

THE OPDC BUDGET FOR 2024/5 – WHAT IMPACT WILL HS2 CANCELLATION HAVE ON FUTURE PLANS FOR OLD OAK?

In the most recent report from OPDC CEO David Lunts to the OPDC Board (November 23rd) the OPDC response to the Government's announcements on HS2 was as set out as below:

We do not anticipate that the revised scope for HS2 should have any substantial impact on the strategic case for comprehensive regeneration at Old Oak, the adoption of the Old Oak West Supplementary Planning Document, or the Outline Business Case for Old Oak West, as the fundamental elements of the project remain as before, a view shared by the multi-agency senior steering group for the OBC which includes DfT, HS2, DLUHC, Network Rail and OPDC.

This OPDC Board meeting heard a presentation from HS2's Huw Edwards, with DfT's Alun Over (Director General responsible for HS2) contributing to the subsequent Q&A session. In summing up the discussion, OPDC Chair Liz Peace commented¹ that the HS2 changes 'do not need to effect the building of a whole new area' and that 'our enthusiasm is not diminished'.

The Budget Narrative from OPDC for the December 12th session of the Assembly's Budget and Performance Committee from OPDC is silent on the implications of the HS2 changes for the work of OPDC in 2024/5. Local residents do not share the view of HS2 and OPDC that little or nothing has changed in terms of future plans for the area around the station, now badged as 'Old Oak West'.

As people living or working the area, we have not had access to all the contextual information needed. The work of the OPDC receives relatively little scrutiny, as we pointed out in a submission to the Budget and Performance Committee (and separately to the Planning and Regeneration Committee) this time last year. So we hope the Committee will find time to pursue some lines on inquiry on the OPDC and the role that it has been undertaking since 2015.

We circulated on 17th November a further submission to B&P members, along with AM's representing the Boroughs of Ealing, Brent, and Hammersmith & Fulham. We repeated our suggestion that a formal review of OPDC is needed, following that undertaken in 2016, to meet the Mayor's statutory responsibility to review Mayoral Development Corporations 'from time to time'.

Below are the six main reasons why we feel a review is necessary. The B&P Committee on December 12th may be able to obtain answers from Liz Peace and David Lunts that provide more reassurance than local people feel at present.

- 1 This time last year David Lunts responded to a series of questions from Caroline Pidgeon AM on the OPDC's **Outline Business case to Government**, with Mr Lunts saying that '*the OBC is absolutely crucial*'. The OBC was submitted in August 2023 and favourable responses were expected in September. The OPDC Board was told on November 23rd that *The Outline Business Case for Old Oak West is proceeding well, with close engagement with colleagues in DfT, DLUHC, Network Rail, HS2 and the Infrastructure & Projects Authority, and following a number of clarifications and queries from the transport family, we anticipate an early consideration from DfT's Tier 2 investment board, possibly before the next Board meeting in January, in which case we will update members as soon as we have further news.* Assembly

¹ This Board meeting was held at a different venue than usual, prior to a site visit to the works at old Oak Common station, and hence was not recorded as would normally be the case for OPDC meetings. Members of the old Oak Neighbourhood Forum and the Grand Union Alliance attended the public part of the session.

Members may wish to pursue the likely outcome. The document has remained confidential, along with the HMT processes for its consideration.

