

**Title of Report:** Western Lands and Local Plan Modifications Update  
**Meeting date:** 13 October 2020  
**Report to:** Board  
**Report of:** Ben O'Neill, Development Director and  
Emma Williamson, Director of Planning

**For noting and decision**

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**This report will be considered in public**

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**1. Summary**

- 1.1. This report updates the Board on work that has been progressed since its last meeting to develop the revised approach to major redevelopment that we have designated as the 'Western Lands'. This aims to bring forward major sites to the north and west of the new HS2 interchange at Old Oak Common, including significant public sector land holdings and catalytic infrastructure improvements. In so doing, the strategy has the potential to support delivery of over 20,000 homes, up to 60,000 jobs and over 5 million square feet of new employment space over the course of our Local Plan period.
- 1.2. To further these ambitions, OPDC's Planning and Development directorates have been working closely together to support the submission of Local Plan modifications to enable a fundable infrastructure delivery and development plan and meet these London Plan housing targets.
- 1.3. As well as working on the longer-term strategic objectives to secure the comprehensive regeneration of the OPDC area, our aim is to also de-risk the Local Plan modification process by refining and rationalising the essential infrastructure required to deliver its policies and targets.
- 1.4. In the context of the Planning Inspector's interim report of October last year, our new approach to the delivery of our regeneration ambitions and our London Plan housing and employment targets, we have engaged extensively with partners and stakeholders over the first six months of this year. As a result, we are now able to progress draft Local Plan modifications and accelerate funding discussions with government.
- 1.5. This report will be supplemented with a presentation at the Board meeting.

## **2. Recommendations**

**The Board is asked to:**

- 2.1. Note that landowner and community engagement as set out in this report has now commenced.**
- 2.2. Review the proposed Local Plan modifications and approve these as the basis for the next stage of formal landowner and community engagement.**
- 2.3. Note the potential funding sources that will be explored further in the Western Lands funding strategy.**
- 2.4. Approve expenditure of £257,000 in this financial year for preliminary technical work required to prepare a Single Housing Infrastructure Fund (SHIF) bid and business case. Together with two previous approvals, this will commit the remainder of OPDC's £440,000 budget for Western Lands preparatory work in 2020/21.**
- 2.5. Delegate detailed spending proposals to senior officers' approval, through the Corporation's decision form procedure, within the Boards approval set out in 2.4.**

## **3. Background**

- 3.1. The Board is aware that last October the Planning Inspector's interim report findings determined that our plans for the allocation of land at Old Oak North (OON) for residential and mixed-use development was not viable for the purposes of the Local Plan.
- 3.2. Following the receipt of the interim report, and at the request of the Board, the Mayor formally withdrew OPDC's bid for government Housing Infrastructure Funding (HIF) as this was contingent on the Local Plan supporting the redevelopment of OON.
- 3.3. Since the withdrawal of the HIF bid, we have been reviewing our plans with a view to submitting modifications to the draft Local Plan that reflect and support our new approach to the strategic redevelopment for Old Oak, which we believe are best served by focussing mainly on redeveloping for residential and mixed use, key sites to the west, north west and south west of the new HS2/Elizabeth Line/GWR interchange at Old Oak Common.
- 3.4. This new approach will involve the release of protected Strategic Industrial Location land (SIL) in parts of the Western Lands, in favour of residential and mixed-use site allocations, whilst confirming SIL status and promoting industrial intensification on land in OON so as to protect overall industrial and employment capacity in line with London Plan policies. In doing so, we believe this will enable

OPDC to meet both its housing and employment targets and assist in the industrial intensification and modernisation of existing businesses in OON.

