

OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION – THE CONCERNS OF LOCAL RESIDENTS ON OPDC’S APPROACH TO COMMUNITY ENGAGEMENT

This note has been prepared in response to the discussion on the OPDC at the London Assembly Budget and Performance Committee on 11th June, and to some requests from Assembly Members for views from local residents prior to the Assembly’s Plenary session on July 4th.

Significant information emerged at the 11th June committee session about the current challenges facing the OPDC. Some of this came as news (and disturbing news) to people living in the area. As a result we feel that Assembly members need a fuller picture of the concerns of local people on the direction in which the OPDC has been heading.

Much of this note focuses on how the OPDC has ‘engaged’ with the local community, through formal and less formal consultation processes and other means. We feel that this is a subject on which we can comment with some authority.

Perceptions of individual residents will obviously vary widely. There will be some who feel that OPDC as an organisation communicates and consults effectively. But there have been growing concerns on this score over the past two years amongst those local people who are most closely involved in OPDC activities and decisions.

We recognise that OPDC might describe these residents as ‘the usual suspects’ or NIMBYs, whose views should be set aside in favour of tapping into the opinions of other sections of the population. We also acknowledge that major regeneration proposals have been contested territory at Coin Street, Vauxhall/Nine Elms Battersea, and at Kings Cross. Some of the differences of view between the Corporation and local activists are ones that have arisen in these areas, and at the EIP on the London Plan.

The case of Old Oak, we suggest, is a bit different. There is a consensus across most of the self-organised community groups in the area, including residents associations and two neighbourhood forums, that there have been shortcomings in the approach to consultation and engagement as pursued by the OPDC in the period 2017-19.

Some of these relate to the organisation’s role and status as a Mayoral Development Corporation, sitting within the Mayoral family and tasked with an ambitious agenda of delivery. This is an issue which the Assembly needs to examine. Local people feel that OPDC’s role as statutory planning authority is being distorted as a result of its remit on ‘delivery’.

The concerns are:

- Continued excessive hype in OPDC communications, dating back to the former Mayor’s ‘vision’ of a world-leading example of urban renewal and the ‘transformation’ of a part of London into ‘*one of London’s most exciting areas in which to live, work and play*’. (Boris Johnson foreword to 2015 OAPF).

- A stubborn reluctance by OPDC to take account of consultation responses (from all sources) and to modify 2015 housing and employment targets that were inadequately researched and unrealistic from the start.
- A similar reluctance to accept that 'when the facts change' it is advisable to change one's mind. In its Local Plan preparation, OPDC has largely carried on regardless after discovering the many challenges of the topography of Old Oak and the constraints of rail infrastructure both old and as proposed by HS2.
- Seeming unwillingness to maintain dialogue with Cargiant as a major landowner, or to gain a full understanding of the nature of their business. We could be wrong, but our understanding is that it was OPDC which first chose to end dialogue with Cargiant and to involve lawyers on either side.
- A level of obfuscation if not plain dishonesty with the public, in remaining silent within the Local Plan documentation on some of the key impacts of the Plan's own policies (particularly on proposed housing density levels and resultant building typologies and heights).

For all the above reasons, what had begun as a relatively productive relationship between OPDC and local community organisations in the period April 2015-2016 has subsequently become increasingly adversarial.

Via the Plenary session on July 4th, we think it important that the Assembly gains an understanding of why these local community views have developed. What happens at Old Oak, even if development progresses at a much slower pace than originally conceived, remains a key part of the London Plan in the next Mayoral term.

We try to remain positive and suggest at the end of this note some measures which could improve current relationships.

Most of the concerns set out below were raised directly with OPDC Chair Liz Peace, Planning Committee Chair Will McKee, and (then) interim Chief Executive Officer Mick Mulhern at a meeting in January 2019 with Henry Peterson (adviser to the Old Oak Neighbourhood Forum). They should not come as news to the Corporation.

With limited democratic accountability (as compared with e.g. a London Borough) the Corporation has to date been relatively immune from public comment or criticism. This is mainly because the impact of its actions and decisions, on the ground, has so far been small.

