

From: henrypeterson@aol.com,
To: oonforum@gmail.com,
Subject: Fwd: OPDC Planning Committee 17 June - map of development sites
Date: Mon, 20 Jun 2022 14:52

Attachments:

-----Original Message-----

From: Emma Williamson <Emma.Williamson@opdc.london.gov.uk>
To: henrypeterson@aol.com <henrypeterson@aol.com>
CC: Peter Farnham <peter.farnham@opdc.london.gov.uk>; Tom Cardis <tom.cardis@opdc.london.gov.uk>; Claire O'Brien <claire.obrien@opdc.london.gov.uk>; hayescanal@hotmail.co.uk <hayescanal@hotmail.co.uk>; colinedwinged@colinedwinged@gmail.com <colinedwinged@gmail.com>
Sent: Mon, 20 Jun 2022 10:49
Subject: RE: OPDC Planning Committee 17 June - map of development sites

Henry

I have responded to the points raised in your email below each of them in the body of your email below in red.

Emma

Emma Williamson
Director of Planning

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HA9 0FJ

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My pronouns are: she/her



From: henrypeterson@aol.com <henrypeterson@aol.com>

Sent: 17 June 2022 13:47

To: Claire O'Brien <claire.obrien@opdc.london.gov.uk>

Cc: Emma Williamson <Emma.Williamson@opdc.london.gov.uk>; Tom Cardis <tom.cardis@opdc.london.gov.uk>; hayescanal@hotmail.co.uk; colinedwinged@colinedwinged@gmail.com

Subject: OPDC Planning Committee 17 June - map of development sites

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Emma,

At yesterday's Planning Committee meeting you and Claire showed and spoke to the map on the slide below, as part of the discussion on the Local Plan.

If this map is to be used as an adjunct to the Development Management update, to show the geographic location of schemes at pre-app stage, then this is a useful extra. This was how the map was used in the Committee's discussion on the Development Management item. It was less clear why the map below featured in the discussion on the Local Plan recommendations.

This map has generally been included in the committee presentation on the development management update. I used this map yesterday in the discussion on the Local Plan recommendations because I was asked where 5-7 Park Royal Road and Coronation Road were located.

You referred to the continuing correspondence between OONF and yourself over site allocations which we consider are being retro-fitted into the adopted plan, many months after consultation has concluded. These include 5-7 Park Royal Road and Coronation Road, both of which were mentioned in this part of the the committee's discussions.

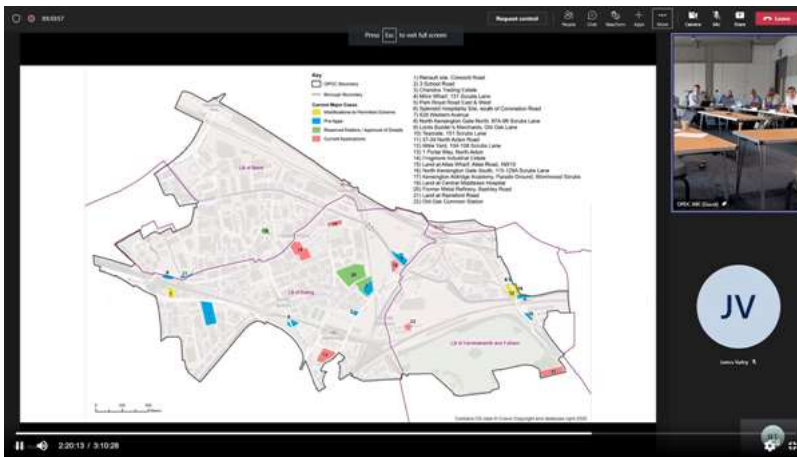
The audio quality of the recordings at Brent Civic Centre is poor, but I think you said that although these two sites did not appear on certain maps used in the 2021 Modifications consultation, they did feature in the set of more local consultation sessions held online? Can you please point to when this happened? I cannot see these sites in e.g. the slides used for the 20 May 2021 session *Summary of changes and introduction to the consultation 26 May 2021*.

That is not correct I said that both sites were included on the maps in the 2021 modifications consultation although I did say that they had not been included in error on a previous version of the tall building statement but this error was corrected before consultation took place. I believe I said that the sites were shown on plans used for the consultation sessions and by that I mean they were in the consultation documents. However on both the first presentation slides and the leaflet we show 5-7 Park Royal Road as a new development site. Coronation Road South wouldn't have been shown as a new site as it formed part of the First Central and Surrounds site allocation which wasn't modified to meet the housing target. This site has always been in the Brewery Cluster.

