

REQUEST FOR MAYORAL DECISION – MD3406

Old Oak Compulsory Purchase Order

Executive summary:

On 10 July 2025, the Board of the Old Oak and Park Royal Development Corporation (OPDC) resolved to make the Old Oak and Park Royal Development Corporation (Old Oak) Compulsory Purchase Order 2025 (Old Oak CPO).

The Old Oak CPO, if confirmed, will authorise the compulsory acquisition of land at Old Oak (the Order Land), for the purposes of facilitating the regeneration of the area. Mayoral consent is sought for the OPDC to submit the Old Oak CPO to the Secretary of State for Housing, Communities and Local Government for confirmation.

The Order Land sits within the Old Oak and Park Royal boundary, and is adjacent to the new Old Oak Common HS2 station. Delivery of the regeneration scheme is expected to provide around 8,000 new homes, including affordable homes; approximately 150,000–200,000 square metres of new commercial and employment space; and new community and public facilities, new parks and open space.

The regeneration proposals are underpinned by an outline business case approved by central government. Both the proposals and the outline business case are supported in national and local planning policy. A compulsory purchase order for the Order Land is necessary to: facilitate the comprehensive regeneration of the Old Oak area; overcome the current fragmented ownership of the land; and enable the delivery of the early strategic infrastructure required to unlock the regeneration.

To date, 93 per cent (by area) of the land required to deliver the Old Oak regeneration proposals is in public ownership. The OPDC is in advanced negotiations with the public-sector landowners to secure the publicly owned land; it has already acquired approximately seven hectares of privately owned land. The OPDC will continue to negotiate with affected landowners to acquire outstanding interests by agreement, while seeking to secure confirmation of the Old Oak CPO.

Decision:

That the Mayor:

- consents, under section 207 of the Localism Act 2011, to the Old Oak and Park Royal Development Corporation (OPDC) submitting the Old Oak and Park Royal Development Corporation Compulsory Purchase Order 2025 (Old Oak CPO), substantially in the form appended at Appendix 1, to the Secretary of State for Housing, Communities and Local Government for confirmation; this is to facilitate the comprehensive regeneration of land at Old Oak
- notes that the Chief Executive of the OPDC may make minor amendments and modifications to the proposed Old Oak CPO prior to making and submitting the Old Oak CPO to the Secretary of State for confirmation.

Mayor of London

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority. The above request has my approval.

Signature:



Date: 20/08/25

PART I – NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR

Decision required – supporting report

1. Introduction and background

- 1.1. Under section 207(2) of the Localism Act 2011, the Old Oak and Park Royal Development Corporation (OPDC), as a Mayoral Development Corporation (MDC), has the power to acquire land in its area (or elsewhere in Greater London) compulsorily if the Secretary of State authorises it to do so. Under section 207(3) of the Localism Act 2011, the OPDC must obtain the Mayor of London's consent before submitting a compulsory purchase order to the Secretary of State for confirmation.
- 1.2. The OPDC is seeking the Mayor's consent to submit a compulsory purchase order to the Secretary of State for confirmation. This is to facilitate the comprehensive regeneration of an area within its administrative area, known as Old Oak.
- 1.3. Old Oak comprises around 30 hectares of brownfield land, most of which is owned by public-sector stakeholders. It includes land currently in use as construction sites for HS2 and the new Old Oak Common station.
- 1.4. Old Oak comprises a number of sites that are allocated for development in the OPDC's Local Plan and the Old Oak West Supplementary Planning Document (SPD). It will also include new publicly accessible open spaces, green infrastructure, healthy streets and social infrastructure.
- 1.5. In regenerating land at Old Oak, the intention is to take advantage of the opportunity to carry out major redevelopment on primarily underused public-sector brownfield land. This land benefits significantly from its proximity to the new Old Oak Common Station, which will serve HS2 and the Elizabeth Line.
- 1.6. The OPDC has undertaken extensive masterplanning work for Old Oak, and an Illustrative Masterplan has been prepared. This provides a spatial exemplar of how the regeneration can be delivered, through comprehensive development, to provide:
 - around 8,000 new homes, including affordable homes
 - up to 200,000 square metres of commercial and employment space
 - new social infrastructure, including a primary school, health facilities and leisure centre.The Illustrative Masterplan addresses the strategic provision of other site-wide infrastructure – including open space and green corridors; new routes connecting the two new neighbourhoods; and connecting adjoining areas and communities.
- 1.7. The Illustrative Masterplan provides a clear indication of how the regeneration proposals could be delivered. However, the OPDC will use its powers (including compulsory purchase powers) to assemble the required land before coming to a final decision about the detailed design and content of the redevelopment proposal for land at Old Oak.
- 1.8. The OPDC has undertaken significant engagement, consultation and communication with local and strategic stakeholders involved in delivering redevelopment at Old Oak. The OPDC has also undertaken formal engagement with the relevant planning authorities on the Illustrative Masterplan, including engagement with the OPDC Planning Committee and the GLA (as strategic planning authority for London). The local planning authority arm of the OPDC is generally supportive of the Illustrative Masterplan, the direction of travel, the principles and the site-wide strategies underpinning the proposals, although any future planning application(s) will be determined on its merits in the usual manner. GLA planning officers are also generally supportive of the Illustrative Masterplan.