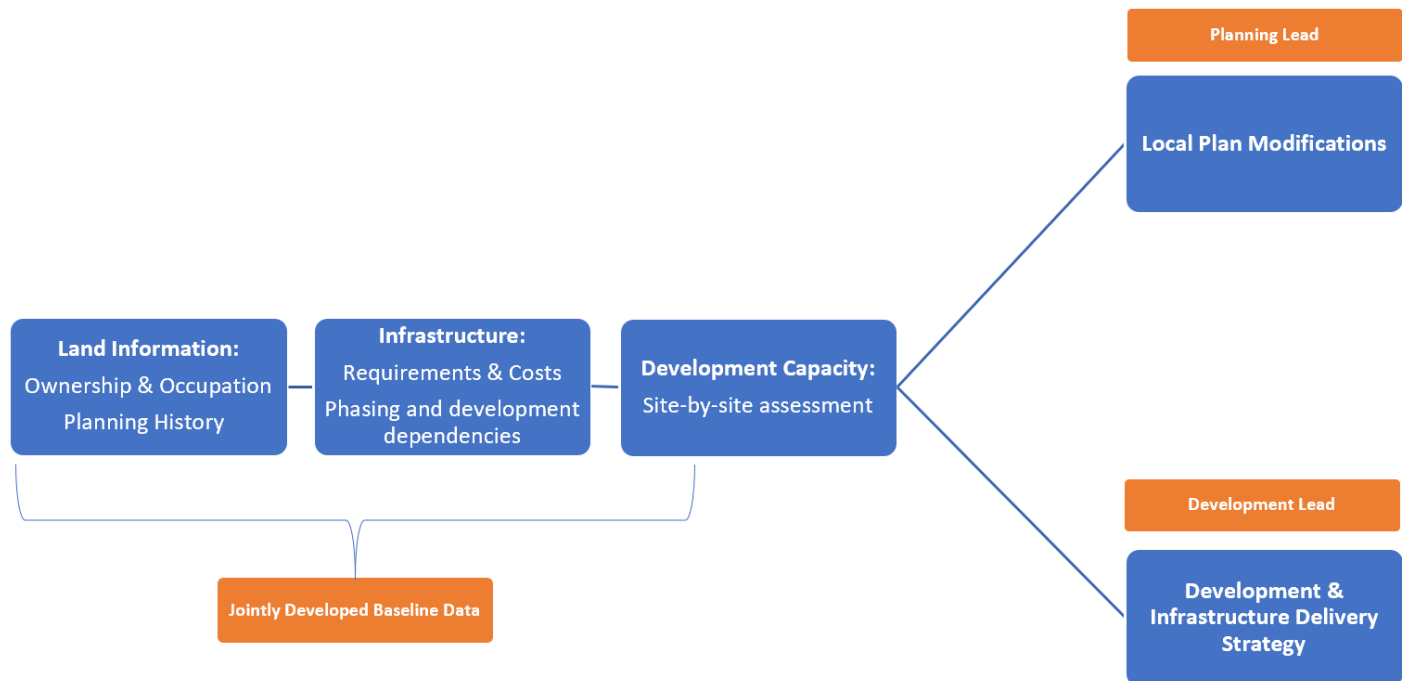
- 3.5. This new approach, which we refer to as the 'Western Lands' approach, has a number of major advantages over the previous focus on OON. These include a more natural connectivity with the main station access point and associated concourse and public realm; taking advantage of a number of major sites that are in public ownership via HS2/Department for Transport (DfT) and Network Rail (and mainly without large scale third party business occupiers); and an existing level of infrastructure and connectivity that is much better than OON.
- 3.6. We commissioned Prior & Partners (P&P) to assess the scope and scale of potential that this new approach might represent. Board Members have seen this work, which has proved extremely valuable in helping to frame our further technical assessments, and it is clear from the P&P report that the scale of opportunity in the Western Lands is of an order that has few current comparators in London – all the more so now that government has confirmed full support for HS2, which will make Old Oak Common a uniquely well-connected location. As the capital begins to emerge from the Covid-19 pandemic and deal with its economic aftermath, the importance of fully exploiting this potential is more acute than ever, and brings with it an opportunity to 'bake in' some of the emerging choices and innovations that a post-Covid urban district will require.
- 3.7. The Western Lands includes large sites that will remain in use by HS2 as works sites for a number of years (although they should mainly be released prior to the completion of the station) and also a number of Network Rail assets that are subject to freight protection designations. It seems likely, however, that a combination of several early win/opportunity sites, and the medium to longer-term release of major rail sites, has the capacity to deliver at least as many homes and employment opportunities as was proposed for OON. It is also clear that our new strategy can benefit from our close working relationship with both HS2 and Network Rail, which offers the prospect of a coordinated and closely managed process of infrastructure provision, land release and development.
- 3.8. Since adopting this new high-level approach, we have had a series of discussions with key partners, including HS2, Network Rail, Ministry for Homes, Community and Local Government (MHCLG), Homes England, local boroughs and private landowners. As well as undertaking detailed technical analysis of the land in question, with a view to assembling credible modifications to the draft Local Plan and the foundations for a future funding bid to support infrastructure and enabling activity that we believe will be necessary to bring forward our ambitions.
- 3.9. Over the spring and summer, our Planning and Delivery teams have worked to:
  - refine our Western Lands strategy and secure the evidence base we need for planning and funding purposes.

- seek wider support for the new approach with key stakeholders, including local boroughs, HS2 and Network Rail.
  - quantify and identify the potential funding support required to realise our ambitions.
  - develop potential modifications to the draft Local Plan that will provide for a Plan that will support our strategy.
- 3.10. In that time, we have engaged with local landowners, the local boroughs, community groups, MHCLG, Transport for London (TfL), HS2, Network Rail and the Greater London Authority (GLA). We have also begun some informal engagement with the wider development community.
- 3.11. Based on this work, we are now able to recommend the basis of further landowner and community engagement on potential modifications to the draft Local Plan, as a precursor to submitting modifications to the Inspector in the early New Year.
- 3.12. We are also well placed to begin work on a bid to SHIF, expected to be formally launched as part of the forthcoming Comprehensive Spending Review, for funding and investment support for our Western Lands strategy. We are therefore requesting approval for expenditure to support the necessary technical work.

