

# Grand Union Alliance

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## OPDC Review - meeting with Fiona Fletcher Smith 15.09.16

Key issues that GUA members would like the Mayor's office to consider

### 1. Targets for Old Oak

- These are, to say the least, very challenging and seemingly can only be delivered in ways that are alien and injurious to existing and surrounding areas, residents, businesses and services.
- This is evident in proposals being brought forward and their expressions in development scale, density, form, height, massing, design, layout, amenity and mix, including the likely levels of genuinely affordable homes of a range and type needed by most Londoners and their failure to satisfactorily relate and integrate with existing and surrounding neighbourhoods for the benefit of all Londoners.
- The evidence base for the targets of 24,000 new homes and 55,000 new jobs in the Old Oak Opportunity Area is weak. A new evidence base that looks sensitively at development targets that support the creation of sustainable and lifetime neighbourhoods and that integrate properly with surrounding communities is required.
- A solid evidence base relating to the need for social and community infrastructure and green, play and youth spaces high priority for existing communities and new is required. Satisfying these needs are high priorities for both existing communities, which experience high levels of disadvantage and deprivation, and new communities if these are to be sustainable life time neighbourhoods. Of concern is the likelihood that new developments will overstretch existing services and amenities, if sufficient provision of an appropriate nature and scale is not made when housing developments are brought forward.
- Assurances need to be given that there will be adequate funding for the project (including substantial infrastructure) and that this is not to be provided at the expense of affordable housing and social and community infrastructure.
- A detailed study on how construction and new developments will impact on existing communities in and surrounding the OPDC is required - with detail on how this will be managed.

### 2. Structure and function of the OPDC planning committee

GUA members need to be assured that the committee is carrying out fully its function as independent quasi-judicial body on behalf of the community it represents and is of a size and composition that support its procedural and probity rules. This is particularly important in the case of a Mayoral Development Corporation which is acting both as development agency and a local planning authority. The necessary lines of demarcation in function and responsibility between officers promoting policy and development, and those responsible for development management are not explicitly clear. In practice officers can perform both tasks. To address these issues -

- There should be separate teams of officers dealing with (i) with policy and development and (ii) with development management.
- The OPDC should operate an open book policy relating to pre-application advice provided to developers as well as to public bodies such as national rail and TFL. Details of the negotiations around viability of schemes should be made available

(particularly for affordable housing proposals, social infrastructure, green infrastructure and open spaces, local transport, and draft heads of terms of Section 106 agreements).

- The OPDC should organise a Planning Forum for significant development proposals (mentioned on page 20 of the OPDC SCI) to enable local residents, community groups, small businesses, to consider developer proposals and how schemes might be improved. Councillors and other planning committee members should be able to attend to hear and understand local concerns and proposed changes.
- The planning committee could be enlarged (currently with 7 members) to provide more space for elected representatives and at least one community representative. Note that the LLDC planning committee has 11 members.
- There should be separate teams of officers dealing with (i) with policy and development and (ii) with development management.

### **3. Community Involvement**

- The OPDC must ensure that the Statement of Community Involvement is applied as approved. (This was not the case with regard to the Oaklands / Genesis)
- The OPDC and planning applicants should constantly highlight the importance of the community being involved in development of planning policy, development plans and determining planning applications.
- The OPDC should actively seek to work in collaboration, co-creation and proactive involvement of the community in developing planning policy.
- To ensure that involvement is effective and has impact, appropriate monitoring, including some that is long term, of the opinions and experiences of groups from the community would help support this.
- A range of options should be provided for community consultations and reasons should also be provided for rejecting any supported by the community. The Regulation 18 consultation was very weak on options and contained none that had been developed in collaboration with the community. Developer consultations could / should always offer options.
- Community groups should be involved in developing the content of section 106 agreements and a public record of section 106 agreements should be provided on the OPDC website.
- The OPDC should set out good practice guidance around accommodating community members who have responded in writing and / or who wish to present at the Planning Committee. This should include:
  - (i) development of Planning Forums for significant development proposals
  - (ii) (having a community representative on the planning committee;
  - (iii) a clear schedule within the officer report for all the representations/objections made with in the application process and their response and reasons where appropriate to dismissing them; and
  - (iv) more generous time for objections to be raised at the committee meeting – particularly for large scale development proposals.

### **4. Transparency and confidentiality**

- There could be a lot more openness around 'viability' and what specifically this means in the OPDC area. More accurate information will enhance community members' ability to comment effectively on options for developments.

- In the instance of the Oaklands / Genesis development the Mayor's office has allocated funding to increase the amount of 'affordable' housing (shared ownership housing); this did not form part of the public consultation.
- In addition, decisions concerning density, height and provision of green/open space are informed by "viability" assessments. In order to effectively comment on and influence planning decisions, early public access to information on these details is essential.
- There needs to be far greater transparency around the OPDC's input into the shape of the development proposals.
- The OPDC should provide advice and guidance to community members on how to effectively respond to planning applications (or provide grant funding to support this).
- The OPDC should set out how it will provide independent assessments of developer viability assessments and what it perceives is an acceptable profit margin for developers. It should also clarify and openly discuss its own financial interests in planning applications, notably the ways in which the Development Infrastructure Financing requirements for the OPDC development as a whole and the application and use of CIL charges influence advice and decisions on individual applications.
- The OPDC planning team should provide a monthly update on developers they have had pre application discussions with and work that is being carried out on the development of the OPDC Local Plan and evidence based documents.

#### **5. Community relationships with the board (this could be stronger)**

- Community organisations including the GUA, Neighbourhood Forums and groups involved in supporting existing community members to access jobs (for example) could be invited to give presentations to the board – in the same way that developers are invited to deliver presentations.
- One community board member is not enough.
- Is the remit of the existing community board member the same as that of other board members? Are there expectations that she has a remit to feed in a wide variety of community views and if so what kind of support is needed / does the OPDC provide to support her do this.
- There should be a higher percentage of elected board members than at present (but with a hope that particularly elected members would formalise ways of relating to the communities they represent in respect of the OPDC decision-making)
- There could be better representation of people with expertise around housing, health, education and the voluntary & community sector on the board.
- An accessible summary of the board minutes could be provided on the OPDC website (this is something that the GUA has requested in the past).

#### **6. Funding to support grassroots engagement**

- Given that a budget of £522,000 for 2016-17 and £572,000 for 2017-18 was agreed for the OPDC's communications and engagement work (almost double the amount to be spent on delivery of the OPDC socio-economic strategy - £600,000 for two years – some of this should be allocated to support empowerment of local community groups.
- There should be a detailed breakdown of both communication and engagement elements of the budget including setting out separate amounts spent on grass

roots / community and voluntary sector; large and smaller businesses and local authorities' engagement / involvement.

- There are existing community groups and networks that support engagement / involvement of community members in the development of planning policy (including the GUA and its individual members). It would be good if some of the communications and engagement budget could be allocated to these groups and network of groups (perhaps through grant funding).
- In addition some resident and community groups would like OPDC officer support for their own efforts to engage their members in the development of OPDC planning policy and in dealing with the large transport projects.
- It would be good if a section of the budget was used to support the longer term sustainability of some of the existing groups and networks – particularly where there is intent to provide cross borough support and thus where individual boroughs may not feel they have a remit to support.
- Alternatively the Mayor could encourage the boroughs to provide some funding to support cross borough engagement of community groups – particularly where they already exist.