- 1.9. The OPDC has engaged extensively with owners of interests in the land at Old Oak (Order Land). It has also engaged with occupiers. Where it has not been possible to acquire the interests and rights required by agreement (for example, where the owners of interests are non-responsive or unwilling to agree to a settlement through the OPDC's programme of engagement), it will be necessary to acquire the interests and rights compulsorily. In addition to continuing to negotiate with the remaining owners of interests in the Order Land, it will be necessary to use the Old Oak CPO to enable the OPDC to acquire rights in, under and over the Order Land. This is so it can override third-party rights, restrictions and easements, which will aid the comprehensive regeneration of the Order Land.
- 1.10. The Order Land comprises approximately 31 hectares of land in North Acton. It is a mixture of industrial and commercial units; residential properties; HS2 construction sites; public adopted highways; and railway land and sidings. As the development of HS2 progresses towards completion, the worksites will become surplus to HS2's requirements and available for development. 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. However, this will not impact on the early phases which will be built out on land which is not required for HS2.
- 1.11. The current fragmented ownership of the Order Land, and the early strategic infrastructure required to unlock the redevelopment, act as a barrier to the regeneration of land at Old Oak. There are separate land interests not in public ownership within the area; these need to be acquired by the OPDC for coherent and comprehensive development to be carried out.
- 1.12. In February 2025, the OPDC's Board approved the Land Assembly and Relocation Strategy (LARS) for Old Oak. This sets out the relocation support that will be offered to all owners, occupiers and residents of Old Oak affected by the scheme. The OPDC is proactively engaging with commercial and residential landowners and tenants across the Order Land, to support individuals through change and relocation. The OPDC has successfully acquired, or contracted to acquire, approximately seven hectares of privately owned land (by area), by private agreement. In line with government guidance on the use of CPO powers, the OPDC will continue to engage with private landowners and occupiers to acquire outstanding interest in the Order Land. This will be done in parallel with progressing the Old Oak CPO, with the ultimate aim of seeking to acquire land and rights by agreement, rather than by having to rely solely on the powers to be conveyed by the Old Oak CPO.
- 1.13. The total area within public ownership (OPDC, Department for Transport (DfT), Network Rail, Transport for London (TfL) and the London Borough of Ealing) is approximately 29 hectares, with a remaining two hectares to be acquired through either negotiation or a CPO. The proposals for the regeneration of land at Old Oak are supported at all levels of government. At a national level, a strategic outline business case was approved in early 2022, and in early 2024 an outline business case was approved by the Ministry of Housing, Communities and Local Government (MHCLG) and DfT. The development of both the strategic outline business case and the outline business case was sponsored by Homes England and supported by the Mayor of London.
- 1.14. A Collaboration Memorandum of Understanding has been put in place between the OPDC, MHCLG, DfT, Network Rail and HS2. This sets out the basis on which the public sector will work together collaboratively to deliver the project. A senior board (the Collaboration and Assurance Board) has been established to bring these parties together to oversee delivery.
- 1.15. The Order Land includes land owned by London Underground; but only third-party interests in this land are included within the Old Oak CPO.
- 1.16. The Order Land also includes land that may be safeguarded in future for the proposed West London Orbital (WLO). However, the OPDC has acknowledged to TfL that any such land will not be taken for redevelopment if it is required for the WLO.
- 1.17. Notwithstanding the OPDC's continued efforts to negotiate with the remaining owners and occupiers of interests in the Order Land, the OPDC considers it necessary to acquire some interests compulsorily, to provide certainty that all land and rights required for the regeneration of Old Oak will be available.

