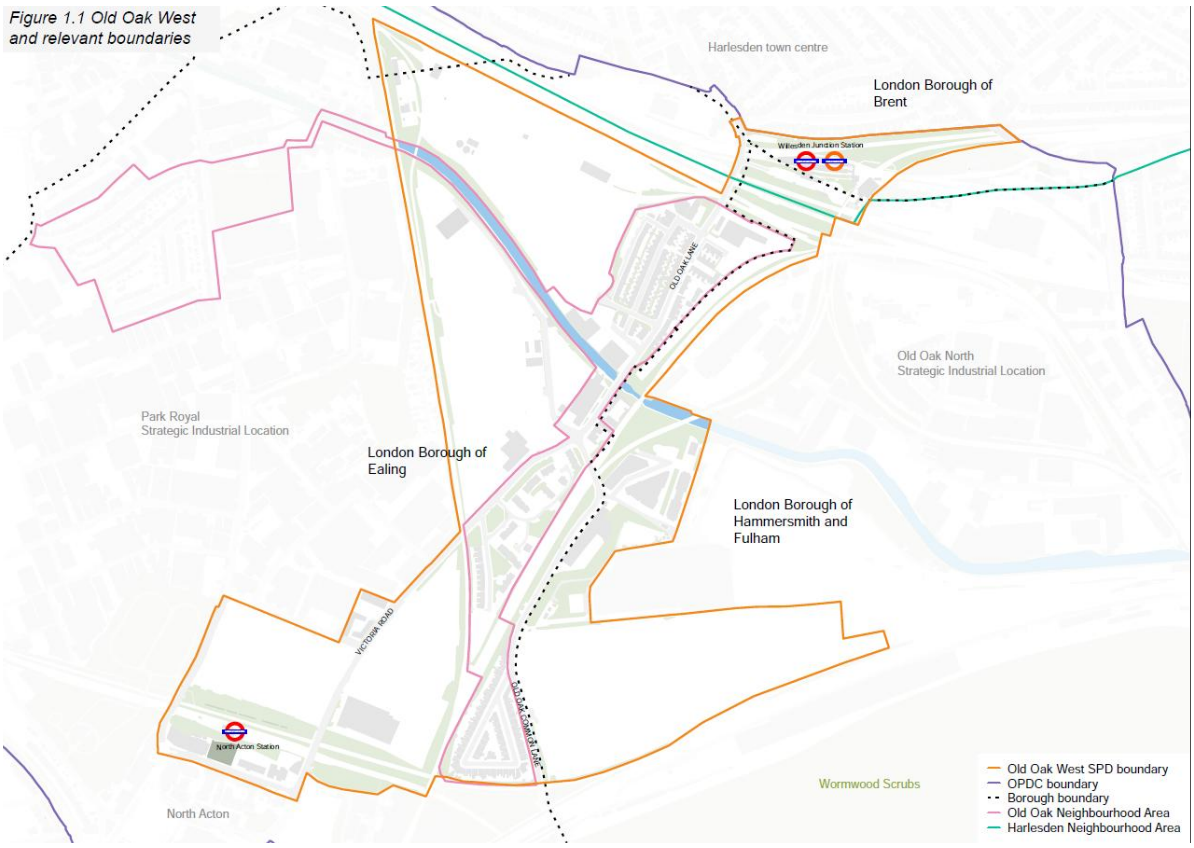
THE OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION (OLD OAK) COMPULSORY PURCHASE ORDER 2025: COMPULSORY PURCHASE OF LAND AND NEW RIGHTS IN OLD OAK

OBJECTION FROM THE OLD OAK NEIGHBOURHOOD FORUM

This objection to the CPO Order made by the OPDC on September 12th 2025 is submitted by the Old Oak Neighbourhood Forum. This body was designated by OPDC in 2017 and has a membership of 150 local residents and several businesses in the OPDC area.

The neighbourhood area (designated by OPDC at the same time as the forum) maps fairly closely to what has subsequently become the 'Old Oak project area' and the area covered by the CPO Order. This was not an expected outcome at the time of 2017 designation, when OPDC was focused on delivering a first phase of new development at 'Old Oak North' on the 45 acres of land held by Cargiant Ltd.



Pink line show boundary of designated OPDC neighbourhood area See at www.oldoakneighbourhoodforum.org for background.

The Forum works alongside two other neighbourhood forums in this part of London, and several residents associations. These 8 bodies have nominated representatives who now serve on an OPDC Residents Panel recently established by the OPDC Board[1]. The Forum has been involved in consultation on each of three iterations of the OPDC Draft Local Plan (adopted 2022) including the Examination Public and more recently with the preparation of OPDC's 'masterplan' and the initial stages of the CPO Order. Open meetings of the Forum are held monthly on Zoom.

Relationships with OPDC have been adversarial at times. The Forum has made several submissions to the London Assembly's Budget and Performance Committee and to its Planning and Regeneration Committee, seeking a formal review of OPDC's plans and track record since establishment of the MDC in 2015.

Dialogue between local people and OPDC has improved to an extent since Dame Karen Buck took up her appointment as OPDC Chair on 1st January 2025. However, a running theme of this objection is a lack of transparency of OPDC decision-making coupled with a lack of external scrutiny. The sole review of the OPDC to date was in 2016, in the early period of the current Mayor of London's administration.

We are not opposed to plans for regeneration at Old Oak West. The existing residential enclaves in the area are fragmented and lack facilities, with poor levels of access to public transport. We are very disappointed that early ambitions to create one of Europe's most successful examples of urban renewal are to date falling far short of being realised.

We are objecting to this CPO Order for the following main reasons:

- OPDC's 'strategic aim' of proceeding 'at pace' risks creating a scenario in which very high density housing will be built out at Old Oak in advance of necessary transport infrastructure – with the possibility that this infrastructure may never arrive.
- Public funds are being expended prematurely in the Opportunity Area on land referencing and preparation of a CPO Order at a time when the timeline for the completion of the remaining HS2 project is unknown. Implementation of the Order will add to these costs.
- Similarly unknown is whether the opening of Old Oak Common station will in reality prove to be a 'catalyst' for driving 'transformational' regeneration at Old Oak. The claim of transformational change continues to be promoted (in our view unjustifiably) even when the HS2 project bears no relation to the original

[1] These organisations now participate in a formal OPDC Residents Panel established by OPDC in July 2025 with the aim of improving dialogue between the Development Corporation and local people. See at this OPDC set of minutes of the first meeting of the Panel..

plans and has become 'an appalling mess'[2] with a timeline which may well extend 15-20 years beyond the original 2026 opening date for HS2.

In this context, we do not see the OPDC Statement of Reasons as making *a compelling case in the public interest* for a CPO Order prior to the outcome of the HS2 reset. This form of intervention by OPDC is in our view unduly hasty, misguided and unjustifiable. We are therefore asking the Secretary of State to consider with due care the material covered in this detailed objection.

