OPDC
OLD OAK AND
PARK ROYAL
DEVELOPMENT
CORPORATION

Appendix 2: OPDC LPA draft new London Plan consultation response

15th October 2026

Dear Nina,

Thank you for consulting the Mayor of London's Old Oak and Park Royal Development Corporation (OPDC) Planning Directorate on the draft new London Plan (2026). We welcome the new London Plan and continued recognition of the importance of Old Oak and Park Royal as Brownfield First Opportunity Area which can play a key role in driving west London's growth. We have some focussed comments on behalf of OPDC as a local planning authority which are set out below. We understand our Delivery Directorate will be submitting separate representations to yourselves.

If you have any points of clarification we'd be happy to discuss these. You can contact me via email at tom.cardis@opdc.london.gov.uk

Yours sincerely,



Tom Cardis
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Old Oak and Park Royal Development Corporation (OPDC)

Chapter	Reference	Comment
Throughout	Throughout	The majority of plan-making policies refer to “plan-making authorities”, which is welcomed from an MDC perspective as it better reflects the range of bodies with plan-making responsibilities in London. However, some policies instead refer to “Boroughs” or “Local Planning Authorities/LPAs”, including MBUL5, MBUL7, HN4 and HN5. Unless these references are intentionally limited to boroughs or LPAs, the terminology should be standardised to avoid ambiguity. Related to this, the Plan should clarify whether its plan-making policies are intended to apply to neighbourhood plans. This would help neighbourhood forums understand where London Plan policy expectations are relevant to neighbourhood planning, including in preparing positively framed, pro-growth policies. To support this, the Plan should include, or signpost to, a clear definition of “plan-making authorities”. Consideration should also be given to whether the Plan should distinguish between “plan-making authorities” and “plan-makers”, reflecting the distinction made in footnote 5 of the draft NPPF in relation to neighbourhood forums. This would help differentiate between LPAs and neighbourhood forums. Proposed changes: • Standardise terminology by referring to “plan-making authorities” unless a policy requirement is expressly intended to apply only to boroughs or LPAs. • Clarify the status of neighbourhood plans in relation to the Plan’s plan-making policies. • Define, or signpost to definitions of, “plan-making authorities” and “plan-makers”, and consider whether the distinction used in footnote 5 of the draft NPPF should be reflected in the London Plan.
1. Overview of the Plan and	Chapter-wide	OPDC supports the continued use of Good Growth as the organising principle for the London Plan, particularly the objectives to make the best use of land, deliver homes and

Good Growth objectives		neighbourhoods, grow London's economy inclusively, and create a greener, healthier and more resilient city. Good Growth is a central component in OPDC's own Local Plan and will continue to shape our next Local Plan. OPDC particularly welcomes the Plan's emphasis on optimising brownfield land, building out Brownfield First Opportunity Areas, aligning growth with transport and infrastructure investment, and recognising the role of public sector intervention, land assembly and partnership approaches in unlocking delivery. These matters are central to the successful regeneration of Old Oak and enhancement of Park Royal.
2. Making the best use of land and achieving good growth	Reasoned justification for chapter 2	To further demonstrate the extent of the Mayor's planning tools to deliver growth and optimise development, consideration should be given to referring to the existing and any future potential Mayoral Development Corporations. Proposed change: Refer to Mayoral Development Corporations as tools to drive growth and optimise development.
2. Making the best use of land and achieving good growth	MBUL1 / Figures 2.1 and 2.2	OPDC welcomes the continued identification of the OPDC area as the Old Oak / Park Royal Brownfield First Opportunity Area and supports its continued location within two growth corridors. OPDC welcomes the recognition that new housing, employment development and infrastructure investment should be located, phased, coordinated and designed together. This is particularly important in balancing housing growth at Old Oak with the strategic industrial and employment role of Park Royal.
2. Making the best use of land and achieving good growth	MBUL2	OPDC supports the objective of optimising brownfield land and providing greater clarity on appropriate density, height and site capacity, particularly where this supports delivery in well-connected locations. MBUL2 seeks to make the best use of land, make the most of brownfield opportunities and link optimisation to sustainable transport connectivity. OPDC also welcomes the recognition that design codes, masterplans and site allocations guide site optimisation. This is important for large scale areas of change, such as Old Oak and Park Royal, where development capacity needs to be shaped through a coordinated plan-led approach. OPDC supports the use of the Optimisation Framework as a strategic tool to avoid underuse of land, while noting the policy's recognition that site-specific context,

