

2026 -  
2040

# Draft Old Oak Neighbourhood Plan



Pre-submission Consultation  
Version April 2026

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Following an initial stage of pre-submission consultation, the Old Oak Neighbourhood Forum will be submitting to OPDC three separate documents:	
a) A Consultation Statement setting out responses to the first stage consultation and the Forums responses to these	
b) A Basic Conditions Statement setting out how the Draft NP meets these	
c) A revised Submission Version of the Draft Neighbourhood Plan	

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## OLD OAK NEIGHBOURHOOD PLAN 2026-40

*The first part of this Draft Plan explains the unusual context in which this neighbourhood plan has been prepared. These initial pages explain why the Old Oak Neighbourhood Forum has prepared this updated Draft Neighbourhood Plan.*

*The Forum (OONF) has been working for a decade to try to influence the plans of the Old Oak Development Corporation for this part of West London. We have 150 members and work with the local residents associations in the area, the Grand Union Alliance the Old Oak Alliance, as well as the other neighbourhood forums and amenity organisations such as Ealing Matters and the Hammersmith Society.*

*We believe that there could be an alternative to the 2025 OPDC Masterplan Framework for the eastern end of Ealing Borough.*

*This OPDC plan proposes high density high-rise housing for this part of Ealing. The Development Corporation took over planning powers from Ealing, Brent and Hammersmith & Fulham Councils back in 2015. At that time a new ‘vision’ for Old Oak was drawn up by the then Mayor of London. This was for ‘transformational’ regeneration that would result from the ‘catalyst’ effect of building the HS2 rail interchange at Old Oak Common.*

*This location was hailed as becoming the ‘best connected’ place in the UK if not the whole of Europe and therefore a magnet for investment in new development.*

***This £1.7bn station was originally due to open this year (2026). Subsequently the timeline shifted to 2029-2033. News of an opening date now awaits the outcome of the ‘reset’ of the HS2 Project. The project was cut back in 2023 and now consists of a high speed rail line between London and Birmingham. The tunnels to connect Old Oak Common to Euston are underway. When a Euston terminus will be built, and how it is to be funded, remains another unknown in April 2026.***



*Image of ‘Old Oak major town centre’ at Acton Wells, from the OPDC Masterplan*

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*After a decade of following every step of the plans of OPDC, we are not convinced that the Development Corporation is following the right path. We see 2026 as a critical moment when there should be wider public debate on the OPDC Masterplan, before decisions are made on the selection of one or more ‘development partners’ to enter into joint ventures with the Corporation to build what many local people see as ‘more of the same’ as at other regeneration areas across London.*

*‘More of the same’ as at the North Acton Cluster which few see as a world-leading example of urban renewal. More of the same as has been built in many of London’s 47 Opportunity Areas. There is growing evidence that Londoners do not want this outcome. In 2026 property values of new build studios and 1-2 bed in high-rise blocks in London are falling unexpectedly fast – even with the city’s housing shortage*

*The Old Oak Neighbourhood Forum will be submitting this Draft Neighbourhood Plan to the OPDC after an initial period of informal consultation. **We hope that it will gather support from local people and other consultees, at this first stage.** OPDC will then be required to publish it on its website for a formal 6 week consultation. It will then be ‘independently examined’ to see if it meets the legal requirements for adoption as part of the statutory development plan for this eastern part of Ealing (this being the OPDC 2022 Local Plan).*

*If successful at Examination, a local referendum would be held. If supported by more than 50% of those on the electoral register in the neighbourhood area, OPDC would need to bring the neighbourhood plan into force and to use its policies when deciding planning applications within the Old Oak neighbourhood area (map on page 12).*

*One of the several reasons why we are progressing this neighbourhood plan is because the OPDC’s Masterplan Framework has **not** been prepared, consulted on or ‘examined’ as a development plan document. It is a prospectus or ‘guidance’ that OPDC hope will attract interest from developers. But this guidance offers limited certainty for developers that sites will gain planning consents that reflect the imagery and text in the ‘Framework’. The next OPDC Local Plan, on which work is now getting underway, is not timetabled for adoption until December 2029. **Meanwhile the 2022 Local Plan remains the statutory policy context to which planning applications must comply.***

*The Old Oak Common rail interchange may not be operational until the late 2030’s or early 2040’s. Passenger forecasts and a ‘strategic transport study’ of travel patterns around the station have not been updated since 2015. We think it is a mistake for OPDC to proceed with its plans for car-free and very high density housing until the impact of the station becomes clearer. Whether it is to be an ‘interchange’ or a London terminus for HS2 seems to us a fundamental issue.*

*The OPDC has borrowed over £300m to acquire a series of development sites at Old Oak. The HS2 construction compounds will also be released for development in phases. Again, no one now knows the timing and phasing of release of these sites.*

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*Our Draft Neighbourhood Plan makes the case for building swiftly on the newly acquired OPDC land, but for building mid-rise housing rather than tower blocks, planned at density levels considered ‘medium to high’ rather than the ‘superdensities’ that the Masterplan images suggest. We think that that the next London Plan, being consulted on this summer, will include new housing policies that move in this direction. **If nothing else, we hope that consultation and public debate on this Draft Neighbourhood Plan will give local people the chance to question and challenge OPDC’s assumptions and proposals.** Ealing is at the final stages of adopting a new Local Plan, after years of consultation. This will show the eastern end of the Borough as a blank space on the map.*

## **1.0 The context for this draft neighbourhood plan**

1.1 The first half of this document sets out the history of OPDC plans for this part of London, the technical and legal aspects of preparing a neighbourhood plan, and the reasons why the Forum believes this Plan should progress to Examination and adoption. Much of this content will be transferred across to the Basic Conditions Statement which will form part of our submission to OPDC. **For those more interested in the specific proposals policies and site allocations which will form the submission version of the Draft Plan, please skip forward to Chapter 4 on page 29.**

1.2 For new readers, a reminder that on April 1<sup>st</sup> 2015 the OPDC became the planning authority for parts of the London Boroughs of Hammersmith & Fulham, Brent, and Ealing.

1.3 In November 2015 an Opportunity Area Planning Framework was published by the then Mayor of London. In his introduction, Mayor Boris Johnson stated that *Old Oak and Park Royal will play perhaps the most crucial role of any regeneration area in London over the next 20 to 30 years in delivering these much needed new homes and jobs.*

1.4 A decade later the full potential of the Opportunity Area remains uncertain. The HS2 project was due to be completed by 2026 with Old Oak Common station opening as a new rail ‘superhub’. The ‘connectivity’ of this West London location was to be transformed, as the only place where HS2 would meet GWR and Crossrail lines.

1.5 In 2023 that part of the HS2 project north of Birmingham was cancelled. The remaining HS2 proposals have been undergoing a ‘comprehensive reset’ since June 2025, with the outcome of this review due in mid 2026. While the Government has made commitments that the HS2 line will continue from Old Oak Common station to a new terminus at Euston, as yet there are no firm or funded plans for this to happen. Whatever the outcome of this decision OOC station (assuming completion) will be the London HS2 terminus until Euston platforms are operational.

1.6 The 2015 Mayoral vision of a rail interchange acting as the ‘catalyst’ and driver of investment and regeneration at Old Oak **now has to be seen in a very different light.** The OPDC area continues to play a part in strategic ambitions for regeneration across

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London but can no longer be said to be the ‘*most crucial*’ amongst London’s 47 Opportunity Areas. Plans proposed for the New Towns at Thamesmead and Crews Hill will involve fresh thinking on what forms of building typology will prove most sustainable and successful as ‘urban extensions’ for the capital. Planners at the MHCLG and GLA, along with other bodies are looking at examples in other major European cities<sup>1</sup>

1.7 For the Old Oak area, a truncated HS2 line may or may not prove to be much of a ‘catalyst’ by the time it is in operation. The impact of new development around Elizabeth Line stations in Ealing and westwards will long have made itself felt in terms of attracting investment.

1.8 As part of preparatory work on the next London Plan, the GLA published in June 2025 a set of ‘pen portraits’ assessing the progress since designation of each of the capital’s Opportunity Areas. The summary for the Old Oak and Park Royal OA is shown below.

1.9 This GLA analysis placed this Opportunity Area in the category of ‘*Moving Forwards*’. This is a move two levels upwards from ‘Nascent’ in the previous assessment. The justification given this uplift is limited, saying *a lot of development sites have been allocated and pre-planning is going on for approved sites*. The reality has been that in the decade since the Mayoral Development Corporation began its work, progress on the ground has been much slower than anticipated. The Local Plan (originally due to be completed by 2017) was finally adopted in June 2022.

## Old Oak/Park Royal

### Moving forward

**Homes Delivery**


- Since the establishment of OPDC, 4,307 homes have been completed. 2,854 homes have been completed since 2019/20.
- The OA has a pipeline of 7,852 new homes.
- Considering the completions and pipeline, the OA is meeting 78 per cent of its 10 year capacity. Current completions alone account for 11 per cent of the London Plan 22 year capacity and 20 per cent of the 10 year capacity.
- The OA large scale development sites are HS2 construction sites. The delay to HS2 alongside wider market factors has influenced the rates of delivery.
- 31 per cent is public land. OPDC is in the process of acquiring a number of sites in the Old Oak area.

**Jobs**

- The OPDC monitoring data shows a net gain of 190,249sqm industrial floorspace being achieved since 2015.
- OPDC currently developing economic vision, and will be updating its economic evidence base for its next Local Plan.
- The OA sits in the West Tech Corridor as identified in the London Growth Plan.
- Important to consider the role of the OA alongside the Heathrow narrative/ future OA vision.

**Proposition**

- Update status from ‘Nascent’ to ‘Underway’ as a lot of development sites have been allocated and pre-planning is on-going for approved sites.
- Continue to optimise deliver of homes and jobs through future updates to OPDC’s Local Plan and delivery of OPDC’s proposals for Old Oak.
- Joint working with OPDC, TfL and central Government to maximise benefits for London and Londoners.



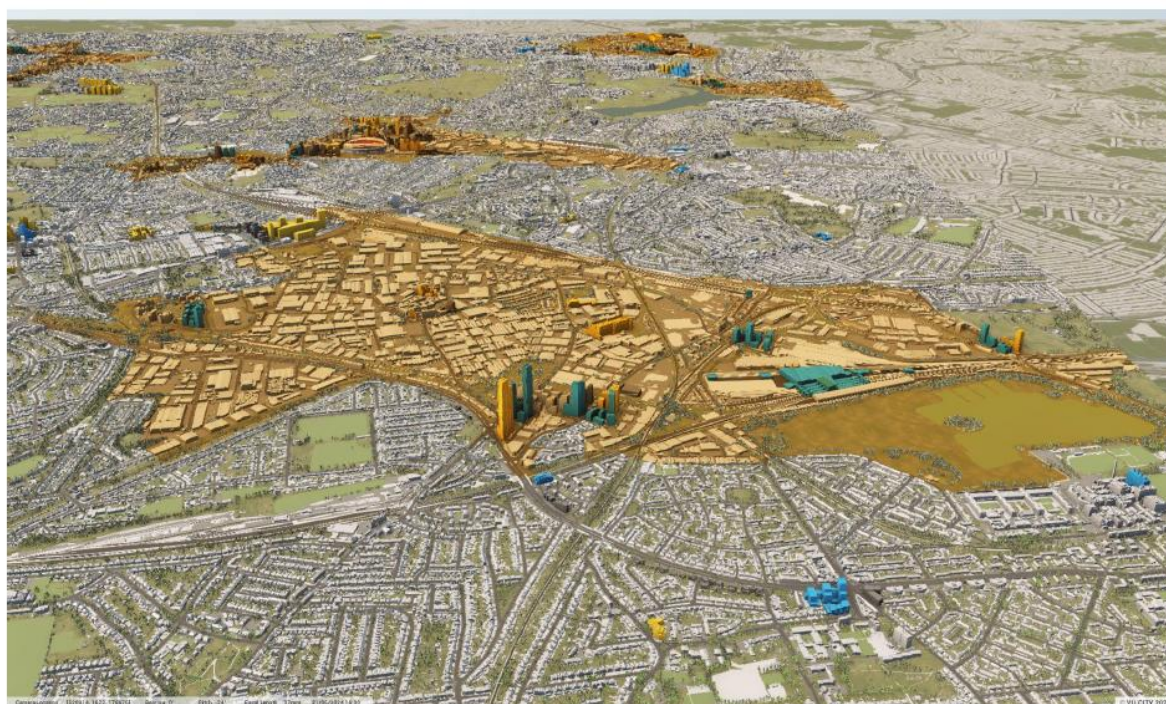
Source: Old Oak Common Station Plaza Gardens

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<sup>1</sup> E.g. [Trams and Towns: Learning from the French](#) March 2026 Create Streets

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1.10 New developments completed or consented to date in the OPDC area lie in a handful of locations as shown below. In terms of new housing built to date the main location is the ‘North Acton Cluster’ of apartments and student rooms at North Acton. In relation to the Old Oak neighbourhood area, the nearest completed development is at Oaklands Rise. Built by Notting Hill Genesis this includes a 28 storey towers and 605 apartments with a mix of social and market housing. The net residential density is 506 units/hectare, in the ‘super density’ range. When first marketed, these new ‘car-free’ flats were advertised as having a rail ‘superhub’ with Elizabeth Line platforms ‘on your doorstep’. As of 2026 the subsequent reality for residents is that even bus connections are limited. The location has very poor access to public transport.