In structuring our objection, we have focused on those parts of the MHCLG 2025 CPO Guidance which sets out specific expectations on the use of CPO powers by Mayoral Development Corporations. Certain sections of this Guidance are referred to in the OPDC Statement of Reasons (at paragraphs 6.1 and 6.2). **Other sections are not rehearsed or addressed in the OPDC Statement of Reasons.** We see this as a significant omission.

Before doing so, we set out our concerns on the initial process through which the Mayor of London authorised the making of the CPO Order.

Mayoral authority for the CPO Order

The OPDC Board at its July 10th 2025 meeting gave wide delegated authority to OPDC officers to take the next steps in finalising and progressing a CPO Order. A Mayoral Decision report (MD 3406) was prepared, with an OPDC officer as the 'Drafting Officer' and a GLA officer acting as 'Sponsoring Director'. This report was signed off by the Mayor's Chief of Staff and the GLA Chief Finance Officer.

This report was included on the agenda of a Mayoral Delivery Board on 11th August 2025. This body is not a committee of the GLA and operates on the following basis: *Meetings of this internal officer-level Board are not held in public and are only open to those invited to attend by the Chair of the Board*. The minutes record the attendance of several Deputy Mayors as well as officers. The decision was that *MD3406 be approved in principle for formal approval by the Mayor* (standard wording). No details of any discussion, nor even the title of the report, are included in the minutes of this Board meeting

In the report itself, little or no mention is made of the impact of the HS2 reset on OPDC delivery plans, despite a section on *Key Risks and Issues* at paragraph 4.1.

The closest that the report gets to addressing the consequences of the HS2 reset is to say at 2.1 *The recently announced delay to the completion of HS2 will have some impact on the overall timing for the completion of the regeneration of the Order Land.*

---

[2] Terminology used by Secretary of State Heidi Alexaner in her June 18th statement of Parliament

However, this will not impact on the early phases which will be built out on land which is not required for HS2.

In our view, this report MD3406 ignores the real world context of the HS2 reset and its implications for the phasing of building out new housing developments around the Old Oak Common station site. The HS2 reset is not a minor adjustment to one of the UK's most expensive infrastructure projects. It is a rethink of whether a project that has gone wildly off-track can be rescued at an acceptable cost and with a very different timeline.

The report MD3406 makes the case for a CPO Order on the back of the OPDC Outline Business Case and the set of 'strategic objectives' identified in this 2023 document. These objectives are described at paragraph 2.2 as *underpinning the rationale for the Old Oak project*. The fifth of these objectives is to *deliver at pace – ensure development is well under way by the time Old Oak Common station opens (between 2029 and 2033)*.

No attempt is made in this Mayoral Decision report to recognise the reality of the post June 2025 position on the HS2 project. The Secretary of State's statement to Parliament on 18th June included the following comments:

- *years of mismanagement and neglect have turned HS2 into a shadow of the vision put forward 15 years ago.*
- *we've started the year long task of fundamentally resetting the project*
- *(*Mark Wild as the new HS2 CEO*) has stated, in no uncertain terms, the overall project with respect to cost, schedule and scope is unsustainable.*
- *Based on this advice, I see* ***no route by which trains can be running by 2033 as planned*** (our emphasis).

It can be assumed that the Deputy Mayors (and officers) attending this Mayoral Delivery Board were aware of the content of the highly publicised June 18th announcement on the HS2 reset. But decisions on launching a 31 hectare CPO Order are not trivial and have a real impact on peoples lives. The public are entitled to expect that any report recommending the course of action of on a CPO at Old Oak will explain the main relevant considerations with accuracy. It is also reasonable to expect that minutes of a meeting will summarise the rationale for a decision and demonstrate that relevant matters were considered. Neither of these basic requirements of governance were met in this case.

No explanation is given in the report of **why** it makes sense *to* ensure *that development is underway before OOC station opens*? The station was originally due to open in 2026. There are no updated forecasts of passenger numbers using what has since 2023 been dubbed the 'Aston to Acton shuttle' (see further below). The start of tunnelling for the Old Oak connection to Euston has been delayed until 2026, with no designs in place for a terminus at Euston and hence no clarity on the length of time OOC station may act as a terminus.

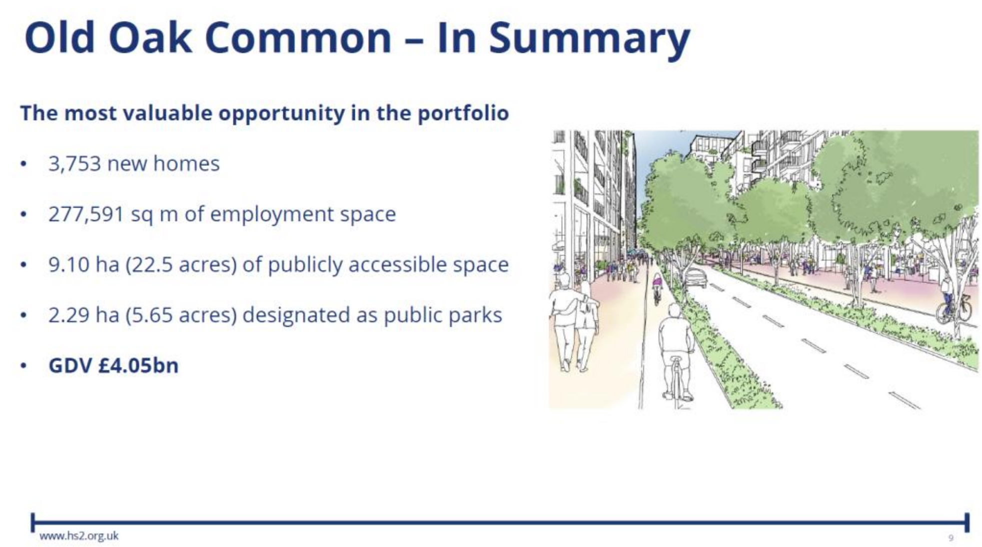
Seeking authority from the Mayor to make the CPO Order was an action taken by OPDC officers under delegated powers, following decisions made by the OPDC Board on 10th July 2025. The Order was 'made' by the OPDC's Executive Director of Delivery on September 12th, under the same delegation.

September 12th was only 6 days before the agenda and reports were published for the Board meeting on September 25th. This Board meeting would have provided an opportunity to reflect on the justification for launching the CPO at once, or pausing until the outcome of the HS2 reset is either definite or has become clearer. This option was not even considered, either by the OPDC Board or by the Mayoral Delivery Board.

