

**Title of report:** Western Lands Update  
**Meeting date:** 24 March 2022  
**Report to:** Board  
**Report of:** Ben O'Neill, Development Director

**For decision and noting**

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**This report will be considered in public**

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## **1. Summary**

- 1.1 This report provides a summary of the progress of our Western Lands work, including both our Strategic Outline Business Case (SOC), prepared for government, and our bid to the GLA for investment to support the bringing forward the first phase of delivery within our plans. It also seeks the Board's approval for expenditure to allow the team to continue this work.
- 1.2 OPDC reached a major milestone and submitted the final draft of our SOC for the Western Lands in February 2022. This was, at the time of writing, being taken through review and approval by government departments, which we hope will be successfully concluded later this spring.
- 1.3 Our bid for investment from the GLA's Land Fund has been approved by the Mayor (MD2956). We have secured a £50m interest-free loan to finance land acquisition, infrastructure and enabling works – supporting delivery of 1,100 homes by 2029. This represents our first major investment in the OPDC area to both support delivery of the GLA's housing target and unlock the wider delivery of Western Lands. The Board is being asked here to approve OPDC's entry into the GLA facility. It is also being asked to approve an initial draw down of funds (once the loan facility agreement has been entered into) to support pre-acquisition work for sites OPDC is seeking to buy with this funding.
- 1.4 Following the recent progress made with both the GLA and government, we now need to prepare to resource and mobilise work to support our delivery plans and meet our commitments to the GLA. Following the submission of the SOC, the team has been making considerable progress, in partnership with officials from Homes England, on a mobilisation plan. An update on this work is provided below, including a request for the Board to approve for expenditure required to support this work, as well as an approval to grant funding to Transport for London (TfL) and the GLA to undertake transport and infrastructure work.

- 1.5 The final draft SOC is still under active consideration by government departments and is included in Part 2 of the agenda as it contains confidential and exempt information. The information is exempt by virtue of paragraph 3 of Schedule 12a of the Local Government Act 1972 in that it contains information relating to the financial and business affairs of OPDC.

## **2. Recommendations**

The Board is invited to:

- 2.1 **Delegate to the Chief Executive Officer authority to approve expenditure in 2022/23 of up to £800,000 to support the development of OPDC's planning and regeneration strategy and the production of an outline business case for Western Lands.**
- 2.2 **Approve the payment of a £300,000 revenue grant, subject to the consent of the Mayor, to Transport for London, pursuant to section 121 of the Greater London Authority Act 1999**
- 2.3 **Approve the payment of a £60,000 revenue grant, subject to the consent of the Mayor, to the Greater London Authority, pursuant to section 121 of the Greater London Authority Act 1999**
- 2.4 **Approve OPDC's entry into the Land Fund facility agreement with the GLA, as per the conditions set out in this report and Mayoral Decision 2956, to finance land acquisition, infrastructure and enabling works, and associated due diligence costs for the purpose of accelerating OPDC's target of 1,100 homes within its development area by 31 March 2029.**
- 2.5 **Delegate to the Chief Executive Office authority to draw down and approve expenditure of up to £750,000 to carry out the necessary due diligence for potential site acquisitions, which can be funded from the facility.**
- 2.6 **Approve the application to the GLA for Investment Partner status to enable access to the Mayor's Affordable Housing Programme.**

## **3. Western Lands Strategic Outline Business Case (SOC)**

### Background

- 3.1 Since the Board's original approval in January 2020 of our revised regeneration approach, the team has worked to develop and evidence the case for delivering Western Lands as a comprehensive regeneration scheme through a collaboration between government (as landowner and funder) and the OPDC (with GLA support) as the local regeneration agency.
- 3.2 While OPDC developed its technical work alongside the modifications of the Local Plan, it has continued to engage with the Mayor and government officials throughout with both feeding into the final draft of the SOC which the Mayor has submitted to the Department for Transport (DfT) and the Department for Levelling Up, Housing and Communities (DLUHC).

- 3.3 In parallel to developing our SOC for the Western Lands, and as reported to the Board at previous meetings, we have been working on securing a key early investment from the GLA's Land Fund. The investment is aimed at accelerating the delivery of over 1,100 new homes by 2029 on sites that we plan to bring forward as an integral first phase of the overall scheme.
- 3.4 This investment is also a critical part of our engagement with government as it clearly signals the Mayor's support for OPDC and our plans by drawing on and optimising the use of existing funding programmes available to the GLA (both the Land Fund and the Mayor's Affordable Housing Programme).