		constraints, sensitivity to change, transport connectivity and viability should inform the appropriate design response. However, clarity should be provided to whether the existing Characterisation and Growth Strategy LPG and the Optimising Site Capacity: A Design-led Approach LPG continue to apply to plan-making authorities in undertaking their assessments required in MBUL2(A).
2. Making the best use of land and achieving good growth	MBUL2	Policy MBUL2(A)(1) and Box MUL2(a) require plan-making authorities to plan for growth and ensure site optimisation by using design codes, masterplans and site allocations 'prepared by LPAs'. However, this limits the ability for LPAs to: • Use design codes and masterplans prepared in partnership with private sector partners as evidence base for Local Plans; and/or • Use design codes or masterplans prepared by development arms of public sector organisations that have been formally endorsed as evidence base for Local Plans. Additionally, there is a discrepancy between the design tools listed in MULB2(A)(1) and Box MBUL2(a). Proposed change: Amend MBUL2(A)(1) and Box MUL2(a) to enable LPAs to use design tools prepared with/by other organisations subject to appropriate assessment and endorsement of materials by the LPA.
2. Making the best use of land and achieving good growth	MBUL2	OPDC notes the reference in part A to existing and planned levels of sustainable transport connectivity in relation to planning for growth. However, the current available Sustainable Access Measure (SAM) tool appears to relate to current access levels and doesn't reflect planned transport infrastructure. This results in the Optimisation Framework not being able to fully optimise development of sites and may result in anti-growth stakeholders using the Framework to argue for lower levels of development. This will be a key consideration for the OPDC area in relation to the Old Oak Common Station. If this is not the case, further information should be included in the plan defining the assumptions used to inform the SAM tool. Proposed changes: Amend Box MBUL2 to refer to likely updates to the SAM resulting in updates to minimum densities and height ranges for areas of change. Clarify assumptions used to inform the SAM tool.
2. Making the best use of land and achieving good growth	MBUL2	OPDC notes in the description for Figure 2.4 that the SAM tool is a measure of different travel times to jobs, services and amenities by public transport and walking. Cycling appears to not have been included within the SAM Tool but other policies, such as MBUL5, talk about Boroughs identifying transport interventions that improve cycling as part of

		improving transport interventions to increase London's overall housing and economic potential. It is unclear how cycling is being factored into SAM and the role that improved cycling infrastructure plays in increasing connectivity in London. Proposed change: Amend the text accompanying Figure 2.4 to set out how cycling will be factored into SAM or what alternative measures are being put in place to account for cycling in contributing to improved connectivity.
2. Making the best use of land and achieving good growth	MBUL2	It is not clear whether existing Local Plan locations and policies for building heights that are over 30m and have been developed using a design-led approach would supersede the height ranges in the Optimisation Framework. Proposed change: Provide information in the implementation section that clarifies how existing policies for building heights should be considered in interim periods prior to new Local Plans being adopted that accord with the new London Plan.
2. Making the best use of land and achieving good growth	MBUL2	There are errors in the setting areas identified in the London Context Map for the OPDC area. In some instances, this results in lower densities and heights identified in the Optimisation Framework than what's planned or has been delivered. Proposed change: Ideally LPAs would be able to notify the GLA which 'setting locations' need to be updated. If that's not achievable, wording recognising that the London Context Map can be updated by LPAs through their own Local Plan character evidence base and reflected in the London Context Map.
2. Making the best use of land and achieving good growth	MBUL2	The London Small Sites Design Code will be a useful tool in both plan-making and decision making. Alongside the Design Code, the London Plan may want to consider including wording which acknowledges the ability for small sites to deliver tall buildings in areas of growth and where it's appropriate regarding the local context. Proposed change: include wording acknowledging that small sites in appropriate locations may have the opportunity to deliver tall buildings subject to them being evidenced in the development of Local Plans.
2. Making the best use of land and achieving good growth	MBUL3	OPDC supports the principle of a plan-led approach to tall buildings, including the requirement for local planning authorities to identify appropriate locations, define boundaries and set appropriate or maximum heights through Local Plans. However, clarity should be provided to whether the existing Characterisation and Growth Strategy LPG continues to apply to plan-making authorities in undertaking their assessments required in MBUL3(A).

