

19 July 2019

Dear Paul,

On 18<sup>th</sup> July 2019 during OPDC's Draft Local Plan Examination in Public (EiP), Old Oak Park Limited (OOPL), via its legal advisors, made an offer to OPDC that the parties agree to appoint a mediator on a shared costs basis with the objective of such mediation to be to reach agreement on the following matters:

- a) The exact extent of land within Phase 1A to be acquired from Cargiant;
- b) the terms for the acquisition of such land;
- c) appropriate operational mitigation measures to ensure that the delivery of Phase 1A does not prejudice the remainder of Cargiant's business; and
- d) OOPL's position on the "soundness" of the allocation of the remainder of Cargiant's land within the Local Plan in the context of a) -c)

OOPL's offer was conditional upon the Local Plan examination in respect of Site Allocation 2 being suspended for a period of three months to allow the mediation to be undertaken.

OPDC was grateful for OOPL's offer and considered it very seriously. Unfortunately OPDC could not accept OOPL's offer on the basis that it could not countenance the condition that the Local Plan examination in respect of Site Allocation 2 being delayed for three months. Pursuant to s.19 of the Planning and Compulsory Purchase Act 2004, OPDC is under a statutory obligation to bring forward a Local Plan. Furthermore, and in light of significance of the land within OPDC's boundary, OPDC has responsibilities to the Mayor and to Londoners to pursue the timely adoption of its Local Plan, not least so that up-to-date policies are in place to deliver one of the London Plan's (both current and emerging) largest Opportunity Areas and the associated public benefits that would come with this. OPDC is also mindful of Secretary of State's intention that all local planning authorities should have an up-to-date Local Plan in place as soon as possible. The draft Local Plan sets out OPDC's ambitions for its 650 hectare area, and the process in formulating it has included engagement with 11,000 respondents, including OOPL and we therefore cannot justify a three-month suspension to the EiP in order to engage with one party.

Notwithstanding this, it has been OPDC's clear intention, shared publicly and directly with OOPL and its advisors throughout the Local Plan process, that it wishes to engage on the emerging plans for Phase 1A. OPDC would very much like such discussions to include those matters referred to in OOPL's points a) - d). These discussions can and should run concurrently with examination of the Local Plan. OPDC is keen to progress with these discussions as quickly as possible. To demonstrate this and mindful of the requests from the Inspector to reach agreement where possible, OPDC has today written to OOPL with an offer to meet as soon as possible, with a view to reaching agreement on points a) - d).

OPDC is grateful for numerous prompts and encouragement made by the Inspector throughout the hearing for both parties to engage with a view to seeking agreement and

narrowing the issues in dispute. As requested, OPDC will keep the Inspector informed as to the progress of the discussions between itself and OOPL.

We look forward to receiving your further questions following yesterday's hearing in due course and we are happy to respond to any requests for clarification in the interim

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tom Cardis', written over a light grey rectangular background.

Tom Cardis  
Interim Director of Planning  
Old Oak and Park Royal Development Corporation