Source: vu.city

KEY

- Consented
- Under Construction
- Completed
- Opportunity Area

Page 18 from the 2025 GLA pen portrait of the Old Oak and Park Royal Opportunity Area showing the VuCity model of development as at 2021.

**1.11 One of the aims of preparing this neighbourhood plan is to offer an alternative approach to high density high-rise car-free development being built long before the transport infrastructure is in place to support this building typology.**



*Oaklands Rise  
development  
(completed 2022)*

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1.12 Contrary to repeated claims by the Development Corporation, most of what is now defined as the Old Oak Masterplan area **is not at present a ‘well connected place’ in transport terms**. Local residents know this reality all too well, but we worry that both HS2 and OPDC describe the area as **already** having very good (or even ‘exceptional’ or ‘unparalleled’) transport links. Section 2 of this Draft Plan gives more detail. As measured by the new [Department of Transport ‘Connectivity Tool’](#) the designated Old Oak neighbourhood area has comparatively low scores for a location on the border of Inner London.

## **The legal framework for this neighbourhood plan – the Basic Conditions**

*(The following material is included as information on what can and cannot be achieved via a neighbourhood plan. This content will be transferred to a ‘Basic Conditions Statement’ as required to be submitted alongside a draft neighbourhood plan).*

1.13 Neighbourhood planning is governed by a statutory framework, laid down in the 2011 Localism Act and 2012 Regulations, as amended by subsequent legislation. There has been a recent significant change. As at March 25th 2026 (and as a consequence of sections 98 and 99 of the Levelling-up and Regeneration Act 2023) the previous Basic Condition requiring ‘general conformity’ of neighbourhood plan policies with the ‘strategic policies’ in a Local Plan has been replaced.

1.14 The new version sets a requirement that *‘the making of the neighbourhood development plan would not result in the development plan for the area of the authority proposing that less housing is provided by means of development taking place in that area than if the neighbourhood development plan were not to be made*. This reinforces Government’s wish to see neighbourhood plans deliver housing as a priority.

1.15 This is a significant shift in the Government’s approach to neighbourhood planning as compared with the previous weight placed on ‘strategic policy conformity’ with higher level plans (the Local Plan and the London Plan, in the case of the OPDC area).

## **The new National Planning Policy Framework**

1.16 The NPPF is the Government’s policy framework for the nation’s overall planning system. Consultation ended in March 2026 on a substantially revised version. This sets out in succinct form what a neighbourhood plan can and cannot do, as below:

*1. Neighbourhood plans allow local communities to plan positively for their areas by identifying and addressing community priorities that can be met or supported through the planning system. They should do this by:*

*a. Allocating land to meet the development needs of their designated area, where it is appropriate to do so; and*

*b. Setting out policies which address particular local issues, these should relate to site specific matters or, where appropriate, may cover wider issues such as the provision of infrastructure and community facilities, regeneration opportunities, design*

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requirements (including design codes), local environmental improvements and the conservation of local heritage assets.

2. Neighbourhood plans should not promote less development than provided for in other parts of the development plan for the area.

1.17 Ever since its 2018 version the NPPF has also included a requirement on the local planning authority to set a Housing Requirement figure for any neighbourhood plan within its administrative area.

### The OPDC Housing Requirement Note

1.18 Following a meeting with OPDC planning officers on March 6th, OPDC provided a note setting out this Housing Requirement figure along with background as to how it has been calculated. This note is attached in full as Annexe A to this draft neighbourhood plan.

1.19 The OPDC's stated requirement is for a minimum of **510 new homes** across the five development sites that lie within the Old Oak neighbourhood boundary. The Note breaks this down as below:

*Table 2: OPDC Local Plan site allocations and development sites*

Site	Site reference	Minimum homes capacity
Goodhall Street East	DCS site 54 (part of)	42
Ursula Lapp	DCS site 55	250
Lords Builders Merchants	Site allocation 26 (part of)	158
Old Oak Cafe (2 Victoria Terrace)	DCS site 16	10
Midland Gate	DCS site 30	50
<b>Total</b>		<b>510</b>

1.20 The Forum is in discussions with OPDC on the validity of this Housing Requirement note. Of the five sites listed, only Lords Builders Merchants appears in the schedule and map of site allocations in the 2022 adopted Local Plan (the Lords site being part of site 26 Channel Gate).

1.21 The remaining four sites feature in a 2021 Development Capacity Study prepared as part of the evidence base for the Local Plan. This study assesses 'deliverability' of 63 possible sites in the OPDC area and gives site areas and housing numbers. But our understanding is that **a Development Capacity Study does not form part of the development plan and therefore the housing numbers shown in this document do not constitute 'housing proposed' for the purposes of the new Basic Condition introduced under sections 98 and 99 of LURA 2023.**

1.22 **Hence the eventual 'making' (adoption) of this neighbourhood plan by OPDC would not (in our view) breach the new Basic Condition. Nor would it promote less development than provided for in other parts of the development plan for the area.**

Four of the five development sites in this neighbourhood plan are **not allocated** in the 2022 Local Plan. They are included in a Development Capacity Study which is part of evidence base for the Local Plan, but our advice is that such a study is not part of the

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statutory development plan. **The new Basic Condition would therefore be satisfied if this draft neighbourhood plan is progressed to adoption by OPDC.**

1.23 The four sites in question (Ursula Lapp, Goodhall Street East, Old Oak Café (Victoria Terrace) and Midland Gate) feature in Table 12.1 and the map a Figure 12.4 of the Old Oak West SPD. But without site allocation numbers and with notes in each case reading ‘*not a site allocation*’. As a Supplementary Planning Document giving ‘policy guidance’ and not creating ‘new policy’ this material **is not part of the development plan and hence not relevant to the new March 2026 Basic Condition.**

1.24 The OPDC 2025 Masterplan Framework document also includes these development sites with illustrations of what buildings might be built on them. In Chapter 5 of the Framework document, these sites are shown as being amongst 13 ‘Development Zones’. But as the Forum has repeatedly pointed out to OPDC in recent months, this document has not been prepared as a development plan document (with the statutory public consultation and examination that is required by the Planning and Compulsory Purchase Act 2004). **Hence the Framework document is also not relevant to the March 2025 Basic Condition.**

1.25 This legal position has arisen as a result of previous OPDC choices not to prepare its Old Oak West SPD and the latest Masterplan within the statutory framework that applies to development plans. The Forum continues to question why these choices were made, in our correspondence on the status of the Masterplan Framework. Relevant correspondence is [here on our website](#). For the time being we have had to ‘agree to disagree’ with OPDC on the subject of the ‘material weight’ that should be given to pronouncements in the Masterplan Framework document. We see it as a prospectus aimed at developers will carry limited ‘material weight’ when planning applications are decided. OPDC has declined to provide their legal advice on this subject.

1.26 Unless OPDC provide authoritative legal advice that we are wrong in interpreting the new NPPF and Basic Conditions in LURA 2023, **the Forum will progress this draft neighbourhood plan on the basis that all of the Basic Conditions will be met and with the previous ‘general conformity’ test no longer applying.** The total Housing Requirement set by OPDC should be no greater than the **158 figure for the Lords site**. The site allocations in this Draft NP (with maximum net densities and building heights specified) would deliver well in excess of this figure. The Basic Conditions Statement, required to be included alongside formal submission of this Draft Plan to OPDC as the local planning authority, will set out our legal reasoning at greater length.

### **The transport context for this neighbourhood plan**

1.27 The OPDC Strategic Transport Study which formed part of the evidence base for the OPDC Local Plan dates back over a decade to 2015. There has since been no modelling data available in the public domain, on numbers of HS2, GWR and Elizabeth Line passengers forecast to use OOC station as a destination or departure point, rather than as an interchange at which to continue their journey. Since 2022 OPDC/TfL/GLA

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have between them commissioned further transport modelling at a cost of £420,000. None of the results are yet available to the public.

1.28 In the long term, a rail interchange will have a different impact than a station which acts as a HS2 terminus. Whether the Old Oak area is to be regenerated as a ‘destination’ or as a transport ‘interchange’ is a fundamental decision that we think needs debate - **before** the scale and density of development around the new station is locked into Joint Venture agreements with development partners.

1.29 The [original planning framework for the Opportunity Area](#) envisaged a much improved local road network with several new east-west road connections. These included a proposed ‘Wormwood Scrubs’ street extending eastwards to open up the Kensal Canalside Opportunity Area. In 2026 **no such transport improvements have a firm or funded place within the Local Plan period 2028 – 2038**. More details of the transport context for this neighbourhood plan are at 2.44 below.

### OPDC Land Assembly

1.30 In the past 18 months OPDC has acquired substantial landholdings within the Old Oak project area. These lie alongside the four major sites owned by DfT and in use as HS2 construction compounds. These land assets OPDC has either acquired outright or has taken control of the companies involved. The expenditure involved (now over £300m) has been financed mainly through loans from [Greater London Land and Property Limited \(GLAP\)](#). This body hold property assets on behalf of the Mayor of London.

1.31 At the start of its life in 2015, OPDC was not provided by the then Government with any capital budget for land assembly. The assumption was that development would proceed via funding from increased land values created by OPDC’s planning functions. A new Local Plan, including the release of Strategic Industrial Land for higher value residential use, was expected to generate substantial capital resources

1.32 In March 2019 OPDC [‘welcomed’ an award of £250m of Housing Infrastructure Funding from Government](#). This turned out to be a ‘provisional award’ on which OPDC subsequently failed to meet the MHCLG grant conditions on delivery of homes. The HIF grant was cancelled <sup>2</sup>.

1.33 In 2026, OPDC’s ambitions for its Masterplan Framework remain highly ambitious and continue to be based on the ultimate 25,000 housing target for the Opportunity Area. The Forum has always argued that this housing figure was inadequately researched prior to its inclusion in the London Plan and should be revised downwards to 15–18,000 new homes. The Masterplan area is planned to deliver 8-9,000 new homes, which we consider would involve densities and building heights which do not represent sustainable development in the long-term and are wholly unsuitable for the period

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<sup>2</sup> See the London Assembly Budget and Performance Committee [2021 report](#) on this period of OPDC’s history. This concluded that *OPDC has spent £42.7 million, even though five years on, little has been done on the ground to bring any new jobs or homes to the area.*

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2026-40. **Old Oak Common station will not be providing public transport links for most (if not all) of this period.**

1.34 The OPDC [Outline Business Case](#) (OBC) agreed with Government (and underpinning the Masterplan) dates from 2023. Events have moved on since then, with the HS2 reset. The OPDC Board has held no serious discussions (at those parts of its meetings which are open to the public) on the impact of the further delays to HS2 or whether plans for the surrounding area should assume one of two possible scenarios

- a) Old Oak Common as a terminus and a new West London destination? Or
- b) Old Oak Common as rail interchange with a Euston terminus by the 2040s?

**1.35 We see these alternatives scenarios as leading to sharply different long-term outcomes. It will be the Borough Councils which inherit these outcomes. Ealing and to a lesser extent Brent and LBHF will be dealing with the consequences that can arise from misguided plans that lead to housing being built in advance of other amenities or attempts to create a 'major town centre' which fails to attract more than a limited retail offer with no cultural or leisure activities. What has emerged at North Acton in the past decade, under OPDC planning powers, does not set a successful precedent.**

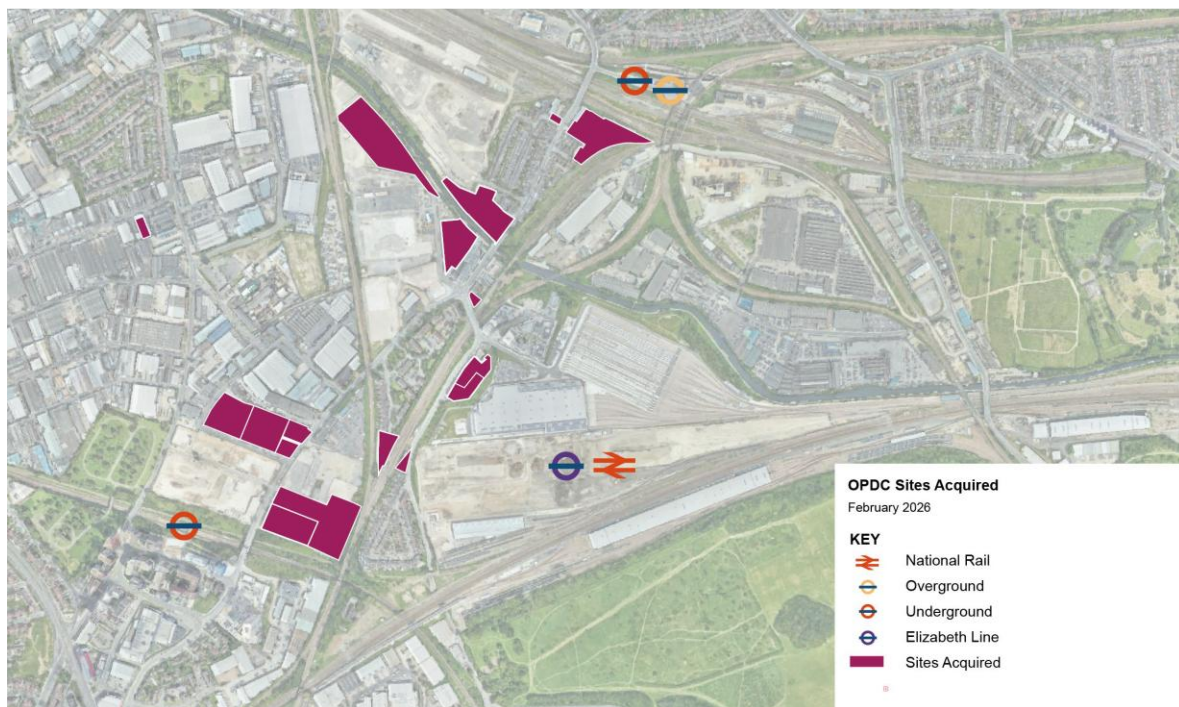


Figure 3 OPDC map of land assembly March 2026)

## The OPDC Compulsory Purchase Order

1.36 In preparation for entering into Joint Venture agreements with developers, OPDC finalised an extensive [CPO Order](#) in September 2025, potentially enabling compulsory purchase of further sites within the project area which remain in private ownerships.