2. Making the best use of land and achieving good growth	MBUL3	OPDC welcomes the policy's recognition that tall buildings should be located in areas identified for significant growth or change, with very good sustainable transport connectivity, appropriate townscape capacity and limited sensitivity to impacts. OPDC welcomes the recognition that buildings of 100m and above should be focused in identified metropolitan tall building clusters. OPDC supports the identification of North Acton, Acton Wells and the area around Old Oak Common Station as a Major Metropolitan Cluster for metropolitan tall buildings. However, the description set out in table 2.2 does not reflect the tall building location in OPDC's Local Plan that is designated for the Place of Channel Gate. Tall buildings in Channel Gate are identified to be predominantly in the range of 20 to 30 storeys. The evidence base also relies on the Old Oak West SPD (which provides guidance for area now known as Old Oak). However, for building heights, this repeats Local Plan policies and is only for a portion of the OPDC area. Our Local Plan place policies set out building heights for tall buildings outside of Old Oak West and these are all below 30 storeys. OPDC notes that the tall building heights for Channel Gate and areas outside of Old Oak West would fall below the threshold for being considered metropolitan tall buildings; however to support the optimisation of sites, it would be useful to refer to the whole Old Oak / Park Royal Opportunity Area in table 2.2 and then OPDC can define the appropriate locations for tall buildings as part of its Local Plan review. Proposed change: consider amending table 2.2 as: 5. Old Oak / Park Royal This location refers to the Old Oak / Park Royal Brownfield First Opportunity Area
2. Making the best use of land and achieving good growth	MBUL3	The OPDC area has large expanses of SIL which include large scale industrial typologies which exceed the 30m threshold for a tall building. These include recently developed logistics hubs and data centres. However, policy MBUL3 and Box MBUL3A do not provide sufficient guidance to inform plan-making for these uses/typologies or manage development proposals for them. MBUL(B)(3) provisions for tall buildings outside of tall building areas would also not be suitable given the requirement for SAM 4 of above.

		Change proposed: Consideration should be given to how MBUL3 and Box MBUL3A are utilised for large scale industrial uses located in industrial areas. A critical component to consider is Box MBUL3A 1(ii) regarding sustainable transport connectivity as this is less relevant for these industrial uses which generate low levels of employment.
2. Making the best use of land and achieving good growth	MBUL4	OPDC supports the policy's emphasis on utilities capacity, connectivity and resilience as essential infrastructure for enabling Good Growth. This is particularly important in major regeneration areas, such as the OPDC area, where housing, employment and infrastructure delivery need to be coordinated from the outset.
2. Making the best use of land and achieving good growth	MBUL5	OPDC supports the policy's emphasis on sustainable transport as a key enabler of London's growth, including the need to improve safe, reliable and convenient access by public transport, walking, cycling and wheeling, manage road traffic, safeguard future transport infrastructure and ensure transport interventions are planned in Local Plans and site allocations. Policy MBUL5(B)(1) requires Local Plans to identify within site allocations necessary developer contributions (both financial and physical) to enable the transport interventions identified in Part A. This is likely to align with draft NPPF footnote 7 which requires allocations to identify any site-specific expectations and requirements, including for on-and off-site Infrastructure. However, restricting identifying developer contributions to individual site allocations will not reflect area-wide transport interventions and will likely result in duplication across site allocations. It may be more appropriate for this information to sit within policies. This would align with draft NPPF policy PM2(1)(d).
2. Making the best use of land and achieving good growth	MBUL5	The current London Plan makes reference to specific transport related supporting plans, accreditation and TfL guidance that developers need to adhere to, such as Transport Assessments, Travel Plans, Delivery and Servicing Plans, Construction Logistics Plans, FORS, CLOCS etc. The draft London Plan does not make reference to these. Clarification is needed about whether it is now expected that Local Plans will take on making reference to this guidance.
2. Making the best use of land	MBUL6	OPDC supports the policy's emphasis on high-quality design as essential to managing growth and change, including the need for design codes and guidance, climate resilience, coherent streets and blocks, active frontages, high-quality materials, inclusive and

