

Review of the Old Oak and Park Royal Development Corporation: **Summary of stakeholder views**

Background

In late June 2016 the Mayor of London asked¹ the Greater London Authority (GLA) to undertake a review of the strategic direction and work programme of the Old Oak and Park Royal Development Corporation (OPDC). This was in the context of the Mayor recognising the importance of the regeneration project to London, but also his concern to ensure the fundamentals were in place to get the best deal for Londoners and create a thriving new area of London.

To inform the review, the GLA invited and received views from a variety of stakeholders, including:

- i. local resident and community groups and networks
- ii. local elected representatives and public sector officials
- iii. representatives of the local business community
- iv. developers and others working in regeneration in the private sector

This engagement took the form of meetings and in others cases phone calls. Some representations were received via letter or email. In addition, London First hosted a breakfast with a number of developers.

This note summarises the views expressed by stakeholders. It is worth noting that while different stakeholders naturally focussed on distinct themes, the views expressed by these different parties were rarely contradictory. Where there were divergent views, these are highlighted in the summary below.

Not all of the views expressed fell within the review's [terms of reference](#). Nevertheless, they are included here for completeness and to inform business and improvement planning at OPDC.

The main themes

OPDC's role and capacity

¹ [Under Mayoral Decision 2006](#).

1. There was broad support for a Mayoral Development Corporation (MDC) at Old Oak and Park Royal. While different parties placed different emphases on different aspects of its role, there was general consensus OPDC needed to show greater leadership. A new Chair was seen as critical in achieving this.
2. Developers told the GLA that OPDC needed to be more proactive and decisive and demonstrate greater urgency. In particular, it needed to support investment at Old Oak by decluttering and bringing clarity to the utility and land issues, funding infrastructure and breaking the site up into easier to develop chunks.
3. Those with a view were somewhat critical of the land transfer agreement with government, with it variously described as “woolly” and “hasty”.
4. Most supported, and indeed saw as crucial, further government funding for regeneration at Old Oak.
5. The GLA heard divergent views as to whether OPDC’s boundary should be redrawn. Some felt Park Royal should not be within the MDC’s remit. Others felt Park Royal did need to be within its boundary so OPDC could approach and address the infrastructure and other problems there holistically. While fewer people expressed a view, the case was put to the GLA that Wormwood Scrubs should also be outside of OPDC’s ambit.

The Board

6. Residents and community groups felt the Board was not representing their views sufficiently strongly. The community, including the business community, they felt, needed stronger representation and enhanced mechanisms for getting its views across to the Board.
7. The membership of the Board was seen as disproportionately weighted to public sector officials. That had the potential also to create conflicts of interest. Many also thought the Board needed a broader range of expertise.

Infrastructure and development

8. It was widely recognised that Old Oak was a very challenging area to develop. In particular, the existing rail infrastructure was problematic. A solution needed to be found swiftly to the location of the Crossrail Depot. Over-station development at the new Old Oak HS2 station was crucial too.
9. Developers told the GLA that OPDC had an important role to play in opening up the site to support development. There was also a view that OPDC would do better to shift its focus from the south of Old Oak to the north, in the interim at least.
10. From a residents’ group, the GLA heard concerns about the quantum of homes and jobs and the impact this would have on densities, social infrastructure and therefore, ultimately, on Old Oak’s ability to integrate with the wider area and thrive.
11. Social infrastructure, amenities and culture were all seen as vital to the long-term success of the area. And there were concerns social infrastructure was already stretched. OPDC needed a clear needs assessment and a plan for delivering schools and healthcare and community centres.

12. The GLA was told consistently that affordable housing provision, across a variety of tenures, was important. There were opportunities also to explore self and part-build models and Community Land Trusts.
13. The GLA heard concerns from residents about the level of disruption and impact they would face from years of construction – of HS2 in particular. OPDC needed to be an advocate for the community to help mitigate these impacts.

Planning and community involvement

14. Some of those contributing views lacked confidence in the Planning Committee and felt it was hamstrung by its structure, with a lack of local representatives and not enough scope for community input.
15. The GLA heard concerns about an inherent tension and muddling between OPDC's role as a development agency and a planning authority: the two needed to be kept separate.
16. Community groups told the GLA that OPDC needed to do more to ensure its Statement of Community Involvement was applied consistently. It needed to actively support the involvement of local people in the planning process, including through a community planning forum.
17. Transparency of the pre-application and viability assessment processes was seen by community groups as particularly important. OPDC had an opportunity to learn from others and become 'best in class'.

