

Inspector Paul Clark  
c/o Ms Charlotte Glancy  
Banks Solutions,  
80 Lavinia Way,  
East Preston,  
West Sussex,  
BN16 1DD



Date: 22 March 2019

My Ref: 17139

Rep ID: 226

By email

Dear Mr Paul Clark,

**OLD OAK AND PARK ROYAL LOCAL PLAN EXAMINATION – WRITTEN STATEMENT IN RESPONSE TO MATTER 13: WHETHER THE INCLUSION OR EXCLUSION OF LAND FROM SIL IS JUSTIFIED**

ShrimplinBrown Ltd have been instructed by the Royal Borough of Kensington and Chelsea Corporate property team (hereafter referred to as RBKC) to submit the following written statement in response to Matter 13 of the Inspectors Matters and Issues draft as at 28 February 2019.

As set out in the Hearing Session Advice Note, submissions should be made at least four weeks before the relevant hearing session. Matter 13, session 17 is due to take place in Week 3 on Tuesday 16<sup>th</sup> April. Thus, the deadline would have been Tuesday 19<sup>th</sup> March. However, as discussed with Charlotte Glancy on Tuesday 19<sup>th</sup> March, ShrimplinBrown did not receive notification of the Local Plan Examination timetable and we were unaware until earlier this week of the hearing dates. The following statement should be given appropriate consideration with respect to Matter 13.

RBKC wish to draw the Inspectors attention to the unjustified proposed amendment to the boundary of the Park Royal Strategic Industrial Location (SIL) which has been extended to the west of the Neighbourhood Centre to include a parcel of land on Western Road which is owned by RBKC (as shown in Appendix 1). RBKC have submitted a full planning application for the redevelopment of the site to a car pound.

The officers' response to this is set out in Appendix E to Key document 5. This refers to a request from RBKC to remove their site from the SIL. However, this site is not currently in the SIL and forms part of the Neighbourhood Centre designation. Whilst the acknowledgement that they consider a car pound would be an appropriate use for SIL is welcomed, the fact remains that the amendment to change this area from a Neighbourhood Centre to SIL is not justified anywhere in the plan or supporting information.

The change to the SIL designation appears to be a cartographic anomaly, which may be unintentional, however as it stands this aspect of the Submission Local Plan is not justified, nor effective and as such is unsound for the reasons set out below.

Under the existing Neighbourhood Centre designation, the site represents an appropriate transitional use that will provide jobs and represent an active use. This is in line with objective 4 of the 'Heart of Park Royal' of the Old Oak & Park Royal Opportunity Area Planning Framework (OAPF) (Chapter 6, page 104, OPDC, London Plan, adopted November 2015) which suggests that a mix of uses may be an acceptable way of providing a transition from the SIL uses.

The misrepresentation of the site designation has been carried through to the first and second Regulation 19 draft OPDC local plan documents, and now the Submission Local Plan. The submission Proposals Map shows the boundary of the SIL designation amended to include the Western Road site. At no stage during the OPDC Submission Local Plan Consultation has any assessment, reasoning or justification been provided for the inclusion of this site within the SIL, or its specific removal from the existing Neighbourhood Centre designation.

RBKC's position has not changed since the previous written representations made to Regulation 19 (2). The previous comments have not been addressed; no work has been undertaken to justify this change to the SIL boundary and the Corporation has not responded to RBKC's previous representations. The inclusion of this site within the SIL designation is a small but important point that remains overlooked and as such remains an issue.

We do not consider it necessary for us to attend the hearing, but it is important that the Inspector considers and as necessary responds to our comments. We trust that these representations will be given appropriate consideration in the preparation of the Proposed Submission Draft Plan.

Should you wish to discuss the above further then please do not hesitate to contact us.

Yours sincerely

A handwritten signature in black ink, appearing to read 'James Brown', with a stylized, cursive script.