OPDC is now heading towards its fifth year of operation. It is for Assembly members to judge whether outcomes to date have met expectations. External factors, including a slowing London development market, Brexit, and now political uncertainty over HS2, have made life difficult for the Corporation. Yet some of the Corporation's problems are seen by local people as self-inflicted.

Erosion of local public confidence and trust in the Corporation

Prior to the establishment of the OPDC in April 2015, most local community organisations supported the idea of a cross-borough Mayoral Development Corporation. This option was

viewed as more likely to achieve coherent regeneration at Old Oak as compared with joint working by the three Borough Councils.

In the first two years, relationships between the OPDC and local residents were fairly good. As the Corporation's chief executive, Victoria Hills seemed approachable. She was willing to go on local walkabouts with residents, to listen to views of residents, and to acknowledge that developments at North Acton were creating a poor example of urban renewal. She was also honest about the challenges facing the OPDC.

Several factors have changed public perceptions since mid 2017:

- the non-implementation of several recommendations from the Review of the OPDC undertaken by Fiona Fletcher-Smith at the request of the incoming Mayor in May 2016.
- changes to OPDC Board membership in 2017 and 2018
- the rigid stance taken by the Corporation on its Local Plan, and its unwillingness to seek public views on alternative policy options and or to take account of consultation responses.
- the 'refusal' of the 2017 application by the Interim Old Oak Neighbourhood Forum for designation of a 280 hectare neighbourhood area that would have included all the residential communities within and adjoining the OPDC boundary
- the decision not to re-appoint in 2018 the one designated 'Board community member' on the OPDC Board, and the accompanying misinformation on the intended role of Board members as a channel for dialogue with local people.
- the style and approach of OPDC in its publications, consultation events, and 'engagement' activities
- a lack of honesty and transparency on key information within Local Plan documents
- some inadequacies in formal governance and transparency arrangements (codes and protocols, registers of interest and hospitality). Most of these last concerns have now been addressed by OPDC but only after being raised in correspondence with the Chair of the Board.

Further information on each of the above issues is set out below. More detail in terms of correspondence with OPDC, submissions on the Local Plan to the EIP, and letters to OPDC Board members can be provided via the [Old Oak Neighbourhood Forum](mailto:oonforum@gmail.com) (email to oonforum@gmail.com).

1. Non-implementation of several recommendations from the Review of the OPDC undertaken by Fiona Fletcher-Smith at the request of the incoming Mayor in May 2016.

The Fiona Fletcher-Smith Review noted at paragraph 5.6 that *Although there are currently about 1,500 residents in the area, this is set to rise and the development and railway building timetables mean existing residents will be living with the impact of this construction activity – noise, dust and congestion – for a considerable period. The Board only has one, unsupported resident/community representative and some of these residents are difficult to reach*

Recommendation 5.E of the Review read *‘Support for business and community Board members must be provided to enable them to properly represent their constituent groups. Other regular forums outside the Board and Planning Committee should be developed to allow the voice of business and the community to be heard and shape decision making’.*

Despite various conversations about possible forms of such support from OPDC, none has been forthcoming. The position of ‘community Board member’ has ceased to exist.

Such activity can be seen as ‘inclusive’ in that involves a wide range of the public who respond to invitations to events which OPDC badge as ‘community conversations’, ‘community forums’, Christmas ‘Winter Warmer’ parties, tea dances and sessions related to the Arts Council/National Lottery funded ‘Great Places’ scheme. But these events are seen by those local residents most concerned with OPDC decisions and activities as being peripheral to the Corporation’s core planning responsibilities and of limited value in terms of meaningful dialogue and information exchange.

Anecdotal evidence suggests that a number of these events are not well attended by local residents. It is certainly the case that they are infrequently attended by the 100 or so people most involved in the Grand Union Alliance, the Old Oak Neighbourhood Forum, and those residents associations experiencing the greatest impact from OPDC and HS2 decisions.