- 1.18. The OPDC will take all necessary steps to secure the confirmation and implementation of the compulsory purchase order.

2. Objectives and expected outcomes

- 2.1. The objective is to deliver the Old Oak project. Without a CPO, it will very likely be impossible to assemble the land and interests necessary to deliver a comprehensive regeneration project, as set out in the outline business case. If no action is taken by the OPDC, development around Old Oak Common Station would occur on a piecemeal basis. This would result in sub-optimal and slower development than the comprehensive approach. Failure to consolidate existing private-land interests, through the promotion of the CPO, would also mean that, for plots currently in public ownership, their development potential would not be comprehensively delivered.
- 2.2. The following strategic objectives underpin the rationale for the Old Oak project:
- **drive economic growth** – create a nationally significant cluster of new and existing businesses that drives economic growth and invests in the local workforce
 - **build more homes** – maximise the number of homes, affordable and market sale, ensuring all are built to a high standard of design and construction
 - **create a place to be proud of** – create a distinct place with resilient town centres; quality public realm that reflects local heritage; and social infrastructure that meets community needs
 - **ensure value** – maximise value for the UK taxpayer by optimising the use of public land to deliver financial, regeneration, housing and transport outcomes
 - **create a better environment** – create a place that is resilient to the climate crisis, and positively contributes to people's health, wellbeing and the environment
 - **deliver at pace** – ensure development is well under way by the time Old Oak Common station opens (between 2029 and 2033).

3. Equality comments

- 3.1. Section 149(1) of the Equality Act 2010 provides that, in the exercise of their functions, public authorities – of which the Mayor is one – must comply with the public sector equality duty (PSED) by having due regard to the need to:
- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 3.2. The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination), race (ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, and sexual orientation
- 3.3. The OPDC has undertaken an equalities impact assessment (EqIA) of the Old Oak CPO in accordance with the PSED under section 149 of the Equality Act 2010. See Appendix 3 for the EqIA, which

concludes that the acquisition of the Order Land and the subsequent delivery of the proposed regeneration of land at Old Oak will contribute to improvements in the area through the following:

- A net increase of approximately 8,000 new homes on-site, including social and other affordable housing. Plans also include family housing, which can be of particular benefit to protected characteristic groups living in the area. The OPDC will aim to ensure that persons with protected characteristics can benefit from this housing.
- Employment creation in construction-related jobs – as well as up to 200,000 square metres of new commercial space on the site, creating significant further employment opportunities. With appropriate procurement, as well as skills, employment and education plans, this can benefit those who are overrepresented in local unemployment figures – especially young Black people.
- An increase in public open space. This includes improved public realm; and increased accessibility and connectivity to public transport and active travel networks. People sharing protected characteristics can likely share in these benefits, if they are designed in line with inclusive design standards and in collaboration with the local community.
- A new urban centre. This includes a new high street, shops, cafes, restaurants, schools (including a new primary school) and other community amenities. Community engagement is helping to shape proposals.
- Increased health and wellbeing for local people, through an increase in open space and improved access to active travel. This can be a benefit for those who are more vulnerable to poor health outcomes.
- Opportunity for new accommodation with improved facilities for businesses on-site; and increased footfall, transport links and increased customer base for remaining businesses.