and achieving good growth		comfortable public realm, and measures to manage wind, daylight, sunlight, overheating, noise and air quality impacts. However, consideration should be given to enabling areas of large scale change with limited positive context or character to deliver high quality place-shaping architecture rather than solely respond to local distinctiveness. This would better reflect draft NPPF policy DP3(1)(a) which talks to architectural innovation and change.
2. Making the best use of land and achieving good growth	MBUL9	OPDC supports the emphasis on public realm quality, including gender-informed design, biodiversity enhancement, climate adaptation, accessibility, safety, social value, and positive health outcomes. The focus on creating public spaces that feel safe and welcoming throughout the day and night, together with the requirement for early engagement with local communities, aligns closely with the principles set out in the OPDC Public Realm and Green Infrastructure SPD.
2. Making the best use of land and achieving good growth	MBUL9	OPDC supports the retention of the Healthy Streets Approach, and the increased focus on the public realm function of streets.
2. Making the best use of land and achieving good growth	MBUL10	OPDC supports the policy's emphasis on designing buildings and places for security, safety and resilience, including early engagement with relevant safety, policing, counter-terrorism and fire safety bodies, proportionate security measures and the need to address the safety of women, girls and vulnerable groups through well-integrated design. OPDC also supports the focus on high standards of fire safety for major residential development and other relevant sleeping accommodation, including the need for appropriate professional fire safety input at planning stage.
3. Delivering the homes and neighbourhoods Londoners need	Introduction text	OPDC supports the chapter's recognition of London's urgent need to deliver more homes, including affordable homes and a wider range of housing types and tenures to meet diverse needs. OPDC also supports the emphasis on good quality, well-designed homes in the right locations and the recognition that affordable housing, Build to Rent, specialist housing and other forms of diversified supply can help support both housing need and delivery rates.
3. Delivering the homes and neighbourhoods Londoners need	HN1 Increasing London's housing stock	OPDC welcomes the 10-year housing target and will ensure our next Local Plan adopts and plans for this. It may be appropriate for OPDC to take a stepped approach to our housing target that takes account of the fact that the expected annual housing delivery will be less in the earlier years and increase over time while ensuring that over the 10 years the overall target is planned for and delivered. We also support the requirement for Local

		Plans to plan positively for delivering long-term capacities. Consideration could also be given to highlighting the potential for, and benefits of, public sector intervention to support housing delivery. Change proposed: Reference could also be given to highlighting the potential for, and benefits of, public sector intervention to support housing delivery.
3. Delivering the homes and neighbourhoods Londoners need	HN3 Delivering affordable housing A (3), B (C) Table 3.2	OPDC includes land within Brent, Ealing (both Location band B) and Hammersmith and Fulham (Location band A). This will make applying the affordable housing location band thresholds more complicated than it would be for a London borough without internal boundaries variation within London borough LPAs. Based on viability evidence gathered for OPDC's Local Plan and CIL Charging Schedule there is little local variation in residential sales values between private land within the Brent, Ealing or Hammersmith and Fulham parts of the OPDC area. There are also high existing use values across the OPDC area. Therefore, a 25% threshold across all OPDC would likely be more appropriate and deliverable, particularly given the need to maximise the delivery of low-cost rent homes. Proposed change: Apply a 25% threshold across the entire OPDC area.
3. Delivering the homes and neighbourhoods Londoners need	HN3 Delivering affordable housing D (1)	The high need for low-cost rent homes is noted and OPDC has sought to maximise the delivery of these homes through its current Local Plan. The existing London Plan Policy H6 A (3) permits the LPA to determine 40% of the affordable housing based on local evidence. This enabled OPDC to demonstrate through viability evidence that it could work towards the Mayor's 50% affordable housing target and has helped to maximise the overall amount of affordable housing. Under the draft new London Plan policy there is no flexibility on the proportion of social rent tenure based on local viability evidence unless a scheme is delivering 75% affordable housing. This is likely to mean that when OPDC conducts its own viability evidence, it will be less likely to demonstrate that strategic mayoral affordable targets can be met. Proposed change: Allow LPAs to vary the tenures where it can be demonstrated that there are locally specific viability factors precluding the attainment of strategic mayoral affordable housing targets.
3. Delivering the homes and neighbourhoods	HN5 Managing specialist accommodation	Support the overall approach of bringing together different strands of non-self-contained housing, supported and specialist housing for older people. OPDC supports the fact that Policy A (2) recognises that there may be circumstances where spatial concentrations of

