**Grand Union Alliance**

01.04.16

**Response to OPDC draft Local Plan February 2016**

Grand Union Alliance brings together a network of resident and community groups and individuals mostly from within and around the OPDC area. It aims to influence large scale developments, strengthening a diverse range of local voices. It aims to ensure local groups are well informed, fully consulted and engaged in the decision-making about development plans for this part of London. Collectively it wants to see plans developed that will sustain existing communities, enhance and respect what local communities currently value in their neighbourhoods and which will mitigate the impact of developments. It encourages local initiatives that support bottom up planning.

Grand Union Alliance does not aim to supersede existing local groups or networks but rather to facilitate them coming together to exchange across borough boundaries.

This response is collaborative rather than a definitive collective response - drawing together a wide range of comments from representatives of resident and community groups that have engaged in relevant discussion at Grand Union Alliance events specifically: meetings held on the draft Old Oak and Park Royal Opportunity Area Planning Framework, the draft OPDC Statement of Community Involvement, the draft Integrated Impact Assessment Scoping Report, the draft Local Plan (regulation 18) and related evidence base documents and a community charrette held in 2015. Please find at the end of the document a list of groups who attended these events and whose views and comments will have been drawn on to produce this response.

The response focuses principally on the draft Local Plan’s vision and objectives, OSP4, the thematic policies and delivery and implementation. GUA has encouraged GUA members, friends and contacts to make their own responses to consultation (in addition to this collaborative response) and in some instances other networks that have come to make collective responses.

1. **General comments**

Detailed local justification for the proposed long-term delivery targets for housing and jobs (derived from the London Plan) is completely lacking and should be sought as a matter of urgency. The volume of development proposed seems a poor fit for this specific site and location in London.

As the relevant planning authority, OPDC needs to take equal responsibility for existing land uses and provision for the existing social needs of current residents (the baseline socio-economic study estimates 3900 people live in the OPDC area), as for future planned communities and land uses. Many aspects of the current provision for residents are inadequate and need to be considered together with future planning for any new residents and firms.

There is currently no inclusion in the draft Local Plan of a mitigation strategy, or planning for addressing the impacts of construction and development on existing residents, including the impacts of major transport developments (HS2, Crossrail). The Mayor is responsible for the health of residents in London, and the GLA Act specifically enjoins that any of his actions should not cause harm to residents. Attention needs to be given urgently to plans for monitoring and assessing the impacts (pollution, noise, loss of value in property, loss of green and open spaces, loss of playgrounds, closed roads, traffic increases) of the planned developments on current and future residents, including in the construction phases. The discussion of Sustainable Development should include attention to the sustainability of the construction phase, and should address removal and transport of construction waste, including that from HS2 and Crossrail. Intensified use of an already overwhelmed road system indicates the need for attention to planning the transport infrastructure for the construction phase, and to a concerted effort to reduce road traffic, to refuse permission for the use of the conveyor belt proposed by HS2 and to provide for canal and rail transport in construction phases.

The option of beginning the development later in the infrastructure development process (as discussed in the DIFS) in order to realise a stronger CiL and S106 income stream should be reviewed along with realistic options for a series of smaller scale developments at a lower density development with a less substantial infrastructure requirement. It is not clear that with the proposed densities (much higher than London Plan maxima) and the expensive infrastructure requirements this scale of development envisaged here will be realistic, and realistic alternatives should be assessed.

Long term risk: Borrowing against future CiL and S106 income streams, or against uplift in business rates places a large burden on public bodies concerned should the predicted growth of London’s economy not be realised; or if other competitive locations in London or along HS2 prove more attractive than Old Oak, or come on-stream sooner. Since these income streams anyway detract from the provision of services across the neighbouring boroughs any losses will adversely affect future generations, and risks need to be assiduously reviewed. The flaws in the London Plan assumptions of continued employment growth and economic expansion, underpinning the overall strategic objectives in this Local Plan, to promote growth (OSP1) require a measured assessment. It is not felt that planning for continued uninterrupted growth over the time period of this local plan rests on accurate or sensible assumptions about the risks facing London, the UK, and the global economy.

1. **Spatial Vision and Objectives**

A model (or collaborative) GUA community based ‘vision and objectives’ was produced in response to the consultation on the OPDC draft IIA Scoping Report. This response was submitted to the OPDC by the GUA and a number of its individual member groups (either in full or amended to accommodate views of specific groups).

**VISION**: The OPDC vision is minimal. It does not acknowledge the existence of the long established communities within and surrounding the OPDC area. It fails to set out a future projection of the area that looks to meet the needs and aspirations of those communities, many of which are from deprived neighbourhoods (lower super output areas in the wards of Stonebridge and Harlesden in Brent and College Park and Old Oak in Hammersmith and Fulham being, according to 2015 data, in the 10% and 20% most deprived in the country) as well as comfortably facilitating the integration of new communities.

It is proposed that a shorter version of the community based vision (mentioned above) would more effectively achieve this – as follows:

*‘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 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****.’***

**OBJECTIVES**: The objectives need set out how such a vision might be achieved – at the very least acknowledging the needs and aspirations of long-established communities within and surrounding the OPDC area. They should include greater acknowledgment that some of what the OPDC will be doing is enhancing, supporting and protecting what is already there rather than just ‘creating’ (particularly in relation to existing neighbourhoods and a unique sense of place - relating to the Grand Union Canal, Wormwood Scrubs, Park Royal and heritage assets).

1. **Overarching spatial policies**

**OSP4: Densities and building heights:**  The linking of both density and building heights in this policy would suggest that one is inseparable from the other.

London Plan policy 3.4 (Optimising housing potential) says it is important that higher density is not automatically seen as requiring high rise development. However, it seems that in terms of the numbers of homes proposed in Old Oak, this will almost certainly, in most instances, be the case.

While it is clear that the London Plan density matrix is not intended to be used mechanistically, an average density of 447 units per hectare (for the 57 hectares of proposed housing land) is way above the top of the Central London range. Some are proposed as being ‘super-density’ - in the range of 600 units per hectare - which is surely unacceptable in this location. This would suggest that statutory space-standards of these super-density homes could be compromised and the likelihood that the numbers of affordable family-sized homes needed (to meet evidenced need) would not be achieved.

There is huge fear that a framework will be created within which extremely tall, super-dense housing will significantly overshadow and dwarf the existing norm. This will make it impossible to create lifetime neighbourhoods that meet the needs of - long established communities in and around the area alongside the wider needs of the three boroughs and a proportion of London-wide need.

Presumably the London Plan SHLAA 2013 modelling was used to assess potential capacity to deliver homes in the Old Oak and Park Royal opportunity areas; however, it is difficult to see that thorough capacity studies (taking local circumstances into full account) have been carried out to assess whether the numbers can be fully justified.

While the London Mayor and his officers have at times referred to the area as a potential ‘mini-Manhattan’ or new ‘Canary Wharf’, an attempt to deliver such high numbers of extremely high and dense housing in Old Oak would, it is argued, be contrary to policy 7.7 (Cb and Cc) of the London Plan. It is doubtful, given that the general housing types in and around the area are street properties (with the exception of high rise buildings around North Action) that tall, indeed very tall buildings, here would relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features) and would not adversely affect, in terms of scale, mass or bulk of a tall buildings planned, the character of the existing area.

The Development Capacity Study doesn’t offer any help with this, but rather, simply applies the London Plan Old Oak and Park Royal Opportunity Area targets and supplies a solution of how to squeeze these preordained numbers in. It proposes areas of ‘highest’ buildings - including of ‘over 20 storeys’ but is not more specific on exactly how high they might be. There have been suggestions of heights of buildings being 40 to 60 storeys or more high. Why has the DCS not been specific on proposed building heights? This must be tested to assess the number of homes that might be accommodated. There are huge concerns that the OPDC is just not being honest about these proposals.

