

THE OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION (OLD OAK) COMPULSORY PURCHASE ORDER 2025

The Localism Act 2011

and the Acquisition of Land Act 1981

The Old Oak and Park Royal Development Corporation (in this order called "the acquiring authority") makes the following order—

1. Subject to the provisions of this order, the acquiring authority is under section 207 of the Localism Act 2011 hereby authorised to purchase compulsorily the land and the new rights over land described in paragraph 2 for the purpose of the regeneration of Old Oak.
2. (1) The land authorised to be purchased compulsorily under this order is the land described in the Schedule and delineated and shown shaded pink [and hatched pink] on a map prepared in duplicate, sealed with the common seal of the acquiring authority and marked "Map referred to in The Old Oak and Park Royal Development Corporation (Old Oak) Compulsory Purchase Order 2025".

(2) The new rights to be purchased compulsorily over land under this order are described in the Schedule and the land is shown shaded blue and hatched blue on the said map.
3. [Part[s] 2 [and 3] of Schedule 2 to the Acquisition of Land Act 1981 [is][are] hereby incorporated with this order subject to the modifications that [●].]
4. The acquiring authority may not serve a notice to treat or execute a general vesting declaration in respect of this order after the end of the period of three years beginning with the day on which the compulsory purchase order becomes operative.



Title of report: Old Oak and Park Royal Development Corporation (Old Oak) Compulsory Purchase Order 2025

Meeting date: 10 July 2025

Report to: Board

Report of: Gareth Blacker, Executive Director of Delivery

For Decision

This report will be considered in public

1. Summary

- 1.1 This report provides an update on land assembly for the Old Oak Regeneration Proposals (defined below) and seeks authority to secure approval from the Mayor of London to make a compulsory purchase order (CPO) and, subject to receipt of approval, proceed with the making of a CPO.
- 1.2 The formal land referencing process approved by this Board on 5 February 2025 has been undertaken and OPDC now has a much clearer understanding of the land ownership and occupational interests in the land comprised within Old Oak.
- 1.3 The Order Land (defined below) is approximately 31 hectares of which circa 22 hectares is in the ownership of the Department for Transport (DfT), Network Rail (NR), Transport for London (TfL) and London Borough of Ealing (LBE). Since 2023, OPDC has sought to acquire as many interests in the Order Land as possible by private agreement and has successfully acquired circa 7 hectares. This leaves a balance of approximately 2 hectares of land owned by the private sector which is required to facilitate the comprehensive delivery of the Old Oak Regeneration Proposals. The CPO will also allow for the acquisition of rights in, under and over land which are required in order to deliver the Old Oak Regeneration Proposals.
- 1.4 A Collaboration Memorandum of Understanding (MoU) sets out the principles of collaboration among public stakeholders for the project securing a commitment to work towards shared project objectives. This MoU has been agreed with all parties and is in the final stages of approvals.
- 1.5 The negotiations on a Public Land Agreement (PLA) with DfT and NR are progressing well. The PLA will provide certainty that the surplus, non-

operational public land within the ownership of DfT and NR that is required to facilitate the delivery of the Old Oak Regeneration Proposals will be made available. Draft Heads of Terms are at an advanced state of negotiation and it is anticipated that the PLA will be exchanged by the end of this year.

- 1.6 Completing the acquisition of private land interests within Old Oak will provide certainty that all of the land and rights required for the Old Oak Regeneration Proposals will be available. This will also enable the delivery of early phases of the Old Oak Regeneration Proposals.
- 1.7 It is considered that the acquisition of the Order Land using compulsory purchase powers is necessary to facilitate the delivery of the Old Oak Regeneration Proposals.

2. Recommendations

The Board is invited to:

- 2.1 Note the progress made to date to assemble land and interests within Old Oak to facilitate regeneration of the area.**
- 2.2 Approve the making of the CPO**, subject to the Mayor of London's approval, **to acquire the necessary land interests in the Order Land and, as necessary, the creation of new rights** pursuant to section 207(2) of the Localism Act 2011 (the 2011 Act), securing regeneration of the area by facilitating the regeneration of the Order Land identified in Appendix 2 (the Order Land).
- 2.3 Note that the acquisition and/or vesting of the Order Land (including acquisitions by OPDC to date) will enable section 203 of the Housing and Planning Act 2016 to be engaged to override easements and other rights adversely affecting the Order Land and contractual restrictions as to the user of the Order Land** to the extent that the Old Oak Regeneration Proposals will interfere with such easements and other rights or breach such restrictions, subject to planning consent being in place for the Old Oak Regeneration Proposals at the time of the interference or breach.
- 2.4 Delegate to the Executive Director of Delivery authority to take all necessary steps to make the CPO, subject to the approval of the Mayor of London prior to the making, including (but not limited to):**
 - a. following consultation with the Chair of the Board and Chief Executive Officer, amending the Draft Order Plan and finalising the CPO Schedule of Interests before the making of the CPO (if required to give effect to any of the matters delegated pursuant to the recommendation);
 - b. following consultation with the Chair of the Board and Chief Executive Officer, deciding and finalising the precise scope of new rights to be acquired over properties in the Order Land (if required to give effect to any of the matters delegated pursuant to the recommendation);
 - c. submitting the draft CPO to the Mayor of London for approval to make the CPO;

- d. amending and approving the final form of the Statement of Reasons before making the CPO;
- e. amending and approving the Equalities Impact Assessment before making the Order; and
- f. publishing and serving of all notices relating to the making of the CPO;

2.5 Delegate authority to the Executive Director of Delivery to take all necessary steps to seek confirmation of (subject to the consent of the Mayor of London) and thereafter to implement the CPO, including (but not limited to):

- a. seeking the Mayor of London's consent pursuant to section 207(3) of the 2011 Act to submit the CPO to the Secretary of State for confirmation;
- b. agreeing the terms of and entering into any documentation required to settle any property rights / matters necessary to progress the regeneration of the Order Land;
- c. the promotion of OPDC's case at any public inquiry;
- d. negotiating, agreeing terms and entering into agreements with affected parties including agreements for the withdrawal of blight notices and/or the withdrawal of objections to the CPO and/or undertakings not to enforce the CPO on specified terms, including (but not limited to) where appropriate seeking the exclusion of land from the CPO, making provision for the payment of compensation and/or relocation;
- e. if the CPO is confirmed by the Secretary of State or an Inspector under delegated authority, advertising and giving notice of confirmation and thereafter taking all steps to implement the CPO including, as applicable, executing General Vesting Declarations and/or serving Notices to Treat and Notices of Entry in respect of interests and rights in the Order Land; and
- f. taking all steps in relation to any legal proceedings relating to the CPO including defending or settling claims referred to the Upper Tribunal and/or applications to the courts and any appeals.

3. Background

- 3.1 The Old Oak Regeneration Proposals require approximately 31 hectares of land for delivery, 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.
- 3.2 Old Oak comprises a number of sites which are allocated for development in OPDC's Local Plan and the Old Oak West Supplementary Planning Document (SPD) which was adopted by the Board on 28 February 2024. The SPD amalgamated the relevant Place policies in the Local Plan to provide clearer spatial planning guidance for Old Oak. It also emphasised the importance of a comprehensive and coordinated approach to development at Old Oak, the

benefits of which include better placemaking to foster sustainable and complementary neighbourhoods, coordination of infrastructure delivery to connect the area, and the delivery of more homes and jobs.

- 3.3 Prior to its adoption, the SPD was subject to public consultation (including with stakeholders such as the host Boroughs, the Greater London Authority (GLA), Natural England, Historic England, and the Environment Agency).
- 3.4 On 5 February 2025 this Board approved a Regeneration Strategy which sets out six strategic priorities for the successful regeneration of Old Oak: build a place to call home; make a place to be proud of; drive inclusive economic growth; create a thriving environment; deliver at pace; and ensure value.

The Old Oak Regeneration Proposals

- 3.5 The Old Oak Regeneration Proposals are designed to utilise public sector brownfield land and capitalise on the transformational impacts and effects of the new station at Old Oak Common, which will serve HS2 and the Elizabeth Line.
- 3.6 OPDC has secured government support through a Strategic Outline Business Case and Outline Business Case and the subsequent agreement of the MoU between OPDC, Department for Transport, Ministry of Homes Communities and Local Government, High Speed 2 and Network Rail. This MoU reiterates the project objectives; sets out the principles of collaboration among public stakeholders; summarises key roles of the public stakeholders and their respective priorities; and sets out the role and purpose of what is known as the Collaboration and Assurance Board.

Illustrative Masterplan

- 3.7 OPDC has undertaken extensive masterplanning work for Old Oak with support from a consortium of advisors. An Illustrative Masterplan has been prepared based on the spatial principles which were presented to and noted by the Board on 13 June 2024.
- 3.8 The Illustrative Masterplan provides a spatial exemplar of how the Old Oak Regeneration Proposals could be delivered through comprehensive development. It incorporates two new neighbourhoods, with Channel Gate to the north and Old Oak Town Centre to the south, which together would provide around 8,000 new homes, including affordable homes, approximately 150,000-200,000 sqm of new commercial and employment space as well as new social infrastructure, including a primary school, health facilities and leisure centre.
- 3.9 The Illustrative Masterplan was presented to OPDC Planning Committee on 19 June 2025 (this is discussed further in section 4 below). A copy of the Illustrative Masterplan Planning Committee Report is provided at Appendix 7. The Illustrative Masterplan has been considered by this Board for endorsement under agenda item 12 of this meeting and is included in Appendix 6.

- 3.10 The Illustrative Masterplan will inform and form part of a Masterplan Framework Document. This will advance the spatial principles set out in the SPD ahead of the procurement of developer partner(s). This will facilitate further engagement with the local planning authority (LPA) and other key stakeholders, including the GLA, on site-wide principles, development parameters and site-wide delivery strategies, enabling the timely consenting and delivery of the Old Oak Regeneration Proposals. The Masterplan Framework Document is expected to be considered for endorsement by the OPDC Board later in 2025.
- 3.11 The boundary for the Order Land has been refined to reflect ongoing design work and the output of the land referencing exercise.
- 3.12 The Illustrative Masterplan provides a clear indication of how the Old Oak Regeneration Proposals could be delivered. The CPO will be promoted in advance of securing permission for the Old Oak Regeneration Proposals. The intention is to use the Illustrative Masterplan to demonstrate why it is necessary to assemble the Order Land and that the type of development proposed is in general accordance with the planning framework for the area.
- 3.13 It is envisioned that OPDC will complete the assembly of the Order Land in advance of coming to a final decision about the detailed design and content of the Old Oak Regeneration Proposals, which will be informed, in part, by the design solutions proposed by the selected development partner(s).

Land

- 3.14 OPDC's approach to facilitating the delivery of the Old Oak Regeneration Proposals has been to start by focussing on the future availability of public land, the Old Oak West SPD and the emerging spatial principles. Work has then progressed on the Illustrative Masterplan. This has all resulted in OPDC being able to devise a redline boundary for the Illustrative Masterplan and then undertake an initial task, of securing the land required for delivering the Old Oak Regeneration Proposal, noting that the final details of the proposals will be defined once a development partner has been procured.
- 3.15 The intention is for OPDC to assemble the Order Land and in parallel with this process, procure a development partner to deliver the Old Oak Regeneration Proposals.
- 3.16 Through the approved Outline Business Case, the Department for Transport, Network Rail and OPDC committed to work together to enter into a PLA to enable comprehensive regeneration. OPDC is in advanced negotiations on a PLA which will support the delivery of the Old Oak Regeneration Proposals. Heads of Terms are in the process of being finalised with the intention that the agreement will be entered into later this year.
- 3.17 OPDC has taken responsibility for acquiring the Order Land and will work with the development partner, to formulate a suitable financial model for the actual delivery of the Old Oak Regeneration Proposals.
- 3.18 This approach is in line with the recently published Government guidance on the use of compulsory purchase powers by Mayoral Development

Corporations (MDCs), where it is acknowledged that a compulsory purchase order can be progressed for land which is in need of development or regeneration, even though there are no specific detailed development proposals in place.

- 3.19 The commercial advice that OPDC has received indicates that sufficient funding has been secured to complete the assembly of the Order Land.

Formal Land Referencing

- 3.20 On 5 February 2025, the Board approved the commencement of formal land referencing to enable OPDC to have a more detailed and accurate understanding of all land interests and rights likely to be affected by the Old Oak project.

- 3.21 The land referencing exercise has now concluded. Recognising that OPDC now has a better understanding of the interests in the Old Oak boundary and that assembly of all interests and rights required for the regeneration of Old Oak by agreement is unlikely, the Board is asked to approve the use of compulsory purchase powers to facilitate the delivery of the Old Oak Regeneration Proposals.

The Order Land

- 3.22 The Order Land is located within the Old Oak area as shown on the Draft Order Map at Appendix 2.
- 3.23 The Order Land comprises approximately 31 hectares of land located in North Acton. It is bounded by the Old Oak Common Rail Depot, North Pole Rail Depot, Willesden Junction Station and North Acton Station with Victoria Road (A4000) running through the centre of the Order Land.
- 3.24 The Order Land comprises a mix of industrial and commercial units, residential properties, HS2 construction sites, public adopted highways, railway land and sidings. It also includes the Birchwood Nature Reserve to secure public access and improve the overall management of the area.

Procurement of Development Partner

- 3.25 OPDC has undertaken a programme of Early Market Engagement (EME) which focused on engaging with prospective developers and Registered Providers. The purpose was to obtain feedback and help to shape the proposition ahead of the procurement of a private sector partner.
- 3.26 The findings of the EME indicated the need to provide certainty to any proposed development partners and investors that all of the land required to deliver the Regeneration Proposals will be available at the relevant time.
- 3.27 A Procurement Strategy has been developed for which OPDC Board endorsement is sought in the private part of this meeting. OPDC intends to launch the procurement process in late 2025.

The Old Oak Regeneration Proposals

- 3.28 The Old Oak Regeneration Proposals are focussed, primarily, on the development/regeneration of under-utilised public land, of which much will become surplus following the completion of works to construct HS2.
- 3.29 The programme for delivery reflects the anticipated delay in completion of HS2. Whilst there are interdependencies, the Old Oak Regeneration Proposals are not solely dependent on the HS2 programme, and OPDC and HS2 are working very closely together towards shared objectives at Old Oak.
- 3.30 In terms of progressing the Old Oak Regeneration Proposals, OPDC has:
- a. Undertaken extensive work to engage with DfT, Network Rail, CRT and other key stakeholders.
 - b. Completed two rounds of market engagement which has demonstrated strong interest in the project.
 - c. Acquired the majority of the privately owned Order Land (circa 7 hectares).
 - d. Undertaken work to progress the Illustrative Masterplan to demonstrate how the Old Oak Regeneration Proposals could be delivered.
 - e. Prepared a strategy for the procurement of a development partner.
- 3.31 OPDC intends to proceed with the appointment of a development partner and then to progress the submission of a planning application, to enable early phases of the Old Oak Regeneration Proposals to come forward.
- 3.32 In order to achieve this, it will be necessary for OPDC, DfT, Network Rail and the selected development partner, to be confident that all of the land required to deliver the Old Oak Regeneration Proposals will be available. Assembling the Order Land now enables OPDC to provide this certainty.

4. Issues for consideration

- 4.1 This Report sets out the background to and need for the Old Oak Regeneration Proposals, as well as the basis on which it is considered that the compulsory purchase of the Order Land is justified, it being considered that there is a compelling case in the public interest to do so.¹
- 4.2 A Draft Statement of Reasons has been prepared for the proposed Order in accordance with the Government's Guidance on the Compulsory Purchase Process (the **Guidance**) and a copy of this is provided at Appendix [3].

Need for the CPO to ensure delivery of the Old Oak Regeneration Proposals

- 4.3 The CPO is necessary to facilitate the comprehensive delivery of the Old Oak Regeneration Proposals in an appropriate timeframe, recognising that the proposals will be built out over a number of years. Officers do not consider

¹ In line with non-statutory guidance dated January 2025 set out in the *Guidance on compulsory purchase process and the Crichel Down Rules* (the "**Guidance**").

that there are suitable alternatives to the CPO which would deliver the strategic objectives of the Old Oak Regeneration Proposals set out below.

- 4.4 The current fragmented ownership of the Order Land, alongside the early strategic infrastructure required to unlock redevelopment, acts as a barrier to the comprehensive delivery of the Old Oak Regeneration Proposals. There remain separate land interests not in public ownership within the area which need to be acquired by OPDC for coherent and comprehensive development to be carried out.
- 4.5 In line with the Guidance, officers have engaged extensively with landowners with interests in the Order Land and have made significant progress in acquiring those interests by private agreement. However, it has not been possible to acquire all of the interests in the Order Land by agreement and it is highly unlikely that it will be possible to achieve this in a reasonable/ appropriate timeframe.
- 4.6 Irrespective of continuing efforts to negotiate with the remaining owners of interests in the Order Land, officers consider it will be necessary to acquire some interests compulsorily to provide certainty that all land and rights required for the Old Oak Regeneration Proposals will be available.
- 4.7 The Order will also make provision for the interference with third party rights which could impact on the delivering of the Regeneration Proposals.
- 4.8 The Outline Business Case for the project² demonstrated that failure to take action would mean that development in the area would occur on a piecemeal basis resulting in sub-optimal and slower development than if development of the Order Land is facilitated by OPDC. Failure to consolidate existing private land interests through the promotion of the CPO would also prevent the development potential of plots currently in public ownership from being comprehensively delivered.

Strategic objectives of the Old Oak Regeneration Proposals

- 4.9 The comprehensive development of Order Land will enable a strategic approach to delivery including site-wide infrastructure such as community and leisure facilities, utilities, critical new connections and bridges, open space and public realm.
- 4.10 The promotion of the CPO would support the strategic objectives of the Old Oak Regeneration Proposals:³
 - *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;

² See paragraph 3.32(b).

³ These strategic objectives formed part of the Outline Business Case approved in early 2024 by the Ministry of Housing, Communities and Local Government Investment Sub-Committee and Department for Transport Tier 2 Board.

- *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 which is resilient to the climate crisis and positively contributes to people's health, wellbeing and the environment; and
- *Deliver at pace*- Ensure development is well underway by the time Old Oak Common station opens.

4.11 These strategic objectives are considered in further detail in the Draft Statement of Reasons

Government Support for the Old Oak Regeneration Proposals

4.12 The Old Oak Regeneration Proposals have received support at all levels of government.

4.13 At the national level, a Strategic Outline Business Case was approved in early 2022 by the Investment Sub-Committee of the then Department for Levelling Up, Housing and Communities (now the Ministry of Housing, Communities and Local Government) and the High Speed Rail Group Tier 2 Board of the DfT.

4.14 An Outline Business Case for the project was approved in early 2024 by MHCLG Investment Sub-Committee and DfT Tier 2 Board (the OBC).

4.15 The development of both the Strategic Outline Business Case and Outline Business Case was sponsored by Homes England as Government's housing and regeneration agency and supported and inputted into by Network Rail and HS2.

Compliance with the Planning Policy Framework for the Area

4.16 Securing the regeneration of the Order Land is supported in national, regional and local planning policy. There is strong planning policy support within the development plan⁴ and the National Planning Policy Framework (the NPPF) in support of the Old Oak Regeneration Proposals.

4.17 The Illustrative Masterplan and LPA officers' report (the Planning Report) on the Illustrative Masterplan were presented to the OPDC Planning Committee on 19 June 2025 (a copy of the Planning Report is included at Appendix 7). The Planning Report concluded that the proposed site-wide approach to land use, building height, landscape, streets and movement is well-considered and supported in principle.

⁴ The development plan for the OPDC area comprises the West London Waste Plan 2015, London Plan 2021 and the Local Plan 2022.

- 4.18 The Planning Report identified certain elements where further justification was required to demonstrate the accordance of the Illustrative Masterplan with planning policy. The overall conclusion of the Planning Report was that, when assessed as a whole and taking account of the benefits of the scheme (which will be confirmed at a later date), the Illustrative Masterplan is capable of being in accordance with the Local Plan.
- 4.19 Based on the detailed work to date on planning matters, the expected resolution of identified policy issues (as set out in the Draft Statement of Reasons) and the expected adoption of the Masterplan Framework Document, officers are satisfied that there are no obvious reasons why planning permission would be withheld for an application or applications for development broadly consistent with the Illustrative Masterplan.
- 4.20 Having regard to Section 38(6) of the Planning and Compulsory Purchase Act 2004, officers are satisfied that such an application would be likely to accord with the development plan, when read as a whole, and would be supported by a number of additional material considerations including the NPPF, the SPD and Illustrative Masterplan, which would indicate that planning permission ought to be granted for the Old Oak Regeneration Proposals.⁵

5. Risks and issues

- 5.1 Officers have given careful consideration to the statutory powers available to OPDC to promote the making of the CPO. They have also had regard to the advice contained within the Guidance.
- 5.2 The draft Statement of Reasons provides a comprehensive review of the statutory powers and explains why it is considered to be necessary to proceed with the making of the CPO. There is particular reference to the Guidance as it applies to MDCs, recognising the fact that there will be instances where it is necessary to promote a compulsory purchase order to facilitate land assembly in advance of coming forward with detailed proposals for a development.
- 5.3 The promotion of the CPO would not be without risk. It entails the interference with private rights and the loss of homes and business. It can cause disruption and uncertainty to those immediately affected and the wider local community.
- 5.4 Officers have been cognisant of the risks associated with the promotion of a compulsory purchase order and have sought to engage extensively with key stakeholders, individual owners and occupiers and the wider community, with the aim of explaining the Old Oak Regeneration Proposals. There has been a strong focus on acquisition of land by private treaty. This has been very successful. However, for reasons explained earlier in this report, it will not be possible to acquire all land and interests by private treaty. There is also a desire to deliver at pace.
- 5.5 The intention is to promote the CPO, in conjunction with continued engagement with landowners and interested parties, with a view to acquiring as many outstanding interests as possible. However, there will be some

⁵ The planning policy position is considered in greater detail in the Draft Statement of Reasons.

parties who will be adamant that they do not wish to dispose of their interest in the Order Land and who will wish to object and maintain their objection. There is therefore a strong likelihood that there will be objections to the CPO and that the Secretary of State will appoint an inspector to hear those objections at a public local inquiry.

- 5.6 There are likely to be numerous grounds of objection, ranging from 'no need to make a CPO' through to 'a failure to offer sufficient compensation'. OPDC will need to carefully consider and respond to each objection.
- 5.7 The work undertaken to date demonstrates that there is a strong case and justification for making the CPO. Officers are confident that the majority of objections will be resolved and that the Secretary of State will ultimately confirm the CPO, as there is clearly a compelling case in the public interest for assembling the Order Land, in order to facilitate the delivery of the Old Oak Regeneration Proposals.

6. Equality comments

Equality Impact Assessment

- 6.1 Section 149 of the Equalities Act 2010 created the Public Sector Equality Duty (PSED).
- 6.2 Section 149(1) provides:
- "Public sector equality duty*
- (1) A public authority must, in the exercise of its functions, have due regard to the need to—*
- (a) eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act;*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it."*
- 6.3 In deciding whether to take to any initial steps to prepare for the potential making of a CPO and as part of the process of considering any related recommendations contained within this report, OPDC must have due regard to its Public Sector Equality Duty. Consideration must also be given to whether, if an eventual decision is made to go ahead with a CPO, it would be possible to mitigate any adverse impacts on a protected group or to take steps to promote equality of opportunity by, for example, treating an affected group more favourably.
- 6.4 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.⁶

- 6.5 Mindful of its PSED, OPDC appointed AECOM to undertake an equalities impact assessment (EqIA) of the emerging Old Oak Regeneration Proposals, including the potential impacts of a CPO. This was to ensure that potential adverse impacts, especially in respect of individuals or groups with protected characteristics were identified as soon as possible and appropriate mitigation measures put in place.
- 6.6 A copy of the draft EqIA is provided at Appendix [4]. AECOM's report contains an action plan which, along with the Land Assembly and Relocation Strategy (see below), sets out measures to support affected residents and businesses and to ensure that there is suitable and appropriate mitigation for those with protected characteristics. The EqIA will be finalised prior to the making of the proposed CPO.

Land Assembly and Relocation Strategy (LARS)

- 6.7 OPDC has prepared a LARS, a copy of which is provided at Appendix [5]. The strategy sets out the relocation assistance that will be offered to all owners, occupiers and residents of Old Oak affected by the Old Oak Regeneration Proposals, regardless of whether a compulsory purchase order is made and exercised against their interests or their interests are privately acquired.
- 6.8 The relocation strategy will be kept under review and may be updated as negotiations progress. Any update (other than minor changes) will be presented to the Board for approval.

7. Financial implications

- 7.1 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.
- 7.2 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 OPDC for FY25/26. This provides further assurance on affordability of the CPO within current funding levels.
- 7.3 The PLA 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.

⁶ 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.

8. Legal implications

Statutory Power to promote the CPO

- 8.1 The main legal implications arising from this report relate to the lawfulness of the use of powers under section 207 of the Localism Act 2011 to make a CPO.
- 8.2 There is also a need for OPDC to be aware of its PSED (discussed in section 6 above) and duties under the Human Rights Act 1998 (discussed below) by taking appropriate steps to ensure compliance with these duties.
- 8.3 The CPO will facilitate the acquisition of land and rights in the Order Land, which are required to facilitate the delivery of the Old Oak Regeneration Proposals. OPDC must act within the constraints of section 207 of the Localism Act 2011 and seek to comply with the Guidance.

Section 203: overriding easements and other rights

- 8.4 Section 203 of the Housing and Planning Act 2016 enables the overriding of easements and other rights. More precisely, it enables any person to carry out building or maintenance work or to use land even if the works or use would interfere with an easement or other right or breach a contractual restriction on the user of land or a conservation covenant, provided (to the extent relevant to OPDC) that:
 - a. there is planning consent for the work or the use of the land;
 - b. the work or use is carried out after the land has become vested in or acquired by a specified authority (OPDC is a specified authority);
 - c. the authority could acquire the land compulsorily for the purposes of the building or maintenance work or, in the case of use of the land, erecting or constructing any building or carrying out any works for that use; and
 - d. the work or use is for purposes related to the purposes for which the land was vested or acquired.
- 8.5 Section 203 does not extinguish the rights. It only allows the rights to be interfered with for the relevant specific works or use of land.
- 8.6 Such an interference would normally give rise to an action for private nuisance, the remedies for which include an injunction and damages. Section 203 converts this entitlement to bring an action for private nuisance into a statutory entitlement to compensation.
- 8.7 The land referencing exercise has identified a number of rights which affect the Order Land. If the CPO is made, the owners of these rights will receive notice of its making and will have an opportunity to object to the CPO and engage with OPDC regarding compensation.
- 8.8 In addition, a scheme of this nature is likely to result in interference with rights of light. It is therefore appropriate to be able to utilise the powers under section 203 to interfere with such rights, subject to the payment of compensation. Actual rights of light impacts will depend on the detailed scheme that will be

delivered by OPDC and its developer partner(s) and will be assessed at the relevant stage in the future, once the detail of the proposals is known.

- 8.9 Officers consider that there is a compelling case in the public interest to engage section 203 to override easements and other rights affecting the Order Land in order to reduce risks to delivery of the Old Oak Regeneration Proposals. This includes addressing the risk of injunctions or threat of injunctions prohibiting infringements of rights to light, as well as the risk of enforcement of rights which have not been identified in the land referencing exercise.
- 8.10 Reliance on section 203 is considered to be a proportionate means of delivering the regeneration in order to achieve the public benefits of those proposals and in such a way that outweighs the infringement of the human rights of the owners of those easements or other rights, particularly given that statutory compensation will be available to those owners.
- 8.11 The acquisition and/or vesting of the Order Land (including acquisition by private agreement) will enable OPDC and its developer partner(s) deriving an interest in the Order Land from OPDC to rely on section 203 once planning consent is in place for the Old Oak Regeneration Proposals.

Human Rights

- 8.12 The Human Rights Act 1998 places a direct obligation on OPDC to 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 Old Oak Regeneration Proposals.
- 8.13 As a public authority, OPDC must not act in a way which is incompatible with a Convention right protected by the 1998 Act. In particular, in the context of the proposed CPO, OPDC must 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).
- 8.14 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 OPDC's powers. Any interference with a Convention right must be necessary and proportionate.
- 8.15 Given the significant public benefits which would arise from the implementation of the Old Oak Regeneration Proposals and having regard to the extent of the interference with parties' rights and the measures being put in place under the EqlA action plan and the LARS, the advice is that the making and, if confirmed, implementation of the CPO would be necessary and proportionate and would not amount to an unlawful interference with individual property rights.

9. Conclusions and next steps

- 9.1 Subject to the Board's approval, officers will seek approval from the Mayor of London to make the CPO and to submit it to the Secretary of State for confirmation. This will follow a technical review of the draft CPO by the National Planning Casework Unit which may result in minor amendments to the draft CPO and related documentation.
- 9.2 The making of the CPO will be publicised in accordance with sections 11 and 12 of the Acquisition of Land Act 1981. Press notices will be published and site notices put up. Notices will also be sent to affected landowners listed in the CPO schedule, known as qualifying persons. Qualifying persons will be given at least 35 days to submit objections to the Secretary of State. This is 14 days more than the statutory minimum and is to account for the fact that objection period is likely to fall during summer school holiday period, when people may be away.
- 9.3 If there are objections from qualifying persons which have not been withdrawn at the end of the objection period, the Secretary of State will arrange for a public local inquiry to be held to consider the objections. The Secretary of State can also consider the objections by way of written representations but only with the agreement of all the objectors. This is unlikely.
- 9.4 The Secretary of State will decide whether to determine the case herself or appoint an inspector to make the confirmation decision on her behalf. She, or an inspector appointed on her behalf, can decide to confirm the CPO, confirm it with modifications or not to confirm the CPO.
- 9.5 Within six weeks of confirmation, OPDC must publish a confirmation notice and notify qualifying persons of the confirmation. There is a six-week period after publication of that notice within which the confirmation can be challenged in legal proceedings.
- 9.6 Officers will update the Board on the progress of the CPO, if made.

Appendices (Appendix 7 is attached as a link)

Appendix 1: Old Oak - Draft Order

Appendix 2: Draft Order Map

Appendix 3: Draft Statement of Reasons

Appendix 4: Draft AECOM Equalities Impact Assessment

Appendix 5: Land Assembly and Relocation Strategy

Appendix 6: Illustrative Masterplan OPDC Board Paper [agenda item 12]

Appendix 7: [Old Oak Masterplan- OPDC Planning Committee Report](#)

Background papers

[5 February Board – Land Assembly Report](#)

[Strategic Outline Business Case](#)

[Strategic Outline Business Case - Appendices](#)

[Outline Business Case \(Old Oak West Outline Business Case December 2023 - Redacted.pdf\)](#)

[Outline Business Case - Appendices](#)

[OPDC Regeneration Strategy](#)

[Old Oak West Supplementary Planning Document \(SPD\)](#)

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THE OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION (OLD OAK) COMPULSORY PURCHASE ORDER 2025

The Localism Act 2011
and the Acquisition of Land Act 1981

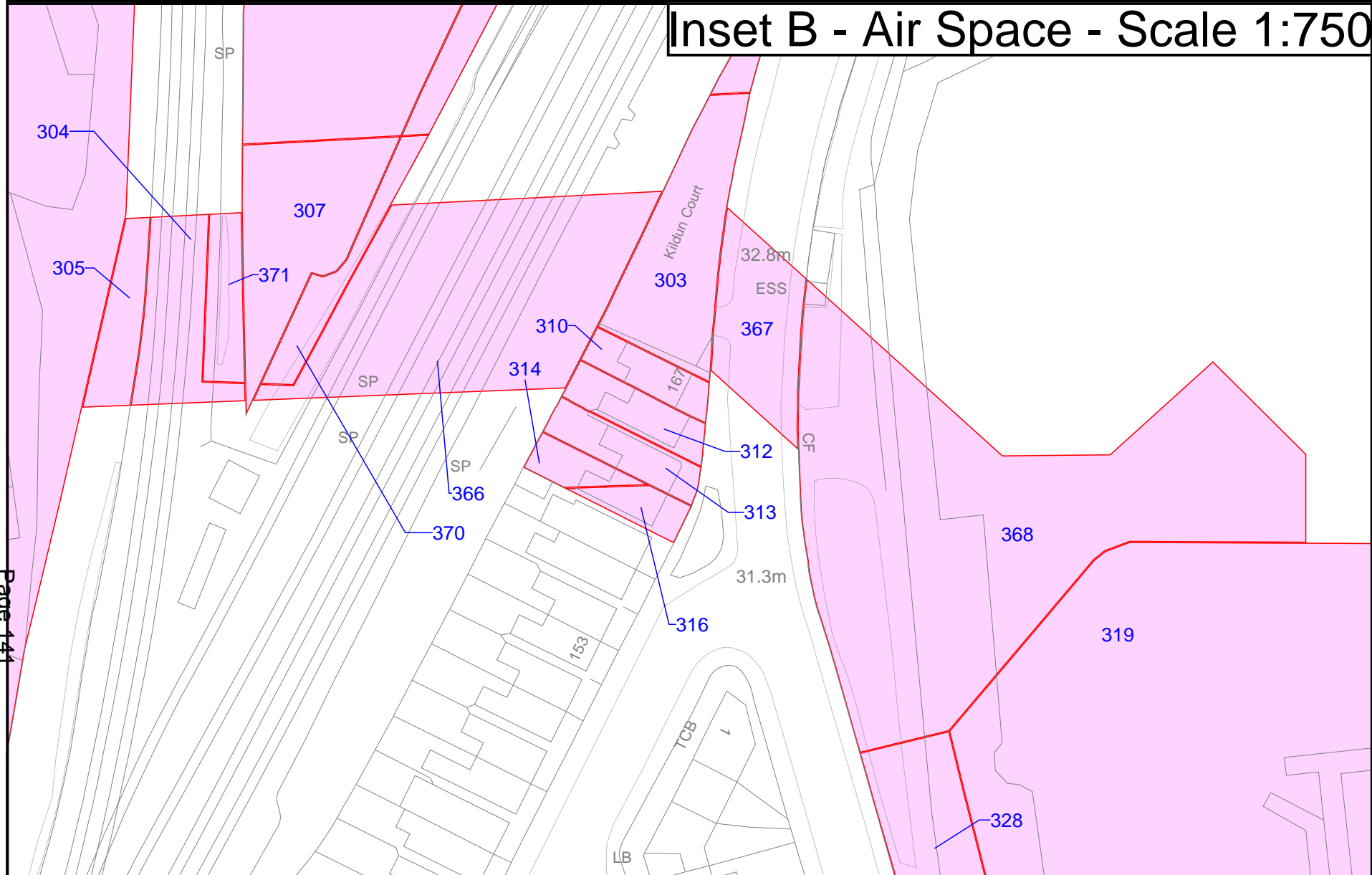
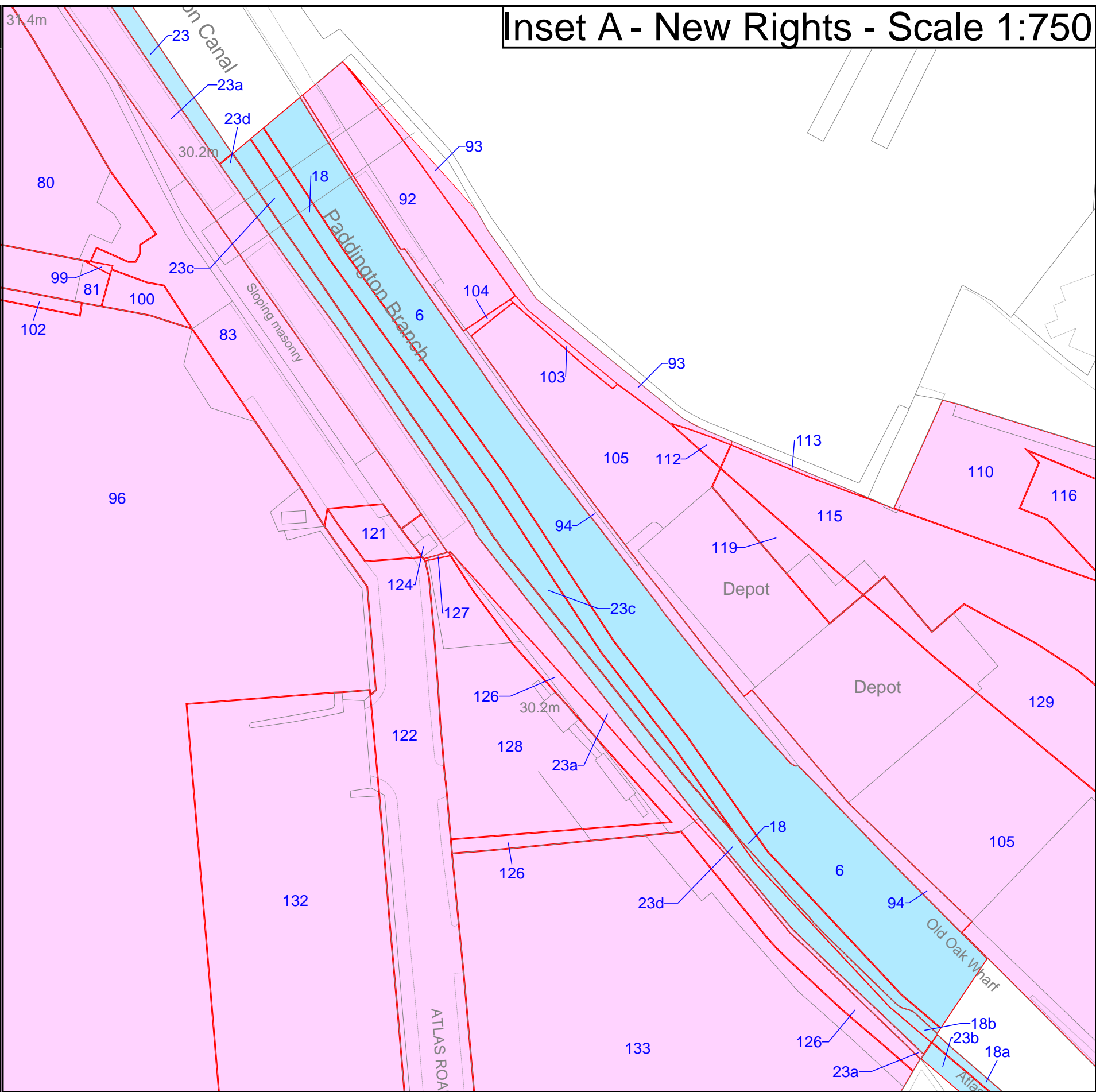
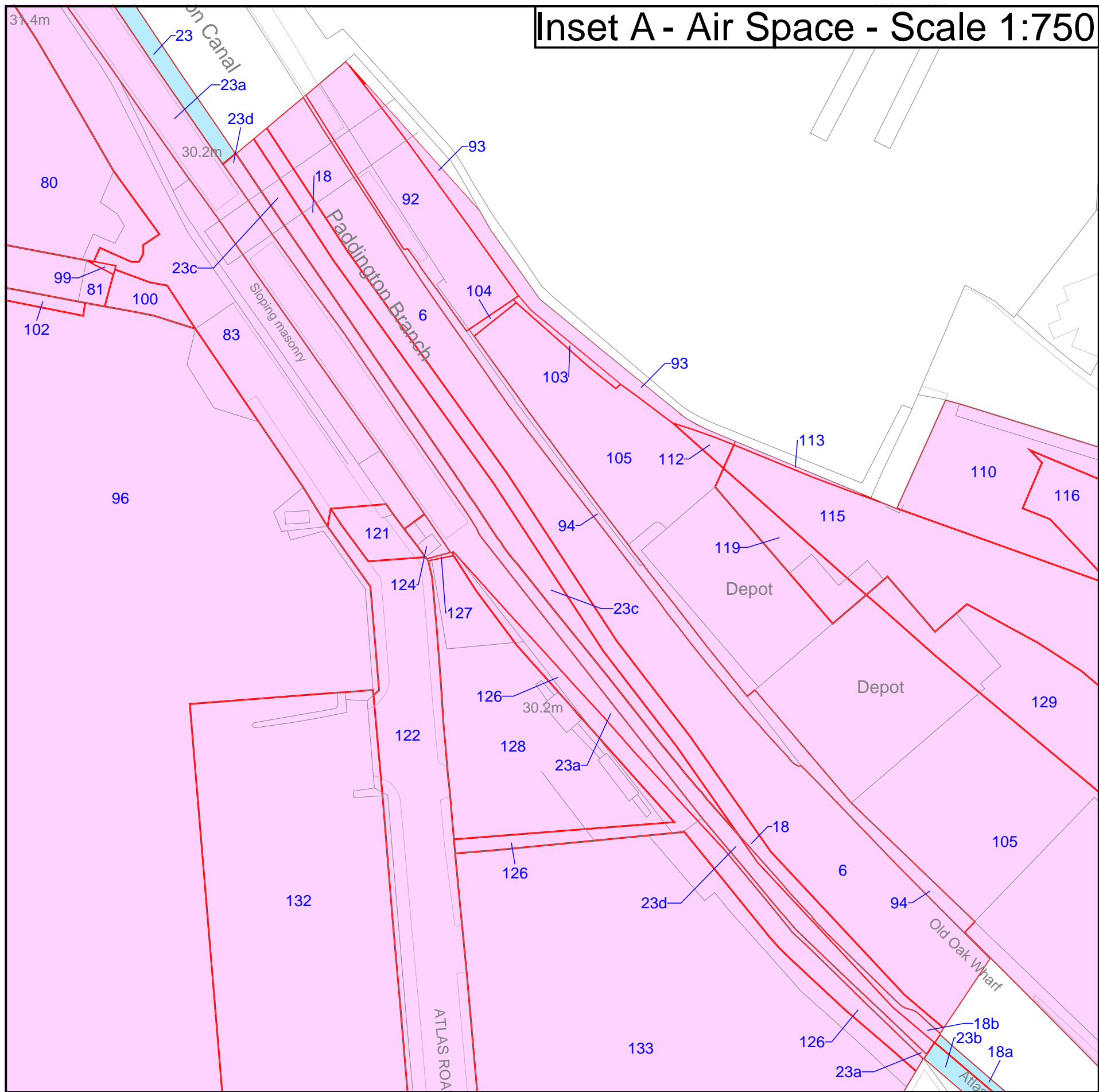
Appendix 1

The Old Oak and Park Royal Development Corporation (in this order called "the acquiring authority") makes the following order—

1. Subject to the provisions of this order, the acquiring authority is under section 207 of the Localism Act 2011 hereby authorised to purchase compulsorily the land and the new rights over land described in paragraph 2 for the purpose of the regeneration of Old Oak.
2. (1) The land authorised to be purchased compulsorily under this order is the land described in the Schedule and delineated and shown shaded pink [and hatched pink] on a map prepared in duplicate, sealed with the common seal of the acquiring authority and marked "Map referred to in The Old Oak and Park Royal Development Corporation (Old Oak) Compulsory Purchase Order 2025".

(2) The new rights to be purchased compulsorily over land under this order are described in the Schedule and the land is shown shaded blue and hatched blue on the said map.
3. [Part[s] 2 [and 3] of Schedule 2 to the Acquisition of Land Act 1981 [is][are] hereby incorporated with this order subject to the modifications that [●].]
4. The acquiring authority may not serve a notice to treat or execute a general vesting declaration in respect of this order after the end of the period of three years beginning with the day on which the compulsory purchase order becomes operative.

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APPENDIX 3

**LOCALISM ACT 2011
ACQUISITION OF LAND ACT 1981
OLD OAK AND PARK ROYAL DEVELOPMENT
CORPORATION (OLD OAK) COMPULSORY PURCHASE
ORDER 2025**

DRAFT STATEMENT OF REASONS

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GLOSSARY

Term	Definition
1981 Act	Acquisition of Land Act 1981 – governs the process of compulsory purchase in England and Wales
1990 Act	Town and Country Planning Act (TCPA) 1990
2008 Act	Housing and Regeneration Act 2008 – legislation relevant to housing and regeneration powers
2011 Act	The Localism act of 2011 – legislation that provides powers to Mayoral Development Corporations such as OPDC
CPO	Compulsory Purchase Order
DfT	Department for Transport
ECHR	European Convention on Human Rights
EME	Early Market Engagement
EqIA	Equalities Impact Assessment
GLA	Greater London Authority
Illustrative Masterplan	The Illustrative Masterplan is a spatial representation of how the Regeneration Proposals could be delivered. It will inform and form part of the Masterplan Framework Document.
LPA	Local Planning Authority
Local Plan	The OPDC Local plan adopted on the 22 June 2022
Masterplan Framework Document	The Masterplan Framework for Old Oak will set out parameters and guidance for the Regeneration Proposals, including development quantum, land use mix and distribution, building heights and site-wide infrastructure such as social infrastructure, connectivity, landscaping and public realm
MoU	The collaborative Memorandum of Understanding between OPDC, MHCLG, DfT, HS2 & Network Rail
MHCLG	Ministry of Housing, Communities and Local Government
NPPF	The National Planning Policy Framework
OBC	Outline Business Case for the project approved in early 2024 by the MHCLG and DfT
Old Oak	A regeneration area within the OPDC Area, subject to the CPO
Old Oak West SPD	Old Oak West Supplementary Planning Document - A supplementary planning document adopted on 28 February 2024 that provides a planning framework to shape the future of Old Oak reflecting OPDC's Local Plan policies and community aspiration.
OPDC	Old Oak and Park Royal Development Corporation
Order	The Old Oak and Park Royal Development Corporation (Old Oak) Compulsory Purchase Order 2025
Order Land	The land subject to the order

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Order Map	The map accompanying the Order which identifies the Order Land
PLA	Public Land Agreement – an agreement to be entered into between OPDC, Network Rail Infrastructure Limited and the Secretary of state for Transport enabling OPDC to acquire the non operational interests of Network Rail Infrastructure Limited and the Secretary of State for Transport required for the Regeneration Proposals
PSED	Public Sector Equality Duty – A legal obligation under the Equality Act 2010
Regeneration Proposals	The comprehensive mixed-use regeneration of the Order Land and Old Oak, as described at Section 4 of this document and shown indicatively in the Illustrative Masterplan
Regeneration Strategy	A set of principles for the Regeneration of Old Oak approved by the OPDC board on 5 February following public consultation and engagement
Secretary of State	Secretary of State for the Ministry of Housing, Communities and Local Government
SOBC	Strategic Outline Business Case – Approved in early 2022 by DLUHC (now MHCLG) and DfT
TfL	Transport for London
The Guidance	The Guidance on the compulsory purchase process and the Crichel Down Rules
The Schedule	The Schedule to the Order
WLO	West London Orbital

1. INTRODUCTION

- 1.1 This document is the Statement of Reasons of the Old Oak and Park Royal Development Corporation ("**OPDC**") in support of the making of the Old Oak and Park Royal Development Corporation (Old Oak) Compulsory Purchase Order 2025 (the "**Order**").
- 1.2 The Order was made by OPDC on [●] pursuant to a resolution of the OPDC Board dated [●]. OPDC intends to submit the Order to the Secretary of State for Housing, Communities and Local Government (the "**Secretary of State**") for confirmation and has obtained the consent of the Mayor of London to do so. If confirmed by the Secretary of State, the Order will enable OPDC to acquire compulsorily the land and new rights included in the Order.
- 1.3 The Order was made pursuant to section 207(2) of the Localism Act 2011 (the "**2011 Act**") in order to acquire land and new rights for the purpose of carrying out OPDC's object, namely to secure the regeneration of the Old Oak and Park Royal development area (the "**OPDC Area**"), and in particular for the purpose of the regeneration of an area of land known as "**Old Oak**".
- 1.4 The OPDC Area covers approximately 650 hectares of land in north west London within the London Boroughs of Ealing, Brent, and Hammersmith and Fulham. The land subject to the Order (the "**Order Land**") lies within Old Oak and comprises approximately 31 hectares and is more fully described in Section 3 of this Statement of Reasons.
- 1.5 OPDC's mission across the OPDC Area is to capitalise on the significant HS2 and Elizabeth Line (Crossrail) investment at Old Oak Common to deliver high quality homes and jobs to facilitate London and UK growth and global competitiveness.
- 1.6 OPDC therefore intends to facilitate the delivery of the Regeneration Proposals (described in greater detail in Section 4 below). The Regeneration Proposals at Old Oak are envisaged to comprise the creation of a new urban district that will become a major new gateway between the capital and the rest of the country. The arrival of HS2 and the Elizabeth Line into Old Oak Common Station will significantly improve public transport access to the area, providing the opportunity for Old Oak to become a high-density mixed-use area.
- 1.7 The proposals include the delivery of approximately 8,000 new homes approximately 150,000 – 200,000 sqm of new commercial and employment space, new active travel routes and bridges, new parks and open spaces, a three form primary school and leisure, health and community provision. The Regeneration Proposals will strengthen physical and social connections between Old Oak and established communities in Harlesden, Park Royal and North Acton to create a strong sense of place built on the character of these surrounding areas.
- 1.8 Old Oak is centrally located within the OPDC Area. It stretches from Willesden Junction station in the north, to North Acton in the south and to the east it includes the new Old Oak Common HS2/Elizabeth Line and national rail station. The Order Land comprises approximately 31 hectares of land, the vast majority of which is brownfield land.
- 1.9 As will be explained in more detail below, 94% of the 31 hectare site comprised within the Order Land is already in public ownership, much of which is already or will become (as the development of HS2 progresses towards completion) surplus to HS2's requirements. As will be seen from the table below:

Land Category	Approximate Area (Hectares /ha)	Percentage of Order Land (c31 ha)
Land in Public Ownership	29	94%
- Of which DfT/Network Rail (which is within the PLA)	21	68%

- TfL/London Borough of Ealing (is not in the PLA)	1	3%
- Of which OPDC	7	23%
Land in Private Ownership	2	6%
Total Order Land	31	100%

1.10 The acquisition of the outstanding private interests in Order Land, coupled with the removal of other interests and restrictions in respect of the remainder of the Order Land, will pave the way for the major regeneration of this area.

1.11 Securing the regeneration of the Order Land is supported in national, regional and local planning policy. The London Plan, OPDC's Local Plan 2022, West London Waste Plan 2015 and the Harlesden Neighbourhood Plan 2019 form the development plan pursuant to which the Order Land will be redeveloped. The Order Land covers portions of the Old Oak Neighbourhood Area and Harlesden Neighbourhood Area as identified within OPDC's Local Plan 2022. OPDC also adopted the Old Oak West Supplementary Planning Document (SPD) on 28 February 2024 which provides guidance to shape the future of the Order Land reflecting OPDC's Local Plan policies and community aspirations. The land which was referenced in the Old Oak West SPD as 'Old Oak West' substantially correlates with the land now referred to in this Statement of Reasons as 'Old Oak'.

1.12 The current fragmented ownership of the Order Land, alongside the early strategic infrastructure required to unlock the redevelopment of the Order Land act as a barrier to the regeneration of the Order Land and Old Oak as a whole.

1.13 OPDC has sought to acquire as many interests in the Order Land as possible. In this regard it will be entering into contractual arrangements with the Department for Transport ("**DfT**") and Network Rail to secure the future transfer of their non-operational interests in the Order Land. It has also sought to acquire privately owned interests in the Order Land by way of agreement. It has successfully acquired c.7 hectares of land within the Order Land boundary prior to making the Order. However, OPDC has not been able to acquire all of the interests in the Order Land and it is highly unlikely that it will be possible to achieve this, within a reasonable/appropriate timeframe. The main outstanding interests are set out in section 5 below. OPDC will continue to negotiate with the owners of interests in the Order Land in parallel to seeking confirmation of the Order with a view to, so far as possible, bringing forward site assembly by private agreement but it is recognised that some interests will need to be acquired compulsorily in order to provide certainty that all land and rights required for the regeneration of Old Oak will be available.

1.14 The regeneration of Old Oak is supported at all levels of government. At the national level, a Strategic Outline Business Case ("**SOBC**") was approved in early 2022 by the Investment Sub-Committee of the then Department for Levelling Up, Housing and Communities (now the Ministry of Housing, Communities and Local Government ("**MHCLG**") and the High Speed Rail Group Tier 2 Board of the DfT. An Outline Business Case ("**OBC**") for the project was approved in early 2024 by the MHCLG Investment Sub-Committee and DfT Tier 2 Board. The development of both the SOBC and OBC was sponsored by Homes England as Government's housing and regeneration agency and supported and inputted into by Network Rail and HS2.

1.15 OPDC is firmly of the view that there is a compelling case in the public interest to use its powers of compulsory acquisition to facilitate the delivery of the regeneration of Old Oak.

- 1.16 This Statement of Reasons has been prepared in accordance with the non-statutory guidance dated January 2025 set out in the *Guidance on compulsory purchase process and the Cribel Down Rules* (the "**Guidance**").

2. OLD OAK AND PARK ROYAL DEVELOPMENT CORPORATION AND ITS POWERS

2.1 OPDC was established on 1 April 2015 under The Old Oak and Park Royal Development Corporation (Establishment) Order 2015, following designation by the Mayor of London of the OPDC Area as a Mayoral development area under section 197 of the 2011 Act.

