



Old Oak and Park Royal
Development Corporation

Housing Delivery Test Action Plan 2024

MAYOR OF LONDON

Old Oak and Park Royal Development Corporation

Housing Delivery Test Action Plan June 2024

1.0 Introduction

- 1.1 The Housing Delivery Test (HDT) is an annual measurement of housing delivery in the area of plan-making authorities (non-metropolitan boroughs, metropolitan boroughs, London boroughs and development corporations with plan-making and decision-taking powers) introduced by the Government in 2018.
- 1.2 The result of the HDT is a percentage measurement of the number of net homes delivered against the number of homes required (the 'housing target') over a rolling three-year period.
- 1.3 From the day following publication of the HDT, where delivery of housing has fallen below the housing requirement, certain policies set out in the National Planning Policy Framework (NPPF) apply. These policies require:
- publication of an action plan if housing delivery falls below 95%;
 - a 20% buffer on the Local Planning authority's 5 year land supply if housing delivery falls below 85% (in effect this requires an authority to find sites for an additional 20% of the housing requirement) unless the planning authority has an up-to-date adopted Local Plan with 5 year housing supply; and
 - application of the 'Presumption in Favour of Sustainable Development' if housing delivery falls below 75%.
- 1.4 Following adoption of the Local Plan in June 2022, OPDC received its first HDT measurement in December 2023 covering the period from 2019/20 to 2020/21. Between 2019/20 and 2020/21, OPDC had a target of 2,562 new homes to be built. 1,612 new homes were delivered. Therefore, the HDT measurement for the period of 2019/20 to 2021/22 was 63%, as set out in Figure 1.4 below. According to the NPPF this means that OPDC must produce an action plan.

Figure 1.4: Housing Delivery Test Measurement 2022

2019-20	2020-21	2021-22	Total number of homes required	2019-20	2020-21	2021-22	Total number of homes delivered	Housing Delivery Test 2022 measurement
908	661	993	2,562	119	416	1,077	1,612	63%

- 1.5 The HDT applies to OPDC even though the Old Oak and Park Royal area is defined in the London Plan 2021 as being an Opportunity Area with a long-term regeneration programme to deliver a minimum of 25,500 homes through significant infrastructure investment.
- 1.6 The HDT is an assessment of recent housing delivery against targets. It does not consider how an Opportunity Area will deliver thousands of new homes and meet housing targets through long-term regeneration and investment in significant infrastructure. OPDC is unlike many other local planning authorities which have a far wider range of sites from which to deliver housing over the short-term and without significant infrastructure investment.
- 1.7 Many of OPDC's development sites are linked to the construction of the Old Oak Common HS2, Elizabeth Line and National Rail Station. These sites will only come forward for housing when they are no longer needed for station construction purposes.
- 1.8 This action plan identifies the main issues that have affected delivery rates in OPDC and sets out a series of actions that the planning authority is, or will be, undertaking to try to address them and boost housing delivery and meet housing delivery targets over the medium term.

2.0 About OPDC

- 2.1 The Old Oak and Park Royal Development Corporation (OPDC) is a Mayoral Development Corporation (MDC), established by the Mayor of London in 2015 to secure the regeneration of the Old Oak Opportunity area, spanning land in three London boroughs – Ealing, Brent and Hammersmith and Fulham.
- 2.2 The area includes the Park Royal industrial estate, the Old Oak development area around the new High Speed 2 Old Oak Common Station and protected land at Wormwood Scrubs.
- 2.3 The OPDC has a number of key aims, including:
 - transforming one of London's most inaccessible areas into a well-connected, world-class transport interchange;
 - enabling delivery of new housing and commercial development, surrounded by sustainable and thriving neighbourhoods and valued open space;
 - protecting, strengthening and intensifying Park Royal and Old Oak; and
 - protecting and improving Wormwood Scrubs.
- 2.4 The OPDC area is set to be transformed with the opening of Old Oak Common Station, which will connect Elizabeth Line and National Rail services to the newly built High Speed 2 (HS2) line. The station will be nearly the size

of Waterloo, accommodating approximately 250,000 passengers a day and putting Old Oak within 10 minutes journey time of London Heathrow, the City and the West End and 38 minutes of Birmingham.