#### Government approval of the SOC

- 3.5 OPDC's final draft of the SOC was submitted by the Mayor to both DLUHC and DfT on 16 February 2022. The SOC's proposal to bring forward regeneration at Old Oak as a comprehensive, single agency development consists of two main recommendations:
- that DfT should consolidate or pool its land in anticipation of this being transferred to the delivery entity
  - that DLUHC should recognise the need for further investment in land assembly and infrastructure investment around the major DfT land holdings required to optimise the scheme, with final investment decisions subject to a further detailed business case.
- 3.6 The SOC contains a range of commercially sensitive and, at this stage, other confidential information and is therefore appended to the part 2 paper that accompanies this report
- 3.7 The SOC is being taken through governance approval within both departments, which will also include initial engagement with Ministers and HM Treasury. Approval to the direction set out at para 3.5 will be the next major milestone for Western Lands and will create much clearer direction for OPDC, as well as HS2 Ltd, Network Rail and Homes England regarding their involvement in the next stage of developing the Western Lands.
- 3.8 We anticipate departments will conclude their consideration over the next few months. While the SOC is under active consideration by government, it may be subject to any final changes requested. As a result, OPDC plans to publish the final document (with the necessary redactions for confidential information) when this process is complete.
- 3.9 DLUHC has a new funding programme that could support Western Lands: the £1.8bn brownfield regeneration fund, announced by the Chancellor in last year's Autumn Budget. A detailed programme or prospectus has not yet been released; however, this is anticipated in the first half of 2022/23. Further detailed work will support any OPDC bid to this fund as well as any investment from existing funding streams such as the Affordable Homes Programme.

#### Next steps: Post-SOC work programme

- 3.10 The SOC sets out the broad framework for London and national government to work collaboratively to bring forward the Western Lands project and catalyse further benefits for Old Oak and Park Royal. It identifies the potential scale of

funding support the scheme will need to deliver our ambitions and suggests how delivery could be managed between the major partners.

3.11 However, as an early-stage document there are several areas which we will need to address at the next stage with a wider group of stakeholders and partners. These include:

- Plans for the preferred means by which overall development should be brought forward, including masterplanning, detailed scheme design and the mix and integration of uses and spaces it will need to deliver. Developing this will require extensive input from the community and key partners.
- Further assurance on the infrastructure required to support the scheme including its scope, how and when it should be delivered, its design and its long-term management and operation.
- Developing the principles agreed in the SOC into a legal framework to bring together government's interest as landowner and funder, the GLA's funding and OPDC's role as the statutory regeneration agency, bringing this into a governance and delivery model that will allow us to procure the best possible arrangement with private sector partners.
- A delivery plan that incorporates the 1,100 homes to be delivered through the GLA's Land Fund investment, as well as our wider ambitions as set out in the SOC.

3.12 To address these requirements, we are developing a detailed mobilisation plan alongside Homes England. The major workstreams identified to date are set out below.

3.13 **Outline Business Case:** Further government decisions on the arrangements for the organisation and transfer of land and the approval of funding will require the development of further business cases. The scope for this is being developed by OPDC and Homes England in consultation with departments. This work will be dependent on refined assumptions developed through the technical work and community engagement, set out above, and on negotiations with DfT and DLUHC. At this next stage, it will also be important that more detailed plans include input from host boroughs, Network Rail, HS2 Ltd and other stakeholders. We will require some additional support to develop the detailed business case, including financial and economic modelling expertise.

3.14 **Regeneration strategy and development principles:** The Western Lands proposals have followed the policy requirements set out within the Local Plan and development capacities for sites that align with the relevant site allocations. While we do not anticipate commissioning a detailed masterplan at this stage, we will want greater certainty over the main development principles and how Western Lands is brought forward. Examples of issues we will wish to explore further, through engagement with communities, stakeholders and partners, will include:

- how development interfaces with existing communities and the wider context of the area, including landscape features and local heritage
- requirements for town centre uses and social infrastructure
- further detail on how to achieve carbon reduction
- anticipated capacity, massing parameters and the distribution of uses and housing types