#### **4. Joint work programme**

- 4.1. OPDC's Planning and Development directorates have progressed work on two parallel workstreams:
- the proposed Local Plan modifications.
  - a Funding & Delivery Strategy, including a potential SHIF bid.
- 4.2. This has involved work to develop a common baseline of infrastructure requirements, development capacities and timescales to ensure the Local Plan is robust and supported through to adoption and can in turn go on to support delivery (see figure below and Appendix 1).

Figure 1 – Jointly Developed Baseline Data for Local Plan and Delivery work



## 5. Local Plan modifications and programme

### Overview of modifications

- 5.1. The draft proposed modifications outlined below have been developed internally and form the basis for engagement with stakeholders. We will also be undertaking more detailed technical work to support the proposed modifications and engage further with landowners. Following this, the final draft proposed modifications will be put to the Board for approval in February 2021.
- 5.2. The modifications to the Local Plan are being drafted in response to:
  - the recommendations of the Planning Inspector in the lead up to and during examination hearings.
  - the Inspector's Interim Findings on site allocations within OON, which directed that two housing site allocations be removed from the Local Plan. Officers are progressing modifications that respond to these Interim Findings while continuing to ensure that OPDC can meet its housing targets defined in the London Plan, and by doing so, support OPDC's Western Lands strategy.
  - changes to the Use Class Order, introduced by government in September 2020.
- 5.3. The Inspector's Interim Findings for OON found that rising industrial land values, coupled with infrastructure and policy requirements, rendered parts of OON unviable for housing-led development – and he therefore directed OPDC to

remove Site Allocations 2 (Cargiant) and 3 (Triangle Business Centre) from the draft Local Plan. Following on from the Inspector's Interim Findings, OPDC withdrew its Housing Infrastructure Fund (HIF) bid for Phase 1a in OON. As well as parts of Site Allocation 2 and 3, Phase 1a of our OON Plan proposals had included the European Metal Recycling (EMR) site (Site Allocation 4). Officers consider that the withdrawal of OPDC's HIF bid and the removal of housing site allocations to the south render the EMR site no longer appropriate for housing-led development.

- 5.4. In light of the above, officers are proposing to reinstate SIL designations in OON to provide clear planning policies to support industrial uses. The reinstated SIL will also support industrial intensification and an increase in industrial floorspace across Old Oak and Park Royal to meet local and strategic needs.

- 5.5. These proposed modifications do not compromise our existing overall vision for the OPDC area as set out in the Draft Local Plan which remains as follows with the added benefit of also creating a world class industrial intensification area in Old Oak North:

*'Old Oak and Park Royal will be a highly connected part of London, playing an important role in shaping west London's future and driving national economic growth. It will comprise a network of places including an innovative industrial area in Park Royal and a new, high-density and vibrant part of London at Old Oak. It will be home to a diverse and intense mix of uses, places and people. Development will pioneer international excellence in sustainability, health and wellbeing and design quality to deliver tangible benefits for both local communities and London.'*

- 5.6. The London Plan sets OPDC a target to deliver 13,670 homes over a ten-year period from 2018/19 to 2028/29, with an overarching target to deliver 25,500 homes. OPDC's submitted draft Local Plan met these targets. The removal of housing Site Allocations 2, 3 and 4, however, results in OPDC being short of the ten-year and overarching targets by 3,691 and 6,335 homes respectively. The loss of this capacity means there is a need to identify alternative sites for housing to maintain general conformity with the London Plan. As well as affecting OPDC's ability to demonstrate general conformity with the London Plan, without further modifications to our draft Local Plan these changes raise the prospect of also undermining our ability to meet the housing need assessment within our strategy housing market area.

- 5.7. Some of this potentially lost housing capacity can be met by recognising development that has already occurred on 'windfall' development, on sites not previously envisaged for housing delivery within the Local Plan, by revising the phasing for some sites that can now be delivered earlier in the plan period, and by amending land use divisions on existing sites allocated for mixed use development. This, however, will not enable the full Plan targets to be satisfied. There is, therefore, a need also to release some land previously designated as