In addition, consultees are not clear about exactly which areas of land the OPDC is and isn’t looking at to deliver housing. Outside of the consultation, there has been a press release around potential rafting over stations to provide homes and also suggestions that, at the same time, this might be prohibitively expensive. Given that the DIFS already suggests that delivery of affordable homes might be sliced to less than 50% of what is required - to deliver the infrastructure needed, this is extremely worrying.

If the result is to be over-developed, over-dense housing that fails to address need, and which potentially has detrimental impact across West London, the vision and this overarching spatial strategy needs to be reconsidered.

It is essential that a detailed evidence base study is carried out to provide:

1. detailed analysis on land available for housing supply;
2. exact assessments of building heights and density levels across the OPDC area;
3. detailed analysis on the number of affordable and family sized homes that will be provided and where necessary -
4. adjustments need to be made to the numbers of homes being planned.

Consultees must have full and detailed information on these issues and indeed on the growing identified gaps in infrastructure funding – in order to make informed responses to consultations.

When the top end of the housing market is collapsing in London, isn’t there a need to consider whether developing more high-rise luxury development, as appear to be being planned here, is actually realistic.

1. **Thematic policies**

**SD1 SUSTAINABLE DEVELOPMENT:**  The preferred policy option should reference the five guiding principles of the UK Sustainable Development Strategy *Securing the Future* and the three dimensions to sustainable development that are set out in section 7 of the NPPF. The policy should also say that these roles should not be undertaken in isolation (rather than this being noted in supporting text).

It is requested that the OPDC specify how it will monitor delivery of the three roles in terms of development, in an open and transparent fashion.

**DESIGN**

D1: Strategic policy for design: Proposals should also demonstrate that accessible and inclusive, sustainable lifetime neighbourhoods will be delivered. An alteration (highlighted in bold) to the first sentence is proposed: ‘Proposals will be supported where they demonstrate the delivery of **high quality sustainable architecture to be delivered in high quality liveable, accessible and inclusive, sustainable lifetime neighbourhoods that are accessible to people of all ages, ability and incomes** that:’

The justification is that it is an important signal to developers that every development must be accessible and inclusive to comply with London Plan policy 7.2 an inclusive environment

D2: Streets and public realm: The following additions are suggested to satisfy community aspirations relating to developing accessible and inclusive neighbourhoods:

* 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.
* 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.
* 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.
* Develop a strategy for high quality accessible and inclusive hard and soft landscaping throughout the OPDC area.

The justification is that it is an important signal to developers that every development must be accessible and inclusive to comply with London Plan policy 7.2 an inclusive environment

An alteration to section **(b)ii** is proposed (as follows) to clarify that better connections are required both within the OPDC Area and with neighbouring communities – ‘contribute **sensitively** to connecting places **within and immediately neighbouring** the OPDC area and creating new public realm’

D3: Open space: To support in the development of lifetime, all age, accessible and inclusive neighbourhoods it is proposed that policy should require dedicated new large and small scale green and open space for play, recreation, healthy exercise, meeting places, greenery, urban wildlife should be located within and adjacent to housing developments. These need to be flexible and adaptable.

The justification is that it is an important signal to developers that every development must be accessible and inclusive to comply with London Plan policy 7.2 an inclusive environment

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.

Required standards for the scale of development in Old Oak must be provided excluding the Scrubs and Kensal Green Cemetery.

The following addition to the policy is proposed to facilitate the development of accessible and inclusive open space:

* To the end of **(b)v** ‘of all ages, abilities and incomes’.

The justification is that it is an important signal to developers that every development must be accessible and inclusive to comply with London Plan policy 7.2 an inclusive environment

D4: New buildings: Please see comment made on **density** in section on OSP4.

**Tall Buildings:** There is no appetite for extensive high rise development. There is concern that the high-rise buildings are ruining skylines and are negatively affecting liveability.

There is concern that tall buildings within the OPDC area will negatively impact communities living in the boroughs adjacent to the development area; that could result in a rapid growth of high rise buildings spreading out from the OPDC area. It will negatively impact on views and sightlines looking east from Ealing, north from Hammersmith & Fulham south from Brent and West from Hammersmith & Fulham and Kensington and Chelsea. It is essential that tall buildings are developed well away from areas where overshadowing may impact detrimentally on flora and fauna – such as the Scrubs and the Grand Union Canal.

As already highlighted in response to OSP4 there should be a process of optimising density rather than making density and high-rise inseparable in the Local Plan.

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.

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.

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.

Policy D4 should have an additional section that focus on the following elements relating to design of new buildings:

* Creating neighbourhoods that have a sense of community ownership and security where children, older people and disabled people can feel safe; provide adequate community-oriented facilities and meeting places to support engaged and empowered communities.
* Create adaptable and imaginative buildings that are designed to last for 150 years and use best materials and techniques in terms of sustainability.
* Create neighbourhoods that are accessible and inclusive, thriving, human and beautiful, providing for whole communities with the spiritual makers, facilitators, educators and carers at their heart.

The justification is that it is an important signal to developers that every development must be accessible and inclusive to comply with London Plan policy 7.2 an inclusive environment

D6: Heritage: To assist in conserving, enhancing and celebrating the historic significance of the area, it is suggested that the following are added to section (**a**):

* (iv) ‘survey’ and create a local list of buildings of merit’
* (v) ‘memorialise the local vernacular industrial and social heritage’
* (vi) promote community ownership of strategies and places (including a canal-side hub) on the history and culture of the area

It is suggested that section (**b**) is altered to -

* ‘Proposals will be required to conserve and/or enhance the significance of heritage, contribute to **respecting and celebrating the proud (industrial) history of the area as a starting point for new development and** contribute to successful place-making

D8: Inclusive design: To promote greater inclusivity add to (**a**) after inclusive ‘in terms of age, ability/disability and income’

In addition: There should also be a policy on good lighting design to avoid light pollution. Outdoor lighting can be relatively dark sky friendly. Arup’s ‘Rethinking the Shades of Night’ might be very helpful in this respect.

**HOUSING:** Huge concerns have been expressed around ‘unaffordability’ of housing generally – even of housing types that are deemed to be affordable. The SHMA highlights high levels of need for affordable housing, with high levels of overcrowding (at 26% in Brent Ealing and Hammersmith & Fulham) and hidden homelessness (which grew in the housing market area by 93% between the 2001 and 2011 censuses). This serious need is exacerbated by reductions in housing benefit, making private rented housing even less accessible to low income households. This is very worrying given the very high levels of insecure private-rented housing (around a third of which is ‘non-decent) within the housing market area, particularly in Brent, this is very worrying.

Additional concerns have arisen in discussions about the national Housing and Planning Bill; particularly that requirements will delivery of affordable housing will focus principally on starter homes for sale which, according to Savills, will only meet the need of the top third of households in the capital. This has led to suggestions that there is a need to consider alternative scenarios for delivering the types of homes that will meet evidenced need.

As the OPDC is keen to be innovative, it is felt that provision of a an evidence based document that looks at range of options around using public land in the OPDC area to deliver housing that is genuinely affordable and might meet need, is suggested.

H1 Strategic policy for housing: OPDC must address first local need (within the three boroughs) with any of London’s wider requirements being addressed after this. Some suggested changes to the draft text are set out below.

* OPDC will work to ensure the area plays a crucial role in delivering a range of housing that will: **assist in creating new Lifetime Neighbourhoods**, **address the housing requirements of the three boroughs of the OPDC area** **and help in addressing need London’s wide.**
* add to (a) **and protecting existing homes of established communities in the OPDC area**
* add to (b) a wide variety of ‘**objectively assessed’** needs **and which deliver a range of long-term secure tenures that meet a variety of needs** and….