- 2.5 Catalysed by this new station, the OPDC area can play a significant role in supporting good growth in London through the delivery of a new commercial centre, a new major town centre, new high density residential neighbourhoods, protecting and enhancing the Park Royal and Old Oak North Strategic Industrial Location and providing a full range of supporting ancillary uses.
- 2.6 As a new planning authority OPDC has made a good start in delivering much needed new homes for London. Figure 2.6 provides a snapshot of development activity in the OPDC area since inception. More than 4,300 homes have been delivered in the OPDC area since OPDC's inception in 2015. However, the HDT has only accounted for housing delivery since 2019/20 when OPDC's Local Plan and housing targets were adopted.

Figure 2.6: Development activity at 31 March 2024

All homes completed since OPDC's inception	4,307
Homes started on-site	1,530
Permission granted (not started)	3,418
Resolution to grant permission	0
Submitted Apps, Pre-Apps or Developer Discussions	2,904
Total	7,852

- 2.7 Many of OPDC's development sites are linked to the construction of the Old Oak Common HS2 Station and will only come forward for housing when they are no longer needed for station construction purposes. However, OPDC has enough homes started on sites, planning permissions in the system and active discussions with developers to meet its housing targets over the next five years. Further details are contained in section 8.

3.0 OPDC Local Plan

- 3.1 The scale of development envisaged represents one of the UK's largest regeneration projects, the Old Oak and Park Royal Opportunity Area is identified in the London Plan 2021 as being capable of delivering a minimum 25,500 homes and 65,000 jobs and with the potential for development to generate an additional £7.6 billion per annum of gross value added to the UK economy.

- 3.2 OPDC's Local Plan was adopted in June 2022. The Local Plan focuses development around the planned Old Oak Common Station to create a lively and inclusive urban district with thousands of new and affordable homes, a wide range of job opportunities for local people, new public green space and community facilities.
- 3.3 The Plan sets out how the Mayor of London and OPDC will maximise the benefits of the unrivalled connectivity created by the Oak Common Station, the only place where High Speed 2, Great Western mainline services and the newly opened Elizabeth Line will connect.
- 3.4 It supports the Mayor of London's commitments to net zero, healthy living and inclusivity for Londoners, with a wide range of policies to guide new development, including exemplary standards of environmental and social sustainability.
- 3.5 Policies include a strategic target for 50 per cent of all new homes to be affordable, 30 per cent of the area to be public open space and new, high-quality jobs to be created across a range of sectors.
- 3.6 There is a legal requirement for all policies in local plans and spatial development strategies to be reviewed at least once every five years to assess whether they need updating, and to then update them as necessary. The assessment should include consideration of changes to local circumstances and national policy.
- 3.7 In addition to the Local Plan OPDC has adopted five Supplementary Planning Documents (SPD) to guide development. These are set out in Figure 3.7.