2.2 Under section 201 of the 2011 Act, the object of OPDC is to secure the regeneration of the OPDC Area. OPDC may do anything it considers appropriate for the purposes of its object or for the purposes incidental to those purposes.

2.3 Under section 206 of the 2011 Act, OPDC may carry out or facilitate:

- a. the acquisition and improving of land;
- b. the carrying out of building and other operations on land;
- c. the creation of an attractive environment;
- d. the regeneration or development of land; and
- e. the more effective use of land.

2.4 Under section 207(2) of the 2011 Act, OPDC has the power to compulsorily acquire land in its area, or elsewhere in Greater London, if the Secretary of State authorises it to do so. The purposes for which OPDC may compulsorily acquire land are set by section 201(4) of the 2011 Act which provides that the powers are to be exercised for the purposes of OPDC's object or for purposes incidental to those purposes.

2.5 Section 207(4) of the 2011 Act provides that the power for OPDC to acquire land under section 207(2) includes the power to acquire new rights over land.

2.6 The Order was made pursuant to section 207(2) of the 2011 Act for the purpose of carrying out OPDC's object, namely to secure the regeneration of the OPDC Area, in particular the regeneration of land at Old Oak.

3. THE ORDER LAND

Location and description

3.1 The Order Land is located within a part of the OPDC Area known as Old Oak.

3.2 Old Oak includes areas of land in the London Borough of Ealing, the London Borough of Hammersmith and Fulham and smaller portions of land in the London Borough of Brent. It covers portions of the Old Oak Neighbourhood Area and Harlesden Neighbourhood Area (as allocated in OPDC's Local Plan).

3.3 The Order Land comprises approximately 31 hectares of land. It is bounded by the Old Oak Common Rail Depot, North Pole Rail Depot, Willesden Junction Station and North Acton Station with Victoria Road (A4000) running through the centre of the Order Land. The Order Land comprises a mix of industrial and commercial units, residential properties, HS2 construction sites, public adopted highways, canal, towpaths, railway land and sidings.

3.4 A summary description of the Order Land is set out as follows:

- (a) Air space above Canal and towpath (Atlas Wharf and Old Oak Wharf, Grand Union Canal, Paddington Branch) situated to the northeast of Atlas Road, west of the Collective.
- (b) Railway works and land (South West Sidings, Willesden to Acton Wells Line), south of Willesden Junction Station and east of Old Oak Lane; commercial premises Units 1-5, 86 Goodhall Street; Units 1 and 3 and electrical apparatus, Ursula Lapp Estate; buildings, yard and premises at Greater London House, 1 Old Oak Lane; yards, scrubland and Units 2-3, Radford Estate; private road (part of Goodhall Street); and the Fisherman's Arms Public House, Old Oak Lane.
- (c) Car parks, accessways, embankment, construction site and private road (Atlas Road); waste transfer station, premises, car parks and electricity sub-station north of The Collective, west of the Grand Union Canal and north of Old Oak Lane; and construction site, car park, telecommunication masts and commercial premises, 55 Victoria Road.
- (d) Towpath and embankment (Grand Union Canal, Paddington Branch); residential building and premises (Power House), Old Oak Lane; residential yards, gardens and premises at 2a and 2b, 4a and 4b, 6a and 6b, 8a and 8b Victoria Terrace, Old Oak Lane.
- (e) Towpath, part of footbridge and embankment (Grand Union Canal, Paddington Branch); open space; grassland and buildings north of Easton Court, Union Way; private roads (Loverose Way and Union Way); café, car parks, yards and commercial premises, Old Oak Common Lane; railway embankment, west of Old Oak Common Lane; HS2 construction site, east of Wells House Road and Old Oak Common Lane.
- (f) Air space above public adopted highway (Old Oak Common Lane); air space above railway works and land (North London Line, West London Line and Dudding Hill Line); hardstanding and scrubland south of Midland terrace; part of car park at Shaftsbury Gardens, Midland Terrace; residential premises at 46 Midland Terrace, 1-9 Kildun Court, Old Oak Common Lane, and 161-167 (odd) Wells House Road; public adopted highways (Bethune Road and St. Leonard's Road); construction sites and electricity sub-stations east and west of Victoria Road; storage tanks south of Chase Road Trading Estate; yards, car parks and commercial premises at Boden House, 112-140 Victoria Road; 99 Victoria Road; Lewis House, 3 School Road; and part of Pilot Industrial Centre, 5-9 School Road.
- (g) Railway works and land (London Underground, Central Line); London Underground Station (North Acton); open land (North Acton Square); Hotel (Holiday Inn Express, London Park Royal); café (Station Café, Victoria Road); and part of access road, Victoria Industrial Estate, Victoria Road.

3.5 The Order Land is more specifically described in the schedule of interests accompanying the Order and is identified in the Order map.

3.6 All of the interests in the land shown pink on the Order map are to be acquired, save for those interests which are specifically excluded in the Schedule to the Order which includes interests owned by the Crown. The Order also makes provision for the following new rights to be acquired over the land shown shaded blue on the Order map:

- a) To construct, inspect, maintain, install, disconnect, alter, divert, reconnect and renew service media and relay water, sewage, gas, electricity, telecommunications and other services located on the land along with the right to the free passage and running of such services through the service media.
- b) To carry out works to inspect/ maintain/ upgrade/ renew/ replace/ remove existing bridge(s).
- c) To carry out works to construct/ inspect/ maintain/ upgrade/ renew/ replace/ remove new bridge(s) and associated structures, including foundations.
- d) To carry out construction works, including surveys and/or demolition of existing structures, as required to deliver the regeneration scheme.
- e) To pass and repass over the land at all times now or in future on foot or with vehicles of whatever type and with or without materials, plant or machinery for all purposes in connection with access to and egress from any part of the regeneration scheme.
- f) To oversail cranes.
- g) To oversail with new bridge and associated structure.
- h) To prevent any works or use of the land that would prevent those works from being carried out.

3.7 The order will also make provision for the interference with third party rights which could impact on the delivering of the Regeneration Proposals.

4. **REGENERATION PROPOSALS**

Context

- 4.1 The London Plan identifies that the OPDC Area can deliver circa 25,000 homes and 65,000 jobs, making it one of London's and the UK's largest regeneration areas. The development of Old Oak, including the Order Land, would go a significant way towards meeting this target and represents a major opportunity to ensure that these new homes and jobs are located sustainably, close to a major new transport hub on predominantly brownfield land, most of which is already owned by the public sector.
- 4.2 The existing primary land uses within the OPDC Area include Strategic Industrial Location, land for mixed-use development, existing residential neighbourhoods, Metropolitan Open Land and green space. To the west of Old Oak is Park Royal, London's largest industrial estate. Park Royal provides a vital link in London and the UK's supply chain of food, film and theatre, construction and retail. To the east of Old Oak is primarily industrial land, occupied by a major used car dealership and waste functions. There are two hospitals, Hammersmith and Central Middlesex, within 500m of the OPDC Area.
- 4.3 When Old Oak Common Station is operational, there will be rapid train links (via HS2, the Elizabeth Line and the Great Western Railway) to established innovation zones including Euston, Barts Life Sciences, Birmingham Innovation Quarter and Oxford. Old Oak Common Station is set to become the second largest rail station in London and the largest sub-surface station to have been built in the UK. The station will support the wider Old Oak area in becoming a new strategic destination, 10 minutes from Heathrow and central London.
- 4.4 Intervention is required at Old Oak to overcome a fragmented local area both spatially and in terms of land ownership and to stitch these together to realise the opportunities for mobility, connection and innovation arising from the existing uses in the OPDC Area and the new Old Oak Common Station.
- 4.5 The overarching vision for Old Oak is to build a place where residents, businesses and visitors will benefit from the social and economic opportunities that regeneration offers, and the plans will promote equitable growth and enhance lived experience. With the new Old Oak Common interchange at its heart, Old Oak will become a major new gateway between the capital and the rest of the country, and an attractive new canalside neighbourhood. New and diverse workplaces and carefully integrated public realm and green spaces will create a sustainable and multi-faceted urban community where people are proud to live, work and visit.
- 4.6 The vision is also to deliver a mix of housing types and tenures to complement the diversity of the area, supporting the mayor's policy of delivering a high proportion of affordable housing. Alongside new homes, Old Oak also has plans for new workspace, with opportunities for innovation and production facilities, as well as new retail and cultural space, and essential community and social infrastructure. This will create a centre for growth, innovation, and productivity, driving excellence in high tech, life sciences and green industries by connecting into the plans for a new West Tech corridor, a science, technology and innovation hub planned by Imperial College London. The area has a clear industrial, culinary, and creative heritage in Park Royal, and the vision is to build on this, integrating existing communities and businesses with the innovative new workspaces, institutions, facilities, and public realm to define Old Oak both as a thriving, creative hub and an important and popular destination.

The Regeneration Proposals

- 4.7 OPDC's purpose in making the Order is to facilitate the comprehensive mixed-use regeneration of the Order Land and Old Oak (the "**Regeneration Proposals**") in order to deliver the vision described above. The Regeneration Proposals are envisaged to comprise the creation of a new urban district that will become a major new gateway between the capital and the rest of the country. The proposals include the delivery of approximately 8,000 new homes , including

affordable housing, 150,000 – 200,000 sqm of new commercial and employment space, new active travel routes and bridges, new parks and public open space, a three form primary school and leisure, health and community provision on the Order Land. The Regeneration Proposals will strengthen physical and social connections between Old Oak and established communities in Harlesden, Park Royal and North Acton to create a strong sense of place built on the character of these surrounding areas.

4.8 In addition, this development and redevelopment is expected to catalyse and facilitate the delivery of additional new homes and commercial and employment uses in the wider Old Oak area. The Regeneration Proposals will result in a new urban district comprising successful neighbourhoods structured by streets framed by active frontages and networks of new landscaped walking and cycling routes. Delivering homes alongside a diverse range of workplaces and amenities will ensure that Old Oak's places support successful, enduring and healthy communities.

4.9 In addition to the Old Oak West SPD, OPDC has produced a set of spatial principles for the Regeneration Proposals and a regeneration strategy (the **"Regeneration Strategy"**) that was approved by the OPDC Board on 5 February 2025 following public consultation and engagement with the Local Planning Authority ("**the LPA**") and stakeholders. The Local Plan and Old Oak West SPD, the spatial principles and the Regeneration Strategy set out OPDC's aspirations and strategy for facilitating the regeneration of Old Oak. Within this planning policy context, OPDC has prepared a site-wide illustrative masterplan, which is a spatial representation of how the Regeneration Proposals could be delivered. The illustrative masterplan (the **"Illustrative Masterplan"**) will inform and form part of a masterplan framework document (the **"Masterplan Framework Document"**).¹

4.10 The purpose of the Masterplan Framework Document is to advance the guidance set out in the Old Oak West SPD ahead of the procurement of developer partner(s) in order to facilitate early engagement with the LPA and other key stakeholders including the Greater London Authority ("**GLA**") on site-wide principles, development parameters and site-wide delivery strategies, and enable the timely consenting and delivery of the comprehensive Regeneration Proposals. The Masterplan Framework Document will set out parameters and guidance for future development proposals, including development quantum, land use mix and distribution, building heights and site-wide infrastructure such as social infrastructure, connectivity, landscaping and public realm. The Masterplan Framework Document is expected to be considered for endorsement by the OPDC Board later this year.

4.11 The Illustrative Masterplan (see Figure 1) provides a spatial exemplar of how the Regeneration Proposals can be delivered through comprehensive development across two new neighbourhoods, with Channel Gate to the north and Old Oak Town Centre to the south, which together will provide around 8,000 new homes including affordable homes, approximately 150,000 to 200,000 sqm of commercial and employment space, including a three form primary school, health facilities, leisure centre and community uses. The Illustrative Masterplan addresses the strategic provision of other site-wide infrastructure including parks and open space, new routes connecting the two new neighbourhoods as well as connecting adjoining areas and communities.

¹ Drafting note: it is assumed that these documents will be in place when the statement of reasons is finalised.

Figure 1 Old Oak Illustrative Masterplan



4.12 The Illustrative Masterplan provides a clear indication of how the Regeneration Proposals could be delivered, but OPDC intends to use its powers to assemble the Order Land in advance of coming to a final decision about the detailed design and content of the redevelopment proposal for Old Oak. The Illustrative Masterplan enables the Secretary of State to have confidence that planning permission will in due course be forthcoming. Promotion of the Order will be done in tandem with the process of appointing a development partner to deliver the Regeneration Proposals. OPDC requires certainty about the availability of the relatively few 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. This approach is supported by the Guidance, in particular by paragraphs 157.1, 158.4 and 158.5 and 159.

4.13 It is expected that a joint venture vehicle between OPDC and a private sector developer will be responsible for securing planning permission for the Regeneration Proposals.

Engagement with the LPA

4.14 OPDC has undertaken formal engagement with the relevant planning authorities on the Illustrative Masterplan, including engagement with the OPDC Planning Committee, and completed stakeholder and public consultation. The LPA is supportive of the Illustrative Masterplan, the direction of travel, the principles and the site-wide strategies underpinning the proposals, noting that there has been comprehensive consideration about "how the land uses, landscape, urban form and infrastructure tie together to create a successful city district that integrates positively with the surrounding area" and that "there is the potential for the scheme as a whole to be deemed to be in compliance with the Local Plan".

4.15 OPDC has also engaged with the GLA as strategic planning authority for London. The GLA is also broadly supportive of the Illustrative Masterplan.

4.16 Further details of engagement with the LPA and the GLA are set out in section 6.

5. LAND OWNERSHIP AND LANDOWNER ENGAGEMENT

Overview

5.1 In 2023, c.9 hectares of the Order Land was in private ownership. Since 2023, OPDC has sought to acquire as many interests in the Order Land as possible by agreement and has successfully acquired c.7 hectares of land within Old Oak prior to making the Order.

5.2 OPDC is in advanced negotiations regarding a public land agreement to support the delivery of the Regeneration Proposals on the land owned by DfT/ Network Rail within the order land in accordance with the required timescales. The total percentage of the Order Land in public ownership is currently 94%.

Private landowners – land acquisition strategy and engagement

5.3 Since early 2023, OPDC has engaged extensively with landowners with interests in the Order Land and has made significant progress in acquiring those interests by agreement. The freehold land interests acquired by agreement to date by OPDC comprise:

- (a) The Ursula Lapp Industrial Estate on Old Oak Lane
- (b) The Lords Builders Merchants site on Goodhall Street (off Old Oak Lane)
- (c) The site of the Park Royal Bus Depot and adjacent land currently in use as part of a work site for HS2, on Atlas Road
- (d) A car park located on Atlas Road (to the rear of The Collective Building on Old Oak Lane)
- (e) Industrial units known as Units 2-6 and Pinnacle House at 260 Old Oak Common Lane
- (f) Land at the southern end of Midland Terrace, currently used for open storage
- (g) A former waste transfer site known as Webster's Yard (currently in use as part of a work site for HS2) on Victoria Road
- (h) Boden House at 114-120 Victoria Road, which is the current headquarters building for Boden Clothing
- (i) Units 1 and 2 at 86 Goodhall Street (close to the junction with Old Oak Lane) which comprises two industrial units
- (j) The Old Oak Café at the junction of Victoria Terrace and Old Oak Common Lane
- (k) The residential block known as Kildun Court (Units 1-10) at Old Oak Common Lane, and residential properties at 2b Victoria Terrace and 46 Midland Terrace
- (l) The site of an electricity sub-station at Old Oak Common Lane

5.4 OPDC has also provisionally agreed, subject to contract, to acquire additional land interests. These comprise:

- (a) The Power House
- (b) Unit 1 at 260 Old Oak Common Lane

5.5 Advanced negotiations are underway with regards to four further interests, namely:

- (a) 3 School Road, which has various commercial occupiers

- (b) 99 Victoria Road, which is owned and occupied by Vivalda and comprises a warehouse building
- (c) A residential property (comprising two flats) at 165 Wells House Road
- (d) The Holiday Inn Express Hotel at Victoria Road (outside North Acton station)

5.6 There are outstanding privately owned freehold land, long leasehold and property interests within the Order Land comprising:

- a. Buildings known as Tudor House, Hanover House and Saxon House at 55 Victoria Road, which comprises a datacentre
- b. Land surrounding 55 Victoria Road
- c. A waste collection and recycling facility on Atlas Road
- d. Units 3 to 5 at 86 Goodhall Street (three separate long leasehold interests) - units 1 and 2 having been acquired, as set out above
- e. Residential properties at 2-8 Victoria Terrace (eight separate freehold and long leasehold interests).
- f. Residential properties at 161, 163 and 167 Wells House Road (five separate freehold and long leasehold interests).
- g. Land forming part of the at Nash House (known as The Collective Old Oak) at Old Oak Lane.
- h. The Fisherman's Arms Public House at 50 Old Oak Lane
- i. Sections of embankment on the south side of the Grand Union Canal (Paddington Branch), crossed by the Old Oak Lane bridge and owned by the Canal & River Trust
- j. Railway embankment land known as 'Southwest Sidings'
- k. A small area of communal (visitors) car parking at the southern end of Shaftesbury Gardens

5.7 In accordance with paragraphs 17 and 156.4 of the Guidance, OPDC will continue to negotiate with the remaining owners of interests in the Order Land, including leaseholders and other occupiers, in parallel to seeking confirmation of the Order with a view to, so far as possible, bringing forward site assembly by private agreement. It will do so in accordance with its land assembly and relocation strategy which was formally approved by its Board on 5 February 2025.

5.8 Notwithstanding the extensive work undertaken to date, the Order is necessary to ensure that all of the land and rights required to facilitate the comprehensive delivery of the Regeneration Proposals are secured.

Public land/collaboration agreement(s)

5.9 Pursuant to the approval of the Outline Business Case in March 2024, OPDC, MHCLG, DfT, Network Rail and HS2 committed to enter into an agreement for the release of land to deliver the regeneration objectives. The parties are in the process of entering into a Collaboration Memorandum of Understanding ("**MoU**") which sets out how the parties have been cooperating in the coordination of a cross-government steering group in relation to the Regeneration Proposals and terms for collaboration and assurance going forward. Four principles underpin the MoU:

- (a) clarity and transparency with regard to roles, responsibilities, accountabilities and reporting lines;

- (b) collective responsibility to work collectively towards meeting the project objectives;
- (c) respecting Parties' broader roles and processes (including statutory and regulatory responsibilities); and
- (d) delivery focused and enduring with an expectation that collaboration endures throughout the project lifecycle.

5.10 OPDC is negotiating the heads of terms of a public land agreement ("**PLA**") with Network Rail Infrastructure Limited and the Secretary of State for Transport. The PLA will build upon the principles contained with the MoU and formalise the contractual arrangements for making non-operational land and interests in the Order Land owned by Network Rail Infrastructure Limited and the Secretary of State for Transport available for the Regeneration Proposals.

6. CASE FOR COMPULSORY PURCHASE

6.1 The Guidance states that a compulsory purchase order should only be made where there is a compelling case in the public interest and reasonable efforts have been made by the acquiring authority to negotiate the purchase of land by agreement. It further states that:

- (a) the acquiring authority should have a clear idea of how it intends to use the land which it is proposing to acquire and show that all the necessary resources are likely to be available to achieve that within a reasonable timescale (paragraph 13.3);
- (b) the acquiring authority should address sources of funding and the timing of that funding (paragraph 14.1); and
- (c) the acquiring authority will need to show that the implementation of the scheme is unlikely to be blocked by any physical or legal impediments and that, if planning permission is required but has not been granted, that there are no obvious reasons why it might be withheld (paragraph 15); and
- (d) the acquiring authority should be sure that the purposes for which the compulsory purchase order is made justify interfering with the human rights of those with an interest in the land affected, giving particular consideration to Article 1 of the First Protocol to the European Convention and, in the case of dwellings, Article 8 of the Convention (paragraph 12.4).

6.2 Paragraph 158.1 of the Guidance sets out a number of other factors which the Secretary of State will consider in deciding whether to confirm a compulsory purchase order made by a Mayoral development corporation:

- (a) whether the Mayoral development corporation has demonstrated that the land is needed to further those objectives;
- (b) whether the proposed use of the land by the Mayoral development corporation would be in accordance with the powers in relation to land that it has under section 206 of the 2011 Act;
- (c) what alternative proposals (if any) have been put forward by the owners of the land or other persons for regeneration;
- (d) whether regeneration is on balance more likely to be achieved if the land is acquired by the Mayoral development corporation;
- (e) the recent history and state of the land; and
- (f) any comprehensive master-planning or development proposals for the Mayoral development area.

6.3 These factors are addressed throughout this Statement of Reasons, alongside the other provisions of the Guidance which are relevant to the decision to confirm the CPO.

Compelling case in the public interest

6.4 Paragraph 12.3 of the Guidance states that a compulsory purchase order should only be made where there is a compelling case in the public interest.

6.5 OPDC has had regard to the requirements of the legislation and the Guidance and considers that there is a compelling case in the public interest to make the Order.

6.6 The following strategic objectives underpin the rationale for the promotion of the Order. These formed part of the OBC approved in early 2024 by MHCLG Investment Sub-Committee and DfT Tier 2 Board:

- (a) **Drive economic growth** - Create a nationally significant cluster of new and existing businesses that drives economic growth and invests in the local workforce;
- (b) **Build more homes** - Maximise the number of homes, affordable and market sale, ensuring all are built to a high standard of design and construction;
- (c) **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;
- (d) **Ensure value** - Maximise value for the UK taxpayer by optimising the use of public land to deliver financial, regeneration, housing and transport outcomes;
- (e) **Create a better environment** - Create a place which is resilient to the climate crisis and positively contributes to people's health, wellbeing and the environment; and
- (f) **Deliver at pace** - Ensure development is well underway by the time Old Oak Common station opens between 2029-2033.

6.7 The OBC set out/demonstrated that if no action is taken by OPDC, development around Old Oak Common Station would occur on a piecemeal basis resulting in sub-optimal and slower development than if development of the Order Land is delivered by OPDC. Similarly, without the consolidation of the existing private land interests, the development potential of the plots which are currently in public ownership cannot be comprehensively delivered. The comprehensive development of Old Oak will enable a strategic approach to delivery including site-wide infrastructure including community and leisure facilities, utilities, critical new connections and bridges, open space and public realm. Allocating uses, tenures and phasing on a portfolio basis rather than a site-by-site basis builds resilience into the Regeneration Proposals to ensure it keeps delivering, adapting to market conditions (for example focusing delivery on affordable housing in a downturn).

6.8 Promoting and securing confirmation of the Order would provide OPDC with much greater certainty of its ability to facilitate the delivery of the substantial benefits which flow from the Regeneration Proposals. Failure to promote and secure confirmation of the CPO would result in the loss of a once in a generation opportunity to bring about the significant regeneration of the Order Land.

6.9 The benefits of the Regeneration Proposals can be broadly categorised as social, economic and environmental.

Social

6.10 Among the strategic objectives for Old Oak are: **Build more homes** - Maximise the number of homes, affordable and market sale, ensuring all are built to a high standard of design and construction; and **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.

6.11 The comprehensive approach enables the delivery of truly a mixed-use neighbourhood, occupied by mixed and balanced communities. A rich mix of uses will create a place which is activated at all times, with a vibrant character to attract residents, support businesses and the local economy.

6.12 There is a need for regeneration within Old Oak. Across all measures of deprivation, Old Oak, the OPDC Area, and adjacent communities contain some of the most deprived neighbourhoods

in the country. The 2019 Index of Multiple Deprivation shows that over half of neighbourhoods within the OPDC Area fall within the top 30% of most deprived neighbourhoods nationally. High housing costs are compound deprivation in the area: Old Oak residents have substantially lower disposable incomes than the national and regional averages. Household income in Old Oak is 16% lower than London, excluding housing costs and 26% lower inclusive of housing costs. Both Old Oak and the OPDC Area are more unaffordable than London as a whole, with resident earnings not keeping pace with local house prices. Home ownership levels are low. Consequently, private and social renting levels are significantly higher than regional and national averages. As a result, access to a secure, genuinely affordable home, supplemented by stable and high-quality employment, is integral to prosperity at Old Oak. The Regeneration Proposals are expected to unlock around 8,000 new homes, including affordable housing, making a meaningful contribution to addressing London's housing and affordable housing need.

- 6.13 The approach at Old Oak will make a place to be proud of. This will involve the development of diverse and characterful neighbourhoods, central to which will be a revitalised high street connecting Harlesden to North Acton. The Old Oak development will deliver new social infrastructure and community spaces, taking a collaborative approach to work with diverse groups to design public spaces that are accessible, safe and welcoming.

Economic

- 6.14 Central to the strategic objectives are: **Drive economic growth** - Create a nationally significant cluster of new and existing businesses that drives economic growth and invests in the local workforce; and **Ensure value** - Maximise value for the UK taxpayer by optimising the use of public land to deliver financial, regeneration, housing and transport outcomes.
- 6.15 Growth is high on the national agenda and Old Oak can contribute significantly to that aim. Further, significant public investment has been made into the Elizabeth Line and HS2 and development at Old Oak ensures that the value of those schemes is captured and enhanced.
- 6.16 Unemployment in Old Oak is 7.1%, more than twice the national average of 3.5% and significantly higher than the 4.8% average in London. Alongside unemployment, there are skills deficiencies in Old Oak. The area has a high proportion of low-skilled workers, and a low proportion of residents with skills at degree level and above. Skills deprivation also strongly affects the neighbouring London Boroughs of Ealing and Brent despite the area being a major local economic hub. Intervention needs to capitalise on the assets of neighbouring Park Royal and White City. Approximately 150,000 – 200,000 square metres of new commercial and employment space is proposed, which will provide significant employment opportunities for local residents. As set out in the Regeneration Strategy, OPDC will ensure that a proportion of jobs are specifically for local residents and is proposing training initiatives.

Environmental

- 6.17 The strategic objectives include the need to **Create a better environment** - Create a place which is resilient to the climate crisis and positively contributes to people's health, wellbeing and the environment.
- 6.18 Today, Old Oak is under-populated, polluted, noisy and fragmented, and lacking in green and amenity space. The area benefits from proximity to Wormwood Scrubs (the largest open space in North-West London) and the Grand Union Canal. However, these assets are largely inaccessible from the Old Oak area and can be perceived as unsafe. Neighbouring communities including Park Royal, North Acton, Harlesden and Willesden Junction, and Scrubs Lane are isolated from one another. Old Oak, which connects all these locations, does not have a town centre or focal point. There are few residential properties and the ability for local culture and economy to take root is severely hindered by the temporary disruption from HS2 construction, combined with a level of uncertainty about how the surplus land will be utilised in the future, and the physical isolation of the communities from one another. As part of the Regeneration Proposals, it is intended that this brownfield land will be redeveloped to deliver a new urban

quarter that aims to be sustainable and zero carbon in use. In particular, the Regeneration Proposals would protect and enhance the existing environment and biodiversity in Wormwood Scrubs and along the canal and deliver new public parks and series of pedestrian, cycle routes and Healthy Streets to improve air quality, reduce congestion, improve pedestrian safety and encourage public transport usage, capitalising on the excellent connections the new station will provide.

Challenges absent CPO

6.19 There are three specific spatial conditions that would impede comprehensive regeneration of the Order Land absent OPDC intervention. Confirmation of the Order would enable OPDC to facilitate the comprehensive delivery of the Regeneration Proposals. These factors add to the expediency for making the Order:

- (a) **Severance:** Local and internal connectivity remains fundamental to ensuring national investments in HS2 and the Elizabeth Line translate into new homes and jobs. Movement around the site and the new station needs to be efficient, safe and pleasant and the station needs an approach which is befitting of its national significance. Currently, severances caused by the London Overground rail infrastructure and the Grand Union Canal mean that the new Old Oak Common station and HS2 and the Elizabeth Line are disconnected from surrounding areas. Local communities in places like North Acton and Midland Terrace will not be able to easily access the station, meaning that the local benefits of the major national rail investments will be limited without fully integrating into the local surroundings.
- (b) **Fragmented land ownership:** At present, fragmented land ownership impedes the comprehensive development and regeneration of Old Oak. Other than the land in public ownership, and despite the fact that OPDC has acquired a significant proportion of the privately owned land, there remain a number of land interests within Old Oak which need to be acquired in order for coherent and comprehensive development to be carried out. No single landowner [or consortia of landowners] currently has the incentive or resources to comprehensively masterplan a cohesive place, deliver site-wide infrastructure, or maximise development capacity across the whole area. This is compounded by the fact that many operational sites in Old Oak West are subject to leases that benefit from security of tenure.
- (c) **Existing functional land uses:** Old Oak has historically been used for industrial or rail related purposes, the legacy of which plays out in the prevalence of 'functional' land uses. These land uses include London Plan waste allocations, telecoms infrastructure, rail related and freight sites, and sites associated with the operation of franchise bus services. These uses are generally low-intensity meaning that the land is underutilised and the costs associated with bringing such sites into a developable condition and delivering the necessary infrastructure are unlikely to be able to be met by single landowners [or consortia of landowners]. Whilst these existing uses are important, the opening of Old Oak Common station means that Old Oak has the opportunity to support more intensive commercial and residential uses which will be better suited to the location of the station.

6.20 There are also coordination challenges. A significant level of coordination is required to facilitate the relocation of functional land uses, deliver enabling infrastructure and maximise the development capacities on plots. The required coordination will not happen without public intervention because there are significant, complex and long-lasting barriers which prevent individual parties from working together, notably ingrained operational uses of land which require de-designation and appropriate sites for relocation. Public sector co-ordination of land assembly, infrastructure delivery, funding and regeneration powers, resourcing and expertise is imperative to deliver the strategic objectives of regeneration. Comprehensive planning of the area allows uses, infrastructure and public realm to be organised in a way which transforms the entire area and has maximum placemaking impact.

- 6.21 The scale and scope of infrastructure investment required to unlock and enable Old Oak is significant and will not be delivered by piecemeal developments by the market or existing landowners alone. This is particularly so given the high level of public infrastructure such as station upgrades, roads, bridges and walkways that are critical to placemaking. Provision of such infrastructure will not be delivered by the private sector and planning contributions are not sufficient to fund them at the outset or in full. This infrastructure is critical to transforming Old Oak, creating a cohesive place and maximising the social and economic outcomes of the project.
- 6.22 Unconstrained by land ownership boundaries, the Illustrative Masterplan has been able to take a strategic and site-wide approach address to some of these challenges. For example, the Illustrative Masterplan proposes a number of strategic routes and connections to address the severance challenges including a new east-west bridge to provide a direct route to the new Old Oak Station and North Acton allowing development capacity of the proposed Old Oak Town Centre, as well as new open space and green corridors. Social infrastructure, including a new three form primary school, health facilities and a leisure centre, has also been considered on a site-wide basis, not only to meet the needs of the development but also to ensure these are located to maximise development capacity and regeneration benefits for both existing and new communities.
- 6.23 Without the making of the Order and comprehensive redevelopment by OPDC in collaboration with a development partner, OPDC considers that some minimal development would still come forward but on a piecemeal basis which would not adequately address the challenges of severance or delivering site-wide infrastructure in the same way. It would also result in a failure to maximise the development potential of the Order Land. While it is possible, subject to funding, that some key site-wide infrastructure may come forward in line with Local Plan requirements, and that this would improve the connectivity of Old Oak, development across the area as a whole would be neither coordinated nor optimised. The quantum of housing would be considerably lower and the sites would be likely to deliver materially less affordable housing

Justification for interference with human rights

- 6.24 OPDC has had regard to the impact of the Order on the human rights of those with interests in the Order Land and is satisfied that the purposes for which the Order is made, as detailed in section 4, justify interfering with those human rights. Human rights are discussed in further detail in section 8.
- 6.25 Whilst the Guidance states that acquiring authorities should seek to acquire land by agreement wherever practicable, it acknowledges that it may often be sensible, given the amount of time required to complete the compulsory purchase process, for an acquiring authority to initial formal procedures for compulsory purchase (paragraph 2.8. of the Guidance). In relation to Mayoral development corporations, paragraph 156.4 of the Guidance states, *"While a Mayoral development corporation should acquire land by agreement wherever possible, it is recognised this may not always be practicable, for example, in terms of timings for the delivery of a scheme. It may sometimes be necessary for a Mayoral development corporation to use its compulsory purchase power to make a compulsory purchase order at the same time as attempting to purchase an interest in land by agreement."*
- 6.26 Despite OPDC's extensive engagement with landowners, it has not proved practicable to secure voluntary agreements with every relevant landowner to enable the strategic objectives in the OBC to be achieved. Further information is set out in the below paragraphs.
- 6.27 As stated in section 5 above, OPDC has engaged extensively with landowners with interests in the Order Land for over two years. It has acquired or contracted to acquire 78% per cent of the privately owned land within the Order Land by area. It has also engaged with the landowners of all outstanding interests and will continue to do so in accordance with its Land Assembly and Relocation Strategy, alongside seeking confirmation of the Order.

Availability of all necessary resources, funding and timing

Funding

- 6.28 As part of the development of the Outline Business Case, technical study work was undertaken to establish the estimated financial metrics and requirements of the scheme. This has included financial modelling for the project which includes the estimated project and enablement costs required to support comprehensive regeneration. Further baseline study work has been undertaken on the Illustrative Masterplan which now underpins the assumptions and costs in the modelling with development quantum, costs and values provided by independent consultants.
- 6.29 OPDC has sufficient access to funds from central and local government to cover the costs of land assembly.
- 6.30 The modelling assumes that OPDC, its development partner(s) or both will secure funding for enablement costs, such as infrastructure costs, and that individual plot developers will secure senior debt financing to deliver the developments forming part of the Regeneration Proposals, which is assumed to be secured at a comparable rate to current market rates. The modelling also assumes that receipts from public sector land sales and particularly those to OPDC are recycled back into the scheme or deferred land payments scheduled to stimulate and maximise private investment for minimal additional public intervention. This will be enabled by the PLA. This adopts a patient capital approach to both payment for public sector land and repayment of public debt.
- 6.31 In recognition of the importance of Old Oak in delivering local, regional and national objectives and unlocking the full benefits of the HS2 and Elizabeth Line investments, the Mayor of London and MHCLG have committed a combined total of £304m of capital investment. This investment has provided critical funding to support assembly of the land required to create a comprehensive regeneration platform.
- 6.32 The financial case completed within the OBC confirmed that the range of potential financing requirement is realistic based on recent lending precedents and other major London masterplans. Depending on the availability of private finance sources at the time of requirement, it may be that the development partner has other more innovative and cost-effective means of financing the project.

Delivery

- 6.33 It is intended that the Regeneration Proposals for Old Oak will be delivered through a phased approach, reflecting the land availability, as well as physical and commercial constraints. An indicative phasing sequence has been developed to inform financial modelling. Phasing will be refined and updated as further detail becomes available on land release, commercial specifics and the preferred delivery strategy once the development partner is appointed. The phasing currently represents a credible scenario based on the Illustrative Masterplan and sees development being delivered over a period of 15 to 20 years.
- 6.34 OPDC expects to enter into a contract with a development partner to deliver the Regeneration Proposals. A number of commercial structures have been explored and tested with the market. The commercial structure will likely be/is planned to be a joint venture between OPDC and its development partner. The joint venture will be tasked with a number of enabling roles, which are expected to include maintaining a business plan for the project; masterplanning; obtaining planning permission; coordinating the delivery of development plots with wider infrastructure works and funding; and coordinating the delivery of residential, commercial and social infrastructure uses. The development partner will be responsible for enabling works but will deliver individual plots, with a commitment to the delivery of the first phase and right of first refusal for future phases.

- 6.35 Procurement for the development partner [is anticipated to commence during the latter part of 2025 or early part of 2026]. A draft procurement strategy has been prepared which proposes a 9-12 month programme with a preferred bidder selected by Q3 2026.
- 6.36 An initial round of early market engagement ("**EME**") with potential development partners was conducted in November 2024 and February 2025. This confirmed a strong interest in taking forward residential-led, mixed-use development at Old Oak, working in partnership with OPDC. Participants were excited by the fundamentals of Old Oak, recognising its potential for transformative change. The opportunity to deliver thousands of new homes within a mixed-use district boasting exceptional transport links was widely acknowledged as unique and compelling. The prospect of working in partnership with a Mayoral development corporation was recognised as very attractive. A further round of EME, focused on obtaining feedback on the JV commercial structure and updating on OPDC's progress, was undertaken in May 2025 with 12 organisations who had expressed an interest in the whole of Old Oak rather than specific phases.

Timing

- 6.37 One of the strategic objectives identified for Old Oak by OPDC, the Department for Transport, HS2, Network Rail, the Ministry of Housing, Communities and Local Government and Homes England, is to ensure development is well underway by the time Old Oak Common station opens.
- 6.38 OPDC has already acquired the majority of the privately owned Order Land. It will take steps to ensure that the land acquired remains in active use, either through the extension of leases and licences or through supporting "meanwhile" uses.
- 6.39 The Order Land will be brought into beneficial use within a reasonable timeframe, should the Order be confirmed. OPDC has taken steps towards appointing a development partner(s), obtaining necessary funding, acquiring a significant portion of the privately owned land required for the Regeneration Proposals, and progressing an Illustrative Masterplan which has been endorsed by OPDC which demonstrates that the Regeneration Proposals are in general compliance with the Planning Framework for the area. As such there is, in principle no reason why planning permission is likely to be withheld for the Regeneration Proposals.
- 6.40 Notwithstanding the recently announced delay in the completion of HS2, OPDC expects that development of the Order Land is likely to commence in 2029. The first sites are expected to be capable of being in beneficial occupation in 2031. Although development will be ongoing until approximately 2045, OPDC considers that it is necessary and justified for the Order to be made in respect of the entirety of the Order Land at this stage because:
- (a) the Order is essential to enable to comprehensive delivery of the Regeneration Proposals. Without assembly of all of the Order Land, OPDC's ability to achieve their regeneration objectives would be significantly impeded. OPDC and any proposed development partner's need to have certainty at the outset for developer and investor confidence that all of the land will be available for the carrying out of the redevelopment at the relevant time;
 - (b) major infrastructure works need to be carried out at the outset which affect the entirety of the Order Land. OPDC's design team have considered whether the delivery could be staggered so that parcels of land could be acquired later, however this is not feasible because enabling works are required to facilitate the wider development. These include: (i) installation of new services and upgrading existing services; (ii) works to existing highways including widening the highways into some parcels of the Order Land; (iii) construction of new bridges which require some parcels of the Order Land; and (iv) demolition, remediation, site inspection, surveys and temporary works to prepare parcels for future development and/or to carry out works on adjoining land.

- (c) it is essential that the compulsory purchase process is run in tandem with the developer procurement process and refinement of design proposals ahead of submission of a planning application to ensure that development can commence in accordance with the above timescales to ensure that proposals come forward to coincide with and maximise the development opportunities afforded by the opening of the new Old Oak Common station and freeing up of the public land. 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; and
- (d) development of the scale envisaged in the Regeneration Proposals are required in order for the redevelopment to be financially viable. In addition, economies of scale can be achieved at this scale, which can reduce environmental impacts. There is also scope to build innovative supply chains and plan for long-term sustainable energy, water and waste strategies. Private sector investment must be harnessed early to de-risk the project for the public sector by using private sector skills, expertise, resource and capital, which is the most cost effective way to deliver comprehensive development. Establishing a critical mass of development and a sense of place early on is important to building appetite and momentum, supporting better values and occupier interest.

Planning status

Planning policy framework

- 6.41 Under section 38(6) of the Planning and Compulsory Purchase Act 2004, the LPA is required to determine planning applications in accordance with the development plan, unless material considerations indicate otherwise.
- 6.42 The development plan for the OPDC Area comprises the Local Plan 2022, London Plan 2021, Harlesden Neighbourhood Plan 2018, and the West London Waste Plan 2015.
- 6.43 Within these development plan documents, there are planning policies which support transformative regeneration and the scale of the ambition of the Regeneration Proposals. There are also policies which reflect constraints at the site and require the Regeneration Proposals to be justified.
- 6.44 In addition to the development plan documents, there are a number of documents which do not form part of the development plan but which would constitute material considerations for the determination of any planning application for development within Old Oak, including the Regeneration Proposals.
- 6.45 The key strategic policies and material considerations are summarised as follows:

London Plan 2021

- 6.46 The London Plan seeks "Good Growth". This is reflected in Policy GG2 which favours the development of brownfield land, particularly in Opportunity Areas, and encourages those involved in planning and development to proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport. This policy also supports the application of a design-led approach to optimise the development capacity of sites.
- 6.47 There is an emphasis on the delivery of homes within the "Good Growth" policies within the London Plan; notably Policy GG4 which aspires to create a housing market that works better for all Londoners and so encourages those involved in planning and development to ensure that that more homes are delivered.

- 6.48 Policy SD1 establishes the capacity for significant growth within the Old Oak and Park Royal Opportunity Area, at 25,000 homes and 65,000 jobs. The supporting text to the policy at paras. 2.1.59 and 2.1.60 references the huge regeneration potential of the area by way of the creation of a new town centre with a distinctive character. The supporting text also references the role of the Old Oak Common station (connecting HS2, the Elizabeth line and National Rail) and the potential to bring forward regeneration in advance of the delivery of the Old Oak Common station, around the existing and potential new rail stations in the area.
- 6.49 Policy T3 contains a list of strategic transport schemes at Table 10.1 and directs Local Planning Authorities to safeguard the schemes. Table 10.1 includes the London Overground extension known as the West London Orbital. Development proposals are required to provide adequate protection for and/or suitable mitigation to allow the relevant schemes outlined in Table 10.1 to come forward. Those that do not, or which otherwise seek to remove vital transport functions or prevent necessary expansion of these, without suitable alternative provision being made to the satisfaction of transport authorities and service providers, will not be considered favourably.
- 6.50 Where a scheme in Table 10.1 could potentially be affected by a proposal, applicants are required to consult with TfL (and other relevant authorities) at an early stage to understand the latest status of the scheme and identify impacts and whether any suitable mitigation is possible.
- 6.51 The underlying intention of Policy T3 is to ensure that there is provision of sufficient and suitable land for the current and expanded public and active transport system. This includes the specific sites in Table 10.1 but also other "vital transport functions".
- 6.52 This policy is relevant to the Regeneration Proposals as the site for the West London Orbital is within the boundary of the Regeneration Proposals. There are also various parcels of land within the boundary that currently perform a transport function. There are ongoing workstreams meaning that OPDC is satisfied that this planning policy constraint to the Regeneration Proposals can be overcome.

Local Plan 2022

- 6.53 The Local Plan sets out OPDC's spatial vision and a series of policies to shape the regeneration of the Old Oak and Park Royal area between 2018 and 2038.
- 6.54 Policy SP1 sets down the desired transformation at Old Oak over the plan period. The overall ambition is the creation of a new part of London that acts as a catalyst for growth at national, regional and local levels.
- 6.55 "Place" policies P1 to P12 provide spatial guidance for 12 "places" within the OPDC Area. Each place is different with regard to its existing character and future opportunities and challenges. Therefore these policies provide specific guidance for each place at a greater level of detail than the Strategic Policies and the Development Management Policies in other parts of Local Plan.
- 6.56 Within the "places", a series of "clusters" are identified. Clusters are characterised as locations that are likely to attract higher footfall and/or have a particular use that warrants more detailed policy. For each "place" and "cluster", a vision, policy, and diagram is provided.
- 6.57 "Place" and "cluster" policies are accompanied by a series of Site Allocations that are likely to come forward for development and contribute to OPDC's homes and jobs targets. These set specific job capacity targets and minimum homes targets for these sites.
- 6.58 Policy SP10 reinforces the need to facilitate a comprehensive and integrated approach to the delivery of development and infrastructure and for the optimised delivery of the Site Allocations within the Local Plan.
- 6.59 Policy DI1 highlights that OPDC will balance the priorities for affordable housing, infrastructure delivery, and other non-infrastructure related planning obligations and sustainability standards

with site specific constraints and the needs for deliverability and securing the timely regeneration of the area.

- 6.60 Policy D14 policy specifically notes the potential use of compulsory purchase powers to facilitate land assembly and the acquisition of all necessary rights to carry out development, where there is a compelling case in the public interest.
- 6.61 Policy EU6 is relevant to the safeguarded waste sites within the boundary of the Regeneration Proposals. This requires any existing waste management sites lost to a non-waste use to provide equivalent or enhanced compensatory site provision which normally meets the maximum throughput that the lost site could achieve. Compensatory site provision should be made in the most appropriate location, following the sequential approach in Policy EU6. OPDC is confident that the Regeneration Proposals will be delivered in a manner which satisfies the requirements of the Policy EU6.
- 6.62 Policy P9 also refers specifically to the Willesden Freight Terminal and to supporting the retention or potential relocation/ reincorporation of this facility to the Channel Gate proposals. Supporting text to this policy outlines that the Willesden Freight Terminal provides a valuable opportunity to increase levels of sustainable rail freight transport with access to regional and national networks. Development proposals are required to allow for its continuing operation and development adjacent to it should support its functioning as a terminal in terms of its design, land use and access.
- 6.63 OPDC is cognisant of these planning policies requirements and will ensure they are addressed to the satisfaction of the LPA.
- 6.64 Policy D7 speaks to the treatment of development proposals affecting non-designated heritage assets (i.e. Locally Listed buildings). It outlines that development proposals should reflect in their design a positive response to non-designated heritage assets; and avoid an unjustified adverse effect on the significance of non-designated heritage assets. Policy D7 requires the sequential approach set out in Table 5.3 to be undertaken to manage the impact of development proposals on the asset's significance. The sequential approach essentially favours preservation of the heritage asset, and disfavors proposals seeking to demolish part or all of a non-designated heritage asset. In circumstances where demolition is proposed, a clear justification is required.
- 6.65 Policy H5 resists the loss of existing residential accommodation, unless the proposed redevelopment would result in new housing being provided at an equivalent or higher density, measured by unit numbers and floorspace; or its loss is critical to unlock the comprehensive regeneration of the area.
- 6.66 These policies are relevant to the proposed redevelopment of Victoria Terrace within the Regeneration Proposals. Both Policies H5 and D7 allow for a justification to be put forward for the loss of Victoria Terrace, which is an active workstream by OPDC. Alike the other constraints described above, OPDC expects that this policy issue can be satisfied through consultation with the Local Planning Authority, and/or will be outweighed by the strong policy support for the proposal in other areas of the development plan and other material considerations.

West London Waste Plan

- 6.67 The West London Waste Plan identifies existing waste sites which have been allocated as having the potential for waste capacity expansion by redevelopment (Table 5-1) and sites with potential for development for waste management facilities (Table 5-2) which are safeguarded. The Victoria Road waste site features in Table 5-1 and Table 5-2, and the Atlas Wharf and Willesden Freight Terminal waste sites both feature in Table 5-2, meaning they are protected. These three sites are within the boundary of the Regeneration Proposals. There are ongoing workstreams meaning that OPDC is satisfied. OPDC is confident that the Regeneration Proposals

will be delivered in a manner which satisfies the requirements of the West London Waste Plan.*Old Oak and Park Royal Opportunity Area Planning Framework 2015*

- 6.68 This Opportunity Area Planning Framework does not set planning policy, but provides additional guidance further to those policies already adopted in the London Plan. This additional guidance covers a number of areas, including: guidance on desired land uses, infrastructure requirements and urban design measures; ways to maximise the considerable investment presented by the delivery of the HS2/Elizabeth line interchange; and how the Old Oak Common HS2 station and surrounding development could be properly integrated with surrounding neighbourhoods, communities and town centres.

Old Oak West SPD 2024

- 6.69 Old Oak West is subject to 6 different "place" policies within the Local Plan. The SPD was thus devised to amalgamate the relevant "place" policies in the Local Plan to provide clearer spatial planning guidance for Old Oak West and to support a comprehensive and coordinated approach to development. The SPD contains various guiding "principles" across a full range of development management topics, along with various spatial concept diagrams, which are all relevant to the Regeneration Proposals at Old Oak.

- 6.70 Appended to the SPD is an "illustrative masterplan". This provides an indication of one way in which the Old Oak West area could be developed as shaped by the guidance in the SPD.

*National Planning Policy Framework ("**NPPF**")*

- 6.71 The strategic support for the Regeneration Proposals that exists within the development plan is also prevalent within the NPPF.

- 6.72 The new NPPF was published on 12 December 2024. It took immediate effect. The NPPF is also a material consideration. It contains the national planning policies that will be applied by the LPA where relevant. It has an emphasis on development of brownfield land but in a comprehensive manner, as well as the delivery of housing.

- 6.73 Paragraph 61 of the NPPF focusses on the significance of boosting the supply of homes and notes that the overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community.

- 6.74 Under paragraph 125(c) of the NPPF, substantial weight is to be given to development of brownfield land unless there is substantial harm.

- 6.75 Paragraph 126 of the NPPF encourages local planning authorities to take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available. It expressly refers to identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward to meet development needs and/or secure better development outcomes.

Engagement with LPA

- 6.76 A focused period of pre-application engagement on the Illustrative Masterplan has taken place with the LPA between November 2024 and [May] 2025. [Five] meetings [have taken place] covering the following topics:

- (a) Meeting 1: Introduction and overview of spatial principles
- (b) Meeting 2: Connected Place Vision including landscape and movement
- (c) Meeting 3: Canalside Neighbourhood

(d) Meeting 4: Old Oak Town Centre

(e) Meeting 5: Overall feedback session and initial heritage discussions.

6.78 The key material from the pre-application meetings will be translated into a Masterplan Framework document and considered for endorsement by the OPDC Board in September 2025.

6.79 The LPA is supportive of the proposals, and has concluded that the Illustrative Masterplan is "capable of being in accordance with the Local Plan" as evidenced in the pre-application feedback; Committee Report; and Board Paper, although future planning application(s) will be determined on its merits in the usual manner.

6.80 OPDC has also engaged with Greater London Authority planning officers, as the Mayor of London is the strategic planning authority for London. The GLA is also broadly supportive of the Illustrative Masterplan and a written response to the pre-application engagement is expected shortly.

Overall planning position

6.81 Overall, there is very strong planning policy support within the development plan and NPPF establishing a strong presumption in support of the Regeneration Proposals.

6.82 Based on the detailed work to date on planning matters, and the expected resolution of identified policy issues and adoption of the Masterplan Framework Document, OPDC is satisfied that there are no obvious reasons why planning permission would be withheld for an application or applications for development broadly consistent with the Illustrative Masterplan. Having regard to Section 38 (6) of the 2004 Act, the OPDC is satisfied that such an application would be likely to accord with the development plan, when read as a whole, and would be supported by a number of additional material considerations including the NPPF, the SPD and Illustrative Masterplan, which would indicate that planning permission ought to be granted for the proposed development.

Potential physical or legal impediments

6.83 Paragraph 15 of the Guidance notes, *"it is not expected that all impediments to the delivery of a scheme will have been removed or overcome by the point at which the decision on the confirmation of a compulsory purchase order is made. It may be necessary to assemble land before removing or overcoming certain impediments to maximise the opportunities that exist for an area."* However, the acquiring authority must demonstrate that that the scheme underlying the order is unlikely to be blocked by impediments to implementation. These points are reiterated in paragraph 159.3.

6.84 Paragraph 159.4(c) of the Guidance states that, where impediments are yet to be resolved or overcome, the acquiring authority must 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.

6.85 Paragraphs 6.377 to 6.40 set out the importance of the CPO being made and confirmed at this stage and how the use of OPDC's compulsory purchase powers would help promote the achievement of its objectives.

6.86 Without compulsory purchase, the delivery of Old Oak from an infrastructure perspective poses significant obstacles. Sites comprise a mixture of railway and industrial land, either historically or at present day, and this presents challenges such as land contamination and the relocation of uses that are not easily accommodated in urban areas. The waste facilities at Atlas Wharf is a case in point. Cross-cutting railway lines and the Grand Union Canal present additional

challenges for the delivery of a network of below ground infrastructure, as well as for public realm aspirations and surface connectivity. Additionally, there are complexities in having to relocate Network Rail infrastructure from existing sites, and accommodating safeguarding for the delivery and maintenance of new HS2 infrastructure.

6.87 Nevertheless, if a comprehensive site is assembled by means of the Order, then with careful planning, adequate lead in times, and appropriate budgeting, OPDC is confident that all barriers to development can be overcome. OPDC is already working with stakeholders on lease break dates and relocation strategies to achieve vacant possession of the land and how an appropriate pipes and cables network can be delivered across the extent of Old Oak. OPDC engages with HS2 regularly on the Regeneration Proposals and is actively working with Network Rail. [As set out above, HS2 and Network Rail are parties to Collaboration Memorandum of Understanding under which the parties have committed to collaborating in relation to the Regeneration Proposals.