H2 Housing supply: It is essential that a full assessment of the capacity to deliver homes in the OPDC area is carried out – as set out in section 3 above - alongside the Strategic Housing Market Assessment. Community representatives are keen to understand the processes taken to arrive at original Old Oak and Park Royal Opportunity Area targets as set out in the London Plan.

H3 Housing mix: The bedroom size mix for affordable housing set out in this policy looks good. It would be good to also set targets for market housing mix and to set out how these will be achieved and monitored.

H4 Affordable housing: The first of the four options around setting targets looks good – but will require a strong evidence based viability assessment to be carried out as soon as possible.

The OPDC should operate an open an book policy relating to relating to any pre-application advice provided to developers, and public bodies [i.e. Network Rail / TFL] and on negotiations around viability of schemes (particularly regarding affordable housing proposals and section 106 agreements);

Again, there is concern that the DIFS would seem to suggest an option for delivery of only 20% affordable housing in order to reduce the funding gap in terms of delivery of social infrastructure. Brent and Ealing have targets for 50% of affordable housing targets and Hammersmith and Fulham draft plan suggests 40%, so there would seem to be no reason that the OPDC should not set a similar target.

There is concern about the possibility of delivering intermediate homes that do not meet national space standards.

If the current Housing and Planning Bill is passed, the OPDC must have a plan B.

H5 Existing Housing: This policy should support retrofitting of existing homes. In the event that any existing homes were to be lost, it would be good for the policy to specify that the same space standards, bedroom-size and tenure should be re-provided for each household.

H6 Private Rented Housing: suggested amendment to H6 d) 1st line insert “accessible and inclusive” between “of” and “design” . The justification is that it is an important signal to developers that every development must be accessible and inclusive to comply with London Plan policy 7.2 an inclusive environment

There is concern that delivering relative short-term private-rented housing -

* creates transient communities rather than sustainable lifetime neighbourhoods;
* does not meet the need for low cost social-rented homes and
* makes it difficult to plan adequately for the future social infrastructure in the area – particularly of school numbers, health-care and other social infrastructure.

There is some support, however, for improving provision of better quality private housing with longer term tenancies – but also some worries around the realities of institutional private-renting – ‘motivated solely by making a profit’ and ‘the continuation of so much of the sector being short-term buy-to-let’.

There is keenness to ensure that private renting forms only a relatively small part of a more balanced delivery of secure longer-term housing and that policy protects against high concentrations of this this type of housing.

H9 Gypsy and Traveller Accommodation: There are concerns that the needs of gypsy and travellers. at the very least within the OPDC area, are slipping through the net - between the Government new definition of ‘travellers’ for purposes of planning policy (that might be covered by a Gypsy and Traveller Needs Assessment) and the requirement to have needs of those who don’t fit within the new definition to be assessed within the SHMA. In the instance of Bashley Road site, the draft GTNA assesses no future need for additional pitches (despite more than half of the persons living on the site being children or teenagers) while the SHMA suggests that gypsy and traveller needs will be assessed in the GTNA. Given that it is ORS that has completed both assessments we feel the assessment to be totally inadequate.

A further concern is that ORS has frequently contacted the London Gypsy and Traveller Unit in respect of GTNAs carried out in other boroughs - including in Lewisham, Greenwich, Hackney and Newham, but has not made contact with them in respect of the OPDC area.

The Bashley Road site has many serious management issues – including noise, vibration and pollution problems relating to adjacent industry within the Park Royal area; has serious drainage problems and associated health and safety problems (including having rats on the site). The site is also at serious potential risk of new railway lines going through the site and of having HS2 sites all around it.

This is a community that continues to be treated with inequality and whose current and future needs are just not being addressed.

A full and proper needs assessment must be carried out, the Local Plan must be clear about the potential future of the Bashley Road site and if, as seems to be the case, the site is at risk a new site with sufficient pitches to meet existing and future need must be identified.

H10 Student Accommodation: suggested amendment to H610 a) iv) ) 1st line insert “accessible and inclusive” between “highest” and “design” and delete “quality”

The justification is that it is an important signal to developers that every development must be accessible and inclusive to comply with London Plan policy 7.2 an inclusive environment.

There is some worry about the over concentration of student housing at North Acton.

Proposed additions to the policy –

* the accommodation should anyway be affordable (and affordability should be defined);
* student accommodation should not be developed in areas where other private rented accommodation is located to prevent higher levels transience;
* the OPDC should specify what it means by localised over-concentration of student housing.

**EMPLOYMENT**

E1 Strategic policy for employment: The broad strategic approach in terms of land use – retaining SIL in Park Royal and promoting mixed use in Old Oak – is supported, but with the following concerns noted, especially concerning the assumptions concerning growth, the demand for intense commercial developments, and the nature of future economic activities in Park Royal and Old Oak:

1. 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. The targets for “new jobs” should be clarified in relation to sustaining the existing jobs and businesses in the area; it should be clear the goal is “net jobs”; the priority should be not to lose jobs if possible. The 300 businesses and 6000 jobs in Old Oak and the HS2 reserve form the kernel of significant existing employment and economic vitality in the area, based on a set of well-established clusters (8.7 – logistics, props and film; food; vehicles sale and repair); strategic policy should seek to support and expand existing valued economic uses. Justification point 8.9 (p. 190) notes “OPDC must consider how to accommodate and support new and existing economic sectors as they grow and develop as well as retain those which are successful”. Stronger attention needs to be given to supporting and retaining existing jobs and firms which contribute to the effective operation of the local and London-wide economy. 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.
2. What business sectors will the OPDC seek to attract, and what would be the design/operational requirements? The overall London-wide demand for additional office and commercial space, and for it to be located in Old Oak, has not been firmly established; and we note that the latest figures from GLA employment projections have not been drawn on in the Industrial Land Review. It should be noted that most successful clusters of economic activity emerge organically (such as Tech City); wherever possible top down planning should not undermine those business and activity clusters which have emerged successfully but should also be aware of the ways in which economic growth and expansion emerges in specific locations in cities – simply providing office space is no guarantee of a dynamic local economy.
3. What kinds of jobs are being envisaged and how will developers be held to account for the provision of appropriate work spaces and supporting appropriate kinds of employment? More generally, the range of potential sectors for development is not yet established, nor is the justification of demand for different kinds of workspaces yet determined. Why should Old Oak attract new sectors when other locations in the East of the city have already proven attractive to strong concentrations of e.g. biomedicine, cultural industries, clean tech, 3D printing? Is there scope for additional concentrations of these sectors? It is worth noting that it was the cultural and economic diversity as well as the affordability and diversity of workspaces which stimulated these concentrations. How will the development cope with an economic downturn? How will the loss of London’s role in the global financial sector, perhaps on Brexit or with the rise of competitor centres in Asia, affect demand for office space over the next 20 years?
4. 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).
5. The long term development of the OPDC envisaged in this plan will provide residential, commercial and industrial uses in close proximity. Looking across the OPDC area currently, there is variable success in accommodating these different land uses. To some extent local residents appreciate the interesting industrial heritage and the gritty and diverse industrial uses in the present time. However, there are also some very poor arrangements in place eg the building material transports using Channel Gate road, abutting residences, at 1-2minute intervals; existing Crossrail traffic; the envisaged road based transport associated with HS2; construction related transports over the next 20-30 years. Future Park Royal land uses abutting residential areas in the East and North of the site could focus on clean and mixed uses. Existing inappropriate land uses which severely impact current residents should be urgently reviewed. Intensification and regeneration and open workspace developments could focus on these areas (Wesley Estate; TITRA; Bashley Road site).
6. The future uses of HS2 reserved land in the North East of Park Royal should also focus on forming an appropriate interface between general industrial and residential land uses.
7. Monitoring of changes in employment, business activity and land use is essential throughout the OPDC lifetime.

