

‘A NEW FOCUS FOR OLD OAK AND PARK ROYAL’ – QUESTIONS FROM LOCAL COMMUNITY ORGANISATIONS

These questions to the OPDC relate to the [press release](#) issued by the Old Oak and Park Royal Development Corporation (OPDC) on 13th December 2019. We have also reviewed the [OPDC Budget submission for 2020/21](#) published on 16th December which has prompted some further questions.

The questions are under three headings:

- Planning issues and changes to the OPDC Draft Local Plan
- Financial and budget issues
- Governance issues

Planning issues and the OPDC Draft Local Plan

1. The OPDC press release states *The regeneration of Old Oak, Park Royal and surrounding areas in west London has the potential to deliver 25,500 new homes and 65,000 jobs over the next 30 years.* Now that Cargiant’s 44 acres are not to be developed for housing, will it be acknowledged in the next iteration of the Local Plan that this 25,000 figures is a very distant aspiration? And what total of new homes will be included for the plan period (which we understand to be 2018-38)?
2. What alternative plausible sites have been identified to replace the Cargiant land removed from the Draft Local Plan. Which of these alternative sites will feature in the all important site allocation table at 3.1, as sites designated for housing within the plan period?
3. The 2020/21 OPDC Budget submission refers to *‘a more strategic scale of regeneration for the extensive sites to the north and west of the proposed HS2 interchange at Old Oak’.* What sites are these? Currently ‘Place P1’ in the Local Plan (old Oak Commons Station and surroundings) is destined to accommodate only 350 new homes in years 11-20 of the plan period.
4. To the north of the HS2 interchange is the Crossrail depot and sidings. Is OPDC looking again at the costs and viability of overdecking the Elizabeth Line depot as a means of proving additional housing floorspace, as suggested by Planning Inspector Paul Clark in his September 2019 report?
5. What phasing is envisaged for housing development *‘to the north and west of the proposed HS2 interchange’.* Will such development happen after completion of the station (now forecast as 2028)? Or will ‘early development’ be undertaken alongside construction of the station?
6. Are OPDC and HS2 looking at alternatives to the brief previously issued by HS2 for ‘Adjacent Site Development’ on the 2.8 hectare site to the west of the proposed HS2 interchange? This was for 146,000 sq m of office development and no housing. If residential uses were to be added, what building heights and housing densities is OPDC now envisaging at this location?
7. Is OPDC now looking to a major rebuild of Willesden station with housing above or adjacent, rather than the modest improvements envisaged in the OPDC Draft Local Plan?
8. Is OPDC considering a more flexible approach to retention of Strategic Industrial Land, allowing more mixed use development in the transitional area between Old Oak Common and Park Royal to provide for ‘co-location’ and more housing at reasonable densities (as advocated by local groups in consultations on the Draft Local Plan).
9. Without the use of the £250m of Housing Infrastructure Funding provisionally allocated in March 2019, how will necessary infrastructure costs at Old Oak be met? Is a new and separate HIF bid

being considered? Or is the focus now on other possible sources of infrastructure funding from a new Government?

10. Is the proposed east/west route 'Park Road/Union Way' now off the agenda, or does it remain part of the Local Plan, re-routed to avoid Cargiant land?

11. What is the latest timetable for changes/modifications to the Draft Plan to be prepared, and discussed at the OPDC Planning Committee and OPDC Board prior to public consultation?

12. Given that the changes and modifications to the Regulation 19.1 Draft Local Plan are now so fundamental, will the Inspector be invited/encouraged to hold further examination sessions in public, following what was due to the last of these sessions held on July 20th 2019.

13. With hindsight, would it have helped had OPDC revealed to the public more of the detailed work on its 'Old Oak masterplan' back in early 2018, as originally promised to the public? The resultant scrutiny and questioning by landowners, the planning press, the development industry, and local people might have prompted an earlier change of direction and less abortive expenditure.

14. The OPDC press release states *The shift in approach has been triggered by recent, rapid increases in industrial land values in west London which mean that it is currently not financially viable to deliver OPDC's early regeneration plans at Old Oak North.* The quote from David Lunts says *With the price of industrial land shooting up four or five-fold in as many years, earlier plans to bring forward Old Oak North are unfortunately not currently viable.* Given its use of expert consultancies, why was OPDC failing to factor these land value changes into its Local Plan preparation?

15. Will the fourth version of the OPDC Draft Local Plan provide clear explanations of proposed housing densities for each of the sites allocated for housing development (as requested by local residents in consultation responses to the previous three iterations of the Draft Plan)? Or will local groups have to continue making representations on lack of transparency in the document?

Financial issues

16. The scaling down of the OPDC budget for 2020/21 will be welcomed locally as a contribution towards minimising the GLA precept. The OPDC Budget submission does not explain what has happened on the supplementary budget of £10m approved by MD 2493 in July 2019 *'to support the Corporation in securing the Government's Housing Infrastructure Funding (HIF) allocation for Old Oak North'*? A 'revised budget' for 2019/20 is shown as £12.9m and a 'forecast outturn' of £11.9m. What was the original OPDC budget for 2019/20?

17. What part of this supplementary budget of £10m will have been spent by OPDC in the period June 2019 (when this sum was approved) to April 2020, including any outstanding contractual commitments to consultants working on now redundant activity in relation to Cargiant land?