Engaging with the community

18. The GLA was told OPDC needed to be proactive and consistent in engaging with the community, including hard to reach groups, and help local people navigate and understand the proposals for the area and the bureaucracies involved.
19. There were concerns about the balance of spending within OPDC's communications and engagement budget, with too much spent on promotion. More transparency was required and some of the budget should be used to directly fund community groups so as to build and maintain their capacity.

Air quality

20. A significant proportion of those the GLA talked to were concerned about environmental and especially air quality issues. OPDC needed to give more prominence to such issues, they felt.

Appendix: Write-up of stakeholder views

OPDC's role and capacity

Support for OPDC and the importance of its leadership role

- i. There was broad support for a Mayoral Development Corporation at Old Oak and Park Royal. The community, local boroughs, government departments and developers all saw OPDC as an important focal point. Some saw its value as a convenor of partners; some as a body that could remove blockages, drive development and help put in place the necessary infrastructure; others saw OPDC as a place for competing demands to be heard and brokered; and finally, for others still, the value of OPDC lay in its ability to represent coherently and robustly the views of the community. A common thread, from developer and community representatives alike, was that OPDC needed to do more to show leadership.
- ii. While there was some divergence of views on precisely what the *raison d'être* and operating model for OPDC was or should be, there was relative consistency in the view that it needed to exist in significant part due to Old Oak and Park Royal's position at the intersection of three different boroughs. Nevertheless, one borough told the GLA that OPDC needed to be constituted on a more explicitly partnership-based approach, with the local boroughs and government.
- iii. The GLA heard positive comments about aspects of OPDC's work to date from a variety of sources. But there was also a consensus that OPDC was not yet providing sufficient leadership or direction. One individual commented it was "being buffeted rather than leading" and another said it "had to date not really made its presence felt." It was, however, recognised OPDC was operating in a "difficult environment characterised by a multiplicity of ownerships and interests."
- iv. The need for OPDC to have a strong Chair able to represent its strategic interests and enhance its ability to lead was widely cited.
- v. From the development community, the GLA heard that OPDC was not moving quickly enough. There were divergent views on whether it had done sufficient work to understand the nature of the area, but certainly there was a sense it was not doing enough to "catalyse things on the ground" or "force change in the public interest." It was important OPDC exerted its influence on other players – public and private. One developer stressed the importance of a partnership rather than adversarial approach.

Land transfer agreement, funding and capacity

- vi. One borough, however, sounded a note of caution. There was seen to have been a "degree of haste to get formal planning documents and policies in place and to conclude a financial deal with government" and that had not necessarily been in the best interests of the area. There was merit, the borough said, in "more careful consideration."

- vii. Others supported this assessment of the land transfer agreement with government. One developer told the GLA it was “woolly” and weighted in favour of the needs of the transferring Whitehall departments. The developer was also concerned, and this was a concern expressed more widely, that OPDC had not secured itself a “proper resource base”.
- viii. Many exhorted government to provide more funding for the work of OPDC, including “perhaps as a post-Brexit package of public infrastructure investment” and/or through designating an Enterprise Zone and putting in place a tax increment financing regime.
- ix. Another developer told the GLA that too much emphasis on capturing value during development would prevent developers from delivering “additionality”, that is, more homes that are more affordable.
- x. Again alongside praise for aspects of OPDC’s work, the GLA heard from a cross-section of stakeholders that OPDC needed to enhance its expertise.

OPDC’s boarder

- xi. The GLA heard strong views that Park Royal should be within the MDC boundary; in particular from the Board’s business representative, who saw it as important the area was looked at holistically.
- xii. Some did, however, dissent. A contrary view was that the “challenge at Old Oak of creating a new place [was] very different from that at Park Royal” and that the “two tasks [were] too big and complex to be handled by one organisation.”
- xiii. The case was also put to the GLA that Wormwood Scrubs should not fall within OPDC’s ambit.

The Board

- i. OPDC was given credit for having a resident and a business representative on the Board. Yet many felt the Board was not representing the views of the community sufficiently strongly. For some the main problem was that there were not enough elected local representatives on the Board; for others, the Board needed more than one community and/or business representative so as to represent its views more directly; and others still felt the community and business representatives currently on the Board did not get enough support. One stakeholder summed things up by saying the Board needed “stronger local knowledge and a stronger local voice.”
- ii. A question was raised about the remit of the community representative. Did she have a duty to feed in the variety of community views that might be expressed – and if so, did she have the support to do so?
- iii. One idea expressed was for community organisations to present to the Board so that it could hear a wider variety of community views and more directly.
- iv. The membership of the Board was seen as disproportionately weighted to public sector officials and those with an interest in transport. This, the GLA heard, narrowed the expertise and views available to the Board and had the potential to lead to conflicts of

interest in future. There needed to be a broader range of expertise including of housing, health, education and the voluntary and community sector. But some expressed a note of caution that the Board was too large and needed to be slimmed down.