- 2 The changes to HS2 clearly have some impact on Old Oak Common station, in that **it will remain the HS2 terminus for an indefinite period**. Decisions on a HS2 S17 application to build extra 'temporary' staff accommodation has been deferred twice. The lack of any planned road access to the eastern end of the station is a situation seen by local people, and by Hammersmith & Fulham councillors as extraordinary. Questions have been asked in the Commons by Hammersmith MP Andy Slaughter.
- 3 HS2 continues to describe Old Oak as '*Set to be the best connected and largest new railway station ever built in the UK*'. Largest it may prove to be, but **the 'best connected' case has never been evidenced**. OOC station will be the 42nd connection added to the Elizabeth Line, a decade after others around which new development is already clustering. The nearest Underground stations at Willesden Junction and North Acton are over 1km distant. A new Overground station at Old Oak Common Lane remains unfunded. Yet OPDC also continues to claim for the OPDC area '*unrivalled connectivity across London and the UK*'.
- 4 It is accepted now by OPDC and HS2 that the large parts of the biggest of the four development sites around OOC station (owned by TfL/HS2 and in use as a construction compound at Channel Gate/Atlas Wharf) **will need to remain in HS2 use until a potential HS2 terminus at Euston is completed. This takes timescales into the 2040s and possibly beyond**. The Channel Gate development site was destined to be at the heart of the new 'major town centre' envisaged in the 2022 adopted version of the OPDC Local Plan.
- 5 **Tunnelling between OOC station and Euston** also relies on the Channel Gate construction compound. The OPDC Board on 23rd November was told that this contract is 'already procured' and that the consortium involved intend to start tunnelling in 2026 regardless of whether a decision on a terminus at Euston is made by then. This suggests that either this contract must be bought out, or Government will not have the £6.5bn savings to re-allocate from withdrawing public sector funding for the OOC to Euston tunnel and terminus construction. The Mayor has already commented that securing private sector investment for the tunnel costs is 'fantasy'.
- 6 In terms of **delivery of new homes** (the focus of the 12th December B&P session) we suggest that the '*8,000-home pipeline of planning applications*' (as referred to in the OPDC Budget Narrative) needs some interrogation. The OPDC's Authority Monitoring Report² at paragraph 2.6 states ***There were no new housing starts in the 2022/23 monitoring period. Housing starts have been delayed for a number of reasons, including:***
 - *a break in the development pipeline as a result of multiple Covid-19 lockdowns,*
 - *continuing economic uncertainty and fire safety issues around single staircases in tall buildings, and*
 - *rising inflation particularly in construction costs.*To these (understandable) factors, we would add '*declining investor confidence in making a start on site*'. Our Forum monitors closely applications and consents at Old Oak West, along with the progress made on S106 conditions and on discharging pre-construction conditions.

² See at [OPDC Authority Monitoring Report 2023 \(london.gov.uk\)](https://www.london.gov.uk/press-releases/major/2023/03/opdc-authority-monitoring-report-2023)

We see it as unsurprising that developers and investors are pausing on a number of proposals which have been the subject of pre-application discussions, given the uncertainties that surround the originally predicted 'transformational' and 'catalyst' impacts of Old Oak Common station and HS2. We continue to question why a station designed primarily as an interchange will bring new demand for commercial and residential development, other than on the 'Adjacent Site' next to the station.

Our Forum members (150 residents and a few businesses) have never been opposed to regeneration at Old Oak. We see the adopted Local Plan as a document that lost spatial coherence with the withdrawal of the plans of Cargiant/LRP in 2018. The heavily modified and adopted Local Plan is now being followed by a Supplementary Planning Document that covers the rebadged area labelled 'Old Oak West' around OOC station.

We have many reservations about this Supplementary Planning Document. It seeks to 'amalgamate' Local Plan policies applicable to six previous separate 'Places' in the Local Plan, while drawing a new boundary around these as 'Old Oak West'. We have questioned whether such changes can lawfully be made through a SPD, rather than via a development plan document (requiring Examination).

As discussed by the committee last December, our confidence in OPDC's willingness to consult meaningfully has diminished since 2015. Our latest concern is that OPDC officers are refusing to publish online full copies of the responses received on this recent SPD consultation (which closed on November 27th). These representations will instead be summarised and responded to by officers in a 'consultation statement'. This 'statement' will be published at the same time as a report recommending adoption of the SPD, to the OPDC Planning Committee of January 25th and Board on January 31st 2024.

This process seems to us to be unorthodox (at the least), inexplicably hasty in its final stages, and very unhelpful to a concerned public. We wish to see (in time to comment before decisions on adoption are made) what the three 'host Boroughs' have said in *their* responses to a SPD covering part of *their* local authority area, along with views from landowners and other interested parties. Such representations should be published by OPDC.

The significance of this particular SPD was described to this committee last December by David Lunts in these terms *The other thing that is crucial now that we have the Local Plan adopted is to establish an SPD, which will provide a lot more detail about the kind of scheme that will sit underneath that overarching planning policy framework in the Local Plan.*

Finally, we feel that we need to continue to make submissions to scrutiny bodies of the Assembly, given that material such as OPDC's Budget Narrative for 2024/5 gives a partial picture. Our major fear is that OPDC's planning and delivery processes will carry on with insufficient recognition of the HS2 changes, combined with diminishing investor confidence that Old Oak West is a part of London with the transport connections and local geography needed for 'a new part of London' to emerge, with 25,000 new homes.

We hope that the next iteration of the London Plan will set revised and more realistic parameters and targets for the OPDC area. And that in the meantime an independent review of OPDC's track record to date, and future plans, is commissioned by the Mayor and undertaken.

Old Oak Neighbourhood Forum, December 2023