**Alterations suggested:**

**8.1.** Bring forward to here, the statement from 8.12 which proposes a more suitable overall strategy and offers more clarity in relation to existing activities: “The NPPF requires Local Plans to support existing business sectors and plan for new or emerging sectors”.

**Preferred Policy Option** An additional point is proposed d) ‘Regularly monitor changes in business activity and employment throughout the wider OPDC area with a view to ensuring that appropriate support is offered to existing firms, residents and activities negatively impacted by the developments in terms of land values and loss of business. Proposals for remedying these adverse consequences will be brought forward in agreement with affected parties.’

E2: Old Oak

1. Support and retention for existing businesses, especially those closely integrated with Park Royal and with neighbouring opportunities should be a priority. See point (1) above.
2. Affordable and diverse business premises in Old Oak should be protected, especially in the medium term while other options are being developed.
3. Details need to be brought forward in consultation with interested parties on how firms and other activities (e.g. cultural activities, artists and makers) adversely affected by the development will be supported and compensated.

Alternative Policy Option (1) could be associated with a slower and smaller scale overall development option, especially in the shorter term. One option set out in the DIFS is that major developments begin in 2026 to maximise CiL income and facilitate maximum affordable housing (p 162). Encouraging a wider spread of B1(a) to (c) uses (e.g. around Willesden Junction and Hythe Road station) could encourage early appeal of the area to a wider range of businesses, facilitate existing business clusters (including cultural and artistic uses) and locally dependent firms, and support a scale and density of development across the OPDC area more in tune with surrounding areas, and more able to meet a wider social and employment need in the short, medium and longer terms. It would also avoid having to predict in a risky fashion what kinds of employment uses will evolve over the 20-30 year period of the development/plan.

Alternative Policy Option (2) is not supported. This would run counter to supporting existing sectors and businesses (8.12)

**Alterations suggested**: Add in to 8.16: “Light industrial uses, **mixed business** **uses, and artistic, cultural and making activities** can make use of spaces etc..”

E3: Park Royal

1. Concerns are raised about the potential for intensification in Park Royal in the absence of better roads and public transport, as car parking takes up a lot of space and roads are already heavily used.
2. The residents in Park Royal need to be taken into account in detailed plans for intensification and regeneration. Existing uses should be sustained and enhanced, including health, hospital and retail. Any further loss of hospital capacity should be stopped. The Park Royal neighbourhood centre proposal is supported.
3. One suggestion is to relocate the existing recycling plants in Old Oak to Park Royal.
4. Evidence: The hybridity of the economic activities in Park Royal, revealed in the *Park Royal Atlas,* does not seem to be capture by the strong references to “manufacturing” uses. More use could also be made here of the London Office Policy Review (2012) which reveals the complex range of uses in Industrial/Office spaces across London, including the important role that Industrial land plays in providing low cost business space in general. More detail could be provided in the evidence based documents (Industrial Land Review) on the loss of industrial land across the 3 boroughs, through unimplemented planning permissions for example, which would strengthen the case for protecting SiL.
5. A more nuanced approach to land uses in Park Royal could be used to ensure that businesses located close to residents are more closely and effectively regulated. Some areas could be more mixed use. The areas between Wesley Estate, and adjacent to Old Oak Lane could be considered for these more “soft” industrial uses. Retail and services (including nurseries, eating places) should be spread through Park Royal and not only concentrated in the centre to facilitate access by employees and nearby residents.
6. More could be made about the potential spinoffs from existing and new academic centres in the area, including Central Middlesex Hospital e.g. advanced manufacturing, medical research, robotics.
7. The accommodation of displaced Old Oak businesses in suitably located areas should be a priority for any early developments in Park Royal.

Alternative Policy Option 2. While the need for industrial land to be protected is clear, as point (c) above argues, this land use across London is very diverse in hosting varied business activities including logistics, warehousing, and commercial. The return of HS2 land to SIL could be accommodated with this alternative policy if soft and mixed industrial uses and intensification and regeneration initiatives were concentrated here and in other areas abutting residential use. The potential for more mixed uses across Park Royal has been raised in discussions amongst residents. While the strategic value of industrial land is recognised, allocating more areas to more mixed uses (not residential, but perhaps some home-work/co-working opportunities) could accommodate some of the displaced uses from Old Oak. We note that the way people work is changing, and more diverse uses need to be accommodated.

E4: Open Workspace: This is a set of policies which are positively received, with it being noted that West London is much less well provided than East and South London in this regard. Evidence on whether these might be in demand in West London should be collected (vs fashionable East London). A range of scruffy and cheap buildings should be preserved in Park Royal to enable affordable and diverse uses consistent with open work space policies; policies of active management of regeneration should be tempered by this goal. The policy to protect existing workspaces meeting the criteria for Open Workspaces is welcomed. This should explicitly be stated to apply to artists, cultural workers and makers.

Small businesses find security in owning their own business properties. Any developments need to ensure there is scope for property ownership within the diverse offer of business premises.

E5: Local Access to Employment and training

1. The investment in socio-economic regeneration staff, and the range of good ideas expressed is noted.
2. The attention to the areas of high deprivation around OPDC area, the high rates of unemployment especially amongst core working age populations compared to the London average (Socio-economic baseline study, p. 31), and the benefits of work (8.50) is also noted. It is suggested that protecting existing local jobs, already suited to the skills profile of the population, should be an additional priority of the OPDC.
3. Targets of local people in employment, and in apprenticeships and training should be set.
4. Such targets may not be met (anecdotal evidence suggests some low take up at the moment) unless specific action is taken - what initiatives will be taken to ensure there is take up? Efforts need to be made now in local schools and colleges to develop aspiration, interest and relevant education in time for the development – the timescale for this should be reflected in 8.54 and in the work plans of the socio-economic regeneration team. Work experience for scholars could begin now. An onsite technical college would encourage apprenticeships in the OPDC area. Not a lot of detail on how this will happen. Will the jobs be good for local people at good wages with long term possibilities for progression or will they only be focussed in construction, retail and hospitality, for example? The idea of compacts between local schools and firms could enable a wide range of jobs to be provided.
5. 8.52 proposes that close home-work relationships are valuable. No data has been presented on the existing relationship between home and workplace location for the OPDC area and region. The anecdotal evidence from residents and businesses suggests a close interaction, with low home to work travel times. Strategic support for employment of local people, and support to sustain existing employment opportunities should be strengthened to ensure this situation of sustainable travel and work is. The most effective way to support local employment could therefore be to promote and sustain existing work and workplaces. This should be included as an option in the plan.

**Alterations suggested**:

1. Targets need to be set for local employment, training and apprenticeships (perhaps 30-50% of all posts, training opportunities etc).
2. Additional Preferred Policy Option: “c) Existing and emerging successful businesses, especially those with close links to Park Royal businesses and to neighbouring areas, will be supported. A charter will be drawn up in agreement with existing local businesses to cover the eventualities of relocation, displacement, CPOs or undue developer pressure.
3. Additional Preferred Policy Option: d) An onsite technical/training college will be sought early in the development process to directly support local training.

**TOWN CENTRE USES**

TC1: Strategic policy for town centre uses: The assessment of the need for town centre uses in the Old Oak and Park Royal areas is broadly supported. We feel that the immediate and meantime needs of existing populations and centres needs to be brought forward to be reflected in the overall strategy here. In addition, the mix of leisure and cultural facilities needs to meet the needs of the existing, surrounding and future populations, in being affordable (and including free activities), meeting the leisure needs of all ages and sectors of the population.