Figure 3.7: Supplementary Planning Documents

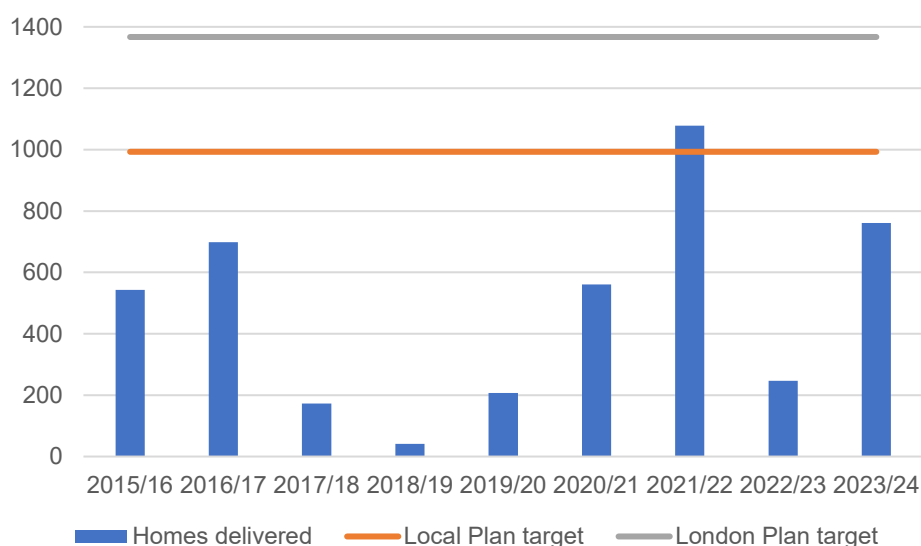
SPD Title	Purpose	Adoption date
Waste Management in High Density Development SPD	Guidance on how to manage waste in tall buildings to meet Mayoral municipal waste recycling targets	June 2022
Passive Energy Performance, Daylight and Overheating in High Density Development SPD	Guidance on how to meet energy, daylight, and overheating standards in tall buildings to conform with Mayoral requirements.	June 2022
Industrial SPD	Guidance on how deliver best practice industrial developments from a design, placemaking and sustainability perspective.	November 2023
Old Oak West SPD	Guidance to shape the future of Old Oak West reflecting Local Plan	February 2024

SPD Title	Purpose	Adoption date
	policies and community aspirations.	
Revised Planning Obligations SPD	Guidance on negotiating section 106 agreements relating to planning applications within the OPDC area.	February 2024

4.0 Housing delivery in OPDC

- 4.1 Policy H1 in the Local Plan 2022 sets out that OPDC will support the delivery of 19,850 new homes during the Plan period (2018 to 2038) and a minimum annual housing target of 993 homes. The London Plan 2021 sets OPDC a 10-year target to deliver 13,670 homes between 2019 and 2019, equating to 1,367 homes per year.
- 4.2 The Figure 4.2 shows housing delivery within the OPDC area since inception against the annual Local Plan target of 993 homes and the London Plan target of 1,367 homes. Only in 2021/22 did OPDC exceed its Local Plan annual target. OPDC has not met its London Plan target in any year so far. This action plan analyses the reasons behind under delivery and sets out that over the medium term OPDC can meet its overall housing targets.

Figure 4.2: Housing delivery since 2015



- 4.3 However, as set out in Figure 4.3 below, OPDC has approved 7,789 homes since inception in 2015. In the latest monitoring year, 2023/24, OPDC has approved more than 2,700 homes. This demonstrates a healthy pipeline of homes that will be delivered over the medium term and meet OPDC's overall housing targets.

Figure 4.3: Overall development activity since 2015

Homes approved	7,789
Homes Completed	4,307
Homes Started	1,530

4.4 The Figure 4.4 shows the homes that have been delivered on sites through planning applications determined since OPDC's inception in 2015. It also sets out the percentage of affordable homes delivered on each site by habitable room.

Figure 4.4: Homes delivered on schemes determined since 2015

Scheme	Determination date	Completion date	Number of homes	% affordable housing
Oaklands	27/07/2017	01/09/2021	605	40%
First Central	14/11/2017	31/03/2023	807	40%
Holbrook House	14/02/2017	01/09/2019	199	n/a
6 Portal Way	05/06/2020	31/03/2023	604	35%
140 Wales Farm Road	07/12/2017	01/09/2020	326	35%
Land East of Victoria Centre	23/07/2019	01/08/2021	105	100%
6 Portal Way	09/12/2020	31/03/2023	97	35%
80 Goodhall Street	09/09/2020	01/04/2023	38	35%
Perfume Factory North (Part)	10/08/2021	31/02/2024	60	100%
Total			2,781	

4.5 It is useful to understand the common themes that have ensured that these homes have been built out in a timely manner. All but one scheme (Holbrook House, a student housing scheme) were for mixed-use conventional residential redevelopment with policy compliant levels of affordable housing. All the schemes were delivered by willing private developers and in some cases in partnership with registered providers of social housing. All the schemes were on brownfield sites that could be developed independently and were not reliant on major infrastructure delivery before the homes could be built out.