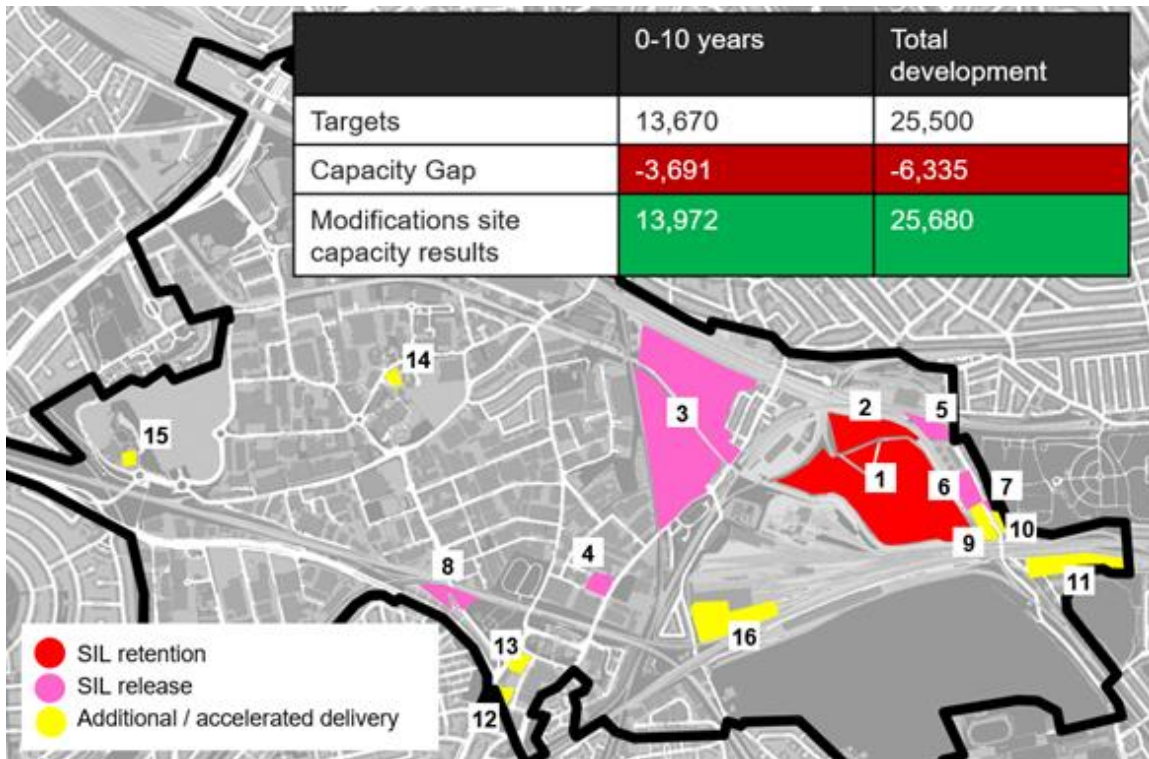
SIL in the draft Local Plan for housing development – an approach that fully supports our broader aims for the Western Lands. Officers have been reviewing sites for potential SIL release, prioritising those sites considered to be developable, close to public transport and which are also contiguous with existing areas already proposed for SIL release.

- 5.8. Table 1 provides a summary of each of the sites and their emerging proposed housing capacities. The locations are marked on Map 1. These are subject to landowner feedback and may change, although the overall housing numbers will of course need to meet the London Plan targets.

*Table 1 – List of sites proposed for modification*

	Site	Delivery Phase	Additional London Plan ten-year capacity		Additional total capacity	
			Homes	Jobs	Homes	Jobs
<b>1</b>	<b>Cargiant Old Oak North (including LBHF triangle)</b>	0-20 years	0	TBD	0	TBD
<b>2</b>	<b>EMR</b>	0-20 years	0	TBD	0	TBD
<b>3</b>	<b>Channel Gate</b>	0-20 years	1,200	390	3,100	1,000
<b>4</b>	<b>3 School Road, and 99 Victoria Road</b>	0-10 years	530	240	530	240
<b>5</b>	<b>Prestige Cars (CG)</b>	0-10 years				
<b>6</b>	<b>Cumberland House and Car Park (CG)</b>	0-10 years				
<b>7</b>	<b>Mitre House (CG)</b>	0-10 years	50-80	47	50	47
<b>8</b>	<b>Park Royal Road sites</b>	0-10 years	75	10	75	10
<b>9</b>	<b>Mitre Yard</b>	0-10 years	41	0	41	0
<b>10</b>	<b>North Kensington Gate</b>	0-10 years	46	0	46	0
<b>11</b>	<b>North Pole East Depot</b>	0-10 years	650	40	650	40
<b>12</b>	<b>6 Portal Way</b>	0-10 years	123	0	123	0
<b>13</b>	<b>4 Portal Way</b>	0-10 years	702	140	702	140
<b>14</b>	<b>Central Middlesex Hospital</b>	0-10 years	158	0	158	0
<b>15</b>	<b>1 Lakeside Drive</b>	0-10 years	250	40	250	40
<b>16</b>	<b>Old Oak Common Station ASD</b>	11-20 years	0	0	650	0