Londoners need		PBSA exist compared to conventional housing and that LPAs may need to develop policy approaches to ensure more mixed and inclusive neighbourhoods.
3. Delivering the homes and neighbourhoods Londoners need	HN6 Build to Rent	The policy requirement for Key Worker Living homes as part of the affordable housing mix on Build to Rent schemes is supported. The current London Plan supporting text 4.11.10 permits LPAs to require a proportion of affordable housing as low-cost rent where this is justified and where they are managed by a Registered Provider. Given the established need for low-cost rent homes in the draft Plan and evidence base it would be helpful to clarify whether this discretion will still apply.
3. Delivering the homes and neighbourhoods Londoners need	HN8 Housing design	OPDC supports the policy's emphasis on high-quality residential design, including dual aspect homes, location of family homes, natural light, ventilation, privacy, overheating mitigation, tenure-blind design, active frontages, welcoming communal spaces, children's playspace, private and communal amenity spaces. OPDC also supports the emphasis on the long-term maintenance and servicing of the building, including the replacement of external components to simplify the maintenance process and reduce future service charges for residents.
3. Delivering the homes and neighbourhoods Londoners need	HN9 Accessible housing	OPDC supports the overall approach and need for accessible housing across the whole range of residential development. It will be relatively easy to ensure accessible affordable units are occupied by the people who need them through a council's housing allocation scheme. However, it is noted that actively marketing private accessible units to disabled people first, for at least four months prior to completion and at least two months post-completion might be difficult to achieve.
4. Growing London's economy in a way that benefits all	Figure 4.1: Economy sub key diagram	There are several errors with the key – numbers 14-21 are missing. Old Oak/Park Royal is mapped incorrectly on this diagram in the location of Earl's Court and West Kensington.
4. Growing London's economy in a way that benefits all	GLE1 Sufficient and appropriate employment space	OPDC supports the need to meet a diverse range of needs including types, sizes and price points. GLE1A refers to land but should instead focus on floorspace and capacity. These terms are better aligned to Good Growth optimisation objective. GLE1A could be rephrased to clarify and reflect this as follows: A Plan-making authorities should set out policies in local plans to meet the diverse <u>needs</u> and floorspace requirements for all economic uses by providing for a range of suitable business space of different types, sizes and price-points having regard

		to the needs of SMEs, larger firms and third sector organisations, and informed by the London Growth Plan and London-wide and local assessments of supply and demand OPDC welcomes the reference to the need for planning conditions to restrict changes of use where justified and necessary including the reasons set out in the policy. It would be beneficial to refer to the agent of change in the supporting text as well so that there is consistent reference to this term where relevant in this chapter.
4. Growing London's economy in a way that benefits all	GLE2 Supply of industrial land	OPDC notes the PMA level benchmarks and that an indicative breakdown is provided by borough in the Economic Uses Supply and Demand Study. The OPDC area is a key area for planned growth and needs to balance demand from a range of land uses within our limited boundary. OPDC look forward to working with the GLA as part of PMA level discussions and to ensure the unique role of MDCs are taken into account as part of these discussions. It's not clear how GLE2H would operate in practice. For example, if there was an intensified form of Eg(ii) or Eg(iii) outside of SIL and LSIS, such as in a town centre, would this type of proposal need to demonstrate that this would free up industrial capacity to help meet identified strategic needs elsewhere? And how might it do this?
4. Growing London's economy in a way that benefits all	GLE3 Data Centres	We note that data centres are a key growth trend in London and welcome strategic consideration of this issue in the draft London Plan and the associated evidence base. There is a concentration of data centres in the OPDC area. Through our experience of assessing these types of planning application, some of the core issues beyond land use include: • Design (such as height, massing, townscape and heritage impacts, layout, public realm and architectural quality) • Environment (such as energy efficiency, heat recovery, air quality, flood risk, drainage, waste, contaminated land, BREEAM, climate change, ecology and biodiversity) • Amenity (such as daylight/sunlight, noise and vibration) and transport impacts • Economic (such as job creation, employment, training and affordable workspace opportunities)

		The data centres in the OPDC area are a different stages - pre-existing, newly completed, under construction and permitted. The GLA evidence base report refers to the availability of industrial land in the OPDC area, but there are low levels of vacancy. As mentioned under GLE2, the OPDC area has also to balance demands, including from industrial sectors that are highly significant to the local and London economy, and is faced with significant land constraints given our limited boundary. OPDC is mindful that the strategic forces shaping the data centre landscape are UK wide, rather than locally focussed. As such, we would welcome further consideration and discussions on how the GLA can support the strategic coordination of this sector across London. Our comments on the current proposed wording are as follows: The locational criteria under GLEA should consider the following (additions underlined): GLE3A2 – the potential negative impact of clustering should also be recognised here i.e. 'Opportunities for clustering to support resilience and co-location benefits**,** <u>and considering other potential cumulative impacts'</u>**.** GLE3A4 considers the 'availability of land without compromising the supply to meet…employment and infrastructure needs that depend on freight transport infrastructure'. This should be expanded to ensure data centre locations would not compromise supply to meet other strategic objectives identified such as the West Tech Corridor. GLE3B – this sets out the steps to follow if no suitable locations are found within plan areas. The GLA could play a proactive role in supporting this policy by leading on strategic collaboration with regions outside of London. The policy should be developed further so that development proposals are steered towards other areas of best practice, beyond those listed for back up power in part G. OPDC note the recognition that ongoing monitoring of the scale and cumulative impacts of multiple date centre developments is required within suitable locations and the ability to keep re-assessing them based on the criteria set out in Part A. Part D should recognise