- 3.4. The EqIA also identified some negative impacts, which include loss of homes, temporary or permanent loss of employment in businesses unwilling or unable to relocate, uncertainty and anxiety for existing businesses and residents and construction related impacts. An EqIA Action Plan has been developed to mitigate the potential direct and indirect effects of the Old Oak CPO. This describes an overview of each impact; key protected-characteristic groups affected; and details of planned or recommended mitigation/actions to support the enhancement of positive effects and minimising of negative effects. See Appendix 3 for the EqIA Action Plan.
- 3.5. The Human Rights Act 1998 (1988 Act) places a duty on the Mayor to be satisfied that the OPDC can demonstrate that the use of compulsory purchase powers would be in the public interest; and that the potential use of such powers would be proportionate to meet the wider objective of facilitating the regeneration of the Order Land.
- 3.6. Neither the Mayor nor the OPDC may act in a way that is incompatible with a Convention right protected by the 1998 Act. In particular, in the context of the proposed Old Oak CPO, there is a need to consider the rights under Article 8 (right to a private and family life), Article 1 of the First Protocol of the Convention (protection of property) and Article 6 (1) (right to a fair and impartial public hearing within a reasonable time).
- 3.7. The European Court of Human Rights has recognised that “regard must be had to the fair balance that has to be struck between competing interests of the individual and of the community as a whole”. Both public and private interests are to be taken into account in the exercise of the OPDC’s powers. Any interference with a Convention right must be necessary and proportionate.
- 3.8. Significant public benefits would arise from the regeneration of the Order Land. Considering these, and the extent of the interference with parties’ rights and the measures being put in place under the EqIA Action Plan and the LARS, making and (if confirmed) implementing the Old Oak CPO would be necessary and proportionate. It is unlikely to amount to an unlawful interference with individual property rights.

4. Other considerations

Key risks and issues

4.1. Risks will be managed by the OPDC in accordance with its Risk Management Framework. The following key risks have been identified:

- The Secretary of State does not confirm the Old Oak CPO: The OPDC has developed a strong case for the Old Oak CPO. The Statement of Reasons explains the rationale and evidence for making the Old Oak CPO. The OPDC has also identified how potential impediments will be overcome; and is demonstrating, through the LARS, efforts to secure land and interests outside of CPO wherever possible. This approach reduces the risk of an unsuccessful CPO (and provides evidence of the Old Oak CPO being used as a last resort).
- Failure of the OPDC to follow required statutory processes: The OPDC has an experienced team in place leading the Old Oak CPO. It has appointed Ashurst LLP and King's Counsel, in addition to receiving advice from TfL Legal, to ensure that all statutory processes are followed correctly.
- Promoting the Old Oak CPO without the benefit of an express planning permission: It is not essential to obtain planning permission before making a CPO. Government guidance on the use of CPO powers requires an acquiring authority to have a clear idea of how it intends to use the land it is proposing to acquire; but goes on to acknowledge that it is not always possible for acquiring authorities to have specific, detailed proposals for the land beyond the general planning framework for the area (including a masterplan for the land) that has been endorsed by the acquiring authority. The Illustrative Masterplan, as recently endorsed by the OPDC's Board, demonstrates how it intends to facilitate that regeneration of the Order Land. The guidance also contains specific advice on the use of CPO powers by MDCs. It is recognised that an MDC has a statutory objective to secure the regeneration of the area over which it has been established; and that, in some instances, MDCs may wish to promote a CPO, for the purpose of assembling land for which it has wider corporate objectives. This includes bringing about regeneration by assembling land and providing infrastructure over a wide area, to secure or encourage its development by others.
- Insufficient resources available to the OPDC to complete land assembly following confirmation of the CPO: The OPDC has secured capital resource to complete the purchase of land and interests identified in the Old Oak CPO. This budget has been informed by detailed advisory and valuation work, and will be kept under regular review.