**Alterations suggested:**

Rephrase preferred policy option (a): we propose this reads: *-* ***serves existing and new residential communities and also attract visitors*** *–* rather than *‘help to strengthen London’s position as the world’s cultural capital’.* This wider ambition seems unrealistic and should not undermine meeting the more immediate needs of residents.

Given the emphasis on the new Old Oak town centre filling a gap in cultural and leisure facilities in this region of London, shouldn’t (b) also include class D uses?

*(c)*propose adding in… *which complement and support “****existing nearby centres as well as****” London’s wider network of centres*

Additional strategic policies should include:

(g) support the retention of existing shops and services

(h) conserve, enhance and memorialise the significance of the heritage of the area, including the distinctive ethnic offer of retail in the OPDC area.

(i) encourage development that supports walkable networks within the OPDC area. This would have implications for the spatial distribution/configuration of the retail offer of “Old Oak High Street” as a major centre.

As further justification text we propose the following:

9.10 The OPDC will focus on developing human scale, healthy neighbourhoods within and around the OPDC boundary. There are existing centres that can be regenerated and serve existing and new residential areas by planning based on walkable distances. The focus of the development should not be conceptualised around the Old Oak Common station but around community hearts linked by pedestrian and cycling networks and high quality streets and spaces.

Add to 9.7: The OPDC will support retail and leisure developments which provide a balanced offer across the network of centres in the OPDC area and region, and seek to ensure a significant proportion of the leisure and retail provision is affordable and/or free, meeting the needs of all ages and sectors of the population.

TC2: Town Centre Hierarchy: The provision of a major town centre focussed on Old Oak High Street is broadly supported (so Alternative Policy Option 1 is not supported for the reasons given in the Retail and Leisure Needs Study), but we suggest there are other alternatives and issues to consider in the distribution of retail which Policy Alternatives 2 and 3 do not explore fully or adequately capture. These also relate to the impact on surrounding regional centres, including Harlesden and Ealing. Policy alternative 3 would be closer to the suggestions below, but we suggest that the possibility of delivering a Major Centre should still be explored, but in a different configuration, perhaps with different concentrations instead of a single linear offering. A neighbourhood centre to the north of Old Oak (near Willesden Junction) may be more appropriate to balancing the concerns regarding Harlesden. However, a more active approach to Harlesden is also seen as a potential policy direction. We applaud the approach to consider the OPDC area/region as an integrated whole, and encourage strong attention to the concerns expressed in the RLNS concerning the likely impacts of the OPDC development.

Point 9.14 is in contradiction with the RLNS concern about the negative impact of the OO High Street on Harlesden, and also with point 9.43.

In our view, the key issues to consider here in taking this part of the Local Plan forward are:

1. Immediate needs for residents should be assessed – the retail and leisure needs study does not look at current retail and leisure patterns and offers. For example, currently access to neighbourhood and local centres is currently very poor – access to Harlesden is severely constrained from e.g. North/East Acton, for example, and provision in North/East Acton is currently very limited. A neighbourhood centre around Atlas Road/Victoria Road is proposed to demonstrate the potential for development in the area in the very early stages of the development. It would connect existing communities, Wesley Estate, The Island Triangle, Wells House Road, and Shaftesbury Gardens and would be on the commuter strip from Willesden Junction to North Acton, being an attractive area for retail.
2. Park Royal retail uses could be more distributed through the area to enable better access by employees and residents. This should include services such as nurseries and eating places.
3. The concentration of retail along one long strip between two commuter stations does not seem well suited to the wider place-making ambitions of the Local Plan and seems rather geared at commuter footfall. A different configuration of main street uses, with some stronger concentrations, perhaps distinctive side streets or squares, associated with green and open spaces and leisure uses, and some distribution of small local centres through the area to ensure access to local residents should rather be encouraged. This would also enable Old Oak to offer a more distinctive destination/s to a wider London population. It is not clear that the Old Oak Common train station should also be the focus of retail in the area.
4. We note the intention for OPDC to work with neighbouring Local authorities on the impact on local, neighbourhood and regional centres. We suggest this affects most immediately Brent and Harlesden, and requires specific plans to be put in place to monitor impacts and determine planning applications (9.43). We propose that local community groups/neighbourhood forums in the area be closely involved in taking these plans forward.
5. The following ideas have been put forward in relation to Harlesden:

* Concern was expressed at the GUA meeting on 16th March that larger stores on the High Street should be focused at the South end – to assist in providing some protection to Harlesden as a locally based Town Centre with a range of shops that meet the needs of ethnically diverse communities. Insofar as the retail offer was to be very different, this effect might be lessened.
* The potential should be taken to promote the distinctive ethnic offer of Harlseden, as a unique destination. This is already the case, especially for African and African-Caribbean communities – people travel from far and wide across London to benefit from this centre. This might also be the case for the emerging Latin businesses in the area. The example of Brick Lane/Banglatown came to mind.
* Some comments from residents:

“Harlesden is a key area and is supplies ethnic food. It is absolutely critical to retain the businesses there, otherwise it would be a great loss for the community.”

“I would like to have an iconic status in Harlesden, for it become like Brick Lane

It is quite important that the document says that there will be an impact on the businesses in Harlesden. People are not aware of that. *There are no shops or green spaces or anything for people in North Acton to use.”*

* The impact on rents and size of premises should be closely monitored and where possible planning tools be used to protect and support existing high street firms through the transition, with many small (including micro and sub-divided) shops and independent businesses. Survey research indicates very low awareness of the coming impact of OPDC on local businesses. Many businesses are closely linked into different communities in the area and are often central to livelihoods. Their loss and displacement could have a significant impact on levels of employment and potentially on deprivation. We note the co-existence, for example, of Westfield with surrounding local shopping streets, but also that this has not supported or enhanced these surrounding businesses in any way and seems to have prevented growth and improvement.
* 9.43: Given the many smaller businesses in Harlesden, should a lower threshold be set for reviewing impact? In relation to this point, we note a contradiction between TC4 – Policy (a) **iii**. Demonstrate through robust justification and evidence that the proposals would not adversely affect the vitality and viability of nearby centres where proposals would exceed the quantitative need; and **iv.** Submit a ‘Town Centre Enhancement Strategy’ where proposals are likely to have an impact on nearby centre.

TC5: Culture, sports and leisure facilities: The lack of cultural offers in other town centres in West London is identified as a USP. It is noted that QPR are still lobbying for a stadium – which residents do not support and which we note would intensify housing development elsewhere on the site. The suggestion a cultural strategy will be developed and that larger developments should provide justification in terms of how they would contribute to a cultural strategy is supported. It is suggested that community representatives should take the lead in developing a cultural strategy.

**Alterations suggested**

Alter policy section (d) to ‘provide accessible and inclusive access for local communities in terms of age, ability/disability and income’. The highly commercialised leisure and retail option envisaged through phrases such as “global leader of culture” or “London as the world’s cultural capital” as well as the suggestion that appropriate facilities will be delivered by working with developers does not seem likely to meet the expectation of free and very cheap access to leisure. Public provision options need to be explored and this should be a priority for CiL funding.

Please note below (in section on Social Infrastructure) a proposal for an additional policy relating to the needs of children and young people.

TC7: Evening night time economy

Alternative policy option 1 is not supported as this will disrupt planned residential uses.

**SOCIAL INFRASTRUCTURE**

It is felt that a new policy SI6 needs to be added to meet the specific needs of children and young people. There is concern that young people are being forced to move out from shared spaces that have been privatised. There should be provisions of amenities and common open spaces for children and young people to hang out and play in, for free - not at commercial rates, in order to be inclusive. The size of the spaces is important as it has to be big enough for young people to play sport such as football. Training facilities are also important. OPDC should involve children and young people at an early stage to understand their needs are and ensure that these are being addressed at a policy level.