- infrastructure requirements including connectivity, utilities, green space, and social provision
  - the phasing of development and infrastructure delivery including opportunities to make early improvements to the area or accelerate enabling work
  - managing other project risks such as ground contamination, restrictive rights, environmental impacts, etc.
- 3.15 Making progress on this will require us to engage with our communities, our local boroughs and key stakeholders, and seek further input beyond that received through the Local Plan consultation. This engagement will be a crucial part of developing the regeneration framework.
- 3.16 Developing our regeneration framework and commissioning the further business case will require input from specialist consultants.
- 3.17 **Additional staffing resource:** Delivering the work required to support the recommendations of the SOC, as well as deliver the Land Fund investment as set out below, will require an increased level of resourcing. OPDC is recruiting to a number new roles whilst anticipating that further resourcing will be required. As noted in the CEO report, these costs should be containable within our 2022/23 budget, and taking account of our wider potential resourcing needs, we may require additional funding from the GLA's Mayoral Development Corporation Reserve during the next financial year.
- 3.18 **OPDC's budget for Western Lands development in 2022/23 is £800,000. The Board is asked to delegate to the Chief Executive Officer authority to approve expenditure within this budget.** The Development Director will be the SRO for work commissioned within this budget and will report to the Board on the planning and progress of work at its future meetings.
- 3.19 This authority is being sought ahead of final approval of the SOC to allow OPDC to develop its detailed plan, procuring specialist input where required. This is required to allow us to maintain progress in line with our programme as slippage on our timetable would place a major risk for the wider project. Expenditure will be closely monitored and managed until the SOC is approved.
- 3.20 OPDC has identified work that is complementary to our project that is being undertaken other GLA Group bodies, in line with their role in London's transport network (TfL) and London's utility network capacity (the GLA Infrastructure Coordination Service).
- **Strategic transport modelling:** Required by TfL to consider any major planning application, this allows them as strategic transport authority to ensure developments mitigate their impact on London's transport network. This modelling will also allow OPDC to review the scope of transport improvements to be delivered by Western Lands, including considering post-Covid demand patterns. Identifying when improvements are required will also help develop our infrastructure programme alongside the delivery of new homes and employment space. This work will be delivered by TfL's strategic modelling team, with input from OPDC and borough transport leads.
- A budget of £240,000 has been agreed for this work with TfL and can be funded via a revenue grant from OPDC's 2021/22 budget.

- **Improvements to North Acton Station:** TfL undertook a business case for improving capacity and providing step-free access at North Acton Station in 2019. While the business case identified feasible options, these have not been revisited to integrate OPDC's new Western Lands plans, including the opportunity to unlock additional development capacity on adjacent London Borough of Ealing, TfL or Network Rail land.

LB Ealing, OPDC and TfL's objectives for North Acton remain to deliver step-free access, enhanced capacity, improved visibility, and accessibility and unlock further development or public realm improvements where possible. This work will be delivered through a joint OPDC, Ealing and TfL client group and commissioned by TfL. A budget contribution of £60,000 has been agreed with TfL and can be funded through a grant from our current year's budget as set out above.

- **Utilities reinforcement plan:** The GLA's infrastructure team has established the Infrastructure Coordination Service (ICS) as a specialist team that supports boroughs and developers to plan, coordinate and deliver utilities reinforcements.

The ICS is seeking to take forward a pilot that aligns with OPDC's work to identify and map its existing utilities network and forecast future requirements for Western Lands including early deliver sites and other major mixed use allocations. This will allow the ICS to develop its knowledge of the OPDC area and support third party schemes.

The plan will also provide advice on the cost and phasing of utilities reinforcements, including identifying opportunities where early reinforcement may be advantageous and cost effective versus more incremental improvements. This will be developed alongside the Local Area Energy Plan being worked up for the whole of Park Royal and Old Oak.

The infrastructure mapping will identify any rights, build-over restrictions or other risks arising from the utilities network that could impact our develop plans helping identify these early and mitigate their impact where possible.

The plan will be delivered by the ICS with input from OPDC. A budget of £60,000 has discussed with the ICS and will be transferred from OPDC's 2021/22 budget.