Waiting 6 days would also have enabled the public to ask the Board to reconsider what appears as an unduly hasty decision made on July 10th. **The officer reports involved, and the final Statement of Reasons for the Order, still misrepresent (significantly) the likely timeline for Old Oak Common station to become operational.** Paragraph 6.32(c) of the Statement reads *Progressing the Order now should ensure that a recognisable and attractive place is established by late 2030 to coincide with the opening of the Old Oak Common Station.* We had assumed this wording would be updated from the Draft Statement on the 10th July Board agenda. A date of 'Late 2030' has never been a forecast date for the opening of OOC station, 2029-33 having been the previous official timeline now recognised as unachievable.

The fact that OPDC has acquired (or now controls) a number of potential development sites at Old Oak, not already in use as HS2 construction compounds, does not justify proceeding 'at pace' in delivering a masterplan that remains dependent on the HS2 project as the central driver of 'transformational regeneration'. The timelines for release of HS2 compounds for development were once clear, with HS2's Commercial Division having undertaken detailed planning on potential uses and forecasting a Gross Development Value of £4.5bn. This 2022 analysis is now history (see HS2 slide overleaf).

As of late 2025, there may well be other Opportunity Areas amongst the 47 across London which now have a better business case for Government and Mayoral support. There are OAs where new transport infrastructure is either already in place, firmly committed, or has greater certainty of coming into use as compared with Old Oak. Current work on the new London Plan should identify such prospects.



Concluding slide of a HS2 presentation to Andrew Slaughter, MP for Hammersmith on 26th August 2022

The Old Oak project area has no new transport infrastructure committed, other than OOC station itself – with even this being no longer a 100% certainty at a time when the business case post 'reset' may prove unviable or unaffordable when assessed against other key national infrastructure priorities.

Plans for two new Overground stations, once seen as essential in making Old Oak Common the *best connected location in the UK* have fallen off the agenda (in the case of Hythe Road) or are now dependent on a successful business case being made by London Transport for the West London Orbital route (consultation stage due in 2026).

There are no firm and funded plans for improved transport infrastructure in the Old Oak project area, in terms of the congested road network or public transport. The 2015 OPDC Strategic Transport Study has been in a process of updating for several years, with no forecast publication date available[3]. Constant changes to the HS2 project have required fresh modelling. The evidence base for an *estimated 250,000 passengers each day passing through OOC station*[4] (a metric which continues to be claimed by HS2 on its website) has not been revised since 2015.

Does the OPDC Statement of Reasons meet the expectations in MHCLG Guidance?

Our comments below relate to specific paragraphs in MHCLG Guidance on CPOs as updated in January 2025.

---

[3] This study formed part of the evidence base for the 2018 submission version of the 2022 OPDDC Local Plan, but is the same as the 2015 study with a different date on the cover.

[4] This figure continues to be quoted on the HS2 website and used by OPDC. HS2 continue to use the term *unrivalled connectivity* for Old Oak Common but have never provided any metrics to support this claim.

These relevant paragraphs are not restated or addressed directly in the OPDC Statement of Reasons. We have highlighted wording of relevance to this CPO Order.

Paragraphs 158.4 and 158.5 of the Guidance

158.4 It may be counterproductive for a Mayoral development corporation to predetermine what private sector development should take place before land has been assembled. Land will often be suitable for a variety of uses and the market may change rapidly as implementation proceeds.

158.5 Nevertheless, when using its compulsory purchase powers, a Mayoral development corporation will be expected to show there is a compelling case in the public interest for the compulsory acquisition which is supported by reasonably firm proposals or a long-term strategic need for the land and a clearly defined objective which is supported by the planning framework for the urban development corporation area.

While OPDC has identified *clearly defined objectives,* this does not mean that they will prove to be the most successful ones for the Opportunity Area, in the long term. The impacts of the OOC rail interchange, when potentially in operation over a decade away, are highly speculative as of now. Meanwhile early new residents at Old Oak are already experiencing the consequences of living in high-density car-free housing, in a scheme of 605 units consented by OPDC in 2016 on the basis of a 2026 date for opening OOC station.

There are other options for creating a genuinely successful and sustainable 'new part of London' at Old Oak, matching the 2015 ambitions of the MDC to achieve a world leading exemplar of urban renewal. These need to be assessed before a CPO Order at Old Oak is put into effect.

The OPDC 2022 Local Plan set planning policies for a set of 'Places' within an area rebadged as 'Old Oak West' during the course of Examination by a Planning Inspector. The Local Plan was adopted in June 2002, nearly four years after its October 2018 submission. The Inspector's Interim Findings in September 2019 led to a change of direction and a 'new focus' by OPDC, announced three months later via a press release in December 2019. This led to loss of confidence amongst local residents, in the quality and transparency of OPDC's planning processes.

The subsequent Old Oak West SPD sought to demonstrate some coherent spatial identity for this 'new area of focus', badged in 2019 as the 'Western Lands' in east Acton. This location for initial development had not been 'Plan A' for the MDC in its first four years.

Some (but not all) of the development sites now proposed in OPDC's 2024/5 master planning work featured in the 2022 Local Plan, as specific Site Allocations for housing. Some (but not all) are identified as being suitable for Tall Buildings (a 2021 London Plan requirement). As sites come forward to application stage, there will be challenges over whether the new Masterplan (and any individual application) meet 2022 Local Plan policies.

In terms of the likelihood of *'rapid change in the market'* **we see this as a primary reason why progressing and implementing a CPO Order in 2025 and 2026 would be misguided**. As local residents, we (and the wider public following OPDC Board deliberations) are repeatedly told by OPDC that that all is well in terms of investment interest in this part of London, with HS2 making claims of a '£10bn development boom'. We find the evidence, in the form of consultancy work commissioned by HS2, to be unconvincing. Whereas the nearby White City Opportunity Area and Innovation District can demonstrate real progress on the ground.

The report on Delivery to the OPDC Board on September 25th refers (at 3.2) to *strong market interest recognising the potential for transformative change and a partnership with a Mayoral development corporation was considered an attractive proposition*. This e report also refers to *the two periods of detailed market engagement undertaken at the end of 2024 and during early 2025*.

Both these periods of 'market engagement' predate the June 2025 announcement on the HS2 reset. We have to take on trust the advice from OPDC officers to the July and September meetings of the OPDC Board that interest from developers remains strong, when the date for trains to start running to and from at OOC station (HS2 or Elizabeth Line/GWR) **is now a complete unknown.**

Other evidence, across London, is that much activity on new housing development has ground to a halt with a growing number of stalled schemes. A Mayoral change of policy to reduce the fast track threshold of 35% affordable housing, in an effort to restore viability to stalled or planned developments, has been signalled this week. The regular OPDC Development Management update and quarterly Performance Report at the September 2025 Board meeting show housing completions slowing to a trickle.

