



25th November 2022

Dear Chair and Members of the Planning and Regeneration Committee

Follow up to the Committee's session on 23rd November

Thanks for the invitation which you offered towards the end of the meeting, for our neighbourhood forum to contribute some thoughts on the discussion at this meeting. We found it a valuable session to watch and listen to. As conveyed by the invited guests from Just Space, we would have liked to be present and to answer questions. We hope that this letter helps you, and Emma Best AM as the Deputy Chair, to decide on follow up actions.

The need for a review of OPDC

Our submission to the Budget and Performance Committee, sent last week, set out in detail why we think that a further full review is needed:

- There is a statutory requirement on the Mayor to review MDCs from time to time. The last review of OPDC was in 2016 and much has happened since then.
- David Lunts at your committee's session outlined OPDC's current thinking and timeline for submission of an Outline Business Case to Government (in summer 2023). He explained how the hoped-for transfer of public is critical to the whole OPDC mission.
- We still worry that even were this OBC to be agreed next year, the timetable for the release of the HS2/DfT sites from use as construction compounds is not until the late 2020s/early 2030s. These 4 sites total 38.4 acres of cleared land. For the 15 acres of land at Atlas Road/Channel Gate (destined to be part of a new major town centre for Old Oak) the HS2 forecast for releasing the site is Q2 2032. HS2 acknowledge that this could slip, as construction at Euston is involved.
- Old Oak West is therefore a decade away from seeing buildings at this key location to start coming out of the ground. As we have seen in recent months, any Government decisions on infrastructure support can be reversed within weeks (Investment Zones launched and then cancelled).
- **How can the public be confident that the current intensive (and expensive) work being undertaken by OPDC in trying to gain long-term control of these sites is worthwhile**, if the development involved cannot begin to be built out for a decade? There could be several Governments and a continued succession of Ministers at DfT and DLUHC between now and 2030. Development takes time to reach construction stage. But not this long.
- This is why we have argued that the whole remit of OPDC, with its local plan and its associated delivery ambitions, has now fallen out of sync with reality on the ground. The position is very different from that expected when the former Mayor decided in 2015 to establish the Corporation (when OOC station was due to open in 2026).
- **Timings on when the next stages of planning and delivery should sensibly take place need an urgent review, if not some radical rethinking.** The background to OPDC's discussions with Government on the public land transfer, and any new funding that might come with it, is one of the most opaque and least transparent aspects of all the Corporation's activities.

- We believe that a full review of OPDC should include some independent examination of OPDC's prospects for gaining control over the public land at Old Oak West. It should also assess the planning consents granted to date by OPDC (and by LB Ealing on OPDC's behalf) in the context of London Plan criteria for Good Growth.
- Our concern is that the 2015 ambitions for Old Oak are being compromised severely by the inherent conflicts between the planning authority role of a MDC, and a set of delivery targets that became unrealistic once detailed planning of possible sites and the local transport network was undertaken.
- The results are proving to be the wrong types of development in the wrong places, granted planning consents too soon and before any coherent 'new Old Oak' emerges as a successful part of London.
- As discussed at the Committee session, this 'London Model' of financing major redevelopments with heavy infrastructure costs and social housing imperatives from S106 evidently is not working. The major research on OPDC by Professor Jennifer Robinson (referred to on 23rd by Dr Myfanwy Taylor) concludes that this model has led to increments of height and density being added to designs in a fruitless attempt to cover all the costs. It has been a spiral to nowhere caused by the fact that OPDC was set up with neither land nor capital funds.
- **At the least, the Assembly needs to take a hard look at OPDC and to consider whether returning planning powers to the Borough, alongside a much slimmer delivery vehicle, would be better way forward for the decade 2022-2032 (the date when OOC station is likely to be fully operational).**

Background

OPDC and the Mayor announced in June/July 2022 that the first stage 'Strategic Outline Business Case' had been 'approved' by Government. When we asked to see the Government letter to this effect, we were told that no such letter exists.

For Londoners who saw several millions written off on the abortive work on the 2018 OPDC bid for Housing Infrastructure Funding, this rang alarm bells. Our three attempts under FoI/EIR to obtain information on the HIF bid and the subsequent MHCLG 'conditionalities' letter were refused. Only intervention by the Budget and Performance Committee achieved the [publication of this material](#), in the end with few redactions.