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This CPO Order will ultimately be decided by the Secretary of State, with a public inquiry likely in autumn 2026 to consider objections submitted.

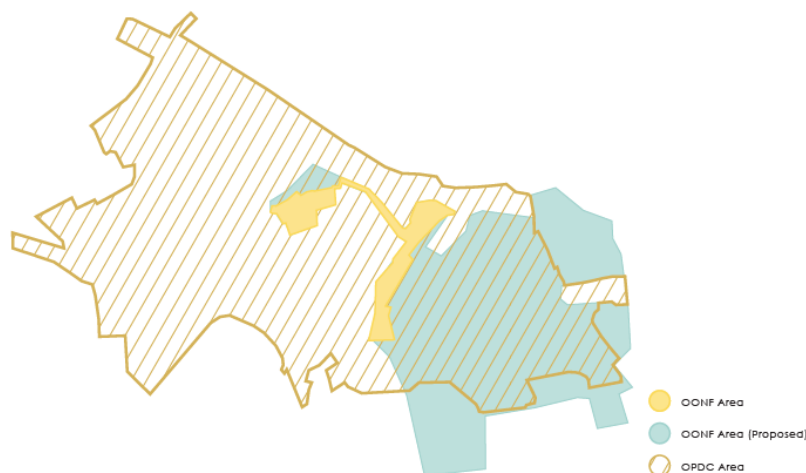
1.37 It is known that there were some 40 objections to the CPO Order. These include one from the Old Oak Neighbourhood Forum. This [objection](#) argues that OPDC's strategy of proceeding 'at pace' with CPO proposals is flawed and that implementation of any Order should await the Government's decisions on the HS2 reset.

## **CHAPTER 2 In this much changed context, what part could realistically be played by an Old Oak neighbourhood plan?**

### **The geographic extent of the designated Old Oak Neighbourhood Area**

2.1 When the Old Oak Neighbourhood Forum first established itself as an 'interim forum' back in 2016, we applied to OPDC for a very large neighbourhood boundary covering the eastern half of the OA along with several residential settlements just outside the Development Corporation boundary (the area shown in blue on the map of the OPDC area shown in blue below). OPDC rejected this proposal and chose in 2017 to designate a much smaller 22 hectare in East Acton (shown in yellow).

Figure 1.4 OPDC and OONF boundaries



*Map showing original neighbourhood area applied for in 2027 as compared with that designated.*

2.2 This designated boundary (now slightly varied following an OPDC decision in 2021) is shown at Figure 1 overleaf. This designation remains in force as of 2026. An unintended consequence of OPDC's 'change of direction' in 2019 has been that the neighbourhood area lies within what OPDC has since defined as 'Old Oak West' and more recently the 'project area' for the Development Corporation's Masterplan Framework.

2.3 OPDC has to date remained dismissive of ideas that neighbourhood planning, the most local and community-influenced layer of England's national planning framework, could play any useful part in the regeneration of Old Oak.

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2.4 The Forum has previously argued that the speed with which NP policies and site allocations can be brought into force (as compared with the local plan process) could prove useful in certain contexts. Once adopted by the relevant local planning authority, neighbourhood plans form part of the development plan for an area. **Crucially, neighbourhood plan policies and site allocations carry the same statutory weight as those in a Local Plan (unlike ‘principles’ in a SPD of non-statutory masterplan.**

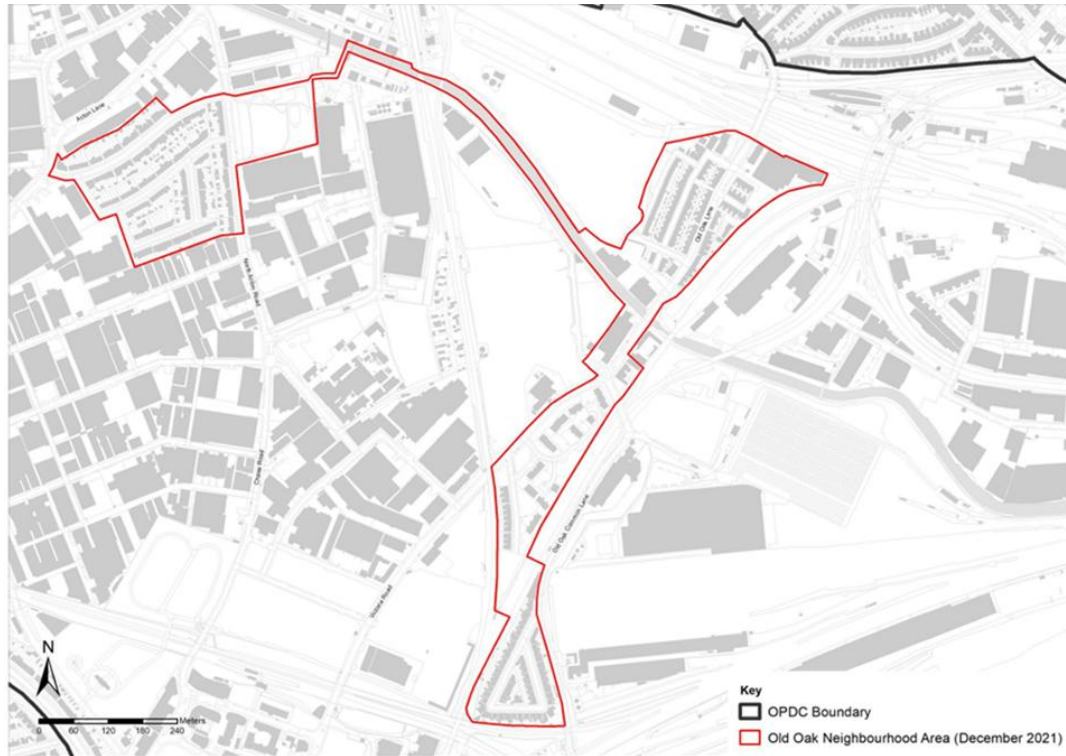
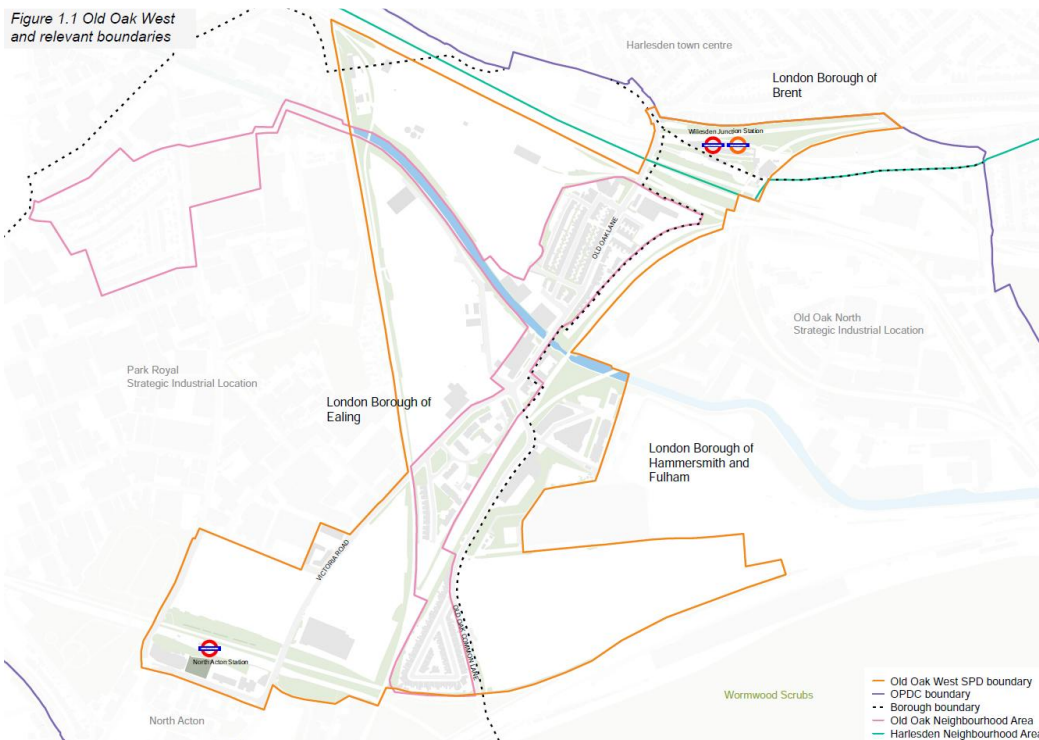


Figure 1 Old Oak Neighbourhood area boundary as designated by OPDC in 2021



The orange boundary is that introduced by OPDC for the Old Oak West SPD.

This document sought to present a spatially coherent area on which OPDC would focus following its ‘change of direction’ to the ‘Western Lands’ in 2019,

The SPD area includes part of what are 4 different ‘Places’ in the 2022 OPDC Local Plan.

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Figure 2 boundaries in the Old Oak area (LBE, LBB and LBHF bough boundaries shown as dotted lines)



Figure 3 Image of future development in the OPDC Masterplan Framework area November 2025

2.5 In 2021, the Forum applied to OPDC [for an extension of the designated neighbourhood area boundary](#) to include the land at Channel Gate and Atlas Road. Our application argued that this could provide a ‘Plan B’ route enabling OPDC to put in place fresh site allocations and policies at a time what the Corporation’s Post Submission Draft Local Plan was undergoing extensive modification by the Planning Inspector (with consequent delays).

2.6 The Forum’s application to extend the neighbourhood boundary from OONF was ‘refused’ by OPDC in November 2021. The slightly modified boundary was designated as shown in Figure 1 above.

2.7 This latest 2026 version of a Draft Old Oak Neighbourhood Plan builds on a version first published on the OONF website in 2019 and updated in 2021. The Forum did not progress earlier drafts to the stages of submission and public consultation by OPDC, given that there was no adopted Local Plan at that time. Since 2021, the continued uncertainties over HS2 plans and timelines have not provided a settled context in which to progress a neighbourhood plan.

2.8 Following OPDC’s publication of its Masterplan Framework in November 2025, we saw renewed potential in finalising and submitting to OPDC an updated draft neighbourhood plan for the area as designated by OPDC in 2021. In parallel to the OPDC formal consultation stage on this 2026 version, the Forum will be applying for

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extensions of the neighbourhood boundary, in order to align this more closely with the Old Oak project area.