Recommendation 5.G of the Fletcher-Smith Review was that *The OPDC should adopt innovative practice on community engagement in the preplanning and master planning process, ensuring that decisions, pre-app discussions and advice are as transparent as possible.*

The Corporation has since established its Community Review Group, advertising for and appointing 12 local people to a panel with the role of assessing major planning applications at pre-application stage. This new body sits alongside the Place Review Group (a panel of professionals carrying out pre-application assessments in similar fashion to the external design review bodies operated by many London Boroughs).

The Community Review Group is a welcome step and is indeed innovative. It is a form of community engagement, but one established on the Corporation’s own terms. Although established in mid 2018, the Group has yet to carry out its first pre-application assessment, as there have been no major applications coming forward for OPDC decision over this period. Hence the effectiveness of the Group in influencing decisions has yet to be put to the test.

Despite being recommended at 5.G of the Fiona Fletcher-Smith Review, there has been absolutely no involvement of local people in the OPDC ‘masterplanning process’. Public consultation on the masterplanning work of the AECOM consortium was promised in late 2017, but any such sessions have since been deferred to late summer 2019.

Some of the supporting studies to the OPDC Local Plan contain information derived from masterplanning work. Public consultation on many of these documents has yet to happen, albeit that they have been published online as supporting evidence to the Local Plan. A number of these publications are destined in future to become Supplementary Planning

Documents (SPDs) to the Local Plan. It is unsatisfactory that the Inspector of the Draft Local Plan is being expected to give weight to the content of these supporting studies, when key material within them has never been through a formal public consultation process.

Recent requests for the public to be able to see the product of work by the AECOM consortium and OPDC 'delivery arm' have met with refusal. A FoI/EIR request for sight of the OPDC's 2018 HIF application to MHCLG (redacted as necessary) has been rejected by OPDC. This decision has been challenged and is now being 'internally reviewed' within the GLA. Referral by the Forum to the Information Commissioner may be the next step.

Meanwhile the OPDC continues to claim that its Community Review Group '*will reflect local interests when deciding planning outcomes in the area*' (Annual Report as considered at OPDC Board 30 May). The Group's remit is primarily that of commenting on individual applications, and it is unclear how (at this late stage) it could influence the wider outcomes resulting from Local Plan policies and site allocations.

Several local residents met individually with Fiona Fletcher-Smith at the time of her Review. It is disappointing that her recommendations relating to community involvement and engagement have not been taken forward.

2. Changes to Board membership in 2017 and 2018

After its first meeting chaired by the then Mayor in 2015, Sir Edward Lister took on this role for the remainder of the Mayoral term. Liz Peace CBE was appointed as Board Chair in March 2017.

Described on her appointment as a 'property industry heavyweight' Liz Peace signalled from the start her wish to add development industry expertise to the OPDC Board. Appointments of William Hill (ex Shroders) and Victoria Quinlan (Lendlease) followed.

In the 'refresh' of OPDC Board and Planning Committee membership in autumn 2018, the subsequent OPDC press announcement referred to the appointment by the Mayor of '*diverse and renowned practitioners*' and of '*nine leading industry experts*'. The Board position for a 'business representative' was renewed and its incumbent (Rahul Gokhale) was re-appointed..

The position originally designated in 2015 for a 'community Board member' was not renewed. The Board member who had served in this role from 2015-2018 (Amanda Souter) re-applied but was not re-appointed. This has had an impact on local community organisations and on perceptions of OPDC's commitment to genuine 'engagement' (see below for more background).

The appointment of Liz Peace may have strengthened the influence and perception of the OPDC Board within London's development world, and at MIPIM and similar events. But it has led to the Corporation being seen in a different light by those who live and work in Old Oak.

Local activists are still trying to work out whether the Corporation's efforts at community engagement are weak because they lack real conviction (with OPDC pursuing its Local Plan

policies and delivery targets come what may). Or whether, from the Board Chair downwards, the Corporation as an organisation holds little real knowledge, experience and understanding of what 'good' would look like when it comes to dialogue and engagement with concerned citizens.

