

31st January 2023

By email

Peter Fortune AM
Chair, Budget and Performance Committee, London Assembly

Dear Peter,

Further to the meeting of the Budget and Performance Committee on 7th December, please see below responses to the three submissions from Old Oak Neighbourhood Forum (OONF), Just Space and Professor Jennifer Robinson. We have grouped our responses into key issues raised to avoid duplication, but if you have any further queries or would like us to expand on any points raised, do let me know.

1. The Mayoral Development Corporation model, funding and land

The representations submitted to the Budget and Performance Committee suggest that a Mayoral Development Corporation (MDC) is not the appropriate vehicle to deliver development in Old Oak and that OPDC's newly adopted Local Plan is not sound. As such, the representations conclude that alternative plans would be a better way forward.

OPDC is a statutory MDC with planning and other powers designed to drive forward regeneration around the new Old Oak Common High Speed 2 Ltd (HS2) interchange. It has been created by the elected and accountable mayor, with a governing board that includes the three elected local borough council leaders. It was established to optimise and capture the potentially enormous economic and public benefits at Old Oak Common, delivering mayoral priorities, including affordable homes, jobs and good growth. In an area like Old Oak and Park Royal, spanning three boroughs, multiple landowners, stakeholders and geographical constraints, an MDC with planning, delivery and compulsory purchasing powers, enables development to be unlocked in a focussed, coordinated and holistic way.

Without such a mechanism it is hard to see how such a complex project could be assembled or delivered. In addition, as a single purpose and entirely locally focussed organisation, OPDC offers a clear line of accountability and scrutiny for progress and performance of the regeneration programme, via the mayor and its board, that would be far more difficult to establish were such a vehicle not to exist.

OPDC takes its local accountabilities and engagement extremely seriously and works closely with colleagues in our three host boroughs, and with the full range of resident, business and amenity interests in our area. We engage closely and creatively to solicit community views and incorporate these in our work wherever possible.

The Old Oak North Neighbourhood Forum has suggested an alternative development proposal to OPDC's planning and development strategy, its professed 'Plan B' (see annexe a). I met with OONF to discuss this and they presented it to our Planning Committee in 2021. This plan is, however, predicated on three key assumptions – none of which have occurred. First, that our Local Plan is not found sound (it was); second, that HS2 is cancelled (it isn't); and third, that we fail to secure government funding (which hasn't happened). As such, this leaves the 'Plan B' somewhat hypothetical and immaterial, not least as it also assumes levels of development that are far below those required by the London Plan, and which would in any event be economically unviable to build at the low levels envisaged.

OPDC's Local Plan sets a high benchmark for quality, affordability, sustainability and placemaking, and is (as it is required to be) in conformity with both the National Planning Policy Framework (NPPF) and guidance, and the Mayor's London Plan. This was confirmed by the Government's Planning Inspectorate in April 2022 who concluded that our Plan was sound, and it was subsequently adopted by our Board in June 2022. The OONF's alternative plan would not be in conformity with either the London Plan or the NPPF and so could not be adopted even were the three incorrect assumptions it makes to be the case.

Prior to OPDC presenting its draft Plan and associated modifications to the Planning Inspector, they were subject to a carefully prepared and rigorous public scrutiny, both via extensive public consultation which gathered 12,000 representations (a summary is at annexe b) as well as several rounds of public examination where OONF, Just Space and Professor Jennifer Robinson presented their views to the Planning Inspector in some detail. Although the Inspector did not accept the main conclusions from these representations, OPDC did incorporate into our Local Plan a suggestion at the examination hearing from the Grand Union Alliance, regarding meanwhile uses in the area, which is an indication of our willingness to embrace local views where feasible and in-line with policy guidance.

Our adopted Local Plan provides OPDC with the planning policy framework that paves the way for major regeneration in the area, and we remain confident that the modifications made as a result of our change in strategy, are not only deliverable and viable, but provide a much improved and more holistic approach to deliver better outcomes both locally and beyond. By releasing the Strategic Industrial Location around the Old Oak Common station for mixed-use development, and protecting the land in Old Oak North for employment uses, it can enable homes and a new town centre to be better connected to the new station, with less costly infrastructure interventions to create a truly accessible, inclusive and thriving urban district. These modifications are also

supported by all major landowners, including HS2 and Cargiant, who provided statements of common ground which are published on our website along with the other Local Plan documentation.

Construction of Old Oak Common Station is well advanced. The suggestion that HS2 may be cancelled is no longer credible, and the Chancellor has as recently as 27th January 2023 confirmed that it will be completed, including the link to Euston.