		that suitable locations will be subject to ongoing monitoring and re-assessment using criteria A and therefore regard should be had to that as part of the DM process. OPDC note the point made in para 4.40 that, outside of suitable locations, proposals should demonstrate a need and suitability for the specific location. The assessment and approach to mitigation should consider how they perform against the criteria set out in part A, and any other material considerations. OPDC supports reference to plan making authorities setting out opportunities for data centres to contribute to relevant local benefits. Some of these benefits can also help to mitigate the potential harm that could be caused by these often large and tall buildings, such as creating active frontages by co-locating it with affordable or small business space. Given the potential for change in this sector, the reference to electricity network or connections in GLE3 A1 and E2 should be expanded to/replaced by power network, so this can include electricity and gas.
4. Growing London's economy in a way that benefits all	GLE4 Night-time economy	OPDC welcome the opportunity to plan for growth in the night-time economy, including support for the in principle protection and reprovision of pubs. As such, local evidence base should be able to revisit the Night Time Economy (NTE) category identified for OPDC in Annex B. This is particularly important given that Old Oak is an emerging town centre and is at an early stage of development. Alternatively, the draft London Plan should identify Old Oak Major Town Centre as being a NT2 or NT3 classification. The centre is expecting to provide almost 100,000sqm of town centre uses and potentially include large-scale cultural and catalyst uses and given its transport accessibility, perform a role as a regional centre for the night-time economy.
4. Growing London's economy in a way that benefits all	GLE5 Culture and creative industries	OPDC support in principle of protecting and managing new and existing cultural production and creative workspaces. Part E could be clarified as follows: E The use of vacant properties and land for pop-ups or meanwhile uses for cultural and creative activities during the day and at night-time should be supported. This may also be appropriate in industrial areas, where the safety of visitors is addressed and if it can be ensured that industrial activities, including any 24-hour operations, and the integrity and effectiveness of industrial locations ~~industrial activities including any 24-hour operations~~ are not compromised.

4. Growing London's economy in a way that benefits all	GLE7 Affordable workspace	OPDC welcomes references to the potential the onsite or offsite delivery of affordable workspace. Allowing a greater level of flexibility aligns with the evidence-based approach set out in OPDC's planning guidance and will enable LPAs to consider what is appropriate on a site-by-site basis. LPAs need to have flexibility and opportunity to prioritise on site provision where appropriate. GLE7D implies that offsite provision and/or financial contribution to a local authority affordable workspace fund should be supported by a local authority affordable workspace strategy. This should be revised to state local planning authority rather than local authority in order that MDCs can develop their own strategy. However, we consider that such as strategy should not be necessary in order to secure off-site provision, as long as the objectives of the affordable workspace fund are clear. The draft Plan states that the policy will apply to: "developments including offices, research and development and/or light industrial uses (Use Class E(g)), data centres and B8 storage or distribution uses". GLE7A confirms this by expecting plan making authorities to include policies to support affordable workspace, triggered by applications that include those use classes, where justified by strategic and local evidence of need and an assessment of viability. The draft London Plan should not restrict the ability for LPAs to seek affordable workspace provision from applications for other land uses not mentioned in GLE7A if local viability evidence supports this. Affordable workspace plays an important role in local economies and meeting needs for locally significant sectors and therefore it's critical that LPAs are able to develop policies that can help meet these needs.
4. Growing London's economy in a way that benefits all	GLE11 Circular Economy	OPDC support reference to all development proposals promoting circular economy outcomes.
4. Growing London's economy in a way that benefits all	GLE12 Waste	OPDC welcome the Plan's ongoing commitment to transitioning towards a more resource-efficient and circular economy. OPDC also support the approach to MDCs set out in para 4.104. OPDC has a strong record of cooperating with Brent (LBB), Ealing (LBE) and Hammersmith and Fulham (LBHF) to help them meet waste needs. This is demonstrated through the 2015 West