This is London-wide (and national trend) but it adds to our questioning of 'why now' and 'why at pace' in relation to OPDC's delivery plans and the CPO Order? There should at least be a public airing of these issues.

Paragraph 159.4 of the MHCLG Guidance

159.4 In all cases, Mayoral development corporations will be expected to:

(a) provide evidence to support the case for the acquisition in the context of its development strategy

(b) demonstrate there is a compelling case in the public interest for exercising compulsory acquisition powers and that there is a real prospect of the land being brought into beneficial use within a reasonable timeframe

(c) where impediments are yet to be resolved or overcome, show why compulsory acquisition is necessary at that point in time to maximise the opportunities which exist for the regeneration of the relevant Mayoral development area, explain how the use of the powers would help promote the achievement of the Mayoral development corporation objectives, and show that the implementation of the scheme following the confirmation decision being made is unlikely to be blocked by any physical or legal impediments

(d) evidence why it has not been possible, or would not be practicable, to secure the commitments of the landowner for the regeneration of the relevant land in accordance with the objectives and timescales of the Mayoral development corporation without the making of a compulsory purchase order or otherwise securing the acquisition of the land by voluntary agreement.

A large part of the Statement of Reasons for the CPO sets out what is viewed by the OPDC Delivery team as the MDC's 'development strategy'. This rests on the OPDC Outline Business Case and its 'strategic objectives', on the OPDC Regeneration Strategy and on the Illustrative Masterplan work which has been undertaken between the delivery team and their consultants in the past 2 years.

Paragraphs 6.42 onwards of the Statement of Reasons cover *Planning Status*. The content skirts round the fact that the Illustrative Masterplan has departed quite significantly from the spatial plan in the adopted 2022 Local Plan. The originally proposed location for a 'major town centre' has shifted from Atlas Road/Channel Gate, towards Acton Wells and a key focus on the proposed bridge between OOC station and Acton Wells, leading through to North Acton.

This may prove to be a more realistic spatial plan (given changed HS2 timescales requiring lengthier retention of their Channel Gate compound for works at Euston). **But it is not the adopted development plan.** OPDC has gone to some lengths to place on the record the fact that these variations or 'departures' from the Local Plan will prove acceptable in terms of policy compliance. Minute 5.7 of the Planning Committee on 19th June 2025 *states The amendment to paragraph 6.2 of the committee report, which should read as follows:*

Overall, when assessing the Illustrative Masterplan as a whole, and taking account of the benefits of the scheme, which will be confirmed at a later date, the proposals contained within the Illustrative Masterplan ***are capable of being in accordance with the Local Plan****, when the development proposals are considered in the context of future planning applications (our emphasis).*

This conclusion has been reached by OPDC planning officers and follows a series of pre-application meetings on the Illustrative Masterplan. The content of these discussions remains confidential to OPDC, with one part of the Development Corporation talking to the other. The public (and landowners/potential developers) will not have access to the records of these pre-application meetings until such time as a OPDC planning application for the overall Masterplan (or a new individual application from a developer) is determined.

This means that the conclusion that the new Illustrative Masterplan is *capable of being in accordance with the Local Plan* **has yet to be put to any public test**, as a development management proposition. The planning team at OPDC (referred to by the Delivery team as 'the LPA') are in the early stages of revising and updating the 2022 Local Plan. This exercise may bring a refreshed Local Plan more into line with the Masterplan, subject to a successful Examination**.** This is a further reason why delay in finalising and implementing a CPO Order would make sense. **Currently it is not evident that the CPO Order conforms with OPDC's development plan,** if this is what is referred to by the term 'development strategy' at 159.4(a) of the MHCLG Guidance.

Para 159.4(b) of the Guidance does not define what is a *'reasonable timeframe'* for *'land to be brought into beneficial use' v*ia a CPO**. Our contention is that the full picture on what will prove to be 'beneficial' will not be apparent until the impact of an operational OOC station is known. The position will however become clearer in mid to late 2026, when the outcome of the HS2 reset is known**.

Para 159.4(d) includes wording which we see as significant. This reads *show why compulsory acquisition is necessary at that point in time to maximise the opportunities which exist for the regeneration of the relevant Mayoral development area*.

We accept that OPDC has acquired (or now has control of) some 90% of the land that the Delivery team see as needed for their Masterplan. At '*this point in time'* in October 2025 we see no *compelling case in the public interest* for embarking on use of CPO powers, until the huge uncertainties surrounding the central driver of the MDC's aspirations (and the original raison d'etre for establishing a MDC in the first place) are resolved.

Previous history of OPDC masterplanning and attempted use of CPO powers

As local residents, we feel we have been here before. In 2017/18 OPDC prepared a quite different masterplan (for Old Oak North). This also made extensive use of consultants (AECOM in that case, Gort Scott and others in 2025). This exercise reached the stage of Land Referencing, using further consultants, and caused much anxiety to small landowners/lessees potentially affected. As the major landowner at threat of seeing key areas of its business space removed unilaterally, Cargiant Ltd withdrew its support and made very public their views that OPDC's proposals were financially unviable, even with use of £250m of Housing Infrastructure Funding.

Following extensive (and expensive) EIP hearings, Planning Inspector Paul Clark concluded that this part of the submitted Draft Local Plan was not viable. Over 400 major modifications were then made, to enable OPDC's 'shift of focus' to the Western Lands to be incorporated within a Post Submission Modified Draft Local Plan. This revised version was the subject of much local debate, with local neighbourhood forums in the area making extensive written and oral representations at renewed Examination hearings.

This episode of the abandonment of the plans for Old Oak North and the relinquishing of MHCLG's award of £250m of Housing Infrastructure Funding is documented in the GLA Budget and Performance Committee report published in January 2021. Abortive expenditure of £6.162M on 'supplier costs (consultants and legal advice) were discussed at the OPDC Audit Committee on 20 March 2020. As noted above, the MHCLG letter setting stringent conditions (including deadlines) for the use of the £250m of Housing Infrastructure Funds was published by OPDC years after the event[5].

Parallels with the 2017-19 period of OPDC activity are part of the cause of current local concerns over OPDC's insistence in progressing 'at pace'. On the Illustrative Masterplan, the process has at least been more transparent (the AECOM masterplan for Old Oak North was never consulted on). But this time round, the timing of proposed delivery of development by OPDC is even more out of sync with the unknown timeline for a (truncated) HS2 project.

