



## OLD OAK NEIGHBOURHOOD FORUM

David Lunts  
Chief Executive Officer  
OPDC  
(by email)

December 23<sup>rd</sup> 2021

Dear David,

### **OPDC Strategic Business Case and EIP hearings on the Draft Local Plan on 11<sup>th</sup>/12<sup>th</sup> January**

We are following up on a couple of the exchanges at the session of the Assembly's Budget and Performance Committee on 8<sup>th</sup> December (copy of GLA transcript of the meeting attached).

**Krupesh Hirani AM:** *OK. At the Plenary meeting last month, you said that very shortly you would have a strategic outline business case in front of Government and Ministers. Has this now been submitted to Government, and what are your key asks?*

**David Lunts (Chief Executive Officer, Old Oak and Park Royal Development Corporation):** *No. As I said, we have not submitted it yet. We are finalising it literally over the next few days with a view to submitting it this side of Christmas. It will cover, primarily, the case for an organised arrangement or transfer into a single agency of the Government and Government agency landholdings. That is the very important building block for the new strategy. It will also surface these points about the need for a funding deal, which may take the form of a substantial amount of money to purchase that land, or it could be a more modest sum if the Government were to decide it wanted to treat that land as a long-term investment position rather than a short-term receipt. Those are going to be the key themes in that strategic case.*

**Krupesh Hirani AM:** *In terms of the document itself, will this or any other Committee at the Assembly be able to review the document?*

**David Lunts (Chief Executive Officer, Old Oak and Park Royal Development Corporation):** *Certainly, our intention would be that the document ought to be published. It may well be that we will need to make some redactions because some of it will involve commercial sensitivities around particular site valuations, etc. Certainly, subject to the views of Government colleagues because they will need to give us a view as well, our intention would be to share that with Assembly Members.*

**Krupesh Hirani AM:** *Have you made an assessment in the document about the level of infrastructure that is needed to support development and how much this would cost?*

**David Lunts (Chief Executive Officer, Old Oak and Park Royal Development Corporation):** *Yes, we have. We have a detailed infrastructure plan which I would be very happy to share with the Assembly at some point. If you wanted to have a more detailed and thorough discussions around the strategic*

*outline case and some of the assumptions we have made in that document, then I would be very happy to come back in the New Year and share those.*

**Krupesh Hirani AM:** *Thank you. Chairman, we should definitely take that forward because we need to see what is in it.*

**Susan Hall AM (Chairman):** *Yes, we do.*

We are very concerned to ensure that Planning inspector Pail Clark has sight of this business case before what may be the final Local Plan EIP hearings scheduled for 11 and 12 January. We do not see how he can make an informed assessment of the effectiveness and soundness of the Draft Plan, without any opportunity to review this business case.

In the first half of 2019, when the Inspector was holding the previous round of examination hearings, I alerted him to the fact that OPDC was refusing to make available a copy of the HIF bid, and of the MHCLG conditions attached to this. This was despite Fol/EIR requests submitted to OPDC in [April 2019](#) and in [July 2019](#).

At the time, the Inspector seemed unconcerned to see this material. The documents became public only after the exercise of statutory powers by the Budget and Performance Committee, as you know. In the meantime the Inspector had formed his own conclusions on the viability of OPDC plans for Old Oak North, as set out in his September 2019 Interim Findings.

The Assembly's B&P Committee has already investigated the consequences (and costs) of this sequence of events. We continue to believe that the OPDC Draft Local Plan should have been put back on track in late 2018, in the knowledge of Cargiant's position. As you know we have made submissions to the Inspector that OPDC knowingly submitted its Draft Local Plan in September 2018 at a time when Cargiant had already made clear its opposition to the masterplan for Old Oak North and to the HIF bid.

During 2019 OPDC chose not to reveal relevant documents either to the Inspector or to the public (or to Assembly Members first time round). The Inspector is now taking legal advice on whether OPDC's submission of the Draft Plan on October 4<sup>th</sup> 2018 met the requirement of s20(2) of the PCPA 2004 that a draft plan should be *ready for independent examination*.

For obvious reasons, we do not wish to see a repeat of the 2018/9 scenario in the closing stages of what has become a local plan examination of 3 years and more. Assuming that the OPDC Strategic Business Case has now been finalised, it may be that OPDC has already sent a copy to the Inspector? This business case is highly relevant to the deliverability of the Local Plan and to two of the four issues on which further evidence will be explored at the January EIP hearings (PTAL levels/connectivity and conformity with London Plan Policy D9 on Tall Buildings). Redacted where necessary, we ask that the document be placed in the Local Plan Examination Library, before the EIP hearings on 11 and 12 January.

Yours sincerely,

Henry Peterson, Adviser to the Old Oak Neighbourhood Forum  
cc Susan Hall AM. Chair London Assembly Budget and Performance Committee  
Liz Peace CBE, Chair of the OPDC, Emma Williamson Director of Planning OPDC  
Charlotte Glancy, Programme Officer for the OPDC Local Plan Examination  
Mark Walker Chair Old Oak Neighbourhood Forum, Robin Brown GUA,