18. What has been OPDC expenditure on work related specifically to Cargiant land, from April 2015 to December 2019, including:

- 'Land assembly and engagement with landowners' as described in the report to OPDC Board on 29th March 2019.
- Fees paid to land registration consultants Persona Associates and 'public affairs' consultants Grayling on the above.
- Relevant fees paid to AECOM as the lead consultancy commissioned by OPDC to work on the Old Oak masterplan

- External costs of the preparation of the Old Oak North Development Framework Principles document, prepared by AECOM and their subsidiary consultants, Maccreanor Lavington Architects, Peter Brett Associates and Spacehub
- An estimate of inhouse work by the OPDC 'delivery team' on Old Oak North over the period April 2015 to December 2019

Not included in the above are the costs of in-house work by the OPDC planning team, in preparing and consulting on the Old Oak North section of the Regulation 18, 19.1 and 19.2 versions of the OPDC Draft Local Plan. We accept that the planning context of the OPDC area has always been complex and can change significantly over time. We acknowledge that costs of 'plan-making' can often prove abortive, as has been the case in several of London's Opportunity Areas.

The concern in this instance is to establish the costs of work undertaken by the OPDC 'delivery arm' and external consultants on Old Oak North as there will inevitably be questions from local residents on an area of OPDC work which has very largely been kept from the public and on which FoI/EIR requests have been refused. Based on what emerged at the EIP on the Draft Local Plan and in the Inspector's interim report, and from other sources of information, we believe that the majority of this expenditure could have been avoided by more open dialogue at an earlier stage, with Cargiant and with local people.

Governance issues

19. The 'note to editors' which forms part of the press release states *The draft budget has been approved by the OPDC board and is now subject to the overall GLA budget setting process, including scrutiny by the London Assembly.* The OPDC Board has not met since September 26th 2019. There were no reference in previous reports to the Board to a change of direction on Old Oak North. Concerns over the lack of discussion at Board meetings on key challenges facing the Corporation, coupled with its routine use of private and informal sessions, was raised by the St Quintin and Woodlands Neighbourhood Forum as a governance issue, after the September Board meeting. How was the radical change of direction on Old Oak North, and the resultant OPDC Budget submission, 'approved' by the Board? Was this via one or more informal private sessions of the Board, via email communication with Board members, or by use of the OPDC's scheme of delegation to officers?

20. The 'note to editors' continues by saying *Further details on the revised approach will be presented for formal approval at its January board meeting.* This meeting is not scheduled to take place until January 30th, some 6 weeks after the announcement of the decisions on a major change of direction on the OPDC Local Plan and on the 2020/2021 OPDC budget. If these decisions have already been made, through informal means, why cannot the supporting information from OPDC officers be published now in mid December? Use of informal decision-making processes denies the public their normal right to request background papers under the 1985 Access to Information Act.

21. An OPDC Board meeting at which all the above issues could have been aired, at a session open to the public, was scheduled for 21st November. This was cancelled (as we understand) on grounds of 'purdah' restrictions prior to the December 12th General Election. We would like to know who made the decision to cancel this meeting, given Local Government Association guidance that local authorities can continue with normal business (including determination of planning applications even when controversial) during the 'purdah' period?

22. In response to queries on lack of transparency by OPDC, made prior to the 12th December news release, Interim Chief Executive David Lunts wrote to the StQW Neighbourhood Forum stating that *the Corporation is bound by statutory constraints during the formal pre-election period, which will*

require that public discussion of these and other potentially contentious issues, are postponed until after the forthcoming general election. The statutory constraints that underpin purdah restrictions in local government derive from Section 6 of the Local Government Act 1986. These do not halt the conduct of normal local government business, prior to a General Election. They do (at all times, but especially in the run up to elections) require local authorities:

- To ensure that public resources are not used for party political purposes, in terms of the content of publicity materials, staging of events and communications generally
- Not to undertake any activity which could call into question their political impartiality

There is no prohibition on decision-making by local government bodies during the pre-election period. The OPDC is not a politically led body, and this was not a GLA election. Hence local suspicions that the cancellation of the November 21st Board was largely motivated by a wish to avoid scrutiny of the questions raised by the Corporation's sudden change of direction.

Conclusion

These questions are asked of the OPDC in a context where there have been growing concerns amongst residents organisations and community groups in the OPDC area about the overall approach of the Corporation to its Draft Local Plan, its unwillingness to listen to major landowners as well as to local people, and on its governance and decision-making.

These concerns have been raised regularly with OPDC at meetings and in correspondence since late 2018 and are detailed in posts on the websites at www.oldoakneighbourhoodforum.org and www.stqw.org

The 'new focus' announced in the December 13th OPDC press release is welcomed locally as a sign that the Corporation has been willing to change its mind rather than risk a prolonged and expensive legal battle with Cargiant.

We hope that OPDC will prove willing to reset its relationship with local groups and neighbourhood forums and will prove more willing to engage in open and genuine dialogue about how best to plan for and deliver a new part of London. If not, pressure will mount to return planning powers to the three Boroughs and wind up the Corporation.

The agreements now reached with Cargiant will (we hope) be followed up with a more realistic approach to housing targets and a more sober view of the long-term potential of what is but one of several major Opportunity Areas across London. Old Oak and Park Royal were never likely to develop as the 'Canary Wharf of the West' given site and infrastructure constraints. Even beyond 2028, for those living or working in the area, transport connectivity will not be 'outstanding' (as claimed in the latest OPDC Budget submission) now that new Overground stations are very unlikely to materialise. More humility and less hype from the Corporation would be appreciated locally.

Public confidence in London's planning system and the ways of the development industry is low. Major private sector schemes such as Earls Court have foundered, with huge abortive costs and swathes of land left empty. These costs were shouldered largely by Capital & Counties. Londoners will not be forgiving of a similar scenario at Old Oak, when this time it is public money at stake.

Old Oak Neighbourhood Forum
St Quintin and Woodlands Neighbourhood Forum
December 17th 2019 email to info@stqw.org