There is substantial risk that the type of very high density car-free developments that are built out will prove wholly inappropriate to an area where public transport has not improved (a scenario which could last for 5-10 years or indefinitely). The London Assembly's Planning and Regeneration Committee wrote to the Mayor on June 20th with recommendations and points arising from their own evidence hearings on the *Towards a New London Plan* consultation. The last of their points was on *Infrastructure-first development*, raising the committee's concern that housing will be developed without

[5] The documentation on the HIF bid was eventually published on the OPDC website at this link on OPDC – Sharing our Information. The conditionality letter from MHCLG was sent to OPDC on 9th April 2018 but not reported at the time. Cargiant Ltd withdrew its support by letter on 21st September 2018. The OPDC Board met shortly afterwards on 28th September. The London Assembly Budget and Performance Committee obtained copies of the MHCLG conditionality letter and other HIF documentation after a formal legal summons, when preparing its 2021 report referenced above. It has never been clear when OPDC Board members were made aware of Cargiant's withdrawal of support. The OPDC HIF bid had been submitted by officers 8 days before the Board meeting on September 18th, which endorsed this action, approved the start of Land Referencing at Old Oak North, and approved submission of the Draft Local Plan to the Secretary of State. All three of these major decisions were to prove premature and/or unwise, resulting in years of delays on the Local Plan and abortive work and expenditure by OPDC.

the infrastructure to support it, both transport links and utilities such as water and electricity.

The relevance to the CPO Order of the OPDC Outline Business Case

OPDC's Outline Business Case to Government (OBC) followed on from a Strategic Outline Business Case (SOBC submitted in February 2022 and given in principle approval in April 2022). The Government departments involved were DHLUC (now MHCLG) and DfT along with the agencies Homes England and Network Rail.

An initial version of the OBC was submitted to Government in August 2023[6]. A Version 2: revised December 2023 was published recently on the OPDC website (under *Sharing our Information*). Our Forum had been requesting sight of a copy since March 2024[7] and were told that the process of making redactions was taking time.

It has been helpful to see the document. It provides more clarification of how the MDC intends to go about securing one or more development partners and entering into a Joint Venture arrangement to deliver the developments proposed in the Illustrative Masterplan.

Preparation of the OBC has been under the oversight of a Strategic Steering Group chaired by the Infrastructure Projects Authority. For the public, this steering group is an opaque body, publishing no papers.

What is also clear is that the Business Case has been prepared and is premised on completion of the HS2 project and opening of OOC station in the period 2029-33. The List of Preparers of the OBC has Arup as Lead Author, with Deloitte and Mott McDonald as Strategic Development Advisers and Gort Scott as Capacity Study Lead Consultant. Gort Scott have also been leading the master planning team.

The revised December 2023 OBC includes this paragraph below:

No further irrecoverable grant funding is expected to be needed from the Exchequer. However, further public sector recoverable funding (£100-400m) could be required to support land assembly and infrastructure delivery. This scale of recoverable funding is plausible based on recent precedents from likely sources of public sector finance. This OBC is not seeking an investment decision from DfT, and no future investment from DfT will be required to deliver the housing and regeneration elements of this project.

---

[6] A copy of redacted minutes of the Government Strategic Steering Group of 19 September 2023 (obtained via an information request) record that *[ ] gave update that DfT had rejected the OOW OBC and that further communications would be sent out on next steps*. It is notable that the revised OBC makes no request for DfT funding.

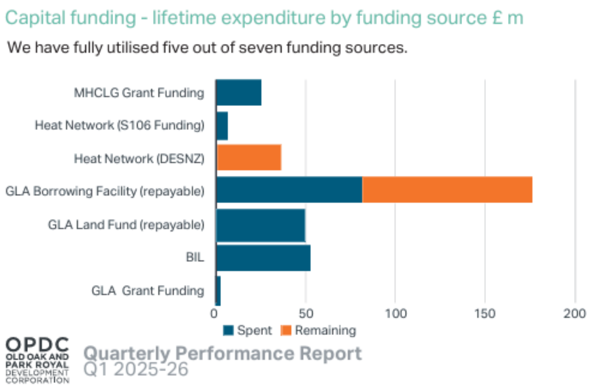
[7] An OONF letter of 29th May 2024 to OPDC CEO David Lunts sets out a series of questions on the OBC along with his responses.

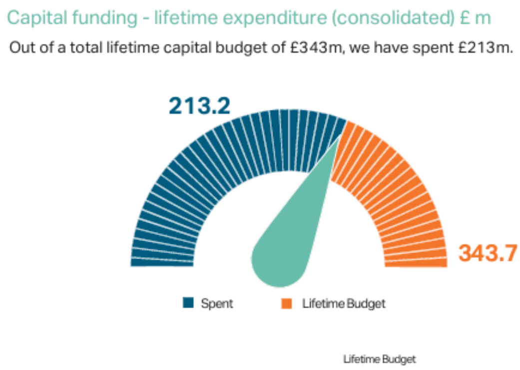
Will OPDC have the necessary funding to carry through the acquisitions proposed in the CPO Order?

OPDC's CPO proposals in 2018/19 at Old Oak North foundered because the Planning Inspector reviewing the 2018 Draft Local Plan concluded that the funding was not there to make the necessary compensation payments to Cargiant Ltd and other parties. This was despite Government support in the form of £250m of Housing Infrastructure Funding. Might a similar scenario re-occur on the Old Oak project?

The minutes of the 10th July 2025 Board record that *Officers were satisfied that there was sufficient funding from the Greater London Authority and the Government for purchases*. OONF has been advised by the Executive Director of Delivery that *OPDC has access to a total of £309m funding to support land assembly. This includes a total of £78.9m funding from MHCLG, £50m from the GLA Land Fund, £175m in loan funding from the GLA and an additional £5.5m which has been secured from other sources such as section 106.*

The quarterly performance report to the September 25th Board gives a slightly higher figure of £343.7m for the consolidated 'lifetime capital budget' of the MDC, noting that '*we have spent £213m*'. The largest element of this capital budget is a GLA Borrowing Facility and is repayable.





It is clear that OPDC is taking on sizable debt obligations in terms of repayable loans. We recognise the Board members (and the Board's Audit and Risk Committee) are monitoring the position regularly.

The minutes of the July 10th Board meeting record the following points, arising from discussion on the quarterly financial report:

The Board's attention was drawn to the impairment figure of £33m. This is a technical accounting adjustment to value any property acquired on a current use value basis as a stand-alone site, and this did not take into account any compensation or other payments related to making an acquisition in the shadow of a compulsory purchase order. Jules Pipe CBE, who was not attending the meeting, had sent the following *comment: 'I note the impairments on the assets we have acquired, although these appear to be broadly in line with similar impairments faced by other housing and regeneration agencies – not least the GLA – and I am content with the explanations for them. I remain confident that as our plans come to fruition, and we achieve a comprehensive redevelopment of Old Oak, we will see a combination of commercial and social returns that fully reflect the underlying value of the sites we have acquired.'*

As London residents, paying the GLA precept, we did not find it entirely reassuring to hear that the GLA regeneration agency (which we assume to refer to GLA Land and Property Ltd known as GLAP) is experiencing high levels of impairment. GLAP is the Greater London Authority's commercial subsidiary for property investment, development and asset management. The company has had audit questions asked about its ability to keep track of loans made, and a £300m liability owed to the Greater London Authority inherited when GLAP was formed in 2012[8].

