategic policies	SP9	3.14	The Local Plan (informed by the Heritage Strategy) at figure 3.14 identifies the proposal to allocate a number of buildings as undesignated heritage assets in NPPF terminology. Within the OOP site, this includes 18-19 Hythe Road, the Hythe Road electricity sub-station, the former Rolls Royce Factory, 44 Hythe Road and the former Gate and Shutter works to the south of 1-10 Enterprise Way which are proposed to become locally listed buildings. It also identifies Europa Studios as a 'Proposed other building of heritage interest'. This final designation is unclear and unhelpful – it either merits being locally listed or it does not, given that the NPPF only differentiates between designated and non-designated heritage assets. We consequently suggest that it should not be designated.
42	552	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Strategic policies	SP9	a)ii)	We would suggest that part a)ii) of the policy does not acknowledge that some (if not most) of these buildings are likely to be demolished as part of the area's comprehensive redevelopment, in that it refers only to 'responding appropriately to their setting'. The policy should acknowledge that if the loss of these assets is proposed, justification is required in accordance with policy D8.
42	553	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Strategic policies	SP10	3.108, 3.109	We welcome the recognition at 3.108 and 3.109 that developers will be required to contribute 'appropriately and proportionately' towards social and physical infrastructure. Whilst the 'equalisation mechanism' is only mentioned at 3.109 in connection with different landowning interests, it should also be recognized that there will need to be an equalization between early sites that come forward ahead of new infrastructure yet rely on it, and later developments which provide the new infrastructure

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								to support the overall development capacity in the area. We consider that this is critical so as to avoid an inappropriate burden being placed on sites such as OOP.
43	611	Planning Consultant	Hannah Willcock	DP9 (on behalf of A40 Data Centre B.V)	Strategic policies	SP2	c)	We are supportive of the principles set out in Policy SP2 (Good Growth), particularly the reference made to new proposals supporting the delivery of the spatial vision by establishing high standards for sustainable development at appropriately high densities and delivering high standards of place making, urban design and architecture.
43	612	Planning Consultant	Hannah Willcock	DP9 (on behalf of A40 Data Centre B.V)	Strategic Policies	SP2	3.13	The supplementary text of SP2 in paragraph 3.13 outlines that “high density in Park Royal will be different to in Old Oak, but OPDC’s Park Royal Intensification Study demonstrates how the Park Royal Industrial Estate could be regenerated to increase floorspace and provide additional jobs, to support Mayoral targets to deliver an additional 10,000 jobs across the estate.” We think it is important to note that whilst the Intensification Study does demonstrate how Park Royal Estate could be regenerated to increase floorspace, this document largely focusses on increasing SIL floorspace by providing ‘multi typology’ SIL uses and it should be recognised that not all sites (particularly those which are of smaller footprints) may be suitable for SIL uses above two storeys.
43	613	Planning Consultant	Hannah Willcock	DP9 (on behalf of A40 Data Centre B.V)	Strategic Policies	SP9	3.87	In principle, we support the spatial policy SP9 which expands on SP2 and states that “proposals should support the delivery of spatial vision by optimising development in a sustainable manner.” We agree with the supplementary text outlined in 3.87 that the development of the area needs to be optimised to fully capture and realise benefits of regeneration and growth. These representations expand on this point further in the next section.
43	614	Planning Consultant	Hannah Willcock	DP9 (on behalf of A40 Data Centre B.V)	Strategic Policies	SP9	iii), 3.88	SP9 iii states that proposals should ensure appropriate standards of amenity. Supplementary text in paragraph 3.38 reinforces this by stating that the OPDC will set high standards for design quality and architecture.
43	615	Planning Consultant	Hannah Willcock	DP9 (on behalf of A40 Data Centre B.V)	Strategic Policies	SP9	iii)	In addition, design quality means different things to different people, in particular around architectural treatment and building height. It should be noted that both design and conditions on planning permissions can control key amenity elements, such as noise pollution. Thus, in the right location and with the right design and planning controls SIL uses can be located next to or directly above or below non SIL uses
44	631	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Strategic policies	SP3		There is the opportunity in OPDC to create an ‘exemplar healthy and sustainable large-scale development’ (Spatial Vision 6) and while we support Policy SP3, it is unclear how this will be achieved in a coordinated way given the numerous development sites and multiple land ownership. Whilst Health Impact Assessments are a useful tool to assess the impacts of individual developments, we suggest that a set of principles could be established to support and coordinate innovation and good practice in promoting healthy lifestyles and service design across the OPDC area. It is noted that the previous draft Regulation 18 policy on health (Policy SI3) supported the delivery of a ‘Healthy New Town’ to encourage healthy living and innovation in health and whilst not a designated Healthy New Town a similar set of principles could be developed.
44	633	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Strategic policies	SP3		Whilst Policy SP3 refers to promoting health and wellbeing it could also emphasise the need to address adverse environmental impacts and make links to policies on air quality (Policy EU4), noise and vibration (Policy EU5) and land contamination (Policy EU13). This will be particularly important in Old Oak North and South where new sensitive uses such as residential uses will be introduced close to existing rail and utility uses.
44	634	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Strategic policies	SP3		During the construction stage with development proposals and utility works underway there is the need to coordinate Construction Management Plans and mitigation measures to minimise the impact on existing and emerging new communities and to address other issues such as emergency preparedness and workplace health (See Policy T8 Construction)
44	635	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Strategic policies	SP3	d), 3.23	We support criterion d) which require Health Impact Assessments (HIAs) as part of major development proposals to be carried out at the earliest possible stage (paragraph 3.23).
44	637	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Strategic policies	SP3		We also suggest that the supporting text could refer to role of Environmental Impact Assessment (EIA) to address population and human health. Public health teams have an important role to engage in the EIA process – see https://www.gov.uk/government/publications/health-and-environmental-impact-assessment-guide-for-local-teams
44	638	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Strategic policies	SP7		We support the emphasis on connectivity in Policy SP7 which is a key issue to ensure movement across the area overcoming major physical barriers such as the rail corridor, canal and large open spaces. Connectivity is a key issue in terms of access to services, physical activity and social cohesion linking new communities with Harlesden and Stonebridge and parts of Acton, which are amongst the most deprived areas in London.
44	639	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Strategic policies	SP10		Of critical importance is the creation of the Old Oak High Street which requires integrated delivery (Policy SP10) and collaboration between OPDC, developers, service providers and other stakeholders (see Policy SP10)
45	643	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Strategic policies	SP7		We acknowledge and support the fact that Scrubs Lane is recognised as an important location for early development phases and development along these routes will play a key role in helping to knit together existing and new communities in the area.
46	658	Planning Consultant	Mark Powney MRTPI	Boyer Planning (on behalf of Raban Goodhall Ltd)	Strategic policies	SP5	3.4	Earlier versions of OPDC Local Plan had incorrectly indicated the site as being in industrial use. We appreciate the latest version of the Local Plan correcting this error and now correctly indicating the site as being in residential use.
46	660	Planning Consultant	Mark Powney MRTPI	Boyer Planning (on behalf of Raban Goodhall Ltd)	Strategic policies	SP5	a)	One of the key foundations of the proposed Local Plan is protecting the SIL in Park Royal for continued and intensified industrial use; while in Old Oak, land is being de-designated from SIL (87 hectares) in order to support the redevelopment of new homes and jobs alongside new town centres and upgraded transport infrastructure. While we agree with these broad principles; our major concern is that the Local Plan

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								seemingly ignores the redevelopment potential of our client's site which itself is located in close proximity to major public transport infrastructure as well as existing and proposed town centre activities. Rather than be promoted for redevelopment in recognition of its favourable location it suffers from a status quo approach within the Local Plan.
47	678	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Strategic Policies	SP7		The Council welcomes working with the OPDC to improve the connections between the OPDC area and the adjoining Kensal Canalside Opportunity Area and the reference included in supporting text paragraph 3.8, bullet 3. However, this should also be reflected in the place policies and Policy SP7 Connecting People and Places, and 3.4 should refer to complementing 'the wider network of town centres and Kensal Canalside Opportunity Area' to fulfil the Duty to Cooperate.
47	679	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Strategic Policies	SP1	para 3.5	In paragraph 3.5 there is a typo, benefits.
47	680	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Strategic Policies	SP1, SP6, places	para 3.8	We welcome the recognition that "Centres in the wider area... will be influenced by the scale of development proposed at Old Oak and Park Royal" (paragraph 3.8, bullet point 6) and that "there is a need for "close collaboration with the surrounding and host local authorities to ... ensure that measures are taken to ... mitigate any potential impacts" (paragraph 3.8, bullet point 6). However, the Local Plan should be drafted to ensure that there are no detrimental impacts rather than looking to just "mitigate any potential impacts" (last bullet point of paragraph 3.8) that might occur. If the function of the new centres is to serve the day to day needs of those living in the area – and not to draw expenditure from elsewhere – then there should not be any detrimental impact. This should be incorporated into Policy SP6: Places and Destinations and appropriate policies in Chapter 4: Places to fulfil the Duty to Cooperate and ensure consistency with national policy.
47	681	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Strategic Policies	SP9	Figure 3.14	With regard to Figure 3.14: Sensitive Locations, this image should include further listed buildings in RBKC including Kensal House and Day Nursery and St Charles Hospital. There should also be reference to Kensal Green Cemetery being a Grade 1 Listed Registered Park and Garden.
50	763	Statutory Consultee	Ben Llewellyn	Environment Agency	Strategic Policies	SP2		Good Growth (page 20). Point b) references the need to deliver low carbon and environmentally resilient development which we support
50	764	Statutory Consultee	Ben Llewellyn	Environment Agency	Strategic Policies	SP8		Green Infrastructure and Open Space (page 26). We welcome the target for 30% of the developable area, outside of Strategic Industrial Locations (SIL) as publically accessible open space, and for 3 new parks in Old Oak. This is supported by OPDC's Local Plan evidence base and is an essential component in achieving OPDC's Spatial Vision. We suggest that the indicative areas of search for the new parks illustrated in Figure 3.11 are further refined and supported in the policies and text for 'Places' in Chapter 4. We also recommend that the requirements of the Water Framework Directive are mentioned when talking about the Blue Ribbon Network.
50	765	Statutory Consultee	Ben Llewellyn	Environment Agency	Strategic Policies	SP9		Built Environment (page 40). There are many references to delivering the 'highest', and to 'high' design quality. We recommend that these are defined using measurable criteria and potentially informed by your Environmental Standards document
50	766	Statutory Consultee	Ben Llewellyn	Environment Agency	Strategic Policies	SP10		We strongly support this policy, particularly in regard to the delivery of Policy EU3: Water. We welcome the aim to secure integrated water management, which is supported through the Integrated Water Management Strategy.
55	831	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Strategic Policies	SP5		SEGRO supports the objective of draft Policy SP5 which seeks the protection, strengthening and intensification of the Strategic Industrial Location (SIL) in Park Royal. Through the Keep London Working report, SEGRO believe that SIL sites should be protected if they do not have wider regeneration benefits. We would however stress that where SIL sites require supporting/ancillary uses for workers etc. more flexibility should be built into the SIL definition. The strategic policy also makes reference to OPDC's proposed approach to the type and affordability of new employment space within the area. SEGRO's comments on these topics are set out below in response to detailed Policies E1, E2 and E3.
56	843	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Strategic Policies	SP1		LBHF supports the transport based regeneration at Old Oak Common and the redevelopment of the wider area.
56	844	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Strategic Policies	Para3.8		LBHF supports the integration with regeneration areas in LBHF.
56	845	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Strategic Policies	SP2		LBHF supports the principle of 'Good Growth', emphasising the need to ensure this policy is met and delivered by applicants and OPDC. Suggested change to the text: Is there a proposed monitoring indicator for this?
56	846	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Strategic Policies	SP3		LBHF supports this policy – it is widely accepted that planning plays an important role in delivering improvements to health and well-being. The implementation of this policy will be directly linked to delivering high quality public realm and open spaces, community facilities and high streets, an inclusive and integrated transport network for all future and existing users high quality housing and the improvement of air quality.
56	847	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Strategic Policies	SP5		LBHF supports the creation of employment opportunities in Old Oak and Park Royal. LBHF is keen to work closely with the OPDC to optimise employment opportunities for local residents in LBHF.
56	848	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Strategic Policies	SP6		LBHF supports this policy and the delivery of places and new clusters. Suggested change to the text: As a strategic policy, the inclusion of 'high quality' to the policy would be welcomed. The supporting text should also include the role of local heritage (buildings, structures and (industrial) landscape features) in placemaking in terms of establishing the long term character of the area.
56	849	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Strategic Policies	SP7		LBHF supports this policy, however, the timely delivery of a range of transport connections is vital and will require working with a number of organisations. This should be reflected in the policy to encourage developers and other public organisations to bring forward relevant infrastructure forward so that it not only coincides with residential development but also in anticipation of future growth in the area. Suggested change to text: The inclusion of 'timely delivery' to a) to read: a) 'Delivers sufficient transport infrastructure required to support the planning growth in the OPDC area in a timely fashion'

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								Is 'sufficient' strong enough? Paragraph 3.55 refers to a 'state of the art transport network'. The policy wording should be ambitious which is integral to ensuring the successful transport based regeneration of the OPDC area, as a local hub and gateway to London.
56	850	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Strategic Policies	Para 3.75		This paragraph deals with the need for transport infrastructure to seamlessly integrate into the development.
56	851	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Strategic Policies	Para 3.73		LBHF is keen to continue to work with OPDC to understand and mitigate the impact of development upon LBHF residents and the local road network.
56	852	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Strategic Policies	Para 3.76		This paragraph should also reflect the sensitive nature of the Grand Union Canal as a nature and conservation site that will be a key feature for the future of this development.
56	853	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Strategic Policies	SP8		LBHF broadly supports this policy and the provision of open space. However, the Council has identified some concerns in relation to EU1
56	854	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Strategic Policies	SP9		At paragraph 3.93 an important point is made: 'Consideration should also be given to the complementarity of materials with that of neighbouring developments.' The policy mostly refers to context and setting which is supported, however, in this area there will also be significant amount of change from new development which may come forward at the same time. Applicants should be aware of other proposals in development that are in proximity. Acknowledgement of this in para 3.93 would be beneficial to the built environment.
56	855	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Strategic Policies	SP10		LBHF supports the timely and integrated delivery of infrastructure.
56	856	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Strategic Policies	Para 3.105		LBHF supports this and will seek to support OPDC to ensure development contributions are sought for specific and wider infrastructure needs.
56	857	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Strategic Policies	Para 3.109		The requirement of Infrastructure Delivery Strategies is supported, as LBHF remains the Local Authority for a large proportion of the area and service provider, LBHF should be involved in these discussions with the OPDC and applicant(s). Suggested change to text: Add reference to LBHF in paragraph.
56	858	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Strategic Policies	Para 3.111		LBHF supports the joint working to manage impacts on amenity and the highway network.
62	990	Local Resident	Douglas Hunt		Strategic Policies	SP8		Current plans are to widen Victoria road and to take 50% of Cerebos Gardens in order to widen the road. As part of these plans the trees currently there will all be cut down. Once the building work is complete, can the remaining 50% of Cerebos Gardens please have trees re-planted and other plants added e.g. low bushes. This will help with air pollution on a busy road, partially block out noise to the residents living in Shaftesbury Gardens and help with privacy. If the road is not widened, can bushes or other plants be added to help with air pollution.
63	997	Education Provider	Michael Ribton	Ark Burlington danes Academy	Strategic Policies	SP3		The retail units on North Pole Road are dominated by outlets offering cheap confectionary, discounted alcohol or discounted multipacks (in the case of supermarkets). It is very depressing. Someone needs to take control of the high street and improve local residents' health
66	1003	Unknown	Raymond Gill		Strategic Policies	SP9		SP9 is positively prepared and legally compliant. (No justification provided)
68	1013	Community Group	Martin Cain	Friary Park Preservation Group	Strategic Policies	SP3		Projections for improving health and reducing health inequalities seem excessively positive and therefore unsound
68	1014	Community Group	Martin Cain	Friary Park Preservation Group	Strategic Policies	SP4		Projections for thriving communities seem excessively positive and therefore unsound
68	1015	Community Group	Martin Cain	Friary Park Preservation Group	Strategic Policies	SP6		Policy is sound (no justification provided)
68	1016	Community Group	Martin Cain	Friary Park Preservation Group	Strategic Policies	SP7		Policy is sound (no justification provided)
68	1017	Community Group	Martin Cain	Friary Park Preservation Group	Strategic Policies	SP8		The lack of detailed monitoring of green infrastructure and open space are vague and therefore unsound.
68	1018	Community Group	Martin Cain	Friary Park Preservation Group	Strategic Policies	SP9		Policy is sound (no justification provided)

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68	1019	Community Group	Martin Cain	Friary Park Preservation Group	Strategic Policies	SP10		Policy is sound (no justification provided)
70	1084	Local Resident	Joanna Betts		Strategic Policies	SP9		In order to 'soften the blow', there is a need for a 'buffer zone' of around 100 meters between the existing communities and new developments that will be higher than existing buildings. We require justification of the unreasonable plot ratios and the 'soft area', which has not been included in Reg. 19 despite our repeated requests throughout the consultation. At all costs, OPDC developments should avoid overshadowing, the intensification of pressure on transport, and should revert to the previous agreement in Reg. 18 on sensitive edges. Ideally, OPDC should provide formal limits to the proximity of new developments around sensitive existing communities and move to a policy of green space around new developments.
70	1109	Local Resident	Joanna Betts		Strategic Policies	SP3	6.47	The Air Quality Study recommends the adoption of a Local Emissions Neighbourhood Policy (p. 67) They note that the OPDC's OAPF aimed to: "Achieve EU established health-based standards and objectives for a number of air pollutants (NOX, PM10 and PM2.5)." (p. 28). The LEN is discussed in Policy SP3 but the wording needs to be strengthened and brought explicitly into the policy box, and not simply discussed in the text. [OPDC should] Replace and place in policy box: The OPDC will work with TfL to implement a LEN across the whole opdc and neighbouring areas. Otherwise new developments simply bring large numbers of people into the most polluted areas.
70	1114	Local Resident	Joanna Betts		Strategic Policies	SP3	3.22	Policy SP 3 (3.22) notes that "People spend 90% of time indoors", suggesting that pollution controls are most relevant to interior living. This was the theme of mitigation at the Mitre Yard Planning Committee. However, this does not account for the sustained use of specific areas by specific, vulnerable groups e.g. children's play spaces on high risk areas of ground floor and roofs need to be assessed for air quality compliance; elderly use of outside spaces; regular walking along polluted routes to schools and neighbourhood facilities by children and families. This is indicated in: [EU4 para 6.55 and 6.57]
72	1126	Education Provider	Catherine Collum	West Twyford Primary School	Strategic Policies	SP3		Policy is sound (no justification provided)
73	1129	Unknown	A. Somefun		Strategic Policies	SP8		Policy is sound (no justification provided)
73	1130	Unknown	A. Somefun		Strategic Policies	SP9		Policy is sound (no justification provided)
74	1137	Unknown	Chloe Fremantle		Strategic Policies	SP4	3.4	Whilst section 3.4 mentions a cultural presence being important, this is probably in the form of a museum or something similar. What about an arts complex providing studios and arts centre to help the proposed community in a more hands on way, and preserve the current studio activity the area benefits from now?
75	1138	Community Group	Henry Lancashire	Brent Cyclists	Strategic Policies	SP7		We support the Sustainable Transport Hierarchy. Focusing on vulnerable road users.
75	1139	Community Group	Henry Lancashire	Brent Cyclists	Strategic Policies	SP7		There is a risk that new routes within the development will adversely affect safety on roads not in the development, for example by increasing motor vehicle movements. This must be mitigated, preferably by making all new routes within the development no-through-route for private motor traffic, and by working with local councils [Duty to Cooperate] to improve surrounding cycling and walking infrastructure..
75	1140	Community Group	Henry Lancashire	Brent Cyclists	Strategic Policies	SP7		The "Healthy Streets" principles must be delivered on all new streets and on most existing streets within the development area, the area must be designed such that this is "feasible" everywhere.
75	1141	Community Group	Henry Lancashire	Brent Cyclists	Strategic Policies	SP7		We support the statement that the "High Street" will have "an accessible and inclusive environment, consistent street widths and a detailed design approach that contributes to a unique sense of place, that prioritises walking, cycling and where feasible, bus routes and servicing." However, we are concerned that this will encourage the narrowest street width allowable within guidelines, infrastructure (in particular for cycling and walking given the area topography), must be build to the highest available standards.
75	1142	Community Group	Henry Lancashire	Brent Cyclists	Strategic Policies	SP7		We support the awareness of wind turbulence as a danger to vulnerable road users in built up areas. Mitigation must be put in place if wind turbulence occurs.
75	1143	Community Group	Henry Lancashire	Brent Cyclists	Strategic Policies	SP7		We support the aim to "[prevent] through routes for private vehicles."
75	1144	Community Group	Henry Lancashire	Brent Cyclists	Strategic Policies	SP7		The aim that "Each route will have a specific character and function" must not be at the expense of walking and cycling safety and attractiveness.
75	1145	Community Group	Henry Lancashire	Brent Cyclists	Strategic Policies	SP7		"Water-borne movement, including freight" on the canal must not come at the expense of pedestrian and cycle movements along the canal.
77	1177	Local Resident	Sarah Abrahart		Strategic Policies	SP6		Policy is unsound (no justification provided)
77	1178	Local Resident	Sarah Abrahart		Strategic Policies	SP8		Exclude wormwood scrubs from the OPDC. Provide further open natural green space as that indicated in the plan falls far short of adequate or acceptable. Wormwood Scrubs must not be used as the mandatory green space.
77	1179	Local Resident	Sarah Abrahart		Strategic Policies	SP9		Policy is unsound (no justification provided)
79	1199	Local Resident	David Craine		Strategic Policies	SP7		This is important to mitigate the risk of serious traffic congestion.
79	1200	Local Resident	David Craine		Strategic Policies	SP9		I would especially stress the importance of being sensitive to neighbouring residential areas.

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81	1217	Community Group	Chloe Fremantle	ArtWest	Strategic policies	SP1	3.8	We feel its absolutely key that the OPDC ensures landowners and local authorities work to achieve the successful integration of communities across the OPDC area.
81	1218	Community Group	Chloe Fremantle	ArtWest	Strategic policies	SP2	3.14	we support these intentions of the OPDC, and believe they are key to the success and future safety of the area and its buildings
81	1219	Community Group	Chloe Fremantle	ArtWest	Strategic policies	SP5	3.28, 3.30, 3.36	ArtWest could be a key part of this creative sector. Consideration of them and inclusion of workspaces for their needs within the future OPDC is key to our being able to offer continuing provision of a welcoming artistic hub with which local communities can interact. Provision of affordable workspaces is a priority.
81	1220	Community Group	Chloe Fremantle	ArtWest	Strategic policies	SP6	3.45, 3.46	Artists' workspaces could be part of the cultural provision, bringing people into the area.
81	1224	Community Group	Chloe Fremantle	ArtWest	Strategic policies	SP9	3.96	We certainly support and hope that 3.96 is followed closely.
81	1225	Community Group	Chloe Fremantle	ArtWest	Strategic policies	SP6		ArtWest would certainly wish to be consulted and included regarding the proposed cultural quarter, feeling that artists' workspaces could be great assets to this proposed lively community
82	1246	Neighbourhood Forum	Henry Peterson	St Quintin and Woodlands Neighbourhood Forum	Strategic policies	SP2		We support the detailed case made by the Interim Forum, and their view that the current Regulation 19 Draft Plan is not based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. We do not consider draft Strategic Policies SP2 on Good Growth to be positively prepared or justified in respect of the housing element of these policies.
82	1247	Neighbourhood Forum	Henry Peterson	St Quintin and Woodlands Neighbourhood Forum	Strategic policies	SP4		We support the detailed case made by the Interim Forum, and their view that the current Regulation 19 Draft Plan is not based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. We do not consider draft SP4 on Thriving Communities to be positively prepared or justified in respect of the housing element of these policies.
82	1249	Neighbourhood Forum	Henry Peterson	St Quintin and Woodlands Neighbourhood Forum	Strategic policies	SP2		We do not consider draft Strategic Policies SP2 to be the most appropriate strategy when considered against reasonable alternatives. We do not consider that alternative strategies for the future of the Old Oak part of the OPDC area have been adequately identified or consulted or that these policies are justified. There could be an alternative vision and set of outcomes for Old Oak which we believe would be significantly more successful and sustainable.
82	1250	Neighbourhood Forum	Henry Peterson	St Quintin and Woodlands Neighbourhood Forum	Strategic policies	SP4		We do not consider draft Strategic Policies SP4 to be the most appropriate strategy when considered against reasonable alternatives. We do not consider that alternative strategies for the future of the Old Oak part of the OPDC area have been adequately identified or consulted or that these policies are justified. There could be an alternative vision and set of outcomes for Old Oak which we believe would be significantly more successful and sustainable.
82	1255	Neighbourhood Forum	Henry Peterson	St Quintin and Woodlands Neighbourhood Forum	Strategic policies	SP9		Nor does the document include policies on housing density, nor a density map of the kind included in the Regulation 18 Local Plan
84	1293	Local Resident	Nicholas Kasic		Strategic policies	SP9		In order to 'soften the blow', there is a need for a 'buffer zone' of around 100 meters between the existing communities and new developments that will be higher than existing buildings. We require justification of the unreasonable plot ratios and the 'soft area', which has not been included in Reg. 19 despite our repeated requests throughout the consultation. At all costs, OPDC developments should avoid overshadowing, the intensification of pressure on transport, and should revert to the previous agreement in Reg. 18 on sensitive edges. Ideally, OPDC should provide formal limits to the proximity of new developments around sensitive existing communities and move to a policy of green space around new developments.
85	1344	Local Resident	Francis, Marc and Caroline Sauzier		Strategic Policies	SP3	6.47	The Air Quality Study recommends the adoption of a Local Emissions Neighbourhood Policy (p. 67) They note that the OPDC's OAPF aimed to: "Achieve EU established health-based standards and objectives for a number of air pollutants (NOX, PM10 and PM2.5)." (p. 28). The LEN is discussed in Policy SP3 but the wording needs to be strengthened and brought explicitly into the policy box, and not simply discussed in the text. [OPDC should] Replace and place in policy box: The OPDc will work with TfL to implement a LEN across the whole opdc and neighbouring areas. Otherwise new developments simply bring large numbers of people into the most polluted areas.
85	1349	Local Resident	Francis, Marc and Caroline Sauzier		Strategic Policies	SP3	3.22	Policy SP 3 (3.22) notes that "People spend 90% of time indoors", suggesting that pollution controls are most relevant to interior living. This was the theme of mitigation at the Mitre Yard Planning Committee. However, this does not account for the sustained use of specific areas by specific, vulnerable groups e.g. children's play spaces on high risk areas of ground floor and roofs need to be assessed for air quality compliance; elderly use of outside spaces; regular walking along polluted routes to schools and neighbourhood facilities by children and families. This is indicated in: [EU4 para 6.55 and 6.57]
88	1418	Local Resident	Lily Gray		Strategic Policies	SP3	6.47	The Air Quality Study recommends the adoption of a Local Emissions Neighbourhood Policy (p. 67) They note that the OPDC's OAPF aimed to: "Achieve EU established health-based standards and objectives for a number of air pollutants (NOX, PM10 and PM2.5)." (p. 28). The LEN is discussed in Policy SP3 but the wording needs to be strengthened and brought explicitly into the policy box, and not simply discussed in the text. [OPDC should] Replace and place in policy box: The OPDc will work with TfL to implement a LEN across the whole opdc and neighbouring areas. Otherwise new developments simply bring large numbers of people into the most polluted areas.
88	1423	Local Resident	Lily Gray		Strategic Policies		3.22	Policy SP 3 (3.22) notes that "People spend 90% of time indoors", suggesting that pollution controls are most relevant to interior living. This was the theme of mitigation at the Mitre Yard Planning Committee. However, this does not account for the sustained use of specific areas by specific, vulnerable groups e.g. children's play spaces on high risk areas of ground floor and roofs need to be assessed for air quality

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								compliance; elderly use of outside spaces; regular walking along polluted routes to schools and neighbourhood facilities by children and families. This is indicated in: [EU4 para 6.55 and 6.57]
89	1432	Local Resident	Nicky Guymer		Strategic Policies	SP5		We think Strategic Policy SP5 - protecting Strategic Industrial Land (SIL) at Park Royal (because it is important to London's economy) - is restrictive; it limits the scope for mixed use development within SIL areas on the Old Oak side of the development zone. As a result, there's more likely to be a continuation of harmful industrial development on the SIL land that surrounds the railway cottages and Midland Terrace. The OPDC's use of such hard 'zoning' policies is inflexible. There should be a mixed-use and a buffer area around the Railway cottages.
91	1464	Local Resident	Bruce Stevenson		Strategic Policies	SP5		We think Strategic Policy SP5 - protecting Strategic Industrial Land (SIL) at Park Royal (because it is important to London's economy) - is restrictive; it limits the scope for mixed use development within SIL areas on the Old Oak side of the development zone. As a result, there's more likely to be a continuation of harmful industrial development on the SIL land that surrounds the railway cottages and Midland Terrace. The OPDC's use of such hard 'zoning' policies is inflexible. There should be a mixed-use and a buffer area around the Railway cottages.
92	1483	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP7		The Hammersmith Society still believe the following are key objectives for the development of the OPDC area : The importance of developing walkable neighbourhoods and a sustainable movement network within the Opportunity Area and connecting neighbouring communities
92	1487	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP2	3.16	The future cannot be predicted so the plan must have flexibility to adapt and change.
92	1497	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP1		We support the principle that the Development Area should have national as well as local ambitions. However we have concerns at the realisation of some of these, while at the same time we feel that in many ways (Eg. Culture and Vision) the Plan is not ambitious enough.
92	1502	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP7		Rail Links generally : We accept that taken as a whole with all the proposals for the rail network, the OPDC area will potentially be one of the best served areas in the country. But while the area will be easy to get to and from, there is no co-ordinated plan for rail or bus connections within the area itself. Para. 3.7 concerning the opportunity for improved interconnectivity are worthy ambitions, but no detail is given as to how these issues might be resolved. Again in our view this means the Plan is not Effective or Sound.
92	1503	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP2		In our view there is a mismatch between the requirements for quality and quantity as defined in this policy. Again the ambitions for good and sustainable design are laudable, but cannot be reconciled with the high density requirements of the Plan.
92	1504	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP9		The Old Oak figures for housing provision (see SP4 below) equate to an average density across all 54ha as 445 units per hectare. This far exceeds the London Plan top end figure of 405 units per ha (London Plan Table 3.2) for a Central area with PTAL of 4 - 6. Bearing in mind that it is intended that there should be a mix of house types and densities and that not all areas within the OPDC area will be appropriate as 'Central' especially around the edges, the implications are that large parts of the development will have to be built at a density of between 550 and 600 units per hectare (which the London Plan only allows in exceptional circumstances). To achieve such extreme housing density there are all sorts of implications most notably excessive height (40 storeys or more) and a large proportion of small units, which will be prejudicial to the provision of family homes, lack of amenity space and potential unforeseen social problems. We note from the recently published SIL study that there are considerable disadvantages due to the excessive costs of building high.
92	1506	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP2		This section also places great emphasis on the potential benefits of technology in achieving the ambitions of the Plan, but in our view, although this might improve the speed of delivery, it is unlikely to produce better quality.
92	1507	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP3		The ambitions as set out are laudable.
92	1508	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP4		while we support the ambition of 'Thriving Communities', we find this is at odds with the physical requirements being imposed. Housing targets: We have consistently questioned the target of 25,500 homes for the OPDC area as a whole (24,000 in Old Oak : 1500 in Park Royal). These figures as set out in para .1.27 of the Introduction and para. 3.11 of OSP2: Land Use in the original Draft Plan, and repeated in the latest Plan at 3.3 and Housing H1, seem to be based upon a political objective rather than sound practice or analysis. In our view, neither these nor the allocations by Place are not evidence based. The figures, which have been promoted for some time, and formed the basis of the OAPF, came before the establishment of the OPDC and any thorough analysis of the site or consideration of how a plan for the area might evolve. Now that this Plan has been further developed - and one that we can largely support in its general ambitions - there needs to be a reappraisal of what the plan can reasonably provide in terms of housing that is commensurate with all the proposals set out in the plan in terms of employment, transport (particularly roads), social infrastructure and green spaces. The current targets for housing densities and the justification set out in paras. 3.27 – 3.33 of OSP4 have huge implications for heights, which are not reflected in any of the illustrative material so far presented.
92	1509	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP4		As we understand it, the overall target figures are based upon total available land for housing development of 57 hectares – made up of 54 ha in Old Oak and 3 ha in Park Royal. The quantum of these site areas may be overly ambitious, particularly in Old Oak, as they assume the rafting over of several areas, which are proving to be just too difficult and expensive.
92	1511	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP4		We understand the requirement to optimise development, but we strongly demand that the targets are reassessed and reduced downwards to densities within the Central classification. We would point out for example that a density of 350 units per ha would still provide for approximately 20,000 units.

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92	1513	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP4		Unless the housing targets are reduced to levels that are within the London Plan, we will request that the Inspector, appointed to examine the Plan, finds it neither 'Sound' nor 'Consistent' as it is not in conformity with the London Plan standards.
92	1518	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP9		The Plan should make explicit the sort of building heights that are called for the densities being discussed. The emerging picture during the consultation is that heights of 40-50 storeys will be required to support the proposed densities. The Plan is not clear about heights at SP4, SP9, H1 and D5 and therefore those policies are not justified.
92	1519	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP4		As part of part of our original submission, we had agreed with the GUA that OPDC needed to undertake the following urgent action and in our view this is outstanding in order for the Plan to be positively prepared and effective: Carry out a detailed analysis of actual land available for housing supply once all the other requirements for land have been taken into account (for transport, employment, town centre and social infrastructure uses, utilities and open space).
92	1520	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP9		As part of part of our original submission, we had agreed with the GUA that OPDC needed to undertake the following urgent action and in our view this is outstanding in order for the Plan to be positively prepared and effective: Make an exact assessment of the appropriate building heights and densities.
92	1522	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP4		As part of part of our original submission, we had agreed with the GUA that OPDC needed to undertake the following urgent action and in our view this is outstanding in order for the Plan to be positively prepared and effective: Adjust the number of homes that can realistically be provided.
92	1523	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP5		We support the ambitions of the Plan to create additional employment although as with the housing target we question whether the quantum is realistic.
92	1525	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP5		We support all the initiatives for training and working with educational institutions.
92	1527	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP6		We support the ideas and principles set out in this section. We have consistently argued that there should be a major cultural element in the Plan and agree that probably this is best provided in Old Oak North. Our concern is that to date such plans have not been bold enough.
92	1528	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP7		We support the principles set out in this section, particularly the creation of Old Oak High Street
92	1529	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP7		Our concern, voiced more specifically under Section 7. Transport, is that while the area will be well connected to and from outside, there is not a proposal to provide a transport link between each of the 'Places'. This will be particularly important to interconnect key residential areas with the major elements of Social Infrastructure, if in the case of medical and educational facilities, these are to be centralised. A unified transport system covering each of main streets shown on Figure 3.8 – Proposed Connections, would be a good starting point. While encouraging walking is to be welcomed, the distances across the site are considerable, and impractical especially for the infirm, less able bodied and parents with push chairs and the like.
92	1530	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP7		Figure 3.8 – and others like it in the Plan – do not appear to recognize that the overall site is not flat.
92	1531	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP8		We very much welcome this strategic Policy and the relevant parts of the Environmental Standards Study. The proposed green infrastructure and open spaces is vital in the provision of a humane development. We believe that the OPDC is striking the right balance between large and small parks, biodiversity and private open spaces. The target of 30% must be adhered to and controlled. Too often we have seen similar plans gradually diluted. (For example, in the White City Opportunity Area where plans for a major park in the original Masterplan have been lost)
92	1532	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP8		We welcome the proposal to develop 3 local parks of minimum 2 hectares. The provision of these must be driven by OPDC and not left to developers, and there must be clear plans for the long term maintenance responsibilities and funding. The parks must be truly public and accessible, and consideration should be given to putting them into Fields in Trust to ensure their long term protection. To be effective and justified the Plan should be clear as to the ownership, funding and management of these parks.
92	1533	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP8		We have read and fully support the submission 'Response by the Friends of Wormwood Scrubs'. None of these parks including Wormwood Scrubs must be seen by developers as the means of avoiding their normal provision of open space within their developments.
92	1534	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP8		Obviously the canal forms an important element in the overall green space provision and we have set out our comments within the 'Places' section.
92	1536	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP8		Railway embankments should also be regarded as providing beneficial open space : They may have a role in providing for allotments.
92	1537	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP8		Role that can be played by the adjacent cemeteries : Both the North Acton Cemetery and the St. Mary's Cemetery lie adjacent to the ODPC area and should not be regarded by developers as meeting the Open Space required.
92	1538	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP9		Again, we support the principles set out in this section. However, as indicated in the supporting text, much of the judgment on quality can be subjective. To date, we have not been impressed that any of the schemes for which planning approval has been granted (as noted above) is either innovative or of exceptionally high standard of design.
92	1539	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP9		We are concerned at the reference to high density and tall buildings (Paras. 3.94 and 3.95). We agree that the OPDC area is suitable for some such development provided that the heights are modest (below 20 storeys and at a density of below 350 units/ha) but we have seen no such definitions within the plan. We

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								have already set out we consider development in excess of these limits is unacceptable in the context of the Plan ambitions as a whole.
92	1540	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP9		There seems to have been some watering down in the Revised Plan. The Policy supports development “which responds appropriately to the setting of sensitive locations” identified in fig 3.14. The previous Reg 18 Preferred Policy Option OSP4 said: The OPDC will support policy options that deliver predominantly i) the highest density around Old Oak Common Station ii) higher density development around other rail stations responding to the surrounding context iii) medium densities at residential-led areas, and iv) lower densities at sensitive edges. And the supporting text 3.27 said: Suggested density levels that may be appropriate in different locations ...are: • Highest: Old Oak Common Station and surrounds: in the region of 600 units per hectare; • High: Stations and key destinations in the region of 550 per hectare; • Medium- residential led areas: in the region of 405 units per hectare; and • Lower- sensitive edges: in the region of 300 units per hectare The new text is weak and vague: 3.96 merely says “Development will be expected to respond appropriately” to heritage assets, open space and existing residential communities. We have seen nothing in the supporting evidence to justify the change and do not consider the new text to be Justified. The former text offers more specific safeguards in terms of excessive height and density. The previous draft Reg 18 text in fig 18 “Densities and Building Heights” gave colourcoded guidance of lower to highest density over the area. This has disappeared to be replaced by fig 3.14 “Sensitive Locations”. In our view, the failure of the policy to be transparent about building heights means it is not justified. We consider that the former text to identify specific density levels offered some protection from excessive over development. We request that the earlier text is reinstated. E.g. it included a “lower density” lightest blue rim at the north of Wormwood Scrubs - now Wormwood Scrubs has nothing special apart from appearing on fig 3.14 “Sensitive Locations”
92	1541	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP9		We welcome the approach to Heritage Assets as set out in para. 3.96, and the other parts of the Plan referred to. The declaration of Cumberland Park as a Conservation Area is also welcomed.
92	1542	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP9		We request that OPDC compile a list of unregistered Assets for the whole of the area.
92	1543	Community Group	Tom Ryland	Hammersmith Society	Strategic policies	SP10		There is no doubt the co-ordination, integration and phasing of development as a whole is very complex, and the restraints are well captured in this section. Existing local residents are obviously concerned at the implications of multi-development and the potential disruption going on around them. It will be most important that developers make strenuous efforts to safeguard the amenities currently enjoyed by residents. It will be equally important that as the site is developed in phases, that each completed phase will be integral and protected as far as possible from the work ongoing on the next phases.
92	1635	Community Group	Tom Ryland	Hammersmith Society	Strategic Policies	SP7		The OPDC area will be potentially one of the best connected sites in Britain if you want to get in or out but there is currently no provision or apparently ambition to provide an internal transportation system within the area, connecting up each of the main places/neighbourhoods, commercial/shopping centres and transport stations. This could be at its most basic be a simple single storey bus system – but as we are talking about an exemplar new quarter for London then something more ambitious such as a driverless system should be considered – and considered urgently before the design of sites such as Car Giant/Oak Park at Old Oak North have become fixed. Without a policy for a transport system within the site, we do not regard the Transport policies as being positively prepared. The important qualities should be that it serves the whole community, should be accessible to all potential users, frequent and preferably free of charge.
92	1648	Community Group	Tom Ryland	Hammersmith Society	Strategic Policies	SP9		Despite repeated questioning at Consultation and Q&A sessions, OPDC staff could not give any information about the heights needed to supply the quantum of development specified in the Reg 19 draft. This is a material omission, without which the Plan cannot be seen as giving an adequate framework for development. This is the Housing chapter and it is must give a realistic idea of what people’s living environment will be.
92	1663	Community Group	Tom Ryland	Hammersmith Society	Strategic Policies	SP2		All units should be designed as part of mixed tenure neighbourhoods to avoid isolation. Provide where possible for good outlooks, avoid overshadowing and single aspect dwellings especially where north facing.
92	1673	Community Group	Tom Ryland	Hammersmith Society	Strategic Policies	SP5		We question the reality of the target of 65,000 new jobs within the OPDC area made up of 55,000 within Old Oak and 10,000 in Park Royal. There does not seem to be a sound basis for this claim.
92	1684	Community Group	Tom Ryland	Hammersmith Society	Strategic Policies	SP6		It is important that these centres establish their own unique identities and that they do not try and emulate the Metropolitan Centre that is ‘Westfield’ nor detract from adjoining centres such as Harlesden. It is important that each centre is appropriate to its function.
93	1767	Residents Association		Wells House Road Residents Association	Strategic Policies	SP3	6.47	The Air Quality Study recommends the adoption of a Local Emissions Neighbourhood Policy (p. 67) They note that the OPDC’s OAPF aimed to: “Achieve EU established health-based standards and objectives for a number of air pollutants (NOX, PM10 and PM2.5).” (p. 28). The LEN is discussed in Policy SP3 but the wording needs to be strengthened and brought explicitly into the policy box, and not simply discussed in the text.

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								[OPDC should] Replace and place in policy box: The OPDc will work with TfL to implement a LEN across the whole opdc and neighbouring areas. Otherwise new developments simply bring large numbers of people into the most polluted areas.
93	1772	Residents Association		Wells House Road Residents Association	Strategic Policies	SP3	3.22	Policy SP 3 (3.22) notes that "People spend 90% of time indoors", suggesting that pollution controls are most relevant to interior living. This was the theme of mitigation at the Mitre Yard Planning Committee. However, this does not account for the sustained use of specific areas by specific, vulnerable groups e.g. children's play spaces on high risk areas of ground floor and roofs need to be assessed for air quality compliance; elderly use of outside spaces; regular walking along polluted routes to schools and neighbourhood facilities by children and families. This is indicated in: [EU4 para 6.55 and 6.57]
94	1780	Local Resident	Oonagh Heron		Strategic Policies	SP5		Strategic industrial land: A mixed-use zone with a buffer area around e.g. my railway cottages would be much more flexible and prevent continuation of solely harmful industrial development so close to a residential area.
95	1788	Local Resident	Mark Walker		Strategic Policies	SP5		I object to Strategic Policy SP5 - protecting Strategic Industrial Land (SIL) at Park Royal since it limits scope for mixed use development within SIL on Old Oak side; so there's likely to be more harmful industrial development on the SIL surrounds our railway cottages and Midland Terrace. There should be a mixed-use and preferably and a buffer area around all the residential enclaves – Policy P2 seems to suggest a buffer or mitigation around the railway cottages because of Powerday at Old Oak Sidings, but that needs to be on a bigger scale.
96	1805	Local Resident	John Cox		Strategic Policies	SP7		This is not positively prepared, because it does not adequately promote modal shift from car use to public transport, by actively marketing the latter to replace the former. I suggest adding to SP7 (or somewhere else, and no doubt shortened from this supporting text wording): "The OPDC will not rely on merely the provision of bus//Underground/Overground train times being available through Countdown screens and mobile phones for those who 'want' them. By means of demonstrator systems financed by the OPDC, it should help to create a competitive industry of display screens in all public buildings and larger residential blocks, financed by advertising, that draw together all relevant data feeds of public transport of the surrounding area. The aim is to have a provable modal shift from private car use, since drivers are seeing public transport marketed directly at them. The OPDC will help to facilitate TfL and Network Rail logo use on systems that meet technical standards such as update reliability, advertising being restricted to parts of the screen, readability, and other standards thought necessary."
100	1870	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic Policies	SP4		In our view, the fundamental flaw in the OPDC Draft Local Plan, on which we commented in our Regulation 18 submission, is the lack of any solid justification for an 'objectively-assessed need' for 24,000 new homes at Old Oak. Options for a lower housing target and lower intensity of development have not been explored, or offered for consultation, at any stage in the Plan's preparation
100	1871	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic Policies	SP2	SP4	Our understanding of the requirement for 'soundness' (Planning Advisory Service) is that 'The DPD should provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal' We do not consider the current Regulation 19 Draft Plan to be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. Specifically, we do not consider draft Strategic Policies SP2 on Good Growth and SP4 on Thriving Communities to be 'positively prepared' in respect of the housing element of these policies
100	1872	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic Policies	SP2	SP4	We do not consider draft Strategic Policies SP2 and SP4 to be the most appropriate strategy when considered against reasonable alternatives. We do not consider that alternative strategies for the future of the Old Oak part of the OPDC area have been adequately identified or consulted or that these policies are justified. For the Regulation 18 Plan policies OSP1 on Optimising Growth, the document stated 3.7 that No reasonable alternative policy options have been identified as an alternative would not be consistent with the NPPF or in general conformity with the London Plan. We find this view hard to accept. The London Plan policy and housing target for Old Oak appears in an annexe to the Further Alterations. LB Hammersmith & Fulham clearly believed in 2015 that an alternative option, with a lower target, could be put forward in its own Draft Local Plan
100	1875	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic Policies	SP9		We have concerns that the Regulation 19 Draft OPDC Plan is significantly less transparent and accessible to the public than the Regulation 18 version, in terms of its content on housing density and tall buildings. As such we consider that it fails to conform with NPPF and National Planning Practice Guidance
100	1877	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic Policies	SP5		We view Strategic Policy SP5 on Economic Resilience to be over-restrictive in its protection of SIL and out of step with the NPPF guidance
100	1892	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP9		A major concern of the public over the Regulation 19 Draft is its lack of transparency on the key issues of housing density and building heights. National Planning Policy Guidance includes the following requirements in respect of Local Plans (Paragraph: 010 Reference ID: 12-010-20140306) While the content of Local Plans will vary depending on the nature of the area and issues to be addressed, all Local Plans should be as focused, concise and accessible as possible. In line with the National Planning Policy Framework, the Local Plan should be clear in setting out the strategic priorities for the area and the policies that address them. We do not consider the Regulation 19 OPDC Local Plan to be at all clear, nor accessible in terms of the implications of its policies on housing densities and building heights. Even a reader well versed in planning documents would struggle to find clarity or transparency. The Regulation 18 version was significantly more honest and up-front on these issues. The Regulation 18 version included a draft policy OPS1 on 'Optimising Growth. Draft policy OSP2 on Land Use reconfirmed the 24,000 homes target from the Further Alterations to the London Plan. Draft Policy OSP4 introduced the concept of 'the highest density development' around Old Oak Station with density levels diminishing to 'lowest densities at sensitive edges'. Definitions of 'highest' density (in the region of 600 units per hectare) on a scale down to 'lower' density (in the region of 300 units per hectare) were provided in the text of the Plan as part of Draft Policy OSP4. While the relationship between these figures and the London Plan Density Matrix (and the fact that these levels significantly exceed current London Plan guidance) was not

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								explained, the lay reader of the document was at least given some idea that density levels being proposed for Old Oak were at a very high level of 'intensification', exceeding even the high norms in London's Central Activities Zone. A map showing the different areas of 'highest density' and 'sensitive edges' was also provided at page 43 of the Regulation 18 Draft Plan. This was something the public could understand. No similar map appears in the Regulation 19 Plan. By contrast, the Regulation 19 Draft Plan contains frequent references to 'high density' in the sections on strategic policies and in the sections on the series of 'Places' identified in the Plan. But the reader has search as far as the Glossary on page 290 to find the sole explanation of what 'high' or 'lower' density means in the context of the Plan. Even here, the figures are prefaced with a disingenuous statement saying this information is provided to interpret the London Plan sustainable residential quality density matrix for the Old Oak and Park Royal local context. This does not explain that the OPDC 'local context' uses a very different (and higher) set of density definitions to the London Plan Policy 3.4 and accompanying Density Matrix.
100	1893	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP2		In the Regulation 19 version, Draft Policy SP2 on 'Good Growth' asserts at paragraph 3.10: OPDC can fulfil a vital role in helping to meet London's growth sustainably. It is imperative that given the scale of development envisaged, it achieves high standards of sustainability in terms of design, delivery, operation and management. This can be particularly challenging at high densities, but it is through high density, transit orientated development that the greatest sustainability benefits can be realised. We ask what evidence lies behind the simplistic assertion that 'through high density, transit oriented development the greatest sustainability benefits can be realised'. While the present London Plan reflects a policy of building at higher densities near public transport nodes, the concept that Londoners either wish or need to live in extreme 'super-densities' in tall buildings around railway stations has not gone unchallenged in recent years.
100	1894	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP9		In the same vein, there are frequent references throughout the Regulation 19 version, and within the draft policies, to a variety of building heights, a range of building heights, and to taller or tall buildings. These 'ranges' are not specified in Policies SP2 or SP4, nor in Policy SP9 on the Built Environment.
100	1896	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP9		Occasionally a range is specified within the detailed policies included in each 'Place' chapter. This is in instances where lower ranges are proposed (e.g. Policy P1l(iii) for Old Oak South which refers to delivering heights of generally 6-8 storeys fronting directly onto the Grand Union Canal with opportunities for taller buildings at key crossing points such as Old Oak High Street, Park Road and Union Street.
100	1897	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP9		The lay audience for the Local Plan therefore has no way of telling whether the Plan's policies on housing density and building height will lead to buildings of 20 storeys, 40 storeys or 60 storeys. When questioned on this at public consultation sessions, OPDC officers have declined to give answers and have repeated that each application will be treated on its merits.
100	1898	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP9		The first draft of the Development Capacity Study identified height ranges for different parts of the OPDC area (while referring only to a range 'above 20 storeys'. The revised DCS (Supporting Statement No.12) does not cover the subject of building heights. Analysis of appropriate densities appears to be based solely on a set of six 'precedent' developments in London ranging 691 to 345 dwellings per hectare. This information is coupled with data on densities of schemes already permitted by OPDC at Oaklands and in Scrubs Lane. The resultant conclusion at paragraph 3.11 of the DCS study is that: In light of the above information, an indicative density range for housing of 300 to 600 units per hectare has been defined that responds to the location of sensitive locations, existing and future public transport services / access and other destinations. We find it hard to understand firstly how this critical element of the Local Plan is neither explained nor enshrined in a policy on housing density within the Plan. Nor why this information has been tucked away in one of 53 Supporting Statements.
100	1900	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP1		Policy SP1iii could usefully reflect the comment in the text that the proposed rail interchange at Old Oak will be implanted into some of the most deprived electoral wards and Census Output Areas in the country. This poses particular challenges in balancing the needs of existing residents against those of new arrivals, for which developments are already coming forward with minimal genuine affordable housing.
100	1901	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP2		Policy SP2 includes sub-clauses which are inherently in tension, if not contradictory (appropriately high densities/vibrant mixed and inclusive lifetime neighbourhoods/high standards of placemaking/feasible solutions for the ongoing management of buildings). Clusters of tall residential towers built at what have become termed as 'super-density' and 'hyper-density' ⁴ have not proved to date to achieve all the above outcomes.
100	1902	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP3		A strategic policy of improving health and reducing health inequalities (Policy SP3) will be supported by all, but there is little evidence of how this is to be achieved through other strategic and more detailed policies. A major study of 4.4 million people in Sweden has shown that a high level of urbanisation is associated with increased risk of psychosis and depression for both women and men ⁵ . It seems clear that mothers with young children are the most disadvantaged group, with increased likelihood of developing psychoneurotic illnesses. Children become socially independent later than those living at lower levels ⁶ . The difficulties of building at high densities in high pollution areas is also a factor. This policy is as yet inadequately justified.
100	1903	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP4		Policy SP4 promotes lifetime neighbourhoods, social cohesion and the integration of new and existing communities. Again, this is a wholly commendable objective, but policy SP4ii (which reads delivering at least 22,350 additional homes between 2018-38...) is of no direct relevance to the achievement of this objective and in our view should be deleted as a sub-clause.
100	1904	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP5		Draft Policy SP5 places great emphasis on the protection of Strategic Industrial Land (SIL) at Park Royal. The policy justification states Protecting the SIL in Park Royal is vital to the London economy and opportunities should be taken to intensify its use where feasible. While accepting the need to protect 'industrial land' in London, we argued in our response to the Regulation 18 OPDC Local Plan that the current London Plan Policy 2.1.7 on Strategic Industrial Locations (of which Park Royal is one) is over-restrictive in terms of the potential for mixed use development within designated SIL areas. As recognised by the report Growing London the world of work is changing rapidly and the conventional distinctions between 'work space' and 'residential space' are disappearing. As Growing London recognises: Advances in technology are continuing to change the nature of industry in London and our patterns of work. These changes are challenging traditional assumptions about 'dirty' industrial uses being a 'bad neighbour', or needing certain types of accommodation, like single-storey sheds or large yards. There is potential here for new, innovative

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								typologies to emerge that test higher densities, sharing facilities, or different mixes of use'. Our forum members see rigid policies which apply standard 'zoning' policies restricting permitted uses across large areas as too blunt an instrument of spatial planning, and as inappropriate for a 2016-2036 timeframe. We consider Policy SP5a) to be not justified.
100	1905	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP5		Sub paragraph d) of Policy SP5 has the aim of supporting the provision of small workspaces across both Old Oak and Park Royal. Sub paragraph f) is about designing proposals to ensure they are flexible and adaptable to changing needs. We see these aims being hampered over a 2018-38 timeframe by sub paragraph a) which reads protecting, strengthening and intensifying the Strategic Industrial Location (SIL) in Park Royal.
100	1906	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP5		If mixed use, introducing an element of residential use into appropriate parts of Park Royal, can be achieved without loss of employment floorspace, why should this be resisted? As we read the current NPPF, Government policy is moving away from inflexible zoning and over-restrictive policies which can lead to vacant and underused floorspace. 8.11 The NPPF includes the following guidance: • promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas (NPPF page 6) • To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century (paragraph 20) • facilitate flexible working practices such as the integration of residential and commercial uses within the same unit (paragraph 21) • Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Overall, we consider Policy SP5 in its present form to be not justified.
100	1908	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP6		This is a generic policy on placemaking at the more detailed level, and presages the Place chapters in the Local Plan. We question the concept of 'clusters' which the text states are characterised as locations which are likely to attract higher footfall and/or have a particular use and as such warrant more detailed policy. These places and clusters celebrate their respective distinctiveness in terms of current context and future development approaches.
100	1909	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP6		What does the term 'celebrate' mean in spatial planning terms? The reality of the introduction of 'clusters' within the Regulation 19 Local Plan (this concept did not feature in the Regulation 18 Local Plan) is that in relation to Scrubs Lane these locations been deemed appropriate for one tall building each (see comments below on Place P10 Scrubs Lane). The outcome, in terms of permissions granted, has compromised the 'vision' of Scrubs Lane set out in the Regulation 18 Local Plan. We consider Policy SP6a)ii) to be not justified
100	1910	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP7		This lengthy strategic policy addresses transport issues and the street network in the OPDC area. It is at a level of detail which makes it questionable whether it should be categorised as a 'strategic policy'.
100	1911	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP7		We support the more strategic content of the policy with the following exceptions • We support a policy SP7b(i) of minimising the need to travel, but question how Local Plan policies resisting any mixed use on Strategic Industrial Land are compatible with this? In an area of existing traffic congestions, let alone massive new development, an increasing number of Londoners will wish to arrange their lives to minimise the need from a journey to and from work. Resisting mixed use development through traditional and inflexible zoning policies flies in the face of this trend.
100	1912	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP7		We support the more strategic content of the policy with the following exceptions: We support the proposed new key streets of Old Oak High Street, Park Road and Grand Union Street, but it must be recognised that the passage along these routes will be far from straightforward in some instances. An elevated bridge over Old Oak Common Lane would not be a satisfactory solution.
100	1913	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP7		Similarly, connectivity between the five stations (see Policy SP7g(ii)) will may prove to be 'seamless' (in the sense having of no physical obstructions) but walking distances between the stations are excessive compared with most transport interchanges.
100	1914	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP7		We are not clear on the proposed role of 'Wormwood Scrubs Street' shown as an east/west route across the northern boundary of Wormwood Scrubs. Is this to be open to all traffic, or with limitations? If the former, the tranquillity and value of this Metropolitan Open Land will be lost forever.
100	1915	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP8		We welcome Policy SP8 (iii) requiring the delivery of 30% of the developable area outside SIL as publicly accessible open space. But this requirement will come at a price of significant numbers of tall and very tall buildings and/or reduced affordable housing, if the housing targets in the Local Plan come anywhere near being achieved.
100	1916	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP8		The reality of open space remaining 'publicly accessible' once a development has been completed has also proved illusory in many instances in London and needs very tight control through planning conditions and S106 requirements. To date planning approvals granted by OPDC include roof gardens on top of residential towers, but little open space usable and accessible by the public
100	1917	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP9		Policy SP9 requires buildings and public realm of the highest design quality. OPDC arrangements for ensuring design quality involve an external Place Review Group with a membership sourced from CABE Building Environment Experts. The series of assessments of applications that have been undertaken to date by this body have exposed the gulf between the views of such experts and those of the general public. We would welcome Local Plan requirements that ensure that the views of lay representatives of the local community form part of the deliberations of the Place Review Group.
100	1918	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP9		Draft Policy SP9b requiring delivery of high densities and a range of building heights, including tall buildings is largely meaningless without further definitions of 'high density' and 'tall buildings'. We do not see why it should be a strategic objective of the Local Plan to deliver tall buildings per se and consider this policy to be unjustified8

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100	1919	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Strategic policies	SP9		Policy SP10 is based on the OPDC view that: The timing and phasing of delivery will be a critical factor in the successful regeneration of Old Oak (page 43). As acknowledged, this view has fed into site allocations and annual homes targets which (we consider) are already unduly influencing decisions on planning applications. As set out in paragraph 27 below we consider this and Policies D11 and D12 to be unjustified.
102	2022	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP1		The proposed development would make it much more difficult for tenants to rent as higher rents would prevent their inclusion and wealthy individuals coming into the area and increasing rather than alleviating pressures on the PRS in Harlesden cause worry as seeing the development being the last nail in the coffin for a very deprived area;
102	2025	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP5		in general, Harlesden Lets welcomes the creation of new jobs and a fairer economy.
102	2026	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP4		also is encouraged by the proposed range of housing types
102	2027	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP1		it is important to recognise that Brent is and should continue to be an area of great diversity.
102	2028	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP1		Harlesden also hopes that aspects of Brent's Regeneration Strategy are included in this proposed development. https://www.brent.gov.uk/media/916136/regeneration_strategy.pdf
102	2032	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP2		Harlesden Lets agrees that the materials used in buildings, streets, open spaces and infrastructure should be designed to last but also be sustainable and easily-recycled.
102	2033	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP3		The health inequalities in London, and particularly in areas such as Harlesden are a major concern and well-being through the provision of open spaces is important. However, it is also important that the design, size and practicality of living accommodation is also considered a priority.
102	2034	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP3		Strong communities and the impact of community investment are explored in this document that is predominantly relevant to RSLs and Social Housing but also shows how wellbeing is improved that can directly impact and reduce the costs in health care, crime and public resources. http://www.hact.org.uk/sites/default/files/uploads/Archives/2014/3/MeasuringSocialImpactHACT2014.pdf?sid=9120
102	2036	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP5		It is important that the London Living Wage is encouraged but it also needs to be recognised that the development will need to provide dwellings where residents on the London Living Wage will be able to live.
102	2038	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP4		As part of the strategic policy for housing there should be a mix of housing types but with the overwhelming priority on social rented housing at rents that people on low incomes can afford. Only by this means will the production of private rented homes be a tenure of choice, rather than, as now, the tenure of last, desperate resort.
102	2042	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP2		There should also be use of off-site manufactured homes, which could be placed temporarily on sites which it will not be possible to develop with permanent homes or other uses until later in the programme, as well as longer lasting, permanent or semi-permanent homes. In addition to meeting the needs of existing residents in and around the regeneration area, they might also accommodate some of the many construction workers on the site.
102	2062	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP3		High density living is a concern as this normally translates as high-rise tower blocks with a priority of number of units being generated and contradicts the desire for a healthy environment with wellbeing at the centre.
102	2064	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP4		Diversity in design should be recognised so that apartments, houses, town houses, mansion blocks as well as dwellings for elderly residents and easily-adaptable homes for disabled people are all part of the mix.
102	2086	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP3		The policy is unsound, it is not positively prepared. The strategic policy and its supporting text is silent on a number of key issues that have significant impact on health and health inequalities in the OPDC area and the wider housing market assessment area - including air quality (with the exception of indoor air quality mentioned in 3.22), overcrowded homes and gypsy and travellers' accommodation.
102	2087	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP3		In terms of overcrowded homes, the objectively assessed housing need for the housing market area highlights that 26.7% homes (84,227 in 2011) in the housing market area are overcrowded. Overcrowding has a huge impact on health including links with TB, accidents in the home, mental health, respiratory and infectious diseases, educational development and difficulties for children in finding space to study, lack of privacy, anxiety and depression. According to the Runnymede Trust and others, there is a higher prevalence of overcrowding in BAME households.
102	2089	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP3		Gypsies and Travellers (both adults and children) continue to experience some of the poorest health outcomes in our society, including the lowest life expectancy of any group in the UK (10% less than the general population) and high infant mortality rates.
102	2090	Community Group	Jacky Peacock	Harlesden Lets	Strategic policies	SP3		Policy SP1 Catalyst for Growth (c) ii & iii and paras 3.4 & 3.5: clearly assert that the regeneration of Old Oak and Park Royal will bring tangible benefits for local communities and offers life improving conditions. This clearly follows on from the Spatial Vision which is quite emphatic on the delivery of such benefits. This policy SP3 must fit closely with this. It must specifically reference in policy that proposals should support reducing the specific existing health and health inequalities highlighted above and provide more detail in the supporting text.
103	2107	Local Resident	Dave Turner		Strategic Policies	SP5		We think Strategic Policy SP5 - protecting Strategic Industrial Land (SIL) at Park Royal (because it is important to London's economy) - is restrictive; it limits the scope for mixed use development within SIL areas on the Old Oak side of the development zone. As a result, there's more likely to be a continuation of harmful industrial development on the SIL land that surrounds the railway cottages and Midland Terrace. The OPDC's use of such hard 'zoning' policies is inflexible. There should be a mixed-use and a buffer area around the Railway cottages.
106	2222	Local Resident	Catherine Sookha		Strategic Policies	SP3	6.47	The Air Quality Study recommends the adoption of a Local Emissions Neighbourhood Policy (p. 67) They note that the OPDC's OAPF aimed to: "Achieve EU established health-based standards and objectives for a number of air pollutants (NOX, PM10 and PM2.5)." (p. 28). The LEN is discussed in Policy SP3 but the wording needs to be strengthened and brought explicitly into the policy box, and not simply

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								discussed in the text. [OPDC should] Replace and place in policy box: The OPDc will work with TfL to implement a LEN across the whole opdc and neighbouring areas. Otherwise new developments simply bring large numbers of people into the most polluted areas.
106	2227	Local Resident	Catherine Sookha		Strategic Policies	SP3	3.22	Policy SP 3 (3.22) notes that “People spend 90% of time indoors”, suggesting that pollution controls are most relevant to interior living. This was the theme of mitigation at the Mitre Yard Planning Committee. However, this does not account for the sustained use of specific areas by specific, vulnerable groups e.g. children’s play spaces on high risk areas of ground floor and roofs need to be assessed for air quality compliance; elderly use of outside spaces; regular walking along polluted routes to schools and neighbourhood facilities by children and families. This is indicated in: [EU4 para 6.55 and 6.57]
107	2234	Residents Association	Mark Walker	TITRA	Strategic Policies	SP2 SP4 SP9		The draft plan frequently discusses “tall buildings” or “a variety of building heights, but doesn’t explicitly say these mean in Policies SP2 or SP4, nor in Policy SP9 on the Built Environment. Left unchanged, this means that existing residents can’t work out if the plan has overly-dense or excessively tall buildings, until the individual planning applications are submitted by developers and clarification sought as a separate exercise.
107	2238	Residents Association	Mark Walker	TITRA	Strategic Policies	SP3		TITRA is concerned that this Local Plan doesn’t follow NPPF guidelines requiring clarity and accessibility for the reader. The current draft has no clear definition of housing densities in its main text or map showing densities, both of which the previous plan contained. Instead, this plan’s Policy 3.4 and its Density Matrix uses the OPDC’s own ‘local context’ which assumes housing densities that are higher than those used in the London Plan. The plan’s discussion of “indicative” housing densities, ranging from 300-600 units/hectare, are buried in the separate Development Capacity Study document. TITRA believes that information on the OPDC’s intended housing densities isn’t presented accessibly.
107	2240	Residents Association	Mark Walker	TITRA	Strategic Policies	SP5		TITRA believes that Strategic Policy SP5 on Economic Resilience to be over-restrictive in its protection of SIL and does not comply with the NPPF guidance. The plan’s draft Policy SP5 protects Strategic Industrial Land (SIL) at Park Royal (because it is important to London’s economy) but it in doing this, it limits the scope for mixed-use development within SIL areas on the Old Oak side of the development zone, such as those surrounding the railway cottages and Midland Terrace. The OPDC’s use of rigid ‘zoning’ for development isn’t right over a 2016-2036 timeframe when so much could change. Policy SP5’s sub-paragraph d) supports providing small workspaces in Old Oak and Park Royal and sub paragraph f) wants to ensure that design proposals flex to changing needs but sub-paragraph a) undermines them, because it protects/enhances Park Royal SIL. As a result, TITRA doesn’t think Policy SP5a, and Policy SP5 as a whole, are fair or justified.
107	2241	Residents Association	Mark Walker	TITRA	Strategic Policies	SP7	b.i	TITRA supports a policy SP7b(i) of minimising the need to travel but wants less restrictive policies on having mixed use on Strategic Industrial Land; this would to give companies and individuals more flexibility in deciding their daily commuting options
107	2242	Residents Association	Mark Walker	TITRA	Strategic Policies	SP7		We strongly object to the idea for a 9-metre wide elevated bridge over Old Oak Common Lane, which would dominate local housing and newly-built flats at the old Hilltop Works site, especially since TfL originally proposed a tunnel crossing to residents – this more sensitive option should be further investigated.
107	2243	Residents Association	Mark Walker	TITRA	Strategic Policies	SP7		TITRA asks for much greater clarity over the proposed ‘Wormwood Scrubs Street’ along the Northern boundary of Wormwood Scrubs and whether it is open to all traffic, which could change the character of the Scrubs area unless handled extremely sensitively.
107	2244	Residents Association	Mark Walker	TITRA	Strategic Policies	SP9	b)	The Built Environment chapter’s Policy SP9b proposes the “delivery of high densities and a range of building heights, including tall buildings” but it is vague without giving definitions of ‘high density’ and ‘tall buildings’. We object to this policy on the grounds of lack of clarity in the plan over what constitutes tall buildings and how they might enhance or harm the area.
110	2308	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP1(c) ii, iii	3.4, 3.5	Policy SP1 Catalyst for Growth (c) ii & iii and paras 3.4 & 3.5: clearly assert that the regeneration of Old Oak and Park Royal will bring tangible benefits for local communities and offers life improving conditions. This clearly follows on from the Spatial Vision which is quite emphatic on the delivery of such benefits. But certainty and clarity as to the effective and meaningful delivery of tangible benefits are absent or not adequately expressed elsewhere. There are detailed points raised in the responses to Strategic Policies SP3, Sp4 and the thematic policies T5, H2 and E1 which cast doubt on the Plan’s ability and capacity to deliver the necessary benefits around transport, housing and employment. There are also criticisms on such issues as social infrastructure, environmental sustainability and implementation, current and planned.
110	2309	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP2, SP9		For the GUA these 2 policies are intertwined. ‘Good Growth’ is a rather nebulous concept whose definition and attributes lack precision and measurability. And in this respect baselines and standards for environmental aspects should be specified throughout relevant policies of the Plan. They fail to provide a proper planning framework that will achieve high quality liveable and inclusive, sustainable Lifetime Neighbourhoods, town centres and places of work etc that are accessible to people of all ages, ability/disability and incomes. This is elaborated elsewhere in the GUA response particularly under the thematic policies. NPPF paras 69-70 on facilitating social interaction and creating healthy, inclusive communities will not be realised.
110	2310	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP2, SP9		Still relevant from Regulation 18 response: The policy needs to give greater directional steer for creating exemplary developments. Intense, very dense urban developments that are planned through this Local Plan have forms, scales and interrelationships that multiple and concentrate demand and pressures on the environment. The Local Plan needs to and will secure the implementation of the best possible practical means available at the time to create exemplary developments. It is understood that best practical means and other important environmental principles are handed down from the Treaty of Lisbon (not from EU Regulations) and will not necessarily be transposed automatically into UK law.
110	2311	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP3		This strategic policy and its supporting text is silent on a number of key issues that have significant impact on health and health inequalities in the OPDC area and the wider housing market assessment area - including air quality (with the exception of indoor air quality mentioned in 3.22), overcrowded homes and gypsy and travellers’ accommodation.

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								Overcrowded homes The objectively assessed housing need for the housing market area highlights that 26.7% homes (84,227 in 2011) in the housing market area are overcrowded. Overcrowding has huge impact on health including links with TB, accidents in the home, mental health, respiratory and infectious diseases, educational development and difficulties for children in finding space to study, lack of privacy, anxiety and depression. According to the Runnymede Trust and others, there is a higher prevalence of overcrowding in BAME households. Gypsy and Travellers Accommodation There are serious drainage problems on the Bashley Road site and associated health and safety problems (including rats) and inadequate basic facilities. Residents suffer pollution including noise and vibration from neighbouring industries sometimes also at night. The entrance to the site is a long and extremely poor-quality road with no paving (worse than other areas in Park Royal) and is poorly lit. Adults and children suffer poor health. Gypsies and Travellers anyway continue to experience some of the poorest health outcomes in our society, including the lowest life expectancy of any group in the UK (10% less than the general population) and high infant mortality rates. Air quality Poor air quality can, as highlighted in 6.45 (policy EU4), reduce life expectancy and contribute to a number of illnesses. 6.46 provides more detail relating to the OPDC area.
110	2312	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP3		Policy SP1 Catalyst for Growth (c) ii & iii and paras 3.4 & 3.5: clearly assert that the regeneration of Old Oak and Park Royal will bring tangible benefits for local communities and offers life improving conditions. This clearly follows on from the Spatial Vision which is quite emphatic on the delivery of such benefits. This policy SP3 must fit closely with this. It must specifically reference in policy that proposals should support reducing the specific existing health and health inequalities (highlighted above) and provide more detail in the supporting text.
110	2313	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP4(a)i		SP4 (a)i doesn't secure housing to meet objectively assessed local need above 'London-wide' needs which could deliver negative impact in the housing market area - particularly relating to affordability for below median income households and family sized homes. SP4(a)i should be amended to: 'homes that provide a proportionate level of all types of homes to meet objectively assessed need for the housing market area (as required by the NPPF) which will positively contribute to meeting London-wide need.
110	2314	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP4(a)ii		SP4 (a)ii The OPDCs evidence base does not provide evidence to support delivery of a 50% affordable housing target.
110	2315	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP4(a)ii		The target will result in a disproportionately high delivery of intermediate housing and a disproportionately low level of affordable rent housing (compared to objectively assessed need in the housing market area) that is a 30/70 LAR/intermediate housing compared to 86/14% objectively assessed need. This will not provide for delivery of the tangible benefits for local communities stated in SP1 3.5.
110	2316	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP4(b)		SP4 (b) – add after 'population', 'of all ages, abilities/disabilities and income' (to ensure delivery of mixed and inclusive communities)
110	2317	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP4		Add additional points SP4(c) securing delivery of active community involvement and ownership.
110	2318	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP4		Should add (d) delivering tangible and measurable benefit to existing deprived and excluded community members in surrounding neighbourhoods.
110	2319	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP5		This Strategic Policy is not sound as it inaccurately depicts the effects of the regeneration in terms of new jobs, and does not accurately relay the evidence contained in the supporting documents, Industrial Land Review, and the two Development Capacity Studies. It does not refer to the Park Royal Industrial Atlas which provides substantial evidence of thriving economic activities across the whole area including the significant successful business and over 3000 jobs in the Old Oak area.
110	2320	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP5		SP5 mentions providing 69, 700 "net additional jobs" in the plan period in the OPDC area, of which 67,900 could be delivered in the plan period. This figure from the Supporting Document 12. Development Capacity Study only refers to NEW jobs, which needs to be clearly stated. Significant job losses are anticipated, as shown in the Industrial Land Review. Furthermore, as it is anticipated that existing businesses and other uses will be relocated or re-provisioned, preferably within the OPDC area, according to Policy E1 bii), this necessarily detracts from the claim that the development capacity can accommodate the stated amount of additional jobs. This strategic policy, and the Employment Policies in Chapter 9 are unsound as they do not accurately use their own evidence, and establish unrealistic policies which contradict the statements concerning providing space for additional jobs. The OPDC Reg 18 Local Plan indicated that 55,000 new jobs in Old Oak and 10,000 new jobs in Park Royal were anticipated. Neither of these were net figures. In fact the Supporting Document 25. ILR indicates a net job gain in Old Oak of only 49,052, assuming the loss of all the existing 5,287 jobs, and a 4,216 net gain in Park Royal. They indicate across all land, including the HS2 parcels, a net employment gain of only 60,843, including 5874 industrial jobs lost across Park Royal and the HS2 parcels (p. 69).
110	2321	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP5		Furthermore, the ILR cautions against expectations that a market exists for intensified use of industrial land in the plan period potentially threatening the expectations of job and firm expansion in Park Royal. Thus the Park Royal additional job estimates are not based on sound evidence.
110	2322	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP5		The Revised Development Capacity Study prepared for the Regulation 19 consultation point 3.2 (p. 9) is clear that the targets of 65,000 jobs across the OPDC area are NEW jobs, not net, or "additional", which does not take account of job losses expected. This Study does not assess the potential for these jobs to be realized, nor take account of job losses, although relevant information on this is available elsewhere in the supporting documents (Document 25. ILR) and (although without any numbers attached) Appendix A of the DCS (Supporting

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								Document 12) which includes information on active enterprises which currently employ up to 5287 people, some of which do not wish to develop their land or be relocated, and are very committed to remaining in the area as this is the basis for their business e.g. active local authority contacts, or supply and delivery networks. For example, information from Cumberland Business Park site which is expected to contribute a count of 250 houses and 200 jobs. However, they note this is a site in multiple ownership where the landowners – who are businesses – are not all willing to develop their property. Significant job losses will ensue from this site, for example, one of these businesses, Capital Accounting with over 50 employees, and where ownership of the property is a significant contribution to the viability of the business. The data on jobs created presented in this Strategic Policy therefore makes no allowance for the closure and relocation of businesses and the loss of jobs. This policy and Employment Chapter 9 develops its targets without regard to the loss of significant business clusters, existing uses. It offers unrealistic strategies concerning their potential need for reprovision or relocation in the OPDC area, or elsewhere. Detail as to how these will be realistically achieved are not provided in Chapter 9 (see below). The damage to the existing economy and loss of jobs significantly detracts from the claims regarding what can be achieved in the plan period. It is substantially unsound because the policies which flow from it in relation to the existing land uses are unrealistic and unfeasible, as given the need to accommodate existing jobs, there is not space for the stated number of “new” jobs. The inaccurate use and incompleteness of the evidence base, renders this strategic section of the plan, and the related policies in Chapter 9 Employment, unsound.
110	2323	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP5		More than this, the failure to bring forward relevant evidence in the evidence documents under consultation is very serious indeed. It suggests that the OPDC is not being straightforward in its approach to the consequences of the development for local people and businesses, which can lead to a loss of faith and distrust. This is inappropriate for a public body and calls into question the veracity of the Local Plan as a whole, and the public and stakeholder engagement processes of the OPDC.
110	2324	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP6		1. There is a gap in the strategic policy inform how the new places will sensitively knit with and complement existing places within and surrounding the Old Oak developments particularly. The plan vision (13) talks of new development connecting local communities through high quality walking, cycling, public transport, and vehicular links and vision (10) about well-designed buildings that complement surrounding neighbourhoods. The latter has no defined ways of delivering or measuring this through policy SP6 or other policies such as D1. However, there is huge risk that in terms of scale, size and type of development in Old Oak particularly (much of which would seem to be synonymous with luxury development) could create a separate defined boundary that is at adjunct with existing building types, its history and heritage (in terms of content as well as style) and communities. There is additional risk that this could create quite segregated rather than mixed and balance communities, with potentially inevitable rises in property prices and displacement of existing businesses, local infrastructure and indeed lower income households. Serious regeneration that supports existing communities within and surrounding the OPDC area is supported by the many groups and individuals that that engaged in trying to influence policy in the OPDC’s local Plan, through attending GUA meetings, forming Neighbourhood Forums and engaging in OPDC consultation sessions over a period of three years. The plan must facilitate this being realised. SP6 should specifically include – delivery of positive physical and community connections between existing places within and adjacent to the OPDC area, specifically avoiding detrimental impact and segregation.
110	2325	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP6		2. There is potential for the new cultural quarter and catalyst focus on achieving sensitive regeneration in the area – ensuring that it is accessible to new and existing communities within and surrounding the OPDC area in terms of age, ability/ disability and income levels. In response to the Old Oak and Park Royal Opportunity Area Planning Framework GUA members together suggested something that is multi-use including some community focused amenity spaces. Individual members of the GUA network have made a range of suggestions including cinema, ice skating, lido, community arts based facilities and museum celebrating the history and heritage of the area. SP6 should provide policy that ensures a cultural quarter and catalyst use building does support in achieving positive regeneration with in an existing relatively deprived area. Proposals should be drawn up in collaboration with local community members and be widely consulted.
110	2326	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP6		3. The policy should also actively support proposals for community empowerment and ownership – across boundaries of the OPDC area and neighbouring areas. Positive examples including those from large regeneration schemes and New Towns should be explored.
110	2327	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP7		This policy is not effective and justified. It should plan for categories of users with different needs and travel objectives. For example, the needs and user experience of the through traveller and that of the local user should be carefully considered and their differing requirements catered for.
110	2328	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP7		This should all be within a master planning approach that achieves transport connectivity with clear programming and delivery of upgrades, improvements and new infrastructure. All to minimise scale, complexity and cost and maximise integration with surrounding areas to reduce/mitigate existing congestion and predicted traffic demands.
110	2329	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP7		The policy should ensure the provision of both east and west accesses to Old Oak Common HS2 Station.
110	2330	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP7		The scale and nature of proposals for A40 and A406 need to be clarified.

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110	2331	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP7		The predicted increases in traffic into/out of Park Royal (from Park Royal Transport Study) will overwhelm the network and yet the provision of grade separation schemes is not the answer.
110	2332	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP7		Much is made of the Old Oak High Street, and its offer of seamless connections between 5 stations - clause gii) – but this will now be disrupted by TfL's demands to retain in the medium term the Crossrail/Elizabeth Line Depot as voiced at the OPDC Board meeting of 12 September 2017.
110	2333	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP7		The area wide promotion of minimal parking/car-free developments does not have evidence of precedents on this scale that this approach would function effectively, as parking controls will not necessarily reduce traffic (vans, cabs...).
110	2334	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP7		Still relevant from Regulation 18 response: The Local Plan should align itself to the best analysis of future transport needs and technical infrastructure, even though the subject is full of uncertainty. A range of scenarios with more visionary approaches to the nature of the network and available transport should be carried out and be made available for public scrutiny/consultation. The current proposals are quite traditional given the transport changes (driverless cars and demand-responsive transport for example) that are likely to occur between now and completion of development.
110	2335	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP7		Still relevant from Regulation 18 response: There is also a need to cater for a wide range of planning necessities that the OPDC and development will have to provide to create an enduring exemplar of sustainable development that is not locked into heavy inflexible infrastructure. Minimisation of the scale, complexity and cost of transport infrastructure in the area should be a guiding objective of this plan. Clause d) requirement of embedding and integrating transport infrastructure should recognise the need to do this in a sensitive and appropriate way.
110	2336	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP7		Still relevant from Regulation 18 response: All transport policies should be aligned with those of the boroughs, Transport for London and other transport operators so that interventions that the OPDC brings forth are designed where possible to also reduce existing congestion in the surrounding road network. This should be expressed as a policy approach within Policy. Furthermore, this policy and an associated programme of transport schemes, should prioritise the resolution of existing transport problems in Park Royal & Old Oak.
110	2337	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP7		Still relevant from Regulation 18 response: Policies on Walking, Cycling, Rail and Buses have generated many wide ranging, diverse suggestions for improvements, new routes, facilities etc. But given their often-individualistic proposals, it has not yet been possible to form a consensus and aggregate them for this collective submission. The OPDC should enable a continuing dialogue through the plan-making process with communities to allow these detailed proposals to be shared and considered to take these forwards.
110	2338	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP8		This policy is not effective. Whilst it is recognised that Policy SP8 Green Infrastructure and Open Space requires major developments to produce a wide ranging Green Infrastructure and Open Space Strategy and Management Plan (GIOSSMP), a component of this – the Green Space Factor and Green Points System score - has not yet been elaborated. Policy EU2 Green Infrastructure and Biodiversity' text para 6.31 does not add much.
110	2339	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP8		The policy needs to be amended to include an additional point in (a) providing active play for all ages. Whilst text para 3.21 states that Policy SP8 supports active play for all ages, this is not actually specifically referenced in Policy SP8.
110	2340	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP8		Although the policy at (a) (i) references the Policies Map for existing green spaces and open spaces – to be conserved and enhanced, only MOL and SINC's are portrayed.
110	2341	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP8		Still relevant from Regulation 18 response: To support better connections with nearby neighbourhoods it is proposed that the OPDC work with the boroughs to create additional green corridors, spaces and biodiversity provision throughout and around the OPDC area to mitigate the impact of development and enhance nature.
110	2342	Community Group	Sharon Hayward	Grand Union Alliance	Strategic Policies	SP10		This policy is not effective. This policy is intrinsically linked with Policy DI2 Timely Delivery and Optimised on which the GUA has responded below. Bringing forward as early as possible to meet the targets for housing and jobs, and to build confidence in the development, is not realising the full range of required benefits or contributing to wider infrastructure and sustainable development criteria; and a number of significant barriers to development remain to be overcome in relation to some key sites.
113	2717	Local Resident	Thomas Dyton		Strategic Policies	SP3	6.47	The Air Quality Study recommends the adoption of a Local Emissions Neighbourhood Policy (p. 67) They note that the OPDC's OAPF aimed to: "Achieve EU established health-based standards and objectives for a number of air pollutants (NOX, PM10 and PM2.5)." (p. 28). The LEN is discussed in Policy SP3 but the wording needs to be strengthened and brought explicitly into the policy box, and not simply discussed in the text. [OPDC should] Replace and place in policy box: The OPDC will work with TfL to implement a LEN across the whole opdc and neighbouring areas. Otherwise new developments simply bring large numbers of people into the most polluted areas.
113	2722	Local Resident	Thomas Dyton		Strategic Policies	SP3	3.22	Policy SP 3 (3.22) notes that "People spend 90% of time indoors", suggesting that pollution controls are most relevant to interior living. This was the theme of mitigation at the Mitre Yard Planning Committee. However, this does not account for the sustained use of specific areas by specific, vulnerable groups e.g. children's play spaces on high risk areas of ground floor and roofs need to be assessed for air quality compliance; elderly use of outside spaces; regular walking along polluted routes to schools and neighbourhood facilities by children and families. This is indicated in: [EU4 para 6.55 and 6.57]
114	2730	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Strategic Policies	SP2 SP4 SP9		We are concerned that the plan frequently discusses "a variety of building heights, a range of building heights, and to taller or tall buildings" but they aren't outlined in Policies SP2, SP4 or in Policy SP9 on the Built Environment. The current plan's lack of clarity means that existing residents can't work out if the plan has excessive building heights (that could overwhelm existing communities) or excessive density (putting strain on local services like transport and waste collection) until the individual planning applications are submitted by developers.
114	2736	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Strategic Policies	SP5		We think Strategic Policy SP5 on Economic Resilience to be over-restrictive in its protection of SIL and does not comply with the NPPF guidance. The plan's draft Policy SP5 protects Strategic Industrial Land (SIL) at Park Royal (for its importance to London's economy) but it is over restrictive and limits the scope for mixed use development within designated SIL areas on the Old Oak side of the development

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								zone. The OPDC's use of such hard 'zoning' policies is inappropriate for a 2016-2036 timeframe. The NPPF says "Planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed." Policy SP5's sub-paragraph d) supports providing small workspaces in Old Oak and Park Royal and sub paragraph f) wants to ensure that design proposals flex to changing needs but sub-paragraph a) undermines them as it protects/enhances Park Royal SIL. As a result we do not think Policy SP5a, and Policy SP5 as a whole are fair or justified.
114	2737	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Strategic Policies	SP7	b.i	We support a policy SP7b(i) of minimising the need to travel but would like to see less restrictive policies on having mixed use on Strategic Industrial Land. This would give companies and people more flexibility in deciding their daily commuting options.
114	2738	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Strategic Policies	SP7		We note proposals for new streets of Old Oak High Street, Park Road and Grand Union Street but navigating them may be difficult. We object to the idea for a 9-metre wide elevated bridge over Old Oak Common Lane, which would dominate local low-rise housing, especially since TfL originally proposed a tunnel. We believe this option should be further investigated.
114	2739	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Strategic Policies	SP7		We ask for greater clarity over the proposed 'Wormwood Scrubs Street' along the Northern boundary of Wormwood Scrubs and whether it is open to all traffic, which could change the character of the Scrubs area.
114	2740	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Strategic Policies	SP9	b)	The Built Environment chapter's Draft Policy SP9b proposes the delivery of high densities and a range of building heights, including tall buildings is largely meaningless without further definitions of 'high density' and 'tall buildings'. We object to this policy in the absence of real clarity in the plan over what constitutes tall buildings and how they might enhance the area.
115	2773	Local Resident	Nye Jones		Strategic Policies	SP5		We think Strategic Policy SP5 - protecting Strategic Industrial Land (SIL) at Park Royal (because it is important to London's economy) - is restrictive; it limits the scope for mixed use development within SIL areas on the Old Oak side of the development zone. As a result, there's more likely to be a continuation of harmful industrial development on the SIL land that surrounds the railway cottages and Midland Terrace. The OPDC's use of such hard 'zoning' policies is inflexible. There should be a mixed-use and a buffer area around the Railway cottages.
116	2794	Community Group	Mark Balaam	West London Line Group	Strategic Policies	SP1		The order of the first sub-paras should be revised, so that this section reads as follows:- "Development across the OPDC area should:- (a) Support the delivery of a new part of London, which is both a destination and a gateway to London and the rest of the UK (b) Provide a range of land uses... (c) Support the delivery of the new strategic transport hub and interchange at Old Oak Common This would give the usual order of moving from the general and/or larger points of, 'a new part of London,' and, 'a range of land uses,' to the particular, 'the new strategic transport hub.' It thus provides a more balanced perspective in allowing the hub to support the land uses rather than primarily anticipating that the area is to support the hub.
116	2795	Community Group	Mark Balaam	West London Line Group	Strategic Policies	SP1	3.2	We generally support this paragraph, but would suggest that in the sentence beginning, '[to] enable this...' be revised to read, '[to] enable this, proposals should support the timely delivery of this station, include strong links with other forms of public transport, particularly local rail services, and ensure that it is properly embedded...'
116	2796	Community Group	Mark Balaam	West London Line Group	Strategic Policies	SP1	3.8	Under 'White City Opportunity Area', we would suggest expanding this title to be, 'White City Opportunity Area and environs' and including positive references to (i) the proposed Westway Circus station, and (ii) the need to support the WCOA's neighbouring community in RBKC in and around the Grenfell Tower (best done in rail terms through broaching the West London Line by building the new station with a link under the WLL).
116	2797	Community Group	Mark Balaam	West London Line Group	Strategic Policies	SP7		We would also ask that this Policy includes reference to our proposed HS2-WLL link and raft with short linking viaducts to the West London Line (to the east of the raft) and the Chiltern Line, Dudding Hill Line (for the West Coast and Midland Main Lines) and Willesden Junction for the North London Line (to the west), as well as the options for interchange between up to 15 sets of rail services through a proximate and clement interchange facility that the Hub with the raft could provide.
116	2798	Community Group	Mark Balaam	West London Line Group	Strategic Policies	SP7		We are also proposing the conference/exhibition/performance facility above the raft, with mixed use on top, as well as appropriate uses in the arches or other spaces beneath the viaducts. We trust that there would be the appropriate height clearances where the viaducts west of the raft would cross the Victoria Road/Old Oak Common Lane junction.
116	2799	Community Group	Mark Balaam	West London Line Group	Strategic Policies	SP7	3.57	While we support this paragraph, it should go further, citing other areas that would be linked such as those served by the WCML and MML corridors, once the relevant local rail services reached the 'raft'
116	2800	Community Group	Mark Balaam	West London Line Group	Strategic Policies	SP7	3.58	There will not be a 'seamless interchange' between Hythe Road and the OOC Hub, but a 650-metre open-air walkway that crosses high above a canal, for those travelling by rail between the UK's largest rail nexus (Clapham Junction) and the country's premier international airport (Heathrow) and its new domestic high speed rail service (HS2). The OPDC, on behalf of the UK, should not be allowing this to be the best that can be produced – in ten years' time – to meet the ever growing demand for rail in general and especially between these three facilities.
116	2801	Community Group	Mark Balaam	West London Line Group	Strategic Policies	SP7	3.60 and 3.61	While we welcome the principle of Healthy Streets, we are unsure about the overall health benefits of the above walkway, as it is likely to be two canyons funnelling draughty airflows either side of a mid-air canal crossing.
116	2802	Community Group	Mark Balaam	West London Line Group	Strategic Policies	SP10	3.107	Given that, '[in] relation to infrastructure (including public transport provision (Para 3.106(a)), developers will be required to demonstrate to OPDC how infrastructure both above and below ground is being considered and in particular, how it can work with site-specific and/or area-wide strategies planned by OPDC or other landowners and/or developers...', may we assume that OPDC will be checking with public transport providers on how they are planning to meet the demands of OPDC's

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								residents and businesses as these grow in volume, together with those from other areas who will be using the same infrastructure. For example, how will the HS2/Elizabeth Line interplay at Old Oak Common impact on OPDC's housing targets and residents throughout the period from 2026 (when the latter can first access the OOC Hub, but by when the rest of the Elizabeth Line will have had seven years' growth) to 2083 (when HS2 Phase 2 to Newcastle will only be 50 years old)?
116	2803	Community Group	Mark Balaam	West London Line Group	Strategic Policies	SP10	3.107	We note from the Guardian of 28 Jul 2016 that 580,000 arrived in London by rail on one day in Autumn 2015. At Para OOC.7 TfL have quoted 250,000 passengers (presumably per day) will be interchanging within the station and a further 42,000 will be leaving it to seek other modes. When does TfL say these figures are going to be reached? How many of the 75-100,000 new residents (most of who will be living close to the Hub) have been included? How robust is this modelling, given that most initial outturns of new rail projects have been three times the last pre-opening forecasts, and these have been only for stations or lines not interchanges such as OOC? How adequately will the two London HS2 'exits' of Euston and the Elizabeth Line cope by 2083 for all HS2 northern catchments that lie between Newcastle, Liverpool and Birmingham? Should there not be other rail access options at OOC to:- • Ensure HS2 can still operate to Central London, if there are problems at Euston? • Spread the HS2 loads from the north across London and the south, without putting more pressure on other London termini and the Underground (including Crossrail2) between them? • Meet the OPDC area's demand for its own in-bound commuters? • Move with the trends of cross-city and (especially in London) orbital rail travel? • Allow for the options of HS2-Gatwick and/or HS2-HS1 through trains? If there is to be such growth, why does TfL only forecast 8,000 passengers between Hythe Road station and the Hub? We note that, despite TfL indicating that Hythe Road will deal with the expected demand from the Westway Circus catchments, there appears to be no mention of this in the Plan, let alone any comprehensive suggestions as to planned walking route improvements between these two areas.
118	2830	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Strategic Policies	SP10		Draft Policy SP10 states that proposals should support the delivery of the spatial vision by enabling a comprehensive and integrated approach to development and infrastructure that supports and brings forward development in accordance with, or in advance of, the phasing identified in figure 3.16, to support OPDC's homes and jobs targets. Within Figure 3.16 our client's site is identified as falling within an area that comprises 'ongoing industrial intensification'. Our client's site should be identified as falling within an early phase of development 0-5 years as the implemented planning permission can be completed at any time.
119	2834	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	Strategic Policies	SP8		The Trust supports: - Conserving and enhancing existing green infrastructure and open spaces identified in the Policies map. - The appropriate provision of new green infrastructure and open spaces, that meet the needs of the development. - Improving the ecology of the area and ensuring an overall net gain in biodiversity by conserving and enhancing existing biodiversity habitats, and by the delivery of new biodiversity habitats. - That the development successfully integrates with the wider green infrastructure and open space networks but without damaging the semi-wild nature of Wormwood Scrubs
119	2835	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	Strategic Policies	SP8		The Trust remains opposed to direct access from the proposed station area into Wormwood Scrubs on the grounds that it would lead to a deterioration of the existing green infrastructure.
119	2836	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	Strategic Policies	SP9		The views from Wormwood Scrubs should be given appropriate protection.
119	2837	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	Strategic Policies	SP9		There should be an unambiguous statement that buildings between the northern edge of the Scrubs and the Station should be of the lowest height.

Places

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1	1	Community Group	Del Brenner	Regents Network	Places	P3	GUC. 1	I have been going through the draft text for the Regulation 19 version of the Local Plan that you presented to the Board on 22nd June, and I have many concerns about the Grand Union Canal Policy P3. I have noted a (large) number of queries and errors that will be dealt with through the consultation process. Text correction However, there is one glaring text error that cannot be accepted and requires an urgent correction, hopefully before the draft Plan goes live on the website for consultation. The Plan attributes the Canal and River Trust as landowner! It states that “The Canal and River Trust is a key stakeholder as the landowner of the canal and elements of canalside sites” (Policy P3 Supporting text, Para GUC1). The nations’ network of canals, including the Grand Union Canal, is in public ownership. Our canals are held by Government under the 2012 Waterways Infrastructure Trust “in perpetuity for the nation”. In other words, you are the proud owner of the Grand Union Canal in the OPDC area along with me and the rest of the population! The Canal and River Trust is only a management organisation, with great responsibilities of course for maintenance etc, but not ownership of the canals. It is not a charity as such (like Oxfam and the like), it is a management organisation with charitable status. This is a common attribute that many organisations acquire (such as colleges and hospitals, for instance) which enable it to raise funds and have tax benefits. I hope that is clear. Biased consultation It is imperative that the text correction is made, otherwise the manner in which the Grand Union Canal issues are considered and assessed in the OPDC area may be seriously prejudiced, and unsafe in legal terms. It is a very general impression, sadly, that the Canal and River Trust are said to be owners of our canals (and including by the OPDC tragically), and this has a marked and biased effect on the general attitude towards our canals, and leads to misinterpretation and skewed conclusions and decisions. It may account for the innumerable misconstrued and incorrect information and recommendations in Policy P3, which in patches is not good quality. Details of these errors and omissions will be dealt with in the consultation process. And this time it would be welcome if the OPDC took proper heed of the requirements and merits of the Grand Union Canal, with no fudging. Authorisation for the correction It is noted that in the report to OPDC of the Local Plan, it is agreed “to delegate to the Director of Planning, in consultation with the Chair of the Planning Committee, the making of minor edits to text and maps, and desk top publishing”. In that case, the necessary correction as requested above can be carried out in a formal manner. It also should be noted that the No.4 footnote reference number seems to be missing from the text.
1	2	Community Group	Del Brenner	Regents Network	Places	P3		It is important to note that the canal is a ‘navigation’ first and foremost, and this phrase should be used by OPDC. The demesne of the canal is from the back of the towpath to the outside of the canal wall structure on the off-side. North bank towpath In the 1793 Grand Junction Canal Company Act for the construction of the GUC Paddington Arm, the proposal was for the canal to have a towpath on both sides, which was an innovative idea to provide two-way traffic so the horses did not have to pass one another on the same towpath. However, although some of the north bank towpath may have been prepared, the plan was not seen through, probably because of shortage of money for the purchase of the land on the northern bank. Interestingly, there have been a number of instances where the strip of land on the northern bank of the canal has been found to be unregistered.
1	3	Community Group	Del Brenner	Regents Network	Places	P3	GUC. 6	An opportunity is there to provide a clear cycle route along the northern bank of the canal, for the full length of canal within the OPDC boundary, rather than a token stretch at the eastern end. This has been suggested a number of times, but as yet OPDC has failed to provide a coherent and dedicated cycling network, and has sidestepped a number of requests and suggestions of dealing fully and competently with cycling. It should be noted that at a recent GUA meeting (13th June 2017) the cycling representatives clearly stated that they did not want a shared route along the canal towpath. For the OPDC to continue to make the suggestion of the towpath being a cycling route (even if it is a so called ‘quiet way’) is a nonsense and completely unworkable. It is about time OPDC got their act together (properly this time) on the matter of cycling.
9	16	Statutory Consultee	Ronan Torkildsen	Historic England	Places	P10		"Scrubs Lane has a rich historical context that can positively shape new development (SL. 15)" The OPDC will be aware of Historic England’s expressed concern with the proposed, and now approved, tall building at Mitre Yard, Scrubs Lane, a development that we considered would cause harm to the setting and significance of both the adjacent St Mary’s Cemetery Conservation Area and Kensal Green Cemetery, a Grade I Historic Park and Garden containing c140 listed structures and monuments, many identified as ‘at risk’ on the national register. Kensal Green Cemetery was the first of the capital’s ‘magnificent seven’ burial grounds and contains the greatest number of listed monuments. As the Local Plan proposes a tall building and other sizeable development in clusters along Scrubs Lane (P10C 2, 3 and 4) Historic England reiterates its view that the OPDC should have due regard to paragraph 132 of the NPPF and the great weight that should be given to an asset’s conservation affected by a proposed development. It is vital the significance and sensitivity of the setting of St Mary’s and Kensal Green Cemeteries, in particular, are appreciated and positively addressed. Any harm to the significance of an affected heritage asset would need to be fully justified.
9	17	Statutory Consultee	Ronan Torkildsen	Historic England	Places	P10		We understand that there is an intention to produce a masterplan, and/or a further early review of the Plan to provide a greater level of spatial and design detail. This will offer a welcome opportunity to formally assess and then respond to the setting of the St Mary’s and Kensal Green

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								Cemeteries with the preparation of a historic landscape setting assessment. To inform this work we would strongly encourage reference to The Setting of Heritage Assets advice (GPA3). In turn this evidence can inform a suitable contextual response; a consideration of potential less damaging alternatives; measures to minimise or mitigate potential harm, and; shape a coherent building heights strategy along Scrubs Lane (Policy P10 and SL.17). Masterplaning, and further associated urban design analysis and modelling, in accordance with expectations of the London Plan, will also be able to inform the proposed heights, massing and locations for new sizeable development and to appreciate the potential cumulative impact on the townscape/landscape and an appropriate response as a consequence. This additional layer of detailed planning can also then develop the current understanding of the potential impact of sizeable towers on the designed views and setting of significant historic landmark across the capital.
10	23	Planning Consultant	Matt Hill	Maddox Planning Consultants (on behalf of Culinary Quarter (London) Ltd)	Places	Site Allocations	2 Portal Way	As set out above, we support the pro-growth strategy contained within the Local Plan and identification of sites to contribute towards the delivery of housing. It is noted that within the Local Plan 2 Portal Way is one of the sites identified within the site allocations table in chapter 4. The table identifies 2 Portal Way as being capable of delivering 300 residential units over the first ten years of the plan period, alongside the provision of 3,600 sqm of commercial floorspace and 180 new jobs over the plan period. The revised Local Plan sets out that the allocation table and figures associated to each site have been obtained from the Development Capacity Study that accompanies the Local Plan and is also open to comments as part of this consultation. Our review of the Development Capacity Study has found that the capacity figures identified for 2 Portal Way (as set out above) are 'potential capacity' figures and have not been tested. This therefore suggests that these are flexible to change subject to reasoned justification. We agree with the findings of the capacity study in that 2 Portal Way is suitable, available and achievable for housing and economic development within the plan period. However, our client is of the view that the site's current identified capacity figures, as set out within the study and revised Local Plan, do not accurately reflect the site's ability to accommodate a greater quantum of housing and commercial development which would also generate a greater number of jobs. Our client has undertaken a detailed review of the site's opportunities and constraints, which has allowed for a fundamental and comprehensive assessment to be made. This has resulted in a draft planning application being prepared for the site which makes the very best use of the finite land resource that it offers and provides a greater quantum of development. The assessment of the site has involved the production of a number of technical reports that have confirmed that the following quantum of development can be secured without causing any detrimental harm: - Circa 380 residential units; - Circa 5,000 sqm of commercial floor space; and - Provision of approximately 300 jobs on site. The above scheme has been subject to a number of pre-application discussions with the OPDC, Ealing Borough Council and the Greater London Authority where the principle and quantum of development has now been generally agreed. As a result, it has been confirmed that the site is capable of delivering a greater residential and commercial capacity than what is currently identified within the Development Capacity Study and revised Local Plan. Changes sought In summary, we support the preparation of the Local Plan and the allocation of 2 Portal Way within the proposed Plan. However, we consider that the current development capacity identified for the site within the Local Plan is too low and does not reflect the actual quantum of development that can be achieved on site. Our client therefore requests that both the Development Capacity Study and revised Local Plan allocation table are amended to reflect the greater quantum of development that can be achieved as set out within this letter and shown in the table below. 2 Portal Way: Amend 300 to 380. Amend 3,900 to 5,000. Amend 180 to 300. Thank you for the opportunity to respond to the Local Plan consultation. We hope these comments are of assistance and would be grateful for confirmation that they have been considered as part of this consultation. We also confirm that we would like to be involved in the future stages of the Local Plan preparation.
12	44	Statutory Consultee	Liz Goodwin OBE	LWARB	Places			LWARB supports the inclusion of reference in the "Places" section of the plan to the benefits the circular economy could bring to through exchange of goods and services and resource reuse. LWARB supports the inclusion of reference to the food sector businesses in Park Royal as an example of this. Another existing example of this type of beneficial service is the Library of Things. Like a traditional library it allows borrowing of items, but these can include a much wider variety such as drills, barbeques, carpet cleaners, kitchenware and events equipment at very low prices. It also provides training on how to use them. This helps the community to be able to access more items without the need to spend large amounts of money. The Library of Things has also demonstrated such services help to build community and a sense of place.
13	52	Developer	Paul Gilfedder	HS2 Ltd.	Places	P1		Chapter 4 Site allocations table demonstrates OPDC's supply of land for new housing and commercial floorspace. The Old Oak South allocation includes Old Oak Common Station for the delivery of these types of development. The site specific policies P1 Old Oak South and P1C1 Old Oak Common Station cluster require proposals to support the establishment of a commercial hub around the station by delivering a significant amount of B floorspace and optimise development in response to the place's transport accessibility and significant investment in the area. As drafted HS2 Ltd. consider these policies to be unsound. These policies are based on development assumptions at the Old Oak Common Station site that there is no evidence to suggest that they can be achieved and furthermore this type of development, or any enabling works associated with it, is not within HS2's scope to deliver. HS2 Ltd. would suggest that, as with the spatial policies, these policies are drafted more flexibly to allow for a range of development scenarios. The proposals as drafted are not supported by detailed studies or funding.
13	55	Developer	Paul Gilfedder	HS2 Ltd.	Places	P9		Policy P9 and the associated policy map refer to Plantagenet House as a 'building of heritage interest'. The policy requires proposals to conserve and enhance the proposed locally listed Plantagenet House and its setting. Upon Royal Assent HS2 Ltd. gained powers to demolish this building as part of the set-up of the Atlas Road construction compound. Due consideration was given in developing the ES

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								scheme so as not to unnecessarily demolish buildings . In doing so HS2 Ltd. has only taken land necessary for the construction of the high speed railway. Therefore this proposal is unsound as it does not reflect the Act powers and proposals.
13	56	Developer	Paul Gilfedder	HS2 Ltd.	Places			The policy diagrams in the plan only depict the end-state aspirations of the plan. The policy diagrams relating to proposals relating to Old Oak South and Old Oak Common are unsound as they are not justified or effective. They rely on and propose a station design that there is currently no commitment to construct or enable, and there is no evidence that they can be delivered. HS2 Ltd. suggest the plan should include diagrams showing both the end-state aspirations and HS2's currently committed Act scheme for 2026 (i.e. phasing plans) which would make the plan sound in this matter. HS2 Ltd. are working closely with OPDC and your consultants on the masterplan for the area and believe that this work be incorporated.
14	63	Agent	Leonie Oliva	Deloitte LLP (on behalf of Imperial College)	Places	P7		Like OPDC, Imperial acknowledges the opportunities that exist in the North Acton and Acton Wells area, and therefore welcomes its inclusion as Policy P7 in the draft Local Plan. An opportunity which has rightly been recognised in Policy P7 is that for new purpose built student accommodation, which is recognised as an appropriate land use in the area. Imperial also recognises the importance of new homes, especially of the affordable designation, in North Acton and the rest of the Old Oak and Park Royal. With the University a key employer across the OPDC area, regular housing is of course of significant interest to its staff, and so Imperial supports every effort to facilitate much needed new supply. Policy P7, 'North Acton and Acton Wells', gives mention to the delivery of high quality tall buildings being delivered in appropriate locations. Policy D5, 'Tall Buildings', also recognises the important role tall buildings in the appropriate places can play in delivering increased development capacity and positively shape the skyline. Imperial also recognises the positive role well-designed tall buildings can play in the OPDC area, and is therefore supportive of their positive inclusion as a policy in the draft Local Plan.
15	64	Agent	Mark Underwood	Deloitte LLP (on behalf of Diageo)	Places	P4		Site Descriptions There are two sites which will be discussed in these representations. The first, the 'Twyford Abbey Road site' comprises the existing area of open space to the north of the First Central development, bounded by Lakeside Drive to the south, Twyford Abbey Road to the north, Bodiam Way to the east and the railway to the west. The second, the 'Lakeside Drive site', comprises a strip of land bounding Lakeside Drive to the east and the Industrial area (designated as a SIL) to the east. Again, it is a grassed area containing semi-mature trees and shrubs. The Twyford Abbey Road site is mainly grassed with some trees lining the edges and footpaths cutting through and a sports pitch located in the north-eastern corner. It is surrounded by residential development to the north which is predominantly two-storey houses and south of the site which is part six, part eight storey residential flats and a residential led mixed use scheme to the east which is part three, part four storeys in height fronting Twyford Abbey Road and eight storeys to the Lakeside Drive frontage. To the west of the site is protected natural space designated as a Wildlife Corridor and a Grade II SINC ('Diageo Lake and Coronation Gardens'). The site has a PTAL rating of 3 and has a bus stop nearby. The Lakeside Drive site has eight storey residential flats in the First Central site to the west of the site at the northern section. A planning application (reference 17/0076/FUMOPDC) is currently with the OPDC for the Fairview scheme to the west of the site at the southern section of the site which proposes a residential led mixed use scheme with buildings up to 27 storeys in height. On the eastern boundary is the Origin Business Park which contains a number of warehouse buildings. The site has a PTAL ranging between 1a and 3. From an online review neither site appears to have any planning history although both are surrounded by recent and pipeline developments including the First Central and Fairview schemes. Both sites are considered to be underutilised in their present state, and given the context of their location. Diageo are keen to bring forward further development in the First Central Area, and have identified Site 1, as a suitable development site for the provision of new residential dwellings. This is in keeping with its proximity to the existing residential development at First Central, and the residential character of the surrounding area. However, it is understood that the current draft version of the OPDC Local Plan does not promote the Twyford Abbey Road site for development, but does promote the Lakeside Drive site for development, as part of Site Allocation 27 'First Central' and as part of the Brewery Cluster (draft Policy P4C1). The Lakeside Drive site is promoted in the plan as contributing towards the delivery of 1,200 residential units, 8,000 sqm commercial floorspace and 400 new jobs within the First Central site allocation, whilst Policy P4C1 'Brewery Cluster' restricts provision of residential uses adjacent to the SIL and seeks the delivery of appropriate employment uses along Lakeside Drive.
15	65	Agent	Mark Underwood	Deloitte LLP (on behalf of Diageo)	Places	P4		Draft Local Plan's Approach to the Sites The OPDC Revised Draft Local Plan includes changes in relation to the two sites which have occurred between the first draft issued in February 2016 and the current revised draft issued in June 2017. The key changes are noted in relation to each site below. 1. Twyford Abbey Road Site The draft Local Plan issued for consultation in February 2016 had a number of figures which showed different policy indications: · Figure 12 'Illustrative Masterplan' and Figure 39 'Park Royal' shows the site as Existing Residential; · Figure 77 'Indicative phasing of housing delivery' indicates housing being delivered on site between 2022 and 2037 with Figure 138 'Indicative phasing' supporting this; · Figure 10 'Key Diagram' showed the site as a Mix of Uses; · Figure 64 'Proposed and existing open spaces' indicates that the site is not allocated as existing open space but is located within 400m of existing open space. This version of the plan is supportive of the site for redevelopment, which Diageo are supportive of.

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								In the OPDC Revised Draft Local Plan June 2017 the site is no longer identified as a proposed residential site. Figure 3.4 'Land Uses' indicates the site as Mixed Use Area while Figures 3.11 'Open spaces' and 4.24 'Park Royal West' identify the site as open space. A review of the consultation comments as summarised by the OPDC on the 2016 draft of the Local Plan indicates that no comments were made against a residential allocation on this site. Therefore Diageo express concern over this unexpected and unsupported change in approach to this site. Diageo are supportive of allocating the site for future residential development for reasons set out later in this letter.
15	66	Agent	Mark Underwood	Deloitte LLP (on behalf of Diageo)	Places	P4		2. Lakeside Drive Site The initial draft version of the Local Plan published in February 2016 showed the Lakeside Drive site as Industrial Use in all but two figures. Figure 77 'Indicative Phasing of Housing Delivery' and Figure 138 'Indicative Phasing' show the site as an existing residential area. Diageo made representations to the 2016 version of the draft Local Plan noting that the location of Lakeside Drive appears to be drawn incorrectly as it shows the road appearing in the Origin Business Park. The OPDC consultation response notes that this has been amended in the updated version of the plan. It is understood comments were also received from Workshop and Commonplace, which set out that the First Central area lacks social infrastructure and should be more connected, and that there may be opportunity for shops to be located here to cater for local workers. The current revised draft Local Plan indicates a move towards a mixed use development on this site. Figure 3.4 'Land Use' indicates the site as mixed use area and Figure 3.16 'Development Phasing' indicates the site as coming forward for development in the next 0-5 years. The southern section of the site also sits within the Brewery Cluster as indicated in Figure 4.26. The associated Policy 4C1 'Brewery Cluster' indicates that the site should provide an active frontage which will be delivered through employment use, and that residential use will be restricted along the boundary with the SIL which starts at Origin Business Park to the east.
15	67	Agent	Mark Underwood	Deloitte LLP (on behalf of Diageo)	Places	P4		Twyford Abbey Road – Considerations for Residential Development Allocation Diageo supported the 2016 draft Local Plan's designation of the site as a potential residential development site. They are disappointed to see the removal of this site from the proposed housing delivery designation and the significant opportunity to deliver more housing than it offers through its proposed designation as open space. For the reasons below, the OPDC is requested to reconsider the designation of the site for housing and remove the open space designation, and amend the Local Plan to reflect this. When compared to the Lakeside Drive site, Diageo consider that the Twyford Abbey Road site offers a significantly stronger opportunity to deliver housing and improve placemaking in the area through a comprehensive and coherently designed scheme improving layout and design providing a high quality development and surrounding environment. Accepting that future development would need to bring forward a sensitive design given the low rise residential area to the north of Twyford Abbey Road, this site is better situated to deliver housing and would provide a higher standard of residential amenity. The site would be complementary to the existing First Central Development to the south. With careful design, it would act as a buffer to blend the newer more dense development to the south with the low rise suburban area to the north of Twyford Abbey Road. It is recognised that this site is currently designated in the Brent Local Plan as open space and contains a community area – the sports court. However, it is considered that this open space is underutilised and of poor quality. The current open space and communal provision is not of the quality or quantity that could not be sufficiently and appropriately re-provided in a new development on the site which included new high quality open and community space, and contributed to improvements to the remaining neighbouring open space, such as the adjacent Grade 1 SINC. Moreover, the First Central development already provides a significant quantum of high quality open space in the centre of the development comprising the Diageo Lake. Diageo acknowledge that development proposals would be required to re-provide play space and community space of a significantly higher quality if the site were to come forward for development.
15	68	Agent	Mark Underwood	Deloitte LLP (on behalf of Diageo)	Places	P4		Diageo would also ask the OPDC to consider the viability challenges presented with bringing forward the Lakeside Drive site as a new development. The quality of the site is poor, it is long and narrow and has a tight relationship with the industrial area adjacent to the east. This severely constrains the ability to deliver a coherent and cohesive development proposal that provides suitable active frontages alongside access, car parking, amenity space and other necessary infrastructure. The quantum of development that is deliverable is not likely to overcome the costs of implementing a development on this site and providing SME units, Live/Work and other commercial units with residential use on upper levels particularly in the context of market demand. Diageo consider that the Lakeside Drive site offers the opportunity within the same land ownership to deliver new and improved open space by re-providing the existing open space and community facilities located on the Twyford Abbey Road site. For this reason, Diageo do not support the current policy designations for either of the sites and set out their preference for the 2016 version of the Draft Local Plan.
15	74	Agent	Mark Underwood	Deloitte LLP (on behalf of Diageo)	Places	Site Allocations	Figure 4.2	Diageo request that the site allocation 27 is amended to not include the strip of land that comprises the Lakeside Drive site. This land is located on the east side of Lakeside Drive. Diageo request that a new site allocation is added to the Figure for residential development on the Twyford Abbey Road Site.
15	75	Agent	Mark Underwood	Deloitte LLP (on behalf of Diageo)	Places	P4	Figure 4.24	Diageo request that the Twyford Abbey Road site is included within the 'existing residential neighbourhood designation'.
15	76	Agent	Mark Underwood	Deloitte LLP (on behalf of Diageo)	Places	P4C1	Figure 4.26	Diageo request that the diagram is amended to show new open space provision and community facilities on the Lakeside Drive site (east of Lakeside Drive). This conforms to the objectives set out in Paragraphs PRW.13 and within Policy PC41 which supports delivery of new south/north walking and cycling routes.

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15	77	Agent	Mark Underwood	Deloitte LLP (on behalf of Diageo)	Places	P4C1	Para B.7	Diageo does not consider this site is a suitable or viable development opportunity. Diageo wish to see this paragraph omitted.
16	81	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P1	Figure 4.3	The map Fig 4.3 does not show Wormwood Scrubs Street although it is mentioned in the text under Public Realm and Movement i) i) (p 53) as part of the street network. It is however shown in fig 4.52 p 136 of Wormwood Scrubs under POLICY P12. One discovers in OOS.11 p 57: The delivery of Wormwood Scrubs Street is expected to take place after the plan period and is contingent on the redevelopment of the IEP Depot. Although outside of the plan period, development proposals should appropriately safeguard Wormwood Scrubs Street's future delivery. Then in Table 11.1 under Policy D12 there appears ...the International Express Programme IEP) depot...This Local Plan does not identify this site as likely to come forward for development in the Plan period. However, should a solution be found that facilitates redevelopment that all parties can agree on, OPDC would support the principle of mixed use development on this site." Despite the uncertainty surrounding the construction of Wormwood Scrubs Street, it would seem from the above to be impossible to ignore. There are references to it later in this Plan (and see in particular 5.16 below).
16	82	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P1; P2		As with the last Plan, no detail of pedestrian or cycling links from Old Oak South to the Scrubs is described. We understand this is because of the situation of the IEP Depot during the currency of this Plan. Table 11.1 referred to above adds: Securing access to Wormwood Scrubs would require delivery of new connections over/under this depot to connect the regeneration of Old Oak into this important metropolitan open space. But such a connection is based on the premise that it must lead directly from the Station to the Scrubs, something we challenged in our response to the last Plan, a point that is nowhere addressed in this Plan (and see 5.13 below). It is not justified in that it is not the most appropriate strategy when considered against the reasonable alternative which we identify in 3.5 and 5.13 below nor is it based on proportionate evidence. Figure 4.3 however does show a green bridge leading from Old Oak North to a point above the Scrubs to the east of the IEP depot. There is further reference to this under POLICY P2 : Old Oak North, Public realm and movement vii) supporting a new walking and cycling route via a green bridge to Wormwood Scrubs and under OON.18 p 69: Another key crossing will be the provision of a new route as a green bridge to Wormwood Scrubs to enable existing and new communities to access this open space. The green bridge is as far as we can discover an idea conceived since the last Plan and would connect with the Scrubs at one of the alternative points we suggested in our response to that Plan. We shall comment further on this under POLICY P12 below but fail to see the need for more than one route to the north of the Scrubs. We urge the study of the feasibility of a single access point at or near the point envisaged for the green bridge which would combine the bridge (from Old Oak North) with access from Old Oak South. Without such a study this aspect of Policy P1 is not justified when considered against reasonable alternatives, nor can it be effective in the context of the IEP depot. Nor do we see the need for a cycling route to the Scrubs (as opposed to Wormwood Scrubs Street) from Old Oak South, a point to which we shall return under POLICY P12.
16	83	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P1	V5	We are unclear how development will celebrate...the locally cherished Wormwood Scrubs (V5). If this means there will be no building or access that will intrude on the essential character of the Scrubs then we support it.
16	84	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P1	l) I; v); OOS 18.	We pointed out in our response to the last Plan the potential contradiction between the "sensitive edges" of the Scrubs and the highest buildings around the Station and surrounding areas. We also suggested the Hythe Road Station site as suitable for a cluster of high density development and note OON.23 p 70 refers to optimising development around Hythe Road Station, Grand Union Square and along Old Oak High Street. Old Oak's tallest buildings are considered appropriate in these locations. We repeat our observations in 2. above, in particular regarding the Views Study. Even if there is no tall building to the south of the Station, those on the north east and west will dominate the Scrubs. While we still question the need for tall buildings around the Station we also emphasise the need to "respond" to the Scrubs as MOL. Is it too much to ask (see 2.6 above) for a simple statement to the effect that there should be no tall buildings on the edge of the Scrubs? With the creation of Wormwood Scrubs Street which will border the Scrubs this means the southern edge of Old Oak. We therefore suggest adding to OOS "18: Development of tall buildings south of the Station and on the southern edge of Old Oak will be resisted." Without such an addition Policy P1 in relation to tall buildings is not justified.
16	85	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P10		We are unclear whether the two green arrows (walking and cycling routes) in Fig 4.42 p 119 show intended routes to the east of the Scrubs from Scrubs Lane as opposed to existing routes. There are at present two entrances from Scrubs Lane: one at the north eastern corner about 120 metres south of Mitre Bridge (roughly as shown in Fig 4.42) and the other just north of Mitre Way/Dalgarno Gardens and south of the pedestrian crossing and bus stop. The first is pedestrian only to join the pedestrian path running north-south within the Scrubs; the second, which used to be pedestrian only, is now part of the new Cycle Quietway and is some distance to the south of the second arrow in Fig 4.42. This joins the pedestrian path for a short distance and then turns west along the top of the car park and parade ground until it joins the old cycle path that runs south of the car park from which point it skirts Linford Christie Stadium and the prison until it joins Braybrook Street just before Old Oak Community Centre. We understand the segregated cycle lane to be the existing cycle lane in Scrubs Lane and not an intended route within the Scrubs. We note under Public realm and movement "f) ii) p 120 contributing to the delivery of a continuous 5 metre wide footpath and 4 metre wide two-way segregated cycle lane...along the west of Scrubs Lane." SL9 p 122 expands on this. However desirable such improvements might be we question how, given the existing width of Scrubs Lane, they can be achieved without encroaching onto the Scrubs. We would oppose any such encroachment.
16	86	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P10	SL.11	While there may be some room for improvement in the existing entrances to the Scrubs from Scrubs Lane, we regard these two entrance points as being in the right place, particularly now that the Cycle Quietway follows the lower point as described in 4.1. We see no need for any additional connections from Scrubs Lane and shall comment further on access to the Scrubs under POLICY P12 below. Policy P10 with regard to new walking and cycling connections to the Scrubs is not justified: it is not the most appropriate strategy, is not based on proportionate evidence, nor is it effective.

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16	87	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P12		We are concerned that, as compared with the last Plan, there is a weakening of the theme of retaining the Scrubs as an open space that is more wild than tamed; and a strengthening of the text regarding access, facilities for users and walking and cycling routes. Our fear is that this could lead to a gradual change in character to a managed park that is more tamed than wild as an attraction to the “clientèle” from the new development north of the Scrubs. Whether this is intended we do not know but it is a trend that is unwarranted by NPPF, London Plan or other policies and one we assert that should be resisted.
16	88	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P12	V1	In broad terms we agree with the VISION although have reservations about New sensitive connections to the north and east to which we shall return below. To make good the deficiency we have identified in 5.1, we suggest the opening sentence of V1 should read Wormwood Scrubs will continue to be a cherished open space, more wild than tamed, important ecological asset and a protected area of Metropolitan Open Land. Without these italicised words Policy P12 is not justified and risks inconsistency with NPPF in relation to the quality of open space.
16	89	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P12	b) WS.1 WS.7	We question the emphasis that seems to be placed on the management of the Scrubs. Under the Act, LBHF is the sole trustee of the Scrubs. The Act created a charitable trust and the Wormwood Scrubs Charitable Trust Committee, a committee of LBHF, discharges LBHF's function as trustee. While the Trust may welcome financial support from the OPDC (e.g securing appropriate resources as above), the responsibility for the management of the Scrubs is the Trust's, no one else's. Under section 3 of the Act, LBHF holds the Scrubs in trust, subject to its military use, for its “use...by the inhabitants of the metropolis for exercise and recreation”. Under section 4, the Trust is required to maintain the Scrubs “in such condition as may make the Scrubs most suitable for the trusts and purposes” under the Act. Under the same section it “may lay out... and improve the Scrubs in such manner as may be agreed upon with the (now) Secretary of State for Defence as being most expedient for the execution of this Act...” The Trust therefore is under an obligation to maintain the Scrubs for its use by the public for exercise and recreation, in furtherance of which it has the power, with the agreement of the Secretary of State, to make appropriate improvements. The conflation in WS7 of parts of sections 3 and 4 results in a statement that is not strictly accurate. Quite apart from the strict legal position, the supremacy of the Trust in relation to the management of the Scrubs was affirmed in the then Mayor's letter of 15 December 2014 at the time of the London Assembly debate on the boundary of the proposed MDC (which became the OPDC) part of which reads: I anticipate that the regeneration of Old Oak will provide opportunities for sensitive enhancements to the Scrubs, which could include drainage and access improvements. Any such proposals will be fully compliant with the Wormwood Scrubs Act, which will remain in force and will continue to control what happens at the Scrubs. The Wormwood Scrubs Charitable Trust will continue to govern the Scrubs and the Trust's express permission will be required before any works are undertaken. As such, whilst the proposed MDC would become the planning authority for the Scrubs, it would not have any direct powers to implement measures that do not have the full support of the Trust. The proposed MDC team will continue to work closely with the Trust and the local community to understand their aspirations for the future of the Scrubs. We suggest therefore that in WS1 the sentence The Scrubs...enhancements should be deleted and replaced by "Under the Wormwood Scrubs Act the Scrubs is held in trust by the London Borough of Hammersmith and Fulham for its use by the inhabitants of the metropolis for exercise and recreation. It is the sole responsibility of the Wormwood Scrubs Charitable Trust to manage the Scrubs for that purpose and its powers include the making of improvements. Hence enhancements and other proposals affecting the Scrubs will require the express permission of the Trust. It is for the Trust to decide if necessary to whom to delegate the execution of such work. " and that the sentence in WS7 "The Wormwood Scrubs Act...metropolis" should be deleted. Such an alteration to the text is needed for the delivery of Policy P12 to be justified and effective.
16	90	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P12	c) WS.2	Green Infrastructure and open spaces "c)...delivering etc iii) essential ancillary facilities for appropriate uses where they maintain the openness of Wormwood Scrubs;" We appreciate this is a statement of policy which follows the wording of the London Plan in relation to MOL, but if essential ancillary facilities for appropriate uses contemplates anything in addition to the “improvements” listed in WS2 this should be clarified "v) appropriate lighting" These are developed in WS.2 WS.2 refers to the 2016 Wormwood Scrubs Survey and the most popular improvements as being a café, toilets, litter management, lighting and security and new play equipment. There was considerable disquiet about the survey in its original form although its final format was apparently approved by the Chair of the Charitable Trust committee. As for toilets and a café we note WS.6: ... OPDC will work with the Charitable Trust, LBHF and local communities to appropriately secure these and other potential enhancements subject to these maintaining its openness and according with its various designations. We commend to the OPDC the initiative of Martin Murphy and supporters in reviving (with the approval of the Charitable Trust) a café near the entrance to the Linford Christie Stadium. We are unclear as to what form of lighting or CCTV would be practicable on the Scrubs and in keeping with its wild nature.
16	91	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P12	d)	"d) Protecting Wormwood Scrubs as Metropolitan Open Land (MOL) by ensuring proposals accord with policy EU1 and with the London Plan." We strongly support this policy. EU1 p 161 states that developments will be supported "which give MOL including Wormwood Scrubs the strongest protection. Proposals that result in loss or harm (including the erosion in the quality) of MOL will only be permitted in very special circumstances and where at least an equivalent quantum and quality of open space is provided." While this statement is a partial reiteration of the London Plan, as mentioned in 1.4 above, we cannot conceive of circumstances justifying loss of any part of the Scrubs. We also endorse SUPPORTING TEXT 6.9: The priority first and foremost is to protect MOL.
16	92	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P12	g)	We comment on specific routes below but query across the Scrubs (see below). We see no reason for new walking routes across the Scrubs, if the Scrubs is to continue to be enjoyed in anything like its present form in accordance with the VISION of the Scrubs as a cherished open space, important ecological asset and a protected area of MOL. As for cycling routes (as we pointed out in our comments on the last Plan),

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								the Scrubs is not cycle-friendly and we can see no need for this to change. There are – or will be – adequate cycling routes surrounding the Scrubs to enable cyclists to reach points on all sides of the Scrubs (and see below).
16	93	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P12	WS.7	We make the following general comment. There is a clear conflict between retaining the Scrubs as an open space that is more wild than tamed and the risk of encouraging visitors in such numbers as to destroy its character. This was recognised in the last Plan (P10,4.163 Retaining Wormwood Scrubs as a public open space that is more wild than tamed will inform how the regeneration of Old Oak relates to the Scrubs. Given the scale of development planned in Old oak...there is a need to consider the potential impacts on Wormwood Scrubs of these new users) but seems to have been given little attention in this Plan. Under the Act it is a place to be used by the public for exercise and recreation; it fulfils the requirements of a Metropolitan and District Park by providing (among other things) ecological landscape and outdoor sports facilities, playing fields and children's play. Access to these facilities should be available to all who want them, but this should not mean access increased to the extent that it diminishes the users' enjoyment of those facilities or destroys the character of the Scrubs. P12 abounds with references to sensitive connections, sensitive walking and cycling routes, sensitive enhancements but provides little reassurance as to how such sensitivity will be achieved. We comment on access being restricted by railways in the north in 5.13 below and on vegetation and poor quality walking and cycling routes in 5.17 and 5.18 below. We have commented on the statement concerning the Act in 5.4 above.
16	94	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P12	WS.8	We are uncertain whether the reference to "connecting communities to...surrounding destinations" envisages routes across the open space as a means of getting to and from places on opposite sides of the Scrubs: if it does, we are opposed to such a plan. What has to borne in mind is that access is to enable people to use the Scrubs (in accordance with the Act) for exercise and recreation, not as a substitute for a route from A to B. The sentence in WS.8 "New and enhanced access should be provided from all areas round the Scrubs and to be of sufficient capacity to enable people to reach their destinations" is not justified.
16	95	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P12	WS.8	It is obvious that the existing railway network prevents any direct access to the north: the existing communities to the north are well north of Old Oak Common in Willesden and Kensal Green. We have consistently accepted that with the regeneration of Old Oak there will have to be access to the north of the Scrubs but maintain that there is no need for such access direct from the Station (and see 3.4 above). From Figure 4.52 (and Figurer 4.3 and 4.8) it appears that no less than three connections are envisaged from the Station and surrounds. We continue to maintain that potential users of the Scrubs (residents and workers) will come predominantly from the area north east of the station. There is no reason why the Green Bridge shown in Figure 4.52 should serve only users from Old Oak North: it could equally provide an access point for others from Old Oak South (including the Station). Again, as previously pointed out, we fail to understand why it seems to be assumed that travellers from Birmingham to London will want access to the Scrubs (to walk to East Acton underground station?) when there will be links to central London via Crossrail, London Overground and Underground (from North Acton). We contend that the single access point will provide sufficient capacity to enable people to reach the Scrubs from the north in accordance with WS8, and the OPDC should regard this as adequate consistently with their claim in WS4 that the Scrubs should be conserved and sensitively enhanced so that it may successfully respond to the impacts resulting from the opening of the Station and the wider regeneration of Old Oak. Our contention is reinforced by the reference in WS4 to the conservation of the biodiversity designations...that give the Scrubs a sense of wildness (the only reference in this Plan that we can find to this unique aspect of the Scrubs): and see 5.14 below.
16	96	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P12	WS.8	Table 11.1 p 265 concerning the IEP depot to which we have referred in 3.1 and 3.4 includes Securing access to Wormwood Scrubs would require the delivery of new connections over and/or under this depot to connect the regeneration of Old Oak into this important metropolitan open space. We are unclear whether this is a revival of the idea of an underpass which was mentioned in the OAPF but omitted from the last Plan, but wish to reiterate we are opposed to any form of underpass into the Scrubs. We are also unclear whether such a connection (over or under) is envisaged during the lifetime of the depot and – if so - how this fits with the statement that this Plan does not identify this site as likely to come forward in the Plan period. We have given our reasons above as to why we consider access at this point is unnecessary and inconsistent with the sensitive enhancement which this Plan claims to support. For the above reasons, routes direct from the Station to the Scrubs are not justified when considered against the reasonable alternative to which we have referred, nor would they be effective. There is no need for a cycling route to the north of the Scrubs (as opposed to Wormwood Scrubs Street – see 5.10 above and 5.19 below). Such a route is not justified (see above).
16	97	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P12	WS.8	An aspect of the northern boundary which is missing from this Plan as it was from the last Plan is the embankment. We commented on this omission by reference to the GLA's responses to comments on the OAPF: "The GLA understands that OPDC is producing a 3D masterplan of the Old Oak area and as part of this consideration would be given to the retention of the embankment". The embankment is part of the Scrubs LNR. WS4 includes: The Scrubs also has a number of biodiversity designations reflecting its diverse range of habitats that give the Scrubs a sense of wildness...In accordance with policy EU2 these designations (LNR and SINC) will be continued to be conserved and enhanced so that there is no net loss. The Friends regard the retention of the embankment as vital to the ecology of the Scrubs, supporting as it does a variety of breeding migrant birds as well as resident species. But it is also essential as a natural shield from Old Oak if the character of the Scrubs and its sense of wildness is to be protected in accordance with the VISION of the Scrubs as a cherished public open space. The need for such a shield is that much greater in the light of the proposed Wormwood Scrubs Street along the top of the Scrubs. We should add we are unclear as to the precise proposed course of Wormwood Scrubs Street, given the existence of railway lines to the immediate north of the Scrubs, quite apart from the IEP depot. We would vigorously oppose any incursion into the Scrubs by Wormwood Scrubs Street. Connections i) states: Supporting the character of Wormwood Scrubs by ensuring the proposed Wormwood Scrubs Street to the north of Wormwood Scrubs relates sensitively to the open space. We suggest at the end of this sentence and there is no incursion into Wormwood Scrubs and at the end of WS4: The embankment along the northern edge of the Scrubs should be retained. The italicised words are needed for Policy P12 to be justified and effective.

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16	98	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P12	WS.8	WS8 (cont'd) "• from Scrubs Lane via new and improved...points of access • from Scrubs Lane along a cycling Quietway located on the southern edge of the Scrubs" We note also WS7 states Walking and cycling access...is currently restricted by...vegetation and poor quality walking and cycling routes in the east and west. We have commented in 4. above on the entrances to the Scrubs from Scrubs Lane and the room for possible improvement but see no need for additional access. The Friends do not accept that vegetation impedes the progress of people entering or leaving the Scrubs at these points or that they are routes of poor quality and would be against a reduction of the woodland. The Cycle Quietway creates a new cycle path on the east of the Scrubs south of Mitre Way/Dalgarno Gardens where previously there was none (rather than poor quality), although cyclists did use the old pedestrian path. For these reasons and those given in paragraph 4. above the proposed routes from Scrubs Lane are not justified or effective.
16	99	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P12	WS.8	WS8 (cont'd) "• from Old Oak Common Lane via a widened footpath and segregated cycling lane" We take these to be references to a footpath and cycle lane in Old Oak Common Lane. We are unpersuaded of the need for a new entrance to the Scrubs from Old Oak Common Lane although the western edge could be improved by the removal of the asphalt. We consider the walking routes on the west of the Scrubs are sufficient for users who wish to enjoy the benefits of the Scrubs as opposed to a route across it. Consistent with our view that there should be no cycle path on the Scrubs, we oppose a cycling route into the Scrubs from Old Oak Common Lane. Such a route is not justified.
16	100	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P12	WS.8	WS8 (cont'd) • from Wormwood Scrubs Street running parallel to the northern boundary of the Scrubs We are unclear whether this means (a) access from Wormwood Scrubs Street to a foot and cycle path running parallel to the boundary of the Scrubs outside the boundary, or (b) one running parallel with the boundary inside the boundary. If (a) then we are content: it would provide a useful link between Old Oak Common Lane and Scrubs Lane. If (b), we are opposed for reasons already given concerning the conservation of the Scrubs as a place for exercise and recreation rather than as a route from A to B. A route such as (b) is not justified.
16	101	Community Group	Stewart Dalby	The Friends of Wormwood Scrubs	Places	P12	WS.4	5.20 With regard to the legal protection of the Scrubs, we would add in WS4 after Commons Act (2006), "the Ministry of Housing and Local Government Provisional Order Confirmation (Greater London Parks and Open Spaces) Act 1967. "
17	103	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Places	P3	Design	Careful consideration of appearance, layout, scale and massing, amongst other design considerations, will be needed to ensure that the regeneration of Old Oak and Park Royal makes the most of the Grand Union Canal as an important piece of public realm. We welcome the support throughout the plan for active and positive frontages and the support for natural surveillance, which will be a key part of this. Whilst detailed consideration will need to be given to the impacts of such development during master planning and the development management process (such as the risk of them spilling out onto the towpath and impeding users), the Trust supports the intention to focus active A3 and A4 uses onto the canalside adjacent to Old Oak High Street. There may be other opportunities to do this identified through the masterplanning.
17	104	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Places	P3	Crossin gs	In Policy P3 and throughout the plan, it is stated that, within Old Oak, heights of "generally 6 to 8 storeys fronting directly onto the Grand Union Canal" will be acceptable, with opportunities for tall buildings at key crossing points. We are concerned that uniform 6 to 8 storey development along the canal will create a canyoning effect, which will have a detrimental impact on the quality of the canal environment and its users. We note that table 5.1 of the local plan sets out benchmarks for amenity that the OPDC will require new development to comply with under policy D6. Whilst we note that it is a national benchmark established by BRE, we would suggest that a standard of 2 hours of sunlight on 21 March over half the area is not a particularly high aspiration for such a significant asset to the area as the Grand Union Canal. We would question whether this meets the requirement in NPPF paragraph 64 for development to take opportunities to improve the character and quality of the area.
17	105	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Places	P3	Crossin gs	Whilst the Trust is not, in principle, opposed to buildings taller than 6 to 8 storeys near to the canal, we would question whether the best place for them is at key crossing points, especially on the south side of the canal. This is likely to increase the overshadowing of bridges and make it more difficult to create high quality environments around them.
17	106	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Places	P3	Crossin gs	At present policy P3 appears to suggest that the OPDC has fully considered the impact on heritage, character, biodiversity and amenity and determined that the proposed heights are acceptable. We would suggest that the policy is amended so that it is clear that the consideration of building heights will take account of these matters when properly assessed as part of the masterplanning and development management process. In addition, we suggest that the waterway's functional role is considered, in accordance with the need to consider the impact on navigation in London Plan policy 7.7. In general, we would suggest that this approach is taken when assessing the appropriateness of building heights at Old Oak South (policy P1), Old Oak North (P2) and Scrubs Lane (in policy P10), although we note that development on the south side of the canal at Scrubs Lane is currently heavily constrained by road and rail infrastructure.
17	107	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Places	P3	Crossin gs	We understand that the Local Plan includes proposals for 4 road crossings and 1 pedestrian / cycling crossing. We appreciate that this area will change dramatically as a result of the proposed new development and that better connectivity across the canal in a north-south direction will be required. We have no in principle planning objections to the provision of the identified new crossings of the canal. We note that Policy P2 suggests that these crossings could be over or under the canal. New crossings of the Trust's waterway will require our agreement, including the payment of a premium in accordance with the Charities Act 2011. The consent of the Secretary of State for Environment, Food and Rural Affairs will also be required. The Trust will want to be satisfied that suitable ownership, management and maintenance arrangements are in place for new bridge structures. It is the Trust's strong preference not to become the eventual owner of any bridge crossings of the navigation. We welcome the OPDC's intention, expressed in Policy P3, to work 'positively with stakeholders to deliver high quality new and enhanced bridges'. In the 2nd

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								bullet point of the section on Policy P3 in table 11.1 (p265), reference is made to the delivery of bridges requiring the agreement of the Trust and landowners on either side. We would suggest that the agreement of the highway authority should be added to this, as they are the most likely organisation to take on long term responsibility. Developers of new bridge crossings will need to work in accordance with our Code of Practice to secure our approval, as they will for any other works that could affect the Trust's property.
17	108	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Places	P3	Crossings	Bridges can lead to areas of poor quality public realm on the Blue Ribbon Network, both underneath and alongside. The Trust will want to be satisfied that the design of the proposed bridges is acceptable and appropriate to the character of the waterway. Policy P3 provides support for bridges that are high quality, support local character, integrated into the built environment and accessible. We suggest that it would be beneficial for the OPDC and the Trust (and other parties through appropriate consultation) to take these points further and agree design principles for new bridges within the OPDC area. We would suggest that amongst the issues that this should cover are the height/clearance provided, the angle of the bridge, the location of the abutments, the means of access to the towpath from the bridge, the quality and natural surveillance of spaces alongside them, materials and detailing. The Trust has prepared a publication on design principles for HS2 crossings of our network (available in two parts: https://canalrivertrust.org.uk/media/library/6524.pdf and https://canalrivertrust.org.uk/media/library/6525.pdf). Whilst the type of infrastructure will be different in Old Oak, this may provide a useful starting point for establishing bridge design principles in the OPDC area. We suggest that a reference should be made to producing this guidance in the supporting text to Policy P3.
17	109	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Places	P3	Crossings	Whilst we have no objection to the principle of new bridges across the canal, we are yet to be convinced by the case for a crossing within the Channel Gate area, a short distance to the north-west of Old Oak Lane. We are happy to discuss this matter further with the OPDC and have no objection to its inclusion within the plan, given that the plan recognises the need to agree the delivery of crossings with the Trust.
17	110	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Places	P3	Crossings	There may be opportunities to re-use the Brunel Bridge from Paddington within the development of the Old Oak area in a way that reflects the waterway and railway heritage of this area. English Heritage, who are the custodians of the remaining elements of the structure, may be able to advise further on this.
17	111	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Places	P3	c) GUC.5	We welcome the support for a range of permanent and temporary new moorings. We consider that moorings can help to ensure that there is life and activity on the waterway, enhancing it as a destination, providing new opportunities for people to live, work and visit and providing natural surveillance over the surrounding land. Paragraph GUC.5 goes further than Policy P3 (c) by providing support for educational, cultural and commercial moorings, as well as the residential, leisure and visitor moorings referred to in Policy P3. We suggest that Policy P3 is amended to reflect the wording in GUC.5 so that planning policy support is provided to a wider range of moorings, creating a diverse and vibrant waterway. We consider that this will be of benefit to decision makers considering planning applications as it is often considered to be the case that, unlike most leisure and visitor moorings, permanent educational, cultural and commercial moorings would require planning permission. We believe that there could be benefits in new moorings throughout the Old Oak and Park Royal areas. As an example, we would suggest that new permanent residential or leisure moorings in Park Royal may help to provide new forms of natural surveillance over the waterway corridor in areas where development "turns its back" on the canal. We question, therefore, whether it is justified as the most appropriate strategy for part (c) of Policy P3 to support "moorings and their supporting infrastructure... along the canal and specifically in areas of higher activity...". We would suggest that this is re-worded to state "including in areas of higher activity". There are detailed issues that the Trust would need to consider when assessing applications to deliver new moorings on or connecting to our waterspace in the OPDC area. These include, ensuring that the provision would not adversely affect other users of the waterway, such as through restricting the ability to navigate it, and that it would not have an adverse impact on water resources. We would suggest that these are also planning matters. We suggest that additional points should be added to policy P3 (possibly in the 'infrastructure' section) to make it clear how the existing waterway will be protected during the life of the plan. Whilst there may be opportunities for creating new waterspaces in the OPDC area, there will also be issues that the Trust will need to consider in determining whether it is acceptable for these to connect to our existing infrastructure. As with the provision of moorings, this would include the impact on water resources and any impacts on other waterway users. Again we would suggest that these are planning matters and that the change that we have suggested above should be made to ensure that these are issues are clearly identified to the applicant and decision maker. Any application to create new waterspace connecting to our waterway will require the Trust's permission, following consideration through our new marinas process.
17	112	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Places	P3		The Trust believes that the canal towpath should be properly integrated into the masterplanning of the regeneration of this area and its movement strategy. We welcome the fact that p196 and p198 recognise it as a key part of the walking and cycling network and that its role as a Quietway is properly reflected. As noted above, we support many of the design principles set out in policy P3, which should assist in providing natural surveillance and a better sense of safety. We welcome that the Infrastructure Delivery Plan includes 'improvements to the towpath along the south of the Grand Union Canal'. We are concerned, however, at the proposal for the towpath to deliver a 2-way cycling route of a minimum 3.5 metres in width where feasible. As well as doubting how deliverable this is, we believe that this would dramatically change the character of the towpath as a shared route and create hazards and tensions where the towpath narrows significantly, as it would clearly need to as it runs along the railway lines to east of the OPDC area or passes under existing bridges. We suggest that this proposal would not be consistent with the agreed standard for the Grand Union Canal Quietway or the London Cycle Design Standards, which recognise the shared nature of canal towpaths and the importance of margins, grassed verges and paved areas alongside the towpath. We suggest that instead of providing support for widening the towpath itself, the focus should be on recognising its value as a shared-use Quietway and supplementing it with additional east-west pedestrian and cycle routes. This could take the form of an additional route on the

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								south side of the canal within the proposed canal linear park, subject to this not having an adverse impact on the integration and natural surveillance of the existing towpath.
17	113	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Places	P3		We have suggested above that a new section should be added to policy P3 to protect the waterway from adverse impacts resulting from new development. As well as those issues identified above, we ask that this includes the protection of the structural integrity of the canal and the land stability of the adjacent land, consistent with paragraph 109 of the NPPF. The structural integrity of the canal is a sensitive issue in this location because of the length of the pound (the distance between locks), the amount of water it contains and the level differences that exist across the Old Oak area. The proposed additional policy requirement may result in a need for developers to submit land stability assessments or surveys of, and improvements to, sections of the waterway walls when undertaking development in close proximity to the canal.
17	114	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Places	P3		The Trust generally welcomes the intention to create a linear local park along the line of the Grand Union Canal and the protection and enhancement of its biodiversity value. We would like to see more consideration given at the masterplanning stage to how this will link with other areas of open and green space. We suggest that the delivery of the linear park should not undermine natural surveillance in Park Royal, in particular, and that this will need to be considered at the detailed design stage. We are content that policy P3 provides sufficient comfort that this will be taken into account. We welcome that policy P3 recognises that lighting along the towpath will need to be at appropriate levels and types. Inappropriate light levels and light spill along the canal corridor can have an adverse impact on its use by foraging bats. In order to protect the biodiversity value of the canal corridor, we suggest that this should be the case for the whole of the canal-side public realm and not just the towpath. We would suggest that part (h)(ii) of policy P3 becomes a new part (j) to provide this level of protection.
17	115	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Places	P3		New development in the Old Oak and Park Royal areas will lead to new expectations for the quality of the environment of the canal corridor. The Trust is of the view that where these expectations exceed its current management standards for matters such as litter picking and vegetation management, it is reasonable (and in their interests and the interests of their residents, workforce or visitors) for developers to meet these expectations. There are different models for how this could be achieved, including through CIL, local adoptions or bespoke agreements with developers. We have experience of this on other developments (such as Kings Cross) and can provide more detail on these as the development progresses towards the canal-side phases. We suggest that, consistent with policy EU1, reference is made at the end of the “green infrastructure and the environment section” to the need for appropriate support for long-term management and maintenance of the canal linear park. In the same way that we would expect that the industrial land proposed for regeneration will need to be treated to ensure that it is fit for the residential, business and leisure uses proposed, we anticipate that the canal environment may need to be improved, including through dredging, to ensure that it is able to become the place that the OPDC’s vision intends. We consider that Policy P3 (m) provides support for this. We suggest that it should be considered as part of the infrastructure planning for the area. In addition, we suggest that the Local Plan should include support for information / interpretation signage that aids understanding of the canal’s cultural, environmental and/or movement functions.
17	116	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Places	P3		Where it is appropriate to do so, we welcome the support for waterborne freight transport during the construction and operation of development. We question whether the plan could go further by requiring developments adjacent to the canal above a certain threshold (those referable to the Mayor, for example) to submit a feasibility assessment that considers the opportunity to use waterborne freight in this way.
17	123	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Places	Site allocations	Figure 4.2	On a presentational point – we note that the line of the Grand Union Canal is in the wrong point on figure 4.2 (p51)
19	138	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Places	P3		We welcome the designation of the Grand Union Canal as a separate identifiable OPDC area (P3).
19	139	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Places	P2	f,i	We do not believe that construction of an initial phase of Old Oak High Street truncated by the canal and the Crossrail Depot will encourage early activation of the Old Oak North Area (Policy P2f.i) by supporting ‘active meanwhile uses’. The term ‘meanwhile’ is used frequently in the Local Plan supporting text and it suggests that the OPDC planning team recognise that many of the aspirations for the area are unachievable in the short term.
19	140	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Places	P2	n,iii	The Policy (P2 n.iii) proposing delivery of ‘heights of generally 6 to 8 storeys fronting directly onto the Grand Union Canal’ is likely to produce a tightly enclosed corridor setting along the canal completely at odds with other policies seeking to deliver a high quality local park along the Grand Union Canal (Policy P2j.ii) and enhancement of the Grand Union Canal Conservation Area (policy P2m.i).
19	141	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Places	P2	q) i. ii.	We note and support the policy (P2q.i and ii) to make use of the Old Oak Sidings for continued use for waste management and the possible enabling of an energy from waste facility. However figure 4.12 shows a new walking and cycling route on the north bank of the canal at the Old Oak sidings site. This route will preclude the use of the existing canal wharf for movement of waste to the site by water freight in connection with these continued and potential uses and therefore conflicts with the objectives of Policy SP7 and supporting text 3.76 as well as Policy EU6.
19	142	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Places	P2	OON.10	The supporting text (OON.10) to Policy P2 describes the proposal to introduce town centre uses focused at Grand Union Square and at crossings of major routes across the Grand Union Canal. Whilst we would support some leisure, eating and drinking uses at these points we consider the size and disposition of these should be restricted so that the overall objective of creating public park along the canal for recreational use and as a walking and cycling route is realised.