2.9 Our reasoning for taking these two steps is set out below:

- As noted above, the neighbourhood area designated by OPDC in 2017 (and modified slightly in 2021) lies within the area covered by OPDC's new Masterplan Framework. So a neighbourhood plan can be relevant to next steps on OPDC delivery.
- The Old Oak Neighbourhood Forum was designated by OPDC in 2018, and redesignated five years later in 2023, following [continued support at a public consultation](#). We believe that this draft neighbourhood plan will also attract support from those who wish to see an alternative future to the Masterplan Framework for this part of London.
- Although the neighbourhood boundary remains tightly defined and includes only a limited number of potential sites for development, the five sites involved are significant to the future urban form of East Acton.
- As an alternative way forward, this draft neighbourhood plan proposes a suite of policies and site allocations reflecting lower density housing with more emphasis on family homes. Given the HS2 reset and a late 2030s/early 2040s date for OOC station to open, we question OPDC's continued pursuit of '*transit-oriented high-density*' housing, car-free and reliant on public transport. This approach was pursued in 2015 OAPF and first iteration of an OPDC Local Plan. But events have moved on and a rethink is needed.
- There is growing recognition of changes in London's housing market. Market demand for small flats for sale has plummeted, following the demise of Help to Buy and sharply falling values for new builds<sup>3</sup>. The Built-to-Rent model (BTR) has also become unviable in many parts of London, as result of rising construction costs<sup>4</sup>.
- The precise extent of OPDC's reliance on the BTR model to deliver the 2025 Masterplan remains an unknown until the content of OPDC Joint Venture agreements is known. We believe that BTR schemes will still feature significantly. The completed development at [North Kensington Gate](#) was built By City & Docklands for market sale of apartments. As a result of poor sales this residential tower has been relaunched as '*an iconic new rental development*'.
- In the current struggling market, Purpose Built Student Accommodation (PBSA) and co-living schemes are being used to prop up viability on developments. Imperial College is seeking consent to reduce the housing content of the development at One Portal Way in favour of an extra 1,542 student beds. Our Forum has argued on two recent planning applications (from Imperial and from

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<sup>3</sup> 2026 [Financial Times](#) and [Daily Telegraph](#) articles

<sup>4</sup> [Building](#) magazine 18 March 2026. An article including the views of David Lunts, former CEO of OPDC.

Downing) that there is already an excessive over-concentration of students at North Acton<sup>5</sup>.

- A neighbourhood plan could provide scope for more direct forms of OPDC and GLA intervention, avoiding the complexities and risks of Joint Ventures and development partnerships. We are following the progress of the [£2 billion City Hall Development Fund](#).
- This neighbourhood plan suggests that new housing (and potentially employment space) could be built swiftly via a Mayoral initiative to use Modern Modular Construction methods at scale. This could exploit the potential of the DfT/HS2 construction compounds (and provide continued employment for the HS2 workforce).
- This approach would take account of LLDC experience in commissioning and supporting early phases of development at the Olympic Park, along with other interventions by GLAP (GLA Land and Property) as the GLA's commercial property arm.

2.10 Support from the three Boroughs and particularly Ealing would be key to such a change of approach by OPDC. The Forum will be seeking such support at this stage of pre-submission consultation on this draft neighbourhood plan. Speed of delivery of new housing on OPDC's acquired sites could reduce acute pressures on Housing Waiting Lists in this part of West London.

2.11 In early 2026 we see finalisation and submission to OPDC of a draft neighbourhood plan as a way for OPDC to keep some options open. The impact of the [MHCLG/Mayoral 'emergency package' of measures](#) to kick start housebuilding has yet to be tested. The outcome of the HS2 reset, and on a HS2 terminus at Euston, remain major unknowns. Confirmed proposals for two New Towns in east London<sup>6</sup>, and a Government decision to fund the DLR extension (but not yet the West London Orbital) may indicate that the 2015 theme of *The West is the New East*<sup>7</sup> has lost some market relevance<sup>7</sup>.

2.12 The worst of all worlds would be if much of the 70 acres of land held by DfT on behalf of HS2, along with the 80 acres expensively acquired by OPDC, were to sit vacant or half empty for the next 5-10 years. The neighbourhood planning framework offers comparative speed and flexibility in putting in place some varied development plan policies and site allocations.

2.13 We recognise that the OPDC Delivery team has reported strong levels of developer interest from its initial 'market engagement' in the lead-in to a 2026 procurement

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<sup>5</sup> LB Brent has recently introduced new policies to limit student numbers in the Wembley Growth Zone to around 20% and to resist further PBSA applications. Our figures for North Acton suggest that this location is heading for student numbers at 50% of the overall population.

<sup>6</sup> Crews Hill and Chase Park, Enfield (up to 21,000 homes) and Thamesmead, Greenwich (to 15,000 homes) are among the [seven New Town proposals being progressed by the Government](#) as of March 2026.

<sup>7</sup> Title of a major regeneration conference on the original 'vision' for the OPDC area.

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exercise. But any solid evidence of such interest remains hidden from the public and is discussed only in the confidential part of OPDC meetings. The concept of London's WestTech Corridor was heavily promoted at MIPIM in March 2025 by HS2 as the location of a £10bn 'development boom' by HS2. OPDC and landowners such as Imperial College joined in promotional activity by OPDC.

2.14 The OPDC Board meeting on March 26<sup>th</sup> noted that MIPIM 2026 was a more subdued event as a result of the Iran war. The Board was assured by the chair of OPDC's [Development, Investment and Sustainability Committee](#) that there was continued interest in development partnerships from the 'usual suspects' (whoever these may be). Local residents see little sign of a start on site for a series of schemes which have received full planning consent and have finalised their S106 Agreements with OPDC.<sup>8</sup>

## **What risks are seen by local people in delivery of OPDC's Masterplan Framework?**

2.15 Aside from the fact that developers may choose to look to other regeneration zones and Opportunity Areas for their investment, OPDC's Masterplan Framework departs in several significant respects policies in the 2022 adopted Local Plan. Some of these variations are mentioned in the final appendix of the document, titled ***Consideration against Planning Policy***. We think this analysis plays down the obstacles for any development partner in working to site allocations and 'development parameters' **which do not have development plan backing**. The Framework document does not make clear that the 2022 OPDC Local Plan site allocations and policies are those which will require policy compliance, when applications come to be determined.

2.16 The following chapters covering each of the 'sub-areas' in this draft neighbourhood plan identify situations where departures from Local Plan policy will arise if the Masterplan is used as the basis for development. These include sites newly identified in the Masterplan as Tall Building locations, with no development plan support for their suitability (contrary to London Plan Policy D9). Such situations will not go unnoticed by a vigilant public, as and when schemes for these sites come forward.

2.17 Our Forum has deeper concerns that OPDC's approach of progressing delivery ambitions via a non-statutory masterplan **will enable potential development partners to exploit the uncertainties involved in obtaining consents**, when it comes to negotiations on which side should bear these risks in any JV negotiations and development agreements.

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<sup>8</sup> See for details [Appendix 5](#) of the Planning report to OPDC Board March 26<sup>th</sup> 2026. This is the regular report of major schemes consented by OPDC and at pre-application stage.

**2.18 This is coupled with the growing level of debt on loans from GLAP which OPDC has taken out, to acquire sites. On several large sites the extent of ‘land value capture’ will be limited.** This is because the land in question was already de-designated from SIL via the 2022 Local Plan. Some of the larger sites recently ‘assembled’ by OPDC had already seen development proposals prepared by private sector applicants, and (in some cases) planning consent granted for high density housing<sup>9</sup>. These land acquisitions, financed from loans, have proved to be at high costs. Had they been made nearer the start of OPDC’s life (and when £250m of HIF grant was available) land costs would have been very different.

### **Housing capacities and density levels in the draft neighbourhood plan**

2.19 The Forum will be approaching the site capacities and densities proposed in this neighbourhood plan from **a different starting point to OPDC**. We will start from the **net residential density levels** which we consider will make for successful and sustainable development on each site for the plan period 2026-2040. These density figures will take account of:

- Site size and relevant geographic features
- Transport connectivity as at 2026 and likely to remain largely unchanged until the late 2030s/early 2040s -- as measured by PTAL levels and the new DfT Connectivity Tool.
- Proposals in the original Regulation 18 Draft OPDC Local Plan on areas of high/medium/low densities and ‘sensitive edges’ prior to the removal of these definitions and maps in later iterations of the local plan.
- Consultation responses on this Draft Neighbourhood Plan including those from the three Borough Councils, other statutory consultees, and local RAs and community groups.
- Relevant information that has arisen during consultation on the new local plans being prepared by LBHF and LBE (and near finalisation in Ealing’s case).
- Relevant proposals and recommendations emerging from the MHCLG New Towns Unit and from the London Assembly<sup>10</sup>, and work on the next London Plan.

2.21 OPDC’s 2022 adopted Local Plan has **no stated policies on housing density**. Most of the 77 references to ‘density’ in the Plan are to ‘high density’. There is one passage of text which reads as below as part of Strategic Policy SP9:

*The indicative density range is 300 to 600 units per hectare. However, local context, character and environmental impacts are important factors to consider in the design process meaning development will be expected to deliver a range of densities and building heights, for example, responding with lower densities and building heights close to more sensitive locations and providing increased densities and building heights away from these sensitive locations and in areas of high public transport accessibility. Where appropriate, the Places policies set out more specificity about*

<sup>9</sup> E.g. the site at Atlas Wharf changed hands in 2015 at a value *Between £200,001 and £500,000 on 30 July 2015*. Planning consent for a Build to Rent development with 457 homes was achieved by Pocket Living in late 2022 but was not progressed. OPDC obtained control of the site in 2024 at a cost understood to be £25m.

<sup>10</sup> [Between semis and skyscrapers](#). Report from the London Assembly Planning and Regeneration Committee making the case for mid-rise housing and the reinstatement of a Density Matrix in the next Londo Plan,

*appropriate building heights, but in many parts of the area, there is a need for flexibility in the approach to achieving homes and jobs targets (see Chapter 4).*

2.22 The Forum's June [2025 submission to the Mayor of London](#) on the next London Plan makes the case for a downward review of the 2016 and 2021 housing target of 25,500 new homes in the light of a changed context for the Opportunity Area since the days when this figure was first set.

2.23 It is this overall target figure has driven OPDC policies for a decade, with no apparent willingness by the Development Corporation to seek a downward revision each time plans for necessary transport infrastructure are scaled down, delayed, or deemed unfeasible because of geographic or other barriers to movement,

## **Key elements of this 14 year neighbourhood plan**

2.24 This NP proposes a 14 year 'plan period' from 2026 to 2040 with a view to revision every five years or after adoption of the next OPDC Local Plan (a date scheduled as December 2029 in OPDC's latest [Local Plan Interim Timetable](#)).

2.25 To rehearse briefly **why** the Forum is progressing this neighbourhood plan we see three main reasons:

- As the original prime mover for regeneration at Old Oak the HS2 project is in disarray and even the reset may not prove to the end of this story. In any event the 'catalyst impact' has moved back well over a decade from 2026 and has yet to be tested in terms of development interest in Old Oak as compared with other regeneration areas in London including the proposed two New Towns.
- We have serious hopes that the tide is turning on high density high rise in London, as it did in the late 1960s. The Old Oak neighbourhood area does not yet have the levels of transport accessibility that were assumed at the time when OPDC assessed sites included in the 2021 Development Capacity Study (including 4 of the 5 sites in this neighbourhood plan).
- The London housing market has changed substantially in terms of financial viability. We question why OPDC has not revised its thinking since the preparation of its Outline Business Case and Regeneration Strategy. A Mayoral Development Corporation, combining planning and delivery functions, is well positioned to be nimble and responsive to changed circumstances. We did not see this happen at the time when Cargiant withdrew its support for plans for Old Oak North in 2018. We have not seen it in response to the HS2 reset.

## **Scope for Modern Methods of Construction (MMC)**

2.26 The Government's response to the New Towns Taskforce points out that "*Large-scale new towns may also provide an opportunity for creating new on-site MMC production facilities, fostering innovation at the same time as creating local employment opportunities and skills.*

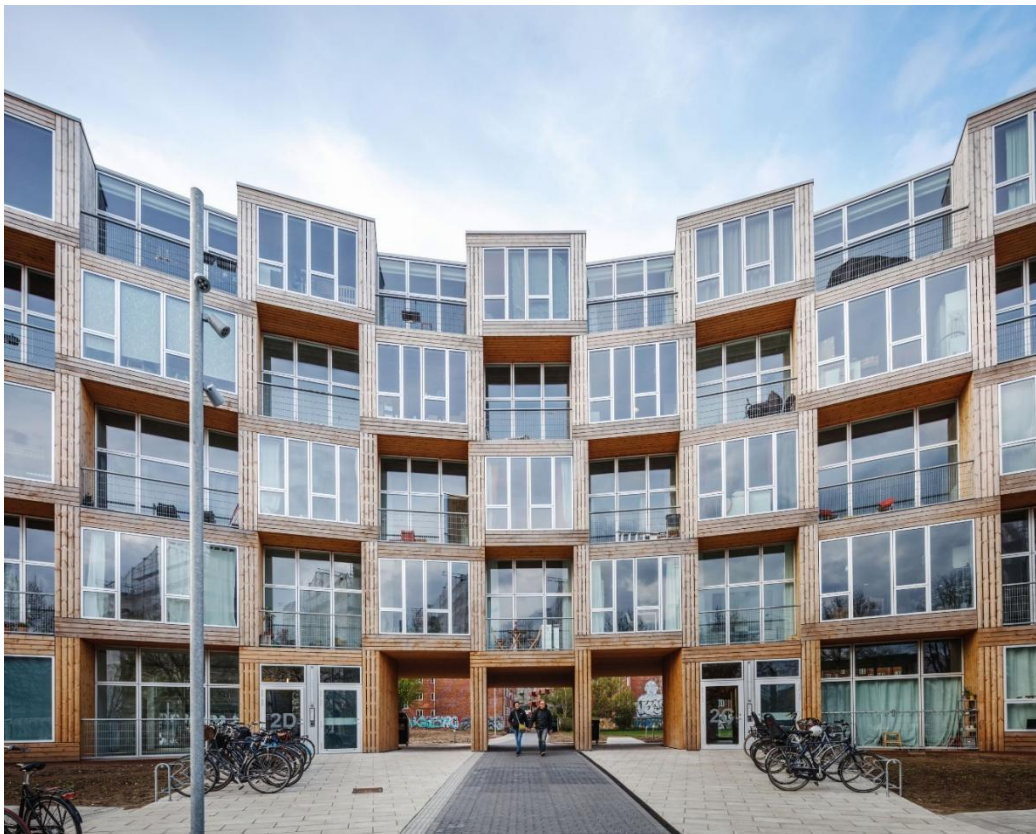
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2.27 As the HS2 construction compounds in the Old Oak project area begin to be released, these would make ideal sites for MMC production facilities. As a development corporation already established for a decade, OPDC (in conjunction with GLAP and GLA's Housing and Land Directorate) is well placed to build on LLDC experience to explore more direct delivery of new housing and piloting innovative models of MMC construction. OPDC's links with Homes England, a body already undertaking work on models of New Towns housing delivery, would assist.

