

Department of Geography
University College London
26 Bedford Way
London
WC1H 0AP
6 December 2022

To: London Assembly, Budget and Performance Committee

Re: OPDC Budget and Performance Agenda Item 7 December

I am writing on the occasion of your review of the OPDC budget and performance in your meeting on 7 December 2022. Your oversight role is a crucial public function, and I am pleased to present to you with some comments for your reflection on this occasion.

I am a senior Professor at UCL, with long term interests and an international leading profile in Urban Studies. I have undertaken a major ESRC-funded research project on urban development plans in the Old Oak area since 2013. Our research compared this to urban developments in Shanghai and Johannesburg. We were able to interview numerous OPDC and GLA officials, private developers, and local community members, and to attend and follow many public events.

One of our major research findings concerns **the detrimental impacts on the built environment of financing a major development entirely from planning gain (S106 or CIL) proceeds**. The ambition (we might say, hubris) of a Development Corporation, without financial support for the onerous infrastructure requirements of this challenging site, means that increasing density, height and limiting the provision of affordable housing and social infrastructure are the only way to fund the onerous infrastructure needs of this development. These have been estimated at £1.5bn, plus additional land acquisition (including CPO) costs if land development is to proceed, estimated during the 2019 Local Plan hearings at £1bn. Funding this from S106/CIL means that planning officers are pushing **developments which will leave a very poor built environment legacy for our city**. There is corner-cutting on complying with the London Plan policy, for example on play space (often locating this on rooftops of tall buildings) and open space, and limited investment in the social needs of existing and future local communities; 'affordable housing' is focussed on high end 'shared ownership', with social housing or London Affordable Rent only around 10% of the housing provision. Located in some of the poorest boroughs in the GLA area, this should alert concerns regarding Equalities impacts of the OPDC budget.

The Planning Inspector identified this detrimental use of the built environment to pay for the ambitious scale of development as a key issue in his deliberations on the OPDC Local Plan, but suggested that he was satisfied that a Development Corporation would secure the additional external investment required. This, however, has not transpired, for two reasons. The first is familiar to this committee, which exposed the OPDC's dissimulation around the planned CPO of developer land in the 2018 HIF bid, based on a secretive Masterplanning process, which led to the

complete collapse of the OPDC's relationship with the major private developer in the core development area to the north of the planned HS2 station. Development plans from a willing and experienced developer were at an advanced stage. The negotiations were handled very badly, leading to a landmark ruling from the Planning Inspector that development of the Car Giant site was unviable because of the profitability of the existing business and the costs of relocating to new industrial land in the vicinity. This was a major lost opportunity and a significant waste of public funds.

The second reason that neither land assets nor financial investment has materialised for the OPDC is carefully explained in the letter submitted to yourselves by Mr Henry Peterson, advisor to the Old Oak Neighbourhood Forum (he was former Chief Officer at LB Hammersmith & Fulham, with earlier roles in regeneration after training as an architect at Cambridge University). **The central government departments who own land in Old Oak West, being used for HS2 construction and currently earmarked as the main development opportunities in the OPDC, are motivated by their own commercial interests in this land.** They see the OPDC as only one amongst many possible market opportunities for developing the land (see the FOI response at the end of Mr Peterson's submission). No agreement on this has yet been reached, despite seven years of negotiations, and my view is that it would be highly risky to assume this would transpire.

I note the planned substantial budget input for further planning work on these sites – **"Vision and masterplanning: Prepare and adopt a Supplementary Planning Document for Old Oak West to define the Old Oak West scheme, including design character, green space, sustainability, utilities, amenities and public realm"** (Draft Narrative budget 2023/4, 8.7). This seems at odds with the lack of certainty as to who will benefit from and direct the development. In the absence of security about the future availability of this land, it is not clear why this expensive work should proceed. Also, significant sums are envisaged for land acquisition. Efforts to avert a repeat of the HIF scandal might be advisable.

I finally point to one additional planning matter which should be of concern to your committee's review of OPDC performance, including Equalities impacts of the budget. OPDC targets aim to generate 56,000 "new" jobs in the OPDC area (Draft Narrative budget 2023/4, 8.8). We note from the OPDC's own local plan that **"the OPDC area is currently home to 1,700 businesses, employing 43,100 workers across a range of employment sectors and skills levels"**. A target of "new" jobs, rather than "additional" jobs, together with a motivated programme of industrial regeneration, poses a material threat to the existing enterprises and "diverse and inclusive workforce" in this Strategic Industrial area (Draft Narrative budget 2023/4, 8.17). It could be construed that this is not in line with the Mayor's London Plan commitments to "good growth".

On these grounds, I do suggest that this committee might consider calling for a full and detailed review of the OPDC (not conducted since 2016). Further reasons for this have been put forward by local residents' groups. **I strongly recommend to committee members to read closely the submissions to yourselves from Mr Henry Peterson, advisor to the Old Oak Neighbourhood Forum, and from Dr Michael Edwards, on behalf of the London-wide Just Space network,** which sustains close links with the OPDC based community network, the Grand Union Alliance.

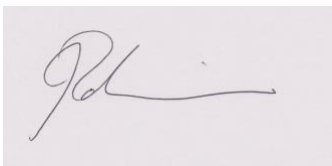
In this regard, and based on our academic research, I would like to counter a recent assertion by a senior GLA and OPDC official before the Planning and Regeneration Committee that local

community groups engaging the OPDC in policy development and planning applications are operating from a NIMBY perspective. This comment does not match up to the OPDC's stated commitments to community engagement, or to the actual activities of these groups. One of our (short) research publications (attached to this email; all our publications are available [here](#)), explains this: **community members from Old Oak Neighbourhood Forum, the Harlesden Neighbourhood Form and the wider network across the OPDC area, the Grand Union Alliance, have engaged tirelessly and in good faith over many years to comment on and enhance OPDC plans** and to alert public representatives, such as yourselves, to some of the matters of concern. In my view, in doing so the community groups in the area have adopted a highly pragmatic approach to this huge development which is taking place in their boroughs and neighbourhoods. Their direct personal interest in a development slated to materialise only over the next 20-30 years is limited - although some residents have seen their homes rendered valueless by the HS2 development which is the catalyst from which OPDC benefits enormously. Our Chinese research partners were astonished that there was no compensation for these impacts, or any "sharing of benefits" from the development. In this regard, restricting Neighbourhood Forum designation to the very small area of existing residential settlements has placed strong limits on statutory provisions for community involvement in decisions about how development impacts are mitigated and benefits fairly distributed.

Our findings are that community concerns for a development of this scale are largely of a public interest nature - with the kind of city we are building for future residents of the OPDC area, for future generations of Londoners, for our children. The OPDC commitments to community engagement ought to see a stronger and more facilitative approach to these groups, which represent a wide range of diverse residents, amenities, and social concerns in the area. It is my view that their detailed reflections and dedicated documentation of the activities and impacts of the OPDC warrant your careful attention.

Thank you for your work on this important matter. Please be assured, I am happy to provide any further detail and input that you might find helpful.

Yours sincerely

A handwritten signature in black ink on a light grey rectangular background. The signature is cursive and appears to read 'JR' followed by a long horizontal stroke.

Prof Jennifer Robinson

Professor of Human Geography

<https://www.geog.ucl.ac.uk/people/academic-staff/jennifer-robinson>