

Mick Mulhern  
Interim Chief Executive  
OPDC  
City Hall  
London SE1 2AA

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21 September 2018

Dear Mick,

**Re: Objection to GLA HIF Bid for Old Oak Common**

I am writing in response to your letter of 11 September.

As you know the OPDC has repeatedly refused to share the details of the HIF bid with us (including subject to a non-disclosure agreement). Even at the meeting on 13 September you confirmed that anything shared with us would be heavily redacted such that we could not properly understand or interrogate that detail.

You verbally confirmed that OPDC's HIF bid does indeed include money for land purchases, including the potential compulsory purchase of some Cargiant land, despite previous repeated assurances from yourself to the contrary. You are aware that this is of deep concern to me, particularly given the operational implications for Car Giant arising from OPDC's current proposals, their indicated location and the proposed timing of their provision.

It is with great regret that OPDC's position has left us with no option but to formally object to the HIF bid in its current form. I enclose a copy of the formal objection letter we have issued to MHCLG and other parties involved in considering the submission.

I should correct the point in your letter that states we intend to vacate our current site in late 2022. That was indeed the original intention when we started working with the OPDC three years ago on the basis of agreeing a comprehensive Masterplan for our land and the submission of a planning application including under a PPA. However, despite initially positive meetings and engagement with yourself and your officers during this process, our ability to progress our proposals to that timeframe has been frustrated by a lack of clarity from OPDC on key infrastructure fixes. We were suddenly told in November 2017 that all of the assumed infrastructure fixes would change and that 'the world had moved on'. You will appreciate that this has resulted in a considerable amount of wasted planning work and delayed our ability to progress our relocation.

You further commented at our meeting on 22 August that the OPDC never believed the scheme we were progressing was viable. Whilst I expressed my frustration that this was never communicated to us through the

entire time of our apparent joint working, we do not consider it to be a correct representation. Our proposals are deliverable and viable.

I have explained to you, including at our meeting on 22 August, that we no longer believe vacating the site in late 2022 to be possible given the delay that has arisen progressing matters with OPDC, and the enclosed HIF objection letter explains clearly why this is the case.

As you know our relocation requires extremely careful planning to bring into line the many leases we have on parts of our land and to complete the plans and building out the relocation site. A viable planning permission for our landholdings is also required to make the further investment of in excess of £400m for the relocation to be commercially viable. The timing implications of early interference under OPDC's HIF proposals with our operational land would lead to operations being virtually impossible and could lead to the extinguishment of our business – this interference to our business has led to serious questions around future planning work and for the relocation frustrating both our operations and ability to relocate. The other businesses on our site also need to plan carefully for their own relocation.

None of that is possible whilst the OPDC is pursuing a strategy in complete isolation of ourselves as landowner which proposes the early loss of 7 plus acres of land which is crucial not only to the continuation of our business, but also to maximizing the future viability and best possible place making of a comprehensively planned scheme.

We have already issued to you a complete note explaining the operations of all part of our business and a survey of all daily car movements to and from the different parts of our business as well as comprehensive and numerous additional technical reports and information. None of this appears to have been taken account of in any way, nor any alternatives seriously considered. We have shown a number of alternative, deliverable options that do not necessitate early interference with our land interests or operations. Further, those are options that can deliver considerably better and more comprehensive placemaking and masterplanning without having the adverse impacts of your current proposals.

Your letter makes the offer of sending over 'detailed infrastructure design work'. This makes it completely clear that to date there has been no joint working with Cargiant as this work is already complete and submitted as part of your HIF submission. OPDC's position appears pre-determined in this regard.

I do not wish to be in a position of opposing OPDC, and would prefer that we could progress together alternative options to your current proposals and timeframe, which have forced us into a position of objection. We strongly wish to establish a working approach with you that is open, transparent, and collaborative. It is not acceptable to withhold the details of essential information that detrimentally affects both Cargiant operations, ability to progress planning

applications on our existing site, and continue land assembly matters for our relocation. I am fully prepared to have further meetings with OPDC, and to work with you to secure the best outcomes in planning terms, and which also allow for our successful relocation and are sensitive to the needs of the many businesses on our site. In the interests of impartiality and rebuilding a strong working relationship, I would suggest the involvement of a third party which I believe should be either Homes England or MCHLG.

As our HIF objection letter made clear, if we are required to do so to protect our operations, we will use our full resources to fight any attempt to CPO Cargiant land.

The OPDC's current proposals set us down that path, which cannot be in the public interest nor that of OPDC or ourselves. It will simply frustrate the delivery of homes and jobs, which I think we would both agree we should look to secure through joint working and proper examination of alternatives to your current proposals.

The HIF bid timeframe realistically cannot be met without serious harm to our business, other businesses. Furthermore the land take you propose will impact the viability of the remaining 39 acres outside your proposal.

I am hugely frustrated to be in this position, despite years of co-operation with the OPDC on our part, huge investment of over £200m made by trusting the OPDC's intentions and willingly attempting to bring forward the relocation of our business and comprehensive masterplanning of our site.

Yours sincerely,



**Geoff Warren**  
Owner, Cargiant

CC to:

- Liz Peace, Chair, OPDC