2.28 Homes England explicitly states that part of its mission is to *help build a more resilient, diverse and innovative housing sector, encouraging Modern Methods of Construction (MMC)*. The [Lords Built Environment Committee 2024 report Modern methods of construction in the housing industry](#) was critical of the Conservative government's approach to MMC and called for a coherent strategy to promote MMC use in housebuilding. We think that use of MMC at scale at Old Oak, led by OPDC/GLA Housing and Land Directorate could be a valuable test bed.

2.28 There are examples of volumetric MMC being used in new buildings at North Acton (e.g. on the former Castle Hotel site). But these (and many others in London) are for co-living or student accommodation suited to repetitive stacked units in tall buildings. The Forum continues to seek out good examples of where MMC has been used for the lower parts of tall developments or for mid-rise housing (such as Pocket Living's Addiscombe Grove in Croydon).

2.29 Examples from Europe have yet to be replicated at any scale in London.



*Modular affordable homes in Copenhagen*

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## Key policies in this neighbourhood plan on affordable housing, net housing density and tall buildings

2.30 The [Government response to the New Towns Taskforce](#) notes the recommendation that *new towns will include the aim of a minimum of 40% for affordable homes of which half is for social rent*. The response also comments that *They should also be designed to sufficient density, with everything residents need within easy access, including public transport and vital social infrastructure such as schools and GP surgeries*.

2.31 We interpret use of the term ‘*sufficient density*’ as a recognition that the era of high-rise ‘superdensities’ and ‘hyperdensities’ in London’s Opportunity Areas and regeneration zones may have passed its peak – as happened with London’s first phase of residential towers in the 1970-90 period.

2.32 OPDC publishes no housing density metrics in its **Masterplan Framework** and has been reticent in response to questions as to what assumptions are being used by consultant architects Gort Scott for work on the Masterplan. OONF has been told (at the OPDC Residents Panel) that the proposals in the Masterplan Framework are premised on net densities of 350-600 dwellings/hectare (i.e. the very wide range also used in the 2022 Local Plan). The images in the document, with a significant proportion of high rise towers suggests sites developed at densities of 600dph or more.

2.33 Page 156 of the OPDC Masterplan Framework sets out defined height parameters for a set of tall building locations. These include four of the five sites in the Old Oak neighbourhood area (Ursula Lapp, the Lords site, Midland Gate and Goodhall Street) which are not included in areas labelled as areas where tall buildings are appropriate at Figure 3.15 of the OPDC Local Plan. Only 2a Victoria Road is within an area labelled in this way. **This neighbourhood plan proposes mid-range heights**. It is against the Local Plan content, and nor the Masterplan Framework, that an independent Examiner will be assessing the draft neighbourhood plan.

2.34 Our Draft Neighbourhood Plan is based on the principle that for the 2026-40 plan period Old Oak’s transport network and connectivity levels **will not support net residential densities above 350 units/hectare** except on those sites closest to Willesden Junction as a transport node where mid-range PTAL levels can be achieved<sup>11</sup>.

2.35 The 2016 Regulation 18 version of the Local Plan was more explicit on densities than the subsequent versions. It provided the map below, colour coded with definitions of what the LPA considered to be a range from ‘highest densities’ to ‘lower densities’ defined as below:

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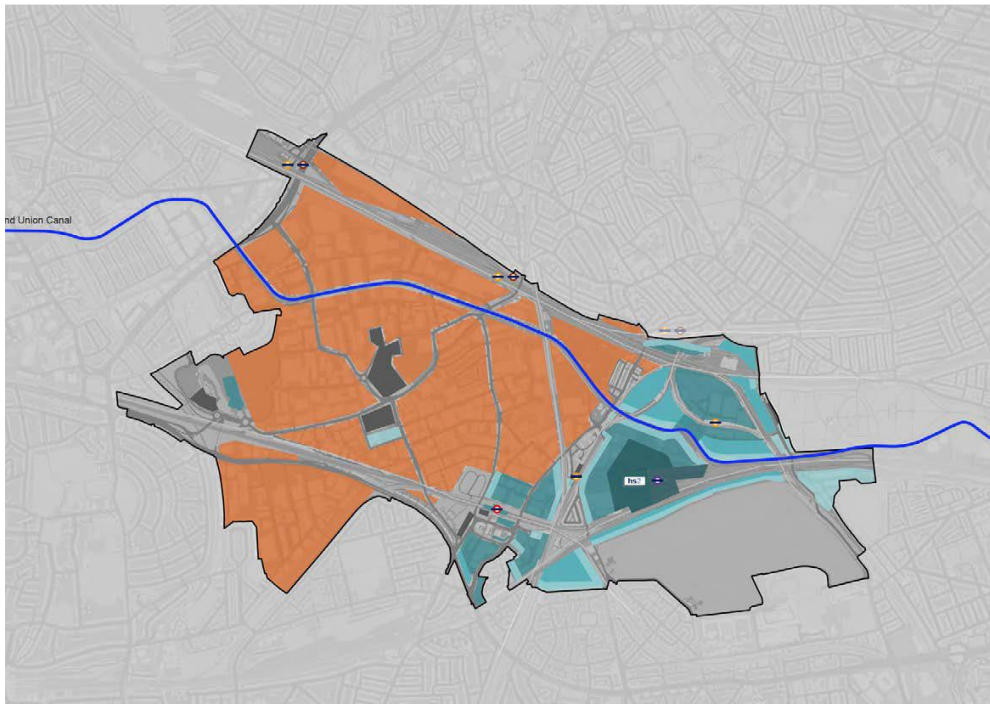
<sup>11</sup> The introduction to the 2015 report [Super Density the Sequel](#) noted *We show that densities up to around 350 homes per hectare can be achieved in this way (corresponding to the top of the London Plan Density Matrix at 1,100 habitable rooms per hectare for central well-connected sites). Above that, we believe there should be a presumption against development, and that any exceptions should be subject to much more rigorous impact testing.*

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2.36 The 'Preferred Policy' included at Regulation 18 stage was as below. This is close to what is now being proposed in the consultation version of the new 2026 NPPF, limiting the highest densities to locations around rail stations and at 'key destinations'. OPDC's 2016 draft policy wording read as below:

3.27 OPDC has developed a draft Development Capacity Study (DCS) for review and comment alongside this draft Local Plan. This sets out OPDC's draft housing trajectory and shows how the area could accommodate the targets set out in the London Plan. The capacity analysis in the DCS identifies areas that could accommodate different densities. Suggested density levels that may be appropriate in different locations (see Figure 18) are:

- **Highest** - Old Oak Common Station and surrounds: in the region of 600 units per hectare;
- **High** - Stations and key destinations: in the region of 550 units per hectare;
- **Medium** - Residential led areas: in the region of 405 units per hectare; and
- **Lower** - Sensitive edges: in the region of 300 units per hectare.



2.36. The 2021 Development Capacity Study led to higher figures for individual sites. We believe that this was simply the outcome of OPDC working backwards from a 26,000 total for new homes and having to spread these across identified development sites **regardless of other considerations.**

### **Travel, transport and traffic – more details on the lack of connectivity**

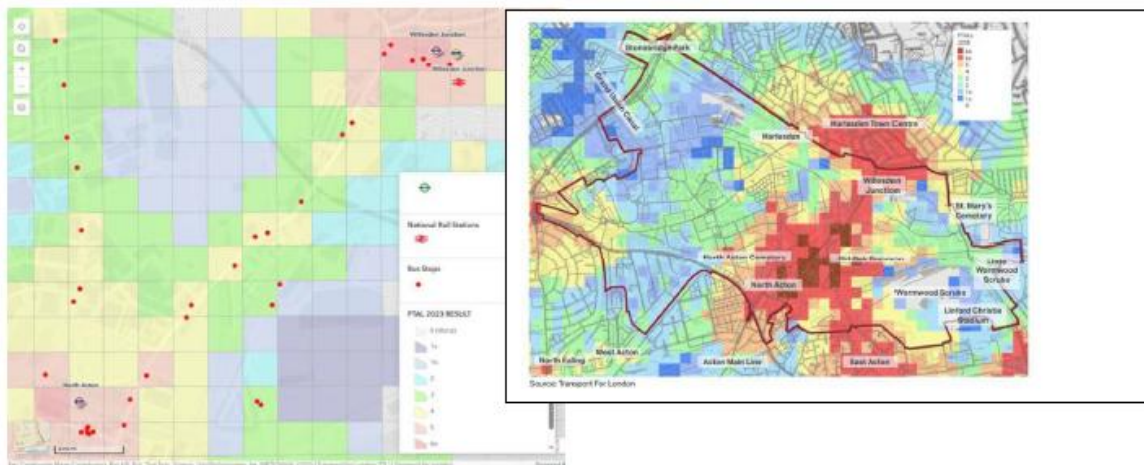
2.37 The ease of travel for existing and incoming residents in the designated Old Oak neighbourhood area remains poor, a legacy of a limited local road network and longish walks to either Willesden Junction or North Acton station. There have been no improvements made to local transport infrastructure, and construction activity has led to multiple road works and temporary traffic lights.

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2.38 The north/south road connections of Old Oak Lane, Victoria Road and Old Oak Common Lane have long been congested. Residents continue to face the threat of a road closure of Old Oak Common Lane for up to four years.

2.39 The Masterplan Framework includes no PTAL map in its 200 pages, a notable omission. The 2022 Local Plan includes maps of ‘current’ and ‘future’ PTAL levels (figures 7.10 and 7.11). These proved contentious at Examination stage, as the ‘future’ map included no forecast date and no information on the assumptions on which this version was based.

2.40 In mid 2025, the GLA published a set of ‘pen portraits’ for each of London’s Opportunity Areas. That for Old Oak and Park Royal included the ‘future’ PTAL map (with its much improved scores) with no explanatory notes and no date. The Forum and OPDC continue to be in dispute over GLA’s use of this map as part of the preparatory material for the new London Plan.