**The Board is asked to approve total expenditure of £360,000 from OPDC's 2021/22 budget to contribute towards TfL's and the GLA's work to deliver the items set out above.**

#### **4. Mayor's Land Fund update**

##### Background

- 4.1 As reported to the Board in November 2021, OPDC submitted a proposal for investment from the Mayor's Land Fund to support early delivery sites in Western Lands. Our Land Fund business case bid for a £50m interest-free loan facility to finance the assembly of land and any enabling costs for priority early-win sites at Western Lands – and was approved by the Mayor on 3 March 2022.
- 4.2 The purpose of the loan is to accelerate the delivery of between 1,100 and 1,500 homes by March 2029, facilitate a planning policy compliant delivery of affordable

housing on public and private land, and act as an early catalyst for the wider regeneration of the OPDC area. To enable this, OPDC will carry out pre-acquisition due diligence and land acquisitions within the facility envelope, with a view to disposing of assembled sites to the market via a procurement framework to be agreed with the GLA.

- 4.3 GLA funding will unlock and bring forward a range of sites where substantial numbers of new homes and jobs can be developed quickly to bring forward development prior to the arrival of HS2. The funding is flexible enough that should the SOC submitted to government be successful, it could be invested in a wider range of enabling investments that supports the delivery of housing in Western Lands.
- 4.4 Affordable housing would make up a minimum of 40 per cent of the new homes on a portfolio basis sites delivered with this facility, with a target to deliver 50 per cent overall. OPDC is committed to maximising the affordable housing in schemes it will deliver and is recommending it apply to become an investment funding partner of the GLA's Affordable Homes Programme (AHP). This will allow OPDC to apply for affordable housing grant to deliver as many affordable homes as possible. Investment Partner status does not oblige OPDC to draw funding directly from the AHP, and it may be more appropriate and efficient for existing registered providers and investment partners to do so, but it does enable the facility to be used where there is a good case to do so.
- 4.5 The Heads of Terms for the Land Fund investment have been agreed and have been provided as an appendix to an accompanying part 2 paper. Agreement of the facility agreement contract is being progressed with the GLA. We anticipate completing the funding agreement before the end of March 2022.
- 4.6 **The Board is asked to approve OPDC entering into the Land Fund Facility Agreement, and approve also our application for Investment Partner status.**

Land Fund investment: Next steps

- 4.7 All Land Fund acquisitions must satisfy the GLA's pre-acquisition information requirements. The specific scope of due diligence required by the GLA is set out at Appendix A and must be approved by the GLA to authorise the drawdown of funding. The cost of carrying out this work is funded from the facility itself.
- 4.8 OPDC has already undertaken some of this work on certain sites as part of the development of its proposals for both the government and GLA. Therefore, the scope of additional work will vary on a site-by-site basis, as will the scale and complexity of that work, based on site specific conditions.
- 4.9 Further detail on the initial short-listing of sites is set out in the accompanying part 2 paper. However, to make progress on delivering our commitments to deliver 1,100 homes through this facility by 2029, it is recommended that OPDC make an initial drawdown of funds and progresses this work for shortlisted sites.
- 4.10 **The Board is asked to approve:**
- **An initial drawdown of £750,000 to fund pre-acquisition due diligence on shortlisted sites.**
  - **A delegation to the Chief Executive Officer to approve expenditure within this envelope.**

- 4.11 We also require the appointment of property agents, valuers and legal advice to provide transactional support. A procurement exercise is currently underway to secure this additional agency and valuation support, while lawyers will be appointed through the TfL legal framework.
- 4.12 This authority will also allow OPDC to progress any post-acquisition work to bring sites forward (design, feasibility, planning and procurement work). However, the pace and scope of that work will be dependent on OPDC's success at acquiring target sites.
- 4.13 This work will be approved in accordance with OPDC's scheme of delegation and progress against this work reported to Board at future meetings.