Infrastructure and development

Challenges

- i. Again, there was wide recognition of the development challenges posed by the site, in particular in respect of the rail infrastructure. Some in the development community felt the problems – including the Crossrail Depot and over-station development – needed to be resolved in the immediate future or would remain intractable. That would significantly impede regeneration, restricting the delivery of homes and jobs.
- ii. The GLA heard from a developer that it was in delivering the infrastructure where OPDC's support was most critical. Clarity was needed on who would pay for what. With the right infrastructure delivered early, including to open-up and connect the site, there was potential to successfully phase development – and for development to happen soon. That was particularly the case in the north of the site, and the developer thought OPDC needed to shift its focus accordingly from south to north.
- iii. One developer challenged the need for new stations at the centre and south of the scheme. Money could instead be spent on improving Willesden Junction; that would save money and could also improve reliability of the train service. From a different developer, the GLA heard that connectivity was more important than capacity.
- iv. A rail users group told the GLA planning for the new station at Old Oak Common to date had paid insufficient regard to the potential it provided to join up HS1, HS2, Crossrail and the West London Line. The station as proposed would be limited: in its connections, capacity and support for regeneration. It needed to be multi-decked and land set aside for viaducts to enhance connections. It was vital OPDC pushed for this to be the case.

Jobs, homes and social infrastructure

- v. Some community representatives held the view there was a gap between OPDC's ambitions for homes and jobs and the reality of what could be achieved; at least without recourse to excessive and detrimental height and density. Such densities would, among other things, reduce the likelihood of Old Oak integrated successfully with other areas. There was, further, an economic consideration: would the housing market be able to absorb the quantum of homes planned? The GLA heard too from a developer that market absorption would impact on the timetable and the number of homes, particularly affordable, that could be delivered.
- vi. The GLA was told consistently that affordable housing provision, across a variety of tenures, was important. So too was the need for lifetime homes and sustainable communities; some, however, did not feel this was compatible with plans for high-rises of one and two bedroom flats.
- vii. Local groups the GLA spoke to wished to see self and part-build housing models used. As it would be quicker to deliver, that would also have political benefits. Community Land Trusts were a potential option too.
- viii. There were also concerns about whether the necessary level of social infrastructure would be provided. Already there was a shortage of health and community centres and secondary schools, the GLA was told. A clear needs assessment of and plan for social

infrastructure was needed. Was provision of the necessary social infrastructure compatible with the numbers of homes and jobs targeted?

- ix. There was broad recognition from all quarters that to succeed Old Oak needed to be seen as a desirable place to live and work; a place with 'sustainable and lifetime neighbourhoods' as one person put it. Many cited the importance of good quality open space, culture – with OPDC becoming a cultural centre – and community amenities such as a lido.
- x. Among the community groups and representatives the GLA spoke to, and recognising they were not necessarily representative of the range of community views, there was no desire to see a football stadium built within or close to the OPDC area.

Impact of construction on the local community

- xi. There were concerns about the impact of construction on existing communities and surrounding OPDC, including the knock-on effect for traffic in the area, which was already congested.
- xii. The impact of HS2 construction at Wells Road and its environs had, and despite the OPDC Chief Executive supporting liaison with HS2, received less attention than at Camden. It was important OPDC and the Mayor stood up for local people and helped ensure the impact was mitigated. There was a request for someone at OPDC to be designated to support local businesses and residents with HS2 issues and to act as an intermediary.

Planning and community involvement

The Planning Committee

- i. There was a strong view expressed by resident groups that the Planning Committee should, fundamentally, represent the local, and wider, community; and that it needed to do more to meet up to that fundamental requirement. This would give it "credibility and accountability."
- ii. Some felt the Committee should be enlarged to provide a wider range of voices – in particular from the local community and local elected representatives – and so support effective scrutiny.
- iii. A break should be built into Planning Committee meetings to give members of the community an opportunity to consider questions they wished to put forward. The time available for raising objections also needed to be more generous.
- iv. Some felt the planning functions that had been delegated to Ealing should rest instead with OPDC.

Acting as a developer and planning authority

- xiv. One community network the GLA met with was concerned about a tension between OPDC's role as a development agency and a planning authority – and its potential to create conflicts. Some thought the two were muddled when they should be kept

separate, with separate teams for each. These conflicts would become greater, it was said, once OPDC was a land holder.