		London Waste Plan (WLWP), 2022 OPDC Local Plan and emerging new WLWP. The latter is supported by more up to date evidence for the plan area which shows that there is sufficient capacity to meet waste needs and support the limited plan led release of some existing waste sites, including two sites in the OPDC area. The OPDC Local Plan policies also demonstrate how OPDC is helping the London Borough of Hammersmith and Fulham (LBHF) meet their waste needs. OPDC and LBHF jointly signed a Statement of Common Ground with Royal Borough of Kensington and Chelsea. OPDC will continue to work with LBHF on waste matters as we commence the review of OPDC's Local Plan, including reviewing any joint Statements of Common Ground.
3. Creating a greener, healthier and resilient city	Overall comment	OPDC supports the overall approach of recognising green infrastructure as strategic infrastructure rather than solely an environmental enhancement. We welcome the integration of climate emergency objectives, net zero carbon ambitions, climate resilience, biodiversity recovery and the reduction of health inequalities through a holistic, multi-benefit approach. This reflects the important role that green infrastructure plays in delivering environmental, social and economic outcomes.
	GHR6: Trees, biodiversity and geodiversity	OPDC welcomes the policy's integrated approach to protecting and enhancing trees, biodiversity and geodiversity, and supports its role in embedding nature recovery within both plan-making and development management processes. From a development management perspective, the policy provides a clear framework for assessing the biodiversity and arboricultural impacts of development proposals and securing measurable environmental enhancements. From a plan-making perspective, OPDC supports the stronger alignment between development plans with nature recovery priorities, green infrastructure networks and biodiversity objectives, helping to deliver a more strategic, integrated and coordinated approach to environmental improvement. While OPDC supports the requirement for applicants to demonstrate how proposals contribute to LNRS priorities, further guidance would be beneficial on the level of evidence expected and how compliance should be assessed at the planning application stage. This would help ensure a consistent approach across London authorities.
	GHR7: Green infrastructure	OPDC welcomes the policy's strengthened focus on directing green infrastructure and urban greening to locations where it can deliver the greatest benefits for nature recovery,

	and Urban Greening Factor	climate adaptation, urban cooling and human health, including areas vulnerable to the impacts of overheating. OPDC also supports the introduction of defined Urban Greening Factor targets across residential, commercial and industrial development, which are broadly compatible with the diverse land uses within the OPDC area.
	GHR8: Accessible green space	OPDC welcomes the policy and its focus on improving access to Accessible Green Space (AGS), particularly through prioritising on-site provision within major developments and in areas identified as experiencing deficiencies in access to green space. From a development management perspective, the policy provides a clear basis for assessing how development proposals contribute towards addressing deficiencies in green space provision and improving access to high-quality green infrastructure. From a plan-making perspective, OPDC supports the strategic approach to identifying and addressing AGS deficiencies through the coordinated planning of growth, green infrastructure networks and public open space. Further clarification may be helpful on how accessibility should be assessed, particularly where physical barriers such as rail corridors, major roads or industrial areas affect the practical accessibility of green spaces despite proximity distances being met.
	GHR9: Clean and healthy waterways	OPDC welcomes the policy's focus on protecting, restoring and enhancing London's waterways, recognising their important role in delivering biodiversity, climate resilience, flood risk management, water quality improvements and health and wellbeing benefits. From a development management perspective, the policy provides a clear framework for assessing the impacts of development on waterways and securing enhancements to water quality, river corridors, ecological value and public access where appropriate. From a plan-making perspective, OPDC supports the strategic integration of waterways into growth, place-making, green infrastructure and climate resilience strategies, helping to deliver a more connected and resilient blue-green infrastructure network.
6. Place visions and place-based approaches	Introduction text	OPDC supports the chapter’s place-based approach to supporting development in locations with strategic growth potential. OPDC particularly supports the recognition of Brownfield First Opportunity Areas as key reservoirs of housing and economic potential that will require additional attention, intervention and coordination to bring forward.
6. Place visions and place-based approaches	PV1: Brownfield-first Opportunity Areas	See comments on Annex E: Brownfield First Opportunity Areas strategic growth visions