6.88 Potential constraints affecting the Regeneration Proposals are set out below, together with proposed mitigation and solutions:

- (a) Local highway authority agreements and consents will be required for highways work, to be delivered either by OPDC's development partner under section 278 of the Highways Act 1980 or by the respective local highway authorities. A stopping up order will be required for an extent of both Bethune Road and St Leonards Road in the London Borough of Ealing. Some parking bays are currently expected to be proposed for removal on adopted highways, again in Ealing. Such agreements and consents are typical in the course of development and there is no reason why all relevant agreements/consents will not be obtained.
- (b) Construction works associated with the Regeneration Proposals will require temporary road closures and/or parking restrictions. OPDC is part of an HS2-led group that co-ordinates highways works to reduce local impact, and once again these are typical in the course of development and there is no reason to believe it will not secure the necessary consents.
- (c) Above-ground relocations are required in order to bring forward the Regeneration Proposals as planned. These include: (i) a waste collection and recycling facility at Atlas Road; (ii) operational rail assets; (iii) electrical sub-stations and/or associated infrastructure (iv) telecoms infrastructure; and (v) an electric cable oil shack on the Acton Wells East site. For all relocations required OPDC has already commenced engagement with the necessary stakeholders, established technical requirements and is making good progress with options for relocation.
- (d) There is below-ground infrastructure in the Old Oak area, and OPDC anticipates some utilities diversions and utilities upgrades will be required. Where possible, OPDC will seek to avoid diversions, but it is working with utilities providers to establish the extent of diversion and upgrade requirements, where this will be unavoidable. Cost allowances are in place for this.
- (e) Under OPDC's Local Plan, any development proposals must safeguard for the delivery of both the potential West London Orbital and Mildmay line extensions, with a station at Old Oak Common Lane. OPDC has worked with Transport for London to ensure that its development plans do not preclude development of this infrastructure and in particular that the East-West bridge allows for integration with the proposed stations. If this safeguarded land is not required for transport purposes, it will provide additional development capacity for OPDC including the delivery of further homes

6.89 In conclusion, whilst further steps are required in order to overcome all potential impediments to the delivery of the Regeneration Proposals, none of these constraints comprise anything out of the ordinary for a development of the scale envisaged. OPDC is confident that each is capable

of being overcome as described above, such that they will not prevent the delivery of the Regeneration Proposals within a timely manner and that it is appropriate for the Order to be confirmed, notwithstanding that work is still ongoing to resolve these impediments.

Consideration of alternatives

- 6.90 The OBC completed in 2023 considered in detail a series of alternative options relating to the scale and form of development that could come forward at Old Oak, commencing with a long list of scheme options including a 'do nothing' scenario. These were contemplated against the strategic objectives in the OBC and economic analysis.
- 6.91 On the basis that progressing a compulsory purchase order should be a last resort, OPDC has considered whether it could delay acting, or "do nothing" to enable individual landowners to bring sites forward for development once the Old Oak Common station is opened, however if no action is taken, development around the station will occur on a piece-meal basis, resulting in sub-optimal and slower development and a reduction in regeneration outcomes. In this scenario, fewer homes would be delivered, later with a less certain delivery plan for enabling infrastructure, or wider regeneration outcomes.
- 6.92 OPDC has also considered the options for developing other land outside of the OBC options analysis and within the OPDC Area however Old Oak North and Park Royal Industrial Estate both have Strategic Industrial Land allocations in OPDC's Local Plan and are therefore not currently deemed suitable for residential development in accordance with the development plan.
- 6.93 Comprehensive regeneration, as evidenced in the OBC, will deliver better value for money than the "do nothing" or alternative scenarios. This is to be expected given the greater scale of coordinated development unlocked by comprehensive regeneration, with almost four times greater benefits. This is driven by greater levels of housing development, regeneration impacts for existing residents/businesses, and larger quantum of affordable housing. Comprehensive regeneration at Old Oak also enables a strategic approach towards sustainable future-enabling active travel, and unlocking opportunities for site-wide initiatives such the development of the OPEN (Old Oak and Park Royal Energy Network), which will provide heat for existing users and future development in Old Oak.
- 6.94 OPDC's extensive research has identified that the development of Old Oak is most effective way of meeting OPDC's regeneration objectives whilst minimising interference with privately held land interests.

Conclusion

- 6.95 For the reasons given above, OPDC does not consider that there are suitable alternatives to the Order which would deliver the objectives of the Regeneration Proposals, and further considers that the purpose for which the Order Land is to be acquired justifies acquiring the interests in the Order Land. Compulsory acquisition has been proposed as a last resort and is necessary.
- 6.96 The Order will facilitate acquisition of the Order Land which, in turn, will pave the way for the delivery of the Regeneration Proposals.
- 6.97 There is therefore a compelling case in the public interest for the acquisition of the interests in the Order Land. For the reasons given above, piecemeal development within the Order Land would not achieve OPDC's statutory or Strategic Objectives.
- 6.98 OPDC has considered carefully whether each parcel of land within the Order Land is required in order to secure OPDC's objectives and is satisfied that all interests are required and that the acquisition of each is justified.

7. SPECIAL CONSIDERATIONS INCLUDING SPECIAL CATEGORY LAND AND RELATED ORDERS

Planning designations

7.1 The Old Oak Lane area and the Grand Union Canal are designated as conservation areas. Willesden Junction Station, the Old Oak Lane area, Willesden Junction Maintenance Depot, Victoria Terrace, Midland Terrace and Wells House Road are designated as local heritage assets. Of these, Willesden Junction Maintenance Depot, Victoria Terrace, one property on Midland Terrace and four properties on Wells House Road sit within the Order Land.

7.2 There are no statutorily listed buildings within the Order Land.

Special category land

7.3 The Order Land includes land in which the Crown has an interest. OPDC is not authorised (and is not seeking authorisation) to acquire Crown interests pursuant to the Order and has engaged with the Department for Transport with a view to acquiring any interests needed for the Regeneration Proposals by agreement.

7.4 The Order Land includes some operational land of statutory undertakers. All statutory undertakers have been identified and discussions are progressing and will progress with them. Within the Order Land there are several electricity substations and leasehold interests that include telecommunication apparatus and masts operated by telecommunications companies. In addition, there are various statutory undertakers who operate apparatus within the Order Land and discussions regarding the diversion of this apparatus are ongoing.

7.5 The Order Land includes land previously known as the Birchwood Nature Reserve (part of plot 190), which is open space, albeit that the public do not currently have access. OPDC intends to acquire the open space in order to secure its preservation and to improve its management, enabling it to be reopened to the public as part of the Regeneration Proposals. A certificate under section 19(1)(aa) of the 1981 Act will be sought from the Secretary of State.

Related Orders

7.6 A stopping up order will be required for two sections of public adopted highway within the London Borough of Ealing: i) St Leonard's Road, between the junction with School Road and with Bethune Road, and ii) Bethune Road between the junction with St Leonard's Road and Chase Road. Both of these roads are currently temporarily closed by HS2 Ltd.

7.7 There is no intention of applying for the stopping orders in tandem with the promotion of the CPO as they are not required as part of the delivery of the early phases of the Regeneration Proposals. OPDC is however satisfied that the necessary stopping up orders will be obtained, when required.

8. HUMAN RIGHTS CONSIDERATIONS

- 8.1 The Human Rights Act 1998 incorporated into domestic law the European Convention on Human Rights ("**ECHR**"). The ECHR includes provisions in the form of Articles which aim to protect the rights of the individual.
- 8.2 Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way which is incompatible with the ECHR.
- 8.3 As is clear from paragraph 2 of the Guidance, a compulsory purchase order should only be made where there is a "compelling case in the public interest", and that a public authority pursuing a compulsory purchase order should be sure that the purposes for which it is making that order sufficiently justify interfering with the human rights of those with an interest in the land affected. In making this assessment, the authority should have regard, in particular, to the provision of Article 1 of the First Protocol and Articles 6 and 8 to the ECHR.
- 8.4 Article 1 of the First Protocol of the ECHR states that "every natural or legal person is entitled to peaceful enjoyment of his possessions" and that "no one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by the law and by the general principles of international law....".
- 8.5 Whilst the owners of the land comprised in the Order Land may be deprived of their property if the Order is confirmed and thereafter implemented, this will be done in accordance with the law. The public benefits associated with the Order are set out in this statement, and OPDC considers that the Order strikes a fair balance between the public interest in seeing the regeneration proceed (which is unlikely to happen in the absence of the Order), and the private rights which will be affected by the Order.
- 8.6 In this case, despite efforts being made, OPDC has not been able to secure agreements with the owners of the Order Land [nor has it been possible to locate the owners of the land in "unknown" ownership] [**subject to conclusion of land referencing**]. Such parties will be entitled to compensation calculated under the compulsory purchase compensation code in respect of land acquired by OPDC pursuant to the Order.
- 8.7 Article 6 of the ECHR provides that: "in determining his civil rights and obligationseveryone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law". The Article 6 rights are met by the procedures for objection and confirmation, the right to bring a legal challenge in the High Court under the Acquisition of Land Act 1981 and the right to have any claim for compensation determined by the Upper Tribunal.
- 8.8 The regeneration of the Order Land has been comprehensively consulted upon. There has been an opportunity to make representations regarding the planning policies that promote development of the Order Land and there has been further consultation in relation to the Old Oak West SPD. OPDC has further entered into extensive discussions and negotiations with the affected landowners regarding the future of the area and the Regeneration Proposals.
- 8.9 Where parties object to the Order, the Secretary of State for Housing, Communities and Local Government will arrange either for written representations or for a public local inquiry to be held to provide those parties with an opportunity to be heard. Should the Order be confirmed, a person aggrieved may challenge the order in the High Court if they consider that there are sufficient grounds for doing so. In relation to compensation disputes, affected persons have the right to apply to the Upper Tribunal, an independent judicial body. This process is compliant with Article 6.
- 8.10 Article 8 of the ECHR provides that: "everyone has the right to respect for his private and family life, his home and his correspondence" and that "there shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of....the economic wellbeing of the country...".

- 8.11 Whilst there may be some interference with the rights of the owners of the land comprised in the Order, this will be done in accordance with the law. OPDC considers that the benefits associated with the Regeneration Proposals as set out in this report, strike a fair balance between the public interest in seeing the Regeneration Proposals proceed (which is unlikely to happen in the absence of the Order) and the private rights which will be affected by the Order.
- 8.12 OPDC has carefully considered the matters it has to balance in reaching its decision to progress the Order, and has decided that there is a compelling case in the public interest to proceed with making it, so as to enable the redevelopment of the Order Land to proceed.

9. **EQUALITIES IMPACT**

9.1 As a public body, OPDC is bound by the Public Sector Equality Duty (PSED) in section 149 of the Equality Act 2010.

9.2 OPDC must have regard to the need to:

- (a) eliminate unlawful discrimination, harassment, victimisation;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

9.3 OPDC has undertaken an equalities impact assessment (EqIA) to assess the impacts of the Order and wider regeneration proposals on groups who share relevant protected characteristics. The EqIA demonstrates how OPDC has discharged the PSED and sets out planned actions to support compliance through future stages of development.

9.4 The EqIA concludes that the wider regeneration proposals will contribute to improvements in the area that can be shared by groups with protected characteristics. These include:

- (a) A net increase of approximately 8,000 new homes on-site. This includes affordable housing, including social housing. Plans also include family housing, which can be of particular benefit to protected characteristic groups living in the area. Affordability barriers may make it harder for certain groups, including low-income, ethnic minority households, children living in low-income households and (mainly female-headed) single parent households, from sharing in this benefit. OPDC aim to ensure that affordability targets of the development are met and that local people can benefit from this housing.
- (b) Employment creation in construction related jobs, as well as up to 150,000 – 200,000 sqm of new commercial space on the site creating significant further employment opportunities. With appropriate procurement and skills, employment and education plans in place then this can benefit those who are overrepresented in unemployment figures in the area especially young black people.
- (c) An increase in public open space, including improved public realm and increased accessibility and connectivity to public transport and active travel networks. People sharing equality protected characteristics are likely to be able to share in these benefits if they are designed in line with inclusive design standards and in collaboration with the local community.
- (d) A new urban centre including a new high street, shops cafes, restaurants, schools and other community amenities such as a new school. Community engagement is helping to shape proposals.
- (e) 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.
- (f) Opportunity for new accommodation with improved facilities for businesses on-site and increased footfall, transport links and increased customer base for remaining businesses.

9.5 However, the assessment shows that there are some direct potential negative impacts associated with the CPO process:

- (a) Loss of homes for a small number of owner-occupiers.
- (b) Loss of private rental accommodation on-site affecting a small number of existing ethnic minority tenants including those with children.
- (c) Loss of Council run temporary accommodation on-site and two housing association managed homes.
- (d) Potential loss of businesses claiming to provide a mix of culturally specific services and goods as well as potential loss of cultural and social connections.
- (e) Potential closure of independent businesses including ethnic minority owned businesses.
- (f) Temporary or permanent loss of employment following closure or relocation of affected businesses amongst ethnic minority employees.
- (g) Some protected characteristic groups may be more vulnerable to construction related impacts such as noise, air quality, traffic disruption, safety and security issues.
- (h) The regeneration of the area could also result in increased property prices which in turn may result in higher rents for local residents.

9.6 An EqIA Action Plan has been developed to mitigate the potential direct and indirect effects of the Order and to support scheme development regarding the potential wider regeneration equality outcomes. The Action Plan describes for 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.

10. **'CONCLUSION**

10.1 OPDC's mission across the OPDC Area is to capitalise on the significant HS2 and Elizabeth Line (Crossrail) investment at Old Oak Common to deliver high quality homes and jobs to facilitate London and UK growth and global competitiveness.

10.2 The Order Land provides a significant opportunity for the comprehensive regeneration of public sector land at Old Oak, much of which is or will become surplus to operational needs. The Regeneration Proposals can only be achieved through the acquisition of private interests in the Order Land which now account for approximately 7 per cent of the outstanding land needs to be acquired. The CPO is also required to enable OPDC to acquire the necessary interests and rights required to construct and deliver the Regeneration Proposals.

10.3 The current fragmented ownership of the Order Land, alongside the early strategic infrastructure required to unlock the redevelopment of the Order Land act as a barrier to the regeneration of the Order Land and Old Oak as a whole.

10.4 OPDC is satisfied that the delivery of the Regeneration Proposals are unlikely to be blocked by any physical or legal impediments.

10.5 OPDC has considered and applied the advice in the Guidance and has set out its view that the Order is an appropriate use of its statutory powers and meets the provision and requirements of the Guidance. In particular, the Order is in line with the recently introduced sections of the Guidance relating to Mayoral Development Corporations which encourage proactive intervention to assemble land in order to facilitate regeneration

- 10.6 Appropriate steps have been taken to seek to acquire the land and interests required for the delivery of the Regeneration Proposals by agreement, however it is clear that compulsory acquisition is necessary to acquire the remaining interests in the Order Land to facilitate the comprehensive regeneration of the Order Land.
- 10.7 Negotiations are continuing and attempts to acquire as many of the outstanding interests as possible by agreement will continue throughout the CPO process.
- 10.8 OPDC is firmly of the view that there is a compelling case in the public interest to use its powers of compulsory acquisition and therefore make the Order which will facilitate the delivery of the Regeneration Proposals.

11. **ADDITIONAL INFORMATION**

General Information

- 11.1 The Order, Order map and schedule of interests can be inspected during normal office hours at the following address: [●]
- 11.2 The additional documents listed in appendix 1 to this Statement of Reasons, which OPDC may also refer to at any public inquiry, can be inspected during normal office hours at the [●]. OPDC reserves the right to add or remove documents from this list in the light of any objections and representations made in respect of the Order.
- 11.3 All of the documents can also be viewed online at [●].
- 11.4 Persons requiring further information regarding the Order should contact [●] at OPDC by email to [●] or by telephone on [●].
- 11.5 Owners and occupiers of the Order Land who wish to negotiate a sale or discuss matters of compensation should contact [●] at [●] by email to [●] or by telephone on [●].
- a. Details of any views which may have been expressed by a Government department about the proposed development of the Order Land
- [●].

The scheme for the purposes of assessing compensation

- 11.6 Section 6A of the Land Compensation Act 1961 sets out the "no-scheme" principle for the purposes of assessing compensation. Section 6D elaborates on the meaning of the "scheme" for the purposes of the "no-scheme" principle and section 6D(2)(c) provides that, where an acquiring authority is authorised to acquire land in connection with the development of an area designated as a Mayoral development area under section 197 of the 2011 Act, the "scheme" is defined as the development of any land for the purposes for which the area is or was designated.
- 11.7 As such, the scheme to be disregarded for the purposes of assessing compensation in the "no-scheme world" is the development of any land within the OPDC Area.

Statutory Procedures

- 11.8 Any objection or other representation concerning the Order must be made in writing to [●] and should state the title of the Order and the grounds of objection or representation.
- 11.9 If objections to the Order are received from any person who is an owner, lessee or occupier (except tenants for a month or a period less than a month) of the Order Land and such objections are not withdrawn, then an opportunity will be given by the Secretary of State for objectors to state their views at either a public inquiry or hearing before an independent inspector after the end of the objection period.
- 11.10 If a public inquiry or hearing is to be held, all objectors will be notified individually at least 6 weeks beforehand and those who have made representations or wish to support the proposals will be similarly informed. Notice of any public inquiry or hearing would also be published in the local press.
- 11.11 It should be noted that it might be necessary to communicate the substance of all comments received to other people. If a public inquiry or hearing is held, letters of objections and other representations would be passed to the inspector holding the public inquiry or hearing.

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11.12 This Statement of Reasons for making the Order is not intended to discharge OPDC's obligations under the Compulsory Purchase by Non-Ministerial Acquiring Authorities (Inquiries Procedure) Rules 1990 should a public inquiry be held.

APPENDIX 1

ADDITIONAL DOCUMENTS AVAILABLE FOR INSPECTION

Land Assembly and Relocation Strategy

Strategic Outline Business Case + Appendices (Redacted)

Old Oak West Outline Business Case + Appendices (Redacted)

OPDC Regeneration Strategy

Old Oak Illustrative Masterplan

Old Oak Supplementary Planning Document

Draft Equality Impact Assessment

Old Oak Compulsory Purchase Order (CPO)

DRAFT Equality Impact Assessment

Old Oak and Park Royal Development Corporation

July 2025

Quality information

Prepared by	Checked by	Verified by	Approved by
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Revision History

Revision	Revision date	Details	Authorized	Name	Position
V1	20/01/25	Draft EqIA	NS	Nina Schuler	Technical Director
V2	01/07/25	Final Draft EqIA	DW	Dave Widger	Technical Director

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Executive Summary

The Old Oak and Park Royal Development Corporation (OPDC) commissioned AECOM to provide an Equality Impact Assessment of the potential equality impacts on residents and businesses associated with a Compulsory Purchase Order (CPO) which may be required to facilitate the regeneration at Old Oak. OPDC is a Mayoral Development Corporation established to oversee the regeneration of the Old Oak opportunity area. OPDC is seeking to transform one of London's most inaccessible areas into a new well-connected urban centre and transport interchange through the delivery of new housing and commercial developments surrounded by sustainable neighbourhoods and open space. As a public corporation, OPDC has a duty under the Equality Act 2010 and the associated Public Sector Equality Duty (PSED) to ensure that when exercising its powers it has due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between those with a protected characteristic and all others.

The purpose of this EqlA is to demonstrate how OPDC has discharged the PSED in the early stages of the Proposed Regeneration and outline actions that may be taken to support compliance as they progress with regeneration. To fulfil this purpose, this EqlA considers how the CPO would contribute to the realisation of equality effects of businesses and residents affected and aims to understand the needs and requirements of the local community in terms of regeneration outcomes through desk-based review and primary research.

A Draft EqlA was developed in January 2025 to provide OPDC with an early indication of potential direct, indirect and wider equality issues and actions to minimise any negative impacts or enhance any positive impacts identified. This EqlA reflects updates to land acquisition and progress towards further recommendations and the EqlA Action Plan as of June 2025. This EqlA will support the making of the CPO in Summer 2025.

A desk-based review of relevant policies and legislation, planning documents, and documents associated with the Old Oak development outlined in **Chapter 3** (including the Old Oak equalities baseline produced by Arup in 2023 shown in **Chapter 4**), informed the scope of themes and issues for the assessment of potential equality impacts. AECOM's Primary Research Team then undertook in-person surveys with directly affected businesses and residents to identify key protected characteristic groups of residents and business owners/ managers and insight into the circumstance of these groups should the CPO currently under consideration be made. The primary research also captured the views, opinions and ideas with respect to the wider regeneration project for both directly affected interests, and those likely to be affected by the wider regeneration proposals (outlined in **Chapter 5**). Following updates to the land assembly summary and Order Land, further surveys with new residential and business interests were undertaken in June 2025.

The desk-based review and analysis of the primary research findings informed the assessment of potential equality impacts associated with the regeneration of Old Oak for protected characteristic groups outlined in **Chapter 7**. The direct impacts of a potential CPO on affected residential and commercial interests were considered across the EqlA themes and objectives (see **Table 2-2**) including housing; employment, jobs and skills; neighbourhood and community; and health and wellbeing. The potential direct impacts of the CPO have been identified as loss of homes for owners and tenants, loss of business and employment for those who own businesses and work in the area and loss of community facilities. Such impacts could have differential or disproportionate effects on specific equality groups. The indirect impacts on residents and businesses as a result of land and property acquisition were also considered under these themes. As of June 2025, the loss of a community centre that serves the Muslim community is the focus of the indirect impacts. The wider regeneration impacts on existing local residents, businesses, employees and visitors that may apply in the longer-term as a result of the Proposed Regeneration were considered within these themes in addition to transport and connectivity. The wider regeneration impacts of both construction and operation were assessed.

Following this assessment, an EqlA Action Plan has been developed in collaboration with OPDC. This focuses on the development of Resident and Business Relocation Strategies that consider and outline appropriate support being provided to directly affected interests, including signposting to Independent Residential Advisors and specific considerations for temporary accommodation tenants needs.

Further actions for OPDC to consider throughout scheme development are also outlined, such as a Community Engagement/ Communications Plan, housing strategies and construction and environmental management. Progress towards these actions as of June 2025 has been outlined. This includes a Land Assembly and Relocation Strategy, Regeneration Strategy and Illustrative Masterplan. Tailored mitigation measures for the direct, indirect and wider regeneration impacts have also been set out.

As OPDC is in the early stages of scheme development, this EqlA focuses on the potential direct impacts associated with the CPO and indirect impacts associated with land and property acquisition whilst also considering longer-term impacts of the scheme itself. As the regeneration proposals develop, the wider regeneration impacts of regeneration and regeneration equality outcomes, and associated actions within the EqlA Action Plan, will become more refined and focused. This EqlA and the EqlA Action Plan (see **Chapter 8**) contained within should be considered as live documents that are updated and monitored at key stages of development for the Proposed Regeneration.

DRAFT

1. Introduction

1.1 Purpose

AECOM has been commissioned by Old Oak and Park Royal Development Corporation (OPDC) to provide an Equality Impact Assessment (EqIA) of the potential equality impacts on residents and businesses associated with a Compulsory Purchase Order (CPO) which may be required to facilitate the Old Oak development (the Proposed Regeneration).

As a public corporation, OPDC has a duty under the Equality Act 2010 and the associated Public Sector Equality Duty (PSED) to ensure that when exercising its powers it has due regard to the need to eliminate unlawful discrimination, to advance equality of opportunity and foster good relations between those with a protected characteristic¹ and all others. This EqIA recognises the early stage of the Proposed Regeneration and demonstrates how OPDC have discharged the PSED and the actions that may be taken to support compliance as they progress with future stages of development.

An EqIA is a systematic assessment of the effects of plans, policies, or proposals on groups with protected characteristics as defined by the Equality Act 2010 as well as socio-economic disadvantage. The purpose of this EqIA is two-fold:

- To consider how the CPO would contribute to the realisation of equality effects of businesses and residents affected; and
- To understand the needs and requirements of the local community in terms of regeneration outcomes.

The consideration of potential direct and indirect equality impacts associated with the CPO process and wider impacts of regeneration and regeneration equality outcomes on the Old Oak area are outlined in **Chapter 7**. This draws on evidence from secondary data sources as well as primary research undertaken for the purpose of the EqIA in August/September 2024 and in June 2025.

A Draft EqIA was developed in January 2025 to provide OPDC with an early indication of potential direct, indirect and wider equality issues and actions to minimise any negative impacts or enhance any positive impacts identified. This EqIA reflects updates to land acquisition and progress towards the EqIA Action Plan as of June 2025. This EqIA will support the making of the CPO in Summer 2025.

As OPDC is in the early stages of scheme development, this EqIA focuses on the potential direct impacts associated with the CPO and indirect impacts associated with land and property acquisition, whilst also considering longer-term impacts of the Proposed Regeneration itself. As the regeneration proposals develop, the wider impacts of regeneration and regeneration equality outcomes, and associated actions within the EqIA Action Plan, will become more refined and focused. Thereby, the EqIA and EqIA Action Plan should be considered as live documents that are updated and monitored at key stages of development for the Proposed Regeneration.

1.2 Context

1.2.1 The Proposed Regeneration

The Mayor of London established OPDC in 2015 as a 'Mayoral Development Corporation' under the powers of the Localism Act (2011) to oversee the regeneration of the Old Oak opportunity area. OPDC has a number of key aims, outlined in OPDC's Local Plan (2018 to 2038)², including:

- Transforming one of London's most inaccessible areas into a well-connected, world-class transport interchange;

¹ Protected characteristics are defined under the Equality Act 2010: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation and marriage/civil partnership.

² OPDC (2022) OPDC Local Plan 2018 to 2038. Available at: [opdc_local_plan_2022_june_2022_including_appendix_0.pdf](https://www.opdc.gov.uk/opdc-local-plan-2022-june-2022-including-appendix-0.pdf) ([london.gov.uk](https://www.london.gov.uk))

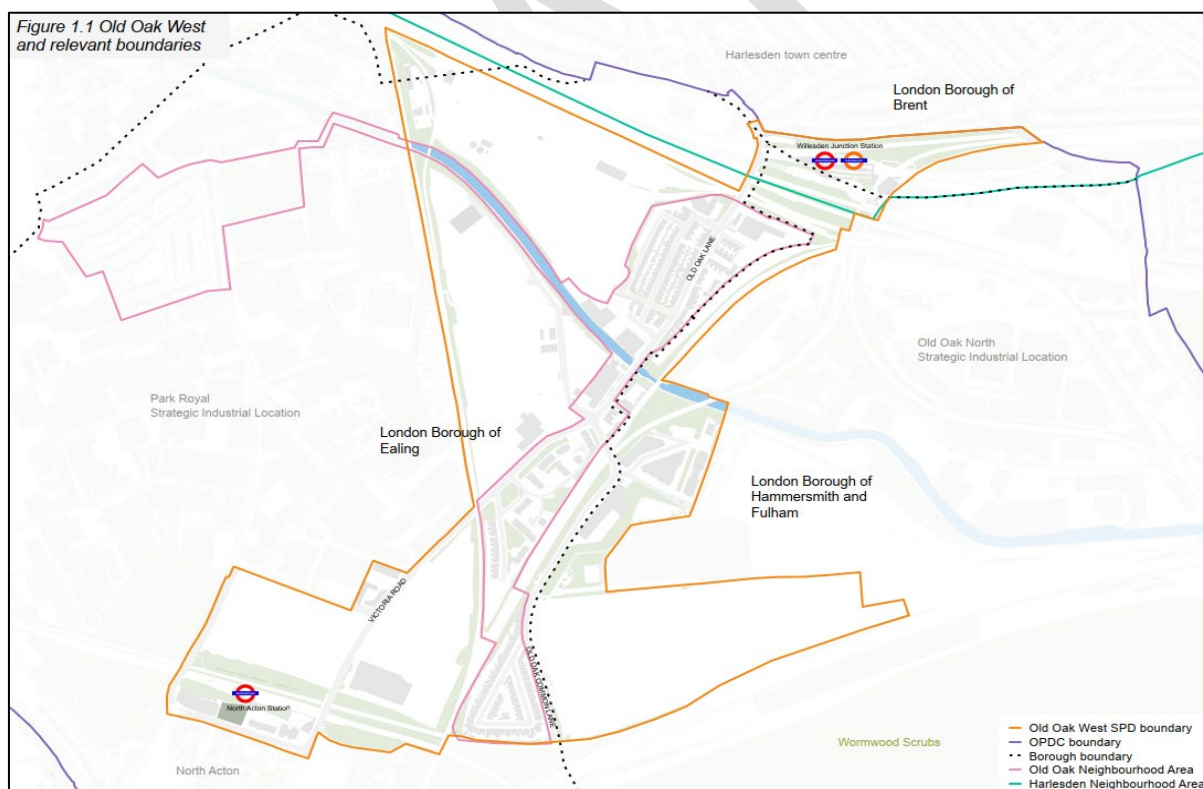
- Enabling delivery of new housing and commercial development, surrounded by sustainable and thriving neighbourhoods and valued open space;
- Protecting, strengthening and intensifying Park Royal and Old Oak; and
- Protecting and improving Wormwood Scrubs.

Within this, the Old Oak opportunity area spans over 155 hectares covering three local authorities: Ealing, Hammersmith & Fulham, and Brent, and broadly follows the length of Victoria Road and Old Oak Common Lane, between North Acton and Willesden Junction rail stations, and is bound by Wormwood Scrubs to the south-east and Scrubs Lane to the north-east. The specific Old Oak study area is shown in **Figure 1-1** below (outlined in orange).

Old Oak comprises around 75 acres of developable land owned by public sector stakeholders which includes those currently in use as HS2 construction sites for the new Old Oak Common station and Park Royal, which is one of the UK's largest industrial estates. There are also varied residential typologies including low density two storey Victorian, Edwardian and interwar housing, three-four storey apartment buildings along Shaftsbury Gardens and at Kildun Court and new high-density housing at the Collective, Oaklands Rise and 80 Goodhall Street.

The Grand Union Canal, railway lines, embankments, freight terminals and varied town centre uses including Fisherman's Arms Public House and Old Oak Café feature in the study area. Future development in Old Oak will be centred around the planned Old Oak Common Station as a key station on the High Speed 2 (HS2) rail project.

Figure 1-1: Old Oak study area



Source: Old Oak West Supplementary Planning Documents³

³ London Assembly (2024). Old Oak West Supplementary Planning Documents. Available at: [Old Oak West Supplementary Planning Document \(SPD\) | London City Hall](#)

In 2023, OPDC held engagement with local communities to gather feedback on the Old Oak area, informing the adopted Old Oak West supplementary planning guidance.⁴ Building on this feedback and the planning guidance, OPDC developed a set of emerging principles for the area which formed the foundations of the future Regeneration Strategy and masterplanning. These include:

- **A new east-west bridge:** connecting the new Old Oak Common Station to North Acton and Park Royal to greatly improve connectivity, promoting active travel reducing pedestrian journey times.
- **A high street for every day:** connecting Harlesden to North Acton, lined with shops, services, amenities and workspaces, designed for pedestrians and cyclists, with trees and greening and space for the community.
- **Two new neighbourhoods:** building on and celebrating the distinctive characteristics of Old Oak, with a Canalside neighbourhood to the north, made up of shops, a new local park and amenities, servicing existing and new residential communities, and a mixed-use area to the south, a major new town centre with workspace and highstreets close to the new Old Oak Common station.

OPDC has since produced a Regeneration Strategy⁵, published in May 2025. This Strategy outlines OPDC's vision for the comprehensive regeneration of Old Oak and will guide the development of Old Oak over the next 25 years.

This Strategy outlines the six regeneration objectives that underpin the actions OPDC will take to deliver the Proposed Regeneration as follows:

- **Build a place to call home** - deliver a diverse mix of high-quality, genuinely affordable homes that support community cohesion and meet the needs of people at different life stages;
- **Make a place to be proud of** - create a distinctive and inclusive neighbourhood with vibrant public spaces, cultural venues, and community facilities that reflect local identity and heritage;
- **Drive inclusive economic growth** - generate local employment, supporting skills development, and fostering a dynamic business environment that benefits residents and attracts investment;
- **Create a thriving environment** - prioritise sustainability by enhancing green infrastructure, promoting active and public transport, and improving environmental quality and climate resilience;
- **Deliver at pace** - accelerate development through strong partnerships, efficient planning, and early delivery of key projects to build momentum; and
- **Ensure value** - maximise public benefit, ensuring transparency in decision-making, and securing long-term stewardship to maintain and reinvest in the area;

The Regeneration Strategy outlines the high-level regeneration proposals of Old Oak, including: enabling the construction of up to 8,000 new and affordable homes, up to 2.5 million ft² of commercial space, 1km of canal enhancements, up to 20 acres of high-quality publicly accessible open space, 6 acres of parks and green space and new high streets with shops, cafes, restaurants and local services and amenities.

OPDC have published an Illustrative Masterplan to provide a spatial representation of how the Proposed Regeneration could be delivered. Stakeholder and public consultation on the Illustrative Masterplan was undertaken from 17th-22nd May 2025 in the form of local drop-in sessions and an online event.⁶ The Illustrative Masterplan is intended to form a part of a wider Masterplan Framework Document that advances spatial principles and facilitates engagement with key stakeholders on the regeneration of Old Oak. The area under review in this EqlA report was previously known as Old Oak

⁴ London Assembly (2024). Old Oak West Supplementary Planning Documents. Available at: [Old Oak West Supplementary Planning Document \(SPD\) | London City Hall](#)

⁵ OPDC (2025). OPDC Regeneration Strategy. Available at: [OPDC Regeneration Strategy | London City Hall](#) [accessed 20/05/25]

⁶ OPDC (2025). Old Oak: Illustrative Masterplan. Available at: [Old Oak | OPDC have your say](#) [accessed 20/05/25].

West, as reflected in earlier documents. However, in accordance with updated directives, this report now refers to the area as 'Old Oak' throughout.

1.2.2 Land acquisition and Compulsory Purchase

In order to secure all the land and rights required to deliver the regeneration of Old Oak, OPDC will consider the use of its compulsory purchase powers to facilitate land assembly.

However, OPDC has been working with freeholders and occupiers to support the release of land for development by agreement. A Land Assembly and Relocation Strategy⁷ sets out principles that OPDC apply in engaging with existing owners and occupiers of land and property within the proposed Old Oak regeneration area.

The Old Oak study area includes land where the use of compulsory purchase powers may be required ('Order Land') and is identified in **Figure 1-2**. However, the final scheme boundary is subject to further review prior to the order being made. The Order Land includes publicly owned land, which comprises approximately 83% of the total area of Old Oak and the remaining 17% of land is privately held in disparate ownerships. There are also several private occupiers on the publicly owned land.

In **Figure 1-2**, the blue shaded areas indicate land in which new rights are to be permanently acquired to facilitate construction works and the Proposed Regeneration. The pink shaded areas indicate land in which interests may be subject to CPO, comprising the majority of the Order Land including approximately:

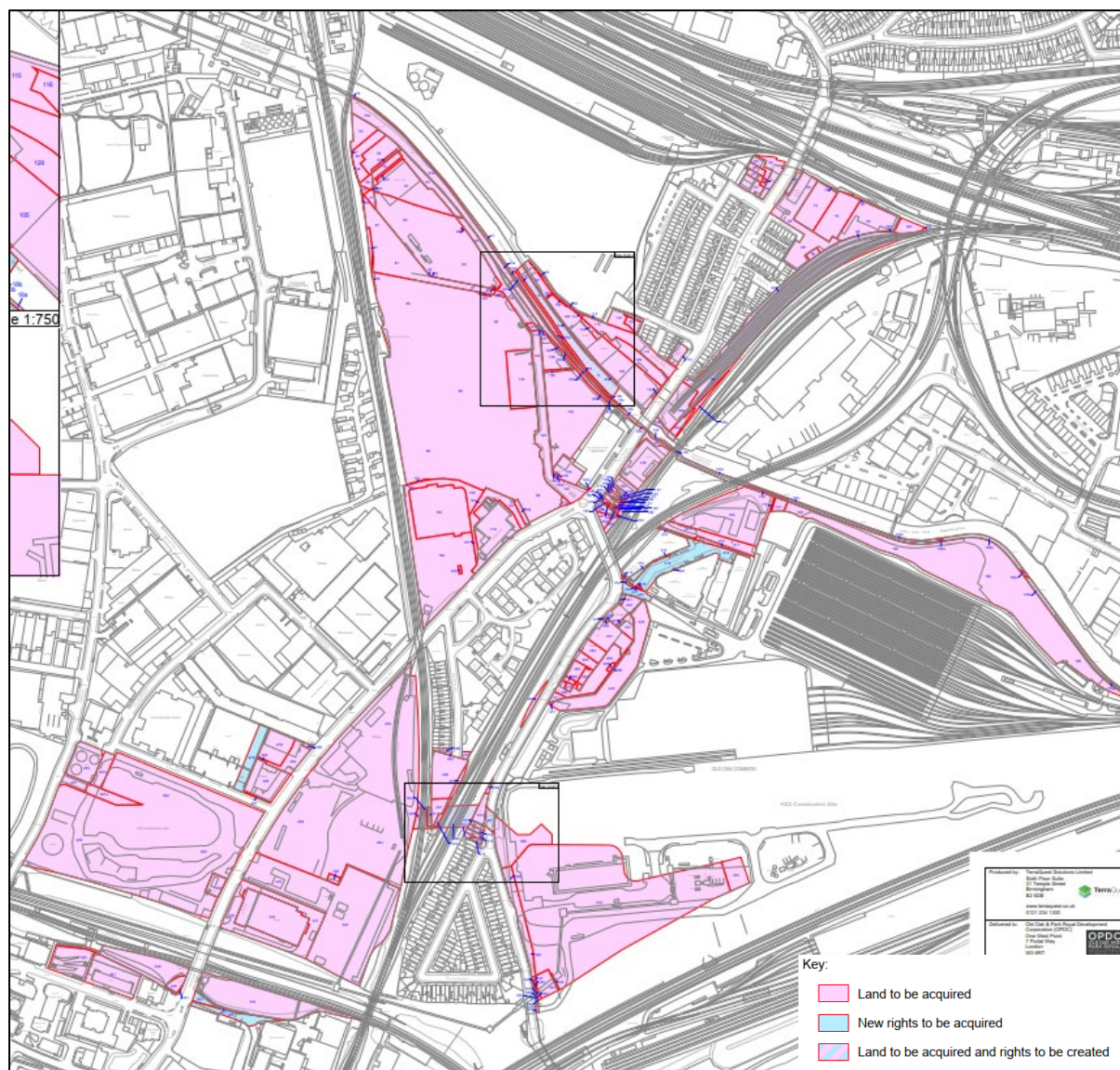
- 21 studio flats of temporary accommodation⁸;
- 25 residential properties;
- 35 businesses;
- 2 car parks; and
- Current HS2 work sites.

Pursuant to the approval of the Outline Business Case in March 2024, OPDC, Ministry of Housing, Communities and Local Government, Department for Transport, Network Rail and HS2 committed to enter into an agreement for the release of land to deliver the Proposed Regeneration and an appropriate form of Collaboration Agreement. In June 2025, the parties agreed to enter into the Collaboration Memorandum of Understanding which sets out how the parties have been cooperating in the coordination of a cross-government steering group in relation to the regeneration proposals and terms for collaboration and assurance going forward.

⁷ OPDC (2025). OPDC Board Meeting Minutes: Appendix 2 OPDC Land Assembly and Relocation Strategy. Available at: [\(Public Pack\)Agenda Document for OPDC Board, 05/02/2025 14:00](#) [accessed 20/05/25].

⁸ The temporary accommodation is let to the London Borough of Hammersmith and Fulham (LBHF) to provide temporary housing for residents at risk of homelessness whilst LBHF looks into other longer term housing options for these residents.

Figure 1-2: (Draft) Order map for the Proposed Regeneration



1.3 Report structure

Following on from this introduction section, the remainder of the report is structured as follows:

- **Chapter 2:** Methodology - provides an overview of approach to and scope of desk-based review, primary research, assessment of impacts and the EqIA Action Plan;
- **Chapter 3:** Policy and legislation review - providing context through relevant national, regional and local policy and legislation associated with equalities and planning;
- **Chapter 4:** Evidence review - comprises a capture of key demographic and population data and key local themes and issues to form an understanding of the local and wider community;
- **Chapter 5:** Primary research findings - summary of findings from the direct business and resident and indirect business and resident surveys undertaken for the purpose of the EqIA;
- **Chapter 6:** Stakeholder consultation – summary of findings from the stakeholder consultation undertaken for the purpose of the EqIA;
- **Chapter 7:** Assessment of impacts - an assessment of impacts and equality effects informed by the evidence base and findings from primary research;

- **Chapter 8:** EqlA Action Plan - an outline action plan developed in collaboration with OPDC identifying actions to manage and mitigate equality impacts; and
- **Chapter 9:** Conclusions and next steps.

DRAFT

2. Methodology

2.1 Scoping Report

An EqlA Scoping Report for the Old Oak CPO was produced in October 2024⁹ with the purpose of outlining the scope of components to inform the full EqlA. The approach to undertaking the Scoping Report followed a three-stage process:

1. **Desk-based review** – including relevant national, regional, and local policies and legislation, planning documents, and documents associated with the Old Oak development. This includes a review of the Old Oak equalities baseline produced by Arup in 2023. This desk-based review has directly informed Chapter 3 and 4 of this report.
2. **Site familiarisation visit** – a site visit was undertaken in May 2024, accompanied by the OPDC client team, to gain first-hand insight into the project area, local businesses, residences and key locations within the Old Oak site.
3. **Scope of EqlA and next steps** – the Scoping Report outlined a structure and scoping of themes and issues for the full EqlA, informed by the evidence gathered in the desk-based review. It also set out the planned approach for primary research..

2.2 Primary research

Further primary data collection was required to provide more detailed information on those potentially directly affected by the CPO as well as others living in the area. The research aimed to identify:

- Key protected characteristic groups of residents and business owners/ managers in the area;
- Insight into the circumstance of residents and businesses should the CPO currently under consideration be made, including preference in relocation; and
- Views, opinions and ideas with respect to the wider regeneration project for different groups.

2.2.1 Approach to surveys

The primary research took the form of in-person surveys with businesses and residents. These were carried out by AECOM's primary research team between **27th August - 20th September 2024**. The content of the surveys was developed in partnership with OPDC and all interests were approached up to three times to participate in the surveys. The research comprised the following:

- **Direct surveys:** These surveys were designed for those who are potentially directly impacted by the potential CPO, including all affected residential, commercial and community interests located within the pink areas of the Order Land shown in **Appendix A**.¹⁰
- **Wider regeneration surveys:** These surveys were designed for those who are not likely to be subject to acquisition but currently live in the areas located within 50m of the Order Land in **Appendix A**. The primary research aimed to collect 50 surveys from a sample of 100 residential properties in a 50m buffer outside of the red line boundary. The purpose of these surveys was to get a better understanding of the demographic breakdown of those living in or near the Old Oak development site, their views on the regeneration project and to identify priorities for regeneration across different groups.

The need to represent the views and opinions of protected characteristic groups was acknowledged when sampling interests for the wider regeneration surveys; for example, Bashley Road Travellers Site. A particular effort was made to undertake these surveys in a way that accommodated the needs of the group.

⁹ Scoping report was drafted in July 2024 and finalised in October 2024.

¹⁰ For the purpose of the surveys, we used the indicative boundary from July 2024. This was the most up to date Order Map as of 27th August 2024 and was subject to changes following primary research.

Prior to primary research taking place, OPDC sent a soft-landing letter to all residents within Old Oak in the week commencing 5th August outlining upcoming facts and events relating to the regeneration opportunity, including AECOM's equality surveys. Following this communication, AECOM sent a notification letter to all directly affected businesses and residents and selected indirectly affected businesses and residents in the week commencing 12th August 2024. This explained the purpose of the research, timing of surveys and to encourage participation (see **Appendix B**).

2.2.2 Additional surveys

Changes to the Order Land (shown in **Figure 1-2**) and the land assembly schedule as of June 2025 identified 6 additional business occupiers and 6 residential occupiers that may be directly impacted by the potential CPO.

AECOM's primary research undertook in-person surveys with these additional business and residential interests in June 2025.

2.2.3 Stakeholder consultation

In addition, 15 key stakeholders were identified by OPDC and contacted via email for comment on the potential impact the regeneration could have on the organisations' activities, employees and/ or customers, especially those with protected characteristics. These stakeholders were:

- Canal & River Trust;
- The Secretary of State for Transport;
- Ealing Council;
- Brent Council;
- Hammersmith and Fulham Council;
- Transport For London;
- Network Rail Infrastructure Limited;
- Rail for London Limited;
- London Underground Limited;
- London Bus Services Limited;
- Arriva Rail London Limited;
- Places for London Limited;
- Southern Electric Power Distributions plc;
- SSE Services plc; and
- UK Power Networks

All participants of the primary research were informed that the data they provided would only be used for the purpose of the CPO EqlA and to help identify equitable regeneration outcomes.

2.2.4 Primary research analysis

Overall, 97 responses were received across the direct and wider regeneration surveys. **Table 2-1** below shows a breakdown of responses per survey.

Table 2-1: Breakdown of direct and wider regeneration survey responses

Survey	Completed Interviews
Direct Business	22
Direct Resident	19
Wider Businesses	2
Wider Residents	54

Primary research analysis was composed of three stages:

- **Quantitative Data Analysis:** Each interviewer's data was checked and cross-checked against other interviewers. Data was imported into Statistical Package for the Social Sciences (SPSS) where additional data cleaning and validation were completed.
- **Analysis and reporting:** Frequencies of all variables were run to check for cleaning requirements and/ or for analysis of outputs. The data was also cross analysed by demographical information such as age, gender, ethnicity to identify any significant differences.
- **Coding for analysis:** Coding based on survey responses was undertaken to analyse qualitative data. All codes were used to analyse key themes and insight from the survey responses.

Findings of the primary research are summarised within **Chapter 5** of this report. Data has been presented at an area/group level and not on an individual basis to comply with data protection and confidentiality requirements.

2.3 Assessment of impacts

An assessment of equality impacts was undertaken using information gathered through the desk-based review and primary research activities. The assessment considers the potential impacts on protected characteristic groups defined in the Equality Act 2010 as:

- **Age:** This refers to persons defined by either a particular age or a range of ages;
- **Disability:** A disabled person is someone who has a physical or mental impairment (lasting more than a year) that has a substantial adverse effect on their ability to carry out normal day-to-day activities;
- **Gender Reassignment:** This refers to a person who is proposing to undergo, is undergoing, or has undergone a process for the purpose of reassigning their gender identity;
- **Marriage and Civil Partnership:** Marriage can be between a man and a woman or between two people of the same sex. Civil partners must not be treated less favourably than married couples;
- **Pregnancy and Maternity:** Pregnancy is the condition of being pregnant and expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth; **Race:** Under the Equality Act 2010 race includes colour, nationality (including citizenship) and ethnic or national origins;
- **Race:** Under the Equality Act 2010 race includes colour, nationality (including citizenship) and ethnic or national origins;
- **Religion or Belief:** Religion means any religion and a reference to religion includes a reference to a lack of religion. Belief means any religious or philosophical belief and a reference to belief includes a reference to a lack of belief;
- **Sex:** This refers to a man or to a woman, or to a group of people of the same sex; and,

- **Sexual Orientation:** this means a person's sexual orientation towards persons of the same sex, persons of the opposite sex, or persons of either sex.

Although income is not classed as a protected characteristic under the Equality Act 2010, the assessment of impacts also considers the additional impact of disproportionate and differential effects on those groups with protected characteristics from low-income households.

The assessment considers:

- **Differential impacts** – i.e. an impact that affects members of a protected characteristic group differently from the rest of the general population because of specific needs, or a recognised vulnerability or sensitivity associated with their protected characteristic.
- **Disproportionate impacts** – i.e. an impact that has a proportionately greater effect on a protected characteristic group than on the general population overall within Old Oak due to a greater presence of that group. In some cases, protected characteristic groups may be subject to both differential and disproportionate equality effects.

In addition to assessing the equality impacts on those directly affected by the potential CPO, indirectly affected by land and property acquisition the assessment also identifies the potential negative and positive wider regeneration impacts on other businesses, residents and visitors to the area. It also includes wider equality outcomes that may be a result of the regeneration proposals (which may be realised as a result of the CPO). Therefore, three types of impacts/ outcomes are considered in the assessment framework:

- **Direct Impacts:** These include potential direct impacts of the CPO on affected residential and commercial interests;
- **Indirect Impacts:** This includes where acquisition agreements have been made with affected residential and commercial interests, but residual impacts for protected characteristic groups may occur as a result of the acquisition; and
- **Wider Regeneration impacts:** The wider impacts of the regeneration on existing local residents, businesses, employees and visitors (not subject to acquisition or CPO). .

The equality impacts associated with the above have been assessed using a set of key equality themes and objectives. These have been aligned with principles set out in the Old Oak West Supplementary Planning Document (SPD) that should be considered in the development of regeneration proposals; further detail on the SPD is outlined in **Section 3.4**.¹¹ This assessment framework is set out in **Table 2-2**.

¹¹ OPDC (2024). Old Oak West Supplementary Planning Document. Available at: [Old Oak West Supplementary Planning Document \(SPD\) | London City Hall](#)

Table 2-2: EqlA assessment framework

EqlA theme and objective	Aligned SPD Principles
Housing Inclusive and accessible housing for all	HP1 Housing: contribute to the delivery of new homes across Old Oak ranging in tenure, type and size to meet diverse housing needs.
Employment, jobs and skills Deliver employment and training opportunities for all	EP1 Jobs and local access to training, employment and economic opportunities. SP5 A strong, resilient and diverse economy, which allows existing businesses to thrive and grow and supports the introduction of new businesses to the area: a fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.
Neighbourhood and community Placemaking to provide safe, clean and accessible facilities for communities	TCCP1 Town centre uses and areas: deliver wide range of town centre and community uses that meet the needs of local people. TCCP2 Social infrastructure and sports facilities: deliver social infrastructure that is high quality, accessible, inclusive and colocated with publicly accessible open spaces to support social interaction.
Health and wellbeing Access to key services and facilities for improved community health and wellbeing	GGP1 Good Growth and Social Value: contribute to delivering Social Value by improving health and wellbeing, fairness and day-to-day quality of life. EUP2 Open spaces locations and design: deliver and/or positively contribute towards a well-designed open space network that provides for the needs of people living, working and visiting Old Oak.
Transport and connectivity Deliver equitable access to transport and enhanced connectivity for the local community	TP1-TP6 Transport: including <ul style="list-style-type: none"> • Contribute to safe, inclusive and accessible walking, cycling, bus and street network • New and enhanced connections within OPDC development area • Promote use of the Grand Union Canal for passengers, leisure and freight transport • Deliver Old Oak Common Station as an exceptionally designed 21st century station and transport interchange integrated into the wider movement network • Present Willesden Station, North Acton and the potential Old Oak Common Lane Station as improved high-quality stations

2.4 EqlA Action Plan

An EqlA Action Plan has been developed in collaboration with the client team. The Action Plan identifies actions to manage and mitigate the potential negative equality effects identified through the impact assessment and identify opportunities to enhance positive impacts and equality of opportunity. This will support OPDC in meeting the equality objectives and inform future stages of proposed development.

Where possible, the Action Plan includes timescales and a responsible owner for each action. These timescales acknowledge that OPDC is currently in the early stages of scheme development and

thereby prioritises actions to address the direct impacts associated the CPO while also identifying further recommendations which will be refined as the regeneration proposals are developed.

The EqlA and EqlA Action Plan should be considered as live documents that are updated, refreshed and the actions within them monitored on a regular basis. This should include a monitoring update on the status of identified potential impacts and associated mitigation, which may require updated both to assessment of the impacts and recommendations relating to the proposed mitigation measures. In particular, as the regeneration proposals develop the wider regeneration impacts and regeneration equality outcomes will become more focused and the accompanying further recommendations set out in the EqlA Action Plan will require updates.

A Draft EqlA and EqlA Action Plan were developed in January 2025 to provide OPDC with an early indication of potential equality effects and actions to minimise any negative impacts or enhance any positive impacts identified. In line with the above, this EqlA reflects updates to the Draft EqlA and EqlA Action Plan as of June 2025, including updates to land acquisition and progress towards further recommendations and actions within the Action Plan.

DRAFT

3. Legislation, policy, and planning review

3.1 Legislation

3.1.1 Equality Act 2010 and Public Sector Equality Duty (PSED)

The Equality Act 2010 is a major piece of UK legislation which provides the framework to protect the rights of individuals with the following nine protected characteristics (as outlined in **Section 2.3** of this report) against unlawful discrimination and to advance equal opportunities for all.

Section 149 of the Equality Act sets out the PSED to which OPDC, as a public body, is subject in carrying out all its functions, including in the exercise of its CPO powers. Those subject to the PSED must, in the exercise of their functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations between people who share a protected characteristic and those who do not.

These are sometimes referred to as the three aims or arms of the PSED. The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

The Act describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.

Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first arm of the duty applies to this characteristic, but that the other arms (advancing equality and fostering good relations) do not apply.