SI1, Strategic Policy for social Infrastructure: There is strong concern that there is an ongoing loss of infrastructure around the OPDC area and that this will have a knock on impact on new development. It is not clear that this has been considered in an evidence based way. If would be good if the OPDC could stipulate how this is being monitored and the way in which it is co-operating with the boroughs to both address existing need and ensure maximum benefit from new infrastructure. At a meeting held on 16th March community representatives reported 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 can’t 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.
* There is not enough data for us to see how the relationship between the OPDC area and surrounding areas will work in this respect. More work must be done on this.
* While the DIFS is very much focused on growth of population it is going to be very difficult to address cross borough boundary issues.

There is also a lack of infrastructure to support the needs of the existing communities within the OPDC area so it is inconceivable that there will be social infrastructure in the OPDC area that is no-longer needed – so the last five words of **(a)** should be removed.

Given the current lack of social infrastructure in the OPDC area, it is proposed that additionally, text be added to section **(b)** - highlighted in bold as follows – ‘secure enhancements to existing and provide new social infrastructure to support the needs of the new and **existing population** living in the OPDC area **– in an attempt to promote cohesive communities, foster diversity, interaction and social capital**.

There is concern that there is not going to be enough funding for the social infrastructure required and that this could impact on the amount of affordable housing that might be provided.

It is felt that both the required levels of social infrastructure and affordable housing needed must be secured.

With regard to ongoing maintenance costs of social infrastructure - section **(f)** this must be secured not just considered.

SI2: Education: Community representatives are worried that there is no room for expansion of the existing schools. Policy section (**b)** should be changed to acknowledge this and identify other ways of addressing short/medium term needs.

There is strong support for the development of both further and higher education in the OPDC area, which community members suggest should also be linked to training and employment opportunities for young people. It is suggested that section (**d)** be altered to add ‘further’ and higher education institutions in the OPDC area and that the following point should also be added ‘**Encourage development of further education facilities to support apprenticeship schemes relevant to Park Royal industries.** There is need to raise the aspirations of young people in the area, which might best be done by linking jobs to education and training and vice versa.

Sufficient must be developed to accommodate both existing and new need.

SI3: Health: As already highlighted in response to SI1, there is much concern that existing health facilities are closing down or have capacity problems. This is not addressed in this policy or policy text.

It is suggested that policy (**b)** needs to be altered as follows - ‘Require proposals to provide adequate health provision (**in co-operation with the three OPDC boroughs**) to meet the needs of development **and of existing communities.**

It is proposed that health supervision should also be linked to the employment section and be included in terms of meeting new jobs targets.

SI4: Community Facilities: Given that there is already a lack of community facilities for the existing community in the OPDC area, it is suggested that (a) should have ‘**and existing population’** added.

It is proposed that the following additions are added to support community aspirations:

* (f) Create publicly accessible public building supporting cultural, recreational and physical activity needs; such as skate parks.
* g) Promote a sense of community ownership; supporting engaged and empowered communities.
* (h) are multi-use as far as possible.

S15: Pubs: Since there are only 3 pubs within the OPDC area it is proposed that these must be protected full stop.

**TRANSPORT**

T1: Strategic policy for transport: 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.

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. The policy (**b)** requirement of embedding and integrating transport infrastructure should recognise the need to do this in a sensitive and appropriate way. This should be stated in policy.

Rather than focus on the usual themes or modes of transport, it may be more helpful to plan around ‘categories of users’ and how the OPDC will seek, through policy, to meet (or challenge) their perceived transport needs. For example, it is clear that there will be differing requirements arising from one of Old Oak’s functions as a major transport interchange compared with its local neighbourhood provision. 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.

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 T1. Furthermore, this policy and an associated programme of transport schemes, should prioritise the resolution of existing transport problems within Park Royal and Old Oak.

Although the transport user hierarchy and the strategic objective of modal shift are outlined in text para11.5, this is not expressed in the policy. They should be. Both are key components of a sustainable approach to transport/spatial planning and deserve to be recognised as crucial steers to the plan. A further elaboration of this user hierarchy should assign priority to pedestrians by the provision of well-connected walkable, lifetime neighbourhoods. This should lead to the integrate of both existing and new communities within the OPDC together with those in the neighbouring areas by sustainable methods of transport.

An important part of the evidence to support this Plan and this policy is The Walking, Cycling, Streets and Public Realm Strategy which has not been published yet. This is essential to redress the balance of published transport evidence which is weighted towards motorised movements in the Transport Studies.

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 forward.

T2: Walking: 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.

Furthermore, the planning concept from the London Plan of lifetime neighbourhoods should be applied to facilitate walkable areas and neighbourhoods. The same principles should be applied to the business areas to enable and promote journeys/trips on foot to local services, homes or stations. Connectivity with neighbouring districts is particularly important.

Some detailed comments are as follows:

* 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. The overwhelming preference is for segregated cycling and pedestrian facilities.
* Footpaths should be wide enough, and kept clear of obstructions – parked vehicles etc. -. Park Royal with its narrow streets is difficult to walk.
* Policy **(d)** should be strengthened by encouraging the creation of greened/treed routes and a green walking surface as well as hard surfaces.
* Policy should 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.
* To link to the policy T1b) it is suggested that expenditure on Legible London signage should leak out of the strict OPDC area, and appear on neighbouring streets.

An important part of the evidence to support this Plan and this policy is The Walking, Cycling, Streets and Public Realm document which has not been published yet. There is a need for continuing dialogue to share and consider the diverse suggestions for specific projects.

T3 Cycling: 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.

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 very limited cycle network connectivity beyond the boundary of the MDC and few links across the boundary.

Policy **(b)** should require the segregation of cyclists and pedestrians – as comments to Policy T2 Walking.

An important part of the evidence to support this Plan and this policy is The Walking, Cycling, Streets and Public Realm document which has not been published yet. Need for continuing dialogue to share and consider the diverse suggestions for specific projects to take these forward.

Local knowledge suggests that there is a redundant freight railway tunnel under the A40, just west of the parallel Central Line tunnel that could be made into a cycling route. Another suggestion is to turn the existing unused bridge over the Central Line (West Ruislip branch) into a tunnel for a cycling net. These and other alterative options should be further explored by the OPDC actively engaging and involving the community in the design of the cycling routes.

As it is already suggested elsewhere, there should be no entrance to the Scrubs directly from Hs2. The alternative suggestion, regarding a new north-south route into Wormwood Scrubs, further east than the HS2 station entrances should allow cycling as well as walking.

T4: Rail: 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. 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.

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 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.

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.

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 T4. And the accompanying map.

There is need for continuing dialogue to share and consider the diverse suggestions for specific projects to take these forward.

T5: Buses: 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.

The provision of frequency increases, new and extended bus routes and bus stop locations warrants Involvement of the community in their planning. Whilst the electronic version of this Local Plan document is understood to include a possible bus route map, this 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.

Policies **(c)** and **(e)** should include that bus stops are fit for purpose for all users, regardless age or ability.

There is a need for continuing dialogue to share and consider the diverse suggestions for specific projects to take these forward.

T6: Roads and Streets: 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 the policy.

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.

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.

T7: Car Parking: 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.

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 (see T8 response).

T8: Freight, servicing and deliveries: The policy requires proposals to identify potential sites for consolidation centre(s) and lorry holding areas. However, text para 11.67, and Policy P9 Old Oak West, identifies a specific site, because it may become available. To avoid pre-empting the selection of sites, there should be transparent objective site selection criteria to ensure the proper planning of the area. 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.

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.