*The left hand image shows current PTAL levels (from TfL’s WebCat model) for the area between Willesden Junction and North Acton station, including the Old Oak project area. The right hand image shows the PTAL map used by the GLA in its 2025 ‘pen portrait’. Unlike other PTAL maps used in this GLA assessment, this not dated. Without information on what transport improvements are assumed (and on what timeline) the Forum views this version as dangerously misleading and as a work of fiction rather than fact. Continuing assertions by HS2 and OPDC that Old Oak is (or will soon be) a ‘well connected place’ are being taken up by developers and estate agents and give a false impression of the character of a part of London that is **unusually poorly connected**. And with no firm or funded plans to change this position in the next 10-15 years prior to the opening of OOC station.*

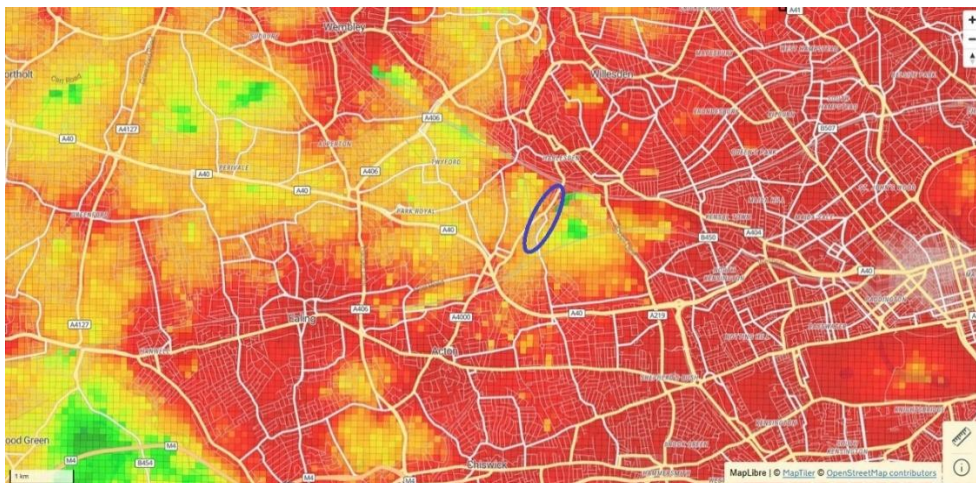
## The new DfT Connectivity Tool

2.41 As noted above, this new [mapping tool](#) has been introduced by DfT to help built environment professionals to understand how sustainably located a place is and the transport interventions needed to support it. Unlike the TfL WebCat system model, the ‘sustainability’ and overall score for locations measures how any location in England

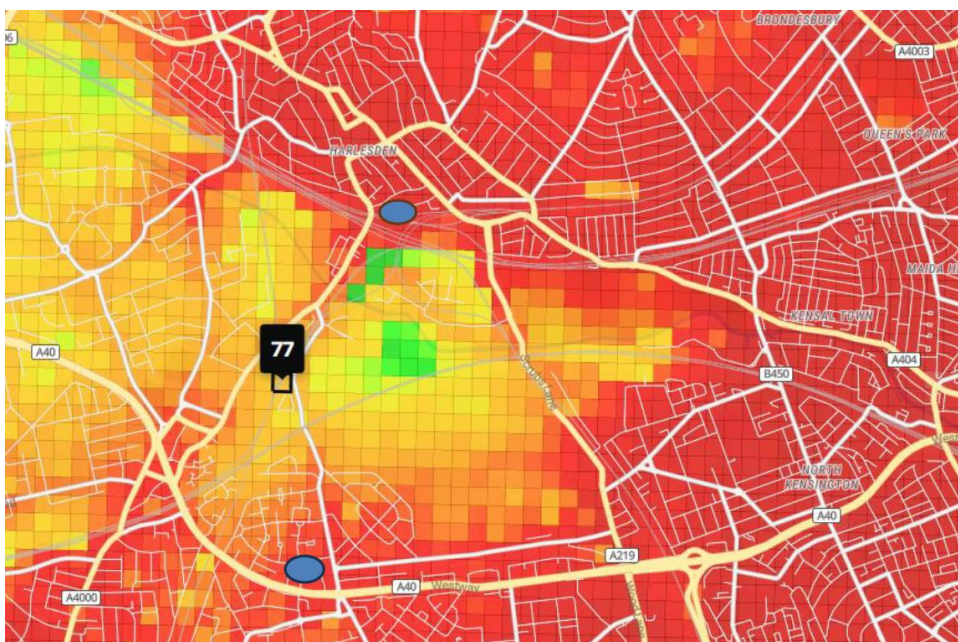
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and Wales is connected to everyday services by walking, driving, cycling and public transport

2.42 The [Connectivity Tool Lite](#) is available for public use. As would be expected most locations in Inner London achieve high scores (the maximum being 100) as shown in red on the London-wide map below. The area in which development sites proposed in this draft neighbourhood plan is outlined in blue.



2.43 This forms part of a noticeable lower connectivity 'isthmus shaped' area projecting towards central London and extending from Park Royal to Kensal Town. The enlarged map below shows the two transport nodes in blue at Willesden Junction and North Acton. The OPDC Masterplan area between is not 'well connected' to local amenities.



## Housing in Multiple Occupation (HMOs)

2.44 Since the start of HS2 construction works, parts of the Old Oak neighbourhood area have seen an increase in the number of HMOs. Predictably a large construction workforce includes many who wish to be housed as near as possible to the OOC station

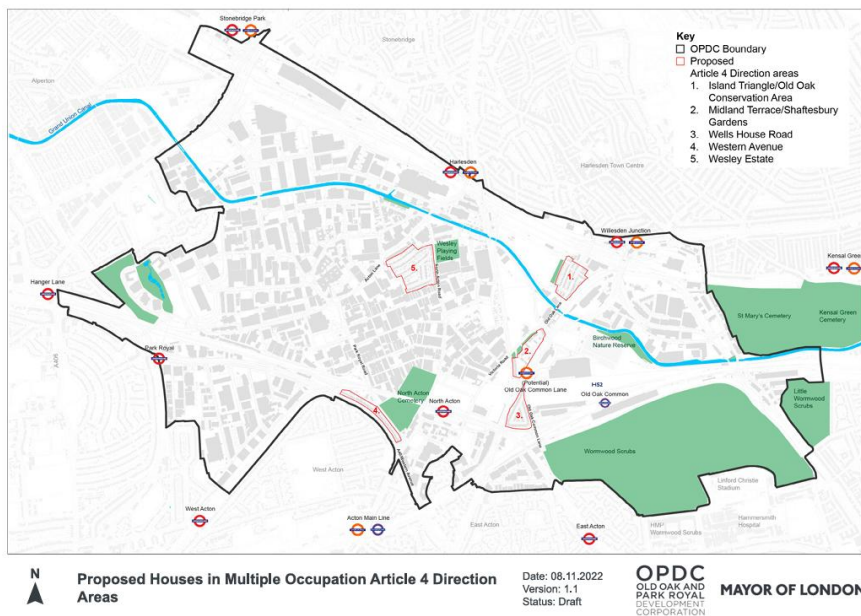
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construction site. Other construction projects in the area (including several data centres) have added to demand for rented accommodation,

2.45 LB Ealing has introduced a series of policies and licensing measures aimed at regulating unlawful use of outbuildings ('beds in sheds') and in mitigating the harmful impact of HMOs on neighbours. The Council introduced mandatory licensing in line with new national legislation in 2018. In 2025 further steps were introduced including:

- Stricter planning controls: Landlords must seek planning permission to convert family homes into HMOs, regardless of the number of occupants.
- Mandatory Licensing extended to all HMOs, including compliance with legally enforceable standards for property management and tenant welfare.
- Impact Assessment: The council aims to balance supply and quality, ensuring that HMOs meet community needs while managing potential issues like noise and waste.
- Increased enforcement measures with dedicated enforcement officers to address complaints related to poorly managed HMOs, including inspections and warnings.

2.46 In 2022/3 OPDC consulted on and implemented an Article 4 Direction removing Permitted Development Rights for small-scale HMOs and requiring planning permission for change of use. The area covered by the Direction includes most parts of the Old Oak neighbourhood area.



Map showing the 5 areas covered by OPDC’s Article 4 Direction requiring planning consent for a change of use to a HMO

**Purpose Built Student Accommodation**

2.47 On Purpose Built Student Accommodation, an over-concentration of PBSA units at North Acton has been the subject of major concern for OONF. We have made

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objections to a series of recent development proposals involving several hundred additional units (applications from Downing and from Imperial College, both consented by OPDC's Planning Committee).

2.48 The Forum's [June 2025 submission to the GLA](#), as part of consultations on *Towards a New London Plan* include an annexe on the balance of student numbers as compared with other residents at North Acton. Our analysis of the figures differs from that used by OPDC. OPDC view a concentration of 31% as acceptable. The Forum considers that North Acton could see as much as a 50/50 split between students and other residents – a transient demographic which will not make for a successful long-term community. Hence proposed neighbourhood plan policy OONA 4.

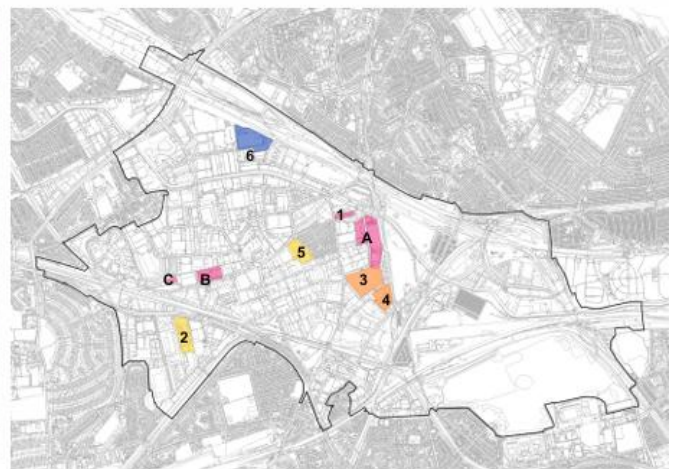
## Data Centres

2.49 The emergence of data centres as one of the few forms of development that has seen significant interest in West London since 2015 has become a growing concern for local people.

2.50. When located in industrial areas, proposals for these buildings usually lead to few objections from the public. There is growing awareness that the operation of data centres makes huge demands on electricity and water supplies. In 2024 Oxford Economics research showed that in west London, the cluster of data centres accounted for 18% of electricity consumption. This led to [intervention by the GLA](#) to work with electricity suppliers to mitigate a scenario in which housing starts were being held up through long delays in achieving an electricity supply. Parts of the Old Oak neighbourhood area are experiencing falls in water pressure.

2.52 This neighbourhood plan includes a policy resisting this type of use within or adjacent to existing residential areas. This reflects the fact that the floor- to-floor heights are far more than ordinary industrial buildings, resulting in excessive building mass in relation to their surroundings.

Site	Status	Floorspace sqm NIA	Jobs	Job density
<b>Purpose built data centres</b>				
1 37-39 North Acton Road Data Centre	Completed	13,739	90	153
2 Concord Road Data Centre	Planning permission	32,720	125	262
3 Bashley Road Data Centre	Near completion	45,014	500	90
4 Chandos Road Data Centre Phases 1A and 2	Near completion	33,872	90	376
5 Frogmore Industrial Estate Data Centre	Planning permission	27,540	50	551
6 Premier Park Data Centre	Live application	25,000	TBC	TBC
<b>Totals</b>		<b>177,885</b>	<b>355</b>	
<b>Retrofitted data centres</b>				
A Equinox Data Centres	Complete - retrofit	25,000 (approx.)	Unknown	Unknown
B Equinox Data Centre LD3	Complete - retrofit	2,600 (approx.)	Unknown	Unknown
C Coronation Road Exodus Data Centre	Complete - retrofit	Unknown	Unknown	Unknown
<b>Total floorspace</b>		<b>205,485</b>		



*Data centres in the OPD area (Source OPDC February 2026)*

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2.50. When located in industrial areas, proposals for these buildings usually lead to few objections. Public awareness of the wider consequences of the operation of data centres has grown slowly, once it became apparent that the huge demands on electricity capacity was prejudicing the start of major housing schemes. In 2024 Oxford Economics research showed that in west London, the cluster of data centres accounted for 18% of electricity consumption. This led to [intervention by the GLA](#) to work with electricity suppliers to mitigate a scenario in which housing starts were being held up through long delays in achieving an electricity supply.

2.51 More recently, the fact that data centres also make heavy demands on water supply has also become more widely known. Parts of the Old Oak neighbourhood area are experiencing falls in water pressure with residents seeking clarification from Thames Water Authority as to the causes.

2.52 This neighbourhood plan includes a policy resisting this type of use within or adjacent to existing residential areas. This reflects the fact that the massing and heights of these buildings can have significant impacts (floor- to-floor heights are far more than ordinary industrial buildings). Noise from plant (generators and extracts) can also be an issue.

## CHAPTER 3 – THE CHARACTERISTICS OF THE FIVE SUB AREAS

3.1 The names ‘Old Oak’ and ‘Old Oak Common’ have become more familiar to Londoners over the past decade – mainly as a result of HS2’s promotional material on the rail interchange. But most Londoners would not be able to explain what part of the city is referred to as ‘Old Oak’.

3.2 Even now there is now some confusion over whether the name ‘Old Oak’ will in future refer to the ‘project area’ in Willesden, East Acton and a section of North Hammersmith. Residents of the Old Oak Estate in LBHF (built in the early 20<sup>th</sup> century) are not happy that the Masterplan identifies a new ‘Old Oak Town Centre’ at a location known to date as Acton Wells and not close to their own homes.

3.3 As of 2026, a significant part of the existing residential population within the eastern part of the OPDC boundary lives within the separate residential enclaves within the Old Oak neighbourhood area. North Acton (to the south of the neighbourhood boundary) has seen a rapid growth in population, estimated now at around 5,000 residents and students living in the core area within and immediately around the Victoria Road gyratory.

3.4 2021 Census data showed 2,561 people living within the Old Oak neighbourhood area boundary.

3.5 This neighbourhood plan seeks to address the character and needs of each sub-area within the designated boundary, in the following short chapters. Brief details of the history and character of each area are given in each case.

3.6 Running from north to south these five sub-areas are

- The Wesley Estate
- The streets of Railway Cottages off Old Oak Lane (often known as the TITRA area or the Island Site)
- Atlas Road junction including the Collective building
- Midland Terrace and Shaftesbury Gardens, off Victoria Road
- The Wells House Road triangle

3.7 The area has long experienced air pollution from traffic. A 2019 piece of research by Navigus gave details of the concentration of nitrogen dioxide (NO<sub>2</sub>) recorded in 2016, with high levels along the main vehicular routes of Old Oak Lane/Victoria Road and Old Oak Common Lane. Dust from HS2 and other construction work has been a major issue for local residents for a decade now, with the prospect of further decade to come.