## 5. Management and delivery matters

### Project delivery, governance, and assurance

- 5.1 The Development Director will act as Senior Responsible Officer (SRO) for all post-SOC workstreams. A mobilisation work programme, to include a procurement and resourcing plan, will be approved by the Chief Executive Officer and shared with the Board.
- 5.2 The Development Director will also act as the SRO for the Land Fund Facility. Day to day management of the work will be led by the Projects Director with support from the Senior Development Manager.
- 5.3 OPDC and the GLA are developing a governance framework for the joint oversight and approvals of acquisitions or other investments to be made through the Land Fund facility as part of agreeing terms. Detailed governance proposals will be brought to the Board at its June 2022 meeting.
- 5.4 OPDC will continue to develop the outline business case with oversight from a steering group to include DfT, DLUHC, Homes England and the Infrastructure and Projects Authority. Further consultation with the GLA, Network Rail, HS2 Ltd and our local boroughs will be sought at key stages.
- 5.5 OPDC will procure all specialist input from appropriate frameworks. For key advisory disciplines, we may seek multi-year call-off appointments to ensure we can access consistent advice from experts over the life of the project. Following discussion with TfL, it is clear that the scale of procurement activity we require will need additional support beyond the TfL procurement team's existing capacity, so it is proposed that part of the budget delegation requested in this paper will be used to fund additional, dedicated resource in the TfL procurement team to work on OPDC procurements.

### Risks and issues

Risk description	Inherent score	Mitigations	Target score
The SOC is not approved, is approved late, or is approved with	Likelihood: 2 Impact: 5 Total: 10	<ul style="list-style-type: none"> <li>Significant engagement with departments in the development of the SOC,</li> </ul>	Likelihood: 1 Impact: 4 Total: 4



onerous conditions		<ul style="list-style-type: none"> <li>including securing the support of senior officials</li> <li>• Strong Mayoral support and advocacy for the SOC</li> <li>• Careful management of financial commitments for post-SOC work</li> </ul>	
Budget for post-SOC work may not be sufficient to cover all deliverables	Likelihood: 2 Impact: 5 Total: 10	<ul style="list-style-type: none"> <li>• Utilise remaining 2021/22 budget to support TfL/GLA complimentary work</li> <li>• Detailed delivery plan to be developed for subsequent Board approval</li> <li>• Optimise use of GLA and Homes England resources</li> <li>• Engage with GLA where additional funding is required</li> </ul>	Likelihood: 1 Impact: 4 Total: 4
OPDC does not have adequate resource or expertise to deliver	Likelihood: 3 Impact: 4 Total: 12	<ul style="list-style-type: none"> <li>• Expanding the development team to include additional project and development management resource</li> <li>• Close working with GLA Housing &amp; Land and use of other GLA resources</li> <li>• TfL support for consultant appointments proactively managed</li> </ul>	Likelihood: 2 Impact: 3 Total: 6
Community engagement fails to develop support or consensus for proposals	Likelihood: 3 Impact: 4 Total: 12	<ul style="list-style-type: none"> <li>• Engagement from early on to ensure the community can influence proposals</li> <li>• Ensure reach of the consultation through proactive planning</li> <li>• Set expectations around real opportunities to shape proposals within the envelope for development set by the Local Plan</li> </ul>	Likelihood: 2 Impact: 2 Total: 4
Land Fund: Land receipts do not materialise and OPDC fails to repay the loan	Likelihood: 3 Impact: 4 Total: 12	<ul style="list-style-type: none"> <li>• Professional commercial advice to ensure prudent acquisitions</li> <li>• Model scenarios and create business plan</li> <li>• Soft market testing</li> <li>• GLA approves individual sites before purchase</li> <li>• GLA approves disposal approach</li> </ul>	Likelihood: 2 Impact: 3 Total: 6

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		<ul style="list-style-type: none"> <li>• Open market competition to drive best consideration for disposal</li> </ul>	
Land Fund: Technical risks of site abnormal conditions and contamination	Likelihood: 3 Impact: 3 Total: 9	<ul style="list-style-type: none"> <li>• Offers will be subject to professional reports, examination and advice</li> <li>• Land price will be based on a residual valuation considering the results of surveys and/or appropriate contingencies for identified site issues</li> </ul>	Likelihood: 2 Impact: 3 Total: 6

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## 6. Equality comments

- 6.1 OPDC must have 'due regard' to the need to eliminate unlawful discrimination, harassment, and victimisation, as well as to the need to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not.<sup>1</sup>
- 6.2 When considering the needs of the existing community and those that will be affected by the proposed development (both currently and in the future development schemes), development activity will look to minimise disadvantages to all protected characteristic groups within society. The decisions in this report are therefore expected to have a positive impact on persons with a protected characteristic under the Equality Act, as increasing the supply of housing in London will help to address problems such as overcrowding and homelessness, which evidence indicates disproportionately affect specific groups, including Black and Minority Ethnic groups and women.
- 6.3 The delivery of new and additional homes will help to implement the objectives of the Mayor's Equality Diversity and Inclusion Strategy "Inclusive London" (May 2018). This includes working with housing associations, councils, developers, investors, and government to help increase the supply of homes that are genuinely affordable to buy or rent. This will help to tackle the inequalities experienced by certain groups of Londoners most affected by the city's shortage of affordable homes.
- 6.4 The delivery of high-quality housing will also promote improved health and wellbeing, given evidence of an association between poor housing conditions and poor health. The health and wellbeing of residents will be a priority within the vision for the developments to address this.

