

# Response to second Old Oak and Park Royal Development Corporation (OPDC) revised draft Local Plan consultation



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## Introduction

The Mayor's draft London Plan identified that the Old Oak and Park Royal Opportunity Area has the capacity to deliver at least 25,500 homes with around 20,000 of these to be built over the OPDC local plan period (2017 – 2037).<sup>1</sup>

As such the OPDC site has the potential to make an important contribution to meeting London's housing need in the next two decades.

The Strategic Housing Market Assessment (SHMA) that underpins the draft London Plan found that 47 per cent of new homes delivered in London up to 2041 should be at low cost rent – social rent. And that accounts for about 70 per cent of the 'affordable' homes in general.<sup>2</sup>

## SHMA: Net annualised requirement for new homes in London, 2016 to 2041<sup>3</sup>

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms	Total	% of total
Market	10,682	2,043	4,101	6,210	23,037	35%
Intermediate	4,334	3,434	2,409	1,693	11,869	18%
Low cost rent	21,318	5,311	2,462	1,881	30,972	47%
Total	36,335	10,788	8,971	9,783	65,878	100%
% of total	55%	16%	14%	15%	100%	

The Mayor's draft London plan also says he wants to see a minimum of 30 per cent social rent and 30 per cent intermediate homes at each development with the other 40 per cent left for the local authority – in this case the OPDC - to decide, based on local need.

## Key problems

### 1. Tenure split of affordable homes does not reflect local housing need

At the OPDC plenary meeting I questioned the interim Chief Executive about the tenure split of affordable homes he expected to deliver at Old Oak.<sup>4</sup> He said "if we secure the 50 per cent (overarching strategic affordable housing) target, the number of affordable homes will be 10,050, the number of London Affordable Rent homes will be 3,015, and the level of intermediate housing will be 7,035. That is if we get to that target of 50 per cent. As we have already alluded to, that might be a challenge on some sites. If we have 35 per cent

affordable housing, what we would secure is 7,035 affordable units, 2,111 London Affordable [Rent] and 4,925 intermediate units”.

In each case, the tenure split proposed does not respond to the OPDC’s own assessment of local housing need. OPDC’s SHMA identified that there is a need for 86 per cent London Affordable Rent or equivalent housing as part of affordable housing need in the area.<sup>5</sup>

However, the following rationale is given in the latest draft of the local plan for the OPDC failing to meet this need and pursuing an alternative tenure split.<sup>6</sup>

*“8.22 The AHVA has assessed the viability of delivering different levels and types of affordable housing. Delivering London Affordable Rent housing has the greatest impact on viability given the high cost of delivering housing at this level of discount on the market value. Delivering intermediate housing (including London Living Rent and London Shared Ownership) helps to improve the overall viability of delivering affordable housing. Further evidence on tenure, housing need and development viability is available in the supporting Housing Evidence Statement.”*

*“8.23 In order to create inclusive new communities at Old Oak and Park Royal that are mixed and balanced by housing tenure and household income, OPDC’s target ratio for affordable housing is: a) 30% London Affordable Rent; b) 70% mix of intermediate housing including London Shared Ownership and London Living Rent.”*

At the OPDC plenary meeting, the interim Chief Executive argued that the OPDC had tested the viability of meeting its obligations to the Mayor by following his policy of setting tenure split “according to the identified need” of the local population and concluded it is not viable.

In contrast to this, amendments to the latest draft local plan, in section 8.19, means it now says:

*“8.19... the presence of abnormal site constraints should impact on land values; however, the cost should not necessarily be borne through a reduction in planning obligations.”*

This means that the tenure splits required by the OPDC SHMA can also be achieved without compromising planning obligations.

**This change to policy 8.19 shows that additional obligations can be achieved without compromising planning requirements. It means the OPDC leadership should be pushing harder to achieve a tenure split that meets the acute need for social housing in the local area. This can be achieved with lower land values – especially where lower cost public land is being used or is acquired by OPDC.**

At present, the draft local plan is not “based on a strategy which seeks to meet objectively assessed development and infrastructure requirements,” i.e. it is not prepared positively. Policy 8.19 should be clarified and tenure splits corrected in policy 8.23 to allow the OPDC to meet the objectively assessed development requirements of the OPDC site.

## 2. London Development Database is not an up-to-date record of planning permissions granted at OPDC site

During the plenary meeting the interim Chief Executive referred to figures not available on the London Development Database (LDD).<sup>7</sup> To enable proper scrutiny of the OPDC's progress in delivering affordable housing at Old Oak, the OPDC should report more regularly to it and LDD updates should be published with information about the latest permissions, not once per year as is currently the case.

Until more frequent LDD updates are available, the OPDC should maintain a rolling list of permissions on the London.gov.uk website.

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<sup>1</sup> Draft New London Plan. Mayor of London, Dec 2017

[https://www.london.gov.uk/sites/default/files/new\\_london\\_plan\\_december\\_2017.pdf](https://www.london.gov.uk/sites/default/files/new_london_plan_december_2017.pdf)

<sup>2</sup> 2017 London Strategic Housing Market Assessment. GLA, Nov 2017

[https://www.london.gov.uk/sites/default/files/london\\_shma\\_2017.pdf](https://www.london.gov.uk/sites/default/files/london_shma_2017.pdf)

<sup>3</sup> Table 1 from 2017 London Strategic Housing Market Assessment.

<sup>4</sup> OPDC meeting transcript. London Assembly Plenary, July 2018

<https://www.london.gov.uk/moderngov/documents/b17324/Minutes%20-%20Appendix%20%20-%20OPDC%20Thursday%2005-Jul-2018%2010.00%20London%20Assembly%20Plenary.pdf?T=9>

<sup>5</sup> OPDC Housing Evidence Statement. Mayor of London, 2017

[https://www.london.gov.uk/sites/default/files/23\\_housing\\_evidence\\_statement\\_0.pdf](https://www.london.gov.uk/sites/default/files/23_housing_evidence_statement_0.pdf)

<sup>6</sup> OPDC local plan with tracked changes. GLA, June 2018

[https://www.london.gov.uk/sites/default/files/opdc\\_local\\_plan\\_2018\\_with\\_tracked\\_changes.pdf](https://www.london.gov.uk/sites/default/files/opdc_local_plan_2018_with_tracked_changes.pdf)

<sup>7</sup> London Development Database. GLA <https://www.london.gov.uk/what-we-do/planning/london-plan/london-development-database>