Local authorities, the NHS and other parts of the public sector struggle with these same issues. Yet it seems fair to say that many London Boroughs undertake their 'engagement' and consultation activities on planning and development issues with greater effectiveness and success than OPDC.

3. OPDC's rigid adherence to unrealistic housing targets at Old Oak

This issue has been raised at the public hearings of the Examination in Public of the OPDC Draft Local Plan. It will be for Planning Inspector Paul Clark to determine whether the Draft Local Plan meets EU legal requirements on consideration of 'reasonable alternatives' to the Plan's site allocations and its policies on housing density.

What has been clear over the period 2015-18 is that those responsible for the Draft Local Plan have been wholly resistant to consultation responses and representations on this issue, at Regulation 18, 19.1 and 19.2 stage. Proposed housing densities have increased at each iteration of the Draft Plan, culminating in a planned average density of 600 units/hectare in the Old Oak North Development Framework Principles document (a 'supporting study' to the 19.2 Draft Plan as being examined).

This level of density, extended as an *average* to be achieved over a large area, is extreme even for a London Opportunity Area and way beyond the maximum 405 u/ha in the current London Plan Density Matrix for 'central' sites with the highest possible levels of public transport accessibility.

As Assembly Members will know, the realism of these proposals is now being challenged at the EIP by Cargiant/London & Regional Properties. The Inspector is considering rival Counsel's Opinions from QCs on whether the Plan and its Integrated Impact Assessment is sound and justified. A further EIP session on viability of the Local Plan is scheduled for July 18th.

It is unusual for community organisations to find themselves in agreement with major landowners/developers at the Examination of a Local Plan. But on this occasion the Old Oak Neighbourhood Forum shares the view of Cargiant/L&RP that the current Draft Local Plan is fundamentally flawed in its lack of consideration of any alternatives to a 24,000 housing target for Old Oak, first set (with little or no evidence or justification) in the 2015 Further Alterations to the London Plan and since unchanged.

4. The 'refusal' of the original designation application from the Old Oak Neighbourhood Forum for designation of a 280 hectare neighbourhood area

This decision was made by the OPDC Board in September 2017. It followed an OPDC/LBHF public consultation on the proposed boundary of a 280 hectare neighbourhood area covering the Old Oak half of the OPDC area and surrounding residential enclaves. This

proposed boundary had received 82% public support amongst 198 consultation responses. The consultation had followed over a year of discussion with OPDC officers and a presentation to the OPDC Planning Committee.

An officer report was prepared (including external legal advice) to identify grounds for refusal of the proposals from the Interim Old Oak Neighbourhood Forum. The OPDC Planning Committee and Board designated a much reduced area of 22 hectares within East Acton ward as an Old Oak neighbourhood boundary (the designation of some part of a neighbourhood area as applied for being a legal requirement of the 2011 Localism Act).

As was said in a letter to all Board members at the time *'In agreeing the recommendations before the Board, you are being asked to frustrate for people living in and around the Old Oak area the one opportunity provided by Parliament for in depth involvement by local people in the planning process. We cannot understand why you should want this outcome?'*

We believe that OPDC will in time come to see that refusing this proposal for a large-scale Old Oak neighbourhood area was a mistake. Neighbourhood plans, now in force in over 700 areas across England (and 13 in London) provide a flexible and responsive means of putting in place policies and site allocations in a shorter timeframe than the Local Plan system allows.

There have been many delays in the Corporation's Local Plan preparation. As revealed at the Budget and Performance Committee, the expected date for adoption of the OPDC Local Plan is three years later than that forecast in the 2015 OAPF (now early 2020 as opposed to Spring 2017). The outcome of the Examination remains uncertain.

A collaboratively prepared Old Oak Neighbourhood Plan (such as was proposed by the neighbourhood forum in 2016) could by now have been completed. The site allocations and policies within such a plan could have been adjusted during its preparation to take on board the changing circumstances that OPDC has faced over the 2016-2019 period.