Community involvement

- v. Community Groups told the GLA that OPDC needed to do more to ensure its Statement of Community Involvement was applied consistently. A number of individuals expressed their dissatisfaction with the approval process for the Oaklands application in particular.
- vi. OPDC's role needed to go beyond making information about upcoming planning applications available. It needed also to offer advice and guidance to the community to enable it to respond effectively to planning applications. And it needed to facilitate discussion with developers. One idea put forward was for OPDC to set up a community planning forum at which members of the community could discuss significant schemes, seek clarification and cross-examine developers. Planning Committee Members should attend also. A submission to the review summed this up by saying "OPDC should actively seek to work in collaboration, co-creation with the community and encourage their active involvement in making policy."
- vii. But the GLA also heard positive comments about OPDC planning officers; for example, that they "were motivated, informed and committed." In particular, there was praise for the consultation on the draft Local Plan. Though others did comment there was more OPDC could do so that officers did not seem remote.
- viii. OPDC's design review group, one community group told the GLA, was not sufficiently representative of the local community. It pointed to LB Hammersmith & Fulham's model that incorporated local professionals and lay people. It needed to be made public who sat on it.

Transparency and viability

- ix. Though the importance of the broad application of transparency and openness was cited by many, it was, more narrowly, in the areas of pre-application advice and viability that its importance was particularly stressed.
- x. OPDC, it was seen, had the opportunity to learn from good practice elsewhere – Kensington and Chelsea, Greenwich and Camden borough councils were mentioned – and strive to be "best in class", making detailed information about pre-application advice and viability available.
- xi. The GLA heard a recommendation that OPDC should set out how it would provide independent assessments of developer viability studies and also what it perceived as an acceptable profit margin for developers. And it should clarify and openly discuss its own financial interests in planning applications
- xii. The same community network put forward the view that OPDC should operate an open book policy relating to pre-application advice provided to developers and public bodies. The OPDC planning team, it felt, should provide a monthly update on developers they have had pre-application discussions, as well as how its wider work was progressing.

Engaging with the community

Sharing and inviting input into a clear plan for the area with all groups

- i. It is evident there is a strong ecology of resident groups in the wider area. Yet that is not true of the core development area. Many local people, the GLA was told, were hard to reach and the majority had not commented on plans for their local area. It would take innovative approaches to engage them. But it was also about OPDC getting out there to attend events anyway taking place. It was important OPDC increased its local presence.
- ii. The variety of proposals, studies, schemes, document and plans for or about Old Oak, produced by a range of parties, meant for a confused picture. Again, there was a gap between what these envisioned and what was likely to actually happen.

Consistency and quality of engagement

- iii. Again, there were positive comments about aspects of OPDC's engagement with the community. The consistency and depth of that engagement was, however, at times questioned. Also, there were occasions where, for example with the consultation on Wormwood Scrubs, greater expertise needed to be brought to bear to design research.
- iv. One individual cited a commitment from the then Mayor's Team to create and implement a community charter. This, he said, had not been followed through.
- v. A landowner, who said he had only been invited to one landowner meeting, told the GLA there was a need for more structured engagement.

Funding for engagement and community groups

- vi. We heard views that some of OPDC's budget for communication and engagement should be allocated to directly support community and network groups. Alternatively more funding could come from the boroughs.
- vii. There was not presently sufficient transparency about how the communication and engagement budget was spent and a perception too big a proportion was spent on promotion.
- viii. There was perceived by some local people to be an asymmetry between the relationship OPDC had with developers and with the community. There needed to be at the least parity of access. Given the greater level of resources available to developers, that in turn implied actively supporting the local community – including in responding to planning applications.

Other themes

Air quality and other liveability factors

- i. The GLA heard views that air quality had not to date received sufficient prominence in OPDC's policies, including the Local Plan. There were concerns too about the environmental impacts of the Powerday and European Metal Recycling and other waste processing plants. One resident's group felt the "resumption of a 'partnership' between Powerday, as Old Oak's redevelopment and future energy supplier" was "inappropriate". It also stressed the importance of local monitoring of pollution levels
- ii. Protecting and enhancing the Grand Union Canal needed to be a priority for OPDC, one group told the GLA. But it could also, if sensitively handled, ease the traffic and disruption years of construction could lead to.

Park Royal

- iii. The Board's business representative pointed to significant problems for businesses in Park Royal including poor broadband and congested local roads. And he said OPDC had brought focus to bear on these problems. Yet it was Old Oak centric at the expense of Park Royal.

- iv. The importance of protecting industrial use at Park Royal was recognised. But the GLA also hear the view that mixed use was a viable option that would not impact unduly on the quantum of industrial space.