The future of the HS2 work sites in the OPDC area, currently used for construction purposes, has promoted some speculation that they will not form part of the major regeneration planned for the area. This is inaccurate, as they are all earmarked for future release and are occupied exclusively for temporary construction purposes.

OPDC has been working very closely with colleagues in Department for Transport (DfT), Department for Levelling-Up, Homes and Communities (DLUHC), HS2, Network Rail and Homes England to bring forward a detailed business case for assembling and managing these sites, and others nearby, to create a strategic development platform for the regeneration of the area. OPDC's Strategic Outline Business Case (SOBC), which received DfT and DLUHC approval last spring, established the strategic case for this approach.

The release of the major works sites will be phased over a number of years, most probably starting towards the end of this decade. This is entirely consistent with the time period typically associated with such a large and complex regeneration project and aligns with the timetable in OPDC's adopted Local Plan. Neither does this preclude earlier development opportunities. OPDC already has around 5,500 homes built or under construction, with thousands more in the planning pipeline, and the award of £50m from the Mayor's Land Fund enables OPDC to seek additional early site acquisitions to bring forward new homes prior to the opening of the new HS2 station.

2. Community Engagement

Community engagement is of paramount importance to OPDC and is at the heart of our organisation's ethos and approach to planning and development. Our community engagement strategy (included at annexe c) and Statement of Community Involvement outlines how we approach engagement across our area, as well as how we expect others, including developers, to engage with local communities on planning applications.

Our engagement approaches are sophisticated and meaningful and supported by a dedicated engagement team, as well as our development and planning teams. All our plans and projects involve close communication and interaction with local residents, businesses and visitors, to build awareness about our plans for the area and the many benefits of regeneration, but also to listen to different viewpoints, particularly those whose voices sometimes go unheard, and to be open to new ideas and perspectives.

We believe we were the first to set up a Community Review Group, drawn wholly from residents and workers in the local area to formally review and comment in detail on planning applications, prior to our planning committee considering them.

Our community engagement strategy sets out a community charter (section 5), as well as key deliverables centred around developing a shared vision for a regenerated Old Oak and Park Royal, with key themes being improving local places and spaces; nurturing heritage, art and culture; promoting skills and employment; and supporting local people during construction.

In the past year, we have held numerous drop-in sessions, online engagements, fortnightly surgeries, volunteering opportunities, focus groups, statutory consultations and specialised events to listen to a wide range of voices. Attendees have included students and pupils, resident associations, local businesses, young families and those from both new and old developments. OONF and its members are invited to all of our events and receive news about our plans before the wider community.

We have worked with the OONF and Harlesden Neighbourhood Forum in designating their forums and neighbourhood areas. The Harlesden area was designated as applied for by the Forum. The designated Old Oak Neighbourhood Area was smaller than originally applied for following a detailed review of the boundary taking account of national guidance and public consultation comments. The revised boundary was considered in detail by OPDC's Planning Committee and Board prior to adoption. Full information of the process and outcomes are available on our [website](#).

As a public sector body, transparency is also very important to us. This last quarter, we reported a 100% response rate within the 20-working day time period across the numerous enquiries received, and last year, when audited on our public liaison practices, which was assessed on both the quantity and quality of our responses, we received a 'substantial' score rating.

Inclusive engagement is a priority for us, and we organise our activities carefully to ensure that we hear the full range of voices and views, including those who are often unheard or hard to reach. We have a newly adopted Equity, Diversity and Inclusion strategy, which we have prepared with a local focus group to ensure it truly reflects our diverse communities.

We are currently organising planning and co-design workshops with local people to collaboratively shape the future of Old Oak West, building on the policies set out in the Local Plan. This programme will feed into our forthcoming Old Oak West supplementary planning document and will be published in a community 'ideas book'. We welcome local groups - including OONF and the Grand Union Alliance - to provide constructive input and feedback and openly invite them to do so.

3. Park Royal, jobs and employment

Both Just Space and Professor Jennifer Robinson have provided commentary and assertions about OPDC's strategy and plans for employment, particularly in Park Royal, suggesting that our Local Plan fails to protect businesses and that our jobs target does not take into account existing businesses.

This is inaccurate. Our Local Plan has a range of policies which protect and support business and employment opportunities, including requiring any new proposals to protect, strengthen and intensify the Strategic Industrial Location (SIL) in Park Royal and Old Oak North.

We have a target for 56,000 additional jobs above current numbers. Our Plan's policies ensure that all proposals look to incorporate existing businesses within new developments or provide suitable relocation spaces, as well as including a requirement for affordable workspace, shared workspaces and/or small business units to be delivered as part of any new employment floorspace.