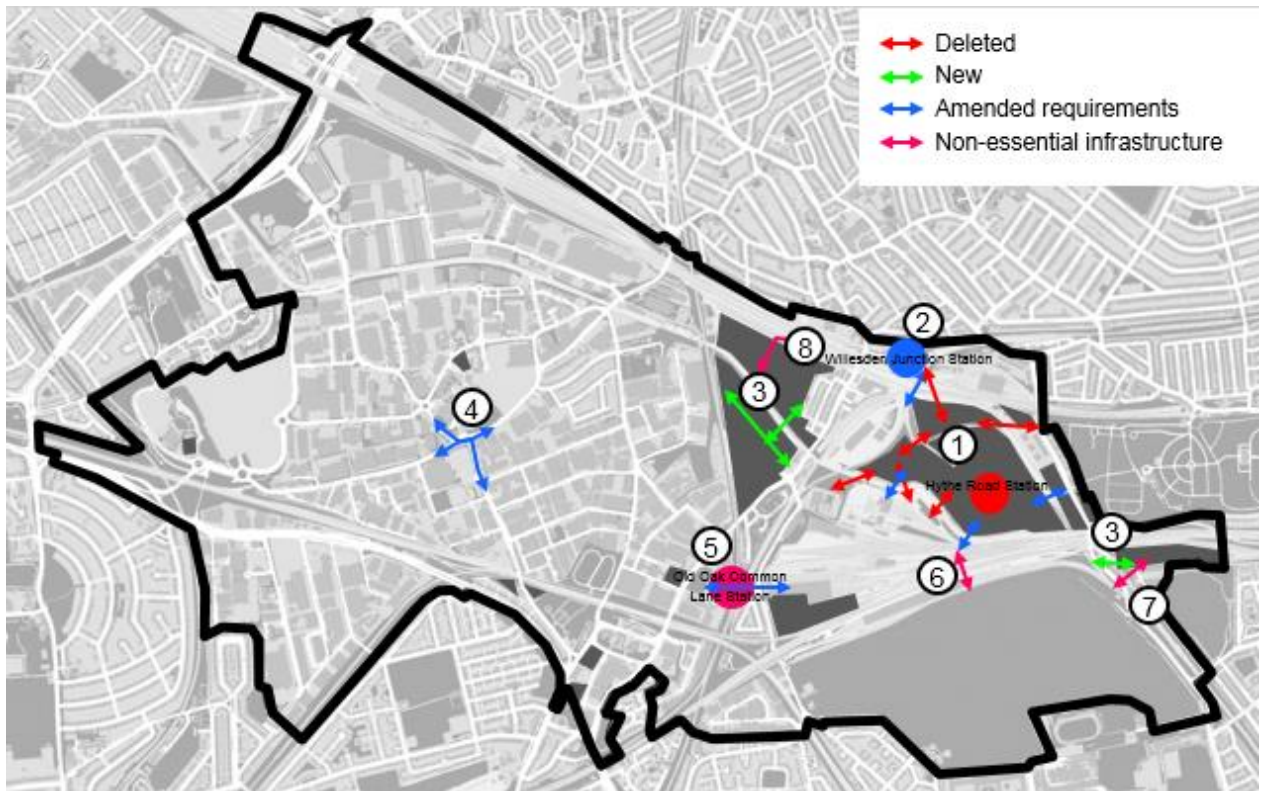
*Map 1 – Location of sites proposed for modification*



- 5.9. Appendix 2 provides an overview of emerging proposed policies for the sites, which will be the basis for the next stage of consultation and engagement with landowners and other stakeholders.
- 5.10. The Inspector's Interim Findings have resulted in revised infrastructure requirements that will also need to be reflected in revisions to the draft Local Plan. Officers have been identifying infrastructure items that need to be either added, removed or amended consequent to the revisions to site allocations contained in the draft Local Plan. The updated infrastructure requirements are a work in progress and will be informed by emerging technical and evidence work, such as the Social Infrastructure Needs Study (see Table 2).
- 5.11. Map 2 below shows the key infrastructure changes that officers have identified thus far, through discussions with service providers.



Map 2 – Proposed infrastructure amendments



5.12. The changes include:

- the removal of a significant proportion of infrastructure requirements in earlier OON proposals (marked 1 in Map 2), which are no longer required given the removal of the housing allocations and their replacement with infrastructure requirements to support and enable industrial intensification and improve pedestrian and cycle connectivity.
- rationalising the infrastructure requirements at Willesden Junction (2) to reflect the fact that there is no longer a need for the station to deliver a new entrance into OON.
- new on-site infrastructure (3) (transport, environmental, utilities and social infrastructure) where it is required to support the delivery of new site allocations.
- an amendment to the proposed re-design of Park Royal Centre junction (4). The previous plans focussed on re-orientating the junction to deliver better pedestrian and cycle connectivity and enhanced public realm. The revised plans, which were scoped out through OPDC's Liveable Neighbourhood Fund bid, propose to work with the existing alignment of the junction while delivering a new traffic management solution cutting off through traffic and enhancing

pedestrian, cycle and public realm of better quality than the previous proposals.