As made clear in the Forum's designation application (paragraph 7.2) Cargiant had consulted closely with the Forum and other local groups on its own proposals for 'Old Oak Park'. These plans and proposals were not creating major local opposition. The time limited opportunity for Cargiant to relocate might have been achieved. A neighbourhood plan for the whole of Old Oak would not have been 'anti-development' where proposed development was of the right kind in the right place.

Under the 2011 Localism Act, the HS2 station interchange would have been 'excluded development' in relation to a neighbourhood plan. Hence HS2 plans would have been unaffected. The need for a neighbourhood plan to have 'general conformity' with the London Plan and existing Borough Local Plans would have raised some interesting issues. But these might have proved easier to resolve than the present impasse between Cargiant and OPDC.

Local residents continue to regret that OPDC chose to reject what could have become an innovative use of the most local layer of the English planning system, to create a flexible set of planning policies and site allocations in an area where uncertainties have proved to

dominate the planning context. The Corporation's stifling of this opportunity was raised at the GLA Planning Committee session on *Neighbourhood Planning and London's Communities* on 25th April 2019.

5. The decision not to re-appoint the one designated 'community Board member' on the OPDC Board.

Local residents remain unhappy about this 2018 decision. This is not only because of the loss of the valuable channel of communication that had been established between Victoria Hills and Amanda Souter, but also because of the subsequent misinformation given out by OPDC and the Mayor's Office on the process of recruiting new Board members.

The Board decision not to re-appoint Amanda Souter was queried with the Mayor's Office by Andrew Slaughter MP in October 2018. The response from David Bellamy (Chief of Staff to the Mayor) was that *'Both Sadiq and Liz Peace are keen to appoint a number of members with a strong link to and understanding of the local area, whilst ensuring that they can contribute across the Board's range of responsibilities. We are not seeking to appoint people to act as 'representatives' of the local community; this role is filled by the leaders of the three borough councils'.*

It is clear from the recommendation in the Fiona Fletcher-Smith Review, as quoted above, that the original composition of the OPDC Board included a designated position of 'community Board member' (alongside a business representative). There was no Board discussion or decision on ending this arrangement, prior to advertising the 2018 'refresh' of Board membership (unless this happened behind closed doors).

Following the 2018 Board 'refresh' there was a botched attempt to present certain of the new Board members as undertaking a 'community representative' role. This term was applied to the new Board members in an early draft of the Corporation's *Engagement Strategy* in January 2019. This is a role to which these new Board members were not appointed (according to the David Bellamy email) and which they have not carried out. It is a further example of the Corporation falsely claiming 'community' credentials which has backfired badly in terms of local perceptions.

Local activists and residents in the OPDC area, who have been involved in preparation of the OPDC Draft Local Plan since 2014, do not consider the three OPDC Board members appointed in 2018 (Michael Simms, Shevaughn Rieck and Natalie Campbell) to have *'a strong link to and understanding of the local area'.*

In the 8 months since their appointment, none of these three individuals have made contact with, or attended open meetings of, either the Grand Union Alliance or the Old Oak Neighbourhood Forum. Over the past three years, these two local bodies have regularly brought together the resident and community organisations in the area, and have been co-ordinating responses to the OPDC OAPF, Regulation 18, and Regulation 19.1 and 19.2 versions of the OPDC Draft Local Plan and giving evidence at the EIP.

Regrettably, OPDC continues to misrepresent this episode in its public statements. The Corporation's Annual Report as approved at the May 30th 2019 Board meeting states that

Amanda Souter ‘stood down from the Board in the past year after three years of dedicated service’. She did not ‘stand down’. She applied in response to the OPDC advertisement for Board members, seeking to be re-appointed for a second term, and had her application rejected.

6. The style and approach of OPDC in its publications, consultation events, and ‘engagement’ activities.

The inherent tensions between the combined roles of OPDC as statutory local planning authority and ‘delivery agent’ have added to the perceived bias built into OPDC’s efforts at ‘community engagement’.

