

Charlotte Glancy
Programme Officer
OPDC Local Plan
C/O Banks Solutions
80 Lavinia Way
East Preston
West Sussex BN16 1DD

28 October 2021

Dear Sirs

OPDC Local Plan Main Modifications – Right to be Heard

We write in response to the Inspector’s note of 6th October 2021 (ID37), in which the Inspector refers to a number of commentators who have made specific wording suggestions for alterations to the Plan and who, in the spirit of the legislation, have a right to be heard.

We act on behalf of Wards of London Properties (“Correspondent 131”) in respect of the current Waste Recovery Facility at 100 Twyford Abbey Lane (“the Site”) and we do, in response to the Inspector’s note, respectfully insist on our right to appear before the Inspector and be heard; we have requested that a specific change be made to the Plan. We believe that our participation will assist in assessing the soundness of the Plan. We respectfully request and invite the Inspector to hold a hearing session in order that we may be duly heard.

In our representations of 2nd July 2021 (attached) we explained, first, that the OPDC’s Post Submission Modified Draft Local Plan confused the Site with the Twyford Waste Transfer Station (TWTS) which lies to the north of the Site. The key differences between these two sites is that the TWTS is allocated in the West London Waste Plan for waste apportionment purposes, but the Site is not allocated. The two sites therefore have very different development potential. We sought corrections to the Plan. Secondly, we explained why the Site should be removed from its current SIL designation.

We have, in accordance with the Inspector’s request in Note ID37, checked the OPDC’s response to our representations. We see that it is stated on ID37 that our specific correction was accepted by OPDC. However, we respectfully submit that this is unclear:

1. On p618 of OPDC’s response to the representations, where it is pointed out that the Site has been confused with TWTS, the response given alongside that is that “no change” is proposed. With respect, the response does not appear to appreciate the distinction between the allocated and non-allocated sites. Nor is it clear whether the officer has taken on board the report prepared by Arup in relation to compensatory provision.
2. This then contrasts with what is stated on p620 of OPDC’s response, which says that a change is proposed, and that changes will be made to the supporting text of Policy P4. This does not reflect the 3 numbered points clearly set out on p2 of the 2nd July 2021 representations, nor confirmed the change in wording.

London

Central Court, 25 Southampton Buildings
Holborn, WC2A 1AL

Postal and Administration address:

Churchill House, 137-139 Brent St, NW4 4DJ

+44 (0)203 150 1300

www.asserson.co.uk

Further, this only deals with part 1 of our case. OPDC has not accepted the major part of our case which is that the Site should now be removed from the current SIL designation.

With reference to our representations of 2nd July 2021, we consider it to be uncontroversial that the deletion of the 'Cargiant' allocation from the Plan represents a seismic shift in the overall planning strategy for the Opportunity Area. The London Plan 2021 indicative target for the Area remains at 25,500 for the Plan period, but the figure in the latest Draft Plan is now 19,850. We submit it is clear that alternatives sites must be found to make up this significant shortfall, and the Site can assist in closing the gap, for all the reasons set out in our earlier representations.

However, the current SIL designation of the Site, lying as it does directly adjacent to a residential area, unnecessarily constrains its development potential and ability to help close the significant gap which has arisen. We will argue that there is a demonstrably feasible design solution which is appropriate to the location and consistent with policy (as shown in the indicative masterplan prepared by Allies & Morrison, attached) and, importantly, the Site is both suitable and genuinely available for an economically viable, residential-led mixed use scheme. The potential for the Site to be brought forward during the first 5 years of the Plan is achievable. It can be expected to deliver 315+ desperately needed homes for Londoners through sensitive redevelopment.

With respect to the officer's response on p618, the approach appears to rely on the Site not having been previously identified for release from SIL, but misses the reasons why it should in fact be released now. The response largely relies on the fact that as a matter of fact the Site is currently in waste use and repeats that it is needed as such, which again does not engage with the Arup report.

As is clear from the officer responses, they rely, with respect, on substantial repetition of the same or similar wording in response to the majority of our representations. It is unclear why the response states that the development target of 25,500 homes will be met when the Development Capacity Study February 2021 gives an updated figure of 19,850. Both the Industrial Land Review Addendum and Development Capacity Study Update, each dated February 2021, thus substantially pre-date our submissions of July 2021 and the work done to demonstrate the genuine availability and deliverability of the Site in order to assist with closing the housing numbers gap which has been unexpectedly created by the deletion of the Cargiant allocation. The Plan currently does not maximise the delivery of housing in line with London Plan targets and the release of the Site from SIL should be duly considered by the Inspector.

We look forward to confirmation of a hearing date. Please address your response to

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Yours faithfully

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