The FAQ document which was put together following questions asked at the sessions sets out the following on this subject:

Q4t. What's changed from the previous Tall Buildings Statement?

Within the [Tall Buildings Statement Update\(External link\)](#), the definition of a tall building remains the same, at a minimum of 15 storeys or a minimum of 48 metres above ground level. The areas where tall buildings will be appropriate have been updated to reflect the changes in land uses and development sites and better reflect phasing. These include smaller areas in Old Oak South and Old Oak North, an additional two tall buildings on Scrubs Lane. Channel Gate is identified as an appropriate area, alongside 5-7 Park Royal Road and the whole Brewery Cluster in the west of Park Royal is identified as appropriate."



We remain clear that Coronation Road South does *not* feature in updated text in the May 2021 Tall Buildings Statement. Nor was it identified as an appropriate tall buildings location until the 'Futher Modifications' document of September 2021, after the May to July consultation had concluded.

This is simply not true Coronation Road South is not a site allocation in its own right, it forms part of site allocation 5: First Central and Surrounds. It is part of the Brewery Cluster which has always been identified as a tall building location within the text of the Tall Buildings Statement and its Update but in error the site was missed off the tall building location map. Policy P4C1(k) supports tall buildings to be focussed along Coronation Road. This policy was first published in the Regulation 19(1) in June 2017. Refer to answer to the questions above.

We will be writing to give chapter and verse on the sequence of documents, but if your intervention yesterday on these two sites is to feature in the minutes of the Planning Committee discussion, I suggest you await the further response from OONF and Twyford West RA on Coronation Road South before the wording of this part of the minutes is drafted. The Chair asked the committee if members were 'satisfied' by what you said. I am afraid to say we see this part of the meeting as an example of 'retro-fitting' taking place.

The chair asked if members were satisfied that all the issues you raised had been addressed he didn't ask if members were satisfied with my answers.

It is hard for OPDC to argue (as you seemed to yesterday) that there was adequate consultation and discussion on tall building locations and heights during the May-July 2021 consultation on Modifications. The key information contained in OPDC-51 was not made public until late January 2022, as we continue to reiterate.

As responded to you previously the heights now included in the plan which are contained in OPDC-51 are an illustration of the site capacities which have been consulted on previously. As set out in the Inspectors report at paragraph 168: The explicit statement of figures which could be deduced from information already contained within the Plan would not represent a substantive modification to the Plan requiring further consultation and so could be introduced through my discretion to make further non-substantive modifications without additional public consultation. The planning committee report further elucidated on this in para 3.30 as follows: 'this discretion, provided for by paragraph 6.12 of the Planning Inspectorate's Procedural Guidance for Local Plans, which states that main modifications can be introduced by the inspector without the benefit of public consultation "if he or she is satisfied that no party would be prejudiced as a result".'

This new map shows sites that have emerged subsequent to the site allocation maps shown as Figure/PS2/OPDC/PM15 and Figure/PS2/OPDC/3.17 in the May 2021 Table of Figure Modifications. Can you please confirm that this map above will not feature in, and plays no part in, the documentation recommended to Board on June 22nd?

This map provides updates to the status of sites currently being considered through the development management process, it was only used at Planning Committee because I was asked where the Park Royal Road and Coronation Road South sites were. This map will not form part of the Local Plan item presented to Board.

Finally, this map (along with all other layers of the Policy Map in the Local Plan) does not show the boundaries of the Harlesden Neighbourhood Area nor the Old Oak Neighbourhood Area. Is there a reason why these statutory designations are not shown, when there is a Policy Map showing the boundary of conservation areas?

The Old Oak Neighbourhood Forum and the Harlesden Neighbourhood Forum are referred to in paragraph 11.36 supporting policy DI3. Maps of both Neighbourhood Areas are on OPDC's webpages. The Local Plan webpage will provide links to these webpages recognising that the existing Harlesden Neighbourhood Plan and the future Old Oak Neighbourhood Plan form part of OPDC's development plan. The Inspector's Report paragraph 9 confirms the Policies Map and figures in the Local Plan comply with Town and Country Planning (Local Planning)(England) Regulations 2012.

For the development at pre-application stage at Lords Builders Merchants, we do not know whether this site extends into that part of the Old Oak Neighbourhood Area which was added by OPDC in November 2021. If the Lords car park area is involved, the applicants need to know about the neighbourhood forum. Please advise, so that OONF can contact Lords as necessary.

The site does extend into the car park are and the applicant is aware that part of the site is in the neighbourhood forum area.

Best wishes,

Henry Peterson, Adviser to the Old Oak Neighbourhood Forum

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The GLA stands against racism. Black Lives Matter.

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