Links to Mayoral strategies and priorities

4.2. This decision has been written to ensure alignment with the Mayoral priorities. It delivers against multiple objectives, as illustrated below:

- London Plan 2021 – facilitates the comprehensive development identified in the Old Oak Illustrative Masterplan, and a new urban centre – including a new high street, shops, cafes, restaurants, schools and other community amenities. See Policy SD10: strategic and local regeneration; Policy D8: public realm; Policy SD6: town centres and high streets; and GG5: growing a good economy.
- London Growth Plan – employment creation in construction-related jobs; and up to 200,000 square metres of new commercial space on the site, creating significant further employment opportunities.
- London Housing Strategy – facilitates delivery of 8,000 high-quality new homes that achieve the latest London housing standards.

- Mayor's Transport Strategy – supports delivery of car-free development, and the comprehensive development around the new HS2 Old Oak Common station and Elizabeth Line interchange' and safeguards a future WLO station within the masterplan boundary
- London Environment Strategy – an increase in public open space, including improved public realm; and increased accessibility and connectivity to public transport and active travel networks.
- Skills Roadmap for London – with appropriate procurement and skills, employment and education plans in place, the comprehensive development of land at Old Oak can benefit those who are overrepresented in local unemployment figures (especially young Black people).
- Culture Strategy for London – facilitates the significant, comprehensive development of land at Old Oak as a potential future metropolitan centre that supports globally competitive growth industries. These includes creative industries (art, film and TV, and food), life sciences, education, green tech and precision manufacturing.

Links to wider planning policy

- 4.3. Comprehensive regeneration of land at Old Oak is supported in national and local planning policy. The Old Oak project covers portions of the Old Oak and Harlesden Neighbourhood Areas, as identified within the OPDC's Local Plan 2022. The OPDC also adopted the Old Oak West SPD on 28 February 2024; this provides guidance to shape the future of the area, reflecting the OPDC's Local Plan policies and community aspirations.

Consultations and impact assessments

- 4.4. Since 2023, the OPDC has undertaken a programme of public and community engagement on the regeneration of land at Old Oak; and to activate community participation. Workshops, and in-person and online events, have taken place on the Spatial Principles and Illustrative Masterplan; further events are planned. The OPDC has also engaged with the OPDC's Community Review Group and Place Group, as well as other stakeholders (including the host boroughs, the GLA and TfL) on the Illustrative Masterplan proposals.
- 4.5. The OPDC has undertaken formal engagement with the local planning authority. The Illustrative Masterplan was reported to the OPDC's Planning Committee on 19 June 2025.
- 4.6. Engagement with landowners with interests in the Order Land and occupiers has been under way since 2023. Engagement will continue, with a focus on seeking to negotiate with the remaining owners of interests in the Order Land, and occupiers, in accordance with the Land Assembly and Relocation Strategy formally approved by the OPDC Board in February 2025.
- 4.7. An EqIA has been undertaken to assess the likely impacts of the Old Oak CPO and wider regeneration proposals for the Order Land on groups who share relevant protected characteristics. The EqIA demonstrates how the OPDC has discharged the PSED; and sets out planned actions to support compliance through future stages of development.

Conflicts of interest

- 4.8. No conflicts of interest have been identified for anyone involved in drafting this Mayoral Decision (MD).

5. Financial comments

- 5.1. The approved capital budget for the Land Assembly Programme within the red line boundary confirms the required CPO funds within future capital forecasts and budget processes.

- 5.2. Recent cashflow modelling via the finance and funding model affirmed long-term affordability, supporting the GLA's approval of an additional £75m borrowing facility to the OPDC for 2025-26. This provides further assurance on affordability of the CPO within current funding levels.
- 5.3. The Public Land Agreement will define the long-term approach to transferring land to the Development Partner, applying a patient capital methodology and funded through receipts from the development partner.
- 5.4. Additional financial details are included in Part 2 of this MD as they have been deemed commercially sensitive.