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 Policy P5 Park Royal, should bring forward a management programme to resolve prevailing traffic, servicing and environmental issues.

T9: Construction: This policy should explicitly state: development required to demonstrate how it implements the OPDC/TfL Construction Logistics Strategy – to give better effect to strategic coordination of trips etc. and the supporting text para 11.75. Policy T8’s text para 11.67 and Policy P9 Old Oak West identify a site for construction consolidation. As with the comments made for T8 above, site selection should have transparent objective planning criteria. The headlines of which are best set out in T9 policy. Then the policy would then be complete, with all significant components relating to the transport planning for Construction.

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 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.

Process: There should be meaningful and effective community involvement in the preparation of the OPDC/TfL’s Construction Logistics Strategy. The community and its involvement must be part of the development Construction Logistics Plan and Construction Code of Practice. Appropriate method of construction, including related transport, agreements should be part of the planning approval process.

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; developments should follow Considerate Contractor Schemes; these should include good communication with the community to help minimise inconvenience; prefabricated building components should be promoted. 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, including highways/foot & cycle paths in the vicinity.

T10: Transport assessments and Travel Plans: Policy b) requires CLPs and DSPs to be in line with the London Freight Plan. This is presently out of date (2007). Pending it replacement, the OPDC should put forward the factors and criteria that should be used to inform these plans. This is important for these plans are requirements of Policies T8 & T9 and relate to key components of the development of Old Oak and Park Royal

**ENVIRONMENT AND UTILITTIES**

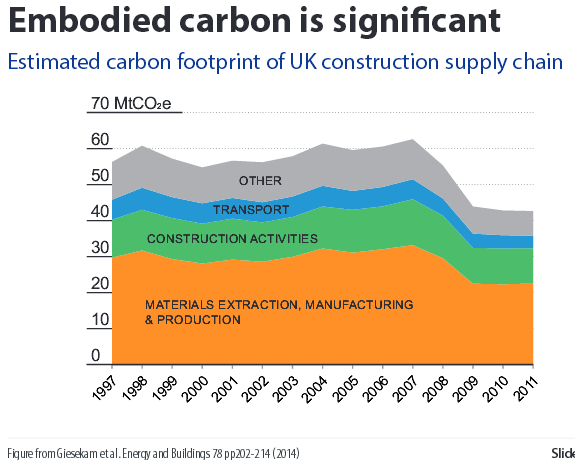
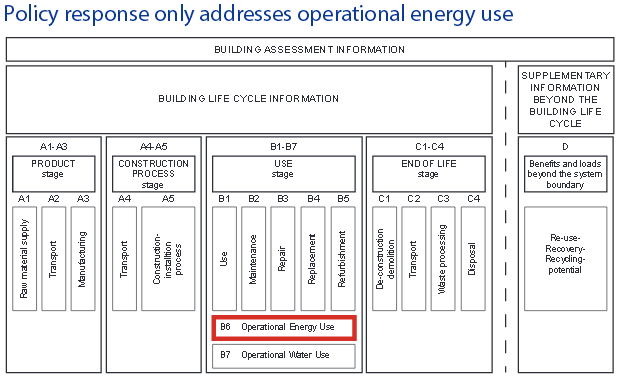
EU1: Strategic policy for the environment and Utilities: The policy needs to give greater directional steer for creating exemplary developments

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. Consequently, there are two connected policy directions that should be explicitly expressed here and taken up throughout other environmental and relevant policies: that the Local Plan needs to and will secure the implementation of the best possible practical means available at the time to create exemplary developments in terms of environmental sustainability; and that development and the area should be future proofed to meet the challenge of climate change, flood risk, built and natural environments under pressure, environmental degradation and resource competition

A separate section or policy is needed to deal with all issues during the very protracted construction phase – to include embodied carbon emissions, extraction of minerals, air pollution, noise and vibration,

The policy should have greater referencing to ‘embodied carbon’, including appearing in Table 13 and as 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 2020 benchmark of 2ero carbon homes and plan for homes that are carbon sinks.

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.



EU2: Smart technology: The policy has too narrow view of benefits of open data.

Smart technology has the potential to liberate and democratise support, service and control systems through open technology and data for all. However, this policy and text expresses this in terms of utility for the OPDC. This is a particularly narrow and unambitious view which should be corrected by a rewrite. Proposing an MDC ‘dashboard’ would be positive. Note that the OPDC should learn from Dublin City Corporation which is faced with a ‘paywall’ to access certain data through the commercial contracts it has entered into.

EU3: Water: “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). This context and the existing and planned situations make a sustainable exemplary approach essential.

Policy (**a**) has uncertain planning consequences. The Integrated Water Management Study IWMS) arranges measures into 6 options; the recommended one would recycle waste water on a strategic scale at ground or above ground level. The strategic facilities are said to be needed outside of the core development area. So the planning consequences, in terms of land take, visual impact, neighbourliness, displacement etc. are unstated. This is a policy lacking clarity, coupled with uncertain delivery. The concern is there will be an expectation that open spaces, including Wormwood Scrubs, would need to be the site(s). 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.

Policy (**e**) is not practical/effective. 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). This part of the Local Plan has not been positively prepared.

Policy **(f**) & **(g)** fails to adequately alleviate flood risk and poor water quality

Policy relies on development proposals to support/include actions/measures alleviating flood risk and poor water quality, but large tracts, particularly Park Royal, would not be within such proposals, exposing homes, livelihoods and critical infrastructure to risk.

EU4: Waste management: 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.

Policy **(b**) & (**c**) rather than resolves, generates wider environmental issues. Relocation of other waste sites within the MDC area would be problematical particularly in the light of the adverse environmental impacts described in the Waste Strategy (paras 3.26 & 3.29). Along with the safeguarding of existing Powerday waste site, the Waste Strategy promotes a tripling of the current level of throughput and for it to become Old Oak’s construction material reprocessing centre and to meet LB Hammersmith & Fulham’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. Underpinning the energy from waste at EU4 para 12.41 is a fundamental misunderstanding of the Circular Economy concept. Furthermore, EU4 policy is too narrowly based failing to drive waste management up the hierarchy and to contribute to the sustainable and efficient use of resources. It does not achieve sustainable development.

Additional detailed comments Fully integrate environmental infrastructure (including facilities for minimisation of waste and the maximisation of recycling) within housing developments. Food recycling from homes and businesses should be encouraged for which there should be a locally appropriate anaerobic digester.

Encourage standardisation and co-ordination of procedures around waste and recycling to prevent confusion and duplication especially where developments cross borough boundaries.

Energy from Waste (EfW) Incineration 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.

EU5: Circular economy and resource efficiency (with reference to EU4 Waste management): The Policy needs to apply to all development and operation stages. It is too narrowly focused and does not express important elements of the accompanying text. For example, a) only references building materials and does not address the operation of development as opposed to building/development. Policy should require that planning proposals should demonstrate adoption of Waste Hierarchy and Circular Economy principles in construction and operation stages and how occupiers/activities will minimise waste and maximise reuse, recycling and composting.

The policy understates the potentials of Circular Economy and misapplies concept to support energy from waste. Circular Economy not only facilities more sustainable ways of managing waste and improves resource efficiency, which are highlighted in EU5, 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 the proposal for energy from waste advanced in EU8 para12.51 and EU4 waste Management policy to which this comment also applies.

EU6: Decentralised energy: The policy has too limited scope; it should be broadened to include renewables/low carbon energy criteria

The policy framework has further evolved with the launch of the London Energy Plan whose low demand scenario enables London to meet its carbon reduction targets, but requires widespread retrofitting and energy demand suppression/reduction. EU6 policy focuses only on enabling demand to be satisfied through a decentralised energy network. This is too limited a policy. National guidance also advises on the usefulness of renewable and low carbon energy policies based on clear criteria (PPG5-007). Renewable and related technologies such as battery storage or Solar PV should be addressed.