OPDC makes available only limited information on its land and property acquisitions and has advised us that *Our priority remains to ensure that the appropriate level of information relating to land acquisitions is placed in the public domain, whilst taking care to protect OPDC's commercial interests and the commercial confidentiality of local landowners.*

A map of which sites have been acquired (or are now controlled via Special Purpose Vehicles or OPDC shareholdings) is published and updated regularly by OPDC. This (minimal) information is helpful for local people trying to understand and keep track of the MDC's plans. Via the commercial property press and Land Registry data it has proved possible for our Forum to build a relatively full picture of the Land Assembly portfolio now held by the Corporation.

This portfolio includes substantial development sites at Atlas Wharf and Old Oak Wharf, allocated for housing in the 2022 Local Plan, which have been purchased or taken over by OPDC from developers who had already gained planning consent (in one case) or has plans at advanced pre-application stage (in another). These purchases in 2024 reflected appropriate valuations (we are told). They were made prior to the June 2025 announcement of the HS2 reset and consequent delays. It would seem reasonable to assume that valuations have dropped back since then, as been the case for housing prices in many parts of London.

The OPDC Outline Business Case refers to *bringing the private sector on board* via the selection of a Master Development Partner. In the case of these two sites private developers have already been 'on board', have drawn up housing schemes, and have chosen to get offboard in 2024. They may now be relieved *not* to be building out these developments after news that OOC station has been delayed for a further 5-10 years.

---

[8] See at Sadiq Khan's London housing fund may need bailout, auditors warn Financial Times

We have concerns that when sharing of risk and reward, in any joint venture structure, the MDC will find itself under pressure for the public sector to take on a higher share of risk and less reward than would have been the case assumed in 2023/4 when the OBC was prepared and approved by Government.

We do not see how significant land value gains will become available to OPDC in the next decade, even when undertaking the ‘comprehensive and co-ordinated’ approach set out in the Outline Business Case? If we are wrong in this, we hope that a Public Inquiry on the CPO Order will provide a forum at which the general public at Old Oak can gain a better understanding of the OPDC’s overall strategy.

In terms of the six ‘asks’ in the OBC we have no problem with the principle that OPDC will be lead delivery agency for the Old Oak project, nor with a ‘patient capital’ approach. In the context of the CPO Order our concern is simply that the analysis in the December 2023 OBC has been overtaken by the June 2025 announcements on the HS2 reset and hence needs re-assessment by all parties involved.

The figure below, setting out ‘delivery phases’ assumes *‘HS2 station opening c2026-2030).* This timeframe is now up to a decade further away (or possibly even more) depending on the outcome of the HS2 reset.

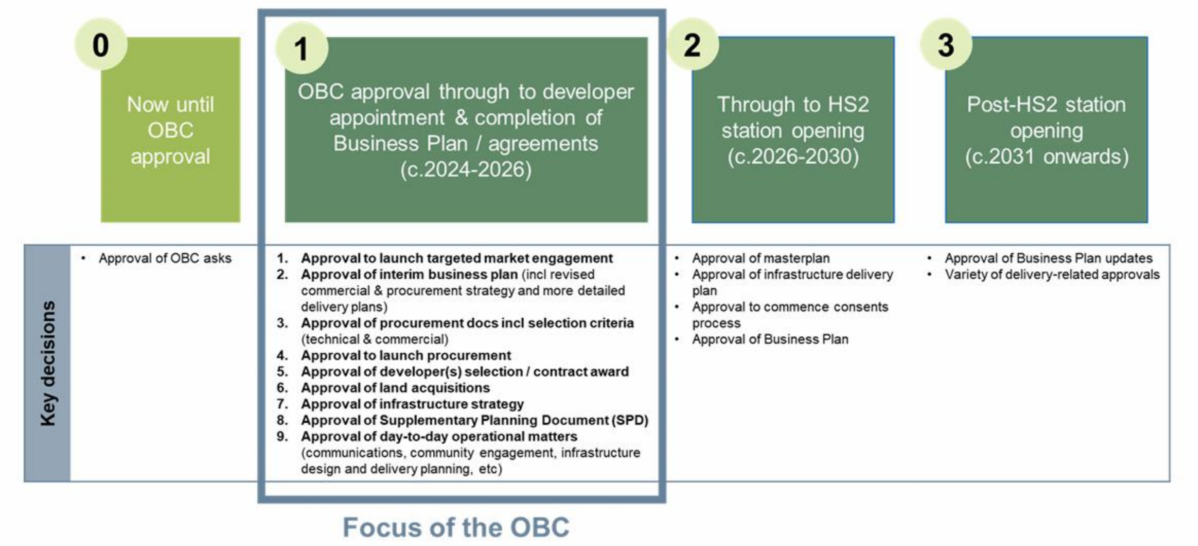


Figure 55 Key decisions by delivery phase

Timing of implementation of a CPO Order

We have noted the content of the Deloittes report on ‘Market Insights’ at Appendix 16 to the OPDC Outline Business Case. Prepared in August 2023 the document is already outdated and does not reflect continuing falls in investment interest and financial viability of large-scale housing developments in London. Nor does it reflect the increasing problems of finding Registered Social Landlords willing to take on the affordable housing elements of consented major housing schemes (an important issue for OPDC given is ambitions for ‘a new Old Oak’). But it does explain, in language understandable to a lay audience, some of the elements of OPDCs approach to delivery.

These paragraphs below seem to us to be relevant to the timing of a CPO Order. The OPDC Statement of Reasons covers this subject at paragraphs 6.28 onwards. We question the merits of the assertion at 6.29 of the Statement that *OPDC requires certainty about the availability of the outstanding interests in the Order Land in order to provide confidence to potential development partners that the Order Land will be available to enable delivery of the Regeneration Proposals. This is the main reason why the Order is being pursued in advance of the making of an application for planning permission.*

We do not see this as a 'compelling' argument in the public interest. In our view, potential development partners negotiating on a Master Develop Partnership will be more interested in trying to second guess the outcome of the HS2 reset. Having a CPO in place may prove a relatively minor factor for prospective development partners, compared with the outcome of the reset (albeit that current uncertainty may provide those developers with commercial leverage to offset risk onto OPDC).

The Deloittes report states as below:

Old Oak West is one of the most significant development opportunities in the UK. There is the potential to deliver a truly transformational mixed-use redevelopment, building upon the investment in a new High Speed Two ("HS2") / Elizabeth Line interchange at Old Oak Common.