4.6 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.
- 4.7 The outbreak of Covid-19 in 2020 saw a sharp shock to the housing market and had a significant initial impact on construction leading to delays in the delivery of new build homes. However, the housebuilding industry picked up towards the end of 2020 as housebuilders showed resilience and adaptability in response to the challenges of the pandemic.
- 4.8 The Department for Levelling Up, Housing and Communities (DLUHC) confirmed in July 2023 that all new buildings over 18 metres will need to have a second staircase, for two means of escape and access in the event of an emergency. This has resulted in developers having to amend their schemes which has delayed schemes from getting planning approval, Section 106 agreements signed and starting delivery on site.
- 4.9 There have been significant economic challenges that have impacted on the housebuilding industry. The war in Ukraine, rising energy costs, uncertainty created by changes in the government's economic policy and economic instability caused UK inflation which reached 11% in October 2022. This resulted in increased construction and labour costs impacting on the deliverability of schemes in the pipeline.
- 4.10 Despite these challenging circumstances there are 1,530 new homes currently under construction in the OPDC area. As set out in Figure 4.10 these homes are expected to complete in 2024/25 or 2025/26.

Figure 4.10: homes currently under construction

Scheme	Determination date	Number of homes	% Affordable housing	Expected Completion year
104-108 Scrubs Lane	30/01/2020	241	35%	2024/25
The Perfume Factory (North) (part)	10/08/2021	316	35%	2024/25
Land to the North of Central Middlesex Hospital	22/12/2021	158	100%	2024/25
115-129a Scrubs Lane	01/07/2021	208	35%	2025/26
The Castle Hotel	03/05/2023	257	Payment in lieu (Co-	2024/25

Scheme	Determination date	Number of homes	% Affordable housing	Expected Completion year
			living scheme)	
The Portal at Wales Farm Road & Portal Way	20/10/2023	350	35%	2025/26
Total		1,530		

4.11 There are currently 3,418 homes with planning approvals that have not yet started on site. Figure 4.11 provides a progress update on these planning approvals.

Table 4.11: homes with planning permission not yet started

Scheme	Determination date	Number of homes approved	% Affordable housing	Progress update
2 Portal Way	23/12/2021	380	35%	Still implementable
4 Portal Way, North Acton	13/08/2021	702	35%	New pre-app with developer for revised scheme with 667 units
1 Portal Way	28/03/2024	1538	35%	First phase completion from 2028
Land at Atlas Wharf	21/12/2023	457	36%	Still implementable
Mitre Wharf, 131, Scrubs Lane	15/03/2023	147	28%	Non-material amendment currently being considered
3 School Road	28/03/2024	176	35%	Still implementable
Small sites	Various	18	-	Still implementable
Total		3,418		

4.10 None of these permitted schemes are currently considered stalled. These homes are expected to be delivered in the future and help to meet OPDC's housing targets. They either have extended implementation periods or the landowners and or developers are working to revise the schemes, submit new planning applications before they are built out.

5.0 OPDC Planning service

- 5.1 OPDC's Development Management service is a high performing service and works positively with planning applicants and developers to secure high quality development that meets the aims and ambitions of the development plan and improves the economic, social and environmental conditions of the area.
- 5.2 The service offers professional pre-application advice to applicants to help to speed up the process of getting planning permission and improve the likelihood of applications being approved by identifying any changes necessary to ensure compliance with relevant planning policies.
- 5.3 When planning permissions are determined the service works efficiently to ensure that pre-commencement conditions are discharged so that work can start on site.