3.1.2 Human Rights Act 1998

The Human Rights Act 1998 incorporates the rights from the European Convention on Human Rights (the 'Convention') into UK law, allowing individuals in the UK to enforce their human rights in domestic courts and holding public bodies accountable for respecting and protecting human rights.

The Act includes 16 civil and political rights, and three additional rights from the First and Thirteenth Protocol, that must be followed by public authorities and public bodies when carrying out public functions. The following Articles are relevant to the Secretary of State's decision as to include powers of compulsory acquisition:

- **Article 1 of the First Protocol¹²: Protection of Property** – no one can be deprived of their possessions except in public interest and subject to the conditions provided for by law and by the general principles of internal law.

¹² The First Protocol to the European Convention on Human Rights (ECHR) is an additional legal instrument that supplements the original Convention. It was adopted in 1952 and adds three important rights that were not included in the original 1950 Convention.

- **Article 6 of the Convention: Right to a fair trial** – in the determination of his civil rights and obligations, everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law
- **Article 8 of the Convention: Right to Respect for Private and Family Life** – protects private and family life, home and correspondence. No public authority can interfere with these rights except in accordance with the law, and so far, as is necessary in the interest of national security, public safety or the economic wellbeing of the country.

3.1.3 Compulsory Purchase Process Guidance 2025

The Ministry of Housing, Communities and Local Government set out guidance on the compulsory purchase process for England.¹³ Guidance outlines that compulsory purchase powers enable acquiring authorities to compulsorily purchase land where there is a compelling case in the public interest, as decided by the confirming authority.

The acquiring authority does not have the powers to compulsorily acquire land until the CPO is confirmed by the relevant confirming authority. However, they can acquire by agreement at any time and the general presumption is that they should endeavour to do so before acquiring by compulsion. Thereby, when preparing a CPO, the acquiring authority is expected to demonstrate that it has taken reasonable steps to understand the impact the CPO and acquisition of affected interests may have on owners and occupiers through direct engagement and attempt the acquisition by agreement of all the land and rights included in the CPO.

The acquiring authority should also demonstrate that it has considered how to mitigate any negative impacts arising from the use of compulsory purchase powers and the acquisition of land or property interests. These mitigations may be part of existing CPO and compensation frameworks, including financial compensation, or may involve specific measures tailored to address identified issues, such as relocation support or charters for affected residents and businesses. Identifying potential impacts early and planning appropriate mitigations can support constructive engagement with affected parties, potentially leading to voluntary agreements and reducing the number of objections to the CPO.

Guidance on the compulsory purchase process outlines that all public sector acquiring authorities must consider the PSED and pay due regard to the three aims of the Equality Act 2010 outlined above. For example, the guidance acknowledges that an important use of compulsory purchase powers is to help regenerate run-down areas. Although low income is not a protected characteristic in itself, it is common for people from ethnic minorities, the elderly or people with a disability to be over-represented in low-income groups. As part of the PSED, acquiring authorities must have due regard to the need to promote equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This means that the acquiring authority may need to develop a process which promotes equality of opportunity by addressing particular problems that people with certain protected characteristics might have (e.g. making sure that documents are accessible for people with sight problems or learning difficulties and that people have access to advocates or advice).

3.1.4 Localism Act (2011)

Local authorities have compulsory purchase powers under the Acquisition of Land Act 1981, the Town and Country Planning Act 1990 and other specific Acts of Parliament in order to promote development and regeneration. As a Mayoral Development Corporation, OPDC has specific compulsory purchase powers contained within S207 of the Localism Act 2011.

The Localism Act ('the Act') is aimed at redistributing decision-making from central government to local authorities and communities under four key areas:

- **New Freedoms for Local Government:** Local authorities gained more autonomy through the Act, including general power of competence, allowing them to respond to what local people want;

¹³ Ministry of Housing, Communities & Local Government (2025). Guidance on the compulsory purchase process. Available at: [Guidance on the Compulsory Purchase Process](#)

- **Community Rights:** the Act introduced new rights for community, such as the ability to bid for and run local services and assets;
- **Planning Reform:** the Act aimed to make the planning system more democratic and effective, giving local people more influence over housing and planning decisions; and
- **Housing Decisions:** the Act ensured that decisions about housing were taken locally, including reforms to social housing.

In particular, the Act specifically grants more authority over housing and regeneration to locally elected representatives in London. It enables the elected Mayor to take over housing investment activities from the Homes and Communities Agency and to continue the economic development efforts previously managed by the London Development Agency.

OPDC is a Mayoral Development Corporation (MDC) set up under Part 8, Chapter 2 of the Localism Act 2011 ('the act') with the object, as set out in section 201(1) of the act, securing the regeneration of the area for which the MDC has been established.

Section 207(2) of the Localism Act 2011 provides OPDC with the ability to promote a CPO to compulsory acquire the land and rights necessary for the purpose of securing the regeneration of its area.

3.2 National policy

3.2.1 National Planning Policy Framework (2024)¹⁴

The National Planning Policy Framework (NPPF) was adopted in July 2018 and updated with minor revisions in February 2019, July 2021, September 2023, December 2023 and most recently, December 2024.

The NPPF (2024) consolidates the Government's economic, environmental and social planning policies for England into a single document and describes how it expects these to be applied. The NPPF supersedes the majority of National Planning Policy Guidance and Planning Policy Statements and provides overarching guidance on the Government's development aims.

While the NPPF does not contain specific guidance on equalities, it does emphasise the importance of sustainable development and the need to support a healthy and just society. This is reflected in the key dimensions of sustainable development which relate to the economic, social and environmental roles of the planning system:

- The economic role contributes to building "a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure";
- The social role supports "strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect the current and future needs and support communities' health, social and cultural well-being"; and
- The environmental role contributes to protecting and enhancing the "natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy".

The NPPF identifies a range of planning policies that local planning authorities should consider when carrying out its function. Those of relevance to the regeneration planned at Old Oak, include, but are not limited to:

¹⁴ Department for Communities and Local Government (2024). National Planning Policy Framework. Available at: [National Planning Policy Framework](#)

- **Delivering a sufficient supply of homes:** significantly boost the supply of homes by ensuring local plans proactively meet identified housing needs, including affordable and specialist housing, through a mix of deliverable and developable sites. NPPF also promotes the efficient use of land, prioritising brownfield development and supporting diverse housing options to meet the needs of all community groups.
- **Building a strong, competitive economy:** supporting sustainable economic growth by creating the conditions for businesses to invest, expand, and adapt, particularly in areas with potential for regeneration and innovation. NPPF encourages planning policies that are responsive to local business needs, promote infrastructure development, and foster a diverse and resilient economy across both urban and rural areas.
- **Ensuring the vitality of town centres:** support the long-term vitality and viability of town centres by promoting their adaptation and diversification in response to changing economic and social trends. It encourages planning policies that prioritise town centre uses, support mixed-use developments, and enhance accessibility, attractiveness, and resilience to ensure these areas remain vibrant community hubs.
- **Promoting health and safety communities:** nurture inclusive communities by encouraging mixed-use developments and vibrant public spaces that foster social interaction, ensure access to essential facilities, and provide high-quality open spaces for recreation and wellbeing
- **Promoting sustainable transport:** promote sustainable transport by encouraging development that reduces the need to travel, supports active travel and public transport, and integrates transport and land use planning. NPPF encourages planning policies that prioritise pedestrian and cycle movements, improve accessibility for all, and ensure transport infrastructure supports sustainable growth.

3.3 Regional policy

3.3.1 London Plan (2021)¹⁵

The London Plan was adopted with amendments in March 2021. The London Plan (2021) is currently undergoing its five year review process as part of the Greater London Authority's efforts 'Towards a New London Plan'. Consultation on a new London Plan is expected to take place in 2026.¹⁶

The Plan includes strategic and planning policies to encourage equal life chances for all, in recognition of social inequalities existing within the city. A number of policies outlined in the Plan are relevant to the Proposed Regeneration, including tackling deprivation, promoting equality and enabling different groups to share in the benefits of development, specifically:

- **Policy GG1: Building Strong and Inclusive Communities** which builds on the idea that "good growth is inclusive growth" and requires that planning and development involves community and stakeholder engagement, provides access to good quality community spaces, and supports the creation of a London for all Londoners, where all people including protected characteristic groups (PCGs) are able to move around and enjoy the city's opportunities with ease, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation;
- **Policy SD 10: Strategic and Local Regeneration** which requires development and regeneration opportunities address inequality and deprivation across London, by allocating Strategic Areas of Regeneration and Local Areas of Regeneration. The policy also highlights the need to work collaboratively with local stakeholders and understand local community's needs so that regeneration can address the local area's most urgent issues;

¹⁵ Greater London Authority (2021). London Plan 2021: The Spatial Development Strategy for Greater London. Available at: london.gov.uk/sites/default/files/the_london_plan_2021.pdf

¹⁶ Mayor of London (no date). The next London Plan. Available at: [The next London Plan | London City Hall](https://www.london.gov.uk/what-we-do/what-we-are-doing/the-next-london-plan) [accessed 16/05/25].

- **Housing policies H1 – H16** concerning housing provision, affordable housing provision, mixed and balanced communities, housing choice and provision of associated play facilities, are all relevant to equal opportunities;
- **Design policies D6, D7 and D7**, which relate to accessible design and tall buildings, which are especially relevant here; and
- **Employment policy E11:** Skills and Opportunities for all requires that strategic development proposals should support local employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. The Plan notes continuing large inequalities in access to jobs and levels of worklessness, and that low pay and gender and ethnicity pay gaps are critical issues.

The London Plan also identifies Old Oak Park Royal as an Opportunity Area associated with the development of HS2. OPDC is responsible for driving forward regeneration in this area to optimise economic growth, create an attractive new town centre and embed the new Old Oak Common station connecting to HS2, the Elizabeth line and National Rail.

3.3.2 Inclusive London: Mayor's Equality, Diversity and Inclusion Strategy (2018)¹⁷

The Mayor's Equality, Diversity and Inclusion Strategy (EDIS) was published in May 2018. The strategy sets out how inequalities, barriers and discrimination experienced by groups protected by the Equality Act will be addressed by tackling issues such as poverty and socio-economic inequality, as well as the challenges and disadvantage facing London can be a fairer, more equal, integrated city where all people feel welcome and able to fulfil their potential. The strategy sets out 33 equality, diversity and inclusion objectives.

3.3.3 The Mayor's Equality, Diversity, and Inclusion Strategy Objectives (2022)¹⁸

In November 2022 the Mayor published a new set of equality objectives to replace those published in 'Inclusive London' in 2018. They include:

- To increase the provision of genuinely affordable homes for the benefit of those groups and communities that are most likely to live in overcrowded, poor quality or unaffordable housing. This objective includes a target of 50% affordability for all new homes across London.
- To increase the number of homes that meet Londoners' diverse housing needs including, year-on-year, the pace of provision of affordable specialist and supported housing.
- To ensure that investment in London's high streets is delivered in a way that can benefit the most deprived parts of London and can meet the expressed priorities of society's most marginalised or underrepresented groups.
- To address the specific barriers faced by those groups of Londoners most likely to experience financial hardship, helping them understand and access their entitlements and available support.
- To address the reasons for health inequalities that cause some groups to experience poorer physical and mental health outcomes.
- That Londoners from all walks of life feel heard and see themselves reflected in the public realm.

¹⁷ Greater London Authority (2018). Mayor's Equality, Diversity and Inclusion Strategy. Available at: [The Mayor's strategy for equality, diversity and inclusion | London City Hall](#)

¹⁸ Mayor of London (2022) The Mayor's Equality, Diversity, and Inclusion Strategy Objectives. Available at: [The Mayor's Equality, Diversity, and Inclusion Strategy Objectives \(2022\) | London City Hall](#)

connectivity, and potentially delivering more housing and job spaces than previously planned. The SPD is structured by the following themes principles:

- **Good growth:** focus on delivering socially, economically inclusive and environmentally sustainable growth contributing to Social Value;
- **Transport:** to deliver a safe, inclusive, accessible and efficient movement network comprising a diverse range of streets and walking/cycling routes to support sustainable public transport, active travel and sustainable freight transport;
- **Environment and utilities:** deliver a network of resilient, high quality and inclusive green streets and varied multi-functional green spaces that support nature recovery, access to nature, high levels of urban greening can adapt to climate change to benefit wildlife and residents and act as community focal points;
- **Housing:** deliver a variety of high-quality housing tenures, typologies, sizes and specialisms to meet the diverse range of housing needs and create sustainable lifetime inclusive neighbourhoods;
- **Employment:** delivery of new employment spaces in terms of size, typologies and costs across Old Oak to establish it as a new commercial destination; and
- **Town centre and community uses:** deliver a new major town centre for Old Oak and Park Royal serving existing and new residents, workers and visitors; and
- **Design:** building attractive, healthier, more inclusive, sustainable homes and neighbourhoods, which are vibrant, safe, comfortable, and resilient to climate change.

A key element of the SPD is its vision for coordinated and comprehensive development. This includes spatial guidance specific to Old Oak West, supporting the creation of publicly accessible open spaces and a major town centre that caters to local character and infrastructure needs. The SPD should be read alongside wider SPD's, including the draft Public Realm and Green Infrastructure (PRGI) SPD²¹ that sets out the street hierarchy. The planning document is also designed to align with multiple planning documents, including the Mayor's London Plan and local neighbourhood plans, ensuring consistency in development standards and objectives.

The SPD emphasises the importance of a mixed-use development approach to enhance employment opportunities and economic growth. It outlines principles and ambitions for delivering diverse employment spaces that cater to various sectors, leveraging excellent transport links to attract businesses and foster a vibrant commercial environment. Case studies such as Elephant Park and POP Brixton are referenced to illustrate successful models of mixed-use development that support local businesses and community interaction.

In terms of housing, the SPD advocates for a range of housing types and affordability levels to meet local and strategic needs, supported by high-quality social infrastructure. The focus on social value and inclusive economic growth is a recurring theme, aiming to provide training and employment opportunities for local residents and ensure that the benefits of development are widely shared.

The SPD also sets out the 'Place and Cluster visions' for the six places already defined in the Local Plan that are either fully or partially located within Old Oak West. This includes Willesden Junction, Old Oak Lane and Old Oak Common Lane, Channel Gate, Old Oak South, North Acton and Acton Wells.

3.4.3 Old Oak West Equity, Diversity and Inclusion (EDI) Statement 2023²²

OPDC's EDI Statement was produced alongside the SPD and provides a summary of how the SPD supports equity, diversity and inclusion. The Statement highlights that OPDC recognises the important role it has in supporting EDI, and sets out their vision "to be an organisation that identifies, prioritises, enables and champions equitable opportunities for everyone – both staff and our communities –

²¹ OPDC (2024). Draft Public Realm and Green Infrastructure SPD. Available at: [Draft Public Realm and Green Infrastructure SPD | OPDC have your say](#)

²² OPDC (2023) Old Oak West Supplementary Planning Document Equity, Diversity and Inclusion Statement. Available at: [Old Oak West Supplementary Planning Document \(SPD\) | London City Hall](#)

regardless of background, race, age, gender identity, gender expression, sexual orientation or ability and to ensure that the area's regeneration is accessible and inclusive which helps to create a more level playing field."

A key objective underpinning this vision is planning for a welcoming, accessible, and inclusive place. The Statement outlines OPDC's recognition that the built environment has a strong influence on everyday lives, and the way the built environment is shaped can affect how people experience the world.

The OPDC area is outlined as one of the most richly diverse areas in the UK, home to many different communities, ethnicities, identities and cultures, but also that areas in and around OPDC are some of the most deprived in the country. OPDC aspires to deliver high quality regeneration in the area by embedding diverse and inclusive experiences, opinions and voices into everything they do.

The EDI Statement provides a summary of how the SPD embeds content to support EDI. For example, in relation to spatial vision, the SPD focuses on sustainability and inclusion that recognises local identities and cultures to shape lifetime neighbourhoods to deliver benefits for existing and future communities. In relation to housing, the SPD provides guidance to deliver a variety of high-quality housing tenures, types, sizes and specialist housing, and to deliver at least 25% family sized homes.

3.4.4 Ealing's Draft Local Plan 2024 (Regulation 22)²³

Following a period of public consultation in line with Regulation 19, Ealing Council have submitted the Draft Local Plan in November 2024 for an independent Inspector to hold an examination into the soundness of the Plan and associated Impact Assessment and evidence (known as Regulation 22).

The Draft Local Plan document provides a comprehensive guide to the future development and growth of the borough intended to supersede the Local Plan 2012-2026. To deliver on the strategic objectives (tackling the climate crisis, fighting inequality, and creating good jobs and growth) outlined in the Local Plan 2012-2026, the Draft Local Plan outlines a series of nine priorities, including:

- **Genuinely affordable homes:** The plan includes a significant increase in affordable and council housing, empowering tenants and ensuring community ownership. Addressing the severe housing shortage, the plan aims to enhance social diversity and prevent economic polarisation, guided by the Ealing Race Equality Commission's recommendations.
- **An inclusive economy:** Promoting economic development is a core focus. The plan supports the creation of new job opportunities and the development of employment spaces. There is a particular emphasis on making Ealing a hub for creativity and industry, building on its rich heritage. The plan includes strategies to foster collaboration between local businesses and residents to stimulate job growth and economic vitality.
- **Climate action:** Ealing's Local Plan includes robust measures to promote sustainability and environmental stewardship. This includes initiatives to reduce carbon emissions, improve air quality, and encourage active travel (e.g., walking and cycling). The plan aims to make Ealing a greener borough by protecting green spaces and promoting environmentally friendly practices in new developments.
- **Thriving communities:** Ealing aims to strengthen communities by empowering volunteers, fostering community activism, and enhancing civic engagement. The borough will improve public transport connectivity and promote walking and cycling. The Local Plan integrates health considerations, emphasizing the importance of planning in reducing health inequalities and fostering community cohesion and safety.
- **Infrastructure and Services:** The Local Plan outlines the need for improved infrastructure to support growth. This includes enhancements to transportation, healthcare, education, and other essential services. The council aims to ensure that the necessary infrastructure is in place to support the expected population growth and that developments are sustainable and beneficial for all residents.

²³Ealing Council (2024) Ealing's Local Plan Final Proposals (Regulation 19). Available at: [\(Public Pack\)Agenda Document for Ealing's Draft Local Plan \(Regulation 19 Consultation Documents\)](#), 28/02/2024 00:00 (moderngov.co.uk)

3.4.5 Ealing Council Equality Objectives 2020 – 2024²⁴

Ealing Council's Equality Objectives are supported by the actions and strategic objectives outlined in the Council Plan 2022 – 2026.²⁵ The Council's Equality Objectives are as follows:

- Access to our information, services and facilities is fair and equitable for everyone;
- High levels of community cohesion are maintained;
- Gaps in outcomes for citizens are narrowed;
- A positive, diverse and inclusive workforce is ensured and promoted;
- A robust accurate evidence base of equalities information relating to the community is available and up to date;
- Equality related evidence is embedded into the decision-making process and forms an integral part of the evidence base for strategy and project development and delivery.

The Ealing Council Plan 2022-2026 outlines a comprehensive strategy focused on three strategic objectives: creating good jobs, tackling the climate crisis, and fighting inequality. The plan emphasises inclusive economic growth by aiming to create quality jobs and build genuinely affordable homes. Ealing aims to address the climate crisis by maintaining high environmental standards, enhancing green spaces, and promoting sustainable practices. The fight against inequality involves tackling issues such as race inequality, reducing crime, and ensuring the safety and well-being of all residents.

The plan sets specific priorities to achieve these objectives. To tackle inequality and crime, initiatives include significant investment in combating antisocial behaviour and supporting vulnerable populations. For climate action, the council plans to create new parks, promote active travel, and expand the school streets program. Health and well-being initiatives focus on paying care workers the London Living Wage, providing supported accommodation, and addressing health inequalities exacerbated by COVID-19.

The council is committed to ensuring a fairer start for children and young people through investments in education and youth services. Economic initiatives aim to secure thousands of new jobs and apprenticeships, as well as provide training and community hubs. Ealing's strategy also includes fostering an inclusive economy by ensuring fair salaries and expanding support for those unable to pay council tax. Ealing Council has also declared that experience of care amongst young people will be made a 'protected characteristic' in the Borough.²⁶

Housing initiatives include ending the need for temporary accommodation for families facing eviction, significant investments in new housing, and the delivery of thousands of genuinely affordable homes. Good growth is ensured by integrating good design and heritage into urban development and fostering community-led regeneration.

The plan also focuses on building thriving communities through initiatives that encourage civic engagement, support for arts and culture, and the establishment of town forums to prioritize local needs. Organizational priorities highlight the importance of efficient service delivery, transparency, and collaboration with community partners.

Ealing Council set up a Race Equality Commission in 2021 composed of 12 independent commissioners from diverse backgrounds and broadly reflecting diversity in Ealing. The purpose of this Commission is to listen to the population of Ealing and develop proposals that aim to address inequality on wellbeing and life chances.

²⁴ Ealing Council (2020) Equalities objectives. Available at: [Equalities objectives | Public sector equality duty | Ealing Council](#)

²⁵ Ealing Council (2022) Ealing Council Plan 2022 – 2026. Available at: [Council Plan 2022 \(ealing.gov.uk\)](#)

²⁶ Around Ealing (2023). Young people in care to receive protected characteristic status. Available at: [Young people in care to receive protected characteristic status - Around Ealing](#)

3.4.6 Hammersmith & Fulham Local Plan 2018²⁷

The Hammersmith & Fulham Local Plan serves as the primary framework for guiding development in the borough through to 2035. It sets out a vision and strategic objectives to manage and promote sustainable development, addressing housing, economic growth, environmental sustainability, and community well-being. Key components of the Plan include:

- **Meeting housing needs and aspirations:** Addressing the housing crisis is a critical aspect of the plan. It emphasizes the delivery of affordable housing, setting a borough-wide target of 50% affordable housing on new developments. The plan also encourages the efficient use of land and supports innovative housing solutions to meet diverse needs, including family-sized homes and specialist housing for the elderly and disabled.
- **Local economy and employment:** The plan promotes mixed-use developments that integrate commercial, residential, and leisure uses. There is a strong emphasis on supporting small and medium enterprises (SMEs) and safeguarding existing employment spaces to create a balanced and resilient economy.
- **Environmental Sustainability:** The plan promotes sustainable design and construction practices, encourages the use of renewable energy, and supports green infrastructure projects. Specific policies aim to reduce carbon emissions, improve air quality, and manage flood risks effectively.
- **Community facilities, leisure and recreation:** The Local Plan prioritizes the creation of healthy, inclusive communities. It supports the provision of high-quality healthcare, education, and community facilities. Policies aim to enhance public open spaces, improve recreational facilities, and promote active lifestyles. The plan also addresses social inequalities by promoting equitable access to services and opportunities.
- **Transport and accessibility:** The plan supports the enhancement of public transport services, development of pedestrian and cycling networks, and measures to reduce traffic congestion and pollution. It also emphasizes the importance of integrating transport planning with land use to create accessible and connected neighbourhoods.

3.4.7 Hammersmith & Fulham Equalities Plan 2021 - 2025²⁸

The Hammersmith & Fulham Equalities Plan 2021-2025 sets out the council's commitment to creating an inclusive environment where all residents feel valued and have equal access to opportunities. The plan was developed through a comprehensive consultation process with residents and staff, resulting in five key priorities:

- Ensuring everyone feels valued and has a sense of belonging;
- Removing barriers to inclusion;
- Addressing the disproportionate impact on young people;
- Improving opportunities for all; and
- Becoming an employer of choice that fosters greater inclusion.

The plan outlines several strategic actions to promote inclusion and equality across various sectors, such as education, employment, and community services. For example, initiatives include targeted support for young people at risk of exploitation or gang involvement, enhancing access to services for individuals with disabilities, and promoting diversity within the council's workforce. The council also aims to engage with the local community through various forums and feedback mechanisms to ensure that its initiatives are responsive to the needs and concerns of all residents.

²⁷ Hammersmith & Fulham Council (2018) Hammersmith & Fulham Local Plan 2018. Available at: [local_plan_2018_web_version.pdf \(lbhf.gov.uk\)](https://www.lbhf.gov.uk/local-plan-2018-web-version.pdf)

²⁸ Hammersmith & Fulham Council (2021) Our Equalities Plan means business 2021 – 2025. Available at: [Equalities Plan 2021-25 \(lbhf.gov.uk\)](https://www.lbhf.gov.uk/equalities-plan-2021-25)

In addition to these priorities, the plan includes measures to track the impact of its initiatives and ensure accountability. Regular reviews and updates will be conducted to assess progress and make necessary adjustments. The council's overarching vision is to make Hammersmith & Fulham the most inclusive borough in the country, where every resident has the opportunity to thrive and contribute to the community.

3.4.8 Brent Local Plan 2019-2041²⁹

The Brent Local Plan aims to guide development in Brent up to 2041. It outlines the council's vision and strategic objectives to manage growth while addressing housing, economic development, and environmental sustainability. The plan is framed around several key themes, including:

- **Housing:** The plan aims to meet the borough's housing needs by delivering approximately 27,482 new homes by 2041. This includes affordable housing, ensuring a mix of tenures and sizes to accommodate various needs. Policies are in place to promote the efficient use of land, such as increasing density in suitable areas and redeveloping underused sites.
- **Economy & town centres:** Brent's economic strategy focuses on enhancing its town centres and industrial areas. The plan supports the creation of new jobs, particularly in growth sectors such as technology, media, and creative industries. It also aims to maintain a supply of employment land and improve local skills through partnerships with educational institutions.
- **Sustainable infrastructure:** The plan emphasises sustainability, aiming to reduce carbon emissions and promote green infrastructure. Policies include enhancing public transport, supporting active travel (walking and cycling), and improving energy efficiency in new developments. The plan also addresses flood risk management and the protection of green spaces and biodiversity.
- **Social infrastructure:** Ensuring adequate infrastructure to support growth is a priority. This includes investments in healthcare, education, and community facilities. The plan supports the creation of vibrant, inclusive communities with accessible amenities and public spaces.
- **Heritage and culture:** Promotes high-quality design that respects the borough's diverse character and heritage. It includes guidelines to ensure new developments enhance local distinctiveness and contribute positively to the public realm. Conservation of historic assets and their integration into new developments is also a key focus.
- **Transport:** The plan supports improvements to public transport, the development of cycling and walking routes, and measures to reduce car dependency whilst improving connectivity within the borough and to the wider London area. This includes collaborating with Transport for London (TfL) and other stakeholders to improve transport infrastructure.

3.4.9 Brent's Equality, Diversity and Inclusion Strategy 2024 - 2028³⁰

Brent's Equity, Diversity, and Inclusion (EDI) Strategy for 2024-2028 sets out Brent Council's commitment to fostering a fair and inclusive borough. The strategy is driven by a vision of creating a community where diversity is celebrated, and all residents have equal opportunities to thrive. It outlines the council's approach to addressing systemic inequalities and promoting social cohesion through targeted actions. The strategy includes specific objectives such as improving workforce diversity, ensuring inclusive service provision, and enhancing community engagement.

A key component of the strategy is the focus on anti-racism. The council commits to actively challenging racism and discrimination in all its forms, both within the organization and across the community.

The strategy also addresses the importance of data and evidence in driving EDI initiatives. The council plans to use data to identify gaps and monitor progress, ensuring that actions are based on robust evidence. Community engagement is another crucial aspect, with the strategy outlining plans to involve residents and stakeholders in the development and implementation of EDI initiatives. This

²⁹ Brent Council (2022) Brent Local Plan 2019-2041. Available at: [Brent Local Plan \(adopted 2022\) | Brent Council](#)

³⁰ Brent Council (2024) Equity, Diversity and Inclusion Strategy 2024 – 2028. Available at: [brent-equity-diversity-and-inclusion-strategy-2024-28-digital-version-v2.pdf](#)

participatory approach aims to ensure that the voices of marginalised and underrepresented groups are heard and considered in decision-making processes.

Furthermore, the strategy recognises the impact of socio-economic inequalities and aims to address these through targeted support and interventions. By focusing on areas such as employment, education, health, and housing, the council seeks to create a more equitable environment where all residents can achieve their potential.

3.5 Wider Local Policy (i.e. housing, jobs and skills)

The local policies summarised in **Section 3.4** is not an exhaustive list. The surrounding Boroughs of Ealing, Hammersmith and Fulham and Brent have wider local policies relevant to this EqlA, including:

Ealing Borough

- **Great Homes, Better Lives: Our Housing Strategy for Ealing 2024-2029 (Draft)**³¹: the strategy aims to provide genuinely affordable, high-quality homes, improve health and wellbeing, and support diverse housing needs across Ealing. The Council commits to delivering 4,000 new genuinely affordable homes.
- **Ealing's Jobs and Skills Strategy 2024-2029**³²: the strategy aim to create a dynamic and inclusive economy by focusing on high-growth sectors and ensuring a suitably skilled local workforce. The Council seek to address challenges such as cost of living, housing and the impact of COVID-19.
- **Ealing's Strategic Ask**: Ealing Council is also considering a Strategic Ask for regeneration, investment and jobs at Old Oak Park Royal as part of an ongoing engagement process with OPDC. This Strategic Ask aims to support a partnership between Ealing Council and OPDC to deliver the best outcomes for Ealing residents and businesses. OPDC and Ealing Council are undertaking early stage discussions of this Strategic Ask and future regeneration in Old Oak should acknowledge the objectives and deliverables within where appropriate.

London Borough of Hammersmith and Fulham

- **London Borough of Hammersmith and Fulham Housing Strategy 2021-2026**³³: the strategy aims to provide safe, affordable, and sustainable housing that enhances residents' health, wellbeing and access to opportunities. The Council commits to building at least 1,500 genuinely affordable homes, including larger homes for families, involving residents in the decision-making process.

Borough of Brent

- **Brent Council Workforce Strategy 2023-2025**³⁴: the strategy identified key priorities to support and develop a diverse workforce, including: workforce planning, workforce insight and experience, workforce growth and development and ways of working.

3.6 Summary of key priorities

Table 3-1 below presents a summary of OPDC's and the three boroughs of Brent, Ealing, and Hammersmith and Fulham equality priorities and considerations in relation to the key regeneration and equality themes presented under **Section 4.3**.

³¹ Ealing (2024). Great homes, better lives: Our housing strategy for Ealing. Consultation Draft April 2024. Available at: [Housing Strategy for Ealing's Residents](#)

³² Ealing (2024). Ealing's Jobs and Skills Strategy 2024-2029. Available at: [Ealing's Jobs and Skills Strategy](#)

³³ Hammersmith and Fulham (2021). Housing strategy 2021 to 2026. Available at: [Housing strategy 2021 to 2026 | London Borough of Hammersmith & Fulham](#)

³⁴ [Decision - Workforce Strategy](#)

Table 3-1: Equality priorities

Themes	Priorities			
	Brent	Ealing	Hammersmith & Fulham	OPDC
Housing	<ul style="list-style-type: none"> Deliver housing and create mixed, inclusive communities with at least 25% of new homes being family-sized (3 bedrooms or more). The council targets 50% of new homes to be affordable. To meet housing needs up to 2041, approve developments in Growth Areas and plan for future needs. Address gypsy and traveller needs by retaining and expanding existing sites. 	<ul style="list-style-type: none"> Meet the goal of 21,570 new homes from 2019-20 to 2028-29. Create diverse, inclusive communities with a variety of housing options. Focus on increasing affordable homes, especially social rent. Support local housing projects and Community Land Trusts with resident involvement. Address housing access issues that limit population growth and cause the outflow of working-age residents. 	<ul style="list-style-type: none"> Aim for 50% of new homes to be affordable, of which 60% should be for social rent and 40% for intermediate rent. Reduce high turnover in build-to-rent schemes which affect community cohesion. Convert smaller terraced houses into family homes, trying to avoid areas near busy roads. 	<ul style="list-style-type: none"> Aim for 50% of new homes within the OPDC area to be affordable, of which 60% should be for social rent or London Affordable Rent. Aim for over 25% family housing, prioritising ground or first floor with garden access, close to parks and social infrastructure. For higher-level family housing, ensure convenient access to secure private or communal open spaces suitable for children. Include co-living, shared housing, and student accommodation. Safeguard the existing Bashley Road Gypsy and Travellers Site and work positively with London Borough of Ealing to enhance the site where required.
Employment, skills, and training	<ul style="list-style-type: none"> Ensure economic growth and jobs are accessible to everyone. Large developments (5,000 sqm or more, or 50+ homes) must include an Employment, Apprenticeship, and Training Plan. Local Employment Sites are crucial for providing diverse job premises. 	<ul style="list-style-type: none"> Provide affordable workspaces that support social and economic goals, helping small and medium businesses start up. In North Acton, create a construction skills centre to match local job opportunities with construction activity. 	<ul style="list-style-type: none"> Support new and existing employment uses and their improvement. Ensure land and buildings remain available for employment or local services. Support local training and apprenticeships, particularly in major developments. 	<ul style="list-style-type: none"> Create jobs, offer local training, and build an inclusive economy. Break down barriers to under-represented groups in the labour market Support minority-led businesses and SMEs to thrive Develop small, affordable, and shared workspaces in Old Oak to support local businesses.

Themes	Priorities			
	Brent	Ealing	Hammersmith & Fulham	OPDC
			<ul style="list-style-type: none"> Encourage local businesses to adopt the London Living Wage. 	<ul style="list-style-type: none"> Drive the highest standards of fair employment, D&I and pay (LLW minimum)
Neighbourhood and community	<ul style="list-style-type: none"> Protect social infrastructure unless it is proven unnecessary, replaced with better facilities, or part of an agreed redevelopment plan. New or improved social infrastructure should be easily accessible by public transport, walking, or cycling. Resist the loss of pubs as they are important community assets. Avoid clustering by ensuring adult gaming centres, pawnbrokers, betting shops, and takeaways will not be close to each other. 	<ul style="list-style-type: none"> Enhance and adapt social infrastructure to better serve Ealing's growing population. Ensure new development includes necessary social infrastructure and does not harm existing facilities. Protect and improve community facilities to strengthen communities and boost social integration and pride. 	<ul style="list-style-type: none"> Community uses should meet local needs, minimise environmental impact, and be accessible to all. Protect and enhance parks, open spaces, and biodiversity. Improve and expand school options. Enhance leisure, sports, arts, and cultural facilities, protect existing ones, and support new developments, including major facilities in White City and riverside areas. 	<ul style="list-style-type: none"> Ensure coordinated development of future town centre uses, including cultural and temporary uses to create a Cultural Quarter. Provide day and night activities in Old Oak and North Acton town centres. Community hubs that support diverse local needs, including youth, elderly, and faith groups. Along Grand Union Canal, create activities for enjoyment and safety day and night. Deliver social infrastructure.
Health and wellbeing	<ul style="list-style-type: none"> Protect and retain social infrastructure and associated health services. Address poor air quality which currently has a negative effect on the health of Brent's residents. 	<ul style="list-style-type: none"> Provide more physical, social, and green infrastructure like health facilities, schools, sports amenities, transport, utilities, and community spaces. Mitigate housing issues that are limiting population growth and causing the outflow of working-age residents. 	<ul style="list-style-type: none"> Improve borough-wide healthcare. Integrate health and social care, tackle childhood obesity, improve access to Sheltered Housing, enhance mental health services, provide better sexual health services for at-risk communities. 	<ul style="list-style-type: none"> Create a zero-carbon urban quarter in Old Oak West. Design green streets to be fully accessible. Develop green streets connecting public spaces that promote health and wellbeing. High quality public spaces, with features like social spaces, local food growing, sports areas.

Themes	Priorities			
	Brent	Ealing	Hammersmith & Fulham	OPDC
Transport infrastructure and connectivity	<ul style="list-style-type: none"> • Prioritise active and sustainable travel over private motor vehicles. • Support and design active travel schemes to meet the healthy streets principles and provide access for all. • Increase coverage of electric vehicle charging points. • Prioritise car free development. 	<ul style="list-style-type: none"> • Collaborate with OPDC to improve connections between North Acton and the rest of Acton. • Enhance pedestrian and cyclist routes across the A40. • Prioritise better pedestrian crossings across major roads at key points. 	<ul style="list-style-type: none"> • Improve transport, accessibility, and air quality by enhancing cycling, walking, and public transport. • Provide accessible off-street parking for Blue Badge holders. • Transport Assessments are required with planning applications for developments with significant transport impact. 	<ul style="list-style-type: none"> • Create a safe, inclusive, and efficient active travel network. • Use Legible London and artwork-based signs for wayfinding. • Design a high-quality cycling network with dedicated routes. • New and improved bus routes. • Make Old Oak Common Station accessible 24-hour routes integrated into the broader network.

4. Evidence review

4.1 Introduction

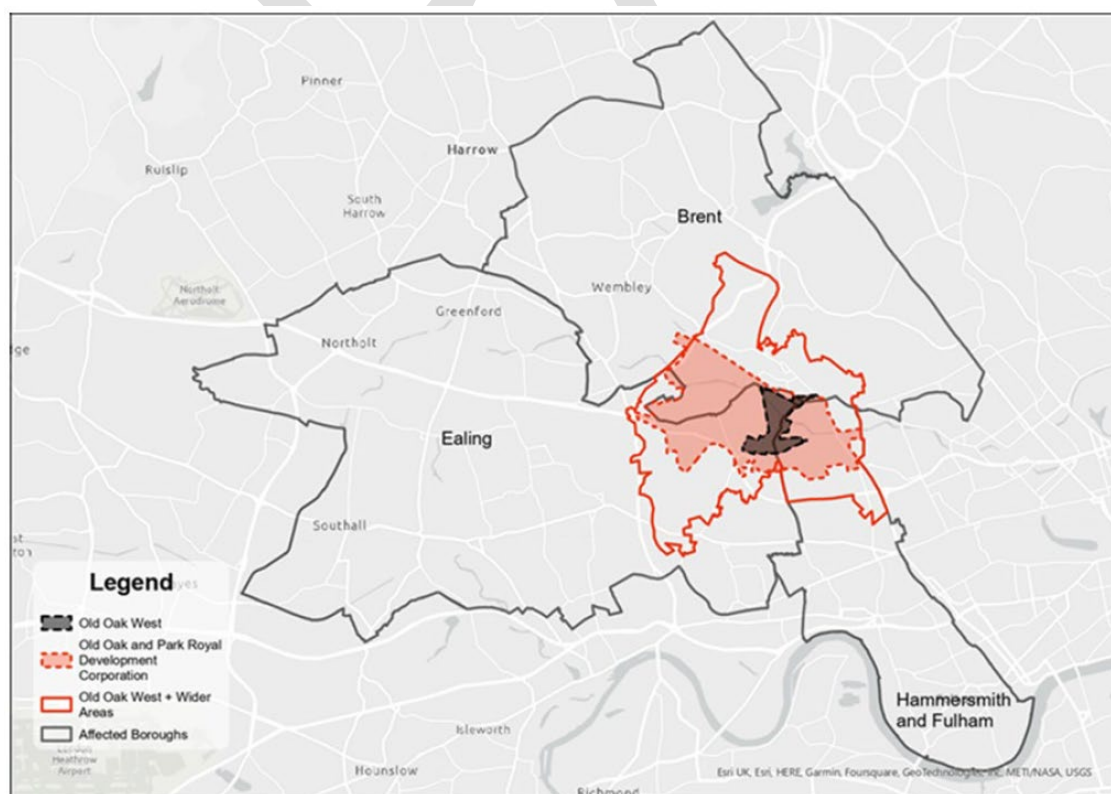
This section provides an overview of the baseline and evidence with regards to equalities. This includes key population statistics, drawing on relevant data from the EqlA baseline completed by Arup in February 2023 (see **Appendix C**), and OPDC's Supplementary Planning Document. The evidence review also presents key evidence and issues informed by the review of wider baselines and documents, notably the Old Oak and Park Royal Socio-economic baseline and Old Oak Community Engagement Summary Report, and other relevant sources deemed suitable to support the evidence provided in relation to key themes and issues.

4.2 Equalities baseline

For consistency, the same geographical areas have been used in this evidence review as used in the EqlA baseline completed by Arup. These are as follows:

- Old Oak West (Old Oak): This is the Old Oak development and regeneration area.
- Old Oak and Park Royal Development Corporation (OPDC) area: This comprises the areas within the OPDC boundary as set out in the OPDC Local Plan.
- Old Oak + wider areas: This comprises Old Oak plus the neighbouring areas of Harlesden and Willesden Junction, Park Royal, Old Oak, and Scrubs Lane and North Acton.
- The geographical boundaries of Brent, Ealing, and Hammersmith & Fulham Boroughs (referred to collectively as the three boroughs) that intersect with the Old Oak regeneration area.
- London and England have also been used for regional and national comparison.

Figure 4-1: Geographical area boundaries



Source: Arup Old Oak West EqlA Baseline (2023)

In summary, the key issues relating to equalities are:

- The population growth rate of Old Oak (14.6%) is significant- and greater than that of London (7.3%) and England (6.4%) between 2011 and 2021.
- In Ealing by 2041, the largest population growth will be seen in the 75–79-year-old age group which is expected to grow by 41%.³⁵ In Brent, the number of residents aged over 65 could increase by 78% between 2020 and 2041.³⁶ In Hammersmith & Fulham, the population aged over 65 is predicted to increase by 36% by 2033.³⁷
- Old Oak has a notably higher proportion of young people aged 16-24 (17.5%) than the surrounding geographies.
- Compared to surrounding areas, Old Oak has a lower proportion of residents reporting they have a disability that limits their day-to-day activities (12.6%).
- Christianity is the most widely observed religion across all geographies. Islam is the second most prevalent religion with 17.7% of Old Oak's residents being Muslim.
- Approximately 60% of residents in Old Oak and OPDC area have a minority ethnic background, compared to London (46.2%) and England (19.0%). In Old Oak, Black, Black British, Black Welsh, Caribbean or African residents make up the largest minority group at 23.1%.
- While Gypsy or Irish Travellers represent only 0.3% of the Old Oak population, Bashley Road Travellers Site containing 24 pitches is located just outside the Old Oak boundary.³⁸
- There is a higher birth rate within the three boroughs compared to London and England. Brent had the highest live births per 1,000 residents, at 14.1.
- Old Oak and the OPDC area have slightly higher proportions of residents identifying as a different sex than the sex registered at birth (1.5% and 1.3% respectively) in comparison to London and National figures.
- Old Oak has a higher proportion of gay, lesbian, bisexual, and all other sexual orientations compared to London and national rates at 5%.
- Old Oak has a higher proportion of residents who have never been married or in a registered civil partnership (59.5%) compared with rates for local boroughs, London and England

4.3 Key evidence and issues: Regeneration and Equality

This section provides information on key evidence and issues relevant to regeneration and equality groups. It is informed by the Arup equalities baseline, planning documents from OPDC, as well as wider datasets and literature pertinent to equalities in the context of regeneration. Evidence is focused on the Old Oak area and three boroughs where possible. However, due to availability of information London-wide data is used as a proxy in some instances. Comparison to national information has been used where appropriate to illustrate certain points.

Throughout the key evidence and issues section, varying geographical levels are considered dependent on publicly available data. These include:

³⁵ Ealing Council (2021) Ealing JSNA 2021: Population Characteristics. Available at: [JSNA 2021 Population Characteristics - May 2022 \(ealing.gov.uk\)](https://ealing.gov.uk/jsna-2021-population-characteristics)

³⁶ Brent Council (2021) Borough Plan 2023 – 27 Evidence Pack. Available at: [9b. Appendix B - 2023-27 Borough Plan Evidence Pack.pdf \(brent.gov.uk\)](https://brent.gov.uk/borough-plan-2023-27-evidence-pack)

³⁷ Hammersmith & Fulham Council (2023) Older People's Needs Assessment 2023. Available at: [Older people's needs assessment 2023 H&F \(lbhf.gov.uk\)](https://lbhf.gov.uk/older-peoples-needs-assessment-2023)

³⁸ Ealing Council (2023) Additional site allocations for gypsy and traveller pitch provision: Summary report. Available at: [Additional site allocations for gypsy and traveller pitch provision: Summary report | Additional site allocations for gypsy and traveller pitch provision: Summary report | Ealing Council](https://ealing.gov.uk/additional-site-allocations-for-gypsy-and-traveller-pitch-provision-summary-report)

- East Acton Ward: Ward layout before 2022 encompassing the Old Oak area to the west of Old Oak Common Lane up to Willesden Junction and beyond North Acton station. Ealing has had new ward layouts since 2022.
- North Acton Middle-Super Output Area (MSOA)³⁹: MSOA layout used in the 2021 Census encompassing the Old Oak area to the west of Old Oak Common Lane up to Willesden Junction and beyond North Acton station
- Brent, Ealing and Hammersmith and Fulham Boroughs: the geographical boundaries of the three boroughs that intersect with the Old Oak regeneration area.
- London has been used to provide regional level statistics and comparison points.

4.3.1 Housing

Table 4-1 provides a breakdown of housing tenures within each of the three boroughs as well as housing waiting list figures. As is the case with other London boroughs, the three boroughs have a shortage of affordable social housing. The following sections explore the key evidence and issues for these geographical areas, alongside Old Oak.

Table 4-1: Existing housing tenure split and housing waiting list in the three boroughs

	Ealing ⁴⁰	Brent ⁴¹	Hammersmith and Fulham ⁴²
Owned	46.2%	38.0%	32.1%
Shared Ownership	2.0%	2.0%	1.5%
Private rented sector housing	34.0%	36.0%	36.4%
Social rented housing	17.5%	24.0%	29.8%
Total number of households on housing waiting lists	>7,500 applications ⁴³	>32,000 people	3,000 people ⁴⁴

Borough of Ealing

As **Table 4-1** highlights, there are currently over 7,500 applications on the council housing register in Ealing with 200-250 new applications being received each month. A demographic breakdown of residents on the housing waiting list was not available for this EqIA.

Affordability of private sector housing is a major issue in Ealing and is an issue most acute for families needing larger (over 3 bedroom) properties.⁴⁵ Ealing's Local Housing Needs Assessment identifies there is a target of 6,120 new dwellings in the area covered by OPDC in Ealing, and that across the borough there is an existing net affordable housing need of 7,365 households, as well as a future (2021 - 2041) affordable housing need of 5,062 households.⁴⁶

Certain protected characteristic groups in Ealing are disproportionately impacted by the demand for housing. Ealing's older population is forecasted to grow significantly in line with trends across London

³⁹ ONS (2021) Statistical geographies. "Middle layer Super Output Areas (MSOAs) are made up of groups of Lower layer Super Output Areas (LSOAs), usually four or five. They comprise between 2,000 and 6,000 households and have a usually resident population between 5,000 and 15,000 persons. MSOAs fit within local authorities." Available at: [Statistical geographies - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/statistical-geographies)

⁴⁰ ONS (2021). Census 2021: TS054 Tenure. Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics](https://nomis.com/nomis/official-census-and-labour-market-statistics/tenure)

⁴¹ Information provided by Brent Council October 2024.

⁴² ONS (2021). Census 2021: TS054 Tenure. Available at: [Nomis - Official Census and Labour Market Statistics - Nomis - Official Census and Labour Market Statistics](https://nomis.com/nomis/official-census-and-labour-market-statistics/tenure)

⁴³ Ealing Council (2024) Ealing's housing register. Available at: [Ealing's housing register | Applying for a council home](https://ealing.gov.uk/housing-register)

⁴⁴ Hammersmith & Fulham (2024) The housing register. Available at: [The housing register Borough of Hammersmith & Fulham](https://hammersmithfulham.gov.uk/housing-register)

⁴⁵ Ealing Council (2019) Private Sector Housing Strategy. Available at: [Ealing Private Sector Housing Strategy 2014-19](https://ealing.gov.uk/private-sector-housing-strategy)

⁴⁶ Opinion Research Services (2022) Ealing Local Housing Needs Assessment Update. Available at: [Ealing Local Housing Needs Assessment Update](https://ealing.gov.uk/local-housing-needs-assessment-update)

and therefore the demand for specialist units for older people will also grow. To meet this demand Ealing intends to follow the precedent set by other boroughs, and in line with targets established in the London Plan, deliver 200 specialist older persons units per year for Ealing's plan period 2021 to 2041. Older people can find it more difficult to rehouse due to reasons such as financial constraints and physical challenges posed by age and increased chance of experiencing a disability. Older people may also be more reluctant to move if they have lived in the same house for a long time and are a long-standing member of a particular community or area.

The number of young people aged 25-34 is also projected to grow by 4,200 between 2021 and 2041 in Ealing. However, the number of single person households aged 25-34 years is projected to fall by 1,340 over the same period. This decline in young adult single households, contrastingly to the growing population, is due to an increasing number of young adults not forming their own households but instead sharing properties with other young adults. This is due to pressures for social housing and rising private rents. This trend, coupled with a growing number of multi-generational households, is expected to increase the demand for larger homes in Ealing, even though the number of families with children is projected to grow at a low rate (by 500) between 2021 and 2041. In Ealing, non-white households are disproportionately represented in multi-generational living arrangements, where they are also more likely to face the intersecting issue of overcrowding.

Borough of Brent

In Brent there are over 32,000 people on the social housing waiting list with the council receiving 2,000 new housing applications every year. **Table 4-2** below shows the demographic breakdown of the waiting list by age, disability and ethnic group. This data reveals a disproportionate representation of those aged 30-45 years (44.0%) and ethnic minority groups, especially Black or Black British (31.6%). A more detailed breakdown provided by the Council revealed that the largest ethnic minority group is African comprising 16.4% of the waitlist, followed by Caribbean (12.4%).

Table 4-2: Demographic breakdown of social housing waitlist in the Borough of Brent⁴⁷

Protected characteristic group		Percentage of social housing waitlist
Age	16-29	11.0%
	30-45	44.0%
	46-59	31.0%
	60+	14.0%
Disability: those who confirmed 'I have a disability' on Locata application form		12.0%
Ethnic group	White	20.4%
	Asian, Asian British or Asian Welsh	15.3%
	Black, Black British, Black Welsh, Caribbean or African	31.6%
	Mixed or Multiple ethnic groups	4.0%
	Other ethnic group	6.0%
	Not stated	22.6%

Brent Council also provided the average waiting times for priority band A-C on the housing waiting list, summarised in **Table 4-3** below. Generally, larger properties such as 3-bed, 4-bed, and 5-bed homes have significantly longer waiting times, especially for lower priority bands (B and C), with waits extending up to 16 years. In contrast, smaller units like studio flats and 1-bed accommodations have shorter waiting periods, particularly for higher priority bands (A and B), ranging from 5 months to 13

⁴⁷ Information provided by Brent Council October 2024. Page 222

months. Sheltered accommodation shows a more moderate waiting time across all priority bands, with a maximum of 33 months for priority C.

Table 4-3: Average waiting times for social housing for priority bands A-C in Brent⁴⁸

Type/ Size	Priority band A: emergency need to move	Priority band B: urgent need to move	Priority band C: reasonable preference
Sheltered Accommodation	19 months	25 months	33 months
Studio flat	5 months	7 months	5 years
1-bed	11 months	13 months	3 years
2-bed	9-18 months	22-24 months	7-10 years
3-bed	16-19 months	3-4 years	12-16 years
4-bed	17 months	5 years	16 years
5-bed	19 months	3 years	16 years

Lack of housing, in particular affordable housing is also a significant issue in Brent. The Local Plan highlights the borough has a need for 48,000 additional homes between 2016 – 2041, of which 19,448 should be affordable. Of the affordable need, 85% is projected to be required in the form of social rent (council house type rents) and 10% for London Living Rent.

Changing demand for different house sizes and tenures will have disproportionate impacts on certain protected characteristic groups. Brent requires the majority, 53.8%, of new homes to be family size dwellings (3 bedrooms or more) yet the borough is expecting to see a drop in the number of couples with children between 2019 and 2041. The demand for family size dwellings, similarly to Ealing, is therefore expected to be driven by a growth in the number of young adults sharing households, as well as multi-generational houses. Currently, there are 1,400 specialist dwellings for older people in the borough (excluding nursing homes). Similarly to trends across London, there is expected to be significant growth in the number of older people in Brent between 2019 and 2041, and consequently an additional 4,400 specialist older people's houses are anticipated to be required.

London Borough of Hammersmith & Fulham

As **Table 4-1** highlights, Hammersmith & Fulham has a slightly different spread of housing tenures compared to Ealing and Brent in terms of having a greater existing proportion of social housing that is comparable to the share of private rented housing. However, there are still around 3,000 people waiting for housing in Hammersmith & Fulham. A demographic breakdown of residents on the housing waiting list was not available for this EqIA.

The waiting times for different housing types and priority bands vary significantly, as shown in **Table 4-4** below. For sheltered accommodation, the wait ranges from 12-14 months for those with an urgent need to move, to up to 26 months for those with a general housing need. Studio flats or 1-bed units have shorter waits, generally between 11-16 months across all priority bands. While the wait for 4-bed or larger homes is notably longer than other sizes, at 32-70 months for those qualifying for the Community Contribution priority scheme⁴⁹ and 50-70 months for general housing needs.

Further, LBHF reveal that only 6% of successful housing applicants are identified as people with an urgent need to move (band 1) and the largest proportion of applicant are people with housing need that have provided evidence of making a community contribution (band 2). While 45% as assigned the lowest priority need (band 3).