3.8 The physical character and fabric of each of these residential communities including the nature of the housing stock is specific to each sub-area and is described in the relevant chapter of this neighbourhood plan.

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## Background to the updated overall vision and objectives for this Old Oak Neighbourhood Plan

3.9 The Forum’s vision for the 22 hectares of the Old Oak neighbourhood area has already been updated once from the initial draft version -- to reflect the OPDC’s ‘change of direction’ in 2019 from Old Oak North to the ‘Western Lands’. This revised Draft Plan is a third version and takes account of the 2022 OPDC Local Plan. **While the Forum acknowledges the content of the 2025 Masterplan Framework we do not accept the statement at page at page 9 which reads *All detailed development proposals within the Old Oak area are expected to take account of the vision, principles and guidance set out in the Masterplan Framework.* The 2022 Local Plan (and 2025 Masterplan Framework) remains the statutory policy framework for determining applications, with the 2024 Old Oak West SPD adding ‘policy guidance’.**

3.10 We do accept that OPDC Regeneration Strategy and the 2025 Masterplan Framework provide relevant background information and ‘illustrative’ suggestions on how the Old Oak project area could be developed. But we maintain our view that these non-statutory documents have only limited material weight in decision-making compared with the Local Plan.

3.11 The changes in OPDC’s spatial plans as portrayed in the Masterplan Framework have led to some rethinking of this Draft Neighbourhood Plan as compared with our earlier 2021 Draft. **The changed location proposed for an ‘Old Oak Major Town Centre’ in the Framework has been reflected in this neighbourhood plan.** The 2022 Local Plan Land Use Map at figure 3.7 defines an amorphous and continuous area running southwards from Channel Gate, merging a Major Town Centre into a Major Town Centre/Commercial Centre around OOC station – as shown below:



Extract from Land Use Figure 3.7 from OPDC 2022 Local Plan, showing location of Old Oak Major Town Centre and Major Town Centre/Commercial Centre (hatched area).

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3.13 As commented on in our consultation responses at Regulation 19 and Post Submission Modification stages, the Forum never viewed this as a convincing concept. The proposed town centre was spread across a wide area. Achievement of the concentrated footfall needed to support major town centre uses seemed improbable. The distance from OOC station platforms to ‘major town centre facilities’ at Atlas Road/Channel Gate would have been a kilometre, along a windswept section of Old Oak Common Lane with limited scope for active frontages. Local people questioned during preparation of the Local Plan why HS2/GWR rail Elizabeth Line passengers would wish to make this walk?

3.14 Latest proposals for a major town centre at Acton Wells, as now shown in the Masterplan Framework (see below) will be seen by many as a more coherent spatial proposition. But the cluster of dense and tall buildings shown at this location in the Framework document has harmful impacts for residents in Wells House Road, Midland Terrace and Shaftesbury Gardens.

3.15 This new proposition in the Masterplan also opens up a new potential tension -- as to whether this location could attract investment in ‘town centre uses’ (and customer footfall) in the prolonged gap prior to the opening of OOC station. North Acton already has a retail offer and other facilities (albeit limited and weighted towards a student customer base). It is already a ‘neighbourhood centre’ with better transport connections (in the form of North Acton station). Until a possible new Overground station in Old Oak Common Lane is opened, why will Acton Wells draw in major town centre uses?



*OPDC Masterplan graphic of the ‘Adjacent Site’ to OOC station (left) and the bridge connection to Old Oak Old Town Centre at Acton Wells. Existing buildings at the North Acton Cluster shown in white at the top of the image.*

3.16 Specific proposed policies and proposals for the sub-areas of the Wesley Estate, the Railway Cottages, Midland Terrace/Shaftesbury Gardens, and Wells House Road

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have been reviewed and amended in this latest Draft Plan. These are set out in the subsequent chapters.

### **Ealing’s new Local Plan, OPDC Legacy Framework 2024, and Community-led Regeneration Charter**

3.17 The Old Oak Neighbourhood Forum has tracked the process of the new Local Plan for Ealing, and took part in sessions at the Examination in Public. One of the objectives of this neighbourhood plan is to try to ensure that a future ‘major town centre’ at Old Oak becomes over time a successful and sustainable addition to Ealing’s existing ‘Seven Towns’.

3.18 The Forum has therefore taken into account Ealing’s OPDC Legacy Framework 2024. This a council-approved policy framework that sets out **Ealing’s priorities, expectations, and “asks” for the long-term regeneration of the Old Oak and Park Royal area**. Ealing Council explicitly framed the strategy around long-term legacy, rather than short-term development outputs, and this document is non-statutory and advisory. Nevertheless it is intended to set out expectations of the Borough Council in the next stages of regeneration at Old Oak, with revisions every two years.

3.19 The Forum and its membership will be interested to see Ealing’s response to the initial pre-submission consultation on this draft neighbourhood plan. As a body involving many long-term residents of the Old Oak area, we are always conscious of the fact that OPDC’s plans currently set the rules and delivery framework for regenerating Old Oak, while Ealing Council’s Legacy Strategy sets out what Ealing wants that regeneration to leave behind for its communities.

3.20 Ealing’s recently published [Community-led Regeneration Charter](#) has been prepared with the aim that *developers, investors and communities can work more closely together to deliver positive, meaningful change in our local neighbourhoods*. The Charter was *co-produced with the community and multiple stakeholders during an extensive engagement with local communities over a six-month period from August 2025*.

3.21 One of the Charter’s 15 priorities for good growth and regeneration is *Creating community governance structures to empower residents, such as resident steering groups and voluntary groups. Ensuring shared decision-making, resident-led structures, youth voice, diverse participation and joint working throughout the project lifecycle*.

3.22 Our Forum considers that its decade long efforts to influence the plans and decisions of OPDC has been an example of sustained effort to put this aim into practice. This also applies to the initiative in 2025 from a number of local residents associations and neighbourhood forums to establish the [OPDC Residents Panel](#).

## CHAPTER 4 The overall vision for the Old Oak Neighbourhood Plan

4.1 The Forum's overall 'vision' for the neighbourhood plan, set out in earlier drafts, has been reviewed and updated as follows:

**A) to seek to ensure successful integration of long-established residential enclaves with new development, moderating OPDC development and regeneration proposals which have yet to respond sufficiently to revised plans, timescales and continuing uncertainties on the impact of the HS2 project.**

**B) to achieve early delivery of mid-rise housing on the five development sites within the neighbourhood boundary at residential densities appropriate to locations on the border of inner/outer London and with a high proportion of family homes -- in the context of the local transport infrastructure likely to remain in place until the late 2030s at the earliest.**

**C) to support Ealing Council's 2024 OPDC Legacy Framework by creating is an exemplar sustainable part of London, guided by the principles of a 20-minute neighbourhood and promoting the delivery of new social infrastructure for existing and new residents.**

**D) to make use of the neighbourhood planning framework to instil the principles and objectives behind LB Ealing's [Community led Regeneration Charter](#) in OPDC's engagement with developers.**

**E) to provide development plan underpinning which could facilitate early housing delivery on OPDC land assets, helping to relieve acute housing pressures on this part of West London.**

4.2 These high-level aims are then translated into a set of eight 'objectives', recognising what is potentially achievable through planning policies along with some potential 'actions' included in this neighbourhood plan. Specific draft planning policies are then defined. A first set of NP policies is designed to apply across the neighbourhood area. These are followed by policies tailored to each of the sub-areas covered in each chapter of the Draft Plan.

**Objective 1** *To improve cohesion and integration between the sub-areas within this part of East Acton and with adjoining parts of Ealing, Brent and Hammersmith through improved connections and better access to local amenities within a 'walkable neighbourhood'.*

**Objective 2** *Through site allocations, to establish a viable neighbourhood centre at Atlas Road Junction, to serve the daily needs of surrounding residents.*

**Objective 3** *To enhance the public realm and quality of open spaces, making use of Local Green space designations, especially in these three sub-areas*

- **Wesley Playing Fields**
- **Railway Cottages/TITRA area**
- **Midland Terrace/Shafesbury Gardens**

**Objective 4** *To enable and support early delivery of new homes at densities that can be supported by the existing transport network in the area, working with the OPDC and GLA on innovative approaches to Modern Modular Construction (MMC).*

**Objective 5** *To ensure that new development encourages pedestrian and cycle movement and modal shift to sustainable form of transport, in line with 2022 OPDC Local Plan policies on Transport.*

**Objective 6** *To reduce traffic congestion in the area and mitigate where possible the continued impact of HS2 construction traffic.*

## **DRAFT POLICIES APPLYING TO OONA AREAS 1-5**

4.3 There are eight draft generic policies proposed in this neighbourhood plan, intended to apply to all of the five sub-areas within the neighbourhood boundary.

### **Policy OONA 1 – Housing density**

***Housing densities of new residential development proposed within the neighbourhood area should not exceed net residential densities of 350 units/hectare other than at locations achieving PTAL levels of 4 or above (i.e. near existing public transport nodes).***

***Reasoned justification: this overall density level reflect parameters for ‘urban’ rather than ‘suburban’ locations in the National Design Code and is towards the upper end of those used in the former London Plan Density Matrix. This policy provides for effective use of land and ‘optimisation’ in this 22ha of the Opportunity Area, but not for the ‘superdensities’ that appear to be envisaged at many locations in the OPDC Masterplan Framework. As and when this neighbourhood plan is reviewed, account will be taken of improvements in transport infrastructure that have materialised on the ground.***

### **Policy OONA 2 – Building Heights**

***OONA Area 3 at Atlas Junction is recognised as a location appropriate for tall buildings (i.e. above the OPDC definition of 15 storeys). In other parts of the neighbourhood area new Tall Buildings will be resisted unless of a height and scale, mass and volume that is proportionate to its location and in keeping with the positive character of the local context of its surroundings, including the predominant building heights.***

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*Reasoned justification: to ensure that new development within the neighbourhood area is integrated with the urban grain of the existing residential settlements and to conform with London Plan Policy D9 on Tall Buildings.*

### **Policy OONA 3 – Affordable Housing**

*All residential developments to provide affordable housing at levels consistent with London Plan policies prevailing at the time and OPDC Policy H2 (which applies to those with the capacity to provide more than 10 self-contained units (or have a gross internal residential floorspace of more than 1,000 sqm) subject to viability.*

*Reasoned justification: to reflect affordable housing policies in the London Plan and OPDC 2022 Local Plan with flexibility to take account of the [MHCLG/GLA Housing Support measures introduced in March 2026](#).*

### **Policy OONA 4 – Purpose built student housing**

*In the interest of retaining a balanced community within the neighbourhood and in light of the over-concentration of Purpose Built Student Accommodation at nearby North Acton, to resist proposals for student housing developments and further co-living schemes within the neighbourhood area.*

*Reasoned justification: North Acton, near the OONA, has seen a severe over-concentration of purpose built student housing. This does not achieve a balanced and sustainable community, and where over-concentrated within an area leads to a transient population with insufficient stake in long-term quality of life in the area. The neighbourhood area already includes the Collective co-living scheme of 700 units.*

### **Policy OONA 5 – Houses in Multiple Occupation**

*In those parts of the neighbourhood covered by OPDC’s Article 4 Direction on HMOs applies (areas 1,2,3 and 5) to resist such applications unless clear evidence can be provided (and included in planning conditions) to avoid harms from inadequate room sizes, waste storage, parking provision, noise, overcrowding, or parking stress.*



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*Reasoned justification: the construction workforce required to build the HS2/QE Line interchange has already created unusually high demand for low cost privately rented accommodation. Coupled with extended planning blight preventing house sales this is leading to transfer of existing housing to poor quality HMO accommodation inadequately managed by landlords to the detriment of quality of life for neighbours.*

#### **Policy OONA 6 – Data Centres**

*Applications for data centres within the neighbourhood area, or on proximate sites, will be resisted as inappropriate within residential areas.*

*Reasoned justification: the boundary of the Old Oak neighbourhood area was drawn up by the OPDC and not by the interim neighbourhood forum. It was drawn tightly around existing residential settlements (for the most part). Within the boundary there are no sites which were not de-designated from SIL as part of the 2022 Local Plan. Proposals for data centres within the neighbourhood area are relatively unlikely but are resisted on grounds on adverse environmental impacts on neighbouring residential streets.*

*There are no locational policies on data centres within the 2022 Local Plan. Local Plan Policy EU7D supports data centres ‘where circular economy principles have informed the design and implementation of energy (including heating and cooling), water and waste infrastructure). This NP introduces a specific locational policy.*

#### **Policy OONA 6 – Construction Activity**

*Development proposals should be designed in a way that minimises their impacts on amenity, public health and the environment through dust and emissions, light pollution, noise and vibration during deconstruction and construction. Appropriate mitigation for such impacts will be sought through the use of planning conditions, use of Construction Management Plans or section 106 agreements.*

*Reasoned justification: Existing residential areas within the neighbourhood area have been severely affected by intensive levels of construction activity. Whilst OPDC are the local planning authority for the area, powers to enforce on a wider range of environmental issues remain with the local councils. In general, OPDC cannot enforce on the following*

- *noise and disturbance*
- *air quality matters e.g odour, dust and smoke*

#### **Policy OONA 7 – Enabling Active Travel**

*New development should provide new or improve existing infrastructure and facilities which support and encourage safe active travel to assist cyclists and pedestrians and thereby encourage more cycling and walking*

*Reasoned justification: the existing road network in the OONA is already very congested with no early improvements committed to date', An objective of this neighbourhood plan is to encourage modal shift to cycling and walking.*

#### **Policy OONA 8 – Healthy Air**

*Development should not damage the health of the air by increasing emissions of harmful pollutants and should aim to be at least 'air quality neutral' and not cause or contribute to worsening air quality. On major development this should be demonstrated through an air quality assessment and, if necessary, proposed mitigation measures.*

*Reasoned justification – scope for such NP policy to be discussed with OPDC, given limits on powers*

These eight policies applying across the neighbourhood area are framed so as to assist the achievement of the broader objectives within this neighbourhood plan.