- 5.13. As OPDC continues its Examination in Public, it needs to demonstrate to the Inspector that the infrastructure required to support the delivery of the Local Plan is fundable and therefore deliverable. Officers will be updating the Infrastructure Delivery Plan (IDP) to identify infrastructure that is essential to support the delivery of a high-quality place and the homes and jobs targets in the draft Local Plan. The updated IDP will show the likely necessary developer contributions towards essential infrastructure, other committed funding sources and potential funding sources that can be used to meet any infrastructure funding gap.
- 5.14. The updated IDP will also identify those infrastructure items that are desirable but not considered to be essential to deliver the draft Local Plan's homes and jobs targets and place-making ambitions. There will be less of a need for OPDC to demonstrate the funding and deliverability of this infrastructure to the Inspector, but the draft Local Plan would still safeguard their potential future delivery. These non-essential infrastructure items are envisaged to include:
- Old Oak Common Lane Overground station (marked 5 in map 2). The east-west overbridge through the station is considered essential as it would provide an important pedestrian link between Old Oak Common, North Acton and Park Royal. The station itself, however, is not considered to be necessary to support the delivery of the draft Local Plan's vision or homes and jobs targets, as it would not give rise to significant additional local public transport access. The station has a strong strategic transport case and subject to plans for the West London Orbital coming forward and/or Old Oak Common station being required to function as a temporary terminus, its strategic importance could grow. The draft Local Plan would continue to identify the long term need for the station and safeguard land for its future possible delivery.
  - pedestrian and cycle access from Old Oak Common station into Wormwood Scrubs (6). This infrastructure was considered essential when a significant number of homes and jobs were being planned within OON. It is now, however, no longer considered essential to support development as the proposed revised housing site allocations focus housing on Old Oak Lane/Victoria Road and Scrubs Lane, which already provide access to Wormwood Scrubs. Infrastructure negotiations with developers would focus on enhancing the walking and cycling environment on these existing routes.
  - vehicular access off Scrubs Lane into the North Pole East Depot (7). Pedestrian and cycle access between Scrubs Lane and the North Pole depot is considered essential to enable people living in the North Pole East development to access bus services on Scrubs Lane. A vehicular connection is, however, considered non-essential as there are alternative vehicular access points into the North Pole East Depot via Barlby Road and Mitre Way.

- a new junction and road on Old Oak Lane into Channel Gate (8). The revised modifications in the Local Plan are not proposing an intensification of freight use on the freight depot to the north of the Channel Gate site, but if the landowner were to propose intensification, it is envisaged that this new connection would be required.

### *Supporting studies*

- 5.15. The modifications are being informed and supported by a portfolio of evidence base documents

*Table 2 – Draft Local Plan new and amended supporting studies*

<b>Study title</b>	<b>Rationale</b>
Old Oak North Intensification Study (new)	Demonstrate potential for industrial intensification in OON to support industrial site allocations and show how OON can contribute to OPDC's target to deliver a net gain in industrial floorspace
Viability Assessments (new and updated)	To support the allocation of new or changes to existing site allocations
Channel Gate Development Framework (new)	To support the proposed land use approach taken to the Channel Gate site
Scrubs Lane Development Framework (updated)	To support the proposed changes in development phasing and connections to Old Oak North.
Industrial Land Review (update)	To demonstrate how OPDC can continue to meet industrial floorspace needs, as required by the London Plan
Development Capacity Study (update)	To reflect updated development capacity arising from the removal of existing and addition of new site allocations and demonstrate general conformity with London Plan homes and jobs targets
Retail Leisure Needs Study (update)	To evidence the quantum and spatial distribution of OPDC's town centre hierarchy required to support the draft Local Plan's revised land uses designations and development trajectory
Social Infrastructure Needs Study (update)	To evidence social infrastructure needs arising from the phased increase in population
Infrastructure Delivery Plan (update)	To reflect the updated infrastructure requirements arising from OPDC's revised land use designations and development trajectory

<b>Study title</b>	<b>Rationale</b>
Bus Strategy (update)	To evidence the required movement network to support OPDC's revised land use designations
Grand Union Canal Massing and Enclosure Statement (update)	To provide updated evidence on the approach to massing along the Grand Union Canal, reflecting any modifications to site allocations
Tall Buildings Statement (update)	To provide evidence to justify any changes required to locations identified as appropriate in principle for tall buildings
Integrated Impact Assessment (update)	To assess the social, economic, environmental, health and equalities impacts of the modified policies

### *Programme*

5.16. Below is an overview of main steps in finalising the Local Plan.

<b>What</b>	<b>When</b>
Drafting of modifications and supporting studies	October to December 2020
Landowner engagement and stakeholder discussion	October to December 2020
Board decision to submit the modifications	February 2021
Submission of modifications	February 2021
Potential further hearings, public consultations and drafting of Inspector's Report	Spring and summer 2021
Finalising the Local Plan	Autumn 2021
Adoption	Autumn 2021

5.17. Engagement with landowners and stakeholders will be conducted in accordance with OPDC's Statement of Community Involvement (SCI). An updated draft of the SCI is currently out for public consultation, which sets out how consultation and engagement will be conducted safely and in line with Covid-19 social distancing measures.