⁴⁸ Information provided by Brent Council October 2024.

⁴⁹ The Community Contribution priority scheme is a Hammersmith & Fulham Council policy which gives a qualifying applicant increased priority for housing. Criteria includes working households, volunteers, those in education or training, ex armed forces personnel, registered foster carers, adopters and special guardians. Disabled people and young people are subject to special conditions. https://www.lbhf.gov.uk/sites/default/files/section_attachments/hf_housing_allocation_scheme_2021.pdf

Table 4-4: Average waiting times for social housing for priority bands 1-3 in LBHF⁵⁰

Type/ Size	Priority band 1: urgent need to move	Priority band 2: made community contribution	Priority band 3: housing need
Sheltered Accommodation	12-14 months	11-32 months	15-26 months
Studio flat or 1-bed	11-13 months	11-15 months	11-16 months
2-bed	12-16 months	18-44 months	38-50 months
3-bed	36-70 months	22-60 months	50-67 months
4-bed or more	N/A	32-70 months	50-70 months

Similar to the other boroughs, Hammersmith & Fulham has established targets to deliver more affordable housing, and housing that meets the needs of different protected characteristic groups; Hammersmith & Fulham's Housing Strategy 2021 - 2026⁵¹ commits to building at least 1,500 genuinely affordable homes, prioritising larger flats and homes for families. The Local Plan's target for 2018 – 2035 is for 50% of all dwellings in the borough to be affordable, and of these 60% should be social rents.

Hammersmith & Fulham's population aged over 65 is expected to increase by 58% by 2035, and the population aged over 85 is expected to double. To support the growth in these age groups more wheelchair accessible and wheelchair adaptable housing across all tenures is needed, as currently a fifth of older people live in council owned 'general needs' accommodation with nearly half having no ground floor entrance and many having no lift access. The council also recognises the need to meet the needs of people who need additional care and support through special needs housing, such as extra care housing, housing for people with learning disabilities and nursing homes, sheltered housing and residential care homes with on-site home and medical care.

Old Oak regeneration area

The Arup Baseline highlights that although the average house price in Old Oak (£467,500) is lower than London (£533,531), the affordability ratio is higher (14.3 compared to 13.7). The affordability ratio is calculated as the amount of a household's income they could typically expect to spend on purchasing a home. Data from the Office for National Statistics on private housing rent at local authority level shows Hammersmith & Fulham had the highest average monthly rent as of June 2024 at £2,530 and Ealing the lowest at £1,825.⁵²

These current costs, along with anticipated future increases, significantly contribute to poverty in London, disproportionately affecting certain protected characteristic groups who are more likely to experience housing-driven poverty. For example, 39% of Londoners from Black, Asian and Minority Ethnic (BAME) backgrounds live in relative poverty after housing costs (such as rent, mortgage payments, home insurance, council tax⁵³) compared to 21% of White Londoners.⁵⁴ Recent studies highlight that the effects of housing poverty are made worse by the issue of new developments in London failing to meet required affordable housing quotas.⁵⁵ This shortfall not only perpetuates housing poverty but also widens the gap in access to affordable housing, disproportionately affecting minority communities.

⁵⁰ London Borough of Hammersmith and Fulham (no date). The Housing Register: Waiting times. Available at: [Waiting times | London Borough of Hammersmith & Fulham](#)

⁵¹ Hammersmith & Fulham (2021) Housing strategy 2021 to 2026. Available at: [Housing strategy 2021 to 2026 | London Borough of Hammersmith & Fulham \(lbhf.gov.uk\)](#)

⁵² ONS (2024) Price Index of Private Rents, UK: monthly price statistics. Available at: [Price Index of Private Rents, UK: monthly price statistics - Office for National Statistics \(ons.gov.uk\)](#)

⁵³ Trust for London (2023) Poverty before and after housing costs. Available at: [Poverty before and after housing costs](#)

⁵⁴ Mayor of London (2020) Homes for Londoners: Affordable Homes Programme 2021-2026. Available at: https://www.london.gov.uk/sites/default/files/homes_for_londoners_-_affordable_homes_programme_2021-2026_-_equality_impact_assessment.pdf

⁵⁵ Almeida, A (2021) Pushed to the Margins. A Quantitative Analysis of Gentrification in London in the 2010s. Available at: [london.gov.uk/sites/default/files/homes_for_londoners_-_affordable_homes_programme_2021-2026_-_equality_impact_assessment.pdf](https://www.london.gov.uk/sites/default/files/homes_for_londoners_-_affordable_homes_programme_2021-2026_-_equality_impact_assessment.pdf)

4.3.2 Employment, growth, skills and training

Old Oak experiences greater levels of deprivation than comparative geographies, in particular relating to employment and income. The Arup Baseline reveals that Old Oak has high levels of deprivation with over 80% of the Lower Super Output Areas (LSOAs)⁵⁶ in the area being in the top 10% most deprived nationally overall. The employment domain of the Indices of Deprivation (IoD) 2019⁵⁷ measures the working age population in an area which has been involuntarily excluded from the labour market. In Old Oak half of the LSOAs are within the 10% most deprived nationally in this domain. The income domain of the IMD measures deprivation relating to low income (including those out of work). In Old Oak, more than 60% of the LSOAs are within the most 10% most deprived nationally in this domain.

In relation to economic activity, Old Oak has a lower level of economically active residents (62%) compared to the three boroughs (66.1%) and London (66.2%). Old Oak also has significantly higher levels of unemployment (7.1%) compared to the three boroughs (4.9%), London (4.8%) and England (3.5%). The Socio-Economic Baseline Study for OPDC, informed by the 2011 Census, is useful in revealing intersectionality of certain protected characteristic groups and socio-economic issues.⁵⁸

Table 4-5 below provides an illustrative overview on economic activity and unemployment in the OPDC area compared to London in relation to certain age and ethnic groups.

Table 4-5: Socio-economic issues relating to age and ethnicity

Socio-economic theme	Comment
Economic activity rates by age	The rates of economic activity are lowest in the 45–54-year-old age group (7.7% lower than London) followed by the 35–44 age group (6.4% lower than London).
Economic activity rates by ethnicity	Economic activity is lowest in the OPDC area for the Black/African/Caribbean (58.8%) and Other ethnic groups (49.3%), compared to White, Mixed, or Asian ethnic groups (which range between 68.2% and 69.7%).
Unemployment rates by age	The greatest disparity in unemployment between the OPDC area and London is also in the 45–54 and 35–44 age groups (4.7% and 4.9% higher than London respectively), although the unemployment rate in the OPDC area is highest amongst the 16–24-year-olds (25.7%)
Unemployment rates by ethnicity	Unemployment is highest for the Black/African/Caribbean ethnic group in the OPDC area (22.2%), compared to London (17.7%).

4.3.3 Neighbourhood and Community

Community safety

The Socio-Economic Baseline Study highlights the OPDC Area had a significantly higher crime rate per 1000 people in 2014/15, at 120 compared to 80 across London. Crime rates have lowered in recent years, however analysis of Metropolitan Police and Census 2021 data highlights there is still a disparity between OPDC and London – in 2021 the OPDC area had a crime rate of 85 per 1,000 residents, compared to 75 in London.⁵⁹ Further, the Old Oak West Community Engagement Summary Report supports these statistics, setting out people's perception of the local area. In

⁵⁶ ONS (2023) Lower layer Super Output Areas (LSOAs) are made up of groups of Output Areas (OAs), usually four or five. They comprise between 400 and 1,200 households and have a usually resident population between 1,000 and 3,000 persons. Available at: [Area type definitions Census 2021 - Office for National Statistics](#)

⁵⁷ Ministry of Housing, Communities & Local Government (2018 to 2021) The English indices of deprivation 2019 provide statistics on relative deprivation in small areas in England. Available at: [English indices of deprivation 2019 - GOV.UK](#)

⁵⁸ Van Lohuizen, A (2016) Socio-economic baseline – Old Oak and Park Royal. Available at: [41. socio-economic baseline study 0.pdf \(london.gov.uk\)](#)

⁵⁹ Metropolitan Police (2024) MPS LSOA Level Crime (Historical) 01/042010 to 31/01/2022. Available at: [Recorded Crime: Geographic Breakdown - London Datastore; and](#) ONS (2021) Census 2021: TS001 – Number of usual residents in households and communal establishments. OPDC LSOAs; London Region. Available at: [Dataset Selection - Query - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](#)

particular, when asked to describe their perception of the non-physical environment local residents used terms such as 'unsafe', 'hostile', and 'dangerous'.⁶⁰

Evidence also highlights that high crime rates in London disproportionately impact individuals from ethnic minority backgrounds, particularly people from Black communities. In the year ending March 2022, the rate of stop and searches for Black residents in London was 40.5 per 1000, compared to 14.1 for Asian residents, and 14.0 for White residents.⁶¹ The rate of arrests between April 2021 and March 2022 was also higher for ethnic minorities in London, at 13.3 per 1000 compared to 9.6 per 1000 for people from White ethnic groups. These figures may hold particular relevance for Old Oak given the ethnically diverse nature of the local community and significant representation of people from Black ethnic groups. Furthermore, evidence highlights that young black people (aged 0-24) are significantly more likely to be victims of knife crime and homicide in London, and that living environment deprivation is a key predictor of which areas have the highest rates of victimisation.⁶² Several of the LSOAs covering the Old Oak area, particularly in the north towards Willesden Junction and Harlesden, rank in the 10% most deprived in the living environment domain of the IoD.

Community resources and open spaces

Old Oak is currently home to a number of community facilities as follows:

- Nadi Park Royal community centre on Old Oak Common Lane provides facilities for wedding and charity functions as well as gym services. The site familiarisation visit and online searches have identified that it is likely Nadi Park Royal also acts as a social and religious hub for the local Muslim community;
- In Oaklands Rise a new residential development, there is a community room and café available for hire; and
- The Collective, another new residential development, also offers space for community hire.

There are a limited number of publicly accessible open spaces in Old Oak, comprising:

- Midland Terrace play space, Victoria Gardens, Cerebos Gardens, canal-side spaces and the Old Oak Community Gardens. There are also some inaccessible green spaces adjacent to railways, which provide value as wildlife habitats and visual amenity.
- The Grand Union Canal is a Site of Importance for Nature Conservation of Metropolitan Importance.
- Wormwood Scrubs is the largest nearby open space and is designated as Metropolitan Open Land and a Metropolitan Park. Wormwood Scrubs is a 10 to 20 minute walk from the majority of Old Oak.

Lack of access to open space disproportionately impacts deprived areas, ethnic minority groups, and religious minority groups in London; in areas where more than 40% of residents are from black or minority ethnic backgrounds, there is significantly less green space compared to predominantly white areas, and the available spaces are often of poorer quality. This lack of quality green space contributes to higher levels of stress, poorer physical health, and a feeling of insecurity among these communities.⁶³

Further to these, the wider OPDC area and surrounding neighbourhoods of Ealing, Acton, Shepherd's Bush and Harlesden provide a range of community resources and services that local residents may rely on, particularly protected characteristic groups. These include, but are not limited to:

⁶⁰ OPDC (2023) Old Oak West Community Engagement Summary Report. Available at: [Old Oak West Supplementary Planning Document \(SPD\) | London City Hall](#)

⁶¹ UK Government (2023) Arrests – Ethnicity facts and figures. Available at: [Arrests - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](#)

⁶² Greater London Authority (2021) Understanding serious violence among young people in London. Available at: [a-public-health-approach-to-serious-youth-violence - London Datastore](#)

⁶³ Design Council (2010) Community green: using local spaces to tackle inequality and improve health. Available at: [community-green-full-report.pdf \(designcouncil.org.uk\)](#)

- Educational facilities: Melrose Nursery School, Maples Nursery School and Children's Centre and John Perryn Primary School located south of North Acton Underground Station; Phoenix Academy, Old Oak Community and Children's Centre and Imperial College London, Hammersmith Campus located south of Wormwood Scrubs Open Space; and Harlesden Primary, Newfield Primary School and The Stonebridge Schools located north of Willesden Junction.
- Healthcare services: Central Middlesex Hospital located north west of North Acton Underground Station and Hammersmith Hospital located south of Wormwood Scrubs Open Space.
- Leisure and shopping: Royale Leisure Park and local supermarkets located within the OPDC area and Westfield Shopping Centre located in Shepherd's Bush.

4.3.4 Health and wellbeing

The most recent health and wellbeing information highlights that there are varied health issues affecting residents in East Acton ward, summarised below and presented in comparison to the three boroughs in **Table 4-6**:

- Brent has the highest proportion of residents with a long-term limiting illness or disability.
- Brent also has the highest proportion, just over a quarter, of children in year-6 with obesity (including severe obesity).
- Smoking prevalence (regular and occasional) amongst 15-year-olds is highest in London, followed locally by East Acton and Ealing.
- Hammersmith & Fulham, and East Acton, have the highest standardised incidence ratios (SIR) of lung cancer.⁶⁴ They also both have the highest standardised mortality ratios (SMR)⁶⁵ for cancer deaths.
- Brent and Ealing contrastingly have the highest average mortality ratio for all causes of death excluding cancer (all causes, circulatory disease, coronary heart disease, stroke, respiratory disease).

Table 4-6: Health and wellbeing indicators in East Acton and the three boroughs⁶⁶

	Brent	Ealing	Hammersmith & Fulham	East Acton	London
Long-term limiting illness or disability	14.4%	14.1%	12.6%	12.9%	14.2%
Prevalence of year-6 obesity	26.1%	24.7%	20.5%	23.9%	24.8%
Smoking prevalence amongst 15-year-olds	4.2%	5.4%	4.6%	5.4%	6.2%
SIR of lung cancer ⁶⁷	80.6	82.0	125.3	113.4	96.9
SMR of cancer deaths ⁶⁸	81.5	86.3	94.5	104.6	95.6
Mortality ratio for other deaths ⁶⁹	90.9	93.3	89.7	83.2	90.3

⁶⁴ Centre for Disease Control and Prevention (2022) 'Standardised incidence ratio is an estimate of the number of cancer cases in a given population compared to what might be expected based on a comparison with the cancer experience in a larger population'. Available at: [Standardized Incidence Ratio \(SIR\) \(cdc.gov\)](https://www.cdc.gov/std/index.html)

⁶⁵ INED (2024) 'The standardized mortality rate (SMR) is the ratio of the number of deaths observed in a population over a given period to the number that would be expected over the same period if the study population had the same age-specific rates as the standard population'. Available at: [Standardized mortality ratio - Ined - Institut national d'études démographiques](https://www.ined.fr/en/standardized-mortality-ratio-ined-institut-national-etudes-demographiques)

⁶⁶ Office for Health Improvement and Disparities (2021) Local Health. Available at: [Local Health - Office for Health Improvement and Disparities](https://www.healthimprovement.org/local-health)

⁶⁷ The term 'SIR' stands for Standardised Incidence Ratio and 'SMR' stands for Standardised Mortality Ratio. This is a ratio used in epidemiology to compare the observed number of cases/ deaths in a study population to the number of cases that would be expected based on a larger, standard population. The SIR helps to determine if the incidence of cancer in the study population is higher or lower than expected. For example, SIR of 113.4 means the observed number of deaths in the study population is 13.4% higher than would be expected based on the standard population.

⁶⁸ Ibid62.

⁶⁹ Ibid62.

Across the three boroughs, the average life expectancy for females is 83.4 years similar to the London average (83.5 years), while the average expectancy for males is 78 years sitting lower than the London average of 79 years. In London, health inequalities disproportionately impact certain groups and particular areas, such as those experiencing deprivation and ethnic minority groups. For example, the average gap in life expectancy between the least and most deprived Middle Layer Super Output Areas is 4.4 years for males and 6.3 years for females, and South Asian and Black people are 2-4 times more likely to develop type 2 diabetes mellitus.⁷⁰

The ratio of registered patients to GPs indicates that in North West London (encompassing the constituencies within Brent, Ealing, and Hammersmith & Fulham), there are 2,263 patients per GP. This is higher than the ratio in London, 2,043 patients per GP, and significantly higher than South West London, 1,799.⁷¹ Areas of high socio-economic disadvantage are more likely to be impacted severely by poor access to GP surgeries which leads to widening of pre-existing health inequalities.⁷²

Data on average estimated prevalence of common mental disorders (% of population aged 16 & over) is displayed in **Table 4-7**. Across the three boroughs Brent consistently has the highest prevalence among the population, among those aged 16+ and 65+, followed closely by Hammersmith & Fulham then Ealing. All three boroughs exceed the London average and the England average across both age groups.⁷³

Table 4-7: Prevalence of common mental health disorder (% of population)

Prevalence of common mental health disorder	Brent	Ealing	Hammersmith and Fulham	London	England
% of population 16 years and over	20.8	19.2	20.4	19.3	16.9
% of population ages 65 and over	12.6	11.8	12.5	11.3	10.2

Wider determinants of health such as the rate of complaints about noise (calculated as the number of complaints per year per local authority about noise per thousand population) is also available at borough level. The data highlights a significant variation across the three boroughs. Hammersmith & Fulham has the highest rate of noise complaints at 68.9 complaints per thousand population per year, which is considerably higher than the London average of 40.1 and the England average of 12.0. Brent, with a rate of 12.5, is slightly above the England average but well below the London average. Ealing has the lowest rate of noise complaints among all geographies at 5.7.⁷⁴ Heightened noise levels can negatively affect people who spend more time at home such including older people, people with disabilities and long-term limiting illnesses and pregnant women or women on maternity leave, or those caring for small children. Increased noise levels can also have a differential impact on neurodivergent people who can have heightened sensitivity to loud noises and may struggle to filter out background sound.⁷⁵

4.3.5 Transport infrastructure and connectivity

The Old Oak SPD highlights that there is an existing lack of infrastructure in the Old Oak area that supports walking, cycling, and people using mobility aids.⁷⁶ Poor transport infrastructure, inadequate connectivity, and substandard active travel infrastructure can disproportionately affect certain

⁷⁰ Institute of Health Equity (2022) A snapshot of health inequalities in London. Available at: [A snapshot of health inequalities in London - IHE \(instituteofhealthequity.org\)](https://www.instituteofhealthequity.org/)

⁷¹ House of Commons Library (2024) Ratio of registered patients to GPs, May 2024. Available at: [Constituency data: GPs and GP practices \(parliament.uk\)](https://commonslibrary.parliament.uk/constituency-data/gps-and-gp-practices/)

⁷² University of Cambridge (2021) Worsening GP shortages in disadvantaged areas likely to widen health inequalities. Available at: [Worsening GP shortages in disadvantaged areas likely to widen health inequalities | University of Cambridge](https://www.cambridge.ac.uk/news-and-features/worsening-gp-shortages-in-disadvantaged-areas-likely-to-widen-health-inequalities)

⁷³ Office for Health Improvement & Disparities (2017) Estimated prevalence of mental disorders: % of population aged 16 & over. Available at: [Mental Health and Wellbeing JSNA - OHID \(phe.org.uk\)](https://www.phe.org.uk/publications/mental-health-and-wellbeing/jsna-ohid)

⁷⁴ Office for Health Improvement & Disparities (2017) Estimated prevalence of mental disorders: % of population aged 16 & over. Available at: [Mental Health and Wellbeing JSNA - OHID \(phe.org.uk\)](https://www.phe.org.uk/publications/mental-health-and-wellbeing/jsna-ohid)

⁷⁵ Moller, R. (2024) What do we know about noise sensitivity in Autism?. Available at: [What Do We Know About Noise Sensitivity in Autism? \(abtaba.com\)](https://www.abtaba.com/what-do-we-know-about-noise-sensitivity-in-autism/)

⁷⁶ OPDC (2024). Old Oak West Supplementary Planning Document. Available at: [Old Oak West Supplementary Planning Document \(SPD\) | London City Hall](https://www.london.gov.uk/what-we-do/planning-and-building/planning-policy/planning-policy-framework/planning-policy-framework-supplementary-planning-document)

protected characteristic groups, limiting their access to essential services, employment, and social opportunities.

Transport for London research highlights that buses are the most affordable, accessible and widely available mode of public transportation in the city and that younger and older people, those on lower incomes, women and disabled people are more likely to heavily rely on buses.

In terms of active travel, people living in the most deprived areas of London, Black, Asian and minority ethnic groups, disabled people and older adults are less likely to achieve the Mayor's target of 20 minutes of active travel per day. However, Black, Asian and minority ethnic groups are more likely to consider taking up cycling than white Londoners. Barriers to cycling experienced by these underrepresented groups include concerns over road danger, the cost of equipment, fear of harassment, and perceiving cycling as not being for 'people like me'.⁷⁷

Table 4-8 presents the average public transport journey times to access various services within the three boroughs compared to the national average. The data highlights that Hammersmith & Fulham consistently offers the shortest travel times across all service types. For instance, the average journey to an employment centre is 12.5 minutes in Hammersmith & Fulham, significantly lower than Ealing (19.5 minutes) and the national average (29 minutes). All three boroughs have faster access times to all services on average compared to England.

Table 4-8: Average public transport journey times (minutes) to different services⁷⁸

Service type	Brent	Ealing	Hammersmith & Fulham	England
Employment centre	17	19.5	12.5	29
GP Surgery	6	6	5.2	11
Primary school	6.7	7	4.9	9
Secondary school	10.1	11.3	8	16

Review of data for North Acton MSOA reveals that 56.8% of households do not own a car or van. This is similar to the proportion in Hammersmith & Fulham, but significantly higher than the proportions in Brent, 44.1%, and Ealing, 36.8%. All of the London geographies have a significantly higher proportion of households that do not own a car or van compared to England, 23.5%.⁷⁹ There are multiple factors that determine car ownership rates; proximity to public transport infrastructure and ease of access to essential services mitigate the need for owning a car, which supports the high proportion of households without a car or van in Hammersmith & Fulham given its low average public transport times to services. Moreover, socio-economic disadvantage is a driving factor behind low car ownership, with 64% of households that earn between £10,000 and £19,999 not owning a car in London.⁸⁰

Table 4-9 below presents data from the National Travel Survey on the share of trips by travel mode and ethnic group in London in 2021. The data highlights notable differences in travel mode preferences between white and ethnic minority groups in London. White individuals are more likely to drive a car or van, with 23.6% of trips as drivers compared to 17.6% for ethnic minorities. Conversely, ethnic minorities have a significantly higher usage of London buses, at 33.6%, compared to 5.3% among white individuals. Ethnic minorities also use the Underground more frequently (8.3% compared to 5.0%). Both groups show similar levels of walking and cycling. Surface rail usage is more common among white individuals (6.3%) than ethnic minorities (2.8%).

⁷⁷ Transport for London (2024) Equity in Motion. Available at: content.tfl.gov.uk/equity-in-motion-full.pdf

⁷⁸ National Audit Office (2020) Transport accessibility to local services: a journey time tool. Available at: [Transport accessibility to local services: a journey time tool - NAO report](#)

⁷⁹ ONS (2022) Census 2021: Census Maps. Number of cars or vans. Available at: [Number of cars or vans - Census Maps, ONS](#)

⁸⁰ Mayor of London (2023) Car ownership in London. Available at: [Car ownership in London | London City Hall](#)

Table 4-9: Share of trips by travel mode and ethnic group in London, 2021⁸¹

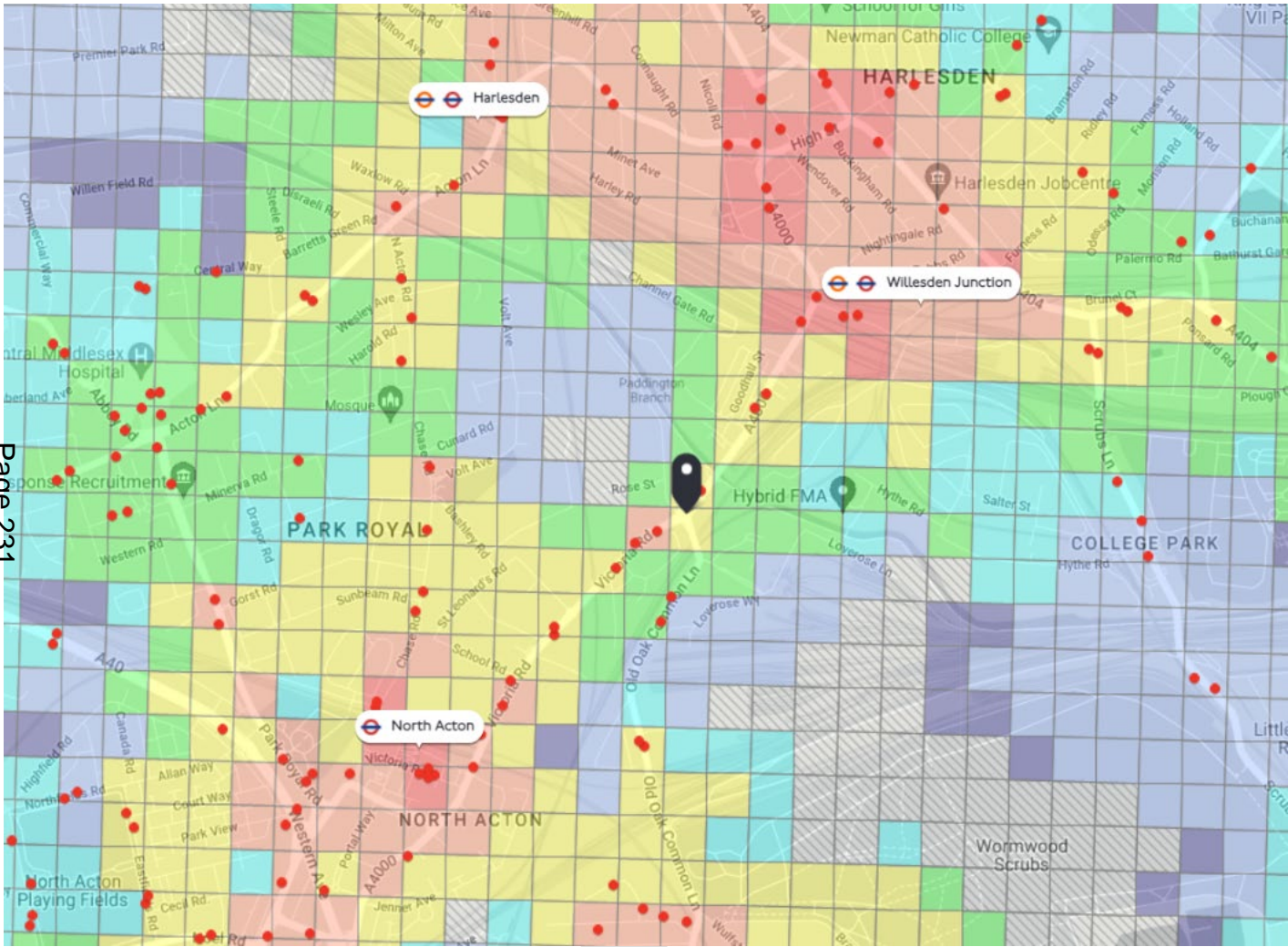
Travel Mode	White (%)	Ethnic Minority (%)
Walk	40.2	37.4
Pedal	3.8	3.9
Car or van driver	23.6	17.6
Car or van passenger	13.5	14.5
London bus	5.3	33.6
Underground	5.0	8.3
Surface rail	6.3	2.8

Figure 4-2 below presents an overview of the Old Oak area through Transport for London's Public Transport Access Tool (PTAL), the tool assesses connectivity (level of access) to the transport network, combining walk time to the public transport network with service wait times.⁸² This highlights that the Old Oak area experiences varying levels of transport connectivity. To the north and south, connectivity is rated between 5 and 6a due to the proximity of Willesden Junction and North Acton stations respectively. However, the majority of the area where businesses and residential streets are located within Old Oak (i.e. between the two stations and along Old Oak Common Lane and Victoria road) has worse connectivity with ratings between 3 and 4 on the PTAL scale.

⁸¹ Department for Transport (2022) National Travel survey. Data table nts9917. Available at: [National Travel Survey: 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/national-travel-survey-2022)

⁸² TfL (2024) WebCAT. Available at: [Webcat planning tool - Transport for London \(tfl.gov.uk\)](https://www.tfl.gov.uk/roadworks/planning-tools/webcat/)

Figure 4-2: PTAL key and map of the Old Oak area



PTAL: a measure which rates locations by distance from frequent public transport services.

Map key - PTAL

0 (Worst)	1a
1b	2
3	4
5	6a
6b (Best)	

Map layers

PTAL (cell size: 100m)

5. Primary research findings

5.1 Introduction

This section presents the findings from the primary research conducted by AECOM's primary research team with Old Oak businesses and residents between **27th August - 20th September 2024 and 12th – 16th June 2025**. This research consisted of survey interviews with **directly** affected businesses and residents as well as businesses and residents affected by the wider regeneration proposals.

The findings in this chapter are representative of survey respondents only- and in some cases there may be a small number of respondents.⁸³ These figures and analysis are used to provide OPDC and other interested parties with insights into perceptions and preferences regarding key issues. For the purpose of reporting, we have removed options where no responses were given.

5.2 Directly affected business interests

Surveys were undertaken with businesses that may be directly impacted by the potential CPO to better understand the ownership and use of businesses and organisations within the area and to determine the potential impacts and opportunities of the Proposed Regeneration.

The primary research team approached 30 businesses for surveying. A total of 22 responses were received.

5.2.1 Nature of the businesses

Surveys were only completed by the business owner or manager, or someone who had been delegated permission to complete the survey on the owner or manager's behalf. **Table 5-1** summarises the breakdown of respondent's positions within the business, indicating the majority of respondents (62.5%) were a business manager. All of the respondents stated that they work full-time.

Table 5-1: Business position

Question	Options	Respondents
What is your position within the business?	I own the business/organisation	31.8%
	I am the business manager	54.5%
	Other – I have the permission of the owner or manager to respond to this survey.	13.6%
Response rate	Answered question	22
	Skipped question	0

As shown in **Table 5-2**, 50% of respondents were the main leaseholder of their premises and 22.7% own both the property and land as freeholders. This indicates a high proportion of established businesses and a comparatively low percentage of businesses temporarily renting units.

⁸³ The findings of surveys undertaken with two businesses affected by the wider regeneration proposals have not been included in this chapter to avoid identification of the businesses, information relating to the nature of the business and diversity of the owners/employees have been excluded.

Table 5-2: Leasehold status of business

Question	Options	Respondents
What is the leasehold status of your premises?	Freeholder	22.7%
	Main leaseholder	50.0%
	Sub-leaseholder	9.1%
	Other	4.5%
	Don't know	13.6%
Response rate	Answered question	22
	Skipped question	0

Table 5-3 reveals that the majority of businesses that responded are independent (86.4%) while a small proportion fit into other categories including a community organisation (4.5%). This could potentially indicate issues around relocation for the majority of businesses given that they are independent businesses.

Table 5-3: Business category

Question	Options	Respondents
Which of the following best fit the category this organisation fits into?	Independent business	86.4%
	Community organisation	4.5%
	Other	9.1%
Response rate	Answered question	22
	Skipped question	0

Figure 5-1 provides a breakdown of the types of businesses surveyed. The majority of respondents categorised themselves as 'other' (18.2%), namely public transport services, imports and exports, skip hire and waste management, and distribution businesses. The type of business that comprises the greatest individual proportion of those surveyed were manufacturing, construction businesses and car repair/services businesses. Of the businesses that responded, 40.9% are directly open to customers at Old Oak.

Figure 5-1: Business types

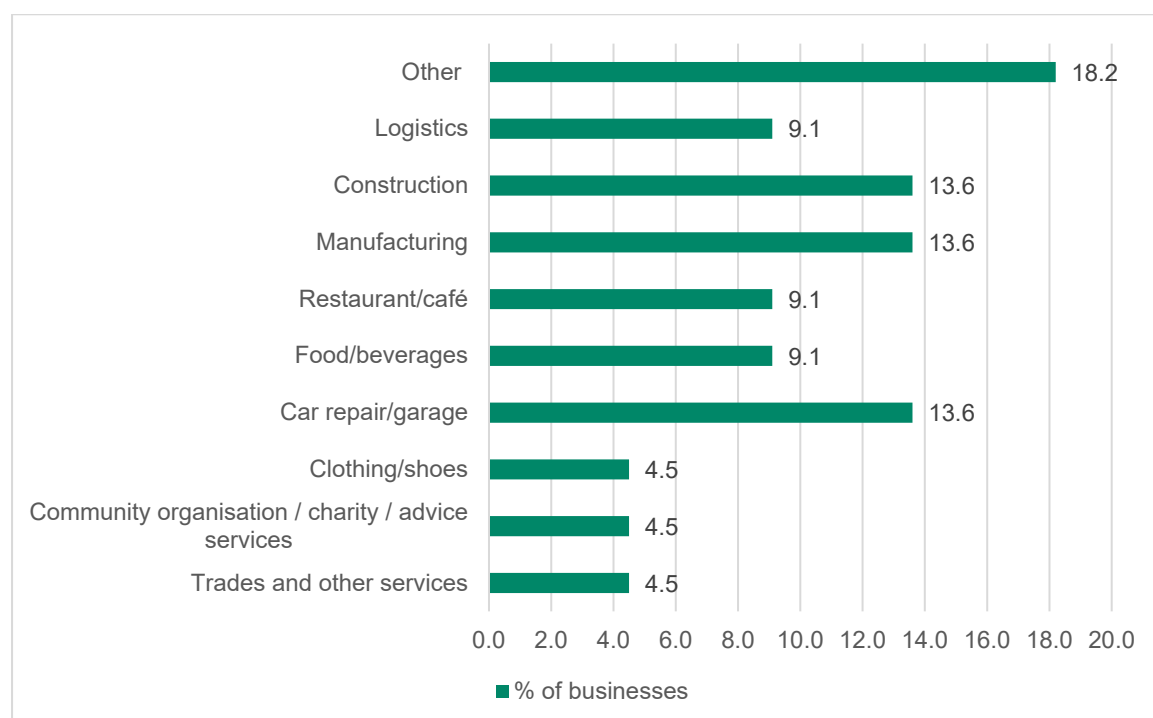


Table 5-4 summarises the length of time that businesses have operated at their current location. Half of the businesses surveyed have been at their current location for over ten years, while only 13.6% of business had been on site for less than 2 years.

Table 5-4: Length of time in operation at current location

Question	Options	Respondents
How long has the business/organisation operated in its current premises	Less than 12 months	4.5%
	Between one and two years	9.1%
	Between three and five years	27.3%
	Between six and ten years	9.1%
	More than ten years	50.0%
Response rate	Answered question	22
	Skipped question	0

5.2.2 Diversity of business owners/managers

The majority of businesses (95.5%) were owned or managed by men. **Figure 5-2** shows the age breakdown of respondents, revealing that half of business owners/managers were aged 35-44 while younger and older business owners represent the smallest proportion of age groups (18.2%).

Figure 5-2: Age groups of business owners/managers/respondents

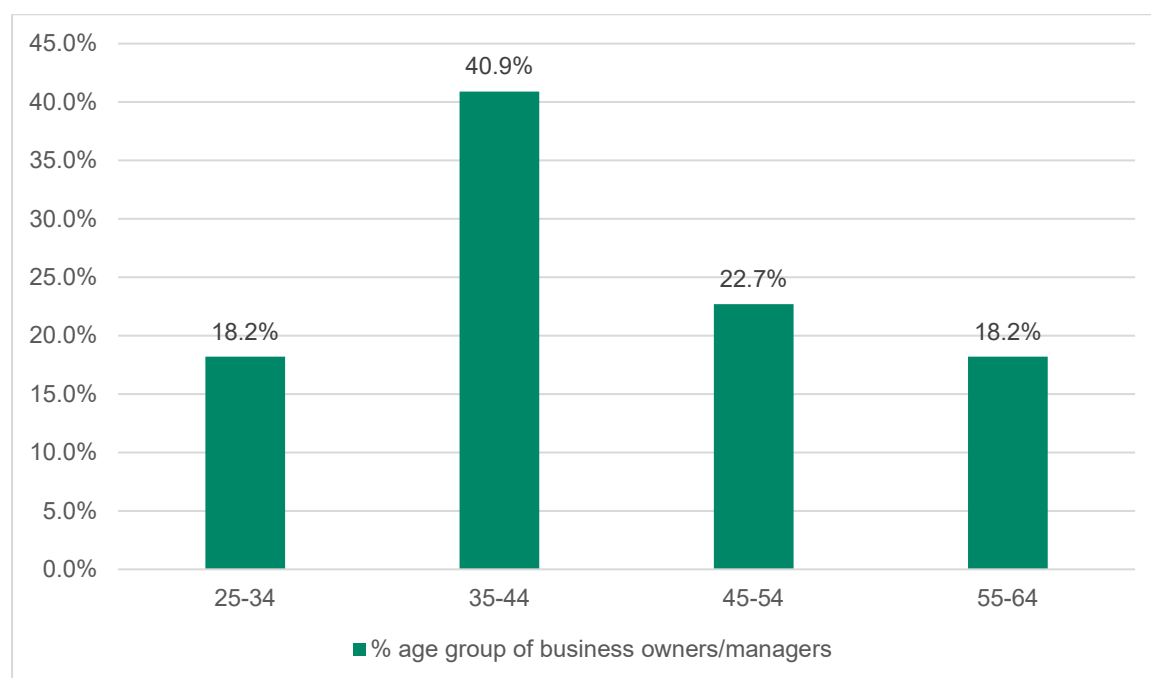


Table 5-5 summarises the ethnic group of business owners/managers. This reveals that the majority of businesses are owned/ managed by people from non-white ethnic groups (63.6%), largely comprised of those who specified 'other ethnic group', this includes Persian, South African and Kurdish. None of the respondents indicated that they were asylum seekers.

Table 5-5: Ethnic group of business owners/managers

Question	Options		Respondents
Which of the following ethnic groups do you feel you belong to?	White	English/ Welsh/ Scottish/ Northern Irish/ British	27.3%
		Other	9.1%
	Asian/ Asian British	Indian	9.1%
		Other	9.1%
	Black/ African/ Caribbean/ Black British	Other	9.1%
	Arab		18.2%
	Other Ethnic Group		18.2%
Response rate	Answered question		22
	Skipped question		0

Table 5-6 summarises the religion of business owners/managers that responded. The majority of business owners/managers are Muslim (43.8%), while only 18.8% are Christian.

Table 5-6: Religion of business owners/managers

Question	Options	Respondents
What is your religion?	Christianity	18.8%
	Islam	43.8%
	No religion	25.0%
	Refused/ prefer not to say	12.5%
Response rate	Answered question	16
	Skipped question	6

All of the business owners/managers identify as heterosexual.

5.2.3 Employees

Table 5-7 summarises how many people are employed full-time at the premises, including the respondent. The majority of businesses employ over 6 people (63.7%) with microbusinesses comprising 36.3% of the respondents.

Table 5-7: Number of people employed on the premises full-time

Question	Options	Respondents
How many people are employed full-time at the premises?	One person	13.6%
	Between two and five people	22.7%
	Between six and ten people	36.4%
	Between eleven and twenty people	9.1%
	More than twenty people	18.2%
Response rate	Answered question	22
	Skipped question	0

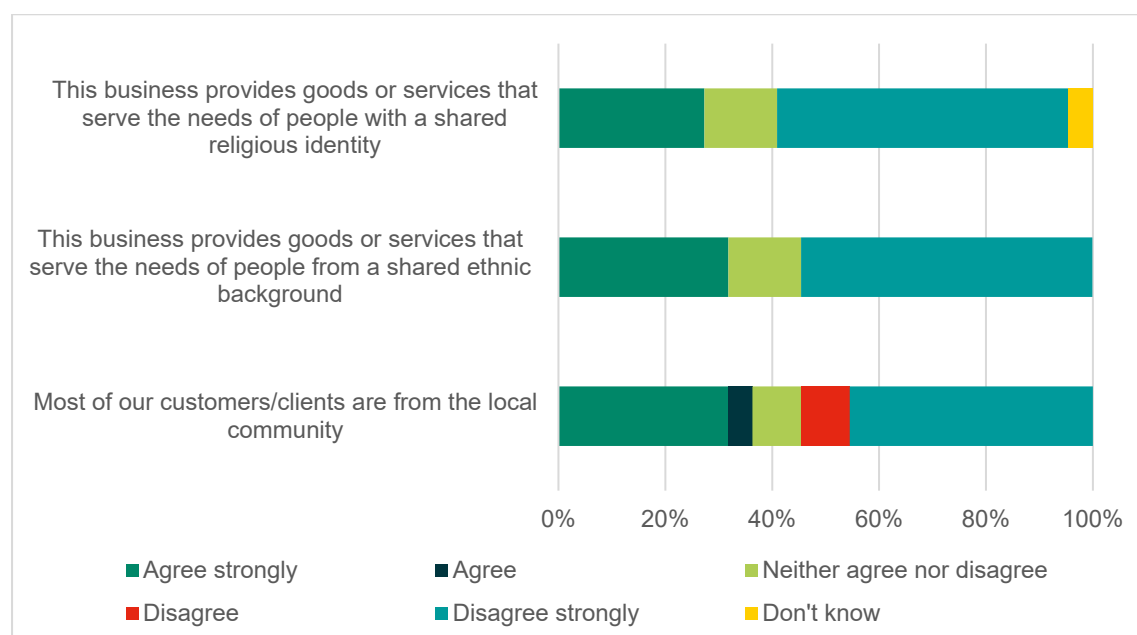
Overall, most businesses reported that their employees belonged to a mixture of ethnic groups with the majority being non-white groups (75.1%), including 31.3% Arab, 31.3% Asian or an Asian ethnic sub-group, and 12.5% reporting that some employees were Black African. While 6.3% of businesses stated they had employees from all of the ethnic groups.

Amongst respondents who stated that their employees were from one ethnic group, the largest proportion were Asian/Asian British (18.8%) compared to 6.3% White.

5.2.4 Profile of businesses' customer base

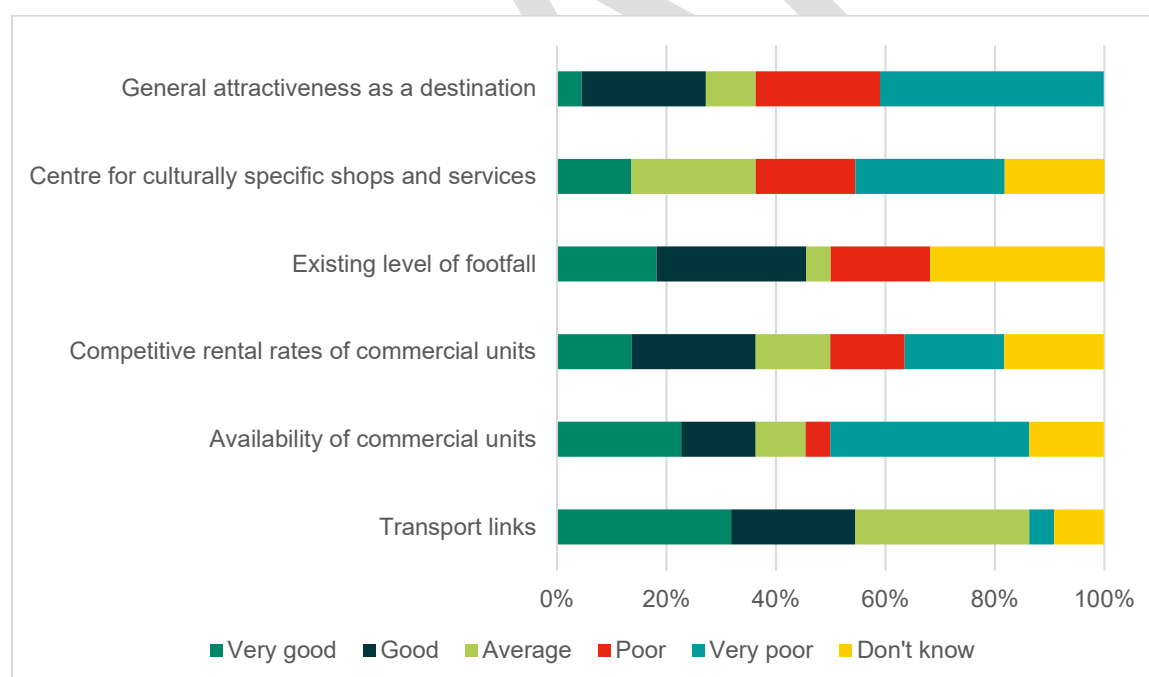
Businesses were asked to confirm the extent to which they agreed with a set of statements relating to their businesses and its customers. **Figure 5-3** demonstrates that less than 40% of businesses agreed that their business serve the local community, a lower percentage agreed that their businesses specifically serve the needs of particular ethnic or religious groups.

Figure 5-3: Shared protected characteristics of customers



Businesses were asked how they would rate the area as a location for business against a number of factors, presented in **Figure 5-4**. Transport links was the factor rated most positively, with 54.5% of respondents rating it as good or very good, while general attractiveness of the destination was rated poor or very poor by the majority of respondents (63.6%). Just under 40% of respondents also felt that the availability for commercial units was poor or very poor.

Figure 5-4: Views on the existing site



5.2.5 Businesses and potential regeneration interests

Table 5-8 summarises businesses preferences if the regeneration of Old Oak were to require them to seek new accommodation. The majority of respondents (66.6%) said they would prefer to relocate in the immediate neighbourhood followed or elsewhere within the Old Oak and Park Royal Development Corporation area. This indicates a preference for businesses to remain within the locally.

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Table 5-8: Business relocation preferences

Question	Options	Respondents
In an event where the regeneration of Old Oak would require you to seek new accommodation, what would be the preferred option for your business?	In the immediate neighbourhood (within a 10-minute walk of this address)	47.6%
	Elsewhere within the Old Oak and Park Royal Development Corporation area	19.0%
	Elsewhere in the London Borough of Hammersmith and Fulham	9.5%
	Elsewhere in London	14.3%
	I would consider moving away for a short period but I would like to be relocated back into Old Oak once new properties are here	4.8%
Response rate	Answered question	22
	Skipped question	0

Table 5-9 summarises the measures (if any) businesses would consider helpful in enabling them to continue operating their business. No clear preference was indicated with equal weighting across assistance in finding alternative accommodation, affordable business space and support with the upfront costs.

Table 5-9: Measures to enable businesses to continue operating

Question	Options	Respondents
If the regeneration of the area progresses what measures (if any) do you consider would be helpful in enabling you to continue to operate your business?	Assistance in finding alternative accommodation elsewhere.	33.3%
	Affordable business space	33.3%
	Support with the upfront costs (e.g. help with shop fit out costs)	33.3%
Response rate	Answered question	22
	Skipped question	0

Table 5-10 summarises how respondents to the survey think relocation of the business would affect their customers. While not every business responded to this question, 63.6% felt their customers would continue with the business wherever they were located. Similarly, the majority of respondents stated that they were confident the business could be set up elsewhere (72.7%). Whilst the majority of respondents stated they only had one business in the area, three businesses also owned other businesses locally.

Table 5-10: Customer response to relocation

Questions	Options	Respondents
How do you think that the relocation of your business would affect your customers?	Our customers would continue to use our services wherever we were located	63.6%
	Our customers would go to other businesses to use the same services	22.7%
	Not answered/ Don't know	13.6%
Response rate	Answered question	19
	Skipped question	3

5.3 Directly affected residential interests

Surveys were undertaken with residents that may be directly impacted by the potential CPO to better understand the households within the area and to determine the potential impacts and opportunities of the Proposed Regeneration in meeting residents needs and supporting quality of life.

The primary research team approached 35 residential properties for surveying. A total of 19 responses were received. At least one property was assumed empty at the time of surveying.

5.3.1 Household composition

The following section outlines household composition of the directly affected households that responded to the survey. There are four main types of accommodation represented in these results: temporary accommodation on Old Oak Lane⁸⁴, private renter-occupied households, housing association accommodation and owner-occupied households.

The majority of residents surveyed live in a flat/studio (79%) while the remaining 21% live in a house.

Table 5-11 indicates that almost half (47.5%) of the respondents live in socially rented accommodation. . The same percentage of respondents also indicated that a Social Housing Organisation or the Council own and/or manage their property; This included Hammersmith & Fulham and Ealing Borough Councils and Peabody and Genesis Housing Associations. Only one owner-occupier responded to the survey. This owner-occupier is one of three respondents that live in a house.

Table 5-11: Breakdown of housing tenure and landlord

Questions	Options	Respondents
Does your household own or rent this accommodation?	Owns (outright or with a mortgage or loan)	5.3%
	Private rent	47.5%
	Social rent	47.5%
Response rate	Answered question	19
	Skipped question	0
Who is your landlord?	Private landlord or letting agency	42.1%

⁸⁴ The temporary accommodation is let to the London Borough of Hammersmith and Fulham (LBHF) to provide temporary housing for residents at risk of homelessness whilst LBHF looks into other longer term housing options for these residents.

Questions	Options	Respondents
	Social Housing Organisation/ Council owned	52.6%
	Other (owner occupied)	5.3%
Response rate	Answered question	19
	Skipped question	0

Table 5-12 reveals that the largest majority of respondents live alone, in a flat or studio. While 26.3% of respondents living in larger family size households (4+ people) are equally split between flats and houses.

Table 5-12: Breakdown of household numbers

Questions	Options	Respondents
How many people live at this address?	One person	47.4%
	Two people	21.0%
	Three people	5.3%%
	Four people	15.8%
	Five people +	10.5%
Response rate	Answered question	19
	Skipped question	0

Table 5-13 summarises the length of time residents have lived at their current address. A large proportion of respondents have lived in their accommodation less than two years, the majority of which are social renters occupying flats/ studios. However, 26.3% of respondents have lived in their current home for more than 10 years, with the majority of these residents living in Wells House Road.

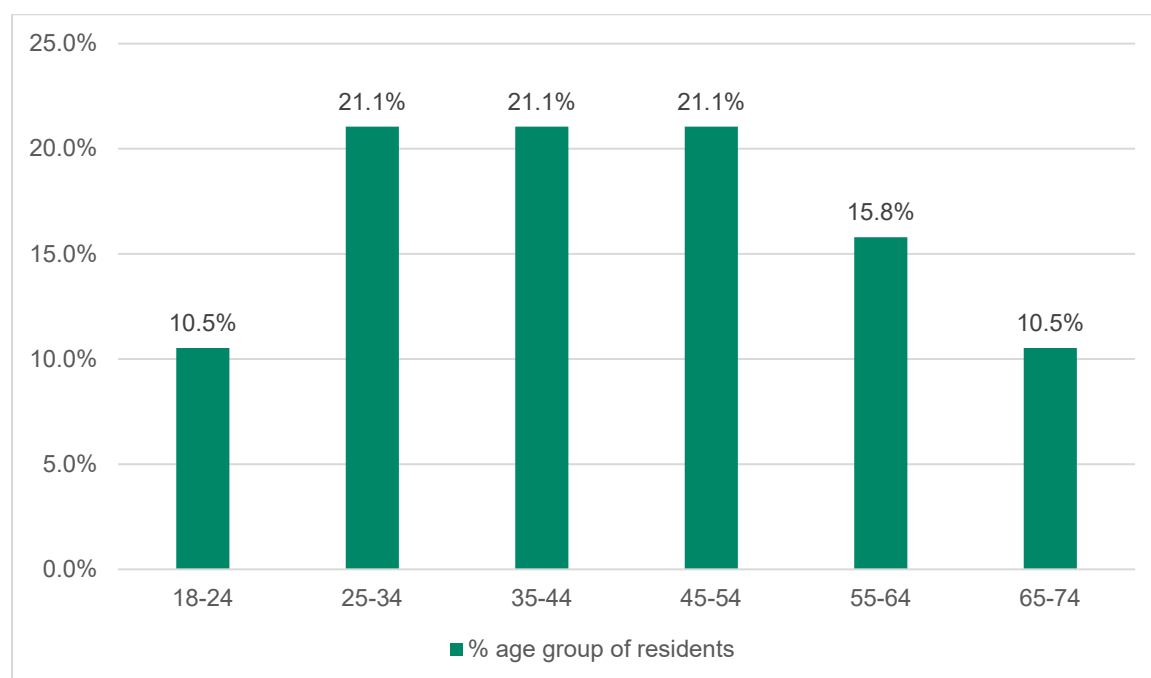
Table 5-13: Residents time at current address

Questions	Options	Respondents
How long have you lived at this address?	Less than 12 months	21.1%
	1 – 2 years	26.3%
	2 – 5 years	21.1%
	5 – 10 years	5.3%
	More than 10 years	26.3%
Response rate	Answered question	19
	Skipped question	0

5.3.2 Diversity of residents

A larger proportion of respondents were female (57.9%). **Figure 5-5** summarises the age group of residents who took part in the survey. The majority of respondents were aged 25–54-years (63.3%). Older residents aged 55 and over made up 26.3% of respondents. The proportion of younger people responding to the survey (aged 18-24) was 10.5%.

Figure 5-5: Age groups of residents



35.7% of residents reported that they or someone in their household has a long-term health problem or disability that limits their own, or another household member activities in some way.