The OPDC Board met on the afternoon of 23rd November (the day of your committee meeting). HS2 gave a lengthy presentation to Board members. As usual this focused on the technical achievements of construction to date of Old Oak Common station. **There was no information whatsoever (and no questions or discussion) on what will be happening on the 38.4 acres of DfT land in use as construction compounds. Nor on which agency will be overseeing delivery on these sites. Nor on when this might be able to happen?**

For the Board of the OPDC not to be discussing such matters we find very strange¹. This avoidance of an 'inconvenient truth' on the delayed timetable for opening Old Oak Common Station (from

¹ Similarly, for the OPDC Planning Committee not to be considering the implications of HS2's timetable when determining planning applications at 'Old Oak West', is also concerning. The guests from Just Space at your committee raised the issue of the inherent internal conflicts between the 'planning authority arm' and the 'delivery arm' of the MDC model. The Planning Committee needs to be given full and objective advice. We don't feel that this happened in the case of an application from Pocket Living for 457 housing units on a site immediately adjacent to the HS2 Channel Gate/Atlas Road HS2 construction compound. This application from

2026 to 2029-2032) is also reflected in decisions by OPDC on planning consents. The Corporation has become unduly keen to demonstrate a pipeline of development activity, despite knowing (but not publicising) the fact that no new 'major town centre' at Old Oak can start being built until the early 2030s.

What questions might a review look at?

Our detailed submission to the Budget and Performance Committee on December 7th (copied to Planning and Regeneration Committee members) set out a long list of issues which we feel need examining.

We listened with interest to Lyn Garner's explanation to your committee, on next steps at the LLDC including the handing back of planning powers to the Boroughs in 2024. She explained the model of a slimmed down MDC which would provide some strategic input, as well as continued direct management of services on the Olympic Park area as owned by the Corporation.

We suggest a similar model could be looked at in a review of OPDC (with the difference that OPDC owns no land at present and may never do so (other than that acquired through the GLA Land Fund contribution). The continuation for a decade of a scenario in which OPDC retains development management powers, is a worrying prospect for local people in all three Boroughs affected.

Evidence to date is that OPDC will never refuse a major planning application. The 'independent' members of the Planning Committee, mainly with a development background, outnumber the local councillors from the three Boroughs.

It is barely an exaggeration to say that all the consented residential developments are at 400-800 units per hectare and with buildings over 20 storeys (several at 30, 40 and 50 storeys and more). The industrial uses have mainly been data centres, managed by few staff and adding little to local employment opportunities.

One of the 'lessons to learn' by OPDC from the experience of LLDC (as articulated at your session by Lyn Garner) is to '*have the humility to change direction when things do not go to plan*'. OPDC has made one major change of direction in November 2019. But this happened because the Planning Inspector had identified that the centrepiece of the 'submission version' of the OPDC Local Plan (6,000 new homes and a major town centre on 45 acres of Cargiant land) was not a viable way forward.

Old Oak Neighbourhood Forum is not a NIMBY organisation, of the type characterised by David Lunts in your session on the 23rd. Nor is the Grand Union Alliance, the St Quintin and Woodlands Neighbourhood Forum, nor the Harlesden Neighbourhood Forum. It is true that we see a successful and sustainable Old Oak as needing building typologies and densities as per the National Model Design Code, rather than hyper-densities dictated by a never realistic 25,000 housing target. **But we are not anti-development in any form and have not encountered any group of residents who take this position.**

In terms of genuine collaboration and dialogue with local people, David Lunts spoke of an imminent period of 'co-design' and more intensive 'engagement' in the preparation of a SPD for Old Oak West. Our members ask '*co-design of what*' given that site allocations, housing numbers, and resultant densities and building heights are already baked into the adopted OPDC Local Plan? Establishing a

Pocket Living was granted consent on 17th November 2022, with no mention in the report or officer advice at the meeting of the 2032 forecast date for release by HS2 of their adjacent construction compound, destined by the mid 2030s to provide the shops and amenities that incoming residents will need.

Community Review Group with the limited role of inputting to pre-application advice (while a welcome initiative by OPDC) we do not see as meaningful involvement in overall plans for the area. Should you and the committee be minded to explore these issues further, we would be very happy to attend as guests. As the Just Space guests mentioned on the 23rd, we had been given the impression that OONF and other community groups would be invited to that session.

In the meantime we attach a PDF copy of a presentation which was given to the OPDC Planning Committee in September 2021. We hope that this shows how the several neighbourhood forums in this part of London (and the GUA as a cross-borough network) have worked together in thinking seriously about the best future for Old Oak and have ideas to suggest from the UK and abroad.

We are glad that you and your committee have chosen to look at the progress and track record of the two MDCs. We hope that this will prove the start, rather than the end, of a period of scrutiny of the future role of these two bodies. Lessons for the possible wider use of MDCs in other English cities may also emerge.

Tony Travers concluded at your session that these bodies 'are a least worst model' for major regeneration areas. Myfanwy Taylor from Just Space/UCL argued (rightly in our view) that this is a model from a past era of regeneration initiatives, in need of some serious rethinking if it is to serve Londoners well in the 2020s and 2030s. We very much hope that this will happen.

Yours sincerely,
Henry Peterson, adviser to the Old Oak Neighbourhood Forum

cc Andy Slaughter MP, Rupa Huq MP, Cllr Stephen Cowan, Cllr Peter Mason, Cllr Muhammed Butt, David Lunts CEO OPDC, Emma Williamson Director of Planning OPDC

Assembly Members on the Budget and Performance Committee,
Grand Union Alliance, Just Space (Professor Michael Edwards)
Professor Tony Travers LSE