Services from Old Oak Common will create a step-change in the area's connectivity. There will be rapid and direct access to key regional cities via HS21 and the Great Western Mainline, as well as central London and Heathrow via the Elizabeth Line. HS2 is planned to open in phases. Old Oak Common will initially serve as the London terminus for HS2.

Even for December 2023, this kind promotional hype was outdated. Yet it continues to be promulgated by HS2, OPDC and parties with an interest in talking up the prospects of this part of London (including Imperial College and developers City & Docklands). Our detailed submission to the GLA on the summer 2025 consultation on Towards a New London Plan expands on this theme.

OPDC's reaction to the June 18th announcement of the HS2 reset

OPDC's Statement of Reasons gives an explanation of why it considers that delivery of their Masterplan and Regeneration Strategy should proceed 'at pace'. The CEO report to the OPDC Board on July 10th included this material below, seeking to argue that the HS2 reset should not lead to a pause in the Corporation's plans:

3.5 Members will have seen that on June 18th the government published James Stewart's report on major transport projects and Mark Wild's (the new HS2 CEO) letter to the Secretary of State, both of which can be found here. Perhaps unsurprisingly this indicates, *inter alia,* that the programme will be delayed beyond the current opening window of 2029-33, and at this stage, and until the reset is complete (expected sometime next year), there is as yet no firm alternative date for the project's completion.

3.6 Whilst this is disappointing (though perhaps not unexpected), more positively we understand from HS2 station colleagues that the works to complete the Old Oak Common station remain on track, and we are optimistic that this should allow for the early release of associated works sites at Old Oak to allow for development plans to come forward in anticipation of rail services commencing.

3.7 Underlining this, our chair and Matt Carpen met with Mark Wild on 18th June and had a useful and constructive discussion on this and other matters, and Mr Wild confirmed his commitment to support OPDC in our work to secure early and meaningful regeneration as well as working with us to highlight the housing, regeneration and economic growth benefits that HS2 can and will bring to the areas.

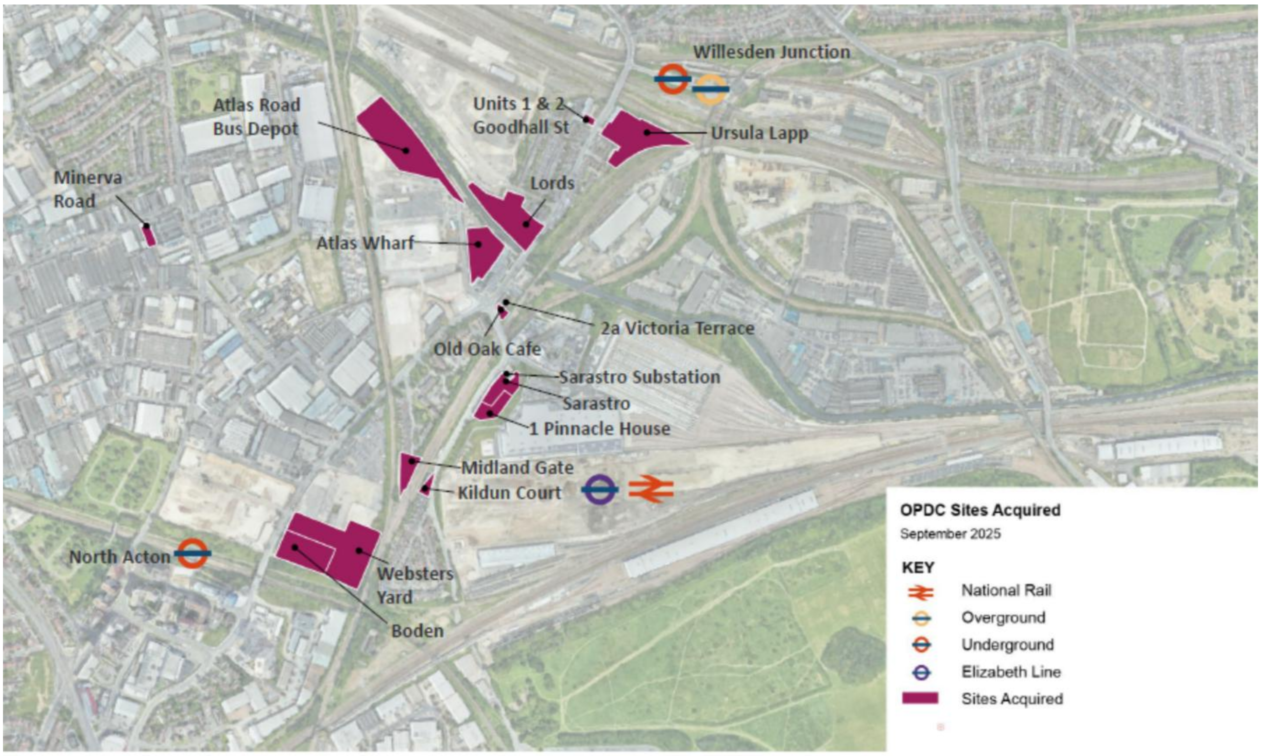
3.8 Furthermore, because we have been so successful in securing privately owned sites in the northern part of the scheme, we are confident that our plans for early delivery remain on course, given that this initial, but substantial phase is supported by access at the Willesden Junction interchange and so is not dependent on services from Old Oak Common. The extent of this phase – probably around 1,500

homes close to the Grand Union Canal, plus associated amenities including a major park - will take some years to complete, by which time Old Oak Common station will likely be operational, allowing for the full range of local transport choices to be available, and for subsequent development to come forward to completion.

3.9 We remain in close discussion with colleagues at DfT and HS2 and will update the Board further as the reset programme proceeds and we learn more about the implications.

The development sites which OPDC has acquired (or now controls) include four large landholdings relatively close to Willesden Junction station. These are Atlas Wharf, Old Oak Wharf, Atlas Road Bus Depot and the Ursula Lapp site (see OPDC map overleaf). Three of these sites are next to the Grand Union Canal.

Were OPDC to propose via its Masterplan to build new housing at Atlas Wharf and Old Oak Wharf at mid-density levels (350dph), our neighbourhood forum would be supportive. We presented proposals for such an outcome to the OPDC Planning Committee in September 2021, suggesting the use of self-build and modular housing at the Atlas Road/Channel Gate triangle and using the comparative speed of the neighbourhood planning framework to put in place site allocations and housing use policies in advance of adoption of the OPDC Local Plan (at that time still under Examination).