Table 5-14 summarises the ethnic group of residents. The majority of respondents are from non-white ethnic minority groups (57.9%), the largest proportion of which identified as Black at 36.9%. One of the residents stated they were an asylum seeker. For many of the respondents taking part in the survey, English was not their first language.

Table 5-14: Ethnic group of residents

Question	Options		Respondents
Which of the following ethnic groups do you feel you belong to?	White	English/ Welsh/ Scottish/ Northern Irish/ British	15.8%
		Other	26.3%
	Asian/ Asian British		0.0%
	Mixed/ multiple ethnic group	White and Black Caribbean	10.5%
	Black/ African/ Caribbean/ Black British	African	21.1%
		Caribbean	5.3%
		Other	10.5%
	Arab		10.5%
Response rate	Answered question		19
	Skipped question		0

Table 5-15 summarises the religion of the residents, indicating that there is a disproportionately large Islamic community within the respondents (26.3%) compared to the local population within Old Oak (17.7% of the population).

Table 5-15: Religion of residents

Question	Options	Respondents
What is your religion?	Christianity	57.9%
	Islam	26.3%
	No religion	15.8%
Response rate	Answered question	19
	Skipped question	0

5.3.3 Residents and potential regeneration interests

As illustrated in **Table 5-16**, in the event that regeneration required residents to seek new accommodation, 42.1% of respondents indicated a preference to remain within the local area (i.e. within a 10-minute walk of their current address). However, collectively 47.4% stated that their preference would be within one of the three local boroughs of Brent, Ealing or Hammersmith and Fulham.

Table 5-16: Resident relocation preferences

Question	Options	Respondents
In an event where the regeneration of Old Oak would require you to seek new accommodation, what would be the preferred option for you?	In the immediate neighbourhood (within a 10-minute walk of this address)	42.1%
	Elsewhere in Borough of Brent	10.5%
	Elsewhere in the London Borough of Ealing	15.8%
	Elsewhere in the London Borough of Hammersmith and Fulham	21.1%
	Other	10.5%
Response rate	Answered question	19
	Skipped question	0

To follow up, residents were asked if there were any factors that might affect their choice of new accommodation. Of those that responded, the main factors highlighted were wanting to apply for affordable housing, being unlikely to be able to afford rent for other housing in the local area and having current use of a garden they wouldn't want to lose.

Residents also noted that they felt that the area was 'quiet', 'safe' and 'nice' and had concerns about finding an alternative area to move to with these same qualities.

5.4 Wider residential interests

Surveys were undertaken with residents who are not likely to be subject to acquisition but currently live in the areas located within 50m of the draft red line boundary shown in **Appendix A**, to better understand the households within the area and to determine the potential impacts and opportunities of the Proposed Regeneration in meeting residents needs and supporting quality of life.

In total, 54 surveys were undertaken.

5.4.1 Household composition

Approximately half (51.9%) of residents surveyed responded that they live in a house, 42.6% that they live in a flat/studio, and 5.6% live at Bashley Road Traveller Site.

Table 5-17 summarises the types of ownership amongst the indirectly affected residents who were surveyed. The largest proportion of residents own their property (44.4%), the majority of which live in a house. Private rent represents the second largest type of ownership, of which slightly more live in a flat compared to a house while social rent and shared ownership represent the smallest share of ownership.

Table 5-17: Types of household ownership- Indirect residents

Question	Options	Respondents
Does your household own or rent this accommodation?	Owens (outright or with a mortgage or loan)	44.4
	Part owns and part rents (shared ownership)	1.9
	Private Rent (with or without housing benefit)	40.7
	Social rent	11.1
	Lives here rent free	1.9
Response rate	Answered question	54
	Skipped question	0

Table 5-18 summarises the number of people who live at the address. The largest proportion of indirectly affected residents responded that they live in a two-person household at 35.2%, followed by those living in family size homes composed of four or more people (24.1%). While the lowest proportion live in one-person households at 16.7%.

Table 5-18: Number of people who live at the address- Indirect residents

Question	Options	Respondents
How many people live at the address?	One-person	16.7%
	Two people	35.2%
	Three people	18.5%
	Four people	14.8%
	Five people +	9.3%
Response rate	Answered question	54
	Skipped question	0

Table 5-19 summarises the length of time residents have lived at their current address. Compared to the potentially directly affected residents, the majority of indirectly affected residents have been at their household for significantly longer periods of time; over a third of indirect residents have lived at their property for more than 10 years, while only 18.5% have lived at their current address for less than two years.

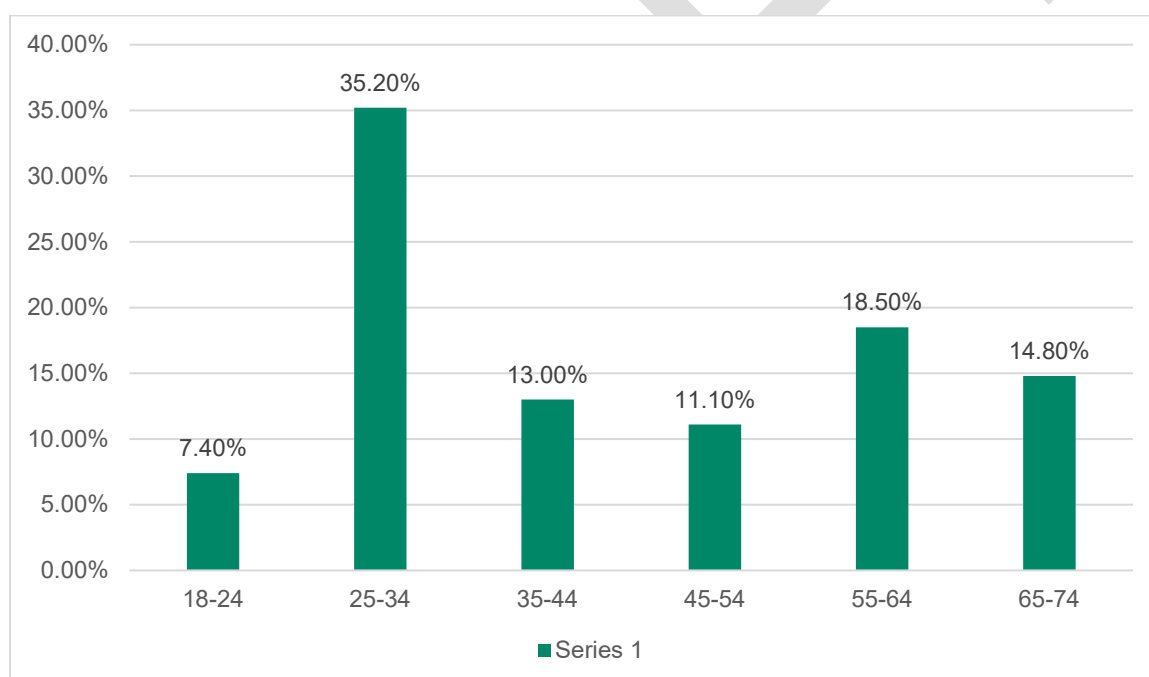
Table 5-19: Indirect residents time at current address

Question	Options	Respondents
How long have you lived at this address?	Less than 12 months	11.1%
	1 – 2 years	7.4%
	2 – 5 years	29.6%
	5-10 years	14.8%
	more than 10 years	37.0%
Response rate	Answered question	54
	Skipped question	0

5.4.2 Diversity of residents

The majority of indirect respondents were male (59.3%). **Figure 5-6** summarises the age groups of indirect residents surveyed. Similar to the direct respondents, the largest proportion of respondents were aged 25-34, representing over a third of the total group. While young people (aged 18-24) represent the smallest percentage (7.5%).

Figure 5-6: Age group of residents - Indirect residents



Of the residents surveyed, 7.4% stated they have a long-standing disability or infirmity that has lasted at least 12 months and 5.6% stated another household member has a long-standing disability or infirmity. Of those who stated that they, or someone in their household had a long-standing disability or infirmity, 85.8% stated it does limit their activities in some way.

Table 5-20 summarises the ethnic group of indirect residents that responded to the survey. Non-white ethnic groups represent slightly lower than half of these respondents (48.2%), the largest group being Asian/ Asian British at 22.3%. These proportions contrast to the direct residents, where there was a larger proportion of non-White ethnic groups. One of the indirect residents is an asylum seeker.

Table 5-20: Ethnic group - indirect residents

Question	Options		Respondents
Which of the following ethnic groups do you feel you belong to?	White	English/ Welsh/ Scottish/ Northern Irish/ British	25.9%
		Irish	3.7%
		Gypsy or Irish Traveller	3.7%
		Other White	18.5%
	Mixed/multiple ethnic group	White and Black Caribbean	1.9%
		White and Asian	1.9%
		Other Mixed	1.9%
	Asian/Asian British	Indian	11.1%
		Pakistani	1.9%
		Other Asian	7.4%
	Black/ African/ Caribbean/ Black British	African	9.3%
		Caribbean	3.7%
		Other Black	3.7%
Response rate	Arab		3.7%
	Other Ethnic Group		1.9%
	Answered question		54
	Skipped question		0

Table 5-21 summarises the religion of the indirectly affected residents. The majority of respondents are Christian (46.3%) and the largest religious minority group is Islam at 11.1%.

Table 5-21: Religion - indirect residents

Question	Options	Respondents
What is your religion?	Christianity	46.3%
	Hinduism	7.4%
	Islam	11.1%
	Judaism	1.9%
	Buddhism	1.9%
	No religion	25.9%
	Other (please specify)	1.9%
	Refused/Prefer not to say	3.7%
Response rate	Answered question	54
	Skipped question	0

5.5 Views on regeneration

Alongside the aim of better understanding businesses and residents within Old Oak, the surveys gathered views, opinions and ideas with respect to the wider regeneration project for different groups. Respondents were asked a series of questions regarding what they like/ dislike about living and working the Old Oak area now, as well as what they think will make regeneration successful/ unsuccessful in the future. These responses may provide insight into the potential impacts and opportunities of the Proposed Regeneration in meeting the needs of businesses and residents as well as supporting quality of life. Respondents were asked the following open response questions:

- What are the main (up to 3) thing/s you like about living / working in the Old Oak area now? (write answers)
- What are the main (up to 3) disadvantage/s about living / working in Old Oak now? (write answers)
- What are the main (up to) three things that you think will improve the area and make the regeneration a success?
- What are the main (up to) three things that you are worried about or think would make the regeneration unsuccessful in your opinion?
- Do you wish to make any other comment about the regeneration plans proposed or how these will affect you?

Firstly, respondents were asked if they had previously participated in any of OPDC's community consultation events or surveys on regeneration in Old Oak, including the Local Plan. Across the groups surveyed, respondents that are likely to be indirectly affected had the highest consultation participation rate (22.2%) compared to residents (14.3%) and businesses (12.5%) that may be directly impacted by the CPO.

However, the majority of businesses and residents were aware that there are plans for regeneration in the area around the HS2 station worksites and other land nearby. Directly affected businesses indicated the highest level of awareness, with 87.5% of respondents aware of regeneration plans, followed by indirect residents (85.2%). While the lowest awareness was amongst direct residents (57.1%).

5.5.1 Overview of responses

The following section explores the collective responses from direct and indirect interests, identifying common themes for consideration in the development of the Proposed Regeneration.

When residents and businesses were asked what they liked about living/ working in Old Oak, the following recurring responses were given:

- **Transport and connectivity:** residents and businesses felt that Old Oak is well connected by Underground and Overground services at North Acton and Willesden Junction. Respondents highlighted the benefit of connections to central London which makes commuting convenient for both residents and businesses alike, as well as convenient accessibility for customers and visitors.
- **Sense of community:** responses to the survey highlight a strong sense of community amongst residents that have lived in Old Oak for a long time and who have a good relationship with neighbours. Some residents like that Old Oak can be quiet in the immediate area and maintain privacy as the area is not densely populated. While some businesses identified the benefit of local customer bases who rely on their services, especially long-standing businesses.
- **Local networks:** Residents favour the proximity to essential local amenities such as nurseries, schools and social networks including friends.

When asked what they disliked about living/ working in Old Oak, residents and businesses responded as follows:

- **Industry and construction:** the majority of responses referred to the noise, dust or traffic related issues within Old Oak. While the area is largely industrial, most respondents specified that the ongoing HS2 works is the source of disruption. This is primarily traffic related with road closures, lack of parking and congestion causing delays to resident's daily journeys and businesses trying to reach customers. A few respondents specified that regular hospital appointments and school drop offs have been significantly affected by the current construction activities.
- **Lack of social amenities:** some respondents expressed that there are limited social activities and venues available, in particular there is a scarcity of social meeting places such as pubs and restaurants. The lack of social infrastructure is especially felt by young people and professionals working in the area and has led to a perception that there is not much to do in the local area.
- **Transience:** Some residents expressed that Old Oak has become a more transient population which may contribute to a lack of community cohesion.

In terms of views of the Proposed Regeneration, residents and businesses were overall supportive of the proposals for new homes, high streets, local amenities, leisure facilities and green open space. Across the respondents, there was a focus on regeneration making the area a more vibrant and social place. Residents were encouraging of proposals that increase the 'neighbourhood-feel' within Old Oak. Some respondents also focused on the provision of new affordable homes which was perceived as a benefit of regeneration. However, one respondent highlighted that these homes need to be 'truly affordable' to the local community it serves.

The main concerns were with the traffic congestion, noise and dust associated with construction activities. The majority of respondents had already expressed dissatisfaction with the ongoing HS2 construction works and indicated that they are concerned about the cumulative impacts as a result of the Proposed Regeneration being undertaken in quick succession. Some respondents also expressed concern about project delays or lack of funding causing elongated construction impacts.

Further, some residents identified concerns surrounding the neighbourhood and community, in particular overcrowding and infrastructure not keeping up with the demand of an expanding population. Alongside this, a few responses thought the regeneration may be unsuccessful through encouraging more transient residents such as students to take up new homes here which could exacerbate the lack of community identity.

5.5.2 Key groups

In analysing the findings of primary research, including views on regeneration, there are a few key groups that have been identified as potentially having different needs compared to the wider population. The following section outlines perceived issues and opportunities as they relate to each of these groups.

Younger People

For the purpose of this analysis, we have considered those aged 18-34 as younger people.

Across directly and indirectly affected younger people that responded to the survey, the majority privately rent (55.5%) and the remaining either own their homes (25.9%) or socially rent (22.2%).

Responses from this age group revealed the following common themes regarding the benefits and disadvantages of living in the Old Oak area:

- **Transport connections:** the majority of younger people mentioned the benefit of good transport links and connectivity to the surrounding local area and London, especially with the option of both overground and underground services nearby.
- **Accessibility to central London:** in particular, this age group highlighted how easily they can commute to central London from Old Oak for work.

- **Lack of social life:** younger respondents noted the shortage of social amenities in Old Oak. They identified the absence of socialising facilities such as restaurants, cafés and pubs, which limit their opportunities for social interaction and leisure activities.

In light of these views, younger survey respondents expressed support for the Proposed Regeneration providing increased local amenities including shops and restaurants, making the area busier and more social, and improved public realm including green space and the Canalside.

This group also felt that the continued and increasing disruption during construction and the potential for rent to increase as a result of the area becoming more popular could make regeneration unsuccessful.

Older people

Older people, aged 65+, were also identified as a key population group that mentioned the following themes:

- **Local attachment:** Older residents expressed a sense of attachment to the local area as a result of their childhood upbringing being in Old Oak and/ or living in Old Oak for their whole life.
- **Industry and construction:** as with younger people, Old Oak is considered noisy, dusty and polluted as a result of nearby manufacturing and HS2 related construction. Traffic congestion and road works were also identified as drawbacks of living in the area.

However, contrasting views emerged regarding the transience of the population. Some older residents felt that the transient nature of the existing population has decreased feelings of community cohesion, others liked that the local area is quiet and not densely populated. The latter residents expressed concern that regeneration could be unsuccessful because areas may become overpopulated and where there is not enough infrastructure to support the community. One resident also expressed concerns about the loss of light through the construction of new buildings nearby.

There were also a mixture of views regarding public transport services, with a few older residents expressing that public transport provision was not adequate in Old Oak, especially bus services, while others highlighted the convenience of local transport links. This indicates a need to better understand what public transport modes the older population rely on more and whether regeneration could improve this provision.

Muslim community

There is a slightly disproportionately large Muslim population living within Old Oak. Primary research has identified the following common views and opinions about the local area and Proposed Regeneration across directly and indirectly affected respondents from this group:

- **HS2 construction:** this group highlighted the disruption of HS2 construction, particularly noise at night and parking obstructions. Additionally, one resident reported that the inappropriate behaviour of some HS2 workers had made them personally feel unsafe when visiting a nearby park.
- **Increased cost of living:** there is a shared concern across the group about the rising cost of rental and living expenses due to the Proposed Regeneration, especially within large family households.
- **Lack of local services (e.g. schools):** a few respondents indicated dissatisfaction with the provision of good schools for their children and accompanying transport links. Consequently, the group expressed support for plans to provide a new school through the regeneration.

The CPO may result in the loss of community centre that serves the Muslim community.

"What will happen to our place and what we provide to our local community... we are the only place like this that provides this community service in the area."

People living in temporary accommodation

A disparity in views emerged between those living in temporary accommodation provided by the Council compared to other directly affected residents.

While this group were generally supportive of the Proposed Regeneration, when asked to share their views and opinions on living in Old Oak and the Proposed Regeneration there was a high frequency of respondents that stated 'nothing', 'don't know' or 'no idea'. The nature of temporary accommodation and knowledge that this population group is more transient (occupying their accommodation for less than two years), this lack of response implies that residents may not have any attachment to the local area and therefore investment in the Proposed Regeneration. This group may not intend to remain within the Old Oak area with one respondent stating that regeneration may provide an opportunity to leave the Old Oak area.

Of those that did respond, findings highlight that the area is unsafe, dirty and there are often crime related disturbances. Specific incidents reported in the survey relayed events that happened within the temporary accommodation building. Therefore, these disadvantages of living in Old Oak may be reflective of the quality of housing provided by the Social Housing Organisation/ Council.

One respondent stated that "It's just a roof over my head."

Bashley Road Travellers Site

Bashley Road Travellers Site is a designated Travellers Site within the Borough of Ealing. The population occupying the site were identified as indirect interests representing an established community with protected characteristics. Therefore, it was important that their views and opinions on Old Oak and the Proposed Regeneration were represented in the survey.

While these respondents were generally supportive of the Proposed Regeneration, particularly the provision of new leisure facilities and green open space, the survey revealed dissatisfaction with ongoing construction in close proximity to the Travellers Site. As a result of this, respondents raised concerns about the potential for cumulative construction impacts on their community during the construction period for the Proposed Regeneration. Respondents particularly mentioned construction noise, traffic-related disruption and the safety of residents living alongside construction as current disadvantages that may persist.

Small businesses

The primary research findings indicate that respondents from directly affected businesses predominantly represent small independent businesses, many of which are owned/ managed by people from ethnic minority groups.

The most frequently mentioned benefit of working in Old Oak was the convenience of the location for trading. Businesses mentioned several factors that contribute to this convenience, including established community links and customer bases, proximity to customers in central London, good transport connectivity to bring in business and safety within the area.

Comparatively, businesses most frequently mentioned traffic issues such as congestion, noise, and lack of parking as disadvantages of working in Old Oak, in some cases specifically identifying HS2 as the cause of this disruption. One business expressed that existing traffic levels in the area and the delay caused when trying to reach customers often leads to cancellations.

When asked what would improve the area and make the regeneration a success, businesses provided a variety of responses as follows:

- The majority of businesses identified that regeneration could make the area busier and more 'upmarket'. Increasing the commercial options including new shops and restaurants would make the area more social and welcoming for young people.
- The completion of HS2 would improve transport infrastructure.

- Regeneration could create more job opportunities to the area.

One business stated that the regeneration “sounds good as [it will] bring more jobs to the area / will make the area more upmarket.”

Businesses were also asked what they thought the main (up to three) things are that they are worried about, or that they think would make the regeneration successful.

- Some small business respondents expressed concerns about business viability as a result of moving away from their local customer base and the cost of potentially having to relocate, especially for businesses with heavy materials.
- Some businesses had transport related concerns, such as busier local roads and a lack of parking spaces for new residents.
- Individual respondents also stated the following concerns:
 - Crime, poverty and anti-social behaviour;
 - Over trading as a result of increased competition and service provision from businesses occupying new commercial spaces; and
 - Potential for rents increases in the area as it becomes more popular.

6. Stakeholder consultation

6.1 Introduction

This section provides a summary of consultation and engagement activities undertaken with key stakeholders within Old Oak, as identified by OPDC and set out in **Section 2.2**.

6.2 Overview of consultation

All stakeholders were contacted via email between 16th-17th October 2024 to share their views on the regeneration opportunity at Old Oak. Stakeholders were asked the following questions:

- In the event that the Old Oak regeneration results in the loss or change to their current site, do you believe this would have any impact on employees or customers of the organisation? If yes, please describe these impacts.
- Are these impacts likely to have any disproportionate effect due to protected characteristics of employees or customers?

6.3 Stakeholder responses

Out of 15 requests, a total of four stakeholder responded to the email to provide further information on key evidence and issues relating to their role and/ or respond to the questions above. These are summarised in **Table 6-1** below.

Table 6-1: Old Oak stakeholder responses

Stakeholder	Response or information provided
Canal and River Trust	<p>Canal and River Trust attended a Microsoft Teams meeting to share existing resources and knowledge of the water space to inform the assessment of equality impacts. This includes:</p> <ul style="list-style-type: none">• The Grand Union Canal Placemaking Study⁸⁵ - written by the Canal and River Trust in collaboration with OPDC. This study outlines a coordinated vision, strategy, and implementation guidance to support the creation of an active canal community of residents, businesses and developers.• Canal and River Trust have a Code of Practice⁸⁶ that advises on stoppages to maintain navigation and good notice, so that permanent or visitor moorings are notified ahead of disruption.• The potential development of a new east-west bridge would require consultation and engagement with Canal and River Trust prior to consenting.• Visitors can moor for up to 14 days on the Grand Union Canal.• The narrow infrastructure and restrictions to developing on the water space can present constraints in the compliance of design (e.g. gradient of ramps).• Decisions on lighting provision need to balance light sensitivity for biodiversity and feelings of safety for vulnerable users and women on the tow paths at night.• Canal and River Trust identified themselves as a statutory consultee for future planning applications relating to Old Oak.

⁸⁵ OPDC (2019). Canal Placemaking Study. Available at: [Grand Union Canal Placemaking | London City Hall](#)

⁸⁶ Canal and River Trust (2024). Code of Practice: undertaking works affecting our property. Available at: [Undertaking works and code of practice | Canal & River Trust](#)

Stakeholder	Response or information provided
SSEN Distribution	SSEN Distributions identified that extra help and support is offered to customers that are eligible for the Priority Services Register, including disability (deafness, blindness), dependent children, chronic illness and over 60's. Residents and businesses affected by works at Old Oak that meet these criteria may register for priority treatment during planned or unplanned power cuts and emergency power supplies, especially if the customer relies on medical equipment that requires electricity.
Brent Council	Brent Council attended a Microsoft Teams meeting to share the latest information on the housing tenure split and social housing waitlist identified in section 4.3 . This included a demographic breakdown of protected characteristic groups of residents on the housing waitlist, including ethnic minority group, age and disability.
Ealing Council	Ealing Council provided projections for housing need across the Borough based on a Local Housing Needs Assessment undertaken in 2022 ⁸⁷ and further analysis undertaken at the end of 2023, as well as confirmation of social housing waitlist numbers.

⁸⁷ Ealing Council (2022). Ealing Local Housing Needs Assessment Update: Report of Findings November 2022. Available at: [Ealing Local Housing Needs Assessment update | Ealing Council](#)

7. Assessment of impacts

7.1 Introduction

This section provides an assessment of potential equality impacts associated with the regeneration of Old Oak for protected characteristic groups. This is based on the equalities baseline and key evidence and issues relevant to regeneration and equality groups outlined in the evidence and findings from the primary research.

The assessment considers the following potential equality effects of the following:

- **Direct Impacts** – These include potential direct impacts of the CPO on affected residential and commercial interests;
- **Indirect Impacts** - This includes where acquisition agreements have been made with affected residential and commercial interests, but residual impacts for protected characteristic groups may occur as a result of the acquisition; and
- **Wider Regeneration impacts** – The wider impacts of the regeneration on existing local residents, businesses, employees and visitors (not subject to acquisition or CPO).

These equality effects are assessed below using the assessment framework set out in **Section 2.3**, composed of key equality themes aligned with the SPD principles.

It is important to note that in some cases the number of businesses or households affected may be small (less than 10). In these cases, care has been taken to share information about potential equality impacts in such a way as to not disclose specific data about particular individuals.

7.2 Housing

7.2.1 Direct impacts of the CPO

Loss of homes for owner occupiers in the area

The potential CPO of residential interests on the site may result in the loss of homes for residential freehold owner occupiers and leasehold owner occupiers. OPDC intends to negotiate the purchase of residential interests prior to the regeneration of Old Oak, however compulsory purchase powers may be required to acquire properties that do not reach agreement. The acquisition of these interests could negatively impact the one known owner occupier who will experience loss of home on the site.

According to the land assembly summary as of June 2025, the known owner occupier remains within the Order Land and they are yet to reach agreement for acquisition. There is potential for additional owner occupiers within the Order Land, however the status of all properties was not confirmed at the time of writing.

Owner occupiers are likely to hold a higher degree of attachment and investment into their property and the local area. Groups that could be particularly sensitive to the impact of loss of home and the need to relocate include people from ethnic minority groups, older people, disabled people, families and low income households. These groups may be more reliant on local facilities as well as formal and informal support networks and social ties, including family and friends.

Some owner occupiers may have difficulty in securing a similar property in the area, in other preferred areas or in the new development at an equivalent cost to their current property. This may force some owner occupiers to move out of the area. Others may have no option but to join the private rental sector if they are unable to find an affordable equivalent home. Further adverse impacts may be experienced by older people, those with low incomes as well as some non-UK born residents or residents from religious groups who may find it difficult to transfer mortgages or apply for a new mortgage on a new property.

Homeowners may also encounter unplanned relocation expenses due to the compulsory purchase of their property. These costs can include moving services, transportation, storage fees, and sometimes temporary housing and could disproportionately affect low-income households. Those with mobility

restrictions such as elderly and disabled residents may need additional non-financial support to help with moving.

The primary research undertaken for the EqIA has identified directly affected residents that have one or more of the protected characteristics identified above as sensitive to the loss of homes. Therefore, the needs and requirements of these groups in the CPO process need to be considered including the types of financial and non-financial support that are suitable for relocation and minimising disruption of the CPO.

The Land Assembly and Relocation Strategy⁸⁸ outlines the acquisition activities OPDC have implemented with affected residents within the Order Land. This includes adherence to the CPO compensation code in offering eligible homeowners whose interests are acquired pursuant to a CPO compensation calculated in respect of land acquired. Further, a designated OPDC Officer will be allocated to engage with each resident and consider assistance on a case-by-case basis, including forward funding costs and flexibility on the timing of acquisition.

OPDC are in the process of appointing a Resident Friend⁸⁹. While not a legal requirement, OPDC have committed to funding this service in order to ensure independent advice is accessible for all affected residential interests. In particular, those unable to afford their own independent advisor and those who may be vulnerable or require assistance in understanding or navigating the legal and procedural complexities.

Recommendation: In addition to the activities within the Land Assembly and Relocation Strategy, it is recommended that OPDC develop a Residential Occupier and Engagement Strategy for internal use. This should outline the further financial, non-financial and professional support that will be available to owner occupiers included how affected residents can be signposted to professional support services and reimburse reasonable costs for professional advisors. Residents may also require support and information in different languages or formats.

The Residential Occupier and Engagement Strategy should also include details about how impacts on owner occupiers will be monitored throughout the relocation process. This should demonstrate financial and non-financial support provided and success of the relocation, as well as how direct engagement with owner occupiers will be undertaken in the long-term to measure successful relocation.

Once appointed, the Resident Friend should act as an intermediary and approach owner occupiers to provide professional advice on the CPO process, support representations and liaise with professional advisors on the residents' behalf.

Loss of homes for private renters

The potential for OPDC to need to use compulsory purchase powers to acquire residential interests on the existing site may also result in a loss of approximately 18 privately rented accommodations.

According to the land assembly schedule as of June 2025, one residential leasehold has been acquired and there are approximately 10 private rented properties within the Order Land that have yet to reach agreement. A further 7 leaseholders have been supported through relocation following the acquisition of a freehold for an apartment building. OPDC is actively undergoing discussions with remaining private renters in the area and providing support in identifying alternative accommodation that meets the requirements of the tenants.

There is potential for additional affected interests who are private renters within the Order Land. However, the residential status of occupiers for all properties was not confirmed at the time of writing. OPDC has committed to undertaking further surveys where new residential interests have been identified through changes to the Order Land and land assembly summary.

Privately rented properties include private tenants from protected characteristic groups including ethnic minority groups, older people, disabled people as well as households with children. These groups could be particularly sensitive to the impact of the CPO as they may lose important social and community ties if they need to move away from the area. These groups are likely to rely on local

⁸⁸ OPDC (2025). OPDC Board Meeting Minutes: Appendix 2 OPDC Land Assembly and Relocation Strategy. Available at: [\(Public Pack\)Agenda Document for OPDC Board, 05/02/2025 14:00](#) [accessed 20/05/25].

⁸⁹ A Resident Friend is an independent advisor appointed by OPDC that will approach residents subject to the potential CPO and offer support understanding the process and identify particular needs of residents in reaching agreement and relocating.

service and amenity provision, including transport links, shops, nurseries and schools, as well as formal and informal support networks. However, it is also recognised that this is a risk that already exists with shorthold private rental agreements.

Primary research with private tenants undertaken for this EqIA showed a preference to remain within the immediate neighbourhood or surrounding Boroughs of Brent, Ealing or Hammersmith and Fulham. However, relocation is dependent on the availability and affordability of private rental accommodation in areas that meet their needs.

Tenants may also face unexpected relocation costs associated with the CPO of residential properties, including moving assistance, transportation, storage fees and in some cases temporary housing between tenancies. These unplanned expenses may disproportionately impact low-income households as well as elderly and disabled people who may require additional assistance. The acquiring authority should consider mitigation for the potential financial strain of relocation.

The Land Assembly and Relocation Strategy⁹⁰ outlines adherence to the CPO compensation code for private rental units which are acquired pursuant to the CPO. These interests may be eligible for disturbance payment to cover reasonable expenses incurred as a result of the move. In addition to a designated OPDC Officer, short term “lease back” of property may be considered for private renters affected by acquisition.

Private renters will be entitled to the services of the Resident Friend previously mentioned, particularly those who may be vulnerable or require assistance understanding the legal procedures, as well as reimbursement of reasonable cost for professional independent advisors.

Recommendation: OPDC should maintain compliance with the compensation and support services outlined in the Land Assembly and Relocation Strategy.

It is recommended that OPDC develop a Residential Occupier and Engagement Strategy, which includes details of any additional financial compensation towards rent and relocation services, including hardship and affordability payments⁹¹, and support in finding a new property. Where required, information on relocation should support language and accessibility requirements for private renters.

OPDC should continue to identify the needs of tenants and work closely to identify specific needs in relocation properties and support. This may include the Resident Friend services acting as an intermediary and approach private renters to provide professional advice once appointed.

Loss of temporary accommodation currently leased by the Council

OPDC is negotiating with existing property owners to acquire freeholds and leaseholds by agreement prior to the regeneration of Old Oak. This includes a block of 21 temporary accommodation studios located on Old Oak Lane. These properties are owned by a Property Services Company and let to London Borough of Hammersmith and Fulham (LBHF). The accommodation provides temporary housing for residents at risk of homelessness whilst LBHF looks into other longer term housing options for these residents.

This temporary accommodation is occupied under a Private Licence Agreement, meaning that any licensee/s have been granted permission to stay in the property by LBHF, however they do not have the same legal rights as other housing tenants. For example, a licensee is only entitled to ‘reasonable’ notice to leave dependent on what is considered fair and adequate under the circumstances unless their agreement states otherwise. The acquisition of the property would result in a loss of temporary housing, potentially disproportionately negatively affect those from socio-economically disadvantaged backgrounds, refugees and asylum seekers and those who are at higher risk of homelessness such as young people and people from certain ethnic minority groups, as identified through the primary research conducted with residents.

The primary research also showed that the length of time living in the property (**Table 5-13**) was on average shorter than other residents of the area, however the majority indicated a preference to

⁹⁰ OPDC (2025). OPDC Board Meeting Minutes: Appendix 2 OPDC Land Assembly and Relocation Strategy. Available at: [\(Public Pack\)Agenda Document for OPDC Board, 05/02/2025 14:00](#) [accessed 20/05/25].

⁹¹ These payments are financial benefits provided to individuals and/ or families that are experiencing financial difficulties (hardship payments) or rising costs of living (affordability payments). These payments are intended to cover essential living costs, such as housing and utilities during the period of financial difficulty.

remain within the immediate neighbourhood or surrounding boroughs (**Table 5-16**). Frequent residential relocation has been associated with adverse socio-economic outcomes including labour market activities and health and wellbeing.⁹²

As of June 2025, OPDC has been engaging closely with LBHF as a key stakeholder in the Proposed Regeneration and have provisionally agreed terms to acquire the temporary accommodation units. .

Hammersmith & Fulham Council has an obligation under the main housing duty to provide temporary accommodation until such time as the duty is ended, either by an offer of settled accommodation or for another specified reason. As such the Council, will support occupiers to find suitable alternative accommodation and support relocation.

However, successful relocation will depend on the availability of temporary or low-cost accommodation that meets the needs of these residents within their preferred area. Suitable accommodation may not be available in the neighbouring Boroughs of Brent, Ealing or Hammersmith and Fulham and, as a result, residents may be displaced elsewhere in London or outside London. The planned regeneration of Old Oak seeks to unlock up to 8,000 new homes, including affordable homes. However, the extent to which vulnerable groups such as those living in temporary accommodation, will benefit from this is dependent on the provision of new housing that meets their needs and their own priority status on local housing waiting lists managed by the boroughs.

Recommendation: OPDC should consider how they can support LBHF in minimising any negative impacts on temporary accommodation occupiers as a result of acquisition. For example, supporting LBHF in avoiding homelessness through allowing occupancy of temporary accommodation units until the site is required for regeneration. Whether in partnership with LBHF or through an independent advisor, OPDC should also provide occupiers with clear and accessible information regarding the acquisition of the site, their rights with regard to relocation and clear signposting to the services provided by LBHF as the Housing Authority. This may require a Resident Friend specialising in outreach with homeless or vulnerable people.

OPDC should consider the need for translation services and providing information in different languages or format given there is a high percentage of ethnic minority groups living in the accommodation.

Loss of homes for Housing Association residents

Further to the residential properties required for the regeneration of Old Oak and potentially subject to CPO mentioned above, there is also two known properties owned and managed by social housing associations (Peabody Trust and Notting Hill Genesis). This could potentially result in the loss of homes for social rent in the area and the displacement of existing housing association residents.

As of June 2025, OPDC is currently engaging with the affected housing associations and their tenants. OPDC has also committed to undertaking additional surveys where new residential interests have been identified through changes to the Order Land and land assembly summary to attempt to determine any specific equality impacts. These activities will also aim to identify appropriate mitigation measures and actions to minimise negative impacts on tenants.

Social housing tenants are more likely to have low household incomes and rely on social housing for affordable rent. Options for securing new housing may be more limited than for those who are able to afford higher rents or to buy property in their preferred area. Families with children, older people and disabled people may have specific needs with regards to accommodation, including number of bedrooms, accessibility adaptations and security or support measures. Ethnic minority groups, older people, disabled people and families may rely on informal or formal support networks locally as well as local schools, healthcare and community facilities. Moving to a new home may also disrupt existing benefit arrangements and result in loss of household income on a temporary or permanent basis. Some residents, such as older people and disabled people, may have greater difficulty in moving due to health issues or mobility restrictions.

⁹² Jiang, N., Pacheco, G. & Dasgupta, K. Understanding the transient population: insights from linked administrative data. *J Pop Research* **36**, 111–136 (2019). Available at: [Understanding the transient population: insights from linked administrative data | Journal of Population Research \(springer.com\)](https://doi.org/10.1007/s11266-019-00000-0)

As a social housing landlord, the affected housing associations are considered as public authorities.⁹³ Therefore, they also must pay due regard to PSED in relations to their decisions during land acquisition. Tenants will also be covered by housing association policies with regards relocating to a new home. For example, Peabody has an Alternative Accommodation (Decants) Policy⁹⁴ in place which sets out their approach to rehousing residents in alternative accommodation. Notting Hill Genesis has Relocation Policy⁹⁵ which sets out the approach to relocating tenants when they are required to move from their home due to the sale of their property.

Recommendation: Depending on individual tenancies, tenants may be eligible for home loss payments or disturbance payments. Engagement with Housing Associations should seek to identify the level of support being provided to tenants and identifying where further support may be needed directly from OPDC to provide successful relocation of tenants.

7.2.2 Wider regeneration impacts

Net increase in housing provision in Old Oak

The CPO would enable acquired land to be available for the purposes of the Proposed Regeneration. This includes unlocking up to 8,000 new homes, with a target of 50% affordable housing of which 60% is targeted to be social housing (i.e. social housing will comprise roughly 30% of the total new homes provided). A net increase in homes is anticipated to meet the demand of an expanding population, with population growth at Old Oak exceeding London and the wider national growth in recent years.

Additionally, the plans in the SPD include:

- 25% of properties to be family housing - it is considered that an increase in the provision of housing suitable for families would also have a positive impact for children.
- Co-living, shared housing and student accommodation – all of which provide increased options for younger people and those on low-incomes to live in the area;
- Wheelchair accessible housing - providing options for people with disabilities. Also, the population aged 65+ is projected to increase significantly over 20 years across all boroughs. An increase in the number of elderly people will require appropriate housing that meets their needs. Housing implications include increased demand for both specialist accommodation for older people and for services and home adaptations to enable older people to remain 'at home' living independently.
- All new residential properties to conform to modern 'lifetime homes' standards in line with the London Plan, which means they are more suitable for adaptation throughout the span of residents' lives.
- Affordable housing which could be provided as:
 - Homes for Intermediate rent, shared ownership or Discount Market Sale - this a type of affordable housing targeted at individuals who struggle to afford market rent and do not qualify for social rent. Specific groups with high needs for access to housing and high representation amongst those living in Old Oak include people from minority ethnic groups, elderly people and younger age groups. These groups could particularly benefit from new housing associated with the Proposed Regeneration, except where affordability barriers could limit these opportunities.⁹⁶
 - Social housing - is provided by local councils to local residents who register to the social housing waitlist. Addressing the needs of those on the social housing waitlist is crucial for addressing housing inequalities and ensuring fair allocation of resources. Within the surrounding Boroughs of Brent, Ealing and Hammersmith and Fulham an estimated 42,500 residents are on the housing register. The provision of affordable

⁹³ Disability Rights UK (no date). London and Quadrant Housing Trust. Available at: [R \(Weaver\) v London and Quadrant Housing Trust \[2008\] EWHC 1377 \(Admin\); \[2008\] WLR \(D\) 207 | Disability Rights UK](#)

⁹⁴ Peabody (2023). Policies and insurance. Available at: [Policies and insurance - Peabody](#)

⁹⁵ Notting Hill Genesis (2024). Relocation (Decant) policy. Available at: [relocation-policy-v20-16012024-1.pdf](#)

⁹⁶ Human City Institute (2017) Forty Years of Struggle: A Window on Race and Housing, Disadvantage and Exclusion <https://humancityinstitute.files.wordpress.com/2017/01/forty-years-of-struggle.pdf>

homes for social rent is a benefit that can be shared by those with protected characteristics who are typically overrepresented on the social housing register, particularly low-income households and ethnic minority groups.

The groups mentioned above particularly stand to benefit from new housing associated with the regeneration, except where affordability barriers could limit these opportunities. In particular, new private housing in the area may be beyond the means of many local residents. Primary research undertaken for this EqIA highlighted a concern amongst residents that the new affordable housing may not be truly affordable. Where intermediate rent is provided, it is recommended that this should include a mix of lower rental quartile and London Living rent⁹⁷ to help to make it more affordable to local people.

The demand for social housing currently exceeds supply, resulting in long wait times for successful applicants. The wait times for larger family-sized homes, such as 4-bed and 5-bed units, are the highest across all the priority bands, highlighting a shortage for these types of accommodation. These demographic and demand trend highlights the need for targeted policies and interventions to address the specific housing needs of these communities, ensuring that the allocation process is equitable and responsive to the needs of vulnerable and protected residents.

There is also an on-going need to provide more settled accommodation for homeless households. There may be an opportunity for the regeneration to help address the needs of vulnerable people in the area through suitable housing and other forms of support, which may benefit people belonging to certain protected groups including young people.

While the provision of new homes positively contributes to establishing a thriving new community, there is still a need to safeguard existing residents, especially those with specific needs such as the gypsy and traveller community. OPDC have recognised the importance of this and Bashley Road Gypsy and Travellers Site has been safeguarded within the SPD.

As of June 2025, OPDC have published a Regeneration Strategy that outlines a commitment to delivering new and affordable homes, including a mix of housing types and tenures to complement to diversity of the area and maximise affordability such as family homes and homes for later living.

Recommendation: OPDC should develop housing strategies/ policies, such as a Local Lettings Plan (LLP), in collaboration with the local boroughs for the new additional affordable housing supply. This should aim to prioritise local people especially those in the most need and be subject to consultation with these groups.

Potential increase in house prices and private rents

The Proposed Regeneration has the potential to increase residential property and rental prices as a result of improvements to the area. Old Oak aims to become a new urban district with an enhanced public realm and Canalside with commercial space, new homes and new high streets including shops, cafes and restaurants. This could increase the attractiveness of Old Oak as a neighbourhood and simultaneously increase the cost of living and widen the affordability gap.

While there is no explicit evidence that house prices will increase as a direct result of the Proposed Regeneration, primary research undertaken for this EqIA reveals contrasting views on rising house prices across indirectly affected residents. Some of the younger respondents (aged 18-35) expressed concern that increasing house prices would make the regeneration unsuccessful. This age group typically comprise first time buyers who may become priced out of the local housing market and be forced to move away from local family and community ties. While other respondents perceived the potential increase in house prices as an improvement to the Old Oak area. This perspective may reflect the potential benefits on current home owners whose property could increase in value as a result of the Proposed Regeneration.

⁹⁷ London Living Rent levels are derived from average local incomes and ward-level house prices using a multi-stage process. Broadly, the rent for a 2-bedroom property is based on one-third of the local median household income, and across London as a whole comes to around £1,030 a month, or two thirds of the median monthly market rent in London of £1,500 reported by the Valuation Office Agency for 2018/19. Rents for LLR homes vary according to their number of bedrooms. Using the two-bedroom rents for each ward as a benchmark, the rent for a 1-bedroom home is 10% lower, for a 3-bedroom home 10% higher and for a 4-bedroom home 20% higher. As a final affordability safeguard, the rent for any individual unit must be at least 20% below its assessed market rent. <https://www.london.gov.uk/programmes-strategies/housing-and-land/improving-private-rented-sector/london-living-rent>

Similarly, improvements to the local area could generate higher residential rents and higher costs of living. This could result in non-traditional households ('sharers') or circumstances where more than one household may have to live within the same property and, in some cases, low-income groups who can no longer afford to stay in their current neighbourhoods may have to relocate. While all groups could be affected, this is likely to have a disproportionate impact on young people, ethnic minority groups, large family households and low-income households. The negative impacts of gentrification are often felt disproportionately by ethnic minority groups, who may have fewer options for relocating and retaining community cohesion than their white counterparts and compose the largest ethnic group within Old Oak.⁹⁸

The aforementioned Regeneration Strategy outlines OPDC's aim to deliver a range of homes and maximise affordability in the rental and housing market. The Strategy also highlights the ambition to maximise public investment in affordable and supported housing to optimise the positive impacts realised by the Proposed Regeneration for the local community.

Recommendation: OPDC should consider opportunities for local people to benefit from the availability of new homes in the area, including affordable, family and specialist housing.

Changes to the urban landscape

The Proposed Regeneration includes plans for buildings at increased heights across the area. This change to the urban landscape may result in a loss of light on neighbouring residential properties. Some change in existing light levels- as part of urban regeneration- is likely inevitable if the Proposed Regeneration is to deliver adequate new homes. However, these potential impacts will be dependent on the height parameters and location of new residential units

For properties which do experience a loss of light as a result of the Proposed Regeneration, equality effects may arise where a resident is more sensitive than other people, due to protected characteristics. Individuals who spend more time at home could experience longer periods of exposure to changes in light, such as older people, people with disabilities and long-term limiting illnesses and pregnant women/ women on maternity or those caring for small children. The privacy of local residents may also be compromised should their property be overlooked by any new housing.

The acceptability of the above potential impacts will be considered through the planning process through the preparation of supporting assessment work.

Recommendation: The design and placement of new homes should respond appropriately to the urban context with minimal effects to the majority of neighbours. A Daylight and Sunlight Assessment should be undertaken to calculate the potential change in light levels between the existing development and proposed development on neighbouring buildings. In order to minimise any shift in light levels and balance neighbours' loss of light while maximising housing delivery, the proposed design of new housing should consider limiting building height, maximised separation distances and setting back the tallest elements of the scheme.

7.3 Employment, skills and training

7.3.1 Direct impacts of the CPO

Business closure/ non-viability of business

To facilitate the Proposed Regeneration, OPDC is looking to acquire approximately 35 businesses. Where possible, OPDC is negotiating to acquire these freeholds and leaseholds prior to regeneration. However, the CPO process may result in the compulsory purchase of business interests that do not reach agreement. The use of compulsory purchase powers could result in involuntary closure or relocation of these businesses.

According to the land assembly summary as of June 2025, OPDC has acquired the freehold for approximately 15 business units and are engaging with the remaining business interests to agree terms for acquisition.

⁹⁸ Stanford Report (2020). Stanford professor's study finds gentrification disproportionately affects minorities. Available at: [Gentrification disproportionately affects minorities | Stanford Report](#)

There is potential for additional business interests to be included within the Order Land, however the status of further interests was not confirmed at the time of writing. OPDC has committed to undertaking further surveys where new residential interests were identified through changes to the Order Land and land assembly summary as of June 2025.

Equality effects can be experienced where the pattern of affected business owners or employees affects a single ethnic group, or other patterns in terms of protected characteristics, including effects of changes to clustering of businesses offering services to a common customer set. Of the business owners/ managers that responded to the primary research, 62.5% were from non-white ethnic minority groups and 43.8% were from religious minority groups. Thereby, there may be sensitivities around minority groups experiencing disproportionate negative impacts as a result of the potential CPO.

Primary research undertaken for this EqlA identified some concerns that the cost of relocating and losing a local customer base would have implications for the future viability of their business. Some businesses may not feel confident that their business could be setup elsewhere because they rely on local customer bases, especially those identified as catering for people from the same shared cultural, religious or ethnic background. Businesses expressed a preference to relocate within the immediate neighbourhood (56.3%) or elsewhere within the OPDC area (18.8%) which may reflect this dependence on a local customer base, as well as 20% identifying the customer base and community connections a main benefit of currently working in Old Oak.

The ability to cover the financial cost of moving commercial spaces and find alternative affordable rental units could also influence business closure rather than relocation. In particular, smaller independent businesses may struggle to absorb the financial impact of relocation while establishing a new customer base. While not all of the potential direct business interests were captured in the primary research undertaken for this EqlA, of the businesses that responded, the majority were independent businesses (over 80%) and had been operating for over 10 years (56.3%), thereby disproportionate loss of livelihood for business owners/ managers may be experienced across Old Oak.

At this stage, the availability of new commercial units that could be available for relocation within the Proposed Regeneration has not yet been determined, although it is anticipated that around 150,000 – 200,000 sqm of new space will be available for commercial purposes. However, primary research highlighted the concern of existing businesses being priced out of the area as a result of regeneration increasing the attractiveness of Old Oak as a business destination.

For businesses interests yet to agree terms for acquisition, OPDC should adhere to the CPO compensation code which will provide eligible businesses acquired pursuant to the CPO with financial compensation to cover costs of land and other related costs. OPDC are exploring the early release of these compensation payments where required. These payments are typically only paid after vacant possession is provided and therefore employing a policy to make payments to those eligible in advance of needing to vacate could be used to support a successful relocation i.e., to pay deposits, fund relocation expenses, etc.

The Land Assembly and Relocation Strategy⁹⁹ sets out activities that OPDC has been implementing for businesses within the Order Land. This includes assigning a Business Engagement Officer to each business as the principal point of contact for supporting through acquisition and relocation. OPDC has also identified of alternative business units to help retain local businesses and jobs within the area or the wider West London region where the needs of the current business are met. The Strategy outlines that OPDC may also need to collaborate with businesses to support relocation elsewhere in London or beyond if that better aligns with their operational needs. OPDC also have an internal toolkit to help guide officers through the business acquisition process.

Recommendation: OPDC should continue to adhere to CPO compensation and relocation support through implementing the Land Assembly and Relocation Strategy across all businesses within the Order Land.

⁹⁹ OPDC (2025). OPDC Board Meeting Minutes: Appendix 2 OPDC Land Assembly and Relocation Strategy. Available at: [\(Public Pack\)Agenda Document for OPDC Board, 05/02/2025 14:09](#) [accessed 20/05/25].

Temporary or permanent loss of employment following closure or relocation of businesses

Without appropriate or affordable relocation opportunities, the CPO may result in the closure of businesses where they are unwilling or unable to relocate, with associated loss of employment. Employees and self-employed workers at affected businesses may experience temporary or permanent loss of employment and income until relocated or where the employer closes, downsizes or relocates elsewhere.

Negative equality effects may arise where affected employees disproportionately share a protected characteristic group or have other protected characteristics which make them more sensitive to the Proposed Regeneration. Primary research findings show that every business had employees, the majority of which employed between six and ten people and are from ethnic minority groups. The temporary or permanent loss of employment is also particularly important for any family-run businesses, where more than one member of the family work for the business and could experience a loss of livelihood as a result of the regeneration.

The potential for equality effects is dependent not only on the business's viability in relocation, but also whether the new location is appropriate and accessible for employees. For example, primary research identified the beneficial transport links at Old Oak which provide well-connected and low-cost access for employees, especially those without access to a private vehicle. Therefore, premises for relocation may need to consider how accessible they are for employees.

The aforementioned Land Assembly and Relocation Strategy¹⁰⁰ outlines OPDC's activities with business interests, including identifying alternative business units and prioritising local businesses and jobs within its area. Eligible businesses are also entitled to a Business Engagement Officer that supports business owners and employees with acquisition and the potential CPO process.

Recommendation: The potential negative impacts on affected employees can be mitigated against by providing support to businesses to enable successful relocation through the Land Assembly and Relocation Strategy as well the development of a Skills, Education and Employment Plan (SEE Plan) which identifies employment opportunities for those affected by the CPO. In addition, any employment opportunities created through the regeneration should be accessible to all and promoted through a variety of channels to attract a diverse workforce.

7.3.2 Wider regeneration impacts

New employment and training opportunities during construction

The Proposed Regeneration brings with it the opportunity for new employment and training opportunities including construction-related jobs. Construction employment opportunities could cover entry-level jobs, skilled trades and technical and specialised roles.

The groups who benefit from this new employment may vary considerably depending on the type of jobs and training available. Equality effects may arise where training or employment is not available to groups with protected characteristics, for example if jobs require high skill/ education levels which made it harder for some groups to access the opportunities. However, the area has high levels of unemployment and low levels of educational attainment and as such there is potential for those seeking work to benefit from new employment opportunity this includes those groups who are overrepresented in local unemployment figures for example younger people and those from ethnic minority backgrounds, particularly young black people.¹⁰¹

The allocation of employment opportunities during construction should be informed by the equality priorities outlined in **Table 3-1** for OPDC and the surrounding Boroughs of Brent, Ealing and Hammersmith and Fulham.

¹⁰⁰ OPDC (2025). OPDC Board Meeting Minutes: Appendix 2 OPDC Land Assembly and Relocation Strategy. Available at: [\(Public Pack\)Agenda Document for OPDC Board, 05/02/2025 14:00](#) [accessed 20/05/25].

¹⁰¹ ONS (2022). Annual Population Survey: Unemployment. Available at: [Unemployment - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](#)

Procurement policies should include employment targets including local people affected by the regeneration plans and construction and underrepresented groups including minority ethnic groups and young people.

The area is in one of the top 10% most deprived for deprivation in regard to employment and income with over 80% of the Lower Super Output Areas (LSOAs)¹⁰² in the area being in the top 10% most deprived nationally overall. The opportunities created through a large-scale regeneration project can help to train upskill local people and support employment opportunities in the longer term.

Groups that are overrepresented in unemployment figures locally include young people and especially those from Black ethnic groups. A focus on training and upskilling these groups may help to reduce unemployment in the future.