6.0 Key issues and challenges

- 6.1 The London Plan sets ambitious housing targets for OPDC. Whilst OPDC's evidence indicates that there are sufficient sites available to achieve the targets, the achievement of the targets will still be a significant challenge. The amount and rate of housebuilding needs to substantially increase. It is therefore important to be proactive in and thinking about, understanding and managing potential risks to future housing supply.
- 6.2 The vast majority of new development in OPDC's area takes place on large-scale brownfield sites that are already in some form of use. Developing a brownfield site generally means that the initial site preparation stage of a development will take longer as existing uses may need to be moved to an alternative site/or a different part of the site to enable preparation works including partial/full demolition of buildings to take place before the new homes can be delivered.
- 6.3 There are also issues where larger development sites are in multiple ownerships or there are small pieces of land blocking a larger comprehensive development proposal from coming forward. OPDC adopted the Old Oak West Supplementary Planning Document (SPD) in 2023 to support the comprehensive and coordinated redevelopment of large public sector owned development sites that are currently in use as HS2 construction sites for the new Old Oak Common Station together with several adjacent privately owned sites. Comprehensive redevelopment of these sites will deliver over 6,900 new homes and make a significant contribution to meeting OPDC's housing targets.
- 6.4 Furthermore, there are significant strategic infrastructure requirements to support the comprehensive redevelopment and development capacity of the

OPDC area. Current estimates set out in OPDC's Infrastructure Delivery Plan (2021) are that the unfunded infrastructure costs are £347m. OPDC has adopted a Community Infrastructure Levy (CIL) Charging Schedule to partially fund these costs but there will also be a requirement for external funding sources. Timely delivery of infrastructure will help to unlock housing delivery.

- 6.5 These and other challenges to housing delivery in the OPDC are highlighted in Figure 6.5.

Figure 6.5: challenges to housing delivery in OPDC

Issue	Challenge
Land supply	<ul style="list-style-type: none"> • The majority of OPDC's housing land supply comes from large brownfield sites with multiple private sector and public sector land ownerships. • Some sites are being used as HS2 construction sites and will be released until HS2 construction is completed. • There are limited opportunities for small sites which could potentially be built out more quickly. • Large parts of OPDC's area are Strategic Industrial Location and Metropolitan Open Land constraining wider land supply beyond the sites allocated for housing in the local Plan 2022.
Site specific issues	<p>There are a variety of issues that affect build out rates such as:</p> <ul style="list-style-type: none"> • High construction costs • Legal issues (e.g.: lease issues, covenants) • Complex land ownerships • Land contamination • Heritage constraints • Reliance on other developments to come forward • Infrastructure requirements.
Landowner/developer circumstances	<p>Issues that can affect the build out rate of homes include:</p> <ul style="list-style-type: none"> • Access to finance and cost of interest payments • Extent of motivation for landowner to develop their land • Market absorption rates.
Stalled sites	<p>Stalled sites can be caused by client side, contractor side, or third party (such as a local authority) issues and delays. By far the largest cause is financial, where either the client or contractor is unable to secure sufficient finance at the right time.</p>
Macro-economics	<p>Costs of construction have increased and there are shortages of labour and materials causing delays to housing development.</p>

Issue	Challenge
Delivering affordable housing	Private developers can have difficulty finding housing associations to work with.
Viability and deliverability	The viability of residential development is currently challenging and on certain types of development. This is primarily a function of development values and the housing market rather than being a result of policy burdens or developer contributions required.
Housing types and meeting housing need	Anecdotally the most viable housing types currently are student housing and co-living. While these might be build out more quickly and help to meet London-wide needs they are less likely to meet locally identified need for genuinely affordable homes and family housing.
Community perceptions	Residents are concerned about building height and in some cases reluctant to accept buildings any taller than the existing built form.
Political	National planning and Building Regulations reforms causing uncertainty.

7.0 Action Plan

7.1 OPDC is committed to maximising the delivery of housing and meeting its housing targets. Having had regard to the challenges highlighted in section 5 the following actions are set out in Figure 7.1.