## **6. Western Lands: Funding and Development Strategy**

6.1. Working closely with policy colleagues, our Delivery directorate has been working on a funding and development strategy. The objectives of this work are to support the Local Plan with a credible infrastructure delivery plan and bring forward public sector land for development.

- 6.2. While the strategy will look to identify support for the delivery of our Western Lands ambitions generally, it is focused on two early requirements:
- supporting the early delivery of sites that can come forward prior to the release of HS2's major sites, and the delivery of which is not dependant on strategic infrastructure.
  - securing the maximum benefit from the release of the major HS2 sites, including supporting strategic infrastructure and the development of adjacent land.
- 6.3. This emerging strategy has been subject to extensive engagement with the major public sector landowners (HS2, Network Rail and TfL) and our potential funding partners (MHCLG and Homes England).
- 6.4. The strategy, anticipated to be underpinned by a future bid for funding (see below), is being developed across three interconnected areas: infrastructure delivery, development and funding (as set in Appendix 1).
- 6.5. While working closely with Homes England and MHCLG, we anticipate that we will have an opportunity to submit proposals for SHIF. Government's requirements, conditions, process and format for any such submission have yet to be released. We are aware, however, that schemes that can deliver early results are likely to be prioritised, and for this reason, as well as the need to support the critical timeframe associated with our Local Plan modifications, the Board is therefore requested to approve an expenditure envelope, as set out below, to allow us to respond to this opportunity quickly.

#### *Infrastructure delivery*

- 6.6. We have established the main infrastructure needed to support the development of the Western Lands and set out these requirements over time in line with the Local Plan development trajectory.
- 6.7. An initial review of the extent to which infrastructure can be delivered through planning obligations, safeguarding or the Community Infrastructure Levy, and any requirement for more direct support for development, is being tested, with an emphasis on developing a deliverable strategy for the first decade of the Local Plan.
- 6.8. Further input is expected from the evidence work on the draft Local Plan modifications, including social infrastructure needs, detailed site allocations and feedback from consultation.

#### *Accelerating early delivery and safeguarding future development*

- 6.9. Several public sector owned sites have the potential to be brought forward ahead of the delivery of strategic infrastructure. This includes sites owned by Network

Rail and TfL. We are working with these landowners to support their early release.

- 6.10. We are also working with the GLA's Housing & Land directorate to see what opportunities there are for the GLA to support the acceleration of sites through its lending, investment or land acquisition capabilities, as well as future allocations of Affordable Housing Grant (see below).
- 6.11. HS2's sites are due to be released from construction activity between 2026 and 2028 and we have been working to ensure that supporting infrastructure and adjacent land can be brought forward in a way that maximises their regeneration potential.
- 6.12. Network Rail is also carrying out a review of its freight infrastructure within our area and we are supporting that work to see where it can be protected, improved to support sustainable logistics, consolidated or released to bring forward land for other uses.

#### *Funding*

- 6.13. The funding element of the strategy is being developed with input from the GLA Group, MHCLG and Homes England. Potential sources of funding are discussed below. Bids and the receipt of any funding would, as relevant, be subject to Board approval.

#### *TfL funding*

- 6.14. Significant uncertainty remains for TfL as it continues to negotiate a financial settlement with government. This has had a major impact on its capital planning and as a result we are developing our funding strategy without assuming any significant capital expenditure by TfL in its area.
- 6.15. This impacts potential contributions to general highways, cycling or bus infrastructure and station upgrades at North Acton or Willesden Junction. It does not include future Elizabeth line services at Old Oak Common Station, being delivered by HS2.

#### *Housing grant*

- 6.16. On 8 September government announced an £11.5bn Affordable Homes Programme (AHP) for 2021 to 2026. This includes a £4bn settlement for London. The timing of the programme aligns with OPDC's zero to five-year Local Plan housing targets and could support the delivery of affordable homes within our area. We are in discussions with GLA colleagues as to the potential for AHP grant to support affordable housing delivery and leverage government funding support alongside this investment.