Recommendations: A plan/ strategy to address skills, employment and education issues should be developed by OPDC working with local partners (Job Centre/developers etc.) to enable existing employees and local people to benefit from job opportunities arising through the regeneration works.

For instance, an assessment of surrounding construction training facilities against the programme of works and considering equality of opportunity could be undertaken to determine the demand for a standalone Construction Skills Centre in North Acton led by Ealing Council and supported by OPDC.

Local schools and colleges should be identified within the SEE Plan to provide a platform for career days, talks, and apprenticeship programs that could offer students practical insights into various career paths within the construction industry and contribute social value through fulfilling multiple job and apprentice opportunities with local residents. This would require a commitment from OPDC to consult and engage with the local community, including with local schools and education providers, to inform residents and promote skills and employment opportunities. This opportunity not only benefits students by broadening their career prospects but also strengthens the relationship between the construction project and the local community, promoting inclusivity and long-term positive impacts.

A Responsible Procurement Plan should also be developed to ensure that developers and contractors commissioned by OPDC are adhering to OPDC employment policies and that local residents are given priority for construction jobs and training, where appropriate.

New employment opportunities in the new commercial space

The Proposed Regeneration brings with it the opportunity for new employment, including jobs in commercial space on site covering a range of sectors and skill levels. Young people and those from Black African and Black Caribbean ethnic groups who disproportionately experience higher rates of unemployment may have the potential to benefit from these opportunities.¹⁰³

The groups who benefit from this new employment may vary considerably depending on the type of business and associated training. Equality effects may arise where employment or training is not available to groups with protected characteristics, for example where procurement, including recruitment policies, make it harder for some groups to access the opportunities.

7.4 Neighbourhood and community

7.4.1 Direct impacts of the CPO

Loss of commercial services for local customers due to closure of businesses

The loss of existing businesses providing goods and services at the existing site is expected to affect customers and users of services.

In the primary research, almost half of the businesses who responded (46.7%) stated that most of their customers are from the local community. While this does not represent all of the affected

¹⁰² ONS (2023) Lower layer Super Output Areas (LSOAs) are made up of groups of Output Areas (OAs), usually four or five. They comprise between 400 and 1,200 households and have a usually resident population between 1,000 and 3,000 persons. Available at: [Area type definitions Census 2021 - Office for National Statistics](#)

¹⁰³ ONS (2022). Annual Population Survey: Unemployment. Available at: [Unemployment - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](#)

businesses, it highlights the potential for customers to experience a change in businesses available to the local community. Equality effects may be experienced when there are patterns in terms of affected customers and their protected characteristics. According to primary research findings, 40% of businesses feel that their business provides goods or services that serve the needs of people from a shared ethnic background and 33% with a shared religious identity. The effects on this ethnic group may include changes associated with a sense of belonging and cultural connections. The loss of these facilities could have an adverse impact in cases where the service is not relocated nearby or where there is no nearby alternative.

However, there are some businesses that are not open directly to customers and operate as warehouses or offices that are expected to generate negligible impacts for local customers as a result of relocation.

Many respondents to the primary research felt that the positives of the regeneration would be the addition of new commercial services in the area including retail and leisure opportunities. The new commercial provision is likely to result in increased number of businesses for locals to choose from as well as customers who want to shop and visit the area, therefore benefitting existing businesses and providing better facilities for customers.

The Land Assembly and Relocation Strategy¹⁰⁴ outlines that OPDC will prioritise the retention of local businesses and jobs within its area or the wider West London region. Further, OPDC have published the Old Oak Regeneration Strategy and Illustrative Masterplan that outline the six regeneration proposals and spatial principles based on feedback received during previous rounds of public consultation.

Recommendations: Continued and effective engagement with the local community, including through public consultation on the Illustrative Masterplan, should assist in identifying the needs of residents in terms of goods and services.

Preservation of existing social space

To facilitate the Proposed Regeneration, OPDC may need to acquire the freehold for a business interest which currently provides a social space used by a particular ethnic minority group. According to OPDC officials as of June 2025, OPDC plan to retain this social space within Old Oak as part of the regeneration and support the business owner in unlocking positive impacts of the Proposed Regeneration.

As a result, OPDC are actively seeking engagement with the business owner regarding the potential acquisition of the property prior to making the CPO. At this stage, the extent of this direct impact is unknown and will be monitored going forward.

Recommendation: It is recommended that OPDC continue to seek engagement with the business owner directly to understand the needs of this social space in the future regeneration and agree terms of acquisition that allow continued use of the service by the ethnic minority group that it currently serves.

7.4.2 Indirect impacts

Loss of community centre serving the Muslim community

OPDC requires a commercial property interest currently being used as a community centre to facilitate the Proposed Regeneration. As of June 2025, OPDC is in the final stages of agreed acquisition of the property. Although the interest will be included within the CPO, it is expected that that by the time of making the CPO that the acquisition will be completed. As such, the loss of the community centre is being considered as an indirect impact for the purpose of the EqIA.

OPDC has agreed terms with the freeholder and has offered assistance to find an alternative site for the community centre. However, the offer of relocation assistance has been declined and instead, the owners have agreed to lease back the interest until the time at which it is required for regeneration.

¹⁰⁴ OPDC (2025). OPDC Board Meeting Minutes: Appendix 2 OPDC Land Assembly and Relocation Strategy. Available at: [\(Public Pack\) Agenda Document for OPDC Board, 05/02/2025, 14:00](#) [accessed 20/05/25].

The community centre is not a place of worship but provides services for the Muslim community. For example, Eid celebrations and other religious services such as weddings have been held at the premises upon request. The community centre is operated by a social enterprise that advertises the provision of health and educational services such as a segregated gym, steam and sauna rooms, as well as a creche for childcare while parents use the facilities. The centre also advertises educational courses for children including Quran memorisation and Halaqa classes. Therefore, the loss of the community centre could disproportionately negatively impact on members of the Muslim community who are highly represented in the area.

Recommendation: It is acknowledged that the Proposed Regeneration will provide space for a range of new community facilities and aims to be inclusive and meet the needs of people living in Old Oak. OPDC will continue to engage the local community to identify needs and priorities for the regeneration of the area. This should include targeted engagement with users of the community centre to understand how they use current services and how their needs can be met within new community facilities as part of the wider regeneration proposals.

7.4.3 Wider regeneration impacts

Community engagement and participation

Equality legislation emphasises the importance of supporting positive relations between different groups, whilst local community cohesion policy supports group interaction, fair treatment, equal opportunity, and a sense of common belonging, including empowering local communities to shape decisions affecting their lives.

Old Oak is an area of deprivation and among the top 10% most deprived nationally, creating a range of community needs. The extent to which benefits of the Proposed Regeneration will be shared amongst all members of the community, including groups with protected characteristics, will depend in part on engagement efforts to include their views in the planning process.

OPDC has published a Regeneration Strategy¹⁰⁵ outlining the official regeneration offer for Old Oak. This Strategy has been shaped and informed by consultation undertaken to date. Local drop-in events have been hosted at Oaklands Rise on the 22nd August and 19th September 2024 to provide more information and visuals to showcase the emerging regeneration principles and demonstrate how feedback from engagement to date is shaping the plans. To advertise these drop-ins and the Proposed Regeneration more widely, OPDC published an Old Oak Community Newsletter in August 2024 outlining the regeneration area, key facts and emerging principles for re-imagining Old Oak. The Regeneration Strategy and Ideas Book – where local artists create illustrations of what Old Oak may look like in the future – were identified as future commitments to be published at a launch event for the local community.

OPDC have also published an Illustrative Masterplan outlining the spatial principles for Old Oak. Stakeholder and public consultation on the Illustrative Masterplan took place from 17th-22nd May 2025 in the form of local drop-in sessions and an online event.¹⁰⁶

Throughout the regeneration process continuous and effective engagement and consultation will need to be undertaken with affected parties and local residents. Young people, ethnic minority groups and those from the LGBTQ+ community can often face barriers to taking part in engagement processes effectively and therefore may be underrepresented in such activities.

Recommendation: Community engagement should be ongoing and may benefit from the establishment of a local Community Forum or Working Group as a collaborative platform where community members come together to discuss, plan and address local needs and issues. This could include group specific meetings or events to encourage those from underrepresented groups or those with particular needs such as young people and / or older people.

¹⁰⁵ OPDC (2025). OPDC Regeneration Strategy. Available at: [OPDC Regeneration Strategy | London City Hall](#) [accessed 20/05/25].

¹⁰⁶ OPDC (2025). Old Oak: Illustrative Masterplan. Available at: [Old Oak | OPDC have your say](#) [accessed 20/05/25].

Provision of new urban centre with new facilities and services

The Proposed Regeneration aims to deliver a new urban district in Old Oak, including a new high street with shops, cafes, restaurants and local services and amenities such as a new leisure centre, health centre and primary school. This will likely benefit existing and new businesses and residents in the area, as well as the local and wider community should the new facilities serve the community more appropriately than the existing provision of facilities. The extent to which these benefits are shared by those with protected characteristics will depend on the mix of type and usage of shops, businesses, and facilities on offer.

The Proposed Regeneration is expected to provide space for businesses - and local business could potentially benefit from this by being able to upgrade and modernise their business space, especially where specialist equipment and fit out may be required.

Currently, residents expressed through the primary research undertaken for this study that Old Oak has a low provision of services, including good schools, transport links to schools and no shops within walking distance. Some respondents, especially younger people expressed concern that there is not much to do in the local area because there are limited social activities and venues available, in particular a lack of social meeting places such as pubs and restaurants.

Businesses also commented that the local area feels secluded with no passing trade for businesses. The majority of businesses and residents were supportive of the provision of new services and amenities, especially shops, schools, cafes and restaurants. Respondents felt that the Proposed Regeneration would improve the quality of the area and Old Oak could begin feeling like a 'proper neighbourhood'. For businesses, regeneration could increase footfall and expand customer bases, while children and young people could experience enhanced equality of opportunity through the provision of a new primary school, transport links and parks to socialise. Primary research also highlighted that Old Oak may become more social and integrated, which could particularly benefit elderly or disabled residents and visitors who are more vulnerable to social isolation.

Wider health and wellbeing services, such as GP surgeries, dentists and medical care should be provided in proportion to the projected population of the new site or provision made for the expansion of existing services. Primary research findings revealed concerns amongst residents that infrastructure and services established through the regeneration would not meet the demand of the new population and the growing community would 'outgrow' the new amenities. Therefore, careful consideration and planning for the projected population should be undertaken to ensure new services and amenities can meet demand. This may include working alongside health and wellbeing boards/management to ensure an adequate distribution of services.

Recommendation: It is recommended that the implementation of the Regeneration Strategy has regard to the recommendations in this EqlA and that it should draw upon the evidence of direct and indirect impacts identified within this report.

7.5 Health and wellbeing

7.5.1 Direct impacts of the CPO

Uncertainty and anxiety for existing businesses and residents

The potential for OPDC to use compulsory purchase powers to acquire properties and require existing businesses and residents to seek new accommodation could impact the mental health and wellbeing of affected parties.

Primary research undertaken for this EqlA highlighted anxieties and concerns with regard to the Proposed Regeneration including uncertainty over regeneration plan. Directly affected business interests expressed concern about the viability of their business as a result of relocation, including relocation costs and loss of customers. The findings also revealed that the majority of business tenants have resided in the area for over 10 years, therefore felt well-established within the local area. The process of finding alternative commercial units and relocating may be stressful and impact individuals' mental health and wellbeing, especially where businesses may require specialist equipment or interior layouts in order to operate that makes relocating challenging.

Primary research undertaken for this EqlA further identified that directly affected residents felt anxiety around moving their lives elsewhere and losing their homes, especially amongst owner occupiers and private renters. For these longer-term tenants, moving to a new area could result in major adjustment and result in some uncertainty. Residents may also experience difficulty finding a new home that meets their needs, especially if the household comprises dependent children, elderly or disabled people.

However, the primary research for this EqlA revealed that the majority of residents have resided in the local area for up to 2 years. These short-term tenancies are mostly held by temporary accommodation tenants directly impacted by the potential CPO. It is understood from primary research undertaken for this EqlA that these residents already experience stressors associated with their living conditions and circumstances. These may be heightened by the uncertainty of their relocation.

Equality legislation emphasises the importance of supporting positive relations between different groups, whilst promoting community cohesion that supports group interaction, fair treatment, equal opportunity, and a sense of common belonging, including empowering local communities to shape decisions affecting their lives. Throughout any potential CPO process continuous engagement and consultation would need to be undertaken with affected parties.

Currently, OPDC is negotiating with freeholders and leaseholders of affected properties. Where properties have been acquired with existing tenancies, OPDC has been in contact with the tenants to introduce themselves as the landlord. Where businesses have a protected use or have requested the support of OPDC in relocation, OPDC is engaging with the party directly to identify alternative commercial space.

Recommendation: In order to minimise the potential mental health and wellbeing impacts experienced by affected interests, OPDC should continue active engagement and proactively offering appropriate support to tenants with any housing or commercial issues. This should include adhering to Relocation Strategies and ensuring the appointment of independent advisors, including the Residents Friends and Business Engagement Officers.

Potential loss of visitor's car parking spaces

To facilitate the Proposed Regeneration, OPDC may use compulsory purchase powers to acquire a small extent of the car park currently serving Shaftesbury Gardens residential estate.

As of June 2025, the area of the car park that may be subject to compulsory purchase comprises spaces reserved for visitors. Equality effects may arise where elderly residents, disabled residents or those with a long-term health condition rely on visitors to provide health care services, such as support and care workers. These potential equality impacts may be exacerbated by the minimal and restricted parking available in the surrounding area and may result in longer distances between available car parking spaces and the Shaftesbury Garden residence being visited.

Recommendation: It is recommended that OPDC seek to engage with the residents of Shaftesbury Gardens to understand the usage of these visitor parking spaces and the potential impact of removing these. OPDC may also explore the potential for alternative parking arrangement for those affected.

7.5.2 Wider regeneration impacts

Net increase in accessible open and green space

The Spatial Vision for Old Oak illustrates a network of green, accessible and healthy streets and parks that provide a place for people to meet and interact.¹⁰⁷ The Proposed Regeneration plans to deliver an improved public realm including parks and green space, and high-quality publicly accessible space. The high-level plans for the Proposed Regeneration include up to 20 acres of high-quality publicly accessible open space and 6 acres of parks and green space. These enhancements will provide a net increase in green and open space for local residents. There is widespread recognition of the positive association between physical and mental health (both self-reported and objectively

¹⁰⁷ OPDC (2024). Old Oak West Supplementary Planning Document. Available at: [Old Oak West SPD Part1 \(14\).pdf](#)

measured) and living environments that are greener or comprise more open space.¹⁰⁸ In particular, access to open spaces in urban environments is highlighted as having positive wellbeing effects for older people and people experiencing disabilities through increasing opportunities for social interaction.¹⁰⁹ Primary research for this study further highlighted residents' views that increased open space and a more social local environment would improve the area of Old Oak through regeneration.

There are also plans for the Proposed Regeneration to promote and increase active travel networks which in turn could result in more journeys by walking and cycling in the area, resulting in increasing levels of physical activity and cleaner air. These are benefits that can be shared by protected groups who are more vulnerable to poor health through lack of physical activity.

Equality impacts may arise where users are more sensitive to urban and public realm design, due to protected characteristics, in particular disabled people who have certain accessibility and mobility requirements. Public spaces often lack features such as ramps, tactile paving and accessible restrooms which make navigating the area challenging for people with mobility impairments. Inaccessible design limits the independence and participation of these individuals in everyday activities, which may perpetuate social exclusion. These equality effects may also be felt by elderly people and those with young families and pushchairs. Therefore, designing inclusive public spaces fosters a more equitable and welcoming environment for everyone.

According to the land assembly summary as of June 2025, OPDC are looking to acquire additional plots of inaccessible open space and shrub land with the purpose of improving these for public access. This includes the open space located adjacent to TfL's Crossrail depot on Loverose Lane that is not open to the public.

Recommendation: In order to create a more inclusive process, OPDC could implement a Community Engagement Plan that involves local and prospective residents in the planning and design of the new landscaping spaces. Such a Plan could include workshops and feedback sessions to ensure that the spaces meet the specific needs and preferences of the community.

Recommendation: To provide a consistent approach to accessing public space, inclusive design principles should be identified from the start of the design process. These principles need to accommodate the diverse needs of all individuals, particularly those with disabilities. Effective consultation and engagement with the key user groups identified above could highlight lived experience and inform the development of these principles in practice.

Provision of enhanced Canalside

The Proposed Regeneration aims to enhance 1km of the Grand Union Canal and its towpath to improve the walking, cycling and boating links to central London and the Midlands. This is expected to create a vibrant, accessible, and inclusive public space that supports both community wellbeing and environmental sustainability.

This regeneration objective will likely benefit recreational users through a more accessible and attractive public realm, particularly for walkers and cyclists. Primary research for this study highlighted residents' views that canal enhancements alongside accessible open space provision would improve the area of Old Oak and create a more social environment through regeneration.

As a key stakeholder, the Canal and River Trust engaged in consultation for this study in October 2024, sharing knowledge of accessibility requirements and design considerations pertinent to the Canalside. The Canal and River Trust are also a statutory consultee for future planning applications relating to Old Oak, therefore OPDC and the Canal and River Trust have also collaborated to produce a Placemaking Study for the Grand Union Canal to facilitate coordinated vision and strategy to support the creation of an active canal community.

According to the land assembly summary as of June 2025, there is potential for OPDC to acquire a larger extent of the Canal. As a result, OPDC are actively engaging with Canal and River Trust

¹⁰⁸ Public Health England (2020) Improving access to greenspace. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/Improving_access_to_greenspace_2020_review.pdf

¹⁰⁹ Xu, T. (2022) Urban Green Space and Subjective Well-Being of Older People: A Systematic Literature Review. Available at: <https://www.mdpi.com/1660-4601/19/21/14227>

regarding this potential change. At this stage, the extent of this wider regeneration impact is unknown and will be monitored going forward.

Recommendation: It is recommended that OPDC undertake further stakeholder and public consultation to understand the groups potentially affected by this wider regeneration impact and the accessibility needs of these users, such as those living and holidaying on the Canal as well as recreational users and commuters who use the Canalside as part of their onward journey.

Construction related environmental impacts

The construction works associated with the Proposed Regeneration are likely to result in environmental impacts such as noise, vibration and dust from demolition and construction activities.

This will negatively affect most if not all residents in the immediate area. Some residents could be more sensitive to these construction effects than others. For example, those who spend more time at home will be subjected to longer periods of adverse noise impacts including older people, people with disabilities and long-term limiting illnesses and pregnant women/ women on maternity leave or those caring for small children. Some groups with protected characteristics also have differential sensitivity to noise. For example, people with dementia have an increased sensitivity to noise and light.¹¹⁰ Children are also vulnerable to increased noise levels in some instances, particularly those with a cognitive impairment. Autistic children can be particularly sensitive to their environment and, in some cases, can be extremely distressed by loud noise.

There is a tendency for people belonging to protected characteristic groups to experience poorer health. In the case of poor air quality, as a result of construction-related emissions including dust, children, older people, disabled people and pregnant women are more vulnerable to adverse health effects.¹¹¹ Especially in the case of disabled people, those with weak respiratory systems, or suffering from health problems more generally associated with weaker lungs, may be disproportionately impacted by emissions and dust created through construction and maintenance activities. Pregnant women are more vulnerable to the adverse effects of air pollution including an increasing risk of miscarriage as well premature births and low birth weights.

Primary research undertaken to inform this EqIA highlighted the cumulative construction impacts felt by residents as a result of the ongoing HS2 works in Old Oak. When businesses and residents, both directly and indirectly affected by the Proposed Regeneration, were asked to name the disadvantages are about working and living in the area, themes of construction disruption, noise and dust were frequently mentioned.

Residents that remain in the area while regeneration is undertaken are likely to have experienced disproportionate levels of construction impacts over an extended period. Primary research highlighted while residents felt the Proposed Regeneration would be positive in the long-term, in the short-term construction would be disruptive. There is a desire amongst residents for construction to be effectively managed and take place in a short time frame.

Recommendations: Construction and environmental management plans should be implemented throughout the construction phase of the Proposed Regeneration. However, due to the cumulative impact of the numerous construction activities in the area it is recommended that the plans should be particularly thorough and consider the findings of this EqIA to help minimise the impacts on specific vulnerable groups. This includes developing a deeper understanding of the specific issues faced by local residents, active engagement with local residents with health issues and frequent monitoring of issues within the Old Oak area. Appointed contractors should also be required to be members of the Considerate Constructors Scheme.¹¹² The scheme is designed to encourage best practice beyond statutory requirements with contractors required to follow the Scheme's Code of Considerate Practice

¹¹⁰ Social Care Institute for Excellence (2023). Dementia Friendly Environments. Available at: [Dementia - SCIE](#)

¹¹¹ Halonen, J (2015). Road traffic noise is associated with increased cardiovascular morbidity and mortality and all-cause mortality in London. Available at: [Road traffic noise is associated with increased cardiovascular morbidity and mortality and all-cause mortality in London | European Heart Journal | Oxford Academic \(oup.com\)](#); Hjortebjerg, D., Anderson, A.M., Christensen, J.S., Ketzel, M., RaaschouNielsen, O., Sunyer, J., Julvez, J., Foris, J. and Sorensen, M. (2015) 'Exposure to Road Traffic Noise and Behavioral Problems in 7-Year-Old Children: A Cohort Study' Environmental Health Perspectives, 124(2): 228-34; and Leiser, C, Hanson, H, Sawyer, K, Steenblik, J, Al-Dulaimi, R, Madsen, T, Gibbins, K, Hotaling, J, Oluseye Ibrahim, Y, VanDerslice, J & Fuller, M (2019) Acute effects of air pollutants on spontaneous pregnancy loss: a case crossover study, Fertility and Sterility, Volume 111, Issue 2, 2019, Pages 341- 347.

¹¹² Considerate Constructors Scheme (2024). Improving Construction. Available at: [Considerate Constructors Scheme](#)

including the three areas of Respect the Community, Care for the Environment and Value their Workforce.

Safety and security related impacts during construction

The Proposed Regeneration will cover a large area with the construction phase lasting for numerous years. During this time some residents will be living in the area whilst the demolition and construction takes place.

The construction related with the Proposed Regeneration could result in safety and security issues for those who are more vulnerable to safety and security issues including children, women (including pregnant women), older people, people with disabilities, young people, ethnic minority groups and people from the LGBT community. There is a need to balance safety and security with accessibility needs during construction. It is important to ensure that the direct and indirect risks of physical danger associated with construction are minimised.

This may include avoiding the creation of secluded or isolated areas through construction hoardings and footpath diversions that could have an adverse impact on those with mobility issues, in particular older people, disabled people, pregnant women and people with pushchairs.

Further to these safety and security concerns, the primary research carried out indicated that the presence of construction workers has left some residents feeling unsafe or intimidated especially when using public spaces such as local parks. Some protected characteristic groups are more vulnerable to experiencing harassment and discrimination in wider society, and therefore disproportionately impacted by the potential for construction activities to increase this.

By contrast, the long term improvements to the public realm are expected disproportionately to benefit those same vulnerable groups with accessible, well lit, easy to navigate public realms.

Recommendation: A Construction and Environmental Management Plan (CEMP) should outline appropriate management and mitigation of safety and security risks associated with construction alongside a best practice Code of Construction being put in place and followed by an appointed contractor, considering the needs of those with protected characteristics and reflecting any disproportionate impacts.

This may include key walking routes and crossing points in the area being maintained or appropriately diverted where possible and CCTV or manned security provided where natural surveillance has been limited. Awareness and education as to the dangers of playing on construction sites could also be provided in local schools and community centres to discourage children from entering construction areas.

7.6 Transport and connectivity

7.6.1 Wider regeneration impacts

Traffic impacts during construction

During the construction of the Proposed Regeneration, construction related traffic could result in adverse safety impacts for local residents and visitors. Some residents would be more sensitive to the effects of these construction impacts than others, in particular children and young people. Adverse health effects may also be generated through traffic-related noise. In particular, may also increase health risks for older people¹¹³ and lowers health-related quality of life in children.¹¹⁴

Primary research undertaken for this EqlA also highlighted concerns about cumulative traffic impacts of the ongoing HS2 construction works through perceptions of increased congestion, traffic and noise associated with another period of construction. Residents in particular stressed the importance of any future construction road works being organised and well managed in light of the congestion and elongated journeys resulting from HS2 related diversions, road closures and road works. Some

¹¹³ Halonen, J. et al (2015). Road Traffic noise is associated with increased cardiovascular morbidity and mortality in London. *European Heart Journal*. 36(39), 2653-2661. Available at: [Road traffic noise is associated with increased cardiovascular morbidity and mortality and all-cause mortality in London | European Heart Journal | Oxford Academic](#)

¹¹⁴ Hjortebjerg, D. et al (2016). Exposure to road traffic noise and behavioural problems in 7-year-old children: a cohort study. *Environmental health perspectives*, 124(2), 228-234. Available at: [\(PDF\) Exposure to Road Traffic Noise and Behavioral Problems in 7-Year-Old Children: A Cohort Study](#)

residents expressed disproportionate impacts on those with long-term health problems and disabilities being delayed or unable to access health services regularly, as well as delays for young children travelling to school.

Construction activities and associated road works, including road closures and diversions, may also cause disruption to daily journeys made by public transport, in particular buses. Bus routes may be diverted and could require passenger to travel further distances to bus stops and experience longer journey times. Some people with protected characteristics rely more heavily on public transport, such as young people to access education, public services, economic opportunities and social activities and older people to access services such as shops, post offices, healthcare centres and visiting friends and relatives. Any changes in journey routes should be promptly and clearly communicated to passengers to minimise further disruption to their journey and allow time for journey planning to prevent delay.

Recommendation: In order to minimise the potential cumulative traffic impacts associated with construction, OPDC and the appointed contractor should develop a Construction and Environment Management Plan and associated traffic management plans for the Proposed Regeneration which should include a range of measures to mitigate and control environmental and traffic-related issues, such as working hours, communicating road closures/ diversions and working with residents to phase works to minimise construction effects.

Improved public transport and active travel networks

The Spatial Vision for Old Oak includes neighbourhoods within close proximity of new and improved public transport and active travel networks that support sustainable travel and well-being.¹¹⁵ The future Old Oak Common Station will improve connectivity to key destinations across London via the Elizabeth Line and outside London via HS2. Access will also be integrated into the existing transport network including North Acton Underground and Willesden Junction Station.

The Proposed Regeneration is expected to enhance equality of opportunity for the local community, especially those who may be commuting to central London for work or more heavily rely on public transport. In particular, young people are more likely to rely on public transport to access education, public services, economic opportunities and social activities. Older and disabled people may also rely on public transport to access services such as shops, post offices, healthcare centres and visiting friends and relatives.⁴¹

The primary research for this study showed that respondents liked living and working in Old Oak. Due to the close proximity to public transport connections, particularly Underground and Overground services and the associated connectivity to central London and local areas. Public transport connections are heavily relied upon by existing businesses and residents and there is a need for these to be maintained and enhanced.

Further, planned improvements the active travel network could provide a variety of travel choices for people to reach their destination and support physical and mental health benefits for the local community. Well-designed streets can help to promote walking and healthier active transport modes such as wheeling and cycling. Disabled and elderly people are likely to particularly benefit from inclusive access improvements, enabling them to share the physical and mental health benefits of the overall regeneration, as well as underrepresented groups in active travel such as women and ethnic minority groups.¹¹⁶ Many protected characteristic groups are less likely to have access to a car or have the ability to drive and are therefore more dependent on walking and cycling for their journeys. Improvements to transport infrastructure that make walking and cycling journeys easier, safer and more accessible are likely to have benefits for these groups through improved journeys.

OPDC is in the process of drafting a Public Realm and Green Infrastructure (PRGI) SPD¹¹⁷ that would set out the proposed street hierarchy, including walking and cycling routes, alongside the approach to inclusive design and implementing active travel routes. Provided that the proposals are developed in accordance with the principles of this SPD once adopted, this could enable the delivery of a highly

¹¹⁵ OPDC (2024). Old Oak West Supplementary Planning Document. Available at: [Old Oak West SPD Part1 \(14\).pdf](#)

¹¹⁶ Sustrans (2018) Women in UK cities have a positive perception of cycling, yet 73% never ride a bike. Available at: [Women in UK cities have a positive perception of cycling, yet 73% never ride a bike - Sustrans.org.uk](#); Sustrans (2020). New report shows large unmet demand for cycling from ethnic minority and disadvantaged groups. Available at: [New report shows large unmet demand for cycling from ethnic minority and disadvantaged groups - Sustrans.org.uk](#)

¹¹⁷ OPDC (2024). Draft Public Realm and Green Infrastructure SPD. Available at: [Draft Public Realm and Green Infrastructure SPD | OPDC have your say](#)

connected and efficient transport network that enhances local transport accessibility and informs these ambitions in the Proposed Regeneration.

Recommendations: Considerations for the active travel and public transport needs of protected groups such as disabled people should be included within Inclusive Design Principles for the regeneration.

OPDC should also draw on guidance from TfL in the development of regeneration proposals for the transport network.

7.7 Summary of potential equality impacts

Table 7-1 provides a summary of the potential direct impacts of the CPO, indirect impacts of land and property acquisition and the wider regeneration effects. 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.

An update of progress towards the proposed mitigations and further recommendations as of June 2025 has been included.

Table 7-1: Summary of Potential Impacts

Impacts of CPO	Potentially affected protected characteristic groups												Overview of potential effects/ outcomes	Planned mitigation/ Further recommendations	Update (June 2025)
	Age			Sex	Race -ethnic minority groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Socio-economically disadvantaged groups	Other group (homeless, asylum seekers etc)			
	Children	Young People	Older People												
Housing: Direct Impacts															
<div>Loss of homes for owner occupiers</div> <div>(Negative impact)</div>	x		x		x						x		<div>The loss of home could disproportionately impact the one known owner-occupier, who may struggle to find equivalent homes locally. Affected groups may lose important social ties and informal and formal support networks.</div>	<div>Planned mitigation: CPO Compensation Code for eligible owner occupiers acquired pursuant to the CPO.</div> <div>Further recommendations: Resident Relocation Strategy and Independent Residential Advisor.</div>	<div>Planned mitigation: Land Assembly and Relocation Strategy outlining CPO compensation code.</div> <div>Resident Friend providing independent advice to owner occupiers.</div> <div>Further recommendations: Adherence to the CPO compensation code and development of Residential Occupier and Engagement Strategy.</div>
<div>Loss of homes for private renters</div> <div>(Negative impact)</div>	x	x	x				x				x		<div>The loss of approximately 18 privately rented properties may impact upon groups with protected characteristics in particular as they lose vital social and community ties and rely heavily on local services and amenities. Tenants may incur unexpected relocation costs, which could disproportionately impact low-income and disabled individuals.</div>	<div>Planned mitigation: CPO Compensation Code for eligible private renters acquired pursuant to the CPO.</div> <div>Further recommendations: Resident Relocation Strategy and Residential Advisor.</div>	<div>Planned mitigation: Land Assembly and Relocation Strategy outlining CPO compensation code.</div> <div>Resident Friend providing independent advice to private renters.</div> <div>Further recommendations: Adherence to the CPO compensation code and development of Residential Occupier and Engagement Strategy.</div>
<div>Loss of temporary accommodation</div> <div>(Negative impact)</div>	x	x	x		x	x	x				x	x	<div>CPO process could result in potential displacement of 21 temporary housing units provided by LBHF that supports socio-economically disadvantaged individuals and those at risk of homelessness.</div>	<div>Further recommendations: Resident Relocation Strategy and Independent Residential Advisor.</div>	<div>Planned mitigation: OPDC engaging closely with LBHF and provisionally agreed terms to acquire. LBHF have a duty to relocate tenants.</div> <div>Further recommendations: Support LBHF to prevent homelessness and provide clear and accessible communication with occupiers regarding their rights following acquisition.</div>

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Impacts of CPO	Potentially affected protected characteristic groups												Overview of potential effects/ outcomes	Planned mitigation/ Further recommendations	Update (June 2025)	
	Age			Sex	Race -ethnic minority groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Socio-economically disadvantaged groups	Other group (homeless, asylum seekers etc)				
	Children	Young People	Older People													
															Appointment of specialist Resident Friend.	
Loss of homes for Housing Association residents (Negative impact)	x	x	x		x						x	x		CPO may displace two known social housing properties and reduce the availability of homes for social rent, disproportionately affecting low-income tenants, including families, older people, and disabled individuals, who may face challenges in relocating due to limited housing options, support needs, and disruption to local networks and benefits.		Further recommendations: Continue to engage with the Housing Associations and tenants to identify needs and supportive measures for relocation. OPDC must adhere to the CPO compensation code for eligible Housing Association tenants.
Housing: Wider Regeneration Impacts																
Net increase in housing provision in Old Oak (Positive impact)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Unlocking up to 8,000 new homes wider choice of homes catering to the diverse needs of local residents, especially those whose current accommodation may not meet their requirements.	Planned mitigation: Regeneration Strategy. Commitments to wide range of housing types including affordable housing. Safeguarding of Bashley Road Gypsy Traveller site. ¹¹⁸ Further recommendations: Local Lettings Plan and Direct Market Sales.	Planned mitigation: Publication of Regeneration Strategy outlining commitment to deliver a mixture of housing types and tenures.
Potential increase in house prices and rent costs (Negative impact)		x	x				x					x		Property and rental prices may increase as Old Oak is transformed into a new urban district with new homes, commercial spaces and public amenities. Higher rents and living costs across the affected groups could lead to residents being priced out the area.	Planned mitigation: Commitments to affordable housing. ¹¹⁹ Further recommendations: Local Lettings Plan and consideration of priority for local people.	Planned mitigation: Regeneration Strategy highlights commitment to delivering new and affordable homes to rent or buy and maximise affordability within Old Oak.
Changes to the urban landscape (Negative impact)			x				x							Regeneration may cause loss of light and privacy for neighbouring properties due to a change in the urban landscape and increased heights in buildings, disproportionately affecting individuals who spend more time at home e.g. older people.	Planned mitigation: Daylight/Sunlight assessment.	This is a further recommendation for scheme development following the making of the order.

¹¹⁸ OPDC (2022) OPDC Local Plan 2018 to 2038. Available at: [opdc local plan 2022 june 2022 including appendix 0.pdf \(london.gov.uk\)](#)

¹¹⁹ OPDC (2024). Old Oak West Supplementary Planning Document. Available at: [Old Oak West Supplementary Planning Document \(SPD\) | London City Hall](#)

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Impacts of CPO	Potentially affected protected characteristic groups												Overview of potential effects/ outcomes	Planned mitigation/ Further recommendations	Update (June 2025)	
	Age			Sex	Race -ethnic minority groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Socio-economically disadvantaged groups	Other group (homeless, asylum seekers etc)				
	Children	Young People	Older People													
Employment, skills and training: Direct Impacts																
Business closure/ non-viability of business (Negative impact)					x							x		The acquisition and potential CPO of approximately 35 businesses could lead to involuntary business closures or relocations due to relocation costs and losing local customer bases, especially for businesses serving specific ethnic groups and smaller independent businesses.	Planned mitigation: CPO Compensation Code for eligible businesses acquired pursuant to the CPO. Further recommendations: Business Relocation Strategy and Independent Business Advisor. Early release of compensation payments.	Planned mitigation: The Land Assembly and Relocation Strategy outlines adherence to the CPO compensation code and appointment of Business Engagement Officers. Considering the early release of compensation payments where required. Further recommendation: OPDC must adhere to the CPO compensation code and implement the Land Assembly and Relocation Strategy.
Temporary or permanent loss of employment following closure or relocation (Negative impact)		x			x							x		Without appropriate or affordable relocation options, the CPO process could lead to business closures and associated job losses disproportionately affecting employees are from ethnic minority backgrounds and family-run businesses.	Planned mitigation: CPO Compensation Code where applicable. Further recommendations: Business Relocation Strategy and Independent Business Advisor. Skills, Employment and Education Plan.	Planned mitigation: The Land Assembly and Relocation Strategy outlines the aim to prioritise retaining local businesses within its area or wider West London region.
Employment, skills and training: Wider Regeneration Impacts																
New employment and training opportunities during construction (Positive impact)		✓			✓							✓		Construction works are anticipated to provide temporary employment and training opportunities which could particularly benefit the affected groups who face higher unemployment rates.	Planned mitigation: Regeneration Strategy. Further recommendations: Skills, Employment and Education Plan. Responsible Procurement Plan.	Planned mitigation: Regeneration Strategy outlining commitment to driving inclusive economic growth within Old Oak.
New employment and learning opportunities in Old Oak as a result of regeneration (Positive impact)		✓			✓									The Proposed Regeneration will create employment opportunities and places for learning which could especially benefit affected groups who face higher unemployment rates as well as children and young people in education.	Planned mitigation: Regeneration Strategy. Further recommendations: Skills, Employment and Education Plan.	Planned mitigation: Regeneration Strategy outlining commitment to driving inclusive economic growth.

Impacts of CPO	Potentially affected protected characteristic groups												Overview of potential effects/ outcomes	Planned mitigation/ Further recommendations	Update (June 2025)
	Age				Race -ethnic minority groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Socio-economically disadvantaged groups	Other group (homeless, asylum seekers etc)			
	Children	Young People	Older People												
Neighbourhood and Community: Direct Impacts															
Loss of commercial services due to closure of units (Negative impact)					x								The loss of existing businesses at the site is expected to impact local customers and service users, especially those from shared ethnic group or religious background and particular trades that require specialist services.	Planned mitigation: CPO Compensation Code for eligible businesses acquired pursuant to the CPO. New retail and commercial facilities on site as part of Proposed Regeneration. Further recommendations: Continued engagement with local community to identify specific needs.	Planned mitigation: The Land Assembly and Relocation Strategy prioritises retaining businesses and jobs within the local area. Further recommendations: Continued engagement with local community to identify specific needs.
Preservation of existing social space (Positive impact)					✓								OPDC may acquire a business freehold that provides social space to a particular ethnic minority group with the plan to retain this space and support the owner in unlocking positive impacts of the Proposed Regeneration.		Planned mitigation: OPDC have sought to engage with the business owner to agree terms of acquisition. Further recommendations: Continue engagement with the business owner to understand the needs of the social space and allow continued use following regeneration.
Neighbourhood and Community: Indirect Impacts															
Loss of community centre serving the Muslim community (Negative impact)					x	x							The loss of a community centre serving the local Muslim community and providing health, educational, and leisure services could negatively impact on the Muslim Community.	Planned mitigation: CPO Compensation Code if acquired pursuant to the CPO. New community facilities on site as part of Proposed Regeneration. Further recommendations: Continued engagement with Community Centre and Muslim community to identify specific needs.	Planned mitigation: As of June 2025, the community centre has agreed terms of acquisition. Further recommendations: Targeted engagement with community centre users as part of wider engagement to identify how needs can be met in regeneration.
Neighbourhood and Community: Wider Regeneration Impacts															
Community engagement and participation (Positive impact)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	All protected groups can benefit from effective community engagement and consultation. However, some groups are traditionally underrepresented in terms of engagement. This can include children, young people, ethnic minority groups and those from the LGBTQ+ community.	Planned mitigation: Community Engagement Strategy Communications Plan. Further recommendations: Establish a local Community Forum or Working Group for community members	Planned mitigation: OPDC have published an Illustrative Masterplan and are undertaking stakeholder and public consultation in May 2025.

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Impacts of CPO	Potentially affected protected characteristic groups												Overview of potential effects/ outcomes	Planned mitigation/ Further recommendations	Update (June 2025)
	Age			Sex	Race -ethnic minority groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Socio-economically disadvantaged groups	Other group (homeless, asylum seekers etc)			
	Children	Young People	Older People												
														come to feed into the type of commercial services they want on the site.	
Provision of new urban centre with community facilities and services (Positive impact)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Regeneration provides an opportunity for the beneficial operation of businesses and residents alike, with businesses able to modernise their space and new facilities serving the community's needs. For regeneration to be successful, ongoing consultation with affected parties would be beneficial.	Planned mitigation: Regeneration Strategy. Further recommendations: Establish a local Community Forum or Working Group for community members come to feed into the type of commercial services they want on the site. Consider the reprovision of community services lost through the CPO process, including the community centre.	Planned mitigation: Regeneration Strategy outlining the vision for Old Oak.
Health and Wellbeing: Direct Impacts															
Uncertainty and anxiety for existing businesses and residents (Negative impact)	x	x	x		x		x			x	x	x	The CPO process could cause anxiety and stress due to the loss of homes, business or employment. This includes the need to find suitable alternative accommodation and relocation. This could disproportionately impact affected protected characteristics who are vulnerable to health issues or face additional challenges such as language barriers or financial issues.	Planned mitigation: CPO Compensation Code for eligible residents and businesses. Consultation and engagement with local community, including affected residents and businesses. Further recommendations: Business and Resident Relocation Strategies and advisors. It is recommended that OPDC provides assistance in finding affordable alternative business units elsewhere and support with the upfront costs of moving such as moving services and making new units fit for purpose.	Planned mitigation: Land Assembly and Relocation Strategy outline adherence to the CPO compensation code and additional compensation and professional support. Further recommendations: Develop Residential Occupier and Engagement Strategy and actively engage with affected interests both directly and via independent advisors. Provide information in alternative language and formats where required.
Potential loss of visitor's car parking spaces (Negative impact)			x				x			x			To support the Proposed Regeneration, OPDC may compulsorily purchase part of the Shaftesbury Gardens car park comprising visitor spaces. This may disproportionately affect elderly or disabled residents reliant on care visitors, with impacts to be monitored due to limited alternative parking.		Further recommendations: It is advised that OPDC engage with Shaftesbury Gardens residents to assess visitor parking use and explore alternative arrangements for those potentially affected.

Impacts of CPO	Potentially affected protected characteristic groups												Overview of potential effects/ outcomes	Planned mitigation/ Further recommendations	Update (June 2025)
	Age			Sex	Race -ethnic minority groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Socio-economically disadvantaged groups	Other group (homeless, asylum seekers etc)			
	Children	Young People	Older People												
Health and Wellbeing: Wider Regeneration Impacts															
Net increase in accessible open and green space (Positive impact)	✓	✓	✓				✓			✓	✓		The provision of parks and green space and high-quality publicly accessible space may generate equality impacts where users are more sensitive to design and have certain accessibility requirements. Enhancements could improve the physical and mental health of residents and visitors, in particular groups vulnerable to social isolation.	Planned mitigation: Range of open spaces to be created as part of Proposed Regeneration. Further recommendations: Develop inclusive design principles for a consistent approach to accessing public space, informed by the lived experience of affected groups.	This is a further recommendation for scheme development following the making of the order.
Provision of enhanced Canalside (Positive impact)	✓	✓	✓				✓			✓	✓		The enhancement of Canalside to create an accessible and inclusive public space. Enhancements could improve recreational offer at Old Oak, particularly for walkers and cyclists. The extent of this impact is unknown and will be monitored going forward.		Further recommendations: Undertake further stakeholder and public consultation to understand the groups potentially affected by this regeneration objective.
Construction related environmental impacts (Negative impact)	x	x	x	x			x			x			Construction is expected to cause environmental impacts like noise, vibration, and dust disproportionately affecting those spending more time at home and are sensitive to the adverse health effects of poor air quality or noise. These effects are expected to be cumulative in light of ongoing HS2 construction at the site.	Planned mitigation: Construction and Environmental Management Plan (CEMP) Further recommendations: Continuous engagement with residents is crucial to address specific needs. CEMP ‘plus’ to include chapter on specific vulnerable groups with mitigations.	This is a further recommendation for scheme development following the making of the order.
Safety and security concerns during construction (Negative impact)	x	x	x	x	x	x	x	x	x	x			Construction activities may pose safety hazards and security issues for local residents. This may include secluded areas around hoardings, diversions and children playing or travelling near construction sites.	Planned mitigation: The Construction and Environment Management Plan should manage and mitigate safety and security risks and reflect the needs of protected characteristic groups. A best practice Code of Construction should also be implemented. Further recommendations: Inclusive Design Principles Gender Safety Audit	This is a further recommendation for scheme development following the making of the order.

Impacts of CPO	Potentially affected protected characteristic groups												Overview of potential effects/ outcomes	Planned mitigation/ Further recommendations	Update (June 2025)
	Age			Sex	Race -ethnic minority groups	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Socio-economically disadvantaged groups	Other group (homeless, asylum seekers etc)			
	Children	Young People	Older People												
Transport and Connectivity: Wider Regeneration Impacts															
<div>Traffic impacts during construction</div> <div>(Negative impact)</div>	x	x	x				x						Construction traffic can create disruption and increased journey times to local facilities such as employment, healthcare and education. There are also safety risks for vulnerable road users. The ongoing HS2 construction could create cumulative impacts and the need for well-managed future road works to avoid further disruption.	<div>Planned mitigation:</div> Construction and Environment Management Plan. <div>Further recommendations:</div> Continued engagement with local community to identify specific destinations of importance in the area.	This is a further recommendation for scheme development following the making of the order.
<div>Improved public transport and active travel networks</div> <div>(Positive impact)</div>		✓	✓				✓						Improved public transport is anticipated to enhance equality of opportunity for affected groups that heavily rely on public transport and new active travel networks will generate physical and mental health benefits for the local community. Increased active travel infrastructure could also be beneficial for those without access to a car.	<div>Further recommendations:</div> Consider inclusive design principles in new transport infrastructure, which may include integrating principles from the draft PRGI SPD.	This is a further recommendation for scheme development following the making of the order.

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7.8 Regeneration equality outcomes

The evidence gathered for this EqlA and the findings of the assessment have been used to form some initial equality outcomes for the Proposed Regeneration. These equality outcomes align with existing SPD Principles to enhance equality of opportunity for existing and future residents, businesses and visitors as a result of the Proposed Regeneration. **Table 7-2** sets out the proposed equality outcomes alongside initial actions and considerations.

As the Regeneration Strategy is currently being prepared this report allows early consideration of actions to achieve equality outcomes of the Proposed Regeneration. Actions should be monitored and updated frequently.

Table 7-2: Summary of equality outcomes and actions

EqlA theme	Aligned SPD Principles	Equality Outcomes	Actions/Initial considerations
Housing Inclusive and accessible housing for all	HP1 Housing: contribute to the delivery of new homes across Old Oak ranging in tenure, type and size to meet diverse housing needs.	Inclusive and accessible housing for all	Housing mix should be informed by the equality priorities outlined in Table 3-1 , including family-sized homes and affordable housing Housing mix should consider the existing provision of tenures, especially social housing and temporary accommodation Ongoing consultation should be undertaken with housing officers and local residents. Housing should be compliant with local plan and housing standards e.g. lifetime homes
		'Genuinely' affordable housing	Intermediate rent should include a mix of lower rental quartile and London Living rent to help to make it more affordable to local people.
		New homes for local people and those who are disproportionately represented on social housing waiting lists.	Consider market-based scheme for those who have lived in the area for a long time and are at risk of being priced out of the housing market .

EqlA theme	Aligned SPD Principles	Equality Outcomes	Actions/Initial considerations
Employment, jobs and skills Deliver employment and training opportunities for all	EP1 Jobs and local access to training, employment and economic opportunities. SP5 A strong, resilient and diverse economy, which allows existing businesses to thrive and grow and supports the introduction of new businesses to the area: a fair economy across the OPDC area will provide opportunities for locals and Londoners to access a range of employment opportunities across a range of sectors and skill levels.	Creation of jobs for those most at risk of unemployment	Developing and monitoring procurement policies with targets for employment of local people and those from underrepresented groups
		Reducing deprivation through increased opportunities to learn and work	Work with the three host boroughs to ensure skills and employment training and business support is available for local residents.
		Spaces for minority owned businesses and social enterprises to thrive	Work with local partner organisations to understand needs Creation of smaller, affordable commercial units as part of the mix of new commercial units
Neighbourhood and community Placemaking to provide safe, clean and accessible facilities for communities	TCCP1 Town centre uses and areas: deliver wide range of town centre and community uses that meet the needs of local people. TCCP2 Social infrastructure and sports facilities: deliver social infrastructure that is high quality, accessible, inclusive and collocated with publicly accessible open spaces to support social interaction.	A place where people can and want to work, live and socialise. More young people remaining in the area in the long-term.	Engagement with younger people about types of social facilities that are most important Consider social facilities that cater for a wide range of young people.
		An 'age-friendly' community that continues to be home for Old Oak's older long-term residents	Set up community forum for long-term residents to encourage input into regeneration proposals and to support community cohesion.
		Community led social infrastructure	Community engagement and participation to identify priorities for different groups of residents. Market research around needs of emerging / future communities ongoing throughout development period.
Health and wellbeing	GGP1 Good Growth and Social Value: contribute to delivering Social Value by improving health	Reduced health inequalities	Inclusive design framework for open spaces to promote use across all groups and particularly to benefit vulnerable groups.

EqlA theme	Aligned SPD Principles	Equality Outcomes	Actions/Initial considerations
Access to key services and facilities for improved community health and wellbeing	<p>and wellbeing, fairness and day-to-day quality of life.</p> <p>EUP2 Open spaces locations and design: deliver and/or positively contribute towards a well-designed open space network that provides for the needs of people living, working and visiting Old Oak.</p>	All community amenities accessible by walking, cycling and public transport	Planning for more community amenities within walking distance of residents to increase opportunities for walking and cycling and reduce need to travel by private car.
<p>Transport and connectivity</p> <p>Deliver equitable access to transport and enhanced connectivity for the local community</p>	<p>TP1-TP6 Transport: including</p> <ul style="list-style-type: none"> Contribute to safe, inclusive and accessible walking, cycling, bus and street network New and enhanced connections within OPDC development area Promote use of the Grand Union Canal for passengers, leisure and freight transport Deliver Old Oak Common Station as an exceptionally designed 21st century station and transport interchange integrated into the wider movement network <p>Present Willesden Station, North Acton and the potential Old Oak Common Lane Station as improved high-quality stations</p>	Active travel network for all	<p>Using inclusive design principles for active travel network allowing disabled people, and those with trailers and pushchairs to access the travel network</p> <p>Provide and promote schemes for purchasing, hiring, storing and maintaining bicycles.</p> <p>Travel training programme for the area to increase confidence in cycling.</p>
		Safe and secure transport network	Use Gender Safety Assessment ¹²⁰ to design and plan infrastructure including use of day and night design.

¹²⁰ A gender safety audit in this context is an assessment of the transport network that identifies the impact of gender on aspects of safety. For example, feelings of anxiety and uncertainty while using the transport network at night amongst women.

8. EqlA Action Plan

Table 8-1 below sets out the EqlA Action Plan that has been developed in collaboration with OPDC. The Action Plan identifies actions to begin to manage and mitigate the potential negative equality effects and opportunities to enhance positive impacts and equality of opportunity identified through the impact assessment.

The EqlA Action Plan is two-fold; it first sets out a series of actions to be undertaken prior to making the potential CPO that reflect the direct impacts discussed in **Chapter 7** and aim to manage and mitigate any negative equality impacts and opportunities to enhance positive impacts and equality of opportunity for residents and/or businesses who may be directly affected by the CPO (**Action 1 and 2**). Further recommendations for scheme development regarding the potential wider regeneration impacts and regeneration equality outcomes identified in **Chapter 7** are also outlined (**Action 3 to 8**). These are indicative actions that can and should be refined as the regeneration proposals are developed.

This EqlA and EqlA Action Plan should be considered a live document that is updated, refined and monitored at key stages in development of the Proposed Regeneration. In accordance with this, the EqlA Action Plan has been updated to reflect any progress taken towards these actions as of June 2025, primarily focusing on the actions to be undertaken prior to making the potential CPO.