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19	143	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Places	P2	OON.24 ; GUS.24	We strongly disagree with the view expressed in supporting text OON.24 and GUS.8 that along the canal there will be possibilities for tall buildings at key crossings to support local legibility where streets cross the canal. The need for wayfinding legibility is questionable and we consider that well designed new bridges over the canal at the proposed Park Road and Grand Union Street crossings will be sufficient in themselves to provide a sufficient sense of place. The proposed policy raises the prospect of isolated towers along the canal that will destroy the canal/park setting and have a serious impact on the microclimate of the park. In particular we are concerned that the impact that wind eddies from tower blocks would have on users of the linear park and for canal navigation. An example of this is the recently approved tower at 115 Scrubs Lane that will have a disastrous impact on the setting of the Kensal Green Cemetery Grade 1 Listed Historic Park and the Grand Union Canal Conservation Area.
19	144	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Places	P2C1	a.ii; GUS.2	Policy P2C1a.ii proposes delivering new residential, leisure, commercial, casual and visitor moorings on the Grand Union Canal. Although the supporting text (GUS.2) states that 'new moorings should be delivered in agreement with the Canal and River Trust and local mooring associations' the Local Plan fails to provide any information as to what is actually proposed in terms of facilities for canal boaters.
19	145	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Places	P2C1	GUS.5	Supporting text to Policy P2C1 (GUS.5) illustrates that the proposed crossing of the Birchwood Nature Reserve and the Grand Union Canal is recognised by the OPDC as a significant problem in terms of gradients and the relationship to the canal. We note that the CGI view of the canal crossing at this point included in the 2016 First Draft Local Plan (Figure 36 showing Grand Union Square) is not included in the current illustrative material. Figure 36 from the earlier Local Plan shows a rather misrepresentative glass bridge (without any vehicles) soaring over the canal and nature reserve.
19	146	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Places	P3	V2	We welcome the vision (V.2) for the use of the canal towpath for high quality walking and cycling routes and promotion of the canal for passenger and freight transport while seeing new and improved moorings and enhancements to its ecology.
19	147	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Places	P3	GUC.13	We also note the aspiration to provide new multifunctional water spaces will bring the character of the canal into surrounding locations while providing spaces for new moorings, access to nature and sustainable drainage. However, we note that the supporting text and figures fail to provide any details of where or how these facilities are to be planned along the canal. Supporting text GU.13 describes the opportunity for new water space in the form of basins and/or widening of the existing canal. It is disappointing that OPDC have not shown suitable sites for basins or widening in the Local Plan. Unless such sites are identified and the use safeguarded it is highly unlikely that the opportunity for new water space to enhance the canal will ever be realised at individual development sites.
19	148	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Places	P3	Figure 4.3	Policy P3 illustrates two precedent illustrations for the Grand Union Local Park (Figures 4.22 and 4.23). Figure 4.22 showing the Queen Elizabeth Olympic Park shows an attractive canal/parkland setting but it is revealing that the buildings are set well back from the River Lea Navigation which itself is much wider than the Grand Union at Old Oak. Figure 4.23 showing the Chicago Riverwalk is an entirely inappropriate precedent for the canal at Old Oak or Park Royal. The scale of the buildings and canalside spaces shown may be suited to the waterspace of the Chicago River (river width generally in the order of 60 to 70 metres) but they are completely inapplicable to the Grand Union in Old Oak, which has a width in the order of no more than 20 metres.
19	149	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Places	P4	PRW.13	Supporting text at PRW.13 suggests that opportunities must also be taken to provide new open spaces along the Grand Union Canal, within the Brewery Cluster and First Central Site Allocation. Figure 4.24 however, does not identify any of these potential publically accessible spaces along the canal and we have the impression that the Local Plan lacks the aspiration to make better use of the canal in Park Royal. We agree with the view contained in the OPDC Grand Union Canal Massing and Enclosure Note that the width of the canal itself should not be altered. What we do suggest is that the Local Plan should prioritize the creation of a broad park though the entire OPDC development area including Park Royal West, with at least 10 metres of open space on both sides of the canal. Clearly, the existing pattern of ownership and use on the northern side of the canal will restrict the short term realization of this goal, but the medium and long term benefits will surely be worthwhile – both to the users of the canal corridor and the wider community.
20	155	Agent	Adam Kindred	CBRE (on behalf of Remavon)	Places	Site Allocations	6	Remavon support the identification of the Tea Crate site as a potential redevelopment site during the plan period and the identification of a residential development to the south of the canal to the east of Scrubs Lane. In the context of OPDC's ambitious plans to deliver at least 22,350 additional homes between 2018 – 2038, we endorse the approach of the OPDC to express the site allocations as minimums to allow for the development management process to inform the total quantum of development achievable on the site. Whilst supportive of the principle of the expression of minimums, the current assumptions of 100 dwellings on the site does not accurately reflect the development potential of the site and we suggest that this is revised to a minimum of 150 to more accurately reflect the potential of the site.
20	156	Agent	Adam Kindred	CBRE (on behalf of Remavon)	Places	Site Allocations	6	It is important that this approach contains the flexibility for taller buildings 10 storeys+ to be considered outside of cluster locations where they are supported by a clear design rationale. As a gateway location into the wider OPDC development and a site identified for early delivery, it is important that flexibility remains in terms of how building heights are progressed on site so as to not unnecessarily preclude the development potential of sites being realised. Furthermore, with the context being established for height in the cluster developments to the north of the Grand Union Canal, the provision of taller buildings at a gateway location is considered as a positive design response and will help in signifying a step change in the development heights to the north of the canal.
20	157	Agent	Adam Kindred	CBRE (on behalf of Remavon)	Places	Site Allocations	6	As a gateway location, 151 Scrubs Lane will be immediately noticed by the majority of visitors to the OPDC development area. A taller building in this strategically important location will be a definitive element of the comprehensive development and will announce to all visitors the gateway to the development. A taller building in this location will assist in providing legibility through the site, and contextually would create and important step change into the development that responds well to the significantly taller buildings that have been progressed and approved north of the Grand Union Canal.

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20	158	Agent	Adam Kindred	CBRE (on behalf of Remavon)	Places	Site Allocations	6	Within the Draft OPDC Plan it is clear that Scrubs Lane is identified as an area where early development opportunities will be sought in order to maximise early delivery and housing completions. Within Policy SP10 and as supported by Figure 3.16 the Tea Crate site is identified for delivery within the first five years of the plan. In seeking to encourage the early delivery of sites it is important that sufficient flexibility and pragmatism is imbedded into the Draft OPDC Plan to make allowances for the challenges in seeking to delivery sites early within this major regeneration area. The area will undergo much change over the duration of the plan period and it is important that policies are consciously drafted with this in mind. By way of example, during what will be a period of significant change and construction there will likely be commercial challenges in facilitating early occupation of larger, family sized units (against the policy requirement in H3 for provision at least 25% 3 bed+). Accordingly, whilst appreciative of the need for developments to provide a mix of unit types, this needs to be balanced against real world market expectations for the likely occupants of new build homes during the earlier parts of the plan period when the necessary local infrastructure (i.e. schools, nursery, shopping, healthcare) may not be in place to support family units. This is particularly the case at 151 Scrubs Lane with the North Pole Depot not anticipated to be delivered until post 2030.
20	159	Agent	Adam Kindred	CBRE (on behalf of Remavon)	Places	Site Allocations	6	Further to this, we note that the site allocation includes 1,100 sqm of commercial floorspace (including a range of A and B-Classes) over the plan period. During the early years of the plan period whilst transport connectivity and retail catchments are in their infancy it is anticipated that it will be challenging to attract suitable retailers and commercial occupiers to the space. This is particularly the case with 151 Scrubs Lane which is located on the edge of the OPDC area and poorly served by public transport.
20	160	Agent	Adam Kindred	CBRE (on behalf of Remavon)	Places	P10	SL.3	On Page 121 of the Draft Local Plan the challenges are acknowledged by OPDC, as stated: ‘The early delivery of development along Scrubs Lane presents a number of challenges in the delivering successful place making and sustainable communities. These include providing uses and services to support the emerging community while the wider area of Old Oak will continue to be developed.’ Ahead of the submission draft being developed we would encourage further recognition in policy for the potential need for flexibility in the planning policy position in seeking to bring forward early development sites. This approach would also be consistent with Paragraph 14 of the NPPF which states that ‘Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.’
20	161	Agent	Adam Kindred	CBRE (on behalf of Remavon)	Places	Site Allocations	6	We are encouraged to see the encouragement within the Draft Local Plan for the role that the build to rent sector can play within the OPDC area. We consider that PRS will have a particularly important role to play in early developments within the area with the PRS ‘community’ tending to be more willing to establish themselves in areas where major regeneration and change is occurring. Whilst supportive of the principle for PRS, it is important that through the site allocations process the plan does not thwart the ability for PRS to be developed, particularly for those sites intended for delivery within the early years of the plan. The dynamics of PRS are sensitive, typically requiring 200 – 250 units to make delivery viable. Accordingly, there is an important link between the development quantum on site and the ability to attract PRS developers to Old Oak. As a potential early development site, 151 Scrubs Lane could be well suited to delivery PRS, however, at present this is constrained by the site allocations conservative approach to establishing a site minimum of only 100 units.
20	162	Agent	Adam Kindred	CBRE (on behalf of Remavon)	Places	P10		We are supportive of the vision for Scrubs Lane as ‘a characterful and well connected street sitting as a hinge between east and west helping to integrate Old Oak with surrounding areas. Development will continue its employment heritage and will integrate space for living, creating and working.’ Whilst supportive of the overall principle we would encourage further flexibility in the approach that currently seeks to locate housing above the ground floor of Scrubs Lane. Rather than a blanket approach we consider that it would be more appropriate for this to be considered in relation to individual sites.
21	164	Agent	Jeremy Evershed MRTPI	Montagu Evans (on behalf of Boropex Holdings Limited)	Places	Site Allocations		The revised Draft Local Plan identifies our client’s site within the ‘P10 Scrubs Lane’ policy chapter and more specifically in the ‘P10C4 Mitre Canalside Cluster’ designation. We initially note however that the site has not been identified as a “Site Allocation” within paragraph 4.7 of the proposed Local Plan on the basis that it is not considered a site which will make a “significant contribution” of over 100 homes. As you know Squire and Partners Architects have been working on potential massing options for the site and we can confirm that the options that have been discussed with officers at the preapplication meetings achieve in excess of 100 units (circa 120 units). We would therefore support the site’s inclusion as a site allocation within the Local Plan. It is in our view important that the site’s potential to make a significant contribution to providing new homes is recognised by the Local Plan as well as its ability to enable the significant transformation of the area in townscape and amenity terms.
21	165	Agent	Jeremy Evershed MRTPI	Montagu Evans (on behalf of Boropex Holdings Limited)	Places	P10	f)iii and iv	Our client does not, however, agree with the drafting of part f) (iii) and (iv) of the draft policy, which states that development should contribute “to and/or enable the delivery of improved connectivity by: iii. contributing to the delivery of an improved footpath, with widening where possible, along the east of Scrubs Lane; iv. improving existing and creating new east – west routes at each cluster and along Wormwood Scrubs Street that provide access to Old Oak North, Old Oak South, the Grand Union Canal and St. Mary’s Cemetery” The draft policy seeks “where possible” the giving over of potential development land to the creation of new or improved routes connecting a range of places without reference to the identified overall objectives for new/improved pedestrian and cycle connectivity and without acknowledgement of other competing individual site objectives. There will inevitably be locations where it is perfectly possible to widen footways but the benefits of doing so need to be weighed against other potential opportunities that may be lost as a result. Our client is particularly concerned that such a general policy statement could be applied to their site with the result of reducing the potential to achieve a desirable and practical development of the site. As discussed during previous pre-application meetings, the site is capable of incorporating an area of public open space, however,

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								cumulatively, this combined with additional routes and potential setbacks could detrimentally impact the ability for the site to deliver a satisfactory development.
21	166	Agent	Jeremy Evershed MRTPI	Montagu Evans (on behalf of Boropex Holdings Limited)	Places	P10	f) iv	We also question whether the policy objective to improve connectivity would be achieved by part f) (iv), as there is no further permeable route to the east of our client's site and thus any canal path would simple come to a 'dead end' at the eastern end of the site. The Grand Union Canal towpath is located on the south bank and identified as the key route elsewhere in the draft plan. The Kensal Canalside Opportunity Area to the east does not identify a new route on the north side of the canal. The policy wording should therefore be clear that the intention is not to create a new east – west route on the northern side of the canal in this location.
21	167	Agent	Jeremy Evershed MRTPI	Montagu Evans (on behalf of Boropex Holdings Limited)	Places	P10	g)	We agree with the drafting of part g) which states development should deliver a high quality, well-connected, network of multifunctional open spaces, subject to the proposed amendments to part j) and Policy P10C4 set out below.
21	168	Agent	Jeremy Evershed MRTPI	Montagu Evans (on behalf of Boropex Holdings Limited)	Places	P10	i)	Our client agrees with the objectives and current wording of this section of the policy.
21	169	Agent	Jeremy Evershed MRTPI	Montagu Evans (on behalf of Boropex Holdings Limited)	Places	P10	j)	We agree with the aims and objectives of part j), however the drafting of the policy is too prescriptive and does not allow for the achievement of different heights based on detailed site analysis and high quality architectural and urban design. Operated strictly, this policy would be an unreasonable and disproportionate constraint on development contrary to other development plan policies, including London Plan policy 7.7. We note that extant consents to the north (115-129 Scrubs Lane) and west (Mitre Yard) of our client's site (ref: 16/0119/FULOPDC and 17/0055/FUMOPDC) permit development of maximum heights of 22 and 19 storeys respectively which already therefore contradict this policy drafting. These consents in themselves reinforce our client's view that the concept of a "single tall building in each cluster" is an inappropriate approach to development constraints where an underlying imperative must be to make best use of these areas of previously developed land and optimise the density of development on individual sites in line with the London Plan. We therefore request that part 'j) v)' of this draft policy is deleted and replaced with a criteria based approach to tall buildings.
21	170	Agent	Jeremy Evershed MRTPI	Montagu Evans (on behalf of Boropex Holdings Limited)	Places	P10C4	V1	Our client supports the 'Vision' for Mitre Canalside Cluster, although we consider for clarity there should be included an explicit reference to 'residential uses' to support the principle of mixed-use development identified within Policy P10.
21	171	Agent	Jeremy Evershed MRTPI	Montagu Evans (on behalf of Boropex Holdings Limited)	Places	P10C4	Figure 4.49	Our client's main concern however with the drafting of this more detailed Mitre Canalside Policy relates to the diagram included at Figure 4.49. This diagram, read in conjunction with the draft policy wording, unduly constrains and prescribes the form of development for the Mitre Wharf site which our client considers is inappropriately prescriptive for the site in view of the remaining level of development uncertainty. This diagram, read in conjunction with the draft policy wording, unduly constrains and prescribes the form of development for the Mitre Wharf site which our client considers is inappropriately prescriptive for the site in view of the remaining level of development uncertainty. It is recognised that the supporting text to the draft Local Plan at page 297 states that the figures contained in the Plan are to be treated as indicative however this is insufficient comfort that the current proposed policy aspirations will not overly compromise the potential for a successful development proposal on the site. As the OPDC is aware our client's site currently operates with no public access but is being identified as a site for the provision of substantial improvements to canalside access, open space and greater pedestrian permeability whilst also being subject to the aforementioned proposed height restrictions. The objectives for the site to provide greater public benefits are supported in principle by our client however a balance must be struck and a level of flexibility provided to ensure an appropriate and deliverable approach to the site's development can be found. It is generally appropriate that policy seeks to achieve the greatest public contribution to publically accessible space and improved permeability where the tallest structures are permitted and that conversely it is not reasonable to seek such substantial benefits from those sites that are most constrained. Our client has noted the precedent set by permitted heights that both the developments at Mitre Yard and 115-129 Scrubs Lane have been granted together with the level of new public accessible space these schemes have provided. Our client is concerned that their site should not be considered as providing a means to balance the deficiencies of these neighbouring sites through more onerous policy constraints on their site. We therefore propose that the policy diagram is revised. In particular, this should include the removal of the 'yellow' shading indicating 'public space / open space' between 115-129 Scrubs Lane and Mitre Wharf. We additionally request that the green arrow across Scrubs Lane terminates at the entrances to the site to indicate that it will be possible for pedestrians to enter the site either at canal level or from Scrubs Lane but not the extent or alignment of this permeability within the site. We attach to this letter a proposed alternative replacement diagram for Figure 4.49. Finally our client would request that a note is placed beneath the diagram to confirm that it is indicative. We would suggest the following statement be inserted: 'The above diagram is indicative and other configuration of public space and building frontages may be acceptable where they achieve the objectives of the associated policies.'
21	172	Agent	Jeremy Evershed MRTPI	Montagu Evans (on behalf of	Places	P10C4	a)	The Land Use section of the policy should make clear that residential led development is appropriate within the Mitre Canalside Cluster.

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				Boropex Holdings Limited)				
21	173	Agent	Jeremy Evershed MRTPI	Montagu Evans (on behalf of Boropex Holdings Limited)	Places	P10C4	a)	Our client is also concerned with the wording of part a)i) of the policy which seeks to support the delivery of a leisure, eating, drinking and community focused cluster by: "i) clustering publicly accessible active community, leisure and eating/drinking uses...at the junction between 115-129 Scrubs Lane and Mitre Wharf to improve access to the canalside space;" Whilst it is noted that 115-129 Scrubs Lane has included potential retail use fronting Mitre Wharf's northern site boundary it is important that this does not define how public space should be provided on our client's site which will need to incorporate an innovative approach to addressing the various competing requirements. These include the provision of an area of public space and a transition from the level of Scrubs Lane to the canalside level. Our client considers that the proposed public space is likely to be best located adjacent to the canal and should not be potentially diluted by the creation of a secondary elevated area away from canal where such provision is unlikely to be successful (see comment above in relation to Figure 4.49). In view of the above concerns our client considers that part "a) i)" of the policy should be reworded to simply encourage the location of active frontages both fronting the canal adjacent to Mitre Bridge, fronting Scrubs Lane and fronting significant open spaces and not specifically identify the interface between Mitre Wharf and 115-129 Scrubs Lane. Our client considers that it is important that the two schemes provide a new stretch of streetscape fronting Scrubs Lane with only relatively small opening in the street frontage to allow vehicles to access the site and pedestrians to enter. They do not consider that this edge of the site should be compromised by making up for the deficit of space provided by the approved development at 115-129 Scrubs Lane.
21	174	Agent	Jeremy Evershed MRTPI	Montagu Evans (on behalf of Boropex Holdings Limited)	Places	P10C4	a)	Additionally, our client considers that if their site is developed as two blocks similar to discussion with officers to date it may not be appropriate for the more easterly block to include Active Frontage but should be more residential in character with the possibility of duplex units at lower level. (see proposed amendments to Diagram 4.49 above/attached).
21	175	Agent	Jeremy Evershed MRTPI	Montagu Evans (on behalf of Boropex Holdings Limited)	Places	P10C4	b)	We agree with the aims and objectives of part b), which seeks to improve local connectivity and the public realm in the Mitre Canalside Cluster. However, we reiterate our concerns identified in the drafting of Policy P10 part f) (iii) and (iv). In particular, our client is concerned with the drafting of part 'b)(iii)' of Policy P10C4 which states: iii. delivering new public realm and access to the canal at Mitre Wharf. Figure 4.49 accompanying this draft policy seeks to illustrate indicatively how the new public realm might be incorporated but in doing so splits the potential developable area of the site into two with a central public space. Work undertaken to date by Squires & Partners Architects indicates that such an approach is possible however in view of the level of development uncertainty our client would suggest that a less prescriptive approach is taken to the overall layout of the site. We therefore propose that the diagram in adjusted to be less prescriptive as to how the building blocks and public realm may be distributed on this site. (see attached revised proposed diagram).
21	176	Agent	Jeremy Evershed MRTPI	Montagu Evans (on behalf of Boropex Holdings Limited)	Places	P10C4	c)	We agree with the aims and objectives of part c) and note the specific reference to Mitre Wharf's proposed contribution to this under part 'c) ii)' of the policy. Page 7 of the Grand Union Canal Massing and Enclosure Note identifies an approximate width of 3.5m for walking and cycling routes either side of the Grand Union Canal. This, in conjunction with the open space, appears overly generous mindful that any route along the north side of the canal will come to a 'dead end' on the site and therefore will not provide any form of thoroughfare. Rather, the function of the space will be to facilitate the active canalside spaces and uses envisaged for the area. We therefore consider that it is appropriate for the width of canalside area to be integrated with the open space for the Mitre Wharf site.
21	177	Agent	Jeremy Evershed MRTPI	Montagu Evans (on behalf of Boropex Holdings Limited)	Places	P10C4	d) e)	We agree with the aims and objectives of part d), which seeks to enhance local character. Designations that contribute to the local character of this area are identified as Mitre Bridge, Grand Union Canal Conservation and the St Mary's Conservation Area. We also agree with the aims and objectives of part e), which seeks to create a variety of building heights in the Mitre Canalside Cluster. The drafting of part e) does not set specific heights, although highlights relevant design informatives. This drafting is consistent with the criteria based approach set out within the development plan, including London Plan policy 7.7.
21	178	Agent	Jeremy Evershed MRTPI	Montagu Evans (on behalf of Boropex Holdings Limited)	Places	P10C4	c)_i, ii	We are, however concerned with the drafting of part d) (ii) which states development will enhance local character by: ii. delivering views along the canal and to/from St. Mary's Cemetery to/from Mitre Bridge The supporting text at paragraph MC9 states: "Local views to and from the bridge are also important for conserving and enhancing the value of local heritage assets. In light of this, development should enable views to and from the adjacent conservation areas of the Grand Union Canal and St. Mary's Cemetery." Related to this, part e) (iii) states development will "contribute to a variety of building heights by: iii. ensuring the massing and height of development at Mitre Wharf supports views to St. Mary's Cemetery and Mitre Bridge by stepping up away from Scrubs Lane while responding well to development at 115-129 Scrubs Lane." Whilst the wording is unclear as to exactly which views to and from the identified heritage assets are considered of importance our client is concerned that it could be interpreted to suggest that the Mitre Wharf Site currently allows for views between heritage assets which are worthy of protection and could thus further constrain development upon the site. It is our view that the plan should make clear through revisions to the policy wording and supporting text that it is the setting of these assets that the plan requires to be taken into account and not connecting views between such assets. In order to verify that there is no basis for protecting views across the Mitre Wharf site, Montagu Evans have undertaken an exercise to

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								establish the significance of the adjacent heritage assets and their respective settings which is summarised in the attached report. This exercise confirms that there is no evidence to support the privileging of the incidental views across the Mitre Wharf Site. It further notes that to protect such views would unnecessarily constrain development and undermine other key policy objectives and limit the potential for new high quality architecture and urban design to enhance the setting of the heritage assets. We therefore request that parts ii) and iii) of this policy should be deleted and replaced with a more general requirement to ensure that the setting of each of the identified heritage assets are appropriate assessed and considered in any application for proposed development.
23	181	Local Authority	Cllr. Muhammed Butt	London Borough of Brent	Places	P1; P2 P11		Brent Council believes this aspect of the Plan is unsound on the grounds it is not consistent with national policy, positively prepared or effective. Harlesden Town Centre is a District Centre which is immediately to the north of Old Oak. It is proposed it will connect to Old Oak Major Centre via Willesden Junction Station and Harrow Road. The offer of Harlesden Town Centre is reflective of its diverse community, and includes a range of Afro-Caribbean, South American and Portuguese shops and cafes. However, Harlesden Town Centre continues to experience high vacancy levels. In 2013 Harlesden experience 14% vacant retail floorspace (GOAD), far higher than the London average of 9.4%. As the OPDC Retail & Leisure Needs study illustrates its turnover is also relatively low for a centre of its scale, at £10.37M. This is £9M less than the turnover of Park Royal Centre, which comprises an ASDA supermarket. In light of these challenges Brent has recently appointed a Town Centre Manager for Harlesden, who will be taking forward an Action and Investment Plan to improve the centres viability. The development of a major town centre in such close proximity poses a significant risk to Harlesden Centre's future vitality. In line with the NPPF, the OPDC Retail & Leisure Needs Study has assessed the potential impact of a new major centre on Harlesden's health. The Retail & Leisure Needs Study acknowledges there will be trade draw from Harlesden given its proximity, with diversion in relation to convenience shopping of between £0.64M and £1.06M. Given the small margins Harlesden Centre is operating in this is significant in the context. Accordingly paragraph 7.7.7 states the Local Plan should 'Ensure planning policy requires a commitment that planning applications that propose a substantial amount of retail floorspace will deliver an enhancement strategy for Harlesden with LBB in order to maximise benefits for the centre and avoid the risks outlined ...' However, as worded the OPDC Local Plan does not give any certainty mitigation will be secured. Policies P1: Old Oak South, P2: Old Oak North, P11: Willesden Junction require a Harlesden Enhancement Strategy for schemes comprising over 5,000sqm of town centre uses. Supporting text states this should include details of 'potential financial contributions.' This wording is too vague. It must be a requirement that financial contributions are secured to mitigate negative impacts on the vitality of Harlesden Centre from Old Oak Major Centre. The Retail & Leisure Needs Study provides the evidence that mitigation is needed, therefore this does not need to be revisited at planning application stage. In addition, developers need to be given greater certainty over contributions required, and how this will support the Harlesden Town Centre Action and Investment Plan. Otherwise the risk is a piecemeal approach, with developers potentially proposing separate and uncoordinated interventions which may not be in Harlesden's best interests. The emerging OPDC Section 106 SPD should give clear guidance to developers as to how contributions will be calculated, and Brent Council would welcome further discussions with the OPDC in this regard. Change sought: Change wording of existing policy in P1, P2 and P11 to: g) Supporting neighbouring Harlesden district town centre by contributing to the Harlesden Action and Investment Plan where the proposal in Old Oak South provides over 2, 500 sqm of town centre uses; Relect change in para OOS.8.
23	184	Local Authority	Cllr. Muhammed Butt	London Borough of Brent	Places	P11		Furthermore, the Retail & Leisure Needs study emphasises the importance of improving connections between Old Oak and Harlesden stating at paragraph 7.7.4 'To enable Harlesden to capture regenerative benefits from investment at Old Oak, it is critical for physical and functional linkages to be improved. If the linkages are not improved, then there is unlikely to be any significant benefit to Harlesden from development within the OPDC area and the regeneration aims in the London Plan may not materialise.' It is noted, the diagram which accompanies the Willesden Junction place policy P11 reflects the existing station configuration and layout. The only notable change is Old Oak High Street which is to connect to Harrow Road to the east. However, it is not clear how connections to the west will be improved. The core of Harlesden Town Centre is the junction where High Street Harlesden meets Manor Parade. This is the focus of the primary retail area, and also the location of the locally listed Jubilee Clock which serves as a local landmark. The western exit to Willesden Junction Station therefore presents the most direct route to Harlesden Town Centre, at less than 500m. From the eastern exit it is approximately a 1km walk to the core of the centre. The station entrances indicated in the diagram are directed south towards Old Oak. This predetermines the outcome of the GRIP 3 Willesden Junction Station study, and is also contrary to the concerns raised at GRIP 2 stage by Brent Council and Harlesden Neighbourhood Forum that the station must present a sense of arrival and strong frontage to Station Road. Brent is concerned that with the configuration proposed links to Harlesden Town Centre will not be enhanced, meaning as set out in the Retail & Leisure Needs Study the centre is unlikely to benefit from regeneration at Old Oak. Change sought: P11 for the diagram accompanying policy P11 to illustrate how the station configuration and route network will enhance connections to Harlesden Town Centre to the west via Station Road.
23	185	Local Authority	Cllr. Muhammed Butt	London Borough of Brent	Places	Site allocations		Brent Council believes the Plan is unsound on the grounds it is not positively prepared or justified as it does not identify Willesden Junction Station and surrounding land as a site allocation to come forward within the lifetime of the Plan. Willesden Junction Overground and Underground (Bakerloo line) Station will be the main station serving the north of Old Oak until Old Oak HS2 and Crossrail Station comes forward in 2026. The station is used by 6.7 million passengers annually, significantly above the average of 2.9 million for London Overground stations. The station is at capacity during peak times and has a configuration which is difficult to navigate. In addition, connections between the station and surrounding area are poor. The only connection between Old Oak to the south and the station is a narrow pedestrian walkway, whilst to the east the station connects to Harlesden via a fenced off pedestrian route surrounded by railway lines. Both routes are not overlooked and poorly lit. They do not feel safe and are therefore are not desirable routes. Road congestion

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								in the surrounding area is a barrier to improving the pedestrian environment. Requests to input a pedestrian phase into the signals at Tubbs Lane/Station Approach junctions have been declined in the past due to concerns over road congestion in the network. It is crucial Willesden Junction Station is improved for the following reasons:- 1. The station needs to be upgraded to address current congestion and also to accommodate further growth, as acknowledged in the OPDC Local Plan and supporting studies. 2. To ensure Old Oak is a sustainable location for development. If connections to Willesden Junction are not safe and attractive occupiers of new development at Old Oak will not choose sustainable modes of transport, resulting in increased pressure on the existing road network. For Willesden Junction to work as a connector to the Opportunity Area and not to negatively impact on Harlesden town centre, the transport network at this location needs to address traffic reduction and improved accessibility to enable sustainable and reliable trips for residents and businesses alike. If the station and its surrounding area/connectors is not brought forward early it is considered that the mode shift away from the private car will not be achieved and therefore the area will likely experience further prolonged congestion, worsening highway safety and air quality. 3. To ensure surrounding communities benefit from regeneration at Old Oak. Harlesden and the surrounding areas are currently severed from Old Oak by railway lines. Willesden Junction is to be the main access points between these communities and the employment and leisure opportunities which will be created at Old Oak. As the OPDC Retail & Leisure Needs study acknowledges at paragraph 7.7.4 'To enable Harlesden to capture regenerative benefits from investment at Old Oak, it is critical for physical and functional linkages to be improved. If the linkages are not improved, then there is unlikely to be any significant benefit to Harlesden from development within the OPDC area and the regeneration aims in the London Plan may not materialise.' 4. To optimise development potential, and contribute to the delivery of 25,000 homes and 65,000 jobs. The above points are acknowledged in the OPDC Local Plan and supporting evidence base. The supporting Infrastructure Deliver Plan identifies the station needs to come forward within the lifetime of the Plan, in phase 0-10 years, 10-20 years. There is also a place policy for Willesden Junction P11 which promotes 'optimising development on and/or adjacent to the station and tracks.' Given the above, it is not clear why Willesden Junction has been omitted from the site allocations. This provides a lack of clarity on whether improvements to the station and its surrounds will come forward within the Plan period, or that it will contribute to the housing and employment target for Old Oak. In the absence of a site allocation there is no certainty regarding when Willesden Junction will come forward, its capacity or clear design parameters. Change sought: For Willesden Junction Station to be included as a site allocation, to provide greater clarity on its timing of delivery and for the allocation to set out how linkages will be improved to Harlesden Town Centre in line with the recommendations of the Retail & Leisure Needs Study.
23	188	Local Authority	Cllr. Muhammed Butt	London Borough of Brent	Places	P6		Brent Council believes this aspect of the Plan is unsound on the grounds it is it fails to protect specialist housing for older and/or vulnerable people where it is required to meet a need. The Housing Market Area, reflective of the country as a whole has an ageing population. The OPDC SHMA identifies a need in the Housing Market Area for 8,100 specialist older persons housing units of various types over the period 2011-37. The London Plan sets a benchmark of 8,300 over the same period. The OPDC Local Plan should therefore seek to protect existing clusters of specialist housing, including the cluster at Acton Lane within Park Royal Centre. The Acton Lane cluster is bounded to the east by Park Royal Strategic Industrial Location, to the south by Acton Lane a busy B road and to the north by Central Middlesex Hospital. Brent Council did not consider the site suitable for mainstream residential given the constrained nature of the site, environmental quality and lack of local facilities. However, the principle of supported residential on this site was allowed on the grounds of benefits to proximity of health care and the self-contained nature of these development which could provide the required facilities on site. In addition, the development would contribute to the significant need for specialist housing. On these grounds the Council granted planning consent to the now complete Victoria Centre, consisting of a care home with ancillary facilities including care and treatment facilities. Subsequently, permission was also granted for 103 self-contained one bedroom apartments as supported housing (use class C2) with associated community facilities in March 2016. The proposal was a result of Brent Council's Adult Social Care and Housing departments New Accommodation for Independent Living (NAIL) scheme to develop Extra Care and supported living accommodation in order to provide alternatives to residential and nursing care homes. It is therefore of concern to Brent that policy P6 does not acknowledge the existence of this accommodation, and the need for its on-going function to be protected. Whilst Brent accepts due to the scale of the ASDA site the environment could be made acceptable for conventional residential through comprehensive redevelopment, the Acton Lane sites are far more constrained. Given the proximity to the hospital and surrounding context they are more suitable for specialist accommodation. Change sought: P6a)ii:ii) can contribute towards the delivery of 1,400 new jobs and a minimum of 500 conventional homes and 150 principally supported housing units to OPDC's 0-10 year housing supply; c): Protecting the cluster of specialist housing at Action Lane.'
24	192	Agent	Harriet Barber MRTPI	Montagu Evans (on behalf of T.A.S.B. Investments Limited)	Places	P6	V1	With regard to Park Royal Centre, our Client supports 'Vision 1'; for an increased number of shops and services, alongside the anchor uses of Central Middlesex Hospital and ASDA, to create a more established and vibrant neighbourhood centre. T.A.S.B Investments Limited also supports the principle of the junction enhancements outlined under 'Vision 2' and the opportunity for the creation of a more attractive, greener and better integrated public realm surrounding this junction.
24	193	Agent	Harriet Barber MRTPI	Montagu Evans (on behalf of T.A.S.B.	Places	P6	a)	Our Client supports the designation of the Park Royal neighbourhood centre, as identified at Policy P6(a), and acknowledges the requirement for the delivery of a mix of town centre, employment, residential and social infrastructure uses that support the continued functioning of the Park Royal Strategic Industrial Location (SIL).

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				Investments Limited)				
24	194	Agent	Harriet Barber MRTPI	Montagu Evans (on behalf of T.A.S.B. Investments Limited)	Places	P6	c)	Policy P6(c) states that proposals should contribute to and/or deliver improvements to the function and quality of the movement network and public realm. Policy P6(c) goes on to identify the need to establish well-defined building lines, with positive and active frontages onto primary movement routes, the requirement, where possible, for access and servicing arrangements to be provided off-street and for any impacts on the capacity and functioning of the Abbey Road/Coronation Road/Action Lane/Park Royal Road junction to be mitigated. The provisions of Policy P6(c) are acknowledged by T.A.S.B, however we would emphasise the importance of ensuring that site specific circumstances are afforded sufficient consideration when assessing any development proposals against the suggested 'public realm and movement' criteria listed under Policy P6(c).
24	195	Agent	Harriet Barber MRTPI	Montagu Evans (on behalf of T.A.S.B. Investments Limited)	Places	P6	g)	Our Client recognises the importance of conserving local heritage and encourage the provisions set out Policy P6(g), to ensure that local character is informed by the area's existing heritage, including the hospital and railway related heritage.
24	196	Agent	Harriet Barber MRTPI	Montagu Evans (on behalf of T.A.S.B. Investments Limited)	Places	P6	PRC2	Paragraph PRC2 of the supporting text to Policy P6 recognises the important and strategic civic function that Central Middlesex Hospital performs. Our Client supports this recognition and notes the importance of continuing to support the hospital use and any associated functions.
24	197	Agent	Harriet Barber MRTPI	Montagu Evans (on behalf of T.A.S.B. Investments Limited)	Places	P6	PRC3	Paragraph PRC3 identifies the need for future development within Park Royal Centre, to enhance the range of services for the local catchment area and promotes the prioritisation of town centre uses as ground floor active uses onto key routes. Paragraph PRC5 further identifies the need for new shared business focussed services, alongside other complementary uses, such as a hotel, gym or crèche to address the current gaps within Park Royal. This approach is supported by our Client.
25	202	Agent	Neil Rowley	Savills (on behalf of Osbourne Investments Limited and Quattro Holdings Limited)	Places	P7		We support the vision for the North Acton and Acton Wells area.
25	203	Agent	Neil Rowley	Savills (on behalf of Osbourne Investments Limited and Quattro Holdings Limited)	Places	P7		We support the vision of Old Oak High Street. However, the planning of the route needs to minimise the amount of landtake required from surrounding development plots. The route needs to ensure that development on key sites, such as Boden House, is not compromised by land take for the new High Street reducing the proportions of the remaining plots such as to threaten their viability.
25	204	Agent	Neil Rowley	Savills (on behalf of Osbourne Investments Limited and Quattro Holdings Limited)	Places	P7		It would be helpful if Section (n) (Building Heights) was more specific about the potential location for taller buildings. This would ensure that the plan is positively prepared. Boden House meets the criteria set out in Section (n) as it is a key location on the Old Oak High Street. The Boden House site is entirely suitable for taller buildings and this should be made clear in Policy P7.
25	205	Agent	Neil Rowley	Savills (on behalf of Osbourne Investments Limited and Quattro Holdings Limited)	Places	P7		Page 50 of the revised draft Local Plan suggests that Boden House could accommodate 300 dwellings and 7,600 sq m of commercial floorspace. Our own masterplanning suggests that the site could accommodate 17,806 sq m of commercial floorspace and some 900 units. Clearly our masterplanning is at a very early stage and will be subject to much collaboration and consultation. However, it would seem that the numbers put forward by the Local Plan (page 50) are very low and could justifiably be significantly higher, particularly in such a key location within the regeneration area. In the context of a significant housing shortage within London, it is important that the best possible use is made of such sites. This would ensure that the plan is positively prepared and consistent with national policy.
25	206	Agent	Neil Rowley	Savills (on behalf of Osbourne Investments Limited and Quattro Holdings Limited)	Places	P7		The rationale for the Elizabeth Line Spur is understood but it is not clear that the Spur is feasible, from a railway engineering point of view, or financially viable. The link is not safeguarded by either the Secretary of State for Transport or Transport for London as part of HS2 or Crossrail and the Development Corporation does not have the powers to safeguard land for the link itself. A link between High Speed 2 at Old Oak Common and the West Coast Main Line is not being taken forward as part of the HS2 Parliamentary Bill or Crossrail Act and should therefore not form part of the Draft Local Plan. The Elizabeth Line Spur has the potential to cast quite a shadow over the development of the Boden House site. The landtake and construction site could take up a significant proportion of the site. It could stymie development for some time and threaten wider objectives such as the Old Oak High Street. The ODPC needs to quickly investigate the feasibility of this Spur and decide whether or not safeguarding is genuinely required.
25	207	Agent	Neil Rowley	Savills (on behalf of Osbourne Investments Limited)	Places	P7	p)	Policy P7 p) safeguards the Quattro site (to the rear of Boden House) for "waste management purposes and other appropriate uses" following release of use for HS2 purposes. This is confirmed in Policy EU6. However, it is not considered that the provision of a waste management site would be an appropriate use within the proposed vision for North

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				Limited and Quattro Holdings Limited)				Acton and Acton Wells. The site is adjacent to the Old Oak High Street, which is intended to create a high quality mixed use environment. Policy P7 calls for 'high quality public realm supported by positive and active frontages' and 'high quality well-connected publicly accessible open spaces.' It is not considered that waste management or similar uses is compatible with those objectives. It is likely to require a large building with frequent HGV access. For those reasons we suggest that we investigate, with the OPDC, the relocation of the waste management use elsewhere in the area. This is suggested (in principle) by Policy EU6. Policy P7 p) should therefore refer to the possibility of the waste site being relocated to ensure that the mix of uses in the vicinity of Old Oak High Street is compatible with the vision of a high quality environment. This would ensure that the plan is positively prepared and consistent with national policy.
25	209	Agent	Neil Rowley	Savills (on behalf of Osbourne Investments Limited and Quattro Holdings Limited)	Places	Site Allocations	11 and 12	Figure 4.2 (site allocations) ought to better reflect the land ownership of the 'Shield' site as follows: (note - see diagram in submitted response showing Shield Site stretching eastwards to rail sidings.)
27	215	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Places	P7 P8		These representations are submitted by Treanor Consulting of behalf of Castlepride Limited, owner of a 0.21 hectare site at the southern end of Midland Terrace, known as Midland Gate. The site will be bisected to the north by the proposed pedestrian and cycle bridge to link Old Oak Common Lane Station westwards to Victoria Road. The proposed link is identified as Place P7C2, North Acton and Acton Wells. It forms part of the Major Town Centre along Old Oak High Street and a Cluster. The remainder of the Midland Gate site is within Place P8, Old Oak Lane and Old Oak Common Lane. Redevelopment of the site at Midland Gate can help facilitate this important link. These representations seek modifications to the draft policies and supporting text to provide further clarity and flexibility for development to come forward in accordance with the wider objectives of the draft Plan.
27	217	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Places	P7C2	f) OCL.4	The policy should refer to potential for a tall building on the main part of the Midland Gate site. Policy P7 (n) refers to tall buildings at Old Oak Common Lane Station. A considered and well designed development at Midland Gate can provide a transition in scale that respects the sensitivities of neighbouring dwellings and achieves other development objectives in the Plan. Redevelopment of this site can help deliver a key piece of infrastructure and help reduce severance. The proposed bridge link is part of the new High Street, a Major Town Centre and the Station Cluster. The site will have access directly in to Old Oak Common Lane Station and have a future PTAL 6 rating ie the highest level of public transport accessibility. The site is suitable in principle for a tall building. The environmental implications and potential impacts on local amenity arising from a specific design and other development control considerations would be assessed against relevant policies in the Plan. Para OCL.4: The supporting text should be amended to reflect our representations on part (f) of P7C2.
27	218	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Places	P7C2	OCL.5	The supporting text should not be too prescriptive and should recognise that development at Midland Gate could proceed in advance of the station. The site is vacant and identified for delivery in years 0-5. Key is that a redevelopment scheme does not prohibit the station coming forward and is designed to successfully integrate with the station
27	219	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Places	P8		Land use: Include reference within the policy to the development opportunity at Midland Gate, recognised in Policy P7C2 and its supporting text. As the site is covered by both P7C2 and P8, there should be consistency.
27	220	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Places	P8		Part (k.iv): The policy should be amended to be consistent with our representations on Policy P7C2. We acknowledge proposed building heights should respect the sensitivities of existing residential areas but in some instances there could be scope for new development to provide a transition in scale. In the case of Midland Gate, new development can help to integrate the elevated bridge link. It is also important the policy does not preclude potential for tall buildings on the main part of the Midland Gate site, as this will optimise redevelopment potential and help deliver infrastructure improvements.
27	221	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Places	P7		The policy and the text in the table (page 101) should be amended to be consistent with our representations on Policy P7C2 and Policy P8.
28	256	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Places	P1		The policy and supporting text needs to recognise that redevelopment of the Elizabeth line depot site is a long-term scheme, and it will take significant resource and investment to deliver, the timing of which will be beyond the Plan period. References to the Elizabeth Line depot site being delivered as part of the current Local Plan should therefore be removed. However, policies to facilitate this in the longer term will be important, if it is to be feasible. Any future redevelopment on the depot site will need to be both viable and deliverable, which may impact on the end uses that can be provided. The site cannot be considered in isolation and has to work as part of a long-term holistic strategy. To support this longer term aspiration, policies should ensure that proposals for neighbouring sites coming forward in advance of the redevelopment of the depot site should not preclude development of it or sterilise it and indeed where possible create opportunities for its appropriate and comprehensive development. It should be acknowledged in the policy that the delivery of Old Oak South is still subject to further feasibility work, including to determine

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								whether the Elizabeth Line depot can be brought forward for development in the longer term along with continuing operational use. TfL suggests that the text in OOS.3 be amended to read: 'OPDC is working closely with TfL to identify and assess potential options for the future of the Elizabeth line depot and siding site to enable the delivery of homes and jobs in the longer-term, beyond the current Plan period.'
28	257	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Places	P1	OSS.12	Surface Links from Old Oak Station to Old Oak South and North. TfL suggests that the text be amended to read: 'OPDC is working with TfL and HS2 to assess the feasibility and develop the designs and business case for the different bridge connections required to link the Old Oak station to the proposed Old Oak South and North development areas to the north of the depot and Grand Union Canal.'
28	258	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Places	P2	OOC.7	It is not clear what time period and future year the station demand figures described in paragraph OOC.7 represent. This needs to be made clear to allow comparison with other stations.
28	259	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Places	P2 P2C1		Work by TfL in developing the design and business case for the potential new London Overground station at Hythe Road is still taking place. The draft Local Plan suggests some design solutions. However, the final station proposals and arrangements for the public realm will be developed through close working between TfL, OPDC and other stakeholders. As new London Overground stations are not yet committed or funded, wording should refer to a 'potential' new station at Hythe Road.
28	260	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Places	P7 P7C1		The policies and supporting text for North Acton station are broadly consistent with TfL's aspirations for the interchange. Improving the capacity and accessibility of North Acton Station is key to ensuring that growth in North Acton can be delivered in a sustainable manner. TfL suggests that the policy and supporting text should emphasise the importance of the station improvements in providing additional capacity and step free access and the delivery of associated pedestrian and cycle links between the station and development sites.
28	261	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Places	P7		This is the first place in the document that the potential Elizabeth line – West Coast Main Line (WCML) spur is mentioned. The text should explain what this scheme is to aid understanding using wording agreed with TfL. It should be noted that this potential connection would not be compatible with proposals being put forward by Chiltern Railways to operate a regular passenger service from northwest London and Buckinghamshire to Old Oak Common using the Wycombe Single line.
28	262	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Places	P7C1	e)	With reference to Policy e), the southern station square has not been built yet so should not be referred to as 'existing' and instead should be identified as potential. This is also relevant to paragraph NAT.4.
28	263	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Places	P7C2 P8		Work by TfL in developing the design and business case for the potential new London Overground station at Old Oak Common Lane is still taking place. The draft Local Plan suggests some design solutions. However, the final station proposals and arrangements for the public realm will be developed through close working between TfL, OPDC and other stakeholders. As new London Overground stations are not yet committed or funded, wording should refer to a 'potential' new station at Old Oak Common Lane
28	264	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Places	P7C2		Surface Links from Old Oak Common Station to North Acton. The wording should be amended to read: 'Work on the surface links from Old Oak Common Station to the potential Old Oak Common Lane station and onwards to North Acton are still the subject of ongoing design work and may change from indicative plan.' The delivery of a public route between Old Oak South and Acton Wells is challenging and TfL supports the reference in this policy that seeks to ensure the technical feasibility and viability of delivering this route.
28	265	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Places	P8	c) OOL.5	TfL supports the retention of both the SIL designation and the bus garage use set out in P8 (c). The bus garage is important in maintaining the local bus network and providing well located capacity to help meet the demands from the significant growth taking place and planned in the area. It should be noted that the site is known as Willesden Junction bus garage rather than Harlesden bus depot As stated in OOL.5 there would need to be agreement with TfL that the site is no longer required for a bus garage or that an equivalent in terms of capacity, facilities, terms and location is agreed with TfL before the existing site could be considered for redevelopment for non-bus use.
28	266	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Places	P10		TfL supports the intention to provide improved cycling facilities along Scrubs Lane to connect with the wider cycle network and strategic cycling routes such as quietways and the proposed cycle superhighway along the A40 corridor. A buses corridor study of Scrubs Lane is also underway and is investigating measures that could improve reliability and journey times along this corridor. It will be important that any changes to Scrubs Lane provide benefits to both cycling and buses and also pedestrians.
28	267	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Places	P10		Any proposals for potential long-term redevelopment that affected operational rail facilities including North Pole train maintenance depot would need to take account of future operational needs. The statement that North Pole depot will 'likely be available for development after the Plan period' in paragraph SL.19 does not appear to be justified by evidence, given the envisaged long term use of the depot by the rail industry.
28	268	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Places	P11		The policies and supporting text for Willesden Junction are broadly consistent with TfL's aspirations for the interchange. Potential improvements at Willesden Junction station and in the surrounding area have been informed by the findings of the recent Willesden Junction station feasibility study and will need to be both viable and deliverable. They should take into account the needs of current and future transport operations and involve full consultation with relevant transport authorities and providers.
28	269	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Places	P11		Any proposals for potential long-term redevelopment that affected operational rail facilities including Willesden train maintenance depot would need to take account of future operational needs. Any de-designation of rail sites would be subject to standard rail industry procedures and consultation.
28	270	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Places	P11		It should be assumed that there will be a need to retain bus interchange and standing facilities on Station Approach at Willesden Junction, although in the long-term if a link suitable for buses is built over the WCML rail tracks, connecting Willesden Junction with the potential Hythe Road station and the Old Oak Common interchange station (such as the proposed High Street), bus standing at Station Approach may no longer be required.
29	300	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus	Places	P7	Vision	The vision proposed for the North Acton area is strongly supported by our clients, particularly the recognition that North Acton and Acton Wells "will be a high density area" and noting point V3 which states:

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				Group and Fuller Smith & Turner)				"The area will see high quality tall buildings being delivered in appropriate locations, with high density housing being the main land use along with new hotel and student accommodation."
29	301	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Places	P7	a) - f)	Citrus and Fullers support the range of land uses proposed for North Acton within Policy P7, especially the targets identified under (b) to support the delivery of mixed use high density residential and student accommodation, which are considered to be suitable uses given the existing and emerging developments in the area. Fullers also support the provision under (d) for the delivery of town centre uses within designated town centres.
29	302	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Places	P7	g) - j)	Our clients support proposals under (g) and (j) to deliver a coordinated high quality public realm supported by positive and active frontages. Citrus incorporated a detailed public realm offering, with active ground floor uses spilling out into this, as part of The Portal scheme and designed the scheme such that it connected well to the existing and emerging network of emerging public spaces in North Acton.
29	303	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Places	P7)	n)	The principle of tall buildings in North Acton neighbourhood town centre and other key routes is supported as this is considered clearly to be reflective of the existing, approved and emerging scale of development in North Acton.
29	304	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Places	P7)	m)	Our clients strongly object to the proposed local listing of The Castle as referenced under (m) and shown on Figure 4.32 of Policy P7. The justification for this is provided as a single response to Policy D8 below. They also disagree with and object to the justification suggested in NA.15 for preserving The Castle.
29	305	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Places	P7)	m)	Beyond the previously locally listed Elizabeth Arden Factory, no other buildings in North Acton have previously been considered to be worthy of designation as a locally listed building by the Ealing Council. Nothing has changed in the interim to suggest a different conclusion in respect of this building; In the determination of the various recent applications for new developments in North Acton, no heritage assets (aside from the Elizabeth Arden Factory) were identified by the Council or constituted a material consideration
29	306	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Places	P7)	m)	The setting of North Acton has changed from what used to be a historic industrial area to one which is now dominated by tall residential/student accommodation blocks and modern light industrial units. Consequently it is considered that The Castle is now completely out of scale and context with the developments around it and represents inefficient use of land within a designated Opportunity Area. Given that Policy P7 promotes the high density mixed-use development of tall buildings in North Acton (to provide a significant contribution to meeting housing needs), it is not considered that the change in the area from one of industry and rail and road networks should be cited as a reason for retaining buildings with little or no historic value, and where doing so could undermine the objectives of the planned and emerging environment.
29	307	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Places	P7)	m)	That the area has changed and other buildings in the vicinity may have been lost over the years does not affect the historic significance (or lack thereof) of The Castle. What has happened elsewhere should have little or no bearing on an assessment of the merits of locally listing this specific building, which is unremarkable and where there are many other examples of buildings typical of this era.
29	308	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Places	P7)	m)	The current building is somewhat dilapidated and requires significant investment. Externally it is a physically unremarkable building and now sits in an an area which has undergone – and continues to undergo – rapid change. A large amount of The Castle's current trade came from Carphone Warehouse employees but their office has planning permission and is expected to be redeveloped for residential uses. The area is changing both physically and demographically. New developments planned in the area are incorporating and range of commercial uses at ground level including A3/A4 units (i.e. planned within the 'Perfume Factory' development which is located directly opposite the site). There will be no shortage of such uses in this newly forming neighbourhood and the quality of the commercial accommodation proposed will be designed to meet the needs of occupiers and satisfy the demands of the changing demographic client base in the area.
29	309	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Places	P7C1		As identified above, Citrus and Fullers are supportive of the principle of a vibrant high density neighbourhood town centre supported by a variety of town centre uses with residential above as outlined in Policy P7C1. However, both parties object to the retention of The Castle as a locally listed building as identified on Figure 4.35 and particularly the retention of the building, and use, in its current layout and form which represents an inefficient use of a prominent corner site given the policy direction for the area as a whole. The Castle is an unremarkable pub typical of its era and of little intrinsic historic value. It does not sit comfortably with the rapidly evolving built environment and changing demographic in North Acton.
30	340	Local Authority	Steve Barton	London Borough of Ealing	Places	P3		The approach to the Grand Union Canal is supported and as is the proposal to implement a Conservation Area covering the canal throughout its length. This is an important supplementary east-west pedestrian and cycle route that and one which can help to generate active frontage throughout Old Oak and into Park Royal. The networked and multi-functional nature of proposals for this space are an important model for the rest of OPDC where recreational areas will be at a premium.
30	341	Local Authority	Steve Barton	London Borough of Ealing	Places	P4		The difficulty of formulating the OPDC Local Plan in advance of the new London Plan is clear in the sections that relate to Park Royal. Industrial land policy in London as a whole is currently failing both to protect land supply and deliver the type of industrial and warehousing development that is needed. SIL is still very much a general-purpose designation which serves industrial uses simply by excluding non-conforming uses and in effect suppressing the land price by limiting competition. In effect, its role is a complicated mix of securing the industrial baseline of land supply, allocation of strategic functions such as waste necessary to support the running of the city, and driving the growth of business and economic development, none of which is inherently complementary to the others. Jobs density, for example, is often inherently inimical to efficient warehouse and logistics operation. We would be happy to work with OPDC to develop a revised policy wording that identifies spatial opportunities in Park Royal and anticipates the evolution of London Plan policies on industry.

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30	342	Local Authority	Steve Barton	London Borough of Ealing	Places	P4		Industrial Intensification seems to have no thematic policy and is therefore largely expressed through the Park Royal section (see detailed comments for E1 & E2). As covered in the General Comments above, OPDC needs to be prepared to add more detail to this approach in order to actually deliver intensification.
30	343	Local Authority	Steve Barton	London Borough of Ealing	Places	P4		The policy seems also to lack an appreciation of the existing spatial characteristics of the area, especially in patterns of use and size of premises. There is already an apparent clustering of smaller higher intensity units around areas of good access to public transport such as those near to North Acton and Park Royal Underground Stations. Larger floorplate uses with a freight focus, however, focus unsurprisingly on main arterial roads and towards the centre of Park Royal.
30	344	Local Authority	Steve Barton	London Borough of Ealing	Places	P4		Park Royal is a prime location for a demand responsive bus service incorporating the tube stations on the periphery. This is an opportunity to place a marker for TfL as they develop such services.
30	345	Local Authority	Steve Barton	London Borough of Ealing	Places	P5		There is a fundamental tension between the nature of SIL as a development designation designed to drive economic and industrial growth and the protectionist nature of this policy. At this stage Ealing neither supports nor opposes the proposed new Conservation Area at St Leonard's Road. However, the nature of this area is more one of a concentration of individual buildings with heritage merit than the kind of integrated and coherent built fabric that is normally managed by a CA designation. The key environmental characteristic here seems to be the finer grain of spaces and buildings than in the rest of Park Royal. Retaining and enhancing this is as much a task for development as it is for conservation, and there are notable examples of poor quality and fragmented built fabric that would benefit from replacement. It is questionable whether the general prohibitions against demolition that come with CA designation are desirable within SIL. Given the unusual circumstances it may be worth exploring alternative measures to protect specific buildings of heritage interest, and design and character guidance for the rest of the area.
30	346	Local Authority	Steve Barton	London Borough of Ealing	Places	P6		The main need for Park Royal is uses which animate and civilise the main Coronation Road/Acton Lane and Abbey Road/Park Royal Road routes; that is to say a linear 'centre' not a point centre. While the broad environmental objectives of this policy are supported therefore, development of the centre should not be at the expense of a coherent spatial strategy for Park Royal (which is expanded in P4 above).
30	347	Local Authority	Steve Barton	London Borough of Ealing	Places	P6		Park Royal Centre should really be treated as the first site in Park Royal for mixed industrial-residential development. This is in any case what the Centre be in its relationship with the rest of Park Royal so it makes sense also to follow an approach of industrial compatibility.
30	348	Local Authority	Steve Barton	London Borough of Ealing	Places	P6		Particular care should be taken here that the sequential test set out in TCC1 does not allow the proliferation of retail uses into the surrounding SIL, much of which would qualify as an edge of centre location.
30	349	Local Authority	Steve Barton	London Borough of Ealing	Places	P7		As the plan notes, regeneration in North Acton is already well underway, and the question here is chiefly of linking and integrating this growing community to the emerging centre at Old Oak. All of the key priorities identified in policy P7, which sets out the area specific plans for North Acton, are supported by LB Ealing. In particular I agree with North Acton's designation as a neighbourhood centre, the importance of public realm improvements at Station Square and the gyratory, and the need for more active frontage. Retail uses in this area should be seen as just as important in generating active frontage as they are in meeting service needs. Design and development management strategies that produce better frontages for supermarkets and convenience retail are a longstanding requirement in planning, and North Acton will benefit from the early realisation of broader OPDC policies on meanwhile uses and active frontage.
30	350	Local Authority	Steve Barton	London Borough of Ealing	Places	P7		The aim for a full, mixed-use town centre with residential, retail and employment is welcomed
30	351	Local Authority	Steve Barton	London Borough of Ealing	Places	P7		It is necessary to be explicit that the links between North Acton and Old Oak, particularly the new pedestrian/cycle route via Old Oak Common Lane Overground Station, are direct and legible. The indicative route through the Shield Site is currently quite circuitous and does little to integrate North Acton with the core of development around Old Oak. This link is more than simply symbolic, it is the only dedicated car-free route between the east and west sides of the OPDC other than the canal towpath, and one of only three links in total that cross Old Oak Common Lane/Victoria Road.
30	352	Local Authority	Steve Barton	London Borough of Ealing	Places	P7		The approach to student housing is more nuanced in the Plan than it was in the vision and we support the policy of ensuring balance here rather than a presumption that there is already an excess of provision.
30	353	Local Authority	Steve Barton	London Borough of Ealing	Places	P7		Proposals for the public realm are welcomed and it is hoped that the scale of the proposals here and in combination with Old Oak will finally enable resolution of the problems that the gyratory system causes for pedestrian and vehicle.
30	354	Local Authority	Steve Barton	London Borough of Ealing	Places	P7		The policy currently has very extensive public realm proposals for the area surrounding North Acton Station but does not appear to set any concrete objectives for the upgrade of the station itself. Ealing is currently developing proposals for the improvement of the station, and in particular the delivery of step-free access, in collaboration with TfL and this objective should be explicitly included in this policy.
30	355	Local Authority	Steve Barton	London Borough of Ealing	Places	P8 P9		It is understood that Channel Gate, along with Old Oak Lane forms part of the broader Victoria Road - Old Oak Lane planning framework. This combined approach is supported as together these places form the key link between the completely new network of streets and uses at Old Oak and the retained and intensified uses in Park Royal. This is a complex site, home to existing residential communities, two Conservation Areas, the HS2 construction sites, and the vital north-south artery of Old Oak Lane/Victoria Road. The principal consideration in its development must be of protecting the amenity of current residents and maximising the potential that is presented by its improved access to public transport.
30	356	Local Authority	Steve Barton	London Borough of Ealing	Places	P9		P9 must be explicit that the area will be subject to a specific planning framework once the site is released from HS2 works. While the policy makes reference to high density industrial uses, this area is not covered by the Park Royal Intensification Study and so there is currently little guidance as to what this will look like. Channel Gate is the largest area of cleared land outside of Old Oak itself and is probably the best opportunity in OPDC for the delivery of exemplar industrial intensification.
30	357	Local Authority	Steve Barton	London Borough of Ealing	Places	P8 P9		This area will constitute, along with the sites north of the mixed uses at North Acton Station, part of a transition zone of more intensive employment uses that are still within easy walking distance of railway links, and the more extensive and road traffic based uses in the centre

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								of Park Royal. It offers great potential to act as an exemplar for SIL intensification and in making a successful transition between industrial zones and the core of Old Oak.
30	358	Local Authority	Steve Barton	London Borough of Ealing	Places	P8 P9		P9 also has a key responsibility to the Conservation Area at Old Oak Lane, and this is acknowledged in the policy. These constraints relate to views into and from Old Oak Lane and also to the mitigation of traffic, which is the most serious current threat to the CA.
30	359	Local Authority	Steve Barton	London Borough of Ealing	Places	P8 P9		Old Oak Lane/Victoria Road currently acts as the only road link between the east and west parts of the OPDC area with all vehicle routes merging with it at some point, the only alternatives being via the proposed pedestrian/cycle link to North Acton, and along the canal towpath.
32	395	Local Resident	Bernie Timmins		Places	P8		living in a community of small cottages, with high rises popping up regularly in the local area. I am keen to see that Stephenson Street, Goodhall, Crewe & stoke place and old oak lane, do not end up being 'hemmed in' by surrounding high rise buildings and that this is taken into account. Our area is already surrounded by industry and we need to have some distance between our small houses and new tall buildings or we will feel completely suffocated.
32	396	Local Resident	Bernie Timmins		Places	P8		I would like to see attention paid to the preservation of our cottages, particularly in future planning applications for extensions. This is one of the only areas in London with homes such as ours and residents are eager to see them preserved in their original state. With so much development in Old Oak and Park Royal, it is so important to retain buildings with an architectural heritage. Changes cannot be undone and for such a small area it is important that this mistake is not made and the area and history is respected. A dormer window can only provide a small (extra) space in these properties, nothing with a substantial benefit. So it does not make sense to give planning permission to residents for developments which could (and probably will) ultimately destroy the style and historic value of our homes. We do not want their uniqueness (in this day and age) swallowed up with all the other developments. I can only hope that the OPDC are capable of seeing this and being sensitive to it. The area is going to be swamped with new modern blocks and buildings, it is so important to respect and maintain existing buildings with such a historic value.
32	397	Local Resident	Bernie Timmins		Places	P8		I am also keen to see green spaces for the local area, particularly when there will be so much building work going on. Any green space can contribute to being a 'buffer' to the surrounding work. Channel gate road is already is noisy, dirty and dangerous road cutting right through a residential area and if this were to be closed to HS2 traffic and used as a green space for the local community this would help enormously. The noise, dirt and poor air quality for residents of the area are already intolerable and this will only get worse when HS2 begin work.
32	398	Local Resident	Bernie Timmins		Places	P3		existing problems for pedestrians on the canal need to be addressed. Cyclists do not have 'right of way' but pedestrians do, however you would never know this as cyclists are a menace. There have been several issues and incidents which are on the increase due to the aggressive nature of cyclists using the towpath as Le tour de France with no consideration for pedestrians whatsoever. Seriously needs looking at in more depth.
33	407	Strategic Partner	Mark Furnish	Sport England	Places			Many of the place specific policies in Chapter Four seeks the development of improved walking and cycling provision, the protection and provision of open space and to create and improve active street frontages all of which align to some Active Design principles. Designing activity into places would encourage a community to be active which is supported by Sport England. Sport England recommend that these policies make specific mention to Active Design so developers, urban designers, architects etc. are clear on the principles that should be engrained with development.
33	408	Strategic Partner	Mark Furnish	Sport England	Places			There is, however, no mention of playing fields or playing pitches within the places policies which is concerning given the number of new homes that would be created within the area. This new accommodation would increase demand for sports facilities, playing fields and built facilities, that is unlikely to be meet by the existing facilities. In consequence, the place policies should have playing fields and sports facilities included so that it is clear where and what will need to be provided in the future. This provision should be based on a PPS and BFS for the Old Oak and Park Royal Area which has not been undertaken therefore the actual requirements are not known. Since the required facilities are not known OPDC cannot positively plan for sport and recreation and therefore it is not clear if the health and wellbeing strategic aims highlighted in the Strategic Policies and Spatial Vision would be achieved. Policy P1: Old Oak South and Policy P2: Old Oak North do, however, state that sport and leisure centres would be provided in these areas but it is not clear what this requirement has been based upon. It is not clear what specific built facility needs would be required for the area and if these areas are the best location to meet the needs of the community. Paragraph OOS.20, for instance, indicates that the Sports Courts and Swimming Pools Study and Development Infrastructure Funding Study identifies a need for an onsite sport and leisure facility including a 25m swimming pool but a 50m pool if feasible, but although feasible will it be needed? Sport England have worked with the London Borough of Hammersmith and Fulham to look at sports hall and swimming pool future demand but this was based around that Council's borough, which the Old Oak and Park Royal Area partly falls within, but may not have focused on the whole of the Old Oak and Park Royal catchment area (see below – under Policy TCC6 discussion)
33	409	Strategic Partner	Mark Furnish	Sport England	Places	P4 P5 P7		In relation to playing fields, although not specifically mentioned Policy 4: Park Royal West and Policy 5: Old Park Royal does indicate that existing open space should be protected so it continues to provide recreation and new spaces should be provided and Policy 7: North Acton and Acton Wells states that high quality multifunctional publicly accessible open spaces with a variety of functions will be required. This appears to suggest some thought relating to playing field but Sport England considers this too vague and could result in limited open space/parks for formal, and to a lesser extent informal, sport needs that might be required from the increase in demand highlighted above.
33	410	Strategic Partner	Mark Furnish	Sport England	Places	P10 P12		Existing playing field, in particular Wormwood Scrubs, but other playing field as well, should be protected. This protection should be extended to its functionality. Sport England welcomes requirement in Policy 12: Wormwood Scrubs that the long term management and maintenance of the site should be secured however the wording of the this policy, and Policy 10: Scrubs Lane, appears to suggest that footpath's and cycleways could dissect the playing field. Sport England object to this as it would affect the functionality and the quality of the playing field. These policies should be reconsidered so it is clear that the playing field, including its function and quality, should be retained and protected, and that footpaths and cycleways, or any other infrastructure/facility, should not dissect or be placed on the playing field unless it is ancillary/supportive to the playing field use.

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33	411	Strategic Partner	Mark Furnish	Sport England	Places	P10 P12		These policies also mention that the Wormwood Scrubs and nearby parks should be improved. Sport England would support this provided the improvement works are needed as clearly set out in a robust PPS that has been collaboratively developed with key stakeholders, such as Sport National Governing Bodies, OPDC, Sport England, local clubs etc.
33	412	Strategic Partner	Mark Furnish	Sport England	Places	P12	Figure 4.52	Although indicative, Sport England has concerns with Figure 4.52 in relation to the area that is included for sports pitches as this does not correspond with the area that currently has playing pitches marked. Sport England would object to the loss of any playing pitches and playing field unless it meets its playing field policy and therefore has considerable concerns with Figure 4.52 as it is suggesting that a loss of playing field land is proposed.
35	437	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Places	Site Allocati ons		The table should acknowledge that the development of Oaklands has commenced. Additionally, as referred to above, the EMR site is capable of greater and earlier delivery of new homes and other development.
35	438	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Places	P1		The development of Oaklands delivers on the vision for Old Oak South and on the various aspects of the Policy. This includes the early delivery of new homes, commercial space, public open space and the first phase of Park Road. The fact that this development has now commenced should be acknowledged in the supporting text.
35	439	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Places	P2		The Policy and supporting text should acknowledge that a new bridge link to an improved Willesden Junction Station can happen as an early phase of the regeneration, which will significantly improve the PTAL rating and, together with the extension of Park Road over the Grand Union Canal, open up Old Oak North for development to commence within the 0-5 year timeframe.
35	440	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Places	P2		Careful consideration should be given to the environment created by the Old Oak sidings waste site and it needs to be designed and managed in such a manner to allow its successful integration with the new housing being developed.
35	441	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Places	P2	h) i.x	Under points h) and i)x) of the Policy, acknowledgement should also be made that the EMR site could come forward for early development delivering significant numbers of new homes and jobs.
35	442	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Places	P2	i.iii	Point i)iii) should refer to the importance of the early delivery of the new bridge link from EMR to an improved Willesden Junction Station.
35	443	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Places	P2	n)	Point n) should acknowledge that it may be appropriate for taller development to be proposed near to the bridge to Willesden Junction Station.
35	444	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Places	P2	OON.2 OON.15	OON.2. The supporting text needs to acknowledge that providing the new bridge connection to Willesden Junction Station will improve the PTAL level of the area and facilitate the early delivery of new housing and jobs. This also needs to be reflected in OON. 15.
35	445	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Places	P8 P8C1		As referred to above, the development of Oaklands also delivers on the vision for Old Oak Lane and Old Oak Common Lane (and Atlas Junction Cluster) and on the various aspects of the Polic(ies). This includes the early delivery of new homes, commercial space, public open space and the first phase of Park Road. The fact that this development has now commenced should be acknowledged in the supporting text, particularly at OOL.3. The continued development of Oaklands North could also come forward concurrently and add to the benefits arising.

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35	446	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Places	P10		We support the vision for early delivery of new development along Scrubs Lane.
35	447	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Places	P11		We support the vision for Willesden Junction. However, we consider the station improvements and critically the delivery of a new bridge link to Old Oak North to the south should be a stated early priority for the Local Plan.
35	448	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Places	P12		We support the aims of the policy to improve access to Wormwood Scrubs for all Londoners.
36	458	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Places			The Mayor is satisfied with the spatial elements of the SIL consolidation which maintains the majority of the Park Royal SIL (central/west) and de-designates the eastern parts around the new HS2/CR1 interchange and around North Acton. The key consideration is to what extent can the retained parts of SIL in Park Royal be intensified for industrial development and provide capacity for any displaced business uses in the areas of SIL to be de-designated. For example, do any of the site allocations (page 50) link to intensification of industrial uses in SIL? The Plan should set out how the intensification of SIL will happen if it is not linked to these site allocations. The approach should be informed by OPDC's intensification study that looks at the industrial potential in Park Royal.
36	459	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Places	P4		Park Royal is not London's leading location for business as stated on page 80, that is the role of the CAZ. The Vision in V1 "Park Royal West will remain as London's leading location for large, medium and small businesses" should be caveated as 'industrial' businesses.
36	465	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Places	P1 P2		These areas will be the focus of major land use change and will be at the heart of the redevelopment of the Opportunity Area. The areas are focused on new transport infrastructure which will radically change the public transport accessibility of this part of London and will create new public transport links around London and to other parts of the country. Therefore, in line with London Plan policy 3.4 and the Mayor's Housing SPG it is appropriate that land is developed to a high density to maximise this accessibility and tall buildings will be appropriate in these areas.
36	466	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Places	P12		This is one of the most important open spaces in the Local Plan area. Given that the local area will become home to many new residents, workers and visitors, it is appropriate that access to Wormwood Scrubs is improved and increased and that the open space provides a wide range of appropriate uses and green infrastructure functions, as supported by London Plan Policy 2:18. Some care will be required in order to ensure that there are no adverse impacts on biodiversity, as required by London Plan policy 7.19.
36	473	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Places	P1		While TfL will work with the OPDC should any opportunities and funding arise sooner, the presumption must be that future commercial and residential development in conjunction with continuing operational use of the Elizabeth line depot site could only come forward in the longer term. With the exception of design and consents activity, this will be beyond the Local Plan period. This presumption needs to be reflected in the Strategic Policies, in site allocations for Old Oak South in the Places chapter and in the delivery programme. All references to the Elizabeth line depot site being delivered as part of the current Local Plan should therefore be removed.
36	476	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Places			Rather than referring to a station square as the preferred design solution for all new or redeveloped stations, the wording should be more flexible to allow for alternative public realm solutions that may emerge from design and development work
36	481	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Places			The Mayor supports the retention of both the SIL designation and the bus garage use on the site at Willesden Junction referred to in policy P8. The bus garage is important in maintaining the local bus network and providing well located capacity to help meet the demands from the significant growth taking place and planned in the area.
38	503	Local Resident	Tim Potter		Places	P9	V1, g,h	I would urge your planners to do as much as you can to enhance the environment of the 220 railway cottages in the area know as The Island Triangle that takes in Old Oak Lane, Goodhall Street and Stephenson Street. There is a golden opportunity to improve this area through enhancing its 'village feel' and connecting it to the more modern aspects of the development. The neighbouring building known as The Collective has been at pains to work and involve local residents, for example opening up their space for local groups to meet. I would welcome as much as possible in terms of public space as well as enhancement of the public environment. The railway cottages are an historic feature of the area which, if improved, can substantially add to the character and appeal of the whole development area.
39	511	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Genesis)	Places	Site allocations	4.2	The table should acknowledge that the development of Oaklands South has commenced.
39	512	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Genesis)	Places	P1		The development of Oaklands South delivers on the vision for Old Oak South and on the various aspects of the Policy. This includes the early delivery of 605 new homes (with 40% affordable), new commercial space, public open space and the first phase of Park Road. The fact that this development has commenced should be acknowledged in the supporting text.
39	513	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Genesis)	Places	P2		The Policy and supporting text should acknowledge that the development of Park Road can happen as an early phase of the regeneration and assist in opening up Old Oak North for development to commence within the 0-5 year timeframe. Careful consideration should be given to the environment created by the Old Oak sidings waste site and it needs to be designed and managed in such a manner to allow its successful integration with the new housing being developed.

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39	514	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Genesis)	Places	P8	00L.3	As referred to above, the development of Oaklands South also delivers on the vision for Old Oak Lane and Old Oak Common Lane and on the various aspects of the Policy. The fact that this development has commenced should be acknowledged in the supporting text, particularly at OOL.3. The continued development of Oaklands North could also come forward concurrently and add to the benefits arising.
39	515	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Genesis)	Places	P8C1		The same points apply here as for Policy P8.
40	517	Local Resident	Lori Wiechec		Places	P9		As a local resident, 66 Goodhall Street Nw10 6TU my concerns lay with there not being an outlined buffer zone that protects the railroad cottages and our community.
42	554	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Places	Site allocations		Whilst we recognize that the number of housing units and commercial floorspace identified for the Cargiant site (site 8) are only those that are envisaged to be delivered within the first 20 years of the Plan period, we consider that the Plan should acknowledge the work that has been done to date on a masterplan for the site, by recognizing that the site as a whole (during the Plan period and beyond) has a total capacity for a greater number of housing units and amount of commercial floorspace. Specifically, we would welcome recognition that the site is anticipated to accommodate at least 6,500 new homes and 125,000sq m of commercial floorspace in total.
42	555	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Places	P1	a), c)	The above comments on the site's allocation and capacity are also relevant to Part a) of this policy. Criteria c) is overly prescriptive in identifying where there should be concentrations of family and smaller units. This will be influenced by phasing as well as the physical characteristics of the different parts of the OOP masterplan, but we would suggest that this level of detail is best dealt with through the masterplan planning application.
42	556	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Places	P2	a), c), OON5	This is repeated in OON.5. Whilst we understand the desire to focus family units around open space and social infrastructure, we do not understand why smaller unitsshould be focused around a small business hub and consider this to be an unnecessary constraint.
42	557	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Places	P2	d),v). OON.9	Part d)v) of this policy requires existing floorspace used by 'creative businesses' in accordance with policy E1 to be re-provided. It is not clear here whether this requires re-provision of just the quantum and type, or the re-provision of the actual businesses themselves. We think neither is appropriate. This is repeated at OON.9, which furthermore identifies that the Rolls Royce Building provides an opportunity to accommodate this floorspace as well as having potential for meanwhile uses. We consider that this level of detail is more appropriately dealt with through a planning application.
42	558	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Places	P2	f), OON.11-12	Part f), as well as OON.11-12 (and TCC9) provide detailed policy requirements relating to meanwhile uses. Whilst the aims and benefits of meanwhile uses are understood, they are only appropriate in certain circumstances and need to be compatible with a range of detailed matters, including in particular site phasing, logistics, commercial viability and access routes which may change during the site's delivery. We do not consider that the level of detail provided on meanwhile use types and location in P2 and its supporting text is appropriate or necessary. The Local Plan should simply encourage and support meanwhile uses and seek a strategy for large sites which are likely to experience any considerable periods of vacancy. Meanwhile uses should not be given the same policy status as permanent uses, and should in no way compromise the proper long-term redevelopment of the area.
42	559	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Places	P2	k)	We would note that the Northern Viaduct solution for Hythe Road Station will make the sustainable drainage requirements in part k) more difficult to achieve.
42	560	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Places	P2	m)	Part m) of the policy relates to heritage and character and is similarly unclear as to recognizing that locally listed buildings can be lost with justification. Reference here is only to the Rolls Royce Building and to the setting of locally listed buildings.
42	561	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Places	P2	i)iv)	Part i)vi) requires development in OON to "support" a walking/cycling bridge to Wormwood Scrubs. Whilst this is supported in terms of providing access to open space, the Local Plan should specify whether this suggests delivering or simply facilitating the connection.
42	562	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Places	P2C1		The level of detail provided in the cluster policies is beyond what should be included in a Local Plan document, and would be more appropriately addressed directly through the determination of a masterplan planning application for the site.
42	563	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Places	P10C2		We are concerned that the requirement to provide a 'green bridge' linking Laundry Lane with Old Oak Gardens will impact on the OOP masterplan and will increase the impact of introducing a bridge at this point on the railway beneath. We would encourage this reference to be changed to a bridge, with the details to be left for a planning application.
43	616	Planning Consultant	Hannah Willcock	DP9 (on behalf of A40 Data Centre B.V)	Places	P4		In principle, we are supportive of the intention for Park Royal to remain as London's leading location for large, medium and small businesses. Whilst we agree that the area should continue to provide and protect a mixture of industrial uses, in the right location where sites that are providing SIL uses have been optimised, the OPDC should consider other complementary non-SIL uses to 'optimise development' as outlined in policy SP9.
43	617	Planning Consultant	Hannah Willcock	DP9 (on behalf of A40 Data Centre B.V)	Places	P4		Part b) of Policy P4 states that proposals should contribute "towards 3,800 jobs by taking opportunities to intensify the use of sites, having regard to the locations and typologies identified in OPDC's Park Royal Intensification Study." The Intensification Study page 35 under employment density states that

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								“where site conditions allow, stacking of small industrial spaces on larger spaces can maintain the ecology of businesses in Park Royal whilst growing the employment capacity of the area.” We believe that this is an extremely important point. The OPDC need to take into account that in practice sites coming forward with smaller footprints are unlikely to be able to do this above 2 storeys because of the associated servicing and loading requirements. In addition, multi-typology buildings will require more substantial structures, additional requirements for passenger lifts, loading lifts and vehicle ramps required to service buildings which may deter potential developers/investors and tenants due to the potential costs associated with these additional requirements. The study itself recognises that “in the UK, industrial developments of 2 storeys and above are still rare as it requires a very large site to achieve building cost economies of scale and very strong industrial rental values to cover the higher cost of building.” Whilst this might be the emerging intention for Park Royal, it is our view that providing 2 or more storeys of industrial floorspace will not be achievable on sites, unless they are of considerable size. However, it should be taken into consideration that in gateway locations next to transport links, other non SIL uses (subject to design and townscape considerations) could be considered acceptable above these SIL uses. By doing this, you would be maximising SIL floorspace on site in locations well served by transport connections and providing additional uses on top that would not jeopardise the SIL use but continue to generate employment which is a key driver for the OPDC in Park Royal.
43	618	Planning Consultant	Hannah Willcock	DP9 (on behalf of A40 Data Centre B.V)	Places	P4		PRW.5 on page 82 outlines that appropriate development which involve a more intensive use of land and deliver more jobs with SIL compliant uses will be supported in accordance with part b. As outlined above, we believe that where SIL uses are optimised on sites, other non SIL uses that could be provided above SIL uses should be considered in suitable gateway locations.
43	619	Planning Consultant	Hannah Willcock	DP9 (on behalf of A40 Data Centre B.V)	Places	P4	i)	Part i) requires that new developments should contribute towards and/or delivering improvements which support public access into and/or the quality of existing green infrastructure assets, including green corridors along railways and green spaces along the A40. We continue to be supportive of this and agree with the comments in the draft Local Plan (page 86) that the Park Plaza hotel on Western Avenue provides active frontage, but a greater degree of surveillance is required along its length. Any development proposal on the remainder of the Western Avenue site will take this into account and look to deliver improvements where possible.
44	632	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Places	P6C1		Greater emphasis could be given to the role of Central Middlesex Hospital as a major employer and catalyst for the regeneration in OPDC (see Policy P6C1 ‘ASDA Cluster’).
45	644	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Places	P2	a)	We support the objective to create a thriving, mixed use, high-density network of new neighbourhoods that contribute to the delivery of 5,100 new jobs and a minimum of 6,300 new homes including early development that contributes approximately 2,400 new homes to OPDC’s 0-10 year housing supply. 2 Scrubs Lane falls within Old Oak North and can make a significant contribution to these objectives.
45	645	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Places	P2		Furthermore, the neighbouring sites which form the Harrow Road Cluster could if combined could make an even greater contribution delivering a significant uplift in employment floorspace and new homes.
45	646	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Places	P10	a)	We support the objective to deliver a range of mixed use development along Scrubs Lane contributing to the delivery of 1,100 new jobs and a minimum of 2,000 new homes during the plan period including early development.
45	647	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Places	P10	c)	Furthermore, we support the objective to deliver attractive ground and lower floor employment floorspace on sites fronting Scrubs Lane consisting of ‘small business’ B1a, B1c, B2 and B8 uses along its length.
45	648	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Places	P10	c)	We would also add that retail uses could also be appropriate in this location.
45	649	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Places	P10	d)i)	We support the principle of delivering residential on the upper floors of buildings fronting onto Scrubs Lane and the railway lines to protect residential amenity.
45	650	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Places	P10	j)	It is acknowledged that the area is appropriate for a variety of building heights. However, a degree of flexibility should be applied to take account of the height of buildings being a North of the Gran Union Canal - 6-8 storey heights onto Scrubs Lane and 6-10 storeys onto Harrow Road is too prescriptive instead a degree of flexibility should be applied to the policy to take account of the fact that additional height can be justified where the public benefits of a scheme are significant.
45	651	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Places	P10	j)	We support the principle of a tall building on the corner of Scrubs Lane and Harrow Road. A significant amount of work has been undertaken on the emerging proposals for 2 Scrubs Lane with planning and design officers.
45	652	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Places	P10C1	a)	The Harrow Road Cluster is suitable for a range of land uses and we support this approach as set out in the draft policy. It is considered that the Cluster could deliver the following: • An uplift in employment space in the form of modern and flexible workspace suitable for a range of businesses including small businesses. • Re-provision of important community assets in the form of church, community and nursery uses. • A significant contribution to the OPDC’s housing targets for Scrubs Lane including market and affordable housing. • An outward looking approach to development tying in with the emerging Scrubs Lane masterplan proposals. • An attractive living environment with a good provision of public and private amenity space in addition to communal amenity space and landscaping of a high quality. • Active frontages onto Scrubs Lane, Harrow Road and the proposed Ellisland Way.

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								• Improvement of public realm on Harrow Road to support access to Harlesden town centre. • Publicly accessible open space on Ellisland Way to the south of 2 Scrubs Lane and at the entrance to Old Oak High Street.
45	653	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Places	P10C1	f)	We acknowledge the objective to conserve and enhance the Chandelier Building as a building of local heritage interest and continuing its use as B-use class employment floorspace. However, this approach would hamper the development potential of the Cluster from a construction logistics perspective. The Cluster site needs to be serviced and the only suitable location for the road junction would be within the boundaries of the Chandelier building. If the junction were to be to the north of the Chandelier building it would conflict with East's aspirations for a cycle route and the main Harrow Road / Scrubs Lane junction. If the junction were to be to the south of the building then highways sight lines would be obscured by the building itself and the bridge over the main tracks.
45	654	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Places	P10C1	f)	The construction logistics issues in combination with the significant public benefits that a masterplan for the Cluster could deliver would likely outweigh any harm caused by the loss of this building. It is therefore requested that the policy acknowledges these points. It could include some wording advising that whilst the building might not be retained, it could be replicated in some capacity elsewhere in the Cluster.
45	655	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Places	P10C1	HRC.3	Paragraph HRC.3 states that, "The City Mission Church and associated community uses provide important services to the local community which is reflected in their designation as an Asset of Community Value. To ensure the continued delivery of social infrastructure, the floorspace of these uses should be reprovided." This statement is incorrect. The nursery is the only part of 2 Scrubs Lane designated as an Asset of Community Value. This is confirmed in the decision notice issued by the London Borough of Brent. The decision notice concludes by stating, "The council is satisfied that the ground floor of the property (excluding the reception area) meets the provisions within the Act and that a partial listing of this part of the building should be made."
45	656	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Places	P10C1	HRC.8	We support the objective set out in paragraph HRC.8 to deliver a single tall building at the junction of Harrow Road and Scrubs Lane. This location is considered to support wayfinding to the retained community uses, Old Oak High Street and Harlesden town centres. Elsewhere in the Cluster a degree of flexibility should be allowed in terms of building heights to take account of the many competing factors when considering the acceptability of proposed building heights. As explained above, the Cluster has the capability of delivering significant public benefits which can justify additional height subject to detailed design and impact on townscape and heritage.
46	659	Planning Consultant	Mark Powney MRTPI	Boyer Planning (on behalf of Raban Goodhall Ltd)	Places			The aim of this written representation is to clearly evidence our client's site and adjoining properties are at odds with the surrounding residential area and through redevelopment could make a more significant contribution to the wider area in accordance with the aspirations of the Draft Local Plan. In this regard the evidence presented includes a comprehensive redevelopment area (Figure 1) incorporating 4 sites as follows – • Site 1 - FRI and associated buildings containing a low density residential development of 11 units with associated car parking and amenity space; • Site 2 - 80 Goodhall Street currently occupied by a double heighted standalone warehouse (B8 use class); • Site 3 - 86 Goodhall Street currently occupied by a small 5 unit industrial estate; and • Site 4 - Network Rail land adjacent to Old Oak Lane containing advertising hoardings.
46	661	Planning Consultant	Mark Powney MRTPI	Boyer Planning (on behalf of Raban Goodhall Ltd)	Places	P8		Based on the site's location at the northern gateway into Old Oak and its prominent frontage to Old Oak Lane we feel it should be viewed as a key Gateway Site. Also given its close proximity to Willesden Junction station (3 minutes' walk); Harlesden High Street and Atlas Junction Cluster (both only 5-6 minutes' walk); we strongly feel the site is suitable for a high quality mixed use development that provides much needed new housing; including additional affordable housing; that provides an active frontage to Old Oak Lane and increases the number of jobs on the site for key growth sectors.
46	662	Planning Consultant	Mark Powney MRTPI	Boyer Planning (on behalf of Raban Goodhall Ltd)	Places	P8		While we consider the redevelopment potential of our clients site is ignored we support many of the wider policy principles outlined in Local Plan Policy P8 including – • Supporting the delivery of a range of vibrant mixed use neighbourhoods; • Retaining existing residential uses; • Delivery of new town centre and employment uses along Old Oak High Street and within Atlas Junction neighbourhood town centre; • Active and positive frontages that help to activate the public realm on Old Oak Lane; • Mitigating impacts of SIL uses on the surrounding housing; and • The enhancement and expansion of Old Oak Community Gardens within the Island Triangle.
46	663	Planning Consultant	Mark Powney MRTPI	Boyer Planning (on behalf of Raban Goodhall Ltd)	Places	P8		What we are struggling to understand is why sites such as those around Old Oak Common Station and Wormwood Scrubs are being promoted for a mix of employment floorspace that is compatible with housing, including space for small businesses, and community facilities while our client's site located in close proximity to an equally important transport node is not promoted for redevelopment to maximise its potential for new homes and more intensively occupied employment floorspace.
46	664	Planning Consultant	Mark Powney MRTPI	Boyer Planning (on behalf of Raban Goodhall Ltd)	Places	P8		While we appreciate the area around Willesden Junction station is the subject of its own policy (P11 Willesden Junction); P8 makes limited mention of the significant investment being made at Willesden Junction station. This is a significant level of transport investment (culminating in an increased PTAL of 6a) directly adjacent to our client's site and the adjoining Ursula Laap Estate and is considered to underline the significant redevelopment potential of both sites. This is currently not recognised in Policy P8 neither is both sites importance as key Gateways from Harlesden Town Centre and Willesden Junction Station towards the proposed Atlas Junction Cluster; HS2 Old Oak Common Station; Old Oak High Street and East Acton.
46	665	Planning Consultant	Mark Powney MRTPI	Boyer Planning (on behalf of Raban Goodhall Ltd)	Places	P8		The vision for Policy P8 refers to new development having to respond to the area's complex context of the nearby Old Oak Common Station, HS2 construction sites, rail lines, Grand Union Canal and the area's residential heritage. Willesden Junction Station; whilst not within the area of P8 will have an equally important regenerative role to the sites in the northern areas of P8. Given it lies only 0.1 miles from our proposed comprehensive redevelopment site and the adjoining Ursula Laap Estate this should be referenced in Policy P8; as well as the positive influence these site; if redevelopment for mixed use; will have in bringing new Gross Development Value (GDV) and local spend into the nearby Harlesden Town High Street and the proposed Atlas Junction Cluster.

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46	666	Planning Consultant	Mark Powney MRTPI	Boyer Planning (on behalf of Raban Goodhall Ltd)	Places	P8		In essence we feel the Local Plan should recognise the redevelopment potential of our clients site having regard to its high PTAL; gateway location; and in recognition that the existing 4 individual sites offer a combination of low density housing and jobs. Comprehensive redevelopment of the 4 sites would result in addition housing across both private and affordable housing tenures; including 25% family (3+ beds) housing. Employment floorspace would also be reprovided as part of this high quality mixed use development that will be more intensively occupied and therefore increasing the number of jobs on this highly accessible site.
46	667	Planning Consultant	Mark Powney MRTPI	Boyer Planning (on behalf of Raban Goodhall Ltd)	Places	P8	j)	Now within the Regulation 19 version of the Local Plan under Policy P8 the FRI building is proposed for local listing. The Heritage Strategy (2017) now specifically mentions the FRI - '21. Former Railway Institute, Goodhall Street, NW10 6TT – key building of local interest that has a strong physical presence and which represents its former important social function. Significantly altered to the rear but capable of repair and re-use.' This reference appears to continue the line from the LB of Ealing Old Oak Lane Conservation Area Appraisal (March 2007) regarding the FRI being at risk of demolition and redevelopment on the basis of it being vacant and falling into disrepair. The site has now been refurbished for residential accommodation and therefore has been repaired and reused." The Heritage Strategy should be updated to reflect this fact.
46	668	Planning Consultant	Mark Powney MRTPI	Boyer Planning (on behalf of Raban Goodhall Ltd)	Places	P8	j)	Given the need for new housing; especially in key growth areas such as Old Oak; our client is considering redevelopment options for the FRI site. The site could feasibly accommodate an increased level of housing by way of the site currently having a relatively low plot ratio resulting from surface car parking and significant ground floor amenity space. As mentioned the current residential density is only circa 70 units per hectare; well below what would be expected for a site that has a PTAL rating up of 4-6a.
46	669	Planning Consultant	Mark Powney MRTPI	Boyer Planning (on behalf of Raban Goodhall Ltd)	Places	P8	j)	Demolition of all existing buildings on the site; including the FRI building; would assist in optimising the redevelopment potential of the site and provide necessary amenity space by way of balconies and roof gardens. Demolition of the FRI building is also considered more effective from a viability perspective due to the significant refurbishment costs to bring the FRI building up to modern standards. While the FRI building and rear properties were only refurbished and converted within the last 10 years the implemented low cost housing scheme was marginal in terms of viability and required grant funding.
46	670	Planning Consultant	Mark Powney MRTPI	Boyer Planning (on behalf of Raban Goodhall Ltd)	Places	P8	j)	While this scheme helped secured the building's short term future and brought a long term vacant building back into productive use; the building still requires significant investment to improve the current accommodation including - · No wheelchair access; · No lift; · Only one means of escape; · 25% of the residential units are single aspect; · Some of the units have blind bathrooms with no windows; · Most of the kitchens are integrated with living rooms; and · The rubbish disposal is located within a separate self-contained building which has been subject to malicious fires
46	671	Planning Consultant	Mark Powney MRTPI	Boyer Planning (on behalf of Raban Goodhall Ltd)	Places	P8	j)	The cost of undertaking these upgrades to the FRI building are considered prohibitive without being able to provide more housing on the site to help cross subsidise these necessary improvements. Given the footprints of the existing buildings and issues such as meeting amenity space requirements; maintaining privacy; access and right to light considerations; it would difficult to increase the number of units significantly on the site to make these upgrades to the FRI viable.
46	672	Planning Consultant	Mark Powney MRTPI	Boyer Planning (on behalf of Raban Goodhall Ltd)	Places	P8	j)	Therefore to deliver a viable scheme on the FRI site; which maximises the site's high PTALs; and has due regard to existing residential amenity and conservation area considerations; it is considered necessary to demolish the FRI building.
46	673	Planning Consultant	Mark Powney MRTPI	Boyer Planning (on behalf of Raban Goodhall Ltd)	Places	P8	j)	Retention of the FRI building is more likely however if the FRI site is comprehensively redeveloped alongside the 3 adjoining sites outlined in Figure 1. This would enable a larger scheme to help cross subsidise the necessary works to the FRI building and therefore secure its long term future.
47	683	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Places	P1		The Council considers that the proposed designation of Old Oak High Street as a "Major Centre" is appropriate. This reflects the scale of the wider development. The safeguards set out within Chapter 10 should ensure that the scale of town centre development will not have a significantly detrimental impact on the vitality of adjoining centres in this borough.
47	684	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Places	P3		In Policy P3 Grand Union Canal subsection o) i) there is a typo "twith".
47	685	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Places	P10		The subsection Public realm and movement f) iv) should include providing access to Kensal Canalside Opportunity Area to fulfil the Duty to Cooperate.
47	686	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Places	P10		Within the Scrubs Lane Place Policy P10, the text "Kensal Canalside" should be added to the end of P10 (f) (iv) to ensure that future development in the area contributes to and does not prejudice the future delivery of road (and bus) link from Scrubs Lane to Kensal Canalside.
47	687	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Places	P10		I note there is a reference to improving connections to Kensal Canalside within the supporting text (cf. SL6). This should be reflected in the wording of the Policy.
47	688	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Places	P10C3, P10C4		Within the subsections on Building heights e) we have concerns about the impact of the proposed single tall buildings on Kensal Green Cemetery which is a Grade 1 Listed Historic Park and Garden containing 152 listed buildings and monuments. The evidence base documents do not explain how a single tall building is justified in each of the clusters beyond promoting "local legibility", which could be achieved with signage, and being preferable to having multiple tall buildings in each cluster. The strategic views assessment has apparently tested 10 and 18 storeys but this assessment will not available until the Scrubs Lane SPD is produced and all the Local Plan evidence base documents are silent on how tall the single tall buildings will be. It is disappointing that the massing model shows the impact on Wormwood

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								Scrubs but not the cemeteries which are closer. We appreciate that these comments are now largely academic since planning permission has already been granted for some sites but must question the robustness of this evidence base. We think that clear evidence that taller buildings are justified in the Scrubs Lane Character Area is required before this principle is set.
49	743	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Places			Park Royal is home to the largest concentration of industrial businesses in the UK and its proximity to Central London, Heathrow airport, as well as access to a skilled workforce, means that Park Royal is characterised by a very high demand for industrial space. However, the limited supply of land for redevelopment has already pushed some businesses to relocate somewhere else. The barriers to local growth caused by a lack of additional industrial shed capacity coming on stream is further amplified by the building of housing on industrial land in the wider West London area, the need to decant businesses from HS2 CPO land in the Victoria Rd area, as well as Car Giant and wider Old Oak areas in due course. PRBG recognises that a more efficient use of the land through intensification is the solution to Park Royal's industrial land shortage and broadly supports the recommendations set in the Local Plan and Intensification Study as far as it goes. We note the positive financial viability of a large number of the long listed 'case study' sites.
49	744	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Places	P4		However, the Group has identified a series of issues that have not appear to have been fully addressed relating to intensification: - We are yet to be convinced (given existing high demand for industrial space in Park Royal and displacement of significant numbers of businesses mentioned above) that the long list in the Intensification study, let alone the Site Allocations in the Local Plan, are sufficient to meet present and future demand for industrial sheds. Of course, we recognise that this is a London-wide problem and other SIL areas (not just Park Royal) must contribute to addressing this through intensification.
49	745	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Places			We believe it is in the public interest that suitable sites for land assembly, backed up by CPO powers if required, are identified. Land release from HS2 is a long way off and we need an accelerated programme of industrial intensification commencing in 2018, so that those businesses can be relocated. We will support efforts to convene larger private sector land owners (including institutional investors) in late 2017/ early 2018 and test whether the private sector capacity exists to progress land assembly, particularly where large land parcels abut each other. If this is unsuccessful it may then be that the public sector/ OPDC will need to take a more interventionist role.A1502
49	746	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Places			A Park Royal Supplementary Planning Document might usefully scope out a high level 'master plan' for the estate (specifically identifying opportunities to assemble sites and intensify), as well as to set out OPDC's approach to yard space provision for HGVs to load/unload in Park Royal to ensure that provision is adequate and well designed.
49	747	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Places			We note that 500 housing units are proposed on the ASDA Park Royal site which falls outside the SIL area. We welcome that development on this site, incoming uses, "should not cause harm" or impact on businesses in the SIL. Employment uses within the ASDA site should act as a buffer, but we would suggest if the ASDA site is not to be designated as SIL, then the local plan should specifically require any development maximises delivery of new industrial space as part of the retail, residential, commercial mix.
49	748	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Places			PRBG also recommends that the local plan should explicitly support, perhaps in the narrative, piloting the first 3+ storey shed in the UK on a suitable part of Park Royal.
49	749	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Places			We welcome that there are no specific design requirements other than height. ODPC should devise and maintain flexible policies that take account of the rapidly evolving technical and operational needs of urban logistics and other tenants of industrial sheds (e.g. acknowledging some tenants needs to vehicle parking inside and outside buildings; tenants differing needs for mezzanine designs). We would welcome exploring the development with OPDC of a resource similar to the LLDC Employment Space Study.
49	761	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Places	P4		As we set out in our previous consultation response PRBG supports the idea of creating a 'Heart of Park Royal' as a vibrant hub, with retail, leisure, health and entertainment facilities. This would also be a suitable location for flexible, affordable office space suitable for start-ups and SMEs and spaces suitable for business meetings and networking. Alongside this central hub, there is also a need for local hubs offering eating and meeting facilities, supported by better wayfinding across the estate. The large HGV-friendly street signs on the Slough trading estate should be learnt from. Outside the scope of the OPDC local plan area, but still a part of Park Royal, the Ace Café on the Western edge of Park Royal also has a role as a local hub.
50	767	Statutory Consultee	Ben Llewellyn	Environment Agency	Places	P3	l)-m)	We recommend that this policy is amended to reference the Water Framework Directive classification of the Grand Union Canal and the absolute requirement for the changes to OPDC not to result in deterioration of the waterbody.Each water course, including the GUC is designated under WFD giving an overall status (updated in the Thames River Basin Management Plan 2015-2021). WFD requires the UK to prevent deterioration of the status of surface water bodies and groundwater bodies and, through the River Basin Management Plan, identifies the actions and measures needed to prevent deterioration and to improve the status of all water bodies. Please note that was not mentioned in our response to the Regulation 18 Consultation as there were direct references to the Thames River Basin Management Plan for the River Brent and improvements to the Grand Union Canal in Policy EU3. We recommend that this version of the plan is strengthened by referencing the requirements in bullet points L and M and by including the improvement measures in the Infrastructure Delivery Plan. We would be happy to review any proposed minor modifications to policy wording or to suggest some policy wording if this would be useful.
50	780	Statutory Consultee	Ben Llewellyn	Environment Agency	Places	P3		We agree that the Grand Union Canal (GUC) is a valuable asset to OPDC and this is acknowledged throughout the Local Plan. Specifically the importance is referenced in policies P3 Grand Union Canal, EU3: Water and in the Integrated Water Management Strategy. We do however think that improvements could be made to these sections which would make the Local Plan even stronger. Our primary concern is in relation to European Directive 2000/60/EC the Water Framework Directive. Under the Water Framework Directive the GUC is classified as a waterbody. The Water Framework Directive requires appropriate authorities such as the Environment Agency and Local Planning Authorities to ensure that no waterbody deteriorates in quality. It is our view that The Water Framework Directive could play a stronger part in the relevant policies of the Local Plan. We are keen to work with OPDC on some minor modifications to the Local Plan between now and Examination in Public to strengthen the plan in this respect. We recommend that River Basin Management Plan improvement measures and projects should be delivered through the transformation of OPDC. This could be achieved by including projects which would improve the GUC within the Infrastructure Delivery Plan (IDP) so that

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								Community Infrastructure Levy monies can be directed to and provide funding for the projects. We have provided more detailed comments on this matter below and provided a schedule of projects with indicative costs as appendix 2 [Table of Water Framework Directive Improvement Measures for the Grand Union Canal] to this response. Paragraph 165 of the NPPF promotes Planning Policies drawing on River Basin Management Plans and we feel that the Local Plan and relevant evidence base documents could be added to ensure that this is achieved. The Local Plan and Integrated Water Management Strategy both heavily rely on adjustments being made to the Grand Union Canal in order for it to provide attenuation and conveyance for surface water flows. This is required due to the lack of capacity in the Thames Water mains sewer network. We principally support this aspiration as utilising an existing watercourse for clean water discharge is considerably more sustainable than discharging to sewer. We would like to work with OPDC and the Canal and River Trust to understand what these modifications may look like and to advise on any mitigation measures required to ensure compliance with the Water Framework Directive and that the legal requirement of 'no deterioration' is met.
52	786	Local Resident	Praveen Anand		Places	P4, P5, P6		Firstly for the record many property on adhoc basis are being converted from warehouse to shops, retail restaurants, Shisha Bar and residential without any proper coherent enforcement by Ealing Council or OPDC. This prevails worst on Park Royal Road NW10 where this road is used as a cut road link between A406 and A40 (west) many times even buses motorbikes do not observe the 20mph limit. There many retail unit opening and many warehouse changing use to Garages and retails in this park of Park Royal which attract more traffic with and proper parking provisions or traffic speed control. Further if is most difficult for predestined to cross as the only safe provisions are at Victoria Road or junction with Asda. Nothing in the OODC consulting which addresses these main issues. In the vicinity of North Acton many more residential unit are being built without any provision to support the infrastructure such any post office, banks, letter boxes, doctor surgeries even the existing tube station can not cope as the platforms are too small. More effort is need to to link central london and harrow (Northwick park hospital) from the new residential hotspots. Generally more lack focus infrastructure and transport links, road safety and planning enforcement
53	789	Local Authority	Nazia Idries	Health and Wellbeing Board - London Borough of Ealing	Places	P8		Support much of what is proposed in the plan including the new 'clusters' approach, but while I understand the need to set out a long term vision and plan, many local residents in the Island Triangle and in Old Oak Lane & Old Oak Common Lane 'place' are frustrated at the lack of any obvious early improvements being made around Old Oak Lane. The perception within the Island Triangle is overwhelmingly that the area has deteriorated since OPDC was established. Ealing have seemingly lost interested in the upkeep and providing services to the area since the arrival of OPDC - the public spaces, streets and pavements are dirty and deteriorating, the drainage is poor, there is a lack of greenery and general upkeep is significantly worse than in the past. There is now a sense of underinvestment in the area, not present elsewhere in the borough. A renewed focus on the near future and meanwhile uses would be much appreciated by local residents and I support those policies that encourage early activation of retail and leisure and meanwhile uses – particularly those that involve greening and public space improvements. You should consider scope for a 'short term improvements strategy for the existing community' for the Old Oak Lane & Old Oak Common Lane Place to complement the longer term Local Plan vision. There are after all several sources of money around not least HS2 and the Mayor of London as well as developers.
54	790	Local Resident	Victoria Hollertz		Places	P2	x)	Strongly support this policy, and all sub policies except P2 x) As believe the large waste sites need to be encouraged to move on at the earliest opportunity. They are disproportionately large/polluting to sit alongside other proposed uses (more detail below).
54	791	Local Resident	Victoria Hollertz		Places	P2	OON11-12	Particularly Support text in OON11 and OON12 which look to activate the area from Atlas Rd in towards the future high St. and promotes meanwhile uses.
54	792	Local Resident	Victoria Hollertz		Places	P2	OON18	And support OON18 – good to see a target for new green space. This is really lack in the north of OPDC area currently.
54	793	Local Resident	Victoria Hollertz		Places	P2	OON24	Support OON24 and protecting heritage.
54	794	Local Resident	Victoria Hollertz		Places	P2	OON30	I question OON30 - I can't see how new development is going to prevent pollution from the likes of Powerday? Unless this is saying development will eventually push them out of Old Oak or turn the site into something smaller and cleaner that only served the local OPDC community – the first of these options would be preferable. The second might be palatable.
54	795	Local Resident	Victoria Hollertz		Places	P8	V3	support this vision
54	796	Local Resident	Victoria Hollertz		Places	P8	a)	support – vibrant mixed use neighbourhoods and proposed Atlas Junction neighbourhood town centre
54	797	Local Resident	Victoria Hollertz		Places	P8	e)	improvements to Old Oak Lane, should be particularly focused on improving public realm for walking and cycling and slowing/deprioritising vehicle movements. The bridge from Old Oak Lane north over to Willesden Junction/Station Road in Harlesden is a heavily used pedestrian route and yet the pedestrian environment (and for cyclists) is unpleasant and very polluted. The road is wider than it needs to be over this bridge, more space could be given over to pavements, cycling and planting. A green buffer between pedestrians and the road would be welcome here. Pedestrians are currently forced into very close proximity to road vehicles and their pollution, due to lack of alternative route to Willesden Junction Station from Old Oak Lane. This could be an improvement delivered early – e.g. large planters and extended pavement/separate cycle lane over bridge, narrowed road. This would slow vehicles also which currently speed over bridge and down onto Old Oak Lane.
54	798	Local Resident	Victoria Hollertz		Places	P8	f)	The route into the Channel Gate area should be via Atlas Road and a bridge over the canal (HS2 could provide this as are planning a bridge into the Channel Gate/Euroterminal from Atlas Rd). Channel Gate Road currently carves historic Goodhall Street in two. Old street pattern should be restored with Goodhall St being dominant over Channel Gate Rd. Channel gate Rd could be pedestrianised to form a fantastic new local public/green space for local homes and new businesses in Channel Gate SIL area.

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54	799	Local Resident	Victoria Hollertz		Places	P8	h)ii)	Strongly support this policy to expand Old Oak Community Gardens. These currently provide a much needed buffer between residential and industrial. This buffer needs to be wider than it is currently. This policy would support that. You would get lots of local support for this. Could this policy be delivered early (with help of HS2 perhaps and their community funds? Or other means)
54	800	Local Resident	Victoria Hollertz		Places	P8	h)iv)	strongly support new green spaces at Atlas Junction – this area has a shortage of green space.
54	801	Local Resident	Victoria Hollertz		Places	P8	h)vi)	Strongly support linear green spaces and new walking and cycling orientated streets throughout Old Oak Lane/Common Lane and Victoria Rd.
54	802	Local Resident	Victoria Hollertz		Places	P8	i) i)	Air Quality – support this, but needs to be stronger. Powerday at Old Oak Sidings do not and cannot deal with their offsite environmental impacts. They have never and will never get this under control as long as their operation is at this large scale and current processes. Part of the problem is Powerday rarely accept or acknowledge to residents that there is an issue. But if you ask any local they will know the distinct odour, and comment on how generally unpleasant the air is in the general vicinity. This includes Willesden Junction Station and the new proposed Old Oak high street. Any suggestion that Powerday could increase the amount of waste they handle would be disastrous for local residents and their health. Living in the area it is very hard to see how it is possible to consider plans for residential, or ‘cleaner’ commercial development anywhere near the site and particularly to the east of the site - which is downwind 70% of the time. The odour, dust and poor air caused by Powerday is unescapable around Old Oak. I'm not confident OPDC fully understand or are aware of quite how much Powerday blights the local area. Regulation of the site has largely failed despite some strong efforts from the authorities, any improvement is always temporary lasting only until the next prolonged deterioration in local air quality, dust and odour.
54	803	Local Resident	Victoria Hollertz		Places	P8	i)ii)	Strongly support measures to improve air quality along Old Oak Lane and particularly to reduce impacts of local waste industries which blight the area. Please bring measures forward early. The local community is really struggling with this aspect of life in Old Oak. Local Councillors are aware, but struggling to find a solution.
54	804	Local Resident	Victoria Hollertz		Places	P8	k)iv)	Strongly support this policy of lower building height near Old Oak Lane/Island Triangle – there needs to be a buffer around the Island Triangle area to protect it from the effects of the larger scale development and to preserve the heritage value. Where possible this should be a green buffer or at least lower building heights to help make the transition to taller buildings less pronounced.
54	805	Local Resident	Victoria Hollertz		Places	P8	V1	strongly support the vision. This junction is currently dominated by road vehicles including HGVs. Would support measures to redress this balance and make the space more pedestrian and cycle friendly and measures to improve air quality here.
54	806	Local Resident	Victoria Hollertz		Places	P8C1	AJ.7	Support Text
54	807	Local Resident	Victoria Hollertz		Places	P9	e)	Strongly support Policy to activate area for meanwhile uses - The local community are keen to see some benefits of development plan delivered early.
54	808	Local Resident	Victoria Hollertz		Places	P9	f)	Retaining strategic Freight designation – If this is to be the case – there should be improved noise and air quality mitigation and screening to reduce impact on existing residents of the Island Triangle and future businesses in Channel Gate.
54	809	Local Resident	Victoria Hollertz		Places	P9	g)ii)	As the Old oak are will have better permeability – there will be more route options east-west – this will take some pressure off Old Oak Lane. While it's clear this will still be a major through route, you should consider giving Old Oak Lane less of a major A-road feel, perhaps focussing on traffic calming and improving cycling and walking along this route.
54	810	Local Resident	Victoria Hollertz		Places	P9	CG.5, CG.8-9	The supporting text particularly CG.5 the sentiment to move access to the Euroterminal freight area away from channel gate road to improve the Island Triangle and CG 8 and 9 includes sensible improvements.
54	811	Local Resident	Victoria Hollertz		Places	P11	d)	should include public realm improvements for pedestrians walking between Willesden Junction via Station Approach over bridge to Old Oak Lane
54	812	Local Resident	Victoria Hollertz		Places	P12		support this vision
54	813	Local Resident	Victoria Hollertz		Places	P11	WJ.11	should include public realm improvements for pedestrians walking between Willesden Junction via Station Approach over bridge to Old Oak Lane
55	818	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Places	P7		SEGRO owns two significant industrial estates within the Old Oak area: Victoria and Westway. These sites are proposed to be released from the SIL designation, and allocated for residential-led redevelopment within the draft Local Plan. The Victoria Industrial Estate (site 14) is allocated for a minimum of 1,100 homes, and circa 6,500sqm commercial floorspace. The estate is located within the North Acton and Acton Wells area, and so is subject to draft Policy P7 which focuses on new development in this particular location of OPDC. Development here is proposed to be high density, with tall buildings being delivered in appropriate locations such as alongside railway lines. The promotion of tall and high density development at the site, and reference to a minimum rather than target/maximum number of homes is supported. SEGRO believes that where industrial land is released to alternative uses for the purposes of achieving strategic regeneration objectives, then the new development should be maximised to make as effective use of the land as possible.
55	819	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Places	P8		The Westway Estate (site 22) is allocated for a minimum of 1,400 homes, and circa 7,700sqm commercial floorspace. The estate is located within the Old Oak Lane and Old Oak Common Lane area, and so is subject to draft Policy P8 which focuses on new development in this location of OPDC. Under draft Policy P8 tall buildings will also be suitable alongside railway lines. As per the proposals for the Victoria Estate, the promotion of tall and high density development at the site, and reference to a minimum rather than target/maximum number of homes is supported for the reasons set out above. SEGRO notes that both draft Policies P7 and P8 refer to the delivery of physical and social infrastructure, such as new public realm and green space, alongside new housing and commercial uses. The need for such supporting infrastructure is acknowledged, but OPDC should ensure that it is balanced against the timely delivery of new development for it to be realised.
55	820	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Places	P7, P8		Both Victoria and Westway have very high occupancy rates and are currently operating successfully as industrial estates. The estates accommodate businesses from a broad mix of sectors including TV, film, media, food, beverage and local service companies. The unit sizes that these businesses operate from are also varied, and this mix includes a large number of small/medium sized enterprises. The existing use values of these estates are relatively high, and in the context of future urban logistics trends, are likely to increase over time. This,

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								together with the costs and complexities associated with tenant decant, means that viability will be more important on these sites than perhaps other sites in the area which have already been obtained for the purpose of redevelopment for an alternative use.
55	822	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Places	P7, P8		Another key challenge in the delivery of these two site allocations is the ability to provide new industrial space within the OPDC area, so that existing businesses at the estates can be decanted into new premises. Decant is a critical prerequisite of delivery, and so it is important that the Local Plan provides for relocated business to ensure that the residential-led schemes come forward as planned, and more broadly to ensure that the core regeneration objectives of the Plan are achieved. Further commentary on the need for OPDC to plan for the decant needs of these estates is set out in the response to Draft Policy E1
55	823	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Places	P4, P5		SEGRO owns a number of industrial sites within the Park Royal SIL area of the OPDC. These sites are located within the 'Park Royal West' and Old Park Royal clusters, where Draft Policies P4 and P5 are relevant. A core objective of the Plan is the protection, intensification and strengthening of the Park Royal SIL. As commented above in relation to the 'Spatial Vision' chapter, this is supported by SEGRO. To ensure that this core objective is achieved, the policies proposed in the 'Places' chapter should, in SEGRO's view, provide a clearly defined spatial vision, together with proposals which seek to actively promote and facilitate the delivery of industrial intensification.
55	825	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Places			As mentioned above in relation to the Victoria and Westway Estates, capacity for new industrial development is not only a key constraint for industrial intensification, it is also a prerequisite of residential-led development on existing industrial sites outside the SIL which will need to be decanted. This further reinforces the need for new industrial development to be appropriately planned for within the Local Plan. Overall, SEGRO believes that a bold shift in policy and approach is needed from OPDC to actively promote and facilitate new industrial development under a clearly defined spatial vision, as without such stewardship from OPDC it seems likely that the current trend of very limited levels of intensification will continue.
56	859	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Places	P1	iv-v)	iv) and v) use the term 'appropriately responding' which is quite vague in its application. We consider 'sensitively respond' to be more appropriate, which would feed into the height and design of any scheme. Suggested change to text: Delete 'appropriately responding' and replace with 'sensitively respond to...'
56	860	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Places	P1C1		General comments: Public open spaces and station squares should promote natural green landscaping, trees etc. where possible rather than swathes of hard surfacing. Tree lined routes can help promote legibility. Any opportunity to provide green landscaping should be maximised to create more attractive environments and where it does not impede pedestrian movement etc. Materials for public realm improvements must be agreed with the Boroughs where proposals impact on or near the borough's highways. Maintenance and management plans for public open spaces must be agreed with the boroughs and any proposals should not place any additional burden on the Local Authorities limited budgets.
56	861	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Places	P1C1		Station needs to carefully design in ample cycle parking which is located within the station envelope or as close as possible to encourage cycling. This must be a priority if car free development is to be promoted at Old Oak.
56	862	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Places	P1C1	m)	'Supporting the integration of the station with surrounding areas by ensuring it is designed to be resilient and adaptable (QUALITY AND APPEARANCE) to respond to a surrounding changing context including the Elizabeth Line Depot and sidings, Intercity Express Programme Depot facilities...' This needs to be about quality too as any proposal for development has to factor in the Crossrail depot located in the middle of all this is tasked with a huge constraint.
56	863	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Places	Para OOC.7		LBHF is concerned that HS2 have only modelled the capacity for the station and not the numbers for the regeneration of the wider area. Therefore, the text needs to include reference to the fact that HS2 Station design (internal) and surrounds (external area) must address and support the growth in population; the regeneration ambitions of the Local Plan which will connect the station to new overground stations and improved connectivity to North Acton, Willesden Junction and East Acton stations - and the significantly higher number of people potentially using the station.
56	864	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Places	P2		The Policy includes the following under bullet point (q): "Making efficient use of Old Oak Sidings by supporting and/or enabling the site to deliver an energy from waste facility that contributes to a decentralised energy network for the wider area". It is stated in the supporting text (Para OON.30) that "To ensure existing and future residents are not negatively impacted on by the functioning of the waste site, appropriate measures should be demonstrated and implemented within new development to mitigate environmental impacts through design, delivery and operation". There is concern that the policy commitment to the inclusion of energy from waste is premature given that no assessments of the requirements of such a proposal or the potential impacts has been carried out or included as part of the Local Plan consultation. Also, the commitment that appropriate measures should be included in new developments to mitigate potential impacts would appear to inadequately consider the potential impacts on existing residents. Overall, there are currently doubts about how appropriate a location the OPDC Area is for energy from waste schemes.

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56	865	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Places	P2		The EMR waste management site sits within Old Oak North and is allocated in OPDC's Local Plan for re-development with the potential for 1,200 homes and 1,530 jobs. However, there appears to be no mention of OPDC's plans to relocate the EMR waste management site within strategic policy P2 for Old Oak North. Given the early relocation of the waste site is necessary to facilitate regeneration of this site and the wider area, it is considered important that reference to this is made in Policy P2. It may also be helpful to make reference to Policy EU6 on waste. The safeguarded status of the Old Oak Sidings (Powerday) site should be included as a point under the 'Land Uses' section of Policy P2. Suggested change to text: Include a new point under the 'Land Uses heading of Policy P2 as follows:- I) Safeguarding the Old Oak Sidings (Powerday) site for waste management purposes
56	866	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Places	P11		LBHF supports the development and timely delivery of Willesden Junction.
56	867	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Places	P12		LBHF supports the retention of Wormwood Scrubs as Metropolitan Open Land and the role of the Scrubs as a District and Metropolitan park for all.
56	868	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Places	P10 C4		Building heights: f.i. This location is considered to be too sensitive with regard to impact on surrounding heritage assets for a tall building and high density on the eastern side of Scrubs Lane and along the canal. The supporting text reads: MC.8. Delivering a single tall building at 115-129 Scrubs Lane is considered to be appropriate in principle, subject to detailed assessment of its impacts in accordance with all relevant policy and guidance. This location is considered to support wayfinding to the destination canalside uses, the east-west routes and from the south. Tall buildings are not the only way to mark important locations/junctions and to support wayfinding. In this case, Mitre Bridge would be the important and characteristic landmark and to help wayfinding.
57	959	Local Resident	Scott Cawley		Places	P12		Building apartments blocks, towers and office blocks around the edge of the Scrubs will change (and damage) the nature of Scrubs itself. So you will be staying true to the letter of the law - protecting the land there - but not staying true to the spirit of what the Scrubs is. The quiet and peaceful scrubland, a calm and reflective space in a busy part of London, a haven for wildlife - will all be damaged and completely changed once apartment blocks are built at the train depot site, overlooking the overgrowth. How will wildlife survive there when people are out on their balconies on summer days having loud parties and music, and when the whole park is ringed and lined with streets and boulevards? Dog walkers, kite and aeroplane flyers and joggers will all get short shrift from commuters cutting through the Scrubs once a major mainline train station is opened up to this green space. There is an incidious creep of development around the fringes of the scrubs - the temporary school, a potential football stadium on the site of the Athletics track, Overground lines and viaducts... and all the OPDC developments. The Scrubs will be badly affected if there is development not only *on* it, but *near* it.
57	961	Local Resident	Scott Cawley		Places	P11		The other negative effect on Harlesden will be the siting and direction of the new "High Street" in the OPDC area. At one point it was suggested it would get to Willesden Junction train station and flick westwards, joining Station Road. The most recent local plan however states that the new street will now flick eastwards and connect at the Harrow Road/High Street/Furness Road junction. It was explained that a) this is easier to achieve b) the route into Harlesden town centre is the same distance by either route. The latter is not true - a simple Google Maps measurement shows it is 150m more to walk to the Jubilee Clock from the Harrow Road exit of Willesden Junction station than it is to walk via Station Road. Even if you don't count the Jubilee Clock as the centre of Harlesden (really, it should be, as this is within the pedestrianised shopping area in the centre of the town centre), then the nearest possible place you could call the town centre - outside the Royal Oak pub - is still 100m further via Harrow Road than if walking via Station Road. The clue is really in the name - Station Road.
57	962	Local Resident	Scott Cawley		Places	P11		Furthermore, it was suggested that development opportunities could be greater on the part of Harlesden High Street that leads into the Town Centre, rather than via Station Road as the latter is quieter and holds fewer commercial opportunities. I would find this highly questionable - the former stretch of High Street is a short parade of shops, followed by long stretch of poor quality mix of residential buildings and commercial premises. In the unlikely event these were all to be changed into commercial premises, would the neighbours in the residential streets which back onto these potential commercial developments be happy with the increased noise? Also, surely this much commercial redevelopment would negatively detract from Harlesden Town Centre? And in favour of Station Road - it is a shorter route, so with fewer neighbours to disturb should redevelopments need to take place, however there is a higher quality parade of shops here already, plus there has been a suggestion the Royal Mail sorting office could be redeveloped in future - a large site offering huge potential. Last but not least, the route via Station Road links with Harlesden in its most natural place - the parade of shops in the pedestrianised centre at the Jubilee Clock. The OPDC have said this would be a complicated route to achieve - but the point of the redevelopment in the area is that it should be significant, complicated, once in a lifetime changes to make the area better. If that means a complicated connection to the new High Street on Station Road, then so be it, it will result in a better experience for those using Station Road.
61	980	Local Resident	Ron Thorp		Places	P7C2		Dull and dismal in the extreme.
62	991	Local Resident	Douglas Hunt		Places	P5		Current plans are to widen Victoria road and to take 50% of Cerebos Gardens in order to widen the road. As part of these plans the trees currently there will all be cut down. Once the building work is complete, can the remaining 50% of Cerebos Gardens please have trees re-

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								planted and other plants added e.g. low bushes. This will help with air pollution on a busy road, partially block out noise to the residents living in Shaftesbury Gardens and help with privacy. If the road is not widened, can bushes or other plants be added to help with air pollution.
66	1004	Unknown	Raymond Gill		Places	P3		P3 is positively prepared and legally compliant. (No justification provided)
67	1005	Strategic Partner	Nigel Myhill	London North West Healthcare NHS Trust	Places	P6		The Central Middlesex Hospital (CMH) area is shown on page 92 as key public accessible open space, but the building is owned and operated by a Private Finance company under a PFI agreement and as such is private property. CMH also has non PFI land (owned by the NHS Trust) at the rear which is currently not required for NHS use in the longer term, so consideration of other uses may be worth looking at. Perhaps additional residential or Open public Estate usage?
67	1006	Strategic Partner	Nigel Myhill	London North West Healthcare NHS Trust	Places	P6C1		P1C1 is sound. (No justification provided)
68	1020	Community Group	Martin Cain	Friary Park Preservation Group	Places	P1		Policy is sound (no justification provided)
68	1021	Community Group	Martin Cain	Friary Park Preservation Group	Places	P1C1		There is considerable opposition to spending £108 billion on the a new high speed rail line (HS2) from London to Birmingham and the delays in redeveloping existing Crossrail stations have raised doubts about building the proposed new station.
68	1022	Community Group	Martin Cain	Friary Park Preservation Group	Places	P3		There is no information about funding developments on the Grand Union Canal.
68	1023	Community Group	Martin Cain	Friary Park Preservation Group	Places	P4		The Park Royal industrial area will be affected by the latest ecological software biotope-focused planning tool Green Space Factor despite its surface ratings not being in agreement with scientific knowledge with respect to storm water management, biodiversity or aesthetics.
68	1024	Community Group	Martin Cain	Friary Park Preservation Group	Places	P4C1		Policy is sound (no justification provided)
68	1025	Community Group	Martin Cain	Friary Park Preservation Group	Places	P7		Policy is sound (no justification provided)
68	1026	Community Group	Martin Cain	Friary Park Preservation Group	Places	P7C1		Policy is sound (no justification provided)
68	1027	Community Group	Martin Cain	Friary Park Preservation Group	Places	P7C2		Again the lack of commitment by the government to funding is the concern.
68	1028	Community Group	Martin Cain	Friary Park Preservation Group	Places	P8		Policy is sound (no justification provided)
68	1029	Community Group	Martin Cain	Friary Park Preservation Group	Places	P8C1		Policy is sound (no justification provided)
68	1030	Community Group	Martin Cain	Friary Park Preservation Group	Places	P11		Policy is sound (no justification provided)
68	1031	Community Group	Martin Cain	Friary Park Preservation Group	Places	P12		The lack of detail about monitoring to ensure continued biodiversity makes this narrative unsound
70	1078	Local Resident	Joanna Betts		Places	P8		1.1 Wells House Road Residents Association, an association of residents, that represents the interests of some 400+ Wells House Road residents and landlords directly affected by construction and development from the OPDC Local Plan proposals as well as the HS2 Old Oak Common interchange construction. 1.2 Wells House Road is a triangular cul-de-sac of around 125 Edwardian homes of which 45 are occupied by people who have lived in the street for 25-70 years. At least ten homes are occupied by the children of the original residents and many are caring for elderly parents in these homes. It is a culturally diverse and integrated street. In short, this is a traditional family community that has a strong desire to retain its integrity as such. It should also be noted that many people chose to move to Wells House Road as it is an oasis of peace and quiet, close to West London areas such as Notting Hill, Shepherds Bush and Kensal Rise and with excellent transport connections in Zone 2. There are around 25 children under the age of 18 living in Wells House Road who can be seen and heard playing safely in the street. 1.3 Wells House Road also has exceptional views across London to the London Eye and the Shard. 1.4 It should be noted that Wells House Residents will be at the centre of HS2 and OPDC development for 10-30 years.
70	1085	Local Resident	Joanna Betts		Places	P1		This would include the adherence to the proposed green space between Wells House Road and the HS2 station, as illustrated in promised by Peter Fry of HS2 and other HS2 staff during their consultations. We require justification as to why this minor request is being ignored.

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70	1089	Local Resident	Joanna Betts		Places	P8		We ask that the OPDC acts humanely and works with HS2 to provide ACOUSTIC GLAZING and AIR CONDITIONING for ALL HOUSES in Wells House Road, back & front. See Appendix 1: Air quality.
70	1100	Local Resident	Joanna Betts		Places	P5 P4		There is a need for justification of why Park Royal can't have some mixed use, e.g. add an extra floor or two to some of the warehouses to include residential or live/work spaces – and underpinning the idea of making the area a contemporary and vibrant neighbourhood for Londoners. OPDC needs to take a more 21st century approach and aim to develop the area into a vibrant community like East London, in order to meet needs of Londoners. This area already includes artists' studios and prop houses, and it could potentially become another Shoreditch where a change to mixed-use is achieved without impacting on existing businesses. This would encourage vibrant cafes and shops to pop up, which would be used by existing workers in the area. This is supported by the impossibility of significantly intensifying land use of Park Royal according to the Industrial Land Study.
70	1101	Local Resident	Joanna Betts		Places	P8		We ask for 'sweeteners' for Wells House Residents to see us through the next decades of noise, pollution and disruption. This should include the rebuilding of our retaining wall as a green wall, which will help the entire community deal with noise and pollution. We also ask OPDC to work with Wells House Road residents to discuss other ideas for softening the blows to our already blighted community.
70	1106	Local Resident	Joanna Betts		Places			There are significant concentrations of poor air quality in terms of NOx exceedances at areas of early and high density planned developments along Scrubs Lane, with an Air Quality Focus Area at the intersection with Harrow Road and Harlesden Town Centre; and another challenging area expected at the Victoria Road/Old Oak Lane area, consequent upon HS2 works. Table 5.1 of the AQS proposes several focus areas for air quality control. Specific monitoring, abatement and mitigation measures should be specifically brought forward into each Place policy.
70	1107	Local Resident	Joanna Betts		Places	P7		Specific impacts of HS2 are recognised in the Air Quality Study (P28) This is an issue in the "North Acton Place" Policy and the following paragraph (NA.14) could be strengthened (also, developments should not be permitted where air quality exceedances) and brought into the policy box:
70	1108	Local Resident	Joanna Betts		Places	P4	c)	This form of words from the Park Royal Places policies could be strengthened, brought into the policy box as opposed to supporting text and used more generally: "Policy P4C (1m) Policy P4 (l): Contributing to and/or delivering measures that help support OPDC, the host authorities, and where relevant TfL, to improve air quality monitoring, and overcome issues identified in Local Air Quality Focus Areas around the A40 and A406." To note: PRW9 – encourages a modal shift in Park Royal to address pollution issues]
70	1118	Local Resident	Joanna Betts		Places	P8		Before explaining my concerns, I would like to make you aware of how unique Wells House Road is as a community. Its slightly isolated position means WHR maintains a real sense of individuality and community, far more than any other place I have ever lived in London (including much wealthier areas such as Belsize Park and Crouch End). As someone born and bred in London, I had started to think that these kind of inclusive communities no longer exist in such a big city, but living in WHR has shown me that welcoming communities can still thrive in the right conditions. We know more neighbours in WHR than we ever knew in any other place we've lived, and love the friendly, inclusive feel and genuine concern and care residents show both for each other and for the street as a whole. We would hate to see that lost with the development of the area. My partner and I moved into Wells House Road intending to start a family, and want to make sure that the development of Old Oak Common creates an inclusive, thoughtfully designed, green community.
70	1119	Local Resident	Joanna Betts		Places	P8		I would like to re-emphasise Amanda's request to the OPDC to protect our community by making WHR a conservation area, and listing us as a community asset. We would also like to see various community assets preserved, including the warehouses along the Grand Union Canal which are fantastic and could easily be developed into amazing restaurants/cafes, similar to Granary Square at Kings Cross. I would also like to encourage the OPDC to help rebuild our retaining wall as a green wall, which would help deal with noise and pollution.
73	1131	Unknown	A. Somefun		Places	P10 P10C1		Currently the area around and along Scrubs Lane is overrun with noisy dirty waste and skip trucks using the metal recycling plant, articulated lorries. You will very rarely see people walking down Scrubs lane. Its unhealthy and unpleasant place to be. The spatial plan I hope will ensure that all that industrial environment gets moved to a more appropriate area. I cant imagine anything nice to happen around Scrubs Lane until the powers are serious and decide they want it to be a beautiful healthy street something has to be done about the heavy industrially oriented traffic and businesses around there. Also the Harrow road area just before you turn left into Scrubs Lane. is extremely tired and run down. Always constantly strewn with rubbish lining the streets. Its horrific some days looks like caught up in a time warp. You would never think is 2017 around there, rubbish and neglect everywhere. Hammersmith and Fulham and Brent Council seemingly unwilling to do anything around that area because it sits right on the boundary between the boroughs and their political differences !. Considering its such a central location the neglect is shocking. The difference to all the development going in Wembley and White City is incredible.
73	1132	Unknown	A. Somefun		Places	P10C2		Policy is sound (no justification provided)
73	1133	Unknown	A. Somefun		Places	P10C3		Policy is sound (no justification provided)
73	1134	Unknown	A. Somefun		Places	P10C4		Policy is sound (no justification provided)
76	1162	Strategic Partner	Colin Lovell	Diocese of London	Places	P1		It would be helpful if in this policy and in P2 for Old Oak North a definition of 'community hub' was included for the sake of clarity. We appreciate that this is not strictly an objection to the Plan not being positively prepared
76	1163	Strategic Partner	Colin Lovell	Diocese of London	Places	P1C1		Policy is sound (no justification provided)
76	1164	Strategic Partner	Colin Lovell	Diocese of London	Places	P7	NA.18 10.31	Policy NA18 makes reference to the need for secondary school on the site but no site is shown on the plan, or even referred to. Para. 10.31 states that there is no need to allocate a site yet as it will not be needed until beyond the plan period. There is surely a risk that without a masterplanning and safeguarding exercise options to identify the best site will be lost.
77	1180	Local Resident	Sarah Abrahart		Places	P1		Policy is unsound (no justification provided)
77	1181	Local Resident	Sarah Abrahart		Places	P3		The grand Union canal should be preserved as a natural habitat for wildlife, (including a number of protected species of bat) and should not be encroached upon further by humans.

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77	1182	Local Resident	Sarah Abrahart		Places	P8		Policy is unsound (no justification provided)
77	1183	Local Resident	Sarah Abrahart		Places	P10		Policy is unsound (no justification provided)
77	1184	Local Resident	Sarah Abrahart		Places	P12		What on earth is 'Wormwood Scrubs Street'? We do not wish for any new acces to the Scrubs. We also do not wish for any enhancements to the Scrubs and definitely no lighting. I attended the numerous workshops last year and these views were overwhelmingly shared by those in attendance. Hands off the Scrubs!
79	1201	Local Resident	David Craine		Places	P10 P10C1		The community and employment aspect of cluster P10C1 is especially important, including the nursery and church at 2 Scrubs Lane. This cluster should also be sensitive to the surrounding existing residential development (eg with regard to the height of 2 Scrubs Lane).
79	1202	Local Resident	David Craine		Places	P10C2		Policy is sound (no justification provided)
79	1203	Local Resident	David Craine		Places	P10C3		Policy is sound (no justification provided)
79	1204	Local Resident	David Craine		Places	P10C4		I support the focus on leisure, eating, drinking and communal activity close to the canal to help make the area around the canal more inviting,
79	1205	Local Resident	David Craine		Places	P11		I strongly support these improvements. They are important to connect Harlesden with Old Oak. The station upgrades can help stimulate investment in advance of the building of the main Old Oak Crossrail/HS2 station.
81	1221	Community Group	Chloe Fremantle	ArtWest	Places	P10		We would like to emphasize the importance of improving the bus service travelling along Scrubs Lane to Wood Lane/Willesden Junction, & that the number of buses serving it is increased, as it is already very over-stretched.
81	1222	Community Group	Chloe Fremantle	ArtWest	Places	P3		Consideration must certainly be given to increasing the size of the foot and bicycle paths along the Canal- as the current situation can be often detrimental to both enjoyment & safety, instead of it being a local amenity and pleasant green waterside space
81	1226	Community Group	Chloe Fremantle	ArtWest	Places	P2	OON.8	ArtWest suggest some of these areas could be suitable for creative workspaces?
81	1228	Community Group	Chloe Fremantle	ArtWest	Places	P2	OON.12	ArtWest suggests that inclusion of artists' workspaces during the development stages could be very beneficial to the OPDC, and hopes this will be considered.
81	1229	Community Group	Chloe Fremantle	ArtWest	Places	P2	OON.19	Amongst these suggestions an Arts Centre Space offering workshops etc. could be included to feed into the community leisure, activity and social needs.
81	1230	Community Group	Chloe Fremantle	ArtWest	Places	P3	k)i) and l)	We especially feel the preservation of the Birchwood Nature Reserve is important and support this clause
81	1231	Community Group	Chloe Fremantle	ArtWest	Places	P10		We support these policies and very much hope the OPDC will be able to deliver their vision.
81	1232	Community Group	Chloe Fremantle	ArtWest	Places	P10	j)v)	We would like “ a tall building in each cluster” to be further qualified. See Building Heights J) v)
81	1233	Community Group	Chloe Fremantle	ArtWest	Places	P12	V1 and V2	We strongly support these views of the OPDC as expressed here and hope all the local communities & councils & the OPDC will work together to preserve this National treasure.
82	1254	Neighbourhood Forum	Henry Peterson	St Quintin and Woodlands Neighbourhood Forum	Places	Site Allocati ons		The Plan gives no information on the anticipated range of building heights on the series of sites which are allocated housing targets at page 50 of the Plan
82	1259	Neighbourhood Forum	Henry Peterson	St Quintin and Woodlands Neighbourhood Forum	Places	P10	SL5	We see no evidence base or justification for Scrubs Lane Policy P10m) on enabling the comprehensive redevelopment of the area south of the Grand Union Canal. Paragraph SL5 re-fers to regeneration of the Mitre Industrial Estate with the potential for new housing. OPDC models and CGI images show a further cluster of residential towers at this location. The existing industrial buildings are relatively modern (1980s) and the access road was built specifically to provide access to a light industrial estate which operates effectively. Given the priority that the Plan gives to protecting areas of SIL, and excluding any mixed use in these areas, Policy P10m appears illogical. It is not positively planned nor justified. Contact
83	1260	Local Resident	Nadia Samara		Places	P8		1.1 Wells House Road Residents Association, an association of residents, that represents the interests of some 400+ Wells House Road residents and landlords directly affected by construction and development from the OPDC Local Plan proposals as well as the HS2 Old Oak Common interchange construction. 1.2 Wells House Road is a triangular cul-de-sac of around 125 Edwardian homes of which 45 are occupied by people who have lived in the street for 25-70 years. At least ten homes are occupied by the children of the original residents and many are caring for elderly parents in these homes. It is a culturally diverse and integrated street. In short, this is a traditional family community that has a strong desire to retain its integrity as such. It should also be noted that many people chose to move to Wells House Road as it is an oasis of peace and quiet, close to West London areas such as Notting Hill, Shepherds Bush and Kensal Rise and with excellent transport connections in Zone 2. There are around 25 children under the age of 18 living in Wells House Road who can be seen and heard playing safely in the street. 1.3 Wells House Road also has exceptional views across London to the London Eye and the Shard. 1.4 It should be noted that Wells House Residents will be at the centre of HS2 and OPDC development for 10-30 years.
83	1267	Local Resident	Nadia Samara		Places	P1		This would include the adherence to the proposed green space between Wells House Road and the HS2 station, as illustrated in promised by Peter Fry of HS2 and other HS2 staff during their consultations. We require justification as to why this minor request is being ignored.
83	1271	Local Resident	Nadia Samara		Places	P8		We ask that the OPDC acts humanely and works with HS2 to provide ACOUSTIC GLAZING and AIR CONDITIONING for ALL HOUSES in Wells House Road, back & front. See Appendix 1: Air quality.
83	1282	Local Resident	Nadia Samara		Places	P5 P4		There is a need for justification of why Park Royal can't have some mixed use, e.g. add an extra floor or two to some of the warehouses to include residential or live/work spaces – and underpinning the idea of making the area a contemporary and vibrant neighbourhood for Londoners. OPDC needs to take a more 21st century approach and aim to develop the area into a vibrant community like East London, in order to meet needs of Londoners. This area already includes artists' studios and prop houses, and it could potentially become another

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								Shoreditch where a change to mixed-use is achieved without impacting on existing businesses. This would encourage vibrant cafes and shops to pop up, which would be used by existing workers in the area. This is supported by the impossibility of significantly intensifying land use of Park Royal according to the Industrial Land Study.
83	1283	Local Resident	Nadia Samara		Places	P8		We ask for 'sweeteners' for Wells House Residents to see us through the next decades of noise, pollution and disruption. This should include the rebuilding of our retaining wall as a green wall, which will help the entire community deal with noise and pollution. We also ask OPDC to work with Wells House Road residents to discuss other ideas for softening the blows to our already blighted community.
84	1287	Local Resident	Nicholas Kasic		Places	P8		1.1 Wells House Road Residents Association, an association of residents, that represents the interests of some 400+ Wells House Road residents and landlords directly affected by construction and development from the OPDC Local Plan proposals as well as the HS2 Old Oak Common interchange construction. 1.2 Wells House Road is a triangular cul-de-sac of around 125 Edwardian homes of which 45 are occupied by people who have lived in the street for 25-70 years. At least ten homes are occupied by the children of the original residents and many are caring for elderly parents in these homes. It is a culturally diverse and integrated street. In short, this is a traditional family community that has a strong desire to retain its integrity as such. It should also be noted that many people chose to move to Wells House Road as it is an oasis of peace and quiet, close to West London areas such as Notting Hill, Shepherds Bush and Kensal Rise and with excellent transport connections in Zone 2. There are around 25 children under the age of 18 living in Wells House Road who can be seen and heard playing safely in the street. 1.3 Wells House Road also has exceptional views across London to the London Eye and the Shard. 1.4 It should be noted that Wells House Residents will be at the centre of HS2 and OPDC development for 10-30 years.
84	1294	Local Resident	Nicholas Kasic		Places	P1		This would include the adherence to the proposed green space between Wells House Road and the HS2 station, as illustrated in promised by Peter Fry of HS2 and other HS2 staff during their consultations. We require justification as to why this minor request is being ignored.
84	1298	Local Resident	Nicholas Kasic		Places	P8		We ask that the OPDC acts humanely and works with HS2 to provide ACOUSTIC GLAZING and AIR CONDITIONING for ALL HOUSES in Wells House Road, back & front. See Appendix 1: Air quality.
84	1309	Local Resident	Nicholas Kasic		Places	P5 P4		There is a need for justification of why Park Royal can't have some mixed use, e.g. add an extra floor or two to some of the warehouses to include residential or live/work spaces – and underpinning the idea of making the area a contemporary and vibrant neighbourhood for Londoners. OPDC needs to take a more 21st century approach and aim to develop the area into a vibrant community like East London, in order to meet needs of Londoners. This area already includes artists' studios and prop houses, and it could potentially become another Shoreditch where a change to mixed-use is achieved without impacting on existing businesses. This would encourage vibrant cafes and shops to pop up, which would be used by existing workers in the area. This is supported by the impossibility of significantly intensifying land use of Park Royal according to the Industrial Land Study.
84	1310	Local Resident	Nicholas Kasic		Places	P8		We ask for 'sweeteners' for Wells House Residents to see us through the next decades of noise, pollution and disruption. This should include the rebuilding of our retaining wall as a green wall, which will help the entire community deal with noise and pollution. We also ask OPDC to work with Wells House Road residents to discuss other ideas for softening the blows to our already blighted community.
85	1314	Local Resident	Francis, Marc and Caroline Sauzier		Places	P8		1.1 Wells House Road Residents Association, an association of residents, that represents the interests of some 400+ Wells House Road residents and landlords directly affected by construction and development from the OPDC Local Plan proposals as well as the HS2 Old Oak Common interchange construction. 1.2 Wells House Road is a triangular cul-de-sac of around 125 Edwardian homes of which 45 are occupied by people who have lived in the street for 25-70 years. At least ten homes are occupied by the children of the original residents and many are caring for elderly parents in these homes. It is a culturally diverse and integrated street. In short, this is a traditional family community that has a strong desire to retain its integrity as such. It should also be noted that many people chose to move to Wells House Road as it is an oasis of peace and quiet, close to West London areas such as Notting Hill, Shepherds Bush and Kensal Rise and with excellent transport connections in Zone 2. There are around 25 children under the age of 18 living in Wells House Road who can be seen and heard playing safely in the street. 1.3 Wells House Road also has exceptional views across London to the London Eye and the Shard. 1.4 It should be noted that Wells House Residents will be at the centre of HS2 and OPDC development for 10-30 years.
85	1321	Local Resident	Francis, Marc and Caroline Sauzier		Places	P1		This would include the adherence to the proposed green space between Wells House Road and the HS2 station, as illustrated in promised by Peter Fry of HS2 and other HS2 staff during their consultations. We require justification as to why this minor request is being ignored.
85	1325	Local Resident	Francis, Marc and Caroline Sauzier		Places	P8		We ask that the OPDC acts humanely and works with HS2 to provide ACOUSTIC GLAZING and AIR CONDITIONING for ALL HOUSES in Wells House Road, back & front. See Appendix 1: Air quality.
85	1336	Local Resident	Francis, Marc and Caroline Sauzier		Places	P5 P4		There is a need for justification of why Park Royal can't have some mixed use, e.g. add an extra floor or two to some of the warehouses to include residential or live/work spaces – and underpinning the idea of making the area a contemporary and vibrant neighbourhood for Londoners. OPDC needs to take a more 21st century approach and aim to develop the area into a vibrant community like East London, in order to meet needs of Londoners. This area already includes artists' studios and prop houses, and it could potentially become another Shoreditch where a change to mixed-use is achieved without impacting on existing businesses. This would encourage vibrant cafes and shops to pop up, which would be used by existing workers in the area. This is supported by the impossibility of significantly intensifying land use of Park Royal according to the Industrial Land Study.
85	1337	Local Resident	Francis, Marc and Caroline Sauzier		Places	P8		We ask for 'sweeteners' for Wells House Residents to see us through the next decades of noise, pollution and disruption. This should include the rebuilding of our retaining wall as a green wall, which will help the entire community deal with noise and pollution. We also ask OPDC to work with Wells House Road residents to discuss other ideas for softening the blows to our already blighted community.
85	1341	Local Resident	Francis, Marc and Caroline Sauzier		Places			There are significant concentrations of poor air quality in terms of NOx exceedances at areas of early and high density planned developments along Scrubs Lane, with an Air Quality Focus Area at the intersection with Harrow Road and Harlesden Town Centre; and another challenging area expected at the Victoria Road/Old Oak Lane area, consequent upon HS2 works. Table 5.1 of the AQS proposes several focus areas for air quality control. Specific monitoring, abatement and mitigation measures should be specifically brought forward into each Place policy.

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85	1342	Local Resident	Francis, Marc and Caroline Sauzier		Places	P7		Specific impacts of HS2 are recognised in the Air Quality Study (P28) This is an issue in the “North Acton Place” Policy and the following paragraph (NA.14) could be strengthened (also, developments should not be permitted where air quality exceedances) and brought into the policy box:
85	1343	Local Resident	Francis, Marc and Caroline Sauzier		Places	P4	c)	This form of words from the Park Royal Places policies could be strengthened, brought into the policy box as opposed to supporting text and used more generally: "Policy P4C (1m) Policy P4 (l): Contributing to and/or delivering measures that help support OPDC, the host authorities, and where relevant TfL, to improve air quality monitoring, and overcome issues identified in Local Air Quality Focus Areas around the A40 and A406." To note: PRW9 – encourages a modal shift in Park Royal to address pollution issues]
86	1353	Community Group	Nicholas Fernley	Hammersmith and Fulham Historic Buildings Group	Places	P2	m)i)	Many buildings of historic and architectural interest have been lost from the area. The white factory group at the east end, north side of Hythe Road is a particular loss. The sculptural bollards installed along Hythe Road by a recent occupier should have been saved and used in the street scene of the redevelopment. The Rolls-Royce Building of c.1939 is still there. The developers and their architect have proposed retaining parts of the building, and we believe that they should be encouraged to do this, and the planning process should further this idea.
86	1354	Community Group	Nicholas Fernley	Hammersmith and Fulham Historic Buildings Group	Places	P10		We are concerned that St Mary’s Cemetery will be overlooked by tall buildings. Already one nearby tower block has been given planning approval. The Group objected to this, and we will object to any similar proposals.
86	1355	Community Group	Nicholas Fernley	Hammersmith and Fulham Historic Buildings Group	Places	P12		Wormwood Scrubs is common land and thus specially protected. It is also Metropolitan Open Land, and parts of it are a Local Nature Reserve. Our main concern is that the areas of greatest value for ecological interest and biodiversity are just south of the railway land. When the railway land is developed to provide points of access and to expand the use of the Common, this should be managed to protect the wild life. For example, play equipment areas should be on the periphery of the sports pitch area, and outdoor gym equipment should be near the street workout structures, just north of the Linford Christie Stadium (or the possible Queen's Park Rangers stadium).
86	1356	Community Group	Nicholas Fernley	Hammersmith and Fulham Historic Buildings Group	Places	P3		In the wider area there a number of heritage issues which we support. The most obvious is that those parts of the Grand Union Canal not already designated Conservation Areas should now become Conservation Areas. We see no reason for not similarly treating the Canal in all Boroughs that are partly in the OPDA area, and indeed we argue that all of the Grand Union Canal, and the other canals in Greater London, should become Conservation Areas. This would lead to a consistent management framework for the Boroughs and the Canal and River Trust to manage them for nature conservation, recreation, and commercial/transportation/ industry uses. We highlight the Aqueduct over the River Brent and the North Circular Road as a significant entrance of the Grand Union Canal into the OPDA area.
87	1360	Local Resident	Patrick Munroe		Places	P8		WHR is a unique road it is very rare such community spirit can be found in London today . I have had an association with WHR for almost 40 years I have many friends that live on the road and I bought a property on the road 2 years ago regardless of the chaos that is about to descend on the local area. The community spirit out weighed the chaos as far as I was concerned . I now am dismayed to hear that on top of the chaos the very essence of WHS is now at risk roads and communities such as ours should be supported and not destroyed by being swallowed up and surrounded by a high rise jungle. Surely that can't be the future is Londons small suburban areas doomed and are tight knit communities a thing of the past
87	1361	Local Resident	Patrick Munroe		Places	P8		1.1 Wells House Road Residents Association, an association of residents, that represents the interests of some 400+ Wells House Road residents and landlords directly affected by construction and development from the OPDC Local Plan proposals as well as the HS2 Old Oak Common interchange construction. 1.2 Wells House Road is a triangular cul-de-sac of around 125 Edwardian homes of which 45 are occupied by people who have lived in the street for 25-70 years. At least ten homes are occupied by the children of the original residents and many are caring for elderly parents in these homes. It is a culturally diverse and integrated street. In short, this is a traditional family community that has a strong desire to retain its integrity as such. It should also be noted that many people chose to move to Wells House Road as it is an oasis of peace and quiet, close to West London areas such as Notting Hill, Shepherds Bush and Kensal Rise and with excellent transport connections in Zone 2. There are around 25 children under the age of 18 living in Wells House Road who can be seen and heard playing safely in the street. 1.3 Wells House Road also has exceptional views across London to the London Eye and the Shard. 1.4 It should be noted that Wells House Residents will be at the centre of HS2 and OPDC development for 10-30 years.
87	1367	Local Resident	Patrick Munroe		Places	P8		In order to ‘soften the blow’, there is a need for a ‘buffer zone’ of around 100 meters between the existing communities and new developments that will be higher than existing buildings. We require justification of the unreasonable plot ratios and the ‘soft area’, which has not been included in Reg. 19 despite our repeated requests throughout the consultation. At all costs, OPDC developments should avoid overshadowing, the intensification of pressure on transport, and should revert to the previous agreement in Reg. 18 on sensitive edges. Ideally, OPDC should provide formal limits to the proximity of new developments around sensitive existing communities and move to a policy of green space around new developments.
87	1368	Local Resident	Patrick Munroe		Places	P1		This would include the adherence to the proposed green space between Wells House Road and the HS2 station, as illustrated in promised by Peter Fry of HS2 and other HS2 staff during their consultations. We require justification as to why this minor request is being ignored.
87	1372	Local Resident	Patrick Munroe		Places	P8		We ask that the OPDC acts humanely and works with HS2 to provide ACOUSTIC GLAZING and AIR CONDITIONING for ALL HOUSES in Wells House Road, back & front. See Appendix 1: Air quality.
87	1383	Local Resident	Patrick Munroe		Places	P5 P4		There is a need for justification of why Park Royal can’t have some mixed use, e.g. add an extra floor or two to some of the warehouses to include residential or live/work spaces – and underpinning the idea of making the area a contemporary and vibrant neighbourhood for Londoners. OPDC needs to take a more 21st century approach and aim to develop the area into a vibrant community like East London, in order to meet needs of Londoners. This area already includes artists’ studios and prop houses, and it could potentially become another Shoreditch where a change to mixed-use is achieved without impacting on existing businesses. This would encourage vibrant cafes and shops to pop up, which would be used by existing workers in the area. This is supported by the impossibility of significantly intensifying land use of Park Royal according to the Industrial Land Study.