We are also working closely with existing businesses in Park Royal to support the local economy and help protect and grow local enterprise. We are making public realm improvements, providing grants for small businesses, funding free e-van hire, sponsoring the Park Royal Business Group and championing the creative industries through our Creative Enterprise Zone status and the Park Royal Design District. We also run a recruitment and employment brokerage service - the Forge - that works closely with local businesses, colleges and the employment service and which has placed over 160 local people into employment and training in our area.

4. Planning applications and development management

The submissions also suggest that the relationship between our planning function and delivery arm raises potential conflicts of interest between the two, and that to meet housing targets, there is undue pressure to achieve higher density, tall buildings and less social infrastructure for communities.

OPDC is both a local planning authority and a delivery body – an arrangement that is, of course, very common. Most local councils and regional authorities in the UK (including the GLA) have twin functions as a local planning authority, as well as regeneration powers and programmes. However, the plan-making and development management processes at OPDC are separated from our delivery functions through the Local Planning Authority and Delivery Agent Protocol for OPDC Staff that defines an ethical wall between two roles. In addition, our planning committee has members who are, with the sole exception of the chair, non-members of OPDC's board, and hence operate independently and in accordance with well-established guidance and requirements for planning committees.

The principal reason for establishing the OPDC was to ensure a coordinated and strategic approach to a highly complex and large-scale regeneration

programme, spanning three London boroughs. The infrastructure required to support a development on this scale requires the organisation and application of Section 106 and/or CIL payments across borough boundaries, so having a single planning authority enables better organisation, oversight and control of this.

We acknowledge that as an MDC, OPDC is both a temporary agency, that will in due course hand back its powers to the local boroughs and that we have a clear imperative to work closely with local democratic representatives. The leaders of our three boroughs are full board members, local councillors sit on our planning committee (in equal balance to independent members), and we work extremely closely with officers from all three local councils across all our programmes.

Since OPDC was created in 2015, 3,299 homes have already been completed, with a further 1,931 currently under construction, with around 8,000 more in the planning pipeline. We are proud of our record on affordable housing delivery which stands at 41% - a higher proportion than many boroughs achieve.

We have also seen major new investments into employment schemes. Planning permission has been approved for a net gain in 110,000sqm of industrial floorspace helping to provide local employment opportunities and help meet London's chronic need for more industrial space. New workspaces, retail, community and food and beverage uses have also been approved which are providing local employment and services for new and existing communities.

Public transport accessibility will be transformed by the arrival of the Old Oak Common station, but also by additional transport infrastructure enhancements, including new and improved bus, walking and cycling routes as well as upgrades to local transport connections, like Willesden Junction Station. None of this is possible without the strategic regeneration of the area.

Our Local Plan sets policies for sustainable and high-quality developments, with density and building heights that are broadly in line with other recent regeneration areas such as Elephant Park in Southwark and Kings Cross, rather than the super-high densities associated with locations like Vauxhall Nine Elms or South Quay / Wood Wharf.

We appreciate that higher density housing requires careful planning and design, and needs generous local infrastructure, active and healthy streets, green spaces and public amenities – all of which are embodied in our Local Plan. Whilst we are promoting tall buildings in parts of our area, this is not a universal approach, and the locations and proposed heights of tall buildings are set out in the Local Plan alongside proposed height ranges of lower height buildings in areas close to sensitive locations such as conservation areas. This is included in our [Tall Buildings Statement](#).

A good example of this is the approach to Scrubs Lane on our eastern boundary. The detailed Scrubs Lane Development Framework Principles provide specific recommendations for where tall buildings should be located to

mark new and improved walking, cycleways and town centre facilities including shops, offices and community amenities. These recommendations have been incorporated into our planning policies and provide a level of detail that is unusual in Local Plans. This tall building guidance is accompanied by detailed guidance on heights for buildings near to sensitive locations and for buildings facing streets and railway lines.

I trust that these comments indicate the importance that OPDC attaches to full and genuine community involvement in all that we do. Delivering a sustainable new urban district that meets the needs of both new and existing communities is going to take a great deal of effort, time and investment, but with the unprecedented level of public investment being made into HS2 and the new interchange superhub at Old Oak Common, there is a unique opportunity to shape a part of London that has long been neglected and overlooked. We firmly believe that our community engagement activities and ongoing conversations with local residents and businesses, together with our close relationship with our three boroughs, will help us to achieve a purposeful and successful vision of change for Old Oak and Park Royal.

I hope these responses are helpful and would be pleased to address any further points or queries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D Lunts', with a large, stylized initial 'D'.

David Lunts
Chief Executive Officer
Old Oak and Park Royal Development Corporation