**James Brown**

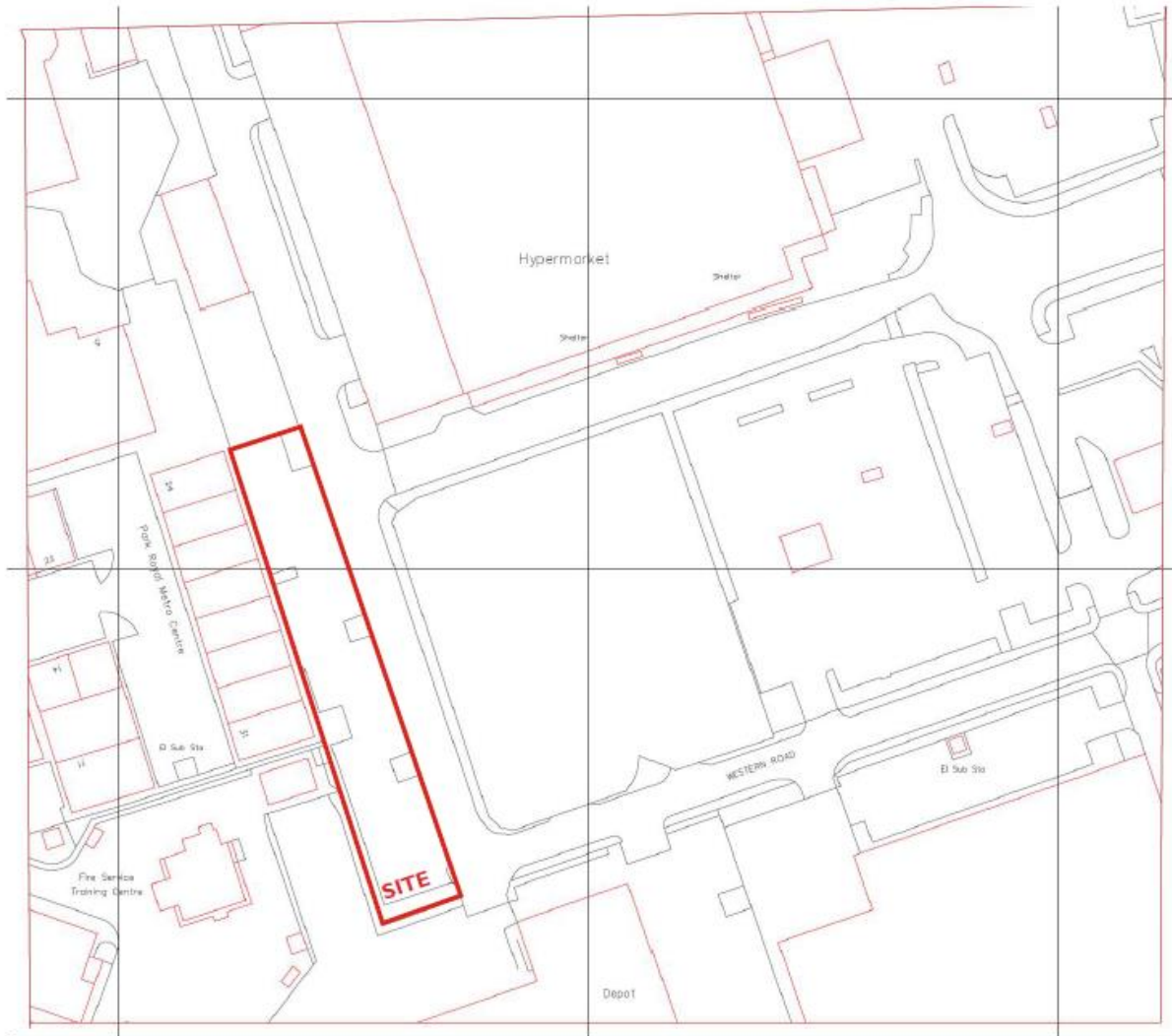
**Director**

James.Brown@shrimplinbrown.com

cc.

encl. Appendix 1

## APPENDIX 1



### LOCATION PLAN

The site is identified as lying within the Neighbourhood Centre in the following adopted documents:

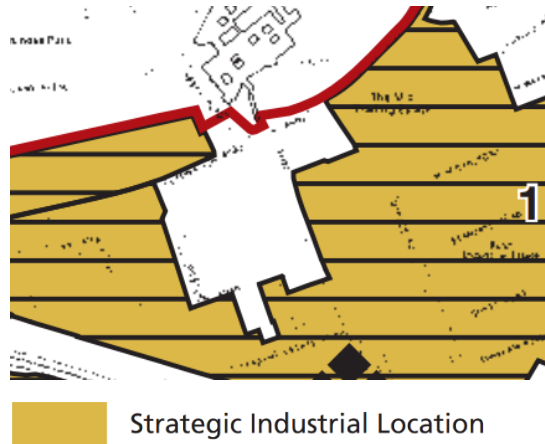
1. Interactive Adopted Proposals Map for the London Borough of Ealing;



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01483 745 414/5, [info@shrimplinbrown.com](mailto:info@shrimplinbrown.com), [www.shrimplinbrown.com](http://www.shrimplinbrown.com)

2. Adopted Proposals Map for the Ealing London Borough Council (December 2013);

- Map sheet 6 (SIL)



- Map sheet 7 (Neighbourhood centre)



3. The Old Oak and Park Royal Opportunity Area Planning Framework (OPDC, London Plan, November 2015);

- a. Figure 71: Park Royal Land Use:



4. Development Strategy 2026 (Ealing London Borough Council DPD, adopted 3<sup>rd</sup> April 2012)

a. Map 13:

Map 13: Mapping the Borough – Acton and Park Royal