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87	1384	Local Resident	Patrick Munroe		Places	P8		We ask for 'sweeteners' for Wells House Residents to see us through the next decades of noise, pollution and disruption. This should include the rebuilding of our retaining wall as a green wall, which will help the entire community deal with noise and pollution. We also ask OPDC to work with Wells House Road residents to discuss other ideas for softening the blows to our already blighted community.
88	1388	Local Resident	Lily Gray		Places	P8		1.1 Wells House Road Residents Association, an association of residents, that represents the interests of some 400+ Wells House Road residents and landlords directly affected by construction and development from the OPDC Local Plan proposals as well as the HS2 Old Oak Common interchange construction. 1.2 Wells House Road is a triangular cul-de-sac of around 125 Edwardian homes of which 45 are occupied by people who have lived in the street for 25-70 years. At least ten homes are occupied by the children of the original residents and many are caring for elderly parents in these homes. It is a culturally diverse and integrated street. In short, this is a traditional family community that has a strong desire to retain its integrity as such. It should also be noted that many people chose to move to Wells House Road as it is an oasis of peace and quiet, close to West London areas such as Notting Hill, Shepherds Bush and Kensal Rise and with excellent transport connections in Zone 2. There are around 25 children under the age of 18 living in Wells House Road who can be seen and heard playing safely in the street. 1.3 Wells House Road also has exceptional views across London to the London Eye and the Shard. 1.4 It should be noted that Wells House Residents will be at the centre of HS2 and OPDC development for 10-30 years.
88	1395	Local Resident	Lily Gray		Places	P1		This would include the adherence to the proposed green space between Wells House Road and the HS2 station, as illustrated in promised by Peter Fry of HS2 and other HS2 staff during their consultations. We require justification as to why this minor request is being ignored.
88	1399	Local Resident	Lily Gray		Places	P8		We ask that the OPDC acts humanely and works with HS2 to provide ACOUSTIC GLAZING and AIR CONDITIONING for ALL HOUSES in Wells House Road, back & front. See Appendix 1: Air quality.
88	1410	Local Resident	Lily Gray		Places	P5 P4		There is a need for justification of why Park Royal can't have some mixed use, e.g. add an extra floor or two to some of the warehouses to include residential or live/work spaces – and underpinning the idea of making the area a contemporary and vibrant neighbourhood for Londoners. OPDC needs to take a more 21st century approach and aim to develop the area into a vibrant community like East London, in order to meet needs of Londoners. This area already includes artists' studios and prop houses, and it could potentially become another Shoreditch where a change to mixed-use is achieved without impacting on existing businesses. This would encourage vibrant cafes and shops to pop up, which would be used by existing workers in the area. This is supported by the impossibility of significantly intensifying land use of Park Royal according to the Industrial Land Study.
88	1411	Local Resident	Lily Gray		Places	P8		We ask for 'sweeteners' for Wells House Residents to see us through the next decades of noise, pollution and disruption. This should include the rebuilding of our retaining wall as a green wall, which will help the entire community deal with noise and pollution. We also ask OPDC to work with Wells House Road residents to discuss other ideas for softening the blows to our already blighted community.
88	1415	Local Resident	Lily Gray		Places			There are significant concentrations of poor air quality in terms of NOx exceedances at areas of early and high density planned developments along Scrubs Lane, with an Air Quality Focus Area at the intersection with Harrow Road and Harlesden Town Centre; and another challenging area expected at the Victoria Road/Old Oak Lane area, consequent upon HS2 works. Table 5.1 of the AQS proposes several focus areas for air quality control. Specific monitoring, abatement and mitigation measures should be specifically brought forward into each Place policy.
88	1416	Local Resident	Lily Gray		Places	P7		Specific impacts of HS2 are recognised in the Air Quality Study (P28) This is an issue in the "North Acton Place" Policy and the following paragraph (NA.14) could be strengthened (also, developments should not be permitted where air quality exceedances) and brought into the policy box:
88	1417	Local Resident	Lily Gray		Places	P4	c)	This form of words from the Park Royal Places policies could be strengthened, brought into the policy box as opposed to supporting text and used more generally: "Policy P4C (1m) Policy P4 (l): Contributing to and/or delivering measures that help support OPDC, the host authorities, and where relevant TfL, to improve air quality monitoring, and overcome issues identified in Local Air Quality Focus Areas around the A40 and A406." To note: PRW9 – encourages a modal shift in Park Royal to address pollution issues]
89	1429	Local Resident	Nicky Guymer		Places	P1	iii	Policy P11(iii) for Old Oak South talks of heights of generally 6-8 storeys fronting directly onto the Grand Union Canal with opportunities for taller buildings at key crossing points such as Old Oak High Street but this is the exception. The plan should say clearly that residential enclaves like the railway cottages, Midland Terrace and Wells House Road, are not overshadowed by development that is out of scale with them OR more than six storeys in height throughout.
89	1431	Local Resident	Nicky Guymer		Places	Site Allocations		Page 50 of this plan has a table of 28 individual Site Allocations but it doesn't clarify the site's size or the housing density: this doesn't comply with National Planning Policy Guidance (Paragraph 010) which says these details have to be made clear to local communities.
89	1433	Local Resident	Nicky Guymer		Places	P3		TITRA welcomes Policy P3 use of the canal in Old Oak's redevelopment but wants clarity/future environmental controls if contractors use it for moving construction and other waste material – from wharves such as Powerday.
89	1434	Local Resident	Nicky Guymer		Places	P3		We think P3 needs to show how the southern towpath will be 'improved' to create an 'east-west walking and cycling route'. We question how a two-way cycling route can be delivered when space is so limited – especially where the bridges constrict the towpath. Conflict over the towpath is a problem, so much so that TITRA members have petitioned the OPDC and Ealing Council over the aggression shown by cyclists towards pedestrians that they have petitioned the OPDC and Ealing Council on this issue
89	1435	Local Resident	Nicky Guymer		Places	P7		TITRA objects to P7's current early-stage proposal from TfL for a 9 metre-wide cycle/pedestrian bridge from the Old Oak Common Overground Station connecting the HS2/Crossrail station and North Acton Station. Initial proposals were for a tunnel give the sensitivity of the Midland Terrace/Shafesbury Gardens locations - this should be further explored.
89	1436	Local Resident	Nicky Guymer		Places	P9		In Policy P9 on Channel Gate, TITRA sees the designation of parts of the area as SIL as being inflexible to changing economic needs, and in conflict with ensuring air quality / no pollution in the railway cottages enclave. This policy could also conflict with P9 sub-policies on Public Realm and Movement (P9g) and Green Infrastructure (Policy P9 h).

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
89	1437	Local Resident	Nicky Guymer		Places	P9	g)	TITRA supports Policy P9g seeking strengthening access points into Channel Gate from Atlas Road. In the long-term, our association wants to see Channel Gate Road itself closed altogether, given its polluting nature and its associated anti-social behaviours, once HS2 no longer has requirements for this land.
91	1461	Local Resident	Bruce Stevenson		Places	P1	iii	Policy P11(iii) for Old Oak South talks of heights of generally 6-8 storeys fronting directly onto the Grand Union Canal with opportunities for taller buildings at key crossing points such as Old Oak High Street but this is the exception. The plan should say clearly that residential enclaves like the railway cottages, Midland Terrace and Wells House Road, are not overshadowed by development that is out of scale with them OR more than six storeys in height throughout.
91	1463	Local Resident	Bruce Stevenson		Places	Site Allocations		Page 50 of this plan has a table of 28 individual Site Allocations but it doesn't clarify the site's size or the housing density: this doesn't comply with National Planning Policy Guidance (Paragraph 010) which says these details have to be made clear to local communities.
91	1465	Local Resident	Bruce Stevenson		Places	P3		TITRA welcomes Policy P3 use of the canal in Old Oak's redevelopment but wants clarity/future environmental controls if contractors use it for moving construction and other waste material – from wharves such as Powerday.
91	1466	Local Resident	Bruce Stevenson		Places	P3		We think P3 needs to show how the southern towpath will be 'improved' to create an 'east-west walking and cycling route'. We question how a two-way cycling route can be delivered when space is so limited – especially where the bridges constrict the towpath. Conflict over the towpath is a problem, so much so that TITRA members have petitioned the OPDC and Ealing Council over the aggression shown by cyclists towards pedestrians that they have petitioned the OPDC and Ealing Council on this issue
91	1467	Local Resident	Bruce Stevenson		Places	P7		TITRA objects to P7's current early-stage proposal from TfL for a 9 metre-wide cycle/pedestrian bridge from the Old Oak Common Overground Station connecting the HS2/Crossrail station and North Acton Station. Initial proposals were for a tunnel give the sensitivity of the Midland Terrace/Shafesbury Gardens locations - this should be further explored.
91	1468	Local Resident	Bruce Stevenson		Places	P9		In Policy P9 on Channel Gate, TITRA sees the designation of parts of the area as SIL as being inflexible to changing economic needs, and in conflict with ensuring air quality / no pollution in the railway cottages enclave. This policy could also conflict with P9 sub-policies on Public Realm and Movement (P9g) and Green Infrastructure (Policy P9 h).
91	1469	Local Resident	Bruce Stevenson		Places	P9	g)	TITRA supports Policy P9g seeking strengthening access points into Channel Gate from Atlas Road. In the long-term, our association wants to see Channel Gate Road itself closed altogether, given its polluting nature and its associated anti-social behaviours, once HS2 no longer has requirements for this land.
92	1479	Community Group	Tom Ryland	Hammersmith Society	Places	P1		In our February 2016 submission, we welcomed the then Chancellor's statement in his Budget Statement that he would assist in the transfer of the 70 hectares of land in public ownership from the various public bodies involved to the OPDC. It was also implied that there would be other Government funding to assist with the massive infrastructure costs needed to ensure that the project could realistically proceed. Not only do the above arrangements appear to have stalled, but two further issues have arisen which would fundamentally affect the achievability of the project. The first is that HS2 have made clear that they do not wish the new interchange station at Old Oak Common to be decked over and developed. The second is that the extensive sidings being constructed on the site for the Elizabeth Line cannot now be decked over and developed over as was originally intended because the correct foundations have not been installed, and objections by TfL. Both of these problems will result in a substantial reduction in the development capacity in the Old Oak South. Unless and until the development capacity is re-assessed, these factors alone render a major part of the Plan ineffective and therefore unsound.
92	1489	Community Group	Tom Ryland	Hammersmith Society	Places	P3		The Hammersmith Society still believe the following are key objectives for the development of the OPDC area : The importance of the canal for open green space, leisure and sport, the attractive environment it can provide for nearby housing and for the preservation of existing heritage buildings.
92	1490	Community Group	Tom Ryland	Hammersmith Society	Places	P12		The Hammersmith Society still believe the following are key objectives for the development of the OPDC area : The importance of the retention and limited enhancement of Wormwood Scrubs as important open space for the enjoyment of local people as a nature reserve and its many sporting activities.
92	1498	Community Group	Tom Ryland	Hammersmith Society	Places	P1		Old Oak Station : The main catalyst for the project is Old Oak Station with its connection of HS2 and the Elizabeth Crossrail Line, but there are many questions around the implementation of this. It is estimated that the station will be the second largest in the country after Waterloo and passenger numbers could be in the order of 250,000 per day. A comparison of the site area envisaged for the new station is minimal and there appears to be no suitable concourse area. According to the Transport Section T6. There are no bus routes shown servicing the station.
92	1499	Community Group	Tom Ryland	Hammersmith Society	Places	P1		The original OPDC plan envisaged that there would be the major cluster of tall buildings on or around the station building, but HS2 have indicated that they would not wish the station building to be built upon. This has serious implications for the realization of the vision and could have undesirable consequences for development around the station.
92	1500	Community Group	Tom Ryland	Hammersmith Society	Places	P1		To what extent is the station seen as merely a connecting junction rather than a destination in itself : There are presently only two platforms and no additional platform capacity in the station for trains delayed or waiting.
92	1512	Community Group	Tom Ryland	Hammersmith Society	Places	P2		We also note that Car Giant have already reduced the target within their site from 9,000 units to 7,000 (maybe even 6500).
92	1544	Community Group	Tom Ryland	Hammersmith Society	Places	P8		We note that this section has been redrafted since the original Draft Plan and that there are now 12 'places' identified. We agree there is merit in creating a separate Place to bring together the areas of existing housing in Old Oak and eastern part of Park Royal.
92	1545	Community Group	Tom Ryland	Hammersmith Society	Places			We broadly support this section on Places, but accept that many local groups are concerned about the boundary definitions. We again challenge the assumptions in the Plan regarding the overall targets for housing and employment, and within the individual Place sections as being unrealistic. These do not appear to be sufficiently evidence based and must therefore be regarded as unjustified and unsound.

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92	1546	Community Group	Tom Ryland	Hammersmith Society	Places			We consider that the accompanying detailed local plans in many of the Place section are too detailed and prescriptive bearing in mind that there is no overall strategic plan and so much of the detailed planning is still unresolved at this stage.
92	1547	Community Group	Tom Ryland	Hammersmith Society	Places	P7		There is widespread dismay by us and most members of the Grand Union Alliance at the nature of the development at North Acton as an example of intense development on a neighbouring site. It would appear to be completely devoid of any sense of place, and the predominance of student and buy-to-let accommodation means that any aspirations for it to be a cohesive neighbourhood are impossible. The clustering of the relatively tall buildings is banal and the architectural standard is dismal. We very much hope that this is seen as an exemplar to OPDC of how not to do it.
92	1548	Community Group	Tom Ryland	Hammersmith Society	Places	P1		We have already set our concerns above regarding the design of Old Oak Station and the lack of sufficient space being allowed. This together with HS2's requirement that the station should not be over built over and the question mark as to whether the Elizabeth Crossrail Line sidings can be built over either, have huge ramifications for the overall development. The interchange station does not appear to have been adequately planned for the numbers of users expected. The lack of proposed bus connection is astonishing and there is no effective connection to Willesden Junction station. Until and unless these problems are resolved, the Plan cannot be said to be positively prepared, effective or sound.
92	1549	Community Group	Tom Ryland	Hammersmith Society	Places	P2		We have regularly attended the consultations arranged on behalf of Cargiant, and in principle we support these proposals. We are pleased that they have recognised the problems which we have highlighted over excessive density and reduced the quantum of housing being provided. We would also note that the developers have been responsive to our wish to see more existing buildings retained. This has resulted in the Rolls Royce building being retained in the latest plans.
92	1550	Community Group	Tom Ryland	Hammersmith Society	Places	P2		Densities and building heights in Old Oak North draw on the proposed Hythe Road Station to justify high PTALs and building heights. It should not be part of the evidence base until there is TfL commitment to funding the station. In the absence of that TfL commitment, this section and the resultant assumptions are not justified, nor effective.
92	1551	Community Group	Tom Ryland	Hammersmith Society	Places	P10		Densities and building heights in Scrubs Lane draw on the proposed Hythe Road Station to justify high PTALs and building heights. It should not be part of the evidence base until there is TfL commitment to funding the station. In the absence of that TfL commitment, this section and the resultant assumptions are not justified, nor effective.
92	1552	Community Group	Tom Ryland	Hammersmith Society	Places	P3		We received a copy of the CRT submission as a statutory consultee dated 31 March 2016, but have not seen their updated submission. We support their comments particularly in respect of moorings (to be short term only) and provision of new basins, improved towpath, new walkway to the north of the canal, lighting, new bridges, freight transport, green infrastructure and biodiversity.
92	1553	Community Group	Tom Ryland	Hammersmith Society	Places	P3		We are pleased that the canal is now identified as Green Open Space. Although it was noted as such in the OAPF (OAPF Figure 34) it was not included as open space in the last Plan or on the previous Walking Infrastructure map (OPDC Figure 105).
92	1554	Community Group	Tom Ryland	Hammersmith Society	Places	P3		Potential conflict of walking and cycling alongside canal : This could be resolved by some widening of the tow path, subject to the agreement of CRT. CRT do recognize this as a problem along all the London towpaths and has Shared Places signage and leaflets. The part of the canal towpath is however already included in its and the Mayor's Quietways cycling routes (for slower cycling) which we support.
92	1555	Community Group	Tom Ryland	Hammersmith Society	Places	P3		The canal represents an ideal opportunity for playing a part in the regeneration of the area and improving the lives of those who live, work or visit the OPDC area by providing a waterside green corridor, which can offer leisure and sporting activities through boating, canoeing, restaurants, cafes and pubs and an attractive environment for new homes to be built near the canal.
92	1556	Community Group	Tom Ryland	Hammersmith Society	Places	P3		Boating on the Paddington Arm is increasing year by year and more short-term moorings are needed and should be provided on the OPDC side of the canal, plus we believe there is a justification for incorporating one, if not two, marinas/basins within the development. Examples as to how this could enhance the area are at Engineers Wharf at Greenford, Abbots Wharf on the Limehouse stretch of the Lower Regents Canal, and enhancements at Kings Cross, Brentford and Tottenham Hale. We accept the CRT view that long term moorings (Eg Houseboats) should be discouraged.
92	1557	Community Group	Tom Ryland	Hammersmith Society	Places	P3		The canal is a Conservation Area because of its history, which in particular includes two particularly historic buildings, the waterside warehouses and the Rolls Royce factory. We believe it is important that these be retained, but obviously adapted to alternative uses. The L-shape of the rear of the Rolls Royce would present an ideal backdrop for a new marina/basin. We support the proposal that a Local List should be compiled for the canal and it should include the canal bank warehousing, as although in currently poor condition, restored for new uses they could be very attractive.
92	1558	Community Group	Tom Ryland	Hammersmith Society	Places	P3		We prefer the proposal for a continuous green corridor on the north side of the canal in the OPDC area, except it would need to go behind the warehouses which we wish to see retained. The CRT have suggested how this might be overcome.
92	1559	Community Group	Tom Ryland	Hammersmith Society	Places	P3		We support the proposal that heights of building along both sides of the canal should be restricted to 6 – 8 storeys maximum: We do not agree that this should be relaxed at node points or crossings as the buildings would dominate the canal setting.
92	1560	Community Group	Tom Ryland	Hammersmith Society	Places	P3		Use of the canal water as part of District Heating should be encouraged. An example is at the GSK offices in Brentford and examples in Docklands where it is used for heating and cooling offices.
92	1561	Community Group	Tom Ryland	Hammersmith Society	Places	P12		Existing Character: The status (and legal protection) as Metropolitan Open Space should be specifically mentioned and emphasized in this section and in the Vision.
92	1562	Community Group	Tom Ryland	Hammersmith Society	Places	P12		we have read and fully support the submission 'Response by the Friends of Wormwood Scrubs'.

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92	1563	Community Group	Tom Ryland	Hammersmith Society	Places	P12		Most local groups and residents wish to see Wormwood Scrubs preserved much as it is : Its natural wild character is much enjoyed and urbanisation should be resisted. “Potential sensitive improvements” (4.163) should be viewed with caution. The sustainability of visitor numbers should be taken into account with any open space. Wormwood Scrubs will receive much greater visitor numbers in the future from new residents and workers in the OPDC area and priority should be given to preserving its informal character rather than increasing hard-surface walking and cycling routes or attracting visitors from further afield.
92	1564	Community Group	Tom Ryland	Hammersmith Society	Places	P12		Wormwood Scrubs must not be allowed to be assumed as provision of open space by either OPDC or developers, as a substitute for adequate on site provision. It also should not be used as a construction site.
92	1565	Community Group	Tom Ryland	Hammersmith Society	Places	P12		Pedestrian Access: We, together with most other groups, have objected most strongly to the Green Cross concept shown on earlier strategic maps in the original Plan. (Eg. Figures 8 and 10 : P. 19 and 25) with a large south facing arrow across Wormwood Scrubs from the HS2/Elizabeth Line Crossrail station. This potential pedestrian route has been removed from most of the latest maps but is still shown on Figure 3.8 – Proposed Connections and Figure 4.52 – Wormwood Scrubs Place. There is no logic to implying a major pedestrian flow in this location. We note that on other maps including the transport assessment maps, this desire line is shown to the east with a route on or parallel to Scrubs Lane connecting with White City. This route should be relocated to the east and related to the canal bridge indicated south of Hythe Road station – This would also provide a logical connection down the east side of Wormwood Scrubs to Wood Lane and White City.
92	1566	Community Group	Tom Ryland	Hammersmith Society	Places	P12		However there would be an opportunity for the canal towpath to be linked with the Scrubs by adding a green corridor between the two near the eastern edge of the OPDC area and this could even be a continuation southwards of the most eastern of the northsouth routes that are planned for crossing the canal.
92	1567	Community Group	Tom Ryland	Hammersmith Society	Places	P12		Supporting text WS8 identifies “new and enhanced access” “from Old Oak Common Station and surrounds”. The location of the Local Nature Reserve in Wormwood Scrubs makes direct access from the station inappropriate and potentially damaging, therefore neither justified nor effective. Additionally, rail passengers are unlikely to need direct access to the Scrubs – their immediate concern will be to access Crossrail or their home/work. We support the comments of the Friends of Wormwood Scrubs on this point. There is no evidence base for such an access point so its provision is neither justified nor effective.
92	1568	Community Group	Tom Ryland	Hammersmith Society	Places	P12		The previous draft referred to “retaining Wormwood Scrubs as a public open space that is more wild than tamed”. This description of the Scrubs should be integral to informing any intervention or “enhancement” to the Scrubs and should be retained in the Plan supporting text. We have seen no evidence to justify its removal.
92	1569	Community Group	Tom Ryland	Hammersmith Society	Places	P12		P12 and supporting text has moved to an emphasis on “improvements” and “enhancements” to the Scrubs. This suggests a developing policy of a highly “managed” parkland, at odds with the character of Wormwood Scrubs as recognised in the previous draft, and for which there is no justification. The comments of the Friends of Wormwood Scrubs demonstrate how there is no regulatory justification for such an approach
92	1570	Community Group	Tom Ryland	Hammersmith Society	Places	P12		The effects of light from multiple tall towers will be detrimental to amenity in surrounding areas, and particularly to wildlife and amenity on Wormwood Scrubs. This section should address policies to limit light pollution in regard to Wormwood Scrubs. As one resident explained, it is one of the few places in London where you can see the stars and the night sky.
92	1571	Community Group	Tom Ryland	Hammersmith Society	Places	P12		Views to and from Wormwood Scrubs : Views to and from Wormwood Scrubs should ensure that the character of the Metropolitan Open Space is not overwhelmed by tall buildings, Views such as Fig28:p61 (in the Original Draft) would permanently damage the character of Wormwood Scrubs. Tall buildings must be set well back from the perimeter. We have repeated this concern to no avail in our responses to recent planning applications for Mitre Yard and North Kensington Gate.
92	1572	Community Group	Tom Ryland	Hammersmith Society	Places	P12		Only drainage to pitch areas should be considered. It is important to ensure that sustainable drainage measure in the development area do not adversely affect Wormwood Scrubs
92	1595	Community Group	Tom Ryland	Hammersmith Society	Places	P10		We confirm our support for the Cumberland Park Factory Conservation area.
92	1597	Community Group	Tom Ryland	Hammersmith Society	Places	P3		We would like to stress the importance of Canal Conservation Area.
92	1598	Community Group	Tom Ryland	Hammersmith Society	Places	P2		In particular we would hope that at least the Rolls-Royce factory, the canalside warehouses can be retained for alternative uses and the artists’ studios can be retained for use by them. This latter will need some slight re-siting of the proposed Hythe Road station and also that which is required by HS2, which we understand is still being discussed with them.
92	1624	Community Group	Tom Ryland	Hammersmith Society	Places	P1		HS2 and the Elizabeth Crossrail Line: We support in principle the interchange between HS2 and the Elizabeth Crossrail Line on the site but have concerns that the full implications for the station and the area have not been fully considered or resolved. These have already been set out in our comments. There seems to be confusion between the role as a pure interchange point for travellers who are likely to have no interest or involvement in the wider site, and its role as a possible destination within its own right. These roles are not compatible and have implications for the accessibility, space required and setting of the new station.
92	1625	Community Group	Tom Ryland	Hammersmith Society	Places	P1		As we have argued previously, the design and organisation of the station must be of world class quality : We believe that this might best be achieved through an international architectural competition, and are pleased that such a competition is now being undertaken. The importance of extremely high

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								quality of design is not just essential for the predicted 250,000 users a day but will be essential in setting the design bar for the whole OPDC project.
92	1626	Community Group	Tom Ryland	Hammersmith Society	Places	P7C2		We support the various proposals for new London Overground stations at Old Oak Common Lane
92	1627	Community Group	Tom Ryland	Hammersmith Society	Places	P2		We support the various proposals for new London Overground station Hythe Road (subject to moving the proposed site for the station to allow for retention of the existing artists' studios.
92	1628	Community Group	Tom Ryland	Hammersmith Society	Places	P11		The improvements and upgrading to Willesden Junction are still undefined.
92	1629	Community Group	Tom Ryland	Hammersmith Society	Places	P1C1		The pedestrian (and bus) linkages to Old Oak Common, connecting the West Coast Mainline to the HS2 and the Elizabeth Crossrail Line are still undefined
92	1630	Community Group	Tom Ryland	Hammersmith Society	Places	P7		We welcome the proposed upgrading and improvements to North Acton
92	1631	Community Group	Tom Ryland	Hammersmith Society	Places	P4		We welcome the proposed upgrading and improvements to Park Royal.
92	1634	Community Group	Tom Ryland	Hammersmith Society	Places	P1		The question of decking over the major stations and the Elizabeth Crossrail line sidings for development appears to be a major element that must be resolved between the Government, HS2, Network Rail and OPDC as a matter of urgency – together with agreement on who bears the cost. Until such time as these matters are resolved, the Plan as a whole must be regarded as unsound.
92	1636	Community Group	Tom Ryland	Hammersmith Society	Places	P12		We, together with most other groups, have objected most strongly to the Green Cross concept shown on earlier strategic maps in the original Draft Plan. (Eg. Figures 8, 10 : p.19 and 25) with a large south facing arrow across Wormwood Scrubs. There is no logic to implying a major pedestrian flow in this location. Although this 'arrow' has been removed from several maps it is still indicated on Figure 3.8 (P.33) and Figure 4.52 (p136). We note that on other maps including the transport assessment maps, that a desire line is shown to the east with a route on or parallel to Scrubs Lane connecting with White City. We believe this is the correct emphasis.
92	1670	Community Group	Tom Ryland	Hammersmith Society	Places	P3		We have already stated our support for the Canal and River Trust's opposition to allowing long term moorings along the canal.
92	1674	Community Group	Tom Ryland	Hammersmith Society	Places	P4		For example, at a seminar organized by the GUA, Jessica Ferm, Lecturer in Planning and Urban Management, Bartlett Scholl of Planning, advised that there was little scope within Park Royal for intensification on the scale envisaged.
92	1699	Community Group	Tom Ryland	Hammersmith Society	Places	P3		We would hope that boating and canoeing can be introduced on to the Grand Union Canal. (See P3. Canal section above).
93	1736	Residents Association		Wells House Road Residents Association	Places	P8		1.1 Wells House Road Residents Association, an association of residents, that represents the interests of some 400+ Wells House Road residents and landlords directly affected by construction and development from the OPDC Local Plan proposals as well as the HS2 Old Oak Common interchange construction. 1.2 Wells House Road is a triangular cul-de-sac of around 125 Edwardian homes of which 45 are occupied by people who have lived in the street for 25-70 years. At least ten homes are occupied by the children of the original residents and many are caring for elderly parents in these homes. It is a culturally diverse and integrated street. In short, this is a traditional family community that has a strong desire to retain its integrity as such. It should also be noted that many people chose to move to Wells House Road as it is an oasis of peace and quiet, close to West London areas such as Notting Hill, Shepherds Bush and Kensal Rise and with excellent transport connections in Zone 2. There are around 25 children under the age of 18 living in Wells House Road who can be seen and heard playing safely in the street. 1.3 Wells House Road also has exceptional views across London to the London Eye and the Shard. 1.4 It should be noted that Wells House Residents will be at the centre of HS2 and OPDC development for 10-30 years.
93	1742	Residents Association		Wells House Road Residents Association	Places	P8		In order to 'soften the blow', there is a need for a 'buffer zone' of around 100 meters between the existing communities and new developments that will be higher than existing buildings. We require justification of the unreasonable plot ratios and the 'soft area', which has not been included in Reg. 19 despite our repeated requests throughout the consultation. At all costs, OPDC developments should avoid overshadowing, the intensification of pressure on transport, and should revert to the previous agreement in Reg. 18 on sensitive edges. Ideally, OPDC should provide formal limits to the proximity of new developments around sensitive existing communities and move to a policy of green space around new developments.
93	1743	Residents Association		Wells House Road Residents Association	Places	P1		This would include the adherence to the proposed green space between Wells House Road and the HS2 station, as illustrated in promised by Peter Fry of HS2 and other HS2 staff during their consultations. We require justification as to why this minor request is being ignored.
93	1747	Residents Association		Wells House Road Residents Association	Places	P8		We ask that the OPDC acts humanely and works with HS2 to provide ACOUSTIC GLAZING and AIR CONDITIONING for ALL HOUSES in Wells House Road, back & front. See Appendix 1: Air quality.
93	1758	Residents Association		Wells House Road Residents Association	Places	P5 P4		There is a need for justification of why Park Royal can't have some mixed use, e.g. add an extra floor or two to some of the warehouses to include residential or live/work spaces – and underpinning the idea of making the area a contemporary and vibrant neighbourhood for Londoners. OPDC needs to take a more 21st century approach and aim to develop the area into a vibrant community like East London, in order to meet needs of Londoners. This area already includes artists' studios and prop houses, and it could potentially become another Shoreditch where a change to mixed-use is achieved without impacting on existing businesses. This would encourage vibrant cafes and shops to pop up, which would be used by existing workers in the area. This is supported by the impossibility of significantly intensifying land use of Park Royal according to the Industrial Land Study.

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93	1759	Residents Association		Wells House Road Residents Association	Places	P8		We ask for 'sweeteners' for Wells House Residents to see us through the next decades of noise, pollution and disruption. This should include the rebuilding of our retaining wall as a green wall, which will help the entire community deal with noise and pollution. We also ask OPDC to work with Wells House Road residents to discuss other ideas for softening the blows to our already blighted community.
93	1764	Residents Association		Wells House Road Residents Association	Places			There are significant concentrations of poor air quality in terms of NOx exceedances at areas of early and high density planned developments along Scrubs Lane, with an Air Quality Focus Area at the intersection with Harrow Road and Harlesden Town Centre; and another challenging area expected at the Victoria Road/Old Oak Lane area, consequent upon HS2 works. Table 5.1 of the AQS proposes several focus areas for air quality control. Specific monitoring, abatement and mitigation measures should be specifically brought forward into each Place policy.
93	1765	Residents Association		Wells House Road Residents Association	Places	P7		Specific impacts of HS2 are recognised in the Air Quality Study (P28) This is an issue in the "North Acton Place" Policy and the following paragraph (NA.14) could be strengthened (also, developments should not be permitted where air quality exceedances) and brought into the policy box:
93	1766	Residents Association		Wells House Road Residents Association	Places	P4	c)	This form of words from the Park Royal Places policies could be strengthened, brought into the policy box as opposed to supporting text and used more generally: "Policy P4C (1m) Policy P4 (I): Contributing to and/or delivering measures that help support OPDC, the host authorities, and where relevant TfL, to improve air quality monitoring, and overcome issues identified in Local Air Quality Focus Areas around the A40 and A406." To note: PRW9 – encourages a modal shift in Park Royal to address pollution issues]
94	1777	Local Resident	Oonagh Heron		Places	P3		Canal: I'm concerned about the possibility of a 2-way cycling route. I recently signed the local petition about cyclists' behaviour and that so many utterly fail to recognise pedestrian's right of way. Space is already tight and the plan for 'improvement' is not clear enough.
95	1785	Local Resident	Mark Walker		Places	P1	iii	Policy P11(iii) for Old Oak South talks of heights of generally 6-8 storeys fronting directly onto the Grand Union Canal with opportunities for taller buildings at key crossing points but the Plan should just say clearly that residential enclaves like the railway cottages, Midland Terrace and Wells House Road, are not overshadowed by development that is out of scale or over six storeys high.
95	1787	Local Resident	Mark Walker		Places	Site Allocations		Page 50 of this plan has a table of 28 individual Site Allocations but it doesn't clarify site sizes or the housing densities: this doesn't comply with National Planning Policy Guidance (Paragraph 010) which says these details have to be made clear to local communities
95	1789	Local Resident	Mark Walker		Places	P3		I support P3 use of the canal redevelopment but I want clarity over this and proper environmental controls if contractors like Powerday use it for moving construction and other waste material.
95	1790	Local Resident	Mark Walker		Places	P3		I need detail on how P3 will 'improve' southern towpath for the walking and cycling route. The two-way cycling route needs more space, especially as cyclists are so aggressive to pedestrians who are supposed to have right of way. TITRA members have already petitioned the OPDC and Ealing Council on this issue.
95	1791	Local Resident	Mark Walker		Places	P7		I object to P7's current early-stage proposal from TfL for a 9 metre-wide cycle/pedestrian bridge from the Old Oak Common Overground Station. Initial proposals were for a tunnel given the sensitivity of the Midland Terrace/Shafesbury Gardens locations - this should be further explored.
95	1792	Local Resident	Mark Walker		Places	P9		In Policy P9 on Channel Gate, TITRA sees the designation of parts of the area as SIL as being inflexible to changing economic needs, and in conflict with ensuring air quality / no pollution in the railway cottages enclave. This policy could also conflict with P9 sub-policies on Public Realm and Movement (P9g) and Green Infrastructure (Policy P9 h).
95	1793	Local Resident	Mark Walker		Places	P9	g)	I support Policy P9g strengthening access points into Channel Gate from Atlas Road. In the long-term, I want to see Channel Gate Road itself closed altogether, given its polluting nature after HS2 was finished with it.
96	1810	Local Resident	John Cox		Places	P4		You say in general that: "Within ... places, a series of 'clusters' are identified. Clusters are characterised as locations that are likely to attract higher footfall and/or have a particular use and as such, warrant more detailed policy. These places and clusters celebrate their respective distinctiveness in terms of their current context and future development approaches." On that basis, I think you should define an extra cluster within the place 'Park Royal West', namely: P4C2: Acton Lane East Cluster By analogy with cluster P4C1, it would provide the more detailed policy for Acton Lane from the boundary of the OPDC at Harlesden station, over the West Coast Main Line (WCML) railway bridge, and include buildings around the junction of Acton Lane with North Acton Road and Barretts Green Road. As its 'Vision', it should say: "A high quality and legible entry point from Harlesden railway station and roads leading to North Circular Road, Craven Park and Harlesden beyond. New and upgraded development will create a positive identity for and transition into, the wider Park Royal industrial area and respond to the area's industrial heritage. New and vastly improved street frontages will improve the lengthy sterile and unattractive section of Acton Lane for passengers leaving Harlesden station, to create a more attractive public realm. It would provide Acton Lane with a greater sense of place, rather than just one of movement. New 'no-car' employment uses will play a key role in successfully integrating this area with, and mediating between, the edge of the OPDC area with other parts of Park Royal, enhanced by expanding existing canal-side food and drink (pub and restaurant) provision." Development of the Acton Lane East cluster can be optimised to take advantage of its proximity to Harlesden station, and the substantial number of bus routes (six!) over Acton Lane WCML bridge.
96	1811	Local Resident	John Cox		Places	P4		In addition, the current OPDC criterion for consideration of 'site allocations' is unexpected, arbitrary, and at variance with the criteria of neighbouring local planning authorities ("small is good as well"). It is unfair to exclude smaller sites. On that basis, the P4C2 cluster should consider site allocations for the land on both sides of Acton Lane in front of the United Biscuits plant and (much more of a challenge) Willesden substation. That would allow active frontages where there currently are none at all. The task there is to urbanise the immediate

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								surroundings of Harlesden station, as much as is commercially feasible. The OPDC must not just concentrate on its more ambitious growth sites.
96	1812	Local Resident	John Cox		Places	P4		There is much the same argument about another possible new cluster: P4C3: Stonebridge Park Station This would again aim to provide 'no-car' commercial development in this very unattractive urban landscape in further innovative ways, including the provision of low-cost premises for arts and crafts. The list of extra clusters does not need to go any further; it merely includes areas around two boundary railway stations that require more specialised planning policy than their general Park Royal hinterlands. It includes more intensive development and making safe and attractive walking and cycle routes. It provides more detailed planning policy than the OPDC has hitherto been willing to provide to Park Royal.
96	1813	Local Resident	John Cox		Places	P4	b)	Areas identified for intensification should be highlighted in the plan P4(b).
96	1814	Local Resident	John Cox		Places			Protecting the SIL is welcomed but as it is, it's too focused on car use. Alternatives to car use should be encouraged and provided as well as improvement made. This could include (in the policy) encouragement of free cycle banks, shared car use and bus shuttles from the stations. New developments should be designed as virtually car free (meaning both industrial and residential sites).
96	1815	Local Resident	John Cox		Places	P4	g)	The policy on public realm and movement is broadly supported – but improvements to roads and pavements need to be of high priority and factored in as an early stage of the developments. (This should be highlighted in the section on Development and Phasing.) Pavements particularly are of poor quality, often covered by parked cars. Given the increasing local population, they need to be designed with accessibility and inclusion in mind (in respect of disabled and older people and those with young children and buggies). Better access between existing Park Royal and the future redevelopment area of Old Oak should be prioritised. P4(g)
96	1816	Local Resident	John Cox		Places	P4		Air quality needs to be monitored here.
97	1817	Local Resident	Ralph Scully		Places	P8		1.1 Wells House Road Residents Association, an association of residents, that represents the interests of some 400+ Wells House Road residents and landlords directly affected by construction and development from the OPDC Local Plan proposals as well as the HS2 Old Oak Common interchange construction. 1.2 Wells House Road is a triangular cul-de-sac of around 125 Edwardian homes of which 45 are occupied by people who have lived in the street for 25-70 years. At least ten homes are occupied by the children of the original residents and many are caring for elderly parents in these homes. It is a culturally diverse and integrated street. In short, this is a traditional family community that has a strong desire to retain its integrity as such. It should also be noted that many people chose to move to Wells House Road as it is an oasis of peace and quiet, close to West London areas such as Notting Hill, Shepherds Bush and Kensal Rise and with excellent transport connections in Zone 2. There are around 25 children under the age of 18 living in Wells House Road who can be seen and heard playing safely in the street. 1.3 Wells House Road also has exceptional views across London to the London Eye and the Shard. 1.4 It should be noted that Wells House Residents will be at the centre of HS2 and OPDC development for 10-30 years.
97	1823	Local Resident	Ralph Scully		Places	P8		In order to 'soften the blow', there is a need for a 'buffer zone' of around 100 meters between the existing communities and new developments that will be higher than existing buildings. We require justification of the unreasonable plot ratios and the 'soft area', which has not been included in Reg. 19 despite our repeated requests throughout the consultation. At all costs, OPDC developments should avoid overshadowing, the intensification of pressure on transport, and should revert to the previous agreement in Reg. 18 on sensitive edges. Ideally, OPDC should provide formal limits to the proximity of new developments around sensitive existing communities and move to a policy of green space around new developments.
97	1824	Local Resident	Ralph Scully		Places	P1		This would include the adherence to the proposed green space between Wells House Road and the HS2 station, as illustrated in promised by Peter Fry of HS2 and other HS2 staff during their consultations. We require justification as to why this minor request is being ignored.
97	1828	Local Resident	Ralph Scully		Places	P8		We ask that the OPDC acts humanely and works with HS2 to provide ACOUSTIC GLAZING and AIR CONDITIONING for ALL HOUSES in Wells House Road, back & front. See Appendix 1: Air quality.
97	1839	Local Resident	Ralph Scully		Places	P5 P4		There is a need for justification of why Park Royal can't have some mixed use, e.g. add an extra floor or two to some of the warehouses to include residential or live/work spaces – and underpinning the idea of making the area a contemporary and vibrant neighbourhood for Londoners. OPDC needs to take a more 21st century approach and aim to develop the area into a vibrant community like East London, in order to meet needs of Londoners. This area already includes artists' studios and prop houses, and it could potentially become another Shoreditch where a change to mixed-use is achieved without impacting on existing businesses. This would encourage vibrant cafes and shops to pop up, which would be used by existing workers in the area. This is supported by the impossibility of significantly intensifying land use of Park Royal according to the Industrial Land Study.
97	1840	Local Resident	Ralph Scully		Places	P8		We ask for 'sweeteners' for Wells House Residents to see us through the next decades of noise, pollution and disruption. This should include the rebuilding of our retaining wall as a green wall, which will help the entire community deal with noise and pollution. We also ask OPDC to work with Wells House Road residents to discuss other ideas for softening the blows to our already blighted community.
98	1846	Strategic Partner	Adam Price	Transport for London (Commercial Development)	Places	SP4; SP5; SP9; Site allocations; P1; P1C1; P3; TCC4		While we will work with OPDC should any opportunities and funding arise sooner, the presumption must be that future commercial and residential development in conjunction with continuing operational use of the Elizabeth line depot site in reality could only come forward in the longer term. With the exception of design and consents activity, this will be beyond the Local Plan period. This presumption needs to be reflected in Strategic Policies, in site allocations for Old Oak South in the Places chapter and in the delivery programme. All references to the Elizabeth line depot site being delivered as part of the current Local Plan should therefore be removed. With the above in mind the following Policies and text should be amended to reflect this.

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
98	1847	Strategic Partner	Adam Price	Transport for London (Commercial Development)	Places	Site allocations	Site allocations table and figure 4.2	Within the table on page 50 of the document, Site 10 Old Oak South (Elizabeth Line Depot and sidings and Old Oak Common Station and Surroundings) should be amended to reflect that no housing units of commercial floor space can be delivered on the Elizabeth Line Depot within the plan period. The site boundary as shown on Figure 4.2: Site Allocations should also be updated to reflect these changes.
98	1848	Strategic Partner	Adam Price	Transport for London (Commercial Development)	Places	P1		Whilst TfL CD support the vision and principles set out within Policy P1, for reasons set out above, the Policy must take into consideration that the Elizabeth Line depot can only be bought forward for development in the longer term. The number of jobs and units set out within the Policy and supporting text must therefore be updated to reflect this.
98	1849	Strategic Partner	Adam Price	Transport for London (Commercial Development)	Places	P1	OOS.20	Supporting text OOS.20 also identifies either Old Oak Common station site or Elizabeth Line Depot and sidings as the most appropriate site for delivery of a primary school. Whilst we recognise there may be a need for primary school provision across the OPDC area, alternative sites should be considered given the uncertainty and long term delivery of the Elizabeth Line Depot site.
98	1850	Strategic Partner	Adam Price	Transport for London (Commercial Development)	Places	P1	OOS.20	In addition, consideration should be given to the significant cost associated with the provision of a viable development platform needed to allow development of this nature to come forward above the depot whilst, crucially, safeguarding the operational requirements of the depot. If deemed appropriate, a statement of common ground could be agreed.
98	1851	Strategic Partner	Adam Price	Transport for London (Commercial Development)	Places	P1C1		We strongly support the policy wording in section M of Policy P1C1 which discusses the need for the station to be resilient and adaptable to respond to a changing context, including the Elizabeth Line Depot and sidings. However, we would like to ensure that no development on neighbouring sites precludes future development potential of the Elizabeth Line Depot and therefore suggest additional wording within this policy as follows: "Any proposals which come forward in advance of the redevelopment of the depot site should not preclude development of the site and should seek to create opportunities for comprehensive redevelopment, in the interests of good planning and place-making".
98	1852	Strategic Partner	Adam Price	Transport for London (Commercial Development)	Places	P1C1		As set out in Policy P1C1 we strongly support high density housing within the area. However, it should be made clear that any railway station development within the OPDC area (redeveloped or new) should provide the flexibility for high density development both over and around transport interchanges in the interests of optimising these sites and making more efficient and sustainable use of the increasingly limited developable land in London. To this end, there should be less focus on providing architecturally iconic or 'feature' standalone station buildings, as alluded to within policy P1C1 of the Local Plan, where these sites can provide greater provision of residential and commercial space while still acting as landmark buildings in area legibility terms.
98	1853	Strategic Partner	Adam Price	Transport for London (Commercial Development)	Places	P7		Policy P7 identifies the potential for tall buildings around North Acton Station. We support this policy approach. However, in the interests of clarity and in making the most efficient use of available land, we would like to amend the text as follows "The area will see high quality tall buildings being delivered in appropriate locations, including the station site, with high density housing being the main land use along with new hotel and student accommodation".
99	1868	Residents Association	John Haston	West Twyford Residents Association	Places	P3		The Grand Union Canal must be refurbished and opened up to make it the family place the OPDC want it to be. Pictures of cycling and walking along the canal may not happen as shown in the artistic illustrations. It may not be possible because there is not enough width on the bank to accommodate walking and cycling – with mooring space provision - at the same time. Proper drawings marked up with indicative ideas to scale, would show where this is not possible.
99	1869	Residents Association	John Haston	West Twyford Residents Association	Places	P3		Marinas and boating facilities must be encouraged in the adjacent developments to bring life back into the canal and attract visitors – rather than discourage them as happens - when they pass some of the less reputable food factories in Park Royal.
100	1873	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places			This same lack of justification applies to the housing target figures included in the Place chapters of the Plan, for Old Oak South (Policy P1), North Acton and Acton Wells (Policy P7), Old Oak Lane/Old Oak Common Lane (Policy P8), Scrubs Lane and its associated 'clusters' (Policy P10).
100	1874	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P2		The housing targets or Old Oak North (Policy P2) appear more realistic and acceptable having been reduced by a third by the landowners from their original proposals (see paragraphs 9-21 below).
100	1899	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	Site allocations		National Planning Policy Guidance states (Paragraph 010 Reference ID: 12-010-201403060) Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions). The Regulation 19 Local Plan at page 50 includes a table of 28 individual Site Allocations. These will be critical to future development management decisions. The table provides information on the number of housing units allocated to each site. A map on the preceding page shows the location of each site. The table conspicuously fails to provide information on the size of each site ³ , or the housing density that will result from the proposed housing allocation. Again, this leaves the reader of the Draft Plan unable to assess whether these sites are likely to be built out at densities anywhere close to London Plan Density Matrix levels, or at what range of building heights. As noted above, experience to date in relation to LB Ealing's decisions on granting permissions at North Acton and the OPDC decisions to date on the Oakland site and for a series of residential towers in Scrubs Lane (defined as a sensitive edge in the Regulation 18 Draft) has been that densities will routinely exceed London Plan Matrix levels, and also the higher levels that have become common in areas of intensification and Opportunity Areas. Details are given in the table (shown overleaf). On the basis of this section of our response, we consider that the current Regulation 19 Local Plan is not consistent with national policy, in terms of clarity and transparency and is as a result unsound.

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
100	1920	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places			We welcome a Local Plan which provides a specific focus for each Place within a wider area. But in our view the level of detail and prescription included in these chapters is not appropriate to a Local Plan. If this level of detail is to be retained, it should be in the form of a series of Area Action Plans and neighbourhood plans.
100	1921	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places			The current Regulation 19 Draft goes far beyond setting out broad locations and specific allocations of land for different purposes (NPPG 002). There remain enormous uncertainties over future development at the heart of Old Oak, in terms of costs and viability of infrastructure around Old Oak Common station. To adopt a Local Plan which fixes the detail of pedestrian routes and cycleways, and which prescribes very detailed policies for 10 Places would seem a hostage to fortune unless the intention is that these parts of the Plan are reviewed every 2-3 years.
100	1923	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P1		We support the principle of relatively high density development around the proposed rail interchange and station, but question assumptions that this should contribute to the delivery of 41,300 new jobs and a minimum of 3,000 new homes. The precision of the former number gives an artificial impression that if a rail interchange is built, a specific number of new jobs will follow. As we understand, the reality remains that if relocation of the Crossrail depot is not viable, and overdecking not feasible, then planning policies for Old Oak South will need to be re-assessed. The same applies to questions on the feasibility of building above the HS2 station. Uncertainties in the London commercial office market are added reasons for a more evolutionary approach.
100	1924	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P1		We support Policy P1h on delivering a range of meanwhile active uses across Old Oak South. Such uses may prove 'meanwhile' for a long time to come.
100	1925	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P1		On Policy P1l) on Building Heights, it is notable that a building height range of 6 to 8 storeys fronting directly onto Grand Union Canal is made explicit at sub-paragraph (iii), while no similar figures are provided in relation to the delivery of the tallest buildings around Old Oak Common Station at sub-paragraph (i) or the range of building heights including tall buildings at points of the greatest activity across Old Oak South at sub-paragraph (ii). The public are left guessing.
100	1926	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P2		The interim forum has participated in the series of four consultation exercises undertaken by Cargiant/London & Regional Properties on their masterplan for 'Old Oak Village'. The quality of engagement has been deeper and more productive than with most developers. We support the viaduct option as being critical to opening up the site and allowing permeability.
100	1927	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P2	P10	The proposed housing target for the development has dropped from 9,000 to the 6,300 now reflected in the Regulation 19 Local Plan. Unusually, this is an example to be welcomed of a LPA retro-fitting Local Plan policies around developer aspirations. This process may however have led a 2,700 home target being shifted into neighbouring Scrubs Lane, with much less welcome consequences.
100	1928	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P2	E1	We strongly support Policy P2d(v). A long established community of artists and makers have studio and workshop space in buildings in Hythe Road and Scrubs Lane. Accompanying Policy E1, unless further strengthened, will not ensure that re-provided floorspace in new developments is at rents realistic for these users. E1 needs to be strengthened to ensure 'affordable workspace'. achieved through planning conditions and S106 agreements. Other London Boroughs have been down this route, and the significant contribution to regeneration of an area, made by artists and makers, is well evidenced in East London.
100	1929	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P2C1		We consider Policy PC21 for the 'Grand Union Square Cluster' to be over-detailed for a Local Plan and more suited to a planning brief, to be developed as part of the OPDC masterplan for Old Oak and recognising the work already undertaken by Cargiant/London & Regional Properties.
100	1931	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P3		The Interim Forum welcomes the overall vision for the canal, but the potential of the canal for movement of materials and waste during the decades of construction at Old Oak is insufficiently covered in Policy P3. Our Forum requires Policy P3 to provide more clarity over traffic levels and enforcement of environmental legislation as contractors begin to use the canal for moving construction materials.
100	1932	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P3		Policy P3h) does not explain how the southern towpath can be further 'improved' as 'a continuous east west walking and cycling route as part of the National Cycle Network and proposed TfL Quietway'. A 3.5m 2-way cycling route is unfeasible at the many pinch points along the towpath (e.g. bridges). Pedestrian/cycle conflict along this route is already a real issue.
100	1933	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P3		Policy P3o) on Building Heights has already been compromised by OPDC planning approvals for tall residential towers at North Kensington Gate and Mitre Yard, adjacent to the canal. If 'opportunities for tall buildings' are taken up at five further 'crossing points' (a suggested by the policy) any remaining views and vistas along the canal will be lost.
100	1934	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P4		Given the nature of current uses and activities in this area, we have severe doubts about the realism and effectiveness of Policy P4(f) of rationalising, minimising or removing onstreet parking, where possible and practicable, to make space for walking, cycling and public realm improvements. Park Royal has always relied on vehicle movement and is a hostile environment for pedestrians.
100	1935	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P5		Our interim forum sees the area relabelled in the Regulation 19 Local Plan as P5 Old Park Royal as an area well suited to carefully managed mixed use. The OPDC 'vision' for this 'Place' is The enhancement of buildings along with improvements to the public realm and movement network will support a functional and exciting place that helps to mediate the transition between Old Oak and Park Royal West (page 88 of Draft Local Plan). We feel that this 'transition' approach should be taken further, and that Draft Policy P5(a) of 'protecting SIL' should not be applied to the Old Park Royal Place. We suggest that Old Park Royal is de-designated as SIL to allow for a wider range of uses.
100	1936	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P5		As the Draft Plan states: Old Park Royal was largely developed during the early 20th Century and its character is highly distinctive from the rest of the industrial area of Park Royal West. It is home to a number of historically significant buildings linked to its industrial heritage. As the Industrial Land Review makes clear (Supporting Study No.25) the scope for intensification in this part of Park Royal is limited given narrow streets and lack of yard space. Current employment and industrial uses are very mixed, while often small-scale businesses in low rise premises from the 1920 and 1930s. The streets are not wide and are unsuited to large HGVs and distribution vehicles, as compared with the more modern road network of Park Royal West. Traffic jams and congestion are frequent, impacting in particular on the residential enclave of the Wesley Estate. Policy P5d)iii) on providing more generous pavement widths is seen as desirable but unachievable in practice.

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100	1937	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P5		We support the designation of the proposed St Leonards Road Conservation Area.
100	1938	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P5		Local people see Old Park Royal as well-suited to transform into a lively and successful 'artisan quarter' providing employment space mixed with residential floorspace. Such accommodation, could be achieved through conversion and refurbishment of existing buildings and premises, which would remain (by London standards) relatively inexpensive to rent or purchase.
100	1939	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P6		Our Forum supports Policy P6 b) seeking to deliver "new social infrastructure and/ or protecting and enhancing existing social infrastructure provision, including facilities at Central Middlesex Hospital in accordance with policy TCC4."
100	1940	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P6		We support Policy P6 e) "embedding green infrastructure across the area, particularly along key routes" since the centre is not welcoming to the visitor.
100	1941	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P7		The residential enclaves to the east of the rail line (Midland Terrace/Shafesbury Gardens and Wells House Road) have been designated by OPDC as part of the Old Oak Neighbourhood Area (a 22 hectare area very much reduced from the 280 ha area applied for). As noted above, the interim forum does not accept that Policy P7 and its sub-paragraphs can appropriately be deemed as 'strategic policy'. The level of detail does not accord with NPPG guidance on what makes a policy strategic? (Paragraph: 076 Reference ID: 41-076-20140306). The level of detail in e.g. Policy P7g) to j) on Public Realm and Movement may prove to be a sound assessment of the requirements for pedestrian and cycle 'connectivity' in this Place. Equally it may not. Local residents have much knowledge to offer, and many to views to be balanced, in judging where proposals for such connectivity will or will not succeed. A neighbourhood plan should be given the space to bring forward detailed proposals on these issues.
100	1942	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P7		Policy P7b)ii) earmarks this 'Place' as a location for delivering appropriate levels of student accommodation in accordance with Policy H10. Policy H10 a)iv) supports student housing where this does not result in an overconcentration in any one specific location. We do not consider these policies to be justified, for the reasons below. In the view of local residents, the concentration of student housing at North Acton is already beyond excessive, with a further permission granted recently to Imperial College for 'around 740 students and 85 rental apartments'.
100	1943	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P7		Coupled with approvals granted by LB Ealing for an extended cluster of very tall buildings, sited around a major road gyratory, North Acton has acquired a reputation amongst local people as to how not to regenerate London. The areas of 'public realm', cramped and squeezed between tall buildings, are windswept and poorly maintained. Large volumes of ground floor A1 retail space, intended to 'activate' the area, remain vacant several years after the construction of their parent buildings. The retail offer is geared to the student market with a predominance of fast food outlets and coffee shops. Evidence of long-term residents and families on the street is limited. For North Acton, the OPDC Local Plan comes too late in the day to have significant impact.
100	1944	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P7C1		For Acton Wells and Victoria Road, there remains scope to create a better local environment. Much will depend on the decision on what is understood to be planned as an east-west 9-metre wide cycle/pedestrian bridge from Old Oak Common Station, at high level above the railway line, as part of the 'Old Oak High Street' connection between the HS2/Crossrail station and North Acton Station. The detailed design and location of the proposed Old Oak Common Lane Overground Station will also be critical for residents of Midland Terrace/Shafesbury Gardens.
100	1945	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P7		As with other Place Chapters, our view is that Policy P7 should be included in an Area Action Plan or SPD, allowing for more frequent revision than when incorporated within a full Local Plan. Such a document would sit alongside the proposed Old Oak Neighbourhood Plan. As a minimum, the Local Plan should make clear that policies in Place chapter 4 are 'non-strategic' thereby allowing for neighbourhood plan policies (post examination and referendum) to have precedence in accordance with NPPF paragraph 185.
100	1946	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P8		As the 'vision' for Policy P8 states, this is a 'Place' which requires 'sensitive integration' between existing and new development. The interim forum supports this aim and it will be a key objective of any Old Oak Neighbourhood Plan.
100	1947	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P8		This 'Place' is close to site of the proposed Old Oak Common Station and the tallest buildings envisaged by OPDC at the centre of old Oak South. A 'buffer zone' is needed between this location and the low rise terraces of Wells House Road and Midland Terrace.
100	1948	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P8		The forum supports the proposed 'Atlas Junction neighbourhood town centre', an idea put forward in the Forum's response to the Regulation 18 Local Plan.
100	1949	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P8		The same status as 'non-strategic' policies should be applied to the sub-paragraphs of Policy P8 as for other Place policies, for the reasons set out above.
100	1950	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P8		Policy P8a)iii) restricting 'town centre' uses to land at Atlas Junction neighbourhood centre 'outside of Strategic Industrial Locations (SIL)' should be dropped. It is too early to say, when such a location is being re-planned, that uses of certain sites should be restricted in this way. It may make sense to locate a retail of D class 'town centre' use on one site, and to replace employment floorspace on another. An over-rigid zoning of SIL, within a small area such as a 'Place' can hamper good planning outcomes.
100	1951	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P8		The same point applies to the Harlesden bus depot site, as covered in P8(c). The Harlesden Neighbourhood Plan should be allowed some flexibility on uses of this site.
100	1952	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P8		It is notable that the Local Plan supports a future mixed use neighbourhood on the Westway Estate, while resisting any element of mixed use in e.g. Old Park Royal. We see these varying approaches as resulting from historic designations of SIL boundaries, rather than sound

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								planning justifications. There is no explanation given in the Reg 19 Local Plan as to why two such areas should be treated differently – given their built form, street layout and current uses.
100	1953	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P8C1		Policy P8C1 is a very detailed policy for the proposed Atlas Junction Town Centre Cluster. It includes sub-paragraphs relating to specific buildings and sites, none of which are large or 'strategic' sites. This is part of the OPDC area designated as a 22 hectare neighbourhood area in September 2017. As with other Place chapters we feel that the level of detailed policy is inappropriate to a Local Plan, in terms of NPPF guidance. NPPF paragraph 185 states Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation. In this context, we consider that sub-policy P8C1 should be dropped from the Regulation 19 Local Plan in order to allow policy to be developed through the neighbourhood planning process.
100	1954	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P8C1		The Old Oak Neighbourhood Forum will be working with the new occupants of the Collective building, the Oaklands development (construction starting 2018) and the Harlesden Neighbourhood Forum on plans for an area in which existing and new residential and commercial buildings need to be integrated sensitively.
100	1955	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P9		The eastern part of this 'Place' forms part of the designated Old Oak Neighbourhood Area. As explained above we consider that an over-detailed set of policies in a Local Plan will not only conflict with NPPF guidance on avoiding 'duplication' but also risks including policies that are inappropriate for a Local Plan which would not normally be revised within 5 years.
100	1956	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P9		Much of the land to the north and west of this 'Place' is potentially or definitely required by HS2 for a construction compound and other requirements. We accept the reality of Policy P9a). As for Old Park Royal, we agree with the view at CG2 of the supporting text and see this Place as a transition area between Park Royal and Old Oak. As such we consider the blanket designation of parts of the area as SIL as being inflexible and in tension with other P9 sub-policies on Public Realm and Movement (P9g) and Green Infrastructure (Policy P9 h).
100	1957	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P9		The uses defined in London Plan Policy 2.79 on SIL appear to us to be too narrow to cover the range of employment activities for which there will be demand for floorspace in this part of London over the coming years. We do not see these limitations as being conducive to the establishment of an industrial innovation area at Channel Gate (Policy P9c).
100	1958	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P9		As in other parts of the Plan we see Policy P9j) as being not justified in the absence of any clarity as to the parameters of a variety of building heights.
100	1959	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P9		We support the policy of creating a permeable street network and strengthening access to Channel Gate from Atlas Road (Policy P9g).
100	1960	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P9		In the long-term local residents would wish to see Channel Gate Road shut down once HS2 no longer has requirements for this land.
100	1961	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P9		Policy EU6 on waste commits to complying with the West London Waste Plan and safeguarding the waste sites in the Channel Gate 'Place' and Powerday at Old Oak Sidings. Obviously the presence of these sites has created long-term problems of pollution from waste disposal, not always managed and controlled in accordance with legislation while it is questionable whether the Channel Gate sites, on Network Rail land, have ever been properly regulated.
100	1963	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P10		Scrubs Lane, along with Victoria Road, are two areas for which OPDC commissioned external consultants in 2015 to prepare detailed studies. The outcomes were published as 'direction of travel documents'. The subsequent Scrubs Lane Development Framework Principles is Supporting Study No.38 to the Reg 19 Local Plan. As such this remains an evidence base document rather than a SPD. A Scrubs Lane SPD is due to be consulted on late 2017/2018. Meanwhile Scrubs Lane has been the focus of substantial development activity. Major residential/mixed use developments have been approved for two sites at North Kensington Gate (North and South) and at Mitre Yard (see table at 7.19 above). A third application at 2 Scrubs Lane awaits decision as at September 2017. These applications have been approved on the basis of 'emerging policy' in the Scrubs Lane Development Framework Principles Document and the emerging Reg 19 Local Plan. Draft policies in the Regulation 18 Local Plan were disregarded. Objections to these applications, from LBHF, RBKC and local residents have included the fact that decisions are premature in advance of public consultation on either the 'Development Framework Principles Document' or the Regulation 19 Local Plan. The 'vision' and draft policies for Scrubs Lane in the Regulation 18 Plan, as a 'sensitive edge' and 'a pleasant street, respectful of surrounding heritage assets, with a high quality public realm' have not come to pass (see CGI image below).
100	1964	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P10		As with other Place chapters, we consider the sub-paragraphs of Policy 10 to be too detailed to be appropriate for inclusion in a Local Plan. These policies are in any event being proposed after the event, reflecting planning permissions already granted. This applies especially to Policy P10b) introducing the concept of 4 'clusters' along the length of Scrubs Lane and Policy P10j) on Building Heights which allows 'a single tall building in each cluster'. The locations of these clusters reflect land holdings acquired by developers, rather than being 'plan-led'. We consider these policies to be not justified on the basis that the 'cluster' concept is an artificial one and because of lack of evidence that these locations in Scrubs Lane are any more 'active' or 'distinctive' than other parts of the street.
100	1965	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P10		As the Reg 19 Plan notes (para SL.6 page 121), Scrubs Lane is currently a key connector route. It is also the location of the Network Rail owned private road leading to the EMR and Powerday waste sites. The HGVs accessing and egressing from this site dominate traffic conditions in Scrubs Lane, requiring traffic to be marshalled and traffic halted, with HGVs stacked in queues awaiting entry to the access road. With this stationary highly polluting traffic, a scenario likely to remain for many years until an alternative access road is built, the idea that this is suitable location for high density residential towers has been greeted with disbelief by local residents. LBHF as Highways Authority has submitted strong objections to the series of planning applications for developments in Scrubs Lane, on the grounds that these are

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								premature until a comprehensive new road layout, allowing for deliveries and servicing at what is destined to be a series of four approx 20 storey residential towers, has been planned and agreed between the Borough and OPDC.
100	1966	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P10		Policy P10f)ii) proposing a continuous and generous 5m wide footpath and 4 metre wide two way segregated cycleway with associated junction requirements needs to be seen in this light. While we support delivery of such a cycle route, local residents have doubts of its feasibility given roadwidths and other factors. Such a policy, with specific dimensions, is inappropriate to a Local Plan and should be left to a future SPD, Area Action Plan, or neighbourhood plan.
100	1967	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P10		The Interim Forum considers Policy P10j) allowing 'a single tall building in each cluster identified in P10b to be not justified). The case for tall buildings has been resisted strongly by Historic England as well as by RBKC and LBHF. The planning permissions already granted we see as incompatible with draft policy P10i) which commits to conserving and enhancing St Mary's Cemetery, Grand Union Canal, and Cumberland Park Conservation Areas. There is now no realistic prospect of development in Scrubs Lane conserving and enhancing these areas. The question has been whether the level of harm will be significant or substantial.
100	1968	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P10		Draft Policy P10e) has very limited justification provided in the supporting text. Paragraph SL.5 states: To the south of the canal and east of Scrubs Lane, the regeneration of the Mitre Industrial Estate has the potential to deliver new housing alongside other uses reflecting its proximity to Little Womwood Scrubs. This is the sole explanation as to why this relatively small industrial estate, purpose built in the 1980s and comparatively modern, requires 'regeneration' or why housing use on the site should be considered when the Local Plan defends from any residential use every square metre of floorspace in outdated 1920s/30s industrial buildings in e.g. Old Park Royal. The policy in this sub-paragraph we view as not justified.
100	1969	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P10		Policies P10C1 for each of the four 'clusters' along Scrubs Lane we consider to be far too detailed for inclusion in a Local Plan and at a level of specificity more appropriate to a site planning brief or neighbourhood plan.
100	1970	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P11		We support the views of the Harlesden Neighbourhood Forum on this 'Place'.
100	1971	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P12		The interim forum supports Policy P12a) that any proposals need to be agreed with the Wormwood Scrubs Charitable Trust as well as LB Hammersmith & Fulham. Given the importance of achieving 'sensitive' enhancements to the Scrubs, the constitution of the trust and the question of voting right may need further review.
100	1972	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P12		Detailed plans for the future of the Scrubs could benefit greatly (in our view) from being addressed via a neighbourhood plan. We do not agree with the argument made by OPDC for removal of the Scrubs (as a 'strategic site') from the boundary of the originally proposed 275 hectare Old Oak neighbourhood area. The Scrubs as MOL are not a 'strategic site' by any common definition of this term, and in any event NPPG 036 allows for inclusion within a neighbourhood area of sites designated as 'strategic'. Following removal of the Scrubs from the proposed Old Oak neighbourhood area, consultation with the Friends of Wormwood Scrubs will become even more essential.
100	1973	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P12		Local residents are the people who observe use of the Scrubs day by day, including the passage and desire lines of pedestrians and cyclists. To seek to curtail involvement of the local community in plans for it future has been a very unhelpful decision by OPDC.
100	1974	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Places	P12		The eastern side of the Scrubs, along Old Oak Common Lane, is not well used because of problems of litter, anti-social behaviour, and is currently a threatening environment for the public. Enhancements need to be accompanied by much more effective management.
102	2097	Community Group	Jacky Peacock	Harlesden Lets	Places	P7		In consultation events on the regulation 18 Local Plan where residents expressed concerns about over concentration of student housing in North Acton officers said that they would ensure that communities are mixed and balanced and not dominated by one housing typology or tenure. Mention of discouraging student housing in North Acton was made. The current policy fails to protect against a mono-type of housing form developing in the area.
103	2104	Local Resident	Dave Turner		Places	P1	iii	Policy P1l(iii) for Old Oak South talks of heights of generally 6-8 storeys fronting directly onto the Grand Union Canal with opportunities for taller buildings at key crossing points such as Old Oak High Street but this is the exception. The plan should say clearly that residential enclaves like the railway cottages, Midland Terrace and Wells House Road, are not overshadowed by development that is out of scale with them OR more than six storeys in height throughout.
103	2106	Local Resident	Dave Turner		Places	Site Allocations		Page 50 of this plan has a table of 28 individual Site Allocations but it doesn't clarify the site's size or the housing density: this doesn't comply with National Planning Policy Guidance (Paragraph 010) which says these details have to be made clear to local communities.
103	2108	Local Resident	Dave Turner		Places	P3		TITRA welcomes Policy P3 use of the canal in Old Oak's redevelopment but wants clarity/future environmental controls if contractors use it for moving construction and other waste material – from wharves such as Powerday.
103	2109	Local Resident	Dave Turner		Places	P3		We think P3 needs to show how the southern towpath will be 'improved' to create an 'east-west walking and cycling route'. We question how a two-way cycling route can be delivered when space is so limited – especially where the bridges constrict the towpath. Conflict over the towpath is a problem, so much so that TITRA members have petitioned the OPDC and Ealing Council over the aggression shown by cyclists towards pedestrians that they have petitioned the OPDC and Ealing Council on this issue.
103	2110	Local Resident	Dave Turner		Places	P7		TITRA objects to P7's current early-stage proposal from TfL for a 9 metre-wide cycle/pedestrian bridge from the Old Oak Common Overground Station connecting the HS2/Crossrail station and North Acton Station. Initial proposals were for a tunnel give the sensitivity of the Midland Terrace/Shafesbury Gardens locations - this should be further explored.
103	2111	Local Resident	Dave Turner		Places	P9		In Policy P9 on Channel Gate, TITRA sees the designation of parts of the area as SIL as being inflexible to changing economic needs, and in conflict with ensuring air quality / no pollution in the railway cottages enclave. This policy could also conflict with P9 sub-policies on Public Realm and Movement (P9g) and Green Infrastructure (Policy P9 h).

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103	2112	Local Resident	Dave Turner		Places	P9	g)	TITRA supports Policy P9g seeking strengthening access points into Channel Gate from Atlas Road. In the long-term, our association wants to see Channel Gate Road itself closed altogether, given its polluting nature and its associated anti-social behaviours, once HS2 no longer has requirements for this land.
104	2123	Community Group	Del Brenner	Regents Network	Places	P1		The plans for an extensive rail interchange will certainly be a major focus for development of the area, but an airport style terminal cannot provide the heart of the development, and the aspirations of an Old Oak 'neighbourhood' need to be achieved.
104	2131	Community Group	Del Brenner	Regents Network	Places	P3	T8	The prospects of the return of canal freight are very encouraging, although it may be difficult to exceed the historic trade figures to begin with. Undoubtedly, in due course canal freight could have a multi million benefit to the economy of London.
104	2132	Community Group	Del Brenner	Regents Network	Places	P3		A local water transport service is being set up along the Grand Union Canal focussed around the very commercially busy Park Royal area where there are about 2,000 companies providing a wide range of goods and services to Central London and the surrounding area. This is right on the OPDC's doorstep, and should be recognised and supported in the Local Plan with more than a few general mentions in the text. The project has been developed through the Mayor's London Waterways Commission Freight Group, in association with UCL University College London, the Commercial Boat Operators Association and the Just Space Network. It may not be long before the new fleet of electric barges will be operating around West London, and the service will then be extended throughout London's 100 mile canal network, and especially on to the Lee Navigation, London's second river
104	2133	Community Group	Del Brenner	Regents Network	Places	P3	T8	there is a range of uses and benefits that the GU Canal can bring to West London. An obvious one is the removal of waste and recycles rather than using the very large road transport vehicles, as water transport is well suited to bulk loads. In that connection, barges can be used effectively, and with 80% less air pollution, for the removal of building and demolition waste which will be crucial with the development of the OPDC area and the construction of HS2 including the huge tonnage of excavation waste from the tunnelling work. Just consider how many hundreds of huge lorries that will take of the local roads in West London. 7.3 Years of disruption can be considerably reduced if the GU Canal is made full use of during the building and development stages of the OPDC area. There is a huge responsibility by the authorities to ensure the construction period is managed and carried out with every possible means of reducing the disruption.
104	2134	Community Group	Del Brenner	Regents Network	Places	P3	SP7	It is a bit of a worry that OPDC (along with other authorities, departments and administrators) does not fully appreciate that London's canals provide 100 miles of transport highway, and with the gridlock of some roads, especially in location such as Park Royal, any additional mode of transport is most welcome (See the 'Freight Network' Map, below).. The conveyance of goods and passengers these days may be different from the historical fare of the past few hundred years, but the principal is just the same. The practicality and usefulness of canal transport should be recognised, and the importance to London and its economy.
104	2135	Community Group	Del Brenner	Regents Network	Places	P3		The future for London's canals including the wonderful stretch through Park Royal and Old Oak is looking sound and optimistic, but where is this dealt with openly in the OPDC Local Plan? There is part of a single sentence in Para 3.76. Many decisions are going to be made which will affect the GU Canal and its long term future, and the Local Plan should be fully knowledgeable and competent so that the decision can be made on a well informed, factual and expert basis.
104	2136	Community Group	Del Brenner	Regents Network	Places	P3		The Mayor and GLA have not woken up to potential of water freight in London, let alone in the OPDC development area. There seems to be little interest in having a thriving Thames transport industry and the canals are effectively sidelined by the Mayor. Unfortunately this disinterest (or negligence in office) seems to have filtered down through the GLA, and there is not much sign of the OPDC management and Board being enlightened on waterway matters either.
104	2137	Community Group	Del Brenner	Regents Network	Places	P3		The future of the Grand Union Canal at Old Oak and Park Royal seems to rely on the Planning Team to make up for the deficiencies. From Day 1 the Planning Team have engaged closely with the residents and the community in the OPDC area, and have given quite a lot of attention to the GU Canal. However, it is a worry that the details and information that have appeared in the Local Plan do not seem to match up with what looked at one time as understanding and support for the canal. Could this sidelining effect have arisen because of competing interests from above?
104	2138	Community Group	Del Brenner	Regents Network	Places	P3		The Canal and River Trust Limited does not own the canals, and the OPDC Local Plan incorrectly attributes the Canal and River Trust as landowner! In the text of Policy P3 it states that "The Canal and River Trust is a key stakeholder as the landowner of the canal and elements of canalside sites" (Policy P3 Supporting Text, Para GUC.1). A text correction is needed. The nations' network of canals, including the Grand Union Canal, is in public ownership. Our canals are held by Government under the 2012 Waterways Infrastructure Trust "in perpetuity for the nation". In other words, the residents and locals in Old Oak are the proud owners of the Grand Union Canal in the OPDC area - along with the rest of the population! The Canal and River Trust Limited is only a management organisation, with great responsibilities of course for maintenance etc, but not ownership of the canals. It is not a charity as such (like Oxfam and the like), it is a management organisation with charitable status. This is a common attribute that many organisations acquire (such as colleges and hospitals, for instance) which enable them to raise funds and have tax benefits.
104	2139	Community Group	Del Brenner	Regents Network	Places	P3		The Local Plan also has a number of mentions of locations for yet more new moorings for residential boats 'in agreement' with Canal and River Trust Limited, and it is quite likely that the OPDC may have been misled by CRT Ltd that this is what is wanted. They are mistaken. The mooring set up in London has become a fiasco and there are many times the reasonable total of moored boats because of the lack of control and management by CRT Ltd. They cynically are happy to see more boats clogging up the canals as they can take fees from them even if this creates a situation that has a serious negative effect on the canals. It is acceptable that there are boaters who wish to float their home on the canals, and they can be part of the canal community. However, the canals are not a housing estate and there has to be a limit to the number of moored boats that can be accommodated. Also many of the residents are tenants rather than boaters, which is an important distinction to recognise. An OPDC canal visit is recommended to inner city locations such as City Road Basin or Victoria Park where there are continuous lines of moored boats, some two or three abreast. This would enable decisions on moorings to be made with better knowledge and experience. [Note: It is also recommended that OPDC pay s regular towpath visits to the GU Canal in Old Oak, to get acquainted with the character and attributes of the canal from first hand].

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104	2140	Community Group	Del Brenner	Regents Network	Places	P3	H1	Living on the canals and being a boater is a way of life that is a choice, rather than a necessity. It is not a cheap any more although it may be more affordable than some other options, and it provides a vey small and 'compact' living space and often minimal services. Canal moorings are often characterised as being a solution to the housing problem, but the numbers of residential boats compared with the tens of thousands of houses needed is insignificant, so it does not provide the answer. Also, the open space value of the waterways has to taken into consideration with its wider benefits to health and well being to the community, and no one would seriously consider using our parks and open land for housing. Why does OPDC not provide adequate low cost and social housing in the development area?
104	2141	Community Group	Del Brenner	Regents Network	Places	P3		The enlightened exception to the repeated mention in the Local Plan to unwelcome moorings is the five mentions by OPDC of visitor moorings (Pages 71, 76,78, 113 & 130) in the Local Plan which could have a very different effect from the 'residential' boats that clog up the waterways. Everyone would like to see more visiting boats, and the visitors should be welcomed and properly catered for. Over the last few years not many boaters from up country have decided to visit London, and for good reason. This situation can be controlled by way of Condition through the planning system so there are Visitor Moorings but not an increase in residential moorings in the Old Oak area. Unfortunately it does not solve the 'London Problem' which has to rely on CRT Ltd to put things right within a reasonable number of years. This seems unlikely to happen in the near future.
104	2142	Community Group	Del Brenner	Regents Network	Places	P3		Along with the visitor moorings, West London is in need of a narrowboat hire centre so that locals can also enjoy holidays or weekends travelling on the GU canal to Uxbridge for instance, and beyond. It would require a canalside boatyard facility somewhere nearby, with a terminus in the central area where the boats could be moored and ready for starting on the trips. The terminus could also provide a boarding point for day trips, and of course pleasant and comfortable journeys into town by waterbus to Paddington or Camden Town. Opportunities such as this will bring the Grand Union Canal back to life and provide something useful and active which would be a welcome contrast to the Canal and River Trust Limited unreasonable notion of a static waterway full of moored boats. The days of the 'Paddington Packet' may return.Provision for boat tips and a water terminus can be provided for by way of Condition through the planning system as the canalside developers would have to be rethink their plans in order to accommodate the waterway facilities. It should not be too much of an imposition on the developers who after all will be benefitting greatly from the presence of a wonderful waterway in their midst. Inlets are required along the north bank of the canal in a number of locations for boats to turn around in what are called 'winding holes', as narrow boats are also long. Provision has to be made for a small basin of about 4m long (13ft) and 1.5m wide for the boats to nose in to whilst they swing round to face the opposite direction.
104	2144	Community Group	Del Brenner	Regents Network	Places	P3		The OPDC management and developers should be grateful for having a considerable section of the 200 year old man-made national network in their patch, which is remarkably in working order and in daily use. However, a considerable responsibility comes with the management and care of a stretch of a national asset. It is not just a local feature. A response is required from OPDC to their duty to give proper respect and attention to their national responsibilities to the GU Canal. Developers are planning all sorts of things in their favour and financial gain that may have an effect on a national asset. It is down to the authorities in their public duty to regulate and guide any potential effect on the national canal network, and it does not seem in the Old Oak and Park Royal development that OPDC is carrying out this responsibility.
104	2147	Community Group	Del Brenner	Regents Network	Places	P10C4		The Mary Seacole Garden off Scrubs Lane is a well known but neglected memorial to a very famous and highly admired Jamaican nurse and heroine from the Crimean War 1854, who is buried (1881) in St Marys Catholic Cemetery, Kensal Green, near by. It is disrespectful that the memorial garden is minimal and squeezed into a small plot beside a dusty Mitre Yard waste station although this is mitigated by the canalside location. Plans are being made for development on the waste station. It is important to ensure than the memorial garden is enlarged and enhanced to a respectful extent which would be an enormous improvement, and only a relatively small impediment to the developer. The extended garden can be secured by way of Condition through the planning system. It is important that OPDC does the right thing particularly when the Local Plan advocates the removal of a strip of the memorial garden location for a cycle access! This requires a reliable assurance from OPDC to ensure the cycle track does not encroach on Mary Seacole's treasured memorial. This will undoubtedly be backed up strongly by the wide community.
104	2148	Community Group	Del Brenner	Regents Network	Places	P10		Not only will the proposed cycle access encroach on Mary Seacole's Memorial Garden, but, without drawing attention to it, the OPDC planners have slipped in a cycle bridge over the canal at Mitre Bridge, shown by the blue arrow and hidden by the bridge label. This furtive planning proposal is not acceptable, and it is reprehensible that little mention of it is made in the text. As the proposal is not in the open, then it cannot be consulted on in a fair and straightforward way. The bridge must be deleted from the Local Plan. The Figure 4.49 (Page 130) must be redrawn, and the cycle route can be directed over the road bridge and be a shared route rather than the proposed but probably impracticable 'segregated route'.
104	2149	Community Group	Del Brenner	Regents Network	Places	P3		An opportunity is there to provide a clear cycle route to the north of the canal, for the full length of canal within the OPDC boundary, rather than a token stretch at the eastern end. The OPDC planners and Board have failed to come up with a coherent and functional cycling network in the area, and especially with an east-west through route. 25.2 The cycle track may have to divert away from the canal at some points, but as so much of the area is to be developed, then provision for the cycle route should not be difficult to provide. There are also convenient stretches of roads (Hythe Road, Waxlow Road, and others) that could be included, and there is even an unused pathway on the north side of the canal aqueduct crossing the North Circular. 25.2 This north towpath cycle route has been suggested a number of times, but as yet OPDC has sidestepped the requests and suggestions, and have taken the easy way out at the expense of pedestrians, walkers, family groups, the elderly and babies in prams who are at risk from cyclists on the narrow towpath.

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104	2150	Community Group	Del Brenner	Regents Network	Places	P3	T3	It has never occurred to the authorities to suggest a reason why the towpaths such as in the OPDC area are not used regularly by pedestrians. The answer is because of the problem of cyclists. It is the pedestrians who find alternative routes and avoid towpaths altogether. Disgraceful. Unfortunately cycling on towpaths is promoted strongly by the Canal and River Trust Limited who do not openly and consistently manage and regulate the cycling problem, because a 'problem' it certainly is – throughout the country. In many respects the management of the canals by CRT Ltd is very weak and patchy, so problems like cycling are not resolved. It is also noted that they seem to make large profits on maintenance projects to improve the cycling surface of towpaths. The feeble suggestion of providing a cycle 'quietway' on the towpath is a nonsense. How many cyclists would ever travel at near walking speed, or stop for a pedestrian even when not racing along? There is insufficient width for a shared path, even if CRT Ltd commit the sin of removing all the greenery and undergrowth as they have done on other stretches of the canals. In Policy T3 'Cycling' there is a photo of the so-called Bow Riverside Cycle Trail (Figure 7.8) which was constructed to take the towpath under the huge Bow Interchange (A12 Blackwall Tunnel Approach and A11). It was never intended to be an exclusive 'cycle trail' but has turned out to be a no-go route for pedestrians and families. It looks like a stark cycle highway in the photo. It should be noted that many cyclists who race along the towpath at present in Old Oak and Park Royal are not local residents, but cyclists from inner areas and the outskirts of London. The towpath is not considered as much assistance to local cyclists. No comprehensive survey has been carried out to analyse the cyclist's routines and needs. Why not? It should be noted that at a recent GUA meeting (13th June 2017) the cycling representatives clearly stated that they did not want a shared route along the canal towpath.
104	2152	Community Group	Del Brenner	Regents Network	Places	P3	T3	Mention of the the so-called 'Quietway' on the towpath should be removed, and there are a number of references to towpath cycling throughout the Local Plan that need deleting: Page 35, Para 3.78 "the towpath providing convenient access for pedestrians and cyclists" Page 52, Figure 4.3 "Walking and cycle routes" Label "Grand Union Canal tow path / cycle route" Page 63, Label "Grand Union Canal tow path / cycle route" Page 71, Key "Pedestrian / cycling routes" Page 75, Vision V2 "High quality walking and cycling routes will integrate comfortably" Key "Walking and cycling routes" Label "Grand Union Canal tow path / cycle route" Page 77, GUC.3 "The Canal performs many valuable functions . . . walking and cycle route" Page 80, Key "Walking and cycling routes" Label "Grand Union Canal tow path / cycle route" Page 112, Key "Pedestrian / cycling routes" Page 113, Para f) "improvements to the towpath as a shared walking and cycling route" Page 117, Para ii) "delivering improved walking and cycling routes . . . along the canal" Page 119, Key "Walking and cycling routes" Label "Grand Union Canal / cycle route" Page 130, Para b, i) "improvements of walking and cycling . . . to the southern towpath" Key "Pedestrian / cycle routes" The above is only a selection of the unwelcome references to cycling being promoted on the canal towpath, and it is of great concern that OPDC seems to be pressing very hard in an attempt to establish a most undesirable cycle route on to the towpath – perhaps in order to avoid making proper provision for cyclists through the area.
104	2154	Community Group	Del Brenner	Regents Network	Places	P3	T3	It also refers to using the towpath as a shared pedestrian and cycle path which is totally unworkable and not wanted. Worst of all it recommends the removal of canalside vegetation, and shows a bleak drawing of a bleak towpath (Page 27) with a painted backdrop of greenery along the back of the towpath! Ugh!
104	2156	Community Group	Del Brenner	Regents Network	Places	P1	Figure 4.4	Figure 4.4: Kings Cross - precedent for a major regeneration scheme A ropy example to feature, with its second rate planning 'structure' and poor architecture at Kings Cross
104	2157	Community Group	Del Brenner	Regents Network	Places	P1	Figure 4.5	Figure 4.5: More London - precedent for employment areas: Very bulky and overdeveloped with scant and narrow thoroughfares
104	2158	Community Group	Del Brenner	Regents Network	Places	P1	Figure 4.6	Figure 4.6: Bankside - precedent for new employment area and town centre uses A very ugly and unimaginative block
104	2159	Community Group	Del Brenner	Regents Network	Places	P1	Figure 4.7	Figure 4.7: St. Andrews, Bow - precedent for high density mixed use development Very dull with dreadful and aggressive balconies
104	2160	Community Group	Del Brenner	Regents Network	Places	P1C1	Figure 4.9	Figure 4.9: Rotterdam Central Station - precedent for station entrance design Just plain odd, and ugly
104	2161	Community Group	Del Brenner	Regents Network	Places	P1C1	Figure 4.10	Figure 4.10: St. Pancras Station - precedent for integrating town centre uses and walking and cycling routes A brilliant and inspiring building, but little to do with town centres and cycling
104	2162	Community Group	Del Brenner	Regents Network	Places	P1C1	Figure 4.11	Figure 4.11: Lierge-Guillemains Station - precedent for station design Not a patch on St Pancras, and too much architect ego
104	2163	Community Group	Del Brenner	Regents Network	Places	P2	Figure 4.13	Figure 4.13: Elephant Park - precedent for a major residential-led mixed use regeneration scheme Just what residents and West London locals fear
104	2164	Community Group	Del Brenner	Regents Network	Places	P2	Figure 4.14	Figure 4.14: City Island - precedent for a high density residential development and green links Uninspiring and plain dull

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104	2165	Community Group	Del Brenner	Regents Network	Places	P2	Figure 4.15	Figure 4.15: Barking Town Centre - precedent for a mixed use town centre development Very ordinary, and again ruined by the dreadful balconies
104	2166	Community Group	Del Brenner	Regents Network	Places	P2	Figure 4.16	Figure 4.16: Handyside Park, Kings Cross - precedent for small open space The Kings Cross open spaces are minimal and inconsequential
104	2167	Community Group	Del Brenner	Regents Network	Places	P2C1	Figure 4.19	Figure 4.19: Granary Square, Kings Cross - precedent for canalside spaces within Grand Union Square Typical setting that takes from the canal, but gives nothing back; a disgrace
104	2168	Community Group	Del Brenner	Regents Network	Places	P2C1	Figure 4.20	Figure 4.20: The Grand Canal Square, Dublin - precedent for canalside spaces within Grand Union Square A useless dead space. Water is attractive, but it must have a life and purpose
104	2169	Community Group	Del Brenner	Regents Network	Places	P3	figure 4.22	Figure 4.22: Hare East, Queen Elizabeth Olympic Park - precedent for the Grand Union Canal Local Park Excellent. The only example used that is satisfactory and worth following
104	2170	Community Group	Del Brenner	Regents Network	Places	P3	figure 4.23	Figure 4.23: Chicago Riverwalk - precedent for activating canalside spaces Canalsides do not need to be activated or animated, it is the water that needs to be alive
104	2171	Community Group	Del Brenner	Regents Network	Places	P4	figure 4.25	Figure 4.25: Hydroponic farms - precedent for urban food growing Potentially a good idea
104	2172	Community Group	Del Brenner	Regents Network	Places	P7	figure 4.33	Figure 4.33: Kings Cross - precedent for coordinated public realm and open spaces The Kings Cross public realm and open space is not well planned, nor generous
104	2173	Community Group	Del Brenner	Regents Network	Places	P7	figure 4.34	Figure 4.34: Dalston Eastern Curve Garde - precedent for meanwhile open space along Elizabeth Line Spur Nondescript, and a better photo needed
104	2174	Community Group	Del Brenner	Regents Network	Places	P10	Figure 4.44	Figure 4.44: Pillbox, Bethnal Green - precedent for small business space Not very descriptive, but potentially a good idea
104	2175	Community Group	Del Brenner	Regents Network	Places	P10C2	Figure 4.47	Figure 4.47: Kings Cross - precedent for linear green space All the parks and green spaces in Kings Cross are linear as there is little space that is 'open'
104	2184	Community Group	Del Brenner	Regents Network	Places	P3	Figure 4.22	The only photo in the Local Plan that is welcome is Figure 4.22 Hare East, Queen Elizabeth Olympic Park – an example of open space for the canal, which without being labelled as a precedent illustrates a nice example of a development that respects the canal. It is interesting that there seems to be a shortage of suitable examples to photo from around London. That says a lot.
105	2188	Agent	Caroline McDade	Deloitte (on behalf of Mapletree Pte)	Places	P4C1		Since 2016, Diageo has contined to review its staffing numbers at Lakeside Drive. Whilst Mapletree recognises the need for office uses to complement existing industrial uses, Lakeside Drive is not necessarily the best location. This is borne out by the difficulty the adjoining landowners of FC200 building have experienced in letting the building since it was speculatively built in 2007. The buildings are standalone with no immediate reference to other offices locally. The First Central area lacks social infrastructure, which is not helpful in attracting office workers. Relatively poor accesss to the site by public transport is also nother reason why the offices may be difficult to let. Mapletree is keen to ensure their site is protected in far as , if the office building is no longer attractive to the market, other suitable uses are considered in the Local Plan allocation which would be in keeping with its proximity to the existing residential area at First Central, and the residential character of the surrounding area. This requires the wording of P4C1 to be as flexible as possible, reflecting the findings of the Future Employment Growth Sectors Study (2017), which recommends that the supply of employment space across the Park Royal area remains diverse and flexible. It is suggested that the wording which identifies job creation also includes wording which allows for evidence of marketing to direct the preferred uses of the site.
105	2189	Agent	Caroline McDade	Deloitte (on behalf of Mapletree Pte)	Places	P4C1	Figure 4.26	In relation to figure 4.26: Brewery Cluster, Mapletree considers the plan to be too prescriptive in identifying positive and active frontages on the plan when there may be changes over the plan period. However, the reference to existing neighbourhoods as reference to the office buildings is welcomed and supported
105	2190	Agent	Caroline McDade	Deloitte (on behalf of Mapletree Pte)	Places	P4C1		Mapletree supports the reference to taller buildings around the two junctions of Coronation Road and Lakeside Drive as the entry points to the First Central area and closest to the A40 and stations.
106	2191	Local Resident	Catherine Sookha		Places	P8		1.1 Wells House Road Residents Association, an association of residents, that represents the interests of some 400+ Wells House Road residents and landlords directly affected by construction and development from the OPDC Local Plan proposals as well as the HS2 Old Oak Common interchange construction. 1.2 Wells House Road is a triangular cul-de-sac of around 125 Edwardian homes of which 45 are occupied by people who have lived in the street for 25-70 years. At least ten homes are occupied by the children of the original residents and many are caring for elderly parents in these homes. It is a culturally diverse and integrated street. In short, this is a traditional family community that has a strong desire to retain its integrity as such. It should also be noted that many people chose to move to Wells House Road as it is an oasis of peace and quiet, close to West London areas such as Notting Hill, Shepherds Bush and Kensal Rise and with excellent transport connections in Zone 2. There are around 25 children under the age of 18 living in Wells House Road who can be seen and heard playing safely in the street. 1.3 Wells House Road also has exceptional views across London to the London Eye and the Shard. 1.4 It should be noted that Wells House Residents will be at the centre of HS2 and OPDC development for 10-30 years.
106	2197	Local Resident	Catherine Sookha		Places	P8		In order to 'soften the blow', there is a need for a 'buffer zone' of around 100 meters between the existing communities and new developments that will be higher than existing buildings. We require justification of the unreasonable plot ratios and the 'soft area', which has not been included in Reg. 19 despite our repeated requests throughout the consultation. At all costs, OPDC developments should avoid overshadowing, the intensification of pressure on transport, and should revert to the previous agreement in Reg. 18 on sensitive edges. Ideally, OPDC should provide formal limits to the proximity of new developments around sensitive existing communities and move to a policy of green space around new developments.
106	2198	Local Resident	Catherine Sookha		Places	P1		This would include the adherence to the proposed green space between Wells House Road and the HS2 station, as illustrated in promised by Peter Fry of HS2 and other HS2 staff during their consultations. We require justification as to why this minor request is being ignored.

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
106	2202	Local Resident	Catherine Sookha		Places	P8		We ask that the OPDC acts humanely and works with HS2 to provide ACOUSTIC GLAZING and AIR CONDITIONING for ALL HOUSES in Wells House Road, back & front. See Appendix 1: Air quality.
106	2213	Local Resident	Catherine Sookha		Places	P5 P4		There is a need for justification of why Park Royal can't have some mixed use, e.g. add an extra floor or two to some of the warehouses to include residential or live/work spaces – and underpinning the idea of making the area a contemporary and vibrant neighbourhood for Londoners. OPDC needs to take a more 21st century approach and aim to develop the area into a vibrant community like East London, in order to meet needs of Londoners. This area already includes artists' studios and prop houses, and it could potentially become another Shoreditch where a change to mixed-use is achieved without impacting on existing businesses. This would encourage vibrant cafes and shops to pop up, which would be used by existing workers in the area. This is supported by the impossibility of significantly intensifying land use of Park Royal according to the Industrial Land Study.
106	2214	Local Resident	Catherine Sookha		Places	P8		We ask for 'sweeteners' for Wells House Residents to see us through the next decades of noise, pollution and disruption. This should include the rebuilding of our retaining wall as a green wall, which will help the entire community deal with noise and pollution. We also ask OPDC to work with Wells House Road residents to discuss other ideas for softening the blows to our already blighted community.
106	2219	Local Resident	Catherine Sookha		Places			There are significant concentrations of poor air quality in terms of NOx exceedances at areas of early and high density planned developments along Scrubs Lane, with an Air Quality Focus Area at the intersection with Harrow Road and Harlesden Town Centre; and another challenging area expected at the Victoria Road/Old Oak Lane area, consequent upon HS2 works. Table 5.1 of the AQS proposes several focus areas for air quality control. Specific monitoring, abatement and mitigation measures should be specifically brought forward into each Place policy.
106	2220	Local Resident	Catherine Sookha		Places	P7		Specific impacts of HS2 are recognised in the Air Quality Study (P28) This is an issue in the "North Acton Place" Policy and the following paragraph (NA.14) could be strengthened (also, developments should not be permitted where air quality exceedances) and brought into the policy box:
106	2221	Local Resident	Catherine Sookha		Places	P4	c)	This form of words from the Park Royal Places policies could be strengthened, brought into the policy box as opposed to supporting text and used more generally: "Policy P4C (1m) Policy P4 (l): Contributing to and/or delivering measures that help support OPDC, the host authorities, and where relevant TfL, to improve air quality monitoring, and overcome issues identified in Local Air Quality Focus Areas around the A40 and A406." To note: PRW9 – encourages a modal shift in Park Royal to address pollution issues]
107	2237	Residents Association	Mark Walker	TITRA	Places	P1	iii	Policy P1l(iii) for Old Oak South which refers to delivering heights of generally 6-8 storeys fronting directly onto the Grand Union Canal with opportunities for taller buildings at key crossing points such as Old Oak High Street, Park Road and Union Street, but this is very much the exception. The plan should make it much clearer where it wants tall buildings – such as at the centre of Old Oak North - and make it unequivocal that sensitive sites like residential enclaves like the railway cottages, Midland Terrace and Wells House Road (adjacent to the Old Oak South/HS2 Old Oak Common Station and its associated development) are not overshadowed by development that are out of scale OR more than six storeys in height throughout and not simply the elevation facing older residential areas.
107	2239	Residents Association	Mark Walker	TITRA	Places	Site Allocations		Page 50 of this plan has a table of 28 individual Site Allocations but doesn't clarify the sites' or the housing densities: this doesn't comply with National Planning Policy Guidance (as stated above) which says these details must be made clear to local communities.
107	2245	Residents Association	Mark Walker	TITRA	Places			TITRA believes that the Chapter 4 on Places is too prescriptive on details of planned local 'Places' to accommodate changes in the economy and workplaces. Could there be an alternative such as smaller-scale Area Action Plans and neighbourhood plans instead, or at the least regular reviews of this Plan every couple of years.
107	2246	Residents Association	Mark Walker	TITRA	Places	P1		TITRA has found inconsistencies in Policy P1 l) on Building Heights: Sub-paragraph (iii) calls for a building height "range of 6 to 8 storeys fronting directly onto Grand Union Canal" but no similar figures are provided in relation to "the delivery of the tallest buildings around Old Oak Common Station" - sub-paragraph (i) - or "the range of building heights including tall buildings at points of the greatest activity across Old Oak South" - in its sub-paragraph (ii). This policy should be clarified, so that it takes much greater account of sensitive locations nearby such as Wells House Road.
107	2247	Residents Association	Mark Walker	TITRA	Places	P2	l)	TITRA supports in broad terms Policy P2l that aims to "support health and well-being by ensuring sensitive uses are located away from pollution sources" and "new development mitigates the impacts of noise and air pollution generated by rail transport and the surrounding uses including Old Oak Sidings waste facility and access road" but the association requests that this policy goes much further. Since it opened in 2005 - not just in the timeframe that led to its record UK pollution fine - Powerday has been unable to comply with UK pollution legislation. As a result, its waste operations must be moved to other sites in Park Royal or scaled back and more emphasis put on local waste being managed at source in Park Royal / construction sites.
107	2249	Residents Association	Mark Walker	TITRA	Places	P2 E1		TITRA supports Policy P2d(v) assisting the ArtWest artist and makers' studios and workshops in Hythe Road and Scrubs Lane; it would like to see much more emphasis in Policy E1 on cheap and affordable workspaces, delivered by planning conditions and S106 agreements
107	2250	Residents Association	Mark Walker	TITRA	Places	P3		TITRA welcomes the plan's use of the canal as a key feature in the redevelopment. However, TITRA requires Policy P3 to see have more clarity over and future environmental controls as contractors begin to use the canal for moving construction and other waste material – from wharves such as Powerday - during the decades of construction
107	2251	Residents Association	Mark Walker	TITRA	Places	P3		TITRA thinks that Policy P3h needs to provide more detail on how the southern towpath will be improved to create the walking and cycling route. Our residents question how a two-way cycling route can be delivered when space is so limited. TITRA members are also concerned by the aggression shown by cyclists towards pedestrians; we have petitioned the OPDC and Ealing Council on this issue.
107	2252	Residents Association	Mark Walker	TITRA	Places	P7	b.ii	TITRA notes that Policy P7b)ii) earmarks this 'Place' for "appropriate levels of student accommodation" in accordance with Policy H10 while policy H10 a)iv) supports student housing where this does not result in over-concentration. TITRA questions these policies: the North Acton gyratory area already has very-concentrated student accommodation towers, unappealing public realm and so far, limited ground-floor retail and entertainment offerings. Aside of Tesco and Sainsbury's, it's not a valuable addition to our community.

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
107	2253	Residents Association	Mark Walker	TITRA	Places	P7		TITRA objects to P7's current early-stage proposal from TfL for a 9-metre-wide cycle/pedestrian bridge from the Old Oak Common Overground Station connecting the HS2/Crossrail station and North Acton Station when initial proposals were for a tunnel give the sensitivity of the Midland Terrace/Shafesbury Gardens locations.
107	2254	Residents Association	Mark Walker	TITRA	Places	P8		TITRA supports Policy P8 vision for a 'Place' which requires 'sensitive integration' between existing and new development. As this 'Place' is near both the proposed Old Oak Common Station and the tallest buildings suggested for Old Oak South's central area, TITRA thinks there should be a 'buffer zone' between this planned location and Wells House Road and Midland Terrace. .
107	2255	Residents Association	Mark Walker	TITRA	Places	P9		Most of this 'Place' is needed by HS2 for construction and waste transfer activity and other requirements as in Policy P9a. TITRA questions the general designation of parts of the area as SIL as being inflexible to changing economic needs, adversely affecting would safeguard the quality of life in the railway cottages residential enclave. This policy could also conflict with P9 sub-policies on Public Realm and Movement (P9g) and Green Infrastructure (Policy P9 h).
107	2256	Residents Association	Mark Walker	TITRA	Places	P9		TITRA welcomes the eastern part of this Channel Gate 'Place' being designated Old Oak Neighbourhood Area which gives better scope in the future for development that balances industrial, mixed uses and residential communities' needs.
107	2257	Residents Association	Mark Walker	TITRA	Places	P9	g)	TITRA supports Policy P9g seeking strengthening access points into Channel Gate from Atlas Road. In the long-term, our association wants to see Channel Gate Road itself closed altogether, given its polluting nature and its associated anti-social behaviours, once HS2 no longer has requirements for this land.
107	2268	Residents Association	Mark Walker	TITRA	Places	P1		TITRA agrees that Policy P12a that any proposals need to be agreed with the Wormwood Scrubs Charitable Trust and Hammersmith & Fulham council. TITRA believes that detailed plans for the future of the Scrubs would have benefited greatly from being addressed via a neighbourhood plan that can harness local insights into such as area's uses. Following the OPDC's removal of the Scrubs area from the proposed Old Oak Neighbourhood Area, effective consultation with the Friends of Wormwood Scrubs group will become essential.
109	2280	Local Resident	Lynette Hollender		Places	P8		1.1 Wells House Road Residents Association, an association of residents, that represents the interests of some 400+ Wells House Road residents and landlords directly affected by construction and development from the OPDC Local Plan proposals as well as the HS2 Old Oak Common interchange construction. 1.2 Wells House Road is a triangular cul-de-sac of around 125 Edwardian homes of which 45 are occupied by people who have lived in the street for 25-70 years. At least ten homes are occupied by the children of the original residents and many are caring for elderly parents in these homes. It is a culturally diverse and integrated street. In short, this is a traditional family community that has a strong desire to retain its integrity as such. It should also be noted that many people chose to move to Wells House Road as it is an oasis of peace and quiet, close to West London areas such as Notting Hill, Shepherds Bush and Kensal Rise and with excellent transport connections in Zone 2. There are around 25 children under the age of 18 living in Wells House Road who can be seen and heard playing safely in the street. 1.3 Wells House Road also has exceptional views across London to the London Eye and the Shard. 1.4 It should be noted that Wells House Residents will be at the centre of HS2 and OPDC development for 10-30 years.
109	2286	Local Resident	Lynette Hollender		Places	P8		In order to 'soften the blow', there is a need for a 'buffer zone' of around 100 meters between the existing communities and new developments that will be higher than existing buildings. We require justification of the unreasonable plot ratios and the 'soft area', which has not been included in Reg. 19 despite our repeated requests throughout the consultation. At all costs, OPDC developments should avoid overshadowing, the intensification of pressure on transport, and should revert to the previous agreement in Reg. 18 on sensitive edges. Ideally, OPDC should provide formal limits to the proximity of new developments around sensitive existing communities and move to a policy of green space around new developments.
109	2287	Local Resident	Lynette Hollender		Places	P1		This would include the adherence to the proposed green space between Wells House Road and the HS2 station, as illustrated in promised by Peter Fry of HS2 and other HS2 staff during their consultations. We require justification as to why this minor request is being ignored.
109	2291	Local Resident	Lynette Hollender		Places	P8		We ask that the OPDC acts humanely and works with HS2 to provide ACOUSTIC GLAZING and AIR CONDITIONING for ALL HOUSES in Wells House Road, back & front. See Appendix 1: Air quality.
109	2302	Local Resident	Lynette Hollender		Places	P5 P4		There is a need for justification of why Park Royal can't have some mixed use, e.g. add an extra floor or two to some of the warehouses to include residential or live/work spaces – and underpinning the idea of making the area a contemporary and vibrant neighbourhood for Londoners. OPDC needs to take a more 21st century approach and aim to develop the area into a vibrant community like East London, in order to meet needs of Londoners. This area already includes artists' studios and prop houses, and it could potentially become another Shoreditch where a change to mixed-use is achieved without impacting on existing businesses. This would encourage vibrant cafes and shops to pop up, which would be used by existing workers in the area. This is supported by the impossibility of significantly intensifying land use of Park Royal according to the Industrial Land Study.
109	2303	Local Resident	Lynette Hollender		Places	P8		We ask for 'sweeteners' for Wells House Residents to see us through the next decades of noise, pollution and disruption. This should include the rebuilding of our retaining wall as a green wall, which will help the entire community deal with noise and pollution. We also ask OPDC to work with Wells House Road residents to discuss other ideas for softening the blows to our already blighted community.
110	2414	Community Group	Sharon Hayward	Grand Union Alliance	Places	All places		However, remedying this should not only occur within this Policy but also in the Places Policies: Strengthening place based air quality policies: The Local Plan acknowledges that: Parts of Old Oak and Park Royal suffer from high levels of air and noise pollution, arising from heavy industrial uses and the primary transport corridors running through and adjacent the area. (p. 304). Specific monitoring, abatement and mitigation measures should be specifically brought forward into each Place Policy. For example, this is an issue with North Acton and Acton Wells Policy P7 clause (l) which should be strengthened (also, developments should not be permitted where there are air quality exceedances) by bringing into the policy box text para NA.14: To support health and well-being of local people, new development will need to contribute to improving air quality along the A40, Wales Farm Road and Victoria Road through identified measures and in discussions with OPDC. This may include street- greening, shaping the form of development and using specific high quality sustainable materials. Again this form of words, appropriately modified to relate to A40 and A406, could be applied to strengthen the Park Royal West Brewery Cluster Policy P4C1(m).

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
111	2656	Local Resident	Jeremy Aspinall		Places	P8		1.1 Wells House Road Residents Association, an association of residents, that represents the interests of some 400+ Wells House Road residents and landlords directly affected by construction and development from the OPDC Local Plan proposals as well as the HS2 Old Oak Common interchange construction. 1.2 Wells House Road is a triangular cul-de-sac of around 125 Edwardian homes of which 45 are occupied by people who have lived in the street for 25-70 years. At least ten homes are occupied by the children of the original residents and many are caring for elderly parents in these homes. It is a culturally diverse and integrated street. In short, this is a traditional family community that has a strong desire to retain its integrity as such. It should also be noted that many people chose to move to Wells House Road as it is an oasis of peace and quiet, close to West London areas such as Notting Hill, Shepherds Bush and Kensal Rise and with excellent transport connections in Zone 2. There are around 25 children under the age of 18 living in Wells House Road who can be seen and heard playing safely in the street. 1.3 Wells House Road also has exceptional views across London to the London Eye and the Shard. 1.4 It should be noted that Wells House Residents will be at the centre of HS2 and OPDC development for 10-30 years.
111	2662	Local Resident	Jeremy Aspinall		Places	P8		In order to 'soften the blow', there is a need for a 'buffer zone' of around 100 meters between the existing communities and new developments that will be higher than existing buildings. We require justification of the unreasonable plot ratios and the 'soft area', which has not been included in Reg. 19 despite our repeated requests throughout the consultation. At all costs, OPDC developments should avoid overshadowing, the intensification of pressure on transport, and should revert to the previous agreement in Reg. 18 on sensitive edges. Ideally, OPDC should provide formal limits to the proximity of new developments around sensitive existing communities and move to a policy of green space around new developments.
111	2663	Local Resident	Jeremy Aspinall		Places	P1		This would include the adherence to the proposed green space between Wells House Road and the HS2 station, as illustrated in promised by Peter Fry of HS2 and other HS2 staff during their consultations. We require justification as to why this minor request is being ignored.
111	2667	Local Resident	Jeremy Aspinall		Places	P8		We ask that the OPDC acts humanely and works with HS2 to provide ACOUSTIC GLAZING and AIR CONDITIONING for ALL HOUSES in Wells House Road, back & front. See Appendix 1: Air quality.
111	2678	Local Resident	Jeremy Aspinall		Places	P5 P4		There is a need for justification of why Park Royal can't have some mixed use, e.g. add an extra floor or two to some of the warehouses to include residential or live/work spaces – and underpinning the idea of making the area a contemporary and vibrant neighbourhood for Londoners. OPDC needs to take a more 21st century approach and aim to develop the area into a vibrant community like East London, in order to meet needs of Londoners. This area already includes artists' studios and prop houses, and it could potentially become another Shoreditch where a change to mixed-use is achieved without impacting on existing businesses. This would encourage vibrant cafes and shops to pop up, which would be used by existing workers in the area. This is supported by the impossibility of significantly intensifying land use of Park Royal according to the Industrial Land Study.
111	2679	Local Resident	Jeremy Aspinall		Places	P8		We ask for 'sweeteners' for Wells House Residents to see us through the next decades of noise, pollution and disruption. This should include the rebuilding of our retaining wall as a green wall, which will help the entire community deal with noise and pollution. We also ask OPDC to work with Wells House Road residents to discuss other ideas for softening the blows to our already blighted community.
113	2686	Local Resident	Thomas Dyton		Places	P8		1.1 Wells House Road Residents Association, an association of residents, that represents the interests of some 400+ Wells House Road residents and landlords directly affected by construction and development from the OPDC Local Plan proposals as well as the HS2 Old Oak Common interchange construction. 1.2 Wells House Road is a triangular cul-de-sac of around 125 Edwardian homes of which 45 are occupied by people who have lived in the street for 25-70 years. At least ten homes are occupied by the children of the original residents and many are caring for elderly parents in these homes. It is a culturally diverse and integrated street. In short, this is a traditional family community that has a strong desire to retain its integrity as such. It should also be noted that many people chose to move to Wells House Road as it is an oasis of peace and quiet, close to West London areas such as Notting Hill, Shepherds Bush and Kensal Rise and with excellent transport connections in Zone 2. There are around 25 children under the age of 18 living in Wells House Road who can be seen and heard playing safely in the street. 1.3 Wells House Road also has exceptional views across London to the London Eye and the Shard. 1.4 It should be noted that Wells House Residents will be at the centre of HS2 and OPDC development for 10-30 years.
113	2692	Local Resident	Thomas Dyton		Places	P8		In order to 'soften the blow', there is a need for a 'buffer zone' of around 100 meters between the existing communities and new developments that will be higher than existing buildings. We require justification of the unreasonable plot ratios and the 'soft area', which has not been included in Reg. 19 despite our repeated requests throughout the consultation. At all costs, OPDC developments should avoid overshadowing, the intensification of pressure on transport, and should revert to the previous agreement in Reg. 18 on sensitive edges. Ideally, OPDC should provide formal limits to the proximity of new developments around sensitive existing communities and move to a policy of green space around new developments.
113	2693	Local Resident	Thomas Dyton		Places	P1		This would include the adherence to the proposed green space between Wells House Road and the HS2 station, as illustrated in promised by Peter Fry of HS2 and other HS2 staff during their consultations. We require justification as to why this minor request is being ignored.
113	2697	Local Resident	Thomas Dyton		Places	P8		We ask that the OPDC acts humanely and works with HS2 to provide ACOUSTIC GLAZING and AIR CONDITIONING for ALL HOUSES in Wells House Road, back & front. See Appendix 1: Air quality.
113	2708	Local Resident	Thomas Dyton		Places	P5 P4		There is a need for justification of why Park Royal can't have some mixed use, e.g. add an extra floor or two to some of the warehouses to include residential or live/work spaces – and underpinning the idea of making the area a contemporary and vibrant neighbourhood for Londoners. OPDC needs to take a more 21st century approach and aim to develop the area into a vibrant community like East London, in order to meet needs of Londoners. This area already includes artists' studios and prop houses, and it could potentially become another Shoreditch where a change to mixed-use is achieved without impacting on existing businesses. This would encourage vibrant cafes and shops to pop up, which would be used by existing workers in the area. This is supported by the impossibility of significantly intensifying land use of Park Royal according to the Industrial Land Study.

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
113	2709	Local Resident	Thomas Dyton		Places	P8		We ask for 'sweeteners' for Wells House Residents to see us through the next decades of noise, pollution and disruption. This should include the rebuilding of our retaining wall as a green wall, which will help the entire community deal with noise and pollution. We also ask OPDC to work with Wells House Road residents to discuss other ideas for softening the blows to our already blighted community.
113	2714	Local Resident	Thomas Dyton		Places			There are significant concentrations of poor air quality in terms of NOx exceedances at areas of early and high density planned developments along Scrubs Lane, with an Air Quality Focus Area at the intersection with Harrow Road and Harlesden Town Centre; and another challenging area expected at the Victoria Road/Old Oak Lane area, consequent upon HS2 works. Table 5.1 of the AQS proposes several focus areas for air quality control. Specific monitoring, abatement and mitigation measures should be specifically brought forward into each Place policy.
113	2715	Local Resident	Thomas Dyton		Places	P7		Specific impacts of HS2 are recognised in the Air Quality Study (P28) This is an issue in the "North Acton Place" Policy and the following paragraph (NA.14) could be strengthened (also, developments should not be permitted where air quality exceedances) and brought into the policy box:
113	2716	Local Resident	Thomas Dyton		Places	P4	c)	This form of words from the Park Royal Places policies could be strengthened, brought into the policy box as opposed to supporting text and used more generally: "Policy P4C (1m) Policy P4 (I): Contributing to and/or delivering measures that help support OPDC, the host authorities, and where relevant TfL, to improve air quality monitoring, and overcome issues identified in Local Air Quality Focus Areas around the A40 and A406." To note: PRW9 – encourages a modal shift in Park Royal to address pollution issues]
114	2733	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Places	P1	iii	Policy P1I(iii) for Old Oak South which refers to delivering heights of generally 6-8 storeys fronting directly onto the Grand Union Canal with opportunities for taller buildings at key crossing points such as Old Oak High Street, Park Road and Union Street, but this is very much the exception. The plan should make it much clearer where it wants tall buildings – such as at the centre of Old Oak North - and make it unequivocal that sensitive sites like residential enclaves like Midland Terrace, Wells House Road and TITRA are not overshadowed by development that are out of scale OR more than six storeys in height around the edges of the existing residential communities. The planning process granting planning permission for Genesis scheme started very badly for us, allowing 24 storey building less than 100 metres from the northern edge of Shaftesbury Gardens 3-storey blocks.
114	2735	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Places	Site Allocations		Page 50 of this plan has a table of 28 individual Site Allocations but doesn't clarify the site's size or the housing density: this doesn't comply with National Planning Policy Guidance (Paragraph 010) which says these details have to be made clear to local communities.
114	2741	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Places			We believe that the Chapter 4 on Places is too prescriptive on details of planned local 'Places' to accommodate changes in the economy and workplaces. We think that there should be smaller-scale Area Action Plans and neighbourhood plans instead, or at the least regular reviews of this Plan every couple of years.
114	2742	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Places	P1	l)	We found inconsistencies in Policy P1 I) on Building Heights. Its sub-paragraph (iii) calls for a building height "range of 6 to 8 storeys fronting directly onto Grand Union Canal" but no similar figures are provided in relation to "the delivery of the tallest buildings around Old Oak Common Station" - sub-paragraph (i) - or "the range of building heights including tall buildings at points of the greatest activity across Old Oak South"- in its sub-paragraph (ii). This policy should be clarified, so that it takes much greater account of sensitive locations nearby such Midland Terrace and Wells House Road.
114	2743	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Places	P2 E1		We support Policy P2d(v) assisting the ArtWest artist and makers' studios and workshops in Hythe Road and Scrubs Lane; it would like to see more emphasis in Policy E1 on cheap and affordable workspaces, delivered by planning conditions and S106 agreements.
114	2744	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Places	P3		We welcome the plan's use of the canal as a defining feature of redevelopment. However, Policy 3 should have more clarity over the future environmental controls as contractors begin to use the canal for moving construction and other waste material during the decades of construction.
114	2745	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Places	P3		We think that Policy P3h needs to provide more detail on how the southern towpath will be 'improved' to create an 'east-west walking and cycling route' - part of the National Cycle Network and proposed TfL Quietway'. Our residents question how a two-way cycling route can be delivered when space is limited, especially where the bridges constrict the towpath.
114	2746	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Places	P7	b.ii	TITRA notes that Policy P7b)ii) earmarks this 'Place' for "appropriate levels of student accommodation" in accordance with Policy H10 while policy H10 a)iv) supports student housing where this does not result in overconcentration. We question these policies: the North Acton gyratory already has a heavy concentration of student accommodation, unappealing and windswept public realm and so far, limited ground-floor retail and entertainment offerings.
114	2747	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Places	P7		We strongly object to P7's current early-stage proposal from TfL for a 9-metre-wide cycle/pedestrian bridge from the Old Oak Common Overground Station connecting the HS2/Crossrail station and North Acton Station when initial proposals were for a tunnel, given the sensitivity of the Midland Terrace/Shaftesbury Gardens locations.
114	2748	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Places	P8		We support Policy P8 vision for a 'Place' which requires 'sensitive integration' between existing and new development. As this 'Place' is near both the proposed Old Oak Common Station and the tallest buildings suggested for Old Oak South's central area, we think there should be a 'buffer zone' between this planned location and Wells House Road and Midland Terrace.
114	2749	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Places	P8C1		We think that Policy P8C1 for the proposed Atlas Junction Town Centre Cluster is a very detailed policy for a Local Plan. TITRA wonders if it would be better to examine this as part of the Old Oak Neighbourhood Area that it designated in September 2017 which could harness detailed local insights, including the residents of the Collective as well as older residential areas.
114	2750	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Places	P9		Most of this 'Place' is needed by HS2 for construction and waste transfer activity. compound and other requirements. We question the general designation of parts of this area as SIL as being inflexible to changing economic needs, and in conflict with the quality of life in the railway cottages residential enclave (TITRA). This policy could also conflict with P9 sub-policies on Public Realm and Movement (P9g) and Green Infrastructure (Policy P9h).

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114	2751	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Places	P9	g)	We support the Policy P9g for a street network and strengthening access points into Channel Gate from Atlas Road. In the long-term, our close neighbours TITRA would like to see Channel Gate Road shut down, given its polluting nature and its associated anti-social behaviour, once HS2 no longer has requirements for this land.
114	2761	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Places	P1		We agree that Policy P12a that any proposals need to be agreed with the Wormwood Scrubs Charitable Trust and Hammersmith & Fulham council. We believe that detailed plans for the future of the Scrubs would have benefited greatly from being addressed via a neighbourhood plan that can harness local insights into such as area's uses. Following the OPDC's removal of the Scrubs area from the proposed Old Oak Neighbourhood Area, effective consultation with the Friends of Wormwood Scrubs will become essential
115	2770	Local Resident	Nye Jones		Places	P1	iii	Policy P11(iii) for Old Oak South talks of heights of generally 6-8 storeys fronting directly onto the Grand Union Canal with opportunities for taller buildings at key crossing points such as Old Oak High Street but this is the exception. The plan should say clearly that residential enclaves like the railway cottages, Midland Terrace and Wells House Road, are not overshadowed by development that is out of scale with them OR more than six storeys in height throughout.
115	2772	Local Resident	Nye Jones		Places	Site Allocations		Page 50 of this plan has a table of 28 individual Site Allocations but it doesn't clarify the site's size or the housing density: this doesn't comply with National Planning Policy Guidance (Paragraph 010) which says these details have to be made clear to local communities.
115	2774	Local Resident	Nye Jones		Places	P3		TITRA welcomes Policy P3 use of the canal in Old Oak's redevelopment but wants clarity/future environmental controls if contractors use it for moving construction and other waste material – from wharves such as Powerday.
115	2775	Local Resident	Nye Jones		Places	P3		We think P3 needs to show how the southern towpath will be 'improved' to create an 'east-west walking and cycling route'. We question how a two-way cycling route can be delivered when space is so limited – especially where the bridges constrict the towpath. Conflict over the towpath is a problem, so much so that TITRA members have petitioned the OPDC and Ealing Council over the aggression shown by cyclists towards pedestrians that they have petitioned the OPDC and Ealing Council on this issue.
115	2776	Local Resident	Nye Jones		Places	P7		TITRA objects to P7's current early-stage proposal from TfL for a 9 metre-wide cycle/pedestrian bridge from the Old Oak Common Overground Station connecting the HS2/Crossrail station and North Acton Station. Initial proposals were for a tunnel give the sensitivity of the Midland Terrace/Shafesbury Gardens locations - this should be further explored.
115	2777	Local Resident	Nye Jones		Places	P9		In Policy P9 on Channel Gate, TITRA sees the designation of parts of the area as SIL as being inflexible to changing economic needs, and in conflict with ensuring air quality / no pollution in the railway cottages enclave. This policy could also conflict with P9 sub-policies on Public Realm and Movement (P9g) and Green Infrastructure (Policy P9 h).
115	2778	Local Resident	Nye Jones		Places	P9	g)	TITRA supports Policy P9g seeking strengthening access points into Channel Gate from Atlas Road. In the long-term, our association wants to see Channel Gate Road itself closed altogether, given its polluting nature and its associated anti-social behaviours, once HS2 no longer has requirements for this land.
118	2817	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		Our client's site should be removed from the proposed Strategic Industrial Land (SIL) designation and should be identified as a site allocation for the following reasons: 1. The site benefits from an implemented planning permission for a major mixed use development; As set out within Appendix A, the planning permission is extant (92/0009) and this is confirmed through the grant of a Lawful Development Certificate dated 19 December 2007. The Lawful Development Certificate was the subject of a Public Inquiry which resulted in the grant of the Certificate and an award of costs being made against LBB as a result of their unreasonable behaviour. The implemented planning permission has not yet been built out due to a number of factors which include: – The unreasonableness of LBB who initially refused to accept that the planning permission had been implemented resulting in significant delay to the project and the need to proceed to Inquiry to obtain a Lawful Development Certificate and to address subsequent High Court and Court of Appeal challenge brought by LBB, all of which failed; – The national and international recession which commenced in 2008 which resulted in major developments in London including our client's development being put on hold for a long period of time; – The site is contaminated and requires substantial upfront costs to deliver extensive mitigation; and – The continued designation of the site as SIL in the draft Local Plan which significantly increases risk on the project which in turn is frustrating funding of the project. 2. It is significant that the site is clear and is in the single ownership of Ashia Centur Limited and does not require any further land assembly. Most sites within the OPDC are in multiple ownership and deliverability is complex. 3. The implemented planning permission comprises the following employment led uses which should be reflected in the site allocation: – Small scale Class A1/A3 retail uses; – Class C1 hotel (including ancillary health club and conference facilities); Class D1 cultural / exhibition centre ; – Class D2 leisure uses including cinema; – Sui generis uses including casino, theatre, nightclub and television centre Additional uses that are considered appropriate and complementary to the approved uses should also be included in the site allocation : – Larger scale Class A retail uses (A1-A5); – Class B1a Office; – Class B1b Research and Development; – Class B1c Light industrial
118	2818	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		Whilst it is noted that the Mayor of London is looking to restrict the release of SIL within the forthcoming New London Plan and that this approach is set out within the 'Industrial Land Demand' (June 2017) report prepared by CAG Consultants in association with Colliers, Ramidus Consulting and Peter Brett Associates, however, in the present case the site does not contribute towards the provision of industrial uses within the Opportunity Area – this has been the case for the past 25 years. The site's removal from the Park Royal SIL (Broad Location) does not compromise the integrity or delivery of the remaining SIL land and neither does the extant permission prejudice the successful operation of neighbouring industrial uses within the Park Royal SIL. As is apparent, it in any event will not be delivered for SIL purposes as the development the subject of the permission will be undertaken. The site is located at the western extremity of the Opportunity Area and Park Royal SIL and is not a key integrated site within the SIL. The site is bound to the west by the North Circular Road, Abbey Road to the north and canal to the south and it therefore forms an independent island site that is not linked with the remaining SIL.

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118	2819	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		The site with its extant consent and mix of uses including retail, hotel, cultural, leisure and sui generis uses will act as a buffer / transition zone between the traditional, noisy and dirty industrial activities found to the east / south in the SIL and the mixed use character to the north and west, including substantial areas of residential beyond the North Circular Road. The land uses being implemented by the extant consent, whilst being significant employment generators in their own right, are complimentary to both the industrial uses in the main SIL and the mixed-use character to the north and west.
118	2820	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		The site is considered to be similar in character to the Brewery Cluster as designated within the draft Local Plan as an Opportunity Site (Number 27). It is considered that both sites share a number of similar attributes: The Brewery Cluster is focussed around a key point of entry into the industrial area from Park Royal and Hanger Lane rail stations, whereas our client's site is a key point of entry from the north west from Stonebridge Underground and Overground Stations; Both sites can provide a transition zone between more traditional dirty and noisy industrial uses in the heart of the SIL and more neighbourly employment generating uses at these fringe gateway sites; – Both sites can meet a need for a mix of uses as identified within our client's commercial report (submitted separately in the coming weeks) and as evidenced within the draft Local Plan which notes on page 86 that: "Park Royal as a whole currently suffers from a lack of facilities for businesses and employees, with only one nursery, two gyms, four hotels and no conference facilities. This presents a problem when trying to attract businesses into Park Royal, with some other industrial estates having more facilities available for staff and businesses. Therefore, introducing these uses could help create a more sustainable neighbourhood, with services being closer to where people live and work. However, any town centre uses would need to be small-scale 'walk-to' facilities, to complement the surrounding town centre hierarchy." In the context of points 7 and 8 above, the extant planning permission complements the Alpertown Masterplan to the north east (refer to Figure 2) which has been designated a housing zone by the GLA (July 2015) which will deliver 3,213 new homes within walking distance of the site. The site represents a key gateway site into the Opportunity Area from the west.
118	2821	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		10. The consented development is of a high quality having been designed by Chapman Taylor Architects and commensurate to its gateway location. The planning permission incorporates the British Pavilion designed for the World Expo, Seville (1992) by Sir Norman Foster. 11. The redevelopment of this site will act as a catalyst for further regenerating development within the Opportunity Area. 12. The extant planning permission has the potential to deliver the following: o 2,800 new jobs; o 1,000,000 visitors to the site (hotel); o generate a financial benefit to the Opportunity Area of £15,000,000 per annum (in terms of rates); and o provide 900-1000 jobs during construction.
118	2822	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		13. In total twenty eight sites have been allocated within the current draft Local Plan, all of which do not have planning permission and only one site (First Central, Number 27) has a live planning application before the OPDC for a major residential led mixed use development. 14. In order for the extant permission to make the above contributions it is necessary for the scheme to progress. For this to happen it is necessary for the SIL designation to be removed to enable the project to progress without the risk that the SIL designation creates.
118	2823	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	Site Allocations		Chapter 4 sets out 'place and cluster' policies that are accompanied by a series of larger sites that are likely to come forward for development and contribute to OPDC's homes and jobs targets. These Site Allocations set job capacity targets and minimum homes and employment targets for these sites. The draft Local Plan identifies site allocations which have been "identified based on information set out in OPDC's Development Capacity Study". Within the Development Capacity Study our client's site is identified as falling within the Park Royal SIL (Broad Location). The sites have been identified where: "a) sites are anticipated to come forward in the first 10 years and that would make a significant contribution to OPDC achieving its homes target, by delivering over 100 homes; b) sites anticipated to be brought forward between 11-20 years and that would make a major contribution to OPDC achieving its homes target, by delivering over 1,000 homes; and/or c) sites anticipated to be brought forward during the plan period and that would make a major contribution to OPDC achieving its jobs target by delivering over 10,000 square metres of commercial floorspace (including A and B-Classes)." Twenty eight sites have been identified within the site allocation process and details are set out regarding their location and the potential quantum of residential and/or commercial development that could come forward. It is noted that the majority of the site allocations are identified as coming forward within the core of the Opportunity Area (north of Wormwood Scrubs). Our client's site should be identified within the site allocations, particularly as the site is cleared and is in the single ownership of Ashia Centur Limited, having been sold by the London Borough of Brent in 1992 specifically for the purposes of its strategic development. As set out within Appendix A, the site benefits from an extant planning permission that comprises a development of 148,256 sqm. This planning permission has been implemented as per the appeal decision under reference number 06/3594. Delivery has been delayed for various reasons, but our client remains committed to resuming works in due course. Unlike 27 of the 28 sites identified within the allocation which are speculative and may never come forward, our client's site can be developed with certainty at any time. On this basis, our client's site should be added to the list of allocated sites with explicit reference to uses and quantum of floorspace permitted.
118	2824	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		The draft Local Plan sets out a vision for Park Royal West. It states that Park Royal West will remain as London's leading location for large, medium and small businesses while the protected industrial land will accommodate a vibrant mix of industrial activities. The vision also notes that comprehensive intensification will accelerate jobs growth and support industrial innovation, making the area adaptable to the future needs of London's economy.

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								It is noted that within the accompanying diagram, Figure 3 'Draft Local Plan Figure 4.24: Park Royal West Place', our client's site is identified as falling within the Strategic Industrial Location (SIL) and that no reference has been made to the existing planning permission which has been implemented and which should be recognised with the accompanying plan. It is noted that the earlier version of the draft Local Plan (Draft for Regulation 18 Consultation) 4 February 2016, under 'P5 Park Royal' made specific reference under paragraph 4.74 to our client's site benefiting from planning permission: "At the western edge, the former Twyford Tip site benefits from an implemented planning permission." It is unclear why this reference has been removed from the Regulation 19 Consultation version and why the latest draft version of the Local Plan has not expanded on this following extensive discussions between our client and the OPDC over the past two years including reference to approved uses, detail in terms of site name, extant permission reference number and approved uses.
118	2825	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		The wording under 'Land Uses' within draft Policy P4 is focussed on the delivery of a mix of broad industrial type uses and does not take into consideration our client's site which has planning permission for 148,256 sqm of retail, leisure, hotel, media uses and sui generis uses. Part B of the policy below should be expanded to include the underlined text. "Contributing towards 3,800 jobs by taking opportunities to intensify the use of sites, having regard to the locations and typologies identified in OPDC's Park Royal Intensification Study and to the extant and implemented 'Century City London' development." It should be noted that the delivery of our site can expect to deliver 2,800 jobs which means that the combined target for the SIL and the Century City site could potentially be substantially higher (assuming that the Century City permission has not been included in the jobs target as it is not referenced in the draft Local Plan.
118	2826	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4	e)	It is noted that reference is made to part of our clients site under part e) of the policy where it states that "e) Safeguarding the Twyford Waste Transfer Station site to support the delivery of the West London Waste Plan (see Policy EU6);" This policy should recognise that it is not possible to safeguard this site on the basis that an implemented permission exists for a strategic redevelopment of 148,256 sqm in size which comprises part of the site and due to access to the Twyford Waste Transfer Station site over our client's land.
118	2827	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		Our client supports the policy ambitions as set out under Public Realm and Movement, Green Infrastructure and the Environment, Heritage and Character, Infrastructure and Development and Phasing sections of Policy P4 which are generally in line with their high quality design ambitions for their site.
118	2828	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4	PRW.6	The supporting text to draft Policy P4 at PRW.6 notes that part of our client's site is a "key site in Park Royal West is Twyford Waste and Recycling Centre, on Abbey Road. This is an existing waste transfer station safeguarded in the adopted West London Waste Plan (WLWP). This site is considered to have particular potential for redevelopment for future waste capacity, including alternative forms of waste management that could result in waste moving up the waste hierarchy. As such, this site will be protected in accordance with Policy EU6." We note that the adopted WLWP is clear that the safeguarded site falls to the south and west of our client's site and that their planning permission will be built out without prejudicing the safeguarded site. Policy P4 and its supporting text needs to be explicit on this point. It should also be noted that discussions have taken place with the GLA in terms of finding an alternative site for the waste/recycling centre which would enable the comprehensive redevelopment of the wider site.
118	2832	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		In summary our client's site needs to be excluded from the SIL boundary and identified as an employment led, mixed use development site suitable for: – Small and larger scale retail uses (Class A1-A5) – Class C1 hotel (including ancillary health club and conference facilities) – Class D1 cultural / exhibition centre – Class D2 leisure uses including cinema – Sui generis uses including casino, theatre, nightclub and television centre – Class B1a Office – Class B1b Research and Development – Class B1c Light industrial for the following reasons: · The site benefits from an extant planning permission for a major mixed use development; · The site at present is cleared and does not contribute towards the provision of industrial uses within the Opportunity Area – this has been the case for the past 25 years; · It will not contribute to the SIL as our client's intention is to complete the development permitted under the extant permission or similar scheme; · The site's removal from the Park Royal SIL (Broad Location) does not compromise the integrity or delivery of the remaining SIL land; · The implemented mixed use planning permission will not prejudice the successful operation of neighbouring industrial uses within the Park Royal SIL; · The site is located at the extreme west of the Opportunity Area and Park Royal SIL and is not a key integrated site within the SIL. The site is bound to the west by the North Circular Road, Abbey Road to the north and canal to the south and as such forms an independent site that is not linked with the remaining SIL; · The site represents a key gateway site into the Opportunity Area from the west; · The consented development is of a high quality design having been designed by Chapman Taylor Architects. The planning permission incorporates the British Pavilion designed for the World Expo, Seville (1992) designed by Sir Norman Foster. · The redevelopment of this site will act as a catalyst for further regenerating development with the Opportunity Area; · The planning permission has the potential to deliver the following:

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								- o 2,800 new jobs; - o 1 million visitors to the site (hotel); - o generate a financial benefits to the Opportunity Area of £15,000,000 per annum; and - o provide 900 to 1000 jobs during construction. The high levels of employment generated by the extant consent could never be achieved (even in part) by a traditional industrial development, nor would it be possible to achieve the high quality landmark development demanded by this important gateway site.
118	2833	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		In conclusion, the draft Local Plan is considered to be unsound as it is necessary to our Client's site to be allocated for the uses the subject of these representations and not as part of the SIL designation. Furthermore, the latest version has removed all reference to our client's extant planning permission which is misleading in terms of the likely deliverability of this location as a SIL in any event.
119	2838	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	Places	P1		The ideas about access from the built up areas into the Wormwood Scrubs are not clearly described in the Local Plan.
119	2839	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	Places	P1		The Trust's opposition to access from the Old Oak Common Station is set out above under Policy SP8.
119	2840	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	Places	P1		A 'green bridge' accessing Wormwood Scrubs further to the east is marked on the sketch map in figure 4.52. There is not enough information provided for the Trust to say whether or not it supports the green bridge. However the Trust welcomes the statement that the OPDC will agree any proposals with the Wormwood Scrubs Charitable Trust, as it must do if the Trust is to fulfil its duties under the Wormwood Scrubs Act.
119	2841	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	Places	P1	Figure 4.52	Figure 4.52 shows in green three connections envisaged from around the station. We believe that this will lead to overuse of the Scrubs to the detriment of it for other users.
119	2842	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	Places	P12	V1	The Trust agrees with the Friends of the Scrubs that the opening sentence of V1 should read 'Wormwood Scrubs will continue to be a cherished open space, more wild than tamed, an important ecological asset and a protected area of Metropolitan Open Land'.
119	2843	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	Places	P12		The Local Plan says that it will protect Wormwood Scrubs as Metropolitan Open Land (MOL) by ensuring proposals accord with policy EU1 and with the London Plan. We strongly support this policy.
119	2845	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	Places	P12		The Plan refers to the 'existing sports pitches and areas in the east and west of the Scrubs are ... susceptible to surface water flooding which restricts their access and their use. Sensitive interventions within and around Wormwood Scrubs will be required to address this flooding which could also fulfil a more strategic management role'. The Plan offers no evidence to back up this assertion. The Trust will consider any proposals for flood management on their merits.
119	2846	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	Places	P12	WS.8	In WS.8. the Plan describes 'sensitive new walking and cycling connections to Wormwood Scrubs to help connect communities to the open space and surrounding destinations are needed to help meet the requirements of the Act and the London Plan'. The following key walking and cycling routes and enhancements are identified in the Plan: • from Old Oak Common Station and surrounds; • from Old Oak North via a green bridge; • from Scrubs Lane via new and improved • sensitively designed points of access; • from Scrubs Lane along a cycling Quietway • located on the southern edge of the Scrubs • connecting with North Kensington; • from Old Oak Common Lane via a widened • footpath and segregated cycling lane; and • from Wormwood Scrubs Street running parallel to • the northern boundary of the Scrubs. The Trust wishes to see evidence of the need for such routes and to be satisfied that they would not in any way be to the detriment of the character of the Scrubs.
119	2847	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	Places	P10		The Trust wants the embankment retained to preserve biodiversity and to form a natural shield from Old Oak, to help preserve the character of the Scrubs.
119	2848	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	Places	P10		The Trust supports the views of the Friend of Wormwood Scrubs that: • It is unclear whether the two green arrows (walking and cycling routes) in Fig 4.42 show intended routes to the east of the Scrubs from Scrubs Lane as opposed to existing routes.
119	2849	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	Places	P10		That a continuous 5 metre wide footpath and 4 metre wide two-way segregated cycle lane...along the west of Scrubs Lane must not encroach onto the Scrubs.
120	2850	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P11		The Harlesden Neighbourhood Forum has always been generally supportive of the regeneration proposals for Old Oak, subject to careful consideration being given to how potential adverse impacts upon Harlesden can be avoided or mitigated. Indeed, with good integration between Old Oak and Harlesden town centre it is likely that benefits will flow to the area. The primary consideration of the Forum, as expressed in its response to consultation on the draft OPDC Local Plan in 2016, has been the need to integrate Harlesden with the new development immediately to the south so that there may be spin-off benefits to the town centre in particular. Concerns were expressed that the draft Plan did not go far enough in promoting improved links.
120	2851	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P11	Figure 4.50	In the Forum's view, the revisions to the draft Plan have reduced the prospects of Harlesden capturing regenerative benefits from Old Oak, with potentially damaging consequences for Harlesden in the future because of impacts from new town centre development at Old Oak. In particular, the new alignment of the High Street, as shown in Fig 4.50 showing it continuing east from the square in front of Willesden Junction station, is effectively taking potential spin-off trade for Harlesden further away from the centre. This is at odds with the intention set

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								out in the Old Oak and Park Royal OAPF, November 2015 which stated that “Town centre uses along Old Oak High Street must connect to Willesden Junction Station and on into Harlesden Town Centre. This is required to improve connections between Harlesden and Old Oak”. The OAPF was clearly planning for the main link to Harlesden to be the obvious short and more direct route to the heart of Harlesden town centre via Station Road. This remained the primary route to Harlesden in the draft Local Plan published in 2016. Both of these earlier plans clearly indicated that there were to be active frontages at Willesden Junction station which would have helped to facilitate movement of people between Old Oak High Street, Willesden Junction station and Harlesden town centre. The current proposals include none of these and, in fact, encourage pedestrians to access Harlesden from Harrow Road rather than Station Road, a significant increase in the walking distance. There is no justification provided in the Plan for extending the High Street eastwards to Harrow Road.
120	2852	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P11		The importance of good linkages, both from the new High Street and Willesden Junction station to Harlesden, cannot be overemphasised. As the OPDC’s Retail Needs and Leisure study concludes, “the majority of the centres within the hierarchy will not be adversely affected”. It goes on to say, “However, simply due to the geography of the development, we do consider that there are potential threats to Harlesden...”. It then goes on to describe, under the heading ‘Threats to Harlesden’, how existing linkages are poor and emphasises the importance of good links. It says: “To enable Harlesden to capture regenerative benefits from investment at Old Oak, it is critical for physical and functional linkages to be improved. If the linkages are not improved, then there is unlikely to be any significant benefit to Harlesden from development within the OPDC area and the regeneration aims in the London Plan may not materialise”. Although it does not state by how much links have to be improved, it is clear that this would have to be very significant given that they say it is “critical” that they are improved. The study goes on to say that when addressing linkages, the following need to be considered: - Type of link - Attractiveness of link - Function of link The study also says “The challenge will be to ensure that Harlesden properly benefits from the development”. In drawing up its new Neighbourhood Plan the Harlesden Neighbourhood Forum has always been mindful of the need to link with new development at Old Oak and to improve the attraction of such links, including to and around Willesden Junction station. The Forum also recognises the need for Harlesden town centre to be complementary to development within Old Oak and that significant improvements to the town centre are needed if Harlesden is to seize the opportunities delivered from the new developments at Old Oak. The Neighbourhood Plan, consequently, has focused on improvements to Station Road and to regenerating the core of the town centre
120	2853	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P11		It appears that the importance of a good link has not been taken into account in revising the Local Plan. It is accepted obviously that the new bridge link across the West Coast Main Line will substantially improve the pedestrian link from Old Oak to Willesden Junction and the plan for a public square in front of a new entrance to Willesden Junction station will help draw people to the area. However, this is insufficient in itself. The Local Plan should revert to the principal link through to Station Road with active frontages adjacent to it.
120	2854	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P11	Figure 4.50	There is a discrepancy between Fig 3.8, which shows the High Street connecting westwards to Station Road and Figure 4.50 on Willesden Junction Place, where it is absent. As indicated above, the Forum think it is critical that the High Street should make a good, attractive connection to Station Road.
120	2855	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P11		Willesden Junction station, as well as a key access point to the proposed redevelopment of the northern part of Old Oak is also, and has been since it was opened, the main public transport access point for Harlesden. It is important for the future of Harlesden that any redevelopment and improvement to the station is of major benefit to those who wish to travel to or from the town centre. It is acknowledged that policies and proposals in the Local Plan, including a new bridge across the West Coast Main Line and a new public square to the east of the station, as illustrated in Figure 4.50, will improve the currently very poor access from Harrow Road to the east and from Old Oak to the south. However, there appears to be very little proposed to improve access to and from the west and Harlesden town centre. Policy “supporting early development on the western side of Willesden Junction station that contributes to a coordinated delivery of Willesden Junction Station upgrades, the enhancement of Station Approach and new connections across this Place” is welcomed. Once again though, it is considered that this does not go far enough. Policy should be that the High Street is proposed to be diverted west in front of the station to join with Station Road and this should be shown in the diagram.
120	2856	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P11		The Forum is aware that no final decision has been taken yet on the preferred configuration for re-modelling the station. However, the key principles for development in the area should not be solely driven by the station design. The future of Harlesden as a town centre is at stake so first considerations should be how the Place can be developed and improved for the benefit of the wider area. For example, it is the Forum’s view that some over station development at the western end with active frontages and the provision of a new entrance facing onto Station Road would bring benefits to Harlesden and its community.
120	2857	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P11		Changes Sought High Street to be shown on Figure 4.50 going westwards from the proposed new square and linking with Harlesden town centre at Station Road. High Street should not be taken east to Harrow Road Entrance to the station to be shown close to Station Road.
120	2858	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P8		The Local Plan should also plan for future development that will facilitate improvements to the link along Station Road. In particular the frontage of the land designated as part of a Strategic Industrial Location (SIL) where the bus depot is located which is within the OPDC Local Plan area. This land currently has, along part of its length, shops and cafes (i.e. active frontages) facing onto the road. Behind is the bus depot. The bus depot site has been identified as having a high environmental impact by the OPDC’S Industrial Land study. It has residential property nearby but, more importantly for establishing a good link between Harlesden town centre and Old Oak, it has its exit/entrance on Station Road causing severance to the free movement of pedestrians along the road. It is the Forum’s view that this land should not be designated as part of the SIL for the following reasons.

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120	2859	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P8		The bus depot site and adjoining land is not appropriately designated as SIL. It is effectively an isolated site because of the railway tracks to the south dividing it from the rest of Park Royal. It is clearly not part of Park Royal but, rather, part of Harlesden. It is adjacent to a residential area, adjoins Harlesden town centre and there are shop units on the Station Road frontage which are designated as SIL. There is a small derelict industrial building to the west of the depot which is also designated as SIL (although it is not clear from OPDC Local Plan Map whether part or none of this site is within the OPDC area). As the London Plan explains in paragraph 2.80, "SILs are given strategic protection because their scale and relatively homogenous character means they can accommodate activities which elsewhere might raise tensions with other land uses". This site clearly raises tensions with other land uses, including residential and town centre uses, and particularly with a link which it is critical to improve so that it is made much more attractive to pedestrians and other road users. The identification of the site as having a high environmental impact in the OPDC's Industrial Land Review, referred to above, shows that it raises tensions with other land uses.
120	2860	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P8		If the land designated as SIL were to be redeveloped under current policy then replacement shops or cafes on the Station Road frontage would be unacceptable under both the proposed OPDC Local Plan and current London Plan policy. Policy E1 of the draft Local Plan ensures that "proposals are comprised of SIL compliant broad industrial type uses". OPDC officers have suggested that any development facing onto the road could comprise 'Positive Frontage'. However, the OPDC Local Plan definition of positive frontage suggests that this would not be anything that would help attract people to Harlesden and would be a step back from the current situation. Together with the continued operation of the bus depot, this would present a long stretch of frontage that would not encourage people to make the trip into Harlesden town centre.
120	2861	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P8		Of course any de-designation of the land as SIL does not mean it would be immediately lost as industrial land or as the location of the bus depot which will no doubt continue operating there for many years. However, it would allow for the site to be redeveloped in the long term if the bus depot could be satisfactorily re-located nearby. It must be possible, and it must be within the powers of the OPDC, to allocate land that is likely to be available for occupation by alternative users after completion of HS2 construction. Such a site, for example, exists immediately on the other side of the railway tracks from the bus depot, i.e. the former freightliner terminal site which is to be used by HS2 during construction of high speed rail link. If a satisfactory relocation of the bus depot could be achieved then redevelopment in an appropriate way would allow for a much better link to be provided by removing the access point to the bus depot and by providing an attractive and active frontage to Station Road, as well as providing the opportunity of contributing to the future of Harlesden with alternative uses.
120	2862	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P8		A recent review of industrial land for the Mayor of London (London Industrial Land Demand, June 2017) concludes that industrial land release across London in recent years has been in excess of benchmark guidance. Their analysis of the industrial land pipeline for West London shows that a substantial amount (75.9 ha) of the planned release is from Ealing and Hammersmith & Fulham because of Old Oak, although Hillingdon is also showing a substantial release of 46 ha through the Local Plan. A consequence of the substantial releases of industrial land is that the Mayor has been advised to reduce the industrial land release benchmark to 9.3 ha per annum across London, a considerable reduction on the 2011 benchmark. Clearly the release of industrial land needs to slow down. However, the use of land is always a balancing act between demanding uses and priorities. The need to slow the release does not mean that there should be a blanket refusal to release any industrial land and certainly does not mean that there should be continued rigid adherence to current boundaries of SIL where it is logical to adjust boundaries and there may be overriding benefits to that adjustment. It is contended that the de-designation of a further 1.2 hectares of inappropriately designated SIL would not reduce the land supply for industry in any significant way. In fact it would not reduce it at all because the bus depot would continue to occupy the site but the frontage could be redeveloped for uses which are appropriate to the key gateway to Harlesden town centre.
120	2863	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P8		London Plan para 2.84 states that "Development in SILs for non-industrial or related uses should be resisted other than as part of a strategically co-ordinated process of consolidation". A major regeneration scheme such as Old Oak, and the preparation of a new Local Plan to facilitate it, provides an opportunity that is unlikely to be repeated for a strategically co-ordinated process of consolidation in this area. If the opportunity to regularise the boundary of the SIL is missed it is a near certainty that Harlesden and its residents will continue to suffer for many years to come from the high environmental impact of this site, and with no prospect of relief from it in the future. Park Royal should be consolidated now on sensible boundaries that will not require review in the future.
120	2864	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P8		The following changes are sought: Land north of the West Coast Mainline bounded by Harley Road and Station Road to be de-designated as part of a Strategic Industrial Location.
120	2868	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P1		Harlesden Neighbourhood Forum welcomes the recognition from OPDC of the threat to Harlesden town centre from new town centre development at Old Oak. To help mitigate this, policies P1, P2 and P11 require that, in bringing forward development proposals, consideration should be given to the need to be "Supporting neighbouring Harlesden district town centre by including a Harlesden Enhancement Strategy within any submitted Town Centre Uses Statement where the proposal in Old Oak South provides over 5,000 sq m of town centre uses". Supporting text to the policies states that potential financial contributions are to be discussed with OPDC and London Borough of Brent. This is insufficiently firm and it is the Forum's view that guidelines should be drawn up and set out in the Plan which will have to be adhered to in determining the level of contributions that need to be made
120	2869	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Places	P1		The Forum is also concerned that the level of development at which a Harlesden Enhancement Strategy, and therefore contributions, will be required is too high at 5,000 sq m. It is possible that most development will be brought forward in smaller plots and, those close to Harlesden in particular could have a harmful impact at below this level of development. The threshold should be 2,500 sq m as this is the level of development that the NPPF states should be the default level for impact assessment where a level has not been set. The potential for this level of development to have a harmful impact is acknowledged elsewhere in the Plan. Policy TCC3 requires that A Class development proposals of over 2,500 sq m outside of the Old Oak High Street major town centre are accompanied by an impact assessment.

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118	2875	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		This high level desk top study suggests that there is strong demand for industrial and logistics space in the wider Opportunity Area, building on what is already well established in the area. Notwithstanding this, there is also an opportunity for a wide range of complementary uses that could form part of a mixed use development on the site.
118	2876	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		Developers and the wider real estate industry have given some consideration as to how the market might adapt to new forms of mixed-use development to accommodate competing demands for land in London. Several industry professionals have suggested “bed and shed” mixed-use facilities in order manage warehousing supply shortfall in urban areas, potentially involving light and/or clean service-based industrial units located in the basement or at ground level, gym on the ground or first floor serving as a noise buffer, residential development on upper floors. This concept might be well-suited to a mixed-use approach on the Client site.
118	2877	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		Competition from strong, well established office markets in West London and the evolution of Wembley as a low cost office location, together with the existing industrial base, would make it a challenge to establish a successful critical mass office destination on this site. However, the improved accessibility delivered by HS2 and the Elizabeth Line (Crossrail) and the growth in residential and a broad range of business uses across the OPDC area will make this site and the wider area more attractive to potential office occupiers, particularly for small to medium scale flexible space.
118	2878	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		While further, more detailed financial and operational analysis would be required, there may be the opportunity for an international branded limited service hotel offer at this location to service the growing OPDC business community.
118	2879	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		Leisure related opportunities are currently limited by the relatively low existing resident population in the immediate vicinity and strong existing provision in the wider area of the key anchor to such schemes – cinemas – with Vue already very well represented. However, future leisure and cinema operator interest should not be discounted given the proposed residential development to the north west of the site and the proposed 24,000 new homes and 55,000 new jobs being created within the OPDC OA.
118	2880	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Places	P4		Retail opportunities appear limited at present, but potential residential and mixed use development on the site, together with new residential development in proximity to the site will likely support a local convenience supermarket and possibly a small parade of every day needs focused retail. The additional population may also support a gym/health and fitness offer.