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<sup>1</sup> This involves having due regard to: the need to remove or minimise any disadvantage suffered by those who share a protected characteristic or one that is connected to that characteristic; taking steps to meet the different needs of such people; and encouraging them to participate in public life or in any other activity where their participation is disproportionately low. The protected characteristics and groups are: age, disability, gender reassignment, pregnancy and maternity, race, gender, religion or belief, sexual orientation and marriage/ civil partnership status. Compliance with the Equality Act may involve treating people with a protected characteristic more favourably than those without the characteristic. The duty must be exercised with an open mind and at the time a Decision is taken in the exercise of OPDC's functions.

- 6.5 OPDC is planning to develop a welcoming place that is fully accessible and inclusive, providing opportunities for all and reflecting local needs – as a live example, our Planning directorate is preparing an Equality, Diversity, and Inclusion (EDI) matrix which that at issues for each of the protected characteristics for the Supplementary Planning Documents and the policy / guidance mechanisms to address issues and meet needs. The idea is that this is further shaped by:
- additional EDI research
  - input from local people with protected characteristics
  - input from EDI experts in the built environment (e.g. OPDC have met with ARUP and the University of Westminster authors of 'Queering Public Space').
- 6.6 The GLA Group Responsible Procurement Policy sets out the GLA Group's plans, ambitions and commitments for ensuring socially, environmentally and economically sustainable procurement to deliver improved quality of life and better value for money for Londoners. As part of its procurement strategy, OPDC will ensure that bidders set out how they will embed EDI and enhance the social value outcomes in their delivery by submitting an EDI statement and action plan. Compliance and performance against the EDI action plan will then be monitored as part of the monitoring and reporting process.
- 6.7 Any intervention by OPDC's Delivery Directorate will be subject to a detailed equalities impact assessment (EQIA) at the appropriate stage of that project (e.g. at the submission of a planning application) and imbedded in the development of any proposals.

## **7. Financial implications**

- 7.1 The expenditure of £360,000 (£60,000 for the GLA; £300,000 for TfL) will be made under section 121(2) of the GLA Act 1999, which provides that a Functional Body may, with the consent of the Mayor, pay a grant towards meeting revenue expenditure incurred or to be incurred by another Functional Body for the purposes of, or in connection with, the discharge of the functions of the body to which the grant is made. Mayoral consent is being sought through a Mayoral Decision form (MD2971) and officers will be able to provide a verbal update to the Board on this. The expenditure will be funded from the 2021/22 OPDC budget.
- 7.2 The expenditure of £800,000 for Western Lands Development will be funded from the 2022/23 Development budget, which was approved for inclusion in the Mayor's Consolidated Budget by the Board at its meeting of 30 November 2021.
- 7.3 Capital expenditure of £750,000 on pre-acquisition due diligence will be met from the loan facility with the GLA and incurred in line with the conditions of the loan agreement.

## **8. Legal implications**

- 8.1 The report above indicates that the decisions requested falls within the OPDC's object of securing the regeneration of the Old Oak and Park Royal area and its powers to do anything it considers appropriate for the purpose of its objects or purposes incidental to those purposes, as set out in the Localism Act 2011

- 8.2 Section 121 of the Greater London Authority Act 1999 (the “Act”) provides that a functional body, such as the OPDC, may, with the consent of the Mayor, pay a grant towards meeting revenue expenditure incurred or to be incurred by the GLA and/or another functional body, such as TfL, for the purposes of, or in connection with, the discharge of the grant recipients’ functions.
- 8.3 It should be noted that the only condition which may be placed upon the award of such funding is that it may only be used to meet revenue expenditure incurred in the discharge of the grant recipients’ functions.

## **Appendices**

Appendix A: Loan facility due diligence

## **Background papers**

[November 2021 Development Director Report](#)

[Mayoral Decision 2956: OPDC Land Fund Facility](#)

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