



OLD OAK PARK LIMITED

Written Statement in Response to Matter 4

Old Oak and Park Royal Development Corporation Local Plan Examination

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1. INTRODUCTION

- 1.1 This Written Statement has been produced by DP9 Limited on behalf of Old Oak Park Limited ('OOPL') in response to Matter 4 and should be read in conjunction with the accompanying Written Statements on Matters 3, 9 and 13 and our Explanatory Note relating to the change in OOPL's representations from the Regulation 18 and 19 stages of the Plan.

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- 2. MATTER 4 – WHETHER THE NEXUS BETWEEN DENSITY/ INTENSITY, HEIGHT AND HOUSING TARGETS IS JUSTIFIED IN THE LIGHT OF UNCERTAIN DELIVERY OF TRANSPORT INFRASTRUCTURE**
- 2.1. Our Written Statement in response to Matter 3(b) identifies our concerns in relation to the delivery and funding of the transport infrastructure required to support the proposed housing targets, and our Written Statement in response to Matters 3(a) and 9 identify significant doubts over justification for and effectiveness of the approach that has been taken by the OPDC towards assessing the viability of development within its area.
- 2.2. This Statement considers the housing targets for the OPDC Local Plan (which are driving density/intensity) in light of the uncertain delivery of transport infrastructure.
- 2.3. The London Plan 2016 (OSD27) identified a minimum of 24,000 new homes and an indicative employment capacity of 55,000 for the Old Oak Common Opportunity Area, with 1,500 and 10,000 respectively for the Park Royal Opportunity Area. In the Draft London Plan 2017 (OSD14), these targets are combined into a single target of a minimum of 25,500 new homes and an indicative employment capacity of 65,000.
- 2.4. The London Plan 2016 policy 2.13Bc identifies that the homes and jobs targets should be *“tested as appropriate through opportunity area planning frameworks and/or local development frameworks”*.
- 2.5. The Old Oak and Park Royal OAPF (OSD30) states at paragraph 1.23 that *“Initial assessments undertaken by OPDC suggest that Old Oak and Park Royal combined could accommodate the delivery of 25,500 homes and 65,000 jobs.*

OPDC will, through its Local Plan, carry out work to further consider the deliverable quantum of development.”

- 2.6. The Second Revised Draft Local Plan (ID/1) considers that *“the OPDC area is capable of accommodating 26,500 homes, of which a minimum 20,100 could be delivered in the next 20 years”*. This figure is derived from the Development Capacity Study (‘DCS’) (SD56) produced in June 2018. The DCS identified 55 sites to identify a notional capacity for housing of 20,100 and capacity for 40,400 jobs over the next 20 years. It is recognised that the DCS is a ‘snapshot’ in time and may change over time as more detailed information for sites becomes available, however we would note that the Local Plan only identifies 31 sites for housing yet retains the same notional delivery capacity.
- 2.7. On the basis of our concerns regarding the IIA, viability and deliverability, we do not consider that the Local Plan does effectively consider the deliverable quantum of development or justify the quantum it still targets, which we believe is still significantly overestimating the number of homes and jobs that can be delivered. This is linked to two key factors:
- The funding and deliverability of transport infrastructure; and
 - The practical delivery constraints of key sites which make development unviable
- 2.8. The attached plan at Appendix A illustrates an up to date view on the viable and deliverable capacity within the OPDC, which is summarised below:

	Local Plan Second Revised Draft		February 2019 reality		Difference	
	Homes	Jobs	Homes	Jobs	Homes	Jobs
Old Oak North	8,464	4,556	2,264	1,636	-6,200	-2,920

Old Oak South	1,155	15,490	1,155	15,490	0	0
Old Oak (North and South)	9,619	20,046	3,419	17,126	-6,200	-2,920
OPDC area outside Old Oak North and South	8,715	15,052	8,715	15,052	0	0
Total OPDC area	18,334	35,098	12,134	32,178	-6,200	-2,920

Source: Second Revised Draft Local Plan Table 3.1 Site Allocations

- 2.9. Against a total minimum target of 25,500 new homes and capacity for 65,000 new jobs, we consider that the Plan now looks capable of delivering only 12,134 new homes and capacity for 32,178 jobs within the next 20 years.
- 2.10. Most importantly, within Old Oak we consider that only 3,419 homes and capacity for 17,126 jobs is likely to come forward. This further supports our position on retaining the SIL in Old Oak, as set out within the Written Statement in response to Matter 13.
- 2.11. In light of the significant reduction in the number of new homes and jobs that could now come forward, the funding gap of £800m within the total infrastructure cost of £1.1bn will grow, through reduced income from CIL and section 106 site-specific contributions. This also brings into question the need to spend such significant amounts of money on providing infrastructure to deliver such a reduced quantum of development.

3. SUMMARY AND CONCLUSIONS

3.1. We consider that the Plan's policies concerning the delivery of new homes and jobs are not justified and will not be effective. In summary:

- The housing targets identified in the Plan do not reflect the reality of delivery. Rather than the 20,100 homes and 40,400 jobs the Plan identifies as being deliverable, only 12,134 homes and 32,178 jobs are actually deliverable within the Plan period. This further illustrates how the Plan has failed to properly assess and justify its policies towards the quantum of development and housing targets;
- Most notably in Old Oak, of the 24,000 homes and 55,000 jobs originally targeted to establish the strategic importance that justifies the release of a significant area of SIL, only 3,419 homes and 17,126 jobs are actually capable of delivery.

3.2. As a result of the above, the Plan is unsound. Given the nature of the unsoundness, we consider that a fundamental reconsideration of the Plan's spatial strategy and target home and job numbers is required in order for it to be made sound.

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