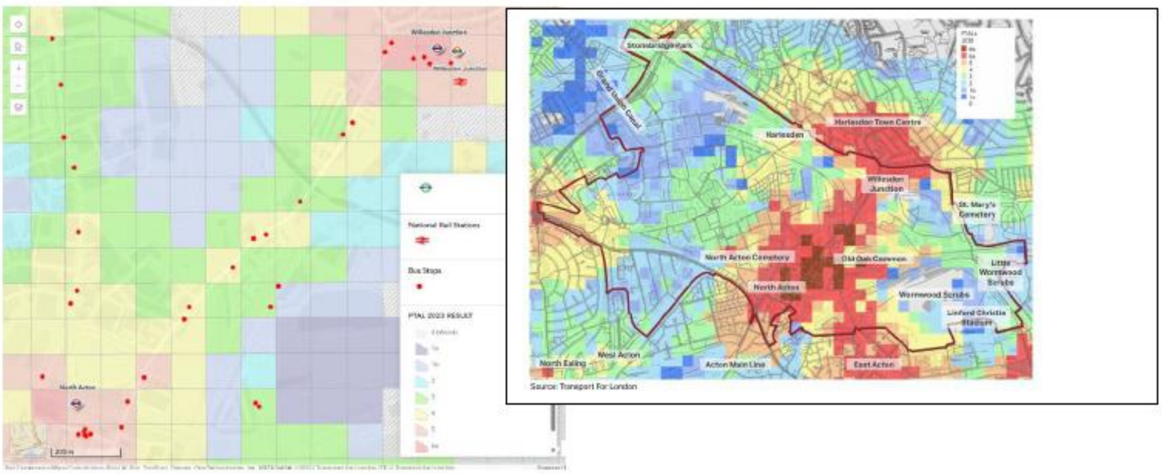
It is now four years on. OPDC are proposing a first phase of development on these sites, via a JV partnership, having acquired the sites from private developers at 2024 market values.

We would like to think that this Master Development Partnership will come up with better schemes than planned by Pocket Living (consented), and Gempoint 2000 (comsulted on). These schemes involved 817 homes in total. Paragraph 3.8 of the OPDC CEO report quoted above promises *probably around 1,500 homes close to the Grand Union Canal*. If this figure includes the Atlas Road Bus Depot, there seems every likelihood that MDP applications would involve densities and building heights at the levels of the Atlas Wharf consented scheme (30 storeys and a density of 706 units/hectare).

These locations and sites are not suitable for such very high densities. The Gerald Eve planning statement for the Atlas Wharf scheme got round this obstacle by pointing to Willesden Junction station and saying *Additionally, the Old Oak Common HS2 Station, which is currently under construction, will be located circa. 500 metres to the south-west of the Site and will offer direct national connections to the South-West, Midlands and North of England and Wales. This will lead to future improvements to the PTAL of the site to "excellent".*

Residents at Old Oak have heard this mantra for a decade, since it was first used in 2016 to justify planning consent for the 605 unit scheme at Old Oak Rise. We consider it unacceptable that a Development Corporation should proceed in 2025 as if the HS2 reset is or marginal impact on their Regeneration Strategy (which is not part of the development plan) and their proposals for an Illustrative Masterplan and JV partner. The CPO Order is the next (and premature) step in this process.

As shown in the OONF's recent response the GLA's [Towards a London Plan consultation](), misleading information on transport and connectivity at Old Oak has been published in the recent GLA 'pen portraits' of London's 47 Opportunity Areas. The Old Oak canalside area does *not* have good PTAL levels and nothing other than OOC station is committed or funded by way of new transport infrastructure in the pipeline.



The left hand image shows current PTAL levels around the OOC station site (from Willesden Junction to North Acton station) and is taken from the TfL WebCat model. These PTAL levels are 2 and 3 apart from 4 around these existing stations. The right hand image is from the new GLA 'pen portrait'of the OA. This gives no 'forecast date' nor information on what assumptions are involved. There are no funded plans for new stations (other than OOC station) and this image reflects a possible scenario in the 2040s. Old Oak West is not an area ready for early high-density development.

Conclusions

On all the evidence that our neighbourhood forum has amassed over the past decade and including the content of the OPDC Statement of Reasons, we consider that a *'compelling case in the public interest'* has not been made for the CPO Order.

If the Secretary of State concludes that the case is sound, we ask that, implementation of the OPDC CPO Order should be delayed at least until the outcome of the HS2 reset is known.

It is possible, in terms of timing, that a SoS decision on the CPO will anyway be in late 2026 following a public inquiry. And that by that date the Government will have made decisions on the HS2 reset. But this scenario risks an outcome where the reset exposes fresh facts and new questions beyond those examined at an CPO Inquiry, requiring an extension or restart in the face of legal challenges.

In the meantime, our neighbourhood forum will continue to lobby the London Assembly to hold a scrutiny session on OPDC's current plans and proposals including this CPO Order.

To set out our conclusions in more detail, these are:

- The OPDC Statement of Reasons for the CPO does not make out a compelling case in the public interest, at this time in late 2025. The making of the Order in September 2025 by OPDC has been premature.
- As argued above in this objection, the initial Mayoral Decision to approve the making of the Order was flawed, for lack of information on relevant considerations in the report MD3406.
- The OPDC Outline Business Case, underpinning the CPO Order, dates from 2023. Events have moved on with the June 2025 announcements on the HS2 reset. As the centrepiece of ambitions for the Old Oak area, the opening of Old Oak station has been delayed for at least a decade from its original 2026 date and very probably longer.
- This delay opens up a risk that the risk/reward ratio involved in any JV agreement or development partnership entered into by OPDC in 2026 will favour the developer(s) at costs to the public purse.
- OPDC is becoming over exposed to indebtedness in terms of repayments on loans from GLA Land and Property Ltd (GLAP). It is not clear from what sources debt interest will be met in the years before sites are developed.
- The OPDC Illustrative Masterplan involves departures from the 2022 OPDC Local Plan. The OPDC view that these departures are *capable of being in accordance with the Local Plan* has not yet been tested via any planning application, let alone that for the Masterplan itself.
- The Statement of Reasons fails to acknowledge or to address key parts of MHCLG 2025 Guidance on CPOs at paragraph 159.4 parts a), b) and c).
- OPDC has a regrettable track record of attempting to move too quickly (or 'at pace') towards using CPO powers to support a delivery strategy that is inadequately justified or supported by an adopted development plan. Substantial abortive expenditure of £6m was incurred in 2018/19. Scrutiny of OPDC's current approach by the London Assembly is needed to prevent a re-occurrence.
- **Were this CPO Order to be progressed to the stage of a Public Inquiry in early/mid 2026, it is essential that it should not be put into effect before the outcome of the HS2 reset is known and the Government has made a firm commitment to the completion of the remaining HS2 project.**
- As mentioned above, there is a possible alternative way forward, providing new 10-15 year housing in a rapid timescale on several of the sites assembled by

OPDC. If changes to the current development plan were needed, the neighbourhood planning framework could be used to put in place fresh site allocations in advance of a revision of the 2022 OPDC Local Plan.

Old Oak Neighbourhood Forum
October 2025