The OPDC Engagement Team has spent many months preparing an *Engagement Strategy*, with the latest version now out for [public consultation](#). This document defines the ‘three main functions’ of the Corporation, the first being *Mayoral Development Corporation (MDC), for example, the corporate plan and brand, defining our vision, mission and values, finance and HR*. The roles of local planning authority follow as the second and third ‘main function’.

As had been pointed out on earlier drafts, this gives the impression of a staff team that is more pre-occupied with promoting the brand and corporate plan of the Corporation than giving clear information to the public on the core functions and actions of the OPDC.

While it is understandable that OPDC should wish to accentuate the positive in its [press releases](#) (as do many London Boroughs) the content of these releases is now greeted with cynicism by Old Oak residents.

In announcing the outcome of the HIF bid, there was no explanation whatsoever that this £250m remains subject to what the Assembly’s Budget and Performance Review Committee were told on June 11th are very demanding conditions. The details of these conditions are not yet available to the public, and seemingly not to Assembly members.

The fact that the originally proposed two Overground stations are now ‘*absolutely off the agenda*’ (in the case of Hythe Road) and ‘*still a possibility*’ (in the case of Old Oak Common Lane) also emerged at the Budget and Performance Review Committee on June 11th. There have been no OPDC press releases or public statements to this effect, and these ‘potential’ stations continue to feature in maps and text within the Draft Local Plan.

The existence of the Hythe Road station was used in 2017 by the OPDC Planning Committee as justification for granting planning permissions for a series of residential towers at densities of 400 units/ha and above in Scrubs Lane NW10. While all these developments have since stalled, they were cited at the recent Budget and Performance Committee as ‘early developments’ creating 2,000 new homes. If ever built, these will be homes with very poor public transport accessibility for the indefinite future.

Londoners make decisions on whether to move house or flat, on the basis of public transport access. It is unacceptable for OPDC to fail to inform the public when the realities

of their Local Plan proposals change (seemingly many months ago in the case of a possible Overground station at Hythe Road).

In organisational terms, the OPDC 'Communications and Engagement' team combines the two sets of functions of press, PR and marketing alongside the staff working on community engagement, under a single Head of Communications and Engagement. Combining these two functions carries inevitable risks of credible 'engagement' activities becoming subsidiary to marketing and promotion.

From the perception of local residents, the team needs some real experience of community engagement, of the kind hard won within organisations such as the London Boroughs. These are bodies which have had to prove over time to listen to their public and to earn the trust of their citizens. Such skills in genuine 'engagement' do exist and are much needed within OPDC.

7. A lack of honesty and transparency on key information with Local Plan documents

Two examples are briefly outlined below.

- The OPDC 19.2 Draft Local Plan includes at Table 3.1 at page 46. This is a schedule of 34 individual site allocations. Each specified site has a minimum target for housing units. Each site is of a known size. Consultation responses at each iteration of the Local Plan have asked for an additional column of figures to be added to this schedule, showing the resultant housing density in units/hectare for each site (at the generic mix of dwelling sizes that the Plan proposes). The final OPDC submission version of the Plan fails again to include these figures thereby depriving the public of one of the basic measures that indicates the likely building typology that will be developed on each site.
- When questioned at public consultation sessions on whether the Local Plan envisages residential building heights of 20, 40, 60, or 70 storeys (as at Isle of Dogs) OPDC officers give no answers, stating simply that each application will be judged on its merits and the specifics of each site. This is not being honest and straightforward with the public, given the planned average densities to be achieved. The [Tall Buildings Statement](#) supporting the Local Plan gives no such information, merely defining a 'tall building' as one over 15 storeys or 48 metres above ground.