Design

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9	15	Statutory Consultee	Ronan Torkildsen	Historic England	Design	D8		Historic England welcomes the OPDC's commitment to working with partners to address those heritage assets at risk within/adjacent to the Plan area, and in so doing, reflect the expectation of NPPF paragraph 126. However, could we encourage you to be more explicit in the Plan about the measures/resources which could be applied. We have found that it is reasonable and appropriate for major new development to support positive heritage initiatives that address heritage assets at risk and this can be seen as an important component of the Plan's positive strategy for the conservation and enjoyment of the historic environment (also NPPF paragraph 126). We would highlight, in particular, the plight of both St Mary's and Kensal Green Cemeteries and would encourage contact with Historic England's London Heritage at Risk team (Rebecca Barrett, Principal Adviser) to explore how the OPDC may be well placed to help in this respect, particularly as these heritage assets will no doubt provide an amenity resource for the future residents of the 2,000 new homes and for the 1,100 new workers off Scrubs Lane. Potential initiatives might include for example: St Mary's Cemetery • Improvements to or moving the current works yard. • Improvements to the path treatment, particularly from the Scrub's Lane entrance. Kensal Green Cemetery • Maintenance and repairs to the main gate lodge • Provision of accessible toilets for public use • Improvements to the works compound • Repair/rebuilding on the grade II listed boundary wall, large lengths of which have collapsed • Improvements to the path treatment and re-instatement of lost paths to re-establish the historic layout • Urgent repairs to the grade I listed Anglican Chapel • Improvements to signage across the cemetery • Tree strategy and subsequent implementation – this could include additional tree planting to reinstate lost historic avenues
9	18	Statutory Consultee	Ronan Torkildsen	Historic England	Design	D8		For an effective heritage policy which delivers the Local Plan's ambitions for the historic environment and accords with national plan making policy and guidance, it is important to provide a clear and effective policy on how development, which affects the local area and its heritage assets, will be dealt with. Subject to modest and discreet adjustment, Policy D8 provides a thorough and robust approach to sustain the significance of the area's historic environment and inform and inspire the character and identity of future development. Policy D8 addresses non-designated heritage assets but does not provide policy in relation to how designated heritage assets will be considered. As the Local Plan will be the starting point for decisions on planning applications (NPPF paragraph 12) the appropriate management of change within the historic environment needs be supported by clear policies within it. Heritage policy(s) form an important part of a clear and positive strategy for the historic environment (NPPF Paragraphs 9 and 126). This will in turn support the delivery of development that will afford appropriate protection for heritage asset(s) and make a positive contribution to local character and distinctiveness. As a consequence heritage policy needs to be included in the Plan rather than deferring to the NPPF and national guidance. The following additional text is therefore suggested. "Great weight will be given to the conservation (protection and enhancement) of the Plan areas designated heritage assets including listed buildings, conservation areas, historic parks and gardens, scheduled monuments and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments. Any harm to the significance of a heritage asset must be justified having regard to the public benefits of the proposal; whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset. Development within a conservation area will be expected to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance."
9	19	Statutory Consultee	Ronan Torkildsen	Historic England	Design	D8	(d)	This 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."
9	20	Statutory Consultee	Ronan Torkildsen	Historic England	Design	D8	5.62	It may be wise to also refer here to the statutory test for development proposals within conservation areas i.e. Development within a conservation area will be expected to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance.
9	21	Statutory Consultee	Ronan Torkildsen	Historic England	Design			Finally we would suggest reference in this section of the Plan to the anticipated role of the Historic Environment Record, Local List, Conservation Area Appraisals and Management Plans in shaping future change within the plan area.
12	41	Statutory Consultee	Liz Goodwin OBE	LWARB	Design	D4		Cont)..We would support these principles also being included in the 'well designed buildings' chapter, along with durable materials being recoverable as well as sustainable and adaptable.
17	117	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Design	D1		We suggest that it would be beneficial for the policy to encourage developers to engage in pre-application discussions with statutory consultees.

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17	118	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Design	D8		As well as the protection for statutory heritage designations, such as the Grand Union Conservation Area, we welcome the identification of the Grand Union Canal heritage as one of the five key heritage themes, which applicants will be required to demonstrate that they respond positively to. We suggest that these themes should not be seen as distinct. Policy D8 b)(ii) and/or table 5.2 could be amended so that the plan clearly requires the relationship between the heritage themes to be considered. We note that the OPDC already recognise the importance of these relationships in the plan, for example in policy P10C4. We consider that there are opportunities to use the heritage themes to help develop and define a sense of place in Old Oak and Park Royal. Opportunities should be pursued, including through new development, to deliver schemes to enhance understanding, including through signage and information/interpretation panels, public art, events or multimedia.
24	198	Agent	Harriet Barber MRTPI	Montagu Evans (on behalf of T.A.S.B. Investments Limited)	Design	D5		Our Client supports the OPDC's general approach to securing high quality design, both in terms of built form and public realm. With regard to tall buildings, Policy D5 (Tall Buildings) states that proposals for tall buildings will be supported, provided that they: a) "Accord with latest relevant national guidance, London Plan policies, Policy SP9 and relevant policies within the Places Chapter; b) Deliver outstanding standards of design; c) Deliver significant benefits for the surrounding area and communities; d) Undertake proactive engagement with the community and other relevant stakeholders; e) Do not adversely impact the amenity of their surroundings; and f) Accord with relevant guidance for RAF Northolt safeguarding zones". Policy SP9 (Built Environment) promotes development which delivers high densities and a range of building heights, including tall buildings, in locations identified in the places and/or clusters policies, and/or in areas where there are high levels of existing or planned public transport accessibility. With regard to Park Royal Centre, Policy P6(C1) (ASDA Cluster) identifies the opportunity for a variety of building heights which respond to the local context, including a tall building on the north-eastern corner of the ASDA site. Whilst our Client generally supports the OPDC's approach to tall buildings, we would suggest that there are additional sites within Park Royal Centre, such as 19 Abbey Road, that are not identified within the emerging Local Plan, where greater height may also be appropriate. 19 Abbey Road is located within the heart of Park Royal Centre, at the junction of Abbey Road/Coronation Road/Park Royal Road/Acton Lane and adjacent to Asra House, which extends to 9 storeys in height. A taller building in this location would create a landmark at a key junction and a gateway into Central Middlesex Hospital.
27	222	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Design	D2	b.i	The current wording is too restrictive. 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, for example after daylight hours where the space is not part of a general access route.
27	223	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Design	D5	b)	We recognise the importance of design quality particularly with prominent development and tall buildings but reference to 'outstanding' as a measure is subjective and unclear.
27	224	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Design	D6	b)	The policy should recognise that increasing density can impact on daylight and sunlight particularly as compared with existing sites that are undeveloped or have low lying buildings. In addition, open space can be designed and landscaped to be attractive, useable and provide beneficial amenity even when it receives relatively low levels of sunlight. In seeking to 'maximise' light levels the policy should take in to account other development and regeneration objectives. The wording should recognise striking an appropriate balance.
27	225	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Design	D9	b.iii	The policy should recognise that it may not be possible to achieve the suggested levels of sunlight for all dedicated play, particularly in the case of providing doorstep play which may be dispersed within a scheme. Spaces with lower levels of sunlight can still be designed to provide popular, useable and quality playspace.
28	271	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Design	D2		The policy should refer to the public realm supporting the Healthy Streets approach and sustainable and active travel with cross referencing to policy T1
29	320	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Design	D8		We have assessed the building according to Historic England Guidance and we do not consider that it meets the criteria for local listing for the following reasons: 1 Age – Built in 1938, The Castle is not old enough to have gained any special historic value on the basis of age alone. It is a typical pub of many built in this era. 2 Rarity – The building is rare within the local context but not in the wider context of inter-war pubs in Ealing. Such as The Forester on Leighton Road in West Ealing (Grade II), which is a high quality example of an open plan pub from the inter-war period, constructed in a neo-Georgian and Tudor style. 3 Aesthetic Interest – As an example of the Tudorbethan style, the building does have some limited aesthetic interest. However it is not a high quality example of the style, and is a typical unremarkable example of a pub of this era of which there are many examples. 4 Group Value – There are no other buildings of this architectural style within the visual setting of the pub and so it cannot be considered

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								as part of a group. There is one contemporary building adjacent to the pub, but they do not have a visual or historical dialogue with one another. 5 Archaeological Interest – There is no evidence that suggests that the site may be of archaeological interest. 6 Archival Interest – There are no written records associated with building. 7 Historical Association – The Castle is not connected with any important local figures and so has no associative value. It has been recorded as a popular drinking destination for actors using the nearby BBC rehearsal rooms and so may have some historic links to a number of public figures including the ownership of the Fuller brewery. However there is no evidence of this within the building itself. That it may or may not have been used by unknown BBC employees in the past is not sufficient justification to warrant a local listing. 8 Landmark Status – the building may be considered to be a local feature as it is a “missing tooth” in the area, an anomaly, which is not necessarily positive. Its context has changed significantly since it was built as a pub for factory workers in the late 1920s, and has changed and been eroded over time. This takes away from any heritage value it may have exhibited due to this context 9 Social and communal value – As the building is architecturally isolated it is unlikely to act as a source of local identity. It does however have social value and communal value in common with all pubs by virtue of their very nature and their use. Many public houses are not listed or locally listed, as its use by a local community (its sole purpose) is not enough on its own to justify this This value has changed and has diminished as the local area has been regenerated, and there is no evidence in the pub relating to the BBC rehearsal studios and the activities which took place there (a reason used by the Council to justify its local listing). Due to the above considerations we do not consider that The Castle pub meets the criteria to be locally listed as set out by Historic England and Ealing Council. Although the building has some degree of social and communal value, this is to be expected of all pubs. This in itself is not enough to justify listing or local listing in its own right, it is simply how a public house would be expected to function. The materials and construction quality are not of high quality craftsmanship, and there are better examples elsewhere from the inter-war period throughout London and the rest of the country. Moreover, it has not survived fully intact, such as those which were included in Historic England’s research report on inter-war pubs (Cole, 2015). As such the building falls short of one which would justify local listing. The emphasis of draft policies TCC7 and P7C1 should be reworded accordingly.
30	384	Local Authority	Steve Barton	London Borough of Ealing	Design	D8	c)	It is better that non-designated heritage assets are not designated in local plans but rather maintained as a live register of local heritage assets that helps to evidence what is valuable about a particular asset rather than creating the impression of a fixed and comprehensive list.
33	413	Strategic Partner	Mark Furnish	Sport England	Design			As noted above, Sport England consider that placemaking should create environments that keep a community active by making the active choice the easy choice. This can be achieved by implementing the principles of Active Design within development. Sport England, therefore, would expect that Active Design is stated within the relevant design policies, such as Policy D2: Public Road, Policy D4: Well Designed Buildings and Policy D9: Play Space, so it that is clear what is expected to provide healthy communities pursuant of the strategic policies set out in the Draft Local Plan, particularly Policy SP3: Improving Healthy and Reduction Health Inequalities. Sport England would be happy to work alongside OPDC to entrench Active Design within the regeneration of Old Oak and Park Royal.
33	414	Strategic Partner	Mark Furnish	Sport England	Design	D9		Sport England is keen to ensure opportunities are provided for activity for all ages as this not only has physical, but also mental, emotional and well-being benefits. The requirement, therefore, in Policy D9: Play Space that development should provide or contribute to informal play and recreation provision is welcomed. This requirement would appear to parallel with Sport England’s strategy, especially in relation to children and young people.
37	488	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	Design			We support the design policies in the plan and believe these will be critical for ensuring the area is positively developed. OPDC have appropriately encouraged developments to embrace the area's history, whilst ensuring developments allow these historic sites to be enjoyed by a new generation.
37	499	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	Design	All		ACE believes the nine design policies in the plan are well balanced and provide an effective framework of principles to ensure developments are positively designed. We are pleased to see OPDC’s focus on the quality and functional designs, particularly to ensure developments are accessible for all users and provide an appropriate standard of amenity. ACE supports the approach to conserve and enhance the historic environment by ensuring successful proposals positively respond to and promote the significance of heritage in the area. OPDC have usefully provided practical examples on ‘precedent developments’ for particular policies throughout the plan. We agree that the German Gymnasium in Kings Cross is a good precedent development for conserving and enhancing heritage assets in the area. Lastly, we agree with OPDC’s design policies on the ‘key views’ of the area and how tall buildings have the potential to positively shape the skyline. An attractive skyline for Old Oak will make it a noteworthy destination, similar to Canary Wharf.
42	564	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Design	D1	b)iii)	Part b)iii) states that developers should ‘select a design team that has a range of skills and experience for delivering similar proposals in terms of scale, complexity, use of innovation and high quality design’. Whilst we wholeheartedly support high design aspirations for the OPDC area, planning policy should not involve itself with the appointment of professional firms by private developers, and has no ability to influence this other than obliquely through implementation of its policies. Whilst flexibility is provided in the words ‘where relevant and flexible’, this remains inappropriate. In the case of a 6,500 homes masterplan requiring significant new transport infrastructure, for example, a requirement to have delivered ‘similar proposals’ could well rule out many design firms that would be more than qualified.
42	565	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Design	D1	5.1	Paragraph 5.10 states that design guidelines should be secured through section 106 agreements. However, planning conditions should be used where possible and so we would request that this wording be amended to include planning conditions or, where this is not possible, section 106 agreements.
42	566	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Design	D2	b)	Part b) of this policy requires public access to be provided to private realm ‘from occupation’. This statement takes no account of phasing, in particular sectional completions of larger blocks, and we would suggest is too much detail for a Local Plan document. This level of detail should be determined through a section 106 agreement taking account of the specifics of a proposal.

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42	567	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Design	D2	5.19	Paragraph 5.19 requires information which includes responsibilities and costs and funding arrangements for cleaning, maintenance, repair and replacement. This is all too detailed for a planning application, when a developer will not know the particular arrangements as it will depend on how the asset is to be held and managed, whether there is RP involvement etc. For outline applications this is not possible where designs do not yet exist. We would suggest that a better way to secure this would be through section 106 public realm management plans.
42	568	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Design	D5	5.41	Paragraph 5.41 states that “The increased development capacity of tall buildings can deliver significant benefits for both the surrounding built environment and existing and future local communities. Proposals should be supported by a statement demonstrating how they will deliver these benefits. This statement should include how the consideration of appropriate financial viability elements has informed the delivery of any benefits.” It is not known what it meant by this statement – could it please be clarified?
42	569	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Design	D7		We consider that this policy would benefit from some clarification and reconsideration. The policy currently applies to a range of views, which includes some strategic views (which already have policy weight through the London Plan and LVMF), some views which relate to the setting of a listed building or conservation area and therefore have weight from the requirements of the Planning (Conservation Areas and Listed Buildings) Act, and other views which have no other weight – including local views and some more distant (including ‘kinetic’ views’).
42	570	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Design	D7		The current wording treats all of these views as ‘key views’ and consequently affords them all equal weight, to which we object. The weight to be attributed to each view differs and we would suggest that there is a need for a more sophisticated policy which recognises these different tiers of view. We also consider that the inclusion of kinetic views from elevated railway lines is inappropriate and unnecessary, and that where these are located beyond the boundary of the OPDC, the OPDC should not include them within its Local Plan unless a view is identified in the LVMF or relates to a designated heritage asset. The inclusion of these kinetic views suggests more than mere visibility – it implies that these views are important and that they should influence the design of developments in the OPDC area, with which we disagree given the transient way in which they are experienced by all.
42	571	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Design	D7		The supporting text then goes on to say that the OPDC wishes to understand how the silhouette, bulk, massing and elevational treatment affects key views in static and digital modelling formats, with daytime, evening and night time renders. This is excessive and is detail that should be determined through an EIA scoping exercise, informed by the specific circumstances of a site and proposal.
42	572	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Design	D8	c), 5.3	This policy requires, amongst other things, developments to demonstrate how they ‘promote’ heritage assets. It is not clear how this relates to the NPPF’s requirement to ‘sustain and enhance’ the significance of heritage assets. Part c) of this policy seeks to attach a sequential approach to considering non-designated heritage assets. but then uses the suffix ‘or’ so that it is not clear whether an applicant needs to follow all steps or can provide justification against just one of the criteria. We would welcome clarity. We would also query why there is no policy guidance relating to works to designated heritage assets as there is for non-designated heritage assets. We further consider that the additional detail on this process provided at Table 5.3 goes beyond what the NPPF requires for nondesignated heritage assets, by requiring public benefits to outweigh any harm and by requiring its significance to be ‘exhibited’. Policy requirements relating to non-designated heritage assets should be proportional to the significance of the asset – they should not match the requirements of designated heritage assets, which by their nature are more significant and carry statutory protection. The NPPF simply advises that the effect of an application on the significance of a non-designated heritage asset should be ‘taken into account’ by a local planning authority when determining an application.
42	573	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Design	D9	b)i), 5.70	Policy D9 b)i) and paragraph 5.70 require dedicated play space for 0-5s to be in publicly accessible within Small Open Spaces or Pocket Parks as a priority. Whilst we consider that some should, we do not think this is appropriate for all space. It will be very appropriate for some of it to be in private shared courtyards on podiums, for example, where it can be closer to home. This part of the policy should be removed
42	574	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Design	D9	b)iii)	Policy D9 b)iii) requires 4 hours sunlight on 50% of play space site, on 21 March. We consider that this is likely to be challenging given the development densities required to achieve the strategic housing targets. Omit this reference
47	682	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Design	D7		Key Views should include the view from the Round Pond in Kensington Gardens.
47	689	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Design	D8	para 5.65	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.
56	842	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Design	D4		Following the events of Grenfell Tower, LBHF welcomes any changes to the Local Plan That will improve or raise fire safety for the future residents.
56	869	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Design			In the introduction, mainly with regard to D4 and D5, we should encourage and promote innovative solutions and designs that can deliver high quality and smart design along with high density. We should also encourage applicants to consider international best practice.
56	870	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Design	D4		Add another point: vii. Incorporate urban greening into suitable surfaces of the building and open spaces on the site, including vertical greening to address air quality and flood risk, and to improve the micro climate and biodiversity.
56	871	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Design			Add following text (in italics) to v): only after approval of a replacement building and the submission of a copy of a signed building contract to undertake the works for the replacement building

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56	886	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Design	D9		Play is an essential part of every child's life. It is vital for the enjoyment of childhood as well as for social, emotional, intellectual and physical development. When children are asked about what they think is important in their lives, playing and friends are usually at the top of the list. Children of all ages living in areas of high deprivation such as the College Park and Old Oak wards suffer from lack of opportunities for play. The focus on the provision of play space for 0-5 year olds is welcomed but more development is required on the planning for provision for play for 6 to 18 year olds. In addition as well as designated play spaces the environment needs to be designed to enable street play close to where children live and go to school. Furthermore when schools are modified or newly built sufficiency of areas in schools for active play as well as PE/sport need to be ensured.
57	965	Local Resident	Scott Cawley		Design	D7		A small point about skyline views - it was suggested that certain views will be protected - but it was not clear if these views would be protected as they stand for residents of nearby areas at present, or whether these views would be protected and viewable only from within the OPDC zone itself? For instance, if I turn off Scrubs Lane towards Harlesden High Street and look over the train lines, I can see a good view of London to the South and West. If I am at Willesden Junction high level platforms, I have a good view of London to the South and East. I would consider these skyline views very special - so if these were ones to be protected, will they remain viewable from these locations I mentioned? Or are you intending that a large building could be placed in the way of this view but you would consider it protected because the view could be seen from this building within the OPDC zone?
58	968	Local Resident	Arnaud Demas		Design	D4		Policy D4 is unsound.
61	981	Local Resident	Ron Thorp		Design	D4		"Overdevelopment" Ever heard of it?
61	982	Local Resident	Ron Thorp		Design	D5		Too many tall buildings. Too close together. Cheap & nasty design.
70	1082	Local Resident	Joanna Betts		Design			We are concerned at the projected high-density of the development, and request justification and evidence that the proposed density will result in a sustainable neighbourhood that will be attractive to Londoners. We need justification that existing residents can maintain their quality of life both throughout the construction period and once the new housing and business developments are in place.
70	1083	Local Resident	Joanna Betts		Design	D5		We are particularly concerned at the omission of building heights, given that 3D models, presentation images, and conversations with OPDC staff and board members all point toward an ambition of building heights being 40 stories and up. We do not believe that there is sufficient justification for these heights in this area. It particular, we are concerned about the impact on the quality of life if the HS2 station overbuild, and the area which currently houses the Old Oak Common Depot, includes towers of this type of height. Wells House Road residents request justification as to why building heights of this kind are necessary so close to existing homes, when they will have a demonstrably negative impact upon quality of life, including: blocking out light from gardens, blocking views across London, and overshadowing a long-established low-rise community. As both HS2 and OPDC have described the Old Oak Common area as 'deprived', we ask OPDC to justify the further deprivation of our community that will be caused locally if the development of these high-rise tower blocks goes ahead as currently proposed.
70	1086	Local Resident	Joanna Betts		Design			We also have concerns about OPDC's lack of commitment to quality of design, bearing in mind the inadequate quality of the bland Oaklands development, itself objected to by the local community. This sets a precedent for the area to become another Nine Elms or Canary Wharf – neither of which fulfil the needs of Londoners. We would expect distinctive, characterful building designs with different levels, attractive facades, green space and green walls.
70	1088	Local Resident	Joanna Betts		Design	D6		Residents are concerned about the construction noise, air & light pollution and disruption that further adds to the burden of the next decade of HS2 constructions and means that Wells House Road residents will effectively be at the centre of a massive building site for 20-30 years.
70	1102	Local Resident	Joanna Betts		Design	D8		We would also like to further protect our community by making Wells House Road a conservation area, and to be listed as one of the community assets. In fact, the entire shrunken area that OPDC proposes as the designated neighbourhood forum would be best served as a conservation area.
70	1105	Local Resident	Joanna Betts		Design			Overall, we do not wish this area to become an extension of unpopular North Acton, or to be like other unpopular developments such as Canary Wharf and Nine Elms. These areas demonstrate poor quality in terms of high density, lack of community, lack of green and open spaces, play spaces, provision of social infrastructure, provision of cultural and leisure needs (acknowledged to be in need in the Retail and Leisure needs study), and contribution to existing residents' housing needs. Student housing may come along with a very low expectation of social infrastructure, or provide this internally.
73	1135	Unknown	A. Somefun		Design	D1		Policy is sound (no justification provided)
77	1185	Local Resident	Sarah Abrahart		Design	D1		Policy is unsound (no justification provided)
77	1186	Local Resident	Sarah Abrahart		Design	D2		Policy is unsound (no justification provided)
77	1187	Local Resident	Sarah Abrahart		Design	D4		Policy is unsound (no justification provided)
77	1188	Local Resident	Sarah Abrahart		Design	D5		Tall buildings have no place in West London. They will blight Wormwood Scrubs forever.
77	1189	Local Resident	Sarah Abrahart		Design	D7		Policy is unsound (no justification provided)
77	1190	Local Resident	Sarah Abrahart		Design	D8		Policy is unsound (no justification provided)
81	1223	Community Group	Chloe Fremantle	ArtWest	Design	D5		We feel that the term "tall building" should be further detailed, i.e. What is meant by tall buildings? We do not feel that the area is suitable for extremely tall buildings.
82	1245	Neighbourhood Forum	Henry Peterson	St Quintin and Woodlands Neighbourhood Forum	Design			the 2015 London Plan parameters set for regeneration of the Old Oak area, in terms of housing numbers, will lead to unsustainable levels of density and an unsuccessful urban environment.

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82	1253	Neighbourhood Forum	Henry Peterson	St Quintin and Woodlands Neighbourhood Forum	Design	D5		The Plan does not explain what is meant by 'tall' and 'taller' buildings
82	1257	Neighbourhood Forum	Henry Peterson	St Quintin and Woodlands Neighbourhood Forum	Design	D5		We consider Policy D5 on Tall Buildings to be inadequately justified and unclear
83	1264	Local Resident	Nadia Samara		Design			We are concerned at the projected high-density of the development, and request justification and evidence that the proposed density will result in a sustainable neighbourhood that will be attractive to Londoners. We need justification that existing residents can maintain their quality of life both throughout the construction period and once the new housing and business developments are in place.
83	1265	Local Resident	Nadia Samara		Design	D5		We are particularly concerned at the omission of building heights, given that 3D models, presentation images, and conversations with OPDC staff and board members all point toward an ambition of building heights being 40 stories and up. We do not believe that there is sufficient justification for these heights in this area. It particular, we are concerned about the impact on the quality of life if the HS2 station overbuild, and the area which currently houses the Old Oak Common Depot, includes towers of this type of height. Wells House Road residents request justification as to why building heights of this kind are necessary so close to existing homes, when they will have a demonstrably negative impact upon quality of life, including: blocking out light from gardens, blocking views across London, and overshadowing a long-established low-rise community. As both HS2 and OPDC have described the Old Oak Common area as 'deprived', we ask OPDC to justify the further deprivation of our community that will be caused locally if the development of these high-rise tower blocks goes ahead as currently proposed.
83	1268	Local Resident	Nadia Samara		Design			We also have concerns about OPDC's lack of commitment to quality of design, bearing in mind the inadequate quality of the bland Oaklands development, itself objected to by the local community. This sets a precedent for the area to become another Nine Elms or Canary Wharf – neither of which fulfil the needs of Londoners. We would expect distinctive, characterful building designs with different levels, attractive facades, green space and green walls.
83	1270	Local Resident	Nadia Samara		Design	D6		Residents are concerned about the construction noise, air & light pollution and disruption that further adds to the burden of the next decade of HS2 constructions and means that Wells House Road residents will effectively be at the centre of a massive building site for 20-30 years.
83	1284	Local Resident	Nadia Samara		Design	D8		We would also like to further protect our community by making Wells House Road a conservation area, and to be listed as one of the community assets. In fact, the entire shrunken area that OPDC proposes as the designated neighbourhood forum would be best served as a conservation area.
83	1286	Local Resident	Nadia Samara		Design			Overall, we do not wish this area to become an extension of unpopular North Acton, or to be like other unpopular developments such as Canary Wharf and Nine Elms. These areas demonstrate poor quality in terms of high density, lack of community, lack of green and open spaces, play spaces, provision of social infrastructure, provision of cultural and leisure needs (acknowledged to be in need in the Retail and Leisure needs study), and contribution to existing residents' housing needs. Student housing may come along with a very low expectation of social infrastructure, or provide this internally.
84	1291	Local Resident	Nicholas Kasic		Design			We are concerned at the projected high-density of the development, and request justification and evidence that the proposed density will result in a sustainable neighbourhood that will be attractive to Londoners. We need justification that existing residents can maintain their quality of life both throughout the construction period and once the new housing and business developments are in place.
84	1292	Local Resident	Nicholas Kasic		Design	D5		We are particularly concerned at the omission of building heights, given that 3D models, presentation images, and conversations with OPDC staff and board members all point toward an ambition of building heights being 40 stories and up. We do not believe that there is sufficient justification for these heights in this area. It particular, we are concerned about the impact on the quality of life if the HS2 station overbuild, and the area which currently houses the Old Oak Common Depot, includes towers of this type of height. Wells House Road residents request justification as to why building heights of this kind are necessary so close to existing homes, when they will have a demonstrably negative impact upon quality of life, including: blocking out light from gardens, blocking views across London, and overshadowing a long-established low-rise community. As both HS2 and OPDC have described the Old Oak Common area as 'deprived', we ask OPDC to justify the further deprivation of our community that will be caused locally if the development of these high-rise tower blocks goes ahead as currently proposed.
84	1295	Local Resident	Nicholas Kasic		Design			We also have concerns about OPDC's lack of commitment to quality of design, bearing in mind the inadequate quality of the bland Oaklands development, itself objected to by the local community. This sets a precedent for the area to become another Nine Elms or Canary Wharf – neither of which fulfil the needs of Londoners. We would expect distinctive, characterful building designs with different levels, attractive facades, green space and green walls.
84	1297	Local Resident	Nicholas Kasic		Design	D6		Residents are concerned about the construction noise, air & light pollution and disruption that further adds to the burden of the next decade of HS2 constructions and means that Wells House Road residents will effectively be at the centre of a massive building site for 20-30 years.
84	1311	Local Resident	Nicholas Kasic		Design	D8		We would also like to further protect our community by making Wells House Road a conservation area, and to be listed as one of the community assets. In fact, the entire shrunken area that OPDC proposes as the designated neighbourhood forum would be best served as a conservation area.
84	1313	Local Resident	Nicholas Kasic		Design			Overall, we do not wish this area to become an extension of unpopular North Acton, or to be like other unpopular developments such as Canary Wharf and Nine Elms. These areas demonstrate poor quality in terms of high density, lack of community, lack of green and open spaces, play spaces, provision of social infrastructure, provision of cultural and leisure needs (acknowledged to be in need in the Retail

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								and Leisure needs study), and contribution to existing residents' housing needs. Student housing may come along with a very low expectation of social infrastructure, or provide this internally.
85	1318	Local Resident	Francis, Marc and Caroline Sauzier		Design			We are concerned at the projected high-density of the development, and request justification and evidence that the proposed density will result in a sustainable neighbourhood that will be attractive to Londoners. We need justification that existing residents can maintain their quality of life both throughout the construction period and once the new housing and business developments are in place.
85	1319	Local Resident	Francis, Marc and Caroline Sauzier		Design	D5		We are particularly concerned at the omission of building heights, given that 3D models, presentation images, and conversations with OPDC staff and board members all point toward an ambition of building heights being 40 stories and up. We do not believe that there is sufficient justification for these heights in this area. It particular, we are concerned about the impact on the quality of life if the HS2 station overbuild, and the area which currently houses the Old Oak Common Depot, includes towers of this type of height. Wells House Road residents request justification as to why building heights of this kind are necessary so close to existing homes, when they will have a demonstrably negative impact upon quality of life, including: blocking out light from gardens, blocking views across London, and overshadowing a long-established low-rise community. As both HS2 and OPDC have described the Old Oak Common area as 'deprived', we ask OPDC to justify the further deprivation of our community that will be caused locally if the development of these high-rise tower blocks goes ahead as currently proposed.
85	1322	Local Resident	Francis, Marc and Caroline Sauzier		Design			We also have concerns about OPDC's lack of commitment to quality of design, bearing in mind the inadequate quality of the bland Oaklands development, itself objected to by the local community. This sets a precedent for the area to become another Nine Elms or Canary Wharf – neither of which fulfil the needs of Londoners. We would expect distinctive, characterful building designs with different levels, attractive facades, green space and green walls.
85	1324	Local Resident	Francis, Marc and Caroline Sauzier		Design	D6		Residents are concerned about the construction noise, air & light pollution and disruption that further adds to the burden of the next decade of HS2 constructions and means that Wells House Road residents will effectively be at the centre of a massive building site for 20-30 years.
85	1338	Local Resident	Francis, Marc and Caroline Sauzier		Design	D8		We would also like to further protect our community by making Wells House Road a conservation area, and to be listed as one of the community assets. In fact, the entire shrunken area that OPDC proposes as the designated neighbourhood forum would be best served as a conservation area.
85	1340	Local Resident	Francis, Marc and Caroline Sauzier		Design			Overall, we do not wish this area to become an extension of unpopular North Acton, or to be like other unpopular developments such as Canary Wharf and Nine Elms. These areas demonstrate poor quality in terms of high density, lack of community, lack of green and open spaces, play spaces, provision of social infrastructure, provision of cultural and leisure needs (acknowledged to be in need in the Retail and Leisure needs study), and contribution to existing residents' housing needs. Student housing may come along with a very low expectation of social infrastructure, or provide this internally.
86	1357	Community Group	Nicholas Fernley	Hammersmith and Fulham Historic Buildings Group	Design	D8		Although there are now very few historic buildings left in the LBHF part of the OPDA, there are several buildings in other parts of the OPDA area. The Torpedo building is of historic interest from its role in WWII, and is also one of the oldest buildings in the area, dating from c.1908. There are several red brick buildings along Park Royal Road that are worth retaining. John Goodier, a member of our Group, has offered to help identify such buildings. He has already assisted the Grand Union Alliance and the Canal and River Trust on these matters. We are sure that many local residents have more detailed knowledge and experience, and would like to become involved in this work.
86	1358	Community Group	Nicholas Fernley	Hammersmith and Fulham Historic Buildings Group	Design	D8		There are several areas of housing in and adjacent to the OPDA area that are of interest historically and of sufficient quality to remain in use. The most obvious is the Railway housing on either side of Old Oak Lane. The other sites, with a few nearby estates, provide a survey of middle-market housing, from Wells House of 1908 to the Leamington Park Hospital site, post 1983, and the Collective of recent construction (but on a site that was a factory in c.1909). Maybe some of these could be made into a housing Conservation Area that consists of several discrete but separated areas.
86	1359	Community Group	Nicholas Fernley	Hammersmith and Fulham Historic Buildings Group	Design	D8		Beyond the identification, conservation and recording of the built and natural heritage, there is the heritage of experience. We would suggest retaining street names (even where the road alignment has changed). Commemoration of some of the companies and people in building names would be welcome: in particular, the Allnatt brothers who almost by accident became the major developers of the North Acton area, and thus arguably the reason why there is an OPDA at all. The other important historical event is the development by Lyons (a major company in LBHF for many years and a pioneer in food production) of the first office computer, which was built in Minerva Road. Unfortunately their main works was pulled down, but some other buildings they used remain. The Lyons Electronic Office (LEO) is the sort of high-tech innovative enterprise that OPDA wants to attract. There were other companies of equal vision.
87	1365	Local Resident	Patrick Munroe		Design			We are concerned at the projected high-density of the development, and request justification and evidence that the proposed density will result in a sustainable neighbourhood that will be attractive to Londoners. We need justification that existing residents can maintain their quality of life both throughout the construction period and once the new housing and business developments are in place.
87	1366	Local Resident	Patrick Munroe		Design	D5		We are particularly concerned at the omission of building heights, given that 3D models, presentation images, and conversations with OPDC staff and board members all point toward an ambition of building heights being 40 stories and up. We do not believe that there is sufficient justification for these heights in this area. It particular, we are concerned about the impact on the quality of life if the HS2 station overbuild, and the area which currently houses the Old Oak Common Depot, includes towers of this type of height. Wells House Road residents request justification as to why building heights of this kind are necessary so close to existing homes, when they will have a demonstrably negative impact upon quality of life, including: blocking out light from gardens, blocking views across London, and overshadowing a long-established low-rise community. As both HS2 and OPDC have described the Old Oak Common area as 'deprived', we ask OPDC to justify the further deprivation of our community that will be caused locally if the development of these high-rise tower blocks goes ahead as currently proposed.
87	1369	Local Resident	Patrick Munroe		Design			We also have concerns about OPDC's lack of commitment to quality of design, bearing in mind the inadequate quality of the bland Oaklands development, itself objected to by the local community. This sets a precedent for the area to become another Nine Elms or

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								Canary Wharf – neither of which fulfil the needs of Londoners. We would expect distinctive, characterful building designs with different levels, attractive facades, green space and green walls.
87	1371	Local Resident	Patrick Munroe		Design	D6		Residents are concerned about the construction noise, air & light pollution and disruption that further adds to the burden of the next decade of HS2 constructions and means that Wells House Road residents will effectively be at the centre of a massive building site for 20-30 years.
87	1385	Local Resident	Patrick Munroe		Design	D8		We would also like to further protect our community by making Wells House Road a conservation area, and to be listed as one of the community assets. In fact, the entire shrunken area that OPDC proposes as the designated neighbourhood forum would be best served as a conservation area.
87	1387	Local Resident	Patrick Munroe		Design			Overall, we do not wish this area to become an extension of unpopular North Acton, or to be like other unpopular developments such as Canary Wharf and Nine Elms. These areas demonstrate poor quality in terms of high density, lack of community, lack of green and open spaces, play spaces, provision of social infrastructure, provision of cultural and leisure needs (acknowledged to be in need in the Retail and Leisure needs study), and contribution to existing residents' housing needs. Student housing may come along with a very low expectation of social infrastructure, or provide this internally.
88	1392	Local Resident	Lily Gray		Design			We are concerned at the projected high-density of the development, and request justification and evidence that the proposed density will result in a sustainable neighbourhood that will be attractive to Londoners. We need justification that existing residents can maintain their quality of life both throughout the construction period and once the new housing and business developments are in place.
88	1393	Local Resident	Lily Gray		Design	D5		We are particularly concerned at the omission of building heights, given that 3D models, presentation images, and conversations with OPDC staff and board members all point toward an ambition of building heights being 40 stories and up. We do not believe that there is sufficient justification for these heights in this area. It particular, we are concerned about the impact on the quality of life if the HS2 station overbuild, and the area which currently houses the Old Oak Common Depot, includes towers of this type of height. Wells House Road residents request justification as to why building heights of this kind are necessary so close to existing homes, when they will have a demonstrably negative impact upon quality of life, including: blocking out light from gardens, blocking views across London, and overshadowing a long-established low-rise community. As both HS2 and OPDC have described the Old Oak Common area as 'deprived', we ask OPDC to justify the further deprivation of our community that will be caused locally if the development of these high-rise tower blocks goes ahead as currently proposed.
88	1396	Local Resident	Lily Gray		Design			We also have concerns about OPDC's lack of commitment to quality of design, bearing in mind the inadequate quality of the bland Oaklands development, itself objected to by the local community. This sets a precedent for the area to become another Nine Elms or Canary Wharf – neither of which fulfil the needs of Londoners. We would expect distinctive, characterful building designs with different levels, attractive facades, green space and green walls.
88	1398	Local Resident	Lily Gray		Design	D6		Residents are concerned about the construction noise, air & light pollution and disruption that further adds to the burden of the next decade of HS2 constructions and means that Wells House Road residents will effectively be at the centre of a massive building site for 20-30 years.
88	1412	Local Resident	Lily Gray		Design	D8		We would also like to further protect our community by making Wells House Road a conservation area, and to be listed as one of the community assets. In fact, the entire shrunken area that OPDC proposes as the designated neighbourhood forum would be best served as a conservation area.
88	1414	Local Resident	Lily Gray		Design			Overall, we do not wish this area to become an extension of unpopular North Acton, or to be like other unpopular developments such as Canary Wharf and Nine Elms. These areas demonstrate poor quality in terms of high density, lack of community, lack of green and open spaces, play spaces, provision of social infrastructure, provision of cultural and leisure needs (acknowledged to be in need in the Retail and Leisure needs study), and contribution to existing residents' housing needs. Student housing may come along with a very low expectation of social infrastructure, or provide this internally.
89	1428	Local Resident	Nicky Guymer		Design	D5		TITRA wants this draft Local Plan to be much clearer over its intended building heights and densities - if it doesn't do this, it's not following National Planning Guidelines. Although the plan talks about "a variety of building heights, a range of building heights, and to taller or tallbuildings" they aren't outlined in Policies SP2 or SP4, nor in Policy SP9 on the Built Environment. TITRA objects to tall buildings Policy D5 because it never says what a 'tall building' actually is, so people can't judge if the thinking behind plans for them is sound.
89	1430	Local Resident	Nicky Guymer		Design			The draft Local Plan is not clear about housing densities, with "indicative" housing densities of 300-600 units/hectare buried in its separate Development Capacity Study.
91	1460	Local Resident	Bruce Stevenson		Design	D5		TITRA wants this draft Local Plan to be much clearer over its intended building heights and densities - if it doesn't do this, it's not following National Planning Guidelines. Although the plan talks about "a variety of building heights, a range of building heights, and to taller or tallbuildings" they aren't outlined in Policies SP2 or SP4, nor in Policy SP9 on the Built Environment. TITRA objects to tall buildings Policy D5 because it never says what a 'tall building' actually is, so people can't judge if the thinking behind plans for them is sound.
91	1462	Local Resident	Bruce Stevenson		Design			The draft Local Plan is not clear about housing densities, with "indicative" housing densities of 300-600 units/hectare buried in its separate Development Capacity Study.
92	1485	Community Group	Tom Ryland	Hammersmith Society	Design	D5		The Hammersmith Society still believe the following are key objectives for the development of the OPDC area : The importance of specific reassessment with regard to tall buildings in the lightof the recent Grenfell Tower tragedy.
92	1573	Community Group	Tom Ryland	Hammersmith Society	Design	D1		We support the objectives set out in D1: Strategic Policy for Design pp. 141 - 142.
92	1574	Community Group	Tom Ryland	Hammersmith Society	Design	D1		We are pleased that the highly unsatisfactory images which accompanied the previous Reg 18 draft have been discarded. However, the photographs of building precedents

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								which have replaced them overwhelmingly show buildings of 8-14 storeys, which is unrealistic and misleading for the OPDC area in view of the current proposals.
92	1575	Community Group	Tom Ryland	Hammersmith Society	Design	D1		D1: Securing High Quality Design. The problem is 'how is high quality design' going to be measured and achieved. The OPDC Place Review Group (Policy D1 text 5.6)– so far has not delivered any distinguished design. We consider that the Place Review Group as currently constituted is not fit for purpose as its members are neither local or have understanding of what local people would wish to see. It should be reformed with a mixture of architects, other construction professionals and experienced lay members. The model now in place for Hammersmith and Fulham Council should be considered.
92	1576	Community Group	Tom Ryland	Hammersmith Society	Design	D1		We believe there is a potential conflict of interest between the role of the OPDC as 'Development Corporation' and 'Planning Authority' : This is why independent Design Review proposed above is so important.
92	1577	Community Group	Tom Ryland	Hammersmith Society	Design	D1		We support para 5.9 penalties if there is a switch to cheaper design & build options.
92	1579	Community Group	Tom Ryland	Hammersmith Society	Design	D2		D2: Public Realm. This policy is most important in ensuring high quality in the design of the Public Realm and we support the policy and the supporting text. The quality of public space will be one of the key factors by which the success of the project is judged.
92	1580	Community Group	Tom Ryland	Hammersmith Society	Design	D2		Reference is made to King's Cross but we would also cite Canary Wharf, the Olympic Park and Royal Borough of Kensington and Chelsea where high standards have been achieved. It will be up to the OPDC to ensure that design is co-ordinated. We would suggest that OPDC prepare guidance on the choice of materials and standard designs for hard landscaping. The London Borough of Hammersmith and Fulham have produced their StreetSmart guides but there are many other examples.
92	1581	Community Group	Tom Ryland	Hammersmith Society	Design	D2		We would like to see clearer definition as to who provides and who manages the public realm. Public spaces must be genuinely public.
92	1583	Community Group	Tom Ryland	Hammersmith Society	Design	D4		D4: Well-Designed Buildings. We support the policy and supporting text. We note that the previous separate section on Alterations and Extensions has now been incorporated into this single policy. We have already noted our concerns as to how and who assesses the designs.
92	1584	Community Group	Tom Ryland	Hammersmith Society	Design	D5		D5: Tall Buildings. We have already expressed our concern at the failure to discuss specific building heights which are vague and misleading and therefore not Justified or Effective. Buried in the Environmental Standard Study is a reference to 40-60 storey heights which we regard as completely unacceptable in the context of the OPDC area. (Reference - OPDC Environmental Standards Study p30 :Tall Buildings).
92	1585	Community Group	Tom Ryland	Hammersmith Society	Design	D5		The Plan should be clear and transparent about heights.
92	1586	Community Group	Tom Ryland	Hammersmith Society	Design	D5		We share the following concerns with the GUA : • There is concern that the high-rise blocks, which seem also to be synonymous with luxury development, might also be left empty for much of the time – with apartments used more like a hotel than homes. This is not conducive to developing sustainable and lifetime neighbourhoods. The property market at the high end is also collapsing.
92	1587	Community Group	Tom Ryland	Hammersmith Society	Design	D5		We share the following concerns with the GUA :The management and maintenance costs of high-rise homes are much higher than those of lower-rise homes which would make it difficult to change their tenure at any time and indeed to include low cost rented housing from the start.
92	1588	Community Group	Tom Ryland	Hammersmith Society	Design	D5		We share the following concerns with the GUA :Community representatives are keen that the OPDC should look at international examples and also past developments to examine both good and bad examples of optimising density without having to develop high-rise buildings
92	1589	Community Group	Tom Ryland	Hammersmith Society	Design	D5		We commend projects such as Bosco Verticale in Milan as excellent examples as to how tall residential buildings can avoid being dehumanising.
92	1590	Community Group	Tom Ryland	Hammersmith Society	Design	D5		Caution must be taken until the results of the Public Inquiry into the Grenfell fire disaster in accepting any new proposals for tall buildings. We note with concern that the proposals so far approved for towers at Mitre Yard and North Kensington Gate (each approximately 20 storeys) have been designed with single stair access.
92	1591	Community Group	Tom Ryland	Hammersmith Society	Design	D6		D6: Amenity. The Hammersmith Society has always set great store by importance of good standards of amenity. Our Borough's standards considerably exceed those of the London Plan and should be considered. However, we broadly support the objectives set out in pp. 149 – 151.
92	1592	Community Group	Tom Ryland	Hammersmith Society	Design	D7		D7: Key Views. We support the policy and supporting text.
92	1593	Community Group	Tom Ryland	Hammersmith Society	Design	D8		D8: Heritage. We would like to commend John Goodier of the Hammersmith and Fulham Historic Buildings Group for his analysis of the Old Oak Area, and particularly his paper : "Old Oak Outline Historical Area Assessment".
92	1596	Community Group	Tom Ryland	Hammersmith Society	Design	D8		We wish to encourage Heritage-led development where appropriate.
92	1599	Community Group	Tom Ryland	Hammersmith Society	Design	D8		OPDC should prepare a comprehensive Local List of all non-designated heritage assets.

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92	1601	Community Group	Tom Ryland	Hammersmith Society	Design	D9		There needs to be provision for all age groups but with special attention to play spaces for teenagers who are often overlooked.
92	1703	Community Group	Tom Ryland	Hammersmith Society	Design	D8		We also believe the area should build on existing cultural heritage/industrial legacy.
92	1728	Community Group	Tom Ryland	Hammersmith Society	Design	D5		This is a subject which exercises many people greatly : Here are a few suggestions as to how the criteria might be set up. See Glossary for our suggested amended definition. Tall buildings should not be accepted as a norm but specific case needs to be made for them We would suggest that where any building is proposed taller than 27 metres (equivalent to approximately 9 residential storeys), there should be an automatic trigger for special assessment, whether it is significantly taller than those around it or not, including extensions to existing buildings. There needs to be allowance for different floor heights for different uses, therefore the actual height including any visible roof top equipment should be quoted.
92	1729	Community Group	Tom Ryland	Hammersmith Society	Design	D5		In a Parliamentary enquiry in 2002, it was concluded that tall buildings are not essential to the urban renaissance : They are only one of several ways to increasing building densities.
92	1730	Community Group	Tom Ryland	Hammersmith Society	Design	D5		The location of tall buildings is of paramount importance and special attention should be paid to the historic context.
92	1731	Community Group	Tom Ryland	Hammersmith Society	Design	D5		Need to consider the 'Tall Buildings' Historic England guidance note: This Historic England Advice Note supersedes English Heritage/CABE guidance 2007 and seeks to: • Enable areas appropriate for tall buildings to be identified in advance within the local development plan or framework; • Enable proper consultation at the plan- making stage on the fundamental questions of principle and design; • Reduce the scope for unnecessary, speculative applications in the wrong places; • Protect the historic environment and the qualities which make a city or area special; • Highlight opportunities for the removal of past mistakes and their replacement by development of an appropriate quality; • Set out an overall vision for the future of a place. Location of Tall Buildings Tall buildings should not be positioned where they: • Obstruct views from key vantage-points • Have a detrimental impact on the historic environment* • Have a significant adverse impact on the amenity of nearby occupiers Tall buildings may be appropriate: • Close to good public transport infrastructure • Close to other tall residential or commercial clusters of tall buildings where it can be demonstrated that a new tall building serves to raise the quality and coherence of the cluster • At locations where the provision of a landmark building would clearly improve the legibility of the city
92	1732	Community Group	Tom Ryland	Hammersmith Society	Design	D5		We would like to see the Planning Authority support the view of bodies such as English Heritage that the location selected for a tall building should be suitable in terms of its effect on the historic environment at a city-wide as well as a local level. If the location is not suitable, then no tall building will be acceptable, however good the design. Only if it can be demonstrated that the location and context are appropriate will other factors including design quality be addressed. This guidance specifically relates to locations where the special historic character makes it sensitive to change of any kind, particularly any change to the existing balance of dominance between structures and open spaces. In line with good conservation practice such an assessment should be based on a comprehensive assessment of historic character and not simply assumptions about how well a place could or could not accommodate a tall building.
92	1733	Community Group	Tom Ryland	Hammersmith Society	Design	D5		A key failing of tall buildings in the past has been the way they meet the ground and therefore how they are perceived/experienced at the short- distance. Ultimately the aim should be to create a public realm with a human scale. Human scale need not necessarily be prejudiced by high buildings, provided that these are carefully located, designed with a top and a bottom and have regard to the effects on the microclimate. This often involves the following: • Stepping down a large mass to its neighbours; • Ensuring that the ground level most relevant to the pedestrian experience is as active and interesting as possible; • Ensuring that the public realm is naturally surveilled; • Providing legible and accessible entrances; • The scale, form, massing, proportion and silhouette of the building. • The design of the top of a tall building. This will be of particular importance when considering the effect on the skyline. • The relationship of the building to other structures. • The materials used to face the building. Material samples will need to be submitted. • The assessment will be looking for buildings that are far better designed than previously and be icons of architectural quality in themselves. • Creating Excellent Buildings – A guide for clients (CABE, 2003) • Design Review – Guidance on how CABE evaluates quality in architecture and urban design (CABE, 2002) – See below. • Views Assessment (see Appendix E on the preparation of Accurate Visual Representations) • Design Statement Physical Model Material samples.
92	1734	Community Group	Tom Ryland	Hammersmith Society	Design	D5		In addition tall buildings must also be assessed on : • An evaluation of the overall density in a particular area • Effect on the general environment and microclimate • Effect on the historic environment

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								• Their accessibility to public and road transport • Their contribution to legibility/permeability of the wider area • The public accessibility of the building • Sustainability
92	1735	Community Group	Tom Ryland	Hammersmith Society	Design	D5		Objectives of the Tall Buildings Policy To summarise : The overall objectives of the policy should be to meet the following objectives. • To ensure that any proposed new tall building would reinforce the attractive and varied qualities of the boroughs built environment in order to create a positive image and identity. • To ensure any new proposed tall building would be of a high standard of design and of architectural excellence, ensuring that it is sympathetically integrated within the local and city context, and respects principal views across the city and adjoining boroughs. • To ensure any proposed new tall building satisfies sustainable development objectives (as expressed through sustainability appraisal). • To ensure that any proposed new tall building would preserve and enhance the character and appearance of Conservation Areas, and other areas, and listed buildings of special interest and character.
93	1740	Residents Association		Wells House Road Residents Association	Design			We are concerned at the projected high-density of the development, and request justification and evidence that the proposed density will result in a sustainable neighbourhood that will be attractive to Londoners. We need justification that existing residents can maintain their quality of life both throughout the construction period and once the new housing and business developments are in place.
93	1741	Residents Association		Wells House Road Residents Association	Design	D5		We are particularly concerned at the omission of building heights, given that 3D models, presentation images, and conversations with OPDC staff and board members all point toward an ambition of building heights being 40 stories and up. We do not believe that there is sufficient justification for these heights in this area. It particular, we are concerned about the impact on the quality of life if the HS2 station overbuild, and the area which currently houses the Old Oak Common Depot, includes towers of this type of height. Wells House Road residents request justification as to why building heights of this kind are necessary so close to existing homes, when they will have a demonstrably negative impact upon quality of life, including: blocking out light from gardens, blocking views across London, and overshadowing a long-established low-rise community. As both HS2 and OPDC have described the Old Oak Common area as 'deprived', we ask OPDC to justify the further deprivation of our community that will be caused locally if the development of these high-rise tower blocks goes ahead as currently proposed.
93	1744	Residents Association		Wells House Road Residents Association	Design			We also have concerns about OPDC's lack of commitment to quality of design, bearing in mind the inadequate quality of the bland Oaklands development, itself objected to by the local community. This sets a precedent for the area to become another Nine Elms or Canary Wharf – neither of which fulfil the needs of Londoners. We would expect distinctive, characterful building designs with different levels, attractive facades, green space and green walls.
93	1746	Residents Association		Wells House Road Residents Association	Design	D6		Residents are concerned about the construction noise, air & light pollution and disruption that further adds to the burden of the next decade of HS2 constructions and means that Wells House Road residents will effectively be at the centre of a massive building site for 20-30 years.
93	1760	Residents Association		Wells House Road Residents Association	Design	D8		We would also like to further protect our community by making Wells House Road a conservation area, and to be listed as one of the community assets. In fact, the entire shrunken area that OPDC proposes as the designated neighbourhood forum would be best served as a conservation area.
93	1762	Residents Association		Wells House Road Residents Association	Design			Overall, we do not wish this area to become an extension of unpopular North Acton, or to be like other unpopular developments such as Canary Wharf and Nine Elms. These areas demonstrate poor quality in terms of high density, lack of community, lack of green and open spaces, play spaces, provision of social infrastructure, provision of cultural and leisure needs (acknowledged to be in need in the Retail and Leisure needs study), and contribution to existing residents' housing needs. Student housing may come along with a very low expectation of social infrastructure, or provide this internally.
94	1776	Local Resident	Oonagh Heron		Design	D5		Building heights: I was expecting clear indications over the heights of buildings in the area (as per the National Planning Guidelines, paragraph 010). Without knowing how high they might be, I can't make any sensible estimation about whether I think the planning behind them is sufficient. Especially in light of the Grenfell tragedy, I want considerably more specificity around tall residential buildings. I remain dismayed by the 24 storeys in the Oaklands development, which is out of scale for the area. Clarity would also enable me to check whether smaller scale areas (such as my railway cottages) are being loomed over by large scale blocks creating mismatch in scale.
95	1784	Local Resident	Mark Walker		Design	D5		I need this draft Local Plan to be much clearer over intended building heights and densities in regeneration – I can't understand the policies. And if it doesn't make all this clear, it's not really following National Planning Guidelines. Examples of this include: Although the Plan talks about tall buildings and different heights, they aren't revealed by Policies SP2 or SP4, nor in Policy SP9 on the Built Environment. I object to tall buildings Policy D5 because it never says what a 'tall building' actually is, so I can't possibly judge it.
95	1786	Local Resident	Mark Walker		Design			The draft Local Plan is not clear about housing densities, with "indicative" housing densities of 300-600 units/hectare buried in its separate Development Capacity Study.
97	1821	Local Resident	Ralph Scully		Design			We are concerned at the projected high-density of the development, and request justification and evidence that the proposed density will result in a sustainable neighbourhood that will be attractive to Londoners. We need justification that existing residents can maintain their quality of life both throughout the construction period and once the new housing and business developments are in place.
97	1822	Local Resident	Ralph Scully		Design	D5		We are particularly concerned at the omission of building heights, given that 3D models, presentation images, and conversations with OPDC staff and board members all point toward an ambition of building heights being 40 stories and up. We do not believe that there is sufficient justification for these heights in this area. It particular, we are concerned about the impact on the quality of life if the HS2 station overbuild, and the area which currently houses the Old Oak Common Depot, includes towers of this type of height. Wells House Road residents request justification as to why building heights of this kind are necessary so close to existing homes, when they will have a

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								demonstrably negative impact upon quality of life, including: blocking out light from gardens, blocking views across London, and overshadowing a long-established low-rise community. As both HS2 and OPDC have described the Old Oak Common area as 'deprived', we ask OPDC to justify the further deprivation of our community that will be caused locally if the development of these high-rise tower blocks goes ahead as currently proposed.
97	1825	Local Resident	Ralph Scully		Design			We also have concerns about OPDC's lack of commitment to quality of design, bearing in mind the inadequate quality of the bland Oaklands development, itself objected to by the local community. This sets a precedent for the area to become another Nine Elms or Canary Wharf – neither of which fulfil the needs of Londoners. We would expect distinctive, characterful building designs with different levels, attractive facades, green space and green walls.
97	1827	Local Resident	Ralph Scully		Design	D6		Residents are concerned about the construction noise, air & light pollution and disruption that further adds to the burden of the next decade of HS2 constructions and means that Wells House Road residents will effectively be at the centre of a massive building site for 20-30 years.
97	1841	Local Resident	Ralph Scully		Design	D8		We would also like to further protect our community by making Wells House Road a conservation area, and to be listed as one of the community assets. In fact, the entire shrunken area that OPDC proposes as the designated neighbourhood forum would be best served as a conservation area.
97	1844	Local Resident	Ralph Scully		Design			Overall, we do not wish this area to become an extension of unpopular North Acton, or to be like other unpopular developments such as Canary Wharf and Nine Elms. These areas demonstrate poor quality in terms of high density, lack of community, lack of green and open spaces, play spaces, provision of social infrastructure, provision of cultural and leisure needs (acknowledged to be in need in the Retail and Leisure needs study), and contribution to existing residents' housing needs. Student housing may come along with a very low expectation of social infrastructure, or provide this internally.
100	1876	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Design	D5		We do not support Policy D5 on Tall Buildings, on the basis that this provides no clarity as to what is deemed a 'tall building'. Specifically, we oppose sub-paragraphs c(ii) on legibility and c(iii) on enhancing the skyline and increasing the identity of an area
100	1895	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Design	D5		Policy D5 on Tall Buildings is silent on the specifics of building heights and the accompanying text on page 148 gives no indication as to the expected range of building heights within the OPDC area.
100	1975	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Design	D1		We support the view of the Grand Union Alliance that Policy D1 is not effective and needs further strengthening to ensure the achievement of high quality liveable and sustainable Lifetime Neighbourhoods. In particular D1iii) should refer to engagement with local people, via neighbourhood forums in the area and other means, as early as possible in the design process ⁹ . We have suggested above that the OPDC Place Review Group (referred to in D5ii) should include one or more representative of a local amenity body or residents association.
100	1976	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Design	D5		Policy D5 is not effective, as its content, the justificatory document (and indeed the whole Local Plan document) gives no definitions of what will constitute 'tall' or 'taller' buildings under this Policy.
100	1977	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Design	D5		We consider sub-policies D5c)ii) and D5c)iii) to be not justified. Arguments that tall buildings provide 'legibility' and 'identity' to areas are routinely used by developers, and endorsed by Design Review Panels (including the OPDC Place Review Group) and by planning officers as justifications for tall buildings. The value of tall buildings for 'legibility' is much diminished in an era when the majority of the population carry GPS maps on their phones. The value of tall buildings as creating 'identity' has become increasingly meaningless when local areas experience a surfeit of 'landmark' and 'gateway' buildings as already being experienced in the OPDC area.
103	2103	Local Resident	Dave Turner		Design	D5		TITRA wants this draft Local Plan to be much clearer over its intended building heights and densities - if it doesn't do this, it's not following National Planning Guidelines. Although the plan talks about "a variety of building heights, a range of building heights, and to taller or tallbuildings" they aren't outlined in Policies SP2 or SP4, nor in Policy SP9 on the Built Environment. TITRA objects to tall buildings Policy D5 because it never says what a 'tall building' actually is, so people can't judge if the thinking behind plans for them is sound.
104	2127	Community Group	Del Brenner	Regents Network	Design			The acres of glass used in developments including OPDC has an unfortunate negative effect as it has a very hard and unforgiving appearance, and all too often impractical because of the level of maintenance. Perhaps it is overused (as with cladding) as it is a lower-cost method of construction, and yes many recent towers around London do look cheap.
104	2128	Community Group	Del Brenner	Regents Network	Design			There is no guarantee that the Local Plan will succeed in the architecture of the buildings in Old Oak being of top quality, as there are only 20 pages (out of 304pp) devoted to Design. Perhaps the Plan can blame computers, as illustrated, to provide the humdrum repetitive appearance of the huge towers. Computers readily provide square shapes, and at the press of a button floor upon floor can be stacked up with each floor being identical. Too many buildings do not even have a top, they just stop at the required number of floors. That has not got a lot to do with design.
104	2129	Community Group	Del Brenner	Regents Network	Design	D4		The Local Plan does have some helpful comments such as in Policy D4 'Well-Designed Buildings' although they would be unlikely to be achievable as the proposed towers and blocks cannot "respond positively to the character of the existing context" (Para a,i), nor make a "positive contribution" to the townscape (Para a,ii) as there is not much chance of any locations amongst the concrete and glass edifices being a townscape.
104	2143	Community Group	Del Brenner	Regents Network	Design	H8		The life and productivity of our canals is not just history, it is part of our heritage. It does not seem to be fully recognised, but the 'common' canal in West London is a considerable heritage item that should be given a great deal more attention, and should be featured in the OPDC Local Plan. The local Paddington Arm has the charm and attraction of a river, but more than that as it is a man-made structure that has been part of our community and everyday lives for decade after decade. This not just sentiment, it is a direct understanding of an important element of our lives and experience that guides us into the future. Attempts (by Regents Network and others) to get the nation's canal network recognised, and designated as a 'national monument' (all 3,000 miles of it) have so far failed. No other country has canals quite like our nation's canals, and such a network does not exist anywhere else in the world. A bit of flag waving would not go amiss.

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104	2145	Community Group	Del Brenner	Regents Network	Design	H8		Items of heritage that should be considered of interest are: The historic railway bridge over the canal at Old Oak Lane; · Cast iron canal milestone beside Old Oak Lane road bridge (there were many that are thought to be in store and should be reinstated); · The canal 'stop gates' at the water surface at Old Oak Lane, and in a very poor condition; · Parish boundary stones in the undergrowth beside the towpath near Mitre Bridge. · Cobbled horse ramps, with a good example at Mitre Bridge demolished and new steps built; · A historic footpath and right of way across the railway lines and what is now Powerday Wharf. · Canalside landing platforms with cast iron gates at Kensal Rise Cemetery, where coffins arrive by narrowboat for burial; · Remnants of wharves at the former power station at Acton Lane where coal boats unloaded; · A number of brick warehouses and factories alongside the GU Canal that have turned their backs on the canal, with a bit of care and renovation will provide worthwhile examples of past industry; · The aqueduct built in the 1930s when the new North Circular was constructed to skirt the urban suburbs, now enlarged to span the six-lane highway and well worth a visit to enjoy the peace and calm of the canal as it passes over the mayhem and gridlock of the A406; · The Great Wall built along the south side of the canal beside the North Pole Rail Depot and which is a very substantial retaining wall to support the canal when the hillside was cut away beside the waterway for the railways and sidings construction. · The mouth of the Brent Feeder just west of Acton Lane conveying water from the Brent Reservoir (the Welsh Harp that the canal company built) to supply the Regents Canal; · The last remaining section of the original 'soft' bank of the canal on the off side just west of Acton Lane where there never has been a canal wall constructed, or the concrete piling wall from the 1940-50s when the GU Canal was being upgraded to the 100 ton standard (the upgrading reached Berkhamstead on the canal mainline before the grants were withdrawn); · McVities Biscuits Factory built 1902 in Waxlow Road off Acton Lane and fronted on to the canal with a large green (conservation) open space (recently built on with warehouses!), and the factory still manufactures several million biscuits every day; · The memory of the extensive 50 acre 1925 Heinz factory at Abbey Road where raw materials were delivered by canal (brined vegetables from the docks in the photo), as well as live beef cattle transported from up country by barge and herded into the factory to become soup. In the 60s one million cans of baked beans were produced every day, although for economic reasons the factory closed in 2,000 and was demolished.
104	2176	Community Group	Del Brenner	Regents Network	Design		Figure 5.1	Figure 5.1: Gasholder Park, Kings Cross - precedent for delivering good growth by design and responding to local heritage A wonderful heritage structure in a very poor and ugly setting of nonsense buildings
104	2177	Community Group	Del Brenner	Regents Network	Design	D1	Figure 5.2	Figure 5.2: Tate Modern - precedent for delivering high quality design within a high density area The Tate construction shows up the tacky glass buildings on the left
104	2178	Community Group	Del Brenner	Regents Network	Design	D2	Figure 5.3	Figure 5.3: New Square at Elephant and Castle - precedent for delivering high quality public realm Potentially a fine space, unlike the bleak wasteland of Granary Square at Kings Cross
104	2179	Community Group	Del Brenner	Regents Network	Design	D3	Figure 5.4	Figure 5.4: Peter's Hill - precedent for delivering accessible and inclusive design as an integral part of the public realm An unsympathetic space that lacks good design input
104	2180	Community Group	Del Brenner	Regents Network	Design	D4	Figure 5.5	Figure 5.5: Trafalgar Place, Elephant and Castle - precedent for well-designed residential developments Tranquil and much better than the average, but lacks homeliness
104	2181	Community Group	Del Brenner	Regents Network	Design	D8	Figure 5.8	Figure 5.8: German Gymnasium, Kings Cross - precedent for conserving and enhancing heritage asset in large scale development Kings Cross is heritage disaster area - loss of the Culross and Stanley Buildings, and more
104	2182	Community Group	Del Brenner	Regents Network	Design	D8	Figure 5.9	Figure 5.9: The Eagle, Old Street - precedent for high density development responding to heritage The heritage is preserved but not celebrated by having a close-by dominating structure
106	2195	Local Resident	Catherine Sookha		Design			We are concerned at the projected high-density of the development, and request justification and evidence that the proposed density will result in a sustainable neighbourhood that will be attractive to Londoners. We need justification that existing residents can maintain their quality of life both throughout the construction period and once the new housing and business developments are in place.
106	2196	Local Resident	Catherine Sookha		Design	D5		We are particularly concerned at the omission of building heights, given that 3D models, presentation images, and conversations with OPDC staff and board members all point toward an ambition of building heights being 40 stories and up. We do not believe that there is sufficient justification for these heights in this area. In particular, we are concerned about the impact on the quality of life if the HS2 station overbuild, and the area which currently houses the Old Oak Common Depot, includes towers of this type of height. Wells House Road residents request justification as to why building heights of this kind are necessary so close to existing homes, when they will have a demonstrably negative impact upon quality of life, including: blocking out light from gardens, blocking views across London, and overshadowing a long-established low-rise community. As both HS2 and OPDC have described the Old Oak Common area as 'deprived', we ask OPDC to justify the further deprivation of our community that will be caused locally if the development of these high-rise tower blocks goes ahead as currently proposed.
106	2199	Local Resident	Catherine Sookha		Design			We also have concerns about OPDC's lack of commitment to quality of design, bearing in mind the inadequate quality of the bland Oaklands development, itself objected to by the local community. This sets a precedent for the area to become another Nine Elms or Canary Wharf – neither of which fulfil the needs of Londoners. We would expect distinctive, characterful building designs with different levels, attractive facades, green space and green walls.
106	2201	Local Resident	Catherine Sookha		Design	D6		Residents are concerned about the construction noise, air & light pollution and disruption that further adds to the burden of the next decade of HS2 constructions and means that Wells House Road residents will effectively be at the centre of a massive building site for 20-30 years.
106	2215	Local Resident	Catherine Sookha		Design	D8		We would also like to further protect our community by making Wells House Road a conservation area, and to be listed as one of the community assets. In fact, the entire shrunken area that OPDC proposes as the designated neighbourhood forum would be best served as a conservation area.

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106	2218	Local Resident	Catherine Sookha		Design			Overall, we do not wish this area to become an extension of unpopular North Acton, or to be like other unpopular developments such as Canary Wharf and Nine Elms. These areas demonstrate poor quality in terms of high density, lack of community, lack of green and open spaces, play spaces, provision of social infrastructure, provision of cultural and leisure needs (acknowledged to be in need in the Retail and Leisure needs study), and contribution to existing residents' housing needs. Student housing may come along with a very low expectation of social infrastructure, or provide this internally.
107	2233	Residents Association	Mark Walker	TITRA	Design	D5		TITRA doesn't think this draft Local Plan is clear over its intended building heights and densities and site allocations, so it does not comply with National Planning Practice Framework that requires all Local Plans to be clear and accessible. This lack of clarity occurs at various policies in the Plan.
107	2235	Residents Association	Mark Walker	TITRA	Design	D5	c)	TITRA objects to tall buildings Policy D5 because it never says what a 'tall building' is. Policy D5 c(ii) & c(iii) talk of "enhancing the skyline and increasing the identity of an area" but that our members need to know the basic assumptions behind these policies if they are to judge them.
107	2236	Residents Association	Mark Walker	TITRA	Design			TITRA objects to the lack of clarity over building heights that is applied across this plan.
109	2284	Local Resident	Lynette Hollender		Design			We are concerned at the projected high-density of the development, and request justification and evidence that the proposed density will result in a sustainable neighbourhood that will be attractive to Londoners. We need justification that existing residents can maintain their quality of life both throughout the construction period and once the new housing and business developments are in place.
109	2285	Local Resident	Lynette Hollender		Design	D5		We are particularly concerned at the omission of building heights, given that 3D models, presentation images, and conversations with OPDC staff and board members all point toward an ambition of building heights being 40 stories and up. We do not believe that there is sufficient justification for these heights in this area. It particular, we are concerned about the impact on the quality of life if the HS2 station overbuild, and the area which currently houses the Old Oak Common Depot, includes towers of this type of height. Wells House Road residents request justification as to why building heights of this kind are necessary so close to existing homes, when they will have a demonstrably negative impact upon quality of life, including: blocking out light from gardens, blocking views across London, and overshadowing a long-established low-rise community. As both HS2 and OPDC have described the Old Oak Common area as 'deprived', we ask OPDC to justify the further deprivation of our community that will be caused locally if the development of these high-rise tower blocks goes ahead as currently proposed.
109	2288	Local Resident	Lynette Hollender		Design			We also have concerns about OPDC's lack of commitment to quality of design, bearing in mind the inadequate quality of the bland Oaklands development, itself objected to by the local community. This sets a precedent for the area to become another Nine Elms or Canary Wharf – neither of which fulfil the needs of Londoners. We would expect distinctive, characterful building designs with different levels, attractive facades, green space and green walls.
109	2290	Local Resident	Lynette Hollender		Design	D6		Residents are concerned about the construction noise, air & light pollution and disruption that further adds to the burden of the next decade of HS2 constructions and means that Wells House Road residents will effectively be at the centre of a massive building site for 20-30 years.
109	2304	Local Resident	Lynette Hollender		Design	D8		We would also like to further protect our community by making Wells House Road a conservation area, and to be listed as one of the community assets. In fact, the entire shrunken area that OPDC proposes as the designated neighbourhood forum would be best served as a conservation area.
110	2344	Community Group	Sharon Hayward	Grand Union Alliance	Design	D1		Policy D1 fails to provide a strong overall development management policy relating to achieving high quality liveable and inclusive sustainable Lifetime Neighbourhoods that are accessible to people of all ages, ability/disability and incomes. This is required to provide development management policy to achieve aspirations of SP2 and SP4 – see also NPPF paras 69-70 on facilitating social interaction and creating healthy, inclusive communities.
110	2345	Community Group	Sharon Hayward	Grand Union Alliance	Design	D1		How would the OPDC measure whether high quality design is achieved or not? Policy D1 (a) ii refers to the OPDC's Place Review Group – but it's not clear what criteria they are working to. The Group is constituted by the Design Council, thus reflecting only one professional and institutional point of view whilst a wider membership including community and other stakeholders would provide more provide essential diversity of views.
110	2346	Community Group	Sharon Hayward	Grand Union Alliance	Design	D1		Regarding D1 (b) ii and iv, there needs to be some clarification about precisely what these means in order that members of the public might genuinely influence at an early stage - see NPPF para 66. (See also response to Policy D4 below).
110	2347	Community Group	Sharon Hayward	Grand Union Alliance	Design	D1		• the policy name be changed to Securing High Quality Design and Lifetime Neighbourhoods;
110	2348	Community Group	Sharon Hayward	Grand Union Alliance	Design	D1		• the first sentence of the policy should be amended to 'OPDC will support development proposals where they demonstrate a high quality and comprehensive design process and positively deliver or contribute to delivering lifetime neighbourhoods. To achieve this:;
110	2349	Community Group	Sharon Hayward	Grand Union Alliance	Design	D1		• add in a new point (a) All development proposal should help to create (i) neighbourhoods that have a sense of community ownership and security where children and older people, abled and disabled can feel safe (ii) adequate community orientated facilities and meeting places to support engaged and empowered communities (iii) adaptable and imaginative buildings that are designed to last for 150 years and use best materials and techniques in terms of sustainability (iv) neighbourhoods that are inclusive, human and beautiful, providing for whole communities with spiritual makers, facilitators and educators at their heart, then amend the following to (b), (c) and (d)
110	2350	Community Group	Sharon Hayward	Grand Union Alliance	Design	D1		• add (a iv) support the OPDC 'framework of principles' for high quality design. This framework should be drawn up based on 'building for life' and be included in a table in supporting text
110	2351	Community Group	Sharon Hayward	Grand Union Alliance	Design	D1		• the OPDC Place Review Group should include community members that are 'experts' in respect of their understanding of the area and their community;

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110	2352	Community Group	Sharon Hayward	Grand Union Alliance	Design	D1		• specify more precisely in relation to D1(a) what 'relevant and appropriate' means
110	2353	Community Group	Sharon Hayward	Grand Union Alliance	Design	D2		This Policy is not effective. Despite being largely the product of recent and continuing developments that the draft Local Plan seemingly supports, North Acton has a deteriorating, poor quality and discordant public realm. This area sets a most unfortunate and unacceptable precedent for the rest of development within the OPDC and undermines the credibility of this Policy. And this implementation flies in the face of NPPF para 58 which includes a principle of seeking to establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.
110	2354	Community Group	Sharon Hayward	Grand Union Alliance	Design	D2		Upgrading large areas, especially Park Royal, would be dependent on development-led projects. This would not secure the necessary scale of much needed improvement of the public realm. A positively planned proactive programme of proposals for public realm improvement should be prepared to support this Policy.
110	2355	Community Group	Sharon Hayward	Grand Union Alliance	Design	D2		Note that there is a need for lunchtime spaces, particularly in Park Royal and that the public realm for the Canal, towpaths and adjoining areas needs particular attention.
110	2356	Community Group	Sharon Hayward	Grand Union Alliance	Design	D2		Proposals for the activation or animation of the public realm can include markets, exhibition pavilions, performance space – informal and organised. Incorporating informal play opportunities for younger children within the public realm, as with 'play fountains', climbing obstacles etc., and for adults, urban street obstacle courses for workouts; nevertheless remember the aged with seating and low impact outdoor gyms. (This is also included in the response to Policy D9 Play Space).
110	2357	Community Group	Sharon Hayward	Grand Union Alliance	Design	D2		On 'publicly accessible spaces' see Guardian article "Revealed: the insidious creep of pseudo-public space in London": https://www.theguardian.com/cities/2017/jul/24/revealed-pseudo-public-space-pops-london-investigation-map .
110	2358	Community Group	Sharon Hayward	Grand Union Alliance	Design	D2		Still relevant from Regulation 18 response: A commitment to separating walking, cycling (to protect children, elderly and disabled people), private, and public vehicles in all streets and public realms should be included. This is also repeated for responses to Policies T2 Walking and T3 Cycling.
110	2359	Community Group	Sharon Hayward	Grand Union Alliance	Design	D2		Still relevant from Regulation 18 response: Permeability and legibility need to be balanced with creating enclosing neighbourhoods where children, disabled and older people can feel safe; where adequate community-oriented facilities and meeting places are provided.
110	2360	Community Group	Sharon Hayward	Grand Union Alliance	Design	D2		Still relevant from Regulation 18 response: Street design needs to sensitively support a balance in the provision of local services and retail, with those dedicated to the potentially lucrative activities to service high footfalls.
110	2361	Community Group	Sharon Hayward	Grand Union Alliance	Design	D2		Still relevant from Regulation 18 response: Develop a strategy for high quality accessible and inclusive hard and soft landscaping throughout the OPDC area.
110	2362	Community Group	Sharon Hayward	Grand Union Alliance	Design	D2		Still relevant from Regulation 18 response: Better connections are required both within the OPDC Area and with neighbouring communities to contribute sensitively to connecting places within and immediately neighbouring the OPDC area and creating new public realm.
110	2363	Community Group	Sharon Hayward	Grand Union Alliance	Design	D3		The policy is not effective. The following additional points should be added to the policy • recognise and are inclusive of the different needs of different ages of members of the community
110	2364	Community Group	Sharon Hayward	Grand Union Alliance	Design	D3		The following additional points should be added to the policy • accessible to people regardless of income
110	2365	Community Group	Sharon Hayward	Grand Union Alliance	Design	D3		The following additional points should be added to the policy • are flexible and adaptable to meet changing needs (including over individuals' lifetimes)
110	2366	Community Group	Sharon Hayward	Grand Union Alliance	Design	D4		The policy is not effective. This Policy should reflect the intent of NPPF para 66 that applicants should evolve designs that take account of the views of the community.
110	2367	Community Group	Sharon Hayward	Grand Union Alliance	Design	D1		Note that Policy D1 (b) iv is limited to major and strategic developments on proactive engagement with the community and potential end users in line with the OPDC's SCI. However, NPPF para 57 refers to the achievement of high quality and inclusive design for all development, ...
110	2368	Community Group	Sharon Hayward	Grand Union Alliance	Design	D4		Policy D4 (b) (i) refers to the use of roofs for play space. Paragraph 5.35 explores the potential use of roofs. The promotion of roofs as play space is at odds with the Mayor's SPG on Play Space (see also comments on Policy D9 below). This should not be set as an aspirational policy and should be deleted from this policy. Roofs might exceptionally be set as (additional) play space but it is a very poor planning policy to routinely consign children to play on roofs. Related functions expected to be placed on roofs e.g. elements of heating and other services, are not a good fit with play space and potentially place these sites at odds with EU4 Air Quality and Policy D9 (b) (iv).
110	2369	Community Group	Sharon Hayward	Grand Union Alliance	Design	D5		The London Plan 7.7 requires that boroughs (planning authorities) to work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their LDFs and be consistent with the rest of the policy. There is mention in the OPDC's Environmental Standards Study of building heights typically varying between 20 and 60 storeys and of hyper densities being proposed in clusters of 350-600 dwellings per hectare. However, there is no mention in Policy D5 of what building heights might be expected and where. There is no precise mapping in the plan of where different heights of building are intended, in order to enable informed discussion / consultation. The NPPF para 58 expects robust and comprehensive policies that set out the quality of development that will be expected for the area, and para 59 asks that design policies should concentrate on guiding the overall scale, density, massing, height... of new development in relation to neighbouring buildings and the local area more generally. Policy D5 is deficient in these respects.

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110	2370	Community Group	Sharon Hayward	Grand Union Alliance	Design			Opportunity Areas have a plan-led approach that allows tall buildings and higher densities to be achieved if they satisfy other criteria set out in London Plan policy 7.7 The Environmental Standards Study identifies the building heights and densities proposed as an unprecedented scale and form of area-wide urban development in London. The result of this will be like slotting one of the extremes of the Central Activity Zone into an outer London area, which the majority view as particularly insensitive and inappropriate. It would not support Cb and Cc of policy 7.7 of the London Plan and will create a physical separation between the OPDC area and surrounding neighbourhoods rather than creating sensitive routes, links and connections.
110	2371	Community Group	Sharon Hayward	Grand Union Alliance	Design			The regulation 18 Local Plan talked about sensitivity to the existing surrounding areas and neighbourhoods and the need to have gradation from neighbouring areas with low rise housing to higher buildings. However, this seems to have been dismissed, as is exemplified by planning applications that have recently been agreed on Scrubs Lane. Here, justifications given by the plan for high buildings do not reflect design or policy-led criteria, but the demanding financial, infrastructural and housing targets set by the untested overall quantum of development set for the OPDC area in the London Plan. Thus, the Table in P10 outlines the rationale for one tall building on each site as being to provide legibility (explained elsewhere as marking the edges of the OPDC area and supporting wayfinding) and to secure additional benefits. We suggest that the design and planning arguments are spurious, and were reversed from Reg 18 to Reg 19 versions. The provision of higher quantum of housing, and the extraction of developer contributions (“secure additional benefits”) provides the overriding justification which does not meet design and other criteria. Indeed, this would seem to be an example of policy being made in response to developers’ needs and the creation of a development pipeline of numbers of homes up rather than solid and sound plan making (including delivery of both good place-making and mixed and balanced communities). Note analysis of housing types in developments that have been agreed in response to policy H2 affordable housing.
110	2372	Community Group	Sharon Hayward	Grand Union Alliance	Design			Densities and building heights in Old Oak North and Scrubs Lane Places draw on the proposed Hythe Road Station to support high PTALS which are said to justify highest densities/tallest building heights. This should not be part of the justification/evidence base until there is TfL commitment to funding the station.
110	2373	Community Group	Sharon Hayward	Grand Union Alliance	Design			The other area of concern is the increasing number of high rise buildings at North Acton – adding to those already developed prior to the setting up of the OPDC. Not only is this an area that is in complete contrast to neighbouring low-rise buildings – with no sensitivity and no gradation towards higher buildings, in addition, these contain pretty much mono-tenure housing for students or single person households. This has added pressure on exiting social infrastructure particularly health facilities and development of shops and services that does not meet wider needs.
110	2374	Community Group	Sharon Hayward	Grand Union Alliance	Design			GUA members concern raised previously in response to the regulation 18 consultation are that • high-rise blocks, which seem to be synonymous with luxury development, could also be left empty for much of the time – with apartments used more like a hotel than homes. This is not conducive to developing sustainable and lifetime neighbourhoods. The property market at the high end is also collapsing and alongside Brexit there greater uncertainty in terms of the strategy for the development;
110	2375	Community Group	Sharon Hayward	Grand Union Alliance	Design			GUA members concern raised previously in response to the regulation 18 consultation are that • management and maintenance costs are significantly higher in high-rise buildings which may militate against delivery of low cost rented housing;
110	2376	Community Group	Sharon Hayward	Grand Union Alliance	Design			GUA members concern raised previously in response to the regulation 18 consultation are that • the OPDC should look at past, including international, examples of optimising density without having to develop high-rise buildings. This has not occurred and instead the Environmental Standards Study provides examples of International Best Practice in terms of delivering high-rise buildings. It is questionable as to whether it is appropriate in anyway shape or form to take Singapore as a good example to be applied in this part of London.
110	2377	Community Group	Sharon Hayward	Grand Union Alliance	Design			• caution must be taken until the results of the Public Inquiry into the Grenfell fire disaster in accepting any new proposals for tall buildings. They note with concern that the proposals so far approved for towers at Mitre Yard and North Kensington Gate (each approximately 20 storeys) have been designed with single stair access. • it is notable that in the light on the Grenfell Tower tragedy even engineering academics from the National University of Singapore’s civil and environmental engineering department are noting that modern high-rise are being built in more complex ways which introduce fire risk that need to be assessed. “For example, the concave structure is currently typical of building facades in architectural design, but it increases the flame spread rate increases,” he explained. “In addition, window glass facades, as the weakest part of a building, may break easily when subject to a fire, significantly accelerating fire spread.” http://www.channelnewsasia.com/news/singapore/guarding-against-a-grenfell-like-disaster-in-singapore-8985482 GUA members are necessarily concerned that the OPDC has insufficient evidence and costings relating to addressing issues such as fire risk in addition to other challenges listed above. The Environmental Standards Study is silent in respect of fire risk. This could further challenge the viability of the development of the OPDC area;
110	2378	Community Group	Sharon Hayward	Grand Union Alliance	Design			• as highlighted in the Environmental Standards Study the “unprecedented densities and associated tall buildings within Old Oak will make also make both energy demand reduction and ultra-low carbon onsite energy generation additionally challenging”;
110	2379	Community Group	Sharon Hayward	Grand Union Alliance	Design			• issues relating to safety and security have been raised – including risk of items being dropped from windows or balconies and the impact of this have not been considered in policy terms;

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110	2380	Community Group	Sharon Hayward	Grand Union Alliance	Design			The OPDC must provide: • mapping of where tall buildings will be considered appropriate and at what heights, in the OPDC area, particularly since the GUA asked the OPDC to provide exact assessments of building heights and density levels across the OPDC area in its response to the regulation 18 Local Plan
110	2381	Community Group	Sharon Hayward	Grand Union Alliance	Design			The OPDC must provide: • evidence that it has considered fire risk and related costs
110	2382	Community Group	Sharon Hayward	Grand Union Alliance	Design			The OPDC must provide: • considered alternatives to delivering high-rise building heights proposed in the Environmental Standards Study;
110	2383	Community Group	Sharon Hayward	Grand Union Alliance	Design			The OPDC must provide: • evidence that it has considered all the additional costs and challenges relating to such high-rise development;
110	2384	Community Group	Sharon Hayward	Grand Union Alliance	Design			The OPDC must provide: • appropriately produce policy and determine planning applications in a way that conforms to London Plan policy 7.7 and sensitively provide positive routes, links and connections to surrounding neighbourhoods rather than what is currently considered to be negative by many community members involved with the GUA.
110	2385	Community Group	Sharon Hayward	Grand Union Alliance	Design	D8		This Policy is not effective. We welcome the surveying and recording of heritage assets and areas that has informed the depiction of a variety of protected features and proposals on the Policies Map.
110	2386	Community Group	Sharon Hayward	Grand Union Alliance	Design	D8		However, Wells House Road estate has a relatively undiminished unity and character, together with a planned origin, that merits it recognition as part of the 'historic residential enclaves' OPDC Heritage Themes and its designation as a proposed Conservation Area rather than an Area of Local Character. (Policy P8 would also need to amended accordingly).
110	2387	Community Group	Sharon Hayward	Grand Union Alliance	Design	D8		Still relevant from GUA's collaborative Regulation 18 response are: to assist the conserving, enhancing and celebrating the historic significance of the area, by proposals contributing to respecting and celebrating the proud (industrial) history of the area as a starting point for new development and contribute to successful place-making; together with 'memorialising' the local vernacular industrial and social heritage; and promoting community ownership of strategies and places (including a canal-side hub) on the history and culture of the area. NPPF para 58 has a principle of responding to local character and history.
110	2388	Community Group	Sharon Hayward	Grand Union Alliance	Design	D9		This Policy is not effective. The Policy is prefaced with, "where relevant and appropriate", and yet it speaks to legal requirements relevant to core health issues. Point b) (iv) requires play spaces to be located away from pollution. Close attention in this regard needs to be paid to related policy EU4 Air Quality, paragraph 6.55 which requires public and open space, as well as communal amenity space to avoid polluted areas. This is especially important for young and older vulnerable residents. This policy should be cross-referenced here. It should be entirely clear in the plan that this policy is not optional.
110	2389	Community Group	Sharon Hayward	Grand Union Alliance	Design	D9		We welcome the specific attention to (younger) child play space in this Policy, but planning for the needs of other age groups warrants comparable recognition and elaboration. Younger teenagers seek 'hangout spaces' as well as space/facilities for both organised and informal activities and sport, including kick about areas, skate-park, BMX track, off-road cycling, basketball, adventure-park etc. These may require larger spaces to enable "adventurous" and boisterous play including team games.
110	2390	Community Group	Sharon Hayward	Grand Union Alliance	Design	D9		There is the opportunity to consider intergenerational facilities given the health and well-being driver to remain active throughout life as related in Policy SP 3 Improving Health and Reducing Health Inequalities. (Note that whilst text para 3.21 states that Policy SP8 Green Infrastructure and Open Spaces supports active play for all ages, this is not actually specifically referenced in Policy SP8. Propose that this Policy SP8 be amended accordingly).
110	2391	Community Group	Sharon Hayward	Grand Union Alliance	Design	D9		In OPDC planning determinations to date open spaces are provided communally and not in publicly accessible spaces; and children's play spaces are located on rooftops and terraces, balconies and courtyards with minimum levels of sunlight. This does not reflect the OPDC overall vision of "international excellence in sustainability, health and wellbeing and design quality". There are many aspects of successful play space outlined in the Mayor's SPG on Play Space which cannot be provided on roofs and balconies: that they might provide opportunities to "watch the world go by", that they would be usually overlooked so as not to become sites of anti-social behavior, that children would feel legitimate parts of society and public space, and places where children with disabilities will feel safe and secure (for example, p. 39). It is our view that a much more aspirational view of play spaces should be reflected in this plan, or the OPDC area will become known for setting new low standards for children's life in London.
110	2392	Community Group	Sharon Hayward	Grand Union Alliance	Design	D9		Relevant from the response to Policy D2 Public Realm: Incorporate informal play opportunities for younger children within the public realm, as with 'play fountains', climbing obstacles etc., and for adults, urban street obstacle courses for workouts; nevertheless, remember the aged with seating and low impact outdoor gyms.
111	2660	Local Resident	Jeremy Aspinall		Design			We are concerned at the projected high-density of the development, and request justification and evidence that the proposed density will result in a sustainable neighbourhood that will be attractive to Londoners. We need justification that existing residents can maintain their quality of life both throughout the construction period and once the new housing and business developments are in place.
111	2661	Local Resident	Jeremy Aspinall		Design	D5		We are particularly concerned at the omission of building heights, given that 3D models, presentation images, and conversations with OPDC staff and board members all point toward an ambition of building heights being 40 stories and up. We do not believe that there is sufficient justification for these heights in this area. It particular, we are concerned about the impact on the quality of life if the HS2 station overbuild, and the area which currently houses the Old Oak Common Depot, includes towers of this type of height. Wells House Road residents request justification as to why building heights of this kind are necessary so close to existing homes, when they will have a demonstrably negative impact upon quality of life, including: blocking out light from gardens, blocking views across London, and overshadowing a long-established low-rise community. As both HS2 and OPDC have described the Old Oak Common area as 'deprived',

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								we ask OPDC to justify the further deprivation of our community that will be caused locally if the development of these high-rise tower blocks goes ahead as currently proposed.
111	2664	Local Resident	Jeremy Aspinall		Design			We also have concerns about OPDC's lack of commitment to quality of design, bearing in mind the inadequate quality of the bland Oaklands development, itself objected to by the local community. This sets a precedent for the area to become another Nine Elms or Canary Wharf – neither of which fulfil the needs of Londoners. We would expect distinctive, characterful building designs with different levels, attractive facades, green space and green walls.
111	2666	Local Resident	Jeremy Aspinall		Design	D6		Residents are concerned about the construction noise, air & light pollution and disruption that further adds to the burden of the next decade of HS2 constructions and means that Wells House Road residents will effectively be at the centre of a massive building site for 20-30 years.
111	2680	Local Resident	Jeremy Aspinall		Design	D8		We would also like to further protect our community by making Wells House Road a conservation area, and to be listed as one of the community assets. In fact, the entire shrunken area that OPDC proposes as the designated neighbourhood forum would be best served as a conservation area.
112	2684	Local Resident	Bini Ghebreyesus		Design	D9		A. Children are spending more hours in front of screens/gadgets and we are witnessing heavier children than usual!!! Obesity in children is a serious problem. Research shows that children often do not get the required amount of exercise to maintain a healthy lifestyle. They are getting less active and less fit than they were even five/ten/fifteen years ago. Studies have also shown that less active children are more likely to be overweight, and overweight children have a greater propensity to become overweight adults that are more likely to develop serious health problems later in life, such as diabetes, heart disease and even cancer. Children need balanced diet that gives them energy but also need a play area to grow and develop healthy. Parental concern for the physical well-being of children has also created a need for a safe play environment. This concern shows no sign of diminishing. Brent and Ealing are already in the top six London boroughs with high birth rate. Building tens of thousands new homes in OPDC and its surrounding areas will bring new population that will be looking for places where their young children play safely and develop. Currently, virtually no safe play area(s) for children between the age of 3 months to 12 years in the OPDC area. It is a no brainer to prioritise and invest in the future generation. Children need enough physical exercise from the early stages of their lives and play is the way they explore their surrounding and get to understand it.
112	2685	Local Resident	Bini Ghebreyesus		Design			B. On the other end of the age group are our senior citizens, who are not active enough and most of the time are lonely. We need more age inclusive facilities so that our seniors are able to continue to enjoy the community they live in while passing their knowledge on to the next generation. The fact that people live longer than ever is something that should be celebrated. A perfect opportunity to create intergenerational project in the OPDC area !
113	2690	Local Resident	Thomas Dyton		Design			We are concerned at the projected high-density of the development, and request justification and evidence that the proposed density will result in a sustainable neighbourhood that will be attractive to Londoners. We need justification that existing residents can maintain their quality of life both throughout the construction period and once the new housing and business developments are in place.
113	2691	Local Resident	Thomas Dyton		Design	D5		We are particularly concerned at the omission of building heights, given that 3D models, presentation images, and conversations with OPDC staff and board members all point toward an ambition of building heights being 40 stories and up. We do not believe that there is sufficient justification for these heights in this area. It particular, we are concerned about the impact on the quality of life if the HS2 station overbuild, and the area which currently houses the Old Oak Common Depot, includes towers of this type of height. Wells House Road residents request justification as to why building heights of this kind are necessary so close to existing homes, when they will have a demonstrably negative impact upon quality of life, including: blocking out light from gardens, blocking views across London, and overshadowing a long-established low-rise community. As both HS2 and OPDC have described the Old Oak Common area as 'deprived', we ask OPDC to justify the further deprivation of our community that will be caused locally if the development of these high-rise tower blocks goes ahead as currently proposed.
113	2694	Local Resident	Thomas Dyton		Design			We also have concerns about OPDC's lack of commitment to quality of design, bearing in mind the inadequate quality of the bland Oaklands development, itself objected to by the local community. This sets a precedent for the area to become another Nine Elms or Canary Wharf – neither of which fulfil the needs of Londoners. We would expect distinctive, characterful building designs with different levels, attractive facades, green space and green walls.
113	2696	Local Resident	Thomas Dyton		Design	D6		Residents are concerned about the construction noise, air & light pollution and disruption that further adds to the burden of the next decade of HS2 constructions and means that Wells House Road residents will effectively be at the centre of a massive building site for 20-30 years.
113	2710	Local Resident	Thomas Dyton		Design	D8		We would also like to further protect our community by making Wells House Road a conservation area, and to be listed as one of the community assets. In fact, the entire shrunken area that OPDC proposes as the designated neighbourhood forum would be best served as a conservation area.
114	2729	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Design	D5		We do not see in this draft that Local Plan is clear over its intended building heights and densities, so it does not comply with National Planning Practice Framework (Paragraph: 010 Reference ID: 12-010-20140306) that requires all Local Plans to be “as focused, concise and accessible as possible.”
114	2731	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Design	D5	c)	We object to tall buildings Policy D5 because it never says what a ‘tall building’ actually is. Policy D5 c(ii) & c(iii) talk of “enhancing the skyline and increasing the identity of an area” but that is effectively meaningless. It requires clarity over basic assumptions on heights in this policy to enable any judgement.
114	2732	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Design			We object to the lack of clarity over building heights that is applied to each chapter of this plan.
115	2769	Local Resident	Nye Jones		Design	D5		TITRA wants this draft Local Plan to be much clearer over its intended building heights and densities - if it doesn't do this, it's not following National Planning Guidelines. Although the plan talks about “a variety of building heights, a range of building heights, and to taller or tallbuildings” they aren't outlined in

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								Policies SP2 or SP4, nor in Policy SP9 on the Built Environment. TITRA objects to tall buildings Policy D5 because it never says what a 'tall building' actually is, so people can't judge if the thinking behind plans for them is sound.
115	2771	Local Resident	Nye Jones		Design			The draft Local Plan is not clear about housing densities, with "indicative" housing densities of 300-600 units/hectare buried in its separate Development Capacity Study.

Environment and Utilities

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6	10	Local Resident	Robert Covell		Environment and Utilities	EU4		3. 25,500 new homes plus new business and schools, but no mention of the strategies to reduce rather than increase pollution, which is already an issue in the area. You will no doubt refer to new public transport links, but it would be naive and negligent to not point out that this much new development and people coming to and from the area, and living there, will increase private transport use. You must have a pollution reduction agenda.
7	11	Local Resident	Adrien Lafond		Environment and Utilities	EU4		Hi there, Just wanted to add my stone by bringing up the need to tackle the indoor air pollution challenge eg inside homes and buildings.
12	40	Statutory Consultee	Liz Goodwin OBE	LWARB	Environment and Utilities	EU7		The London Waste and Recycling Board (LWARB) is a statutory Board established by the GLA Act 2007 to provide a strategic approach to waste management in London. The Board is chaired by the Mayor of London (or his representative). As well as the Chair, the membership comprises four councillors and two independents nominated by London Councils and one independent appointed by the Mayor of London. LWARB delivers three key programmes: • Resource London is a programme of support for London Local Waste Authorities jointly funded by LWARB and WRAP. • Advance London is an investment programme to support SMEs to capitalise on the benefits of the circular economy. • Circular London is a programme that aims to create the right conditions for a circular economy to flourish in London Studies have illustrated the circular economy could provide London with net benefits of at least £7bn every year in the sectors of built environment, food, textiles, electricals and plastics, as well as 12,000 net new jobs in the areas of re-use, remanufacturing and materials innovation by 2036. In June 2017 LWARB published the Circular Economy Route Map for London which sets out a series of recommended actions for LWARB and its stakeholders which will accelerate London's transition towards a circular economy. LWARB is strongly supportive of the inclusion of a chapter devoted to the Circular Economy within the OPDC Local Plan, and the embedding of recommendations from the Arup Circular and Sharing economy study (ref here) for ODPC throughout the Local Plan. Planning will be an essential element in allowing London to benefit from a circular economy, and in delivering the Mayor's vision of Good Growth for London. The circular economy allows for a more sustainable approach to land-use planning, and there are already several examples where circular economy is benefitting new development. The Park 2020 business park in Amsterdam is being developed using circular economy principles including 4 key themes: design for disassembly, products as services, materials banking and productivity and health. This has resulted in a highly attractive built environment designed to increase productivity and job satisfaction. The site has closed loop water and energy systems, includes food businesses which use food grown onsite, has been built for future disassembly and incorporates asset tracking for future reuse meaning the developer is able to generate a higher value from the asset over its lifetime .
12	42	Statutory Consultee	Liz Goodwin OBE	LWARB	Environment and Utilities	EU7		LWARB is pleased to see the inclusion of the requirement for all developers to create a Circular and Sharing Economy Statement as part of the planning process. The creation of the statement will help to ensure opportunities such as reuse of materials from deconstruction, materials banking, urban food growth, and space/logistics sharing are identified from the very beginning of the planning process. We hope the example being set by OPDC will be shared amongst other opportunity areas, and Local Authorities and used as an example of how circular economy can be embedded within local planning. We would welcome the opportunity to support the OPDC to create a Circular Economy SPG for this Local Plan to help provide more specific guidance for planners and developers. We would also support the use of the guidance provided by OPDC in this document, and any future related SPG's for this opportunity area to be used as the starting point for a Circular Economy SPG to accompany the new London Plan once it is published.
12	43	Statutory Consultee	Liz Goodwin OBE	LWARB	Environment and Utilities	EU7		LWARB supports the vision within this draft that the area will be an exemplar in healthy and sustainable large-scale development. We also support the recognition that the circular economy offers an opportunity for Park Royal to continue to be a successful industrial area through linking products and services used in Oak Park with businesses in Park Royal for recycling and repurposing. Further examples of how this could be shaped at the sites are provided in the Circular Economy Study for Old Oak and Park Royal report . This includes a potential scenario (called the Royal Garden Scenario) whereby the use of urban gardening on rooftops, green walls, and other underutilised space, alongside utilising new innovations such as aquaponics can be used to supply local food businesses, and food waste can be fed into anaerobic digesters (AD) to produce biogas and organic fertiliser for use on the site. Such small scale AD plants already exist. The Riverside AD Facility is located within the Willow Lane Industrial Estate in Mitcham, Surrey, became operational in 2015. It covers 0.87 Hectares and can process up to 77,500 tonnes of food waste per annum. We support the need for flexible, adaptable design to allow future innovation to be incorporated to the site. Designing for flexibility reduces wasted time, effort and materials traditionally associated with building use transitions and expands the range of possible users of a building. For example Darwin Court in Southwark was designed specifically to respond to the changing needs of local community groups and older people. All flats were designed to be easily converted if/when the future needs of the tenant changed and allowed the flats to be adapted for both non-disabled and disabled tenants and accommodation of business activities within the building. For this reason, Darwin Court was designed to the Lifetime Homes Standard. For these reasons we would also suggest the concepts of designing for flexibility and disassembly are referenced in the 'well designed buildings' chapter. We agree with the recognition within the document that new innovations which support the circular economy such as urban analytics, and additive manufacturing will begin to change the needs of industrial spaces and increase the need for flexible design. Phased space planning can be used to enable circular economy opportunities to flourish and we would encourage the inclusion within the Local Plan for meanwhile spaces to be dedicated to circular economy business activities such as storage of demolition materials for reuse. As this has been highlighted as a significant barrier to increased reuse within the construction industry.
12	45	Statutory Consultee	Liz Goodwin OBE	LWARB	Environment and Utilities	EU6		LWARB is pleased to see the inclusion of reference to the LWARB guidance on recycling and storage of waste in policy EU6, The Resource London team at LWARB is actively working with OPDC to champion this guidance in new developments within the opportunity area. We also

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								welcome the inclusion in this policy for an optimised approach to the reuse of waste, reuse and/recycling of 95% construction, demolition and excavation waste, and the provision of appropriate details to occupants to engage residents in waste management.
12	46	Statutory Consultee	Liz Goodwin OBE	LWARB	Environment and Utilities	EU8		LWARB supports the inclusion of a sustainable materials chapter within the plan, and the policy for a minimum of 20% of the total material value of new buildings, infrastructure and landscape works to be derive from reused or recycled content. We would encourage rewording of the target to clarify that the target is for a minimum of 20% of total material value for each of the three types of works rather than the total material value of all three types combined.
12	49	Statutory Consultee	Liz Goodwin OBE	LWARB	Environment and Utilities	EU12		Whilst LWARB understands that some extraction of materials may be essential for London to deliver local materials needed across many supply chains, any judgement on applications for extraction should consider that extraction of new raw materials in the area does not fit with the model of good growth and the principles of circular economy in the long term.
15	72	Agent	Mark Underwood	Deloitte LLP (on behalf of Diageo)	Environment and Utilities	EU1		Diageo proposes that the wording of Policy EU1 is amended to justify the loss of underutilised open space.
17	119	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Environment and Utilities	EU3		The Trust welcomes the reference in Policy EU3 to the opportunity to provide surface water outfalls into the Grand Union Canal, subject to our agreement. We are supportive of this in principle but will need to undertake modelling as development proposals are worked up to identify the capacity of the waterway and any works needed to our infrastructure to allow water to be discharged. We consider that the canal should be seen as part of the wider development sites adjacent to it (particularly the Old Oak North / Cargiant Site) and viewed as part of the strategic SUDS rather than secondary to them in the hierarchy in policy EU3. This should provide a more effective management solution, with more opportunities to mitigate the impacts of water drained into he canal, than attenuation in separate SUDS that is then passed off into more natural streams or rivers.
17	120	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Environment and Utilities	EU4		New development along both sides of the canal could lead to a canyoning effect similar to that which policy EU4 seeks to avoid for streets. We suggest that, in accordance with the support for enhancing the environmental quality of the canal corridor in policy P3, the waterspace strategy for the OPDC area should address this matter. We suggest that it should support and consider opportunities to provide electricity connections that would allow boaters to power their internal systems and heating in this way rather than run engines or use wood burners in heavily built up areas.
17	121	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Environment and Utilities	EU10		The Trust estimates that the thermal energy within this section of the Grand Union Canal could be utilised to provide heating and cooling for up to 1500 new homes. We welcome the support for its use for heating in paragraphs GUC.18 and 6.111 of the OPDC Local Plan. We welcome the fact that secondary heat sources, of which canal water would be one, are identified as the sequentially preferable heat solution in policy EU10. We would suggest that policy EU10 would be stronger if it explicitly required applicants to submit a feasibility assessment that considered all options in accordance with the hierarchy outlined in the policy. We note that paragraph GUC.18 notes the potential for the Grand Union Canal to play a role in cooling new developments. We suggest that this should also be reflected in policy EU9 or its supporting text.
26	210	Strategic Partner	Archie Onslow	North London Waste Plan	Environment and Utilities	EU7		The boroughs fully support policy EU7 Circular and Sharing economy. This is a bold and imaginative policy to incorporate circular economy principles into development in the OPDC area. CD&E waste is the largest waste stream in London and these policies have great potential to reduce that.
26	211	Strategic Partner	Archie Onslow	North London Waste Plan	Environment and Utilities	EU6		In EU6 Waste we consider there are major flaws in the evidence base behind the policy and that as a result the OPDC is failing to meet the London Plan requirement, that where an Mayoral Development Corporation exists within a borough, the MDC will co-operate with the Borough to ensure that their apportionment requirements are met.
26	214	Strategic Partner	Archie Onslow	North London Waste Plan	Environment and Utilities	EU6	c)	A further consequence of this is that OPDC need to clarify at EU6c) how to determine the maximum throughput that the site could achieve where compensatory provision is required following loss of a waste site. The implication of the Apportionment Study is that this should be related to the licenced capacity. As noted above this would give unrealistic figures for almost all facilities. Instead the plan should focus on the maximum throughput achieved over a five year period.
27	226	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Environment and Utilities	EU1		The policy should avoid being too prescriptive otherwise it undermines and limits opportunities to deliver open space that may not fulfill all criteria but can nonetheless be beneficial.
27	227	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Environment and Utilities	EU1	d)	The policy should clarify not all open spaces are expected to achieve the full list of functions.
27	228	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Environment and Utilities	EU8		The policy should recognise that sustainability considerations may need to take in to account site specific conditions and development viability, as these will impact on the material selection and suitability.
27	229	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Environment and Utilities	EU10	c)	The hierarchy in the policy will need to take in to account site specific circumstances, feasibility and development viability to enable development pressures to be balanced.
30	323	Local Authority	Steve Barton	London Borough of Ealing	Environment and Utilities	EU6		The reference in policy EU6 to upholding policies in the WLWP is welcome and supported, including specifically the safeguarding of existing sites.
30	324	Local Authority	Steve Barton	London Borough of Ealing	Environment and Utilities	EU6		As currently drafted the policy and supporting text essentially take their reference from the current London Plan and the apportionment targets contained within this. Whilst this approach might suffice at present, it is short-sighted given the emergence of a new London Plan containing new apportionment targets.

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								As you will be aware the methodology for determining apportionment is currently being revised, and whilst the GLA have shared some of the potential changes to the methodology with the local planning authorities, the final agreed methodology, and specifically the weighting attached to the different criteria has not been shared and we understand that this won't be made available now until after the draft London Plan itself is published. At this stage then it is unclear how our apportionment share (individually or pooled) will change, and specifically whether this will increase. Whilst some contingency was built into the West London Waste Plan (WLWP), it is possible that this may be exceeded (particularly given that arisings are projected to grow), and there may therefore be a need to identify new and/or additional sites. In this scenario then the authorities (whether individually or collectively) will need to consider whether the current WLWP needs to be reviewed.
30	325	Local Authority	Steve Barton	London Borough of Ealing	Environment and Utilities	EU6		In early discussions with the GLA on the revised apportionment methodology it was understood that they did not intend to allocate an apportionment to the Mayoral Development Corporations (a position which I understand the OPDC are also pushing for). In commenting on the draft methodology the Council has raised concerns with this decision, noting specifically that we fail to see how the apportionment and policies underpinning it can be implemented unless all LPAs have control over the management of this. As noted above the final apportionment methodology has yet to be shared, and so we are unclear whether any such changes will resolve our concern (if indeed they can be), however based on what has been shared to date the methodology is in our view fundamentally flawed and unsound in this respect. Whilst this clearly will be a matter which we will pursue with the GLA, as this may have implications for your Local Plan it is important that we raise these here to give you the opportunity to respond to this now. Both the earlier and draft apportionment methodologies recognise the importance of land capacity as a factor in determining the apportionment share. This capacity represents potentially suitable sites for accommodating waste facilities. Given that waste facilities are traditionally directed to industrial areas, the amount of industrial land within a borough will be a key determinant of the overall apportionment share allocated to that borough. Both the previous and draft apportionment methodology calculate Ealing's future capacity by including all of our industrial land (where its use falls within the relevant categories as defined in the 2015 baseline), including that land within Park Royal. Park Royal comprises by far our largest single concentration of employment land in the borough accounting for approximately 43% of Ealing's supply of designated industrial land (SIL & LSIS), and under the proposed approach to calculating apportionment this supply will be a key determinant of our overall apportionment percentage. Should the GLA continue to pursue this approach Ealing will be placed in an impossible position, as our ability to satisfy this apportionment through utilising a significant area of land to accommodate future waste facilities now no longer exists following the transfer of planning powers to the OPDC. The ability to utilize this capacity and to allocate new waste sites in this area now resides solely with the OPDC. The implications of this are not unique to Ealing, potentially affecting other neighbouring boroughs too. For the apportionment model to work effectively it is key that all LPAs with potential land capacity take a share of the demand, and for that reason we would press you to accept an apportionment share. With regard to the Local Plan policy itself, this should be revised and future proofed to respond to this possible scenario. This will require positive action which goes beyond just safeguarding the existing identified sites in the respective waste plans. Notwithstanding our preference for the ODPC to have its own apportionment, if the OPDC are serious about working with the boroughs (as stated in para. 6.68), such efforts will need to move beyond co-operation, and take more of a collaborative approach.
30	326	Local Authority	Steve Barton	London Borough of Ealing	Environment and Utilities	EU6	b) - c)	As a starter, the approach to compensatory provision set out in clauses b-c should be revised in a way which recognises the plans responsibility to accommodate and manage its demand. The sequential approach fails to identify the plan area as the starting point for identifying alternative sites. Given the quantum of potentially suitable industrial land in the plan area surely this would be prioritised in the first instance, and it is therefore surprising that this hasn't been included as a first preference. More generally however we'd also query whether you can implement a policy which involves directing development to areas beyond the plans locus, or even beyond the waste authority areas. We struggle to see then how you could demonstrate that such a policy would be achievable/deliverable.
30	327	Local Authority	Steve Barton	London Borough of Ealing	Environment and Utilities	EU6		Clarity would also be welcome regarding your intentions as to the status of that part of the WLWP covered by your Local Plan on its adoption. It is noted in clause a) of your draft policy that proposals will need to comply with the policies in the WLWP, and it is assumed therefore that there are no intentions to supersede the WLWP through the adoption of the local plan. There might be value then to review your policy again to avoid unnecessary/unhelpful duplication and inconsistencies. Given the absence of any policies covering the management of proposals on windfall sites it is assumed that WLWP policy 3 will continue to be applied.
30	361	Local Authority	Steve Barton	London Borough of Ealing	Environment and Utilities	EU6	6.69 Figure 6.9	Para 6.69 and figure 6.9 identify only two sites within the WLWP area as being safeguarded, and this is incomplete as the WLWP safeguards all existing licensed waste management facilities with no identified potential for intensification (included in appendix 2 of the WLWP – although this might need to be reviewed), existing sites with potential capacity for expansion (the 2 sites already identified), and new sites (none of which fall within the plan area).
32	399	Local Resident	Bernie Timmins		Environment and Utilities	EU6		Powerday needs to go!! This site causes misery for all local residents and also for those not so local when the wind is blowing In a particular direction. What on earth is the point in more residential development in the area when those people will have their surroundings spoiled by the omissions from this site? Filth, smells, particles, serious problems with flies. Are the OPDC serious in their attempts to make the area healthier and greener for all of us? with powerday still in operation, this is impossible. We have enough to contend with in the area. Please take action to address this huge problem.
33	415	Strategic Partner	Mark Furnish	Sport England	Environment and Utilities	EU1		Open space has a big contribution to formal and informal sport and recreation which should not be eroded, especially where a clear surplus of playing field has not been identified. In this regard, the wording of Policy EU1: Open Space broadly reflects the NPPF, paragraph 74, which does allow for the loss of open space, sports and recreational buildings and land if it is replaced but this replacement must be of at least equivalent in terms of quality, quantity and accessibility. Given the character of the area, it would be difficult to provide a replacement site that has the same quality/function of existing open space as it is likely to result in sports teams using a site to potentially have to split

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								between sites, have addition costs, etc. which would render it difficult to meet the 'equivalent' requirement. As a result, Sport England would prefer a clear overriding protection policy, especially in relation to open space sites that are playing fields, such as Wormwood Scrubs. F
33	416	Strategic Partner	Mark Furnish	Sport England	Environment and Utilities	EU1	6.1	Furthermore Sport England is concerned that the requirement for b) does not have the 'the strongest protection' as advocated in a) as paragraph 74 does not differentiate between Metropolitan Open Land (MOL) and other sites therefore Policy EU1: Open Space should not. The separation of MOL sites and other open space sites in Policy EU1: Open Space, and stated in paragraph 6.10, insinuates a weaker position in relation to non-MOL land.
33	417	Strategic Partner	Mark Furnish	Sport England	Environment and Utilities	EU1		Sport England is concerned that the important role open space for sport and recreation, especially Wormwood Scrubs, is not articulated which might, therefore, not been given the weight it requires when developing and assessing proposals concerning open space. Sport England, therefore, advise that the role of open space in providing formal and informal sport and recreation is specially mentioned in Policy EU1: Open Space or the supporting text.
36	483	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Environment and Utilities	EU6		Paragraph 5.80 of the London Plan requires MDCs to co-operate with the local borough to ensure that its apportionment requirements are met. The early work carried out for the OPDC's Waste Apportionment Study shows that the Old Oak Sidings (Powerday site) can meet LBHF's apportionment target. However, LBHF forms part of the Western Riverside Waste Planning Authority (WPA) which pools the boroughs' apportionments and the four Western Riverside WPA boroughs are working together to collectively meet apportionment. The Mayor understands that the OPDC is working with the Western Riverside WPAs and other key stakeholders to test assumptions and work is underway to derive the exact waste throughput from the Old Oak Sidings site that can be counted towards meeting apportionment. The OPDC should work positively with the Western Riverside WPAs to consider the potential for any additional capacity to contribute towards meeting the wider pooled apportionment requirements
38	504	Local Resident	Tim Potter		Environment and utilities	EU6	6.72	In considering the environmental features of the development, I would urge that serious consideration be given to the relocation of the large recycling and waste plant currently occupied by Powerday. This has the potential to cause untold blight to the entire development area through pollution on a number of fronts, be it poor smells or poor air quality. As a local resident I can report that the occupation by Powerday currently significantly reduces the quality of life of those living in the area, particularly during the Spring to Summer months of May to September when the weather is warmer. Problems include smells of rubbish lingering over the area, large flocks of sea gulls chasing and scavenging rubbish, and large increases in the number of flies throughout the summer. The flies have been infesting the homes of local residents in the area each summer as well as The Collective building nearby and its restaurant. This results in regular complaints to the Environment Agency to try to resolve problems which appear to be chronic. I would strongly encourage your surveyors and contractors to take a very careful look at the environmental impact of Powerday on the entire area, the source of the large fly populations during Spring and Summer months, particularly as both residential and office developments are being considered. There is a strong case for considering the relocation of Powerday to another site to remove a blemish right at the heart of this very important development.
40	518	Local Resident	Lori Wiechec		Environment and utilities	EU6	6.72	Furthermore I think that that Powerday should be stripped of its licence, we don't want to live next to a dump that stinks of garbage every time the sun is out and the weather warm. The area is infested with vermin, rats and an immeasurable amount of flies.
42	575	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Environment and utilities	EU1	a)	Part a) of this policy says that any loss or harm to Wormwood Scrubs will only be permitted in very special circumstances. We query how this policy will operate in relation to proposals brought forward in line with other policies in the Local Plan, such as Policy P12 c) which refers to the enhancement of Wormwood Scrubs including the provision of playspace, and in 3.83 the potential for enhanced functionality and accessibility of Wormwood Scrubs.
42	576	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Environment and utilities	EU1	c)	Part c) of this policy (and Policy SP8) requires 30% of the developable area outside of the SIL to be provided as public open space, which includes two 2-hectare parks in OOP. We think this could be excessive given the presence of Wormwood Scrubs which alone already accounts for over 10% of the total OPDC area.
42	577	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Environment and Utilities	EU1	d)	Part d) has a list of functions that all open space (including private and communal areas) should provide. This is a long and onerous list of requirements for each space to provide – is that the intention, or is the policy suggesting that in their entirety the open spaces within the plan area should provide for these functions?
42	578	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Environment and Utilities	EU1	iv)	Part iv) states that where it is not possible or desirable for individual developments to make on-site open space provision, a financial contribution will be sought for open space however we object to requiring payments for resident and workers separately, as both types of users will use the same open space but at different times. Consequently this approach would lead to double counting for space.
42	579	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Environment and Utilities	EU7		Whilst we acknowledge and share OPDC's aspirations in this regard, this policy has the potential to be particularly onerous, requiring the submission of information which goes well beyond the planning application stage to include the supply chain, end users and even potential future owners. It is at a scale that is appropriate for Building Regulations and national policy, but is not, we feel, appropriate to be introduced into the OPDC Local Plan where it is not a requirement for other development in London. Such onerous requirements will place further limitations on development at Old Oak, which as an Opportunity Area already has a significant challenge compared to development in established parts of London where it has to fund significant infrastructure costs whilst having greater uncertainty and risk on values. To introduce requirements that further constrain elements such as commercial lease arrangement and construction procurement routes is unnecessary and overly burdensome, and we would request sustainability policies which are proportionate and appropriate when viewed alongside parallel control regimes.
42	580	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Environment and Utilities	EU11		We question the appropriateness of including a policy relating to technology in the Local Plan. It is not the responsibility of the planning system to govern broadband speeds, or set planning policies relating to the protection of data, protocols and data management systems. Whilst we support the aspirations, we consider that this is a function that can be provided by the OPDC outside of the development plan.

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								Its inclusion in the plan adds further cost and burden to the planning process, and generally to the cost of development in the Opportunity Area. Remove this policy
47	690	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Environment and Utilities	EU3		The Council supports the collaborative approach referred to in point a, the aim not to exceed greenfield rates of surface water run-off and the sequential approach to reduce surface water runoff referred to in point c.
47	691	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Environment and Utilities	EU3		However, it is disappointing to see that reference to the acute lack of capacity in the Counters Creek sewer has disappeared from the draft policy included for Regulation 18. The wording of point e) of the draft policy reads: “due to the limited capacity of the combined sewer serving the Counters Creek catchment, demonstrate that the scheme would result in the release of network capacity, or includes the provision of capacity improvements sufficient to meet its needs without adversely impacting on existing development, or compromising the ability of other developers to meet the future needs of development planned for in the Local Plan;” Reference to this issue is now found in the supporting text (paragraphs 6.36 and 6.37, page 166) which explains how the combined sewers have no capacity to accept increased flows and therefore surface water run-off peak discharges should be reduced to greenfield run-off. However, the Integrated Water Management Strategy explains in section 4.2 that the estimated peak instantaneous sewer discharge will increase about five times for the whole OPDC area. It seems that the previous draft policy would result in an overall increase of capacity in the combined sewer network whereas this aim is not clear with the current wording.
47	692	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Environment and Utilities	EU3	Figure 6.5	Figure 6.5 does not explain if there are any designated Critical Drainage Areas within the OPDC area. If so, this could be included in the figure to clarify the locations in which Flood Risk Assessments are required.
47	693	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Environment and Utilities	EU1, EU3		The cross-reference to SuDS under policies SP8 (Green Infrastructure and Open Space), EU1 (Open Space), EU2 (Urban Greening and Biodiversity) and EU3 (Water) is welcome as are the references to green infrastructure in most of the site allocations.
47	694	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Environment and Utilities	EU3		
47	695	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Environment and Utilities	EU3		
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47	697	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Environment and Utilities	EU3		
47	698	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Environment and Utilities	EU3		
47	699	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Environment and Utilities	EU6		The following is a joint response from London Boroughs of Lambeth, Wandsworth and the Royal Borough of Kensington and Chelsea. Planning for waste management is a strategic (cross-Borough) matter and subject to the legal requirement of the Duty to Cooperate. The National Planning Policy for Waste (NPPW) states that waste planning authorities should “work collaboratively in groups with other waste planning authorities... through the statutory duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management” (Paragraph 3). The London Plan also states, “Boroughs may wish to collaborate by pooling their apportionment requirements” (Policy 5.17F). OPDC became the responsible planning authority for waste management facilities which fall within Hammersmith and Fulham in April 2015. This includes the large EMR and Powerday waste management facilities. Whilst it has waste planning responsibilities, it does not have a waste apportionment target which it is required to meet.
47	700	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Environment and Utilities	EU6		The Western Riverside WPAs including OPDC have worked together to prepare a joint Waste Technical Paper and undertake engagement on waste movements. At a meeting in January 2017, Officers of the Western Riverside WPAs agreed to “pool apportionments, arisings and available capacity for all waste streams”. The WPAs have sought to formalise this agreement through a Memorandum of Understanding. However, the OPDC has resisted committing to pooling apportionment targets and capacity with the Western Riverside WPAs.
47	701	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Environment and Utilities	EU6		However, the OPDC's policy and strategy for waste in its revised draft Local Plan is a major impediment for the Western Riverside WPAs to pool their apportionments and plan collectively for waste. OPDC's approach to waste only takes account the waste capacity needs of Hammersmith and Fulham. The Powerday facility is safeguarded as it meets Hammersmith and

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								Fulham's waste apportionment but the EMR is being released for development because it is "not required to meet [LBHF's] apportionment". In fact, the EMR facility is a vital contributor of 160ktpa apportionment capacity for the Western Riverside WPAs. We do not believe that the OPDC has taken into account the wider Western Riverside joint working relationship or aims when developing the Plan.
47	702	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Environment and Utilities	EU6		Policy EU6c) applies a sequential test to the location of compensatory capacity, and we are concerned that if compensatory EMR capacity is not provided within LBH&F or the WR area the potential for pooling apportionment will be permanently lost. We therefore suggest that Policy EU6c) is amended to ensure replacement capacity is provided within the OPDC host borough in which the facility is located as a priority.
47	703	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Environment and Utilities	EU6		It should be noted that the GLA encourages boroughs to work together and pool their apportionment but is overseeing (as the OPDC is a Mayoral Development Corporation) a waste strategy which fails to take into account the impact on the other Western Riverside WPAs and fulfil the Duty to Cooperate.
47	704	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Environment and Utilities	EU6		Whilst safeguarding of the Powerday facility is welcomed, the OPDC local plan and Waste Management Strategy does not set out the measures that will assist in maximising/ re-orientating the waste management capacity at the facility, or provide an indication of the anticipated apportioned capacity the site could achieve if such measures were implemented.
47	705	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Environment and Utilities	EU6		In addition to the above joint response, this Council also highlights that the Duty to Cooperate, between OPDC and RBKC specifically, comes into effect directly as result of the OPDC becoming the responsible planning authority for waste management facilities in Hammersmith and Fulham. Capacity which is committed to assist RBKC in the current adopted LBHF Core Strategy at paragraph 8.102, has effectively been taken away from RBKC in light of the formation of the OPDC. The Council is disappointed to see that the arrangement in the current adopted LBHF Core Strategy has not been reflected in the OPDC Local Plan.
49	741	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Environment and Utilities	EU7		PRBG supports the Circular Economy recommendations and opportunities set in the OPDC Local Plan and its supporting Circular and Sharing Economy (CSE) Study. Backed up by sufficient resource in the implementation phase of the local plan this provides a promising policy framework on which to develop a circular and sharing economy in the Old Oak and Park Royal area. This can build on West London's foundations as home to the capital's largest concentration of circular economy jobs. This is supported by the substantial concentration of services in Park Royal enabling the hiring/ sharing of tools and products (particularly for construction and the film industry). The concept of circular economy has growing recognition within the business community, although less so within the SMEs and micro-enterprises that form a significant proportion of Park Royal businesses. New business models are emerging in response (see Heathrow's 2.0 strategy, March 2017). The Group believes that there is a real opportunity to pioneer this concept in West London, and notably in Park Royal if appropriate business support programmes are put in place. Looking at the recommendations that emerged from the West London Sustainability and Climate Change Policy Commission, in its Green City in The West: Leading the transition report, PRBG suggests that: - a West London Circular Economy Working Group is established to start to connect key stakeholders and provide a platform to develop insight and then infrastructure with a view to implementing the circular economy concept in Park Royal and more widely in West London - studies should be commissioned on a company-by-company, location-by-location basis by the public and private sectors to better understand the changing business processes required to transition from a linear to circular economy. o Circular Economy Opportunity 1: Park Royal and Heathrow are significant food producers/ consumers in close proximity to one another. This may present opportunities for a more closed loop, circular design to both locations' use of resources. o Circular Economy Opportunity 2: Working with Thames Water to better understand the Park Royal (grey) water cycle. o Circular Economy Opportunity 3: Explore the potential for heat extraction from grey water. The Group looks forward to further exploring with OPDC the four circular economy scenarios set in the CSE Study and taking short-listed ideas forward.
49	742	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Environment and Utilities	EU11		PRBG supports the recommendations set out in the Local Plan and Smart Strategy Study, notably the vision for Old Oak and Park Royal to become a world-leading location for the exploration and implementation of Smart City technologies. Smart cities technologies are already being deployed in many parts of the world and PRBG believes that the Old Oak and Park Royal area could become a London and UK exemplar by implementing Smart City technologies and focussing on process (e.g. stakeholder collaboration), infrastructure (e.g. sensors) and open data (e.g. public authorities making available data collected). Currently, one of the biggest challenges to implement Smart cities technologies in Park Royal is the lack of broadband connectivity in the area (see section on 'broadband' below). Fast and reliable digital connectivity is critical if we want to transform the area into a world-leading location for the implementation of Smart City technologies. We welcome the OPDC policies in this area. It may be that the supporting text could reference how Park Royal – if fast broadband infrastructure is in place – might provide a test bed opportunity for OPDC and partners to explore the use of smart cities technologies.
49	758	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Environment and Utilities	EU10		The increased electrification of heating, development of electric vehicles, and increased use of computers and business growth through intensification means that energy demand will increase in Park Royal. In recent years Park Royal businesses have had to invest directly in electricity infrastructure upgrades. As such, PRBG welcomes OPDC's aspirations to support a low carbon and resilient energy network in Old Oak and Park Royal. We note OPDC's acknowledgement that the electricity infrastructure within the Old Oak and Park Royal area is close to capacity and insufficient to

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								cater for the full demand of the development envisaged over the lifetime of the Local Plan. As such, PRBG supports OPDC's requirement for applicants of major developments to demonstrate active engagement with Distribution Network Operators (DNOs) to identify spare capacity in the area. Where none exists, developers will be expected to demonstrate to OPDC their proposed approach to secure an increase in capacity to support the timely delivery of development. We would welcome additional clarification around electricity demand forecasts for Park Royal and where/when additional electricity distribution infrastructure will be needed on the estate to keep pace with intensification.
49	759	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Environment and Utilities	EU7		With regards to heat, PRBG supports OPDC's approach to develop a strategic decentralised heat network, which will source the heat from the Grand Union Canal, sewage networks, aquifers and from waste (Energy from Waste), although we are concerned that this investment and policies may be focussed on Old Oak and not Park Royal. Park Royal, as a larger food producer, holds the potential to develop Energy from Waste facilities, which would not only provide a low carbon energy source, but also contribute to the implementation of the circular economy concept.
49	760	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Environment and Utilities	EU11		Park Royal as an area suffers from poor internet connection and this problem represents a barrier to retaining businesses in the area, as well as to attracting new businesses. It also has a direct impact on businesses' productivity if they are slow to adopt cutting edge cloud-based software solutions. Our current understanding is that businesses can access ADSL broadband for a low monthly cost but a slow connection, or much faster leased lines, which are a very heavy cost burden on businesses employing 10 people or less. PRBG worked with OPDC during 2016 to identify whether particular areas of Park Royal suffered from particularly bad internet connections. The results indicated that the connectivity problem was pretty evenly distributed across Park Royal. The Group has supported OPDC dialogue with BT/ Openreach around the launch of an Openreach pilot in Old Park Royal which will give businesses in this area access to a Superfast or Ultrafast internet connection. The Ultrafast technology would incur more expensive monthly fees and so the Group has suggested surveying a sample of the businesses in the proposed Old Park Royal pilot area to better understand what solutions they are currently using and how much they would pay to access faster internet. Internet connectivity issues are only mentioned in one paragraph 6.126 under the Smart Technology Section in the Local Plan (p.186). It is a bit more developed in the Smart Strategy Study, section on utilities infrastructure (p.25). PRBG recommends a commitment to planning conditions being used to ensure developers are putting the right internal and external ducting in commercial and residential properties to enable quick and easy provision of services by a variety of service providers. Planning conditions could also encourage the adoption of standardised wayleave agreements by providers/ landowners, as well as kitemarks such as WiredScore.
50	768	Statutory Consultee	Ben Llewellyn	Environment Agency	Environment and Utilities			We strongly support the approach OPDC have taken to developing the policies within this chapter and for the high standards OPDC is expecting development to meet.
50	769	Statutory Consultee	Ben Llewellyn	Environment Agency	Environment and Utilities	EU2	d)	We strongly support this policy. Specifically the inclusion of references d) to the Green Spaces factor and Green points system score which may be essential to ensure that the multifunctional value of green space is accounted for in development, and to the Spatial Vision's delivery.
50	770	Statutory Consultee	Ben Llewellyn	Environment Agency	Environment and Utilities	EU2	f)	We are encouraged by the commitment to monitoring and promoting biodiversity networks within the OPDC. Any monitoring should be based on a robustly assessed baseline. We would welcome the opportunity to continue working with you to ensure that the evidence base behind EU2 includes detailed ecological studies and audits to establish a baseline and gaps. This will enable you to maximise the significant opportunities for habitat creation in the OPDC. It would help evidence the policy for biodiversity net gain to refer in explanatory text to the principles that underpin that objective. These have been developed by CIRIA, IEMA and CIEEM - https://www.cieem.net/biodiversity-net-gain-principles-and-guidance-for-uk-construction-and-developments). Note: these are currently under review. The Defra biodiversity metric has an identified hierarchy for offsetting and net gain.
50	771	Statutory Consultee	Ben Llewellyn	Environment Agency	Environment and Utilities	EU2	b) vi)	We welcome the reference at, b) vi) to delivering habitats which are climate change resilient. We feel this may be strengthened by also stating that that this applies to planting on buildings and in the public realm, and should ensure that habitats endure and can be maintained cost-effectively over the development's lifetime. Again there is a cross-over with Policy EU3.
50	772	Statutory Consultee	Ben Llewellyn	Environment Agency	Environment and Utilities	EU2	f)	We welcome the reference at Point f) to monitor the management of biodiversity and urban greening.
50	773	Statutory Consultee	Ben Llewellyn	Environment Agency	Environment and Utilities	EU3		We strongly support and welcome the Integrated Water Management Strategy under-pinning the policy. We have provided detailed comments on the IWMS under the section 'Integrated Water Management Strategy'. We strongly support this policy. We recommend that it is strengthened by it being amended to include reference to the requirements of the Water Framework Directive and River Basin Management Plan as a bullet within the policy wording. This could be strengthened even further by including the WFD improvement measures included as appendix 2 [Table of Water Framework Directive Improvement Measures for the Grand Union Canal] within the IDP. We also recommend that the policy is amended to reflect the reliance the Integrated Water Management Strategy places on retro-fitting existing industrial uses. We acknowledge that the policy will only be used for new development but there could be a requirement for developers to contribute financially to retro-fitting water efficiency measures to buildings that will not be redeveloped within the Park Royal area and the wider OPDC area.
50	774	Statutory Consultee	Ben Llewellyn	Environment Agency	Environment and Utilities	EU4		We strongly support this policy
50	775	Statutory Consultee	Ben Llewellyn	Environment Agency	Environment and Utilities	EU6	b)	We strongly support the requirements set out in this policy. Specifically at; b) the safeguarding of waste capacity, and compensatory site provision. Maintaining and increasing London's capacity to handle waste is key to sustainable development.
50	776	Statutory Consultee	Ben Llewellyn	Environment Agency	Environment and Utilities	EU6	h)	We welcome section h) the full enclosure of operational waste facilities; enclosure has the potential to reduce the impact of waste sites on local amenity, improving air quality and reducing the burden of noise on local residents. This is key, given the proposed intensification of residential uses around the OPDC.

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50	777	Statutory Consultee	Ben Llewellyn	Environment Agency	Environment and Utilities	EU6	l)	Finally we welcome section l) referencing LWARB's advice on waste collection from flats.
50	778	Statutory Consultee	Ben Llewellyn	Environment Agency	Environment and Utilities	EU13		We support this policy but consider the version included in the Regulation 18 consultation to be stronger as it required Site Investigation and Remediation Strategies to be submitted with applications for planning permission. This requirement may have helped applicants and OPDC better understand the financial viability of a development proposal when determining an application as the level of remediation would be known and the resultant cost would be better understood. However we have no objections to the policy as proposed due to the fact that Site Investigation and Remediation Strategies can be required by planning condition for proposals granted planning permission.
51	785	Local Resident	Stuart McCaffer		Environment and Utilities	EU6		I am writing this email regarding the roll of Powerday in the regeneration of my neighbourhood. How this company were aloud to open so close to houses in the first place is absurd but to propose to, as you put it 'safeguard' it is unbelievable. We have lived here for the last 4 years and there is nothing but problems to endure from this site if it's not the constant noise it's the smell or the flies. Of course surprisingly if you get in touch with them I'm sure it will be nothing to do with them as they don't do stuff like that but then again that's what they said about processing asbestos back in 2010. So now you are planing to use Powerday till...whenever. I can't see the new residents of your spanking new apartments being overly pleased with the goings on from their neighbours with the disgusting smells, flies and loud noises at all hours. But what do I know. I, my wife and two children only live here 50yards from the place so I don't expect we will count. People like us never do when money is involved.
55	826	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Environment and Utilities	EU11		The supporting text to this draft Policy states: "there are existing broadband issues in the OPDC area, in particular, in Park Royal. OPDC is working with broadband and telecommunications companies to overcome these. New development proposals should deliver the highest speeds of wired and wireless broadband, to enable to the Old Oak and Park Royal area to appropriately compete with other businesses on the global stage" (p186). SEGRO and its customers are currently experiencing significant problems with broadband capacity and speed, which is having a substantial impact on their business. SEGRO welcomes the OPDC's acknowledgement of the issue, and requests that OPDC takes an active role in instigating upgrades to fibre broadband as a matter of urgency.
55	827	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Environment and Utilities			In the context of Chapter 6, SEGRO would also like to make OPDC aware of the power issues faced by SEGRO's customers in the area. Frequent power outages have a highly detrimental impact on the operations of these businesses, and so SEGRO requests that OPDC considers how the plan might address such issues to help new and existing businesses operate more effectively.
56	887	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU1		As LBHF remains the Local Authority area and will take over if the OPDC organisation is dissolved, LBHF should be party to any management and maintenance plans to ensure LBHF does not incur any additional costs as a result of development approved by the OPDC.
56	888	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU1	a)	Object to bullet point (a) states that developments will be supported which give Metropolitan Open Land (MOL) including Wormwood Scrubs the strongest protection. In the next line it says that "proposals that result in loss or harm (including erosion in the quality) of MOL will only be permitted in very special circumstances and where at least an equivalent quantum and quality of open space is provided. The second statement in bullet point a) is not considered to be in accordance with national or London Plan policy on MOL. Paragraph 7.56 in the current London Plan states that 'Development that involves the loss of MOL in return for the creation of new open space elsewhere is not considered appropriate'; MOL is granted this status for a number of reasons and cannot be 'offset' by an equivalent quantum elsewhere. This raises concerns, even if such degradation of MOL would only be allowed under very special circumstances. Suggested chage to text: a) Give metropolitan Open Land (MOL), including Wormwood Scrubs the strongest protection. Proposals that result in loss or ham (including the erosion in the quality) of MOL will only be permitted in very special circumstances and where at least an equivalent quantum and quality of open space is provided; Make reference to the London Plan policy 7.17 which outlines 'very special circumstances', in the supporting text.
56	889	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU1	b	LBHF does not consider bullet point (b) to be acceptable to re-provide open space a long way from the existing space that has been lost. This should be considered in more detail, otherwise there is scope for developers to comply with the policy but cause undesirable impacts in terms of access to open space.
56	890	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU1	c)	(c) Support the delivery of a minimum of 30% of the developable area as publicly accessible open space as long as the 30% target does not include open space being provided to make up for losses elsewhere in the OPDC area. This should be clearly identified in the AMR.
56	891	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU1	c)	(c) (iv) Is there a set formula for calculating contributions where adequate open space cannot be provided? Have some concerns, that provision of the required amount of open space will be difficult on some sites, and that even though a financial contribution is made to deliver open space elsewhere, this may not be possible. What happens in those circumstances?
56	892	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU1	d)	(d) LBHF welcomes the fact that this part of the Policy ensures all open space is high quality and provides for a range of well thought out defined functions.
56	893	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU1		LBHF Local Plan policy OS3 makes reference to seeking improvements to existing facilities in open space, such as the Linford Christie Stadium. As OPDC borders the Linford Christie Stadium, LBHF would welcome OPDC's acknowledgement of this by adding reference to this in the supporting text.
56	894	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU2		Weak wording in the opening paragraph of the text is concerning as it states that the "OPDC will seek to ensure that development in the OPDC area secures an overall increase in green cover and a net gain in biodiversity...". This is weaker than the opening commitment in EU1 which states that that the "OPDC will secure the delivery of high quality green infrastructure and open space network...". Revise EU2 to reflect the intention to "secure" rather than "seek to ensure".
56	895	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU3		The policy states that developments will be supported where they include a range of measures which support an integrated approach to managing foul and surface water. Measures are outlined and a hierarchy promoting preferred sustainable drainage measures (SuDS) is presented.

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								There is concern that the hierarchy does not include collection of rainwater and greywater for re-use. Water re-use is mentioned in the policy but given that the OPDC Integrated Water Management Strategy sets an objective of reducing as far as possible the demand for centralised water supply by re-using water on-site, far greater emphasis is required. The current London Plan Drainage Hierarchy puts rainwater harvesting at the top of the list, so there is an inconsistency in the approach of Policy EU3.
56	896	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	Para 6.33		The text should state that the OPDC will require that developments achieve the highest standards of sustainable development, not just “seek to ensure” this.
56	897	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	Para 6.35		When referring to working with Local Authorities it would be appropriate in this paragraph to refer to their roles as Lead Local Flood Authorities.
56	898	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	Para 6.38		Reference is made to the use of the Grand Union Canal as part of an integrated approach to managing surface water run-off. This can only work if the Canal and River Trust provide consent for such discharges. Given the potential importance of the canal in this respect, the OPDC should work closely with CRT to ensure that this option is maximised where feasible.
56	899	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	Para 6.39		The emphasis on the use of above ground measures in preference to underground attenuation tanks is welcomed as this is in line with the H&F Local Plan priorities.
56	900	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	Para 6.41		The need to carry out a Flood Risk Assessment should not be limited to just major developments. FRAs should be carried out for any development where there is a high or medium risk of flooding from a river or where other sources of flooding such as surface water could cause significant impacts. The text should include this.
56	901	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	Para 6.42		This paragraph states that “Rainwater harvesting and greywater recycling will be expected in non-residential developments”. This is welcomed, but it may not be appropriate to exclude all residential development from the requirement to use such systems, as there could be some residential developments where this would be suitable.
56	902	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	Para 6.43		Given that demand for water in the OPDC area will increase and that water availability will be decreasing, the OPDC could set a more stringent policy in terms of use of main water. The current policy of achieving a consumption target of 105 litres a day per capita in residential developments is no different to current requirements. Requiring applicants and water suppliers to help residents identify how they can reduce water consumption is not considered to be adequate and a more stringent water use target should be set in the policy.
56	903	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU4		As LBHF borough is an Air Quality Management Area under the 1995 Environment Act – Part IV, it is essential that the impacts of any development is agreed with the Council whose responsibility it is under this act to ensure that air pollution is being adequately addressed. This should be established in this policy. Although it is identified that assessments would be necessary, it should be specified that these must be agreed with the individual local authorities. Another significant mitigating factor is that the European Commission has issued the UK with a ‘Letter of Formal Notice’ for breaching NO2 limit values. Defra and the GLA have written to the Council calling for cooperation in tackling the problem, but also reminding us of Government powers that could require local authorities to pay the associated EU fines. Fines could therefore be levied on the Council if there are exceedances as a result of this development although its management would not be in the Council’s control. OPDC Plan EU4 policy should take into account LBHF future air quality planning policy (CC10) below: Policy CC10 - Air Quality The council will seek to reduce the potential adverse air quality impacts of new developments by: a. requiring all developments which may be impacted by local sources of poor air quality or may adversely contribute to local air quality to provide an air quality assessment that considers the potential impacts of pollution from the development on the site and on neighbouring areas and also considers the potential for exposure to pollution levels above the Government’s air quality objective concentration targets. The assessment should include separate consideration of the impacts of (i) the construction/demolition phase of development and (ii) the operational phase of development with appropriate mitigation measures highlighted for each phase; b. requiring mitigation measures to be implemented to reduce emissions, particularly of nitrogen oxides and small particles, where assessments show that developments could cause a significant worsening of local air quality or contribute to the exceedances of the Government’s air quality objectives; c. requiring mitigation measures that reduce exposure to acceptable levels where developments are proposed that could result in the occupants being particularly affected by poor air quality; d. requiring developments to be ‘air quality neutral’ and resist development proposals which would materially increase exceedances of local air pollutants and have an unacceptable impact on amenity or health unless the development mitigates this impact through physical measures and/or financial contributions to implement proposals in the Council’s Local Air Quality Management Plan; and e. requiring all decentralised energy schemes to demonstrate that they can be used without having an unacceptable impact on air quality. Where this is not possible, CHP systems will not be prioritised over other air quality neutral technologies.

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								Justification 6.297 Nearly one in seven deaths (15%) in Hammersmith and Fulham are caused by Nitrogen Dioxide via pollution - the eighth highest level in London according to Kings College London. The whole of Hammersmith and Fulham is an Air Quality Management Area for Nitrogen Dioxide (NO2) and particulate matter (PM10) and the council is implementing measures to help meet national air quality objectives for these and other pollutants. New developments are expected to contribute towards improving local air quality, particularly where they include potentially major new sources of emissions or could significantly increase traffic-generated emissions. Some developments such as schools, nurseries, hospitals and care homes for the elderly and also housing, may be particularly affected by the potential impacts of poor air quality on the occupants of the development. 6.298 Requiring air quality issues to be considered early in the planning process and to be assessed in detail if necessary (i.e. for developments that may increase local emissions significantly) is the best way of establishing a design led approach to mitigating those emissions and reducing exposure. Air quality assessments should include 'air quality neutral' assessments carried out with reference to the GLA's emission benchmarks for buildings, transport and combustion based energy plant. Developments that do not exceed these benchmarks will be considered to be 'air quality neutral'. Some carbon reduction measures for energy generation and spatial heating can adversely impact local air quality if not properly mitigated. The use of individual Combined Cooling, Heating and Power (CCHP), Combined Heat and Power (CHP) and Biomass to produce heat and power can deliver significant reductions of CO2. However, the use of these technologies could also lead to increases in NO2 and particle emissions. Therefore, their air quality impacts need to be assessed as part of an Air Quality Assessment. CHP or other combustion based technologies that cannot demonstrate that they will have acceptable impacts will not be accepted and instead the use of other sustainable energy generation air quality neutral technologies should be used which reduce both CO2 and NO2 emissions. Opening wording should be clearer and insert that applicants will be required to do an assessment: EU4: Air Quality Development proposals will be supported where they provide an air quality assessment in consultation with the local authority that shows how they appropriately minimise air pollution and make a positive contribution to overall improvement in air quality by:... 6.51. '...to ensure that future iterations of AQAPs are aligned for the OPDC area and support the aspiration to achieve high standards of air quality, thereby avoiding fines imposed by the EU Non-Compliance.'
56	904	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU6		The OPDC area sites are within the Western Riverside Waste Authority (WRWA) area and as part of the Duty to Cooperate, OPDC have been working effectively with Hammersmith & Fulham Council as well as the other boroughs within the WRWA area (Kensington & Chelsea, Lambeth & Wandsworth) on waste matters. This has included the preparation of a joint Waste Technical Paper.
56	905	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU6		LBHF's apportioned waste total for 2036 as specified by the London Plan (2016) is 247,000 tonnes. Two large waste sites (Powerday & EMR) and three other smaller sites exist were within Hammersmith & Fulham. As of April 2015, these waste sites now fall within OPDC's boundary. OPDC has not been allocated a waste apportionment target, but as required by the London Plan, OPDC are required to work with host boroughs to ensure their apportionment targets are met. Through the preparation of joint evidence work and engagement with the waste operator, the Old Oak Sidings (Powerday) site has been identified as having sufficient capacity and land to meet LBHF's London Plan apportionment target up to 2036. LBHF therefore supports the approach taken in OPDC's Local Plan Policy EU6 which safeguards the Old Oak Sidings (Powerday) site for waste management purposes over the lifetime of the Local Plan to ensure LBHF's apportionment target is met. LBHF will continue to work with OPDC to ensure LBHF's apportionments can be met and capacity at Powerday is optimised. However, LBHF express concern for (i) to (ii) of point b which appear unclear and seem to contradict the safeguarded status of the Old Oak Sidings (Powerday) site which could allow for potential redevelopment of the site and compromise LBHF's apportionment capacity. As currently drafted, the policy appears to give the same level of protection for safeguarded and non-safeguarded waste sites, which would allow for safeguarded waste sites to be lost. Furthermore, this site is safeguarded in P2: Old Oak North. As a Duty to Cooperate matter, the safeguarded waste sites should be safeguarded for waste purposes for the lifetime of the Local Plan and given greater protection to ensure these are not lost to non-waste uses. Points (i) to (ii) of part b) are unclear and contradict the safeguarded status OPDC is proposing for the Old Oak Sidings (Powerday) site. Policy to be amended as follows: -

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
								“b) safeguard the existing permitted capacity at the Old Oak Sidings waste management site in Old Oak North and waste sites in Park Royal identified in the West London Waste Plan to meet local authority apportionment requirements. unless: i) compensatory site provision is provided in accordance with part c) i) to iii) below or it can be demonstrated that a loss of capacity will result in more waste being managed higher up the waste hierarchy; and ii will not compromise the ability of the local authorities to achieve their waste apportionment targets;” Amend point c of Policy EU6 to reflect this also: - “(c) Applications involving the loss of non-safeguarded waste management site(s) lost to a non-waste use will be required to provide compensatory site provision which.....”
56	906	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU6		OPDC’s Local Plan is not proposing to safeguard the EMR site and three other smaller waste sites for waste uses which are proposed for redevelopment. The EMR waste site is allocated for redevelopment in Policy P2 in order to facilitate regeneration of Old Oak North area. In line with the London Plan, the capacity at EMR should be appropriately replaced, with priority given to any potential suitable locations within LBHF & then the WRWA area to ensure EMR capacity is not lost and control given to other boroughs outside of LBHF and the WRWA area. LBHF wish to be involved in any application discussions on the EMR site to ensure the waste capacity is appropriately re-provided in a suitable location. Suggested change to text: (c) Applications involving the loss of non-safeguarded waste management site(s) lost to a non-waste use will be required to provide equivalent or enhanced compensatory site provision which normally meets the maximum throughput the site could achieve. Site re-provision should be made in the most appropriate location, in the following sequential manner:- i) within the borough where the site is located within the OPDC area ii) within the Waste Authority Area where the site is located West London Waste Plan Authority & Western Riverside Planning Authority area within the borough where the site is located iii) within the Greater London. Within the Waste Authority Area where the site is located.
56	907	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	Para 6.74		The wording could be enhanced to better explain how re-provision would work and to make clear that this would be for non-safeguarded waste sites. Amend para 6.74 as follows:- “Other non-safeguarded waste management sites not required to meet apportionment can still help drive improvements and flexibility in achieving self-sufficiency across London. Therefore in line with Policy 5.17 of the London Plan, existing non-safeguarded waste management sites which are proposed for redevelopment should promote additional will be required to provide equivalent or enhanced compensatory site provision which meets the maximum throughput the site could have achieved. In line with point (c) of Policy EU6, a A sequential approach will be applied to account for the proximity principle, which requires waste to be managed as close to the source as possible. This policy requirement should be discussed with any applicants Applicants should discuss these requirements with OPDC and the local authority at the earliest opportunity, during pre-Application discussions.”
56	908	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	Para 6.76		The wording of para 6.76 could be improved. Amend para 6.76 as follows:- OPDC will work with the operators of the waste sites and other relevant stakeholders and interested parties the Environment Agency, the waste authorities, local authorities, businesses and residents to find ways to introduce energy generation in a way that delivers benefits and addresses adverse impacts to the area.
56	909	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU8		Given the recent tragedy at Grenfell Tower, whilst we support the use of sustainable materials in new developments, the use of such materials to boost the environmental performance of buildings, including the use of cladding materials, can only be considered with reference to the need to prioritise compliance with fire safety and other safety critical Building Regulations. Bullet point (g): suggest that this could also include a reference to “and can easily be recovered and re-used/recycled when demolished.
56	910	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU9		The Policy states that major development proposals will be supported where they demonstrate compliance with a range of specific requirements in relation to meet or exceed the London Plan’s carbon reduction targets following its Energy Hierarchy. The Policy also includes reference to all development proposals for non-residential development being supported where they achieve the BREEAM ‘Excellent’ rating. The inclusion of BREEAM references is not considered appropriate as BREEAM covers a multitude of environmental issues, not just CO2 emissions/overheating. Suggest that BREEAM requirements would be better off in Design Policy D4 Well Designed Buildings. It may be appropriate to acknowledge in this Policy that carbon reduction measures may have impacts that need consideration and mitigation (i.e. local air quality).
56	911	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	Para 6.100		The production of SPD guidance on the carbon price to be charged for carbon off-setting payments is welcomed and we encourage the OPDC to carry this work out as a priority. Clarity on how payments in lieu for OPDC developments will be organised is necessary as currently this arrangement is unclear and we are concerned that we may lose out on this potential source of funding for the implementation of carbon reduction measures in the borough. We would welcome working in partnership with the OPDC to develop the SPD.