### *Single Housing Infrastructure Fund (SHIF)*

- 6.17. OPDC has been working closely with Homes England on the funding requirements to support its Western Lands strategy. This includes developing a broad range of potential infrastructure and development opportunities ahead of refining the scope and phasing of a package of funding support.
- 6.18. The fund is expected to provide for greater flexibility in delivery timescales than the current Housing Infrastructure Fund, allowing OPDC to develop proposals across potential early delivery sites and a longer-term strategy alongside HS2's programme of delivery and land release.
- 6.19. Officers worked closely with colleagues at GLA and TfL to ensure OPDC is a focus with the Mayor's Comprehensive Spending Review (CSR) representations, both in respect of potential SHIF funding and to press for a coordinated approach, working closely with government, to developing public sector land. This builds on extensive pre-CSR discussions with MHCLG, the Infrastructure Project Authority (IPA) and Homes England.
- 6.20. Based on feedback from this engagement, the Board is recommended to approve expenditure on technical work required to underpin and prepare a business case to make the case for SHIF investment. This will be met from the Development directorate's Western Lands budget in the financial year 2020/21. Expenditure will be released in stages, with relevant approvals by the Chief Executive Officer, as OPDC establishes its eligibility and is confident its proposals meet the funding criteria.

### *Tax Increment Funding (TIF), including Business Rates Retention*

- 6.21. OPDC's initial analysis of the Western Lands area identified six to eight million square feet of employment space. Alongside its work on the Park Royal Funding Strategy, OPDC will review the feasibility and scale of a potential TIF scheme or similar to contribute to the infrastructure costs for Old Oak.

## **7. Other considerations**

### *Risks and issues*

- 7.1. Our delivery strategy is at an early stage and is subject to design development risk. Infrastructure scope and costs are likely to change as developed, including plot-specific infrastructure, utilities and land remediation costs.
- 7.2. Development and infrastructure delivery is significantly dependant on the adoption of the Local Plan and the allocations set out therein. De-risking the Local

Plan modifications will remain a key factor in supporting any potential SHIF funding request.

- 7.3. The delivery of some key infrastructure may require land or rights which, if not secured through planning safeguards, we may need to acquire. We will be developing any land assembly strategy as part of the SHIF proposals.
- 7.4. We are asking the Board to approve an expenditure envelope for technical work required to develop a SHIF bid as we will need to respond quickly as and when guidance on the bidding process is made available.
- 7.5. The Development Director will have responsibility for this budget. The Chief Executive Officer will be the senior sponsor for this work. Subsequent decision-making, in respect of the detailed spending proposals, will, subject to Board approval, be delegated to officers. The Chief Executive's approval will be required for expenditure over £50,000.
- 7.6. This delegation, and any procurement within it, will be managed through stages ensuring that potential risk of incurring expenditure and not securing a successful outcome is mitigated. Expenditure will be controlled to avoid potentially abortive costs (for example, in the event of delay or failure to adopt the proposed Local Plan modifications).
- 7.7. There is a risk that landowners, and others, will object to the revised site allocations and that the Inspector will not agree that our new approach is appropriate. However, the revised strategy spreads the risk over a number of sites and is not as reliant on the willingness of one landowner as was previously the case.

## **8. Equality comments**

- 8.1. The public sector equality duty requires the identification and evaluation of the likely potential impacts, both positive and negative, of the decision on those with protected characteristics (age, disability, gender reassignment, pregnancy and maternity, race, gender, religion or belief, sexual orientation). An update to the Integrated Impact Assessment, which comprises an Equalities Impact Assessment, will be undertaken for the Local Plan modifications once these are completed.
- 8.2. OPDC's infrastructure, development and funding work is at an early stage and does not have yet any identifiable equalities impact. As and when specific proposals or recommendations from this work be brought forward, the equalities impact will be considered at that time.



## **9. Financial Implications**

- 9.1. Expenditure of up to £257,000 on technical work required to prepare a SHIF bid and the business case will be funded from the Delivery budget. Expenditure within the Board's approval is subject to the Corporation's officer-level decision-making process. Any individual proposal over £50,000 will be approved by the Chief Executive Officer through a decision form.
- 9.2. This approval is additional to those previously made by the Chair, including in May 2020 through OPDC's urgency procedure (£33,000 of committed costs) and further to June 2020's Board Advisory Panel (£150,000). The Board's total approval limit for Western Lands work is therefore £440,000, within which £44,500 has been committed to date. The Board's aggregate approval is equivalent to the totality of the 2020/21 revised Western Lands budget.

## **10. Legal implications**

- 10.1. There are no legal implications.

### **Appendices**

- Appendix 1 – Local Plans and Development workstreams
- Appendix 2 – Draft Local Plan Summary of proposed site modifications

### **Background Papers**

- January 2020 Board Paper: [New Focus for Old Oak and Park Royal Regeneration](#)
- March 2020 Board Paper: [OPDC Local Plan](#)
- June 2020 Board Paper: [Western Lands Update](#)

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