6. Place visions and place-based approaches	PV2: Central Activities Zone (CAZ)	There may be merit in highlighting the role of Old Oak major town centre as a strategic gateway to the CAZ following the opening of Old Oak Common station, particularly given its function as the principal HS2 interchange for west London and its future role in supporting CAZ-related economic activity.
6. Place visions and place-based approaches	PV3: Town centres and high streets	OPDC supports the identification of Old Oak as a future potential emerging town centre and the reference at para 6.21 that allows for changes to town centre classifications. It is noted that the evidence base has looked at high streets. The High Street Boundaries map should be available on the Data store so that LPAs are able to review these.
6. Place visions and place-based approaches	PV4: Strategic economic clusters and corridors	OPDC welcomes the reference to the West Tech Corridor as a strategic economic corridor. Current and future Local Plan SIL and town centre designations will support its delivery. To help illustrate how designations can work together to support a corridor or cluster, OPDC could be referenced as an example in paragraph 6.31. Part B expects Development Plans to support the growth of wider economic corridors. For example, West Tech Corridor in the case of OPDC. Plans are also expected to help meet strategic benchmarks for storage and distribution uses under GLE2 – see comments under GLE2. A balance will need to be struck between GLE2 and PV4.
6. Place visions and place-based approaches	PV8: Strategic and local views	OPDC's Local Plan sets out a range of different local key views. These were identified and developed using a simpler methodology than those of the LVMF and are functioning well in shaping development in the OPDC area. However, policy PV8(D) advises plan-making authorities to use the principles of LVMF criteria, terminology and assessment methodologies for the designation and management of local views. While this may be appropriate for some locations and to manage impacts on sensitive receptors, we consider this requirement to be overly arduous for all views. Proposed change: amend policy PV8(D) to refer to taking a proportionate approach for designating and managing local views which may involve elements of the LVMF methodology.
Annex B: Town centre network		OPDC support the identification of Old Oak as a future potential emerging town centre and the reference at para 6.21 that allows for changes to town centre classifications. There should also be the opportunity for local evidence base to revisit the Night Time Economy (NTE) category identified for OPDC in Annex B. This is particularly important given that Old Oak is an emerging town centre that is at an early stage of development.

Annex E: Brownfield First Opportunity Areas strategic growth visions	PV1: Brownfield-first Opportunity Areas And Annex E: Brownfield First Opportunity Areas strategic growth visions	OPDC welcomes the continued identification of indicative capacities for new homes and jobs for the Old Oak/Park Royal Brownfield First Opportunity Area (BFOA) set out in Annex E. However, the OA status is identified as 'maturing'. OPDC considers that the status should be changed to 'underway' as per the published pen portrait. OPDC welcomes policy PV1(A) which requires Local Plans to help realise the capacity for strategic scale good growth in BFOAs, taking account of the need to optimise development in line with policy MBUL2 and the indicative capacities for homes and jobs in Annex E. OPDC's next Local Plan will meet the requirements of policy PV1(A) to identify the conditions required to allow development to come forward and address these in site allocations, spatial policies, and prioritised interventions. OPDC's existing Local Plan site allocations and policies already reflects this approach. OPDC welcomes the strategic growth vision in Annex E for the Old Oak/Park Royal; however, to create a stronger linkage to policy PV1(A) it would be useful to confirm in the vision that the BFOA indicative capacities will be considered in the production of OPDC's next Local Plan. Officers would be happy to work with the GLA on the wording. OPDC notes that the 23,000 homes indicative capacity is lower than then 2021 London Plan's capacity of 25,500. This reflects development that has been delivered to date and the expected delivery of new homes over the plan period. OPDC also notes that 19,900 jobs indicative capacity is lower than the 2021 London Plan's capacity of 65,000. The 2021 capacity of 65,000 was assessed through OPDC's 2022 Local Plan which identified a lower capacity of 56,250. Subsequently in summer 2025, a lower capacity of 44,000 was presented to OPDC Board reflecting the Old Oak Masterplan Framework proposals. The further lower 19,900 capacity is due to: • the capacity being based on net jobs whereas previous figure was based on gross jobs • different timeframes being utilised and future development sites phasing being beyond the London Plan period. • changes in projected employment floorspace and, therefore, job delivery as noted in OPDC's Economic Vision

		OPDC is committed to working with stakeholders and partners to optimise the delivery of jobs including by seeking to exceed the job capacities and, where possible, accelerate the delivery of new jobs. Proposed changes: • Amend OA status to ‘underway’ • Include wording reflecting the indicative capacities will be considered in the production of OPDC’s next Local Plan.