6. Legal comments

- 6.1. The OPDC is an MDC established by the Mayor of London to secure the regeneration of the Old Oak Opportunity Area. Under section 207(1) of the Localism Act 2011, the OPDC may, as an MDC, by agreement acquire land in its area or elsewhere. Under section 207(2), the OPDC may acquire land in its area (or elsewhere in Greater London) compulsorily if the Secretary of State authorises it to do so. Under section 207(3), the OPDC must obtain the Mayor's consent before submitting a compulsory purchase order authorising the acquisition of land to the Secretary of State for confirmation. The Mayor is invited to provide that consent in this MD.
- 6.2. In determining whether or not to give his consent required under section 207, there are general powers of the Mayor, acting on behalf of the GLA, in section 30 of the Greater London Authority Act 1999 (GLA Act) to do anything the Mayor considers will further one or more of the GLA's principal purposes. The principal purposes, as set out in section 30(2), are:
 - promoting economic development and wealth creation in Greater London
 - promoting social development in Greater London
 - promoting the improvement of the environment in Greater London.
- 6.3. Section 34 of the GLA Act also allows the Mayor to do anything that is calculated to facilitate, or is conducive or incidental to, the exercise of any functions of the GLA exercisable by the Mayor.
- 6.4. The GLA also has related statutory duties to:
 - pay due regard to the principle that there should be equality of opportunity for all people (section 33(1) of GLA Act)
 - exercise the power in section 30 of the GLA Act in the way it considers is best calculated to:
 - promote improvements in the health of persons in Greater London
 - promote the reduction of health inequalities between persons living in Greater London
 - contribute towards the achievement of sustainable development in the UK
 - contribute towards the mitigation of, or adaptation to, climate change in the UK (section 30(5) of the GLA Act)
 - consult with such bodies or persons as considered appropriate in this particular case (section 32(1) of the GLA Act).
- 6.5. The Mayor should also have regard to the implications of the Human Rights Act 1998 summarised in section 3 of this decision form.

- 6.6. The Mayor should also have regard to section 3 of this decision form in respect of the equalities obligations under the Equality Act 2010.

7. Planned delivery approach and next steps

Activity	Expected timeline
OPDC Board approval to commence land referencing (complete)	February 2025
OPDC Board approval to make the Old Oak CPO; and Mayoral consent to submit the CPO to the Secretary of State for confirmation	July-August 2025
Making of the Old Oak CPO	September 2025
Submission of the CPO to the Secretary of State and service of notices	September 2025
Potential date for Inquiry	May 2026
Inspector's Report	August/September 2026
Secretary of State decision	December 2026
Implementation of CPO, if confirmed	After the Secretary of State's decision

Appendices and supporting papers:

- Appendix 1: Draft Order
- Appendix 2: Draft Order Map
- Appendix 3: OPDC Board Paper (10 July 2025 meeting), including the draft Statement of Reasons, Equalities Impact Assessment and Action Plan, Land Assembly and Relocation Strategy, Illustrative Masterplan and OPDC Planning Committee Report.

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will be published either within one working day after it has been approved or on the defer date.

Part 1 – Deferral

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – YES

ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

Drafting officer:

Alison Murray has drafted this report in accordance with GLA procedures and confirms the following:

✓

Sponsoring Director:

Phil Graham has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.

✓

Mayoral Adviser:

David Bellamy has been consulted about the proposal and agrees the recommendations.

✓

Advice:

The Finance and Legal teams have commented on this proposal.

✓

Mayoral Delivery Board

This decision was agreed by the Mayoral Delivery Board on 11 August 2025.

✓

CHIEF FINANCE OFFICER:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature

Fay Hannan

Date:

11/08/2025

CHIEF OF STAFF:

I am satisfied that this is an appropriate request to be submitted to the Mayor.

Signature:

D. Bellamy

Date:

11/08/2025