8. Inadequacies in formal governance and transparency arrangements

Concerns of local residents on these issues were raised at the meeting with Liz Peace and Mick Mulhern in January 2019. The list of concerns raised has included:

- Lack of transparency on use of Planning Performance Agreements. In a number of London Boroughs there are growing public concerns over the same planning officer being responsible for providing planning advice (on a fee earning basis) while subsequently preparing committee recommendations on the same application. Initially the OPDC website gave no information at all on PPAs and the extent of their

use. It now contains [brief material](#) on this topic. Nearly all the applications determined by OPDC Planning Committee have in fact involved these bespoke agreements negotiated with developers.

- Lack of transparency on OPDC registers of gifts and hospitality, and inconsistencies with arrangements applied across all GLA staff
- Register of Interest Statements for OPDC Board and Planning Committee members that have been missing from the OPDC website.
- Queries on the OPDC Planning Code of Conduct and on the role and content of 'private briefings' of committee members held in advance of Planning Committee meetings.
- Potential conflicts of interest for staff working for the OPDC as statutory planning authority and as 'delivery agent'.

Liz Peace as OPDC Chair has provided written responses on most of the concerns raised, and action has been taken to remedy gaps in information provided on the Corporation's website. The OPDC Board at its 30th May 2019 meeting adopted a new protocol for staff, setting out requirements for a separation of roles between OPDC's role as a planning authority and as a delivery body.

It is welcome that OPDC has responded on these matters, but for this to happen it has been necessary for them to be raised by the public rather than from within the organisation or from elsewhere within the GLA.

Potential future challenges for OPDC

These eight issues are the main concerns that have emerged amongst local residents in the Old Oak area. We have also been asked to comment on what would be the view of local people were the HS2 project to be cancelled by an incoming Prime Minister and Government.

In such an event, as we see it, there would be two main options open to the Mayor and the three London Boroughs involved:

1. Accept that the original case for a Mayoral Development Corporation has gone and wind up the Development Corporation, with planning powers reverting back to the Boroughs.
2. Continue with the Development Corporation (perhaps in more limited form) and restarting the process of Local Plan preparation.

We see little merit in option 2 above. There seems no reason why the Boroughs should not take back planning responsibilities if HS2 is cancelled. As it is, most of the new development that has reached construction stage in the OPDC area since April 2015 has been granted permission by LB Ealing and not by the OPDC, as a result of the delegation arrangements for North Acton agreed between OPDC and Ealing Council.

Under Option 1 the three Boroughs would revert to determining planning applications in what had been the OPDC area, using applicable borough-wide policies in the own Local Plans. Partial Reviews of these Local Plans could reinstate specific policies for these areas, within a timescale probably shorter than that were the OPDC to go back to square one on its own Local Plan.

In addition, we would favour the OPDC (prior to it being wound up) designating the 280 hectare Old Oak neighbourhood area as originally applied for in 2016. This would provide potentially the fastest route to have new policies and site allocations in place, and to ensure that these were well supported by existing local communities in the three Boroughs involved.

Under either of these options, the Forum would make the case for:

- A much more evolutionary approach to the development of this part of London, recognising that GLA population forecasts of growth to 11m may prove to be wrong should Brexit happen. A repeat of the 1940-1990 period of a shrinking rather than increasing population within London is far from inconceivable.
- New housing at densities appropriate to a part of London that continues to have poor public transport access and low PTAL levels (apart from sites close to Willesden junction and East Acton Underground).
- Housing typologies and designs that are well integrated with the existing residential areas of Wells House Road, Midland Terrace/Shafesbury Gardens, the TITRA streets of railway cottages, College Park, Wood Lane/Eynham Road Triangle, DuCane Road and the Old Oak Estate.
- A significant element of low cost low-density self-build housing with a short 10-15 year lifespan, allowing for uncertainties in London's future population levels and in the extent of investment in new transport infrastructure.
- More flexible policies than in the current OPDC Local Plan on mixed use and co-location of employment and residential floorspace in those parts of Park Royal best suited for such use (e.g. 'Old Park Royal', Disraeli Road and Grand Union canalside).
- More intense redevelopment around Willesden Junction station, and improvements to the station as an existing significant transport hub.
- Improvements at North Acton station to allow for increased numbers of travellers.
- An additional low specification Overground station beneath the Westway elevated roundabout next to Wood Lane. This option of an Overground station at 'Westway Circus', filling the existing long gap on the West London Line between Shepherds Bush and Willesden Junction, has long been promoted by the West London Line Group and is included as an aspiration in the new Local Plan for RB Kensington and Chelsea.