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
56	912	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU10		The policy promotes the delivery of low carbon and energy efficient heat/electricity networks. There is no specific reference in the policy to Energy from Waste schemes – perhaps surprising given the wording included in Policy P2. Para 6.114 of the supporting text refers to Energy from Waste plants providing a significant potential for heat which will be supported where developers come forward with schemes that comply with other relevant policy considerations (e.g. air quality) and that are designed at the outset to make use of the available heat. Also, see concerns raised in relation to the same issue for Policy P2 – i.e. is the OPDC an appropriate location for energy from waste schemes? Can all impacts be sufficiently mitigated? No evidence base presented.
56	913	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Environment and Utilities	EU10		The Policy as worded is generally supported, although we consider that there should be reference in the text to the need for all low carbon and communal combustion systems to demonstrate that they can be used without having an unacceptable impact on air quality. Where this is not possible, such systems will not be prioritised over other air quality neutral technologies.
57	963	Local Resident	Scott Cawley		Environment and Utilities	EU6		I cannot believe that the OPDC developments fail to deal with a major blot on the landscape in the area - the waste recycling plants Powerday, EMR, CMR. I understand that these are present in the London Waste Management plan and so are currently protected. If that is the case then that Waste Plan needs to be changed pretty swiftly as part of this development work, as no one will buy nice flats, or walk up a metropolitan style High Street when this whole area will in the shadow (and within range of the stink) from those monstrosities. You need only look out from Willesden Junction train station to that area to see a landscape that looks like something out of Blade Runner.
61	983	Local Resident	Ron Thorp		Environment and Utilities	EU1		What open space? It's chronically over developed already.
61	984	Local Resident	Ron Thorp		Environment and Utilities	EU2		Horn Lane and surrounding areas has appalling air quality. More ghetto towers will make it worse. Doh!
61	985	Local Resident	Ron Thorp		Environment and Utilities	EU4		On a good day it's chronic. What a brilliant idea to jam a few more mega ghetto towers in to improve it.
62	992	Local Resident	Douglas Hunt		Environment and Utilities	EU1		Current plans are to widen Victoria road and to take 50% of Cerebos Gardens in order to widen the road. As part of these plans the trees currently there will all be cut down. Once the building work is complete, can the remaining 50% of Cerebos Gardens please have trees re-planted and other plants added e.g. low bushes. This will help with air pollution on a busy road, partially block out noise to the residents living in Shaftesbury Gardens and help with privacy. If the road is not widened, can bushes or other plants be added to help with air pollution.
62	993	Local Resident	Douglas Hunt		Environment and Utilities	EU2		Current plans are to widen Victoria road and to take 50% of Cerebos Gardens in order to widen the road. As part of these plans the trees currently there will all be cut down. Once the building work is complete, can the remaining 50% of Cerebos Gardens please have trees re-planted and other plants added e.g. low bushes. This will help with air pollution on a busy road, partially block out noise to the residents living in Shaftesbury Gardens and help with privacy. If the road is not widened, can bushes or other plants be added to help with air pollution
62	994	Local Resident	Douglas Hunt		Environment and Utilities	EU4		Current plans are to widen Victoria road and to take 50% of Cerebos Gardens in order to widen the road. As part of these plans the trees currently there will all be cut down. Once the building work is complete, can the remaining 50% of Cerebos Gardens please have trees re-planted and other plants added e.g. low bushes. This will help with air pollution on a busy road, partially block out noise to the residents living in Shaftesbury Gardens and help with privacy. If the road is not widened, can bushes or other plants be added to help with air pollution
62	995	Local Resident	Douglas Hunt		Environment and Utilities	EU5		Current plans are to widen Victoria road and to take 50% of Cerebos Gardens in order to widen the road. As part of these plans the trees currently there will all be cut down. Once the building work is complete, can the remaining 50% of Cerebos Gardens please have trees re-planted and other plants added e.g. low bushes. This will help with air pollution on a busy road, partially block out noise to the residents living in Shaftesbury Gardens and help with privacy. If the road is not widened, can bushes or other plants be added to help with air pollution
68	1032	Community Group	Martin Cain	Friary Park Preservation Group	Environment and Utilities	EU1		The lack of detail about monitoring to ensure continued biodiversity makes this narrative unsound
68	1033	Community Group	Martin Cain	Friary Park Preservation Group	Environment and Utilities	EU2		The lack of detail about monitoring to ensure continued biodiversity makes this narrative unsound
68	1034	Community Group	Martin Cain	Friary Park Preservation Group	Environment and Utilities	EU3		The lack of detail about monitoring to ensure continued biodiversity makes this narrative unsound
68	1035	Community Group	Martin Cain	Friary Park Preservation Group	Environment and Utilities	EU4		The lack of detail about monitoring to ensure air quality makes this narrative unsound.
68	1036	Community Group	Martin Cain	Friary Park Preservation Group	Environment and Utilities	EU5		The lack of detail about monitoring to prevent noise pollution makes this narrative unsound
68	1037	Community Group	Martin Cain	Friary Park Preservation Group	Environment and Utilities	EU6		Policy is sound (no justification provided)
68	1038	Community Group	Martin Cain	Friary Park Preservation Group	Environment and Utilities	EU7		The lack of detail about monitoring to ensure the efficacy of the circular and sharing economy makes this narrative unsound

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68	1039	Community Group	Martin Cain	Friary Park Preservation Group	Environment and Utilities	EU9		Policy is sound (no justification provided)
68	1040	Community Group	Martin Cain	Friary Park Preservation Group	Environment and Utilities	EU10		Policy is sound (no justification provided)
68	1041	Community Group	Martin Cain	Friary Park Preservation Group	Environment and Utilities	EU11		The lack of detail about smart technology makes this narrative unsound
70	1090	Local Resident	Joanna Betts		Environment and Utilities	E6		We also note that the Local Plan fails to control waste plants in the area, including PowerDay, who received record-breaking fines recently.
70	1104	Local Resident	Joanna Betts		Environment and Utilities	EU1		Wells House Road has no accessible greenspace suitable for children. We ask you to consider the options that could be included within the development. These could be located at a) the greenspace promised to us by HS2 between Wells House Road and the HS2 OOC station; b) the small area of Wormwood Scrubs on the Old Oak Common Lane side to be cleaned up and made safe and suitable for children; c) the woodland to the South of Wells House Road/
70	1110	Local Resident	Joanna Betts		Environment and Utilities	EU4		Currently the language in the policy indicates that developments should not increase noise pollution or diminish air quality, and this has been to some extent upheld in planning applications. However, the other aspect of this is that developments should not place people in areas which will damage their health through pollution, and this has not been given weight in planning determinations (notably Mitre Yard). In addition, throughout the policies, green infrastructure is seen as important in diminishing air pollution, but very little has been provided in planning applications approved to date. Policy wording could expect that no new developments take place in areas of exceedance of acceptable EU standards of maximum air and noise pollution. Stringent monitoring of each development should ensure enforcement of planning conditions (as for example conditions in 12.24 and 12.25 of Planning Officer's report on Mitre Yard – see below.
70	1111	Local Resident	Joanna Betts		Environment and Utilities	EU4		So, for example, Policy D5 Tall Buildings, requires that they: e) do not adversely impact the amenity of their surroundings in terms of: i) microclimate; ii) overshadowing and daylight and sunlight; iii) wind turbulence; iv) air quality; v) noise; vi) lighting; vii) reflected glare; And EU 4 6.52. High density development can have a significant impact on air flow and areas of pollution accumulation.! The Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) have produced guidance on managing air quality in cities that states that “wherever possible, new developments should not create a new “street canyon” or a building configuration that inhibits effective pollution dispersion”. But more is required to ensure that people are not exposed to health risks through location of tall buildings in high pollution locations Air Quality Study (Supporting Document 4) presents the following relevant policy trail: National Guidance suggests the Local Plan should consider: new developments which “Expose people to existing sources of air pollutants. This could be by building new homes, workplaces or other development in places with poor air quality.” (p. 15) And the Mayor's London Plan Policy 7.14 requires development to: “minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMA) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans (see Policy 6.3). (p. 17) Recommendation (p. 72) and the Mayor's priorities suggest that: “Developments should be designed to minimise and mitigate against increased exposure to poor air quality;” (p. 19). The relevant policy phrasing is present. A relevant form of words could be introduced to Places policies, especially where noise and air pollution levels are high, or tall buildings proposed. The following is recommended to be inserted for each local Place in the policy box: EU4 Table 6.1 AQS recommendations: Proposals should not increase the area of exceedance of EU established health-based standards and objectives for NO2 and PM10. Where new developments are introduced into an area where the standards and objectives are exceeded, developments should be designed to minimise and mitigate against increased exposure to poor air quality. In this regard, the following text is too cavalier and could be reworded: e.g. “Developments should not be encouraged in areas of pollution exceedance”. Some objective limits should be determined.
70	1112	Local Resident	Joanna Betts		Environment and Utilities	EU4		There is support for this in existing Local Plans, cited in the Air Quality Study: LBHF Borough Policy considers air quality and new developments: Requiring all major developments to provide an air quality assessment that considers the potential impacts of pollution from the development on the site and on neighbouring areas and also considers the potential for exposure to pollution levels above the Government's air quality objective concentration targets; Requiring mitigation measures to be implemented to reduce emissions, particularly of nitrogen oxides and small particles, where assessments show that developments could cause a significant worsening of local air quality or contribute to the exceedances of the Government's air quality objectives; and Requiring mitigation measures that reduce exposure to acceptable levels where developments are proposed that could result in the occupants being particularly affected by poor air quality. (p. 32)

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
								Also, the LBHF aims to: The council will have reduced road traffic generated in the borough and will wherever possible have reduced the impact of other road traffic on the local environment, particularly in terms of noise and air quality impacts. Where the council does not control the roads, for example the busy A4 and A40, the council will have worked with its partners, particularly Transport for London to achieve these aims; (p. 32) For reference the HS2 code of practice is on p. 34 of the Air Quality Study.
70	1113	Local Resident	Joanna Betts		Environment and Utilities	EU4		Other helpful forms of words are already in the text: D6 Amenity iii) are located away from and/or designed to mitigate air, light and noise polluting activities where possible. 5.49: "To support their usage, where possible, they should be positioned away from, or designed to mitigate, sources of noise and poor air quality that would make them unpleasant to use." This is reinforced in Policy EU4 Air Quality "f) designing and positioning buildings, civic and open spaces to minimise exposure to elevated levels of pollution by avoiding creating street canyons, or building configurations that inhibit effective pollution dispersion."
70	1115	Local Resident	Joanna Betts		Environment and Utilities	EU4		The Mitre Yard development is located at proposed new pollution monitoring zone at a place of high exceedances in NOx and also particulate matter is expected to be very high with waste functions. The Planning statement did not consider the air quality of the location of the development. The Air Quality Statement indicated very high pollution levels. Planning Officers' report on this case noted Air quality predictions at different Heights within the Development 1.59 The Air Quality Assessment presents data for the locations within the Development that are likely to be exposed to the worst-case air quality conditions i.e. the lowest floor levels of the Development that would be the nearest to road traffic and the highest residential levels of the Development closest to heating plant emissions. Tables B9 to B13 present predicted concentrations at various heights, representative of sensitive receptors (refer to Table 3 of the Air Quality Assessment) at different floor levels. Ground floor and roof = play spaces, public spaces, park... "The roof terraces, rear garden and balconies will be affected by road traffic and rail traffic noise and will exceed the desirable noise levels set out in BS8233:2014. However, BS8233 states that, in high noise areas, such as city centres or urban areas adjoining the strategic transport network, a compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be met might be warranted." (OPDC Planning Committee 120717, p. 69, 7.193) IN relation to air quality: "7.2.9 In terms of air quality for future residents whilst air quality standards along Scrubs lane are currently in breach of existing targets the assessment argues that future improvements to the emissions of vehicles will improve air quality standards to an acceptable level by the time the development is ready for occupation. However, LBHF EH officers have raised concerns that this might not be the case in practice and therefore mechanical ventilation may be required as part of the development in order to ensure that appropriate air quality is provided for future residents. It is recommended that this matter is resolved through the imposition of a condition on any permission requiring the submission, approval and implementation of a ventilation strategy prior to commencement of the development." P. 73, 7.219
70	1116	Local Resident	Joanna Betts		Environment and Utilities	EU4		The subsequent conditions are set requiring (1) Abatement technologies for boilers as condition (12.24) – for apartments or outside space? (2) NOx emissions standards and air pollution mitigation – in the Planning Committee discussion this seemed to refer purely to air conditioning. 12.25 PRE-COMMENCEMENT – Air Quality (Low Emissions Strategy) Prior to the commencement of the development a Low Emission Strategy shall be submitted to and approved in writing by the local planning authority. The Low Emission Strategy must address the results of the Air Quality Assessment and detail the remedial action and mitigation measures that will be implemented to protect residential receptors (e.g. abatement technology for energy plant, design solutions). This Strategy must make a commitment to implement the mitigation measures (including NOx emissions standards for the chosen energy plant) that are required to reduce the exposure of on-site and off-site local receptors to poor air quality and to help mitigate the development's air pollution impacts, in particular the emissions of NOx and particulates from on-site and off-site transport and energy generation sources. Evidence must also be submitted to and approved in writing by the local planning authority to show that the CHP and boiler units installed will comply with the relevant emissions standards in the Mayor's SPG 'Sustainable Design and Construction' (2014). Reason: To ensure the development contributes to improvements in air quality in accordance with London Plan (2016) policy 7.14 'Improving Air Quality', LBHF Regulation 18 Local Plan (2015) policy CC9 'Air Quality' and OPDC Regulation 19 Local Plan (2017) policy EU4 'Air Quality'. The pollution consequences of increased "tunneling" of tall buildings on either side of the road were not considered. Strengthening the requirement to meet acceptable air quality standards could set some expectations for (a) absolute maxima for children's play spaces and outdoor amenity spaces and (b) rigorous monitoring and (c) overall reduction of noise and air pollution to expected maxima prior to developments being inhabited
77	1191	Local Resident	Sarah Abrahart		Environment and Utilities	EU1		Policy is unsound (no justification provided)
77	1192	Local Resident	Sarah Abrahart		Environment and Utilities	EU2		Policy is unsound (no justification provided)

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
80	1214	Local Resident	Noam Leshem		Environment and Utilities	EU6		Reading your proposal I find it amazing you think a plant like Powerday can stay at its current location. At current 200 homes suffer daily for it and dealing with it is easy to ignore but add all the housing and business you are planning and it is a receipt for disaster! Considering removal of it was in the initial stages perhaps the sun/bbc will find it interesting to investigate why that has changed...
83	1272	Local Resident	Nadia Samara		Environment and Utilities	E6		We also note that the Local Plan fails to control waste plants in the area, including PowerDay, who received record-breaking fines recently.
84	1299	Local Resident	Nicholas Kasic		Environment and Utilities	E6		We also note that the Local Plan fails to control waste plants in the area, including PowerDay, who received record-breaking fines recently.
85	1326	Local Resident	Francis, Marc and Caroline Sauzier		Environment and Utilities	E6		We also note that the Local Plan fails to control waste plants in the area, including PowerDay, who received record-breaking fines recently.
85	1345	Local Resident	Francis, Marc and Caroline Sauzier		Environment and Utilities	EU4		Currently the language in the policy indicates that developments should not increase noise pollution or diminish air quality, and this has been to some extent upheld in planning applications. However, the other aspect of this is that developments should not place people in areas which will damage their health through pollution, and this has not been given weight in planning determinations (notably Mitre Yard). In addition, throughout the policies, green infrastructure is seen as important in diminishing air pollution, but very little has been provided in planning applications approved to date. Policy wording could expect that no new developments take place in areas of exceedance of acceptable EU standards of maximum air and noise pollution. Stringent monitoring of each development should ensure enforcement of planning conditions (as for example conditions in 12.24 and 12.25 of Planning Officer's report on Mitre Yard – see below).
85	1346	Local Resident	Francis, Marc and Caroline Sauzier		Environment and Utilities	EU4		So, for example, Policy D5 Tall Buildings, requires that they: e) do not adversely impact the amenity of their surroundings in terms of: i) microclimate; ii) overshadowing and daylight and sunlight; iii) wind turbulence; iv) air quality; v) noise; vi) lighting; vii) reflected glare; And EU 4 6.52. High density development can have a significant impact on air flow and areas of pollution accumulation. The Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) have produced guidance on managing air quality in cities that states that “wherever possible, new developments should not create a new “street canyon” or a building configuration that inhibits effective pollution dispersion”. But more is required to ensure that people are not exposed to health risks through location of tall buildings in high pollution locations Air Quality Study (Supporting Document 4) presents the following relevant policy trail: National Guidance suggests the Local Plan should consider: new developments which “Expose people to existing sources of air pollutants. This could be by building new homes, workplaces or other development in places with poor air quality.” (p. 15) And the Mayor's London Plan Policy 7.14 requires development to: “minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMA) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans (see Policy 6.3). (p. 17) Recommendation (p. 72) and the Mayor's priorities suggest that: “Developments should be designed to minimise and mitigate against increased exposure to poor air quality,” (p. 19). The relevant policy phrasing is present. A relevant form of words could be introduced to Places policies, especially where noise and air pollution levels are high, or tall buildings proposed. The following is recommended to be inserted for each local Place in the policy box: EU4 Table 6.1 AQS recommendations: Proposals should not increase the area of exceedance of EU established health-based standards and objectives for NO2 and PM10. Where new developments are introduced into an area where the standards and objectives are exceeded, developments should be designed to minimise and mitigate against increased exposure to poor air quality. In this regard, the following text is too cavalier and could be reworded: e.g. “Developments should not be encouraged in areas of pollution exceedance”. Some objective limits should be determined.
85	1347	Local Resident	Francis, Marc and Caroline Sauzier		Environment and Utilities	EU4		There is support for this in existing Local Plans, cited in the Air Quality Study: LBHF Borough Policy considers air quality and new developments: Requiring all major developments to provide an air quality assessment that considers the potential impacts of pollution from the development on the site and on neighbouring areas and also considers the potential for exposure to pollution levels above the Government's air quality objective concentration targets; Requiring mitigation measures to be implemented to reduce emissions, particularly of nitrogen oxides and small particles, where assessments show that developments could cause a significant worsening of local air quality or contribute to the exceedances of the Government's air quality objectives; and Requiring mitigation measures that reduce exposure to acceptable levels where developments are proposed that could result in the occupants being particularly affected by poor air quality. (p. 32) Also, the LBHF aims to: The council will have reduced road traffic generated in the borough and will wherever possible have reduced the impact of other road traffic on the local environment, particularly in terms of noise and air quality impacts. Where the council does not control the roads, for example the busy A4 and A40, the council will have worked with its partners, particularly Transport for London to achieve these aims; (p. 32) For reference the HS2 code of practice is on p. 34 of the Air Quality Study.

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
85	1348	Local Resident	Francis, Marc and Caroline Sauzier		Environment and Utilities	EU4		Other helpful forms of words are already in the text: D6 Amenity iii) are located away from and/or designed to mitigate air, light and noise polluting activities where possible. 5.49: "To support their usage, where possible, they should be positioned away from, or designed to mitigate, sources of noise and poor air quality that would make them unpleasant to use." This is reinforced in Policy EU4 Air Quality "f) designing and positioning buildings, civic and open spaces to minimise exposure to elevated levels of pollution by avoiding creating street canyons, or building configurations that inhibit effective pollution dispersion."
85	1350	Local Resident	Francis, Marc and Caroline Sauzier		Environment and Utilities	EU4		The Mitre Yard development is located at proposed new pollution monitoring zone at a place of high exceedances in NOx and also particulate matter is expected to be very high with waste functions. The Planning statement did not consider the air quality of the location of the development. The Air Quality Statement indicated very high pollution levels. Planning Officers' report on this case noted Air quality predictions at different Heights within the Development 1.59 The Air Quality Assessment presents data for the locations within the Development that are likely to be exposed to the worst-case air quality conditions i.e. the lowest floor levels of the Development that would be the nearest to road traffic and the highest residential levels of the Development closest to heating plant emissions. Tables B9 to B13 present predicted concentrations at various heights, representative of sensitive receptors (refer to Table 3 of the Air Quality Assessment) at different floor levels. Ground floor and roof = play spaces, public spaces, park... "The roof terraces, rear garden and balconies will be affected by road traffic and rail traffic noise and will exceed the desirable noise levels set out in BS8233:2014. However, BS8233 states that, in high noise areas, such as city centres or urban areas adjoining the strategic transport network, a compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be met might be warranted." (OPDC Planning Committee 120717, p. 69, 7.193) IN relation to air quality: "7.2.9 In terms of air quality for future residents whilst air quality standards along Scrubs lane are currently in breach of existing targets the assessment argues that future improvements to the emissions of vehicles will improve air quality standards to an acceptable level by the time the development is ready for occupation. However, LBHF EH officers have raised concerns that this might not be the case in practice and therefore mechanical ventilation may be required as part of the development in order to ensure that appropriate air quality is provided for future residents. It is recommended that this matter is resolved through the imposition of a condition on any permission requiring the submission, approval and implementation of a ventilation strategy prior to commencement of the development." P. 73, 7.219
85	1351	Local Resident	Francis, Marc and Caroline Sauzier		Environment and Utilities	EU4		The subsequent conditions are set requiring (1) Abatement technologies for boilers as condition (12.24) – for apartments or outside space? (2) NOx emissions standards and air pollution mitigation – in the Planning Committee discussion this seemed to refer purely to air conditioning. 12.25 PRE-COMMENCEMENT – Air Quality (Low Emissions Strategy) Prior to the commencement of the development a Low Emission Strategy shall be submitted to and approved in writing by the local planning authority. The Low Emission Strategy must address the results of the Air Quality Assessment and detail the remedial action and mitigation measures that will be implemented to protect residential receptors (e.g. abatement technology for energy plant, design solutions). This Strategy must make a commitment to implement the mitigation measures (including NOx emissions standards for the chosen energy plant) that are required to reduce the exposure of on-site and off-site local receptors to poor air quality and to help mitigate the development's air pollution impacts, in particular the emissions of NOx and particulates from on-site and off-site transport and energy generation sources. Evidence must also be submitted to and approved in writing by the local planning authority to show that the CHP and boiler units installed will comply with the relevant emissions standards in the Mayor's SPG 'Sustainable Design and Construction' (2014). Reason: To ensure the development contributes to improvements in air quality in accordance with London Plan (2016) policy 7.14 'Improving Air Quality', LBHF Regulation 18 Local Plan (2015) policy CC9 'Air Quality' and OPDC Regulation 19 Local Plan (2017) policy EU4 'Air Quality'. The pollution consequences of increased "tunneling" of tall buildings on either side of the road were not considered. Strengthening the requirement to meet acceptable air quality standards could set some expectations for (a) absolute maxima for children's play spaces and outdoor amenity spaces and (b) rigorous monitoring and (c) overall reduction of noise and air pollution to expected maxima prior to developments being inhabited
87	1373	Local Resident	Patrick Munroe		Environment and Utilities	E6		We also note that the Local Plan fails to control waste plants in the area, including PowerDay, who received record-breaking fines recently.
88	1400	Local Resident	Lily Gray		Environment and Utilities	E6		We also note that the Local Plan fails to control waste plants in the area, including PowerDay, who received record-breaking fines recently.
88	1419	Local Resident	Lily Gray		Environment and Utilities	EU4		Currently the language in the policy indicates that developments should not increase noise pollution or diminish air quality, and this has been to some extent upheld in planning applications. However, the other aspect of this is that developments should not place people in areas which will damage their health through pollution, and this has not been given weight in planning determinations (notably Mitre Yard). In addition, throughout the policies, green infrastructure is seen as important in diminishing air pollution, but very little has been provided in planning applications approved to date. Policy wording could expect that no new developments take place in areas of exceedance of acceptable EU standards of maximum air and

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								noise pollution. Stringent monitoring of each development should ensure enforcement of planning conditions (as for example conditions in 12.24 and 12.25 of Planning Officer's report on Mitre Yard – see below.
88	1420	Local Resident	Lily Gray		Environment and Utilities	EU4		So, for example, Policy D5 Tall Buildings, requires that they: e) do not adversely impact the amenity of their surroundings in terms of: i) microclimate; ii) overshadowing and daylight and sunlight; iii) wind turbulence; iv) air quality; v) noise; vi) lighting; vii) reflected glare; And EU 4 6.52. High density development can have a significant impact on air flow and areas of pollution accumulation.! The Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) have produced guidance on managing air quality in cities that states that “wherever possible, new developments should not create a new “street canyon” or a building configuration that inhibits effective pollution dispersion”. But more is required to ensure that people are not exposed to health risks through location of tall buildings in high pollution locations Air Quality Study (Supporting Document 4) presents the following relevant policy trail: National Guidance suggests the Local Plan should consider: new developments which “Expose people to existing sources of air pollutants. This could be by building new homes, workplaces or other development in places with poor air quality.” (p. 15) And the Mayor's London Plan Policy 7.14 requires development to: “minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans (see Policy 6.3). (p. 17) Recommendation (p. 72) and the Mayor's priorities suggest that: “Developments should be designed to minimise and mitigate against increased exposure to poor air quality;” (p. 19). The relevant policy phrasing is present. A relevant form of words could be introduced to Places policies, especially where noise and air pollution levels are high, or tall buildings proposed. The following is recommended to be inserted for each local Place in the policy box: EU4 Table 6.1 AQS recommendations: Proposals should not increase the area of exceedance of EU established health-based standards and objectives for NO2 and PM10. Where new developments are introduced into an area where the standards and objectives are exceeded, developments should be designed to minimise and mitigate against increased exposure to poor air quality. In this regard, the following text is too cavalier and could be reworded: e.g. “Developments should not be encouraged in areas of pollution exceedance”. Some objective limits should be determined.
88	1421	Local Resident	Lily Gray		Environment and Utilities	EU4		There is support for this in existing Local Plans, cited in the Air Quality Study: LBHF Borough Policy considers air quality and new developments: Requiring all major developments to provide an air quality assessment that considers the potential impacts of pollution from the development on the site and on neighbouring areas and also considers the potential for exposure to pollution levels above the Government's air quality objective concentration targets; Requiring mitigation measures to be implemented to reduce emissions, particularly of nitrogen oxides and small particles, where assessments show that developments could cause a significant worsening of local air quality or contribute to the exceedances of the Government's air quality objectives; and Requiring mitigation measures that reduce exposure to acceptable levels where developments are proposed that could result in the occupants being particularly affected by poor air quality. (p. 32) Also, the LBHF aims to: The council will have reduced road traffic generated in the borough and will wherever possible have reduced the impact of other road traffic on the local environment, particularly in terms of noise and air quality impacts. Where the council does not control the roads, for example the busy A4 and A40, the council will have worked with its partners, particularly Transport for London to achieve these aims; (p., 32) For reference the HS2 code of practice is on p. 34 of the Air Quality Study.
88	1422	Local Resident	Lily Gray		Environment and Utilities	EU4		Other helpful forms of words are already in the text: D6 Amenity iii) are located away from and/or designed to mitigate air, light and noise polluting activities where possible. 5.49: "To support their usage, where possible, they should be positioned away from, or designed to mitigate, sources of noise and poor air quality that would make them unpleasant to use." This is reinforced in Policy EU4 Air Quality "f) designing and positioning buildings, civic and open spaces to minimise exposure to elevated levels of pollution by avoiding creating street canyons, or building configurations that inhibit effective pollution dispersion."
88	1424	Local Resident	Lily Gray		Environment and Utilities	EU4		The Mitre Yard development is located at proposed new pollution monitoring zone at a place of high exceedances in NOx and also particulate matter is expected to be very high with waste functions. The Planning statement did not consider the air quality of the location of the development. The Air Quality Statement indicated very high pollution levels. Planning Officers' report on this case noted Air quality predictions at different Heights within the Development 1.59 The Air Quality Assessment presents data for the locations within the Development that are likely to be exposed to the worst-case air quality conditions i.e. the lowest floor levels of the Development that would be the nearest to road traffic and the highest residential levels of the Development closest to heating plant emissions. Tables B9 to B13 present predicted concentrations at various heights, representative of sensitive receptors (refer to Table 3 of the Air Quality Assessment) at different floor levels.

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								Ground floor and roof = play spaces, public spaces, park... “The roof terraces, rear garden and balconies will be affected by road traffic and rail traffic noise and will exceed the desirable noise levels set out in BS8233:2014. However, BS8233 states that, in high noise areas, such as city centres or urban areas adjoining the strategic transport network, a compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be met might be warranted.” (OPDC Planning Committee 120717, p. 69, 7.193) IN relation to air quality: “7.2.9 In terms of air quality for future residents whilst air quality standards along Scrubs lane are currently in breach of existing targets the assessment argues that future improvements to the emissions of vehicles will improve air quality standards to an acceptable level by the time the development is ready for occupation. However, LBHF EH officers have raised concerns that this might not be the case in practice and therefore mechanical ventilation may be required as part of the development in order to ensure that appropriate air quality is provided for future residents. It is recommended that this matter is resolved through the imposition of a condition on any permission requiring the submission, approval and implementation of a ventilation strategy prior to commencement of the development.” P. 73, 7.219
88	1425	Local Resident	Lily Gray		Environment and Utilities	EU4		The subsequent conditions are set requiring (1) Abatement technologies for boilers as condition (12.24) – for apartments or outside space? (2) NOx emissions standards and air pollution mitigation – in the Planning Committee discussion this seemed to refer purely to air conditioning. 12.25 PRE-COMMENCEMENT – Air Quality (Low Emissions Strategy) Prior to the commencement of the development a Low Emission Strategy shall be submitted to and approved in writing by the local planning authority. The Low Emission Strategy must address the results of the Air Quality Assessment and detail the remedial action and mitigation measures that will be implemented to protect residential receptors (e.g. abatement technology for energy plant, design solutions). This Strategy must make a commitment to implement the mitigation measures (including NOx emissions standards for the chosen energy plant) that are required to reduce the exposure of on-site and off-site local receptors to poor air quality and to help mitigate the development's air pollution impacts, in particular the emissions of NOx and particulates from on-site and off-site transport and energy generation sources. Evidence must also be submitted to and approved in writing by the local planning authority to show that the CHP and boiler units installed will comply with the relevant emissions standards in the Mayor's SPG 'Sustainable Design and Construction' (2014). Reason: To ensure the development contributes to improvements in air quality in accordance with London Plan (2016) policy 7.14 'Improving Air Quality', LBHF Regulation 18 Local Plan (2015) policy CC9 'Air Quality' and OPDC Regulation 19 Local Plan (2017) policy EU4 'Air Quality'. The pollution consequences of increased “tunneling” of tall buildings on either side of the road were not considered. Strengthening the requirement to meet acceptable air quality standards could set some expectations for (a) absolute maxima for children's play spaces and outdoor amenity spaces and (b) rigorous monitoring and (c) overall reduction of noise and air pollution to expected maxima prior to developments being inhabited
89	1438	Local Resident	Nicky Guymer		Environment and Utilities	EU6	6.3	TITRA objects to Policy EU6 on waste which commits to complying with the West London Waste Plan and safeguarding the waste sites in the Channel Gate 'Place' and Powerday at Old Oak Siding. Residents have suffered for decades from dust, noise and particulate pollution from the Euroterminal's waste disposal and railway maintenance sites and want controls in line with environmental protection legislation. TITRA's residents wish to see far greater emphasis on waste disposed of at source by Park Royal and Old Oak's industrial sites, in accordance with the London Plan's policies. We believe strongly that industrial site owners should not be allowed to regard Old Oak's ring of waste sites as a catch-all for their failure to invest in 'circular economy' thinking and 'at source' disposal processes.
89	1439	Local Resident	Nicky Guymer		Environment and Utilities	EU6	6.3	TITRA objects very strongly to Policy EU6 (6.3, p175) seeking to safeguard the Powerday site for meeting the area's waste needs under the London Plan. As TITRA residents are still continually troubled by odours/dust from Powerday (the company received a UK-record £1 million fine for non-compliance with environmental legislation in 2016), it's clear that the company is incapable of complying with environmental legislation so it can operate in this residential area. This fundamental mistake will be compounded as the plan's 25,000 homes are added: the OPDC risks having thousands of residents suffering health issues and pollution in the future, rather than the 'mere hundreds' troubled by them now.
89	1440	Local Resident	Nicky Guymer		Environment and Utilities	EU6		TITRA objects very strongly to Policy EU6, envisaging Powerday becoming an energy/CHP site in future; this Local Plan should follow its own/the London Plan's logic and require industrial sites deal with their own output, site by site.
89	1441	Local Resident	Nicky Guymer		Environment and Utilities	EU6		TITRA regards Policy EU6, calling for 95% of construction waste to go to landfill or be handled in a secondary materials market involving developers, as unrealistic. It is also harmful, given the inability of local waste sites like Powerday and Quattro to control pollution like dust and odours and worse, the regular dumping of waste material by rogue builders and smaller contractors that will often be part of developers' supply chains. TITRA supports the aspiration but states that the OPDC, developers and waste firms will have to be far more imaginative in addressing this challenge and they along with the Environment Agency and local boroughs' Environmental health departments will have to commit resources to policing this activity in the future.
89	1442	Local Resident	Nicky Guymer		Environment and Utilities	EU4		TITRA welcomes Air Quality Policy EU4's recognition of serious air pollution OPDC area which is a continual and growing worry for local residents. TITRA requests an extra policy, EU4i), requiring that all major developments' planning permissions use low emission vehicles during construction.
89	1444	Local Resident	Nicky Guymer		Environment and Utilities	EU6		TITRA believes that Policy EU6 encouraging higher recycling from new housing is weak and ineffective. Paragraph 6.87 can talk vaguely of “innovation in communal waste collection facilities” and “developers will need to provide residents with appropriate details on how to make best use of their waste collection and storage infrastructure”. TITRA residents' lives are already blighted by inadequate waste collection and failure of landlords to invest in recycling measures unless

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								pressured to do so by local residents. We think the Local Plan needs to place full responsibility on developers to find smarter ways to manage domestic waste removal and new ideas for recycling and build these measures into planning approvals.
91	1470	Local Resident	Bruce Stevenson		Environment and Utilities	EU6	6.3	TITRA objects to Policy EU6 on waste which commits to complying with the West London Waste Plan and safeguarding the waste sites in the Channel Gate 'Place' and Powerday at Old Oak Siding. Residents have suffered for decades from dust, noise and particulate pollution from the Euroterminal's waste disposal and railway maintenance sites and want controls in line with environmental protection legislation. TITRA's residents wish to see far greater emphasis on waste disposed of at source by Park Royal and Old Oak's industrial sites, in accordance with the London Plan's policies. We believe strongly that industrial site owners should not be allowed to regard Old Oak's ring of waste sites as a catch-all for their failure to invest in 'circular economy' thinking and 'at source' disposal processes.
91	1471	Local Resident	Bruce Stevenson		Environment and Utilities	EU6	6.3	TITRA objects very strongly to Policy EU6 (6.3, p175) seeking to safeguard the Powerday site for meeting the area's waste needs under the London Plan. As TITRA residents are still continually troubled by odours/dust from Powerday (the company received a UK-record £1 million fine for non-compliance with environmental legislation in 2016), it's clear that the company is incapable of complying with environmental legislation so it can operate in this residential area. This fundamental mistake will be compounded as the plan's 25,000 homes are added: the OPDC risks having thousands of residents suffering health issues and pollution in the future, rather than the 'mere hundreds' troubled by them now.
91	1472	Local Resident	Bruce Stevenson		Environment and Utilities	EU6		TITRA objects very strongly to Policy EU6, envisaging Powerday becoming an energy/CHP site in future; this Local Plan should follow its own/the London Plan's logic and require industrial sites deal with their own output, site by site.
91	1473	Local Resident	Bruce Stevenson		Environment and Utilities	EU6		TITRA regards Policy EU6, calling for 95% of construction waste to go to landfill or be handled in a secondary materials market involving developers, as unrealistic. It is also harmful, given the inability of local waste sites like Powerday and Quattro to control pollution like dust and odours and worse, the regular dumping of waste material by rogue builders and smaller contractors that will often be part of developers' supply chains. TITRA supports the aspiration but states that the OPDC, developers and waste firms will have to be far more imaginative in addressing this challenge and they along with the Environment Agency and local boroughs' Environmental health departments will have to commit resources to policing this activity in the future.
91	1474	Local Resident	Bruce Stevenson		Environment and Utilities	EU4		TITRA welcomes Air Quality Policy EU4's recognition of serious air pollution OPDC area which is a continual and growing worry for local residents. TITRA requests an extra policy, EU4i), requiring that all major developments' planning permissions use low emission vehicles during construction.
91	1476	Local Resident	Bruce Stevenson		Environment and Utilities	EU6		TITRA believes that Policy EU6 encouraging higher recycling from new housing is weak and ineffective. Paragraph 6.87 can talk vaguely of "innovation in communal waste collection facilities" and "developers will need to provide residents with appropriate details on how to make best use of their waste collection and storage infrastructure". TITRA residents' lives are already blighted by inadequate waste collection and failure of landlords to invest in recycling measures unless pressured to do so by local residents. We think the Local Plan needs to place full responsibility on developers to find smarter ways to manage domestic waste removal and new ideas for recycling and build these measures into planning approvals.
92	1535	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU1	6.19	We would support encouragement of community management of Open Spaces.
92	1600	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU1		We believe that it is most important to provide a variety of Open Spaces and where these relate to residential areas, residents need to be part of them and feel a sense of ownership.
92	1602	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU1		EU1 – Open Spaces: We broadly support the proposals and ambitions set out in this chapter of the Plan with the following comments and reservations. We have set our main comments relative to this section under SP8 – Green Spaces and under P12 – Wormwood Scrubs.
92	1603	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU1		Under para.6.9 a reference should be included that Wormwood Scrubs derives its protection as MOL from Act of Parliament but the ownership and management are through the London Borough of Hammersmith and Fulham.
92	1604	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU1		We would be concerned if developers were allowed to mis-use the provisions of Para. 6.14 whereby they could obviate their responsibilities to contribute to the overall quota of Open Space.
92	1605	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU2		EU2 – Urban Greening and Biodiversity: We very much encourage these policies recognising both the difficulties and the importance in such an urban area.
92	1606	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU2		More value should be placed on the importance of Tree planting – quantity and species. We commend the guidance provided in "Trees in Hard Landscapes : A Guide for Delivery" published by Trees and Design Action Group 2014. We would expect that street trees will be planted where and whenever possible : Developers should be required from the outset to provide evidence that there is a clear hierarchy between the provision and routes for services and the provision of trees.
92	1607	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU2		Allotments – temporary and permanent – should be encouraged generally. For example, temporary allotments at Kings Cross - an early win – were in skips or containers so could be moved as development happened.
92	1608	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities			Lighting of streets and public spaces : This chapter should also address policies to limit light pollution. The effects of light from multiple tall towers will be detrimental to amenity in surrounding areas, and to wildlife and amenity on Wormwood Scrubs.
92	1609	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU2		There should be temporary greening during the construction phases.

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92	1610	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU3		EU3 – Water: SUDS and water attenuation schemes : The Policy should include extra points to ensure that planning and sufficient attenuation measures are in place to avoid flash storm flooding and to “ensure sustainable drainage over the whole development area does not adversely affect Wormwood Scrubs, and takes measure to avoid flooding”. Reason : Wormwood Scrubs will be vulnerable to run-off and other water consequences of new development unless attenuation measures are put in place at early planning stages.
92	1611	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU3		We would also expect this chapter to include the potential for using canal water for heating and cooling of buildings. See also section on the canal.
92	1612	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU3		As the highway authority and development agency, the OPDC will similarly be responsible to ensure that there is accurate mapping of utilities across the area.
92	1613	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU4		EU4 - Air Quality: This is becoming an increasing public concern in urban areas. We support the policy and supporting text but query who will be the controlling and monitoring bodies.
92	1614	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU5		EU5 - Noise and vibration: We are pleased to note that Vibration been added to this section as we requested in our previous submission. As above, we question who are the controlling and monitoring bodies? Ie. OPDC or LAs?
92	1615	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU6		EU6 – Waste: We support the policy and supporting text. However, the division between responsibilities between OPDC and the Local Authorities in the short and long term should be made clear.
92	1616	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU7		EU7 – Circular and Sharing Economy: We welcome the introduction of this new policy which will contribute to improved sustainability within the OPDC area.
92	1617	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU8		EU8 – Sustainable materials: We support the objectives set out in this policy. Attention will need to be given in this respect to the outcomes of the various inquiries currently underway in the wake of the Grenfell fire disaster
92	1618	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU9		The last draft of the Plan included Table 13: Environmental sustainability targets for the OPDC area : We recommend that this is reinstated in the current Draft. Add reference to the embodied carbon/energy in buildings. This is particularly relevant when considering whether an existing building can be converted rather demolished and replaced.
92	1619	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU10		EU10 – Energy Systems: Again we support the principles and objectives set out in this policy. However, in our experience developers are notoriously reluctant to be cooperative on projects involving district energy generating and distribution, so it will be incumbent on OPDC to assist with the manage this process, which may necessitate some forms of incentives.
92	1620	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU11		EU11 – Smart Technology: The encouragement of smart technology should sit well with the background and heritage of Old Oak and Park Royal as industrial powerhouses. Consideration must be given at an early stage as to the ownership, management and storage of data.
92	1621	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU12		EU12 – Extraction of Minerals: We support this policy where it becomes relevant.
92	1622	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU13		EU13: Land Contamination: We have already touched on our concerns above under ‘Infrastructure and the Funding Gap’. We were surprised to learn recently that there has not been a comprehensive assessment of the potential extent of the land contamination. Now that it is confirmed that all the public land ownership will be transferred across to OPDC, they must instigate a thorough assessment of the extent and costs as a priority. (in accordance with the Environmental Protection Act 1990 : Part 2A : Contaminated Land – Statutory Guidance). As stated previously, until such time as these matters are resolved, the Plan as a whole must be regarded as unsound.
92	1664	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU9		Housing schemes should aim to be highly efficient in their use of energy and should aim for zero carbon emissions in use. This can be achieved in part by the use of green roofs, pv panels and solar panels.
92	1665	Community Group	Tom Ryland	Hammersmith Society	Environment and Utilities	EU1		All units should have private amenity space and have access to adjacent open space.
93	1748	Residents Association		Wells House Road Residents Association	Environment and Utilities	E6		We also note that the Local Plan fails to control waste plants in the area, including PowerDay, who received record-breaking fines recently.
93	1763	Residents Association		Wells House Road Residents Association	Environment and Utilities	EU1		Wells House Road has no accessible greenspace suitable for children. We ask you to consider the options that could be included within the development. These could be located at a) the greenspace promised to us by HS2 between Wells House Road and the HS2 OOC station; b) the small area of Wormwood Scrubs on the Old Oak Common Lane side to be cleaned up and made safe and suitable for children; c) the woodland to the South of Wells House Road/
93	1768	Residents Association		Wells House Road Residents Association	Environment and Utilities	EU4		Currently the language in the policy indicates that developments should not increase noise pollution or diminish air quality, and this has been to some extent upheld in planning applications. However, the other aspect of this is that developments should not place people in areas which will damage their health through pollution, and this has not been given weight in planning determinations (notably Mitre Yard). In

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								addition, throughout the policies, green infrastructure is seen as important in diminishing air pollution, but very little has been provided in planning applications approved to date. Policy wording could expect that no new developments take place in areas of exceedance of acceptable EU standards of maximum air and noise pollution. Stringent monitoring of each development should ensure enforcement of planning conditions (as for example conditions in 12.24 and 12.25 of Planning Officer's report on Mitre Yard – see below.
93	1769	Residents Association		Wells House Road Residents Association	Environment and Utilities	EU4		So, for example, Policy D5 Tall Buildings, requires that they: e) do not adversely impact the amenity of their surroundings in terms of: i) microclimate; ii) overshadowing and daylight and sunlight; iii) wind turbulence; iv) air quality; v) noise; vi) lighting; vii) reflected glare; And EU 4 6.52. High density development can have a significant impact on air flow and areas of pollution accumulation.! The Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) have produced guidance on managing air quality in cities that states that “wherever possible, new developments should not create a new “street canyon” or a building configuration that inhibits effective pollution dispersion”. But more is required to ensure that people are not exposed to health risks through location of tall buildings in high pollution locations Air Quality Study (Supporting Document 4) presents the following relevant policy trail: National Guidance suggests the Local Plan should consider: new developments which “Expose people to existing sources of air pollutants. This could be by building new homes, workplaces or other development in places with poor air quality.” (p. 15) And the Mayor's London Plan Policy 7.14 requires development to: “minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMA) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans (see Policy 6.3). (p. 17) Recommendation (p. 72) and the Mayor's priorities suggest that: “Developments should be designed to minimise and mitigate against increased exposure to poor air quality,” (p. 19). The relevant policy phrasing is present. A relevant form of words could be introduced to Places policies, especially where noise and air pollution levels are high, or tall buildings proposed. The following is recommended to be inserted for each local Place in the policy box: EU4 Table 6.1 AQS recommendations: Proposals should not increase the area of exceedance of EU established health-based standards and objectives for NO2 and PM10. Where new developments are introduced into an area where the standards and objectives are exceeded, developments should be designed to minimise and mitigate against increased exposure to poor air quality. In this regard, the following text is too cavalier and could be reworded: e.g. “Developments should not be encouraged in areas of pollution exceedance”. Some objective limits should be determined.
93	1770	Residents Association		Wells House Road Residents Association	Environment and Utilities	EU4		There is support for this in existing Local Plans, cited in the Air Quality Study: LBHF Borough Policy considers air quality and new developments: Requiring all major developments to provide an air quality assessment that considers the potential impacts of pollution from the development on the site and on neighbouring areas and also considers the potential for exposure to pollution levels above the Government's air quality objective concentration targets; Requiring mitigation measures to be implemented to reduce emissions, particularly of nitrogen oxides and small particles, where assessments show that developments could cause a significant worsening of local air quality or contribute to the exceedances of the Government's air quality objectives; and Requiring mitigation measures that reduce exposure to acceptable levels where developments are proposed that could result in the occupants being particularly affected by poor air quality. (p. 32) Also, the LBHF aims to: The council will have reduced road traffic generated in the borough and will wherever possible have reduced the impact of other road traffic on the local environment, particularly in terms of noise and air quality impacts. Where the council does not control the roads, for example the busy A4 and A40, the council will have worked with its partners, particularly Transport for London to achieve these aims; (p., 32) For reference the HS2 code of practice is on p. 34 of the Air Quality Study.
93	1771	Residents Association		Wells House Road Residents Association	Environment and Utilities	EU4		Other helpful forms of words are already in the text: D6 Amenity iii) are located away from and/or designed to mitigate air, light and noise polluting activities where possible. 5.49: "To support their usage, where possible, they should be positioned away from, or designed to mitigate, sources of noise and poor air quality that would make them unpleasant to use." This is reinforced in Policy EU4 Air Quality "f) designing and positioning buildings, civic and open spaces to minimise exposure to elevated levels of pollution by avoiding creating street canyons, or building configurations that inhibit effective pollution dispersion."
93	1773	Residents Association		Wells House Road Residents Association	Environment and Utilities	EU4		The Mitre Yard development is located at proposed new pollution monitoring zone at a place of high exceedances in NOx and also particulate matter is expected to be very high with waste functions. The Planning statement did not consider the air quality of the location of the development. The Air Quality Statement indicated very high pollution levels. Planning Officers' report on this case noted Air quality predictions at different Heights within the Development 1.59 The Air Quality Assessment presents data for the locations within the Development that are likely to be exposed to the worst-case air

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
								quality conditions i.e. the lowest floor levels of the Development that would be the nearest to road traffic and the highest residential levels of the Development closest to heating plant emissions. Tables B9 to B13 present predicted concentrations at various heights, representative of sensitive receptors (refer to Table 3 of the Air Quality Assessment) at different floor levels. Ground floor and roof = play spaces, public spaces, park... "The roof terraces, rear garden and balconies will be affected by road traffic and rail traffic noise and will exceed the desirable noise levels set out in BS8233:2014. However, BS8233 states that, in high noise areas, such as city centres or urban areas adjoining the strategic transport network, a compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be met might be warranted." (OPDC Planning Committee 120717, p. 69, 7.193) IN relation to air quality: "7.2.9 In terms of air quality for future residents whilst air quality standards along Scrubs lane are currently in breach of existing targets the assessment argues that future improvements to the emissions of vehicles will improve air quality standards to an acceptable level by the time the development is ready for occupation. However, LBHF EH officers have raised concerns that this might not be the case in practice and therefore mechanical ventilation may be required as part of the development in order to ensure that appropriate air quality is provided for future residents. It is recommended that this matter is resolved through the imposition of a condition on any permission requiring the submission, approval and implementation of a ventilation strategy prior to commencement of the development." P. 73, 7.219
93	1774	Residents Association		Wells House Road Residents Association	Environment and Utilities	EU4		The subsequent conditions are set requiring (1) Abatement technologies for boilers as condition (12.24) – for apartments or outside space? (2) NOx emissions standards and air pollution mitigation – in the Planning Committee discussion this seemed to refer purely to air conditioning. 12.25 PRE-COMMENCEMENT – Air Quality (Low Emissions Strategy) Prior to the commencement of the development a Low Emission Strategy shall be submitted to and approved in writing by the local planning authority. The Low Emission Strategy must address the results of the Air Quality Assessment and detail the remedial action and mitigation measures that will be implemented to protect residential receptors (e.g. abatement technology for energy plant, design solutions). This Strategy must make a commitment to implement the mitigation measures (including NOx emissions standards for the chosen energy plant) that are required to reduce the exposure of on-site and off-site local receptors to poor air quality and to help mitigate the development's air pollution impacts, in particular the emissions of NOx and particulates from on-site and off-site transport and energy generation sources. Evidence must also be submitted to and approved in writing by the local planning authority to show that the CHP and boiler units installed will comply with the relevant emissions standards in the Mayor's SPG 'Sustainable Design and Construction' (2014). Reason: To ensure the development contributes to improvements in air quality in accordance with London Plan (2016) policy 7.14 'Improving Air Quality', LBHF Regulation 18 Local Plan (2015) policy CC9 'Air Quality' and OPDC Regulation 19 Local Plan (2017) policy EU4 'Air Quality'. The pollution consequences of increased "tunneling" of tall buildings on either side of the road were not considered. Strengthening the requirement to meet acceptable air quality standards could set some expectations for (a) absolute maxima for children's play spaces and outdoor amenity spaces and (b) rigorous monitoring and (c) overall reduction of noise and air pollution to expected maxima prior to developments being inhabited
94	1778	Local Resident	Oonagh Heron		Environment and Utilities	EU6	6.87	New housing waste: This summer's plague of flies (inspected by Ealing Council's pest control officer) has been exacerbated by residents' failure to grasp or comply with revised collections and excessive levels of fly tipping combined by being sandwiched between waste sites. The local areas by me with communal waste collection facilities readily demonstrate how ineffectual they are. These large wheelie bins are frequently overflowing as it is (photos available as evidence) and extra waste gets dumped next to them, so Paragraph 6.87 is not good enough and such vagueness will contribute further to our problems.
94	1781	Local Resident	Oonagh Heron		Environment and Utilities	EU6		Waste sites: Bearing in mind that Powerday was fined only in 2016 and there have been years' of issues around smell and air quality, I object wholeheartedly to that site being safeguarded or to becoming an energy/CHP site. If there are problems now, how much bigger will those problems be with an additional 24,000 local homes. Preventing health-related issues for the next generation of children will be better than finding out 20 years later that pollution has irreparably harmed them.
95	1794	Local Resident	Mark Walker		Environment and Utilities	EU6	6.3	I object vehemently to Policy EU6 on waste which commits to safeguarding the waste sites in the Channel Gate 'Place' and Powerday at Old Oak Sidings. Residents have suffered for decades from dust, noise and particulate pollution from the Euroterminal's waste disposal and railway maintenance sites and I want controls in line with environmental protection legislation. I want a far greater emphasis in this Plan on waste disposal at source by Park Royal and Old Oak's industrial sites, as required by the London Plan. I think industrial site owners should not be allowed to regard Old Oak's ring of waste sites as a "safety net" – letting them avoid investment in 'circular economy' thinking and 'at source' disposal processes
95	1795	Local Resident	Mark Walker		Environment and Utilities	EU6	6.3	I object vehemently to Policy EU6 (6.3, p175) seeking to safeguard the Powerday site for meeting the area's waste needs under the London Plan. As TITRA residents are still continually troubled by odours/dust from Powerday (the company received a UK-record £1 million fine for non-compliance with environmental legislation in 2016), this company is incapable of complying with environmental legislation so it should not operate in this residential area. The health problems caused by Powerday goes on – it is not limited to the time when the EA prosecuted it. By safeguarding Powerday, the Plan risks having thousands of residents suffering health issues and pollution, rather than the 'mere' hundreds troubled by these issues now.
95	1796	Local Resident	Mark Walker		Environment and Utilities	EU6		I object very strongly to Policy EU6, envisaging Powerday being an energy/CHP site in future; this Local Plan should follow the London Plan's logic and make dirty sites deal with their own output.

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95	1797	Local Resident	Mark Walker		Environment and Utilities	EU6		I think Policy EU6 - calling for 95% of construction waste to go to landfill or be handled in a secondary materials market - as unrealistic. It is also harmful, given the inability of local waste sites like Powerday and Quattro to control pollution like dust and odours and worse, the regular dumping of waste material by rogue builders and smaller contractors that will often be part of developers' supply chains. The OPDC, developers and waste firms will have to be far more imaginative and commit money to addressing this challenge, along with the Environment Agency and local boroughs' environmental health departments. We cannot allow this AND successfully have thousands of new homes delivered here.
95	1798	Local Resident	Mark Walker		Environment and Utilities	EU4		I welcome Air Quality Policy EU4's recognition of serious air pollution OPDC area which is a continual and growing worry for local residents. I want an extra policy, EU4i), requiring that all major developments' planning permissions use low emission vehicles during construction.
95	1800	Local Resident	Mark Walker		Environment and Utilities	EU6		I think Policy EU6 encouraging higher recycling from new housing is weak and ineffective. Paragraph 6.87 only talks vaguely of "innovation in communal waste collection facilities" and "developers will need to provide residents with appropriate details on how to make best use of their waste collection and storage infrastructure" but local residents' lives are already blighted by inadequate waste collection and failure of landlords to invest in recycling measures - unless they are pressured to do so by local residents' groups like TITRA. I want Local Plan EU6 to put responsibility on developers to find smarter ways to manage domestic waste removal and new ideas for recycling and build these measures into planning approvals.
97	1829	Local Resident	Ralph Scully		Environment and Utilities	E6		We also note that the Local Plan fails to control waste plants in the area, including PowerDay, who received record-breaking fines recently.
97	1843	Local Resident	Ralph Scully		Environment and Utilities	EU1		Wells House Road has no accessible greenspace suitable for children. We ask you to consider the options that could be included within the development. These could be located at a) the greenspace promised to us by HS2 between Wells House Road and the HS2 OOC station; b) the small area of Wormwood Scrubs on the Old Oak Common Lane side to be cleaned up and made safe and suitable for children; c) the woodland to the South of Wells House Road/
100	1930	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Environment and utilities	EU6	P2	Our Forum approves in broad terms of Policy P2I supporting health and well-being by ensuring sensitive uses are "located away from pollution sources" and new development "mitigates the impacts of noise and air pollution generated by rail transport and the surrounding uses including Old Oak Sidings waste facility" but the association requests that this policy goes further, requiring wider sharing of waste processing across Park Royal and Old Oak's waste sites - alongside a much greater emphasis on local waste being managed 'at source' as the London Plan requires. The Powerday site at Old Oak Sidings has long struggled to comply with UK pollution legislation and we question the Plan's strong reliance on the Powerday site (also in Policy EU6).
100	1962	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Environment and utilities	EU6		Local residents strongly question the Plan's over-reliance on such sites with questionable records on waste processing and environmental legislation. Residents object to the Plan's longer-term aspiration that Powerday's site should be used as an energy-generation site in the future, especially given the far greater number of residential properties in Old Oak provided by that time. Our Forum wishes to see more waste disposed of at source, in line with 'circular economy' models as well as London Plan policies.
100	1978	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Environment and utilities	EU1		On Policy EU1 on Open Space we question whether EU1d) will prove effective, given the difficulties of ensuring that private open space intended for public access will retain such a status over time. While the planning system can impose conditions on new developments at the time of granting permission, it is much harder to ensure that these requirements are maintained over time.
100	1979	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Environment and utilities	EU3		On Policy EU3 on Water, we support the comments of RB Kensington and Chelsea on the problems of overloading of the Counters Creek sewer. RBKC notes that reference to the acute lack of capacity in the Counters Creek sewer has disappeared from the draft policy included for Regulation 18 Local Plan. Local residents have been very aware of the issues around in the years since instances of surface flooding in Kensington.
100	1980	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Environment and utilities	EU3		RBKC points out that the Integrated Water Management Strategy needs amending to make clear that the Counters Creek sewer is already in place. The project that Thames Water is currently developing is the Counters Creek Storm Relief Sewer so the reference should be corrected. This does not inspire confidence in the Strategy. As we understand, there is no guarantee as yet that the Storm Relief Sewer project will be confirmed within the TWA capital programme and fully implemented. This is one of many reasons why we consider the 24,000 new homes target to be inadequately evidenced and not justified.
100	1981	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Environment and utilities	EU4		On Policy EU4 on Air Quality, the supporting text recognises that the OPDC area experiences significant air pollution. This is a huge and growing concern for local residents as the links with health problems become ever more apparent. We suggest that an additional policy EU4i) is added, ensuring that planning permissions for major developments are conditioned to require the use of low pollution construction vehicles.
101	2019	Local Resident	Jason Salkely		Environment and Utilities	EU6		TITRA objects to Policy EU6 on waste which commits to complying with the West London Waste Plan and safeguarding the waste sites in the Channel Gate 'Place' and Powerday at Old Oak Siding. Residents have suffered for decades from dust, noise and particulate pollution from the Euroterminal's waste disposal and railway maintenance sites and want controls in line with environmental protection legislation. TITRA's residents wish to see far greater emphasis on waste disposed of at source by Park Royal and Old Oak's industrial sites, in accordance with the London Plan's policies. We believe strongly that industrial site owners should not be allowed to regard Old Oak's ring of waste sites as a catch-all for their failure to invest in 'circular economy' thinking and 'at source' disposal processes.
101	2020	Local Resident	Jason Salkely		Environment and Utilities	EU6	6.3	TITRA objects very strongly to Policy EU6 (6.3, p175) seeking to safeguard the Powerday site for meeting the area's waste needs under the London Plan. As TITRA residents are still continually troubled by odours/dust from Powerday (the company received a UK-record £1 million fine for non-compliance with environmental legislation in 2016), it's clear that the company is incapable of complying with environmental legislation so it can operate in this residential area. This fundamental mistake will be compounded as the plan's 25,000 homes are added: the OPDC risks having thousands of residents suffering health issues and pollution in the future, rather than the 'mere hundreds' troubled by them now.
103	2113	Local Resident	Dave Turner		Environment and Utilities	EU6	6.3	TITRA objects to Policy EU6 on waste which commits to complying with the West London Waste Plan and safeguarding the waste sites in the Channel Gate 'Place' and Powerday at Old Oak Siding. Residents have suffered for decades from dust, noise and particulate pollution from the Euroterminal's waste disposal and railway maintenance sites and want controls in line with environmental protection legislation.

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
								TITRA's residents wish to see far greater emphasis on waste disposed of at source by Park Royal and Old Oak's industrial sites, in accordance with the London Plan's policies. We believe strongly that industrial site owners should not be allowed to regard Old Oak's ring of waste sites as a catch-all for their failure to invest in 'circular economy' thinking and 'at source' disposal processes.
103	2114	Local Resident	Dave Turner		Environment and Utilities	EU6	6.3	TITRA objects very strongly to Policy EU6 (6.3, p175) seeking to safeguard the Powerday site for meeting the area's waste needs under the London Plan. As TITRA residents are still continually troubled by odours/dust from Powerday (the company received a UK-record £1 million fine for non-compliance with environmental legislation in 2016), it's clear that the company is incapable of complying with environmental legislation so it can operate in this residential area. This fundamental mistake will be compounded as the plan's 25,000 homes are added: the OPDC risks having thousands of residents suffering health issues and pollution in the future, rather than the 'mere hundreds' troubled by them now.
103	2115	Local Resident	Dave Turner		Environment and Utilities	EU6		TITRA objects very strongly to Policy EU6, envisaging Powerday becoming an energy/CHP site in future; this Local Plan should follow its own/the London Plan's logic and require industrial sites deal with their own output, site by site.
103	2116	Local Resident	Dave Turner		Environment and Utilities	EU6		TITRA regards Policy EU6, calling for 95% of construction waste to go to landfill or be handled in a secondary materials market involving developers, as unrealistic. It is also harmful, given the inability of local waste sites like Powerday and Quattro to control pollution like dust and odours and worse, the regular dumping of waste material by rogue builders and smaller contractors that will often be part of developers' supply chains. TITRA supports the aspiration but states that the OPDC, developers and waste firms will have to be far more imaginative in addressing this challenge and they along with the Environment Agency and local boroughs' Environmental health departments will have to commit resources to policing this activity in the future.
103	2117	Local Resident	Dave Turner		Environment and Utilities	EU4		TITRA welcomes Air Quality Policy EU4's recognition of serious air pollution OPDC area which is a continual and growing worry for local residents. TITRA requests an extra policy, EU4i), requiring that all major developments' planning permissions use low emission vehicles during construction.
103	2119	Local Resident	Dave Turner		Environment and Utilities	EU6		TITRA believes that Policy EU6 encouraging higher recycling from new housing is weak and ineffective. Paragraph 6.87 can talk vaguely of "innovation in communal waste collection facilities" and "developers will need to provide residents with appropriate details on how to make best use of their waste collection and storage infrastructure". TITRA residents' lives are already blighted by inadequate waste collection and failure of landlords to invest in recycling measures unless pressured to do so by local residents. We think the Local Plan needs to place full responsibility on developers to find smarter ways to manage domestic waste removal and new ideas for recycling and build these measures into planning approvals.
104	2146	Community Group	Del Brenner	Regents Network	Environment and Utilities	EU3		The opportunity is there to bring these two lost rivers to the surface in the OPDC area, and Stamford Brook would be a great feature around Hythe Road and then through the west end of Wormwood Scrubs. The continuation of the rivers down to the Thames cannot resurface as they flow in culverts under the streets and houses, and are unfortunately connected to the sewers, but as they discharge into the Thames, then any sewerage or contamination has to be separated.
106	2203	Local Resident	Catherine Sookha		Environment and Utilities	E6		We also note that the Local Plan fails to control waste plants in the area, including PowerDay, who received record-breaking fines recently.
106	2217	Local Resident	Catherine Sookha		Environment and Utilities	EU1		Wells House Road has no accessible greenspace suitable for children. We ask you to consider the options that could be included within the development. These could be located at a) the greenspace promised to us by HS2 between Wells House Road and the HS2 OOC station; b) the small area of Wormwood Scrubs on the Old Oak Common Lane side to be cleaned up and made safe and suitable for children; c) the woodland to the South of Wells House Road/
106	2223	Local Resident	Catherine Sookha		Environment and Utilities	EU4		Currently the language in the policy indicates that developments should not increase noise pollution or diminish air quality, and this has been to some extent upheld in planning applications. However, the other aspect of this is that developments should not place people in areas which will damage their health through pollution, and this has not been given weight in planning determinations (notably Mitre Yard). In addition, throughout the policies, green infrastructure is seen as important in diminishing air pollution, but very little has been provided in planning applications approved to date. Policy wording could expect that no new developments take place in areas of exceedance of acceptable EU standards of maximum air and noise pollution. Stringent monitoring of each development should ensure enforcement of planning conditions (as for example conditions in 12.24 and 12.25 of Planning Officer's report on Mitre Yard – see below.
106	2224	Local Resident	Catherine Sookha		Environment and Utilities	EU4		So, for example, Policy D5 Tall Buildings, requires that they: e) do not adversely impact the amenity of their surroundings in terms of: i) microclimate; ii) overshadowing and daylight and sunlight; iii) wind turbulence; iv) air quality; v) noise; vi) lighting; vii) reflected glare; And EU 4 6.52. High density development can have a significant impact on air flow and areas of pollution accumulation.! The Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) have produced guidance on managing air quality in cities that states that "wherever possible, new developments should not create a new "street canyon" or a building configuration that inhibits effective pollution dispersion". But more is required to ensure that people are not exposed to health risks through location of tall buildings in high pollution locations Air Quality Study (Supporting Document 4) presents the following relevant policy trail: National Guidance suggests the Local Plan should consider: new developments which "Expose people to existing sources of air pollutants. This could be by building new homes, workplaces or other development in places with poor air quality." (p. 15) And the Mayor's London Plan Policy 7.14 requires development to: "minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMA) and where development is likely to be used by large numbers of those particularly vulnerable to poor

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								air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans (see Policy 6.3). (p. 17) Recommendation (p. 72) and the Mayor's priorities suggest that: "Developments should be designed to minimise and mitigate against increased exposure to poor air quality;" (p. 19). The relevant policy phrasing is present. A relevant form of words could be introduced to Places policies, especially where noise and air pollution levels are high, or tall buildings proposed. The following is recommended to be inserted for each local Place in the policy box: EU4 Table 6.1 AQS recommendations: Proposals should not increase the area of exceedance of EU established health-based standards and objectives for NO2 and PM10. Where new developments are introduced into an area where the standards and objectives are exceeded, developments should be designed to minimise and mitigate against increased exposure to poor air quality. In this regard, the following text is too cavalier and could be reworded: e.g. "Developments should not be encouraged in areas of pollution exceedance". Some objective limits should be determined.
106	2225	Local Resident	Catherine Sookha		Environment and Utilities	EU4		There is support for this in existing Local Plans, cited in the Air Quality Study: LBHF Borough Policy considers air quality and new developments: Requiring all major developments to provide an air quality assessment that considers the potential impacts of pollution from the development on the site and on neighbouring areas and also considers the potential for exposure to pollution levels above the Government's air quality objective concentration targets; Requiring mitigation measures to be implemented to reduce emissions, particularly of nitrogen oxides and small particles, where assessments show that developments could cause a significant worsening of local air quality or contribute to the exceedances of the Government's air quality objectives; and Requiring mitigation measures that reduce exposure to acceptable levels where developments are proposed that could result in the occupants being particularly affected by poor air quality. (p. 32) Also, the LBHF aims to: The council will have reduced road traffic generated in the borough and will wherever possible have reduced the impact of other road traffic on the local environment, particularly in terms of noise and air quality impacts. Where the council does not control the roads, for example the busy A4 and A40, the council will have worked with its partners, particularly Transport for London to achieve these aims; (p., 32) For reference the HS2 code of practice is on p. 34 of the Air Quality Study.
106	2226	Local Resident	Catherine Sookha		Environment and Utilities	EU4		Other helpful forms of words are already in the text: D6 Amenity iii) are located away from and/or designed to mitigate air, light and noise polluting activities where possible. 5.49: "To support their usage, where possible, they should be positioned away from, or designed to mitigate, sources of noise and poor air quality that would make them unpleasant to use." This is reinforced in Policy EU4 Air Quality "f) designing and positioning buildings, civic and open spaces to minimise exposure to elevated levels of pollution by avoiding creating street canyons, or building configurations that inhibit effective pollution dispersion."
106	2228	Local Resident	Catherine Sookha		Environment and Utilities	EU4		The Mitre Yard development is located at proposed new pollution monitoring zone at a place of high exceedances in NOx and also particulate matter is expected to be very high with waste functions. The Planning statement did not consider the air quality of the location of the development. The Air Quality Statement indicated very high pollution levels. Planning Officers' report on this case noted Air quality predictions at different Heights within the Development 1.59 The Air Quality Assessment presents data for the locations within the Development that are likely to be exposed to the worst-case air quality conditions i.e. the lowest floor levels of the Development that would be the nearest to road traffic and the highest residential levels of the Development closest to heating plant emissions. Tables B9 to B13 present predicted concentrations at various heights, representative of sensitive receptors (refer to Table 3 of the Air Quality Assessment) at different floor levels. Ground floor and roof = play spaces, public spaces, park... "The roof terraces, rear garden and balconies will be affected by road traffic and rail traffic noise and will exceed the desirable noise levels set out in BS8233:2014. However, BS8233 states that, in high noise areas, such as city centres or urban areas adjoining the strategic transport network, a compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be met might be warranted." (OPDC Planning Committee 120717, p. 69, 7.193) IN relation to air quality: "7.2.9 In terms of air quality for future residents whilst air quality standards along Scrubs lane are currently in breach of existing targets the assessment argues that future improvements to the emissions of vehicles will improve air quality standards to an acceptable level by the time the development is ready for occupation. However, LBHF EH officers have raised concerns that this might not be the case in practice and therefore mechanical ventilation may be required as part of the development in order to ensure that appropriate air quality is provided for future residents. It is recommended that this matter is resolved through the imposition of a condition on any permission requiring the submission, approval and implementation of a ventilation strategy prior to commencement of the development." P. 73, 7.219
106	2229	Local Resident	Catherine Sookha		Environment and Utilities	EU4		The subsequent conditions are set requiring (1) Abatement technologies for boilers as condition (12.24) – for apartments or outside space? (2) NOx emissions standards and air pollution mitigation – in the Planning Committee discussion this seemed to refer purely to air conditioning. 12.25 PRE-COMMENCEMENT – Air Quality (Low Emissions Strategy)

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
								Prior to the commencement of the development a Low Emission Strategy shall be submitted to and approved in writing by the local planning authority. The Low Emission Strategy must address the results of the Air Quality Assessment and detail the remedial action and mitigation measures that will be implemented to protect residential receptors (e.g. abatement technology for energy plant, design solutions). This Strategy must make a commitment to implement the mitigation measures (including NOx emissions standards for the chosen energy plant) that are required to reduce the exposure of on-site and off-site local receptors to poor air quality and to help mitigate the development's air pollution impacts, in particular the emissions of NOx and particulates from on-site and off-site transport and energy generation sources. Evidence must also be submitted to and approved in writing by the local planning authority to show that the CHP and boiler units installed will comply with the relevant emissions standards in the Mayor's SPG 'Sustainable Design and Construction' (2014). Reason: To ensure the development contributes to improvements in air quality in accordance with London Plan (2016) policy 7.14 'Improving Air Quality', LBHF Regulation 18 Local Plan (2015) policy CC9 'Air Quality' and OPDC Regulation 19 Local Plan (2017) policy EU4 'Air Quality'. The pollution consequences of increased "tunneling" of tall buildings on either side of the road were not considered. Strengthening the requirement to meet acceptable air quality standards could set some expectations for (a) absolute maxima for children's play spaces and outdoor amenity spaces and (b) rigorous monitoring and (c) overall reduction of noise and air pollution to expected maxima prior to developments being inhabited
107	2248	Residents Association	Mark Walker	TITRA	Environment and Utilities	EU6		This Plan's Policy SP5 protects Park Royal's industrial base – therefore that sector must start contributing more effectively waste management processes managed away from existing and new residential areas; Policies EU6 and P2 place too much reliance on an over-sized waste site that is not fit for purpose.
107	2258	Residents Association	Mark Walker	TITRA	Environment and Utilities	EU6	6.3	TITRA objects to Policy EU6 on waste which commits to complying with the West London Waste Plan and safeguarding the waste sites in the Channel Gate 'Place'. Residents have suffered for decades from dust, noise and particulate pollution from the Euroterminal/Channel Gate Yard waste disposal and railway maintenance sites, which have not been regulated (since Network Rail is deemed to be private landowner and its outsourced management company continues to grant short-term leases to 'dirty' sites). Polluting activities are still not controlled in accordance with relevant UK environmental protection legislation. TITRA's residents wish to see far greater emphasis on waste disposed of at source by Park Royal and Old Oak's industrial sites, in accordance with the London Plan's policies. We believe strongly that industrial site owners should not be allowed to regard Old Oak's ring of waste sites – most glaringly the Powerday site - as a "safety net" that excuses them from having to invest in 'circular economy' thinking and 'at source' disposal processes now and in the future.
107	2259	Residents Association	Mark Walker	TITRA	Environment and Utilities	EU6	6.3	TITRA objects very strongly to Policy EU6 (6.3, p175) seeking to safeguard the Powerday site for meeting the area's waste needs under the London Plan. As TITRA residents are still continually troubled by odours/dust from Powerday (the company received a UK-record £1 million fine for non-compliance with environmental legislation in 2016), it's clear that the company is unsuited to operate in a residential area. This fundamental mistake will be magnified as the Local plan's 25,000 homes are added: the OPDC risks having thousands of residents suffering health issues and pollution in the future, rather than the hundreds that are troubled by them now.
107	2260	Residents Association	Mark Walker	TITRA	Environment and Utilities	EU6		TITRA objects very strongly to Policy EU6 envisaging Powerday becoming an energy/CHP site in future; this Local Plan should follow its own/the London Plan's logic and require industrial sites deal with their own output, site by site.
107	2261	Residents Association	Mark Walker	TITRA	Environment and Utilities	EU6		TITRA regards Policy EU6, calling for 95% of construction waste to go to landfill/be handled in a secondary materials market involving developers, as unrealistic and weak. It is also harmful, given the inability of local waste sites like Powerday and Quattro to control pollution like dust and odours as well as the regular dumping of waste material by rogue builders and smaller contractors that is frequently part of developers' extended supply chains. TITRA supports the policy's general aspiration but states that the OPDC, developers and waste firms will have to be far more imaginative in addressing this challenge. As a result, TITRA calls for additional policies within EU6 that requires investment and resources by these stakeholders, also including the Environment Agency and local boroughs' Environmental health departments on policing this activity. Residential areas will be ruined if this fly-tipping is ignored and this policy is not developed.
107	2262	Residents Association	Mark Walker	TITRA	Environment and Utilities	EU4		TITRA welcomes Air Quality Policy EU4's recognition of serious air pollution OPDC area which is a continual and growing worry for local residents. We welcome Old Oak Lane becoming an air quality focus area and its proposed air quality monitoring point at the junction of Old Oak Lane and Channel Gate Road (as in EU4, Figure 6.7).
107	2263	Residents Association	Mark Walker	TITRA	Environment and Utilities	EU4		TITRA requests an extra policy, EU4i), requiring that all major developments' planning permissions use low emission vehicles during construction
107	2267	Residents Association	Mark Walker	TITRA	Environment and Utilities	EU6		TITRA believes that Policy EU6 encouraging higher recycling from new housing is weak and ineffective. Paragraph 6.87 can talk vaguely of "innovation in communal waste collection facilities" and "developers will need to provide residents with appropriate details on how to make best use of their waste collection and storage infrastructure". TITRA residents' lives are already blighted by inadequate waste collection and failure of landlords to invest in recycling measures unless pressured to do so by local residents. We think the Local Plan needs to place full responsibility on developers to find smarter ways to manage domestic waste removal and new ideas for recycling and build these measures into planning approvals. Unless the corporation does design such policies into its Local Plan, problems of street litter, domestic waste dumping and fly-tipping associated with over-development and unregulated/regulated rented properties and high-rise property, will become worse for everyone.
109	2292	Local Resident	Lynette Hollender		Environment and Utilities	E6		We also note that the Local Plan fails to control waste plants in the area, including PowerDay, who received record-breaking fines recently.
109	2306	Local Resident	Lynette Hollender		Environment and Utilities	EU1		Wells House Road has no accessible greenspace suitable for children. We ask you to consider the options that could be included within the development. These could be located at a) the greenspace promised to us by HS2 between Wells House Road and the HS2 OOC station; b)

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								the small area of Wormwood Scrubs on the Old Oak Common Lane side to be cleaned up and made safe and suitable for children; c) the woodland to the South of Wells House Road/
110	2393	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU1		The policy is not effective. The expression of commitment to securing the delivery of a high-quality network of green infrastructure and open spaces is welcomed. There is a need to recognise the wide range and variety of such spaces in quality, types (both function and character) and contributions they can make to the human and natural environments and, therefore, policy and programmes need to reflect this in delivery.
110	2394	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU1		Each site should contribute 'greenness' –if only green walls or 'potted plants', but overall, area wide of at least 30% open space outside of SIL is an admirable target. However, care has to be exercised with respect to adjoining built development to minimise overshadowing from high rise or blocky buildings.
110	2395	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU1		Whereas the NPPF paras 76-78 enables local communities, through the plan-making process, to identify special protection green areas of particular importance to them to be designated as Local Green Spaces, the OPDC has not notified or afforded communities of this possibility.
110	2396	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU1		Policy confusingly uses both terms public open space and publicly accessible open space. Doubt resides among community members as to the permanence of access to these open spaces given that they are to be privately provided and seemingly not adopted as public parks. Guaranteeing access should be part of the long-term management and maintenance arrangements. The OPDC could facilitate the creation of resourced Parks Trusts along the lines of that in Milton Keynes. On 'publicly accessible spaces' see Guardian article "Revealed: the insidious creep of pseudo-public space in London": https://www.theguardian.com/cities/2017/jul/24/revealed-pseudo-public-space-pops-london-investigation-map .
110	2397	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU1		A particular request has been made for lunchtime spaces in Park Royal for its 30,000 or more workers.
110	2398	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU2		The policy is not effective. Railway lines function as nature's corridors and together with the canal and open and green spaces have established a green grid type network across the OPDC area. This also serves for visual variety and relief from built up development. However, the Old Oak development and elsewhere, as at North Acton, will disrupt and interrupt this.
110	2399	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU2		Existing areas of biodiversity will be placed under threat from loss or displacement and additional provision is necessary to ensure proper and reasonable access to nature by new development. The OPDC's own Biodiversity Action Plan, as promised in the SINCs Study, should be produced as soon as possible to support this Policy.
110	2400	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU2		Whilst it is recognised that Policy SP8 Green Infrastructure and Open Space requires major developments to produce a wide ranging Green Infrastructure and Open Space Strategy and Management Plan (GIOSSMP), a component of this – the Green Space Factor and Green Points System score - has not yet been elaborated. Text para 6.31 does not add much information.
110	2401	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU2		Within natural areas, it is important to consider the variability (to promote variety and biodiversity) as well as the amount/scale (to promote biomass). Consequently, it is uncertain how and to what extent 'optimised urban greening' will be achieved.
110	2402	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU2		Other comments include a request to deliberately avoid high maintenance planting etc.
110	2403	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU2		retain/include semi-wild areas
110	2404	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU2		a local tree nursery/environmental education resource centre (c.f. Welsh Harp) at Wormwood Scrubs (if Trustees/Friends welcome) or elsewhere as appropriate
110	2405	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU2		Trees are important contributors to attractive place-making and environmental mitigation and are best sourced locally having adapted to the local growing conditions.
110	2406	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU2		Still relevant from Regulation 18 response: The Policy lacks necessary strategy, analysis and proposals. It lacks a strategic approach and is not planning positively for it is not supported by up to date information, assessments and proposals about the natural environment/ecological networks that national and regional policy require and guidance advise (NPPF114, 165 & PPG8-04).
110	2407	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU2		Still relevant from Regulation 18 response: The canal warrants particular biodiversity policy focus. Locally appropriate guidance should be developed to address the following: The provision of green roofs, 'living walls' and spaces that will absorb water, rather than using concrete / hard surface materials and will reduce air pollutant concentrations. The greening of areas unlikely to be redeveloped in the near future, particularly Park Royal. Cross borough cooperation to mitigate impact of development and provide additional green corridors and spaces and biodiversity provision at the edges of the OPDC area; facilitate connectivity of networks and access for users of green infrastructure across MDC boundary.
110	2408	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU3		The policy is not effective. Uncertain if (new) local parks and Wormwood Scrubs will be given over to swales. If a strategic approach to SuDs and to the use of the canal is not achieved then developments depending on individual SuDs will have higher infrastructure and amenity costs.
110	2409	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU3		Flooding is not tackled strategically, but on ad hoc development-led basis which is likely to leave parts of Park Royal vulnerable to storm surface water flooding. Generally, utility infrastructure, with sewers maxed out, is inadequate to meet present demands let alone with the additional burdens of the planned amount of development.
110	2410	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU3		Still relevant from Regulation 18 response: "London faces a drinking water shortfall, but at the same time problems of excess water: sewer overflows and flood risk in the event of excess rainfall" (London Assembly Environment Committee Growing, Growing, Gone Report, March 2016)
110	2411	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU3		Still relevant from Regulation 18 response: Policy is uncertain in terms of land take, visual impact, neighbourliness, displacement etc. being unstated. This is a policy lacking clarity, coupled with uncertain delivery. The concern is there will be an expectation that open spaces,

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								including Wormwood Scrubs, would need to have swales. Whilst facilities have been integrated into Olympic Park, these are relatively small scale compared with strategic facilities needed for the quanta of development at Old Oak etc.
110	2412	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU3		Still relevant from Regulation 18 response: Counters Creek sewer catchment has acute capacity issues and is at risk (RTPI London Seminar 23 September 2015). It is unlikely to have capacity even for black water making the development proposal of Old Oak largely undeliverable given the multiple increases in demand. "Local Plan needs to grapple with" this (PPG34-002).
110	2413	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU4		The policy is not effective. It is weak in remedying excess (exceedance) of air pollution as soon as possible as required by Supreme Court. It depends on ad hoc developments to help reduce air pollution. It is imperative to secure ultra-low vehicles and construction machinery and non-polluting transport.
110	2415	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU4		Low Emissions Neighbourhood (LEN) as a Policy Proposal: The Air Quality Study recommends the adoption of a Local Emissions Neighbourhood Policy (p. 67). Whilst the LEN is discussed in the supporting text to Policy EU4, relevant wording needs to be strengthened and brought explicitly into the policy box. Such as: 'The OPDC will work with TfL to implement a LEN across the whole of the OPDC and neighbouring areas'. Otherwise new developments simply bring large numbers of people into the most polluted areas.
110	2416	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU4		Developments that provide for sensitive receptors should not take place in areas of exceedance for air pollution. Currently the language in the policy indicates that developments should not diminish air quality, and this has been to some extent upheld in planning applications. However, the other aspect of this is that developments should not place people in areas which will damage their health through pollution, but this has not been given weight in OPDC planning determinations (notably Mitre Yard, Scrubs Lane). In addition, green infrastructure is seen as important in diminishing air pollution, but very little has been provided in planning applications approved to date. Strengthening the requirement to meet acceptable air quality standards could set some expectations for (a) absolute maxima for children's play spaces and outdoor amenity spaces, (b) rigorous monitoring and (c) achieving overall reduction of air pollution prior to developments being inhabited.
110	2417	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU4		Still relevant from Regulation 18 response: The policy insufficiently strategic and emphatic, lacking certainty in remedying poor air quality. It lacks a more strategic area wide approach to securing reductions in the levels of air pollutants by relying on site by site development proposals through individual air quality assessments. The planned transformation in the quanta, extent and nature of development will inevitably significantly change air quality. National policy context requires taking into account AQMAs and cumulative impacts from individual sites. There is now a need to expedite compliance with EU limit values and national objectives. Air quality neutral – a London Plan policy requirement and not simply an Air Quality Study recommendation - may not now be of sufficient rigour to remedy poor air quality. Its implementation through the SPG with its very technical computations is virtually a 'black box' operation lacking accessibility and the certainty that it actually delivering the policy requirement.
110	2418	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU4		Still relevant from Regulation 18 response: Promote and proactively use interventions including 'filter stations', the planting of trees, shrubs etc., 'living walls' that effectively absorb pollutants.
110	2419	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU5		The policy is not effective. Welcome the addition of 'vibration', 'agent of change' and more on assessments, but there needs to be a more strategic and joined up approach (OPDC with TfL & HS2) to protect existing and new property, mitigating and monitoring. The policy should be broadened to include dust, odour and risk of subsidence and tightened up to specify performance standards. Periodic auditing of the area would usefully provide a monitoring benchmark and reveal changes that may require additional attention (mitigation or cessation).
110	2420	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU5		Still relevant from Regulation 18 response: Policy wording omits improving the acoustic environment and protecting (relative) tranquillity areas. This is particularly important during the construction phases when noise and vibration are of a distinct and different nature. The build out periods are anticipated to be protracted and, consequently, should be addressed by a specific part of the Policy.
110	2421	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU6		The policy is not effective and justified. It places reliance on out of date West London Waste plan, out of step with down-sized targets for waste in the current London Plan, with an unnecessary site allocation protection for Quattro facility.
110	2422	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU6		It should proactively plan for relocation of waste facilities, including the Old Oak Sidings site (Powerday), and the inclusion of 'compensatory site provision' within policy may assist with this, subject to careful consideration of impacts, particularly on residential amenity.
110	2423	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU6		Energy from waste using incineration is a fundamental misunderstanding of circular economy principles.
110	2424	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU6		Still relevant from Regulation 18 response: Policy (a) is out of date and is not justified. The OPDC has adopted the West London Waste Plan, an already out of date plan, which safeguards an overprovision of opportunities to meet identified needs. (See further response to OPDC Waste Strategy evidence paper). However, national guidance only seeks sufficient (PPG28-011) - presumably for the efficient use of scarce land and the proper planning of an area. There is no substantial justification for safeguarding Quattro as a waste site. Local residents have objected and its relocation locally would be problematical. Policy has failed to respond to current higher level policy and guidance.
110	2425	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU6		Still relevant from Regulation 18 response: The safeguarding of existing Old Oak Sidings waste management site (Powerday) with a proposed tripling of the current level of throughput and for it to become Old Oak's construction material reprocessing centre and to meet LB H & F's apportionment targets. The site at one-third throughput is already the object of complaints from local residents, a population which is to be substantially added to through the Old Oak development.
110	2426	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU6		Still relevant from Regulation 18 response: Fully integrate environmental infrastructure (including facilities for minimisation of waste and the maximisation of recycling) within housing developments. Encourage standardisation and co-ordination of procedures around waste and recycling to prevent confusion and duplication especially where developments cross borough boundaries.
110	2427	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU6		Still relevant from Regulation 18 response: Energy from waste using incineration is a fundamental misunderstanding of the Circular Economy concept and would be contrary for an exemplar to secure sustainable environmental standards. There are alternatives, much more environmentally friendly ways and technologies, to achieving local energy production/distribution and dealing with waste

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110	2428	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU7		The policy is not effective. Welcome that the Policy has been broadened and that expectations or opportunities are usefully expressed in text para 6.90. But Policy is still reliant on major developments bringing forward a shared and circular economy for which the supporting study has a range of possibilities rather than an implementation strategy/programme. In this sense the Policy is aspirational only. Comments at the West London Business Group meeting on the Circular Economy were interesting with people feeling that the concept was an excellent idea, but lacking in specific examples around how this might be applied.
110	2429	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU7		Still relevant from Regulation 18 response: The policy misapplies concept to support energy from waste if incineration is proposed. Circular Economy not only facilitates more sustainable ways of managing waste and improves resource efficiency, but also provides for more environmental and business resilience, together with offering job and business opportunities (London Assembly Environment Committee Growing, Growing, Gone Report, March 2016). This LA report gives a more accurate explanation of Circular Economy which does not substantiate energy from waste using incineration. This comment also applies to EU6 waste Management policy.
110	2430	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU8		The policy is not effective. The contribution to resource efficiency is welcomed, but the Policy does not extend the factoring in of embedded carbon beyond materials. A wider application of embodied carbon should be sought ensure a resource efficient development over its life time. Still relevant from Regulation 18 response: The policy should have greater referencing to 'embodied carbon', with a target with the aim of increasing efficiency in, minimising resource use and to assist in meeting London Plan targets. Embodied carbon does not yet appear in the London Plan, but there is an imperative to go beyond current policy concepts and targets in order to deliver exemplary development. Given the time lines of the Local Plan, the MDC and development build out, it is appropriate to think, for example, beyond zero carbon buildings and plan for buildings that are carbon sinks. (At time of writing) Note that six local authorities including Brighton and Hove require embodied carbon estimates. Requirements for embodied carbon assessments in both the Netherlands and Germany are soon to be introduced in other countries. Embodied carbon is likely to be an indicator in EU harmonised sustainability assessment framework and the Embodied Carbon Taskforce has been lobbying for the inclusion of embodied carbon abatement as an Allowable Solution. 2 diagrams from Regulation 18 response not copied here
110	2431	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU9		Policy EU9 Minimising Carbon Emissions and Overheating: The policy is not effective. Policy is welcomed because the Plan now says more on meeting carbon reduction targets and climate change. But it is underachieving and so will not align with Mayor's Zero Carbon London by 2050 aspiration.
110	2432	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU9		Need to move to BREEAM 'outstanding'. It is essential to prevent buildings overheating and the unaffordability of higher heating/cooling costs when occupied compared with the costs theoretically predicted at design stage. This is so important for preventing issues around fuel poverty and sustainability.
110	2433	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU9		The requirement for post-construction audits is welcomed and this should include energy performance. Bath University carried out a study (reported in the Times*) that highlighted where utility bills had doubled (despite the energy savings experts and their modelling) and that any modelling had to be tested when flats were finished and occupied. This then relates to *"Utility bills double because of 'useless' energy-saving experts" by Ben Webster, Environment Editor, The Times, dated 04/05/2017
110	2434	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU10		The policy is not effective. Ambitions will not be fulfilled: energy supply to area is/will be problematical especially with HS2 demands; and aspirations for renewables, local generation and storage systems insufficient.
110	2435	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU10		Energy centres for each development and imported energy will be accepted (Consultant reported to the OPDC Board 11thMay 2017). This also has amenity implications given the uncertainty around Energy Centres, their size, distribution are potential levels of nuisance and disturbance unknown.
110	2436	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU10		There is concern over the viability of a decentralised energy network unless a critical mass of users and a range of different users are linked in in order to achieve scale, economy and balance demand and production. There are the cost and lock-in implications to the consumer of a single commercial provider. An alternative could be a networked (street) block by block approach, as in Denmark, so that if there is a supply outage or the costs become unaffordable, they can share energy.
110	2437	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU10		This policy should recognise that distribution systems for cooling may be as equally important as light/heat/hot water and will be increasingly important when the current occasional heatwave will be the norm in future.
110	2438	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU10		Energy from waste using incineration would be detrimental to the area.
110	2439	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU11		The policy is not effective. It is reliant on ad hoc developments and, therefore, lacks comprehensive strategy to upgrade broadband to existing deficient areas, particularly in Park Royal to support existing and new businesses.
110	2440	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU12		The policy is not effective. If extraction is contemplated and realistic then safeguards should be tighter.
110	2441	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU12		Still relevant from Regulation 18 response: The policy fails to safeguard rail and canal facilities. Safeguarding existing, planned and potential rail heads, rail links in minerals policies is sought by NPPF 143. To these should be added the canal as sustainable transport.
110	2442	Community Group	Sharon Hayward	Grand Union Alliance	Environment and Utilities	EU13		The policy is not effective. We welcome the inclusion of protective requirements and the land contamination assessment procedure with the table and sequence of stages or steps, together with monitoring and evaluation, plus on-site treatment, recycling and reuse. But there is still the need for a strategic approach to remedying the long history of contaminating activities with independent verification, rather than the proposed development-led

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								site by site basis and self-certification. As recent events concerning fire safety, self-certification is problematical. Still relevant from Regulation 18 response: Such is the long and often unrecorded history of extensive contaminating activities – for example, 1865 OS map shows a Naphtha Works by the canal/Old Oak Common Lane – that the Precautionary Principle should be incorporated in policy and text. OPDC should take a more strategic approach to dealing with potential contamination (PPG 33-005). It is not sufficient to tackle this issue by responding to development proposals on a site by site basis as set out in this Policy. Development proposals should be assessed not only on conditions on that site, but also on surrounding sites, given the protracted build out periods envisaged – for example, Old Oak to 2037 and beyond. Sensitive receptors exist and will continue to exist or will be created through development in the vicinity of contaminated land. Introduce Governance to ensure proper Implementation of Policy. Verification (Stage 6) and on-going Monitoring (Stage 7) are crucial parts of decontamination, but the knowledge and expertise primarily resides outside of the OPDC, particularly with the boroughs. It is essential that the relationships between the OPDC, the boroughs and EA are formalised in order that duties, responsibilities and resources are clearly allocated to achieve greater certainty that remediation will be secured and policy satisfactorily implemented. Such governance can be seen as contributing to the clarity on the approach to remediation advised by PPG (33-005).
111	2668	Local Resident	Jeremy Aspinall		Environment and Utilities	E6		We also note that the Local Plan fails to control waste plants in the area, including PowerDay, who received record-breaking fines recently.
111	2682	Local Resident	Jeremy Aspinall		Environment and Utilities	EU1		Wells House Road has no accessible greenspace suitable for children. We ask you to consider the options that could be included within the development. These could be located at a) the greenspace promised to us by HS2 between Wells House Road and the HS2 OOC station; b) the small area of Wormwood Scrubs on the Old Oak Common Lane side to be cleaned up and made safe and suitable for children; c) the woodland to the South of Wells House Road/
113	2698	Local Resident	Thomas Dyton		Environment and Utilities	E6		We also note that the Local Plan fails to control waste plants in the area, including PowerDay, who received record-breaking fines recently.
113	2712	Local Resident	Thomas Dyton		Environment and Utilities	EU1		Wells House Road has no accessible greenspace suitable for children. We ask you to consider the options that could be included within the development. These could be located at a) the greenspace promised to us by HS2 between Wells House Road and the HS2 OOC station; b) the small area of Wormwood Scrubs on the Old Oak Common Lane side to be cleaned up and made safe and suitable for children; c) the woodland to the South of Wells House Road/
113	2718	Local Resident	Thomas Dyton		Environment and Utilities	EU4		Currently the language in the policy indicates that developments should not increase noise pollution or diminish air quality, and this has been to some extent upheld in planning applications. However, the other aspect of this is that developments should not place people in areas which will damage their health through pollution, and this has not been given weight in planning determinations (notably Mitre Yard). In addition, throughout the policies, green infrastructure is seen as important in diminishing air pollution, but very little has been provided in planning applications approved to date. Policy wording could expect that no new developments take place in areas of exceedance of acceptable EU standards of maximum air and noise pollution. Stringent monitoring of each development should ensure enforcement of planning conditions (as for example conditions in 12.24 and 12.25 of Planning Officer's report on Mitre Yard – see below.
113	2719	Local Resident	Thomas Dyton		Environment and Utilities	EU4		So, for example, Policy D5 Tall Buildings, requires that they: e) do not adversely impact the amenity of their surroundings in terms of: i) microclimate; ii) overshadowing and daylight and sunlight; iii) wind turbulence; iv) air quality; v) noise; vi) lighting; vii) reflected glare; And EU 4 6.52. High density development can have a significant impact on air flow and areas of pollution accumulation.! The Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) have produced guidance on managing air quality in cities that states that “wherever possible, new developments should not create a new “street canyon” or a building configuration that inhibits effective pollution dispersion”. But more is required to ensure that people are not exposed to health risks through location of tall buildings in high pollution locations Air Quality Study (Supporting Document 4) presents the following relevant policy trail: National Guidance suggests the Local Plan should consider: new developments which “Expose people to existing sources of air pollutants. This could be by building new homes, workplaces or other development in places with poor air quality.” (p. 15) And the Mayor's London Plan Policy 7.14 requires development to: “minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMA) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans (see Policy 6.3). (p. 17) Recommendation (p. 72) and the Mayor's priorities suggest that: “Developments should be designed to minimise and mitigate against increased exposure to poor air quality,” (p. 19). The relevant policy phrasing is present. A relevant form of words could be introduced to Places policies, especially where noise and air pollution levels are high, or tall buildings proposed. The following is recommended to be inserted for each local Place in the policy box: EU4 Table 6.1 AQS recommendations: Proposals should not increase the area of exceedance of EU established health-based standards and objectives for NO2 and PM10. Where new developments are introduced into an area where the standards and objectives are exceeded, developments should be designed to minimise and mitigate against increased exposure to poor air quality. In this regard, the following text is too cavalier and could be reworded: e.g. “Developments should not be encouraged in areas of pollution exceedance”. Some objective limits should be determined.

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113	2720	Local Resident	Thomas Dyton		Environment and Utilities	EU4		There is support for this in existing Local Plans, cited in the Air Quality Study: LBHF Borough Policy considers air quality and new developments: Requiring all major developments to provide an air quality assessment that considers the potential impacts of pollution from the development on the site and on neighbouring areas and also considers the potential for exposure to pollution levels above the Government's air quality objective concentration targets; Requiring mitigation measures to be implemented to reduce emissions, particularly of nitrogen oxides and small particles, where assessments show that developments could cause a significant worsening of local air quality or contribute to the exceedances of the Government's air quality objectives; and Requiring mitigation measures that reduce exposure to acceptable levels where developments are proposed that could result in the occupants being particularly affected by poor air quality. (p. 32) Also, the LBHF aims to: The council will have reduced road traffic generated in the borough and will wherever possible have reduced the impact of other road traffic on the local environment, particularly in terms of noise and air quality impacts. Where the council does not control the roads, for example the busy A4 and A40, the council will have worked with its partners, particularly Transport for London to achieve these aims; (p. 32) For reference the HS2 code of practice is on p. 34 of the Air Quality Study.
113	2721	Local Resident	Thomas Dyton		Environment and Utilities	EU4		Other helpful forms of words are already in the text: D6 Amenity iii) are located away from and/or designed to mitigate air, light and noise polluting activities where possible. 5.49: "To support their usage, where possible, they should be positioned away from, or designed to mitigate, sources of noise and poor air quality that would make them unpleasant to use." This is reinforced in Policy EU4 Air Quality "f) designing and positioning buildings, civic and open spaces to minimise exposure to elevated levels of pollution by avoiding creating street canyons, or building configurations that inhibit effective pollution dispersion."
113	2723	Local Resident	Thomas Dyton		Environment and Utilities	EU4		The Mitre Yard development is located at proposed new pollution monitoring zone at a place of high exceedances in NOx and also particulate matter is expected to be very high with waste functions. The Planning statement did not consider the air quality of the location of the development. The Air Quality Statement indicated very high pollution levels. Planning Officers' report on this case noted Air quality predictions at different Heights within the Development 1.59 The Air Quality Assessment presents data for the locations within the Development that are likely to be exposed to the worst-case air quality conditions i.e. the lowest floor levels of the Development that would be the nearest to road traffic and the highest residential levels of the Development closest to heating plant emissions. Tables B9 to B13 present predicted concentrations at various heights, representative of sensitive receptors (refer to Table 3 of the Air Quality Assessment) at different floor levels. Ground floor and roof = play spaces, public spaces, park... "The roof terraces, rear garden and balconies will be affected by road traffic and rail traffic noise and will exceed the desirable noise levels set out in BS8233:2014. However, BS8233 states that, in high noise areas, such as city centres or urban areas adjoining the strategic transport network, a compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be met might be warranted." (OPDC Planning Committee 120717, p. 69, 7.193) IN relation to air quality: "7.2.9 In terms of air quality for future residents whilst air quality standards along Scrubs lane are currently in breach of existing targets the assessment argues that future improvements to the emissions of vehicles will improve air quality standards to an acceptable level by the time the development is ready for occupation. However, LBHF EH officers have raised concerns that this might not be the case in practice and therefore mechanical ventilation may be required as part of the development in order to ensure that appropriate air quality is provided for future residents. It is recommended that this matter is resolved through the imposition of a condition on any permission requiring the submission, approval and implementation of a ventilation strategy prior to commencement of the development." P. 73, 7.219
113	2724	Local Resident	Thomas Dyton		Environment and Utilities	EU4		The subsequent conditions are set requiring (1) Abatement technologies for boilers as condition (12.24) – for apartments or outside space? (2) NOx emissions standards and air pollution mitigation – in the Planning Committee discussion this seemed to refer purely to air conditioning. 12.25 PRE-COMMENCEMENT – Air Quality (Low Emissions Strategy) Prior to the commencement of the development a Low Emission Strategy shall be submitted to and approved in writing by the local planning authority. The Low Emission Strategy must address the results of the Air Quality Assessment and detail the remedial action and mitigation measures that will be implemented to protect residential receptors (e.g. abatement technology for energy plant, design solutions). This Strategy must make a commitment to implement the mitigation measures (including NOx emissions standards for the chosen energy plant) that are required to reduce the exposure of on-site and off-site local receptors to poor air quality and to help mitigate the development's air pollution impacts, in particular the emissions of NOx and particulates from on-site and off-site transport and energy generation sources. Evidence must also be submitted to and approved in writing by the local planning authority to show that the CHP and boiler units installed will comply with the relevant emissions standards in the Mayor's SPG 'Sustainable Design and Construction' (2014). Reason: To ensure the development contributes to improvements in air quality in accordance with London Plan (2016) policy 7.14 'Improving Air Quality', LBHF Regulation 18 Local Plan (2015) policy CC9 'Air Quality' and OPDC Regulation 19 Local Plan (2017) policy EU4 'Air Quality'.

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								The pollution consequences of increased “tunneling” of tall buildings on either side of the road were not considered. Strengthening the requirement to meet acceptable air quality standards could set some expectations for (a) absolute maxima for children’s play spaces and outdoor amenity spaces and (b) rigorous monitoring and (c) overall reduction of noise and air pollution to expected maxima prior to developments being inhabited
114	2752	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Environment and Utilities	EU6	6.3	We object to Policy EU6 on waste, which commits to complying with the West London Waste Plan and safeguarding the waste sites in the Channel Gate ‘Place’. Residents have suffered for decades from dust, noise and particulate pollution from these waste disposal and railway maintenance sites, which have not been regulated (partly since the yard under Network Rail is deemed to be private land and its outsourced management company allow ‘dirty’ sites on short-term leases) and controlled in accordance with relevant environmental protection legislation. We wish to see far greater emphasis on waste disposed of at source by Park Royal and Old Oak’s industrial sites, in accordance with the London Plan’s policies. We believe strongly that industrial site owners should not be allowed to regard Old Oak’s ring of waste sites (including the Powerday site) as a catch-all for their failure to invest in ‘circular economy’ thinking and ‘at source’ disposal processes.
114	2753	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Environment and Utilities	EU6	6.3	We object very strongly to Policy EU6 (6.3, p175) seeking to safeguard the Powerday site for meeting the area’s waste needs under the London Plan. Being at close proximity we are constantly affected by odours/dust from Powerday (the company received a UK-record £1 million fine for non-compliance with environmental legislation in 2016). It is clear that the company is unsuited to operate in a residential area. This fundamental mistake will be compounded as the plan’s 25,000 homes are added: the OPDC risks having thousands of residents suffering health issues and pollution in the future, rather than the hundreds that are troubled by them now.
114	2754	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Environment and Utilities	EU6		We object to Policy EU6 envisaging Powerday becoming an energy/CHP site in future; this Local Plan should follow its own/the London Plan’s logic and require industrial sites deal with their own output, site by site.
114	2755	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Environment and Utilities	EU6		We regard Policy EU6, calling for 95% of construction waste to go to landfill or be handled in a secondary materials market involving developers, as both unrealistic. It is also harmful, given the inability of local waste sites like Powerday and Quattro to control pollution like dust and odours and worse, the regular dumping of waste material by rogue builders and smaller contractors that will often be part of developers’ supply chains. We support the aspirations stating that the OPDC, developers and waste firms will have to be far more imaginative in addressing this challenge and substantial resources will have to be invested by these stakeholders, the Environment Agency and local boroughs’ Environmental health departments on policing this activity.
114	2756	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Environment and Utilities	EU4		We welcome Air Quality Policy EU4’s recognition of serious air pollution OPDC area which is a continual and growing worry for local residents.
114	2757	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Environment and Utilities	EU4		We request an extra policy, EU4i), requiring that all major developments’ planning permissions use low emission vehicles during construction.
114	2760	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Environment and Utilities	EU6		We believe that Policy EU6 encouraging higher recycling from new housing is weak and ineffective. Paragraph 6.87 can talk vaguely of “innovation in communal waste collection facilities” and “developers will need to provide residents with appropriate details on how to make best use of their waste collection and storage infrastructure”. Our lives are already blighted by inadequate waste collection and failure of landlords of premises like such as The Clubhouse in North Acton to invest in recycling measures unless pressured to do so by local residents. We think the Local Plan needs to place full responsibility on developers find smarter ways to manage domestic waste removal and new ideas for recycling and build these measures into new housing’s planning applications and approvals. Unless the corporation does so, problems of street litter, domestic waste dumping and fly-tipping associated with over-development and unregulated / regulated rented properties and high-rise property, will become worse for everyone.
115	2779	Local Resident	Nye Jones		Environment and Utilities	EU6	6.3	TITRA objects to Policy EU6 on waste which commits to complying with the West London Waste Plan and safeguarding the waste sites in the Channel Gate ‘Place’ and Powerday at Old Oak Siding. Residents have suffered for decades from dust, noise and particulate pollution from the Euroterminal’s waste disposal and railway maintenance sites and want controls in line with environmental protection legislation. TITRA’s residents wish to see far greater emphasis on waste disposed of at source by Park Royal and Old Oak’s industrial sites, in accordance with the London Plan’s policies. We believe strongly that industrial site owners should not be allowed to regard Old Oak’s ring of waste sites as a catch-all for their failure to invest in ‘circular economy’ thinking and ‘at source’ disposal processes.
115	2780	Local Resident	Nye Jones		Environment and Utilities	EU6	6.3	TITRA objects very strongly to Policy EU6 (6.3, p175) seeking to safeguard the Powerday site for meeting the area’s waste needs under the London Plan. As TITRA residents are still continually troubled by odours/dust from Powerday (the company received a UK-record £1 million fine for non-compliance with environmental legislation in 2016), it’s clear that the company is incapable of complying with environmental legislation so it can operate in this residential area. This fundamental mistake will be compounded as the plan’s 25,000 homes are added: the OPDC risks having thousands of residents suffering health issues and pollution in the future, rather than the ‘mere hundreds’ troubled by them now.
115	2781	Local Resident	Nye Jones		Environment and Utilities	EU6		TITRA objects very strongly to Policy EU6, envisaging Powerday becoming an energy/CHP site in future; this Local Plan should follow its own/the London Plan’s logic and require industrial sites deal with their own output, site by site.
115	2782	Local Resident	Nye Jones		Environment and Utilities	EU6		TITRA regards Policy EU6, calling for 95% of construction waste to go to landfill or be handled in a secondary materials market involving developers, as unrealistic. It is also harmful, given the inability of local waste sites like Powerday and Quattro to control pollution like dust and odours and worse, the regular dumping of waste material by rogue builders and smaller contractors that will often be part of developers’ supply chains. TITRA supports the aspiration but states that the OPDC, developers and waste firms will have to be far more imaginative in addressing this challenge and they along with the Environment Agency and local boroughs’ Environmental health departments will have to commit resources to policing this activity in the future.
115	2783	Local Resident	Nye Jones		Environment and Utilities	EU4		TITRA welcomes Air Quality Policy EU4’s recognition of serious air pollution OPDC area which is a continual and growing worry for local residents. TITRA requests an extra policy, EU4i), requiring that all major developments’ planning permissions use low emission vehicles during construction.

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115	2785	Local Resident	Nye Jones		Environment and Utilities	EU6		TITRA believes that Policy EU6 encouraging higher recycling from new housing is weak and ineffective. Paragraph 6.87 can talk vaguely of “innovation in communal waste collection facilities” and “developers will need to provide residents with appropriate details on how to make best use of their waste collection and storage infrastructure”. TITRA residents’ lives are already blighted by inadequate waste collection and failure of landlords to invest in recycling measures unless pressured to do so by local residents. We think the Local Plan needs to place full responsibility on developers to find smarter ways to manage domestic waste removal and new ideas for recycling and build these measures into planning approvals.
118	2829	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Environment and Utilities	EU6	Figure 6.9	Draft Policy EU6 requires that proposals comply with the policies set out within the WLWP. Our client is generally supportive of this policy, however they would like to draw attention to the supporting text at 6.69, which identifies two specific sites within Park Royal that are safeguarded for waste: “a) Twyford Waste Transfer Station; and b) Quattro, Victoria Road.” The supporting text also refers to figure 6.9 which identifies the Twyford Waste Transfer Station as Site 1: It should be noted that our client owns part of the site identified in red as Site 1. This includes the access road (limited right of way to the existing waste site) and the canal side land comprising 22 metre deep x 235 meters in length. Figure 6.9 needs to be updated to reflect the correct land ownership boundaries. Refer to Appendix B for Title Deeds and Plan.
119	2844	Strategic Partner	Wesley Harcourt	Wormwood Scrubs Charitable Trust	Environment and Utilities	EU1		In EU 1 the Plan at point (a) states that developments will be supported which give Metropolitan Open Land (MOL) including Wormwood Scrubs the strongest protection. In the next line it says that “proposals that result in loss or harm (including erosion in the quality) of MOL will only be permitted in very special circumstances and where at least an equivalent quantum and quality of open space is provided. The Trust agrees with the London Borough of Hammersmith & Fulham that the second statement in bullet point a) is not considered to be in accordance with national or London Plan policy on MOL. Paragraph 7.56 in the current London Plan states that ‘Development that involves the loss of MOL in return for the creation of new open space elsewhere is not considered appropriate’; MOL is granted this status for a number of reasons and cannot be ‘offset’ by an equivalent quantum elsewhere.

Transport

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
6	9	Local Resident	Robert Covell		Transport	All		2. You state that the Old Oak area is one of London's most inaccessible areas. That really is a loaded statement and not an objective one. It suggests you are endeavouring to steer the reader into a favourable view of your agenda rather than present facts.... opinion or fact?
11	38	Statutory Consultee	Sue Hardy	NHS Brent CCG	Transport			We welcome the proposal to create good cycling and walking infrastructure and the opportunity this creates to further promote healthy lifestyles. The proposal to retain some open space with inclusive sports and leisure facilities is imperative and will further contribute to creating a positive lifestyle and hopefully lead to a reduction in demand on health services. We would like to stress the importance of sports and leisure facilities being publically accessible and providing appropriate concessions in order to reduce health inequalities. We are concerned about the increased traffic and adverse environmental impact on the health of the population and support initiatives to limit this alongside a commitment to maintain good air quality. It is hoped that some of the positive initiatives and lessons learned from Healthy New Town pilots are adopted such as free bikes, sprinting tracks, outdoor public gyms and discounts on shopping and gym memberships as a reward to hitting 'step targets'. The Mayor's Draft Inequalities Strategy supports the ten healthy streets indicators which will help to reduce health inequalities as well as improve health and wellbeing for everyone.
12	47	Statutory Consultee	Liz Goodwin OBE	LWARB	Transport			LWARB is supportive of the OPDC approach to transport which puts the sustainable transport hierarchy at its core, and includes work to investigate the consolidation of servicing and deliveries through new technologies that support a move to the circular economy such as cloud based freight consolidation, drones and automated vehicles. LWARB welcomes the inclusion of a requirement for the use of consolidation centres where appropriate, and would encourage OPDC to identify how consolidation centres can be phased across the opportunity area.
20	163	Agent	Adam Kindred	CBRE (on behalf of Remavon)	Transport	T4		We support the principle of car free development in this location given the PTAL improvements that are anticipated for the site. We are equally supportive of the principle for a contributing to the delivery of an improved footpath to be provided along the east of Scrubs Lane. However, as correctly identified in the policy, this needs to be considered against the practical challenges in extending the footpath in certain locations along this stretch of road – most notably the challenges in extending this under the existing railway bridge to the south of 151 Scrubs Lane.
28	272	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T1	e)	TfL suggests that this should read 'minimise and mitigate the impact...'
28	273	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T1	7.7	It should be noted that the Healthy Streets Check tool is still undergoing development. Guidance contained in the TfL Streets Toolkit should also be used by developers and referred to in Transport Assessments
28	274	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T2	Figure 7.5	This appears to omit certain streets and footpaths so it should either show all routes or be retitled as 'Strategic Walking Network' to indicate that it is not comprehensive and highlights what are considered the strategic routes
28	275	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T3	a)	The wording in a) is potentially confusing and could be clarified by changing it to: 'deliver and/or contribute to new cycle infrastructure, including new superhighways, quietways and infrastructure identified in the IDP, ensuring that these connect into and support the wider, existing cycle network, such as the Grand Union Canal and National Cycle route 6.'
28	276	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T3		TfL supports the requirement for cycle parking facilities in accordance with London Cycling Design Standards that meet and where possible exceed the minimum standards set out in the London Plan. There is potential for a high cycle mode share to be achieved in the OPDC area and it is important that from the outset this is supported by a generous provision of well designed cycle parking that goes beyond minimum standards and anticipates future increases in demand
28	277	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T3	f)	To ensure that any independent cycle hire operations are complementary to TfL Cycle Hire, the wording in point f) should be amended to: 'deliver and/or contribute towards the provision of cycle hire across Old Oak and Park Royal which may include complementary local cycle hire operations'
28	278	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T3	Figure 7.7	Rather than simply showing 'routes signed for use' it would be more useful if the map could show where there is an aspiration to improve the infrastructure as part of the development of the area e.g. along Scrubs Lane, and how these improved routes would connect into strategic cycle infrastructure. The response to feedback received during the recent public consultation for the East-West Cycle Superhighway between Acton and Paddington has now been published. It has been confirmed that the Wood Lane to Acton section will continue to be developed along the route alignment consulted on with some changes to the detailed proposals. An update on the plans will be published later in 2017.
28	279	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T4		TfL supports the overall approach of limiting car parking and encouraging car free development. This should be the presumption. Where car parking is provided as part of a development, a Parking Design and Management Plan should be submitted.
28	280	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T4	a)	TfL welcomes the overall approach to promote modal shift away from the car in line with the draft MTS. TfL suggests that mode shift is included in the strategic policies with a cross-reference to Policy T4.
28	281	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T4	c)	TfL supports OPDC's policy to promote 80% passive provision for electric car parking spaces as well as 20% active provision.
28	282	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T4	7.35	The last sentence should be amended to read 'OPDC will also work with TfL Taxi and Private Hire and other commercial operators such as car clubs...'

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28	283	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport		7.36	As per proposal 72 of the draft MTS TfL is looking at options for new coach facilities that deliver the benefits of coaches as an affordable mode that reduces car dependence. We recognise that this needs to be balanced against their street presence and their impact on vulnerable road users. We want to work with stakeholders to investigate options to identify and incorporate new coach facilities that are well connected by public transport but offer appropriate highway links to the strategic road network and reduce coach kilometres travelled in London. The OPDC area offers the potential to be such a location being close to strategic highway corridors from the West and offering excellent onward public transport links. We'd like to work with OPDC to investigate this further.
28	284	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T5	Figure 7.11	It should be clarified what rail improvements were assumed and whether improvements to bus services and frequencies in the area were included when assessing the future PTALs presented in Figure 7.11
28	285	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T5	7.37	Proposed Overground Stations/Line Upgrades: TfL suggests that the following sentence is included at the end of paragraph 7.37 for clarification: "Work by TfL developing the design and business case for the proposed new London Overground stations at Hythe Road and Old Oak Common Lane is taking place and final station proposals and arrangements will be dependent on the outcome of this work. Joint work with TfL is also examining what capacity and accessibility upgrade and connectivity measures are needed at North Acton and Willesden Junction Stations and also to the North London and West London Lines line to accommodate the planned growth which may include new rail infrastructure and rolling stock."
28	286	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T5	7.38	Rather than referring to a station square as the preferred design solution for all new or redeveloped stations, the wording should be more flexible to allow for alternative public realm solutions that may emerge from design and development work. TfL suggests that 'station public realm and / or squares' would be more appropriate for the area around the new HS2/GWML/Elizabeth Line station at Old Oak Common. The need for flexibility also applies to the numerous references to station squares in the Places chapter.
28	287	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T5	Figure 7.12	The notation on the map should make a distinction between existing and potential rail infrastructure. The potential Elizabeth line link to the WCML is labelled as such, but Old Oak Common Lane, Hythe Road and the new HS2/GWML/Elizabeth line station are shown on the map as if they were existing stations. This also applies to a number of other maps and references to London Overground stations e.g. figure 3.3 noted above.
28	288	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T5	Figure 7.12	It should be noted that the potential Elizabeth line link to the WCML is not referred to in the draft MTS and is not seen as a priority by TfL.
28	289	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T6		This section should state explicitly that long term plans for the future bus network in the area will be developed in line with the recently produced Bus Strategy 'Old Oak Park Royal - Indicative bus network and infrastructure requirements'. It would be helpful if OPDC now worked closely with TfL to help to develop an interim phasing bus strategy to enable good public transport access to development as it is delivered over time. It is likely that there will need to be bus priority measures and these should be planned for as part of the strategy development work.
28	290	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T6	a)	This section should also confirm a requirement for the new or improved highways that are shown on figure 7.14 to be designed to safely accommodate potential bus routes - with swept path analysis, operational requirements and the infrastructure changes identified in the Bus Strategy fully considered alongside design requirements for other modes. Policy T6a) should read 'facilitate, deliver and contribute to bus network and infrastructure, including ...'
28	291	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T7	7.59 - 7.63	For consistency with TfL guidance and the main policy wording references in these paragraphs should be made to Construction Logistics Plans (or CLPs)
28	292	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Transport	T7	7.65	It may be useful to include a couple of examples e.g. Use of construction hoarding to display wayfinding information, including diversionary routes, across the site would be encouraged. Hoarding space could also be allocated to provide clear information on the construction plans, timescales, and state key contacts if people have any specific comments or concerns.
30	333	Local Authority	Steve Barton	London Borough of Ealing	Transport	T7		There should be a clear policy on loading specifying it is off street. Loading on street causes many issues such as congestion, blocking cycle lanes, bus reliability etc. All loading should therefore be off street.
30	334	Local Authority	Steve Barton	London Borough of Ealing	Transport	T4		There is no policy on blue badge/disabled parking.
30	335	Local Authority	Steve Barton	London Borough of Ealing	Transport	T5		LBE fully endorse the policy to ensure routes and spaces within stations are integral parts of the local street frontage. To date designs for HS2 station do not do this, and we see it as vital. LBE would like to see the main station entrances at the same level as interchanges with bus, taxis, drop off points and cycle parking.
30	336	Local Authority	Steve Barton	London Borough of Ealing	Transport	T3		Would like to see a policy that ensures adequate secure cycle parking at all destination points across the area – shops, stations, medical centres, leisure and employment etc.
30	337	Local Authority	Steve Barton	London Borough of Ealing	Transport	T7		LBE supports the proposal for consolidation centres but would like the policy to state that the final delivery should be made using ULEVs
30	338	Local Authority	Steve Barton	London Borough of Ealing	Transport	T8		Preferred routes for construction traffic should to minimise the impact on existing residents. HS2 already has such a proposal however, the combined impact of HS2 and other developments will need to be considered.
30	339	Local Authority	Steve Barton	London Borough of Ealing	Transport	T1		Any reference to widening Victoria Road into a dual carriageway should be removed. This was an HS2 proposal that LBE successfully challenged.
30	362	Local Authority	Steve Barton	London Borough of Ealing	Transport	T1	7.8	Would like to see segregated cycle lanes more than just "supported". LBE will be seeking to equip all major routes in the Borough with segregated cycle lanes. With new roads, this is the opportunity to get them in at the beginning rather than having to retrofit at great expense or with compromises. All through routes should have complete segregation and other route have light segregation.

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30	363	Local Authority	Steve Barton	London Borough of Ealing	Transport	T1	7.9	The first sentence of para 7.9 doesn't make a great deal of sense. "through routes should be designed to discourage through traffic"? I think what is trying to be said is that "all routes should be designed to discourage through traffic."
30	364	Local Authority	Steve Barton	London Borough of Ealing	Transport	T2	7.15	Walking policies – would like to see "high quality walking environment" (para 7.15) defined a little further – to incorporate street trees, removal of street clutter and include good street furniture such as seating and places to dwell.
30	365	Local Authority	Steve Barton	London Borough of Ealing	Transport	T3	7.26	Would like to see "employers businesses and land owners should invest in [cycling] infrastructure" bumped up to "must invest". Also in 7.26 the training and awareness should be given to employers not just employees – influence the influencers.
30	366	Local Authority	Steve Barton	London Borough of Ealing	Transport	T3	7.27	Cycle parking (7.27) should ideally be covered by CCTV as well as being secure, sheltered etc.
30	367	Local Authority	Steve Barton	London Borough of Ealing	Transport	T3	7.27	Also in 7.27, we have had issues with cycle parking being all on the ground floor in tower blocks – this creates an inactive frontage and has led to mass thefts. If cycle parking can be split across all floors of tower blocks (with appropriate lifts) it would improve security.
30	368	Local Authority	Steve Barton	London Borough of Ealing	Transport	T3	7.28	With dockless cycle hire this para has now been superseded and needs to be changed.
30	369	Local Authority	Steve Barton	London Borough of Ealing	Transport	T4	7.32	The draft MTS offers the potential for parking levies. This could be a useful tool in OPDC where much of the employment parking is in private off-street car parks and a CPZ would be ineffective.
30	370	Local Authority	Steve Barton	London Borough of Ealing	Transport	T4	7.33	Car club bays should be 100% electric vehicles
30	371	Local Authority	Steve Barton	London Borough of Ealing	Transport	T4	7.34	To ensure access to electric vehicle charging points all lamp columns should be front of kerb and come pre-converted to allow cable charging from the columns.
30	372	Local Authority	Steve Barton	London Borough of Ealing	Transport	T4	7.35	Source London is not the only supplier of electric charging points. At some point it may be economic for Councils to take over the supply, therefore, this should be changed to a more generic term.
30	373	Local Authority	Steve Barton	London Borough of Ealing	Transport	T4	7.36	The sentence "OPDC will work with TfL to deliver fully accessible taxi ranks where required would be better after the following sentence beginning "where specific development types..."
30	374	Local Authority	Steve Barton	London Borough of Ealing	Transport	T6	7.44 7.48	Paras 7.44 and 7.48 repeat themselves to a great extent.
30	375	Local Authority	Steve Barton	London Borough of Ealing	Transport	T6	7.46	This should acknowledge the need for segregated cycle lanes on bus corridors
33	418	Strategic Partner	Mark Furnish	Sport England	Transport	T1 T2 T3		Sport England supports that requirement in Policy T1: Roads and Streets that the street network is delivered in line with Healthy Streets for London and recommend that along with, or instead of, applicants having to use the Healthy Streets guidance as a checklist (as advised in paragraph 7.7) that the Active Design checklist is used, which would incorporate the principles of Healthy Streets (and is featured in the Active Design guidance), so that an overall 'activity' assessment of a proposal has been undertaken rather than just focussing on a healthy and active street angle. This would also incorporate requirements of other policies, such as Policy T3: Walking and Cycling, that seeks to support active modes of travel.
36	474	Statutory Consultee	Julietta McLoughlin	Mayor of London	Transport	T5		The development of the design and business case for proposed new London Overground stations at Hythe Road and Old Oak Common Lane is taking place and final station proposals and arrangements will be dependent on the outcome of this work. The stations are not yet committed or funded and should be referred to as 'potential' new stations throughout the document.
36	475	Statutory Consultee	Julietta McLoughlin	Mayor of London	Transport	T5		Joint work is examining what capacity and accessibility upgrade and connectivity measures are needed at North Acton and Willesden Junction Stations, and also to the North London and West London Lines line to accommodate the planned growth which may include new rail infrastructure and rolling stock.
36	478	Statutory Consultee	Julietta McLoughlin	Mayor of London	Transport	T4		The Mayor supports the overall approach of limiting car parking and encouraging car free development as well as the proposed requirement for 80% passive provision for electric car parking spaces as well as 20% active provision.
36	479	Statutory Consultee	Julietta McLoughlin	Mayor of London	Transport	T3		The Mayor supports the proposed requirement for cycle parking facilities in accordance with London Cycling Design Standards that meet and where possible exceed the minimum standards set out in the London Plan.
36	480	Statutory Consultee	Julietta McLoughlin	Mayor of London	Transport	T6		Long term plans for the future bus network in the area should be developed in line with the recently produced Bus Strategy (Old Oak Park Royal - Indicative bus network and infrastructure requirements). It would be helpful if the OPDC worked closely with TfL to help to develop an interim phasing bus strategy to enable good public transport access to development as it is delivered over time. It is likely that there will need to be bus priority measures and these should be planned for as part of the strategy development work.
36	482	Statutory Consultee	Julietta McLoughlin	Mayor of London	Transport	T5		Any proposals for potential long-term redevelopment that affected operational rail facilities including train maintenance depots at Willesden and North Pole would need to take account of future operational needs. Any de-designation of rail sites would be subject to standard rail industry procedures and consultation.
37	489	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	Transport			The plan's transport policies rightly point out how Old Oak will become one of the most connected areas in the United Kingdom. These transport links, from across London and the UK, are critical to the area's success. We believe the developments provide a unique opportunity for Old Oak Common to become a major catalyst for connecting London to Birmingham as a major development interchange centre. To this end, we see a strong case for a fundamental redesign of the interchange at Old Oak Common between High Speed 2 and Crossrail to create a major hub with future potential for connection High Speed 1 to the junction.
37	490	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	Transport			ACE is also supportive of the 'healthy streets' approach in the plan's transport policies and believe this outlook will help ensure the communities thrive. Focusing transport policies on people, such as the promotion of walking and cycling infrastructure, will encourage a more active, engaging and sustainable lifestyle in the area.
37	500	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	Transport	All		We agree that current and planned transport connections are the catalyst for the comprehensive regeneration of Old Oak and for strengthening and intensifying Park Royal. They make the proposed developments feasible. ACE is a strong supporter of the use of the 'healthy streets' approach in the transport policies which we believe is critical for creating vibrant communities. To this end, we support the

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								requirement for development applicants to use the Healthy Street Guidance to inform the design of streets. The focus on walking infrastructure is positive. Investments in walking infrastructure will encourage people to use this more sustainable mode of transport when travelling short distances. We also support OPDC's commitment to support proposals that contribute 'Legible London' wayfinder signs to the network as this is a simple solution to make streets friendlier for pedestrians. ACE supports OPDC's cycling policy, particularly the delivery of a comprehensive cycle network connecting cyclists to other transport infrastructure. As noted in the plan, the vast majority of current workers in Park Royal live within cycling distance yet only 3% chose to commute by bike. We agree that more well-designed cycle routes will help increase this number. ACE is particularly interested in the plan's rail policy. Rail connections to other places in London and across the UK are critical for the area's success. The developments provide a unique opportunity for Old Oak Common to become a major catalyst for connecting London to Birmingham as a major development interchange centre. We believe Old Oak Common should be viewed as a single transport corridor, connecting London to the Midland's Engine and beyond to the Northern Powerhouse. We therefore see a strong case for a fundamental redesign of the interchange at Old Oak Common between High Speed 2 and Crossrail to create a major hub with future potential for connecting High Speed 1 to the junction. By becoming one of the most connected places in the UK, we support OPDC's desire to ensure Old Oak Common Railway Station is a world class facility and we believe this should be reflected in its design. We note that Rotterdam Central Station was flagged as a 'precedent development' for Old Oak Common Railway Station and we believe a similar ambitious design could be showpiece for the British industry. Lastly, OPDC's transport policy on construction vehicles during redevelopments and requiring proposals to demonstrate how they will reduce construction trips is prudent, however some level of disruption during the construction phase will need to be accepted. We are also interested in OPDC's suggestion that developers could maximise the use of water infrastructure during construction, particularly the Grand Union Canal, and believe this could be a precedent for increasing the use of our canal network for freight.
44	640	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Transport	T1		We support the OPDC's approach to Healthy Streets in Policy T1.
47	706	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Transport	T6	Figure 7.14	The Council recommends that Figure 7.14 be modified to indicate a potential future bus link between Scrubs Lane and Ladbroke Grove to the north of Little Wormwood Scrubs This will be necessary to provide adequate public transport accessibility to the proposed residential led area north of Little Wormwoods Scrubs.
47	707	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Transport	T5	Figure 7.12	It is also recommended that Figure 7.2 be modified to indicate the potential Elizabeth Line station at Kensal Canalside. This Figure currently includes other potential non committed items of infrastructure so in that context it is inconsistent that the Kensal Canalside station has been omitted. This project is advancing rapidly with the Council about to enter into GRIP 2 for the station development with Network Rail. This needs to be acknowledged.
49	750	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Transport	T1		Road congestion is still considered Park Royal's most pressing problem by businesses. Although the area benefits from an access to major roads linking the estate to the rest of London, the A406, A40 and A404 are invariably congested and this cause delays in the movement of people and goods in and out of Park Royal. The roads within the estate are often grid-locked, also delaying movement of vehicles and hampering business efficiency. The roads could also benefit from better maintenance and repair.
49	751	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Transport			If the road network in Park Royal is to be improved to provide additional capacity and faster movement of freight, people need to be encouraged to leave their cars at home. This means improving the public transport network with more buses that are reliable and frequent, improved cycling facilities and an improved public realm encouraging people to walk.
49	752	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Transport			While considering new transport strategies for the Old Oak and Park Royal area, ODPC should take into consideration rapidly evolving technological development such as autonomous vehicles and Smart Cities technology to support this modal shift.
49	753	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Transport	T3		PRBG welcomes OPDC's support to the delivery of a comprehensive cycle network that provides facilities for cyclists, as we believe it will encourage employees travelling to Park Royal to choose this mode of transport over cars. We also agree that investments in "end-of-journey" cycle facilities in the form of secure cycling parking, lockers and showers are also vital.
49	754	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Transport	T4		PRBG also support the development of car club bays in Park Royal, as well as sufficient charging points to encourage the uptake of electric vehicles.
49	755	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Transport			We welcome that there is clearly acceptance that unless there are better transport solutions (consolidation of public transport and reduction in car traffic), intensification will further aggravate Park Royal's congestion problem.
49	756	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Transport			We welcome that Green travel plans will be expected at a site level for new schemes, however it is vitally important that a strategic approach is pursued to transport infrastructure improvement. The Park Royal Transport Strategy offers a long list of interventions. If chapter 3 of the Infrastructure Delivery Plan is to be seen as a shortlisting/ prioritisation exercise, we would encourage further dialogue with the local business community to clarify the highest priority interventions. We would particularly like to see more detail in the Infrastructure Delivery Plan regarding the timing and implementation of: • PL6: HGV corridors [in Park Royal] • PT1: Modified bus services in the Park Royal area • PT2: Shuttle bus services
49	757	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Transport	T6		We would suggest that a detailed study by OPDC with Transport for London to support PT1 would provide the deeper understanding of existing/ potential employee bus users in Park Royal and whether a dedicated Park Royal commuter shuttle bus service (PT2) would also be of value to connect employment sites with the ring of stations around Park Royal.

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55	828	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Transport	T4	a)	Part a) of the draft Policy seeks to limit car usage, and therefore parking, across the OPDC area. For commercial development, the requirement is car-free “unless in certain cases limited car parking can be justified when operational or business needs and access to public transport are taken into account”. Whilst SEGRO accepts that this approach is necessary and justified where new town centre uses are proposed in highly accessible locations, SEGRO does not consider this approach to be appropriate in the context of industrial development. This sector operates in a very different way to office, retail and leisure uses for instance, and an element of car parking is, and will continue to be, a necessary requirement for industrial space to operate successfully and to attract quality occupiers. The area is also an established industrial area, where there are established patterns on travel, with specialist uses in the area, some flexibility is required for commercial car parking.
55	829	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Transport	T7	a)iii)	Part a) iii) of the draft Policy encourages the use of freight consolidation centres where appropriate. Firstly, SEGRO queries whether this Policy is intended to be relevant across the whole OPDC area? It appears to be more relevant to the Old Oak part of the OPDC area, given that one of the primary roles of the Park Royal area is urban logistics, which involves the transition of goods from larger vehicles to smaller vehicles for transport to their final destination (as per the Plan's definition of ‘consolidation centre’). SEGRO requests that the spatial coverage of the Policy is clarified. Secondly, it is unclear where these centres might be located, how they are expected to be delivered, how they are intended to operate etc. The evidence base also appears to be very light on this particular topic. SEGRO requests that this part of the Policy is considered in more detail, with clear wording and visibly supported by detailed and relevant evidence
55	830	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Transport	T7	d)	Part d) of the draft Policy refers to maximising the use of ‘last mile deliveries by sustainable modes’. SEGRO supports the reference to the last mile service. As set out in the ‘Keep London Working’ report, this service is of fundamental importance to London successfully operating as a 24-hour City. SEGRO also supports the reference to achieving this service sustainably, as SEGRO is at the forefront of utilising efficient and sustainable last mile transport solution. SEGRO suggests that the principle of last mile deliveries is given even greater support and visibility within the Plan, given that this is a core function of Park Royal, both locally and strategically.
56	914	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Transport	Para 7.2		Is “exceptional” the right word here? “Exemplary” or “excellent” might be better
56	915	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Transport	T1	d)	“All relevant standards” what are they? Shouldn't there be something here about on-street electric car charging points and disabled parking?
56	916	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Transport	T3		LBHF supports the provision of comprehensive cycling routes and networks across the OPDC area.
56	917	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Transport	T4		This section seems to assume that all parking will be off-street. But given that this is minimal, will there be adequate provision for electric vehicle charging and disabled parking? (see above) The Council also supports the car provision standards, however, is keen to ensure there is adequate public transport provision, such as bus routes especially in the early phases of development.
56	918	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Transport	T5	k)	Typo: “pioener”
56	919	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Transport	Para 7.37		Typo: The three new stations include are:
56	920	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Transport	Para 7.44		“Buses provide...a more cost effective...” More cost effective than what? Delete “more”
56	921	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Transport	Para 7.49		“Green” bus provision paragraph needs to be stronger. Something like “only zero tailpipe emission buses will be allowed to operate in the OPDC area.
57	960	Local Resident	Scott Cawley		Transport	T1		Traffic in Harlesden will be badly affected during and after construction of the OPDC zone. Already the area suffers from terrible traffic problems because of heavy industrial vehicles (car transporters for Car Giant, plant and heavy machinery, HGVs and articulated lorries delivering to the scrap metal plants currently in the OPDC area) using the town centre as a cut through to avoid congestion at Hangar Lane and on the A40 into central London. This will only increase once construction traffic uses Harlesden High Street/Harrow Road/Scrubs Lane/Old Oak Common Lane/Station Road - and other local roads. Once the area is built, because it is (rightly, in my view) intended to be a no car zone there will however be increased traffic skirting round the edges of the area to visit and service it - and this will cause chaos for local residents. Parking, congestion and air pollution in the surrounding areas will all become worse as a result. There was an earlier suggestion (I am unclear from who) that the OPDC zone would include a by-pass road through it which would mean traffic would be able to avoid Harlesden Town Centre - bringing great benefits to local residents (which the OPDC suggests it intends to do) - why can this not happen?
57	964	Local Resident	Scott Cawley		Transport	T1 T3		Within two separate consultation events the hilly nature of the area was discussed. Initially, within the transport event, after a member of the public asked if there would be a way to mitigate some of this to make it easier to cycle (along Scrubs Lane, for instance) it was suggested yes, it would be possible to do something with that. But in a later event (I don't remember which, unfortunately) it was mentioned that the area was hilly and that there was little that could be done to change this. I don't think people are suggesting the OPDC area should be

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								completely flat to sea-level, but I was confused by these two statements suggesting it would, then it wouldn't be possible to work with the topography of the area to make things easier/better for pedestrians/cyclists/transport etc.
57	967	Local Resident	Scott Cawley		Transport	H3		Finally, I would like to voice my support for your plans on cycling - there was some negativity at the OPDC transport events from middle aged people who were exasperated at the thought of getting on a bike for the first time in their life and would be unwilling to change their habits. Just as how Brexit should be dealt with, I think you should consider the views of younger people more when you survey the public for views - if this development is going to take up to 20 years to build, it will be the young who will have most exposure to, and will be most affected by your plans. Things that young people want - like cycling - should be considered more highly within this consultation.
68	1042	Community Group	Martin Cain	Friary Park Preservation Group	Transport	T1		There seems to be a lack of clarity about access roads.
68	1043	Community Group	Martin Cain	Friary Park Preservation Group	Transport	T2		The emphasis on walking routes show a lack of consideration for the elderly and disabled.
68	1044	Community Group	Martin Cain	Friary Park Preservation Group	Transport	T3		The emphasis on cycling routes show a lack of consideration for the elderly and disabled.
68	1045	Community Group	Martin Cain	Friary Park Preservation Group	Transport	T4		There seems a lack of parking.
68	1046	Community Group	Martin Cain	Friary Park Preservation Group	Transport	T5		The lack of commitment by the government to funding HS2 is a serious problem
68	1047	Community Group	Martin Cain	Friary Park Preservation Group	Transport	T6		There is a lack of information about new bus routes through the development or connecting the proposed new train stations.
68	1048	Community Group	Martin Cain	Friary Park Preservation Group	Transport	T8		Policy is sound (no justification provided)
68	1049	Community Group	Martin Cain	Friary Park Preservation Group	Transport	T9		Emphasis on cycling and walking fails conspicuously to address the transport needs of the elderly and disabled.
70	1094	Local Resident	Joanna Betts		Transport			There are also concerns about the possible 9 metre-wide TFL 'cycle bridge' across Old Oak Common Land, and even bigger concern about OPDC/TFL's ambitions to change this into a bridge for buses. This would have a massive impact on Kildun Court, Wells House Road and Midland Terrace residents in terms of visual impact, noise and air pollution, as well as negatively impacting on property prices. The original plan was for a tunnel and we require justification as to why this can't remain a tunnel. TFL made it clear that the cost of a bridge versus a tunnel is similar, but that this fulfils OPDC's ambition for a through-road to North Acton, albeit with a total disregard to the local community. Indeed, we question the High Street that, on the maps, comes out directly above Wells House Road and would feed traffic onto the already congested Old Oak Common lane.
70	1098	Local Resident	Joanna Betts		Transport			There is also a concern about the unrealistic desire to make the area a car-free zone, thereby penalising elderly, disabled and people with large families who are reliant on cars.
75	1146	Community Group	Henry Lancashire	Brent Cyclists	Transport	T1		We welcome a "Healthy Streets" approach, however this must not be considered above the Sustainable Transport Hierarchy.
75	1147	Community Group	Henry Lancashire	Brent Cyclists	Transport	T1		We support the plan to "implement maximum speeds of 20mph on all local roads", and suggest this should apply to all roads within the development area, and suitable roads leading to the development area.
75	1148	Community Group	Henry Lancashire	Brent Cyclists	Transport	T1	7.9	We partly support aim 7.9 "Any new through routes created as part of a proposed development to be used by general traffic should be designed to discourage through traffic including traffic calming and controlled crossing facilities." 7.9 Discouragement is not sufficient, general traffic, in particular private motor traffic must be prevented from traveling through the newly developed area. 7.9 Traffic calming should be avoided due to its negative impacts on vulnerable road users, in particular cyclists, in favour of street designs which force slower speeds. Best standard international examples include Woonerfe and SpielstraÃŸen. 7.9
75	1149	Community Group	Henry Lancashire	Brent Cyclists	Transport	T1		Controlled crossing facilities must be supported by informal and uncontrolled crossing facilities along the length of streets. Pedestrians must not be forced to use particular crossing points. Barriers and staggered crossings must be avoided.
75	1150	Community Group	Henry Lancashire	Brent Cyclists	Transport	T1	Figure 7.3	We do not support the inclusion of figure 7.3, shared space is unsuitable where a street is expected to act as a through route for cycling and pedestrian footfall is high. Separate infrastructure must be provided throughout the development.
75	1151	Community Group	Henry Lancashire	Brent Cyclists	Transport	T2		Pedestrians must never be required to share space with other road users, unless speeds and number of vehicle movements are very low. This must be stated in the Local Plan.
75	1152	Community Group	Henry Lancashire	Brent Cyclists	Transport	T3		We do not support the use of "quietway" and "superhighway" as terms for routes, all routes must be built to the highest standard, which is almost never achieved on "quietway" routes, and not consistently achieved on "superhighway" routes.
75	1153	Community Group	Henry Lancashire	Brent Cyclists	Transport	T3		Figure 7.7 shows a route map which will not achieve a connected network of routes, in particular within Park Royal. All new roads are specified as "quieter routes", however these routes are unlikely to be quiet, especially the route along the planned High Street.

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75	1154	Community Group	Henry Lancashire	Brent Cyclists	Transport	T3		We support the aim to increase cycling to Park Royal. This can only be achieved with a joined up network of high quality routes.
75	1155	Community Group	Henry Lancashire	Brent Cyclists	Transport	T3		[Not consistent with policy] The London Cycling Design Standards [LCDS] are only cited with respect to cycle parking. The LCDS must be applied to all roads, junctions, new cycle infrastructure, construction, and public areas within the consultation area.
75	1160	Community Group	Henry Lancashire	Brent Cyclists	Transport	T3		We strongly support the statement that "Infrastructure should meet design standards set by LCDC for gradient, surface quality and cater for all types of users." However, we are concerned that this is not included within the Local Plan proper.
79	1206	Local Resident	David Craine		Transport	T4		This strategy, especially the 0.2 sites per unit parking policy will be important in mitigating the very real risk of traffic congestion in the surrounding areas.
79	1207	Local Resident	David Craine		Transport	T5		I support the rail proposals including the 3 new statins, which can support public access to the main stations, without disruption the area as a destination in its own right. Consideration should be given to opening up the West Coast Main Line platform at Willesden Junction for more stopping trains so they connect with the area and are able to connect easily to Crossrail and HS2.
81	1234	Community Group	Chloe Fremantle	ArtWest	Transport		7.1 and 7.2	we support these intentions of the OPDC
81	1235	Community Group	Chloe Fremantle	ArtWest	Transport	T4	a)iii)	some provision of parking spaces would be needed for deliveries and for occasional use for any artists' workspaces.
81	1236	Community Group	Chloe Fremantle	ArtWest	Transport	T7		We support this policy.
82	1251	Neighbourhood Forum	Henry Peterson	St Quintin and Woodlands Neighbourhood Forum	Transport	ALL		In the Local Plan, we see no evidence that Transport Policies T1-T9 will prove effective. Levels of traffic congestion in the area are already severe.
82	1252	Neighbourhood Forum	Henry Peterson	St Quintin and Woodlands Neighbourhood Forum	Transport	T1		The Plan offers no solution to the traffic pinch point at the exit westwards at North Pole Road/Wood Lane.
83	1276	Local Resident	Nadia Samara		Transport			There are also concerns about the possible 9 metre-wide TFL 'cycle bridge' across Old Oak Common Land, and even bigger concern about OPDC/TFL's ambitions to change this into a bridge for buses. This would have a massive impact on Kildun Court, Wells House Road and Midland Terrace residents in terms of visual impact, noise and air pollution, as well as negatively impacting on property prices. The original plan was for a tunnel and we require justification as to why this can't remain a tunnel. TFL made it clear that the cost of a bridge versus a tunnel is similar, but that this fulfils OPDC's ambition for a through-road to North Acton, albeit with a total disregard to the local community. Indeed, we question the High Street that, on the maps, comes out directly above Wells House Road and would feed traffic onto the already congested Old Oak Common lane.
83	1280	Local Resident	Nadia Samara		Transport			There is also a concern about the unrealistic desire to make the area a car-free zone, thereby penalising elderly, disabled and people with large families who are reliant on cars.
84	1303	Local Resident	Nicholas Kasic		Transport			There are also concerns about the possible 9 metre-wide TFL 'cycle bridge' across Old Oak Common Land, and even bigger concern about OPDC/TFL's ambitions to change this into a bridge for buses. This would have a massive impact on Kildun Court, Wells House Road and Midland Terrace residents in terms of visual impact, noise and air pollution, as well as negatively impacting on property prices. The original plan was for a tunnel and we require justification as to why this can't remain a tunnel. TFL made it clear that the cost of a bridge versus a tunnel is similar, but that this fulfils OPDC's ambition for a through-road to North Acton, albeit with a total disregard to the local community. Indeed, we question the High Street that, on the maps, comes out directly above Wells House Road and would feed traffic onto the already congested Old Oak Common lane.
84	1307	Local Resident	Nicholas Kasic		Transport			There is also a concern about the unrealistic desire to make the area a car-free zone, thereby penalising elderly, disabled and people with large families who are reliant on cars.
85	1330	Local Resident	Francis, Marc and Caroline Sauzier		Transport			There are also concerns about the possible 9 metre-wide TFL 'cycle bridge' across Old Oak Common Land, and even bigger concern about OPDC/TFL's ambitions to change this into a bridge for buses. This would have a massive impact on Kildun Court, Wells House Road and Midland Terrace residents in terms of visual impact, noise and air pollution, as well as negatively impacting on property prices. The original plan was for a tunnel and we require justification as to why this can't remain a tunnel. TFL made it clear that the cost of a bridge versus a tunnel is similar, but that this fulfils OPDC's ambition for a through-road to North Acton, albeit with a total disregard to the local community. Indeed, we question the High Street that, on the maps, comes out directly above Wells House Road and would feed traffic onto the already congested Old Oak Common lane.
85	1334	Local Resident	Francis, Marc and Caroline Sauzier		Transport			There is also a concern about the unrealistic desire to make the area a car-free zone, thereby penalising elderly, disabled and people with large families who are reliant on cars.
87	1377	Local Resident	Patrick Munroe		Transport			There are also concerns about the possible 9 metre-wide TFL 'cycle bridge' across Old Oak Common Land, and even bigger concern about OPDC/TFL's ambitions to change this into a bridge for buses. This would have a massive impact on Kildun Court, Wells House Road and Midland Terrace residents in terms of visual impact, noise and air pollution, as well as negatively impacting on property prices. The original plan was for a tunnel and we require justification as to why this can't remain a tunnel. TFL made it clear that the cost of a bridge versus a tunnel is similar, but that this fulfils OPDC's ambition for a through-road to North Acton, albeit with a total disregard to the local community. Indeed, we question the High Street that, on the maps, comes out directly above Wells House Road and would feed traffic onto the already congested Old Oak Common lane.

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87	1381	Local Resident	Patrick Munroe		Transport			There is also a concern about the unrealistic desire to make the area a car-free zone, thereby penalising elderly, disabled and people with large families who are reliant on cars.
88	1404	Local Resident	Lily Gray		Transport			There are also concerns about the possible 9 metre-wide TFL 'cycle bridge' across Old Oak Common Land, and even bigger concern about OPDC/TFL's ambitions to change this into a bridge for buses. This would have a massive impact on Kildun Court, Wells House Road and Midland Terrace residents in terms of visual impact, noise and air pollution, as well as negatively impacting on property prices. The original plan was for a tunnel and we require justification as to why this can't remain a tunnel. TFL made it clear that the cost of a bridge versus a tunnel is similar, but that this fulfils OPDC's ambition for a through-road to North Acton, albeit with a total disregard to the local community. Indeed, we question the High Street that, on the maps, comes out directly above Wells House Road and would feed traffic onto the already congested Old Oak Common lane.
88	1408	Local Resident	Lily Gray		Transport			There is also a concern about the unrealistic desire to make the area a car-free zone, thereby penalising elderly, disabled and people with large families who are reliant on cars.
92	1486	Community Group	Tom Ryland	Hammersmith Society	Transport	T1		The area must be open to all and not gated in the manner of Canary Wharf : To this end all roads should be adopted.
92	1582	Community Group	Tom Ryland	Hammersmith Society	Transport	T1		All roads/streets should be adopted, not private.
92	1623	Community Group	Tom Ryland	Hammersmith Society	Transport			T1 – T9: We support the Policies with the following comments and reservations. In principle, we do not consider the policies are sufficiently radical or forward thinking and as such we consider the Plan is not positively planned and is therefore not effective or sound.
92	1632	Community Group	Tom Ryland	Hammersmith Society	Transport	T4		We do not support the proposal by the West London Line Group for the West London Line that involves construction over Little Wormwood Scrubs.
92	1633	Community Group	Tom Ryland	Hammersmith Society	Transport	T8		We very much hope that the railway network in the area is used to maximum advantage in the construction stages so that both materials and spoil are transported by rail or the canal, rather than by road, thus relieving local residents and the local road network of the burden and disruption,
92	1638	Community Group	Tom Ryland	Hammersmith Society	Transport	T2	Figure 7.5	This same map has also been redrawn to add the canal and towpath but the A40 and A406 should not be indicated as designated walking routes.
92	1639	Community Group	Tom Ryland	Hammersmith Society	Transport	T6	Figure 7.14	There is a map Figure 7.14 : p.207) showing 'Bus Routes'. However, this does not show which existing routes and which are new proposed. No routes are shown connecting to Old Oak Station which seems an extraordinary omission. We understand that OPDC are in discussion with TFL with a view to rationalizing these to reflect the proposals. We strongly suggest that the map is updated as soon as possible and the format should be colour coded in the style normally used by TFL for its busier routes and nodes.
92	1640	Community Group	Tom Ryland	Hammersmith Society	Transport	T3		We support the view that where possible there should be segregation of heavily used cycle and pedestrian routes. Our preference is that this achieved by use of slightly raised kerbs or levels.
92	1641	Community Group	Tom Ryland	Hammersmith Society	Transport	T1		We think it is an extraordinary omission that although there are quite detailed maps for most of the 'Places', there is no overall under map showing roads and streets as part of Policy T1, and most particularly the intended hierarchy.
92	1642	Community Group	Tom Ryland	Hammersmith Society	Transport	T1	b)	Policy T1.b suggests that the policy should help 'overcome severance, allievate congestion and optimise connectivity both within the development area and to surrounding areas' but gives no indication as to how this could be achieved. This is another example where the Plan must be regarded as not being positively prepared or effective.
92	1643	Community Group	Tom Ryland	Hammersmith Society	Transport	T1		Although we agree with the premise that the emphasis on motor transport should be played down, there needs to be adequate means of access and egress to the OPDC area : On this basis we consider the proposed upgrading of Old Oak Common Lane and Scrubs Lane to be completely inadequate. While we endorse any objectives to make Scrubs Lane into a more pleasant road with the departure of many of the employment uses along the road, there will instead be vehicle movements from within the Old Oak area and no alternative route for all the through traffic which currently overwhelms the capacity of the road. Scrubs Lane and Old Oak Common Lane cannot be considered in isolation either to the road capacity in Harlesden and should be reviewed as a whole.
92	1644	Community Group	Tom Ryland	Hammersmith Society	Transport	T1		A policy should be added to address existing traffic problems, in particular on the north south axis. This is an acute problem for the area and simultaneous congestion in Scrubs Lane and Old Oak Road can lead to the development area effectively being cut off at peak times. Any such policy should prioritise bus lanes.
92	1645	Community Group	Tom Ryland	Hammersmith Society	Transport	T3		We have previously noted the potential conflict between cyclists and pedestrians on the canal : We believe that can be a more general problem and it was clear from the group discussions that most people favour routes that are segregated.
92	1646	Community Group	Tom Ryland	Hammersmith Society	Transport	T3		We also previously recommended the formation of a dedicated [cycle] route adjacent to the Chiltern Line.
93	1752	Residents Association		Wells House Road Residents Association	Transport			There are also concerns about the possible 9 metre-wide TFL 'cycle bridge' across Old Oak Common Land, and even bigger concern about OPDC/TFL's ambitions to change this into a bridge for buses. This would have a massive impact on Kildun Court, Wells House Road and Midland Terrace residents in terms of visual impact, noise and air pollution, as well as negatively impacting on property prices. The original plan was for a tunnel and we require justification as to why this can't remain a tunnel. TFL made it clear that the cost of a bridge versus a tunnel is similar, but that this fulfils OPDC's ambition for a through-road to North Acton, albeit with a total disregard to the local community. Indeed, we question the High Street that, on the maps, comes out directly above Wells House Road and would feed traffic onto the already congested Old Oak Common lane.
93	1756	Residents Association		Wells House Road Residents Association	Transport			There is also a concern about the unrealistic desire to make the area a car-free zone, thereby penalising elderly, disabled and people with large families who are reliant on cars.