Figure 7.1: Action Plan

	Action	Challenge addressed	Commentary	Timescale	Method of monitoring
1	Delivery of new OPDC Local Plan	Land supply, delivering affordable housing, Site specific issues, landowner/developer circumstances, viability, and deliverability	OPDC is starting to work on the evidence base for a review of the Local Plan, including looking at land supply and development capacities and working with the Greater London Authority on a new Strategic Housing Land Availability Assessment for the new London Plan.	0 to 5 years	Authority Monitoring Report, Local Development Scheme
2	Support delivery of key sites by proactive engagement with developers and landowners	Site specific issues, landowner/developer circumstances, stalled sites, macro-economics, viability, and deliverability	OPDC is in pro-active pre application discussions on several sites.	On-going	Authority Monitoring Report, site delivery

	Action	Challenge addressed	Commentary	Timescale	Method of monitoring
3	Implement planning permissions	Site specific issues, landowner/developer circumstances, stalled sites, macro-economics, viability, and deliverability	OPDC has taken a proactive approach on non-implemented planning permissions by contacting applicants. Pre-commencement conditions can result in the delay to implementation, and the reduction or simplification could potentially speed up the delivery of new homes. Another issue for some schemes is the time taken to discharge planning conditions. However, there are not considered to be significant planning barriers to the overall delivery of development	On-going	Authority Monitoring Report, site delivery
4	Support the delivery of new homes on small sites	Land supply, site specific issues, landowner/developer circumstances	OPDC's small sites target in the London Plan 2021 is relatively small at 60 homes as most sites are large-scale.	On-going	Authority Monitoring Report, site delivery

	Action	Challenge addressed	Commentary	Timescale	Method of monitoring
5	Investigate the barriers and constraints to housing delivery by engaging with developers/ agents of sites where it appears that construction activity has not started	Site specific issues, landowner/developer circumstances, stalled sites, macro-economics, viability, and deliverability	OPDC will engage with developers of sites to mitigate any constraints to housing delivery.	On-going	Authority Monitoring Report, site delivery
6	Monitor housing delivery and maintain a strong housing-related evidence base to assist in the early detection of housing delivery issues and timely interventions	Land supply, delivering affordable housing, housing supply and meeting housing need	OPDC monitors applications for new homes as part of the Authority Monitoring Report. There is a detailed database where information about each application and its delivery is maintained.	On-going	Authority Monitoring Report, site delivery
7	Deliver Old Oak West scheme	Site specific issues, landowner/developer circumstances, macro-economics, viability, and deliverability	OPDC has been assembling land for the comprehensive regeneration of Old Oak West. Key public sector sites are currently used for HS2 construction.	0 to 20 years	Authority Monitoring Report, OPDC Delivery Strategy, site delivery
8	Stakeholder engagement	Land supply, landowner/developer circumstances,	Utilise 'Agents and Developer Forums' to promote opportunities.	On-going	

	Action	Challenge addressed	Commentary	Timescale	Method of monitoring
		viability and deliverability			
9	Update and review Brownfield Land Register	Land supply, landowner/developer circumstances, macro-economics, viability, and deliverability	OPDC last updated the Brownfield Land Register in 2019 and it needs to be reviewed.	0 to 2 years	Updated Brownfield Land Register

8.0 Projecting housing delivery

8.1 OPDC can meet its housing targets over the next five years as set out in Figure 8.1.

Figure 8.1: OPDC housing supply

	Site	Status	Homes	2024/25	2025/26	2026/27	2027/28	2028/29
1	Mitre Yard (104-108 Scrubs Lane)	Started	241	241	-	-	-	-
2	North Kensington Gate	Started	208	-	208	-	-	-
3	140 Wales Farm Road (North)	Started	316	316	-	-	-	-
4	Land at Central Middlesex Hospital	Started	158	158	-	-	-	-
5	Small Sites (Various)	Permitted	18	18	-	-	-	-
6	4 Portal Way (Holiday Inn)	Permitted	702	-	-	702	-	-
7	The Portal, North Acton	Permitted	350	-	-	350	-	-
8	Atlas Wharf	Permitted	457	-	-	-	-	457
9	Castle Pub	Permitted	257	-	257	-	-	-
10	Mitre Wharf	Permitted	147	-	-	-	-	147
11	3 School Road	Permitted	176	-	176	-	-	-
12	1 Portal Way	Permitted	1538	-	-	-	674	864
13	2 Portal Way	Permitted	380	-	-	380	-	-
14	Submitted Apps, Pre-Apps or Developer Discussions	Not Yet Permitted	2904	-	63	1955	886	-
Total Supply of Homes			7852	733	704	3387	1560	1468

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