We believe that these sorts of policies would allow a new part of London to evolve from the bottom up, rather than fall victim to an ill-conceived spatial plan imposed from above.

The Draft Local Plan that was in preparation by LB Hammersmith & Fulham in 2015 included options for the future of what was then defined as the 'Old Oak Regeneration Area'. These included the alternatives of higher or lower housing densities, avoiding the use of tall buildings, and (importantly) waiting until new transport infrastructure was in place before encouraging large-scale regeneration.

As we have pointed out to Planning Inspector Paul Clark at the EIP session on June 6th, these are the sort of 'reasonable alternatives' that should have been included in the OPDC's Regulation 18 Local Plan and IIA/Strategic Environmental Assessment. This did not happen, and the OPDC is now left with a Draft Local Plan the realism, viability and 'soundness' of which appear to be highly questionable.

Suggestions for the way forward on OPDC community engagement

We have the following suggestions to make to the Assembly, the Mayor and the OPDC Board:

- a) OPDC should recreate a designated Board position for a 'community representative' and establish an 'electoral college' made up of accredited community organisations in the area, through which a preferred nomination is passed to the Mayor for appointment. This would provide clarity that this Board member is genuinely representative of the views of local residents and is acting as a community voice and (when necessary) a 'critical friend' in Board discussions.
- b) OPDC should continue discussions with the Grand Union Alliance and the Old Oak Neighbourhood Forum on the best means of establishing an improved dialogue. This should include an offer of financial support (potentially with contributions from the three Boroughs) for a part-time co-ordinator post to support both these local organisations and to liaise with HS2 and the Boroughs on the many immediate issues affecting quality of life for local people during construction works in the Old Oak area.
- c) the OPDC community engagement function should be separated within the organisation from the Corporation's communications and marketing functions. Engagement staff should learn from best practice amongst London Borough Councils.
- d) in adopting a final version of the Board's Engagement Strategy, the Board should direct the Engagement team towards communications, activities and dialogue that
 - are focused on the Corporation's main functions and responsibilities as statutory planning authority and delivery agent
 - makes clear in which of these capacities the Corporation is acting at any time
 - devotes less time and staff resource to activities which are peripheral to these core functions (Great Place Scheme, Good Growth Fund projects)
- e) OPDC Board should accept that the Corporation has limited democratic accountability and hence needs to be more open to questioning and challenge from local people. Such challenge can be productive.
- f) OPDC Planning Committee, even at this late stage in the Local Plan process, should ensure that the final Plan and supporting documents provide transparent, objective and honest information to the public – even where this may be perceived as potentially detrimental to the ambitions of the 'delivery arm' of the Corporation.

There will be no public confidence in the Local Plan if its content is seen as being dictated by delivery targets that have proved unrealistic, but which other parts of the Mayoral family (TfL and GLA planners) are perceived as colluding to support.

Conclusion

We understand that Cargiant has asked to give evidence to the Assembly's Budget and Performance Committee and the Forum would welcome a similar opportunity.

To date the level of public scrutiny and debate on the OPDC and on its Draft Local Plan has been limited. A number of local residents with the capacity and time to attend consultation sessions and meetings at City Hall have been active, but there has been little coverage of OPDC activities in London's press and media.

As Cargiant points out, expenditure to date by OPDC has been very substantial (Cargiant estimate £29m in the past 4 years). OPDC is now seeking additional in-year 'cashflow' and underwriting of the HIF bid, from GLA capital and revenue resources already under pressure.

The Corporation's approach and strategy need urgent review by the Assembly, in the context of greater openness by OPDC and with the full background to the Corporation's HIF bid and MHCLG response made available to the public.

Old Oak Neighbourhood Forum

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