Policy (**c)i** is critically important to get correct It is important to stress the need to provide safeguards for customers who face lock in to one provider. Costs could be negative to households in fuel poverty.

There are uncertainties around the Decentralised Energy Strategy and Energy Centre. Information on the feasibility and implementation is lacking. The size of an Energy Centre is likely to be large and its location is unknown. Analysis of the size and potential levels of nuisance and disturbance from the Centre have to be provided.

Additional detailed comments: Efficient, value for money decentralised energy network/CCHP/CHP needs an optimum number of users to be linked in. All the blocks at N Acton use electricity, not gas for heating – this is a missed opportunity.

Even if the OPDC secures high levels of insulation that will reduce need for heating, hot water supply for washing, showers and baths will be a considerable load to be factored in. Since overheating (as a result of the heat island effect) is increasingly a problem in the summer, cooling systems (CCHP) may need to be prioritised.

Efficient use of CHP/CCHP requires 24hr mixed-use load demands via a mixed use development site. Hospitals and hotels, as good candidates, should be prioritised.

There would be a need for wayleave agreement when it comes to some getting linked into the heat and power network (E.g. Wells House Road and Midland Terrace).

EU7: Digital communications: Issues section accurately sets out the prevailing lamentable inadequacy of digital communications in Old Oak and Park Royal. However, policy should clearly explain that exemplary digital communications infrastructure should serve not only new development but also existing areas.

EU8: Green infrastructure & biodiversity (with reference to P4 Grand Union Canal): 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 & PPG8-004).

Policy (**a**) should protect and enhance and relate to existing spaces There is a need to clarify and confirm that policy refers to existing spaces for national policy requires both protection and enhancement – not “or” – as well as creation and management (NPPF114).

The canal warrants particular biodiversity policy focus. The canal is important for biodiversity, as well as amenity etc., reasons and warrants particular attention in EU8 policy as P4 Grand Union Canal policy does not really address this issue and opportunity. The following comments also apply to P4 policy. Development adjacent to the canal should ensure that it is not only accessible to everyone, but functions as a thriving continuous wildlife corridor: having an appropriate height./relationship to the canal; and where possible, bridges over the canal that are light and foot/cycle only. 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.

Additional detailed comments: Policy and 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.

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.

Trees – protection, planting, including species to use to address heat island effect, CO2 emissions and pollution. The greening of areas unlikely to be redeveloped in the near future, particularly Park Royal. Urban food growing should be promoted and facilitated. Light pollution, heat island effect, and development sustainability should be tackled.

EU9: Extraction of minerals (with reference to T8 Freight etc.) 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. Note that Policy T8 Freight etc. does not explicitly articulate the supporting text para 11.65.

EU10: Air Quality: 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. But the OPDC policy language of “regard to”, “considers”, “aim to”, “seek to” is not sufficiently emphatic given the adverse health impact risks. There is now a need to share delivery of the Supreme Court judgement 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.

OPDC Local Air Quality Action Plan needed to augment Air Quality Study (AQS)

The AQS has a range of measures and policy requirements, but does not identify such environmental mitigations as listed below. Poor air quality is such a serious issue that the OPDC should have its own local air quality action plan to ensure optimum alignment with the Local Plan and the OPDC’s potentials to control development not only through planning policy.

Add the following to AQS/local action plan:

Rigorously and extensively monitor (with the boroughs) locations and sites contributing to poor air quality. In response to monitoring, mitigate any detrimental impact of existing and any increased levels of air pollution.

Promote and proactively use interventions including ‘filter stations’, the planting of trees, shrubs etc., ‘living walls’ that effectively absorb pollutants.

Actively promote and require the use of sustainable forms of transport, including by canal for the transportation of building materials.

EU11: Noise: Policy title: Add ‘**and Vibration’**. Vibration is often associated with noise and also adversely impacts on health and quality of life.

The policy is inadequate – it omits improving the acoustic environment and protecting (relative) tranquillity areas.

The policy fails to elaborate on considering opportunities to improve the acoustic environment (see PPG 30-001) - this is only mentioned in supporting text. – and the protection of areas of (relative) tranquillity which exist in Wormwood Scrubs and the canal, for example. There should be scope for communities to identify such areas (London Plan Policy 7.15 text).

The policy is inadequate – it omits minimising noise impacts, including construction, on neighbours. The policy leaves out explicit requirement to minimise adverse noise impacts from development on neighbours – during site clearance through construction to full operation (NPPF 123). 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.

EU12: Land contamination: Incorporate Precautionary Principle and take Strategic Approach

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 EU12(a). 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).

**5. Delivery and Implementation**

This section does not fully disclose the issues concerning funding needs raised in the DIFS. The figure of £2bn is not justified (cf the £1.5bn in the DIFS) For example, on p. 180 of the DIFS the authors comment: "Assuming that Old Oak development was supporting these gross costs (which in itself would not be particularly fair, given that gross costs include national infrastructure unrelated to Old Oak development) then by 2025 .... the funding deficit would be over £800m."

In fact in the calculations for affordable housing the funding gap at 40% is £544m, almost identical to the national infrastructure (p. 189). We note then that the percentage of affordable housing is very sensitive to the assumption that national infrastructure should be provided from the OPDC developable land.

In this regard such major developments should be provided by public bodies and providers who will ultimately recoup their expenditure and benefit from their operation and taxation. Thus it seems that items T2, T8, T9, T10, T11, T16 at least should not be included in the allocation of infrastructure charges to CiL or other sources of OPDC funding. These costs and the vast risks of borrowing (as TiFs) or allocating business revenues to cover these ultimately and inappropriately fall on local boroughs and residents who are deprived of relevant sources of income to cover needs for a generation, and risk not being able to afford services or undertake developments in the future. Borrowing should be placed only against assets and ascribed to the responsible body e.g. if borrowing is to cover a train station or line, the risk should fall on TfL or National Rail, as appropriate, and not on OPDC or its successor bodies (London Boroughs).

T18 is controversial in terms of preserving the character and use of Wormwood Scrubs, and the need for such access needs to be stringently reviewed.

Concerns have been expressed regarding the large number of road junction road junction improvements listed in table 16.

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Representatives of resident and community groups and individuals (listed below) engaged in GUA events (listed in the introduction of this response) from which contributions have been drawn together into this collaborative response:

Acton Alliance; Art West; Brent Mencap; Canal and River Trust; Chelsea Close Residents Association; City Mission Church; Diocese of London Strategic Development Team; Ealing Passenger Transport User Group; Friends of Kensal Green Cemetery; Friends of the Wormwood Scrubs; Hanger Hill Garden Estate Resident Association; HEART; Hammersmith and Fulham Urban Studies Centre; Hammersmith Society; Hammersmith and Fulham Historic Buildings Group; Harlesden All Souls Church; Harlesden Methodist Church; Harlesden Town Team; Harrow Road Business Alliance;Just Space,Lift People (Brent); London Gypsy and Traveller Unit; New Glory International Ministries; Pioneer Way Tenants Association; Regents Network; Save Ealing's Centre; Sobus, St Martin’s Church; St Quintin and Woodlands Neighbourhood Forum and Residents Association; Stonebridge Somali Centre; The Island Triangle Residents Association; Wells House Road Residents Association; Wesley Estate Residents Association; West Acton Residents’ Association; West London Line Group; West Twyford Residents Association and individual residents from Old Oak Estate (H&F); Midland Terrace and Shaftsbury Gardens (within the OPDC area) and various parts of Harlesden.

Comments were also received (by email) and have been included in this response from Hammersmith and Fulham Disability Forum Planning Group.

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