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96	1806	Local Resident	John Cox		Transport	T5		Focusing Old Oak development on the HS2 Station as a ('the') destination is not good place-making; it is simply one component of the area. It should be considered to be on the periphery of the 'successful place'.
96	1807	Local Resident	John Cox		Transport	T5		There is a need to relate stations to their 'services' (why are people using a particular station? What are the main groups of users and what are their whole-journey requirements?). On that basis, the best interchange between 'services' and their required stations can be achieved. Connections between stations that are safe, efficient and sheltered are crucial. Commuters between, say, the Thames Valley and office jobs along the West London Line will need (i.e. will be forced) to walk twice a day along Old Oak High Street. Sometimes it rains.
96	1808	Local Resident	John Cox		Transport	T5		Specifically reference to new Overground stations and upgraded North Acton station is necessary in Policy to ensure delivery. Hythe Road Station is essential to Car Giant/Scrubs Lane developments.
96	1809	Local Resident	John Cox		Transport	T5		There is a London-wide need to fiercely protect existing operational railway land. Because of reckless land sales, that already means new railway depots, such as for Thameslink and Chiltern Railways, are having to be built in far from ideal locations.
97	1833	Local Resident	Ralph Scully		Transport			There are also concerns about the possible 9 metre-wide TFL 'cycle bridge' across Old Oak Common Land, and even bigger concern about OPDC/TFL's ambitions to change this into a bridge for buses. This would have a massive impact on Kildun Court, Wells House Road and Midland Terrace residents in terms of visual impact, noise and air pollution, as well as negatively impacting on property prices. The original plan was for a tunnel and we require justification as to why this can't remain a tunnel. TFL made it clear that the cost of a bridge versus a tunnel is similar, but that this fulfils OPDC's ambition for a through-road to North Acton, albeit with a total disregard to the local community. Indeed, we question the High Street that, on the maps, comes out directly above Wells House Road and would feed traffic onto the already congested Old Oak Common lane.
97	1837	Local Resident	Ralph Scully		Transport			There is also a concern about the unrealistic desire to make the area a car-free zone, thereby penalising elderly, disabled and people with large families who are reliant on cars.
98	1854	Strategic Partner	Adam Price	Transport for London (Commercial Development)	Transport	T7		We note that very little reference has been made to coach provision in the OPCD area during the Plan period. Policy T7: Car parking makes provision for coach facilities, but this relates to ancillary coach parking and pick-up. However, consideration should also be given to the potential provision for a coach station facility or interchange in the OPDC area should this function be required on a London-wide basis in the future. Whilst the OPDC area is currently constrained in physical terms, it will provide excellent transport links to much of London and currently has good links to the highway network. Therefore, we believe appropriately located coach facilities would benefit local residents, address wider Mayoral objectives set out in the draft Mayor's Transport Strategy (under proposal 72a) and, crucially, provide the opportunity for the intensification of land. The site of a coach station facility could be fully optimised through the provision of an appropriately designed over-facility-development to provide significant residential or employment floorspace for the OPDC area. We therefore encourage you to consider the exploration of a coach station facility within the OPCD area, mindful of the over-facility opportunities that this could provide. We would be happy to meet with you to further discuss this matter.
99	1855	Residents Association	John Haston	West Twyford Residents Association	Transport			All transport proposals are generally depicted by diagrams, artist impressions illustrative sketches and do not relate to the actual space available at locations – with very few cars shown. All very well to illustrate inter-relationships between transport systems, and show systems by coloured lines – but can the proposals fit the actual space available. There is a lot of existing infrastructure in place and not all sites are a blank canvass like Old Oak. Three examples of the above are :- 1. Scrubs Lane - has 3 / 4 developments approved by OPDC. After approval was given we were then invited to a discussion about traffic management and integration proposals around these buildings. We were shown diagrammatic illustrations of OPDC Development wishes for the area. The space available in Scrubs Lane is there available for measurement. Therefore let us have real drawings with measurements for the proposals. We should have cross sections of the proposed road at various locations showing the footpath, cycle lane, unloading bays, road widths, services zones in footpath and roads, and planting and signage zones. 2. Old Oak Common Lane is a major feeder road to the whole Old Oak development, to existing and new residents (Geneses Housing), the HS2 / Crossrail Station and Depot, a new over ground station is to be built adjacent, and it has to interface with the Western Avenue / A40 and we have no details of any proposed road infrastructure to cater for the above. 3. The A40 junction to the above has a 3 tunnel options proposed - as a solution to keeping the A40 traffic moving and separate from the interchange. A previous tunnel scheme was designed and land purchased and vacated, to accommodate such a tunnel. It would have allowed traffic to flow from the A40 into London unrestricted to Marylebone. However that was long ago and subsequently the vacant land is now being built upon. A draft sketch design drawn on actual scale drawings would have picked this up and the sites reserved for OPDC use.
99	1856	Residents Association	John Haston	West Twyford Residents Association	Transport			To encourage and attract future investment in the area the peripheral road interfaces re the North Circular Road and the A 40 / Western Avenue have to be addressed at the beginning of the Project. All 'ways in and out' are currently congested at peak times.
99	1857	Residents Association	John Haston	West Twyford Residents Association	Transport			In Park Royal there is no great amount of bus lanes, parking on pavements is common and cycling would be only by the brave. The future predicts big increases in traffic, so to keep the rise to a minimum and in keeping with OPDC Policy of 'no cars', - accessible, efficient and affordable public transport spreading out from transport hubs should be a priority.
99	1858	Residents Association	John Haston	West Twyford Residents Association	Transport	T1		Roads and Streets – Different roads for different needs, need 'principal' section drawings showing minimum width footpaths, planting / signage zone, cycle ways where necessary, services zones in footpaths and roads, and differing road widths for the location.
99	1859	Residents Association	John Haston	West Twyford Residents Association	Transport	T2		Walking – this has got to be encouraged but will only happen with good affordable and frequent public transport services. Walkers need space- separate from cyclists. Walkers still need access to zip cars at weekends and random occasions. Good quality streets will encourage people to walk. Look at West Coronation Road for a bad example.

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99	1860	Residents Association	John Haston	West Twyford Residents Association	Transport	T3		Cycling – cyclists need their own space and preferably on either side of the road. This would allow a German system of cycling with the flow of traffic on each side of the road. Where and when cycle space is available, concession/ Boris bikes could be made available at transport hubs and 'cluster' centres. Where there is major employment.
99	1861	Residents Association	John Haston	West Twyford Residents Association	Transport	T4		Parking – has to be accessible so as to discourage the current practice in Park Royal of parking pavement. Parking on or blocking cycle lanes has got to be made a traffic offence.
99	1862	Residents Association	John Haston	West Twyford Residents Association	Transport	T5		Rail Comments – We will concur with any comments the West London Line Group make on behalf of the Grand Union Alliance. We would only add that the connectivity between the stations in Old Oak does not look good on paper diagrams.
99	1863	Residents Association	John Haston	West Twyford Residents Association	Transport	T5		It was said at one OPDC presentation that HS2 and Crossrail Station would be second to Waterloo in passenger movements at 250K passengers daily. Will Crossrail have enough capacity – at that stage of l'ts route into London?
99	1864	Residents Association	John Haston	West Twyford Residents Association	Transport	T6		Buses – need space on the roads to be quicker than the car. Bus lanes must be allowed for on the main through roads. Buses have to be available at hubs / train stations, be regular and affordable. We are concerned that existing roads such as Scrubs Lane and Old Oak Common Lane, do not have enough road space to handle the numbers expected. if OPDC takes off and 24K new homes and 10K new employees in Park Royal
99	1865	Residents Association	John Haston	West Twyford Residents Association	Transport	T7		Freight – londmay have to look at a New York freight lorry system. Not allowing large lorries into the city after 6:00am.
99	1866	Residents Association	John Haston	West Twyford Residents Association	Transport	T8		Construction – City centre construction projects need holding areas.
100	1982	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Transport			The Regulation 18 Plan acknowledged that that the starting point for OPDC transport policies was a congested strategic and local road network, limited access to public transport services and poor pedestrian and cycle environments (page 252). The Regulation 19 version gives no similar recognition to the fact that 24,500 homes and 55,000 jobs are expected to be implanted in an area of London where the road and public transport networks are already under great pressure.
100	1983	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Transport			There are no policies in this section of the Regulation 19 Local Plan which give local people any hope of radical measures to improve this situation or to cope with the impact of major growth. Policies T1-T9 are unexceptional but do not add up to what local residents would see as a viable long-term transport outcome for the Old Oak area.
100	1984	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Transport	T5		Policy T5 on Rail offers no clarity on where stations are proposed, this being left to the Place chapters. As a result, it ignores the scope for improvements to the rail network outside the OPDC boundary. Reference should be added to the proposed Crossrail/Elizabeth Line station at Kensal Canalside, now back on the agenda and strongly supported by RBKC. An additional Overground Station at Westway Circus, as proposed in the St Quintin and Woodlands Neighbourhood Plan and in the RBKC Regulation 19 Draft Local Plan, is a further important potential improvement to the local rail network which the OPDC Local Plan should recognise in Policy T5.
104	2151	Community Group	Del Brenner	Regents Network	Transport	T3	7.7	With the significant support for cycling, a rethink about cycling in the OPDC area is needed to be taken seriously. There should be a completely revised Figure 7.7 and a coherent cycle network. With segregated cycle highways being constructed in the busy centre of the City, it is ridiculous that something nearly as useful cannot be supplied in West London!
104	2153	Community Group	Del Brenner	Regents Network	Transport	T3	T2	Any planning and policies for cycling should always be for 'Pedestrians and Cyclists' for safety and to establish a fair and balanced proposal. Reference (35 times) in the Local Plan to a nearly concealed study "Walking and Cycling Strategy (April 2017)" is encouraging. Unfortunately the Strategy does not resolve the problems mentioned above as it refers to 'quietways' without any explanation how such a badly designed proposal can ever work satisfactorily or at all.
106	2207	Local Resident	Catherine Sookha		Transport			There are also concerns about the possible 9 metre-wide TFL 'cycle bridge' across Old Oak Common Land, and even bigger concern about OPDC/TFL's ambitions to change this into a bridge for buses. This would have a massive impact on Kildun Court, Wells House Road and Midland Terrace residents in terms of visual impact, noise and air pollution, as well as negatively impacting on property prices. The original plan was for a tunnel and we require justification as to why this can't remain a tunnel. TFL made it clear that the cost of a bridge versus a tunnel is similar, but that this fulfils OPDC's ambition for a through-road to North Acton, albeit with a total disregard to the local community. Indeed, we question the High Street that, on the maps, comes out directly above Wells House Road and would feed traffic onto the already congested Old Oak Common lane.
106	2211	Local Resident	Catherine Sookha		Transport			There is also a concern about the unrealistic desire to make the area a car-free zone, thereby penalising elderly, disabled and people with large families who are reliant on cars.
107	2264	Residents Association	Mark Walker	TITRA	Transport			TITRA is very disappointed to see that this draft Local Plan offers no imaginative policies that will help mitigate strain on the local road network that will be caused by generating 24,500 homes and 55,000 jobs; this is regrettable since the previous draft plan (Regulation 18) acknowledged that it was inadequate and under pressure.
109	2296	Local Resident	Lynette Hollender		Transport			There are also concerns about the possible 9 metre-wide TFL 'cycle bridge' across Old Oak Common Land, and even bigger concern about OPDC/TFL's ambitions to change this into a bridge for buses. This would have a massive impact on Kildun Court, Wells House Road and Midland Terrace residents in terms of visual impact, noise and air pollution, as well as negatively impacting on property prices. The original plan was for a tunnel and we require justification as to why this can't remain a tunnel. TFL made it clear that the cost of a bridge versus a tunnel is similar, but that this fulfils OPDC's ambition for a through-road to North Acton, albeit with a total disregard to the local community. Indeed, we question the High Street that, on the maps, comes out directly above Wells House Road and would feed traffic onto the already congested Old Oak Common lane.

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109	2300	Local Resident	Lynette Hollender		Transport			There is also a concern about the unrealistic desire to make the area a car-free zone, thereby penalising elderly, disabled and people with large families who are reliant on cars.
110	2443	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T1		This policy is not effective. 'Healthy Streets' that are pleasant, walkable, public transport and cycling friendly are supported. However, principal routes appear to have multiple and potentially conflicting specifications/functions.
110	2444	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T1		Understanding the hierarchy and functions of the proposed network is hindered by the lack of a map beside this policy. The street map, as a component of the "Policies Map", is coarse grained and needs to be read with separate maps for walking, cycling, bus routes etc. Local roads with 20mph limits are not defined and vehicular servicing/access routes are unspecified, particularly to HS2 Station.
110	2445	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T1		Given the congested alternative peripheral routes, there should be more definite improved E-W routes to serve the development.
110	2446	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T1		The Old Oak High Street, a fundamental element of Old Oak, will now be disrupted by TfL's demands to retain the Crossrail/Elizabeth Line Depot as voiced at the OPDC Board meeting of 12 September 2017.
110	2447	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T1		Clauses c) and d) are virtually duplications.
110	2448	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T1		Still relevant from Regulation 18 response: Policy and a programme of transport schemes should prioritise the resolution of existing transport problems which includes the diversion by through arterial road traffic across Park Royal and along the roads around Old Oak. These roads serving the districts of Harlesden, Old Oak, Park Royal and East Acton are regularly congested and at times grid-locked. However, the solution does not necessarily lie with the building of yet more roads and junction improvements, but with the promotion of sustainable forms of transport. This should be made clear in policy.
110	2449	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T1		Still relevant from Regulation 18 response: Old Oak High Street should be accessible only to pedestrians and cyclists with certain essential sections being accessible to buses. Grand Union Street should not be a primary route. Through routes in Old Oak North and South should be minimised.
110	2450	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T1		Still relevant from Regulation 18 response: Provide the main eastern entrance to the Old Oak Common Crossrail HS2 station with a direct road connection to Scrubs Lane. This would direct traffic away from Oak Common Lane and East Acton with their limited traffic throughputs and residential/town centre functions. There is no need for, and should not be provided, any route from Crossrail HS2 Station direct to the Scrubs.
110	2451	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T1		Still relevant from Regulation 18 response: There is no need for, and should not be provided, any route from Crossrail HS2 Station direct to the Scrubs.
110	2452	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T2		This policy is not effective. There is a need to segregate pedestrian /walking areas and routes from any wheeled transport (including cycling). It is very difficult for older and disabled people and those walking with small children to navigate places where cyclists are not segregated from pedestrians. Pedestrians should be able to roam freely on a dense network that permeates throughout area and developments, preferably away from traffic.
110	2453	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T2		The London Plan concept of lifetime neighbourhoods should be applied to facilitate walkable areas and neighbourhoods, and the same principles applied to the business areas to enable and promote journeys/trips on foot to local services, homes or stations.
110	2454	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T2		Connectivity with neighbouring districts is particularly important.
110	2455	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T2		Ensure that Old Oak High Street is not a switchback of changing levels, challenging gradients and bridges. A recently apparent issue is TfL's demands to retain the Crossrail/Elizabeth Line Depot voiced at the OPDC Board meeting of 12 September 2017, presumably necessitating a long bridge across the depot for the medium term. Programming of Old Oak South will need to be revised accordingly.
110	2456	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T2		Still relevant from Regulation 18 response: A transformational change to the transport and environmental context is required to Park Royal, Old Oak and neighbouring districts if walking is to represent a significant part of the journeys/trips in these areas. Those attributes and features of the walkable provision that is set out in the text are fundamental to this change. Relying upon development proposals as set out in policy will not secure this transformation, particularly in those parts not subject to development proposals. A positively planned proactive programme of proposals should be prepared to support this policy. This should be signposted in policy.
110	2457	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T2		Still relevant from Regulation 18 response: Footpaths should be wide enough, and kept clear of obstructions – parked vehicles etc. -. Park Royal with its narrow streets is difficult to walk.
110	2458	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T2		Still relevant from Regulation 18 response: Encourage the creation of greened/treed routes and a green walking surface as well as hard surfaces.
110	2459	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T2		Still relevant from Regulation 18 response: Ensure that the lighting of walking routes is fit for purpose. It is suggested that walking routes should be well-lit, but not over-lit, to keep within 'dark skies' design guidelines. Exceptions at perceived danger spots can be made.
110	2460	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T2		Still relevant from Regulation 18 response: There is a need for continuing dialogue to share and consider the diverse suggestions for specific projects.
110	2461	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T3		This policy is not effective. It lacks clarity on cycling around OPDC street network and integration with cycling proposals by Transport for London and the boroughs. Whilst there is support for the principle expressed in clause b) (subject to the request for pedestrian/cyclist segregation noted below), this needs fuller expression and added definition in the map and an accompanying statement on provision and programming. A similar promised transformational change at the Olympic Park area has not materialised. As presently framed, the policy will not radically change the low take up of cycling, some 3% of trips, in Park Royal.

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110	2462	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T3		A greater density of routes and links is necessary to achieve critical mass take off in cycling, widespread connectivity well integrated into surrounding areas and networks. More should be proposed on the provision of alternatives to congested peripheral roads and existing roads into/out of the OPDC area.
110	2463	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T3		Routes should be wide enough for a variety of cycling (e.g. commuting, recreational...) allowing passing one another, at the outset and not retrofitted.
110	2464	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T3		Still relevant from Regulation 18 response: As stated in the response to Policy T2 Walking, relying upon development proposals as set out in policy will not secure a transformative take-off in cycling, particularly in those parts not subject to development proposals. A positively planned proactive programme of proposals should be prepared to support this policy. This should be signposted in policy.
110	2465	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T3		Still relevant from Regulation 18 response: Again, forming new and improved links with neighbouring districts is particularly important if the physical and behavioural barriers are to be surmounted. The accompanying map to policy depicts limited cycle network connectivity beyond the boundary of the MDC and relatively few links across the boundary.
110	2466	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T3		Still relevant from Regulation 18 response: Policy (b) should require the segregation of cyclists and pedestrians – as comments to Policy T2 Walking.
110	2467	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T3		Still relevant from Regulation 18 response: Need for continuing dialogue to share and consider the diverse suggestions for specific projects to take these forward. .For example, local knowledge suggests that there is a redundant freight railway tunnel under the A40, just west of the parallel Central Line (Ealing Broadway branch) tunnel that could be made into a cycling route. Another suggestion is to turn the unused railway alignment beside the Central Line (West Ruislip branch) into a cycling route. These and other alternative options should be further explored by the OPDC actively engaging and involving the community in the design of the cycling routes
110	2468	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T4		This policy is not effective. Car dependency and congestion in Park Royal cannot be tackled only through controlled parking. Park Royal is characterised by on-street and, in places, on-pavement parking and servicing. Vehicles obstruct pavement and highway. For example, to walk parts of Coronation Road is highly problematical.
110	2469	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T4		There is no certainty of implementation given that OPDC is not the highway authority.
110	2470	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T4		Any parking and loading/unloading provision should be on-site and streets should allow the free flow of buses throughout the OPDC area.
110	2471	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T4		Still relevant from Regulation 18 response: Provision of only 0.2 spaces per new home is very challenging, and may affect successful marketing of housing developments. The OPDC should publish evidence on existing similarly scaled schemes that successfully function with such very low parking standards.
110	2472	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T4		Still relevant from Regulation 18 response: Controlled parking zones within Park Royal should target all-day parking, not the daytime visits that underpin the economic activities of the area. These zones should be coordinated within a management programme to resolve prevailing traffic, servicing and environmental issues.
110	2473	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T5		This policy is not effective. Focusing Old Oak development on the HS2 Station as a destination is not good place-making; it is simply one component of the area. In particular policy clauses e) & h) have consequences for and pre-empt proper place-making and lack clarity on the implications for the design solutions for stations. Old Oak Common Station and its context should not be predetermined by clause h).
110	2474	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T5		Need to relate stations to their rail services and be more specific on how interchange between stations/services is achieved. Connections between stations that are safe, efficient and sheltered are crucial. That Old Oak Common Station has entrances/exits as close as possible to the Overground Stations is essential to easing the interchange and maximising connectivity. Specifically reference the 2 new Overground stations and upgraded North Acton station in Policy to ensure delivery. Hythe Road Station is essential to Old Oak (Car Giant)/Scrubs Lane developments.
110	2475	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T5		Protect the potential for Willesden Junction to have a greater local/west London role with more platforms.
110	2476	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T5		This policy, and indeed the Old Oak South proposals, lack flexibility, given that the strategic transport hub, which as explained in Policy SP1 forms the 'catalyst for growth', is dependent on a project largely beyond the ability of the OPDC to control.
110	2477	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T5		Programming of Old Oak South will need to be revised following the discussion at the OPDC Board meeting of 12 September 2017 on TfL's demands to retain the Crossrail/Elizabeth Line Depot. This will prevent over-track development in the medium term. Generally, there is a lack of certainty of delivery of all the proposed transport and infrastructure elements. The need to protect railway operational land and secure alternative facilities if displaced should be addressed.
110	2478	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T5		Still relevant from Regulation 18 response: This is a new district for London that for railway operational reasons will have a large interchange station on one edge of it. To achieve successful place-making, the HS2 and Crossrail station should not be considered as being the heart, or at the heart of the Old Oak development. The station is 'useful' in the sense that it underpins successful investment in development of the area, so long as that development is appropriate in terms of scale, form and function. But it should be recognised for what it is, an interchange, and, therefore, its primary function and facilities should be to provide for convenient train to train changes by travellers, and to cater for commuters, residents and visitors to Old Oak.
110	2479	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T5		Still relevant from Regulation 18 response: Vehicular access to the station is heavily constrained by the congested roads of West London and local roads will be hard pressed to cope with any further development at Old Oak and Park Royal.
110	2480	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T5		Still relevant from Regulation 18 response: The substantial capacity improvements to stations are part of the policy, but are dependent on development proposals coming forward and facilitating them, among other things. Development in North Acton is well on the way to adding

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								10.000 people locally, creating over capacity problems at the station. The station needs to be changed now, not at some un-programmed time in the future.
110	2481	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T5		Still relevant from Regulation 18 response: The connections between and to/from stations are crucial to their satisfactory, safe, and efficient working. Provide clear, accessible information and signage at stations, subways and connections including where assistance is available to elderly and disabled users.
110	2482	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T5		Still relevant from Regulation 18 response: The relationship of railways with new or more frequent services with neighbouring properties should be carefully considered and any unavoidable adverse environmental impact should be remedied. Proximity, noise, lights, activity and overlooking can significantly diminish amenity. Policy should provide for the safeguarding of amenity, particularly as detailed station and rail link studies are not available to support most of the proposals set out in Policy.
110	2483	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T5		Still relevant from Regulation 18 response: There is need for continuing dialogue to share and consider the diverse suggestions for specific projects to take these forward.
110	2484	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T6		This policy is not effective. It is inadequate to proactively support bus development in a planned and coherent way, on a road network that should facilitate optimum routing, particularly between Park Royal and Old Oak/HS2 Station. This should be made explicit in policy. It is dependent on individual developments coming forward, and this is reflected in the likely indeterminate consequences arising from clause c).
110	2485	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T6		It is essential that policy should commit to bus routes that serve and bus stops that are located at stations and other key points to maximise connectivity, as well as integrating with surrounding area. Need also to consider terminating and interchange facilities.
110	2486	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T6		Still relevant from Regulation 18 response: The provision of effective, accessible, convenient, regular bus services is of great significance to the efficient functioning of the area, now and in the future. To achieve this requires studying not just Park Royal and Old Oak, but also the areas beyond, in cooperation with the boroughs, to tackle the obstacles to bus operations. This may require a greater degree of bus prioritisation in the wider area.
110	2487	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T6		The provision of frequency increases, new and extended bus routes and bus stop locations warrants Involvement of the community in their planning. ...the possible bus route map... has not been widely known and studied. Some preliminary comments include, but not exclusively, the linking of neighbourhoods, the provision of links to social infrastructure, shops, medical establishments, stations etc., routes crossing the area, and perhaps within the area, circular routes. The policy should signpost that there will be collaboration with communities on the implementation of this policy. There is a need for continuing dialogue to share and consider the diverse suggestions for specific projects to take these forward.
110	2488	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T7		This policy is not effective. The policy should be more emphatic on planning for and the provision of consolidation centres to transfer loads to smaller 'last mile' vehicles with controls on access by HGVs; together with a proactive plan to improve Park Royal's transport and traffic operations.
110	2489	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T7		Loading/unloading provision should be on-site and streets should allow the free flow of buses throughout the OPDC area. Reinstate FORS to gold standard.
110	2490	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T7		Policy T7 d): substitute 'canal' for "water".
110	2491	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T7		Still relevant from Regulation 18 response: To avoid pre-empting the selection of consolidation centre(s) and lorry holding areas sites, there should be transparent objective site selection criteria to ensure the proper planning. This is because such facilities will have significant transport and environmental impacts, potentially beyond Old Oak and Park Royal. These, to include, but not exclusively, such considerations as: the reducing already high levels of air pollution and congestion on existing roads; minimising levels of noise, dust and vibration from delivery and servicing; proximity and ease of access from A40 and A406 and/or rail and/or canal facilities.
110	2492	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T7		National planning policy requires policies and measures that maximise sustainable transport solutions (NPPF29). The promotion of rail and canal for freight should be an integral part of this policy and rail links/heads and wharfs should be protected and enhanced. See also response to Policy on Construction below.
110	2493	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T7		The Plan should positively plan for Park Royal to resolve, among other things, the transport issues, many of which are related to servicing and deliveries, but will not be dealt with through development proposals. A clear signpost in this policy, connected with Place Policies on Park Royal, should bring forward a management programme to resolve prevailing traffic, servicing and environmental issues.
110	2494	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T8		This policy is not effective. There needs to be an OPDC overall strategy within which sits this policy which should be more explicit that consolidation centres are essential and that there is a need to regulate emissions as well as traffic.
110	2495	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T8		Promotion of use of rail and canal supported.
110	2496	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T8		Construction Logistics Plan/Code of Practice need to be monitored and periodically revisited (to ensure that they are fit for purpose over time). Reinstate FORS to gold standard.
110	2497	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T8		The text should cite TfL's strategic and detailed approach to Vauxhall Nine Elms Battersea Opportunity area as a model.
110	2498	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T8		Still relevant from Regulation 18 response: See responses above on Policy for Freight etc. on selection of consolidation centres and lorry holding areas and on sustainable transport solutions.
110	2499	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T8		Still relevant from Regulation 18 response: There should be a statement committing the OPDC to make: positive relationships with canal freight companies and relevant public bodies in order to maximise possible use of the canal and minimise transportation of construction

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								materials by road; and a plan of action for maximum canal use during all construction phases involving engagements with Cross Rail, HS2 and all major planning applications.
110	2500	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T8		Still relevant from Regulation 18 response: Process: There should be meaningful and effective community involvement in the preparation of an OPDC/TfL's Construction Logistics Strategy and development CLP/CofPs. Appropriate method of construction, including related transport, agreements should be part of the planning approval process.
110	2501	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T8		Still relevant from Regulation 18 response: The Strategy, Plan and Code should include: the management of construction phasing so that particular areas are not building sites over prolonged periods of time and/or intensity;
110	2502	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T8		Still relevant from Regulation 18 response: developments should follow Considerate Contractor Schemes; these should include good communication with the community to help minimise inconvenience;
110	2503	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T8		Still relevant from Regulation 18 response: prefabricated building components should be promoted
110	2504	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T8		Still relevant from Regulation 18 response: A development's Construction Logistics Plan and Construction Code may be required to provide mitigation and prevention measures that extend beyond the actual construction site.
110	2505	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T9		This policy is not effective. Implementation needs to be monitored and periodically revisited, and this policy should apply to construction sites, as they will be key features for some time, for this policy to be effective.
110	2506	Community Group	Sharon Hayward	Grand Union Alliance	Transport	T9		The text should cite TfL's strategic and detailed approach to Vauxhall Nine Elms Battersea Opportunity Area as a model.
111	2672	Local Resident	Jeremy Aspinall		Transport			There are also concerns about the possible 9 metre-wide TFL 'cycle bridge' across Old Oak Common Land, and even bigger concern about OPDC/TFL's ambitions to change this into a bridge for buses. This would have a massive impact on Kildun Court, Wells House Road and Midland Terrace residents in terms of visual impact, noise and air pollution, as well as negatively impacting on property prices. The original plan was for a tunnel and we require justification as to why this can't remain a tunnel. TFL made it clear that the cost of a bridge versus a tunnel is similar, but that this fulfils OPDC's ambition for a through-road to North Acton, albeit with a total disregard to the local community. Indeed, we question the High Street that, on the maps, comes out directly above Wells House Road and would feed traffic onto the already congested Old Oak Common lane.
111	2676	Local Resident	Jeremy Aspinall		Transport			There is also a concern about the unrealistic desire to make the area a car-free zone, thereby penalising elderly, disabled and people with large families who are reliant on cars.
113	2702	Local Resident	Thomas Dyton		Transport			There are also concerns about the possible 9 metre-wide TFL 'cycle bridge' across Old Oak Common Land, and even bigger concern about OPDC/TFL's ambitions to change this into a bridge for buses. This would have a massive impact on Kildun Court, Wells House Road and Midland Terrace residents in terms of visual impact, noise and air pollution, as well as negatively impacting on property prices. The original plan was for a tunnel and we require justification as to why this can't remain a tunnel. TFL made it clear that the cost of a bridge versus a tunnel is similar, but that this fulfils OPDC's ambition for a through-road to North Acton, albeit with a total disregard to the local community. Indeed, we question the High Street that, on the maps, comes out directly above Wells House Road and would feed traffic onto the already congested Old Oak Common lane.
113	2706	Local Resident	Thomas Dyton		Transport			There is also a concern about the unrealistic desire to make the area a car-free zone, thereby penalising elderly, disabled and people with large families who are reliant on cars.
114	2758	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Transport			We are very disappointed to see that this draft Local Plan offers no imaginative policies that will help mitigate strain on the local road network that will be caused by generating 24,500 homes and 55,000 jobs. This is regrettable, since the previous draft plan (Regulation 18) acknowledged that it was inadequate and under pressure.
116	2804	Community Group	Mark Balaam	West London Line Group	Transport	T5		We generally support the comments here.
116	2805	Community Group	Mark Balaam	West London Line Group	Transport	T5	Paras 7.37-7.42	We find it very poor that the Plan omits any mention of the GTR/Southern East Croydon – Milton Keynes service, despite the fact that it crosses the entire OPDC area, yet without stopping. It will continue to do so unless our proposed raft is built, or possibly if its trains were to call at the low level platforms at Willesden Junction if these were re-instated. The route serves 17 stations, many of them major centres and the trains have been recently strengthened to 8-cars. The normal off-peak frequency should be doubled to half-hourly between East Croydon and (ideally) Wembley Central, although Shepherd's Bush would be an acceptable northern terminal for these extra trains. However, we would ask that the Plan seeks this half hourly service as far north as Birmingham when new HS2 traffic releases WCML paths. We trust that our proposals for the link and raft at OOC and Westway Circus can be mentioned here, together with the 15 sets of services that could run, if these proposals were implemented.

Housing

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
6	8	Local Resident	Robert Covell		Housing	H2		1. You mention new housing for London. Not once do you refer to social housing, which immediately flags warning signs of private development and profiteering. There are already local communities in the area who do not need to be gentrified.
14	62	Agent	Leonie Oliva	Deloitte LLP (on behalf of Imperial College)	Housing	H10		Imperial is supportive of the significance given to student accommodation throughout the draft Local Plan. Policy H10, 'Student Accommodation', importantly recognises the continued growth in demand for student accommodation. Of importance is that this land use and its users are emphasised as ones that can enhance an area's reputation as a dynamic and vibrant location, as well as again contributing to place making, regeneration and investment. Imperial is content with the mention that this is given in the draft Local Plan, and is also supportive of the need for student accommodation to, where possible, be located close to transport nodes; much like that near North Acton Station. It should be noted that the development of student accommodation can relieve the pressure on demand for private sector housing in the surrounding areas.
23	180	Local Authority	Cllr. Muhammed Butt	London Borough of Brent	Housing	H2		Brent Council believes this aspect of the Plan is unsound on the grounds it is not consistent with national policy, positively prepared or effective. In addition, it is not consistent with the London Plan. Policy H2 sets a target of 50% affordable housing for major developments. It is proposed this comprises 30% London Affordable Rent and 70% intermediate, such as London Living Rent and London Shared Ownership. The National Planning Policy Framework (NPPF) requires Local Plans to meet the objectively assessed need for market and affordable housing. Local Plans are to provide for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. London Plan policy 3.11 sets the approach reflective of London's needs, of 60% of affordable housing provision to be for social and affordable rent and 40% for intermediate rent or sale. The Mayor of London's Affordable Housing and Viability SPG (2017) states the split for affordable housing should be 30% low cost rent (social rent or affordable rent), 30% intermediate products and 40% to be determined locally. The SPG does not set out an approach to determining the 40%, but in light of the NPPF it is considered a key factor should be objectively assessed need in the housing market area. Old Oak and Park Royal fall within the West London Broad Rental Market Area, which contains parts of Ealing, Hammersmith & Fulham, Hounslow and Brent. As both the OPDC and Brent Strategic Housing Market Assessment (SHMA) illustrate the predominant affordable housing need is for low cost rent. The average house price within Brent, Ealing and Hammersmith & Fulham in 2014-15 was £332,600. This is a ratio of house price to earnings of 15.8. The table below is taken from the OPDC SHMA. It illustrates that the vast majority of households in need of affordable housing within the Housing Market Area will not be able to afford to meet the costs of London Living Rents. The OPDC Housing Evidence Statement identifies an 86% need for London Affordable Rent housing. ...the affordable housing which has been granted planning consent to date at Old Oak, stretches the realms of what would be considered genuinely affordable when considered against Brent's average household income of £24,927. Brent recognises the role that intermediate products can have in creating balanced communities. They do address a small percentage of those households identified to be in affordable need. The products also provide a valuable opportunity for those classified as not being in affordable housing need, but unable to afford to purchase a home (typically private market renters). Brent also understands the need for flexibility within the policy for it to endure potentially over the Plan period and take account of viability considerations and changes in need over time. Nevertheless, Brent is concerned that the policy as currently worded does not place sufficient weight or clarity on how evidenced affordable needs will be prioritised compared to products classified as affordable housing, but which do not necessarily meet affordable needs. Taking account of what has been achieved to date by OPDC, Brent is concerned that the desire to show attainment of a higher affordable housing target will be at the expense of addressing the majority of those identified to be in affordable need. This is contrary to key principles in both the NPPF and London Plan to meet objectively assessed housing need, and create mixed and balanced communities. It also is not reflective of the evidence base related to affordable housing needs which supports the Local Plan. The reason given for departing so significantly from the evidence base, appears to be purely on the grounds of viability. It is acknowledged viability is a significant consideration, however, policy H2 sets a target of 50% affordable housing, meaning all individual planning applications will be subject to individual viability appraisal. In addition, paragraph 2.41 of the Mayor's Housing SPG allows for a degree of flexibility where it can be demonstrated a preferred tenure split cannot be achieved. Given these mechanism it is considered viability should not primarily dictate the policy approach. In line with the NPPF the starting point should be objectively assessed need as evidence by the OPDC SHMA. The Mayor of London's priority as set out in his manifesto and A City for Londoners is to create homes which are truly affordable. Brent strongly supports this objective, and as such feels the priority must be on securing housing which is genuinely affordable, rather than a higher proportion of housing which isn't affordable in the context of the housing market area. The majority of Old Oak is in public sector ownership, which gives flexibility in terms of viability. As such, Old Oak presents a unique opportunity for the Mayor to prioritise the delivery of truly affordable housing. Change Sought: H2c) to be deleted and replaced with "providing 60% of affordable housing as London Affordable Rent and 40% as a range of Intermediate housing, including London Living Rent and London Shared Ownership.
23	189	Local Authority	Cllr. Muhammed Butt	London Borough of Brent	Housing	H2		Furthermore, whilst the Local Plan protects shared accommodation such as HMOs it does not protect against the loss of existing specialist accommodation. This means that specialist accommodation secured under policy H9 could subsequently be converted to conventional residential, meaning the Objectively Assessed Need for specialist housing is unlikely to be met. Changes sought: Proposals for conversions or loss of existing specialist housing will be supported where they: f) no longer meet identified local need for specialist housing; g) do not comply with any relevant standards, including quality;

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								h) give rise to unacceptable impacts on amenity, or i) are not required through their reconfiguration or redevelopment for a recognised specialist housing need.'
24	199	Agent	Harriet Barber MRTPI	Montagu Evans (on behalf of T.A.S.B. Investments Limited)	Housing	H5		Policy H5 (Existing Housing) outlines the OPDC's approach to existing residential accommodation and states that the loss of existing residential accommodation will be resisted unless, inter alia, "its loss is critical to unlock the comprehensive regeneration of an area". Our Client is supportive of this approach.
27	230	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Housing	H2	8.18	The requirement to deliver infrastructure and presence of abnormal site constraints will be critical and have a direct impact on the ability for some development schemes to deliver affordable housing. These considerations will need to be taken into account in assessing development viability and should be specifically recognised in the main body of Policy H2.
27	231	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Housing	H4	a.i	Whilst this part of the Policy is qualified by 'where appropriate' it would be useful to acknowledge where residential sites are suited to providing commercial use and active frontages at street level, family accommodation will need to be on the upper floors.
29	321	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Housing	H10		Citrus welcome the support for student accommodation within Policy H10 along with the recognition within supporting text of the increasing numbers of students in London and resulting increased demand and need for accommodation.
30	330	Local Authority	Steve Barton	London Borough of Ealing	Housing	H2		Ealing supports the strongest possible emphasis on the delivery of affordable housing at Old Oak. The relevant policies, H2 and SP4 support a viability-led 50% target which broadly aligns with London's assessment of need and with that of surrounding boroughs. This question is also tied very closely with proposals for OPDC to function as the owner and developer of public land holdings within Old Oak, which potentially allow it a much wider range of tools to deliver new affordable housing. Delivery of the maximum practicable level of affordable housing is central to the case for OPDC to function as a landowner and development body.
30	331	Local Authority	Steve Barton	London Borough of Ealing	Housing	H2		Policy H2 sets a target of 50% affordable housing for major developments. It is proposed this comprises 30% London Affordable Rent and 70% intermediate, such as London Living Rent and London Shared Ownership. - The National Planning Policy Framework (NPPF) requires Local Plans to meet the objectively assessed need for market and affordable housing. Local Plans are to provide for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. - The Mayor of London's Affordable Housing and Viability SPG (2017) states the split for affordable housing should be 30% low cost rent (social rent or affordable rent), 30% intermediate products and 40% to be determined locally. The SPG does not set out an approach to determining the 40%, but in light of the NPPF it is considered a key factor should be objectively assessed need in the housing market area. - Old Oak and Park Royal fall within the West London Broad Rental Market Area, which contains parts of Ealing, Hammersmith & Fulham, Hounslow and Brent. OPDC SHMA illustrates that the vast majority of households in need of affordable housing within the Housing Market Area will not be able to afford to meet the costs of London Living Rents. The OPDC Housing Evidence Statement identifies an 86% need for London Affordable Rent housing. - Ealing's own SHMA similarly suggests 60% social/affordable rent and 40% intermediate - The reason given for departing so significantly from the evidence base, appears to be purely on the grounds of viability. It is acknowledged viability is a consideration, however, policy H2 sets a target of 50% affordable housing, meaning all individual planning applications will be subject to individual viability appraisal. In addition, paragraph 2.41 of the Mayor's Housing SPG allows for a degree of flexibility where it can be demonstrated a preferred tenure split cannot be achieved. Given these mechanism it is considered viability should not dictate the policy approach. In line with the NPPF the starting point should be evidence on objectively assessed need as evidence by the OPDC SHMA. - It may be that 50% affordable housing target cannot be achieved on all developments, but the priority should be on securing housing which is genuinely affordable in the context of local need.
30	376	Local Authority	Steve Barton	London Borough of Ealing	Housing	H2	c)	The plan should properly reflect OPDC and neighbouring boroughs assessments of need as follows; 'c) providing 60% of affordable housing as London Affordable Rent and 40% as a range of Intermediate housing, including London Living Rent and London Shared Ownership (except for Build to Rent, see Policy H6) and including units that are affordable to households on average incomes in the host local authorities;'
30	377	Local Authority	Steve Barton	London Borough of Ealing	Housing	H3	d)	The policy should clarify what is meant by 'appropriate and flexible design for changing needs over time'. As this requirement is in policy it could potentially range much wider than the accessibility and adaptability standards referenced in para 8.37. Any relevant guidance should be directly referenced in the supporting wording.
30	378	Local Authority	Steve Barton	London Borough of Ealing	Housing	H5	c.i	This policy is currently mis-phrased to mean that only the conversion as a whole would require access to private or communal open space. Suggest 'at least one family sized unit (3+ bed) with access to private or communal open space is provided through each conversion.' It should also be clarified in the supporting wording that this does not alter the London Plan requirement for 'private amenity space'.
30	379	Local Authority	Steve Barton	London Borough of Ealing	Housing	H9		This policy is currently very open-ended. Suggest that it should support specialist housing that meets defined need.
30	380	Local Authority	Steve Barton	London Borough of Ealing	Housing	H9		This policy should also reflect the need to ensure an appropriate mix of specialist housing with other types of unit. This is important not only to the delivery of lifetime neighbourhoods but also to the social mix of Old Oak.
31	389	Community Group	Megan Lewis	Crisis Brent	Housing	H2		We welcome the fact that the OPDC Local Plan acknowledges that lack of new housing supply at genuinely affordable levels is a driver of increased levels of homelessness (paragraph 8.1). It is disappointing however that this does not translate into policy commitments that will have a meaningful impact on tackling the scale homelessness and housing need caused by housing unaffordability in communities such as

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								Harlesden. We would like to see the Local Plan go much further in using available powers and resources to maximise the supply of new homes that local people can afford, including the growing numbers of homeless families and other types of homeless household including single homeless people.
31	390	Community Group	Megan Lewis	Crisis Brent	Housing	H2		It is disappointing that the Affordable Housing Policy target at H2 c) stipulates a requirement that only 30% of the 50% affordable housing requirement should be at London Affordable Rent (equivalent to 15% of all provision). London Affordable Rent is the rent level that comes closest to providing a genuinely affordable rent level for low earning households and the OPDC's SGMA established an 86% need for LAR within the affordable housing requirement (paragraph 8.20). The Plan suggests that as LAR provision has the greatest impact on viability – implying that this is reflected in the decision to establish a lower proportion target for LAR than for intermediate housing – but as OPDC intends to apply the threshold approach to viability and review established by the Mayor's guidance it would in our view be more appropriate to establish a higher target, more reflective of levels of actual housing need, and allow the viability assessment process to address any site related challenge that arises with regard to the viability of affordable housing delivery. The decision to set a target for LAR at such a low level suggests a lack ambition to address the housing needs of low paid workers in Harlesden and other local communities.
31	391	Community Group	Megan Lewis	Crisis Brent	Housing	H6		Policy H6 requires that Build to Rent schemes provide affordable housing at London Living Rent Levels which may be out of reach of lower earners. There is no stipulation that London Living Rent falls within Local Housing Allowance rates, which places the product out of reach of households who require housing benefit to help cover the cost of their rent. It also puts at risk the tenants of build to rent schemes who experience a change in circumstances and become unable to meet the full cost of their rent without help from housing benefit. We think this is a wasted opportunity to expand the role of Build to Rent to provide a proportion of homes for lower paid households, which would also open up the sector to households who have experienced homelessness;
31	392	Community Group	Megan Lewis	Crisis Brent	Housing	H6		We also encourage OPDC to consider how it can use its influence to encourage innovation in the use of Build to Rent housing as follows: • A key characteristic of Build to Rent housing is its unified management structure, often with an on-site management presence, and the provision of longer term tenancies. Where local planning authorities have required the provision of discounted or affordable units within build to rent schemes, affordable tenancies are typically pepper potted through the development and receive the same level of amenity and service as market rent tenancies; • This creates potential to deliver mixed income communities in Build to Rent developments as long as viability considerations can be addressed. Analysis by Future of London/LSE London noted the viability challenge for Build to Rent developers which arises because the yield-based gross development value of rental schemes is typically lower than the value generated by for sale schemes.
31	393	Community Group	Megan Lewis	Crisis Brent	Housing	H6		OPDC could include a statement in the Local Plan, signalling its intention to encourage delivery of a proportion of Build to Rent housing for those on the lowest incomes. The Future of London/LSE report recommended consideration of a “more-socially minded version of Build to Rent” and we would like to see this developed to include provision for those on the lowest incomes. This might involve council, housing association or other not-for-profit entities leading a development to provide good quality but affordable rental housing with a range of community amenities. It should include exploring the feasibility of delivering institutionally funded rental provision for a mix of income groups including a proportion of homes for those in low paid work at rent levels within LHA rates as well as for the intermediate housing market.
31	394	Community Group	Megan Lewis	Crisis Brent	Housing	H7		Single homeless people often have no choice but to live in shared housing, particularly those aged less than 35 years who require housing benefit to help cover the cost of their rent, as in most cases benefit will only cover the cost of a shared rent. It is disappointing that policy H7 allows providers of purpose built shared housing to offer commuted sums in lieu of affordable housing rather than making on-site provision. Some housing providers are developing interesting models of provision to make shared tenancies work – whether in smaller family sized homes or in larger purpose built schemes. ² We urge OPDC to look again at how it can encourage innovation in this area, drawing on the learning from existing cutting edge provision, to incorporate provision for single adult households on lower incomes.
35	449	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Queens Park Rangers Football Club and Stadium Capital Developments)	Housing	H1		We encourage the OPDC to work with partners to identify opportunities to bring forward the early delivery of new housing. The delivery of Oaklands is a good example and QPR and SCD welcome the opportunity to work with the OPDC to bring forward their other land holdings in a similar manner.
36	452	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Housing	H1		Draft policy H1 sets a target of delivering 1110 new homes per year, with a total of 22,350 over the plan period. This is below the minimum guideline set in London Plan Annex 1 for the two Opportunity Areas of Old Oak Common and Park Royal. The Local Plan acknowledges the delivery issues of the major rail infrastructure and associated phasing of land availability and includes provision that over a slightly longer timeframe, the capacity set in the London Plan will be exceeded
36	453	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Housing	H1		The OPDC has been inputting into the London SHLAA and will have a formal housing target published in the new draft London Plan, based on this process. TfL has requested that references to the Elizabeth line depot site coming forward for development during the Local Plan period be removed as any redevelopment proposals will only come forward in the longer term and will still be required to provide for operational purposes. The removal of this site will not affect the OPDC's ability to deliver its housing numbers within the short term (0-10 years) as this site has been identified in the London SHLAA as delivering homes in 10-20 years and is proposed for mainly commercial rather than residential development.
36	454	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Housing	H2		The inclusion of a strategic 50% affordable housing target in draft Policy H2 is welcome, however the proposed Plan should specifically include the 35% (without public subsidy) threshold as well as the 50% threshold for public land, as set out in the Mayor's Housing SPG.
36	455	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Housing	H2	8.16	The reference to starting negotiations with a 50% affordable housing target (para 8.16) does not fully accord with approach set out in Mayor's Housing SPG. Especially as, later in the supporting text, the 50% requirement is open to negotiation and does not provide the certainty or

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								clarity needed to influence land values. The presence of abnormal site constraints would be expected to impact land values and the cost should not necessarily be born through a reduction in planning obligations.
37	491	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	Housing			The housing policies in the plan offer a positive aspiration for the delivery of 22,350 new homes over the plan's 20-year period. ACE supports this aspiration and believes there may be potential for OPDC to build further on these numbers to deliver more housing that London desperately needs. We support OPDC to deliver a mix of housing, such as affordable and family homes, and support OPDC's commitment to investigate further if these targets are achievable when full infrastructure requirements and the financial viability of developments are known.
37	501	Interest Group	James Robertson	Association for Consultancy and Engineering (ACE)	Housing	All		The ten housing policies support OPDC's aspiration for the delivery of a minimum of 22,350 new homes over the plan's 20-year period, and ensure the housing supply caters to a wide mix of needs. As the area will be one of the most connected areas in the UK, we believe there is potential for more than 1000 houses to be developed each year in the area to deliver a greater proportion of the 99,000 homes required in the three local boroughs. We support OPDC's efforts in ensuring the housing supply will be mixed. The 50% affordable housing target, if viable for residential developments, will provide opportunities for some Londoners struggling to get in the housing market. OPDC will need to monitor if this target is achievable when full infrastructure requirements and the financial viability of individual developments are known. We support OPDC's efforts in ensuring existing housing is not lost unless it is located within a Strategic Industrial Location, would result in new housing at an equivalent or higher density or it critical to unlock regeneration of the area. This policy will ensure that any changes to the existing housing stock will only occur if it adds a benefit to the overall community.
39	516	Planning Consultant	Patrick Grincell	HGH Planning (on behalf of Genesis)	Housing	H1		Genesis encourages the OPDC to work with partners to identify opportunities to bring forward the early delivery of new housing. The delivery of 605 new residential units and 40% affordable housing at Oaklands South is a good example of how this can be achieved.
42	535	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Housing	H2		Whilst we lend our support to the Plan as a whole and to the support it provides for bringing forward development at OOP, we wish to comment on some fundamental matters that are critical to the OOP site coming forward for development, and which have consequently been the focus of our review of the Draft Plan. In summary: We are concerned that the Local Plan avoids fully tackling the fundamental issue of viability and sets an unachievable target for affordable housing (50%) which does not reflect the considerable challenges and costs involved in delivering development at OOP. Whilst the Local Plan states that affordable housing is subject to viability, the headline target is based on an evidence base which does not seem to take account of the significant cost of infrastructure;
42	581	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Housing	H2		As commented above in relation to Policy SP4, we consider that the target for 50% of all housing to be affordable is very ambitious. Whilst Policy H4 does state that this is subject to viability, including the Mayor's threshold approach to viability, we consider that it would be much clearer if Policy H2 recognised the London Plan requirement (at Policy 3.12) for individual development schemes to provide the maximum reasonable amount of affordable housing, and if it expressed the Homes for Londoners' approach to developments on public and private land as separate targets, so as to avoid unrealistic expectations being placed on developments on private land. This approach would be warranted in the OPDC area given the unique nature of its land ownership and the significant and unusual costs of infrastructure which are to be borne by private developers (and which are recognised but not accounted for in the AHVA as acknowledged in the supporting text below). It is also important that any viability assessment for a scheme such as OOP reflects the long delivery programme and wide range of land uses proposed – each of which has different funding and income profiles. This includes commercial offices, retail, leisure, hotel and community uses, as well as different residential products including co-living, specialist care housing and build to rent. The Plan's requirements for minimum amounts of certain types of specialist housing products, as well as subsidised commercial and retail floorspace and community uses, will all need to be reflected in an assessment of the scheme's potential affordable housing contribution.
42	582	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Housing	H2	8.18	8.18 states that "The 50% affordable housing target and threshold approach has been tested as being achievable in certain circumstances and some specific sites through OPDC's Affordable Housing Viability Assessment (AHVA). However, this work does not take full account of the specific costs of unlocking development sites across the area. The full infrastructure costs are not known at this stage and these costs will need to be identified and considered as part of planning applications. The presence of abnormal site constraints is expected to impact land value and the cost should not necessarily be born through a reduction in planning obligations. However, it is recognised that specific site constraints, infrastructure requirements and financial viability may affect the amount of affordable housing that can be achieved on individual sites." We have commented separately on the AHVA, however given the fundamental role of the necessary and unavoidable infrastructure costs involved in delivering new housing at the OOP site, and in a situation where the existing land owner is bringing forward new housing on industrial land which carries a high cost for the relocation of the existing business, there is a fundamental difficulty in supporting the levels of affordable housing being targeted by the Local Plan. We do not consider that relegating such a critical issue to the supporting text, when the policy identifies a 50% target (which the AHVA concludes as not viable even without the infrastructure costs taken into account), is a realistic or helpful approach to stimulating the delivery of new homes in the OPDC area. And whilst we recognise that OOP is one site which will be assessed when a planning application is submitted, OOP is allocated to deliver approximately 25% of the OPDC area's total housing supply for the Plan period, and as such will have a significant impact on the overall provision of affordable housing. Include reference to the AHVA within the main text of the policy as well as the supporting text.
42	583	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Housing	H3	b)	We consider that the target to provide 25% of new homes as family housing, or more where appropriate (part b of the policy), is the wrong approach for what is an entirely new quarter for London. The OPDC area provides an important new opportunity to create a new high-density, highly accessible part of Central London in West London to deliver a large number of new homes to make a significant contribution to London's housing crisis. We consider that basing the target mix on an SHMA which assesses need in the established residential neighbourhoods in the surrounding area is flawed in the context of the new development. The OPDC housing supply should be considered in the context of meeting a London-wide demand, but with specific factors which include: - The long-term nature of regeneration activities at OOP means that for much of the time new residents will be moving into an area that is undergoing active change; - The need to establish momentum of delivery and a critical mass in the earlier stages of development, necessitating faster sales rates;

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								- The desire to maximise the number of new homes through higher density development which will make the best use of the significant new transport infrastructure being delivered. Remove or reduce the percentage requirement for 'family homes'.
42	584	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Housing	H3	8.34	Whilst 8.34 does recognise that the mix will not be applied 'rigidly', this works from an 'expectation' that developments will deliver 25% family units, despite noting that London-wide developments have delivered 20% family housing on average. We also note that the Housing Evidence Statement (at paragraph 8.5) states that the OPDC will be high density and so 'challenging and undesirable' too have a high family housing target, 'as many units would be unable to access appropriate amenity and play space'. For a scheme the size of OOP, this requirement represents approximately 1,625 family units. We do appreciate the recognition in Chapter 4 that family units are likely to be skewed towards the latter phases of the development, but we think the Local Plan needs to do more to set a realistic and appropriate target for family units that avoids unnecessary conflict at the planning application stage.
42	585	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Housing	H4	a), 8.39	It is also important to consider the overall proportion in relation to the design guidance at Policy H4. H4 a) and paragraph 8.39 state a preference for family housing to be located at ground or first floor level, or where higher to have direct level access to private and secure open space (i.e. more than just balconies). To have this for 25% of units in a high-density development is not possible and so the vast majority of family units are likely to be provided in accordance with part b) of this policy.
42	586	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Housing	H3	8.36, 8.37	8.36 requires all new housing units in OPDC to be designed 'with built-in flexibility to allow for units to expand or contract as household size, type and other circumstances change'. What does this mean? Once flatted developments are built, flexibility on units sizes is impossible unless units are amalgamated, on the top floor where they can be extended upwards or where they are rental products. We would suggest that flexibility is limited to internal changes, which is covered at 8.37.
42	587	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Housing	H9	b)	Policy H9 b) requires developments providing 1,000 or more homes to provide 10% of homes as specialist care and supported needs housing for older people and/or vulnerable people. On OOP, this represents a requirement for approximately 650 specialist housing units, which is a significant amount and will have a detrimental impact on project viability. Whilst a small element may be appropriate, we do not consider that such a large requirement will be the best way to fund and utilise the infrastructure which will be provided in the OPDC are for the maximisation of new homes and jobs. There is no flexibility in this policy to allow the policy to be applied flexibly and appropriately, and so we would encourage the introduction of some flexibility to allow for a considered balancing of priorities in the delivery of major sites such as OOP. Criteria i), iii) and iv) used to assess student housing in policy H10 would be appropriate.
45	657	Planning Consultant	James Armitage-Hobbs	DP9 (on behalf of Fruition Properties)	Housing	H3	a)	We support the general principles of the policy. However, the policy should take account of the fact that some sites are not appropriate for delivering 25% family housing and are better suited for smaller 1 and 2 bedroom units. These are usually constrained sites where the ability to deliver on-site amenity space is restricted.
47	708	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Housing	H1		The overarching thrust of draft Policy CH1 of the OPDC Local Plan is to support the delivery of a minimum of 22,350 new homes during the Plan period. This figure is based on OPDC's Development Capacity Study (DCS) and translates to an annual housing target of 1,100 dwellings. Consideration of housing need in the area is set out in detail in the Strategic Housing Market Assessment (SHMA), 2017. Detailed comments on the SHMA are provided below. The Council supports the level of housing proposed in Policy CH1 as it is positively prepared and justified based on proportionate evidence. The additional housing within the OPDC boundary will help meet the needs of the wider immediate area and across London.
47	711	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Housing	H2		The Council notes that Strategic Policy SP4 sets an overall target of 50% affordable housing and Policy H2 adopts the threshold approach to viability as set out in the Mayor of London's Affordable Housing and Viability SPG. The Council supports the measures proposed in Policy H2 to increase the provision of affordable housing to meet local and wider need.
47	712	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Housing	H8		Policy H8 supporting text states that there is no need arising in the OPDC area for Traveller pitches. The OPDC GTANA (2017), Policy H8 and supporting text does not acknowledge that LBHF and RBKC are jointly responsible for a Traveller site at Stable Way and that the two Councils have completed a Joint GTANA (Dec 2016). The study applies the PPTS definition of Travellers and concludes that the total accommodation needs across the two boroughs, LBHF and RBKC, is 9 pitches to 2030. This needs to be acknowledged and considered as part of the OPDC GTANA, Policy H8 and associated supporting text to reflect that there is need arising within LBHF, fulfil the Duty to Cooperate and satisfy the tests of soundness. The policy approach also does not reflect the work that LBHF is currently undertaking in respect of identifying sites to help meet need arising in the Joint GTANA. There are potential opportunities for additional pitch provision to be delivered as part of OPDC regeneration proposals, for land within the LBHF area, to assist LBHF to meet its joint Traveller needs.
56	922	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Housing	H1	f)	We should make the distinction that for affordable housing, the host borough should have 100% nomination rights to units within its boundaries and then potentially cascade to the other two boroughs in the OPDC
56	923	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Housing	H2	c)	LBHF does not consider this policy to be in conformity with national or London Plan policy. London Plan policy 3.11 sets the approach reflective of London's needs, 60% of affordable housing provision to be for social and affordable rent and 40% for intermediate rent or sale. The NPPF requires Local Plans to meet the objectively assessed need for market and affordable housing. Local Plans are to provide for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. Given the high affordable housing needs identified in the SHMA, which covers LBHF HMA, the Council does not consider this policy to be positively prepared or effective. LBHF acknowledges that viability is an important factor and part of the evidence in Local Plan preparation. However, the mayor's Affordable Housing and Viability SPG 2017 gives LPAs flexibility to decide the appropriate tenures for affordable housing. The Mayor's preferred tenure split is: • At least 30% low cost rent (social rent or affordable rent) with rent set at levels that the LPA considers 'genuinely affordable' (this will generally be significantly less than 80% market rent). • At least 30% as intermediate products, with London Living Rent and/ or shared ownership being the default tenures assumed in this category. • The remaining 40% to be determined by the relevant LPA which can be drawn from the tenures above or could include other products

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								where they are evidenced as genuinely affordable and are consistent with the London Plan's definition of affordable housing. We recommend that this flexibility is retained for two main reasons; 1. Shared Ownership is generally not appropriate for properties with market values in excess of £600k as is noted in the SPG. In H&F, this is likely to be the vast majority of homes larger than 1bed, and; 2. to strengthen the LPAs' negotiating position with developers. This is particularly important because the text here reads; "Delivering London Affordable Rent housing has the greatest impact on viability given the high cost of delivering housing at this level of discount on the market value. Delivering intermediate housing (including London Living Rent and London Shared Ownership) helps to improve the overall viability of delivering affordable housing." This implies that the compensation for providing London Affordable Rent is to provide Shared Ownership and London Living Rent products closer to the upper income threshold for affordable housing (currently £90k) which is contrary to this Council's Housing Strategy and would rule out almost everyone on this Council's intermediate housing register. H&F recommend retention of the flexibility outlined in the SPG to allow the Council to adopt the shared equity model as the alternative affordable housing product to shared ownership and London Living Rent while retaining flexibility to use any of the three products best meet the affordability of residents and workers in the borough. LBHF has adopted a 60% affordable rent/40% intermediate housing split, in line with the London Plan. The flexibility outlined above provides the OPDC greater opportunity to align with LBHF policy.
56	924	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Housing	H2	Para 8.23	H2c and paragraph 8.23 both refer to the use of average incomes in the host local authorities. LBHF use the median income as a benchmark and only apply this to intermediate homes only, as London affordable Rent should be affordable to people on low (i.e., below average) incomes. Our preference for intermediate homes is for them to satisfy the policy of meeting different income ranges in our housing strategy. LBHF's position is: The 40% for intermediate rental and sale homes, they should be affordable to residents earning under £60,000 and be guided by the income thresholds set in the Council's housing strategy. For intermediate dwellings to be considered affordable, annual housing costs, including mortgage (assuming reasonable interest rates and 10% deposit requirements), rent and service charges should be no greater than 40% of net household income, where 40% of net income is no greater than 70% of the gross income. LBHF welcome aligning with LBHF housing policy to ensure that development in the OPDC area can actually meet those in housing need in LBHF.
56	925	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Housing	H6	a)	Development in LBHF local authority land: LBHF should be able to influence the affordability of any intermediate housing product in order to meet our income thresholds. In addition we also query how this policy will provide affordable housing on build to rent, as it is not clear how they will meet the 35% threshold.
56	926	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Housing	H7		LBHF supports the role of HMO's and the role they play in contributing to the housing offer locally.
56	927	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Housing	H8		LBHF and RBKC prepared a joint Gypsy and Traveller Accommodation Needs Assessment in 2016. This showed there to be a joint need of 3 additional pitches in the first 5 years of the LBHF Local Plan (to be adopted early 2017). LBHF supports the policy which states that careful consideration to the future needs of gypsies and travellers and work with the boroughs. LBHF will continue to work with the OPDC on this through the Duty to Cooperate.
56	928	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Housing	H9		The proportion should be higher for social rented over other affordable housing tenures. Where wheelchair accessible housing is provided, there needs to be a consideration for parking spaces.
56	929	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Housing	H10		This policy should also make reference to high quality design and space standards to ensure that internal spaces are liveable.
68	1050	Community Group	Martin Cain	Friary Park Preservation Group	Housing	H1		There is no doubt about the urgent need for new homes but no information on funding.
68	1051	Community Group	Martin Cain	Friary Park Preservation Group	Housing	H2		There is no clear explanation of the tem "affordable homes" in cash term
68	1052	Community Group	Martin Cain	Friary Park Preservation Group	Housing	H4		There is no details about the provision of family housing
68	1053	Community Group	Martin Cain	Friary Park Preservation Group	Housing	H5		Policy is sound (no justification provided)
68	1054	Community Group	Martin Cain	Friary Park Preservation Group	Housing	H9		There are no details about the provision of specialist housing such as sheltered housing for the elderly.
70	1080	Local Resident	Joanna Betts		Housing	H1		We believe that there is no justification for the number of homes indicated in the Local Plan: 24,000 new homes. The OPDC has provide no modelling based on different projections of housing numbers.

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70	1081	Local Resident	Joanna Betts		Housing	H1		We would ask for justification of any projections based on the growing population in respect of Brexit and the Government's commitment to reducing immigration. Indeed, Jonathan Portes, professor of economics at King's College London and former director of the National Institute of Economic and Social Research (NIESR), feels the population may even fall. He says: "They [population projections] depend on all sorts of factors which the ONS does not pretend to be able to forecast or model. My view is that I think EU migration will fall very significantly over the next couple of years, and migration overall will fall. Therefore, the population increase may be significantly slower than the ONS says."
70	1095	Local Resident	Joanna Betts		Housing	H4		There are widespread concerns about lack of commitment to building affordable family homes, as OPDC seems committed to extending North Acton with plans for housing for transient renters and students. Justification is required as to how these transient populations will build a sustainable community. Monofunctional land uses are contrary to the overall spatial vision of the plan.
70	1096	Local Resident	Joanna Betts		Housing	H2		There are also concerns that that affordable housing isn't actually affordable to people who most need it. We need information as to the income level required to be able to afford these homes, and justification for that decision.
70	1097	Local Resident	Joanna Betts		Housing	H1		We ask why OPDC has lacked vision in exploring new concepts in housing such as re-zoning industrial areas to mixed use to enable local self-builds above existing businesses. (See GUA response.)
76	1165	Strategic Partner	Colin Lovell	Diocese of London	Housing	H2		Policy H1 and /or the explanatory text should refer to the need for specific key worker accommodation. In the case of church, community and youth workers if they are to be effective in their posts they need to live, often sacrificially, among the communities they serve. In most instances they would not qualify for affordable housing by being registered with a registered provider. Their employing bodies, often charities, are not always able to provide accommodation. The policy should include a reference to the OPDC working with service providers and developers/RSL's to address this matter
79	1208	Local Resident	David Craine		Housing	H2		Evidence suggests that provision of housing which is affordable for local residents is an important priority for the Develment Corporation and may need to be prioritised above other uses of the planning uplift driven by HS2/ Crossrail.
79	1209	Local Resident	David Craine		Housing	H3		The priority within the mix should be provision of affordable housing while the other priorities for planning uplift should respond to clear evidence for demand,
83	1262	Local Resident	Nadia Samara		Housing	H1		We believe that there is no justification for the number of homes indicated in the Local Plan: 24,000 new homes. The OPDC has provide no modelling based on different projections of housing numbers.
83	1263	Local Resident	Nadia Samara		Housing	H1		We would ask for justification of any projections based on the growing population in respect of Brexit and the Government's commitment to reducing immigration. Indeed, Jonathan Portes, professor of economics at King's College London and former director of the National Institute of Economic and Social Research (NIESR), feels the population may even fall. He says: "They [population projections] depend on all sorts of factors which the ONS does not pretend to be able to forecast or model. My view is that I think EU migration will fall very significantly over the next couple of years, and migration overall will fall. Therefore, the population increase may be significantly slower than the ONS says."
83	1277	Local Resident	Nadia Samara		Housing	H4		There are widespread concerns about lack of commitment to building affordable family homes, as OPDC seems committed to extending North Acton with plans for housing for transient renters and students. Justification is required as to how these transient populations will build a sustainable community. Monofunctional land uses are contrary to the overall spatial vision of the plan.
83	1278	Local Resident	Nadia Samara		Housing	H2		There are also concerns that that affordable housing isn't actually affordable to people who most need it. We need information as to the income level required to be able to afford these homes, and justification for that decision.
83	1279	Local Resident	Nadia Samara		Housing	H1		We ask why OPDC has lacked vision in exploring new concepts in housing such as re-zoning industrial areas to mixed use to enable local self-builds above existing businesses. (See GUA response.)
84	1289	Local Resident	Nicholas Kasic		Housing	H1		We believe that there is no justification for the number of homes indicated in the Local Plan: 24,000 new homes. The OPDC has provide no modelling based on different projections of housing numbers.
84	1290	Local Resident	Nicholas Kasic		Housing	H1		We would ask for justification of any projections based on the growing population in respect of Brexit and the Government's commitment to reducing immigration. Indeed, Jonathan Portes, professor of economics at King's College London and former director of the National Institute of Economic and Social Research (NIESR), feels the population may even fall. He says: "They [population projections] depend on all sorts of factors which the ONS does not pretend to be able to forecast or model. My view is that I think EU migration will fall very significantly over the next couple of years, and migration overall will fall. Therefore, the population increase may be significantly slower than the ONS says."
84	1304	Local Resident	Nicholas Kasic		Housing	H4		There are widespread concerns about lack of commitment to building affordable family homes, as OPDC seems committed to extending North Acton with plans for housing for transient renters and students. Justification is required as to how these transient populations will build a sustainable community. Monofunctional land uses are contrary to the overall spatial vision of the plan.
84	1305	Local Resident	Nicholas Kasic		Housing	H2		There are also concerns that that affordable housing isn't actually affordable to people who most need it. We need information as to the income level required to be able to afford these homes, and justification for that decision.
84	1306	Local Resident	Nicholas Kasic		Housing	H1		We ask why OPDC has lacked vision in exploring new concepts in housing such as re-zoning industrial areas to mixed use to enable local self-builds above existing businesses. (See GUA response.)
85	1316	Local Resident	Francis, Marc and Caroline Sauzier		Housing	H1		We believe that there is no justification for the number of homes indicated in the Local Plan: 24,000 new homes. The OPDC has provide no modelling based on different projections of housing numbers.
85	1317	Local Resident	Francis, Marc and Caroline Sauzier		Housing	H1		We would ask for justification of any projections based on the growing population in respect of Brexit and the Government's commitment to reducing immigration. Indeed, Jonathan Portes, professor of economics at King's College London and former director of the National Institute of Economic and Social Research (NIESR), feels the population may even fall. He says: "They [population projections] depend on all sorts of factors which the ONS does not pretend to be able to forecast or model. My view is that I think EU migration will fall very significantly over the next couple of years, and migration overall will fall. Therefore, the population increase may be significantly slower than the ONS says."
85	1331	Local Resident	Francis, Marc and Caroline Sauzier		Housing	H4		There are widespread concerns about lack of commitment to building affordable family homes, as OPDC seems committed to extending North Acton with plans for housing for transient renters and students. Justification is required as to how these transient populations will build a sustainable community. Monofunctional land uses are contrary to the overall spatial vision of the plan.

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85	1332	Local Resident	Francis, Marc and Caroline Sauzier		Housing	H2		There are also concerns that that affordable housing isn't actually affordable to people who most need it. We need information as to the income level required to be able to afford these homes, and justification for that decision.
85	1333	Local Resident	Francis, Marc and Caroline Sauzier		Housing	H1		We ask why OPDC has lacked vision in exploring new concepts in housing such as re-zoning industrial areas to mixed use to enable local self-builds above existing businesses. (See GUA response.)
87	1363	Local Resident	Patrick Munroe		Housing	H1		We believe that there is no justification for the number of homes indicated in the Local Plan: 24,000 new homes. The OPDC has provide no modelling based on different projections of housing numbers.
87	1364	Local Resident	Patrick Munroe		Housing	H1		We would ask for justification of any projections based on the growing population in respect of Brexit and the Government's commitment to reducing immigration. Indeed, Jonathan Portes, professor of economics at King's College London and former director of the National Institute of Economic and Social Research (NIESR), feels the population may even fall. He says: "They [population projections] depend on all sorts of factors which the ONS does not pretend to be able to forecast or model. My view is that I think EU migration will fall very significantly over the next couple of years, and migration overall will fall. Therefore, the population increase may be significantly slower than the ONS says."
87	1378	Local Resident	Patrick Munroe		Housing	H4		There are widespread concerns about lack of commitment to building affordable family homes, as OPDC seems committed to extending North Acton with plans for housing for transient renters and students. Justification is required as to how these transient populations will build a sustainable community. Monofunctional land uses are contrary to the overall spatial vision of the plan.
87	1379	Local Resident	Patrick Munroe		Housing	H2		There are also concerns that that affordable housing isn't actually affordable to people who most need it. We need information as to the income level required to be able to afford these homes, and justification for that decision.
87	1380	Local Resident	Patrick Munroe		Housing	H1		We ask why OPDC has lacked vision in exploring new concepts in housing such as re-zoning industrial areas to mixed use to enable local self-builds above existing businesses. (See GUA response.)
88	1390	Local Resident	Lily Gray		Housing	H1		We believe that there is no justification for the number of homes indicated in the Local Plan: 24,000 new homes. The OPDC has provide no modelling based on different projections of housing numbers.
88	1391	Local Resident	Lily Gray		Housing	H1		We would ask for justification of any projections based on the growing population in respect of Brexit and the Government's commitment to reducing immigration. Indeed, Jonathan Portes, professor of economics at King's College London and former director of the National Institute of Economic and Social Research (NIESR), feels the population may even fall. He says: "They [population projections] depend on all sorts of factors which the ONS does not pretend to be able to forecast or model. My view is that I think EU migration will fall very significantly over the next couple of years, and migration overall will fall. Therefore, the population increase may be significantly slower than the ONS says."
88	1405	Local Resident	Lily Gray		Housing	H4		There are widespread concerns about lack of commitment to building affordable family homes, as OPDC seems committed to extending North Acton with plans for housing for transient renters and students. Justification is required as to how these transient populations will build a sustainable community. Monofunctional land uses are contrary to the overall spatial vision of the plan.
88	1406	Local Resident	Lily Gray		Housing	H2		There are also concerns that that affordable housing isn't actually affordable to people who most need it. We need information as to the income level required to be able to afford these homes, and justification for that decision.
88	1407	Local Resident	Lily Gray		Housing	H1		We ask why OPDC has lacked vision in exploring new concepts in housing such as re-zoning industrial areas to mixed use to enable local self-builds above existing businesses. (See GUA response.)
89	1427	Local Resident	Nicky Guymer		Housing	H1		TITRA questions the Local Plan's strategy of delivering 24,000 homes. This target comes from the former Mayor Johnson's vision for the area, not from objective assessment of whether this area's roads can cope with such large-scale regeneration. TITRA notes that 'Old Oak North' (the Car Giant/London & Regional Properties site) has done studies and cut its target from 9,000 to 6,500 in its master plan consultation.
89	1443	Local Resident	Nicky Guymer		Housing			TITRA is every concerned that the very large number of construction workers involved in HS2 and the area's redevelopment may need some new, more imaginative approaches to housing them. TITRA wants to see the OPDC working closely with stakeholders such as HS2 and London & Regional to develop policies that contain construction personnel's accommodation to development sites - as well as reducing HMOs' harmful impacts on existing residential areas
91	1459	Local Resident	Bruce Stevenson		Housing	H1		TITRA questions the Local Plan's strategy of delivering 24,000 homes. This target comes from the former Mayor Johnson's vision for the area, not from objective assessment of whether this area's roads can cope with such large-scale regeneration. TITRA notes that 'Old Oak North' (the Car Giant/London & Regional Properties site) has done studies and cut its target from 9,000 to 6,500 in its master plan consultation.
91	1475	Local Resident	Bruce Stevenson		Housing			TITRA is every concerned that the very large number of construction workers involved in HS2 and the area's redevelopment may need some new, more imaginative approaches to housing them. TITRA wants to see the OPDC working closely with stakeholders such as HS2 and London & Regional to develop policies that contain construction personnel's accommodation to development sites - as well as reducing HMOs' harmful impacts on existing residential areas
92	1514	Community Group	Tom Ryland	Hammersmith Society	Housing	H1		There are opportunities to build new social housing on publicly owned land and we would support any ways to deter foreign and buy-to-let investment.
92	1515	Community Group	Tom Ryland	Hammersmith Society	Housing	H2		We note in 3.25 (and H2) that a target of 50% of the total units should be affordable, although it is not clear what proportion of these will be reduced market sale, intermediate/shared ownership or low rent. We are also unclear as to how this is to be achieved bearing in mind developers use of viability arguments to avoid the provision of affordable units. In any event, this target seems unrealistic when the Mayor appears to be prepared to accept a proportion of nearer 35% (or less) in certain circumstances. (eg. The schemes so far approved as above). We note that this figure also happens to equate with the threshold for proof of viability.
92	1516	Community Group	Tom Ryland	Hammersmith Society	Housing	H3		There is a further conflict in the provision of housing, and the ambition to achieve 'Lifetime Neighbourhoods'. The revised Plan requires that 25% of the units provided should be family units of 'three beds plus', and that these should be located at either ground floor with gardens or at first floor with good

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								access to private open space. With the likely heights of residential buildings as a consequence of the density requirements, these requirements will be impossible to achieve. In any event, we would suggest that to achieve sustainable neighbourhoods, avoid transience and deal with the genuine demands for affordable housing, the proportion of 'family' units should be greater than 25%. We note the original draft Plan envisaged a proportion of nearer 50%.
92	1517	Community Group	Tom Ryland	Hammersmith Society	Housing	H5		There are a considerable number of existing residential communities in the OPDC area, and the value of these in providing a range of types of housing and retaining existing character of these areas should be recognised. They should be brought back into full occupancy and possibly linked together within their own boundary definition.
92	1521	Community Group	Tom Ryland	Hammersmith Society	Housing	H2		As part of part of our original submission, we had agreed with the GUA that OPDC needed to undertake the following urgent action and in our view this is outstanding in order for the Plan to be positively prepared and effective: Analyse the number of affordable and family sized homes that can be provided.
92	1647	Community Group	Tom Ryland	Hammersmith Society	Housing	H1		Hi : Housing Supply. As stated above under SP2 and SP4, we do not think the housing policy H1 is Positively Prepared or Justified. We reiterate our comments on housing targets made under Spatial Vision. We question both the overall provision and the effect on the quality of housing that will be produced to achieve those targets.
92	1649	Community Group	Tom Ryland	Hammersmith Society	Housing	H1	8.13	H1 para 8.13 There are opportunities to build new social housing on publicly owned land and we would support any ways to deter foreign and buy-to-let investment. Para 8.13 promises to work to discourage vacancy but does not say how. Without regulatory powers, it is likely housing will become "Buy to leave".
92	1650	Community Group	Tom Ryland	Hammersmith Society	Housing	H1	8.14	8.14 importantly recognizes the need to monitor new housing delivery.
92	1651	Community Group	Tom Ryland	Hammersmith Society	Housing	H2		H2 Affordable Housing. We note from the Housing information session that 1) the target quota of affordable housing is now 50%; and 2) that if 35% affordable is offered then developers would not have to produce a viability study. This means that 35% affordable will effectively become the standard. In that case developers should be expected to make larger CIL/ Section 106 payments.
92	1652	Community Group	Tom Ryland	Hammersmith Society	Housing	H2	8.3	The text of these policies is supported by precedent illustrations which almost invariably are of buildings 6-14 storeys height. This cannot be regarded as being Positively Prepared when it is clearly misleading: the densities mentioned cannot be delivered at these heights. In this respect the Plan must be regarded as unsound.
92	1653	Community Group	Tom Ryland	Hammersmith Society	Housing	H3		H3: Housing Mix. We are concerned at the apparent contradiction between the Policy H3(a) requirement to provide 25% of all units as family housing (3 bed plus) against the text at 8.32 whereby the identified needs are of 51% and 64% of affordable and market housing respectively. This downgrading of the requirement for family units is most disappointing. The Society has been critical of the housing mix in the three major schemes approved to date (Oaklands, North Kensington Gate and Mitre Yard) for their low ratios of family units and also trying to part justify this by defining 2 bedroom units as 'family units'. Apart from not satisfying housing needs, the policy will mitigate against the establishment of sustainable neighbourhoods. We believe that OPDC needs to be firmer with developers to achieve greater provision of 3 bed plus units.
92	1654	Community Group	Tom Ryland	Hammersmith Society	Housing	H3		Other parts of the policy and the supporting text seem to be misplaced in this section and are more relevant to the next section
92	1655	Community Group	Tom Ryland	Hammersmith Society	Housing			H4: Design of Family Housing. We believe it would be helpful if the Housing section included more specific reference to appropriate policies on Housing Design.
92	1656	Community Group	Tom Ryland	Hammersmith Society	Housing			It is not necessary or appropriate for us to provide a whole treatise on the quality of housing to be provided, as we accept that there is a huge raft of information available not least from the GLA itself as to what constitutes good housing. We have already commented on the need to provide a wide range of house types and avoid excessive densities and heights
92	1657	Community Group	Tom Ryland	Hammersmith Society	Housing	H2		The need for a wide variety of tenures including genuinely affordable rented accommodation.
92	1658	Community Group	Tom Ryland	Hammersmith Society	Housing	h4		The housing policies suggest that all family units (3 beds +) should be at ground floor level with gardens or at first floor level with access to generous external private amenity space. This will be impossible to achieve if the majority of the housing provision is to be based upon towers of 20 storeys and more.
92	1659	Community Group	Tom Ryland	Hammersmith Society	Housing			Recognition needs to be given to ensure that the housing provided is of a varied style, mix and set in environments to ensure that it is a pleasant place where people will want to live.
92	1660	Community Group	Tom Ryland	Hammersmith Society	Housing	H3	8.37	Long term flexibility as envisaged in text 8.37 is welcomed
92	1661	Community Group	Tom Ryland	Hammersmith Society	Housing	H1		Where units are provided on a market price basis, they are offered to local people and Londoners on a priority basis.
92	1662	Community Group	Tom Ryland	Hammersmith Society	Housing			Internal space standards should comply with London Plan recommendations as a minimum.
92	1666	Community Group	Tom Ryland	Hammersmith Society	Housing	H5		H5: Existing Housing: We strongly consider existing housing should be retained, to prevent loss of existing housing numbers and to keep area character.
92	1667	Community Group	Tom Ryland	Hammersmith Society	Housing	H6		H6: Build to Rent: We have no objections to the Build for Rent policy.

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92	1668	Community Group	Tom Ryland	Hammersmith Society	Housing	H7		H7: Purpose-Built Shared Housing and Existing HMOs. We have already stated that we believe that it is most important that the widest possible range of housing and tenures are provided. We think that too often rental options are not offered by either public or private agencies. Private Rented units including HMO's should be encouraged and licensed where appropriate for larger units and where possible with longer durations. We support the Policies in both cases.
92	1669	Community Group	Tom Ryland	Hammersmith Society	Housing	H8		H8: Gypsy and Traveller Accommodation. We note the Policy Option and the potential difficulties of identifying sites.
92	1671	Community Group	Tom Ryland	Hammersmith Society	Housing	H9		H9: Specialist Housing. We think there needs to be an effective provision of specialist housing including sheltered type housing for elderly people, and for other vulnerable members of the community that need support including those with mental health difficulties.
92	1672	Community Group	Tom Ryland	Hammersmith Society	Housing	H10		H10: Student accommodation. We support the Policy approach to the provision of student accommodation, and the highlighting of some of the associated design and management problems set out.
93	1738	Residents Association		Wells House Road Residents Association	Housing	H1		We believe that there is no justification for the number of homes indicated in the Local Plan: 24,000 new homes. The OPDC has provide no modelling based on different projections of housing numbers.
93	1739	Residents Association		Wells House Road Residents Association	Housing	H1		We would ask for justification of any projections based on the growing population in respect of Brexit and the Government's commitment to reducing immigration. Indeed, Jonathan Portes, professor of economics at King's College London and former director of the National Institute of Economic and Social Research (NIESR), feels the population may even fall. He says: "They [population projections] depend on all sorts of factors which the ONS does not pretend to be able to forecast or model. My view is that I think EU migration will fall very significantly over the next couple of years, and migration overall will fall. Therefore, the population increase may be significantly slower than the ONS says."
93	1753	Residents Association		Wells House Road Residents Association	Housing	H4		There are widespread concerns about lack of commitment to building affordable family homes, as OPDC seems committed to extending North Acton with plans for housing for transient renters and students. Justification is required as to how these transient populations will build a sustainable community. Monofunctional land uses are contrary to the overall spatial vision of the plan.
93	1754	Residents Association		Wells House Road Residents Association	Housing	H2		There are also concerns that that affordable housing isn't actually affordable to people who most need it. We need information as to the income level required to be able to afford these homes, and justification for that decision.
93	1755	Residents Association		Wells House Road Residents Association	Housing	H1		We ask why OPDC has lacked vision in exploring new concepts in housing such as re-zoning industrial areas to mixed use to enable local self-builds above existing businesses. (See GUA response.)
94	1779	Local Resident	Oonagh Heron		Housing	H1		24,000 homes: As the solid traffic on Old Oak Lane attests to every evening, the road infrastructure cannot currently cope. Adding 24,000 more homes to the area will create longer and more extensive gridlock, not to mention demands on local healthcare facilities. I am unaware of any objective assessment of the impact of such numbers on local infrastructure and without that the numbers seem unreasonable. I believe other local sites have cut their targets.
95	1783	Local Resident	Mark Walker		Housing	H1		I object to the Local Plan's strategy of delivering 24,000 homes – it's too much. This target doesn't come from an objective assessment of whether this area's roads can cope with. We've seen that Car Giant/London & Regional did proper studies and cut their target homes from 9,000 to 6,500.
95	1799	Local Resident	Mark Walker		Housing			I'm worried that very large number of construction workers involved in HS2 and the area's redevelopment will need some new, more imaginative approaches to housing them. I want to see policies under Policy P2, EU4, and EU6 and Housing, that require the OPDC working with stakeholders such as HS2 and London & Regional to set up policies that contain construction personnel's accommodation to development sites - as well as reducing HMOs' harmful impacts on existing residential areas.
95	1804	Local Resident	Mark Walker		Housing	H7		I am dismayed that Policy H7 does not recognise the serious social, health & safety problems that HMOs are causing in enclaves like the railways cottages, Wells House Road and the Wesley Estate; these problems are already ruining the amenity and quality of life in each area. Existing and local authorities are failing in their duties of licensing and taking enforcement measures against rogue properties when there is such a high number of HMOs. Plan Paragraph 8.6.3. even discusses them if they are a theoretical issue which is wholly inadequate. I want an extra set of Policies in H7 that require the OPDC and local boroughs and HMOs landlords to: -strengthen and properly resource the licensing of all such properties -properly monitor HMOs and sign landlords and tenants up to codes of practice on controls and acceptable behaviour including proper waste collection and recycling respectively -properly fund enforcement action against of troublesome landlords and HMO sites in all affected boroughs over the entire regeneration period.
97	1819	Local Resident	Ralph Scully		Housing	H1		We believe that there is no justification for the number of homes indicated in the Local Plan: 24,000 new homes. The OPDC has provide no modelling based on different projections of housing numbers.
97	1820	Local Resident	Ralph Scully		Housing	H1		We would ask for justification of any projections based on the growing population in respect of Brexit and the Government's commitment to reducing immigration. Indeed, Jonathan Portes, professor of economics at King's College London and former director of the National Institute of Economic and Social Research (NIESR), feels the population may even fall. He says: "They [population projections] depend on all sorts of factors which the ONS does not pretend to be able to forecast or model. My view is that I think EU migration will fall very significantly over the next couple of years, and migration overall will fall. Therefore, the population increase may be significantly slower than the ONS says."
97	1834	Local Resident	Ralph Scully		Housing	H4		There are widespread concerns about lack of commitment to building affordable family homes, as OPDC seems committed to extending North Acton with plans for housing for transient renters and students. Justification is required as to how these transient populations will build a sustainable community. Monofunctional land uses are contrary to the overall spatial vision of the plan.

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97	1835	Local Resident	Ralph Scully		Housing	H2		There are also concerns that that affordable housing isn't actually affordable to people who most need it. We need information as to the income level required to be able to afford these homes, and justification for that decision.
97	1836	Local Resident	Ralph Scully		Housing	H1		We ask why OPDC has lacked vision in exploring new concepts in housing such as re-zoning industrial areas to mixed use to enable local self-builds above existing businesses. (See GUA response.)
100	1881	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Housing	H1		The Housing Evidence Statement, published as a supporting study to the Regulation 19 Draft Plan re-asserts at paragraph 2.4 The regeneration of Old Oak is identified in the London Plan as having the capacity to accommodate over 24,000 new homes. Paragraph 5.3 of the Statement repeats the view from the previous OPDC Development Capacity Study For the period of the Local Plan (2018 to 2038), OPDC's DCS is showing that approximately 22,000 homes can be delivered. We view the evidence base to support these statements to be slim and hence the consequential policies in the Local Plan to be unsound.
100	1882	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Housing	H1		Paragraph 6.0 of the Housing Evidence Statement (Supporting document 23 to the Regulation 19 Local plan) refers back to the previous OPDC Strategic Housing Market Assessment (SHMA). As noted in our comments on the Regulation 18 Draft Plan, the SHMA prepared for the OPDC by Opinion Research Services itself acknowledges 'From a technical point of view, OPDC represents a challenging SHMA because at the time of the 2011 Census there were approximately 7,000 residents in the area and 2,800 households'. Hence a choice was made by these consultants to assess housing need across the three boroughs, and then to suggest figures of 44,800 affordable units (48%) and 44,400 market units (52%) as being required across all three boroughs over the 20-year OPDC Local plan period. Paragraph 6.6 of the Housing Evidence Statement says: As well as providing homes to meet the market and affordable housing need in the three host boroughs as identified in OPDC's SHMA, the area is also capable of providing homes to meet wider strategic, London-wide housing need. How many 'additional' new homes should be provided at Old Oak to meet London's wider needs is surely a matter of planning judgment, on which alternatives should be explored and the consultation responses at Regulation 18 stage taken into account? Conventional techniques for deriving housing need figures do not apply to large tracts of undeveloped land in inner London. However, in the Housing Evidence Statement and throughout other supporting material for the Regulation 19 Local Plan, the 24,000 figure from the Annexe to the London Plan resurfaces in a set of circular arguments. These are used to justify what local people view as a target set in a 'vision' of the former Mayor long before sufficient work had been done on the feasibility and infrastructure costs of bringing a large area of brownfield land into housing use. We do not believe that this approach will lead to a sustainable and successful new part of London.
100	1985	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Housing	H1		The views of the Interim Forum on Policy H1 Housing Supply have been covered in paragraphs 5 and 6 of this response. We consider policy H1 to be not justified, nor positively prepared because of the lack of solid evidence base for the 22,350 new homes figure to be delivered during the plan period.
100	1986	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Housing	H1		Sub-policy H1f) on marketing of homes to a London audience we see as not effective as the supporting text at 8.13 does not explain how policy this would be achieved in practice.
100	1987	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Housing	H2		On Affordable Housing, we note that Strategic Policy SP4 sets an overall target of 50% affordable housing and Policy H2 adopts the threshold approach to viability as set out in the Mayor of London's Affordable Housing and Viability SPG. We do not consider Policy H2 to be effective in that it sets an unrealistic target of 50% affordable homes when it is clear that infrastructure costs of opening up sites in Old Oak will absorb large proportions of S106 and CIL resources.
100	1988	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Housing	H2		Evidence to date of permissions granted by the OPDC, coupled with Policy H2a) committing to follow Mayoral guidance, suggests that developers will increasingly pursue affordable housing offers of 35% of units within a development, at 20% discounted market rent (i.e. 80% of market rent).
100	1989	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Housing	H2		As we understand, the OPDC SHMA (Supporting Statement No.43) forecasts a level of need for affordable housing at Affordable London Rent of which only a third would be met with a scenario of 35% affordable housing delivered, under the 30/70 split between types of affordable units in Policy HS2c).
100	1990	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Housing	H3		On Policy H3 on Housing Mix, we consider this to be not justified. Unless a higher target than 25% is set for family homes, Old Oak will not become a sustainable and successful part of London. As evidenced by planning applications to date in Scrubs Lane, the development market continues to prioritise 1 and 2 bed units. The SHMA and supporting text 8.32 of this policy suggest a need for a target for 51% for family sized affordable housing and 64% family sized market housing.
100	1991	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Housing	H10		On Policy H10 on Student Housing, we consider this to be not justified. This response has already commented on the harmful impact of an excessive concentration of student housing at North Acton (paragraph 16). We support the detailed case in the response made by the Grand Union Alliance, for Policy H10 to be enhanced and strengthened.
100	1992	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Housing	H1		The Housing policies in the Plan do not appear to include one for self-build and custom-build. In a part of London with much land in public ownership, and with uncertainties over whether planned phasing of market housing will take place as hoped, it would seem important that the Plan establishes a clear approach to the identification of suitable sites for self-build and custom-build. An army of construction workers will be working in the area for decades. Opportunities for self-build may relieve some of the pressures on privately rented and HMO accommodation in the residential areas in and around Old Oak, as well as the demands on the local transport network.
100	1993	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Housing	H7		The Plan's Policy H7 paragraph 8.6.3. which does not sufficiently recognise the social and health and safety problems that unlicensed HMOs are already causing in enclaves like the railway cottages, Wells House Road and the Wesley Estate. In addition, these trends are harming local amenity (heavier use and damage to pavements and unadopted roads from multiple vehicles). It is also known that Old Oak's local authorities are struggling to complete licensing and enforcement measures against rogue HMOs given the high number of these properties in the development zone.
100	1994	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Housing	H7		We wish to see additional policies, under Policy H7, that require the OPDC and local boroughs to draw up more robust frameworks to licence and monitor HMOs including related codes of practice for both landlords and tenants, building them into planning approvals.

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100	1995	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Housing	H7		In addition, we require the OPDC and London boroughs to examine a more robust framework for enforcement measures against rogue HMO landlords or antisocial tenants.
100	1999	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Housing			Policy constraints set in a Local Plan may well prove a serious hindrance to meeting the short/medium term housing needs of a large army of construction workers on the HS2/Crossrail interchange. Unless there are flexible means of providing relatively low-cost housing in the local area, the growing pressure on existing residential areas via HMOs and private rented housing at the bottom end of the rental scale will become overwhelming. Traffic congestion in the area will worsen.
102	2023	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		Harlesden Lets firmly believes that new housing must be affordable to those on below average incomes who are in unsatisfactory housing in the three boroughs;
102	2024	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		There must be strong safeguards to prevent current residents in the area and surrounding areas from being priced out of their communities and assured tenancies with security of tenure at rents capped at the Local Housing Allowance limit would be one solution
102	2037	Community Group	Jacky Peacock	Harlesden Lets	Housing	H1		This policy is not justified. The absorption rate of 700 market homes (not including affordable homes) per annum which informs this policy makes very ambitious assumptions that there will be numerous significant development sites delivering at any one time and that any market sales saturation effect from the combination of seven competing developers will not arise.
102	2039	Community Group	Jacky Peacock	Harlesden Lets	Housing	H6		Bringing vacant dwellings back into use through robust policies for serving Empty Dwelling Management Orders and Compulsory Purchase Orders should also be a consideration. Properties thus acquired should be used for social housing or offered on long-term private tenancies as below market rents, which Harlesden Lets would be delighted to manage, thus creating quality management and tenancy support as well as local employment opportunities.
102	2040	Community Group	Jacky Peacock	Harlesden Lets	Housing	H1		The reference to 'windfall housing' sites should be extended to take a serious look at the potential development on small sites, including above retail premises.
102	2041	Community Group	Jacky Peacock	Harlesden Lets	Housing	H1		There should be a policy for 'bespoke housing solutions' to maximise use of difficult sites and/or land and property owners who would need support with things like business plans, raising investment finance, design, etc. using experts within the OPDC and the three boroughs.
102	2043	Community Group	Jacky Peacock	Harlesden Lets	Housing	H1		Similar arrangements should be made to increase homes in the Harlesden area to help to off-set the huge impact on Harlesden residents.
102	2044	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		The policy is not sound – it is not justified, it fails to meet objectively assessed need and is not positively prepared. There is inadequate evidence to justify delivery of 50% affordable housing as is made clear in para 8.18. The whole plan viability suggests a more likely general delivery of 35% affordable housing with fingers-crossed that some sites might deliver 50%. The competing demands on developers for necessary infrastructure cost simply add to the problem of this wishful thinking.
102	2045	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		The gap between assessed need and likely deliverability is extreme in terms of London Affordable Rent Homes. The SHMA assesses that 86% of the identified 44% of households would need social rented homes. The policy sets at 30% (of the affordable homes) target to be London Affordable Rent (the substitute for social-rented homes). This would provide just 10.5% of homes delivered at Affordable Rent Homes (meeting less than a quarter of need) with a scenario of 35% affordable homes delivered. This would rise only to 15% (only a third of need) where 50% of homes are delivered.
102	2046	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		There is particular concern that to date (in terms of planning applications approved) delivery is 25% affordable housing and just 5% London Affordable Rent. The London Affordable rent comprises 19% of the affordable housing. (Note that these figures include conventional and non-conventional homes as the OPDC would in monitoring delivery of housing targets – i.e. includes student rooms).
102	2047	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		Given that it is assumed that the OPDC area will meet a considerable level of need identified within the SHMA (amounting to some 23% of the housing delivery) failures by the OPDC to deliver its proportionate level of London Affordable Rent homes will place a heavier weight on the boroughs to deliver and could have negative impact. How the OPDC will co-operate with the boroughs to meet the objectively assessed need of the housing market area is also notably absent from policy H2.
102	2048	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		The cost of other 'affordable housing' is unlikely to be affordable to households with below median incomes (that is the bottom half of households by income). The new population would then be predominantly from the top half of households (by income) not constituting a balanced mix of incomes.
102	2049	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		The SHMA identifies that only 7% of those assessed as needing affordable housing would be able to meet the cost of London Living Rent Homes. The GLA requires that households accessing London Living Rent homes must be 'middle income' earners that are already renting and able to put money away to meet the cost of buying or part buying a home at a later date. Thus, these would not be accessible to households on the boroughs' housing waiting list.
102	2050	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		Policy SP1 3.5, which notes levels of deprivation in areas outside but at the edge of the OPDC area and says 'it is important that Old Oak and Park Royal brings tangible benefit for [deprived] local communities' will also be compromised
102	2051	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		There is some fear that delivery of high levels of high cost market housing in the OPDC area will impact on rising property prices in neighbouring areas with the potential of displacing rather than meeting need of lower income households. In April 2017, The Telegraph reported that "This nook of north-west London [Harlesden] has seen the biggest growth in property prices in the capital in the past year at 14.6 per cent, according to research by Hamptons. That's more than double the London average of 6.1 per cent." Given that policy SP1 Catalyst for Growth c)ii & iii and paras 3.4 & 3.5: clearly assert that the regeneration of Old Oak and Park Royal will bring tangible benefits for local communities and offers life improving conditions it is essential that the OPDC address the issue of potentially negative impact in terms of housing costs and affordability in neighbouring wards..
102	2052	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2	Table 8.2	Policy H2 table 8.2 description of London Living Rent is inadequate. This should also state that households must also already be renting and want to build up money to buy their home.

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102	2053	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2	Table 8.2	The description of London Affordable Rent (also table 8.2) should also be amended to say 'Capped' Target Rents set in accordance with government guidance and excluding service charges.
102	2054	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		"Affordable" should be used to mean what the average person would take it to mean, and not distorted to include rents which only high earners can comfortably afford. This provision should be a 'commitment' not an 'aspiration'
102	2055	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		Harlesden Lets supports the option of Affordable Housing and believes that the fixed percentage of affordable housing should only be flexible in that, if it is really impossible to achieve on one development, this should be compensated for with a higher percentage on other sites.
102	2056	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		Where developers argue that the fixed percentage is not viable, they should be asked to produce their detailed costings and these should be scrutinised by those qualified to do so, questioned, and where appropriate rejected.
102	2057	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		Under H2 (d), Harlesden Lets feel that the tenure of these homes must be assured (non-shorthold) tenancies in order to support delivery of Lifetime Neighbourhoods (Policy SP2 Good Growth and SP4 Thriving Communities) so that private tenants who can afford them can be to be socially included in their community. This is in contrast to the 'social exclusion' created by shorthold tenancies
102	2058	Community Group	Jacky Peacock	Harlesden Lets	Housing	H6		We agree with the proposal for discounted private rented homes, which should be in perpetuity, and also that Build to Rent homes will not be expected to be offered to tenants to buy as this would exclude a number of tenants who are not in a position to aspire to buy (para 8.49).
102	2059	Community Group	Jacky Peacock	Harlesden Lets	Housing	H3		It is disappointing that there has been such a scaling down of proposed target for family sized housing from 53% family sized housing in the affordable housing sector in the regulation 18 consultation to 25% (across the sectors) in the regulation 19 Local Plan. The SHMA suggests the need for 51% affordable family sized homes; around a third of which would need to be 4-bedrooms+ and 64% family sized market homes. This creates an extremely wide gap between evidence and the proposal of meeting need. Failure to contribute to meeting a proportion of need identified in the housing market are will create negative impact outside the OPDC boundaries.
102	2060	Community Group	Jacky Peacock	Harlesden Lets	Housing	H3		This is of high concern given the levels of overcrowding identified in the SHMA – in 26.7% homes (84,227 in 2011) homes in the housing market area. Overcrowding has huge impact on health including links with TB, accidents in the home, mental health, respiratory and infectious diseases, educational development and difficulties for children in finding space to study, lack of privacy, anxiety and depression.
102	2061	Community Group	Jacky Peacock	Harlesden Lets	Housing	H3		It is vital that priority is given to large family size accommodation and that it is available to existing residents in the area and surrounding areas. Suggesting 3+ bedrooms is inadequate. Harlesden Lets suggests Policy H3 should include a target for four and five-bedroom sized homes.
102	2065	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		Harlesden Lets also has concerns at the affordability of homes for those working in lower paid and lower skilled jobs.
102	2066	Community Group	Jacky Peacock	Harlesden Lets	Housing	H3		The OPDC should set out how it will co-operate with the three boroughs to meet the objectively assessed need for family-sized homes in order to reduce rather than increase existing levels of overcrowding.
102	2067	Community Group	Jacky Peacock	Harlesden Lets	Housing	H3		Given that the OPDC is principally creating a new area here, there are questions around what the future demographic may comprise and whether lifetime neighbourhoods will be created. Will there be sufficient family-sized homes for smaller households moving into the area to grow and stay here longer term? How will the composition of the area compare with surrounding areas? There is an evidence / data gap here as highlighted in the Integrated Impact Assessment.
102	2068	Community Group	Jacky Peacock	Harlesden Lets	Housing	H3		Harlesden Lets would be pleased to pay a role in supporting families in private rented accommodation.
102	2069	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		There is a general concern about the impact of the development in the OPDC area on house prices in Harlesden. There is also the impact on Harlesden Lets and its aims to make a contribution to addressing housing need in Harlesden - in working with ethical landlords to let and manage properties well and to charge a bit below market rents; motivated by meeting need rather than making a huge profit.
102	2070	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		There is also the impact of construction over 20 or more years on private renting in Harlesden and the possibility of this resulting in an increase in poorer quality private renting. Construction workers will be looking for cheapest places to rent and that will be predominantly in Harlesden.
102	2071	Community Group	Jacky Peacock	Harlesden Lets	Housing	H3		The OPDC must contribute proportionately to meeting the need identified in the housing market area of Brent, Ealing and Hammersmith and Fulham, or the result will be placing increased need on the boroughs. The SHMA and supporting text 8.32 of this policy suggest a need for a target for 51% for family sized affordable housing and 64% family sized market housing. The 25% target is much too low and will leave families already living in overcrowded homes to experience ever greater need. In Brent 30% of homes are overcrowded and the SHMA says that 27% of homes across the whole market area are overcrowded.
102	2072	Community Group	Jacky Peacock	Harlesden Lets	Housing	H3		We are particularly concerned about the need for larger family sized - four and five-bedroom homes. The SHMA shows that 16% of affordable housing should be four and five-bedroom homes.
102	2073	Community Group	Jacky Peacock	Harlesden Lets	Housing	H3		The London Assembly Housing and Planning Report 'Crowded Homes' of 2011, highlighted in sections 3.3 and 3.4 that while building a small one or two bedroom home will take one family out of temporary housing (impacting on two, three or four Londoners) , building a 6 bed home of an overcrowded family creates a down chain – that could solve the problem for 36 Londoners). https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Final%20overcrowding%20report%20-%20print%20version.pdf Given that there is much greater levels of overcrowding for black and Asian households (nb 2008 studies found this to be 4 times greater) this also has an equalities impact.
102	2074	Community Group	Jacky Peacock	Harlesden Lets	Housing	H5		The policy is not effective. There should be a consistent and robustly applied policy for EDMOs and CPOs; with a mechanism for dealing swiftly with appeals. Harlesden Lets would be pleased to let and manage empty properties, including overseeing the work needed to bring them up to the required standard.
102	2075	Community Group	Jacky Peacock	Harlesden Lets	Housing	H5		The Plan needs to specify how exactly it will resist loss of existing housing. The policy should support retrofitting on new homes. It should also ensure that where a proposal would result in new housing that it re-provides an equal amount of space, rooms and tenure.

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102	2076	Community Group	Jacky Peacock	Harlesden Lets	Housing	H6		The policy is not sound, it is not effective. Policy H6 (a) suggests that Build to Rent will provide affordable housing in the form of intermediate rental products. However, the London Mayor's Affordable Housing and Viability SPG says that this product will be delivered as discounted market rent (preferably at London Living Rent levels). Preferably does not mean necessarily. Is the OPDC saying that it will only approve developments that include Build to Rent schemes that are in the form of an intermediate rental product and that it would not approve applications for any that are above London Living Rent levels? If so, Policy H6 (a) should make this clearer – perhaps saying 'only in the form of affordable housing that are no higher than London Rent levels', or if not, it should make it clear that some Build to Rent schemes could be at higher than LLR levels.
102	2077	Community Group	Jacky Peacock	Harlesden Lets	Housing	H6		For the policy to be effective, the OPDC should set an annual target to measure/monitor delivery. This is important, because if this type of housing can be delivered by the private rented sector (without grant funding), potentially more money could be allocated to deliver Affordable Rent Homes (the nearest we have to social rents).
102	2078	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		The Private Rented Sector (PRS) is the fastest growing housing tenure in London and represents about 25% of London's housing market. It should be noted that in the adjoining area of Harlesden, the % of PRS was about 32% at the 2011 Census and is almost certainly approaching 40% now. The work of Harlesden Lets in working with landlords to provide decent, well maintained PRS homes at reasonable rents will be seriously undermined if the OPDC regeneration puts so much pressure on house prices that landlords will be forced to charge inflated rents in order to cover their own mortgage. This is our overriding concern because it could be a last nail in the coffin of a very deprived area, which is what we are trying to address. We want to see meaningful dialogue between the OPCD and community groups in Harlesden.
102	2079	Community Group	Jacky Peacock	Harlesden Lets	Housing	H6		Harlesden Lets has grave concerns that the new Build to Let properties will not be available/affordable for local people but will attract wealthy individuals and Company Lets from outside the area, thus increasing, rather than alleviating the pressures on the PRS in Harlesden. There must be delivery of sufficient Affordable Rent Homes to meet need to ensure that private renting is a tenure of choice rather than necessity.
102	2080	Community Group	Jacky Peacock	Harlesden Lets	Housing	H6		Harlesden Lets agrees with the proposal for discounted private rented homes, which should be in perpetuity, and the proposed 'deposit savings options' (7.55) should not be compulsory or a condition of the tenancies, as this will exclude a number of tenants who are not in a position to aspire to buy.
102	2081	Community Group	Jacky Peacock	Harlesden Lets	Housing	H6		Further, we would argue that these lets should be on assured (non-shorthold) tenancies to allow tenants security in order to be socially included and able to contribute to the community in a way that the majority of shorthold tenants feel unable to.
102	2082	Community Group	Jacky Peacock	Harlesden Lets	Housing	H2		The rental cost of a two-bedroom London Living Rent home in College Park and Old Oak ward (comprising most of the development area) is £959 a month. A household would need an income of £34,524 (based on a third of income) to meet the cost. Median household incomes in that ward are just £30,890, and across Brent are £32,140. It is important for the Plan to show how the needs of households with below median income levels will be addressed within the housing market area.
102	2083	Community Group	Jacky Peacock	Harlesden Lets	Housing	H6		H2 (d) Harlesden Lets feel that the tenure of these homes must be assured (non-shorthold) tenancies in order to support delivery of Lifetime Neighbourhoods (Policy SP2 Good Growth and SP4 Thriving Communities) through enabling private tenants who can afford them can be to be socially included in their community in a way that the majority of shorthold tenants feel unable to.
102	2084	Community Group	Jacky Peacock	Harlesden Lets	Housing	H7		Harlesden Lets welcomes the inclusion of HMOs and hostels which play a key role in meeting housing need. The way to prevent this type of accommodation from what is described as 'unacceptable impacts' (Preferred Option d.) is to ensure that these dwellings are intensively managed, and include, where appropriate, tenancy sustainment support. If this is provided by a community group such as Harlesden Lets, so much the better.
102	2085	Community Group	Jacky Peacock	Harlesden Lets	Housing	H7		Harlesden Lets would also stress that, unless the development adequately addresses the current acute shortage of housing that those on ordinary incomes can afford, it will only be a short time before other types of housing is turned into HMOs, with overcrowding and lack of adequate shared amenities, as this will be the only affordable option for many residents, particularly the growing number of migrant workers and refugees who are over-represented in this part of London and who continue to come in large numbers. We need to start meeting the needs of these groups instead of allowing the worst landlords to exploit them
102	2088	Community Group	Jacky Peacock	Harlesden Lets	Housing	H8		Regarding Gypsy and Travellers Accommodation, there are serious drainage problems on the Bashley Road site and associated health and safety problems (including rats) and inadequate basic facilities. Residents suffer pollution including noise and vibration from neighbouring industries sometimes also at night. The entrance to the site is a long and extremely poor-quality road with no paving (worse than other areas in Park Royal) and is poorly lit. The OPDC could ensure that, at the very least in the instance of the Bashley Road site, that an evidence base - a full assessment of current conditions (including infrastructure) and proposal for improvements are produced and improvements delivered.
102	2091	Community Group	Jacky Peacock	Harlesden Lets	Housing	H9		The policy is not effective. Harlesden Lets suggests that the provision of specialist housing be much clearer.
102	2092	Community Group	Jacky Peacock	Harlesden Lets	Housing	H3		There is also the need to 'future-proof' dwellings so that they are easier to adapt should residents become disabled. The design of such things as entrances, doors, bathrooms, kitchens should be open to the possibility of a disabled occupier in the future.
102	2093	Community Group	Jacky Peacock	Harlesden Lets	Housing	H10		It is unclear how 'vibrancy and diversity' H10a(i) is to be measured or monitored.
102	2094	Community Group	Jacky Peacock	Harlesden Lets	Housing	H10		To some, large areas of development of student accommodation and private housing such as that around North Acton is actually the creation of a transient community, consisting almost exclusively of one demographic – rather than a diverse lifetime neighbourhood. There is concern that this area particularly provides over concentration of student and single person dwellings to the exclusion of other forms of housing for which there is greater evidence of need. This also delivers types of supporting infrastructure, shops and services that don't meet wider needs.
102	2095	Community Group	Jacky Peacock	Harlesden Lets	Housing	H10		The area already accommodates 718 student bed spaces at 'The Costume Store' Victoria Road (former BBC costume store) 657 student bed spaces at NEC House, 1 Victoria Road. The Holbrook House application (approved in May 2017) is for 424 student bed spaces and Lyra

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								Court 184 This is a total 1,933 – meeting 60% of the need across the housing market area (3200 identified in the SHMA) – of the three boroughs. This is an incredible contrast with the targets and intended delivery of London Affordable Rent or family sized homes.
102	2096	Community Group	Jacky Peacock	Harlesden Lets	Housing	H3		Other developments and recently approved applications have a predominance of one-bedroom flats – adding further to the creation of an area that is neither mixed nor balanced. The development on the junction of Victoria and Chase Road is 151 residential units 55% of which are one-bedroom flats and only 2% with family sized accommodation. 6 Portal Way with 578 residential units includes 340 one-bedroom flats (59%) and only 5% family sized homes. (Total 432 one-bedroom flats and just 35 (5%) family sized homes).
102	2098	Community Group	Jacky Peacock	Harlesden Lets	Housing	H10	P7	what has already been delivered in North Acton should be deemed contrary to policy set out in H10a (iii) and (iv). Again, it's not clear how the OPDC will measure and monitor undermining of conventional self-contained housing supply and 'overconcentration' in any one specific location.
102	2099	Community Group	Jacky Peacock	Harlesden Lets	Housing	H10		The OPDC is responsible for catering for the needs of students along with the authorities in the housing market area, not those of any one university. We note the officers report relating to the Holbrooke House application (determined in August 2017) not meeting objectively assessed need assessed in the SHMA, but meeting a need identified by Imperial College - "The proposed student accommodation meets a need identified by Imperial College and ensures all first-year students attending the university will be provided with a college managed space". The policy should provide a map showing where there is existing student accommodation and where it may be appropriate to deliver any more (if meeting objectively assessed need) and where there is already overconcentration of student accommodation, where diversity of area threatened and it is therefore inappropriate to deliver any more.
102	2100	Community Group	Jacky Peacock	Harlesden Lets	Housing	H10		It should provide information of their co-operation with the boroughs in term of meeting objectively assessed need for student housing and what proportion of need the boroughs will provide, to prevent further overconcentration of student housing in the OPDC area and undermining of delivery of conventional self-contained housing supply.
102	2101	Community Group	Jacky Peacock	Harlesden Lets	Housing	H10		Additionally, the policy should require that student housing developments deliver the associated social and community infrastructure needed in order not to put additional stress on existing services (including health services).
103	2102	Local Resident	Dave Turner		Housing	H1		TITRA questions the Local Plan's strategy of delivering 24,000 homes. This target comes from the former Mayor Johnson's vision for the area, not from objective assessment of whether this area's roads can cope with such large-scale regeneration. TITRA notes that 'Old Oak North' (the Car Giant/London & Regional Properties site) has done studies and cut its target from 9,000 to 6,500 in its master plan consultation.
103	2118	Local Resident	Dave Turner		Housing			TITRA is every concerned that the very large number of construction workers involved in HS2 and the area's redevelopment may need some new, more imaginative approaches to housing them. TITRA wants to see the OPDC working closely with stakeholders such as HS2 and London & Regional to develop policies that contain construction personnel's accommodation to development sites - as well as reducing HMOs' harmful impacts on existing residential areas.
106	2193	Local Resident	Catherine Sookha		Housing	H1		We believe that there is no justification for the number of homes indicated in the Local Plan: 24,000 new homes. The OPDC has provide no modelling based on different projections of housing numbers.
106	2194	Local Resident	Catherine Sookha		Housing	H1		We would ask for justification of any projections based on the growing population in respect of Brexit and the Government's commitment to reducing immigration. Indeed, Jonathan Portes, professor of economics at King's College London and former director of the National Institute of Economic and Social Research (NIESR), feels the population may even fall. He says: "They [population projections] depend on all sorts of factors which the ONS does not pretend to be able to forecast or model. My view is that I think EU migration will fall very significantly over the next couple of years, and migration overall will fall. Therefore, the population increase may be significantly slower than the ONS says."
106	2208	Local Resident	Catherine Sookha		Housing	H4		There are widespread concerns about lack of commitment to building affordable family homes, as OPDC seems committed to extending North Acton with plans for housing for transient renters and students. Justification is required as to how these transient populations will build a sustainable community. Monofunctional land uses are contrary to the overall spatial vision of the plan.
106	2209	Local Resident	Catherine Sookha		Housing	H2		There are also concerns that that affordable housing isn't actually affordable to people who most need it. We need information as to the income level required to be able to afford these homes, and justification for that decision.
106	2210	Local Resident	Catherine Sookha		Housing	H1		We ask why OPDC has lacked vision in exploring new concepts in housing such as re-zoning industrial areas to mixed use to enable local self-builds above existing businesses. (See GUA response.)
107	2231	Residents Association	Mark Walker	TITRA	Housing	H1		TITRA questions the Local Plan's strategy of delivering 24,000 homes in the development zone – which target comes from the former Mayor Boris Johnson's vision for the area but it isn't based in detailed analysis of factors such as whether Old Oak's limited road infrastructure can cope with such large-scale regeneration. We still can't see in this draft Plan that this target has been 'objectively assessed'. We believe this policy doesn't follow planning law - unless we see evidence that alternatives that have been evaluated. We note that Planning policy 2, covering 'Old Oak North' (the Car Giant/London & Regional Properties site) has more realistic targets – from 9,000 in its first proposal to 6,500 in its masterplan consultation - because the landowner has sifted the evidence.
107	2232	Residents Association	Mark Walker	TITRA	Housing	H1		We think there is also a danger that, with Car Giant/London & Regional scaling back the homes it wants to build, the OPDC is being forced to allow planning applications with excessive densities elsewhere, to deliver its 24,000 homes target. This could be why Genesis Housing / QPR's Oaklands development was quickly approved with a very basic public consultation in 2016; it is noteworthy for having a higher density than existing London Plan Density Matrix and its scale (up to 24 storeys) is completely out of proportion with the existing low-rise Victorian residential areas that surround it.
107	2265	Residents Association	Mark Walker	TITRA	Housing	H7		TITRA objects to Policy H7 which does not recognise the social, health & safety problems that HMOs are causing in enclaves like the railway cottages, Wells House Road and the Wesley Estate; these behaviours are adversely affecting both the amenity and quality of life there. Existing and local authorities are already failing in their duties of licensing and taking enforcement measures against rogue HMOs when there is such a high number of these properties. TITRA is unhappy that Paragraph 8.6.3. discusses them if they are a theoretical issue which is wholly inadequate approach. It wants to see

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								extra policies, under Policy H7, that require the OPDC and local boroughs and landlords to: - Strengthen and properly resource the licensing of all such properties - Identify and properly monitor HMOs - Sign both landlords and tenants up to codes of practice on HMO controls and acceptable behaviour including proper waste collection and recycling, respectively - Properly fund enforcement of troublesome landlords and HMO sites in all affected boroughs.
107	2266	Residents Association	Mark Walker	TITRA	Housing	H7		TITRA is every concerned that the very large number of construction workers involved in HS2 and the area's redevelopment may need some new, more imaginative approaches to housing them. The railway cottages and the other residential enclaves already suffer from waste collection and antisocial behaviour issues from rapid growth in regulated and unregulated HMOs and other multiple-tenant private rented housing. TITRA wants to an additional policy under H7 section, that will see the OPDC create a mechanism for working closely with stakeholders such as HS2 and London & Regional – this approach will develop policies that contain construction personnel's accommodation to development sites as well as reducing HMOs' harmful impacts on existing residential areas.
109	2282	Local Resident	Lynette Hollender		Housing	H1		We believe that there is no justification for the number of homes indicated in the Local Plan: 24,000 new homes. The OPDC has provide no modelling based on different projections of housing numbers.
109	2283	Local Resident	Lynette Hollender		Housing	H1		We would ask for justification of any projections based on the growing population in respect of Brexit and the Government's commitment to reducing immigration. Indeed, Jonathan Portes, professor of economics at King's College London and former director of the National Institute of Economic and Social Research (NIESR), feels the population may even fall. He says: "They [population projections] depend on all sorts of factors which the ONS does not pretend to be able to forecast or model. My view is that I think EU migration will fall very significantly over the next couple of years, and migration overall will fall. Therefore, the population increase may be significantly slower than the ONS says."
109	2297	Local Resident	Lynette Hollender		Housing	H4		There are widespread concerns about lack of commitment to building affordable family homes, as OPDC seems committed to extending North Acton with plans for housing for transient renters and students. Justification is required as to how these transient populations will build a sustainable community. Monofunctional land uses are contrary to the overall spatial vision of the plan.
109	2298	Local Resident	Lynette Hollender		Housing	H2		There are also concerns that that affordable housing isn't actually affordable to people who most need it. We need information as to the income level required to be able to afford these homes, and justification for that decision.
109	2299	Local Resident	Lynette Hollender		Housing	H1		We ask why OPDC has lacked vision in exploring new concepts in housing such as re-zoning industrial areas to mixed use to enable local self-builds above existing businesses. (See GUA response.)
110	2507	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H1		This policy is not justified. The absorption rate of 700 market homes (not including affordable homes) per annum which informs this policy makes very ambitious assumptions that there will be numerous significant development sites delivering at any one time and that any market sales saturation effect from the combination of seven competing developers will not arise.
110	2508	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H2		The policy is not sound – it is not justified, it fails to meet objectively assessed need and is not positively prepared. There is inadequate evidence to justify delivery of 50% affordable housing as is made clear in para 8.18. The whole plan viability suggests a more likely general delivery of 35% affordable housing with fingers-crossed that some sites might deliver 50%. The competing demands on developers for necessary infrastructure cost simply add to the problem of this wishful thinking.
110	2509	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H2		The gap between assessed need and likely deliverability is extreme in terms of London Affordable Rent Homes. The SHMA assesses that 86% of the households identified as needing affordable homes that would need to be social rented. The policy sets at 30% (of the affordable homes) target to be London Affordable Rent (the substitute for social-rented homes). This would provide just 10.5% of homes delivered at Affordable Rent Homes (meeting less than a quarter of need) with a scenario of 35% affordable homes delivered. This would rise only to 15% (only a third of need) where 50% of homes are delivered.
110	2510	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H2		There is particular concern that to date (in terms of planning applications approved) delivery is only 22% affordable housing and just 5% London Affordable Rent. The London Affordable rent comprises 21% of the affordable housing. (Note that these figures include conventional and non-conventional homes as the OPDC would in monitoring delivery of housing targets – i.e. includes student rooms and Build to Rent is not included as affordable housing as set out in Policies H2 and H6). (OPDC NOTE: REFER TO TABLE IN RESPONSES)
110	2511	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H2		Given that it is assumed the OPDC area will meet a considerable level of the need identified within the SHMA (amounting to some 23% of the housing delivery of the housing market area's identified need) failures by the OPDC to deliver its proportionate level of London Affordable Rent homes will place a heavier weight on the boroughs to deliver these and could have negative impact. How the OPDC will co-operate with the boroughs to meet the objectively assessed need of the housing market area is also notably absent from policy H2.
110	2512	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H2		The policy compromises delivery of a mixed and balanced community in the OPDC area (required - para 50 NPPF). The cost of other 'affordable housing' will unlikely be affordable to households with below median incomes (that is the bottom half of households by income). The new population would then be predominantly from the top half of households (by income) not constituting a balanced mix of incomes.
110	2513	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H2		The SHMA identifies that only 7% of those assessed as needing affordable housing would be able to meet the cost of London Living Rent Homes. The GLA requires that households accessing London Living Rent homes must be 'middle income' earners that are already renting and able to put money away to meet the cost of buying or part buying a home at a later date. Thus, these would not be accessible to households on the boroughs' housing waiting list.
110	2514	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H2		Policy SP1 3.5, which notes levels of deprivation in areas outside but at the edge of the OPDC area and says 'it is important that Old Oak and Park Royal brings tangible benefit for [deprived] local communities' will also be compromised
110	2515	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H2		There is some fear that delivery of high levels of high cost market housing in the OPDC area will impact on rising property prices in neighbouring areas with the potential of displacing rather than meeting need of lower income households. In April 2017, The Telegraph reported that "This nook of north-west London [Harlesden] has seen the biggest growth in property prices in the capital in the past year at

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								14.6 per cent, according to research by Hamptons. That's more than double the London average of 6.1 per cent." Given that policy SP1 Catalyst for Growth c)ii & iii and paras 3.4 & 3.5: clearly assert that the regeneration of Old Oak and Park Royal will bring tangible benefits for local communities and offers life improving condition it is essential that the OPDC address the issue of potentially negative impact in terms of housing costs and affordability in neighbouring wards..
110	2516	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H2		Policy H2 table 8.2 description of London Living Rent is inadequate. This should also state that households must also already be renting and want to build up money to buy their home on a shared ownership basis.
110	2517	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H2		The description of London Affordable Rent (also table 8.2) should also be amended to say 'Capped' Target Rents set in accordance with government guidance and excluding service charges.
110	2518	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H3		The policy is unsound. It is not justified or positively prepared. It is disappointing that there has been such a scaling down of proposed target for family sized housing from 53% family sized housing in the affordable housing sector in reg 18 consultation to 25% (across the sectors) in the regulation 19 Local Plan. The SHMA suggests the need for 51% affordable family sized home; around a third of which would need to be 4-bedrooms+ and 64% family sized market homes. This creates an extremely wide gap between evidence and the proposal of meeting need. Failure to contribute to meeting a proportion of need identified in the housing market will create negative impacts outside the OPDC boundaries. This is of high concern given the levels of overcrowding identified in the SHMA – in 26.7% homes (84,227 in 2011) homes in the housing market area. Overcrowding has huge impact on health including links with TB, accidents in the home, mental health, respiratory and infectious diseases, educational development and difficulties for children in finding space to study, lack of privacy, anxiety and depression.
110	2519	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H3		The OPDC should set out how will co-operate with the three boroughs to meet the objectively assessed need for family-sized homes in order to reduce rather than increase existing levels of overcrowding.
110	2520	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H3		Given that the OPDC is principally creating a new area here, there are questions around what the future demographic may comprise and whether lifetime neighbourhoods will be created. Will there be sufficient family-sized homes for smaller households moving into the area to grow and stay here longer term? How will the composition of the area compare with surrounding areas? There is an evidence / data gap here as highlighted in the Integrated Impact Assessment.
110	2521	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H3		The OPDC must contribute proportionately to meeting the need identified in the housing market area of Brent, Ealing and Hammersmith and Fulham, or the result will be placing increased need on the boroughs. The SHMA and supporting text 8.32 of this policy suggest a need for a target for 51% for family sized affordable housing and 64% family sized market housing. The 25% target for family housing is much too low and will leave families already living in overcrowded homes to experience ever greater need. In Brent 30% of homes are overcrowded and the SHMA says that 27% of homes across the whole market area are overcrowded. We are particularly concerned about the need for larger family sized - four and five-bedroom homes. The SHMA shows that 16% of affordable housing should be four and five-bedroom homes. The London Assembly Housing and Planning Report 'Crowded Homes' of 2011, highlighted in sections 3.3 and 3.4 that while building a small one or two bedroom home will take one family out of temporary housing (impacting on two, three or four Londoners) , building a 6 bed home of an overcrowded family creates a down chain – that could solve the problem for 36 Londoners). https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Final%20overcrowding%20report%20-%20print%20version.pdf) Given that there are much greater levels of overcrowding for black and Asian households this also has an equalities impact.
110	2522	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H3		We suggest Policy H3 should include a target for four and five-bedroom sized homes.
110	2523	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H5		The policy is not effective. It needs to specify how exactly it will resist loss of existing housing. The policy should support retrofitting on new homes. It should also ensure that where a proposal would result in new housing that it re-provides an equal amount of space, rooms and tenure.
110	2524	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H6		The policy is not sound, it is not effective. Policy H6 (a) suggests that Build to Rent will provide affordable housing in the form of intermediate rental products. However, the London Mayor's Affordable Housing and Viability SPG says that this product will be delivered as discounted market rent (preferably at London Living Rent levels). Preferably does not mean necessarily. Is the OPDC saying that it will only approve developments that include Build to Rent schemes that are in the form of an intermediate rental product and that it would not approve applications for any that are above London Living Rent levels? If so, Policy H6 (a) should make this clearer – perhaps saying 'only in the form of affordable housing that are no higher than London Rent levels', or if not, it should make it clear that some Build to Rent schemes could be at higher than LLR levels.
110	2525	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H6		For the policy to be effective, the OPDC should set an annual target to measure/monitor delivery. This is important, because if this type of housing can be delivered by the private rented sector (without grant funding), potentially more money could be allocated to deliver Affordable Rent Homes (the nearest we have to social rents).
110	2526	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H6		We have grave concerns that the new Build to Let properties will not be available/affordable for local people and thus could increase rather than alleviate need. There must be delivery of sufficient Affordable Rent Homes to meet need to ensure that private renting is a tenure of choice. The rental cost of a two-bedroom London Living Rent home in College Park and Old Oak ward (comprising most of the development area) is £959 a month. A household would need an income of £34,524 (based on a third of income) to meet the cost. Median household incomes in that ward are just £30,890, and across Brent are £32,140. It is important for the Plan to show how the needs of households with below median income levels will be addressed within the housing market area.
110	2527	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H8		The policy is unsound, it is not positively prepared. Re H8 (a) the Bashley Road site needs to be protected but also needs significant improvements. There are serious drainage problems on the site and associated health and safety problems (including rats) and inadequate basic facilities. Residents suffer pollution including noise and

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								vibration from neighbouring industries sometimes also at night. The entrance to the site is a long and extremely poor-quality road with no paving (worse than other areas in Park Royal) and is poorly lit. Adults and children suffer poor health. Gypsies and Travellers anyway continue to experience some of the poorest health outcomes in our society, including the lowest life expectancy of any group in the UK (10% less than the general population) and high infant mortality rates. The OPDC could ensure that, at the very least in the instance of the Bashley Road site, that an evidence base - a full assessment of current conditions (including infrastructure) and proposal for improvements are produced and improvements delivered. This is an issue that also needs to be referred to in Strategic Policy SP3.
110	2528	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H10		The policy is not effective. It is unclear how 'vibrancy and diversity' H10a(i) is to be measured or monitored.
110	2529	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H10		To some, large areas of development of student accommodation and private housing such as that around North Acton is actually the creation of a transient community, consisting almost exclusively of one demographic – rather than a diverse lifetime neighbourhood.
110	2530	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H10		There is concern that this area particularly provides over concentration of student and single person dwellings to the exclusion of other forms of housing for which there is greater evidence of need. This also delivers types of supporting infrastructure, shops and services that don't meet wider needs. The area already accommodates 718 student bed spaces at 'The Costume Store' Victoria Road (former BBC costume store) 657 student bed spaces at NEC House, 1 Victoria Road. The Holbrook House application (approved in May 2017) is for 424 student bed spaces and Lyra Court 184 This is a total 1,933 – meeting 60% of the need across the housing market area (3200 identified in the SHMA) – of the three boroughs. This is an incredible contrast with the targets and intended delivery of London Affordable Rent or family sized homes. Other developments and recently approved applications have a predominance of one-bedroom flats – adding further to the already the creation of an area that is neither mixed or balanced. The development on the junction of Victoria and Chase Road is 151 residential units 55% of which are one-bedroom flats and only 2% with family sized accommodation. 6 Portal Way with 578 residential units includes 340 one-bedroom flats (59%) and only 5% family sized homes. (Total 432 one-bedroom flats and just 35 (5%) family sized homes). In consultation events on the regulation 18 Local Plan where residents expressed concerns about over concentration of student housing in North Acton officers said that they would ensure that communities are mixed and balanced and not dominated by one housing typology or tenure. Mention of discouraging student housing in North Acton was made. The current policy fails to protect against a mono-type of housing form developing in the area.
110	2531	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H10		In this respect, what has already been delivered in North Acton should be deemed contrary to policy set out in H10a (iii) and (iv). Again, it's not clear how the OPDC will measure and monitor undermining of conventional self-contained housing supply and 'overconcentration' in any one specific location
110	2532	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H10		The OPDC is responsible for catering for the needs of students along with the authorities in the housing market area, not those of any one university. We note the officers report relating to the Holbrooke House application (determined in August 2017) not meeting objectively assessed need assessed in the SHMA, but meeting a need identified by Imperial College - "The proposed student accommodation meets a need identified by Imperial College and ensures all first-year students attending the university will be provided with a college managed space".
110	2533	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H10		The policy should provide a map showing where there is existing student accommodation and where it may be appropriate to deliver any more (if meeting objectively assessed need) and where there is already overconcentration of student accommodation, where diversity of area threatened and it is therefore inappropriate to deliver any more.
110	2534	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H10		It should provide information of their co-operation with the boroughs in term of meeting objectively assessed need for student housing and what proportion of need the boroughs will provide, to prevent further overconcentration of student housing in the OPDC area and undermining of delivery of conventional self-contained housing supply.
110	2535	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H10		Additionally, the policy should require that student housing developments deliver the associated social and community infrastructure needed in order not to put additional stress on existing services (including health services).
110	2536	Community Group	Sharon Hayward	Grand Union Alliance	Housing	H10		It should ensure delivery of an appropriate quota of publicly accessible green and open spaces.
111	2658	Local Resident	Jeremy Aspinall		Housing	H1		We believe that there is no justification for the number of homes indicated in the Local Plan: 24,000 new homes. The OPDC has provide no modelling based on different projections of housing numbers.
111	2659	Local Resident	Jeremy Aspinall		Housing	H1		We would ask for justification of any projections based on the growing population in respect of Brexit and the Government's commitment to reducing immigration. Indeed, Jonathan Portes, professor of economics at King's College London and former director of the National Institute of Economic and Social Research (NIESR), feels the population may even fall. He says: "They [population projections] depend on all sorts of factors which the ONS does not pretend to be able to forecast or model. My view is that I think EU migration will fall very significantly over the next couple of years, and migration overall will fall. Therefore, the population increase may be significantly slower than the ONS says."
111	2673	Local Resident	Jeremy Aspinall		Housing	H4		There are widespread concerns about lack of commitment to building affordable family homes, as OPDC seems committed to extending North Acton with plans for housing for transient renters and students. Justification is required as to how these transient populations will build a sustainable community. Monofunctional land uses are contrary to the overall spatial vision of the plan.
111	2674	Local Resident	Jeremy Aspinall		Housing	H2		There are also concerns that that affordable housing isn't actually affordable to people who most need it. We need information as to the income level required to be able to afford these homes, and justification for that decision.
111	2675	Local Resident	Jeremy Aspinall		Housing	H1		We ask why OPDC has lacked vision in exploring new concepts in housing such as re-zoning industrial areas to mixed use to enable local self-builds above existing businesses. (See GUA response.)
113	2688	Local Resident	Thomas Dyton		Housing	H1		We believe that there is no justification for the number of homes indicated in the Local Plan: 24,000 new homes. The OPDC has provide no modelling based on different projections of housing numbers.

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113	2689	Local Resident	Thomas Dyton		Housing	H1		We would ask for justification of any projections based on the growing population in respect of Brexit and the Government's commitment to reducing immigration. Indeed, Jonathan Portes, professor of economics at King's College London and former director of the National Institute of Economic and Social Research (NIESR), feels the population may even fall. He says: "They [population projections] depend on all sorts of factors which the ONS does not pretend to be able to forecast or model. My view is that I think EU migration will fall very significantly over the next couple of years, and migration overall will fall. Therefore, the population increase may be significantly slower than the ONS says."
113	2703	Local Resident	Thomas Dyton		Housing	H4		There are widespread concerns about lack of commitment to building affordable family homes, as OPDC seems committed to extending North Acton with plans for housing for transient renters and students. Justification is required as to how these transient populations will build a sustainable community. Monofunctional land uses are contrary to the overall spatial vision of the plan.
113	2704	Local Resident	Thomas Dyton		Housing	H2		There are also concerns that that affordable housing isn't actually affordable to people who most need it. We need information as to the income level required to be able to afford these homes, and justification for that decision.
113	2705	Local Resident	Thomas Dyton		Housing	H1		We ask why OPDC has lacked vision in exploring new concepts in housing such as re-zoning industrial areas to mixed use to enable local self-builds above existing businesses. (See GUA response.)
114	2727	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Housing	H1		We question the Local Plan's strategy of delivering 24,000 homes in the development zone which comes as a target from the former Mayor's vision for the area. We can't see evidence that this target has been 'objectively assessed'. We believe this policy doesn't follow planning law, unless we see evidence that alternatives have been evaluated. We question this target given limited road infrastructure's inability to cope with such large-scale regeneration. We note that Planning policy 2, covering 'Old Oak North' (the Car Giant/London & Regional Properties site) has more realistic housing targets: that is because the landowner has sifted the evidence and reduced their target figure from 9,000 in its first proposals to 6,500 in its masterplan consultation.
114	2728	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Housing	H1		We think there is a real danger that, with Car Giant/London & Regional Properties scaling back the number of homes it wants to build, the OPDC is having to allow planning applications with excessive densities elsewhere, to deliver its 24,000 homes target. This is why Genesis Housing and QPR's Oaklands development was so quickly approved with a very basic public consultation in 2016. With it's higher density than existing Mayoral guidelines (up to 24 storeys) is completely out of scale with the existing residential communities surrounding it.
114	2759	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Housing	H7		TITRA is every concerned that the very large number of construction workers involved in HS2 and the area's redevelopment may need some new, more imaginative approaches to housing them. Our residential enclaves in the area already suffer from waste collection and antisocial behaviour issues from fast growth in regulated and unregulated HMOs and private rented housing. We want to see the OPDC working closely with stakeholders such as HS2 and London & Regional to develop policies that contain construction personnel's accommodation to development sites as well as reducing HMOs' harmful impacts on existing residential areas.
115	2768	Local Resident	Nye Jones		Housing	H1		TITRA questions the Local Plan's strategy of delivering 24,000 homes. This target comes from the former Mayor Johnson's vision for the area, not from objective assessment of whether this area's roads can cope with such large-scale regeneration. TITRA notes that 'Old Oak North' (the Car Giant/London & Regional Properties site) has done studies and cut its target from 9,000 to 6,500 in its master plan consultation.
115	2784	Local Resident	Nye Jones		Housing			TITRA is every concerned that the very large number of construction workers involved in HS2 and the area's redevelopment may need some new, more imaginative approaches to housing them. TITRA wants to see the OPDC working closely with stakeholders such as HS2 and London & Regional to develop policies that contain construction personnel's accommodation to development sites - as well as reducing HMOs' harmful impacts on existing residential areas.
120	2870	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Housing	H2		The Forum is concerned that only 30% of the affordable housing target of 50% should be at London Affordable Rent (LAR). The OPDC's own SHMA established an 86% need for LAR within the affordable housing requirement. LAR is the rent level that comes closest to providing a genuinely affordable rent level for low earning households. Incomes in Harlesden are markedly lower than London as a whole. A median household income for Harlesden ward of £27,030 in 2012/13 was only 84% of the Brent median (£32,140) and only 69% of the London median (£39,000). Median incomes placed Harlesden ward within the 10 most income deprived wards in London, out of over 628. The unambitious target for LAR does not go far enough in addressing the housing needs of those on low incomes in Harlesden and other local communities.
120	2871	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Housing	H2		It is also contended that the setting of a target of 30% affordable rent and 70% intermediate is not in accordance with Government policy set out in the National Planning Policy Framework (NPPF), nor is it in general conformity with the London Plan. The National Planning Policy Framework (NPPF) in paragraph 47 states that local planning authorities should "ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area". It also states in paragraph 50 that local authorities should "plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community". The OPDC's own SHMA established an 86% need for LAR within the affordable housing requirement. Policy 3.11 of the London Plan states that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale.
120	2872	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Housing	H2		Changes sought are the substitution of 30% by 60% and 70% by 40% in policy H2.

Employment

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
12	48	Statutory Consultee	Liz Goodwin OBE	LWARB	Employment			LWARB is supportive of the recognition within the Employment section that shared workspaces can save costs. LWARB would encourage strengthening the Employment section in terms of the ambition to create a clean tech hub and utilise existing businesses to identify new industrial symbiosis opportunities with planners and developers such as those referenced in the Circular Economy Study for Old Oak and Park Royal report. The Mayor of London included a commitment to seeing waste as an opportunity to create jobs in reuse, repair, remanufacturing and materials innovation in his Manifesto, and planning policies can help assist in delivering this commitment. We would therefore encourage the inclusion of reuse, repair and remanufacturing skills, opportunities and businesses within the Park Royal development area.
14	61	Agent	Leonie Oliva	Deloitte LLP (on behalf of Imperial College)	Employment	E2		In addition to supporting general education uses in the OPDC area, Imperial has a strong interest in the move towards the Future Employment Growth Sectors outlined in Policy E2, 'New Employment Floorspace'. With involvement in the life sciences, related technology and incubator industries, particular interest for the University exists with regard to the 'MedTech' sector. Imperial therefore supports efforts to champion these emerging industries and the positive contribution they will make to the prosperity of London, and welcomes their high profile in the draft Local Plan.
23	186	Local Authority	Cllr. Muhammed Butt	London Borough of Brent	Employment	E2		Brent Council believes this aspect of the Plan is unsound on the grounds it is not positively prepared, as policy E2 fails to set a quantum of affordable workspace to be provided as part of major employment developments. Brent supports the principle of policy E2, to secure low cost and or open workspace and studios where developments provide over 1,000sqm of new employment floorspace. Given that regeneration at Old Oak will result on the loss of industrial land and impact on existing space occupied by SMEs, seeking compensatory provision is to be welcomed. Evidence of the unmet demand for such workspace is well documented in both the OPDC and Brent Employment Land Demand Studies. Policy E2 states 'an appropriate proportion' of low cost and open workspace will be required. Brent is concerned without further defining what constitutes an appropriate proportion, workspace may not be secured. Supporting text in paragraph 9.22 states where provision cannot be made on site appropriate financial contributions will be sought to secure equivalent provision off site. Without an indication of what provision would be required on site, it is not clear how off site contributions will be calculated. It's not clear the extent to which affordable workspace has been taken account of in the viability study that supports the Local Plan. For the policy to be deliverable further clarity is needed. Change sought: A similar approach should be taken as with affordable housing, where a target is set for the proportion of low cost workspace to be provided, informed by the whole plan viability assessment. Brent would welcome further discussions as to how the Section 106 SPD will set out an approach to calculating off site contributions.
30	381	Local Authority	Steve Barton	London Borough of Ealing	Employment	E1 E2		Both of these policies are curiously reticent about intensification, although there is mention of it in the supporting wording. It would be helpful if there was an actual policy hook here to support schemes which deliver intensification and to acknowledge that flexibility will be needed to secure this without undermining the integrity and function of the SIL. While new London Plan policies are not available at this point the London Industrial Demand Study points clearly to the overriding need to secure industrial intensification on suitable sites.
30	382	Local Authority	Steve Barton	London Borough of Ealing	Employment	E3		This policy is currently unclear as to where an 'appropriate location' for low cost or open workspaces would be despite requiring this as a management criterion. Clarity would be welcomed particularly as to whether this is a SIL compliant uses.
30	383	Local Authority	Steve Barton	London Borough of Ealing	Employment	E4		The restrictive nature of this policy is supported. Poorly managed work-live development runs the risk of undermining the SIL. Ealing's experience with residentially-enabled intensification shows that this can most effectively be managed on an exceptions basis.
36	456	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Employment			The draft Local Plan proposes to de-designate a significant area (87 hectares) of Strategic Industrial Land to support the redevelopment of new homes and jobs as identified in Annex 1 of the London Plan. Whilst this runs generally contrary to London Plan policy 4.4, in this instance the release of SIL is accepted as an integral aspect of the Old Oak Common Opportunity Area and the development of a new neighbourhood based around the new public transport infrastructure that will be delivered at this location. The extent of the proposed release is broadly consistent with the identified potential pipeline in the GLA's Industrial Land Supply and Economy study (2016) and the GLA's Industrial Land Demand Study (2017). Much of this land is surplus railway infrastructure land.
36	457	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Employment	E1		There exist a number of industrial uses within the areas proposed for SIL de-designation. The Mayor would wish to be assured that capacity has been identified and satisfactory relocation arrangements put in place to accommodate any uses/businesses that would be affected. Sites within the OPDC area are a first preference (either as part of development proposals or within the retained SIL), or alternatively elsewhere within the boroughs of Hammersmith & Fulham (H&F), Ealing and Brent. A sequential approach along these lines has been adopted in Policy E1 b)ii) and is supported although it could be strengthened – see comments on draft policy E1 below.
36	460	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Employment	E1		To support the remaining SIL, draft policy E1 requires no net loss of industrial floorspace. This will be an important aspect of achieving the required increase in the number of jobs across Park Royal and Old Oak Common. To achieve no net loss of floorspace, alongside a significant loss of SIL will require an intensification of employment uses and floorspace on the remaining SIL sites. This means that the Local Plan must continue to protect the remaining SIL and promote the intensification of uses. Policy E1 achieves the protection element of this and the Park Royal Intensification Study, which is part of the Evidence Base for the Plan, provides a range of tools that should promote the intensification of those remaining SIL areas.
36	461	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Employment	E1	b.ii	Policy E1 b)ii) (page 229) which sets out a sequential approach to support the relocation of businesses affected by SIL de-designation should be strengthened. Applicants only need to demonstrate that suitable premises exist elsewhere, rather than ensure that satisfactory arrangements are put in place to support relocation. The risk with the current proposed wording is that all applicants might simply point to the same site leading to double counting of capacity to accommodate displaced businesses.

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41	529	Agent	Jack Savin-Taylor MRICS	DS2 (on behalf of Old Oak Park Limited)	Employment	E1 TO E5		Notwithstanding the absence of any commercial floorspace (as noted above), on the assumption that a revised AHVA did correctly include employment uses, then the Revised Local Plan sets out a number of Employment Policies (Policy E1-E5) which would adversely impact on the value of said floorspace. The requirements of Policies E1-E5 are covered within the DP9 representations, however in summary, those requirements which have a 'value' impact are as follows: • Re-provision of creative business floorspace, and such re-provision to be affordable; • Applicants must demonstrate robust engagement with affected businesses throughout pre- and formal application process. • The phasing of the scheme should also minimise business disruption, by providing permanent or meanwhile employment space (see Policy TCC9) for existing business units to move into before they are redeveloped • Provision of a Marketing Statement and evidence of engagement with potential occupiers • On schemes over 1,000 sq m, the provision of new creative floorspace, with space being offered at approved (i.e. low cost) rent levels As noted within the DP9 representations the requirements set out in the Revised Local Plan are unduly onerous and go beyond what the planning system should be used for. Whilst in isolation the impact of the various policy requirements is difficult to quantify when assessing notional sites, it is considered that the cumulative impact of these policies will place a strain on the ability of developers to deliver new employment floorspace at competitive market rates, and as a result impact on the overall viability of development proposals
41	530	Agent	Jack Savin-Taylor MRICS	DS2 (on behalf of Old Oak Park Limited)	Employment	E7		Under Policy EU7 the Revised Local Plan requires applicants to submit a Circular and Sharing Economy Statement, demonstrating the following: • How the proposed buildings can be disassembled and re-used at the end of their useful life; • Requirements of the Circular Statement to be promoted through leasing arrangements over disposal. • How sharing economies have been adopted in design and construction of the development, and ongoing operation. For example, in relation to water, energy, materials, flexible design etcAs DP9 note within their representations the requirements for information in relation to materials, supply chain, end users and even potential future owners is unduly onerous. For example, the requirement to prescribe certain materials which should be "low impact, renewable and easily recovered at the end of their life" at planning application stage will hinder the ability of developers to procure competitively priced construction contracts, ultimately increasing construction costs. The impacts of this policy have not been reflected within the AHVA and DS2's view is that if the employment policies were rigidly applied the result would be increased construction costs, and a corresponding reduction in viability. We request that Deloitte's third-party Cost Consultant, namely WT Partnership, are engaged further to consider whether the requirements set out in the Revised Local Plan are adequately reflected in the construction costs.
42	588	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Employment	E1, E2	9.11, also TCC5 and 10.46-47	Paragraph 9.11 requires the re-provision of creative business floorspace on site. Paragraph 9.18 goes on to reference Apex House, and also requires any re-provision to be affordable. Policy TCC5 and paragraph 10.46-47 then say developers should work with local artists and provide new artists space. Whilst we recognise and appreciate the ambitions behind these requirements, the Opportunity Area designation does signal a fundamental change to the nature of the area. This means that many existing businesses are unlikely to be compatible with the new vision for the area. In order to fund the significant amounts of infrastructure required to deliver the new homes and jobs targets, residential and commercial values will need to rise and developers funding the provision of infrastructure will need to be allowed to deliver new floorspace that achieves the step change in values necessary to fund this infrastructure. There is something of a tension between the numerous onerous policies within the Plan which seek to retain existing businesses and meanwhile businesses, and provide discounted space for new businesses, when the fundamental principle aim of the OPDC is to deliver a substantial element of new jobs as part of the area's transformation. Consequently, we are keen to ensure that the Local Plan does not overly constrain new employment opportunities by burdening developers with requirements which they would not face when developing outside the Opportunity Area. Remove or significantly reduce the requirements of tis policy.
42	589	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Employment	E1	9.12, 9.13, TCC9	9.12 states that "Applicants must demonstrate robust engagement with affected businesses throughout the pre- and formal application process, to ascertain whether existing business occupiers wish to occupy the newly created space. The phasing of the scheme should also minimise business disruption, by providing permanent or meanwhile employment space (see Policy TCC9) for existing business units to move into before they are redeveloped". 9.13 provides even more detail on the process that developers must go through in order to relocate existing tenants. This all amounts to very onerous requirements, particularly when the Plan provides the basis for a re-designation of the land from SIL to a mix of other uses. The details of relocating businesses to secure the area's redevelopment is a private commercial matter and should not form a requirement of the Local Plan. Requiring this amount of process and detail from applicants could stifle development of key sites and goes beyond the statutory obligations of a landlord to their leasehold tenants. We consider that these requirements should be removed or significantly reduced.
42	590	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Employment	E2	d)i)	Part d)i) of this policy requires the provision of a Marketing Statement and evidence of appropriate engagement with potential occupiers. We do not consider this to be appropriate or necessary. Commercial floorspace will be designed to be commercially attractive, and the planning system should not involve itself with the way in which developers inform the design of commercial premises. Where offices in particular are involved, pre-application discussions with potential occupiers are highly likely to be confidential in nature and as such it would not be appropriate to include this information in a planning application.
42	591	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Employment	?	?	We recognise the desire to provide for a range of different business types, and for commercial floorspace to be flexible to meet the needs of a range of occupier types. However, we do not think this should be too prescriptive and should be considered in relation to each development proposal that comes forward. Ultimately, any requirement to subsidise commercial floorspace through reduced rents carries a cost and needs to be factored into a viability assessment.
42	592	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Employment	E3	b), 9.25, 2.26	We do not consider it necessary for the OPDC to require at part b) its approval of workspace and studio providers. 9.26 goes further by requiring space to be at approved rents, with 9.25 saying that low cost space should be at capped rents and security of tenure within the Landlord and Tenant Act. We consider this to be too much detail for a Local Plan, and not a matter that should be controlled through the planning system.