Table 8-1: EqlA Action Plan

Action no.	Actions to be undertaken	Responsible owner	Timescale for Resolution	Update (June 2025)
Direct CPO				
1	Resident Relocation Strategy/ Policies <ol style="list-style-type: none"> Consider and outline appropriate financial support, housing options and non-financial measures being offered/provided to homeowners (occupiers and non-occupiers), private tenants and temporary accommodation tenants. Signpost options for Independent Residential Advisors and mobilise appropriate funding to cover reasonable costs for these services. Undertake regular monitoring and engagement with residents being relocated to measure the level of success of activities in the land assembly and relocation strategy. This should take place during the relocation process and in the long-term following relocation. 	OPDC Development Team	Prior to making CPO	<ul style="list-style-type: none"> OPDC have produced a Land Assembly and Relocation Strategy outlining CPO compensation code for residential interests and a designated OPDC Official to consider further assistance on a case-by-case basis. OPDC encourage eligible residents to seek independent advice and will reimburse reasonable cost for this service. OPDC will signpost options for Independent Residential Advisors where requested. OPDC are in the process of appointing a Resident Friend that will approach eligible residents to offer support as an intermediary independent of OPDC. OPDC have provisionally agreed terms with LBHF to acquire temporary accommodation units and agreed to regular meetings

	<ul style="list-style-type: none"> iv. Provide temporary accommodation tenants with contact details for LBHF and identify them as the Housing Authority responsible for supporting re-housing those in temporary accommodation. v. Consider actions to support LBHF to avoid homelessness, including occupancy until the site is required for regeneration. vi. Consider undertaking benchmarking exercise of London resident relocation policies in practice. 			<p>providing updates on the regeneration programme to provide sufficient notice to vacate tenants from the property and work closely with tenants to minimise disruption.</p> <ul style="list-style-type: none"> • OPDC have plans to contact temporary accommodation tenants directly to provide background on the CPO process and confirm LBHF are the Housing Authority responsible for relocation.
2	<p>Business Relocation Strategy/ Policies</p> <ul style="list-style-type: none"> i. Consider and outline appropriate compensation and support measures being offered/provided to business owners and employees to support successful relocation, such as finding alternative affordable business units, supporting upfront cost of moving and considering the early release of compensation payments. ii. Signpost options for Independent Business Advisors and mobilise appropriate funding to cover reasonable costs for these services. iii. Undertake regular monitoring and engagement with businesses that are being relocated to observe the success of policies in the land assembly and relocation strategy. This should take place during the short term during the relocation process and in the long-term following relocation. iv. Undertake benchmarking exercise of London business relocation policies in practice. 	OPDC Development Team	Prior to making CPO	<ul style="list-style-type: none"> • OPDC have prepared a Land Assembly and Relocation Strategy that outlines policies for occupier engagement for eligible businesses. This includes adhering to the CPO compensation code and appointing a Business Engagement Officer to each business as the principal point of contact in each case and responsible for providing support to the business through acquisition and relocation. • OPDC are exploring the early release of compensation payments where required. • OPDC are assisting with identifying alternative business units that meet the needs of the current business. • OPDC have reviewed other London-based Business Relocation Strategies and will continue to do so throughout the CPO process.
Further recommendations for scheme development				
3	<p>Community Engagement Plan/ Communications Plan</p> <ul style="list-style-type: none"> i. Consider innovative solutions to improve reach to groups which are “traditionally” hard to reach (e.g. online resources to reach young people). ii. Promote diversity monitoring for all engagement activities (i.e. attendance list, % of people from 	OPDC Communications, Engagement and Strategy Team	Ongoing scheme development	Work is ongoing to develop a Community Engagement Plan/ Communications Plan.

	<p>ethnic minority backgrounds, % older people, etc).</p> <p>iii. Consider and accommodate the need for specific language and interpreter needs, specifically for CPO but potentially for wider engagement.</p>			
4	<p>Housing strategies</p> <p>i. Consider the mechanism to proactively encourage and prioritise the needs of local renters and buyers as part of the development of a housing strategy/ policy.</p> <p>ii. Establish a mechanism for collaboration with host Boroughs in determining appropriate social housing nominations.</p>	OPDC Development Team	Ongoing scheme development	The OPDC Housing Strategy Lead has been notified of the actions within the EqIA Action Plan.
5	<p>Inclusive design principles</p> <p>i. Development of inclusive design principles in compliance with the London Plan.</p> <p>ii. Create a specific workstream that will focus on inclusive design, including the consideration of TfL guidance and collaboration with local partners, for example Make Space for Girls.</p> <p>iii. Consider the inclusion of a Gender Safety Assessment</p>	OPDC Design Team	Ongoing scheme development	The OPDC Design Team has been notified of the actions within the EqIA Action Plan.
6	<p>Procurement policies</p> <p>i. Review the EqIA Action Plan before proceeding with procurement, expected to start Summer 2025.</p>	OPDC Development Team	Ongoing scheme development	The OPDC Development Team has been notified of the actions within the EqIA Action Plan.
7	<p>Skills, employment and education related strategies/ policies</p> <p>i. Set up a Working Group comprised of local skills and training providers.</p> <p>ii. Identify local partners to work with in delivering the employment and education opportunities including the Local Boroughs.</p>	OPDC Inclusive Growth Team	<p>Ongoing scheme development</p> <p>Following the appointment of a developer partner Prior to construction</p>	The OPDC Inclusive Growth Team has been notified of the actions within the EqIA Action Plan.

	iii. Assessment of local construction training facilities to determine demand for a standalone Construction Skills Centre in North Acton.			
8	Construction and environmental management <ul style="list-style-type: none"> i. Prepare management plans for construction developed through active engagement with local residents. ii. Consider and review targeted actions for minimising disruptions to specific groups (for example, Bashley Road Traveller Site, older people, disabled people and families with young children) and for specific destinations in the local area such as healthcare and education facilities highlighted in this EqlA. iii. Consider and review of potential cumulative construction impacts from HS2. 	OPDC Development Team and development partner/s	Following the appointment of a developer partner Prior to construction	The OPDC Development Team has been notified of the actions within the EqlA Action Plan.

9. Conclusions and next steps

9.1 Conclusions

The exercise of compulsory purchase powers may be required to enable the full extent of the proposed Old Oak site to be brought under OPDC's control, enabling the Proposed Regeneration to contribute to improvements in the area through a net increase in housing, new employment opportunities associated with the construction and the completed development as well as new leisure, retail and community facilities, commercial units and public open space. The CPO – where required – can help move the proposals forward towards realising the identified positive equality impacts and outcomes arising from the regeneration, including:

- A net increase of approximately 9000 new homes on-site. This includes estimated provisions of 50% affordable housing of which 60% will be social housing. Plans also include family housing, which can be of particular benefit to protected characteristic groups living in the area. However, affordability barriers may make it harder for certain groups, including low-income, ethnic minority households, children living in low-income households and (mainly female-headed) single parent households, from sharing in this benefit. OPDC should aim to ensure that affordability targets of the development are met and that local people are able to benefit from this housing.
- Employment creation in construction related jobs, as well as up to 2.5 million sq ft of new commercial space on the site creating significant further employment opportunities. With appropriate procurement and Skills, Employment and Education Plans in place then this can benefit those who are overrepresented in unemployment figures in the area especially young black people.
- An increase in public open space including improved public realm and increased accessibility and connectivity to public transport and active travel networks. People sharing equality protected characteristics are likely to be able to 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 including a new high street, shops cafes, restaurants, schools and other community amenities such as a new school. Community engagement activities on the Regeneration Strategy are helping to shape proposals.
- Increased health and wellbeing for local people through an increase in open space, enhanced Canalside 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.

However, the assessment shows that there are some direct potential negative impacts associated with the CPO process:

- Loss of homes for a small number of owner-occupiers.
- Loss of private rental accommodation on-site affecting a small number of existing ethnic minority tenants and including those with children. However, the CPO will result in an overall net increase in residential properties which will benefit the wider community including those with protected characteristics.
- Loss of Council run temporary accommodation on-site, resulting in the loss of 21 studio flats.
- Loss of housing association managed homes.
- Loss of a community facility on site providing educational, wellbeing and other services to the local Muslim community.

- A potential loss of businesses claiming to provide a mix of culturally specific services and goods as well as potential loss of cultural and social connections.
- Potential closure of independent businesses including ethnic minority owned businesses. It is considered that the successful relocation of existing businesses will also depend, in part, on the flexibility of individual businesses, some of which are specific in terms of where they consider an appropriate location for their business to operate successfully.
- Temporary or permanent loss of employment following closure or relocation of affected businesses amongst ethnic minority employees.
- There are also some potential negative impacts associated with construction works including noise, air quality, traffic disruption, safety and security issues. These impacts may have a more adverse effect on certain protected characteristic groups.
- The regeneration of the area could also result in increased property prices which in turn may result in higher rents for local residents.

9.2 Next steps

In order to further minimise negative effects and enhance positive effects identified OPDC should consider implementing the actions contained under the EqlA Action Plan outlined in **Table 8.1**.

The EqlA is a predictive assessment and considers the potential effects of the CPO on groups of people rather than on individuals. The recommendations and actions outlined are therefore suggested to minimise effects on recognised groups with protected characteristics living, working and visiting the area at the time of the assessment.

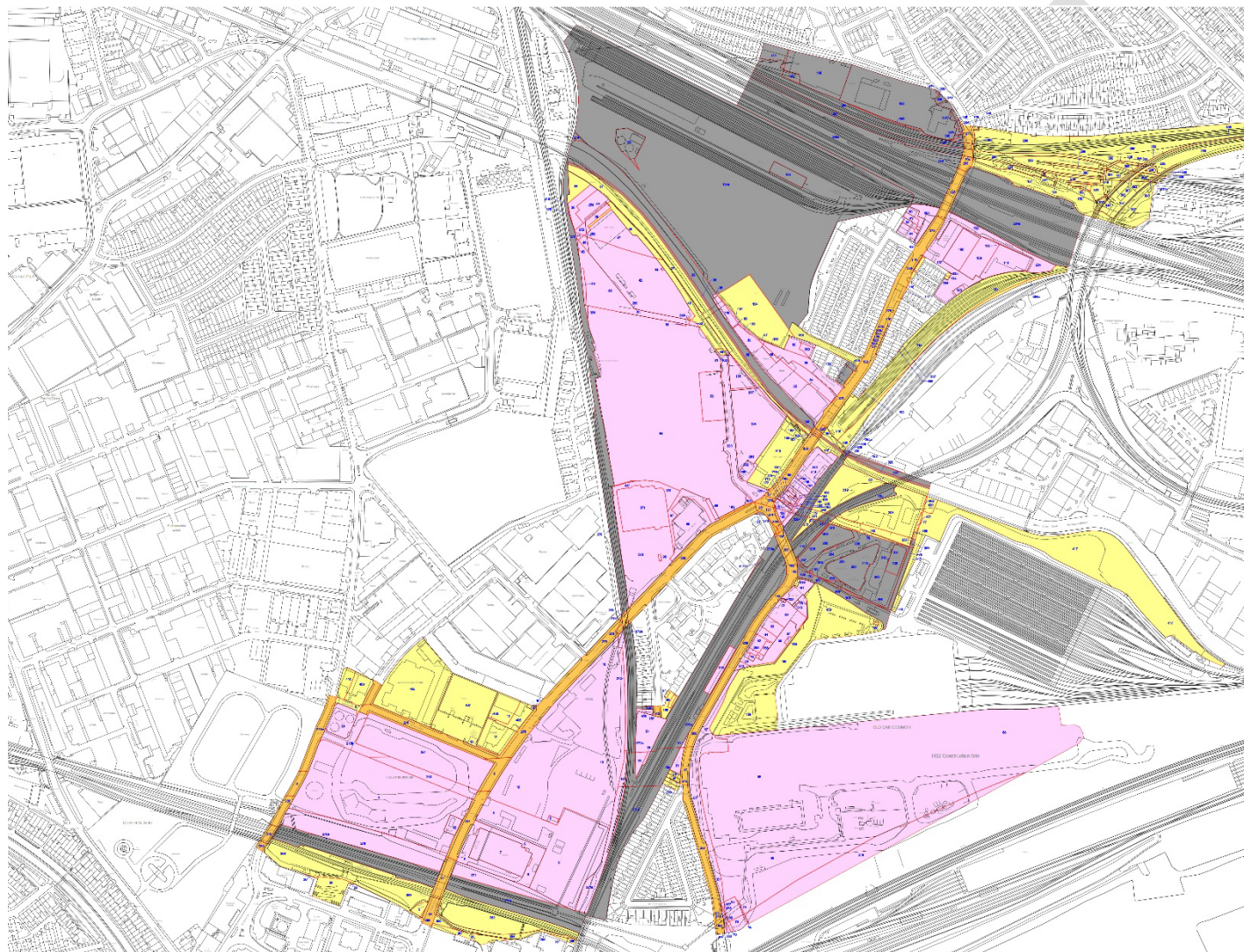
This EqlA should be considered as a live document, and should be updated, refreshed and the actions within it monitored on a regular basis. This should include a monitoring update on the status of identified potential impacts and associated mitigation as undertaken in June 2025. This may result in updates both to assessment of the impacts and to the actions and recommendations relating to the proposed mitigation measures. As a result of OPDC's requirements as a local planning authority, the pace and scope of progress against actions within the EqlA Action Plan may be informed and revised by any new legislation and planning policy.

The ongoing scheme development should reflect the recommendations of this EqlA and it should be shared across relevant stakeholders for review and awareness.

EqlA updates should be undertaken (but not limited to) the following:

- For the purposes of the CPO inquiry (if required);
- When planning application is being prepared (after the regeneration proposals have been confirmed);
- Following the appointment of a developer partner (or partners) - to provide more detail around mitigation measures and assign responsibilities. This is to include mitigation measures to be proposed for inclusion in a Section 106 agreement;
- Prior to construction - to include mitigation for construction impacts following more detailed design and monitoring of impacts of relocation;
- During construction - to respond to newly identified impacts resulting from construction works; and develop a robust meanwhile use strategy to avoid, where possible, long term vacant sites and maximise opportunities for business continuity and temporary housing; and
- After completion of the Proposed Regeneration to monitor long-term impacts.

Appendix A Old Oak Draft Compulsory Purchase Order area (July 2024)¹²¹



Produced by: TerraQuest Solutions Limited Quayside Tower 252-260 Broad Street Birmingham B1 2HF www.terraquest.co.uk 0121 234 1300					
© Crown Copyright and database right 2024. Ordnance Survey 100032216					
Key: <div style="display: flex; align-items: center;"> <div style="width: 15px; height: 15px; border: 1px solid red; margin-right: 5px;"></div> <div>Area to be Referenced</div> </div> <div style="display: flex; align-items: center;"> <div style="width: 15px; height: 15px; background-color: pink; margin-right: 5px;"></div> <div>Land to be acquired</div> </div> <div style="display: flex; align-items: center;"> <div style="width: 15px; height: 15px; background-color: grey; margin-right: 5px;"></div> <div>Land to be excluded</div> </div> <div style="display: flex; align-items: center;"> <div style="width: 15px; height: 15px; background-color: yellow; margin-right: 5px;"></div> <div>Uncertain exclusion or partial exclusion of land</div> </div> <div style="display: flex; align-items: center;"> <div style="width: 15px; height: 15px; border: 2px solid orange; margin-right: 5px;"></div> <div>Public Adopted Highway</div> </div>					
Business Unit: Land Referencing			Status: Final		
Approved By: TPR	Date Approved: 03/09/2024	Checked By: DTA	Date Checked: 03/09/2024	Drawn By: KGA	Date Drawn: 03/09/2024
Title: <div style="text-align: center;"> OLD OAK WORKING DRAFT ORDER MAP FOR DISCUSSION ONLY </div>					
Date of Issue: 03/09/2024		Project Code: 401-0093		Scale: 1:2,000 @A0	
Drawing Reference: 401-0093_000527				Version: 6.0	

¹²¹ Indicative boundary as of July 2024. For the purpose of the surveys, this was the most up to date Order Map available as of 27th August 2024.

Appendix B Equality Survey Notification Letters

B.1 Business notification letter



AECOM Limited

Aldgate Tower
2 Lemn Street
London E1 8FA
United Kingdom
aecom.com

13th August 2024

[address]

Dear Sir/Madam,

Re: Old Oak Regeneration - Equality Impact Assessment Survey

The Old Oak and Park Royal area is being regenerated. OPDC has plans for a canalside district at Old Oak, creating thousands of new and affordable homes, new job opportunities, services, amenities and lots of open green space and public realm. The majority of development will be around the new Old Oak Common station, currently under construction.

The corporation held a programme of engagement and co-design activities to help shape its vision for the area. To further inform the plans as they progress, OPDC has appointed AECOM to prepare an independent Equality Impact Assessment (EqIA). This will identify potential impacts of regeneration. This will help OPDC to understand the potential impacts of regeneration on people with protected characteristics¹²² as defined in the Equality Act 2010.

Part of this work will involve representatives from AECOM conducting interviews with businesses in the area. As such, a member of the team may call at your premises during the survey period 27th August 2024 to 17th September 2024 to request an interview. If there is nobody available when they call, they may seek to arrange an appointment at a more suitable time. The interview should take no longer than fifteen minutes and will seek to gather information on the following:

- Business type/length of time at current premises/lease type
- Number of employees
- Customer base
- Your views on regeneration
- How regeneration could support your business needs and customer base

All AECOM representatives will present formal identification before interviews commence.

Feedback received from the EqIA will be used to help inform the plans as they develop. You are under no obligation to take part in this survey, although we would welcome your participation as the information you provide will help to ensure that regeneration benefits both

¹²² The Equality Act 2010 introduced the term "protected characteristics" to refer to groups that are protected under the Act. More information can be found at: <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>

existing businesses and particularly those with protected characteristic. It will also help to support the development of proposals and activities to maximise positive social outcomes of local communities.

AECOM is a Market Research Society Company Partner and all information provided will remain confidential and only be used for the purposes of the Equality Impact Assessment in line with the Market Research Society Code of Conduct and General Data Protection Regulation. This survey is part of the standard process ahead of more detailed community consultation to ensure that large development proposals are shaped and influenced by residents and businesses.

If you have any questions about the Equality Impact Assessment then please contact AECOM on the contact details below.

Yours faithfully,
Lucy Jones
Social Impact Consultant
AECOM Limited
E: lucy.jones@aecom.com
M: 07341169792

B.2 Residential notification letter



AECOM Limited
Aldgate Tower
2 Leman Street
London E1 8FA
United Kingdom
aecom.com

13th August 2024

[address]

Dear Resident,

Re: Old Oak Regeneration - Equality Impact Assessment Survey

The Mayor of London's development corporation for Old Oak and Park Royal, OPDC is responsible for regenerating the Old Oak and Park Royal area. OPDC has plans for a canalside district at Old Oak, creating thousands of new and affordable homes, new job opportunities, services, amenities and lots of open green space and public realm. The majority of development will be around the new Old Oak Common station, currently under construction.

You may have been involved in the early stages of shaping OPDC's plans for Old Oak last year, when the corporation held a programme of engagement and co-design activities to help shape its vision for the area. To further inform the plans as they progress, OPDC has appointed AECOM to prepare an independent Equality Impact Assessment (EqIA). This will identify potential impacts of regeneration at Old Oak on the existing community, to ensure that OPDC's plans best meet the needs of local people, in particular those with 'protected characteristics'¹²³ as defined in the Equality Act 2010.

Part of this work will involve representatives from AECOM conducting interviews with residents in the area. As such, a member of the team may call at your premises during the survey period 27th August 2024 to 24th September 2024 to request an interview. If there is nobody available when they call, they may seek to arrange an appointment at a more suitable time. The interview should take no longer than fifteen minutes and will seek to gather information about this household, views on regeneration and how regeneration may help to meet resident needs and support quality of life. All representatives will present formal identification before interviews commence.

It is important to note that OPDC's proposals have not yet been fixed or finalised, and that the feedback received from the EqIA interviews will be used to help inform plans as they develop.

You are under no obligation to take part in this survey, although we would welcome your participation as the information you provide will help to ensure that regeneration benefits both existing residents and newcomers, meets local people's needs and seeks to enhance, rather than impact, communities – particularly those with protected characteristic. It will also help to support the development of proposals and activities to maximise positive social outcomes of local communities.

AECOM is a Market Research Society Company Partner and all information provided will remain confidential and only be used for the purposes of the Equality Impact Assessment in line with the Market Research Society Code of Conduct and General Data Protection Regulation. This survey is part of the standard process ahead of more detailed community consultation to ensure that large development proposals are shaped and influenced by residents and businesses.

¹²³ The Equality Act 2010 introduced the term "protected characteristics" to refer to groups that are protected under the Act. More information can be found at: <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>

If you have any questions about the Equality Impact Assessment then please contact AECOM on the contact details below.

Yours faithfully,
Lucy Jones
Social Impact Consultant
AECOM Limited
E: lucy.jones@aecom.com
M: 07341169792

DRAFT

Appendix C Old Oak West: Equalities Impact Assessment Baseline Report (Arup) [double-click to open]

ARUP

Old Oak West: Equalities Impact Assessment Baseline

Equalities Impact Assessment Baseline Report

| 16th February 2023



This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Ove Arup & Partners Limited
8 Fitzroy Street
London
W1T 4BJ
United Kingdom
arup.com

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**OLD OAK AND PARK ROYAL DEVELOPMENT
CORPORATION - LAND ASSEMBLY AND
RELOCATION STRATEGY**

JANUARY 2025

This document sets out the principles that OPDC will apply in engaging with existing owners and occupiers of land and property within the boundary of the proposed Old Oak regeneration area.

1. Introduction

- 1.1. This Land Assembly and Relocation Strategy ("LARS") sets out the principles that Old Oak and Park Royal Development Corporation ("OPDC") will apply in engaging with existing owners, occupiers, and those with other interests in land and property within the boundary of the proposed Old Oak regeneration area ("Old Oak"), and how these interests will be brought together under single ownership.
- 1.2. Old Oak comprises approximately [28] hectares of land, from Willesden Junction station in the north, to North Acton in the south and to the east includes the new Old Oak Common HS2/Elizabeth Line and national rail station. The Old Oak area provides the opportunity for a nationally significant high density mixed-use development comprising around 9,000 new homes, three million square feet of commercial and work-space, new community and public facilities, new parks and open space ("the Scheme").
- 1.3. Much of the land within the boundary of Old Oak is in the public ownership of the Department of Transport (and currently used as worksites in connection with HS2), Network Rail and TfL.
- 1.4. The remainder of the Old Oak land is in private ownership. Since mid-2023 OPDC has been seeking to actively acquire this land (with considerable success) and otherwise engaging with landowners and occupiers. The LARS applies to the outstanding property interests that are not in public ownership, and seeks to document in overarching terms, the approach to landowner engagement that has been ongoing since mid-2023, and which will be pursued going forward.
- 1.5. All reasonable attempts will be made to engage with the remaining owners and occupiers and, where appropriate, efforts will be made to acquire these by agreement. However, given the outstanding number of interests to be acquired, and the complexity of land ownership, it is likely that OPDC will need to promote a Compulsory Purchase Order ("CPO") to provide certainty that all land and property interests can be acquired, for a reasonable price and in a timely manner.
- 1.6. The purpose of this LARS is to provide an explanation as to the basis on which the remaining privately owned land interests will be acquired and the support that will be afforded to affected parties, in parallel with the CPO process. It demonstrates how OPDC will act in accordance with the requirements of the relevant Government Guidance, whilst also recognising that interference with property rights can be unsettling and disruptive. OPDC will be transparent and deal with all affected parties fairly and reasonably.
- 1.7. OPDC is a Mayoral Development Corporation ("MDC") set up under Part 8, Chapter 2 of the Localism Act 2011 ('the Act') with the objective, as set out in section 201(1) of the Act, of securing the regeneration of the area for which

the MDC has been established.

- 1.8. Section 207(2) of the Localism Act 2011 provides OPDC with the ability to promote a CPO to compulsorily acquire the land and property interests necessary for the purpose of securing the regeneration of its area.
- 1.9. Before exercising its compulsory purchase powers, and throughout the preparatory and procedural stages of promoting any CPO, OPDC will have regard to the "*Guidance on the Compulsory Purchase Process*" ("the Guidance"), published by the Ministry of Housing, Communities & Local Government in October 2024. The Guidance is available at:

[Guidance on the compulsory purchase process](#)

- 1.10. Paragraph 2.1 of the Guidance states that:

"Acquiring authorities should use compulsory purchase powers where it is expedient to do so and where there is a compelling case in the public interest to make a compulsory purchase order."

- 1.11. Paragraph 2.2 of the Guidance states that:

"The confirming authority will expect the acquiring authority to demonstrate that they have taken reasonable steps to:

- *understand the impact of the exercise of the compulsory purchase powers included in the compulsory purchase order on those with an interest in the land, for example affected owners and occupiers, through direct engagement with those parties*
- *attempt the acquisition of all the land and rights include in the compulsory purchase order by agreement and acquire all of the land and rights included in the Order by agreement."*

- 1.12. Section 6 in Tier 2 of the Guidance provides specific guidance to MDCs promoting CPOs under Section 207 of the Localism Act 2011.

2. Communication and Engagement

- 2.1. Paragraph 17.1 of the Guidance states that:

"Undertaking negotiations and engagement prior to, and in parallel with, preparing and making a compulsory purchase order can help to build good working relationships with those whose interests are affected. Acquiring authorities should be open and honest with those whose interests are affected and treat their concerns with respect."

- 2.2. Paragraph 19.1 of the Guidance sets out other steps that should be considered with a view to helping those affected by a compulsory purchase proposal.

- 2.3. OPDC will:

- Make reasonable efforts to contact each property owner and occupier and provide details about its intention to promote a CPO and the indicative timetable for this. Regular contact will be maintained and updates to owners and occupiers provided to ensure awareness of key dates and any timetable changes. OPDC will seek to keep any delays to a minimum by completing the statutory process as quickly as possible and taking every care to ensure that any CPO is made correctly, appropriately and justifiably.

- Provide plain English guidance that is publicly available. Currently, there are three relevant procedural notes published by the Government, which provide: A procedural overview (Guide 1); A compensation guide to business owners and occupiers (Guide 2); and, A compensation guide to residential owners and occupiers (Guide 4). Links to each of these are set out below:

[Compulsory purchase and compensation: guide 1 - procedure - GOV.UK](#)

[Compulsory purchase and compensation: guide 2 - compensation to business owners and occupiers - GOV.UK](#)

[Compulsory purchase and compensation: guide 4 - compensation to residential owners and occupiers - GOV.UK](#)

- Provide full details for a named person at OPDC (or its agent) to be the first point of contact for all issues relating to the proposed acquisition and CPO.
- Make owners and occupiers aware of the professional advice available (for example provide details of the CPO “helpline” operated by Royal Institution of Chartered Surveyors) and (where appropriate) the basis on which any early fees incurred may be reimbursed by OPDC.
- Offer additional practical support to business and residential occupiers (see “Occupier Engagement”, below).

2.4. OPDC will also:

- Wherever possible, provide a “not earlier date” of when possession of land and property is required, and offer flexibility on occupational arrangements up to that date.
- Appoint a dedicated Business Engagement Officer, to offer to work with affected businesses to understand the impact of the proposed acquisition and provide support for relocation (see “Occupier Engagement”, below).
- Where compulsory purchase is likely to be required in the absence of agreement (see “Basis of Acquisition”, below), offer compensation consistent with the amount that would be payable if a CPO were confirmed and implemented (in line with the “compensation code”).
- Where appropriate, provide early undertakings regarding the reimbursement for reasonable professional fees incurred before the implementation of a CPO.

2.5. OPDC will maintain a continuing dialogue, where practicable, with all parties holding an interest in properties within the land required to deliver the Scheme or those from whom rights need to be acquired and those who have existing rights which may be affected by the Scheme.

2.6. OPDC and its advisers will seek to respond promptly to all enquiries received from affected parties.

3. Basis of Acquisition

3.1. In accordance with the Guidance, where compulsory purchase would

otherwise be required, OPDC will use reasonable efforts to acquire all interests by agreement or reach an agreement that establishes the basis on which a future transaction will be undertaken. Where the offer for early negotiation is accepted, OPDC will progress negotiations diligently and in all circumstances will maintain comprehensive written records to evidence the position with each party.

- 3.2. OPDC will have flexibility with regards to the structure of such agreements. It is intended that a range of contractual mechanisms will be used, to reach agreement on land interests needed to deliver the Scheme as far as reasonably practicable. This may include options, conditional contracts, or acquisitions of bodies corporate.
- 3.3. Paragraph 2.7 of the Guidance states that:

“Where acquiring authorities secure the acquisition of land by agreement, they may pay compensation as if it had been compulsorily purchased unless the land was already on offer on the open market.”

Paragraph 3.1 goes on to state:

“When offering financial compensation for land in advance of the making of a compulsory purchase order.... public sector organisations should consider value for money as a whole in order to avoid any repercussive cost impacts...”

And paragraph 3.2 states:

“Acquiring authorities can consider all of the costs involved in the compulsory purchase process when assessing the appropriate payments for purchase of land in advance of compulsory purchase.”

- 3.4. If an interest is compulsorily acquired, the holder of that interest is entitled to be compensated in accordance with what is commonly referred to as the “compensation code”. This is the name given to the collection of statutes, case law and established principles used in determining compensation claims and OPDC will engage with property owners accordingly, and in line with these paragraphs from the Guidance.
- 3.5. The compulsory purchase of a leasehold property interest would **not** be required if OPDC secures the superior (freehold) interest and is able to terminate the lease, either due to expiry or from the exercise of a landlord’s break notice, prior to the date on which possession is required as landlord. In such cases, OPDC will use its position as landlord to obtain possession, paying compensation if appropriate under s37 of the Landlord and Tenant Act 1954.
- 3.6. Certain property owners (essentially residential owner-occupiers and commercial owner-occupiers with a Rateable Value less than RV£44,200) are entitled to serve blight notices which, if accepted, would require OPDC to effect the early acquisition of property. Any blight notices issued will be considered on a case-by case basis, but assuming any such notice relates to property located within the Old Oak area, the general presumption is that such notices will be accepted, in accordance with OPDC’s general land acquisition strategy.

4. Occupier Engagement

Commercial Property

- 4.1. Notwithstanding the proposed basis of acquisition, OPDC will seek to engage with **all** commercial occupiers within the Old Oak area in accordance with

paragraphs 2.3 and 2.4 above.

- 4.2. OPDC will assign a Business Engagement Officer (“BEO”) to each occupier, who will usually be the principal point of contact in each case, in relation to supporting the business through change and relocation. Their role could include, inter alia: understanding the nature of the business and supporting the business to assess its future space and geographical requirements; coordinating a site search and connecting the business owner to local workspace providers and agents; utilising public-sector contacts to identify local properties, liaising with OPDC’s Delivery team regarding timetable and other practical arrangements; providing contacts for specialist business advice; and supporting applications for grant funding, business loan and growth support that might be available.
- 4.3. OPDC will aim to retain local businesses and employment within the OPDC or wider West London area but will work with businesses to support relocation elsewhere in London or beyond if that provides a better solution to meet business needs.
- 4.4. OPDC recognises the importance for existing businesses of being able to plan their relocations with as much advance information as is reasonably practicable, to assist in a smooth transition of their operations from one location to another and therefore where possible will provide a not-before date of the requirement for vacant possession of the site to allow the Business sufficient time to plan and organise relocation.
- 4.5. All engagement with commercial property occupiers will be aligned with the recommendations set out in the Equality Impact Assessment Action Plan prepared by AECOM for OPDC.
- 4.6. OPDC will also engage with qualifying businesses occupiers regarding compensation in accordance with Section 3 above.

Residential Property

- 4.7. OPDC recognises the importance of residential property owners and occupiers being able to plan their relocations with as much advance information as is reasonably practicable, to ensure a smooth transition from their existing home into another. OPDC will seek to engage with all residential occupiers within the Old Oak area in accordance with paragraphs 2.3 and 2.4 above.
- 4.8. A dedicated officer from the OPDC Delivery Team will be allocated to engage with each residential owner, with a view to working collaboratively to achieve a mutually agreeable acquisition and/ or relocation solution.
- 4.9. OPDC will also engage with qualifying residential occupiers regarding compensation in accordance with Section 3 above. Assistance that may be available and considered on a case-by-case basis, could include providing flexibility on the timing of acquisition, the forward funding of costs and providing a short term “lease back” of property acquired. OPDC’s overall aim is to minimise disruption associated with the acquisition of property.
- 4.10. All engagement with residential property occupiers will be aligned with the recommendations set out in the Equality Impact Assessment Action Plan prepared by AECOM for OPDC.

5. Contact Information

- 5.1. All general queries relating to this Land Assembly and Relocation Strategy, and for owners/ occupiers seeking to engage with OPDC, should be made in the first instance to:

Aidan Fletcher Watts

Email: opdc_lat@london.gov.uk

Phone number: +44 7761 346014

Title of report: Old Oak Illustrative Masterplan
Meeting date: 10 July 2025
Report to: Board
Report of: Gareth Blacker, Executive Director of Delivery

For Decision

This report will be considered in public

1. Summary

- 1.1 This paper outlines the draft Old Oak Illustrative Masterplan and sets out the next steps for preparing a Masterplan Framework. The Masterplan Framework will include development principles and guidance to inform future development proposals at Old Oak based on the Illustrative Masterplan.
- 1.2 The paper seeks the Board's endorsement of the Illustrative Masterplan as the basis for informing the preparation of a Masterplan Framework and in support of the proposed compulsory purchase of land at Old Oak which is considered under a separate report to the Board at agenda item 13.

2. Recommendations

The Board is invited to:

- 2.1 **Note the purpose and scope of the Old Oak Illustrative Masterplan;**
- 2.2 **Note the pre-application engagement with the Local Planning Authority, stakeholders and local community in developing the Old Oak Illustrative Masterplan;**
- 2.3 **Endorse the Old Oak Illustrative Masterplan (Appendix 1) as the basis for informing the preparation of a Masterplan Framework;**
- 2.4 **Endorse the Old Oak Illustrative Masterplan as the basis for demonstrating the type of scheme for the comprehensive regeneration of land at Old Oak; and**
- 2.5 **Note the next steps in preparing the Old Oak Masterplan Framework.**

3. Background

- 3.1 The Illustrative Masterplan (Figure 1) includes areas of land in the London Borough of Ealing, the London Borough of Hammersmith and Fulham and the London Borough of Brent. The site comprises approximately 31 hectares of brownfield land spanning between North Acton in the south and Willesden Junction Station in the North and is bounded by the Old Oak Common Rail Depot, North Pole Rail Depot, Willesden Junction Station and North Acton Station with Victoria Road (A4000) running north to south. The site currently comprises a mix of industrial and commercial units, residential properties, HS2 construction sites, public adopted highways, railway land and sidings.



Figure 1 Old Oak Illustrative Masterplan

- 3.2 The arrival of HS2 and the Elizabeth Line into Old Oak Common Station will significantly improve public transport access to the area, providing rapid train links (via HS2, the Elizabeth Line and the Great Western Railway) to established innovation zones including Euston, Barts Life Sciences, Birmingham Innovation Quarter and Oxford. Although the timing for delivery has been delayed, Old Oak Common Station is set to become the second largest rail station in London and the largest sub-surface station to have been built in the UK. The station will support the wider Old Oak area in becoming a new strategic destination, 10 minutes from Heathrow and central London. This provides the opportunity for Old Oak to become a new high density urban district that makes a significant contribution to housing delivery and economic growth in the capital.
- 3.3 In early 2024, the OPDC Board, Ministry for Homes Communities and Local Government (MHCLG) and Department for Transport (DfT) approved the Old Oak Outline Business Case (OBC), agreeing the need for comprehensive development to achieve the public benefit and outcomes set by the Old Oak Strategic

Objectives. We are therefore progressing a number of workstreams related to the comprehensive regeneration of Old Oak, including the preparation of an Illustrative Masterplan for the site.

- 3.4 Securing the regeneration of Old Oak is supported in national and local planning policy. The National Planning Policy Framework (NPPF) (2024) focusses on the significance of boosting the supply to meet an area's identified housing need and places substantial weight given to development of brownfield land. The London Plan (2021) identifies that the OPDC Area can deliver a minimum of 25,000 homes and 65,000 jobs, making it one of London's and the UK's largest regeneration areas. The development of Old Oak is expected to significantly contribute towards meeting this target and represents a major opportunity to ensure that these new homes and jobs are located sustainably, close to a major new transport hub on predominantly brownfield land, most of which is already owned by the public sector.
- 3.5 The OPDC Local Plan (2022) supports the comprehensive regeneration of Old Oak West and sets out OPDC's spatial vision and a series of policies to shape the regeneration of the Old Oak and Park Royal with the overall ambition of creating a new part of London that acts as a catalyst for growth at national, regional and local levels. The Old Oak West Supplementary Planning Document (SPD) (2024) covers substantially the same area of the Old Oak site. It provides spatial planning guidance for Old Oak West (now referred to as "Old Oak") and encourages a comprehensive and coordinated approach to development.
- 3.6 The Old Oak Regeneration Strategy (2025) reinforces the Strategic Objectives from the OBC in delivering the comprehensive regeneration of the area and sets out a vision that requires a comprehensive, planned approach to redevelopment at a strategic level.
- 3.7 It is within this context that we have developed and prepared the Old Oak Illustrative Masterplan.

4. Purpose of the Illustrative Masterplan

- 4.1 The adopted Local Plan and Old Oak West SPD form the planning policy framework for Old Oak, however, these represent planning policies rather than a scheme that might be delivered. Therefore, since the adoption of these policy documents, we have progressed site-wide design development of an Illustrative Masterplan which has provided the basis for pre-application engagement with the Local Planning Authority (LPA), stakeholders and the local community. This early pre-application engagement is important to demonstrate general accordance with the planning policy framework but also to provide the basis for supporting any policy deviations.
- 4.2 The Illustrative Masterplan provides a clear indication of how the regeneration of Old Oak could be delivered. It tests how the different requirements for the sites can be accommodated by showing how the comprehensive development proposals for Old Oak could be delivered and will help identify development principles and guidance as well as site-wide delivery strategies to inform any future planning application.

- 4.3 The timing of the Board's endorsement of the Illustrative Masterplan, and the preparation of the Masterplan Framework that follows, is an important milestone as this will support the development partner procurement which is expected to be launched in the autumn. Formal pre-application advice and feedback from the LPA will provide prospective development partners with a clear sense of the direction of travel and provide a degree of certainty on the development principles and guidance that have been discussed and agreed with the LPA.
- 4.4 Early pre-application engagement on the Illustrative Masterplan ahead of development partner procurement should enable OPDC and its developer partner(s) to progress to application stage at a greater pace having already engaged with the LPA and other stakeholders. This supports 'Delivery at Pace' which is one of the Strategic Objectives set out in the OBC and OPDC's Regeneration Strategy.
- 4.5 The Illustrative Masterplan will also provide a basis for informing future policy reviews, providing the evidence base for making representations to the future Local Plan Review.
- 4.6 Finally, OPDC is progressing land assembly of the site through acquisitions by agreement but is also preparing a case for a Compulsory Purchase Order (CPO) which is reported under agenda item 13. An illustrative Masterplan, endorsed by OPDC's Board in its capacity as acquiring authority will help to demonstrate that the comprehensive redevelopment of the land at Old Oak is capable of being in accordance with the Local Plan when development proposals are considered in the context of any future planning application.

5. Old Oak Illustrative Masterplan

- 5.1 In 2022, we appointed a design team to develop an illustrative masterplan, comprising Gort Scott, Allies and Morrison and Periscope and supported by Expedition and Mott MacDonald.
- 5.2 Following community and stakeholder engagement in 2023, we developed a set of 'Spatial Principles', or overarching spatial masterplanning principles, to underpin future proposals for Old Oak, including the Illustrative Masterplan. How routes, green spaces and neighbourhoods look beyond the threshold of the masterplan area and stitch into and complement the existing neighbourhoods of Harlesden, Park Royal and North Acton will be an important consideration for future development proposals. These are intended to create a strong framework which is specific to the places and opportunities at Old Oak and enable the more detailed scheme to evolve and be refined whilst ensuring the core ambitions for character, quality and placemaking are delivered. The Spatial Principles are illustrated in Figure 2.



Figure 2: Spatial Principles

- 5.3 Building on these Spatial Principles, we have developed a site-wide Illustrative Masterplan, which is a spatial representation of how the site could be delivered. The proposal includes the creation of two new neighbourhoods, Channel Gate Canalside Neighbourhood and Old Oak Town Centre, which will provide approximately 8,000 homes (including affordable), 150,000-200,000 sqm employment and community floorspace including a three-form entry primary school, a leisure centre, health and community facilities. The Illustrative Masterplan also proposes the creation of 2.4 hectares of open space, green corridors and canal enhancements as well as improved pedestrian and cycle connectivity.
- 5.4 The following paragraphs outline the proposals represented in the Illustrative Masterplan and Appendix 1 includes the Illustrative Masterplan together with indicative images of the proposals.

Canalside Neighbourhood

- 5.5 The Canalside neighbourhood will be an active mixed-use new district with approximately 5,000 new homes as well as a new neighbourhood centre which will include retail and community spaces as well as a new 3 form entry primary school. The proposal also includes a new canal-side park - Channel Gate Park - which will open onto the Grand Union Canal, supporting biodiversity, managing flood resilience and offering spaces for play, relaxation and gathering.

Old Oak Town Centre

- 5.6 Old Oak Town Centre will be a new mixed-use district that will provide a new commercial spine extending from the new Old Oak Common Station to neighbouring areas of North Acton and Park Royal, connected by a new East-West Bridge as well as new pedestrian and cycle routes. A new park is also proposed - Acton Wells Park – which will link with the wider green network. The town centre includes 120,000-185,000 sqm of employment and community floorspace including a leisure centre, health facility and retail as well as approximately 2,700-3,000 new homes.

Connecting Parks and Landscape

- 5.7 The Illustrative Masterplan proposes a network of new parks and green spaces that are open, accessible and improved for both people and nature. These spaces will support play, biodiversity and climate resilience, helping to create a healthier, more connected place for both new and existing communities.

Connectivity and movement

- 5.8 The Illustrative Masterplan proposes improved pedestrian and cycle routes, creating healthier and more connected streets. These improvements will establish safe, accessible pathways linking key destinations such as Harlesden, Park Royal, North Acton, and White City. The network will feature segregated cycle lanes, widened footpaths, and improved lighting, ensuring comfort and safety for all users. By integrating with existing green spaces and public transport hubs, these routes will promote active travel and reduce reliance on cars, contributing to a more sustainable urban environment.

The Old Oak Mile

- 5.9 The Illustrative Masterplan proposes a new high street along the existing Old Oak Lane and Victoria Road, running from Harlesden to North Acton and connecting key public transport networks, existing neighbourhoods and communities. The Old Oak Mile will consist of different character areas, providing different uses and experiences and be an opportunity for more active frontages and will prioritise pedestrians and cyclists by including new cycle lanes, accessible footpaths, landscaping and seating.

The Common Cut

- 5.10 The Common Cut will form part of a wider network of pedestrian and cycle friendly streets across the area. Along with the Old Oak Mile, it will act as one of Old Oak's main north-south corridors linking Old Oak Common Lane North and improving connections to and from Harlesden, the new East-West Bridge and Wormwood Scrubs. The Common Cut will be a key walking and cycling route and form part of a wider network of safe, accessible streets across Old Oak.

The Old Oak Line

- 5.11 The Illustrative Masterplan includes a new east-west route connecting Old Oak Common Station to North Acton and Park Royal which will improve access across the area and significantly shorten walking times between key destinations. The route is planned as an active travel route and will provide a continuous landscaped

route, including a new East-West Bridge from Old Oak Common station and over the railway connecting into the heart of the new town centre.

Planning Policy Deviations

- 5.12 The Illustrative Masterplan contains a small number of policy deviations from the Local Plan and deviations from the Old Oak West SPD (which is not part of the development plan but is a material consideration) which have been discussed as part of the pre-application engagement with the LPA and stakeholders. These are outlined in the following paragraphs:

The approach to delivering Old Oak Town Centre and the reduction in employment floorspace

- 5.13 The Illustrative Masterplan proposes three commercial clusters proposed in the Old Oak Town Centre, compared to a single employment hub centred around the Old Oak Common station identified in the Local Plan. The Local Plan also identifies a target of 268,540 sqm of employment floorspace, compared to the 120,000-185,000 sqm proposed by the Illustrative Masterplan. The approach to delivering Old Oak Town Centre and the employment floorspace reflects an evolved position since the Local Plan was adopted and is a response to new site constraints, including safeguarding for HS2 infrastructure and the proposed West London Orbital. We have also responded to commercial advice and early market engagement which supports the need for lower commercial guiding heights and floorplates with greater diversity and flexibility of workspace to attract a range of potential sectors and occupiers.

The relocation of the proposed leisure centre to the Old Oak Town Centre from the Canalside neighbourhood (Channel Gate) where it is illustratively identified in the Old Oak West SPD

- 5.14 The relocation of the proposed leisure centre follows feedback from service providers as well as commercial advice in improving the attractiveness of the Old Oak Town Centre for potential occupiers of the proposed commercial space. This will also support the viability of the leisure centre given the opportunities of the increased catchment and patronage.

Tall buildings which exceed the range of building heights set out in the Local Plan

- 5.15 The Illustrative Masterplan proposes a number of tall buildings that exceed the current policy. The approach to the location and distribution of building heights, including tall buildings is supported by a site-wide strategy and has sought to manage the total number of tall buildings across the masterplan area.

In general, the strategy has sought to locate tall buildings in the Old Oak Town Centre and close to public transport, with lower-rise buildings at the Canalside Neighbourhood and using tall buildings to mark arrival points and long-distance views, including the Old Oak Common Station, North Acton and Harlesden and the proposed parks. Tall buildings are also used to connect the two new neighbourhoods. This approach has enabled lower heights and reduced massing elsewhere in response to local context and to limit overshadowing of the new parks and open spaces.

The inclusion of non-designated heritage assets at Victoria Terrace within the Illustrative Masterplan

- 5.16 The Illustrative Masterplan proposes the demolition of 8-12 Victoria Terrace, which are Locally Listed Buildings (non-designated heritage assets). This demolition is not included in the Old Oak West SPD. The redevelopment of Victoria Terrace will enable significant benefits in terms of place-making, public realm and connectivity as well as increase the number of new homes. In particular, the redevelopment of Victoria Terrace would support the delivery of Old Oak Mile by enabling a high-quality public realm and critical mass of ground floor uses at this prominent location. Any future planning application will need to make the case for the loss of these locally listed buildings. We are confident that the case can be made.

The delivery of bridges differs from those identified in the Old Oak West SPD.

- 5.17 The Illustrative Masterplan maintains the SPD's objective of improving and increasing connectivity across the area.
- 5.18 It is proposed to re-align the East-West Bridge so that a more direct connection between the HS2 Park and Acton Wells Park is created, improving connectivity and reducing walking distances from Old Oak Common Station to the proposed town centre, North Acton and Park Royal. The Illustrative Masterplan also proposes a three-span bridge which removes the need for pedestrians and cyclists crossing Old Oak Common Lane as well as providing greater landscaping opportunities and aiding wayfinding and legibility. The proposal also enables a more effective interchange with the potential future Old Oak Common Lane Mildmay Line and West London Orbital station. Realigning the bridge would reduce the impact to Midland Terrace, but would have a greater impact on Wells House Road, including the demolition of two properties. Proposals for minimising and mitigating amenity impacts along Wells House Road include a new pocket park and landscaping.
- 5.19 Due to site constraints, the location of the proposed Channel Gate Bridge also differs from the indicative location in the Local Plan and Old Oak West SPD, however, the location is only indicative and more importantly the proposal in the Illustrative Masterplan provides the desired direct access into Channel Gate Park and responds to specific constraints.
- 5.20 The Local Plan and Old Oak West SPD identifies a new bridge connecting to North Acton Station. The Illustrative Masterplan has been developed in such a way to ensure that the delivery of this bridge is not precluded in the future however the Illustrative masterplan does not propose the bridge. We have undertaken analysis of movement and journey times as well as site constraints and have concluded that the benefits associated with the delivery of a new bridge are negligible. Instead, we are proposing public realm improvements to Victoria Road and Chase Road to create a high quality and safe pedestrian and cycle connections between North Acton Station, Old Oak Common Station and Park Royal.

6. Engagement

- 6.1 Since 2023, OPDC has also undertaken a programme of wider public and community engagement to raise awareness of OPDC and the regeneration for Old Oak, as well as activate community participation in the area. More recently, a series of workshops and in-person and online events has taken place on the

Spatial Principles and the Illustrative Masterplan, with further events programmed in the coming months.

- 6.2 There were over 120 attendees across these events held in May and June, which were specially focussed on the Illustrative Masterplan. Respondents valued spaces that are easy to move around, with shops, places to meet and things to do. People highlighted the importance of green spaces, community spaces, local events, food growing areas, markets and better access to the canal and also commented on the need for public realm improvements to feel connected to existing communities and respond to local needs. Safety, security and healthier high streets were also recurring themes, with concerns raised around traffic, parking and antisocial behaviour.
- 6.3 During this same period, we have also engaged with OPDC's Community Review Group and Place Review Group as well as other stakeholders including the Host Boroughs, the Greater London Authority and Transport for London. Overall, the feedback from stakeholders has been positive with general support for the approach to the quantum of development, the distribution of land uses, scale and massing as well as tall buildings subject to micro-climate testing. The landscaping and public realm strategy is also generally supported, as well as the improved connectivity across the masterplan area, however, it is important the connections to and from adjoining neighbourhoods outside the redline are considered. The promotion of ground floor activation and active frontages is also supported, together with the approach to character areas along Old Oak Mile, noting that the delivery of the Old Oak Mile needs to be carefully considered to ensure it is successful.
- 6.4 A focused period of pre-application engagement has taken place with the LPA between November 2024 and June 2025. The LPA reported the Illustrative Masterplan to OPDC's Planning Committee on 19 June 2025 where the committee was invited to note the Illustrative Masterplan and to raise any queries with officers at the meeting, and to provide informal comments on it to inform discussions between the LPA and the Delivery Team. A summary of the Planning Committee's comments is reported in agenda item 7.
- 6.5 The engagement with the LPA has been broadly positive including the proposed policy deviations, noting that there are some areas that will need to be developed and discussed further in the preparation of the Masterplan Framework and any future planning application.
- 6.6 The Officer's report to the Planning Committee noted that:
- "There are some areas where the Illustrative Masterplan deviates from the Local Plan and the Old Oak West SPD. However, subject to further justification on these areas which will be provided in due course, overall it is considered that when assessing the masterplan as a whole and taking into account the benefits of the scheme which will be confirmed at a later date, the Illustrative Masterplan is capable of being in accordance with the Local Plan when the development proposals are considered in the context of future planning applications."*
- 6.7 The feedback received has helped refine the Illustrative Masterplan but will also inform the preparation of the Masterplan Framework and development principles and guidance. However, it is noted that there are some points of detail that can

only be addressed through detailed design proposals and future planning applications.

7. Risks and issues

7.1 A summary of key risks and mitigation is set out in the table below:

Risk description	Inherent Score	Mitigations	Target Score
The Illustrative Masterplan and Masterplan Framework are not supported by the LPA and stakeholders	Likelihood: 3 Impact: 4 Total: 12	Extensive pre-application engagement has already been undertaken in the preparation of the Illustrative Masterplan and where appropriate, feedback will be reflected in the preparation of the Masterplan Framework.	Likelihood: 2 Impact: 4 Total: 8

8. Equality comments

8.1 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.¹

8.2 The Illustrative Masterplan is a spatial representation of how comprehensive regeneration of Old Oak can be delivered and make a significant contribution to housing delivery, including affordable housing, and economic growth and social infrastructure as well as improving the public realm, open space and connectivity in the area. The Illustrative Masterplan therefore supports a number of strategic objectives set out in OPDC's Equity, Diversity and Inclusion Strategy and in particular, planning for a welcoming and inclusive place.

8.3 In preparing the Illustrative Masterplan, the engagement programme has provided a range of opportunities to for feedback from the local community, including under-represented groups. These have included PlaceLabs, workshops, drop-in sessions and exhibitions which have been held in person and online.

¹ 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.

9. Financial implications

- 9.1 The cost of the Illustrative Masterplan and Masterplan Framework is funded from the Delivery budget for 24/25 and 25/26.

10. Legal implications

- 10.1 The Delivery Team has prepared the Illustrative Masterplan as the basis for the preparation of a Masterplan Framework, which will inform any future planning application (s) at Old Oak. The LPA is responsible for the formulation of planning policy and the assessment and determination of planning applications. As set out in section 6 of this report, the LPA considers that the Illustrative Masterplan is capable of being in accordance with the Local Plan when the development proposals are considered in the context of future planning applications and taking account of the benefits of the scheme which will be confirmed at a later date.
- 10.2 Endorsement of the Illustrative Masterplan will also demonstrate that the Board is satisfied that the Illustrative Masterplan is in general accordance with the planning framework for the area, which is a key requirement of paragraph 13.3 of the MHCLG Guidance on the Compulsory Purchase Process.

11. Conclusion and Next Steps

- 11.1 The Illustrative Masterplan demonstrates how the Strategic Objectives set out in the OBC and OPDC Regeneration Strategy could be achieved. It demonstrates the scale of regeneration benefits that can only be achieved through the comprehensive planning and development of Old Oak. Endorsement by the Board of the Illustrative Masterplan is an important step to delivering this as well as enabling delivery at pace. It will support the proposed compulsory purchase order for Old Oak. It will also inform any future planning application and set out a clear direction of travel to support the procurement of a development partner.
- 11.2 Subject to the Board's endorsement of the Illustrative Masterplan, it will form the basis for identifying development principles and guidance for inclusion in the Masterplan Framework, which could include layout, land use, distribution and indicative development quantum, scale and massing, open space, landscape and public realm.
- 11.3 In preparing the Masterplan Framework, we will continue to engage with the LPA, stakeholders and the local community. A further phase of community engagement is planned for the July to September 2025 through a series of workshops where we will invite input into the Masterplan Framework.
- 11.4 The Masterplan Framework will be reported to the Board later this year.

Appendices

Appendix 1: Old Oak Illustrative Masterplan

Background papers

None

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