

Correspondent 40 (Robin Brown/Grand Union Alliance)

Comment Ref/Representation 24: Specific change to Policy E1

Subject: 'Right to be Heard'

I have studied the various relevant documents and have come to the conclusion on behalf of the Grand Union Alliance that I wish to be heard.

At the outset I would also refer to the accompanying Comment Ref/Representation concerning Policy E2 which also advanced changes to that Policy.

The main reasons for invoking the Right to be Heard are essentially :

That we believe that the Matters arising from the Hearings relevant to the consideration of the Employment Chapter and in particular Policies E1 & E2 have not been adequately addressed by the OPDC in the Modifications to date. Please see an extract from Examination Document ref ID-26 below. This should be the subject of further discussion and examination.

That Policies E1 & E2 have evolved over time without a reasonable degree of justification being in the public domain and subject to examination. Policy E1 originally focused on protecting employment across whole OPDC area and Policy E2 originally focused on supporting new employment floorspace across the OPDC area. The current iterations have E1 just focusing on protecting industrial floorspace capacity in SIL and E2 just supporting new employment uses outside of SIL. On the face of it, this is apparently logical, but in doing so, those merited protections for existing businesses of Policy E2 b) & c) no longer apply as explicit and definite policy to SIL. The proposed changes were an attempt to remedy this.

That insufficient care and attention has been devoted to Policies E1 & E2, indicating that they do not meet the required standards and appropriateness, and that they require revisiting. For example, Policy E1 d) refers onto Transport Policy T8 (Construction) and not to T7 Servicing and Delivering; again, whereas "applicant's Design and Access Statement" has been deleted from Policy 1 e) "to ensure the effectiveness of the Plan", it has been retained for Policy E2 a ii).

And that development and planning responses concerning employment and the vitality and viability of the business employment environment across the OPDC's area have changed over the period of the examination. These have given rise to such observations made by members of the Grand Union Alliance that have informed the Comment ref/representation 27. We draw attention to this as a summary of some of our concerns as part of the background to the proposed changes, whilst appreciating that it is not directly the subject of this 'Right to be Heard' approach.

Finally, we do acknowledge the following:

Our specific changes and amendments to both Policies E1 and E2 geographically referenced Park Royal. Whereas in the light of the Modifications, particularly the retention of Old Oak North as SIL, they should have more appropriately referred to 'industrial areas', or such similar phrase, so as to include Old Oak North. We understand the explanation from the OPDC on the Modification MINOR/2/E1/1 referring to industrial floor space capacity.

Regards, Robin Brown for the Grand Union Alliance  
*Examination Document ref ID-26 Old Oak and Park Royal Development Corporation Local Plan  
Matters arising from Hearing Sessions  
"Day 8 Session 16*

*Andrew Dakers (west London Business) to provide report of survey of firms relocated from Victoria*

*Road by HS2.*

*OPDC to consider matters raised (compatibility of neighbouring uses; specific needs of varying range of businesses; need to be proactive in identifying intensification opportunities; absence of relocation strategy, recognising linkages; identification of minimum degree (plot ratio) for intensification to achieve and of premises/sites not offering potential for further intensification; measures to encourage existing businesses to thrive and grow) and consider whether more can be done".*