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42	593	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Employment	E3	b), 9.25, 2.26	Again, the cost of any capped rents as a discount to market rents will need to be accounted for in any viability appraisal. Amend policy emphasis which is as currently drafted, overly prescriptive.
42	594	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Employment	E5	9.39	We are not clear on what is meant by using the word 'operation' at 9.39 in relation to section 106 training, employment and opportunities obligations. This has the potential to be very onerous if not clearly defined and limited through SPD.
43	620	Planning Consultant	Hannah Willcock	DP9 (on behalf of A40 Data Centre B.V)	Employment	E1	ii), 9.8	Policy E1 ii) outlines that new proposals for SIL uses should look to increase, or maintain employment densities. Supporting text in paragraph 9.8 states that "where intensification of industrial land is not possible or appropriate, as a minimum, development proposals should not result in a net loss of jobs and should make appropriate re-provision of industrial floorspace." As outlined previously within these representations, there is an opportunity to further increase employment densities on sites which have re- provided or optimised the SIL floorspace on the site, other non SIL uses, such as office (B1) or hotel (C1) could be provided on site (in addition to the SIL) which increase employment density in line with point ii).
43	621	Planning Consultant	Hannah Willcock	DP9 (on behalf of A40 Data Centre B.V)	Employment	E2		Policy E2 describes where new office floorspace will be supported, specifically referencing in town centre locations or where the requirements of the sequential test have been satisfied. As outlined within the Park Royal Intensification Study we recommend that within this policy, it is stated that within Strategic Industrial locations, "where site conditions do not allow for viable multi-storey B2/B8 industrial typologies, introducing B1 office uses on upper levels..." may be acceptable as this will help to maximise the capacity of sites, and create significant uplift in additional employment capacity.
47	713	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Employment	E5		We support the OPDC's ambition to maximises access to employment, skills training and preemployment support. (Policy E5). We would, however, welcome the recognition that such opportunities should be available to all those who live in the vicinity, and not merely to those who live within the ODPC boroughs. The policy refers to the "relevant boroughs" but does not appear to define what these are.
49	738	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Employment	E1		The OPDC's Local Plan envisages protecting, strengthening and intensifying activity within the Park Royal Industrial Estate, creating 10,000 new jobs by enabling the delivery of between 550,000 and 600,000 sqm of additional employment floorspace across the area. The analysis below (Intensification study extract) suggests that even taking the low end forecast of 5,100 jobs from the Park Royal core, combined with the projected 7,600 jobs on the Channel Gate site and the 10,000 new jobs target is within reach. We would suggest that alongside monitoring employment growth, growth in total GVA, GVA per worker and whether growth comes from sectors that particularly benefit from Park Royal as a location are also important indicators of success.
49	739	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Employment	E1		PRBG welcomes OPDC's aspirations to protect Park Royal for industrial use, while employment development in Old Oak will be focused on commercial office space. The Group also agrees with OPDC that intensification of the area will be necessary to tackle the lack of industrial land. However, the challenges linked to intensification of the estate such as transport, the organisation of the public realm, multiple site ownership and the provision of adequate yard space need to be addressed (see 'land use' below).
49	740	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Employment	E1		The impact of automation on employment (reduction in employment density and continued growth in STEM skills requirements) does not seem to be acknowledged in the Local Plan, nor the Future Growth Employment Study. Automation may reduce employment densities but increase productivity in some sectors; a good thing for London's economy as a whole.
55	814	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Employment			In further developing the draft Local Plan, SEGRO recommends that OPDC: 1. Develops a clearly defined spatial vision for the Park Royal SIL which proposes a bold approach to proactively planning for new industrial development. This should include actively promoting and facilitating industrial development required for decant purposes. 2. Fully reviews its role in successfully delivering on the utilities and infrastructure requirements needed to support the effective operation and growth of Park Royal businesses. 3. Reviews and develops its draft policy requirements for new commercial development (particularly in relation to proposed restrictions on new commercial leases) to ensure that policy incentivises rather than stifles new commercial development.
55	815	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Employment			Industrial Sector in London In February 2017, SEGRO launched its 'Keep London Working' report to highlight the importance of industrial land to London's economy and productivity, the structural changes the sector is experiencing and the challenges it faces with the excessive release of industrial land for high value uses, such as housing. Urban logistics, which involves the movement of goods and services across the City, is a key element of London's industrial sector and is critical to its productivity and economic success. With 1500 occupiers, Park Royal is at the forefront of this growing sector. The report emphasises the importance of having an effective industrial and urban logistics sector in London, and identifies some of the key factors influencing this. These key influences are summarised below. Population growth London is a thriving and growing city which is forecast to grow from approximately 8.7 million in 2015 to over 10 million by 2031. As the number of businesses and consumers in the Capital continue to grow, the demands placed on industrial occupiers to get their goods and services to their customers naturally increases. This population growth will be particularly apparent in the OPDC area which is expected to deliver over 22,350 new homes as well as 67,900 new jobs within the next two decades. Growth in e-commerce As a result of the boom of e-commerce, the industrial sector is undergoing one of the most significant structural changes in recent decades. This demand is not just driven by population growth but also the application of technology that is changing consumer buying habits. Today, the UK already has the largest e-commerce sector in Europe. Estimated to be equivalent to £60 billion and 17% of total retail trade in 2016. This sector grew by 16% in 2015 and is projected to continue growing as the country becomes more digitally enabled. 'Last mile' service

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
								With the growth of e-commerce, retailers and their delivery partners need to reconfigure their supply chain, and new residential development will increase the need for rapid delivery for the 'last mile' service. This only heightens the importance of siting commercial development 'amongst' or 'near to' residential development on accessible locations in London. The OPDC area is expected to accommodate a significant amount of residential development over the coming years, meaning the demand for last mile service will increase. Change of use From 2010-2015 a total of 528 ha (or 7.1%) of London's industrial land was released to non-industrial uses, such as housing. This is equivalent to 106ha/year, and is around three times greater than the GLA's release target of 37ha/year. Therefore, whilst the demands and pressures on industrial land and the 'urban logistics' sector are increasing, the stock of industrial land is shrinking under pressure from alternative higher value uses. Jobs A minimum of 6,105 businesses and 76,200 employees are classified as being in the logistics sector in London. This figure does not include the substantial numbers of employees and businesses who operate in a logistics environment but which are classified within another sector, such as retail. This would include the likes of Ocado, John Lewis, Amazon and ASOS who operate sophisticated supply chains to a range of customers. Jobs in the logistics sector are increasing, with a growth of 6,800 (9.8%) between 2011 and 2014. Salaries, £38,585 per annum on average, are above the national average for all sectors (£27,607), and the proportion of full-time positions (85.3%) is also higher than the London average (73.8%). Industrial land is an increasingly important resource in the Capital, and if there is insufficient land located in the right locations, then London's urban logistics sector will be compromised at a cost to consumers, employees, businesses and the economy. Our response to the Revised Draft Local Plan for Old Oak and Park Royal is made in this context.
55	824	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Employment	P4, P5		Industrial intensification in Park Royal is a challenging and complex prospect, and this is acknowledged within the Park Royal Intensification Study (2017), which is the Local Plan evidence base for policies relating to new industrial development in Park Royal. The study concludes that despite significant occupier and investor demand for additional industrial space in the area, intensification is currently not happening. Potential reasons for this are identified in the study and include: - a lack of sites; - the additional management risks brought about by intensification; and - the difficulty of decanting existing businesses. To overcome some of the challenges associated with intensification, the study makes a number of policy recommendations for OPDC which include: - Facilitating collaboration and joint ventures between developers, occupiers and workspace providers. - Investigating how OPDC and private developers could create space for decant of businesses within or near Park Royal to enable comprehensive redevelopment of sites. - Supporting the delivery of an exemplar development which would trigger further developments. Draft policies P4 and P5 however do not include any explicit reference to these recommendations, and do not propose any positive measures to help resolve decant issues and land assembly limitations. As currently drafted, the Policies provide broad support for the principle of intensification, but do not seek to address the existing constraints on developers being able to achieve this, nor do they proactively plan for new industrial development through the allocation of sites and/or the preparation of a clear spatial strategy. In this respect, SEGRO considers that the draft Policies which relate to the Park Royal generally seek to provide a framework for new development proposals to be managed, largely in a 'business as usual' manner, rather than providing a clear spatial strategy which is intended to drive the delivery of new development. The fact that of the 28 sites allocated within the 'Places' chapter, 0 sites are located within the SIL is evidence of this. If the OPDC's core objectives for Park Royal are to be achieved, SEGRO believes that it will be necessary for OPDC to take a bold and active role in facilitating the development of new, modern and intensified industrial space, by identifying and allocating new sites for industrial development, and/or by assisting in the land assembly process to ensure such sites are available. OPDC should also consider the potential opportunities and benefits of working collaboratively with developers such as SEGRO as part of a partnership arrangement. Such arrangements can facilitate the delivery of substantial development schemes, for example is in East London the Mayor of London and SEGRO have worked in partnership to plan and deliver 1.4 million sq ft of modern industrial space across Newham, Barking & Dagenham and Havering
55	832	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Employment	E1	a)	Part a) of draft Policy E1 states that OPDC will protect the functioning, attractiveness and competitiveness of the Strategic Industrial Location (SIL), and its ability to support employment and economic functions. SEGRO supports this approach to development within the Park Royal SIL. The supporting text to this Policy states that "the evidence of an accelerated loss of industrial land means that the remaining stock of industrial land must be used as intensively as possible". This statement reflects the findings of SEGRO's Keep London Working report, but careful consideration needs to be given to occupier needs and their operational requirements. As a result of the operational requirements from urban logistic and e-commerce, SEGRO has delivered schemes with a plot density of 45% for customers such as Ocado and John Lewis. In SEGRO's experience, plot densities are reducing as the modern day urban logistics/ecommerce customers require circulation space (larger yards) to accommodate HGV vehicles as well vans to effectively operate shift patterns.
55	833	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Employment	E1	b)	Part b) of the Policy relates to employment outside the SIL designation, and states that proposals should support the retention of employment by retaining/reproviding existing employment uses within suitable on-site premises where they are compatible, and supporting the relocation of those which are incompatible with the land use policy and/or other planning policies applying to the area. Further to this, the supporting text states "to minimise business disruption, applicants should consider workspace offsetting, where applicants work with other landowners (as part of intensification partnerships), to invest in their site and intensify its use so that there is no overall loss of employment floorspace. Applicants should also consider options for a single permanent move off-site or a temporary/meanwhile onsite

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
								solution and then permanent provision elsewhere” (p231). Within the draft Plan, both the Victoria Industrial Estate and the Westway Estate are located outside of the SIL area and are allocated for housing-led redevelopment. If such proposals are to be delivered, for business decant purposes it will be important for SEGRO to have access to new sites which are appropriate for new industrial development. These two sites are currently home to around 50 successful businesses ranging from SMEs to large occupiers, which provide a range of goods and services in the food, TV and media and automotive sector. These are important businesses which align with the ‘future employment growth sectors’ set out within the Plan, and so the Plan should seek to ensure that they can be appropriately relocated within OPDC area. As set out in relation to the Policies set out in the ‘Places’ chapter, SEGRO requests that OPDC considers its role in the decant/redevelopment process, and engrains this within the Local Plan to ensure that there is sufficient support within the Plan to facilitate the delivery of the site allocation objectives for the estates (draft Policies P7 and P8), whilst also fulfilling the objectives of Policy E1 to protect existing economic and employment functions. More generally, we do not consider the requirements of part b) to be entirely clear, and so SEGRO would like to discuss this matter further with ODPC ahead of the next stage of the Local Plan process to ensure this policy is both clear and appropriate.
55	834	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Employment	E1	c)	Finally, part c) of the Policy states that “Development adjacent to SIL will only permitted if applicants can demonstrate that proposals will not materially affect the ongoing functioning of existing employment activities”. SEGRO supports this approach.
55	835	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Employment	E2	b)	Part b) of the draft Policy states that “proposals for new industrial floorspace will be supported within SIL and in other appropriate locations identified in the Place policies”. The supporting text also notes that this can be achieved through a number of means, including by horizontal and vertical extensions (p232). As demonstrated by the ‘Keep London Working’ report, there is a need for new industrial space, and this need is expected to grow in the future for the reasons explained above. As such, SEGRO strongly endorses OPDC support for new industrial floorspace, but this needs to be grounded in the needs of the market and subject to viability.
55	836	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Employment	E2	d)	It is clear from draft Policies SP5 and E2 that the intensification of Park Royal is a key objective of the Plan. It is also acknowledged within the Park Royal Intensification Study (2017) that industrial intensification to date has been limited by a combination of constraining factors, such as the cost and complexity of tenant decant, and the risk of developing intensified space with more complex management requirements. Other constraints recognised by the sector for new urban logistics multi-storey developments include a minimum land requirement of 3 acres, the necessity of securing pre-lets and market perception due to the untested nature in the UK of such innovative industrial models. With these existing difficulties in mind, to encourage the much-needed development of new industrial floorspace in an effective way, it will be necessary for any new policies relating to industrial intensification to be sufficiently flexible to incentivise rather than discourage it. Part d) of draft Policy E2 requires major new commercial developments to, amongst other things: - provide a range of cost, size and tenure arrangements - deliver an appropriate proportion of the total new employment floorspace in line with policy E3 a)-c) or provide a financial contribution towards low cost and/or open workspaces and studios, subject to viability Contrary to the overall objectives of Policies SP5 and E2, these requirements are unlikely to incentivise the already challenging prospect of intensifying existing industrial sites. Further commentary on these matters is set out below in relation to draft Policy E3 which focusses on supporting small businesses.
55	837	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Employment	E2		With regard to mixed-use development in OPDC, the supporting text within the draft Policy states: “the delivery of high density residential neighbourhoods with, and alongside, commercial development can be particularly challenging due to the range of uses involved. Applicants will be required to demonstrate that this challenge has been sensitively overcome, by ensuring that the design quality and mix of uses within the site are compatible and that the proposals responds appropriately to protect the amenity of other nearby occupiers in neighbouring developments. Examples of ideal design specifications for different types of employment spaces have been studied and could provide a useful point of reference for applicants” (p233). The relationship between commercial and residential uses in new developments is critically important to ensuring that both uses function as successfully as possible, without one unduly compromising the other. This balance is particularly important to SEGRO, as the business is currently exploring opportunities for the co-location of residential and industrial uses as, in the right locations, such a concept has the potential to deliver on strategic objectives for both industry and housing. In partnership with Barratt London, SEGRO has already submitted a planning application for the regeneration of the former Nestle factory in Hayes that deliver up to 1400 residential units, 230,000 sq. ft. of modern industrial space and an array of community and amenity space. This approach is supported at the strategic level. The Mayor’s ‘A City for all Londoners’ document states the following in relation to mixed-use innovation: “While recognising the need to promote economic growth, I know that the economy is changing and that we must use land intelligently – particularly in the context of a housing crisis that threatens the competitiveness of the city.... it may be feasible for housing and industrial activity to co-exist in certain locations. We need to be creative in how we think about space and promote mixed-use activity” (p22). Given the importance of delivering mixed use development successfully, SEGRO suggests that, rather than being addressed within the supporting text, the topic is included as an addition to Policy E2, or in the form of a new Policy. SEGRO’s suggested wording for the Policy is as follows: “Where new mixed-use development which incorporates housing is proposed, applicants will be required to demonstrate that the design quality and mix of uses within the site are compatible, and that the proposals responds appropriately to protect the amenity of residents and occupiers. OPDC will support innovative mixed-use developments which include both housing and industrial floorspace where the above can be demonstrated.”
55	838	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Employment	E2, E3		Draft Policy E3 states the following: “New low cost and/or open workspaces, including artist studios, will be supported where they: a) are of a satisfactory quality, appropriately located, well designed, readily available and adaptable to meet changing business needs, particularly for the identified employment growth sectors in Figure 9.3;

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
								b) are managed by an OPDC approved workspace or studio provider and supported by an approved Management Scheme; c) demonstrate that they are suitable for supporting micro and small businesses, having regard to ensuring appropriate: i) size and type of workspace; ii) provision for start-up businesses including a proportion of discounted rental terms and/or onsite business support services, taking into account the most up to date information on rent and service charge levels; and iii) security of tenure". Statements from the supporting text (p234) include: - Low cost workspaces provided at sub-market levels will be required - The rents offered to the workspace/studio providers will need to be capped and agreements should offer security in terms of length of tenancy - A minimum of 10 years lease period will be used as a guideline - OPDC will approve the workspace or studio provider where they meet required criteria - Provision of low cost workspace should normally go beyond "shell and core" and include basic fittings - The specification should be discussed and agreed by the intended occupier or workspace/studio provider and will be secured via a legal agreement SEGRO currently provides for a range of unit types and sizes across its 55 industrial estates in London, which include small units of 500 sq. ft. up to 150,000 sq. ft. SEGRO's customer base includes a range of users, from SMEs to large corporates and has extensive experience of creating modern industrial space that meet the needs of the market. However, the requirements set out under draft Policies E2 and E3 in relation to lease arrangements are highly concerning. For instance, SEGRO does not consider it appropriate for OPDC to control the details of the lease terms, including duration, through the planning process. SEGRO is also especially concerned by the requirement to provide affordable workspace, and to hand the management of this space over to a specialist provider. This is not, as far as we can see, an extensively tried and tested model, and the detail of how this could work is currently very limited within the Plan. Without more detail from OPDC on these matters, SEGRO would like to put forward a holding objection to the requirements for new employment space as set out by draft Policies E2 (c) E2 (d) and E3.
56	930	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Employment	E1	b)ii)	the Council recognises that this area will be subject to major change, however, any employment should be retained within the OPDC area or within the boroughs. The Council is keen to ensure that existing employment opportunities are not lost to wider London. Therefore, we would consider that 'wider West London area' would be more appropriate.
56	931	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Employment	E1	c)	c)Insert 'be': 'Development adjacent to SIL will only be permitted...'
56	932	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Employment	E2		LBHF supports providing for a range of workspaces in terms of cost, size and tenure arrangements. LBHF has adopted a similar approach in terms of affordable workspace. This policy should also include reference to new employment space being designed to be flexible so that any development can be responsive to changing needs.
56	933	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Employment	E5		LBHF supports this policy and seeks to work with OPDC to deliver this. The Council is keen to support opportunities for local residents and to be involved in the delivery of the Local Labour, Skills and Employment Strategy.
68	1055	Community Group	Martin Cain	Friary Park Preservation Group	Employment	E1		The lack of detail on protecting existing economic and employment functions makes this narrative unsound.
68	1056	Community Group	Martin Cain	Friary Park Preservation Group	Employment	E3		The lack of detail on who will provide support small businesses makes this narrative unsound.
70	1099	Local Resident	Joanna Betts		Employment	E1		Local residents have a desire to encourage creative businesses, artists studios and independent retailers to ensure that the area retains and enhances its personality. Here, a stronger commitment to the reprovisioning of affordable studio and office space is required, through monitoring and expecting developers to offer information about tenants and existing uses, to ensure reprovision can be enabled. Please see GUA response for detail.
71	1120	Local Business	Ben Eastop	ACAVA	Employment	E2	c.ii	We fully recognise and support the provision of new workspace for the cultural industries and artist studios sector as important contributors to future employment growth. 9.18 Likewise, we fully support the view that creative and cultural industries and artists are a distinct part of this future growth, and are often pioneers in it. We welcome the commitment to support the provision of new artist studio space and low-cost and/or open workspace. However, the level of this provision isn't specified, so would propose adding the phrase 'a significant proportion' of this type of provision within the overall workspace provision.
71	1121	Local Business	Ben Eastop	ACAVA	Employment	E3	9.24	9.24 We fully support the need for provision of low cost and/or open workspace for small businesses including creative/artists spaces and makerspaces and accompanying shared facilities and circular economy through efficient use of resources. However, we believe there needs to be a more precise way of defining 'low cost' or 'sub-market'. Without this, creative businesses and artists may be disbarred for economic reasons: 80% of market rent is still unaffordable for most artists and small creative businesses (for whom affordable is in the region of Â£10 - Â£16 psf per annum).

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71	1122	Local Business	Ben Eastop	ACAVA	Employment	E3	9.25	9.25 We welcome the recognition of the need for long term sustainability and security of tenure with a proposed minimum 10 year lease arrangement. However, we would like to see proposals for how this will be enforced over the long term so that affordable creative workspace provision doesn't revert quickly to commercial levels, forcing out artists and creative workers who can't afford to stay.
71	1123	Local Business	Ben Eastop	ACAVA	Employment	E4	9.29	We believe there is a growing demand for work-live spaces in London as artists and creative workers increasingly find it hard to meet high levels of housing and workspace costs. We therefore fully support this policy and note that it is in line with the Mayor's proposed Creative Enterprise Zones.
81	1227	Community Group	Chloe Fremantle	ArtWest	Employment	E1	b)i)	ArtWest support this clause and hope they can be included within it.
81	1237	Community Group	Chloe Fremantle	ArtWest	Employment	E4		ArtWest would like to support the OPDC on the idea of Live-Work spaces & we know that such spaces can function extremely well as both Acme and Acava run some successful examples.
83	1281	Local Resident	Nadia Samara		Employment	E1		Local residents have a desire to encourage creative businesses, artists studios and independent retailers to ensure that the area retains and enhances its personality. Here, a stronger commitment to the reprovisioning of affordable studio and office space is required, through monitoring and expecting developers to offer information about tenants and existing uses, to ensure reprovision can be enabled. Please see GUA response for detail.
84	1308	Local Resident	Nicholas Kasic		Employment	E1		Local residents have a desire to encourage creative businesses, artists studios and independent retailers to ensure that the area retains and enhances its personality. Here, a stronger commitment to the reprovisioning of affordable studio and office space is required, through monitoring and expecting developers to offer information about tenants and existing uses, to ensure reprovision can be enabled. Please see GUA response for detail.
85	1335	Local Resident	Francis, Marc and Caroline Sauzier		Employment	E1		Local residents have a desire to encourage creative businesses, artists studios and independent retailers to ensure that the area retains and enhances its personality. Here, a stronger commitment to the reprovisioning of affordable studio and office space is required, through monitoring and expecting developers to offer information about tenants and existing uses, to ensure reprovision can be enabled. Please see GUA response for detail.
87	1382	Local Resident	Patrick Munroe		Employment	E1		Local residents have a desire to encourage creative businesses, artists studios and independent retailers to ensure that the area retains and enhances its personality. Here, a stronger commitment to the reprovisioning of affordable studio and office space is required, through monitoring and expecting developers to offer information about tenants and existing uses, to ensure reprovision can be enabled. Please see GUA response for detail.
88	1409	Local Resident	Lily Gray		Employment	E1		Local residents have a desire to encourage creative businesses, artists studios and independent retailers to ensure that the area retains and enhances its personality. Here, a stronger commitment to the reprovisioning of affordable studio and office space is required, through monitoring and expecting developers to offer information about tenants and existing uses, to ensure reprovision can be enabled. Please see GUA response for detail.
92	1524	Community Group	Tom Ryland	Hammersmith Society	Employment	E2		No adequate explanation is given here or under Section 9 Employment, how these jobs will be created, and who will be the providers.
92	1526	Community Group	Tom Ryland	Hammersmith Society	Employment	E3		We are pleased that OPDC recognizes the need to provide a range of workspaces, especially start ups and smaller units. A challenge will be to provide these at affordable cost and rents.
92	1675	Community Group	Tom Ryland	Hammersmith Society	Employment	E1		She also pointed out that the classification of Park Royal as 'Strategic Industrial Land' was a misnomer as there is a whole range of employment uses ranging from offices to industrial, catering to small craft businesses
92	1676	Community Group	Tom Ryland	Hammersmith Society	Employment	E1		We suggest a reclassification to 'Strategic Commercial Land'. Within this use class, there should be flexibility to allow for facilities such as retail, gyms etc. to support the commercial uses.
92	1677	Community Group	Tom Ryland	Hammersmith Society	Employment	E1	E2	E1: Protecting Existing Economic and Employment Functions and E2: New Employment Floorspace. We support the principles set out in both of the policies and supporting text.
92	1678	Community Group	Tom Ryland	Hammersmith Society	Employment	E3		We recognize that it is difficult to accurately predict the future employment pattern in the OPDC area. However, in the longer term we do see that demand for office space in such a centrally connected location could dramatically increase which would have an effect on property and rental values which could have an adverse effect on established businesses and workspaces. In the meantime, the Policies should include provision for open workspaces, micro workspaces and artists' workspaces (Eg. As envisaged in para. 9.18). We share many of the local groups' enthusiasm for this type of provision. These are often best provided as part of conversions of existing building rather than new build as low cost/low rent is usually an essential ingredient. For various reasons, west London has a particularly poor track record of such provision compared to east London.
92	1679	Community Group	Tom Ryland	Hammersmith Society	Employment			Existing businesses should be supported and emphasis given to providing opportunities to young people, start-ups and training.
92	1680	Community Group	Tom Ryland	Hammersmith Society	Employment	E1		During the development stage, particular care is going to be required to avoid the displacement of existing businesses.
92	1681	Community Group	Tom Ryland	Hammersmith Society	Employment	E3	E4	We endorse the policies in the Plan promoting creative workspaces and E3 Supporting small businesses generally, and E4 Work - Live units.
92	1682	Community Group	Tom Ryland	Hammersmith Society	Employment	E5		Policy E5 : Local Access to Training, Employment and Economic Opportunities. We fully support the strategy behind this policy which must be encouraged to the full if the employment targets are to be achieved and sustained in the community.
93	1757	Residents Association		Wells House Road Residents Association	Employment	E1		Local residents have a desire to encourage creative businesses, artists studios and independent retailers to ensure that the area retains and enhances its personality. Here, a stronger commitment to the reprovisioning of affordable studio and office space is required, through monitoring and expecting developers to offer information about tenants and existing uses, to ensure reprovision can be enabled. Please see GUA response for detail.

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97	1838	Local Resident	Ralph Scully		Employment	E1		Local residents have a desire to encourage creative businesses, artists studios and independent retailers to ensure that the area retains and enhances its personality. Here, a stronger commitment to the reprovisioning of affordable studio and office space is required, through monitoring and expecting developers to offer information about tenants and existing uses, to ensure reprovision can be enabled. Please see GUA response for detail.
100	1907	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Employment	E1	E2	The requirements of the complementary and more detailed employment policy E1a) ii and iii seek to ensure employment densities are maintained with no let loss of industrial floorspace. We support these parts of the policy but not E1a) i) which requires that all development proposals are comprised of SIL compliant broad industrial type uses. We see this as over-restrictive and not justified for a 2018-38 Local Plan in an era of rapidly changing work practices. In particular we see scope for some mixed use in the Old Park Royal 'Place' (see paragraph 14 below).
100	1996	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Employment	E1		As set out above we consider Policy E1 to be unsound, not justified nor positively prepared. It is overly prescriptive in relation to the exclusion of any mixed development on SIL land, even where developments come forward which would maintain existing levels of employment floorspace. It is unsuited to the transition area between Old Oak South and Park Royal West, and fails to reflect changing patterns of work and home.
100	1997	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Employment	E4		We strongly support the provision of Work Live Units (Policy E4) and see this as having a close relationship with Policy TCC9 on Meanwhile Uses. The current draft policy E4 is over-cautious in requiring any such developments to be outside of SIL (Policy E4b). Given the scale of development planned at Old Oak, and the huge uncertainties of the commercial and housing markets in London in a post Brexit era, the scope for meanwhile uses is likely to be extensive. Such uses may prove to be much longer-term than anticipated.
102	2030	Community Group	Jacky Peacock	Harlesden Lets	Employment	E5		The jobs being created should encourage local people to become skilled and trained in order to become employed in the development but also to thrive because of it.
102	2035	Community Group	Jacky Peacock	Harlesden Lets	Employment	E3		Harlesden Lets welcomes the proposed delivery of small-business space and appreciates that supply of this in the area is limited. However, it is also hoped that reasonable rents, leases and business rates will allow new, small businesses to get a foothold and begin to thrive rather than see overpriced units remain empty for prolonged periods.
106	2212	Local Resident	Catherine Sookha		Employment	E1		Local residents have a desire to encourage creative businesses, artists studios and independent retailers to ensure that the area retains and enhances its personality. Here, a stronger commitment to the reprovisioning of affordable studio and office space is required, through monitoring and expecting developers to offer information about tenants and existing uses, to ensure reprovision can be enabled. Please see GUA response for detail.
109	2301	Local Resident	Lynette Hollender		Employment	E1		Local residents have a desire to encourage creative businesses, artists studios and independent retailers to ensure that the area retains and enhances its personality. Here, a stronger commitment to the reprovisioning of affordable studio and office space is required, through monitoring and expecting developers to offer information about tenants and existing uses, to ensure reprovision can be enabled. Please see GUA response for detail.
110	2537	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E1	Introduc tion	This Chapter is not sound as the evidence base is inaccurately used: Paragraph 9.2 indicates an assumption that an additional 67,900 jobs will be delivered, when in fact these are only "new" jobs and do not reflect the significant job losses anticipated in the Industrial Land Review. The development proposed in this plan will destroy or displace existing jobs, and thus only generate a net contribution of 49,052 in Old Oak area and 4216 net jobs in the Park Royal area. In addition, the Industrial Land Review indicates that there is limited demand for intensification in Park Royal (see paragraphs 5.35, 5.57), bringing into question the realism of the stated targets. GUA raised this loss of jobs consequent upon the development of the OPDC area as an issue in response to the regulation 18 Local Plan consultation
110	2538	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E1		1. Business and job losses are of grave concern to local residents and firms. This policy does not take into account who job and firm losses will impact most. Evidence suggests this will have a disproportionate impact on the local population, who are acknowledged to be living in amongst the most deprived wards in the three OPDC boroughs. This evidence has not been considered in this policy The evidence from the Industrial Land Review (Supporting Document 25.) shows that the largest proportion of the workforce in the OPDC area lives locally (p. 35; 3.30). Local people will be disproportionately disadvantaged by the closure, loss and potential relocation of existing local businesses and accompanying job losses. This has a material impact on Policies SP2 to SP5, as impacts on health, "good growth", thriving communities and resilience are significantly undermined by this. The Socio-Economic Baseline Study also highlights that local residents in and around the OPDC area are disproportionately from poor and of minority ethnic backgrounds. The IIA (Appendix D table 7) has noted the protection of jobs and businesses to be important in terms of impacts on local residents which are of concern in relation to some key aspects of the impact assessment. Evidence from the Industrial Land Review (3.30) highlights that while the OPDC area workforce lives across London, the largest proportion of workers are local and live within the three surrounding boroughs. Other industrial areas in London also provide local employment. While there are a large number of people who live across west London and drive to work in the OPDC area, those living locally or further afield will tend to take public transport and other modes of travel to get work. This may be due to weak north-south public transport links in west London as well as the lack of 24-hour public transport operation. The close work-home relationships which exist in Old Oak firms contributes to a sustainable and efficient set of economic clusters in the area, as well as a sustainable urban form – a key ambition of the Mayor's London Plan (Policy 6.1A(a)). Evidence of this is not referred to in the Plan Local residents will not only face rising rents as a result of the development of Old Oak, but potentially also longer and more costly commutes and increasing worklessness if jobs are lost as a result of business displacement. The potential for structural mismatches in skills required between jobs being lost and those being made available through construction or new office and retail jobs is high. There is a total of 5948 jobs threatened in the Old Oak area

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110	2539	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E1		2. The potential dis-benefit of displacing thriving and locally dependent businesses is not acknowledged. Stated ambitions to support relocation out of the area are potentially damaging to a significant proportion of the existing OPDC economy (some 23% of businesses). Relevant data on jobs and businesses, employment sectors and their distributions in the OPDC area contained in the ILR and other supporting documents should be included in the Employment Section Chapter 9 of the Local Plan for reference and as evidence to evaluate whether there is a sound basis for the proposed policies. Currently important evidence is omitted from the plan, suggesting a highly selective reading of the submitted evidence base in favour of a certain set of claims regarding job creation; there is a lack of information about the negative impacts of the development on job losses, dislocation, business closures and relocation, and the limited market scope for plans for intensification in Park Royal, and the potential for job expansion there is not discussed. These absences are not a strong recommendation for passing a test of soundness for the policies on employment. The evidence in the sections above is relevant to all policies in the Employment Chapter.
110	2540	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E1		3. GUA in response to the regulation 18 Local Plan consultation highlighted comments that are still relevant – - There is insufficient discussion of strategically building on the existing firms and jobs in the Old Oak area, and how to approach the disruption (already as a result of developer pressure and intimidation) and possibly relocation which they face as a result of the development. - Many firms are deeply enmeshed in local services and provisioning (of other firms, of local councils, social services and health care) as well as servicing other firms and activities across the city. The proposal for mixed use provision in Old Oak is supported, but appropriate strategic emphasis in achieving this needs to be given to supporting and strengthening existing firms and activities (including cultural and making activities) and to retaining the kinds of physical spaces on which they depend. A charter needs to be put forward to ensure that businesses who wish to remain in the area may do so, including opportunities to continue to own their own properties. Existing clusters and areas of strength need to be identified and supported.
110	2541	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E1		Alongside numerous successful and locally dependent small firms, the Old Oak and Park Royal areas have significant clusters of artists and makers, notably at Hythe Road. These can form the kernel of a dynamic cultural core to the new developments. Affordable space for artists is under great pressure in London, and the bespoke facilities, abutting the existing rail line north of Hythe Road, could be incorporated as part of the mixed-use strategy (notably point 8.16, which highlights the potential role of such spaces adjacent to the existing and future infrastructure).
110	2542	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E1		4. The policy does not have implementable plans to realise its goals. We suggest • Deletion of E1 (b) (ii) text – ‘within the rest of London and beyond’. This is considered in the ILR as potentially greatly disadvantageous to firms and most especially to their employees, none of whom currently live outside of London (p79 and p35) • OPDC should carry out detailed mapping of existing businesses and jobs in the Old Oak area in order to be able to monitor any relocation displacement. It should also maintain an updated public record of available places for relocation and meanwhile uses in the OPDC area and surrounding boroughs. This would form an important part of monitoring benefit or dis-benefit to existing communities.
110	2543	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E1		• New policy wording is needed in order to ensure the policy is effective and addresses issues of affordability. We propose: E1 (b) (iv) providing evidence of (which will be part of planning conditions) - robust engagement with affected businesses through pre and formal application processes to ascertain whether businesses wish to occupy newly creates spaces; - support provided to sustain existing businesses and social enterprises in transition to new land uses - effective arrangements for retaining and re-providing accommodation and compensating businesses as a consequence of redevelopment; E1(b) (v) ensuring affordability and security of tenure of any employment floorspace re-provision through - initially taking into account rents prior to redevelopment - any negotiated uplifts are not as a result of unnecessary enhancement of re-provided space - any new future rent and service reviews are in line with RPI - minimum of 10-year leases are provided.
110	2544	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E1		And also additional points: E1(d) OPDC will carry out regular monitoring of loss of and relocation of businesses and jobs that will be accessible to members of the public. E1 (e) OPDC will also co-operate with the boroughs in monitoring the loss of businesses and services in areas adjacent to the OPDC area – particularly Harlesden and Stonebridge (highlighted in SP1 text para 3.5 as where the need for bringing tangible benefits for local communities).
110	2545	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E1		These policies will require further explanation and discussion in supporting text: • Proposed new supporting text 9.12a - Applicants should provide evidence to demonstrate the support provided to sustain businesses and social enterprises in transition to new land uses. Details of businesses on premises, relocation, tenancies terminated and land acquisitions which led to close of businesses since the first public consultation on the Old Oak Vision (July 2013) should be disclosed with applications for pre-application discussions with OPDC officers (and included as part of supporting documents for applications). Effective arrangements for retaining, re-provisioning accommodation and compensating businesses including for capital, fitting and operating losses as a consequence of redevelopment should be set out as a planning condition. The OPDC will regularly monitor loss of and relocation of businesses and jobs, through desktop research, field observations and visits. Public requests for relevant information for a register of businesses will be made in the usual way, through direct contact or public advertisements. This policy will apply equally to businesses as to social and community uses,

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								including cultural workers and makers, users of affordable workspaces, not for profit organisations, churches, and registered or unregistered assets of community value.
110	2546	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E1		These policies will require further explanation and discussion in supporting text: 9.11a. - The OPDC in de-designating long-established SIL land incorporating secure and long standing affordable business, creative sector and not-for-profit accommodation has led to significant windfall gains for a few landowners, and significant income streams for OPDC to direct to the development of the area on behalf of the Mayor through S106 and CIL. In the process, business leases are being terminated (even years ahead of actual development plans) leading to significant losses for individual firms; businesses and social enterprises have been placed under unprecedented pressure from developers to sell; and banks have seen growing benefit in foreclosing early on mortgages. The Appendix of the Industrial Land Review provides a summary of estimated employment per site, and can provide a starting point for pre-application deliberations on re-provision, relocation and compensation. The OPDC acknowledges that the livelihoods, jobs and lifetime efforts of many who have built up businesses in a seemingly secure location are being undermined, which can lead not only to income loss or poverty, but to stress and ill-health. - 9.11b. The OPDC will ensure the retention in the Old Oak area as far as possible of existing firms and jobs, including social enterprises, NGOs and community activities, through creating an accurate register and data base, monitoring changes, introducing planning conditions to ensure re-provisioning, and requiring transparency of landowners in relation to businesses facing disruption and dislocation. The OPDC will establish best practice in relation to ensuring that development and regeneration brings benefits to London and local areas, without unnecessarily destroying existing economic activities, undermining economic resilience of the capital, or depleting its distinctive urban vitality (in line with core London Plan visions) in the process.
110	2547	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E1		These policies will require further explanation and discussion in supporting text:9.11c. Proposed additional text: [An accurate description of the existing Old Oak industrial and employment clusters and land uses should be provided at this stage, including appropriate evidence from the ILR so that it is clear and plain to the public the nature of the changes being anticipated, and that the potential loss of jobs and businesses can be accurately considered alongside the planned new development and jobs.] The OPDC commits to monitoring changes in employment, firms, ownership and tenancies in Old Oak by creating a regularly updated and publicly accessible data base of firms displaced, or facing relocation, since the opening of the consultation on the Vision for Old Oak prepared by the Mayor and the three affected London Boroughs (July 2013)."
110	2548	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E2		The policy is not justified or effective. We were pleased that Officers' responses to issues raised in relation to the Reg 18 Draft have been positive on a number of issues. We recognise that the statements regarding supporting existing businesses are encouraging, including the statements to encourage re-provisioning of different tenure types and sizes of office spaces, creative approaches to meantime uses, including re-provisioning for providers and users of artist's studios and other affordable work space (E2, para 9.18). However, we feel that these statements need to be backed up with a stronger policy commitment, and monitoring, as well as scope for effective enforcement, and make suggestions below, otherwise they simply render the policy ineffective and unsound. Furthermore, as discussed in relation to SP5 and comments on the Introduction to Chapter 9, this policy does not present or take account of strong evidence of potential displacement of businesses and loss of employment.
110	2549	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E1, E2		The policy is unsound as the evidence base is inaccurately used in relation to job losses and the stated expected provision of "67,900 net additional jobs". This is an error, and the Development Capacity Study figure used here represents only NEW jobs. The net jobs discussed in the Industrial Land Review include taking account of significant job losses, which are of grave concern, given that the Park Royal Industrial Atlas revealed significant clusters of vibrant businesses and substantial employment in Old Oak. To respond to this deleterious effect of the OPDC local plan, we insist that a stronger monitoring commitment is required to be able to effectively implement the plan's currently vague and unclear statements about supporting businesses who face relocation. Currently jobs data presented in this policy do not allow for any of these jobs and businesses to be accommodated in the OPDC area, even though Employment Policy E1(b)i suggests this is anticipated, and both the IIA and the Industrial Land Review recommend it. The document fails to convey the inequality effects of job loss on the local community who are disproportionately employed locally.
110	2550	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E2		The re-provisioning of premises for existing businesses is anticipated in Policy E1. If policy E2 does not expect re-provision of existing business and cultural uses premises to be potentially included in all developer applications, then there will be a conflict between the two policies, and the policy to support existing businesses and cultural uses will be ineffective, and is unrealistic.
110	2551	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E2		We strongly endorse E2 (d) (iii) which was a specific request of local businesses who might need re-provision on sites, to have a range of tenure and size options.
110	2552	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E2		We suggest • E2 and text relating to supporting text 9.18 be amended and strengthened similarly to proposals for changes in relation to supporting text 9.12 / 9.12a (GUA response to Policy E1), regarding artist's studios and cultural workers.
110	2553	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E2		We suggest • Re policy E2 (d) – delete "over 1000 square meters": All development applications, especially those with existing businesses on site, must make provision for possible accommodation of any existing and potential business and creative sector/artist uses on their site. Failing to expect this of all potential applicants could lead to a systematic lack of possibility to implement policy E1 (b), especially for small businesses and owner-occupier businesses on smaller sites. This will make the policy both ineffective, unrealistic, and with significant equality consequences.
110	2554	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E2		We suggest • E2 (d) (i): Wording should request engagement with "existing and potential occupiers"
110	2555	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E2		We suggest • E2 (d) (ii): Insert wording: "to meet the needs of and provide for existing and potential small business uses on their site"

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110	2556	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E2		We suggest • E2 (d) (vi): Move a sentence from paragraph 9.18 and rephrase to ensure policy is effective: “OPDC will protect and/or re-incorporate studios within new developments, in accordance with Policy E1.”
110	2557	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E2		We suggest • Provide additional text Monitoring and evidence of existing users as per policy E1 (b)(iv) [proposed above] “...will be required of all applicants”.
110	2558	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E2		We suggest • We welcome text paragraph, 9.18, but recommend that the core commitment to re-provisioning for existing uses be incorporated as the Policy E2(d) (vi) as proposed above.
110	2559	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E3		Policy E 3 is welcome for its commitment to supplying new small and affordable and open workspace for small businesses and artists' studios.
110	2560	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E3		E3 (b) is unsound as it is currently in conflict with that in E2 (d) (iii) and Policy E1(b).
110	2561	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E3		However, policy E3 (b) is not effective as it is currently in conflict with policy E2 (d) (iii) as it does not permit individual ownership of premises. It does not specify the need for a range of tenure options (as indicated in policy E1 (b), including the potential to individually own business premises, which is often a key cost consideration for small businesses. Requiring management of rental premises as the provisioning of small and affordable workspaces implies a lack of ownership options for small businesses which will preclude existing small businesses which own their properties in Old Oak and the Park Royal HS2 reserve area being able to access affordable work spaces consistent with their business model, as indicated in policy E1 (b). More permissive arrangements for provisioning individual sites for individual small businesses in affordable accommodation are required.
110	2562	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E3		Proposed additional text to para 9.24 9.24. There are outstanding examples of local artist's studio providers in Old Oak already and their potential role in the future of Old Oak North should be directly acknowledged. Insert after, “....Acme Studios in Southwark, ACAVA, Hythe Road, Old Oak; Northwest Studios, Hythe Road, Old Oak..”
110	2563	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E4		This policy is not effective. Policy E4 (b) is ineffective as it will not be easily realised within the financial envelope of the development, especially if the options for (a) use of SIL land and (b) reversion to residential use only at some future stage, are not permitted. It misses an opportunity to manage incompatible land uses at the borders of industrial and residential land uses in the OPDC area and proposes only to locate lower value live-work units in high value residential areas, which might not be attractive to developers. We recommend use of some edges of SIL land which are currently occupied by inappropriate land uses to make best use of land for intensification to enhance existing residential environments and maximise land values of existing and new residential developments. This is essential if Chapter 11 (Delivery and Implementation) is to be determined as sound. Therefore. we recommend: E4 (b) insert text in bold: “they are usually outside of SIL”. The opportunity for live-work units on the border between industrial uses and existing and future residential areas should be kept open, to create an appropriate buffer between incompatible land uses (e.g. heavy waste/recycling and construction waste depots) and existing residential uses (e.g. TITRA those adjacent to the Island Triangle, Old Oak North), and potential re-use of the HS2 reserve area. Given the difficulties associated with intensifying land use in Park Royal, as indicated in the ILR, these kinds of units could be a helpful way to achieve intensified use of well-located SIL land.
110	2564	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E4		E4(g) is not effective in terms of implementation as precise standards and levels or monitoring procedures for noise and air pollution/smell controls on work uses are not stipulated. Concern exists about how noise and air quality controls will be managed with work units and studio spaces. This policy is not feasible without clear indications of how these will be controlled through circumscribing uses and hours of operation. Text point 9.32 (e) is incompatible with this, and is perhaps an error. It should be amended, as environmental performance criteria for live-work units will need to be more stringent than for residential units given their potential uses.
110	2565	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E4		This policy is unsound as it does not stipulate that residential levels of open and green space provision, and social infrastructure, must accompany these land uses. An additional item in this policy should state this expectation clearly.
110	2566	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E4		A variety of bedroom sizes should be provided to enable households with children to benefit from them. This would also support their longer-term potential for and proximity to residential uses. This would also enable them to be more easily brought forward by developers, as a meantime and interim use.
110	2567	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E4		Not identifying live-work units as a possible interim use is unsound as it is in conflict with Policy TCC9, which imagines a quite lengthy period of meantime uses, of which this might be one.
110	2568	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E4		Contrary to 9.34, home-ownership live-work tenures would be essential to business viability of some operations and should be permitted. They might also enhance the viability of bringing these units forward, as developers will be more easily able to realise the value of their investment early on.
110	2569	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E5		The policy is not effective. Mention of the legal S106 agreement regarding the LLESMP is only in the supporting text (9.39). The actual policy component needs to be strengthened and expanded, using suitable elements from the supporting text to ensure the policy is effective.
110	2570	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E5		In addition, the policy E5 and supporting text 9.38 is vague, insufficiently clear, as to which applicants (“major”?) will be required to engage in these activities, and will therefore be ineffective. Similarly, these policy objectives will not be able to be realised where many smaller developments are being brought forward, with a disproportionately strong impact for local residents, leading to equality issues.
110	2571	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E5		Our view is that all developments should be required to propose a relevant form of LLESMP, as part of S106 agreements, especially concerning training, local jobs and London Living Wage, which should be expected of all employers and subcontractors on all developments.

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								It should be non-transferable against other S106 obligations. In addition, how follow-up monitoring will be undertaken by OPDC needs to be identified.
110	2572	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E5		The following changes and additional text for Policy E5 are proposed: - "Major" should be deleted from the policy and the supporting text, which should simply read in all cases, "Development proposals will be required to...". Standard minimum expectations for local employment should be set, including matching the proportion of current workers in the Old Oak area from the three OPDC boroughs. - Stronger implementation directions are needed in policy: - Added sentence for policy: "The management plan element of the LLSESMP will be secured via a legal (s106) agreement." - Added policy sentence: The developer and all firms and sub-contractors working on the development will be required to confirm to the LLSESMP."
110	2573	Community Group	Sharon Hayward	Grand Union Alliance	Employment	E5		The following changes and additional text for Policy E5 are proposed: - Section 9.39 should state the need for these agreements as contribution to mitigation of socio-economic impacts of the development on the local residents: - Insert in 9.39: "...Given these benefits, the LLSESMP will form a key part of the measures required to mitigate socio-economic, transport and environmental impacts to make development acceptable. The obligations would be related to the construction and/or..."
111	2677	Local Resident	Jeremy Aspinall		Employment	E1		Local residents have a desire to encourage creative businesses, artists studios and independent retailers to ensure that the area retains and enhances its personality. Here, a stronger commitment to the reprovisioning of affordable studio and office space is required, through monitoring and expecting developers to offer information about tenants and existing uses, to ensure reprovision can be enabled. Please see GUA response for detail.
113	2707	Local Resident	Thomas Dyton		Employment	E1		Local residents have a desire to encourage creative businesses, artists studios and independent retailers to ensure that the area retains and enhances its personality. Here, a stronger commitment to the reprovisioning of affordable studio and office space is required, through monitoring and expecting developers to offer information about tenants and existing uses, to ensure reprovision can be enabled. Please see GUA response for detail.
117	2815	Community Group	Jeffrey St. Paul	Pentecostal City Mission	Employment			In broader terms, the sub-regional focus of the Local Plan should include targeted measures for supplier development to enable the SME and the third sector to compete for access to the procurement of contract opportunities resulting from the investment in regeneration of the area. How the local plan replicates the learning from the knowledge base of the Park Royal Food innovation Centre to the other dominant food and logistics sectors will be important. Equally how the local plan encourages partnerships and collaborative working between local community experience and expertise to capitalise on the projected growth in the creative industries in the Old Oak and neighbouring White City Opportunity area will be critical business, jobs and economic growth.
118	2831	Planning Consultant	Rory McManus	Turley (on behalf of Ashia Centur Ltd)	Employment	E1		It is noted that Draft Policy E1 seeks to protect the functioning, attractiveness and competitiveness of the Strategic Industrial Location (SIL) and its ability to support employment and economic functions. The policy goes on to state that this should be done by providing SIL compliant broad industrial type uses, by increasing or at least maintaining, employment densities and that there should be no net loss of industrial floorspace unless this is required to make a more efficient use of space and provided this would not have a significant adverse impact on the overall amount of industrial floorspace in the SIL. It is considered that this policy is too narrowly focused and does not adequately address our client's site which should not be allocated as falling within the SIL for the reasons set out under the 'Headline Considerations' section above.

Town Centre and Community Uses

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
2	4	Local Resident	Roy Chapman		Town Centre and Community Uses	TCC8		Bitterly disappointed that the proposal for QPR to have their new stadium within this redevelopment appears to be out of the question. A great shame as the possibilities would have been huge for the new community.
4	6	Local Resident	Michael Hangyal		Town Centre and Community Uses	TCC4		Hi to raise my concerns I support development and regeneration and I welcome any changes to the area, but we need to focus on the current issues before we can consider any regeneration plan to go ahead. We need to focus on health care for working people they don't have the luxury of sitting in doctors surgery's or wait for appointments that are not suitable, just to get a doctors note to prove that they were unfit for work, any tax payer should be given preferential treatment and not be discriminated against unlike a person claiming state benefit, we seriously need to treat people who work and contribute to the economy and not promote the benefit culture until we start looking after working people and giving them priority, the system will never be fair, working people have no rights, we seriously need to look at how we deal with discrimination. We need to accommodate the current issues before we can even consider taking on 25,500 new homes and 65,000 new jobs for London. How many construction workers are required to build 25.500 and over what period ? How have you calculated this figure. Once the project is complete out of the 65,000 jobs how many local jobs will remain after the project is complete the 65.000 estimate is based on what findings and in what sector and how will this benefit the local economy once the construction is complete. The hospital A&E DEPARTMENTS are over loaded, surgery's cant cope doctors are given impossible targets, not enough schools for our children to provide the education for what they being deprived of before you look at the long term benefit you need to resolve the current issues what are here now and not look 20 years into future. Because I'm not convinced until we deal the current issues by building all these new homes we just gonna add to the problem. Build a hospital,doctors surgery's and schools before you start building property's to add to the problem .First look at the existing problem before you add to it, if you can eradicate the current issues I have raised its not homes we need to build its schools,doctors surgery's hospitals lets deal with the short term problem because I'm sure if we concentrated on the more fundamental issues rather than quoting numbers and make contact with reality, and face up to our responsibility and take humanity as we are all equal and respect each other for the contribution we make so others can benefit from our hard work a kindness.
5	7	Local Resident	Susannah Abeyasekera		Town Centre and Community Uses	TCC4		Dear OPDC, Thank you for your leaflet I recently received through my door. I am writing because in the leaflet you invite us to have 'our say'. I am an early years provider – currently as a childminder and for the last few years I have been looking for an opportunity to expand my business to run a children's nursery. However, my difficulty to do this, is that there are very few appropriate accommodation classified as D1 premises specifically for education. Properties of this classification are very few and the competition is fierce when such a property arises. I would like to see and have reassurance from yourselves that this kind of property will be accommodated in the regeneration – particularly for private businesses such as myself. I would also be very interested in putting my name forwards as a prospective tenant for such a property in the development. Please can you advise how I might be able to do this? I would also be willing to advise on this matter as properties of this kind have strict guidelines to follow outlined by Ofsted and the statutory framework, whereby developers and even councils overlook as they are not aware of these and very often buildings which offer D1 are inappropriate. I look forward to hear from you. Yours faithfully Susannah Abeyasekera
8	12	Local Resident	Jamie Glazebrook		Town Centre and Community Uses	TCC5		In this email I'd just like to comment on the section addressing Culture and Art (POLICY TCC5). All your points about encouraging cultural vibrancy are great. In addition to this, Old Oak need to be home to a cultural destination of some sort. By this, I mean something cultural that people will travel across the country to visit. It could be a concert hall, or a theatre, an art gallery, or a museum. But it has to be world class. For example, The National Theatre, The Royal Festival Hall, The BFI, Tate Modern, the V&A. These institutions have potential to not just attract audiences, but also be educational, and provide outreach into the community. Crucially, they remain vital to a community even in times of recession. I have been to previous consultations and thus I know that these conversations have been happening. They need to stay central. Look at the effect of the Barbican, the Old Vic, the British Library etc all have on their respective areas. This is not just the right thing to do. It will make you more money, because people coming to the theatre/concert/art gallery etc will also want to spend money in the area. An area needs a symbol. The wonderful station will be one, but there is the opportunity of another, far more powerful. Thank you for reading.
17	122	Strategic Partner	Steve Craddock MRTPI	Canal & River Trust	Town Centre and Community Uses	TCC5		The Trust supports the OPDC's intention to secure contributions towards and/or the provision of public art through policy TCC5. We are keen to promote and explore new opportunities to use canal corridors as focal points for artistic and cultural schemes and have been engaging with the Deputy Mayor for Culture on this. We note that the proposed Grand Union Square is identified as one such opportunity area in policy P2C1. We welcome this and would be happy to discuss further opportunities to deliver art on/beside the towpath in the OPDC area.
18	124	Strategic Partner		London Obesity Leadership Group	Town Centre and Community Uses	TCC2	d) i)	This policy is welcomed as it supports the ambitions laid out in the proposed London Health and Care Devolution plans (not yet published).

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18	125	Strategic Partner		London Obesity Leadership Group	Town Centre and Community Uses	TCC2	d) ii)	This policy is welcomed to support London's ambition to change the obesogenic environment to make the healthier choice the easier one. This should lead to an environment which reinforces the promotion of health and supports London's children to be healthier by reducing the prevalence and appeal of unhealthy options and supporting parents by making healthier choices as easy as possible, reinforcing national messages about healthier eating. It is noted that the London devolution proposals suggest that new hot food takeaways should be located outside of 400 metres walking distance of the entrance/ exit of primary schools given the high rates of obesity in years 6 students in London. Given this, the London Obesity Leadership Group would encourage OPCD to match this ambition by changing the specified distance from 200m to 400m zones of primary schools.
18	126	Strategic Partner		London Obesity Leadership Group	Town Centre and Community Uses	TCC2	d) iii)	This policy is welcomed in respect of hot food takeaway overconcentration in centres.
18	127	Strategic Partner		London Obesity Leadership Group	Town Centre and Community Uses	TCC2	d) iv)	This policy supports London's ambition to respect hot food takeaway overconcentration in centres.
18	128	Strategic Partner		London Obesity Leadership Group	Town Centre and Community Uses	TCC2	d) iv)	It is promising that the plan promotes operating in compliance with the Healthier Catering Commitment scheme as this is one of the recommended actions found in the Local Government Declaration on Sugar Reduction and Healthier Food. However, the London Obesity Leadership Group would suggest the OPCD encourages organisations within its jurisdiction to operate in compliance with the Governments Food Buying Standards.
18	129	Strategic Partner		London Obesity Leadership Group	Town Centre and Community Uses	TCC2	d)	Background information and supporting evidence Why is childhood obesity an issue? • London compares badly to other global cities when it comes to obesity, having a higher proportion of obese children than: New York, Toronto, Sydney and Hong Kong to name a few examples[4]. • In London in 2015/2016, 19.8% of children in Year 6 (aged 10-11) were obese and a further 14.3% were overweight, or a total of 38.1%. This has increased from 37.2% in 2014/15 highlighting the need to take action[5]. • Obesity is linked to many serious health risks in both children and adults and is the cause of many life-limiting conditions such as Type 2 diabetes. Obesity is also more likely to cause mental health problems such as depression and low self-esteem[6]. • There are big differences in childhood obesity rates across London. The most deprived children in reception year and year 6 are twice as likely to be obese as the least deprived children[7]. The Great Weight Debate During last year London spoke to over two million Londoners through the Great Weight Debate. The Great Weight Debate spoke to London about what measures people would support towards achieving a healthier environment. The initial results showed that Londoners supported limits on the number of fast food shops and asked for more healthy food and drink to be available at an affordable price on our high streets. The relationship between fast food outlets and childhood obesity has been robustly researched and documented: • There are over 8,662 fast food shops in London, with the average 'chicken shop meal' of chicken, chips and a drink containing 70% of an adult's daily calories. • The proximity of shops selling unhealthy food has been linked to the prevalence of obese children in a local area. • Children were found to be most likely to spend their money on confectionary, crisps, chocolate and canned drinks than any other food. • Based on research in the London Borough of Newham, 38% of 13-14 year olds eat fast food at least once a week and 12% eat fast food every day[8]. Updated planning practise guidance from the Department for Communities and Local Government further supports the role of local planning in regard to proximity of new fast food to schools and recommends planners take particular regard to: • Proximity to locations where children and young people congregate such as schools, community centres and playgrounds. • Evidence indicating high levels of obesity, deprivation and general poor health in specific locations. • Over-concentration and clustering of certain use classes within a specified area. • Odours and noise impact[9].
23	182	Local Authority	Cllr. Muhammed Butt	London Borough of Brent	Town Centre and Community Uses	TCC2		The Retail & Leisure Needs Study sets an upper thresholds for retail development. Paragraph 7.4.3 of the study states the purpose of this threshold is to 'balance the needs of the development and the requirement to ensure that the existing network of centres can also benefit from spending growth, providing wider benefit to the network of centres.' The thresholds are referred to in supporting text, but are not reflect in the town centre policies. In effect this means there is no limit on scale of retail development in Old Oak. Retail development could significantly exceed the thresholds proposed in the Retail & Leisure Needs Study and have a significant detrimental impact on the viability of the town centre hierarchy. This is a significant change from the Regulation 18 Local Plan policy 'TC4: A-Class needs.' Without this policy there is nothing in the town centre chapter to ensure development protects the town centre hierarchy, as required by the NPPF and London Plan. The Council is of the view wording from policy TC4: A-Class needs to be reinstated for the Plan is to be sound. Change sought: Insert wording of Policy TC4 from previous Local Plan.
23	183	Local Authority	Cllr. Muhammed Butt	London Borough of Brent	Town Centre and Community Uses	TCC2		In addition, it is unclear how the threshold of 5,000sqm has been arrived at. It is considered in establishing a threshold it would be appropriate to use the approach set out in the Planning Practice Guidance for retail impact assessment i.e. to consider the scale of known proposals relative to town centres; the existing vitality and viability of town centres; the cumulative effects of recent developments; the likely effects on a town centre strategy and the impact on any other planned investment. In terms of the scale of proposal relative to town centres, Harlesden as with many of Brent's Town Centres is characterised by relatively small retail units. The average size of a comparison unit in Brent's district centres is 215sqm, and convenience 154sqm. In this context, development of town centre uses below 5,000sqm could have a

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								significant impact on Harlesden. Brent Council's Local Plan sets a standard of 500sqm for retail impact assessment. This was informed by a Retail Impact Assessment Threshold Study produce in accordance with criteria in the PPG, and tested at Examination. In addition, under the proposed policy there is potential for development to cumulatively total 5,000sqm, without being required to contribute to mitigation. It is considered as a maximum the threshold should be 2,500sqm, reflective of the default standard in the NPPF.
23	187	Local Authority	Cllr. Muhammed Butt	London Borough of Brent	Town Centre and Community Uses	TCC4		Brent Council believes this aspect of the Plan is unsound on the grounds it is not positively prepared as it fails to meet the infrastructure needs of the development.
24	200	Agent	Harriet Barber MRTPI	Montagu Evans (on behalf of T.A.S.B. Investments Limited)	Town Centre and Community Uses	TCC10		Policy TCC10 (Visitor Accommodation) identifies the need for OPDC to contribute towards London's overall need for an additional 40,000 high quality hotel bedspaces. Accordingly, Policy TCC10 states that proposals for new visitor accommodation will be supported where they: i. Are located in accordance with the NPPF sequential test and/or close to public transport; ii. Do not result in unacceptable impact on residential amenity; iii. Provide at least 10% of hotel rooms as wheelchair accessible; iv. Are not permanently occupied; and v. Do not compromise the supply of housing. Policy TCC10 identifies that OPDC will also support the provision of business hotels and multi-functional convention facilities. Our Client agrees with the approach to visitor accommodation proposed under Policy TCC10.
29	310	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Town Centre and Community Uses	TCC7		Our clients strongly object to the wording of Policy TCC7 which is overly prescriptive and restrictive towards the loss of public houses. The proposed policy should be sufficiently flexible such that it can respond to the market as necessary, and in order to be “effective” as required by paragraph 182 of the National Planning Policy Framework (NPPF). Indeed, CAMRA state in their Public House Viability Guidance “times and circumstances do change and some pubs will find themselves struggling to continue.” Planning policy needs to be able to quickly and effectively respond to that, rather than be a financial burden on owners or operators.
29	311	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Town Centre and Community Uses	TCC7	a) and b)	The identified period of 24 months is considered far too long and presents an unreasonable length of time to market a property, particularly if the business is clearly no longer viable. In our view, 6 months would be a more sensible period and certainly no more than 12 months as adopted for other uses within the proposed plan (Policy TCC3, 4, 5 and 6). Indeed, standard industry practice and the CAMRA guidance referred to below recommends 12 months. It is unclear on what basis 24 months is justified.
29	312	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Town Centre and Community Uses	TCC7	a) and b)	“Competitively marketed” is not standard industry practice, doing so would adversely affect value and viability as the business would decline, staff would leave, it would be difficult to recruit etc. The policy is poorly worded and does not reflect reality. Development control policies should not be worded to be so inflexible that a landowner or operator would stand to make a loss over a significant period of time due to a change in circumstances. It also has the potential to be redundant if it can be demonstrated that the use is unviable and therefore there would be no interest to other users. Please also see comments made at (a) above as they apply equally to this proposed draft text – this is not how the industry operates and to do so would adversely affect the value and viability of the public house. Again, it is unclear on what basis this is justified as a sound or effective approach.
29	313	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Town Centre and Community Uses	TCC7	b)	“Appropriate publications” lacks definition and is poorly worded.
29	314	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Town Centre and Community Uses	TCC7	c)	This element of the policy is vague and lacks the definition necessary to be considered “effective” in the context of paragraph 182 of the NPPF. Both “all reasonable efforts” and “all diversification options” are unreasonable and far too broad to constitute a reasonable policy. If marketing and viability evidence (as required by (a) and (d)) can be submitted, this part of the policy becomes redundant and should be removed.
29	315	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Town Centre and Community Uses	TCC7	d)	The policy should be reworded and seek to avoid too much reliance or emphasis on a single test, by an organisation with a specific focus. The CAMRA test is not objective but rather is a checklist, and as such is subjective. It does not necessarily represent industry practice (e.g. is 1 mile a suitable yardstick, or should this be 400m or 800m?) and it may be counterproductive to wider Development Plan objectives to enshrine what is essentially a wish-list into development control policy. Flexibility and the ability to adapt to change should be at the heart of policy, and care should be taken to avoid policies which are overly prescriptive or which run contrary to other objectives.
29	316	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Town Centre and Community Uses	TCC7	e)	This element of the policy is overly prescriptive and the requirement to assess alternative licensed premises is not consistent with national policy as required by paragraph 182 of the NPPF. Independent of this the concept of “similar facilities” and “similar community environment” are too subjective and broad to form an appropriate policy test. This is a separate matter to a public house being unviable, and the policy as worded goes beyond a specific application for a specific site. There may be many other venues nearby, there may be none. The policy is too onerous as currently worded, and is therefore not justified or sound.
29	317	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Town Centre and Community Uses	TCC7	f)	Recognition should be made within this element of the policy that alternative uses could themselves generate a positive impact and one beyond that currently provided by a pub, on the character and vitality of an area through the demolition and redevelopment of the existing site of a pub rather than seeking to retain the built fabric. This strand of the policy is at odds with the other elements which seek to preserve the provision of a viable public house as opposed to the built form of the building. It should be noted that various bars/cafes and restaurants etc. are planned as part of the new developments that are now coming forward in the area.
29	318	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Town Centre and Community Uses	TCC7	g)	This strand of the policy assumes that a definitive conclusion can be reached through a public consultation exercise. There is no guarantee that this would be the case and that the consultation exercise could capture the views of the majority of the local community who may have no interest in the value of a public house.

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29	319	Planning Consultant	Dan Di-Lieto	Lichfields (on behalf of Citrus Group and Fuller Smith & Turner)	Town Centre and Community Uses	TCC7	h)	Separate legislation is already in place for this process as part of the The Assets of Community Value (England) Regulations 2012 and as such this strand of policy is considered superfluous.
30	328	Local Authority	Steve Barton	London Borough of Ealing	Town Centre and Community Uses	TCC4		Ealing notes that OPDC's plans for school places depend on provision at John Perryn, West Twyford, and Ellen Wilkinson schools. These currently operate with only a small surplus capacity (2-6%) and would therefore require expansion in order to absorb the growth envisaged by OPDC. Further planning work will be necessary on each of these sites in order to establish their capacity for development and we would like additional engagement with OPDC before these plans are finalised. Ealing also supports the Joint Statement on schools agreed with Brent and LBHF which has been sent under separate cover.
30	329	Local Authority	Steve Barton	London Borough of Ealing	Town Centre and Community Uses	TCC4		In respect of healthcare infrastructure we would encourage further engagement with the local Clinical Commissioning Groups to ensure that estimates of need and strategies for provision are as accurate as possible.
30	385	Local Authority	Steve Barton	London Borough of Ealing	Town Centre and Community Uses	TCC1	e)	Supporting the 'viability' of industrial business operations is extremely open-ended and could be taken to include their financial viability. The policy should be clarified to ensure that it is not used in support of otherwise non-conforming uses within the SIL. SIL policy already has difficulty in managing many quasi-retail uses and Park Royal has historic concentrations of non-conforming retail uses.
30	386	Local Authority	Steve Barton	London Borough of Ealing	Town Centre and Community Uses	TCC4		The current policy makes only passing reference to co-location of social infrastructure with housing or other SI uses (para 10.40), which is both good practice encouraged by the GLA Social Infrastructure SPG and will most likely prove necessary throughout the OPDC area.
30	387	Local Authority	Steve Barton	London Borough of Ealing	Town Centre and Community Uses	TCC4	c.iii	Suggest; 'in locations that are highly accessible to the populations that they serve...' The strategy for the provision of health services in particular may well mean that they are designed to serve people who travel further than the 'existing and new communities in the area'.
30	388	Local Authority	Steve Barton	London Borough of Ealing	Town Centre and Community Uses	TCC9	a.iii	It may be worth broadening this to clarify that meanwhile uses should never compromise longer-term plans. The current policy and supporting wording are too loose in circumstances where these uses might compromise plans but could be said to 'support the longer term success of the development'.
33	403	Strategic Partner	Mark Furnish	Sport England	Town Centre and Community Uses	TCC6		Sport England has reviewed the Draft Local Plan in light of these planning objectives and national planning policy set out in the National Planning Policy Framework (NPPF) and are concerned that there is almost no reference to playing field or pitches, including ancillary provision, within the document whilst the policies, and supporting text, is vague when appearing to refer to indoor and outdoor sport and leisure provision. Sport England would expect that the Draft Local Plan has specific standalone Policies that address indoor/built and outdoor and playing field/provision that reflect Sport England's planning objections and the NPPF. These policies should be informed by robust and up-to-date strategies for the area the Local Plan covers, such as a Playing Pitch Strategy (PPS) and Built Facility Strategy (BFS), which OPDC does not appear to have produced. Sport England, therefore, does not consider that the Draft Local Plan has been positively prepared or is consistent with national policy and consequently consider it to be unsound. As a result Sport England objects to the Local Plan Revised Draft for Regulation 19. This objection and other comments relating to the document are detailed out below.
33	419	Strategic Partner	Mark Furnish	Sport England	Town Centre and Community Uses	TCC6	a.i	protects facilities unless they are no longer economically viable but the NPPF, paragraph 74, and Sport England's policy is clear that a surplus must be identified in an up-to-date and robust strategy/assessment, such as a BFS or PPS not merely because its potentially economically unviable.
33	420	Strategic Partner	Mark Furnish	Sport England	Town Centre and Community Uses	TCC6	a.ii	A facility should not merely be 'appropriately' replaced or provided but it should be replaced with a facility of at least equivalent quality, quantity and accessibility as stated in the NPPF.
33	421	Strategic Partner	Mark Furnish	Sport England	Town Centre and Community Uses	TCC6	a.iii	could be used to support a situation where residential properties are constructed adjacent to sports facilities and once occupied the residents raise concern with matters such as noise which could ultimately result in the loss or restriction of use of the sports facility. Unless the facility is replaced or identified as surplus, then the loss of the facility would be contrary to the NPPF, paragraph 74.
33	422	Strategic Partner	Mark Furnish	Sport England	Town Centre and Community Uses	TCC6	b.i	It's unclear why the criterion in b) i) is included within a sports and leisure policy since these should be addressed in the specific policies relating to the transport network and amenity. It is also not clear what falls within the category of 'transport network' and 'amenity' as these terms are very broad.
33	423	Strategic Partner	Mark Furnish	Sport England	Town Centre and Community Uses	TCC6	b) c)	The enhancements and new provision should stated in b) and c) be based on up-to-date and robust strategies so that the right enhancements and provisions are in the right places and delivered at the right time to mirror the area's growth. In this respect, it is not clear to Sport England how the new sports and leisure centres have been identified as there does not appears to be a robust and up-to-date BFS for the Old Oak and Park Royal Regeneration Area. Sport England does note, as stated paragraph 10.52, that some work was undertaken by Hammersmith and Fulham Council in relation to swimming pools and sports courts but there has been little undertaken with regard to other built facilities. In addition this work was focused on Hammersmith and Fulham taking account the growth at Old Oak and Park Royal and whilst that the Old Oak and Park Royal regeneration area might have a similar catchment area, it is not the same.
33	424	Strategic Partner	Mark Furnish	Sport England	Town Centre and Community Uses	TCC6	c)	advocates a standards approach which is not supported by Sport England. The provision of new facilities, whether they are built sports and leisure centres, playing fields or other facilities should be informed by an up-to-date and robust strategies which OPDC does not have. As indicated above, the actions and recommendations from these strategies should form the evidence base and inform the Local Plan and Infrastructure Delivery Plan which has not occurred in this instance. As a result, Sport England does not consider that the Draft Local Plan has been positively prepared or is consistent with national policy, in particular paragraph 73 of the NPPF, which states Planning policies should be based on robust and up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. In consequence, Sport England objects to the Draft Local Plan as it is unsound

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33	425	Strategic Partner	Mark Furnish	Sport England	Town Centre and Community Uses	TCC6		The policy does not differentiate between built facilities and playing fields, with the latter having limited reference throughout the whole document despite having statutory protection. It appears that Policy TCC6 and the supporting text has a focus on built facilities and very limited consideration is given to playing fields. This is evident from the from the policy requiring sports and leisure centres but no requirement for playing field. The occupiers of new development, especially residential, will generate demand for sporting provision, which includes playing field. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Playing Pitch Strategy.
36	462	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Town Centre and Community Uses	TCC1	e)	Proposed policy TCC1 part (e) (page 241) is not in conformity with the London Plan. It allows for the introduction of town centre uses in SIL and will lead to the incremental erosion of SIL. The supporting text refers only to manufacturing businesses in Park Royal selling their produce on their premises. The Mayor would have no objection if the overarching policy limited the approach to cover these ancillary sales. The town centres elsewhere in the OPDC area will provide sufficient capacity to accommodate town centre uses.
36	467	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Town Centre and Community Uses	TCC1		The draft Local Plan (page 241) identifies a potential new major town centre centred around Old Oak and includes linear corridors that link with Harlesden District town centre and a neighbourhood centre at North Acton. The Mayor is supportive in principle of a new town centre at this location and will review the evidence to support a new centre of a major scale in our work on the London Plan town centre network review.
36	468	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Town Centre and Community Uses	TCC2 TCC7		The Mayor supports OPDC's aim to ensure vibrant high streets by protecting public houses (draft policy TCC7) and by managing the overconcentration of betting shops, pawnbrokers, payday loan stores and games arcades
36	469	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Town Centre and Community Uses	TTC2	d)	He also supports the approach to limiting the proximity of hot food takeaways to schools and managing their overconcentration in order to support Brent, Ealing and H&F's Health and Wellbeing Strategies to reduce levels of childhood obesity in the area. OPDC's proposed policy TCC2 is consistent with policy 3.2 and 4.8 of the London Plan.
36	470	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Town Centre and Community Uses	TCC5		The Mayor welcomes the draft Plan's aim to provide a high quality cultural offer in the OPDC area and a cultural quarter in Old Oak. The development of Cultural Strategy could be useful in ensuring the OPDC has a long-term vision for culture over the area's development period. Draft policy TCC3 references the former Mayor's Cultural Strategy, which is now out of date.
36	471	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Town Centre and Community Uses	TCC11		The Mayor is supportive of the draft Plan's vision to deliver a thriving night time economy and culture for the area and the inclusion of the 'agent of change' principle. In addition to the Mayor's Culture and the Night Time Economy Supplementary Planning Guidance, the supporting text could also reference the Mayor's 24-hour London vision which sets out the his plan to turn London into a leading 24-hour global city and focuses on building a night-time culture which: o promotes culture and leisure for all ages and interests o increases opening hours o ensures safety for residents, visitors and night-time workers o works closely with boroughs and the police to create a balanced and sustainable night time offer
36	472	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Town Centre and Community Uses	TCC10		It is recommended that the reference to London overall need for 40,000 new hotel bedrooms in the policy TCC10 (page 257) is removed as it doesn't relate specifically to the OPDC area and may soon be out of date. New evidence for the emerging draft London Plan suggests this figure will increase. The reference could be retained in supporting text in paragraph 10.69.
42	595	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Town Centre and Community Uses	TCC3	10.2	Policy TCC3 e) and 10.20 requires 10% of retail to be in small, preferably more affordable, units of no more than 80sq m. Whilst we support the broad aims of this policy, we do not think that it is helpful or necessary to stipulate percentage targets.
42	596	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Town centre and community uses	TCC3	e)	Part e) of the policy does state that the smaller units should be focused on 'secondary retail frontages', however as these are not defined in the Plan, the impact of this cannot be determined, and we consider that it is likely to unduly constrain the commerciality of the new town centre, and could limit developer's flexibility in securing tenants. We would suggest that it would be helpful to identify the primary and secondary retail frontages – even if this is by defining characteristics rather than specific streets.
42	597	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Town centre and community uses	TCC3	10.21	10.21 requires the provision of a Town Centre uses statement, which should include how it is proposed to manage the retail uses. We do not consider that this information is relevant or appropriate, nor is it information that is likely to be known at the planning application stage. Remove this requirement
42	598	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Town Centre and Community Uses	TCC4		The Plan, through this policy and elsewhere, identifies the requirement for a significant amount of social infrastructure for the OOP site. This includes: 4FE Primary school, 4,500sqm health hub for the whole of the OPDC area, public access sports and leisure including sports halls and 25m swimming pool (alongside suggesting another 25m swimming pool in Old Oak South, a community hub of 5,200sqm split between OON and OOS. The scale of this infrastructure burden on OOP is significant and disproportionate.
42	599	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Town centre and community uses	TCC3		Whilst the Plan recognises at 10.35 the need for flexibility and 10.27 says that "retrospective pooling" could mean other sites contribute to the cost, it is concerning that delivery is anticipated to fall on the OOP development. We also do not consider that the scale of infrastructure that has been identified is actually required.
42	600	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Town centre and community uses	TCC4		In particular: - We consider that a 2/3FE primary school will be sufficient and that a 4FE primary school is too large and will be challenging to accommodate without a significant impact on the design and density of development at OOP. The supporting Education and Health Needs Study suggests that this could extend to 0.58ha, which is larger than our emerging masterplan allows for. This view is informed by our consideration that it will be very challenging for the scheme to deliver close to the 50% affordable housing target, and that the target for 25% of new homes to be family homes is too high. Reducing both of these elements of the development at OPDC will reduce the likely child yield; and

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								- The requirement for anything more than one 25m swimming pool within the OPDC area is considered to be unnecessary in relation to the average level of provision of such facilities in London. This is particularly important given the cost and other priorities for infrastructure funding. We would suggest that the requirement for a second 25m pool, or one 50m pool, is removed from the Plan.
42	601	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Town centre and community uses	TCC4		We note that the Education and Health Needs Study adopts a GLA methodology for calculating population and child yield which we believe produces numbers which are too high. We would note the following factors as being likely to lead to a reduced population and child yield: · Viability and urban design constraints mean that in reality a lower proportion of affordable housing and family housing are likely, which means that the actual population (particularly the number of children) is likely to be much lower than the evidence base suggests; · The application of the model would be made more sound with the following adjustments: - Reconsidering the sample sites used – outer London boroughs such as Brent are not a reasonable representation of what the future urban form will be for this area. - Adjusting the age splits for younger children to take account of the fact that flatted developments have a higher proportion of pre-school children relative to school aged children - Allowing for normal levels of vacancies (the model assumes 100% occupation at all times) - Allowing for specialist housing (student, elderly, build to let) and their particular occupation characteristics, which are likely to reduce the child yield
42	602	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Town centre and community uses	TCC4	c), 10.50	TCC4 c) and 10.50-51 talk about swimming pools and tennis courts, but suggests they can be private facilities with concessionary access to “those on lower incomes, and families with young people and children”. Reference is made to Fulham Pools, which were built by a gym operator as part of a wider fitness centre, but with free public access to the pool. This may be possible, but is unlikely until the area has built out a lot more.
42	603	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Town centre and community uses	TCC4	e), 10.40	TCC4 e) and 10.40 suggest that ongoing revenue funding may be sought from developers for social infrastructure in addition to capital funding. This is an unusual and onerous suggestion, and goes beyond the limitations of planning obligations. We request that this is removed from the Plan.
42	604	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Town centre and community uses	TCC4	10.37	10.37 says that proposals for large scale social infrastructure will be considered as a catalyst use in the context of policy TCC8. This requirement makes no sense, given that the infrastructure is required by the Plan. We suggest that this requirement is removed unless the proposal is for social infrastructure which has not been identified as being required by the Local Plan.
42	605	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Town centre and community uses	TCC8		Whilst we support the principle of this policy for certain uses, the inclusion of retail and leisure, culture, education and health, and business space means that major site allocations within the Plan will be required to provide a Catalyst Uses Statement. A development such as OOP, which has a Local Plan allocation including retail, leisure, health, education and business use, should not then be required to prepare a statement to demonstrate its acceptability as a Catalyst Use. This is contradictory and illogical, in particular the requirements to demonstrate financial sustainability and generating momentum for regeneration. However, we do consider that this approach is sensible for proposals which do not benefit from site allocations, and for all sports and stadia facilities or other ‘extraordinary’ uses which might also include conferencing facilities. More regular employment uses, or proposals for social infrastructure which are required by the Local Plan in any event, should not be required to provide this Statement.
42	606	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Town centre and community uses	TCC9		We do not consider it appropriate for meanwhile uses to form part of the consideration of a planning application at the initial stage, as they are not relevant to the acceptability of long-term development proposals. The Local Plan should focus on consideration of the long-term development proposals, and developers should not be required to devote time and resources to devising a strategy for meanwhile uses until they have secured the certainty of a planning permission and can make business decisions on how to deliver sites in a manner which allows their consideration of a meanwhile use strategy. If the Local Plan is to retain a requirement for the consideration of meanwhile uses, it should direct this consideration to control by planning condition or planning obligation, so that it can be considered at the appropriate time in the delivery of a development.
42	607	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Town centre and community uses	TCC9	10.66	10.66 says that meanwhile uses should be retained afterwards, with 10.68 suggesting business support and staggered rents to help meanwhile business settle into permanent spaces on site. This interventionist approach is fundamentally at odds with the concept of a meanwhile use, and will make them unattractive to developers if they are to then place constraints on them or become a burden in relation to a site’s long term development. We would suggest a much more flexible approach to meanwhile uses, which encourages them as an attractive additional element, but does not elevate them to a status which begins to impact on the consideration of a site’s long-term development.
43	622	Planning Consultant	Hannah Willcock	DP9 (on behalf of A40 Data Centre B.V)	Town Centre and Community Uses	TCC10	10.69	We are strongly supportive of Policy TCC10 where proposals are supported for new and expansion of visitor accommodation close to public transport links. We agree with the supporting text in paragraph 10.69 which states that “due to the OPDC area’s high public transport accessibility providing access to London and the rest of the UK, as well as its proximity to destinations such as West End and Heathrow, it is likely to be an attractive location for visitor accommodation.”
43	623	Planning Consultant	Hannah Willcock	DP9 (on behalf of A40 Data Centre B.V)	Town Centre and Community Uses	TCC10		We know that the hotel currently located at 628 Western Avenue is successful and is proving an attractive location for visitor accommodation, particularly in light of its close proximity to Park Royal underground station. The site is located within, but on the edge of the SIL designation and it is our view that this will continue to be an acceptable location for further hotel uses in addition to SIL uses.
44	624	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Town Centre and Community Uses	TCC4	10.32	HUDU and the CCGs were involved in the preparation of the Education and Health Needs Study, including a workshop in January 2017. There is now an agreed high-level approach, as noted in the draft Plan at paragraph 10.32, that a new health facility will be required in the OPDC area. However, in the short-term, demand for primary care services can be accommodated in existing or improved premises, including the planned primary care facility at Central Middlesex Hospital and additional capacity at Hammersmith Centre for Health. It is likely that a new facility will be required from 2022 onwards, taking into account the significant amount of new housing expected in Old Oak North and South following the construction of the new Old Oak station.

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44	625	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Town Centre and Community Uses	TCC4	10.35	We support a flexible approach, as acknowledged in paragraph 10.35, to the on-site provision of health infrastructure to take account of the timescales involved and the complexity of delivery. Inevitably, needs and health infrastructure requirements will change over the Plan period. HUDU and the CCGs would welcome the opportunity to continue to work with the OPDC to refine the housing and population projections, to model in detail future service and infrastructure requirements and ensure that sufficient new health facility space is provided in the right location and at the right time to match population growth and demand for services. There will be the need to adopt a flexible approach to the design of new healthcare space to allow the space to grow over time to respond to changing service requirements.
44	626	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Town Centre and Community Uses	TCC4		New healthcare infrastructure in the OPDC area should be planned in accordance with the NHS North West London Shaping a Healthier Future programme and the Sustainability and Transformation Plan taking account of the operational and planned out of hospital hubs within and surrounding the OPDC area and the intention to provide primary care 'at scale' with corresponding changes to the primary care estate and workforce and the introduction of new technology.
44	627	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Town Centre and Community Uses	TCC4	E), 10.27	We support the approach in criterion e) and paragraph 10.27 to secure developer contributions to deliver new healthcare capacity which could include contributions towards management and maintenance costs. There is the need to ensure that new health facility space is affordable to the NHS, both in terms of capital and revenue costs and different delivery options could be explored with the OPDC and the Boroughs.
44	628	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Town Centre and Community Uses	TCC4	10.5	It is important that both Policy TCC4 and Figure 10.5 refer to social care and the need to integrate health and social care services.
44	629	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Town Centre and Community Uses	TCC4	10.33	Paragraph 10.33 and Policy P2: Old Oak South refers to the provision of a new facility on the Cargiant site, whilst criterion c) iii) refers to the appropriate provision of health facilities within or in close proximity to designated town centres or clusters. At this stage, we suggest that a number of site options are considered, which could include phases of the Cargiant site, but also healthcare space within a community hub in Old Oak South, in proximity to the proposed Old Oak High Street (see Policy P1 (n)).
44	630	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Town Centre and Community Uses	TCC4	a)	Criterion a) of Policy TCC4 seeks to protect existing social infrastructure facilities unless there is no identified need, or the facility would be replaced. Whilst the emphasis on protection and re-provision is understood and is important, we suggest that, in the case of health infrastructure, the wording needs to positively support the transformation of NHS services where flexibility is required to make best use of current estate and dispose of surplus sites for housing.
47	714	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Town centre and community uses	TCC1		We support the OPDC's ambition of focusing town centre uses within the designated town centres. Such an approach will enable the success of these centres, helping give the focus that the area requires.
47	715	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Town centre and community uses	TCC1		We do not object to the scale of the A class floorspace being proposed within the OPDC's area. Having had regard to the Retail and Leisure Needs Study prepared by PBA we are satisfied that the quantum of A class uses proposed is such that it will largely serve the needs of those living, working and travelling through the Old Oak area. As such, we are satisfied that as drafted, the quantum of A class floorspace being proposed is unlikely to have a detrimental impact on the existing centres within RBKC.
47	716	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Town centre and community uses	TCC3		To this end we welcome the requirement, within TCC3(f) (A-Class Uses), that a town centre uses statement is required for proposals including more than 5,000 sq m of town centres uses within the Old Oak High Street Major Town Centre. This is an appropriate approach that reflects the long-time scales involved and the fact that the nature of the retail sector may differ in the future. We particularly encourage the supporting text to TCC3 which states that such an assessment is necessary as, "there is a need for a greater degree of scrutiny of town centre use proposal as they emerge, to ensure that any proposals complement designated centres within the OPDC and its wider hinterland." (My underlining) (Paragraph 10.22).
47	717	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Town centre and community uses	TCC3		Similarly, the Council supports the need for a Retail Impact Assessment for any proposals which include more than 2,500 sq m of town centre uses outside of the Old Oak High Street Major Town Centre.
47	718	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Town centre and community uses	TCC8		Reference should be made within the supporting text, that such assessments will always be required whether or not a "catalyst use" in terms of TCC8.
47	719	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Town centre and community uses	TCC4		We support the approach taken within TCC4: Social Infrastructure. It is essential that the needs of the OPDC area are met in full by new facilities within the area to ensure that there is no drain on the existing social infrastructure outside the OPDC area in RBKC. This should be reflected in Policy TCC4.
47	720	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Town centre and community uses	TCC8		Policy TCC8 is concerned with what are termed "Catalyst Uses." The policy requires the provision of what is termed "a Catalyst Uses Statement" for a use in excess of 10,000 sq m and/or 0.25 hectares of land. Paragraph 10.58 notes that retail and leisure uses can be a form of catalyst use. The Council recognises that this is the case and the important contribution that such a use can have upon achieving the strategic objectives as set out in Table 10.2. However, the Council is concerned that, as drafted, there is no reference within Policy TCC8 or the supporting text, that a "catalyst retail use" must be subject to the impact assessment and other safeguards set out in Policy TCC3. Whilst this would appear to be the intention of the Local Plan, the Council is concerned that a lack of reference could allow future misinterpretation. Confirmation that catalyst uses will be subject to the tests and safeguards set out elsewhere within the Plan is essential if the ambitions of the rest of the plan are to be achieved, and if the vitality of centres outside of the Old Oak area are to be properly considered. A reference to the need of retail development to consider the impact on surrounding town centres within the criteria within Table 10.2 would be all that would be needed.
48	723	Local Authority		LBHF, LB of Ealing and LB of Brent (Joint Response)	Town Centre and Community Uses	TCC4		The OPDC revised Local Plan is evidenced by a number of supporting studies. The Councils feel the plan at present is unsound on the grounds that it is not positively prepared as it fails to set out a robust approach to meeting the need for educational facilities. The Councils

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								are concerned in relation to the use Education and Health Needs Study as a reliable supporting document. This response outlines the Councils' concerns in relation to the evidence and the delivery of infrastructure.
48	732	Local Authority		LBHF, LB of Ealing and LB of Brent (Joint Response)	Town Centre and Community Uses	TCC4	b)	Off site schools are identified in the IDP, the proposed funding mechanism is 'developer contributions/service provider'. The Councils have two concerns in relation to this, those being: - The developer contribution, ie., through a section 106 agreement will not necessarily be enough to facilitate the comprehensive changes that may be required. A contribution from one development for example, may not be enough to deliver an expansion programme. With the tighter restrictions on the spend of section 106 this compromises the Councils' ability to deliver the requirements set out in the OPDC's Education and Health Needs Strategy. - While the expansions are being led by development in the OPDC area, in the usual circumstances local authorities would have the benefit of utilising CIL funding. In these circumstances, where development is causing a requirement in an authority's schools, and there are two separate charging authorities, the local authority should, in conjunction with the OPDC be able to access those funds (once in place) in order to facilitate the timely delivery of infrastructure and the development of the wider OPDC area. Paragraph 82 in the PPG sets out that Charging authorities may pass money to bodies outside their area to deliver infrastructure that will benefit the development of the area. The Councils consider this important in the OPDC progressing with CIL. The Education and Health Strategy sets out trigger points for the delivery of on-site provision and has a number of scenarios based on affordable housing and family housing policies and off-site delivery. It is unclear from the Strategy when the trigger points are for the off-site expansions and how these would be facilitated outside of in response to individual planning applications.
53	787	Local Authority	Nazia Idries	Health and Wellbeing Board - London Borough of Ealing	Town Centre and Community Uses	TCC4		In terms of the social infrastructure section, the response is that the population increase will lead to an increase in referrals for mental health services and this would need to be modelled and included in the commissioning activity of the relevant CCGs (further details in paragraphs below). The same will apply to other providers however the acute Trusts are paid on activity and we are not, uplifts are on demographic growth. It is unclear if this would come through in census data but if not there would be a gap created.
53	788	Local Authority	Nazia Idries	Health and Wellbeing Board - London Borough of Ealing	Town Centre and Community Uses	TCC2		The following highlight the reasons why Ealing PH feel these restrictions are important: • The high level of deprivation in the OPDC Area (PDC Area includes 3 wards: East Acton, Stonebridge, College Park and Old Oak) See IMD in Socio-economic baseline – Old Oak and Park Royal • The worrying level of obesity in Ealing: Above are charts and tables for excess weight for adults and children as a starting point – essentially at reception our rates are fairly comparable our problem comes between reception and year 6 when our obesity and overweight data escalates and one of the many reasons we believe is due to children and young people having food so accessible with empty calories etc. • This policy will support Ealing's HWB Strategy to reduce childhood obesity by supporting its aim to 'try and make children and adults mental and physical health better' and specifically meet priority 3 of the strategy to 'create and sustain an urban environment that helps people to make healthy choices'. This will be supported by the following actions 'of planning, regeneration and urban design to create healthy places to live and use our powers and influence over the wider urban environment to have more healthy food and drink options, especially in areas of high poverty. • The impact of betting shops, pawnbrokers, payday loan stores and games arcades on health and wellbeing is significant and there is evidence to show the link between this. • Since OPDC published the Healthy Town Centres Study, there are two documents that highlight the case for updating the policy: 1. Public Health England (2017) Health matters: obesity and the food environment. - o It highlights the link between deprivation and prevalence of obesity and recommends that "Planning documents and policies to control the over-concentration and proliferation of hot food takeaways should form part of an overall plan for tackling obesity and should involve a range of different local authority departments and stakeholders." 2. National Planning Practice Guidance (NPPG) on health and wellbeing – extract below: 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. Local planning authorities can consider bringing forward, where supported by an evidence base, local plan policies and supplementary planning documents, which limit the proliferation of certain use classes in identified areas, where planning permission is required. In doing so, evidence and guidance produced by local public health colleagues and Health and Wellbeing Boards may be relevant. Policies may also request the provision of allotments or allotment gardens, to ensure the provision of adequate spaces for food growing opportunities. Local planning authorities and planning applicants could have particular regard to the following issues: ▪ proximity to locations where children and young people congregate such as schools, community centres and playgrounds ▪ evidence indicating high levels of obesity, deprivation and general poor health in specific locations ▪ over-concentration and clustering of certain use classes within a specified area ▪ odours and noise impact ▪ traffic impact ▪ refuse and litter
56	934	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Town Centre and Community Uses	TCC2		LBHF supports this policy and the aim of managing development of betting shops, pawnbrokers, payday loan stores and games arcades. There is a comprehensive evidence base of the financial harms, health harms and relationship harms consequent on the availability of these institutions in neighbourhoods. A paper by the Centre for Social Justice links high cost credit to problem debt, and problem debt to mental health difficulties, family

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								breakdown, addiction, worklessness and crime (Centre for Social Justice 2013, page 87). Public Health for LBHF have submitted supporting evidence along with this response at Appendix A and should be considered with this response.
56	935	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Town Centre and Community Uses	TCC2	d)	d) is also supported. The regeneration across the OPDC is going to bring new uses, places and spaces. Development over this area is also going to change and fluctuate and the management of these places is important to mitigate the potential proliferation of hot food takeaways across the new high streets and town centres. LBHF therefore considers this policy to be positive in terms of placemaking, seeking to create sustainable and healthy high streets. This policy is welcomed as it supports the ambitions to make Healthy Choices Easier Choices in LBHF.
56	936	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Town Centre and Community Uses	TCC2	d)i)	This policy is welcomed to support the ambition to change the obesogenic environment to make the healthier choice the easier one. This should lead to an environment which reinforces the promotion of health and supports children to be healthier by reducing the prevalence and appeal of unhealthy options and supporting parents by making healthier choices as easy as possible, reinforcing national messages about healthier eating.
56	937	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Town Centre and Community Uses	TCC2	d)ii)	It is noted that the London devolution proposals suggest that new hot food takeaways should be located outside of 400 metres walking distance of the entrance/ exit of primary schools given the high rates of obesity in years 6 students in London. Given this, you may wish to encourage OPCD to match this ambition by changing the specified distance from 200 to 400m zones of primary schools.
56	938	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Town Centre and Community Uses	TCC2	d)iii)	This policy supports LBHF's ambition with respect to the prevention of hot food takeaway overconcentration in centres.
56	939	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Town Centre and Community Uses	TCC2	d)iv)	This policy supports London's ambition to respect hot food takeaway overconcentration in centres.
56	940	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Town Centre and Community Uses	TCC2	d)v)	It is promising that the plan promotes operating in compliance with the Healthier Catering Commitment scheme as this is one of the recommended actions found in the Local Government Declaration on Sugar Reduction and Healthier Food. However, you may want to suggest the OPCD encourages organisations within its jurisdiction to operate in compliance with the Government's Food Buying Standards.
56	941	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Town Centre and Community Uses	TCC4	a)	LBHF supports this policy and seeking to retain social infrastructure facilities. The development of the OPDC area may present opportunities for change of use and other profitable schemes. The Council therefore is keen that OPDC protects and seeks to support existing community facilities in the area. Suggested change to text: a) i) – could there be further clarification as to what factors are considered to demonstrate there is no longer a need? ii) LBHF supports the 12 month marketing period as an acceptable time frame to understand the market iii) replacement facilities should be of the same or higher quality iv) what are the factors considered to be unacceptable on the residential amenity and/or transport network?
56	942	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Town Centre and Community Uses	TCC4	Para 10.30	As the Council has expressed concern in relation to the reliability of the Education and Health Needs Study, LBHF is concerned that the level of education provision may not be adequate. The Council recognises that school planning is complicated and is likely to change over the plan period, therefore further discussion is required throughout the masterplanning phase and mechanisms are in place to integrate school provision into the planning application discussion.
56	954	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Town Centre and Community Uses	TCC6		Replacement facility should be to the same or higher standard.
56	955	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Town Centre and Community Uses	TCC7		LBHF supports this policy.
68	1057	Community Group	Martin Cain	Friary Park Preservation Group	Town Centre and Community Uses	TCC2		Policy is sound (no justification provided)
68	1058	Community Group	Martin Cain	Friary Park Preservation Group	Town Centre and Community Uses	TCC3		Policy is sound (no justification provided)
68	1059	Community Group	Martin Cain	Friary Park Preservation Group	Town Centre and Community Uses	TCC4		The current planned position for the location of the Secondary school seems to be far from houses.
68	1060	Community Group	Martin Cain	Friary Park Preservation Group	Town Centre and Community Uses	TCC5		Policy is sound (no justification provided)
68	1061	Community Group	Martin Cain	Friary Park Preservation Group	Town Centre and Community Uses	TCC6		Policy is sound (no justification provided)

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68	1062	Community Group	Martin Cain	Friary Park Preservation Group	Town Centre and Community Uses	TCC7		There is no information about public houses
68	1063	Community Group	Martin Cain	Friary Park Preservation Group	Town Centre and Community Uses	TCC11		there is no information on the night-time economy.
69	1076	Unknown	Chris Billington		Town Centre and Community Uses	TCC3		Policy is unsound (no justification provided)
76	1166	Strategic Partner	Colin Lovell	Diocese of London	Town Centre and Community Uses	TCC4		The supporting text to policy TCC4 Social Infrastructure (para.10.30) makes no reference to choice in school e.g faith schools or provision for students with special needs. The London Diocesan Board for Schools is seeing demand for special needs places exceeding supply and demand is expected to continue increasing.
76	1167	Strategic Partner	Colin Lovell	Diocese of London	Town Centre and Community Uses	TCC4		For curriculum planning it is usually better to have an even number of forms of entry for a secondary school. 8FE is therefore rather than 9FE.
76	1168	Strategic Partner	Colin Lovell	Diocese of London	Town Centre and Community Uses	TCC4		There needs to be a mixed economy for nurseries. Commercial providers will want 100 or 120 place nurseries to make a profit. The LDBS has nurseries in its maintained schools which have lower charges than commercial nurseries. Why are only private providers mentioned?
76	1169	Strategic Partner	Colin Lovell	Diocese of London	Town Centre and Community Uses	TCC4		A suggestion for nurseries in maintained schools is that if there is insufficient demand, schools can use the space for other educational uses within the school in a flexible way with rooms returning to nursery when demand reappears.
76	1170	Strategic Partner	Colin Lovell	Diocese of London	Town Centre and Community Uses	TCC4		No mention is made of the Church of England as a major provider of education and of new schools. We have sponsored more schools than West London Academy, for example.
76	1171	Strategic Partner	Colin Lovell	Diocese of London	Town Centre and Community Uses	TCC4		It seems that 4FE primary schools are preferred. These are large schools and large schools carry all sorts of risk. They also need quite a lot of play/social space. It may be that 2FE schools on the lines of Holy Trinity Dalston may provide schools with more of a community feel and the Diocese gives high priority to this. Neighbourhoods need to be created to encourage cohesion and community well-being.
76	1173	Strategic Partner	Colin Lovell	Diocese of London	Town Centre and Community Uses	TCC4	Figure 10.5	Places of worship are included in community uses in Fig. 10.5 under the overall heading of social infrastructure. Although this is understandable it would have been helpful if the OPDC had provided evidence of likely future demand for places of worship. It is simplistic to lump them in with community facilities as they will often require specific and managed 'sacred spaces'. The Diocese appreciates that these issues will need to be addressed at the delivery and implementation stage and through negotiations on individual applications.e.g through the preparation of Infrastructure Delivery Strategies (para. 3.109) It would be very willing to work with the OPDC on this matter.
79	1210	Local Resident	David Craine		Town Centre and Community Uses	TCC2		Consideration. Should be given to the impact on neighbouring town centres.
79	1211	Local Resident	David Craine		Town Centre and Community Uses	TCC9		The main development will not occur until close to 2026. Therefore creative Meanwhile uses building on existing infrastructure are an important priority for OPDC.
81	1215	Community Group	Chloe Fremantle	ArtWest	Town Centre and Community Uses	TCC5		a mix of cultural and leisure uses should definitely exist in the new development, we support that – but this should include workspaces for artists and makers.
81	1238	Community Group	Chloe Fremantle	ArtWest	Town Centre and Community Uses	TCC5	a) to c)	We support this policy (see a)-c)) but wish to bring to the OPDC's attention that if workspaces for artists and makers are not kept within affordable rents then the creatives will be forced to go elsewhere. This will require the OPDC to apply specific policies requiring developers to rent out workspaces at below market rents.
81	1239	Community Group	Chloe Fremantle	ArtWest	Town Centre and Community Uses	TCC5	10.46	We would especially reinforce clause 10.46
81	1240	Community Group	Chloe Fremantle	ArtWest	Town Centre and Community Uses	TCC9	10.66	ArtWest supports this idea and suggests that artists' workspaces be considered for "meanwhile uses".
81	1244	Community Group	Chloe Fremantle	ArtWest	Town Centre and Community Uses	TCC9		any buildings within the OPDC that are not being redeveloped might well be suitable for conversion in to artists and makers workspaces. Some creatives need ground floor access (sculptors, joiners etc.) but others may be located on upper levels.
92	1683	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses			TCC1-TCC11. We support these Policies especially where they support 'Vibrancy' in the Town Centre(s). As we have stated below, we believe that town centres thrive best when there is a broad mix of uses including cultural and leisure facilities and an attractive night time economy.
92	1685	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC4		We agree with the GUA that insufficient attention has been given in the Plan to these matters. In the previous draft 'Social Infrastructure had its own chapter but has now apparently been downgraded to a mere section of this policy. We accept that to an extent some of the detail is covered in the Places section but we consider that safeguarding for social infrastructure needs to be established early on the avoid elements being squeezed out during the development stages. Similarly funding whether it be public or private needs to be secured in principle.

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92	1686	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC4		As the GUA point out, many aspects of current provision of social needs for existing residents are inadequate and need to be considered together with any planning for new residents. We are concerned that the existing social infrastructure for the area is barely coping and in many cases there are either actual or threatened closures.
92	1687	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC4		We would note the following text from the Regulation 18 response: • The local police station in Acton and the fire station in West Action are closing down. • There are existing problems with people being able to register with local GP services without taking into account new people moving in from new developments over the next four years. • That some have to go to Brent to access a GP since they cannot access a GP in Ealing. In Ealing they are building shopping centres rather than considering the infrastructure needs of local people. • Health services are being closed. Ealing paediatrics has become unavailable.
92	1688	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC4		Education: Schools are demanding of space and some safeguarding should be considered now. There are already questions as to whether the with the approvals to date financial provision has been made for primary and secondary schools.
92	1689	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC4		We note from the supporting text 10.30 – 10.31 that the size and nature of primary and secondary schools has been determined based upon the existing housing targets and mix. It should be borne in mind that if these are reappraised as we have suggested, the schools provision will need to be similarly reconsidered
92	1690	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC4		We have not seen any detailed brief for these schools, but the OPDC should insist they conform to the latest Design Bulletins and other guidance prepared by the Department for Education, and that they should include provision for outdoor play/sports space.
92	1691	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC4		The policy is apparently silent on the provision of early years and pre-school nursery provision which also must be considered.
92	1692	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC4		Health: In view of the increase in population, hospital services (Middlesex and Hammersmith), Health Centres, and GP services should be retained and expanded, and any closures of existing facilities prevented.
92	1693	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC4		We note from paras. 10.32 – 10.33 the anticipated provision to provide all facilities in one large hub. We have seen from our experience in Hammersmith that these megaclinics are unpopular with the public, and prefer the suggestion that at least two centres are considered.
92	1694	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC4		Community facilities: We draw attention to our comments earlier about infrastructure and the funding gap. How are community facilities to be paid for? Who will manage them? We presume that in the case of libraries for example OPDC will be the Local Authority responsible.
92	1695	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC4		We support the principle of co-location set out in paras. 10.39 – 10.40, and we are pleased to note that the OPDC recognises the need for retaining flexibility in the provision of social infrastructure facilities as the development progresses and that this will need to be responsive to local demands.
92	1696	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC4		we note that no allowance has been made for religious institutions
92	1697	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC7		It is noted that there are only three existing pubs within the OPDC area. There should be support for new pubs as well as protection of the existing. There should also be resistance to changes of use via Article 4 Directions
92	1698	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC5		TCC5 and TCC6 Culture and Art, Sports and Leisure : TCC8 Catalyst Uses In our Hammersmith Society 'Vision and Objectives statement' in October 2015, we stated the following : "The OPDC is more than the sum of its parts as there are elements of the development which are of wider appeal. This concept was originally identified in Key Objective 3 of the OAPF which stated : 'Potential for large scale catalyst uses such as new educational facility, football stadium, sports complex, health, arts leisure or cultural centre' : This society welcomes the arts, leisure and cultural centres which includes the lido, ice skating, concert hall and general arts facilities". We therefore consider there should be a policy in favour of major catalyst uses such as a museums, a concert hall, or visitor attractions such as a full-size lido or skating rink. For example, where might there be a local cinema?" We welcome that OPDC intend to allow provision for at least 2 swimming pools, and 14 tennis or badminton courts.
92	1700	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC8	TCC9	TCC8: Catalyst Uses/TTC9: Meanwhile Uses. We support the principles of these policies.
92	1701	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC6		We commend and support the excellent 'Cultural Principles' supporting study prepared by the Mayor of London's Cultural Team. We consider that Recommendation 15 of that document should be included, which proposes that the Local Plan requires schemes over 2,500sqm of town centre use floorspace should submit a cultural action plan that sets out how their scheme will contribute to the cultural offer in old Oak and Park Royal.
92	1702	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC6		We cannot over-emphasise importance of inclusion of cultural elements, but these should be for the benefit of local people, Londoners and possibly users of the railway networks rather than as a global ambition.

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92	1704	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC8		We note the potential Science Museum proposal for Car Giant site although its extent is still unclear.
92	1705	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC6		Public art: In addition to contribution to the public realm through S106 agreements, the principle of providing or contributing to public art should also be considered as an obligation.
92	1706	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC10		TCC10: Visitor Accommodation. We have no objections to this policy as set out but question whether the provision will further impact on the overall land supply available and required to meet all the other demands of the Plan.
92	1707	Community Group	Tom Ryland	Hammersmith Society	Town centre and community uses	TCC11		TCC11: Night Time Economy. We support a positive and lively night time economy, including proposals for extended opening hours in appropriate locations away from residential neighbourhoods
100	1998	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Town centre and community uses	TCC9		Policy TCC9 should be applied positively, with recognition that impact of deliverability of Site Allocations (TCC9iii) should not be used by landowners/developers as an excuse to leave buildings vacant and unused for long periods
100	2000	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Town centre and community uses			While we support the aims of this chapter, its realism and hence soundness must be questionable in terms of justification and effectiveness.
100	2001	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Town centre and community uses	TCC2		Policy TCC2 on Vibrancy appears aspirational, with no evidence to date that ground floors can be activated at North Acton despite a cluster of very high density buildings.
100	2002	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Town centre and community uses	TCC2		Policy TCC2 c) seems to be missing a 'not'
100	2003	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Town centre and community uses	TCC2		We support TCC2d) setting conditions for the location of hot food takeaways.
100	2004	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Town centre and community uses	TCC3		Policy TCC3 seeks to protect A class uses, and A1 retail to remain predominant in primary shopping areas. The Plan acknowledges that the boundaries of such areas in places such as Old Oak High Street and Atlas Roundabout are not as yet defined. Seeking to protect A1 and resist other A and D class uses can easily prove counter-productive and lead to multiple vacant units in a single small shopping parade. This has been the experience in nearby North Pole Road W10. The StQW Neighbourhood Plan has introduced a more flexible policy on uses in three shopping parades to the immediate south-east of the OPDC area.
100	2005	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Town centre and community uses	TCC4		Policy TCC4 is supported, albeit that the reality remains that competing demands for S106 and CIL resources, resulting from the very high infrastructure demands at Old Oak, look likely to constrain the provision of adequate social infrastructure commensurate with 24,500 new homes. This is a major concern of local people,
100	2006	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Town centre and community uses	TCC5	E3	On Policy TCC5 we support the evidence and views of ACAVA, that retention of artists and makers in the area is important and for this to happen this policy and those on small businesses will need to be strengthened to ensure that a supply of affordable workspace is provided at Old Oak North and in Scrubs Lane.
100	2007	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Town centre and community uses	TCC8		On TCC8 on Catalyst Uses, the Interim Forum has stated its view, in its response to the Regulation 18 Local Plan, that a major sport stadium is not seen as an appropriate catalyst use at Old Oak. The station interchange at Old Oak South should suffice as a means of bringing people into the area. Whether they choose to stay, to work, shop, or for leisure activities, will depend on the quality of the final development
102	2031	Community Group	Jacky Peacock	Harlesden Lets	Town centre and community uses	TCC3		Harlesden Lets hopes that the Harlesden Town Centre is not affected too greatly by the new development; it is a firm hope that it will complement Harlesden rather than compete and overwhelm the area.
108	2276	Statutory Consultee	Samantha Powell	Education and Skills Funding Agency	Town Centre and Community Uses	TCC4		5. Given the requirement for all Local Plans to be consistent with national policy, the ESFA supports Policy TCC4 (Social Infrastructure) which seeks protection of existing and promotion of new education infrastructure to support growth. The ESFA also welcome the recognition, within the supporting text, around flexibility in predicting need, and support the use of bespoke population modelling to help inform accurate predictions.
110	2574	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC1		This policy is not sound as it is not positively prepared and does not offer effective implementation approaches. 1. In the Introduction to the Chapter and TTC1 no mention is made of the acknowledged need to assess the potential impact of the location of town centre uses on neighbouring designated town centres, as indicated in the Retail and Leisure Needs Study (RLNS, 8.1.10). This expects: “the provision of impact assessments for applications that comprise large-scale town centre uses to demonstrate that the effects on the existing hierarchy of centres will be within the bounds of acceptability and, where necessary, provide appropriate mitigation having particular regard to Harlesden.” 2. The only statement in Chapter 10 concerning the potential impact on Harlesden is made in TTC3(f) A Class Uses and supporting text 10.22 and 10.23. However, this policy and these text paragraphs refer to town centre uses in general and not to A-class uses specifically. The impact on Harlesden concerns issues of vitality, night-time economy, social infrastructure (including churches and pubs), culture and leisure uses, sports and art (reflecting the scope of the RLNS and its various reflections on Harlesden) These general expectations should be relocated to TCC1, and a general statement about the potential for town centre uses and their location to impact on Harlesden should be made at this point. A supporting text outlining the nature of Harlseden town centre, its contribution to meeting the needs of existing

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								residents, and its potential to play a role in and benefit from the developments in the OPDC area, as well as to be potentially negatively impacted by these developments should be made here. The frequency and scope of concern evidenced in the RLNS warrants a specific statement about this so that applicants and readers of this document are aware of the evidence and planning requirements.
110	2575	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC1		The general London Plan aim of “managed growth” for Harlesden should be included here, noting the commitment then of the London Plan to enhance the quality and diversity of shops and to safeguard traditional retail uses (RLNS, p. 33). In addition, local people and many across the city value Harlesden for its distinctive retail offer, including ethnic and minority population shops; the centre therefore performs a wider regional function. Harlesden also offers night-time activities, leisure and entertainment, as well as hosting many community facilities. A clear statement is needed concerning what the potential damage to Harlesden of OPDC development might be across the range of town centre uses, thus in every TCC policy section, and what effective mitigation is required.
110	2576	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC1		Given the distinct overlaps in retail and leisure hinterlands, and the likely functional integration of the existing Harlesden town centre and residents with the northern areas of the OPDC, a stronger consideration and presence of neighbouring areas in shaping the plans for the OPDC area is required, as they will have a material impact, and be strongly impacted by the process of development and the final new OPDC area.
110	2577	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC2		1. TCC2(a)(ii) and Supporting Text 10.10: This is not sound as it is in conflict with policy TCC3(f), which requires the impact of town centre uses on Harlesden to be considered and mitigated (see also TCC9). While the need for flexibility is apparent concerning the significant changes expected in the OPDC area over the lengthy plan period, clear statements are needed regarding the need to review any proposed changes to town centre uses in the OPDC Major Centre in relation to their potential impact on Harlesden. Failure to reassess changing uses, especially their likely scaling up to larger and more permanent town centre uses, will make the policy TCC3(f) [and our proposed amendments to this] fundamentally meaningless. Additional policy text should be inserted, stating that on applying for change of use, assessment of the impact on neighbouring town centres will be required, and planning permission will be subject to that assessment.
110	2578	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC2		2. TCC2 (c) and (d): We support the desire for vibrant and positive town centre uses, but reflect concern that strict controls on uses in the OPDC area as implied in TCC2 (c) and (d) might result in a stronger concentration of such uses in neighbouring centres. This consequence needs to be mitigated against in consultation with LBB and Harlesden Neighbourhood Forum. This should be reflected in the text for 10.13, and should prove a material consideration in assessing impact of planned OPDC developments on Harlesden.
110	2579	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC3		This policy is unsound. It is inappropriately located in this section of the plan as it does not only concern A-class uses. It is not effective as it has no implementation strategy. It is not positively prepared as it does not reflect the OPDC evidence base, the Retail and Leisure Needs Study. The policy does not mention the potential negative impact on Harlesden which is a focus of attention of the RLNS.
110	2580	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC3		1. TCC3 (f): This policy requires a retail impact assessment where more than 5000sqm of town centre uses are provided in OPDC’s Major Town Centre. It is not only concerned with A-Class uses and should be relocated to TCC1.
110	2581	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC3		2. This threshold for assessment of the potential impact on existing town centres (5000sqm of A class uses) does not reflect the advice and analysis contained in the OPDC’s Retail & Leisure Needs Study. Here the quantum of “retail, leisure and office floorspace” of concern to assessing potential impacts on Harlesden town centre, is stated as 2500sqm. There is no foundation at all, either in the NPPF, the RLUS, or in current London Borough practice, for the increased figure of 5000sqm. The Reg 19 plan arbitrarily proposes to increase the threshold for Retail Impact Studies and Harlesden Enhancement Strategies from 2500sqm without justification or evidence. This impacts also on relevant policies in Places (Old Oak S – P1, Old Oak N – P2, Willesden Junction - P11 (f) which should be amended accordingly. And this policy requirement should be reflected also in all P10 places (Scrubs Lane), following our discussion in point 3 below. The RLUS notes that “Specifically the impact of a new major centre on the role of Harlesden will need to be carefully monitored.” (7.6.12). Harlesden is designated in the London Plan “as a medium growth area capable of taking advantage of regeneration benefits” (7.7.3). Physical and functional linkages need to be improved (7.7.4) to enable Harlesden to benefit from the regeneration. But as the Major Centre of OO High Street will operate at a higher level, it will not be in competition. Nonetheless, in relation to Harlesden, the RLNS is clear that they recommend a consideration at 2500sqm: “evidence has assessed the impact of the planned floor space and found it to be acceptable. However, this evidence does recognise that Harlesden could be vulnerable as a centre close to the boundary of the OPDC area. Irrespective of this point, we consider that it will be most at risk from much larger developments and it is not expected that small developments will compete significantly with Harlesden. Therefore, we remain comfortable that a threshold of 2,500 sqm is appropriate.” In relation to the need to produce a Harlesden Enhancement Strategy the RLNS notes, “Trigger for requirement: over relevant impact threshold (see below) [2500sqm], and subject to the OPDC being satisfied there might be competition with Harlesden due to the application’s Location”; this requires consideration that the retail impact of the planned floorspace is addressed, and linkages are in place to secure benefit. The RLNS continues: “Justification and expected contents: for developments that are located in the northern part of the OPDC area and that may compete with Harlesden, applicants should be obliged to provide heads of terms for a potential strategy to ensure that the retail impact of any additional floorspace is adequately addressed and the benefits from linkages are effectively captured.” “Key criteria: the detail of an enhancement strategy should be agreed with the OPDC and LBB prior to submission and should include (but not be limited to) (1) details of proposed linkages with Harlesden, including how this will be delivered and timescales (2) where justified, the scale of potential financial contributions to mitigate impact, including details on what these monies ought to be spent on (for example, public realm improvements, shop front initiatives, marketing strategies)” (p.76) This text from the RLNS quoted above needs to be included in the plan, we suggest at TCC1.

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								Text from 10.23 needs to be moved into policy – and placed together with TCC3 (f) as point “(iii) 2500sqm where the location of the development in the North of the OPDC area indicates it is likely to impact on Harlesden. In addition, a Harlesden Enhancement Strategy will be required when a development in this area would provide over 2500sqm of town centre uses.” There is no indication in the RLNS to suggest that either a retail impact statement in relation to Harlesden or an enhancement strategy should be required at any higher cut-off than 2500sqm. In some cases, notably Willesden Junction and Scrubs Lane places, the evidence suggests it should be lowered.
110	2582	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC3		3. As noted in the plan, the Old Oak High Street will vary significantly along its length of 4.9km (SP6 para 3.49), and we suggest that special consideration needs to be given to retail uses planned for the Willesden Junction Place, Hythe Road, and Scrubs Lane which will be in very close proximity to Harlesden town centre.
110	2583	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC3		As the RLNS notes, in the “northern part of the OPDC area” smaller retail developments could well have a significant impact on the viability of this existing centre and the many small businesses and retail outlets located there. We also note the RLNS observes that the High Street North area will be more focussed on comparison and convenience shopping to serve local residential population (7.5.8). In this regard, the functions of the high street in this area will be very similar to those of Harlesden, and potentially in competition, especially in those areas which are very close (Willesden Junction, Scrubs Lane and Hythe Road). Justification for lowering the threshold for retail impact studies in these focal points of development in the north of the OPDC area can be found in the RLNS which observes in relation to expectations for undertaking a retail impact study, that “a smaller threshold is appropriate where sites are competing with smaller centres” (p. 78). In some London Boroughs, including LBB, these thresholds are as low as 500sqm. In the case of Willesden Junction, Scrubs Lane and Hythe Road, the retail mix will require closer attention at lower thresholds in terms of its impact on Harlesden, which will be a very short stroll away.
110	2584	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC3		4. Implementation: We support here the arguments made by the Harlesden Neighbourhood Forum concerning the policy being ineffective as it has no means of implementation concerning the potential negative impacts of the OPDC development on Harlesden town centre. The concerns re: impacts on Harlesden are not reflected in the policy as such, and the supporting text offers no means of responding to any noted impacts, including those which might accumulate across several separate applications. “The draft Local Plan accepts, in paragraph 10.22, that “there is a need for a greater degree of scrutiny of town centre use proposals as they emerge, to ensure that any proposals complement designated centres”. Consequently, there is a requirement for a full retail impact assessment for those applications that are caught by a relevant threshold in policy. However, there is no policy that requires individual development proposals not to have an unacceptable impact, either by themselves or cumulatively with other developments, upon existing town centres. The mere requirement for an impact assessment provides no safeguard in the event of potential adverse impacts on Harlesden town centre for example. As with out-of-centre development, and because of the potential threats to Harlesden and Ealing outlined in the Retail and Leisure Needs Study, policy should state that where it is likely to have a significant adverse impact on the vitality and viability of an existing centre it will be refused. A clear statement in the policy section should direct that impacts on neighbouring centres are of concern. The need to provide a Harlesden Enhancement Strategy (10.23) should also be in the policy section. Furthermore, if cumulative individual and smaller applications will have a significant effect on Harlesden and other neighbouring centres, provision for an impact assessment across co-located or multiple-site applications should be made. Survey data collected by UCL MSc students along the same lines as the methodology of the Park Royal Industrial Atlas in Harlesden Town Centre indicated that many of these are small family-owned businesses and play a crucial role not only in the vitality of the town centre, but in sustaining livelihoods, income and wellbeing for local business owners and tenants and their families.
110	2585	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC3		This policy is unsound as it is ineffective in relation to implementation.” 5. We also note the Harlesden Neighbourhood Forum concern that the estimates of A class floorspace have increased from earlier supporting studies, but also that they might even so represent an underestimation based on recent planning determinations, which increase the potential negative effects on Harlesden town centre: “An early published version of the RLNS, in February 2016, concluded that there was a threat to Harlesden based on a total new A Class floorspace in the OPDC area of 64,100 sq metres up to 2037. The total new A Class floorspace has now risen to 68,500 sq metres in the latest published version of the Study (Nov 2016). [In addition, the RLNS observes that: “7.4.7 In terms of total A-Class floorspace, the requirement would amount to up 68,400 sqm gross by 2037, increasing to 85,600 sqm gross when the development is fully built out.”]
110	2586	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC3		There is also a separate assessment of what the potential floorspace for town centre uses within the OPDC area is. This suggests, in table 6.11 of the study, that there is potential for a total of 65,250 sq m of commercial floorspace. The Forum has some concerns that the assessment of potential floorspace within the OPDC area may be an underestimate. The estimate is based on urban design work that was undertaken before the first draft plan was published in February 2016. Since then additions appear to have been made to active frontage, as shown in the Places section of the Plan. For example, the High Street has subsequently been extended both east to the Harrow Road at Willesden Junction and west to North Acton from Old Oak Common Lane. Additionally, some clusters show increases in active frontage, e.g., at Scrubs Lane /Harrow Road where it appears that the active frontage has increased from about 150 metres in length to about 500 metres. The total length of active frontage upon which the Retail & Leisure Needs study assessment was made remains the same and is set out in paragraph 6.6.2 of the study. At the very least there needs to be some clarification of how the diagrams and plans showing active frontage are reflected in the estimates of town centre floorspace, otherwise there can be no confidence that the amounts to be delivered will not exceed that proposed. This is important because an extra 350 metres of active frontage at Harrow Road/ Scrubs Lane could result in over 5,000 sq metres of town centre floorspace, which is very significant so close to Harlesden town centre. The aspect of the Plan dealing with locations for town centre uses is considered to be unsound on the grounds that it is has not been positively prepared or justified.” 6. We therefore support the changes sought by HNF:

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								“Policy TCC1 should state that development proposals should not have an unacceptable impact, either by themselves or cumulatively with other developments, upon existing town centres. A more detailed breakdown of potential commercial floorspace by location, including clusters, should be provided.”
110	2587	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC3		7. We cross-reference here policy P11: Willesden Junction Place, which needs special consideration in relation to the potential harmful impact in Harlesden town centre. We especially note the potential impact of the plans brought forward for a new “Place” at Willesden Junction. This envisages a level of development that will be potentially threatening to Harlesden, and implies very high densities of homes and jobs – Land East of Willesden Junction (DCS, p. 45) is estimated to have: 700 dwellings, 400 jobs (8100sq m B1a and B1b space) on 1.6ha, in 6-10 years, with a need for decking or relocation of railway depot and rail lines. This latter constraint on development indicates that the costs of developing this area will be very high and viability constraints might be severe. This will place pressure on developers and the OPDC to bring forward high value commercial developments and high value and high density residential. It will place pressure on the potential to introduce planning conditions related to retail offer. In this case, in regard to retail and leisure uses, the thresholds for consideration of retail impact on Harlesden town centre need to be lowered, and the potential to refuse developments on these grounds clarified.
110	2588	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		It is not justified, positively prepared nor effective. The draft Local Plan does not give sufficient attention and prominence to social infrastructure; and does not ensure that adequate, appropriate facilities have been planned and will be provided. Plan viability and deliverability and evidential justification are in question as the DIF Study of 2015 costed social infrastructure at £191 million, but since then, in July 2016, more facility requirements have been added without the DIF Study being updated.
110	2589	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		Social infrastructure as planned for by OPDC is not comprehensive, e.g. it does not include faith facilities or facilities specifically for children and young people, and lacks precision within policy and certainty over long-term resourcing. • The OPDC policy on play space (D9) focuses principally on open spaces and how these might be designed. While this is important, wider needs of young members of the community (which may be quite different from other community members) also need to be included in consideration of infrastructure needs. It is noted that a number of boroughs now plan for and have dedicated affordable ‘youth zones’ with purpose built facilities for young people including sport, music, dance and creative activities. The Roundwood Youth Centre in Brent is one such example.
110	2590	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		GUA members note that many aspects of current provision of social needs for existing residents are inadequate and need to be considered together with any planning for new residents. We are concerned that the existing social infrastructure for the area is barely coping and in many cases, there are either actual or threatened closures. In response to the regulation 18 Local Plan consultation GUA members highlighted that: • The local police station in Acton and the fire station in West Acton are closing down. • There are existing problems with people being able to register with local GP services without taking into account new people moving in from new developments over the next four years. • That some have to go to Brent to access a GP since they cannot access a GP in Ealing. • In Ealing, they are building shopping centres rather than considering the infrastructure needs of local people. • Health services are being closed. Ealing paediatrics has become unavailable.
110	2591	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		Policy TCC4 (a) would fail to protect a “current use” as “or” between i) & ii) would allow marketing for “alternative forms of social infrastructure”. Where there is no longer an identified use of the facility (a) i), the suitability of premises for other forms of social use (including community ownership) should always be considered. This should be included in the policy. Many of these assets are of strong historical and local value, including distinctive pubs, valued service providers and sports facilities which host important local institutions, such as educational, nurseries, cycling, football and athletics (and many other clubs). For local residents, these are very significant components of their lifetime neighbourhoods and strong contributors to well-being and identity. There is a strong view that these few remaining assets should be strongly protected.
110	2592	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		The limited proposed CIL allocation for community infrastructure was highlighted in responses to the preliminary draft charging schedule.
110	2593	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		Policy TCC4 should provide - an expectation of support for retention of existing social infrastructure (similar to TCC5 (c)).
110	2594	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		Policy TCC4 should provide - an expectation that planning gain will be available to support protection of existing and deliver new social infrastructure to ensure continuity of provision and support for existing and new residents (similar to TCC5(d)).
110	2595	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		Policy TCC4 should provide - Commitment to timely construction of a local list of community and heritage assets in consultation with local residents and groups.
110	2596	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		Appendix A, Fig. A1.8 Local Context does not map all existing facilities within OPDC area to be protected (para 10.25) that are crucial to protect. For example, it omits the Pentecostal City Mission Church with nursery and community rooms etc. (the subject of a current planning application lodged with the OPDC for redevelopment) and NADI Old Oak Common Lane, which has courses for young people, gym and is where the OPDC held a Community Tea Dance earlier this year. - It is key to the effective implementation of this policy that the OPDC knows the full extent and range of existing social infrastructure facilities

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								in order to be in a position to protect them. This must be addressed. The OPDC should work with residents and community groups and local Neighbourhood Forums to ensure there is a comprehensive list and updated Figure A1.8 for social infrastructure that should be protected both in and surrounding the OPDC area.
110	2597	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		Fig 10.8 cited in para 10.37 could not be found.
110	2598	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	D1		D13 (d) envisages supporting community management, without any implementation proposals detailed. This could be explored further in this policy. This should include support through, planning gain funding and collaborative working with the boroughs for the Community Right to Bid, Community Asset Transfer and establishment of development trusts.
110	2599	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		Policy TCC4 is very generalised providing insufficient attention to the issues of health and education. There is little here in the policy on these issues to direct development. We feel these two areas need to be expanded on.
110	2600	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		Health: Great concern has been expressed by community members that the evidence relating to health is unreliable, is insufficiently wide and fails to adequately consider existing needs. Extra pressure on existing services would have a detrimental impact on neighbouring areas rather than bringing benefit. The text of paragraph 10.35 is of concern particularly that on-site facilities may be located on alternative sites if this is agreed by the OPDC and service providers as this asserts uncertainty. GUA members have highlighted that: • Acute care is being concentrated on fewer, bigger A&Es, but recent, current and threatened closures across most hospital services result in large gaps in geographical coverage and longer journey times which the Local Plan does not address. • There are current proposals by NHS Strategic Transformation Plan (STP) for a reduction of beds and services, e.g. at Ealing (the loss of 80% of its beds) and Charing Cross Hospitals (loss of 90%), on top of significant reductions in local hospital services, e.g. closure of maternity at Ealing hospital, the A&E at Central Middlesex, and threats of closing the A&E at Charing Cross. • The OPDC does not seem aware of / has not taken into consideration A&E closures, which could put lives at risk. While there may not be a need for new A&Es, there is a need to stop closure of the existing. • Primary care proposals requested by Clinical Commissioning Groups (CCGs), and their calculations of need (ref 10.32) have been contested by the Federation of GPs and by OPDC Board members (11th May 2017) as impractical and unrealistic, and the desirability of one large centre at the Car Giant site debatable. • Early phases of Local Plan dependent on off-site expansions, by 27 GPs, of existing facilities that are already under strain, then a single expanding health centre growing over time eventually to accommodate 33 GPs. • Not all generations are catered for, including social care needs. • Concerns that in the recently approved Oaklands development - meeting need for health facilities relating to the new development amounts only to delivery of a pharmacy.
110	2601	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		The OPDC must identify sites and ensure development of additional health facilities to meet the need of new communities, prior to or as developments are approved to prevent extra pressure on already stretched resources.
110	2602	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		Education: Existing need must be fully identified and planned for before or as developments occur.
110	2603	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		• Existing schools are already under pressure and there is concern that there is little room for expansion. • The one secondary school at Acton Wells site may prove inadequate given that catchments are dynamic and change over time. • Some children are having to travel to Wembley to access a place at school. • Early years needs require 5 large nurseries but no sites have been allocated.
110	2604	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		There is also concern that Health and Education Needs Study is based on an assessment of school places available in existing schools beyond the OPDC area, including Harlesden Primary School which it is suggested has a current surplus of 303 places. GUA members from Harlesden note however that the School expanded from 1 to 3 forms entry in 2016 – specifically to meet local need. It was anticipated that the additional capacity would not be taken up in total until 2020. It is inappropriate that current capacity should be considered available to meet the needs of the child population from new developments in the OPDC area.
110	2605	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		The OPDC must identify locations or sites that will need the need of new development in appropriate time scales.
110	2606	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC4		GUA members also feel that further and higher education, linked to training and (apprenticeship) employment opportunities must be provided for in policy TCC4.
110	2607	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC5		The policy is not effective. Where there is no longer an identified use of the facility (a) (i), the suitability of premises for other forms of social use (including community ownership) should always be considered.
110	2608	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC5		TCC5 (b) should include 'provide inclusive access in terms of age, ability/ disability and income'.

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
110	2609	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC6		TCC6 (a) should conform with TCC4 (a) and ensure that where there is no longer an identified use of the facility the suitability of premises for other forms of social use (including community ownership) should always be considered.
110	2610	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC6		TCC6 should include an expectation of support for retaining existing facilities.
110	2611	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC6		There should be an expectation that resources, including planning gain, will be available to support protection of existing and deliver new social infrastructure to ensure continuity of provision and support for existing and new residents (similar to TCC5(d)).
110	2612	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC6		TCC6 (c)(i) should add as per addition to TCC5(b) – ability/ disability and incomes GUA members were particularly concerned about the affordable access to sports and leisure facilities issue and about the potential loss of affordable leisure and sports facilities to be replaced by commercial provision (10.50). Policy (a) (i) is not necessarily relevant to existing community facilities provided on a not-for-profit basis, which should rather be supported to continue to provide accessible facilities in the context of proposed new developments. Hostile efforts on the part of potential developers to acquire existing facilities to enable development should be resisted. The OPDC should be more emphatic that the intentions in text paras 10.48 and 10.49 will be delivered through adherence to this Policy. There are also cultural (and gender) sensitivities that should be accommodated (such as gender specific access to swimming facilities); the Mayor is actively promoting London as a diverse and inclusive place. It is advisable that the community should be involved in the planning/design of these facilities.
110	2613	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC6		This policy could draw more effectively on existing evidence bases concerning the objective need for sports facilities across the neighbouring boroughs and wider region, especially for youth and teenagers for whom provision is lacking.
110	2614	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC7		Welcome the attention that this Policy gives to the public houses in the OPDC area, of which there are only 3. These should all be protected for their contribution to social and local life and their architectural expression of community history and heritage.
110	2615	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC7		TCC6 should include an expectation of support for retaining existing facilities. This should include support through resources, including planning gain funding and collaborative working with the boroughs, for the Community Right to Bid.
110	2616	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC8		This policy, notably Table 10.2, expresses the need for proposed catalyst uses to demonstrate how they would strike a balance between viability concerns (meeting housing targets and supporting infrastructure delivery) and ensuring that catalyst uses complement the “wider environment”. GUA members have concerns about catalyst uses which are only episodically used, or which bring heavy footfall and impact occasionally, such as football stadia, which also set severe limits on viability and the capacity to fund social infrastructure and infrastructure. These should not be encouraged. Table 10.2 presents aspects of these concerns under “Quantitative Data”.
110	2617	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC8		Table 10.2 also sets out concerns with the “wider environment”. It would be appropriate to strengthen these concerns by referring to: It does not detract from the quality and use of open and green spaces, leisure and retail functions, as well as active frontages.
110	2618	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC8		Concern is also expressed about the potential development of catalyst uses on the outskirts of the OPDC area e.g. QPR at Linford Christie Stadium. The OPDC should refer to engaging closely with neighbouring London Boroughs, on the basis of a duty to co-operate, to ensure that the quality of the “wider environment”, including green and open spaces, is not negatively impacted by any nearby developments. A policy statement on this should be included to protect the interests of planned OPDC developments, and to ensure that valued assets, such as Wormwood Scrubs, are appropriately protected from excessive and harmful use as a result of neighbouring catalyst uses.
110	2619	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC9		Comments in relation to TCC2 on meanwhile uses and mitigating impacts on Harlesden relate also to this policy.
110	2620	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses			While the need for flexibility is apparent concerning the significant changes expected in the OPDC area over the plan period, clear statements are needed regarding the need to review any proposed changes to town centre uses in the OPD Major Centre in relation to their potential impact on Harlesden. Failure to reassess changing uses, especially their likely scaling up to larger and more permanent town centre uses, will make the policy TTC3(f) [and our proposed amendments to this] fundamentally meaningless. Additional policy text should be inserted, stating that on applying for change of use, assessment of the impact on neighbouring town centres will be required, and planning permission will be subject to that assessment.
110	2621	Community Group	Sharon Hayward	Grand Union Alliance	Town centre and community uses	TCC11		As part of the broader impact of emerging OPDC major town centre uses on Harlesden, the impacts of emerging night-time economy uses in OPDC, especially in the northern areas (Willesden Junction, Scrubs Lane, Old Oak North) need to be considered. Harlesden has a number of valued night-time leisure venues, both longstanding ethnic and migrant related venues, and new opportunities associated with changes in neighbouring areas, with potential for growing links to populations in Kensal Green and opportunities for close links with new Scrubs Lane developments. This issue is of concern to local residents, as declining night-time presence in Harlesden town centre not only affects the viability of businesses but also significantly affects issues of safety, security, and community vitality. A new policy section (e) is needed to require that planning applications for these uses conform to the RLNS requirements to assess the impact of new leisure and retail uses on Harlesden town centre, including the option to refuse applications on this basis (see comments on TCC1 above).

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
116	2806	Community Group	Mark Balaam	West London Line Group	Town centre and community uses	TCC1		We hope that spaces provided under the viaducts linking to the raft will play their part in meeting needs under this Chapter.
120	2865	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Town centre and community uses	TCC1		The draft Local Plan accepts, in paragraph 10.22, that “there is a need for a greater degree of scrutiny of town centre use proposals as they emerge, to ensure that any proposals complement designated centres”. Consequently, there is a requirement for a full retail impact assessment for those applications that are caught by a relevant threshold in policy. However, there is no policy that requires individual development proposals not to have an unacceptable impact, either by themselves or cumulatively with other developments, upon existing town centres. The mere requirement for an impact assessment provides no safeguard in the event of potential adverse impacts on Harlesden town centre for example. As with out-of-centre development, and because of the potential threats to Harlesden and Ealing outlined in the Retail and Leisure Needs Study, policy should state that where it is likely to have a significant adverse impact on the vitality and viability of an existing centre it will be refused.
120	2866	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Town centre and community uses	TCC1		Assessment of the potential impact on existing town centres is contained in the OPDC’s Retail & Leisure Needs Study. An early published version of this, in February 2016, concluded that there was a threat to Harlesden based on a total new A Class floorspace in the OPDC area of 64,100 sq metres up to 2037. The total new A Class floorspace has now risen to 68,500 sq metres in the latest published version of the Study (Nov 2016). There is also a separate assessment of what the potential floorspace for town centre uses within the OPDC area is. This suggests, in table 6.11 of the study, that there is potential for a total of 65,250 sq m of commercial floorspace. The Forum has some concerns that the assessment of potential floorspace within the OPDC area may be an underestimate. The estimate is based on urban design work that was undertaken before the first draft plan was published in February 2016. Since then additions appear to have been made to active frontage, as shown in the Places section of the Plan. For example, the High Street has subsequently been extended both east to the Harrow Road at Willesden Junction and west to North Acton from Old Oak Common Lane. Additionally, some clusters show increases in active frontage, e.g., at Scrubs Lane /Harrow Road where it appears that the active frontage has increased from about 150 metres in length to about 500 metres. The total length of active frontage upon which the Retail & Leisure Needs study assessment was made remains the same and is set out in paragraph 6.6.2 of the study. At the very least there needs to be some clarification of how the diagrams and plans showing active frontage are reflected in the estimates of town centre floorspace, otherwise there can be no confidence that the amounts to be delivered will not exceed that proposed. This is important because an extra 350 metres of active frontage at Harrow Road/ Scrubs Lane could result in over 5,000 sq metres of town centre floorspace, which is very significant so close to Harlesden town centre.
120	2867	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Town centre and community uses	TCC1		There is a discrepancy between the Policies Map and the map in Fig 10.2 of the Town Centres chapter showing the Major Town Centre. The Policies Map shows the town centre designation diverted east to join with Harrow Road whereas Fig 10.2 shows the town centre also forking west past Willesden Junction station to join Station Road. The Forum’s view, as expressed above, is that the town centre boundary should connect with Harlesden at Station Road, and town centre development proposals in the OPDC Local Plan should also reflect this.
120	2873	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Town centre and community uses	TCC4		Paragraphs 10.30 and 10.31 in the supporting text set out the on-site requirements for school provision in the Old Oak regeneration area as well as identifying locations where these schools should be provided, apart from the all through school for which it is indicated there is no need within the Plan period. However the Forum is concerned that if early consideration is not given to the likely location and potential site of the all through school, then as development is brought forward in the area potential locations for its provision may be lost to alternative development, with the possibility that no appropriate site would be available when it is needed. In the Forum’s opinion a site or location for this proposed new school should be identified in the Plan. If a better, alternative option becomes available during the lifetime of the Plan then a review of the Plan to allocate an alternative site would be justified.
120	2874	Neighbourhood Forum	Leo Neto	Harlesden Neighbourhood Forum	Town centre and community uses	TCC4		The assessment of need for school places is based in part on an estimate of school places that will be available in existing schools beyond the Plan area. Table 10 of the Education and Health Needs Study sets out the net additional capacity that is assumed to be available from surplus capacity and expansion projects. One of the schools listed is Harlesden Primary school with a current surplus of 303 places. The Forum is concerned that the current spare capacity in Harlesden Primary School is being identified as being available to meet need within Old Oak. Harlesden Primary School expanded from 1 to 3 forms of entry as recently as 2016. This expansion was necessary to meet local need for new school places identified by Brent. When originally planned, it was not anticipated that the full additional capacity would be taken up until 2020. It is inappropriate that current spare capacity in existing schools outside the area should be considered as available to meet the needs of the growth in child population in Old Oak.

Delivery and Implementation

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
25	208	Agent	Neil Rowley	Savills (on behalf of Osbourne Investments Limited and Quattro Holdings Limited)	Delivery and Implementation	DI3	Figure 11.3	Figure 11.3 shows the 'Shield' site as within public ownership. This is not the case. HS2 has agreed to return the land shown on the attached plan to Osbourne Investments once the railway works are complete.
27	232	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Delivery and Implementation	DI1	a)	It is important that this balance also takes into account site specific circumstances and constraints affecting development feasibility and development viability as this will underpin the ability for development to help achieve successful regeneration. This should be reflected in the policy wording.
27	233	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Delivery and Implementation	DI1	b)	The policy wording should recognise the potential for some developments to deliver benefits-in-kind and where appropriate that such benefits may offset the liabilities and planning obligations listed in the policy. It should recognise the implications that this may impose on development funding and the implications of promoting development early in the regeneration programme. This will help balance competing demands on development viability in the interests of delivering regeneration.
28	293	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Delivery and Implementation	DI.1		TfL considers the delivery of necessary infrastructure to support sustainable growth in the OPDC area as challenging but essential and welcomes the approach that priorities for affordable housing will need to be balanced with the delivery of infrastructure requirements.
28	294	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Delivery and Implementation	DI.2		Old Oak South - Redevelopment of the Elizabeth line depot site is a long-term scheme, and as acknowledged in 11.23b it will be a complex site to deliver which will be beyond the Plan period. It will also take significant resource and investment. References to the Elizabeth Line depot site being delivered as part of the current Local Plan should therefore be removed. However, policies to facilitate this in the longer term will be important, if it is to be feasible. Any future redevelopment on the depot site will need to be both viable and deliverable, which may impact on the end uses that can be provided. The site cannot be considered in isolation and has to work as part of a long-term holistic strategy. To support this longer term aspiration, policies should ensure that proposals for neighbouring sites coming forward in advance of the redevelopment of the depot site should not preclude development of it or sterilise it and indeed where possible create opportunities for its appropriate and comprehensive development.
28	295	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Delivery and Implementation	DI.2	Table 11.1	A list of landowners in Old Oak South is provided but it would be useful to differentiate between freehold and leasehold interests. TfL holds a long lease on the Elizabeth line depot from Network Rail who has the freehold interest.
28	296	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Delivery and Implementation	DI.2	Table 11.1	Any proposals for potential long-term redevelopment that affected other operational rail facilities including North Pole train maintenance depot would need to take account of future operational needs.
28	297	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Delivery and Implementation	DI.2	Table 11.1	Willesden Junction - Potential improvements at Willesden Junction station and in the surrounding area should be informed by the findings of the recent Willesden Junction station feasibility study and will need to be both viable and deliverable. They should take into account the needs of current and future transport operations and involve full consultation with relevant transport authorities and providers.
28	298	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Delivery and Implementation	DI.2	Table 11.1	Any proposals for potential long-term redevelopment that affected operational rail facilities including Willesden train maintenance depot would need to take account of future operational needs. Any de-designation of rail sites would be subject to standard rail industry procedures and consultation.
28	299	Strategic Partner	Lucinda Turner	Transport for London (Group Planning)	Delivery and Implementation	DI.2	Table 11.1	It should be assumed that there will be a need to retain bus interchange and standing facilities on Station Approach at Willesden Junction, although in the long-term if a link suitable for buses is built over the WCML rail tracks, connecting Willesden Junction with the potential Hythe Road station and the Old Oak Common interchange station (such as the proposed High Street), bus standing at Station Approach may no longer be required.
36	484	Statutory Consultee	Juliemma McLoughlin	Mayor of London	Delivery and Implementation			The Plan's policies are generally at the forefront of sustainable design, environmental performance and providing a balanced land use approach. Proposed policy DI1 attempts to balance the demands on the area and the priorities for London as a whole. The text rightly identifies affordable housing as a key priority for the Mayor, and as stated above, land values should reflect this key policy requirement.
42	536	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Delivery and Implementation			It is a long and detailed Local Plan, which risks being unduly onerous by setting out an unusually long list of requirements, criteria and assessments that are required to support development proposals in the OPDC area. Unless these requirements can be further clarified or rationalised, we are concerned that they could go beyond what is required by the London Plan, and more importantly exceed those found in most other Local Plans in London, making development in the OPDC area more burdensome when it should be more streamlined. The Plan's manifesto is change, and so we are keen to work with the OPDC to ensure that this is reflected in the detailed requirements of planning applications;
42	537	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Delivery and Implementation			The Local Plan understandably sets the bar for the quality of new development high, but in doing so it risks, in some places, extending beyond the remit of planning. This includes seeking to control, amongst other things; meanwhile uses and their operators, the relocation of existing tenants, the wages paid by new tenants, the provision of subsidised business and retail space, the control of workspace operators, the distribution of different residential unit mixes, the provision of utilities and the life cycle of materials. Whilst we share many of these aspirations, we are also aware that they will all add to the cost of development, increase the burden of seeking planning permission and potentially delay delivery. As such, we are keen to work with the OPDC to find the right balance, and the appropriate routes and mechanisms, for reflecting shared aspirations in new development; and

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42	538	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Delivery and Implementation			Out of the total 25,000 homes and 55,000 jobs to be delivered in OPDC, the OOP site will provide 6,500 homes and 7,500 jobs – 25% of the homes and 13% of the jobs. This makes it the most significant private development in the area, however the Local Plan is requiring the site to provide a significant amount of social and transport infrastructure which will serve the wider area, including; a 4FE primary school for the whole area, a 4,500sq m health hub for the whole area, a sports and leisure centre including a 25m swimming pool for the whole area and part of a community hub of 5,200sq m for the whole area. In order for these allocations to be acceptable and deliverable, we are of the view that there needs to be a clear acknowledgement of the fundamental viability challenges involved in developing OOP, and how this will influence the level of affordable housing that the scheme will be able to provide.
42	539	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Delivery and Implementation			In summary, we consider that there is much for us to support in the Draft Local Plan, but that there are some key areas where we would welcome further engagement with the OPDC before the document is finalised and adopted. In particular, the Plan's length and detail, the potential for some unduly onerous and unnecessary requirements, and the way in which the Plan addresses the critical cost of infrastructure and the level of affordable housing that is likely to be viable. These matters require some further refinement to ensure that the Plan does not cause delay and discourage development at OOP.
42	540	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Delivery and Implementation			As such, whilst we do not question that the Plan has been positively prepared, we do consider that it is not fully justified in places and that, as a result, some further work is required in order for it to be effective.
42	608	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Delivery and Implementation	DI1	a)	Part a) of this policy is fundamental to the successful realization of the OPDC vision. We would support greater prominence and recognition of this key point throughout the Local Plan, so that the assessment of strategic development proposals against other policies in the Local Plan is undertaken in within this context.
47	721	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Delivery and Implementation	DI3	Para 11.31 and 11.32	As with comments made to Policy EU6: Waste, the following is a joint response from London Boroughs of Lambeth, Wandsworth and the Royal Borough of Kensington and Chelsea. Paragraphs 11.31 and 11.32 of the OPDC Revised Draft Local Plan seeks to summarise the Duty to Cooperate activities undertaken. The paragraphs focus on host local authorities (Brent, Ealing and Hammersmith and Fulham) and other wider sub-regional group meetings but omits details relating to the strategic matter of waste management which impacts on the Western Riverside WPAs. The Paragraphs should make reference to RBKC and the Western Riverside WPAs. In doing so the OPDC Local Plan must reflect the full extent of Duty Cooperate with the Western Riverside WPAs.
55	821	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Delivery and Implementation	DI1		SEGRO acknowledge that due to the locations of both of their sites, they are required for mixed-use redevelopment in order to assist regeneration of the area, however, planning policy needs to be sufficiently flexible to accommodate the specific circumstances of Victoria and Westway. Draft Policy DI1 'Balancing Priorities and Securing Infrastructure Delivery' is included within the 'Delivery and Implementation' Chapter of the Plan. It states: "to support the successful regeneration of the area, OPDC will: a) appropriately balance the priorities for affordable housing, infrastructure delivery and sustainability standards with the needs for deliverability and securing the timely regeneration of the area". Policy DI1a) is supported in this context as it acknowledges the need for balance between policy requirements and delivery. SEGRO suggests that draft Policies P7 and P8 cross reference Policy DI1 in acknowledgement of the challenges which are likely to accompany residential-led redevelopment of the estate sites. Overall, as both estates are currently performing well, it will be important for the Local Plan and any development management discussions/decisions thereafter, do take a positive and pragmatic approach to the planning of residential-led development to ensure that it provides a realistic, attractive and therefore deliverable proposition. In this regard, reference to a minimum number of units is supported, as is the OPDC's acknowledgement of the need for a balanced approach to policy objectives and delivery.
55	839	Agent	Jonathan Stoddart	CBRE (on behalf of Segro)	Delivery and Implementation	DI1		Draft Policy DI1 states: "to support the successful regeneration of the area, OPDC will: a) appropriately balance the priorities for affordable housing, infrastructure delivery and sustainability standards with the needs for deliverability and securing the timely regeneration of the area". We have referenced draft Policy DI1 in relation to the 'Place' chapter policies – see above. In doing this, SEGRO has suggested that draft Policy DI1 is cross referenced within Policies P7 and P8 in acknowledgement of the challenges which are likely to accompany residential-led redevelopment of the allocated SEGRO sites. In addition to this, SEGRO has also considered the relevance and application of draft Policy DI1 in the context of potential commercial development, whether it be wholly commercial or part of a mixed-use scheme. SEGRO notes that, as currently worded, the Policy does not explicitly support a balanced and flexible approach to other Policy requirements, such as those proposed for new employment space. As such, SEGRO suggests that draft Policy DI1(a) is extended to explicitly provide assurances to industrial landowners and developers that pursuing intensification proposals will not be unduly restricted by financial expectations or operational limitations imposed by the Local Plan. Such assurances will be critical to realising the OPDC's objectives for the intensification of Park Royal which, as mentioned above, is already constrained by other commercial factors which are outside the realms of planning policy.
56	956	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Delivery and Implementation	DI1		Bullet POINT a) uses the term 'appropriately' balance the priorities. LBHF is not sure whether this is required, this point is seeking to balance a number of priorities. It is not necessary to include 'appropriately'. Furthermore, the Council is keen to be involved from an early stage of planning applications to work with OPDC to find the right balance. Suggested change to text: Remove 'appropriately'.
56	957	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Delivery and Implementation	11.3		LBHF acknowledges that there are associated costs with development, however, these are essential in delivering the overarching Spatial Vision and bring benefits to the applicant. This balance should be acknowledged in the text.
56	958	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Delivery and Implementation	DI3		LBHF supports this policy. LBHF has worked closely with the OPDC on a number of DtC matters and will continue to be a closeworking partner. LBHF welcome early engagement with OPDC on planning applications; as service provider for a number of areas, LBHF would welcome recognition of this in the supporting text. LBHF also welcomes the post-occupancy surveying. The OPDC area will attract a range of schemes and will continue to develop and

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								change over time, as long as this is not overly onerous for applicants/management companies this will give insight into the success and failures of schemes, relevant for the future determination of schemes.
68	1064	Community Group	Martin Cain	Friary Park Preservation Group	Delivery and Implementation	DI1		Measures to ensure balancing priorities and securing infrastructure delivery seem vague.
68	1065	Community Group	Martin Cain	Friary Park Preservation Group	Delivery and Implementation	DI2		measures to ensure timely delivery and optimised phasing seem vague
68	1066	Community Group	Martin Cain	Friary Park Preservation Group	Delivery and Implementation	DI3		Policy is sound (no justification provided)
68	1067	Community Group	Martin Cain	Friary Park Preservation Group	Delivery and Implementation	DI4		The monitoring and enforcement of planning powers are vague.
70	1091	Local Resident	Joanna Betts		Delivery and Implementation	DI3		There are concerns over the inconsistent commitment of OPDC toward community engagement and communications. Specifically, both community engagement officers have taken sick leave over a 6-week, or longer, period during the consultations for the Local Plan and Old Oak Neighbourhood Forum, with no temporary stand-in organised during this critical period. Although there were engaging workshops, there was no follow up to support the community through the complexities of the consultation response. There have been no consistent newsletters and these are only electronic – sent to people who have engaged with OPDC and who are online. Thus, the OPDC has failed to communicate with the marginalised community members: alienating those that need the most support.
70	1092	Local Resident	Joanna Betts		Delivery and Implementation	DI3		We are also concerned that since the appointment of the new Chair, OPDC has rescinded its offer to work with Ealing Council to act as intermediary between the community and unscrupulous HS2. We are a community in a deprived area with no funding and no legal support and have been left to fight these complex and daunting issues alone.
70	1093	Local Resident	Joanna Betts		Delivery and Implementation	DI3		There are concerns over the damage to the relationship with OPDC following the harsh reduction of proposed Old Oak Neighbourhood Forum boundaries – shrunk to 20% of its proposed size, despite a record number of consultation responses. Overall, these points highlight a lack of sensitivity to existing communities and a questionable commitment to community engagement.
79	1212	Local Resident	David Craine		Delivery and Implementation	DI1		Balancing priorities will be an important challenge.
79	1213	Local Resident	David Craine		Delivery and Implementation	DI2		Improvements to connectivity of Willesden Junction and related development should be a priority, given that this involves improving existing infrastructure.
83	1273	Local Resident	Nadia Samara		Delivery and Implementation	DI3		There are concerns over the inconsistent commitment of OPDC toward community engagement and communications. Specifically, both community engagement officers have taken sick leave over a 6-week, or longer, period during the consultations for the Local Plan and Old Oak Neighbourhood Forum, with no temporary stand-in organised during this critical period. Although there were engaging workshops, there was no follow up to support the community through the complexities of the consultation response. There have been no consistent newsletters and these are only electronic – sent to people who have engaged with OPDC and who are online. Thus, the OPDC has failed to communicate with the marginalised community members: alienating those that need the most support.
83	1274	Local Resident	Nadia Samara		Delivery and Implementation	DI3		We are also concerned that since the appointment of the new Chair, OPDC has rescinded its offer to work with Ealing Council to act as intermediary between the community and unscrupulous HS2. We are a community in a deprived area with no funding and no legal support and have been left to fight these complex and daunting issues alone.
83	1275	Local Resident	Nadia Samara		Delivery and Implementation	DI3		There are concerns over the damage to the relationship with OPDC following the harsh reduction of proposed Old Oak Neighbourhood Forum boundaries – shrunk to 20% of its proposed size, despite a record number of consultation responses. Overall, these points highlight a lack of sensitivity to existing communities and a questionable commitment to community engagement.
84	1300	Local Resident	Nicholas Kasic		Delivery and Implementation	DI3		There are concerns over the inconsistent commitment of OPDC toward community engagement and communications. Specifically, both community engagement officers have taken sick leave over a 6-week, or longer, period during the consultations for the Local Plan and Old Oak Neighbourhood Forum, with no temporary stand-in organised during this critical period. Although there were engaging workshops, there was no follow up to support the community through the complexities of the consultation response. There have been no consistent newsletters and these are only electronic – sent to people who have engaged with OPDC and who are online. Thus, the OPDC has failed to communicate with the marginalised community members: alienating those that need the most support.
84	1301	Local Resident	Nicholas Kasic		Delivery and Implementation	DI3		We are also concerned that since the appointment of the new Chair, OPDC has rescinded its offer to work with Ealing Council to act as intermediary between the community and unscrupulous HS2. We are a community in a deprived area with no funding and no legal support and have been left to fight these complex and daunting issues alone.
84	1302	Local Resident	Nicholas Kasic		Delivery and Implementation	DI3		There are concerns over the damage to the relationship with OPDC following the harsh reduction of proposed Old Oak Neighbourhood Forum boundaries – shrunk to 20% of its proposed size, despite a record number of consultation responses. Overall, these points highlight a lack of sensitivity to existing communities and a questionable commitment to community engagement.
85	1327	Local Resident	Francis, Marc and Caroline Sauzier		Delivery and Implementation	DI3		There are concerns over the inconsistent commitment of OPDC toward community engagement and communications. Specifically, both community engagement officers have taken sick leave over a 6-week, or longer, period during the consultations for the Local Plan and Old Oak Neighbourhood Forum, with no temporary stand-in organised during this critical period. Although there were engaging workshops, there was no follow up to support the community through the complexities of the consultation response. There have been no consistent newsletters and these are only electronic – sent to people who have engaged with OPDC and who are online. Thus, the OPDC has failed to communicate with the marginalised community members: alienating those that need the most support.

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85	1328	Local Resident	Francis, Marc and Caroline Sauzier		Delivery and Implementation	DI3		We are also concerned that since the appointment of the new Chair, OPDC has rescinded its offer to work with Ealing Council to act as intermediary between the community and unscrupulous HS2. We are a community in a deprived area with no funding and no legal support and have been left to fight these complex and daunting issues alone.
85	1329	Local Resident	Francis, Marc and Caroline Sauzier		Delivery and Implementation	DI3		There are concerns over the damage to the relationship with OPDC following the harsh reduction of proposed Old Oak Neighbourhood Forum boundaries – shrunk to 20% of its proposed size, despite a record number of consultation responses. Overall, these points highlight a lack of sensitivity to existing communities and a questionable commitment to community engagement.
87	1374	Local Resident	Patrick Munroe		Delivery and Implementation	DI3		There are concerns over the inconsistent commitment of OPDC toward community engagement and communications. Specifically, both community engagement officers have taken sick leave over a 6-week, or longer, period during the consultations for the Local Plan and Old Oak Neighbourhood Forum, with no temporary stand-in organised during this critical period. Although there were engaging workshops, there was no follow up to support the community through the complexities of the consultation response. There have been no consistent newsletters and these are only electronic – sent to people who have engaged with OPDC and who are online. Thus, the OPDC has failed to communicate with the marginalised community members: alienating those that need the most support.
87	1375	Local Resident	Patrick Munroe		Delivery and Implementation	DI3		We are also concerned that since the appointment of the new Chair, OPDC has rescinded its offer to work with Ealing Council to act as intermediary between the community and unscrupulous HS2. We are a community in a deprived area with no funding and no legal support and have been left to fight these complex and daunting issues alone.
87	1376	Local Resident	Patrick Munroe		Delivery and Implementation	DI3		There are concerns over the damage to the relationship with OPDC following the harsh reduction of proposed Old Oak Neighbourhood Forum boundaries – shrunk to 20% of its proposed size, despite a record number of consultation responses. Overall, these points highlight a lack of sensitivity to existing communities and a questionable commitment to community engagement.
88	1401	Local Resident	Lily Gray		Delivery and Implementation	DI3		There are concerns over the inconsistent commitment of OPDC toward community engagement and communications. Specifically, both community engagement officers have taken sick leave over a 6-week, or longer, period during the consultations for the Local Plan and Old Oak Neighbourhood Forum, with no temporary stand-in organised during this critical period. Although there were engaging workshops, there was no follow up to support the community through the complexities of the consultation response. There have been no consistent newsletters and these are only electronic – sent to people who have engaged with OPDC and who are online. Thus, the OPDC has failed to communicate with the marginalised community members: alienating those that need the most support.
88	1402	Local Resident	Lily Gray		Delivery and Implementation	DI3		We are also concerned that since the appointment of the new Chair, OPDC has rescinded its offer to work with Ealing Council to act as intermediary between the community and unscrupulous HS2. We are a community in a deprived area with no funding and no legal support and have been left to fight these complex and daunting issues alone.
88	1403	Local Resident	Lily Gray		Delivery and Implementation	DI3		There are concerns over the damage to the relationship with OPDC following the harsh reduction of proposed Old Oak Neighbourhood Forum boundaries – shrunk to 20% of its proposed size, despite a record number of consultation responses. Overall, these points highlight a lack of sensitivity to existing communities and a questionable commitment to community engagement.
89	1445	Local Resident	Nicky Guymer		Delivery and Implementation	DI3		TITRA believes that OPDC is not fulfilling DI3 because it chose to close down the Old Oak Neighbourhood Forum's application for designation that would have reached many different communities that are trying to understand the implications of OPDC, HS2 and boroughs' decision-making; instead the OPDC decided to designate a greater-reduced boundary area but even this decision was made unilaterally without reference to the Forum members or residents.
91	1477	Local Resident	Bruce Stevenson		Delivery and Implementation	DI3		TITRA believes that OPDC is not fulfilling DI3 because it chose to close down the Old Oak Neighbourhood Forum's application for designation that would have reached many different communities that are trying to understand the implications of OPDC, HS2 and boroughs' decision-making; instead the OPDC decided to designate a greater-reduced boundary area but even this decision was made unilaterally without reference to the Forum members or residents.
92	1480	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI3		The Hammersmith Society still believe the following are key objectives for the development of the OPDC area: The need for effective community and business involvement in developing the proposals and inhabiting the new development
92	1491	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI1		The whole basis of the OPDC project relies upon the provision of massive new infrastructure. This involves far more than the HS2/Elizabeth Line Crossrail project which is one of the main drivers, and the justification for public funding. The development of the OPDC is the equivalent of a new town but with the added complications of it being in an established brownfield urban area with pre-existing infrastructure that is not necessarily in the right place nor fit for its new purpose. There is also the added complication that much of the existing land is likely to be contaminated involving huge decontamination and remediation costs – something to which there was only a two page reference in the Original Plan, and scarcely any reference in the latest version (Eg. Para 11.10). There is a supporting study document on Contamination but this only sets out principles relating to decontamination and remediation but no costs. OPDC's Development Infrastructure Funding Study gives a total estimate of £1.5billion for the overall infrastructure costs. We find it astonishing that this study and the estimate have not been updated since originally carried out in March 2015 (based on research carried out in 2014). It is set out mainly as a desktop study rather than based upon hard evidence. It is more than likely that the above figure will prove to be an underestimate. The lack of detail and updated information on this issue calls into question whether the Plan is deliverable and effective, and must therefore be regarded as unsound.
92	1492	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI1		It has already been suggested that there is a funding gap in the provision of the new infrastructure, the costs of which will not be achieved by S.106 and CIL revenue, so that it would appear that there is insufficient commitment to the public funding of infrastructure for the area as a whole and that there will be an over reliance on provision from the private sector which probably cannot be realised. In any event, the income from s.106 and CIL will be too late for the funding of the infrastructure works which will mostly need to take place in advance of the developments, thus leading to a funding bridging problem. Our concern is that the expectations for major investment by developers is too high and will affect detrimentally the high quality of development, which we are all seeking in the OPDC project.
92	1708	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI1		We note the statements set out regarding infrastructure and we have already raised our concerns above in respect of 'Infrastructure provision and the funding gap' and again we must express our doubts about the adequacy of the estimate of £1.5bn.
92	1709	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI1		Generally the Plan demonstrates the importance of the resolution and implementation of the infrastructure works, but we are concerned that there is no contingency plan if these are delayed or prove too difficult or expensive.

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92	1710	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation		11.1b	We are concerned at the statement in the supporting text 11.1(b) suggesting that one of the aims should be to 'where possible, exceed OPDC's homes and jobs targets'. Again we have spelt out in some detail are concerns at the unrealistic ambitions for the housing targets and the positive harm this may have in the achievement of all the other laudable elements of the plan due to the excessive densities and heights which would result.
92	1711	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI1		DI 1: Balancing the Priorities and Securing Infrastructure Delivery. The Policy refers to 'appropriate balance' but does not say what is appropriate or how it is to be achieved.
92	1712	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI1		We support the principles set out in Policy DI 1(b) and the supporting text.
92	1713	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI2		DI 2: Timely Delivery and Optimised Phasing. This is an important policy in setting out a draft timetable for the various parts of the site, particularly table 11.1.
92	1714	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI2		The efficient organization and monitoring of this programme will be essential.
92	1715	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI2		We are concerned that the policy is silent on the measures during construction required to keep disturbance to existing communities to a minimum. Similarly it will be essential that social infrastructure elements are co-ordinated as development progresses. This may involve the need for some temporary provisions including screening and landscaping.
92	1716	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI3		DI 3: Stakeholder Engagement and Being a Proactive Planning Authority. This is a worthy policy and we support the notion of 'a proactive planning authority'. However, we are concerned that there is a tendency demonstrated to date for the authority to exceed its authority and run rough shod over both the views of the component local authorities, community groups and individual residents.
92	1717	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI3		As the Local Planning Authority the OPDC has a 'Duty to co-operate' with the other local authorities, and although regular meetings may take place, it is concerning that the OPDC has already pushed through several major planning applications (noted previously) despite objections in particular from the London Borough of Hammersmith and Fulham.
92	1719	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI3		We are disappointed at the OPDC's generally negative attitude to the formation of Neighbourhood Plans, to which the Local Plan merely pays lip service.
92	1720	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI3		Notwithstanding our comments above regarding the lack of formal Community Engagement, we would commend the planning officers, particularly Peter Farnham and Tom Cardis, for their dedication and the professional manners in which they have organised the various consultation workshops.
92	1721	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI3		We must again voice our concern that to date the OPDC has generally either ignored or dismissed comments by the local community and groups such as ours. If the OPDC is genuinely keen to have community engagement, it needs to demonstrate this in its response to the current consultation.
92	1722	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI4		DI 4: Planning Powers and Monitoring. We very much support the principle of pre-application advice (Ref paras. 11.43 – 11.44) but we believe that there should be earlier public consultation which would allow residents and community groups an opportunity to comments before proposals become too fixed.
92	1723	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI4		Similarly we endorse the suggestion that there should be earlier involvement of a Place or Design Review Group but this must be re-constituted as set out previously to involve members of the local community, of whom there are many who are well qualified.
92	1724	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI4		We support the proposals that the OPDC should regularly review its procedures and outcomes and prepare additional planning guidance including SPDs where appropriate.
92	1725	Community Group	Tom Ryland	Hammersmith Society	Delivery and Implementation	DI4		Finally, in view of the many uncertainties around the delivery of longer term plan, it may be sensible for the OPDC to consider producing a shorter term or intermediate plan to cover say 10 years.
93	1749	Residents Association		Wells House Road Residents Association	Delivery and Implementation	DI3		There are concerns over the inconsistent commitment of OPDC toward community engagement and communications. Specifically, both community engagement officers have taken sick leave over a 6-week, or longer, period during the consultations for the Local Plan and Old Oak Neighbourhood Forum, with no temporary stand-in organised during this critical period. Although there were engaging workshops, there was no follow up to support the community through the complexities of the consultation response. There have been no consistent newsletters and these are only electronic – sent to people who have engaged with OPDC and who are online. Thus, the OPDC has failed to communicate with the marginalised community members: alienating those that need the most support.
93	1750	Residents Association		Wells House Road Residents Association	Delivery and Implementation	DI3		We are also concerned that since the appointment of the new Chair, OPDC has rescinded its offer to work with Ealing Council to act as intermediary between the community and unscrupulous HS2. We are a community in a deprived area with no funding and no legal support and have been left to fight these complex and daunting issues alone.
93	1751	Residents Association		Wells House Road Residents Association	Delivery and Implementation	DI3		There are concerns over the damage to the relationship with OPDC following the harsh reduction of probed Old Oak Neighbourhood Forum boundaries – shrunk to 20% of its proposed size, despite a record number of consultation responses. Overall, these points highlight a lack of sensitivity to existing communities and a questionable commitment to community engagement.
95	1801	Local Resident	Mark Walker		Delivery and Implementation	DI3		The OPDC chose to overwhelmingly reject the Old Oak Neighbourhood Forum's application for designation across the Old Oak area. That was a real opportunity missed. This model that would have reached many different communities that are still trying to understand the implications of OPDC, HS2 and boroughs' decision-making to regenerate their area; instead the OPDC has decided to designate a greater-reduced boundary area, but even this decision was announced without reference to the Forum members or residents. That's not behaviour that meets an SCI's needs.
95	1802	Local Resident	Mark Walker		Delivery and Implementation	DI3		It hasn't communicated via print newsletters to households recently – older and disadvantaged people here are not on the Internet and need regular, printed information through their letterbox.
95	1803	Local Resident	Mark Walker		Delivery and Implementation	DI3		Despite OPDC teams working closely with residents on policy suggestions for the plan's different versions, planning applications like Oaklands were pushed approval through without any proper scrutiny by local people – the impression is given that the OPDC absorbs locals'

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								time for ideas but doesn't involve them at all on the 'business end' of planning applications where critical questions over their impact / domination of local communities are likely to emerge
97	1830	Local Resident	Ralph Scully		Delivery and Implementation	DI3		There are concerns over the inconsistent commitment of OPDC toward community engagement and communications. Specifically, both community engagement officers have taken sick leave over a 6-week, or longer, period during the consultations for the Local Plan and Old Oak Neighbourhood Forum, with no temporary stand-in organised during this critical period. Although there were engaging workshops, there was no follow up to support the community through the complexities of the consultation response. There have been no consistent newsletters and these are only electronic – sent to people who have engaged with OPDC and who are online. Thus, the OPDC has failed to communicate with the marginalised community members: alienating those that need the most support.
97	1831	Local Resident	Ralph Scully		Delivery and Implementation	DI3		We are also concerned that since the appointment of the new Chair, OPDC has rescinded its offer to work with Ealing Council to act as intermediary between the community and unscrupulous HS2. We are a community in a deprived area with no funding and no legal support and have been left to fight these complex and daunting issues alone.
97	1832	Local Resident	Ralph Scully		Delivery and Implementation	DI3		There are concerns over the damage to the relationship with OPDC following the harsh reduction of proposed Old Oak Neighbourhood Forum boundaries – shrunk to 20% of its proposed size, despite a record number of consultation responses. Overall, these points highlight a lack of sensitivity to existing communities and a questionable commitment to community engagement.
100	2008	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Delivery and Implementation	DI1		We have major concerns over Policy DI1 and its reference to 'appropriately balancing the priorities for affordable housing, infrastructure delivery and sustainability standards with the need for deliverability and securing the timely regeneration of the area. We consider this policy to be not justified. This policy opens up the Corporation to pressure from speculative developers to push applications through the system, with 'timely' schemes prioritised in a way that is given excessive weight in decision-making. We believe that this has already happened with the applications at Oaklands and along Scrubs Lane.
100	2009	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Delivery and Implementation	DI1	DI2	The results will distort any properly balanced programme of phased development in which social and community infrastructure is built provided in time to serve the needs of incoming residents. Additional pressures will then be placed on local health services and GP practices, already overstretched. The Corporation will be reacting to developers interested in pursuing whatever forms of development are proving most profitable at any one time, with 'timeliness' outweighing other considerations of long-term sustainability.
100	2010	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Delivery and Implementation	DI1		Policy DI1b)4 covers the Corporation's role in working on commercial opportunities for private sector operators (e.g. ESCOS) or public authorities to deliver infrastructure. We suggest that this policy has additional wording where private sector operators are involved in infrastructure on which the public will rely (e.g. energy services, communal heating systems) planning approvals will ensure that future management arrangements have adequate public oversight.
100	2011	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Delivery and Implementation	DI2		Policy DI2 on Timely Delivery and Optimised Phasing, with DI2a setting the Corporation on a course of ensuring development proposals are being brought forward as fast as possible, is a further hostage to aggressive speculative development. Development proposals need to be assessed on their merits for the long-term, without excessive priority being given to early implementation. OPDC targets for affordable housing and for 30% open space will otherwise be lost on the way.
100	2012	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Delivery and Implementation	DI2	Table 1	As noted above, for transparency purposes Table 1 (Page 265) should include information on the size of each housing site, the anticipated density consequent on the housing target shown, and the anticipated range of building heights.
100	2013	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Delivery and Implementation	DI3		On Policy DI3 on Stakeholder Engagement, this policy is not effective. The OPDC has now been operating for two and a half years. Engagement of local people on the Regulation 18 Local Plan was genuinely participative, albeit that venues chosen for workshop sessions were off-putting to the general public and those attending were largely limited to a core of local residents associations. By contrast, public sessions held on the Regulation 19 Plan took the form of 50 minute officer presentations with minimal time for Q&A and little by way of dialogue.
100	2014	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Delivery and Implementation	DI3		The OPDC Statement of Community Involvement (referred to in Policy DI3b) is weak on pre-application engagement compared with other London Boroughs (e.g. Camden). There is no commitment by the Corporation to convening development management meetings with applicants, planning officers, and community representatives round the table at an early stage in the pre-app process. On the few occasions when OPDC has convened a pre-app discussion, this has been at a very late stage in the process and has provided no more input from the public than a standard developer presentation. The SCI refers at 3.12 to planning forums which should be chaired by an independent facilitator and used to improve schemes (a model used in e.g. Hammersmith and Fulham). No such events have yet taken place despite several major applications being determined by the OPDC Planning Committee. We see Policy DI3b as not being effective.
100	2015	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Delivery and Implementation	DI3		The OPDC SCI at 3.4 encourages applicants to consult locally while saying However, it is recognised that pre-application consultation and engagement are not a statutory requirement and OPDC would not be able to refuse planning permission because of inadequate pre-application consultation. A LPA can be more proactive in ensuring effective pre-application discussion, involving local councillors and neighbourhood forums as recommended in the LGA/PAS Pre Application Suite referred to above.
100	2016	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Delivery and Implementation	DI3		Policy DI3c) commits OPDC to supporting Neighbourhood Forums in the development of neighbourhood plans. Given that this is a statutory requirement on a LPA, a policy to this effect is not needed. A policy statement of the OPDC's approach to neighbourhood planning would be more relevant at this point in the document. The Local Plan at paragraph 3.41 states Neighbourhood planning can play a key role in helping to inform the character of these neighbourhoods (see Policy DI3). Were this statement to be used at DI3c it is hard to see how it could be deemed 'effective'. When given the opportunity to designate a neighbourhood area covering all the 'Places' in the Old Oak part of the OPDC area, the Corporation has chosen to remove from the boundary 89% of the area proposed.
100	2017	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Delivery and Implementation	DI3		Policy DI3 commits OPDC to proactively engage with stakeholders. It is not clear from this whether OPDC sees local residents and businesses as stakeholders. Experience in 2016/7 has been that community engagement by OPDC has lacked some of the basics such as a regular newsletter emailed to those who have signed up to receive information. Given the scale of impact of decisions being made by OPDC, HS2, Network Rail, Government departments and others, a regular flow of information is an essential prerequisite of the active participation sought in Policy DI3. As yet there is no evidence that this policy will be effective

OPDC First Revised Draft Local Plan Consultation: List of Representations

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101	2021	Local Resident	Jason Salkely		Delivery and Implementation	DI3		TITRA believes that OPDC is not fulfilling DI3 because it chose to close down the Old Oak Neighbourhood Forum's application for designation that would have reached many different communities that are trying the understand the implications of OPDC, HS2 and boroughs' decision-making; instead the OPDC decided to designate a greater-reduced boundary area but even this decision was made unilaterally without reference to the Forum members or residents.
103	2120	Local Resident	Dave Turner		Delivery and Implementation	DI3		TITRA believes that OPDC is not fulfilling DI3 because it chose to close down the Old Oak Neighbourhood Forum's application for designation that would have reached many different communities that are trying the understand the implications of OPDC, HS2 and boroughs' decision-making; instead the OPDC decided to designate a greater-reduced boundary area but even this decision was made unilaterally without reference to the Forum members or residents.
106	2204	Local Resident	Catherine Sookha		Delivery and Implementation	DI3		There are concerns over the inconsistent commitment of OPDC toward community engagement and communications. Specifically, both community engagement officers have taken sick leave over a 6-week, or longer, period during the consultations for the Local Plan and Old Oak Neighbourhood Forum, with no temporary stand-in organised during this critical period. Although there were engaging workshops, there was no follow up to support the community through the complexities of the consultation response. There have been no consistent newsletters and these are only electronic – sent to people who have engaged with OPDC and who are online. Thus, the OPDC has failed to communicate with the marginalised community members: alienating those that need the most support.
106	2205	Local Resident	Catherine Sookha		Delivery and Implementation	DI3		We are also concerned that since the appointment of the new Chair, OPDC has rescinded its offer to work with Ealing Council to act as intermediary between the community and unscrupulous HS2. We are a community in a deprived area with no funding and no legal support and have been left to fight these complex and daunting issues alone.
106	2206	Local Resident	Catherine Sookha		Delivery and Implementation	DI3		There are concerns over the damage to the relationship with OPDC following the harsh reduction of proosed Old Oak Neighbourhood Forum boundaries – shrunk to 20% of its proposed size, despite a record number of consultation responses. Overall, these points highlight a lack of sensitivity to existing communities and a questionable commitment to community engagement.
107	2269	Residents Association	Mark Walker	TITRA	Delivery and Implementation	DI1		TITRA objects to Policy DI1 which seeks to 'appropriately balancing the priorities for affordable housing, infrastructure delivery and sustainability standards with the need for deliverability and securing the timely regeneration of the area. This policy to be not justified because it leaves the OPDC exposed to pressure from speculative developers to push planning applications through the system, with 'timely' schemes getting undue favouritism in planners' decision-making - as already happened with the Genesis Housing-QPR Oaklands housing development.
107	2270	Residents Association	Mark Walker	TITRA	Delivery and Implementation	DI2		TITRA objects to Policy DI2 on Timely Delivery and Optimised Phasing and DI2a requiring "development proposals are being brought forward as fast as possible" which is another opportunity for ill-considered and speculative development in the area.
107	2271	Residents Association	Mark Walker	TITRA	Delivery and Implementation	DI2		Whilst local people were involved by the OPDC in the previous draft Local Plan, TITRA has concerns over the nature of engagement in for the current version, including: - Lack of discussion of building heights and densities in all these presentations: the OPDC effectively kept residents in the dark about these matters - Specific questions e.g. regarding the Oaklands development have only been discussed by the OPDC's community representative organising one-to-one meetings with officers.
107	2272	Residents Association	Mark Walker	TITRA	Delivery and Implementation	DI3		TITRA believes that OPDC has not fulfilled its Policy DI3b or Statement of Community Involvement with required actions, in various ways.
107	2273	Residents Association	Mark Walker	TITRA	Delivery and Implementation	DI3		The OPDC's rejection of the Old Oak Neighbourhood Forum's application for designation was unhelpful for many very small communities that are simply trying to understand the implications of OPDC, HS2 and boroughs' decision-making.
107	2274	Residents Association	Mark Walker	TITRA	Delivery and Implementation	DI3		OPDC has not fulfilled policy DI3, providing active communications, such as newsletters, to residents. But older and disadvantaged communities that are not online or may struggle to attend OPDC events or Old Oak residents' associations meetings will miss crucial information.
107	2275	Residents Association	Mark Walker	TITRA	Delivery and Implementation	DI3		The OPDC hasn't set up active communications such as: 1) 'round table' development management meetings that could bring together applicants and community representatives to discuss applications early in the process or 2) Planning forums with an independent facilitator (Policy 3.12). As a result, TITRA regards Policy DI3b as ineffective.
108	2278	Statutory Consultee	Samantha Powell	Education and Skills Funding Agency	Delivery and Implementation	DI3		9. The ESFA welcome the detailed evidence base and support the OPDC commitment to engage with infrastructure providers to inform further updates and the subsequent site-wide infrastructure strategies. The ESFA would welcome the opportunity to engage with OPDC on the emerging plan and evidence base, in accordance with published Policy DI3 (Stakeholder Engagement) and the Duty to Cooperate. Please therefore include the ESFA on the list of infrastructure providers with whom you engage to progress the next stages of work on the Plan. 10. As progress on the specific school site allocations is made, the emerging ESFA proposals for forward funding schools as part of large residential developments may be of interest to the Council. The ESFA note reference in Policy DI1 to consideration of potential alternative funding mechanisms and as such we would be happy to meet to discuss this opportunity at an appropriate time.
108	2279	Statutory Consultee	Samantha Powell	Education and Skills Funding Agency	Delivery and Implementation	DI1 DI2		11. One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. The ESFA note and support Polices DI1, DI2 and SP10 which promote CIL and s106 developer contributions, to ensure developer contributions address the impacts arising from anticipated growth. 12. The ESFA would be particularly interested in responding to any update to the Infrastructure Delivery Plan or review of infrastructure requirements, which may inform the OPDC CIL and/or amendments to the draft Regulation 123 list, as well as the future Planning obligations SPD. As such, please add the ESFA to the database for future CIL and SPD consultations.
109	2293	Local Resident	Lynette Hollender		Delivery and Implementation	DI3		There are concerns over the inconsistent commitment of OPDC toward community engagement and communications. Specifically, both community engagement officers have taken sick leave over a 6-week, or longer, period during the consultations for the Local Plan and Old

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								Oak Neighbourhood Forum, with no temporary stand-in organised during this critical period. Although there were engaging workshops, there was no follow up to support the community through the complexities of the consultation response. There have been no consistent newsletters and these are only electronic – sent to people who have engaged with OPDC and who are online. Thus, the OPDC has failed to communicate with the marginalised community members: alienating those that need the most support.
109	2294	Local Resident	Lynette Hollender		Delivery and Implementation	DI3		We are also concerned that since the appointment of the new Chair, OPDC has rescinded its offer to work with Ealing Council to act as intermediary between the community and unscrupulous HS2. We are a community in a deprived area with no funding and no legal support and have been left to fight these complex and daunting issues alone.
109	2295	Local Resident	Lynette Hollender		Delivery and Implementation	DI3		There are concerns over the damage to the relationship with OPDC following the harsh reduction of proposed Old Oak Neighbourhood Forum boundaries – shrunk to 20% of its proposed size, despite a record number of consultation responses. Overall, these points highlight a lack of sensitivity to existing communities and a questionable commitment to community engagement.
110	2622	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI1		This is not effective. The draft Local Plan does not provide evidence to give clarity and certainty on how balancing priorities and securing infrastructure delivery will actually secure affordable housing, decent places, sustainable community facilities as well as the infrastructure necessary to deliver the plan. Much of this Policy simply lists planning financial tools without detailing how they will be applied in an appropriate mix and scale to deliver the benefits and mitigations promised by the Plan; their feasibility is not discussed.
110	2623	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI1		1. The plan is not deliverable as it does not have a coherent financial plan. The Development Infrastructure Funding study (DIF - Supporting evidence document No 50.) indicates an infrastructure cost of £1.549bn, with a gap of predicted income from Section 106 and CIL of £821m accounting for 40% affordable housing. However, this study, published February 2016, largely originated by March 2015, and is now out of date as more needs and development challenges have been identified, for example in supporting documents, such as the education and health study. Furthermore, the Mayor's own review of the OPDC (February 2017) mentions £2.5 billion as the anticipated infrastructural costs, bringing the funding gap closer to £1.821bn. This is hugely ambitious compared to the Mayor's other Development Corporation, the LLDC, which has a funding gap of £63.8m. There is no objective evidence to indicate how the funding gap will be met, as suggested sources are increasingly to be drawn on for council core budgets and possibly unavailable for development (e.g. business rates; borrowing against future business rates). Tax Increment Financing (TIF) – to borrow off the back of predicted future revenue returns - would mean mortgaging the future, to be covered by future generations of tax payers. The capacity to sustain this level of borrowing is unpredictable and imprudent in the face of multiple uncertainties regarding the UK and London economies, as well as additional debt burdens already accruing to the Mayor associated with developments across London (such as Vauxhall Nine Elms) and extensive demands for long term infrastructural renewal (London Infrastructure Plan 2050). The proposals for meeting the funding gap are thus highly insecure and potentially onerous for current and future residents both in terms of a future tax burden, and possible unfulfilled obligations regarding social infrastructure, and quality of environment in relation to this development. Based on the evidence submitted in the DIF, the expectations are that: - (1) S106 and CIL will provide the most reliable throughput of funding and is well evidenced in this plan - (2) Service providers for utilities will recoup costs of provision and infrastructure from customer bills payments - (3) Subsidy for affordable housing (for 30% or 40% affordable provision) – this is not mentioned in DI1 at all, and in the Housing Chapter reference is made to reduced land costs and developer S106 contributions (so element (1) above), as opposed to anticipating any public sector subsidy - (4) HS2/TfL funding: so far this looks most unlikely – TfL are seeking contributions from S106 towards their transport improvements. - (5) TIF – borrowing against future income streams (business rates and CIL). However, business rates are increasingly to be drawn on for council core budgets and possibly unavailable for development; CIL charges have been set very low, we assume to preserve viability and flexibility of income streams through S106 negotiations. There is no evidence that the OPDC development can be funded, except through developer contributions. In this case, huge pressure will be placed on the planning body to respond “flexibly” in order to meet core infrastructure needs, and to significantly undercut the policy commitments of this local plan. We return to this below in our assessment of application determinations to date.
110	2624	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI1		2. The Mayor's own review of the OPDC board (February 2017) is not referred to in this plan, but brings the feasibility of the project even further into question and highlights the inability to meet core policy commitments.
110	2625	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI1		2.1 The funding for the infrastructure needed to bring forward development in the area amounts to approximately £2.5bn and Government expects this to be paid for from development. 2.2. The need for such a level of infrastructure will have an impact on the level of affordable housing that can be delivered within each development – and this will need to be recognised within individual planning applications. Without considered infrastructure investment, future developments will be unable to come forward and Old Oak will not work as a coherent whole.
110	2626	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI1		2.3 Discussions with Government departments about gap funding or other financial contributions to reduce the impact of the infrastructure bill have so far proved fruitless. This is in the context of Ebbsfleet receiving £310m. And Birmingham has received £97m to extend its metro and enhance connections to and from the HS2 Curzon Street station. Birmingham is also benefitting from an expanded Enterprise Zone.
110	2627	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI1		2.4 In addition to impacting on the ability of developments to provide an acceptable level of affordable housing, the high cost of infrastructure may force a quantum and scale of development that is unacceptable in height, scale, density or mass – and at the expense of community infrastructure.” (Mayoral Review of OPDC, February 2017)
110	2628	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI1		3. The feasibility of the policy objectives are also brought into question in the Whole Plan Viability Report. The WPVR (supporting document 50.) notes that commitments to affordable housing can only be potentially met in some sites, and then on the basis of 30% London Affordable Rents and 70% Shared ownership, which does not meet the objective housing need. Flexibility in affordable housing provision requirements and the extreme nature of the infrastructure requirements on this complex, multi-level brownfield

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								site suggests that the plan will not be able to appropriately balance its policy objectives through the only established funding streams of developer contributions (p. 4).
110	2629	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI1		The viability of the plan is also threatened by the lack of central funding or control of any land (unlike the LLDC, for example). Arrangements with public sector landowners to develop Old Oak South are highly precarious, and the Mayor's review of this indicates that the landowners wish to derive maximum benefit from their land, on the same terms as private sector developers. This is confirmed in Policy 3, paragraph 11.27. There also remains the uncertain future of key parcels of land (Crossrail Depot, Powerday and EMR, as well as a number of sites in multiple ownership or where the developer does not wish to develop – the Development Capacity Study clarifies this in detail).
110	2630	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI1		The continuing use over many years of some sites for noisy and non-residential uses and the absence of core social infrastructure provision to support early development not only places pressure on existing residential services and limits the delivery of public benefit from new developments, but also decreases the value of early phase developments, making it more likely that (a) affordable housing offers will be low, and the target markets will not be those in need in the boroughs or London as a whole and (b) that unconventional housing offers, such as co-living, and student housing, will be located in core sites. It places restrictions on viability and S106 income, the only real source of income identified for OPDC, and also potentially limits the take from (relatively low) CIL charges. Early delivery also has significant consequences for the burden of poor air quality on new residents.
110	2631	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI1		4. Evidence from Current OPDC Planning Determinations The GUA are very concerned about the nature of the developments coming forward to date in the OPDC area, and have objected to planning applications on the basis of issues closely related to the limitations placed on development as a result of the overall financial viability of the plan – namely, density, height, affordability, public realm and social infrastructure provision. We have felt deeply upset by the abandoning of key commitments resulting from extensive policy consultations reflected in the Reg. 18 OPDC local plan, for example in relation to sensitive edges to the development. We discuss this further in relation to DI3 and DI4 below and elsewhere in this and other resident's submissions (Old Oak Neighbourhood Forum, Hammersmith Society, Wells House Road). In the early planning determinations we argue that we see the result of the poor financial viability of the OPDC development, driving the planning officers working on early development outcomes to propose higher buildings, more dense developments, and to accept a low affordable housing offer. All this seems to be driven by OPDC income and delivery calculations in the face of an unrealistic, unviable and ineffective financial plan. The following table sets out the breakdown of housing units determined to date within the OPDC area and demonstrates the current under achievement of affordable/social rent units despite initial lower infrastructure requirements for these sites than others still to come forward. Mayoral contributions to “affordable” (intermediate, shared ownership) housing, have already had to be made directly to developers to be able to claim levels of affordable provision compatible with political commitments. (OPDC INTERNAL NOTE: REFER TO TABLE IN RESPONSE)
110	2632	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI1		In addition, we can note on the basis of analysis of the OPDC planning determinations to date the very low levels of public space provision, low and often highly ineffective contributions to social infrastructure (e.g. one small unit for a “health facility”, which cannot accommodate actual practitioners and has reverted to a pharmacy; limited extension of educational provision when local schools are extremely oversubscribed; reliance on Wormwood Scrubs as a site for provisioning older children's play areas when there is a shortage of open and play spaces in Harlesden). Our comments below on early phase developments in North Acton and Scrubs Lane are relevant.
110	2633	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI1		5. Failure to assess alternatives Given the scale, nature and complexity of the development strategy, it is of great concern that it has not been subjected to full application of the required sustainability procedures, which are essentially that: “The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal.” (Requirements for Soundness, Planning Advisory Service). But the assessment of the overall OPDC plan, and of strategic options, is not to be found in the IIA, only alternatives for individual policies, such as the Affordable Housing Policy. Given the significant (and indeterminate) costs, funding gap, and weak social outcomes achieved in planning applications determined to date, this IIA should be redone, considering reasonable and realistic alternative development scenarios for the OPDC area.
110	2634	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI1		We point out that the GUA objected to the lack of consultation in relation to the preparation of the IIA Scoping Report. At the time the GUA observed that the local residents had not had the opportunity to propose “community-based realistic alternatives” for the Reg 18 Local Plan. The OPDC has a “Community-Based Vision and Objectives” which should inform assessment of alternatives to the current OPDC Reg 19 local plan. This is submitted together with this consultation response.
110	2635	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI2		This policy is not positively developed or effective, and is therefore unsound. It results in outcomes which are at odds with other policies in the plan, including affordable housing, social infrastructure, heritage and air quality.
110	2636	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI2		Policy DI2(a) We are especially concerned with DI2(a) (linked to SP10) which seeks to bring forward development as early as possible to meet the targets for housing and jobs, and to build confidence in the development. We feel that excessive attention to early development is also being encouraged to meet financial and infrastructure delivery targets. It is far from clear that early delivery is ensuring the full range of required benefits or contributing to wider infrastructure and sustainable development criteria; and a number of significant barriers to development remain to be overcome in relation to some key sites. Furthermore, the negative aspects of early development are not mentioned in the plan, and represents a selective presentation of available evidence. This concerns the likely lower valuation of land due to co-existing and unpleasant uses (e.g. DCS, 1.45 on the value effects of current uses and implications on financial flows). Early delivery therefore does not maximize the potential for achieving good policy outcomes through OPDC income streams (and causes defective policy outcomes through balancing priorities). More than this, at a human level such

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								lower valuation also reflects poor living conditions for new residents, including noise, poor air quality, traffic congestion, extremely limited public transport provision. The IIA notes: “Going Local Narrative 3: benefits from early development The narrative seeks to capture and generate benefits from early development for local people. This will positively benefit IIA objectives in relation to place-making, social inclusion and promoting economic investment and encourage investors to develop in the area. The description text does not provide much information so it cannot be certain that this objective will have other positives against other IIA objectives”. (p. 57) However, contrary to this positive assessment, phasing for early development under conditions of low viability has placed pressure to increase densities, raise heights to levels which intrude on existing development and threaten the quality of heritage assets, to diminish public space offers, push play spaces to roofs, and rely on non-public, communal and private spaces to fulfil open space planning requirements. Affordable accommodation provision has been very low, and largely limited to intermediate rents and shared ownership offers (see Table above). Overconcentration of student accommodation at North Acton has already resulted in significant overcrowding on trains – without the delivery of transport improvements, permitting developments as if they had the highest possible PTAL levels (for inner London) many years before such transport improvements come forward leads to transport and traffic bottlenecks and overcrowding, notable already at North Acton Station and anticipated on already jammed roads such as Old Oak Lane and Scrubs Lane when the currently approved developments are brought forward. This comes at a time when increased construction traffic from HS2 is expected, and already overcrowded and highly polluted roads will become even worse (as the Air Quality Study predicts). Residents and GUA members have made extensive comment on these issues in consultations on specific planning applications – with no effect at all. We discuss this in relation to policy DI3.
110	2637	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI2		Specifically, we can note that early development of dense high rise residential accommodation adjacent to continuing heavy industrial uses, such as waste recycling, in areas of significantly poor air quality places a large number of new residents in potentially life-threatening situations. In Supporting Document 4, the Institute of Air Quality Management is quoted as recommending that “new development should be designed to minimise public exposure to pollution sources” (p. 60). However, the key early development phase of Scrubs Lane, for example, is in a high NO2 pollution area (above 40ug/m3). While existing methods do not indicate high particulate matter, modelling of particulate matter does not include pollution from industrial sites, and existing planning applications documents also note that stationary vehicles are not modelled (p. 53). Waste-bearing heavy goods vehicles largely diesel – at the rate of over 1000 per day – populate these sites of early development (notably Scrubs Lane and Channel Gate). Exceedances are highest on the ground level (play spaces) and rooftops (heating systems). A recent planning application required habitable rooms to be permanently closed with mechanical ventilation to reach acceptable pollution levels; the play spaces receive no such protection implying that the residents most vulnerable to air pollution – young children – will be most exposed. The planning guidance referred to indicated that noise exceedances in some urban developments are inevitable. However, all developments in these areas will be contrary to the Mayor’s noise and air quality policies and ambitions. Serious reconsideration needs to be given to the viability and public health impacts of such early developments.
110	2638	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI2		In addition, we can refer to the approval of tall buildings on the sensitive edges of the OPDC area – sensitive for existing residents, and in relation to heritage assets. English Heritage has opposed these developments along with residents. Here, justifications given by the plan for high buildings do not reflect design or policy-led criteria, but the demanding financial, infrastructural and housing targets set by the untested overall quantum of development set for the OPDC area in the London Plan and the lack of financial viability of the plan as a whole. Thus, in relation to the early development place of Scrubs Lane, the Table in P10 outlines the rationale for one tall building on each site as being to provide legibility (explained elsewhere as marking the edges of the OPDC area and supporting wayfinding – in place of maps?) and to secure additional benefits. We suggest that the design quality and way finding arguments given to justify tall buildings in this context are spurious, and were reversed from Reg 18 to Reg 19 versions. The provision of a higher quantum of housing, and the extraction of developer contributions (“secure additional benefits”) provides the overriding justification for intensifying development which does not meet design and other criteria to the long term detriment of the neighbourhood. Nonetheless, these developments are still not delivering on the public, open space and social infrastructure expectations of policies in this local plan. Many other issues along these lines could be raised based on evidence from already approved planning determinations which indicate that “balancing the priorities” across the plan is not delivering outcomes consistent with this plan’s policies within the financial envelope proposed here, and is therefore ineffective and unsound.
110	2639	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI3		This policy is unsound as it’s engagement strategies in relation to delivery are ineffective in positively influencing plan delivery.
110	2640	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI3		Engagement in planning applications is important for residents’ groups, given that the overall shape of the Local Plan is a developer prospectus, in which all priorities are in question (to be “balanced”) and delivery relies on developer contributions. The early delivery along Scrubs Lane reveals the financial pressure shaping poor outcomes which will affect our daily lives for decades, and exemplifies the challenges facing stakeholder engagements including community participation in relation to delivery specifically. Given the scale of development which is forthcoming, and the challenges of financing the planned scale of development, the scope for resident participation in delivery needs to be significantly expanded to ensure that harmful outcomes can be avoided and to contribute to delivering good outcomes for the new part of the city we will be living in. In this case we value the acknowledgement that local people are experts in planning their areas (11.34): this needs to be followed through more effectively if it is to shape planned delivery in the OPDC area. The Policy overall indicates a commitment to: “encourage active participation in the planning and delivery of development in the OPDC area”.
110	2641	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI3		Policy D1 (a)’s “balancing the priorities” approach will have significant impacts on the development outcomes. However, community voices are not being heard or are seemingly discounted in the planning determinations to date. The policy objectives and intentions of Policy D3 (a) and (b), text paras 11.34 and 11.35 are not being met. A stronger and more targeted approach is required with key commitments to transparency and responsiveness to community concerns with developments.

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110	2642	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI3		In relation to “planning”, GUA members have been positive about the processes of consultation concerning the OPDC Reg. 18 local plan. And note the open events for information and questions in relation to this Reg. 19 local plan. They also note however that the timing of the consultation (over the summer break) and staff shortages during the consultation period for this plan meant that a limited amount of engagement took place.
110	2643	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI3		In relation to “development”, the process of participation for residents is far from acceptable. The GUA welcome the SCI and the consultation process on that, which encourages good practice amongst developers in relation to early consultation on their proposed plans. However, this has been presented in a very brief format for the Reg 19 consultation and does not present the range of concerns which were raised during the consultation and presented in draft form.
110	2644	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI3		Furthermore, important expectations which were set in the draft SCI have not been met, such as the Development Management Forums which were meant to be held at an early stage in the development application process and which would, amongst other achievements, allow for community input in the presence of officers. And high standards for developer consultations established in the early and current drafts of the SCI have certainly not been met. Most developer consultations are perfunctory, and rather late in the process, although at least one major developer has responded positively to the expectation of early and sustained engagement expected of participation in planning decision-making with some consequences for the plan making process. We would welcome stronger expectations of consultation and clear scope for early responses to resident’s expressed concerns. Our view is that the legal precedents established in the Gunning Principles on ‘fair consultation’, endorsed by the Supreme Court in 2014 (R (on the application of Moseley (in substitution of Stirling Deceased)) (Appellant) v London Borough of Haringey (Respondent) [2014] UKSC 56) and requiring early consultation should be clearly affirmed in the SCI and should be referenced in the Local Plan to mandate early and effective participation in deliberations on development – on “balancing the priorities”. We suggest that applicants should be required to submit a response to local resident’s concerns early in the pre-application discussions so they can have a material effect in shaping the plans and so officers who are exploring options with developers can be made aware of community concerns. In addition, officers should seek to inform themselves of community concerns and represent these in their negotiations with applicants concerning how priorities might be balanced in the particular development they are concerned with. Open engagement with the reasoning behind certain calculations of priorities might be expected, if public participation is to have any meaning at the delivery stage. The statement in the SCI is clear on this: “5. Early involvement a) Arrangements should be made for the community involvement process to begin at the early stages of a plan or development proposals process. This should occur before issues such as the height and scale of development are fixed when significant options are still open and while there is still the potential to make a difference to the plans.” We would like to see this text included in the local plan, DI3 to strengthen its application. However, we would like to see the OPDC make their own commitment to consultation on specific proposed developments as currently discussions between the OPDC and developers reach a very advanced stage over a long period of time, with no clear lines of influence from community views to officers’ inputs to the design and viability discussions. We do not see mention of the innovative “Planning Forums” which the OPDC was hosting for some developer applications which might have been one way for officers to hear of community concerns. How, for example, can officers be informed of residents or businesses desires to protect local assets, prior to negotiating that away to secure a piece of road?
110	2645	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI3		GUA members have been exceedingly exercised by the poor outcomes, and the limited consideration of their concerns in the delivery process. Residents, for example, submitted multiple objections to the height and density, public space provision and design elements of the first OPDC determination, brought forward by Genesis and QPR. Here the “priorities” were balanced in the following way (as far as we can make out): - During the planning committee, the presenting officer noted that the financial contribution towards the provision of educational facilities was falling short of the required amount to (quote) “offset the full educational impact of the scheme” 13/7/16. However, the contribution was deemed acceptable for two reasons. First, contributing more would render the scheme unviable. Secondly, this lacunae was downplayed on the ground that the scheme is making a major contribution to the regeneration of the area through the provision of a new road. The delivery of the Genesis road was repeatedly mentioned as forming part of the planning gains during the planning committee discussions. The OPDC is highly reliant on the developers for the transport infrastructure delivery as it does not receive a public budget to this effect. Transport infrastructure is costly and the prioritization of this type of community benefit result in an erosion of the amount of S106 remaining to finance social infrastructure such as community centers and schools. The risk is that in other forthcoming schemes a disproportionate share of the section 106 is allocated to transport, leaving a gap in social infrastructure funding. In the Genesis scheme case, reference was made to public funding to top up the developer’s contribution towards schools; however, no clear stream of funding was mentioned. Over time, the cumulative choices against delivering social infrastructure will very negatively affect existing and future residents. In this case presented here, the developers’ SCI concluded that there were no objections to their development – despite multiple concerns being brought forward by communities. These were invited too late in the day to have any effect whatsoever, as by that time the developer and OPDC officers had agreed on the terms of the development. Compared with other stakeholders, community groups have very limited opportunities for engagement in delivery planning processes, which often go on in repeated pre-application meetings for more than a year. Together with our elected officials (who are outvoted on the OPDC planning committee and board or who are consulted late in the day in the case of MPs), we are unable to have any effective influence on outcomes. This is shaped by the limited information available as the development progresses. By the time the issue is sent out for consultation, or heard before the OPDC Planning Committee, the officers concerned have already determined the grounds of the case together with the developer, and residents’ concerns have no impact. This does not represent effective or adequate participation.
110	2646	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI3		Information on pre-application discussions between OPDC and developers, which includes other stakeholders, providers and decision-makers, is mostly published along with the planning application submission, as are some viability assessments. We regard this as good

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								practice and would like to see a policy statement confirming this open book approach to design and viability discussions in DI3 to ensure this continues as good practice and applies to all developer applications.
110	2647	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI3		However, this is far too late for any effective participation to influence outcomes. Limited effectiveness of engagement results and the impact of community concerns in relation to developer applications is negligible – there is certainly a need for open book approaches, and transparency of S106 discussions, but these need to be aired in advance of the conclusion of pre-application discussions, in order for informed engagement on development options to take place.
110	2648	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI3		Without an effective approach to public engagement in relation to delivery as well as planning, the “balancing of priorities” across this plan will not meet policy expectations. Current evidence on applications to date suggests that this will systematically disadvantage local existing and new residents.
110	2649	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI3		Currently this policy is unsound as it has absolutely no indications as to how it can be delivered. There is a need for clarity on how Neighbourhood Forums, community ownership/management will be supported – initiated, funded in order to endure – and how community involvement can be sustained. However, reference in the text para 11.37 of the Diocese of London’s The Engine House as a model is welcomed, but how this can be emulated and quite what the level of support that would be forthcoming is not explained in this era of diminishing local authority resources and services. Another example is a Canoe Club at City Road Basin, Islington which is understood to have been granted leases from the surrounding development as an income stream. These references are helpful and interesting to residents’ groups. However, to run social infrastructure, the capital income to set it up and ongoing income to keep it going is needed. An explicit statement on the willingness to support such considerations in relation to the use of S106 and CIL funds from particular developments is required. For example - the canoe club at City Road Basin was negotiating to get a long lease in a high-rise development – providing a flow of income to fund their activity. Could something similar be reproduced here? A developer could contribute x amount of office space to the community, for example, for a certain period (perhaps as an interim use) and revenue could be used to pay for their activities. We would recommend exploring whether this kind of arrangement could be secured as a planning condition? This might open up opportunities for protection of community assets, and provision of new elements of community based infrastructure. A financial proposal is essential here, as sources of funding for social infrastructure are very limited indeed, especially since local authorities don’t have the finances to offer grants or sustain facilities. Similarly, in order to be considered meaningful and sound in planning terms, positive statements regarding support for Neighbourhood Forums also should include the need to be mindful of the potential for financial flows from the overall development through the share of CIL entitlements to be directed to enabling the neighbourhood plan implementation. We are opposed to top-down determination of neighbourhood forums’ delimitations, and request that a form of words to require a commitment to respectful working with local forums, and openness to ensuring that the required income streams for enacting the local plan are provided through sensible and negotiated border delimitations.
110	2650	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI4		Intrinsically linked to monitoring impacts is the essential prerequisite to first fully understand the scale and nature of likely impacts. While it is acknowledged in the IIA that the proposed development will have a significant impact on existing residents and surrounding areas, the impacts and considerations of the loss of businesses, loss of trade, loss of access to services, loss of quality of air and environment, due to the proposed development, are inadequately set out. Significant benefit will accrue to private developers and may ultimately to the OPDC and to the public bodies holding land in the area. This benefit should be used to explore ways to address the significant dis-benefits which displaced businesses, enterprises and impacted residents will experience.
110	2651	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI4		To a limited extent, this acknowledgement of considerable impacts and ways to mitigate and compensate for impact on local residents and businesses are explained in the IIA and Plan. The following from the IIA narrowly frames the Plan’s response to construction related considerations. “However, such a volume of development will not be without its challenges. The existing transport network, businesses and residents will be impacted by with a significant amount of change in their area over a long period of time. This natural conflict is acknowledged within the Local Plan policies, and addressed with specific policies aimed at ensuring proposed development can adequately deal with effects on residential amenity including noise, air quality and construction impacts.” (IIA, Study no.27, p. v) The degree of adequacy and soundness of the Plan in dealing with such construction impacts are the subject of detailed critical commentary elsewhere. As to mitigations and how the plan-making process has dealt with their generation, the IIA as published remains incomplete. The IIA on p52 notes on mitigation that: “Where appropriate, mitigation measures are recommended to avoid, reduce or offset the potential adverse impacts as a result of the Local Plan. In addition, potential opportunities to benefit and enhance the social, economic and environmental receptors are identified. Recommendations within Appendix G are italicized for clarity. As the Regulation 19 Draft Local Plan has been developed in parallel to the SA process, mitigation measures have been incorporated on a continual basis into the Local Plan.” Appendix G is missing from the papers presented to the OPDC Planning Committee which signed them off for Board approval of the draft for public consultation. This not been remedied as it is missing from the document subjected to public consultation.
110	2652	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI4		Monitoring Impacts: KPIs The range of Key Performance Indicators (KPIs) is separate from the Local Plan, in a supporting evidence document, disconnecting the Plan from the monitoring process. The proposed KPIs for these aspects of the Plan are inadequate. There are IIA Objectives whose effects are recommended to be monitored, but which are not reflected in the KPI, or at best partially or superficially dealt with. In particular, for the Objectives to: “Maximize the health and wellbeing of the population, reduce inequalities in health and promote healthy living; to improve the education and skills levels of all members of the population particularly vulnerable groups; maximize the social and economic wellbeing of the local and regional population and improve access to employment and training”. (p 85- 87).

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110	2653	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI4		Equality and fairness based monitoring of impacts on residents is weak or missing. Monitoring targets do consider, for example, net gain/loss (jobs, A-grade office space etc) which will incorporate something of the changes, but monitoring of the wider impacts of the development on surrounding residents, and boroughs in terms of inequality, health impacts, employment impacts, housing impacts, are not considered and should be monitored. For example, for the IIA Objective “Increase community cohesion and reduce social exclusion to encourage a sense of community and welfare”, possible indicators are: “Number of offices converted to residential under permitted development rights; Schemes to reduce the impact of construction on the local community; Connectivity of pedestrian linkages across the area - Targets to be developed”.(IIA p 85) Which residents lose jobs, and who gains jobs, for example, (or businesses) will have equality and fairness implications and should be monitored (see comments on Policy E1). This is made all the more necessary with the Mayor’s direction of travel for London in ‘A City for all Londoners’ for a fair and just city which are being manifested in the draft Diversity & Inclusion Strategy; with many relevant values to likely figure in the new London Plan.
110	2654	Community Group	Sharon Hayward	Grand Union Alliance	Delivery and Implementation	DI4		Applicant Expectations The text in 11.43 should be modified as it represents an unsound approach, inconsistent with other policies and thus will be ineffective. 11.43 “For major applications (delete ‘for major applications’) As part of the pre-application process....” The cumulative scale of the development is such that all applicants should engage in community engagement. In addition, given the location of many smaller pieces of land adjacent to existing and continuing uses, the smaller applications may be the most significant in terms of community concerns. Without this change, the nature of planning and delivery deliberations will not meet the expectations of community participation set out in DI3 (a) and will be in contradiction with the SCI.
111	2669	Local Resident	Jeremy Aspinall		Delivery and Implementation	DI3		There are concerns over the inconsistent commitment of OPDC toward community engagement and communications. Specifically, both community engagement officers have taken sick leave over a 6-week, or longer, period during the consultations for the Local Plan and Old Oak Neighbourhood Forum, with no temporary stand-in organised during this critical period. Although there were engaging workshops, there was no follow up to support the community through the complexities of the consultation response. There have been no consistent newsletters and these are only electronic – sent to people who have engaged with OPDC and who are online. Thus, the OPDC has failed to communicate with the marginalised community members: alienating those that need the most support.
111	2670	Local Resident	Jeremy Aspinall		Delivery and Implementation	DI3		We are also concerned that since the appointment of the new Chair, OPDC has rescinded its offer to work with Ealing Council to act as intermediary between the community and unscrupulous HS2. We are a community in a deprived area with no funding and no legal support and have been left to fight these complex and daunting issues alone.
111	2671	Local Resident	Jeremy Aspinall		Delivery and Implementation	DI3		There are concerns over the damage to the relationship with OPDC following the harsh reduction of proposed Old Oak Neighbourhood Forum boundaries – shrunk to 20% of its proposed size, despite a record number of consultation responses. Overall, these points highlight a lack of sensitivity to existing communities and a questionable commitment to community engagement.
113	2699	Local Resident	Thomas Dyton		Delivery and Implementation	DI3		There are concerns over the inconsistent commitment of OPDC toward community engagement and communications. Specifically, both community engagement officers have taken sick leave over a 6-week, or longer, period during the consultations for the Local Plan and Old Oak Neighbourhood Forum, with no temporary stand-in organised during this critical period. Although there were engaging workshops, there was no follow up to support the community through the complexities of the consultation response. There have been no consistent newsletters and these are only electronic – sent to people who have engaged with OPDC and who are online. Thus, the OPDC has failed to communicate with the marginalised community members: alienating those that need the most support.
113	2700	Local Resident	Thomas Dyton		Delivery and Implementation	DI3		We are also concerned that since the appointment of the new Chair, OPDC has rescinded its offer to work with Ealing Council to act as intermediary between the community and unscrupulous HS2. We are a community in a deprived area with no funding and no legal support and have been left to fight these complex and daunting issues alone.
113	2701	Local Resident	Thomas Dyton		Delivery and Implementation	DI3		There are concerns over the damage to the relationship with OPDC following the harsh reduction of proposed Old Oak Neighbourhood Forum boundaries – shrunk to 20% of its proposed size, despite a record number of consultation responses. Overall, these points highlight a lack of sensitivity to existing communities and a questionable commitment to community engagement.
114	2762	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Delivery and Implementation	DI1		We object to Policy DI1 which seeks to ‘appropriately balancing the priorities for affordable housing, infrastructure delivery and sustainability standards with the need for deliverability and securing the timely regeneration of the area’. This policy needs to be justified: it leaves the OPDC exposed to pressure from speculative developers to push planning applications through the system, with ‘timely’ schemes getting undue favouritism in planners’ decision-making. We believe that this unfair fast-tracking of development, without concern for sensitive residential areas, has already happened with the Genesis Housing (Oaklands) housing development.
114	2763	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Delivery and Implementation	DI2		We object to Policy DI2 on Timely Delivery and Optimised Phasing and DI2a requiring “development proposals are being brought forward as fast as possible” which is another opportunity for ill-considered development in the area.
114	2764	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Delivery and Implementation	DI2		Whilst local people were involved by the OPDC in the previous draft Local Plan, we have concerns over the nature of engagement in for the current version, including: - Limited time allowed for Local Plan presentations in summer 2017 – limited time for questions; - Lack of discussion of building heights and densities in these presentations: the OPDC kept residents in the dark about these matters; - Specific questions e.g. regarding the Oaklands development have only been discussed by the OPDC’s community representative organising one-to-one meetings with officers.
114	2765	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Delivery and Implementation	DI3		We believe that OPDC has not matched its Policy DI3b / Statement of Community Involvement with action, in various ways: Failing to stage either 1) ‘round table’ development management meetings (with applicants, planning officers, and community representatives) early in the process or 2) planning forums with an independent facilitator (Policy 3.12). As a result, we regard Policy DI3b as ineffective.
114	2766	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Delivery and Implementation	DI3		We (together with TITRA and WHRRA) believe that OPDC is not fulfilling DI3 because it chose to close down the Old Oak Neighbourhood Forum’s application for designation that would have reached many different communities that are trying to understand the implications of

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								OPDC, HS2 and boroughs' decision-making; instead the OPDC decided to designate a greater-reduced boundary area but even this decision was made unilaterally without reference to the Forum members or residents.
114	2767	Residents Association	Ewa Cwirko-Godycka	Midland Terrace Residents	Delivery and Implementation	DI3		We believe that the OPDC has not fulfilled policy DI3, providing active and simple communication to residents such as newsletters. While it published updates on its website, it is not delivering paper copy newsletters to older and disadvantaged communities that are not online or may struggle to attend OPDC events or Old Oak residents' associations meetings.
115	2786	Local Resident	Nye Jones		Delivery and Implementation	DI3		TITRA believes that OPDC is not fulfilling DI3 because it chose to close down the Old Oak Neighbourhood Forum's application for designation that would have reached many different communities that are trying to understand the implications of OPDC, HS2 and boroughs' decision-making; instead the OPDC decided to designate a greater-reduced boundary area but even this decision was made unilaterally without reference to the Forum members or residents.
116	2807	Community Group	Mark Balaam	West London Line Group	Delivery and Implementation	DI3	11.33	Para 11.33 (a) The West London Line Group would be pleased to work closely together with the OPDC on transport issues in the area.
117	2808	Community Group	Jeffrey St. Paul	Pentecostal City Mission	Delivery and Implementation	DI3		1. ACV's as a Material Planning Consideration In Supporting Community Ownership PCMC's experience of delegated planning powers pertaining to the redevelopment of the site at 2SL has been instructive. The learning could inform how policy D13 (d.) is applied in practice in regard to the ownership and management of community and programmes and the assets used to operate services for the benefit of the social infrastructure. There were a particular set of circumstances which forced the Trustees to apply for an ACV to prevent the loss of access to services provided to the local community. The set of transactions were not the typical ACV right to buy listing scenario, where a moratorium could be triggered, because the building had already been sold "above the organisations head" while still in situ as a going concern. The learning points were: ▪ But for the willingness of the developer to enter a Memorandum of Understanding to extend the lease and re-provision the Church, Nursery and community space, access to these facilities would be lost to residents of College Park, Old Oak, Harlesden and surrounding neighbourhoods. ▪ A clear statement and guidance within the local plan about whether ACV's are a material consideration in all planning applications would be helpful. This will provide a measure of reassurance that on balance ACV's won't be overridden by the commercial drivers of developers and the OPDC's accelerated regeneration target imperatives. ▪ At the point when the partial ACV on 2SL was listed the developer may well have chosen to use the permitted development rights loophole to convert the whole site to residential. The Government has removed Permitted Development Rights (PD) from pubs listed as ACVs noting the importance of pubs to communities. The ACV is therefore a material consideration in planning applications for pubs offering an extra layer protection for communities that want to keep venues operating. Recent data on the number of ACVs listed is scarce. One early data source shows that Nationally pubs dominated the list accounting for 31%, community centres 8%, churches 4% out of a total of 1,800. It is estimated that total listings may now have risen to around 4,000. ▪ In representing against the nomination, the previous owner of 2SL argued that the nursery and other community uses were ancillary to the church, further submitting that neither the religious or ancillary provision would further the social wellbeing or social interest of the local community. A partial ACV listing for the nursery activity was the outcome of the application, which has put the future of the church at risk. The developer's viability assessment contains four scenarios two of which show the church not being replaced. The development potential of installing a gym or surgery instead of the church are permed into the business model as alternate options. The outturn is the developer being forced to trade off the percentages and type of affordable housing units, leveraging its commitment to re-provision the church, nursery and community elements as the only means of achieving scheme viability. ▪ There needs to be access to transparent information that allows communities to understand the application of the ACV listing decisions, which in some cases can be regarded as either inconsistent or open to interpretation of the guidelines. In the case of 2SL it could be argued that in terms of meeting the definition of social interest, the partial listing implies that churches and faith based organisations do not make an important contribution to neighbourhood renewal and the maintaining of social infrastructure. PCMC faces a temporary relocation challenge which is nothing less than an extinction level survival threat, without any clarity about the legal obligations of the developer or the extent of the powers of the planning authority to compel in regard to the partial ACV. ▪ Clarity about how the ACV guidelines will be applied to Churches in the OPDC area would be useful. The need for a definitive statement is highlighted by a First Tier Tribunal deliberation in the case of The General Conference of the New Church v Bristol City Council. The tribunal regarded the term "ancillary use" as referenced in section 88 of the Localism Act as nowhere clearly defined and rated it no higher than "helpful". In terms of the definition of "social interest" the Tribunal was unwilling to make a definitive finding, but took note that religious worship did not fall within the (nonexhaustive) definition of the scope as defined by Parliament in reaching a decision. A parliamentary review of ACV's makes the point that the Government had not been amenable to the automatic removal of PD rights from ACVs. It prefers the targeted use of Article 4 directions to remove PD rights from specific buildings. This hands-off position leaves it to the planning authority to decide Article 4 directions. Aside from the planning authority's need for underpinning for reassurance that imposing an Article 4 direction will not mean costly compensation payments to affected property owners. Community groups also need transparency about process and procedures for assurance that balance and consistent listing decisions are being made.
117	2809	Community Group	Jeffrey St. Paul	Pentecostal City Mission	Delivery and Implementation	DI3		2. Facilitating Community Ownership Of Property Assets ▪ The Local Plan highlights the role Neighbourhood Forums should play to identify and nominate assets of community value that come up for disposal. The Local Plan could also make explicit whether this includes a mechanism for warranted interventions to retain assets that are

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Chapter	Policy	Para/ Figure	Comment
								already in community ownership. Specifically, where community ownership of an asset comes under market pressure for disposal because of accelerated development in the regeneration area. Subject to the viability of each business case support packages could be made accessible to community groups to avoid service dislocation or loss where there is a proven demand for retention
117	2810	Community Group	Jeffrey St. Paul	Pentecostal City Mission	Delivery and Implementation	DI3		It is vital to the success of the Statement of Community Engagement (SCI) that the financial windfalls from the opportunities for asset ownership is not solely for the gain of private sector investors. Concrete measures that facilitate sustainable community asset ownership e.g. as spatial focus points for service delivery will be proof positive social infrastructure benefit flows investment into the OPDC area.
117	2811	Community Group	Jeffrey St. Paul	Pentecostal City Mission	Delivery and Implementation	DI3		The OPDC should consider the selective and appropriate use of its planning powers in tandem with say the Local Government Association One Public Estate initiative to green light the creating of short tenancy/ pop up space in unused buildings or buildings with a long redevelopment cycle. Encourage owners to free up land for modular kit build short-term accommodation i.e. for office space, hot desking, business trialling/ business incubation space. Two of the aims of One Public Estate is to a) provide better, more integrated local services, in places which are more convenient for users; and b) release land and property which can be reused for housing and new enterprise, boosting local jobs, growth and housebuilding.
117	2812	Community Group	Jeffrey St. Paul	Pentecostal City Mission	Delivery and Implementation	DI3		The creation of Old Oak property register, which taps into the One Public Estate asset recording and mapping database could be a useful addition to the OPDC's register of planning applications. Community groups would be better able to access information about public owned land and property which might be available for bidding.
117	2813	Community Group	Jeffrey St. Paul	Pentecostal City Mission	Delivery and Implementation	DI3		CIL and Section 106 Distribution and building social infrastructure ▪ The Local plan investment is estimated to generate £7.6bn GVA per annum over the next 20 years. The scale of the Local plan is challenging in ambition, scope and regeneration targets. The measure of the financial challenge is reinforced by the forecast funding gap of circa £1.2bn. The shortfall is planned to be partially bridged by Community Infrastructure Level (CIL) and Section 106 contributions (S106) from developments. The balance in gap finance will require the use of mechanisms such as borrowing against future local tax revenues, a revolving investment fund and additional government grants. ▪ An assessment of the Local Plans viability would be aided by the analysis of business plans like the one agreed for Old Oak North, schedule for September 2017 for which there is a budgeted £0.8m set aside.
117	2814	Community Group	Jeffrey St. Paul	Pentecostal City Mission	Delivery and Implementation	DI1		A fair proportion of CIL/S106 receipts should be used to build the capacity of community groups to enable them to contribute to the delivery of the OPDC's social infrastructure targets. There is risk that the pressure on CIL/S106 to meet gap finance may degrade the opportunities for capacity building and investment in programmes which aim to improve the life chances of existing and future residents through access to skills, education, job and enterprise training. The Local Plan needs to act as a catalyst for change by facilitating delivery platforms that brings together all the local community agencies and experts to deliver the OPDC's CIL/S106 funded social infrastructure agenda. The capacity of the voluntary and community sectors to deliver local interventions has been degraded in the past 10 years. This is partially the result of the general squeeze on public sector finance, but has also been driven by changes in contract commission structures. The fragmentation and unevenness of delivery by multiple suppliers led to the outsourcing of contracts to major suppliers judged to be in a better position to cashflow upfront costs, debtor days and margins. Paradoxically commissioning aimed at achieving contract security has exposed the government to the risks of single sourcing/ market dominance and the priorities of shareholders sometimes overriding the delivery of the public good. When non-performance/ compliance issues are exposed the provider is deemed too big to fail or irrecoverable losses of public funds are incurred.
117	2816	Community Group	Jeffrey St. Paul	Pentecostal City Mission	Delivery and Implementation	DI1		▪ Research evidence confirms that churches and faith groups can make an important contribution towards the achievement of government objectives, particularly related to reducing social exclusion and supporting neighbourhood renewal. The local plan references the Tottenham Hale "Engine Room 2" (ER2) as a model of community run social infrastructure delivery operated by the London Diocese. The service mix of ER2 is similar to the redevelopment plans for 2SL, i.e. providing a church, community space and day nursery. The difference being that the private sector is driving the development of 2SL, which consequentially exerts commercial market pressures on the sustainability of the delivery of the social infrastructure benefits. A developer's understandable incentive to achieve rack rent yields on a new build will in most cases be difficult to sustain by the fragile income lines of majority of community groups. The examination of the appropriate use of CIL/S106 distribution asset to assist viable community ownership propositions which softens the corrosive effect of hard cord financing on sustainability could be of benefit.

Local Plan Supporting Studies

General

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
9	13	Statutory Consultee	Ronan Torkildsen	Historic England	Overall		In addition to the body of commissioned heritage evidence, could we encourage an early completion of any outstanding conservation area appraisal within and adjacent to the plan area, as these will help to inform a high quality design response that positively responds to the character and appearance of those special historic places. In this respect we would emphasise, in particular, the importance of producing the Cumberland Park Factory conservation area appraisal, and ideally, an associated management plan. In addition could we encourage working with the relevant authority to secure an appraisal of the St Mary's Cemetery Conservation Area which also abuts Scrubs Lane, and is earmarked for substantial development.
9	14	Statutory Consultee	Ronan Torkildsen	Historic England	Overall		Historic England supports the intention to shortly complete a Local List as SPD to the development plan and the explicit policy approach to endeavour to ensure non designated heritage assets are retained

A40 Study

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
99	1867	Residents Association	John Haston	West Twyford Residents Association	A40 Study		The A40 Corridor's transport supporting study misses out one important junction. That is the junction with Concord Road. This is where all west bound traffic leaving Coronation Road in Park Royal have to go east and do a 'U' turn at the traffic lights on the A40. The First Central Development in Park Royal on Coronation Road promised a flyover over the A40, for west bound traffic. This never materialised and the only way I can see of freeing up the congestion on the A40 here is to have an overhead roundabout above the A40 at Concord Road. This would allow West travelling traffic travelling which have to travel East off Coronation Road to do a 'U' turn over the A40, without it being stopped.

Affordable Housing Viability Assessment (AHVA)

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
41	519	Agent	Jack Savin-Taylor MRICS	DS2 (on behalf of Old Oak Park Limited)	Affordable Housing Viability Assessment		The AHVA takes no account of the cost of infrastructure, despite the fact that the Local Plan requires a series of transport and social infrastructure, some of which is specifically allocated for OOP. The full cost of the infrastructure required to unlock the OOP site are not known at this stage, however, considering the site is the largest, privately owned site in the Old Oak & Park Royal area and is expected to be the first major development to be delivered, we anticipate that OOP Ltd will be required to directly pay for some of this new infrastructure. In turn however, the AHVA assumes "that the future infrastructure associated with the OPDC area has been provided and reflected within the adopted sales values". You cannot have one without the other.
41	520	Agent	Jack Savin-Taylor MRICS	DS2 (on behalf of Old Oak Park Limited)	Affordable Housing Viability Assessment		The five notional site typologies tested by the AHVA are not reflective of the specific characteristics of the Local Plan area, in terms of infrastructure requirements as noted above, but also the size and nature of the different landholdings. The OOP site is not reflected within the five notional sites, but yet represents approximately a quarter of all homes anticipated of being delivered within the Local Plan area.
41	521	Agent	Jack Savin-Taylor MRICS	DS2 (on behalf of Old Oak Park Limited)	Affordable Housing Viability Assessment		The key recommendations (in the AHVA) are as follows (the underlining is our own): • 70% of the affordable housing being London Affordable Rent is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing. • 30% London Affordable Rent/ 70% Intermediate is viable on all sites tested at 35% affordable housing apart from the site with the highest threshold land value, and on 3 sites at 50% affordable housing. • A greater emphasis on 1 and 2 bed units increases the overall viability of development as these units usually have a higher value per sq ft and maximises the overall number of affordable housing units that can be delivered. • The assessments take no account of infrastructure requirements which will reduce the amount of affordable housing that can be delivered. • Affordable housing grant can increase the overall level of affordable housing delivered. Despite the conclusions of the AHVA, the Revised Local Plan proceeds to set the overall affordable housing target at 50%, and sets the family housing target at 25%. Very simply, the Local Plan is not taking full account of the evidence base.
41	522	Agent	Jack Savin-Taylor MRICS	DS2 (on behalf of Old Oak Park Limited)	Affordable Housing Viability Assessment		The AHVA takes no account of infrastructure requirement, but whilst at the same time acknowledging the impact of said infrastructure costs on affordable housing. Additionally, at Section 3.4 'Value Inputs' it states for the private residential values that whilst the assessment has been undertaken on the basis of current cost and current values, the AHVA make a special assumption that the future infrastructure has already been provided and reflected within the sales values. Fundamentally, this cannot be the correct approach. On one hand, the cost of infrastructure is not being reflected in the AHVA, but then on the other hand the value benefit of this infrastructure is being included. The result is to overstate the viability of the notional sites being tested as part of the AHVA, and as a further consequence, to inflate the overall affordable housing policy target being proposed within the Revised Local Plan to an unrealistic level. In order to address what we consider to be a major flaw, either the infrastructure costs are reflected in economic testing through an appropriate area-wide assumption, or the sales values are revised to preclude the value benefit of the future infrastructure. Given that other documents that form the Local Plan evidence base also assume that the future infrastructure is in place (e.g. the Development Capacity Study) the latter option is not considered to be a consistent approach.
41	525	Agent	Jack Savin-Taylor MRICS	DS2 (on behalf of Old Oak Park Limited)	Affordable Housing Viability Assessment		The AHVA considers five different site typologies based on general location within the OPDC area. The AHVA also tests three density levels expressed as dwellings per hectare (dph); 300 dph, 405 dph and 600 dph. Each site is assumed to be 1 hectare in area. As previously highlighted the OOP site has capacity for up to 6,500 homes and 125,000 sq m of commercial floorspace, approximately 25% of all homes and 15% of all commercial floorspace anticipated of being delivered within the OPDC. Given that the OOP site represents such a large

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
							proportion of overall development it seems incongruous that none of the five typologies tested bear a closer OOP site. We recommend that an additional site typology is included within the viability testing, to include a site that is more closely aligned with the OOP site and therefore more reflective of the reality in terms of scale and complexity of development. This exercise would also go hand in hand with the requirement to include the necessary infrastructure at the OOP site.
41	526	Agent	Jack Savin-Taylor MRICS	DS2 (on behalf of Old Oak Park Limited)	Affordable Housing Viability Assessment		The AHVA adopts the established approach whereby it is assumed that a notional developer purchases the site from a landowner at the residual land value, builds the development and then sells all interest in the completed properties in return for a set profit margin. Whilst this approach is suitable for most forms of development, no consideration is given to whether alternative forms of appraisal model would be more appropriate given the size, complexity and timeframes associated with delivering the OOP site. No consideration is given to an alternative approach, for example that of the 'lead-developer' model which is more suitable for larger, phased developments. This model assumes a more strategic approach to delivering a complex site whereby the lead developer purchases the site, pays for the primary infrastructure as well as the costs of remediating and preparing the site, but then sells off separate development parcels to third party developers. This approach has been adopted as part of the emerging site-specific viability work at the OOP site. We suggest that as part of the suggested sensitivity testing regard is given to an alternative form of appraisal model, or site typology, that reflects the disposal characteristics of major complex developments such as that at OOP.
41	527	Agent	Jack Savin-Taylor MRICS	DS2 (on behalf of Old Oak Park Limited)	Affordable Housing Viability Assessment		The AHVA adopts a GIA to NIA ratio of approximately 80%. This is considered too high for a strategic site and the result is to overstate the viability of the notional sites being tested. Whilst 80% may be considered acceptable for a traditional residential development (on a small to medium scale), for large developments this is practically unachievable. When arranged over multiple buildings the requirement for multiple lift cores, lobbies, bin stores, plant and basement car parking will all result in a reduction in overall efficiency. Additionally, the larger a development becomes the greater the requirement for residential amenity space, again, resulting in further reductions in efficiency. In summary, it is considered that a net to gross ratio at OOP will be significantly lower than 80%, however this is being considered further by OOP Ltd and their consultant team.
41	528	Agent	Jack Savin-Taylor MRICS	DS2 (on behalf of Old Oak Park Limited)	Affordable Housing Viability Assessment		The AHVA does not include any employment floorspace. Firstly, given the size of the notional sites being tested, to exclude entirely any commercial uses appears wholly unrealistic. DS2's experience of similar developments is that whilst a proposal can be residential-led, there is typically a requirement for employment floorspace in some shape or form, for example at ground floor level to activate a street frontage or where existing commercial floorspace is to be re-provided. Secondly, the OPDC area is a major regeneration area, which by its nature means that any employment floorspace will be considered secondary/tertiary when compared to more mature commercial locations, and as a result when assessed on a current day basis the value of this commercial floorspace will be less. Such commercial floorspace is often not commercially viable in its own right and is therefore considered to be 'planning-led'. When included as part of a scheme the impact of this commercial floorspace will be to reduce the overall viability of the development. Conversely, by excluding this floorspace the result is that viability is overstated. We recommend that a suitable assumption as to the level of commercial floorspace is made, and the value impact included as part of the notional site testing.
41	531	Agent	Jack Savin-Taylor MRICS	DS2 (on behalf of Old Oak Park Limited)	Affordable Housing Viability Assessment		The Report adopts a 5% allowance. This is an established allowance for traditional forms of development. The development at OOP is a multi-phased scheme to be built out over a number of years. Given the potential for future changes to design over the life of the development, magnified by the fact that the scheme at OOP will be secured in outline, it is considered that an additional 'design reserve' is required to mitigate the risk of future changes. It is acknowledged that such an allowance is not appropriate for all forms of development and again, reinforces the need for an additional site typology to be tested which is more closely aligned with the characteristics of the OOP site.
41	532	Agent	Jack Savin-Taylor MRICS	DS2 (on behalf of Old Oak Park Limited)	Affordable Housing Viability Assessment		Allowances for demolition and remediation are based on pro-rated costs from the Deloitte CIL Study, itself informed by the previous DIFS produced by Peter Brett Associates. As above, early work undertaken by OOP Ltd suggests these costs are significantly higher given the size of the site and existing uses currently in operation. It is not considered appropriate to account for these through a generic area-wide calculation. As with the consideration of infrastructure costs we suggest that further work is undertaken with OOP Ltd and the OPDC to either establish either an appropriate variation on the area-wide appraisal allowance, or undertake further sensitivity testing based on higher levels of remediation/ decontamination.
41	533	Agent	Jack Savin-Taylor MRICS	DS2 (on behalf of Old Oak Park Limited)	Affordable Housing Viability Assessment		That the cost of infrastructure is taken into account. In the first instance, this should be determined through the DIFS which already forms part of the Local Plan evidence base, but which can be supplemented through further dialogue between OOP Ltd and the OPDC as a result of the site-specific viability testing currently being undertaken.
41	534	Agent	Jack Savin-Taylor MRICS	DS2 (on behalf of Old Oak Park Limited)	Affordable Housing Viability Assessment		That additional site typologies are included within the AHVA, specifically one that is more closely aligned with the scale and complexity of the OOP site, which account for such a significant proportion of the OPDC area's capacity for new homes and commercial floorspace.
68	1068	Community Group	Martin Cain	Friary Park Preservation Group	Affordable Housing Viability Assessment		The failure to provide numerical details of the precise meaning of the term affordable is a problem.

OPDC First Revised Draft Local Plan Consultation: List of Representations

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
68	1069	Community Group	Martin Cain	Friary Park Preservation Group	Air Quality Study		The lack of information on measuring air quality and measures to enforce legislation is a problem.
70	1117	Local Resident	Joanna Betts		Air Quality Study	P 54/55	Particualte matters lower but did not model dispersion from industrial sites... p. 53
85	1352	Local Resident	Francis, Marc and Caroline Sauzier		Air Quality Study	P 54/55	Particualte matters lower but did not model dispersion from industrial sites... p. 53
88	1426	Local Resident	Lily Gray		Air Quality Study	P 54/55	Particualte matters lower but did not model dispersion from industrial sites... p. 53
93	1775	Residents Association		Wells House Road Residents Association	Air Quality Study	P 54/55	Particualte matters lower but did not model dispersion from industrial sites... p. 53
106	2230	Local Resident	Catherine Sookha		Air Quality Study	P 54/55	Particualte matters lower but did not model dispersion from industrial sites... p. 53
113	2725	Local Resident	Thomas Dyton		Air Quality Study	P 54/55	Particualte matters lower but did not model dispersion from industrial sites... p. 53

Circular and Sharing Economy Study

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
68	1070	Community Group	Martin Cain	Friary Park Preservation Group	Circular and Sharing Economy Study		The lack of precise details of measures to promote the circular and sharing economy is a problem.

Cultural Principles

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
71	1124	Local Business	Ben Eastop	ACAVA	Cultural Principles	10.44	We welcome the view that artists contribute to the 'vibrancy, identity and place making' of an area through a variety of activities and programmes. However, at a local level, these are generally not self-financing or fully sustainable, and require additional funding and resources to be maintained for any period of time. We would like to see provision for funding within Section 106 agreements or other planning gain within the OPDC area to support cultural programming and subsequent employment growth for artists, performers and creatives.
81	1241	Community Group	Chloe Fremantle	ArtWest	Cultural Principles		77, 78, 79, we very much hope you will be able to include mixed use affordable areas as per your case studies: as well as Matchmakers Wharf & Olympic Park the OPDC might research the 16 or so Harrow Road Acme studios, (733 Harrow Road, London NW10 5BQ) where ground floor wheelchair accessible studios were successfully created as part of a modern housing development, and which are very well designed and well integrated.
81	1243	Community Group	Chloe Fremantle	ArtWest	Cultural Principles		We would urge you to include in recommendation 14 an arts/community centre which could act as a stage/ workshop delivery space / film/ sound & music/ and dance multi- cultural space.

Development Capacity Study (DCS)

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
42	610	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Development Capacity Study (DCS)		We support the inclusion of the Cargiant site as Site 5 in Appendix B for inclusion in Part 1 of OPDC's Brownfield Register.
58	969	Local Resident	Arnaud Demas		Development Capacity Study (DCS)		it will not preserve the wild natural life that the lake provide and it does not respect the the local environment and surrounding,
61	987	Local Resident	Ron Thorp		Development Capacity Study (DCS)		Too many towers. All too tall. Why are the GLA density guidelines allowed to be ignored?
110	2322	Community Group	Sharon Hayward	Grand Union Alliance	Development Capacity Study (DCS)		The Revised Development Capacity Study prepared for the Regulation 19 consultation point 3.2 (p. 9) is clear that the targets of 65,000 jobs across the OPDC area are NEW jobs, not net, or "additional", which does not take account of job losses expected. This Study does not assess the potential for these jobs to be realized, nor take account of job losses, although relevant information on this is available elsewhere in the supporting documents (Document 25. ILR) and (although without any numbers attached) Appendix A of the DCS (Supporting Document 12) which includes information on active enterprises which currently employ up to 5287 people, some of which do not wish to develop their land or be relocated, and are very committed to remaining in the area as this is the basis for their business e.g. active local authority contacts, or supply and delivery networks.

Development Infrastructure Funding Study (DIFS)

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
41	524	Agent	Jack Savin-Taylor MRICS	DS2 (on behalf of Old Oak Park Limited)	Development Infrastructure Funding Study		It is acknowledged that the DIFS does not provide a definitive assessment of cost for the new infrastructure, however on the basis that the document is deemed robust enough to be included within both the Local Plan and CIL Charging Schedule evidence bases, it is considered sufficient for the purposes of plan-making viability testing. Additionally, the OOP Ltd and DS2 has been engaging with the OPDC and their

							viability advisors over the past 12 months in respect of the site-specific viability at the OOP site in advance of a formal planning application. As such, additional detail to the Local Plan evidence base could be determined through further engagement and dialogue between the parties. We suggest that in the first instance the costs from the DIFS are used to inform an appropriate area-wide appraisal assumption with the Deloitte notional site testing. Whilst it is accepted that any determination of the required infrastructure costs will not be final, the level of detail is considered sufficient to inform the AHVA, which is itself an area-wide study comprised of high level appraisal assumptions.
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Duty to Cooperate Statement

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
47	722	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Duty to Cooperate Statement		Further details of Duty to Cooperate activities are provided in the Duty to Cooperate Statement, however there are some additional key activities which can be included between paragraphs A2.33 to A2.43. These will assist in explaining the wider DtC activities the OPDC have undertaken with the Western Riverside WPAs and are summarised in italic below. Activity: Officer steering group to progress the WRWA WPA Waste Technical Paper Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth. Comment: Drafts of the Waste Technical Paper were agreed through discussion and cooperation. WPAs agreed to pool waste apportionments, arising and available capacity. WRWA WPA Officers agree to signing up to a Memorandum of Understanding subject to member confirmation and signoff. Date: September 2016 (inception meeting), November 2016 (Draft Report stage), 17 January 2017 Activity: WRWA WPAs / GLA Meeting on Waste Technical Paper Partners involved: Royal Borough of Kensington & Chelsea, London Boroughs of Hammersmith & Fulham, Lambeth and Wandsworth, GLA Comment: Confirmed approach to pool waste apportionment and capacity to GLA. GLA commented on Powerday capacity assumptions. OPDC to initiate discussions with Powerday Operators on reorientation of waste capacity and energy generation on site at the facility. Dates: 3 February 2017 Activity: Seeking clarity on Powerday capacity on behalf of WRWA WPAs. Partners involved: OPDC on behalf of WRWA WPAs Comment: OPDC contacted Powerday Operators seeking further clarity on capacity at the facility and future plans to increase throughput and on site energy generation. Dates: [Date to be inserted by OPDC] Activity: OPDC confirmation on continued joint working / Memorandum of Understanding. Partners involved: Royal Borough of Kensington & Chelsea Comment: OPDC confirmed it will work with the other Western Riverside WPAs towards the objective of agreeing a Memorandum of Understanding (MoU) between the authorities, setting out the parameters for joint working on waste planning matters. Dates: 27 April 2017.

Education and Health Needs Study

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
11	24	Statutory Consultee	Sue Hardy	NHS Brent CCG	Education and Health Needs Study		Thank you for the opportunity to comment on the Infrastructure Advisor Stage 2 Report – Education and Health Strategy provides an outline of the anticipated impact on education and health infrastructure of the development of Old Oak Common and Park Royal. Whilst some of the development has already been delivered there is a further anticipated rise in the total population of circa 59,000 (dependent of the proportion of affordable housing applied to the model) between 2017 and 2050. Whilst the growth has been linked to the phased development of the residential zones and there is a clear focus of the report on the infrastructure consequences for early years and education there is no breakdown of the growth by age band. Given the known national growth in older adults it is important to understand whether this significant expansion will alter the overall age distribution already within health planning assumptions. The currently unclear housing mix will also influence the type of health care infrastructure required. In North West London we aim to provide services that are personalised, localised, coordinated and specialised across health and social care providers to improve care for our patients. We will achieve this by giving primary care the opportunity to deliver care in larger premises through a more consistent hub and spoke model. This will provide seven-day extended access and improve the management of long term conditions to give everyone access to the same, high quality services. This is vital for the sustainability of our health and care economy.
11	25	Statutory Consultee	Sue Hardy	NHS Brent CCG	Education and Health Needs Study		While the NHS proposal for Old Oak is to establish a single health Hub (with one or two spokes – not two as stated in the report) it is not clear how the sizing of such a facility reflects the opportunity to integrate with social care and other public sector partners or how indeed the wider public sector infrastructure requirements could be married to provide an inclusive and more flexible solution able to respond to the changing population structures in the locality. The planning assumptions refer only to primary care- and assumed list size per GP which is a somewhat outdated approach - it would therefore be of concern that the impact on primary care and the design of the central Hub may therefore be underestimated if the infrastructure planning assumptions for the wider provision of public services have not been adequately accounted for.
11	26	Statutory Consultee	Sue Hardy	NHS Brent CCG	Education and Health Needs Study		One of the site options given consideration in the document is Mitre Wharf and is only 1.3 miles away from St Charles Centre for Health and Care. Whilst this site remains an option if selected the impact will need to be an essential part of the development proposals for the next

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
							phase at St Charles and the indeed the strategy for primary care estate in North Kensington (this would be in addition to the Hub and spoke/s).
11	27	Statutory Consultee	Sue Hardy	NHS Brent CCG	Education and Health Needs Study		The document does not appear to make reference to all of the primary care locations of practices on the local border. The impact of these practices may be limited (or indeed already reflected as the closest residential developments are highlighted as delivered). We will need to ensure that the CCGs are given new information as it becomes available so the impact can be considered further.
11	28	Statutory Consultee	Sue Hardy	NHS Brent CCG	Education and Health Needs Study		The document highlighted a need for a significant increase in the number of GPs for the increased population. Due to changes in the way primary care is being delivered now and will continue to develop over the duration of the Local Plan, due consideration needs to be given to the wider primary care workforce, including nurses, health care assistants and associated health professionals.
11	29	Statutory Consultee	Sue Hardy	NHS Brent CCG	Education and Health Needs Study		Whilst it is appreciated that the purpose of the document is to identify the spatial consequence of the rise in population and the projected capital infrastructure cost there is no consideration of the revenue impact (associated with the cost of supporting additional premises) of such a large growth – a concern given the funding environment facing all of the impacted NWL CCGs. How is this being addressed?
11	30	Statutory Consultee	Sue Hardy	NHS Brent CCG	Education and Health Needs Study		It is noted that your latest assessments have highlighted a need for increased provision of acute beds (114 by 2050) - we don't recognise your methodology in how you arrived at these numbers. Could you explain your modelling and how you have taken account of the plans set out by the NHS in particular the Shaping a Healthier Future Programme and more recently the NW London Sustainability and Transformation Programme?
11	31	Statutory Consultee	Sue Hardy	NHS Brent CCG	Education and Health Needs Study		The document is designed to advise on the local planning implications of the population growth proposed and in the absence of any detailed modelling this does appear to raise a number of questions beyond those of physical estate.
11	32	Statutory Consultee	Sue Hardy	NHS Brent CCG	Education and Health Needs Study		We welcome the involvement of a strategic health advisor in the OPDC team, but would strongly encourage the OPDC to consider how it might engage with health sector partners to maximise the population health benefits associated with the development. For example, increasing employment for local residents, designing in health benefits such as access to green space and cycling routes and working with the health and care system to ensure new residents have access to 21st century health and care services. The CCGs would welcome the opportunity to discuss how this ambition might be achieved, and would encourage the OPDC to consider lessons from the Healthy New Towns being developed elsewhere in the UK.
11	33	Statutory Consultee	Sue Hardy	NHS Brent CCG	Education and Health Needs Study		Whilst this [they study] reflects the national context and touches on the NWL STP (draft) it does not adequately reflect the final, published STP (5.1) and the reference to patient list sizes and primary care space per GP in sub-section 5.3 does not support the aspirations of the Five Year Forward View also referenced in sub-section 5.1 and reflects a former nor future approach to modelling health care services and infrastructure requirements.
11	34	Statutory Consultee	Sue Hardy	NHS Brent CCG	Education and Health Needs Study		Sub-section 5.4 again refers to a 'facility being triggered when a three GP patient list is created' and that at 59,400 list size requires 33 GPs – this is an outdated model and in line with the well documented reports of a lack of GPs and trainees this is not a model that is sustainable. - Sub-section 5.5 - Again references to the numbers of GPs needs to be removed and only list sizes used (bottom of page 31). - Given the comments above the whole of sub-section 5.6 needs to be reworked to focus on patient numbers not the numbers of GPs.
11	35	Statutory Consultee	Sue Hardy	NHS Brent CCG	Education and Health Needs Study		Sub-section 5.5 now needs to include reference to St Charles Centre for Health and Wellbeing in relation to the proposed Mitre Way development. In respect to the creation of a primary care facility at Central Middlesex Hospital, the procurement has taken place and a new provider for the facility selected. The service will go live in early 2018.
11	36	Statutory Consultee	Sue Hardy	NHS Brent CCG	Education and Health Needs Study		Hammersmith & Fulham CCG is working with Imperial College Healthcare Trust to consider how the additional transitional capacity for primary care can be accommodated on the Hammersmith Hospital site, through a reconfiguration of the existing GP practice space. These plans would be contingent on receipt of capital funding from section 106 contributions made through initial developments in the OPDC area.
11	37	Statutory Consultee	Sue Hardy	NHS Brent CCG	Education and Health Needs Study		Following table 17 – which needs to be updated to reflect the current position and list sizes, a statement is needed in respect of patient choice and the opportunity for patients to continue to choose which GP practice they register with.
23	187	Local Authority	Cllr. Muhammed Butt	London Borough of Brent	Education and Health Needs Study		As outlined in detail in the joint response with Hammersmith & Fulham and Ealing, the Councils have some concerns in relation to the use of the Education and Health Needs Study as a reliable supporting document. The Education and Health Needs Study identifies the need for two primary schools, one secondary and an all-through school (outside of the plan period) in the OPDC area. This is based on the use of off-site capacity and potential expansions. The Councils have a number of concerns in relation to the Education and Health Needs Study. These are the following: -The assumptions underlying the Education and Health Needs Study – the use of historic estimates for future projections and the lack of individual borough housing growth built into the assumptions. -Capacity in schools – is based on current year capacity in schools. The take up of school spaces is subject to a number of considerations such as parental choice, accessibility and proximity to other services. The 'capacity' therefore is not stagnant and is likely to change on a year to year basis. It is, therefore, not considered appropriate for the OPDC to rely on the spare capacity to meet future demand arising in the first five years of the plan period as the OPDC cannot necessarily earmark these spaces. -Expansion programmes – OPDC have identified a number of expansion programmes. The Councils are concerned by the lack of detail to the delivery and the lack of engagement to date with local authorities to secure these programmes.
56	943	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Education and Health Needs Study		Text on page 1 (back of front cover) should be changed to acknowledge that further work needs to be undertaken in order to finalise whether some schools do have the capacity to be expanded. Suggested change to text: Key Recommendations, bullet point 1: Key Recommendations, bullet point 1: 'There may be the ability to expand some off site facilities to meet the needs in early years for education and health infrastructure, subject to site feasibility work being undertaken with the relevant school and LEA'
56	944	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Education and Health Needs Study		2.4.1 AECOM Stage 2 objectives. Bullet point 2 This sentence doesn't make sense. 'Assess and identify spare capacity in the surrounding area in light of updated advice from the surrounding local authorities that there is not surplus or spare capacity in the surrounding schools'.

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
							Change to: 'Work with local authorities to identify updated figures in relation to spare capacity in the surrounding schools.'
56	945	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Education and Health Needs Study		The title of section 4.5 should be changed as it not only discusses expansion of schools, but also use of existing surplus places. Insert 'surplus places': Off site school surplus places and school expansion
56	946	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Education and Health Needs Study		The reference to surplus capacity (4.5, para 2, 1st sentence) needs to be defined to current capacity which will change, and not to any forecast surplus places. Also delete reference to being identified by Borough Reps. Suggest change to text: Table 10 illustrates the net current (year 2016/7) additional capacity that is assumed to be available from surplus capacity and expansion projects
56	947	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Education and Health Needs Study		Title (Table 10, 5th column) should be changed to make clear these figures refer to 2016/7 estimates. Suggested change to text: Current surplus places (year 2016/2017)
56	948	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Education and Health Needs Study		Table 10 should be split into two in some manner– one for proposed expansions and one for proposed use of surplus places as it is very confusing and open to interpretation. Is only one primary school being proposed for expansion -West Twyford? Are the others only being identified in relation to use of any surplus places?
56	949	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Education and Health Needs Study		If there are 580 surplus places in 2016/7 identified from 5 schools, where does the figure of 840 places come from? 260 new places at West Twyford?
56	950	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Education and Health Needs Study		Insert the following below Table 10: 'Based on the location of these off-site expansions and use of potential surplus places in relation to the ...
56	951	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Education and Health Needs Study		The following 2nd sentence (section 4.8) needs to be deleted: 'The Local Education Authorities (LEAs) have identified the existing schools that may have the potential for off-site expansion to meet the needs of the development in the early phases'. LBHF has not identified any schools for expansion, and are not in the position to do this until proper feasibility work has been undertaken. Suggeste change to text:OPDC's Local Plan includes a 50% affordable housing policy with 25% family housing. Proposals for the expansion of the existing off site schools is not yet committed and OPDC will be working with the relevant service providers to further investigate the potential for these facilities to be expanded. On this basis, the OPDC Local Plan needs to model for on site requirements based on the education needs as set out in Section 4.7.'
56	952	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Education and Health Needs Study		1st bullet point (section 4.11) should be deleted and replaced with alternative wording to more accurately reflect the early discussions that have taken place with LBHF: 'The study assumptions used to generate the school needs in this report need to be further tested with the relevant stakeholders. Proposals for the expansion of these facilities is not yet committed and OPDC will be working with the relevant service providers to further investigate the potential for these facilities to be expanded.'
56	953	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Education and Health Needs Study		Although section Appendix C.1.1 states that surplus places will be used at Old Oak and Kenmont, it is not entirely clear whether Old Oak and Kenmont are also being considered for expansion. Text needs to be amended to make clear if only Phoenix is being considered for expansion, or also Old Oak and Kenmont. See separate comments on ability of these primary schools to expand in the joint Council letter dated 11th September 2017.
76	1172	Strategic Partner	Colin Lovell	Diocese of London	Education and Health Needs Study		It is not clear from the Education and Health Needs report as to whether sufficient outdoor space is allocated for play in the commercial nurseries. Play space is very important if children are living in small apartments.
108	2277	Statutory Consultee	Samantha Powell	Education and Skills Funding Agency	Education and Health Needs Study		6. The ESFA welcome the production of the Education and Health Needs Study (EHNS) (May 2017). This background document clearly presents research, evidence and analysis including pupil projections, existing school capacity, and potential locations for provision of education infrastructure to meet the needs arising from the anticipated growth (c27,000 homes over the plan period) as well as school delivery models and design assumptions. The methodology and assumptions for school site selection are also clearly set out within the study. 7. The EHNS demonstrates that the plan has been positively prepared based on a strategy which seeks to meet objectively assessed infrastructure requirements, and is justified based on proportionate evidence. 8. The study includes reference to the proposed expansion of existing schools off-site/outside the OPDC boundary, but notably these expansions are not yet committed (Appx G1). The key recommendations confirm the need over and above these expansions for four new schools over the plan period: Two primary schools: One 4FE at Cargiant site by 2026 and one 4FE at Crossrail depot or HS2 station site by 2032 One secondary school: One 9FE at Sword and Shield site by 2028 One all-through school: One 4FE, site TBC
48	724	Local Authority		LBHF, LB of Ealing and LB or Brent (Joint Response)	Education and Health Needs Study		The Education and Health Needs Study identifies the need for 2x primary schools, 1x secondary and an all-through school (outside of the plan period) in the OPDC area. This is based on the use of off-site capacity and potential expansions of schools outside the OPDC area. Table 10 of the Study (Para 4.5) should be clarified so that it is clear which schools are earmarked for expansion and which are being identified for use of surplus places [Table with further information is provided]. Across these schools, the study identifies that there is a total of 580 surplus primary school places, though this figure is for 2016/7. The estimated surplus capacity across secondary schools is not identified.

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
48	725	Local Authority		LBHF, LB of Ealing and LB or Brent (Joint Response)	Education and Health Needs Study		Role of boroughs: Since the establishment of the OPDC, the OPDC have taken planning control of the relevant areas. The boroughs, however, remain the Local Education Authority (LEA) which is in charge of ensuring there are adequate school places for residents. LBHF is currently part of a tri-borough arrangement for school place planning with Westminster and RBKC; RBKC officers are responsible for school place planning in LBHF. Brent and Ealing are responsible for their own school place planning. Each borough works differently in terms of identifying education provision, the levels of funding and other working arrangements.
48	726	Local Authority		LBHF, LB of Ealing and LB or Brent (Joint Response)	Education and Health Needs Study		The Councils have a number of concerns in relation to the Education and Health Needs Study set out as follows: (Please also refer to specific comments in the table provided by LBHF separately): - The assumptions underlying the Education and Health Needs Study – the use of historic estimates for future projections and the lack of individual borough housing growth built into the assumptions.
48	727	Local Authority		LBHF, LB of Ealing and LB or Brent (Joint Response)	Education and Health Needs Study		The Councils have a number of concerns in relation to the Education and Health Needs Study set out as follows: (Please also refer to specific comments in the table provided by LBHF separately): - Capacity in schools – is based on current 2016/7 year capacity in schools. The take up of school spaces is subject to a number of considerations such as parental choice, accessibility, proximity to other services. The 'capacity' therefore is not stagnant and is likely to change on a year to year basis. It is therefore not considered appropriate for the OPDC to rely on the spare capacity to meet future demand arising in the first five years of the plan period as these numbers will fluctuate year by year and are not forecast surplus places but existing surplus places which the OPDC cannot necessarily earmark.
48	728	Local Authority		LBHF, LB of Ealing and LB or Brent (Joint Response)	Education and Health Needs Study		The Councils have a number of concerns in relation to the Education and Health Needs Study set out as follows: (Please also refer to specific comments in the table provided by LBHF separately): - Expansion programmes – OPDC have identified a number of expansion programmes as set out in the table above. The Councils are concerned by the lack of detail to the delivery and relationship with the LEAs to secure these programmes.
48	729	Local Authority		LBHF, LB of Ealing and LB or Brent (Joint Response)	Education and Health Needs Study		The Councils have a number of concerns in relation to the Education and Health Needs Study set out as follows: (Please also refer to specific comments in the table provided by LBHF separately): - Suitability and selection of off- site schools: the Councils have not identified any schools for expansion, and are not in the position to do this until proper feasibility work has been undertaken. The selection of schools needs to be looked at strategically to assess their desirability in terms of access and routes to these schools from the OPDC housing development areas and whether the schools identified are suitable to meet the future needs arising from the OPDC area.
48	730	Local Authority		LBHF, LB of Ealing and LB or Brent (Joint Response)	Education and Health Needs Study		The Councils have a number of concerns in relation to the Education and Health Needs Study set out as follows: (Please also refer to specific comments in the table provided by LBHF separately): - There should be adequate agreed sign off procedures with each Local Authority to progress with any proposals for existing schools and new school provision in the OPDC area.
48	731	Local Authority		LBHF, LB of Ealing and LB or Brent (Joint Response)	Education and Health Needs Study		The Councils have a number of concerns in relation to the Education and Health Needs Study set out as follows: (Please also refer to specific comments in the table provided by LBHF separately): - Further consideration needs to be made for early years, Pre-school and SEN provision in the OPDC area.
48	733	Local Authority		LBHF, LB of Ealing and LB or Brent (Joint Response)	Education and Health Needs Study		Clarity is required on whether expansion is being proposed for Old Oak and Kenmont, or just use of surplus places. Please see separate comments in detailed table to the Study. Old Oak Primary School, Mellitus Street, W12 (Primary school) - School is in the Old Oak and Wormholt Conservation Area; - Need to know what the new floorspace requirements there are for an increase in 1FE – (presumably 7 additional classrooms, additional communal facilities such as hall/dining space etc); - Feasibility study needs to be undertaken in conjunction with LBHF Planning, Education and the School as to how an additional 1 FE could be achieved whilst preserving the appearance of the conservation area. Kenmont Primary (Primary School) - Grade II listed school. It is a traditional London Board School dating from 1883-4. - It has a relatively limited sized playground, a MUGA, an ancillary building in the playground (formerly the cookery and laundry classroom) and a vacant caretaker's property (which has now been taken out of the listing description). - Significant concerns as to how this school site could physically be expanded by 1 FE without harm to the setting of Listed Building. Feasibility study needs to be undertaken in conjunction with LBHF Planning, Education and the School. Phoenix High School (Secondary school) - There is an adopted planning brief dating from 2009 for this school which states that the site should be retained for education purposes; - It has generous outside space and sports facilities; - It has potential for a physical expansion school by 2FE but a feasibility study needs to be undertaken in conjunction with LBHF Planning, Education and the School as to whether the site has capacity for 2FE secondary expansion. SEN provision – H&F Council has five SEN schools within the borough. The SEN service is a 'shared service' and the Council will endeavour to place resident pupils with SEN in LBHF or other maintained schools in the shared service area. Where this is not possible, the Council will utilise links with other local authorities such as Camden, Lambeth and Wandsworth to assist.

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
48	734	Local Authority		LBHF, LB of Ealing and LB of Brent (Joint Response)	Education and Health Needs Study		The 2015 London Plan identified Brent as a high growth borough and increased its housing target from 1,065 to 1,525. Given local and London wide housing need it is anticipated this target will increase further through the London Plan review. Brent Council is in the process of taking forward a new Local Plan which will seek to address these growth pressures. Identifying education need and capacity must be the result of on-going engagement taking into account growth pressures across the wider area.
48	735	Local Authority		LBHF, LB of Ealing and LB of Brent (Joint Response)	Education and Health Needs Study		In relation to the individual schools cited: Harlesden Primary School • This is the closest Brent primary school to the OPDC site. The school was expanded from 1FE to 3FE from September 2014. The school currently has spare places, but demand is expected to increase before the OPDC development is completed. There is no physical space for this school to expand further. St Marys RC Primary School • This school is situated to the south east of Brent very close to the Camden and City of Westminster borders. This school is located in the growth area of South Kilburn and it is expected that demand will increase as the Regeneration in this area continues. Ark Elvin Academy • Ark Elvin School is currently being rebuilt under the Department for Education's Priority School Building Programme. The school is located close to the Wembley Growth Area. Demand for the school is expected to increase as a result of larger primary cohorts feeding through into secondary, as well as pupils from new housing. The school may need to expand to meet this local demand. Newman Catholic College • This is the closest Brent secondary school to the OPDC site. It is a Catholic voluntary aided boys' school. Caution should, therefore, be applied to any assumptions about spare places meeting demand from the new housing. Demand for the schools is expected to increase as larger primary cohorts feed through into secondary provision. It should also be noted that there are other primary schools within Brent which are in closer proximity to Old Oak than those cited, that could be impacted by changing demand patterns due to OPDC. Consideration also needs to be given to impacts of the OPDC on SEN provision.
48	736	Local Authority		LBHF, LB of Ealing and LB of Brent (Joint Response)	Education and Health Needs Study		Ealing notes that OPDC's plans for school places depend on provision at John Perryn, West Twyford, and Ellen Wilkinson schools. These currently operate with only a small surplus capacity (2-6%) and would therefore require expansion in order to absorb the growth envisaged by OPDC. Further planning work will be necessary on each of these sites in order to establish their capacity for development and we would like additional engagement with OPDC before these plans are finalised.

Environmental Standards Study

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
68	1071	Community Group	Martin Cain	Friary Park Preservation Group	Environmental Standards Study		The lack of precise details of measures to protect environmental standards or how legislation will be enforced is a problem.

Future Employment Growth Sectors Study

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
49	737	Community Group (Business)	Andrew Dakers	Park Royal Business Group	Future Employment Growth Sectors Study		The Park Royal area is a centre of excellence for a number of sectors ranging from food and beverages to the creative industries, and includes both global brands as well as thriving SMEs and micro-enterprises. OPDC's Future Employment Growth Sectors Study found that out of the 1,700 businesses in the Old Oak and Park Royal economy, the majority of them are located within Park Royal. The study also revealed that the existing strengths are largely in industrial type activities, in particular food manufacturing, transport, wholesale, logistics and to a lesser extent the motor trade. The future growth of these industrial sectors is likely to be constrained by land capacity in Park Royal. Growth will therefore be dependent on intensification. We would concur with the analysis (extract above) on pg 30 of OPDC's 2017 Intensification study although we wonder whether the forecast decline in Motor trades is unduly pessimistic. With proactive planning to OPDC and partners we wonder whether the suitability of Park Royal as a hub for maintaining next generation Connected Autonomous Vehicles (CAVs) could be promoted and the workforce upskilled where necessary.

Grand Union Canal Massing and Enclosure Note

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
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19	137	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Grand Union Canal Massing and Enclosure Note		(Duplicate of Local Plan Comment) Supporting text (SP9 3.96) states that development will be expected to respond appropriately to the Grand Union Canal as a heritage asset. However we are concerned that this policy is not correctly pursued in the Grand Union Canal Massing and Enclosure Note (April 2017).
19	150	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Grand Union Canal Massing and Enclosure Note		We welcome the inclusion of a Local Plan Supporting Study to provide guidance on the height and massing of developments adjacent to the Grand Union Canal. However we fear that the information provided will be exploited by developers as a permitted standard that they will be able to justify regardless of the local context or the sensitivity of the site.
19	151	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Grand Union Canal Massing and Enclosure Note		The study methodology has used information from the 2007 Urban Design Compendium. The analysis of height to width ratios given in the Compendium (Section 5.1.3) refers to the enclosure of space to define different types of urban space such as mews, streets and squares. The ratio proposed in the supporting study for the building height in relation to the total canal width is 1:1.5. From the Compendium Table 5.2 we see that this is the recommended minimum ratio for the enclosure of 'Streets'. The ratio appropriate to the Grand Union Canal linear park would in fact be a square or very wide street (a suggested ratio of 1: 4 to 1.5 in the Compendium). The building heights suggested in the supporting study at the various canal sections (A, B, and C) will thus produce a much greater sense of enclosure than would be desirable in a linear park.
19	152	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Grand Union Canal Massing and Enclosure Note		At sections A and B we assume the full widths (25 metres and 32 metres respectively) relate to the current Canal and River Trust ownership with an additional 3.5 metre wide strip on the northern side of the canal for a future walkway and cycle way. Our concern is that the diagram in the supporting study will encourage developers to build right up to the boundaries of the canal whereas the creation of a linear canal park demands a much greater generosity of space and this constraint needs to be secured in the Local Plan by establishing building lines set well back from the current canal boundaries. Development along each side of the canal of five to nine storeys in height will unquestionably create a canyon like corridor with shading of pedestrian routes and greatly restricted daylight/sunlight penetration.
19	153	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Grand Union Canal Massing and Enclosure Note		There is a nearby precedent that demonstrates the benefits of widening the canal corridor where possible to create an attractive parkland setting. This is located immediately to the east of the OPDC area in the stretch of canal next to Kensal Green Cemetery. This section of canal has a towpath width from 7 to 9.5 metres producing an open and pleasant corridor with wide grass verges.
19	154	Strategic Partner	Raymond Gill	The Inland Waterways Association-Middlesex Branch	Grand Union Canal Massing and Enclosure Note		We would add that the proposed 3.5 metre wide walking and cycling strip is insufficient for the numbers that will use the canal route for recreation, commuting and travel between the different OPDC locations. For safety reasons consideration must be given to the design of landscape treatments such as granite setts/cobbles, tree planting or changes in level to allow separation of the cycle path from pedestrian only footways. A minimum 600mm soft verge at the waterside should also be provided for mooring purposes. The towpath route is a designated Quietway from Southall to Paddington connecting existing employment and suburban centres with the regenerated OPDC area. Canal and River Trust towpath improvements generally aim to create a 1.8 metre minimum width paved surface as a shared Quietway/pedestrian route but with the high volume of cycle use anticipated through the OPDC area we consider that a segregated cycle path should be 4 metres wide for a bidirectional route. We conclude that the towpath strip between the waterside and the boundary of any development site should therefore have a minimum width in the order of 8.5 metres.
56	885	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Grand Union Canal Massing and Enclosure Note		The note's purpose is to deliver an appropriate sense of enclosure to the canal corridor, through building heights and massing. Although it is mentioned in this publication as well as in the Heritage Strategy that the canal corridor is characterised by the diversity of its edges with green and hard edges, activity and inactivity, the methodology is based on the relationship between a street corridor and maximum building heights along it. The statement fails to consider the unique character and qualities of the canal corridor and its often asymmetric sections, as well as its range of typical level differences, all of which should inform the level of enclosure in the first instance. Overall, the statement is not considered to be helpful or appropriate.

Gypsy and Traveller Assessment

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
30	332	Local Authority	Steve Barton	London Borough of Ealing	Gypsy and Traveller Assessment		I am encouraged to find that the OPDC GTANA, although completed using a different methodology is in broad agreement to Ealing's own findings in the 2013 GTAA refresh. That study, while recommending that the borough should monitor accommodation needs for this community, predicted that the turn over on the current site at Bashley Road would continue to address the future needs. It remains an issue, however, in that the site itself at Bashley Road is in need of updating and is very poorly situated being surrounded by industrial premises and bounded by a railway line that is used almost exclusively for freight. The opportunity to explore the re-provisioning of the site as part of the redevelopment of Park Royal should not be ignored.

Heritage Strategy

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
56	872	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Heritage Strategy		The St Mary's Conservation Area in LBHF has been specifically included in the Existing and Proposed Heritage Designations section, although it is not actually within the OPDC area. Whilst consideration of impact of potential development in the OPDC area on the setting of St Mary's Conservation Area is welcomed, it is unusual that this is the only designated heritage asset outside the OPDC area which has been selected for any detailed assessment. For example, no reference is made to the Grade I listed Registered Historic Park and Garden at Kensal Green Cemetery which falls partly within St Mary's Conservation Area in LBHF and partly within Kensal Green Cemetery

							Conservation Area in RBKC. Consideration should therefore be given to the assessment of the settings of other designated heritage assets outside the OPDC area.
56	873	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Heritage Strategy		It is understood that the Cross of Sacrifice War Memorial at Acton Cemetery would not be eligible for statutory listing since Historic England have made clear that war memorials maintained by the Commonwealth War Graves Commission will not be added to the statutory list. Consideration should be given to local listing instead.
56	874	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Heritage Strategy		The creation of a Local List is welcomed and detailed plans should be produced to show the exact location of buildings and structures on the Local List to aid their identification. The inclusion of the former Rolls Royce Factory, Hythe Road; Scrubs Lane overbridge; Mitre Bridge; West London Line overbridge and Kew Curve Grand Canal rail bridge is particularly welcomed.
56	875	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Heritage Strategy		Network Rail's Willesden Junction Maintenance Depot on Old Oak Lane is within LBHF and is erroneously included as No. 8 in the list of current locally listed buildings. This building has never been included on the LBHF Local Register of Buildings of Merit.
56	876	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Heritage Strategy		Recognition of the significance of the shopping parade at 26-28 Scrubs Lane is welcomed, particularly since it incorporates a stone plaque bearing the name 'Cumberland Park' announcing and celebrating the name of the local area and acts as a focal point for the local community.
56	877	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Heritage Strategy		Harrow Road Character Area: this relates to individual buildings only and fails to assess townscape and urban grain of this important junction
56	878	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Heritage Strategy		Scrubs Lane Character Area: does not include Mitre Wharf – eastern part of the site that is included into current pre-app discussions - to be included into Recommendations does not assess relationship to canal corridor - to be included into Recommendations
56	879	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Heritage Strategy		Railway South Character Area: needs to consider edge of Wormwood Scrubs relationship and possible future treatment. It also needs to consider sensitive edge and relationship to canal
56	880	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Heritage Strategy		Wormwood Scrubs Character Area: needs to consider sensitivity of edges and views across Scrubs. This also needs to consider future identity of the scrubs.
56	881	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Heritage Strategy		Grand Union Canal Character Area: good characterisation, however, it is stated that there is a trend to more public activities and public spaces along the canal – how will this be managed and married with the character of the canal corridor?
56	882	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Heritage Strategy		Two further heritage classifications are proposed: "Other buildings of local heritage interest" and "Areas of local character". Their status and the nature of the "heritage interest" are unclear, e.g. does the interest relate to the architectural style, fabric, use, former users, location etc.? How will the significance of those buildings and areas be rated when it comes to the development of the area?
56	883	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Heritage Strategy		The Campbell Family Mausoleum in St Mary's Cemetery is now listed at Grade II* and this higher level of significance should be noted.
56	884	Local Authority	Matt Butler	London Borough of Hammersmith and Fulham	Heritage Strategy		The rationale for this additional layer of heritage designation has not been fully explained. The selection criteria for this designation needs further explanation. It is not clear if these buildings and structures are also intended to be treated as non designated heritage assets. There is significant potential for confusion about the level of significance that will be afforded to assets within this designation. Buildings and structures included within this designation should demonstrate clear architectural or historic interest. The justification provided for the inclusion on the list of No. 19 Chandelier Building, Scrubs Lane is particularly unclear.

Infrastructure Delivery Plan (IDP)

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
41	523	Agent	Jack Savin-Taylor MRICS	DS2 (on behalf of Old Oak Park Limited)	Infrastructure Delivery Plan		The Revised Local Plan evidence base identifies a wide range of infrastructure that must be provided across the OPDC. These are included in detail within the Infrastructure Delivery Plan (IDP). A number of those infrastructure requirements are identified specifically within the 'Old Oak North' Local Plan Place Area, the majority of which is made up of the OOP site. The IDP includes the following (the list is not exhaustive): Hythe Road Overground Station (including the new viaduct), Improvements to Hythe Road underpass, Pedestrian Bridge across Grand Union Canal, Upgrades to existing footbridge over West Coast Main Line, Old Oak High Street bridge over West Coast Main Line, Old Oak High Street bridge between WCML and crossing of West London Overground line, Old Oak High Street crossing of West London Overground Line, Old Oak High Street between underpass and bridge over the canal, New underpass – from Grand Union Street to Scrubs Lane, Delivery of Park Road (the east-west link from Scrubs Lane to Old Oak Common Lane and which includes the main utilities corridor), Delivery of Park Road underpass under the West London Line, Delivery of Grand Union Street, Bus infrastructure, Utilities (energy, water, drainage), Green infrastructure, Social infrastructure (On-site primary school, health facility, community hub). The list above simply demonstrates the range of the required infrastructure. The final cost of these infrastructure requirements has not been finalised, nor has the relevant funding source been identified who will ultimately pay for each of these. However, an indicative cost is set out within the Local Plan evidence base; within the Development Infrastructure Funding Study (DIFS) prepared by Peter Brett Associates (dated March 2015). The DIFS is also used to inform the OPDC's Regulation 123 List and is included within the evidence base for the draft CIL Charging Schedule.

Integrated Impact Assessment (IIA)

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
78	1193	Interest Group	Robin Brown	Just Space	Integrated Impact Assessment		Reg 19 response on the Integrated Impact Assessment (IIA) The draft Local Plan in respect of the sustainability appraisal process is not sound “ it is not legally compliant, consistent or justified. The consultation on the sustainability appraisal (the Integrated Impact Assessment) did not contribute to the development and sustainability appraisal of alternatives as legally required by Section 19(5) of the Planning and Compulsory Act 2004 (as amended) and Regulations 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633. See also Article 5 & Appendix 1 of Directive 2001/42/EC and the relating European Commission guidance. The IIA is not consistent with national policy, in particular NPPF paras 165, 167 and 182, and planning practice guidance on strategic environmental assessment and sustainability appraisal, and A Practical Guide to the Strategic Environmental assessment Directive (ODPM 2005). It is not justified - see NPPF para 182. The draft Local Plan cannot be adopted or submitted for adoption “ see Regulation 8 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633. Remedying these serious and fundamental shortcomings lies with the local planning authority to correct the omission to submit the plan to sustainability appraisal of strategic options. From reading the Regulation 18 and Regulation 19 versions of the IIA, it is apparent that strategic options have not been tested and published within these documents. Reasonable alternatives to the preferred approach are not set out within the plan's supporting documents. The only 'reasonable alternatives' are for the particular policy for 'affordable housing' (and are within Chapter 5 of the IIA). It is a requirement of the SEA Directive that 'reasonable alternatives' are assessed and, therefore, alternative options should have been assessed using the IIA Framework. This lack of testing of strategic options is not consistent with national planning policy and guidance. To accord with NPPG: 'The sustainability appraisal should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative.' Draft IIA Report (December 2015) Regulation 18 (page iv) states that: "The spatial strategy options were assessed ahead of the drafting of the Regulation 18 Local Plan, as they form the basis of the approach within the area . The assessment of the strategic options is presented in Chapter 5 of this draft IIA Report". As stated above, this assessment relates to one particular policy only and not to the preferred approach and reasonable alternatives. The OPDC has been to remedy this omission but has declined to do so. Representations were made to the OPDC in response to the public consultation on the IIA Scoping Report circa September 2015 and those relevant to the issue at hand which have been accurately noted in Appendix E of the draft IIA Report (December 2015) pp96-98* are repeated here: "Community members have not been involved in discussion around the scoping report; the formative stage of the development of the Local Plan, thus the opportunity for inclusion of community-based realistic alternatives to be included in the OPDC's Issues & Options Local Plan has not been proactively provided". "The European Assessment Directive or the European Union requires that realistic alternatives are assessed. Recent legal judgements have also asserted the importance of public authorities consulting upon arguable yet discarded options". "We ask that community-based alternatives “ set out in the following Vision and Objectives are assessed, with positive and negative effects identified, and included in the OPDC's Issues & Options Local Plan". *pages as printed in IIA Appendices document published for Regulation 18 and hosted on www.london.gov.uk website
100	1883	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Integrated Impact Assessment		As we understand, the SEA Directive requires that ‘...an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated’ (2001/42/EC) (Article 5.1). The OPDC Integrated Impact Assessment (Supporting study no.27) is presented as having met this requirement. We do not see any assessment in this document of reasonable alternatives on the balance of housing and jobs, nor on the level of intensification of housing development, such as were offered in the LBHF Draft Local Plan. The ‘Appraisal Finding’ on the Going Local narrative 4 on New Homes says nothing of substance (page 57).
100	1884	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Integrated Impact Assessment		We cannot find in the IIA document any evidence that reasonable alternatives have been identified or tested on the main strategic objectives of the Plan, through the Regulation 18 and 19 plan making process. Within the envelope set by SP2 and SP4 there are some policies for which alternatives have been consulted on. Paragraph 7.8.1 states The Regulation 19 Draft Local Plan aims to deliver a significant amount of new homes over the course of the plan period, and the chapter acknowledges that the OPDC area forms a significant part of meeting London’s housing need, across all tenures and needs. 6.4 And subsequently, In the main, there’s a natural conflict between increasing development densities in an area of brownfield sites and how this will impact on the existing baseline environment but other policies within the Local Plan will ensure that this effects of these are minimised as well as ensure that enhancements can be made. As noted by RB Kensington and Chelsea in its comments the Plan does not provide assurances that harmful impacts will be mitigated as opposed to minimised. Local people have little confidence on this latter assurance, being well aware how much of the infrastructure of the Old Oak area (road network, water supply, drainage/sewerage systems) are already overstretched.
100	1885	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Integrated Impact Assessment		A matrix of IIA objectives is shown at Table 5, including: To optimise the efficient use of land through increased development densities and building heights, where appropriate. The links between the OPDC Going Local and Thinking Big narratives are shown as largely ‘uncertain’. We see these two overall ‘narratives’ for the Plan as being in inherent conflict with one another.
100	1886	Community Group	Mark Walker	Old Oak Interim Neighbourhood Forum	Integrated Impact Assessment		Figure B.1.1 shows comparative population densities beyond the OPDC area and notes The OPDC area covers some 650 hectares and due to its predominantly industrial nature has a much lower population density than its adjoining boroughs. Given the proposed minimum new homes of 25,500 this density is set to change. This influx of future population needs careful management to ensure inequalities don’t worsen throughout the area and adjoining boroughs. There is no questioning or justification of this target for new homes or consideration of options for less intensive development.
110	2633	Community Group	Sharon Hayward	Grand Union Alliance	Integrated Impact Assessment		5. Failure to assess alternatives Given the scale, nature and complexity of the development strategy, it is of great concern that it has not been subjected to full application of the required sustainability procedures, which are essentially that: “The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal.” (Requirements for Soundness, Planning Advisory Service).

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
							But the assessment of the overall OPDC plan, and of strategic options, is not to be found in the IIA, only alternatives for individual policies, such as the Affordable Housing Policy. Given the significant (and indeterminate) costs, funding gap, and weak social outcomes achieved in planning applications determined to date, this IIA should be redone, considering reasonable and realistic alternative development scenarios for the OPDC area.
110	2634	Community Group	Sharon Hayward	Grand Union Alliance	Integrated Impact Assessment		We point out that the GUA objected to the lack of consultation in relation to the preparation of the IIA Scoping Report. At the time the GUA observed that the local residents had not had the opportunity to propose “community-based realistic alternatives” for the Reg 18 Local Plan. The OPDC has a “Community-Based Vision and Objectives” which should inform assessment of alternatives to the current OPDC Reg 19 local plan. This is submitted together with this consultation response.
110	2651	Community Group	Sharon Hayward	Grand Union Alliance	Integrated Impact Assessment		To a limited extent, this acknowledgement of considerable impacts and ways to mitigate and compensate for impact on local residents and businesses are explained in the IIA and Plan. The following from the IIA narrowly frames the Plan’s response to construction related considerations. “However, such a volume of development will not be without its challenges. The existing transport network, businesses and residents will be impacted by with a significant amount of change in their area over a long period of time. This natural conflict is acknowledged within the Local Plan policies, and addressed with specific policies aimed at ensuring proposed development can adequately deal with effects on residential amenity including noise, air quality and construction impacts.” (IIA, Study no.27, p. v) The degree of adequacy and soundness of the Plan in dealing with such construction impacts are the subject of detailed critical commentary elsewhere. As to mitigations and how the plan-making process has dealt with their generation, the IIA as published remains incomplete. The IIA on p52 notes on mitigation that: “Where appropriate, mitigation measures are recommended to avoid, reduce or offset the potential adverse impacts as a result of the Local Plan. In addition, potential opportunities to benefit and enhance the social, economic and environmental receptors are identified. Recommendations within Appendix G are italicized for clarity. As the Regulation 19 Draft Local Plan has been developed in parallel to the SA process, mitigation measures have been incorporated on a continual basis into the Local Plan.” Appendix G is missing from the papers presented to the OPDC Planning Committee which signed them off for Board approval of the draft for public consultation. This not been remedied as it is missing from the document subjected to public consultation.

Integrated Water Management Strategy (IWMS)

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
47	694	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Integrated Water Management Strategy		The following comments made on the Integrated Water Management Strategy supporting document have not been taken forward: 4.1.4 Developed Scenario 4. Annual Water Cycle Further detailed information should be included to understand the impact on the Counters Creek system. Figure 4-6 could be modified to include the pre- and post-development capacity in the sewer system by adding a new column.
47	695	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Integrated Water Management Strategy		4.2 Peak Instantaneous Water Flows The reference to the capacity problems of the Counters Creek and the need to reduce surface water run-off entering the sewer system to at least Greenfield run-off are welcome. This section explains that the estimated peak instantaneous sewer discharge will increase about five times. It will be useful to understand how that will affect the existing capacity of the sewers in terms of percentage.
47	696	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Integrated Water Management Strategy		Further comments to the supported document Development Infrastructure Funding Study have also not been taken forward. Paragraph 17.12 (page 123) needs amending to make clear that the Counters Creek sewer is already in place. The project that Thames Water is currently developing is the Counters Creek Storm Relief Sewer so the reference should be corrected. Also, the information provided could be expanded to explain that the potential creation of capacity in the main sewer as a result of the proposed storm relief sewer will be needed due to the forecast increased in foul water entering the system.
47	697	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Integrated Water Management Strategy		Reference to the capacity problems of the Counters Creek under paragraph 17.15 (page 121) is welcome. There should also be a reference to the proposed Counters Creek Flood Alleviation Scheme.
47	698	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Integrated Water Management Strategy		Regarding paragraph 17.25 (recommendations, page 126): the 4th bullet point should be removed as it explains that if negotiations with the Canal and River Trust fail, then Counters Creek could be considered as an alternative. This contradicts what it is said in paragraph 17.12. The Counters Creek should only be considered as the last alternative once all other options have been explored. In addition, a further bullet point could be included here to refer to innovative new ideas and processes which could reduce costs with time.
50	782	Statutory Consultee	Ben Llewellyn	Environment Agency	Integrated Water Management Strategy		We support the approach taken within the Integrated Water Management Strategy and would advocate this approach to other local planning authorities. No sites have been allocated in Flood Zones 2 or 3 and we consider the requirement of the Flood Risk Sequential Test to be met. It is clear that water management is going to present a challenge to the transformation of OPDC and we would like to offer our support in continuing this piece of work.
50	783	Statutory Consultee	Ben Llewellyn	Environment Agency	Integrated Water Management Strategy		The Integrated Water Management Strategy pages 31 – 33 details demand management scenarios and appears to heavily rely on the retrofit of water efficiency devices to existing buildings. The Strategy states that 27% savings in potable water can be achieved by carrying out these works to buildings within the Park Royal area. We fully support the aspiration of retro-fitting the water efficiency devices to achieve these

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
							benefits but it is unclear how this will be delivered. The Integrated Water Management Strategy or the Local Plan could be amended to provide options for how these measures will be delivered.
50	784	Statutory Consultee	Ben Llewellyn	Environment Agency	Integrated Water Management Strategy		The Integrated Water Management Strategy is also heavily reliant on utilising the Grand Union Canal as a receptor for clean surface water discharge. We support this from a sustainability perspective but we are concerned with the potential impacts should it transpire that there is not sufficient capacity within the Grand Union Canal or that upgrade works are not feasible. We encourage OPDC to discuss potential solutions with the Canal and River Trust and we would also like to be party to these discussions to ensure that any upgrade works or amendments to the Grand Union Canal do not preclude the delivery of Water Framework Directive improvement measures or result in a deterioration of the waterbody classification.

Public Realm, Walking and Cycling Strategy

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
68	1072	Community Group	Martin Cain	Friary Park Preservation Group	Public Realm, Walking and Cycling Strategy		While discussing the Public Realm there is no recognition of the needs of elderly and disabled people but total focus on the requirements of cyclists..
75	1156	Community Group	Henry Lancashire	Brent Cyclists	Public Realm, Walking and Cycling Strategy		We support the aim to "[create] a high quality public realm that is focused on walking and cycling."
75	1157	Community Group	Henry Lancashire	Brent Cyclists	Public Realm, Walking and Cycling Strategy		We support recommendation 5 with some reservations: "All major routes in Old Oak should have segregated cycle lanes with great connections to the surrounding area, to the potential CS10, and to existing quietway routes, to ensure cycling is an attractive means to travel. In Park Royal, existing cycle paths should be enhanced to provide safety and encourage cycling as a means of transport." - No definition of major routes is given, we suggest this should be all routes which will either serve through motor traffic, or have high pedestrian footfall. - Only "existing cycle paths" in Park Royal are discussed. This will not achieve a joined up network of routes, therefore new, high-quality, cycle infrastructure must be proposed in Park Royal.
75	1158	Community Group	Henry Lancashire	Brent Cyclists	Public Realm, Walking and Cycling Strategy		We support the proposals for new bridges and underpasses to avoid severance within the area. Underpasses must allow direct line-of-sight from entrance to exit, and high quality lighting throughout to ensure that they are perceived as safe to use.
75	1159	Community Group	Henry Lancashire	Brent Cyclists	Public Realm, Walking and Cycling Strategy		We support the inclusion of image "View looking north towards Hythe Road Overground Station from Old Oak High Street bridge over Grand Union Canal ." However, this shows insufficiently ambitious cycle infrastructure, in particular the designs shown will encourage encroachment by taxis and private cars dropping off at the roadside.
75	1161	Community Group	Henry Lancashire	Brent Cyclists	Public Realm, Walking and Cycling Strategy		We do not support the inclusion of "shared lanes" on the "Network diagram showing types of cycle paths." Shared lanes, especially on the roads shown, are unsuitable for achieving infrastructure which "cater[s] for all types of users."

Shared Housing Market Assessment (SHMA)

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
47	709	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Shared Housing Market Assessment		The OPDC SHMA, 2017 states that Greater London can be considered as a single large housing market area which contains many smaller overlapping housing market areas within it. It then relies on Broad Rental Market Areas (BRMAs) to represent the most practical and pragmatic approach to identifying housing market areas in London. OPDC falls within the Inner West London BRMA, which contains the majority of Ealing and Hammersmith and Fulham, and parts of Hounslow and Brent. On this basis the SHMA concludes that the most appropriate route to explore the needs of OPDC is by analysing the combined area of Brent. Ealing and Hammersmith and Fulham which are the three authorities OPDC is derived from. The Council supports this approach. It does not contradict the Council's position as identified in its own SHMA 2015, in that Kensington and Chelsea, whilst within the London housing market area, is its own housing market area for the purpose of defining objectively assessed need. The borough's SHMA concludes that RBKC distinguishes itself from surrounding areas on a number of critical features. House prices are not only the highest in London, but have shown the greatest increases since 2008 (72%), drawing on buyers and investors from overseas as well as the UK. In terms of migration, it only has strong links with neighbouring Westminster and Hammersmith and Fulham, but shows no further linkages with those authorities' sectoral neighbours to the west and north; and has only very weak linkages elsewhere in London. The SHMA 2015 considers that while it could be argued that there is a case for considering RBKC, Hammersmith and Fulham and Westminster as a housing sub-market, the extreme nature of RBKC's house prices, and the selfcontainment in terms of migration and commuting, justifies the case for considering the housing needs of RBKC as a single authority.
47	710	Local Authority	Jonathan Wade	Royal Borough of Kensington and Chelsea	Shared Housing Market Assessment		The OPDC SHMA, 2017 identifies an objectively assessed need (OAN) for the housing market area (the three local authorities) over the 20 year plan period 2017-37 to be 98,955 dwellings or 4,948 dwellings per annum. This includes the OAN for affordable housing of 44,400 dwellings over the same period. The planned supply of housing within the OPDC area is 25,500 homes in the same period and therefore will make a significant contribution in meeting not just the needs of Brent, Ealing and Hammersmith and Fulham but also the wider needs of West London. The Council supports the level of housing provision planned for. It is also noted that the OAN just for the OPDC area is identified as 1,200 homes over the plan period up to 2037. Therefore, the development being planned for will be significant in meeting wider needs.

Socio-Economic Baseline Study

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
68	1073	Community Group	Martin Cain	Friary Park Preservation Group	Socio-Economic Baseline Study		This study makes assumptions based on assertions that as yet have no validity such as funding for HS2 and fails to discuss development without the 3 new train stations.

Validation Checklist

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
42	609	Planning Consultant	Jonathan Smith	DP9 (on behalf of Old Oak Park Limited)	Validation Checklist		The Draft Validation Checklist evidences the cumulative weight of the requirement being placed on development within the OPDC area. For major developments, it contains a requirement for up to 54 local documents and supporting statements, which are to be provided in addition to the national validation requirements. Whilst not all documents might be required depending on the specifics of the site, for a scheme such as OOP it is likely that the vast majority will be required. We would note that this does not include the requirement for a Financial Appraisal, which will take the total to a potential 55 documents. This compares with 28 documents for major applications in LB Hammersmith & Fulham, within which the OOP site is located. This evidences the significant additional burden that the OPDC is placing on development in its area, in comparison to the existing local authorities. This is fundamentally wrong for a Development Corporation, and will serve to increase the cost and time taken to apply for and secure planning permission considerably. This also serves to make engagement in the planning process more difficult for local communities and members of the public, as the weight and complexity of documentation makes understanding and commenting on applications harder. We consider that the validation list needs to be reduced considerably. As a minimum, there needs to be further differentiation between the information required for a detailed planning application and that required for an outline application, when much of the detail sought by the Local Plan will not yet be known.
44	636	Strategic Partner	Malcolm Souch	NHS London Healthy Urban Development Unit	Validation Checklist		The Draft Validation Checklist (June 2017) requires HIA for all major developments, but distinguishes between smallscale major development (between 10 and 199 residential units) and largescale major development (of 200 residential units or more). It is not clear whether different types of HIA are envisaged depending on the scale of development.

Victoria Road and Old Oak Lane Development Framework Principles

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
27	234	Planning Consultant	Claire Treanor MRICS	Treanor Consulting (on behalf of Castlepride Limited)	Victoria Road and Old Oak Lane Development Framework Principles		The figure on page 39 should recognise the potential for a tall building on the Midland Gate site. A considered and well designed development at Midland Gate can provide a transition in scale that respects the sensitivities of neighbouring dwellings and achieves other development objectives in the draft Local Plan. Redevelopment of this site can help deliver a key piece of infrastructure and help reduce severance and contribute positively to regeneration. The proposed bridge link is part of the new High Street, a Major Town Centre and the Station Cluster identified in the draft Local Plan. The site will have access directly in to Old Oak Common Lane Station and have a future PTAL 6 rating ie the highest level of public transport accessibility. The site is suitable in principle for a tall building. The environmental implications and potential impacts on local amenity arising from a specific design and other development control considerations would be assessed against relevant policies in the Local Plan.

Waste Apportionment Study / Waste Technical Paper

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
26	212	Strategic Partner	Archie Onslow	North London Waste Plan	Waste Apportionment Study; Waste Technical Paper		Both the OPDC Waste Apportionment Study and the Western Riverside Waste Technical Paper are based on the same questionable assumptions regarding the operating capacity of the Powerday plant. Both reports use the licenced capacity of Powerday as the operating capacity of the plant over a number of waste streams. However licenced capacity is related to the enforcement of the environmental permit and is not a reliable guide to actual throughput. The Technical Paper demonstrates for almost every facility surveyed across the four Western Riverside boroughs where a comparison is made between the tonnage in the permitted capacity column and that in the actual inputs columns (see tables 12, 17, 22 & 28), the actual tonnage is lower. This method of using licenced capacity as actual capacity is not used in the Technical Paper for any other facility in the WRWA area. Instead the Technical Paper uses an average of actual throughput figures. Table 17 of the Technical Paper indicates that the highest actual annual throughput achieved at Powerday was 359,643 tonnes across all waste streams. Both reports agree that the majority of this waste is CD&E. Yet the Technical Paper suggests that Powerday can provide 681,000 tonnes capacity for LACW and C&I for meeting Hammersmith and Fulham's apportionment while the Apportionment Study suggests that 426,000 tonnes are available. The Reports refer to the planning requirements for how waste is transported to the plant. These requirements are part of its operating environment of the plant and there is no evidence presented that these are to be changed. A more realistic figure of available capacity for LACW/C&I would be to take a proportion of the highest throughput actually achieve. Para 3.19 of the Apportionment Study uses as a proportion the highest recently achieved of 42%, Using the 359,643 tonnes maximum figure would give an available capacity of around 150,000 tonnes. A further exercise would then need to be done on how much of this throughput counts as managed waste under the London Plan definition. Either way this is below the LBTH apportionment target. A case could be made for a higher available capacity if it could be backed up by evidence. There is nothing in the Local Plan or any of the Reports indicating any reason at this stage that Powerday will be able to get more contracts to manage more LACW or C&I . Both host Waste Disposal Authorities have long term contracts in place with other operators to deal with their residual LACW, both by incineration. In the Technical Paper, the capacity of the Powerday plant to manage CD&E is derived by subtracting the capacity deemed to be available to manage LACW and C&I from the licenced capacity. This is flawed for the reasons set out above and is also not backed up by any other evidence in the Paper. Additionally the paper admits that it double counts transfer capacity across the three main waste streams.

26	213	Strategic Partner	Archie Onslow	North London Waste Plan	Waste Apportionment Study; Waste Technical Paper		While the possibility of the Powerday plant having a role in the district heating system is raised again, there is still no detail in the Local Plan on how the district heating scheme at Old Oak will operate.
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Willesden Junction Station Feasibility Study

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
90	1446	Local Resident	John Cox		Willesden Junction Station Feasibility Study		The supporting document 'Willesden Junction Station Feasibility Study' is not sound. Since it apparently "inform[s] the strategy and policies in OPDC's revised draft Local Plan", that is also unsound.
90	1447	Local Resident	John Cox		Willesden Junction Station Feasibility Study		It is not positively prepared, since pages 21 to 62 presuppose that the two existing bay platforms at Willesden Junction station can be sacrificed. The reasoning regarding that is unsound, and in contravention of the requirements of English common law, including but not limited to R v Brent London Borough Council, ex p Gunning, (1985) 84 LGR 168, and R (on the application of Moseley (in substitution of Stirling Deceased)) (Appellant) v London Borough of Haringey (Respondent) [2014] UKSC 56, on appeal from [2013] EWCA Civ 116.
90	1448	Local Resident	John Cox		Willesden Junction Station Feasibility Study		There has been no consultation at a formative stage of reasonable and proportionate alternatives. That must include consulted options that retain the existing bay platform capacity.
90	1449	Local Resident	John Cox		Willesden Junction Station Feasibility Study		The document's strategy is not seeking to meet objectively assessed development and infrastructure requirements. That must include those put forward by the public, given Network Rail's lack of credibility in forward planning, since its decisions are tightly controlled by the Treasury, which is happy to 'sell off the family silver', using the description of reckless short-termism used by ex-Prime Minister Harold MacMillan.
90	1450	Local Resident	John Cox		Willesden Junction Station Feasibility Study		I was unaware of any consultation, despite having lived in the area for forty years, and being (a) a member of Harlesden Town Team, (b) chair of the Interim Stonebridge and Park Royal Centre Neighbourhood Forum, and (c) an associate (out-of-area) member of Harlesden Neighbourhood Forum, which is presumably what is meant by the reference to an organisation on page 66. In any case, the Harlesden Neighbourhood Forum should not be considered as the only body to be consulted, particularly since it failed to advertise the consultation meeting, and in particular, seems to have been happy with discussions based purely around pages 21 to 62. Consultation on this Feasibility Study does not meet the standards of the OPDC 'Statement of Community Involvement', and is unfair.
90	1451	Local Resident	John Cox		Willesden Junction Station Feasibility Study		It is also not positively prepared because the London Plan and strategic plans of many London boroughs note the predicted increase in the population of London. There are reasonable unmet requirements of neighbouring authorities that follow from that, in strategically increasing railway capacity and seeking modal shift from cars. In particular, it is reasonable and proportionate to consider much greater capacity at Willesden Junction station (the 'Maximal Option', as I will call it) which this OPDC document should cover, and which can then be scaled back to only build the affordable and appropriate parts of that maximal plan in the shorter term. That smaller project will still need to explain how the long-term plan is possible, in terms of access to, and interchange between, the many extra future station platforms, piling locations for possible over-track developments, and locations of long-term station entrances, so the whole station loses the 'make-do-and-mend' chaotic design it has had since it opened in 1866 (unfortunately on a site that is split between what are now three 1965 London boroughs). The document completely fails on that score, perhaps because it is unacceptably influenced by a desire of Transport for London (TfL) to merely update its recent very modest improvement plan.
90	1452	Local Resident	John Cox		Willesden Junction Station Feasibility Study		Finally, it is not positively prepared because it is not consistent with sustainable development at a level that provides every possible but feasible rail route in London. Some of those would not be possible because of unacceptable capacity restraints imposed if the current OPDC document were to be accepted. That is unfair.
90	1453	Local Resident	John Cox		Willesden Junction Station Feasibility Study		It is not justified, because it is not the most appropriate strategy. When considered against reasonable alternatives, based on proportionate evidence, it is unsound.
90	1454	Local Resident	John Cox		Willesden Junction Station Feasibility Study		I am not trying to spend more money. The overall OPDC infrastructure costs are already 'challenging'. But there needs to be a maximal strategy produced, that the station is capable of complying with, if and when the OPDC's development plans, as well as those elsewhere in London, require higher-capacity infrastructure at Willesden Junction station. That is not happening.
90	1455	Local Resident	John Cox		Willesden Junction Station Feasibility Study		(a) Consider, first, the low-level 'DC lines' at the station. There have been many, many proposals for mixing, extending and separating London Overground and Bakerloo Line services over the years. For the Elephant & Castle to Harrow & Wealdstone Bakerloo Line service, it could gain another branch from Queens Park, be extended north to Watford Junction, and (very likely) be extended south to Lewisham and maybe Hayes in Kent. Its northern reach could be shortened to just either Stonebridge Park or Wembley Central; its main depot is between those two stations. For the Euston to Watford Junction London Overground service, it could be redirected from Euston to Primrose Hill and Camden Road. Some London Overground East London Line services could be extended from either Dalston Junction or Highbury & Islington, via Primrose Hill (after four-tracking Camden Road station, to keep them physically separate from the London Overground North London Line) to either Queens Park or Willesden Junction low-level station. In the north, a chord from the Chiltern Line Aylesbury branch at Northwick Park, on the border of the LB of Harrow and LB of Brent, would allow extra London Overground services via Harrow-on-the-Hill to Willesden Junction, to connect Buckinghamshire with HS2 and Crossrail (with a healthy walk or bus ride along the new Old Oak High Street). (This week, the West London Alliance of London boroughs published its 'West London Orbital Railway' plans. That could potentially route Aylesbury trains via the Dudding Hill Line instead, with a new, easy interchange at Wembley Park station for the Metropolitan Line and Jubilee Line. This might also allow existing Aylesbury branch trains to avoid overcrowded London Marylebone station. However, it would require grade-separation over the Chiltern Main Line at Neasden.) To summarise, four-tracking at Willesden Junction low-level is a feasible and desirable outcome of redevelopment. As well as offering

Res. Ref.	Com. Ref.	Respondent Type	Name	Organisation	Supporting Study	Para/ Figure	Comment
							general flexibility, it would allow space for terminating East London Line and Aylesbury branch trains. There is already a small London Overground depot at Wembley yard, south of Stonebridge Park, and trains could be serviced there if the site were expanded. (That is also a possible replacement site for the current London Overground depot immediately to the south-east of Willesden Junction station.)
90	1456	Local Resident	John Cox		Willesden Junction Station Feasibility Study		(b) Consider next the high-level North London Line platforms at Willesden Junction. London Overground share the route with considerable freight traffic. There are two platforms, on a sharp curve. (There used to be third, with an even tighter radius.) Possible additional London Overground services include extending Barking to Gospel Oak trains as far as Willesden Junction, or perhaps beyond via the proposed Old Oak Common Lane station, to an existing unused platform at Acton Main Line Crossrail station. That would turn 'Acton-to-Barking' into a major orbital route. From the other direction, some West London Line trains could terminate in, and return from, a high-level platform, instead of running on into a siding. The expensive third platform on the proposed Hythe Road London Overground station viaduct would also then no longer be required. A new service from Hounslow, Isleworth, or elsewhere in west London could run to the high-level station, instead of on the reopened Dudding Hill Line. To summarise again, four-tracking at Willesden Junction high-level is equally desirable. As well as offering general flexibility, it would give space for terminating Barking and west London trains. There is space to narrow the existing island platform, with a new west-bound track on the existing platform 4. The fourth track and the second island platform would be sited on the outer edge of the curve. New bridges over at least part of the West Coast Main Line (WCML) would be needed
90	1457	Local Resident	John Cox		Willesden Junction Station Feasibility Study		(c) Finally, consider passenger services on the main line, made up of the West Coast Main Line slow lines nearest the existing station, shared with many freight trains, and the fast lines. Beyond all those are the chords to the West London Line, used by two Southern trains an hour, running between Milton Keynes and South Croydon. That chord needs two platforms at Willesden Junction, and feature in OPDC images and animation. The main-line platforms were removed in 1963. The arguments for reinstatement centre on the changed use of the WCML after High Speed Two opens. The existing route will carry increasing traffic of freight trains, home counties commuter traffic, and 'budget' longer-distance trains. Some Beeching Axe branches might also reopen. It is almost certain that all Great Western Main Line (GWML) Paddington trains will stop at the eight platforms provided at Old Oak Common (OOC). Not to do that would greatly reduce line capacity, due to decelerating and accelerating trains. There is also the attraction of passenger certainty that interchange at OOC is always possible, even for a train from, say, Penzance or Swansea. There is negligible freight traffic on the line at OOC. As with the GWML, so with the WCML. Assume that 'Crossrail-to-the-WCML' never happens, a reasonable assumption. Then two platforms for each of the main-line tracks, not just one, are desirable. That would allow operational flexibility (notably it is not being provided at the rebuilt Watford Junction station, where some Crossrail trains would have terminated). It would also allow all passenger trains to and from Euston to stop, giving the same certainty as at OOC, and ability to reach any OOC station and other north London destination without using Euston. WCML freight trains via Primrose Hill could bypass other trains at Willesden Junction, if necessary.
90	1458	Local Resident	John Cox		Willesden Junction Station Feasibility Study		Totting up, that's four low-level platforms, four high-level ones, two West London Line chord ones, and eight WCML ones. If London expands and the OPDC succeeds, that feasibly and reasonably is what might be needed within two or three decades. It is a proportionate possibility that the OPDC Local Plan supporting document does not address and compare to other, less ambitious scenarios. That makes the document unfair under common law. It should be redrawn and rewritten. If the above 'maximal' station is found to be unrealistic (with evidence), or realistic, but incapable of being turned into a 'minimal, compatible' version that can feasibly be financed and built in the shorter term, then so be it. But just because the current document could be called 'Effective' in the Local Plan just offers a necessary criterion – it is not a sufficient one. And to be 'Consistent with National Policy' bears the same handicap. A lightning-rod test of the current document is simple, though – the destruction or survival of the existing two bay platforms in Willesden Junction's low-level station