## CHAPTER 5 OONA SUB-AREA 1 THE WESLEY ESTATE

5.1 The estate is an area of 1930s houses built originally as company housing by stationery manufacturer Harold Wesley, with these properties subsequently sold to private owners. There are 230 houses, mainly two storey and semi-detached, laid out in a typical suburban pattern of the period.

5.2 This part of the OONA is isolated from other residential areas by industrial premises in Park Royal and North Acton Road, in Harold Road, Newark Crescent and Wesley Avenue and by the Grand Union Canal to the north. Residents in the estate currently lack easy access to basic facilities (GP surgery, opticians).

5.3 In other respects the estate provides good quality low rise housing with higher space standards than would be built today and remains a popular residential area.



*Wesley Estate showing the 2021 neighbourhood boundary in blue, lying within Park Royal and isolated from other residential areas*

5.4 Wesley Playing Fields are located on North Acton Road. This area is designated by LB Ealing as a small open space and totals 1.59 hectares. This is the largest green space lying within the Old Oak neighbourhood area.

5.5 The history of this green space reflects the history of Park Royal which by the early 1930s, had become one of the most dynamic industrial zones in Greater London. Harold Wesley, whose stationery manufacturing firm was among the area's most respected employers, recognised the need to ensure that his staff were not only well housed but had access to local amenities as part of a long-term community.

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5.6 The donation of land for the Wesley Playing Fields in 1931 is a legacy from this period of enlightened employers. The green space has hosted community sports days, school gatherings, and local fêtes s recorded in local oral history. Local residents have worked with LB Ealing to protect the open character of the Fields while enhancing their use for education, sustainability, and public well-being.

5.7 The space meets all three of the criteria for designation as a Local Green Space, which have remained unchanged in the NPPF since 2012 (now Policy HC2 in the 2025 Draft NPPF at page 74). This neighbourhood plan therefore proposes LGS designation, via Policy OONA 1A below.



### *Wesley Playing Fields*

5.8 The Wesley Estate is not designated as a conservation area. However, it is subject to planning restrictions due to its historical significance and community value. These include OPDC's Article 4 Direction removing permitted development rights for HMOs, from which the estate has suffered harm in recent years from a growing number of applications to convert the suburban-style houses. In December 2023 OPDC introduced an Article 4 Direction with the effect of removing permitted development rights for change of use from 'Use Class C3: dwelling house' to 'Use Class C4: house in multiple occupation'. This change of use now requires an application for planning permission. Proposed NP Policy OONA 5 resists further HMOs in the area covered by OPDC's Article 4 Direction.

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## Frogmore data centre proposals

5.9 As mentioned in the earlier section of this Plan on data centres, OPDC's Planning Committee in July 2022 granted outline planning consent to a data centre (Class B8) of up to 35,000sqm on the small Frogmore industrial estate immediately adjacent to the Wesley Estate.



5.10 At the time, facing many development proposals in the area, local residents did not appreciate the potential scale and impact of this proposal. At Stage 1 the GLA advised that the application did not comply with London Plan policies, including the fact that *the site is not identified as suitable for a tall building as required by Policy D9 of the London Plan. GLA officers will consider this issue of non-compliance at the Mayor's decision-making stage having regard to the public benefits of the scheme and other material considerations.* The GLA Stage 1 report noted *The proposed maximum height for the building is 40 metres.*

5.11 The GLA Stage 2 decision referred the final decision back to OPDC as the local planning authority in August 2022. A final decision notice on this outline application was issued by OPDC on 13 October 2022. This required an application for Reserved Matters to be submitted within 3 years from this date. Such an application was submitted on 9<sup>th</sup> October 2025 and remains under consideration by OPDC as at March 2026.

5.12 A number of objections have been submitted by local residents to the Reserved Matters application. The GLA Stage 1 report noted that *As stated within the Noise Impact Assessment, there is potential for extensive nuisance noise generation and air*

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movements – air intake and extract etc, and therefore potential impact on surrounding schools and residential properties and that further acoustic screening may be required.

5.13 The GLA Stage 1 report also commented *The proposed building heights are significant in local townscape terms and there would be a real impact on existing context. It is not clear in the Design Code or Design and Access Statement how this will be managed.*



Section drawings from the reserved matters application 25/0179/REMOPDC

5.14 In light of this history, the Forum considers that the neighbourhood plan should include a specific policy on views from the Wesley Estate, so that in the event of this particular scheme not being built (or the reserved matters application being refused) there would be greater protection against buildings of excessive mass and height on this site.

**Policy OONA 1A -To designate as Local Green Space the Wesley Playing Fields**

*Reasoned justification – While this area is designated by LB Ealing as a small open space, designation as Local Green Space under the NPPF will provide greater planning protection for a longstanding amenity space that is valued by local residents*

**Policy OONA 1B – To resist proposals of significant mass and height at the Frogmore Industrial Estate, which is not a location identified as suitable for Tall Buildings and which lies immediately adjacent to the residential streets of the Wesley Estate**

*Reasoned justification – to protect the existing residential context of the Wesley Estate from inappropriate development, on a site which is not identified in the Local Plan as suitable for Tall Buildings and where such development would be contrary to London Plan Policy D9 Part B.*

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## CHAPTER 6 OONA SUB-AREA 2 THE RAILWAY COTTAGES/TITRA AREA

6.1 This sub-area on Old Oak Lane and south of Willesden Junction is known locally as the 'Railway Cottages' or 'The Island Triangle' or TITRA (from the Island Triangle Residents Association). The streets include around 200 late Victorian workers cottages, built in 1889 by the London and North Western Railway for its employees. Stephenson and Goodhall Streets run north south parallel to Old Oak Lane, on the western side. On the eastern side two mews streets run east west.

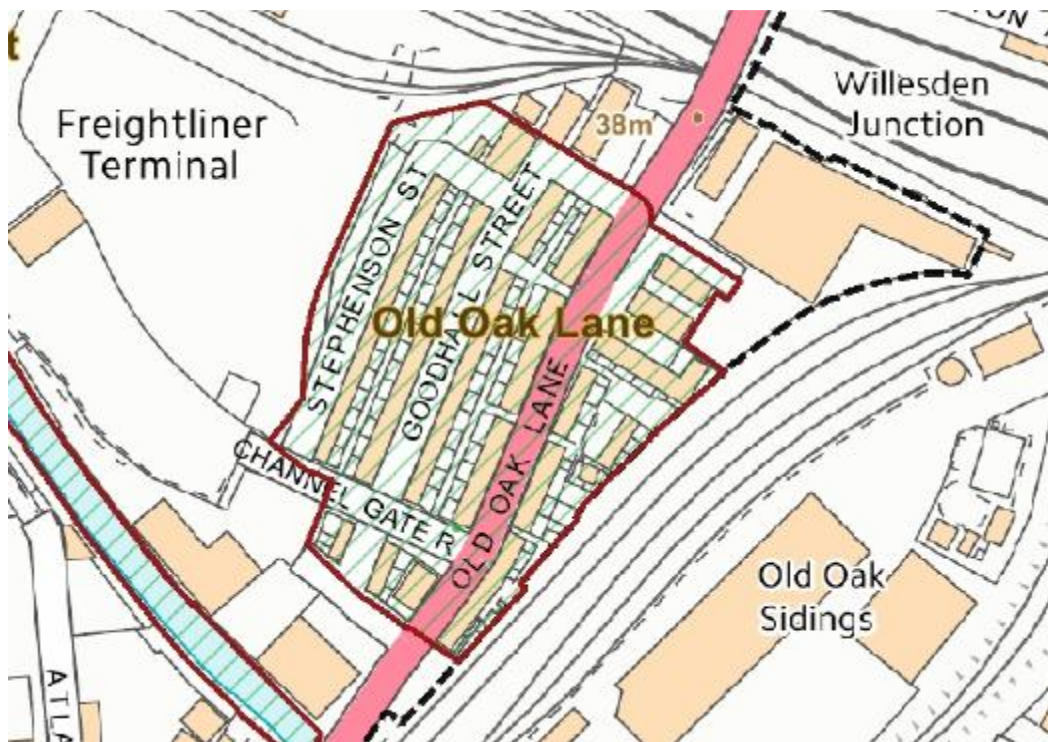
6.2 The housing was laid out as 'through terraces' with regular street fronts contrasting with narrower and more informal back alleys. A railway institute and mission church and school were also originally provided. These streets make up what is now a rare surviving example in London of late 19<sup>th</sup> century planned workers housing.



*Railway Cottages/TITRA sub area with 2021 neighbourhood boundary shown in blue*

6.3 The area was designated by LB Ealing as the Old Oak Conservation Area in 1982 and extended in 1990 and 1994. A Character Appraisal and a Management Plan were published in 2007, with input from the Island Triangle Residents Association (TITRA) and Ealing Civic Society. As stated in the Conservation Area Appraisal (paragraph 26) *The character of the CA is largely if not wholly reliant on maintaining the outward appearance of the estate as little unaltered as possible.* The Conservation Area boundary is shown below.

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*Old Oak Lane Conservation Area boundary shown by brown line*

6.4 This community at Old Oak Lane has a strong identity, with many residents having chosen to move into the streets because of their historic and unusual character. As there are remaining examples of terraced workers housing, the area has long been used for filming. In 2021, the Island Triangle Resident's Association (TITRA) created the first annual [free film festival](#) for local residents to celebrate a long history and continuing history of British television and filmmaking in these streets, with funding from OPDC Heritage grant for small projects.

#### **Current planning policy context**

6.5 This is the only conservation area within the Old Oak neighbourhood area. Despite the presumption in CAs in favour of retaining building and structures (and strong objections for local residents, OONF, and a ward councillor) Ealing Council's Planning Committee on 20 May 2020 granted planning consent to a nine storey housing development at the northern end of Goodhall Street, just outside the CA boundary.

6.6 This application had been delegated by OPDC to LBE under the Scheme of Delegation entered into between the two planning authorities at the first meeting of the OPDC in April 2015. Under this scheme, decisions on more major applications (and all schemes at North Acton) were delegated. The terms of the scheme have since been revised.

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6.7 The site involved lay on the CA boundary and at that time remained designated as SIL. This and the adjoining small group of industrial units were de-designated from SIL via adoption of the 2022 OPDC Local Plan. This development has impacted significantly on the character of the area, harming its previous unusually rare and homogenous Victorian character.



6.8 Proposals for other smaller scale residential developments in the TITRA/Railway Cottage sub-area have since been floated but none have progressed to implementation. Proposed policy OONA 2A is to designate the whole sub-area as a Local Area of Special Character (LASC).<sup>12</sup>

6.9. In the adopted Local Plan, these streets form part of *Place P8 Old Oak Lane and Old Oak Common Lane*. Local Plan paragraph 4.143 notes *The OPDC heritage themes seek to ensure new development reflects the existing and evolving local character in terms of their design, use and operation*.

6.10 The area has a well-established strip of community garden, known as the Woodland Garden, at the rear of the houses on Stephenson Street. Maintenance is organised by the TITRA residents association. Paragraph 4.141 of the Local Plan refers to this as one of several potential examples where small open spaces can contribute to the 30% open space requirements set out in Policy SP8. This neighbourhood plan proposes Local Green Space designation for this land, via Policy OONA 2B.

## 2020 Local Plan Policy

6.11 The ‘vision’ for Local Plan policy P8 states that *this part of the OPDC area will be a place that mediates between comprehensive mixed use redevelopment and industrial intensification*. The Forum and this neighbourhood plan support this vision and prior to the 2019 OPDC ‘change of direction’ argued for a ‘mixed use buffer zone’ between intensive housing development at Old Oak North and the industrial nature of Park Royal Both the Local Plan and the Old Oak West SPD propose a new ‘Channel Gate Street Road’ as shown in Local Plan diagram Figure 4.27 below

<sup>12</sup> LASCs are local form of heritage area designation based on the architectural and/or historic interest of an area. They complement national designations like conservation areas, which have a higher threshold for designation.

Figure 4.32: Channel Gate Place

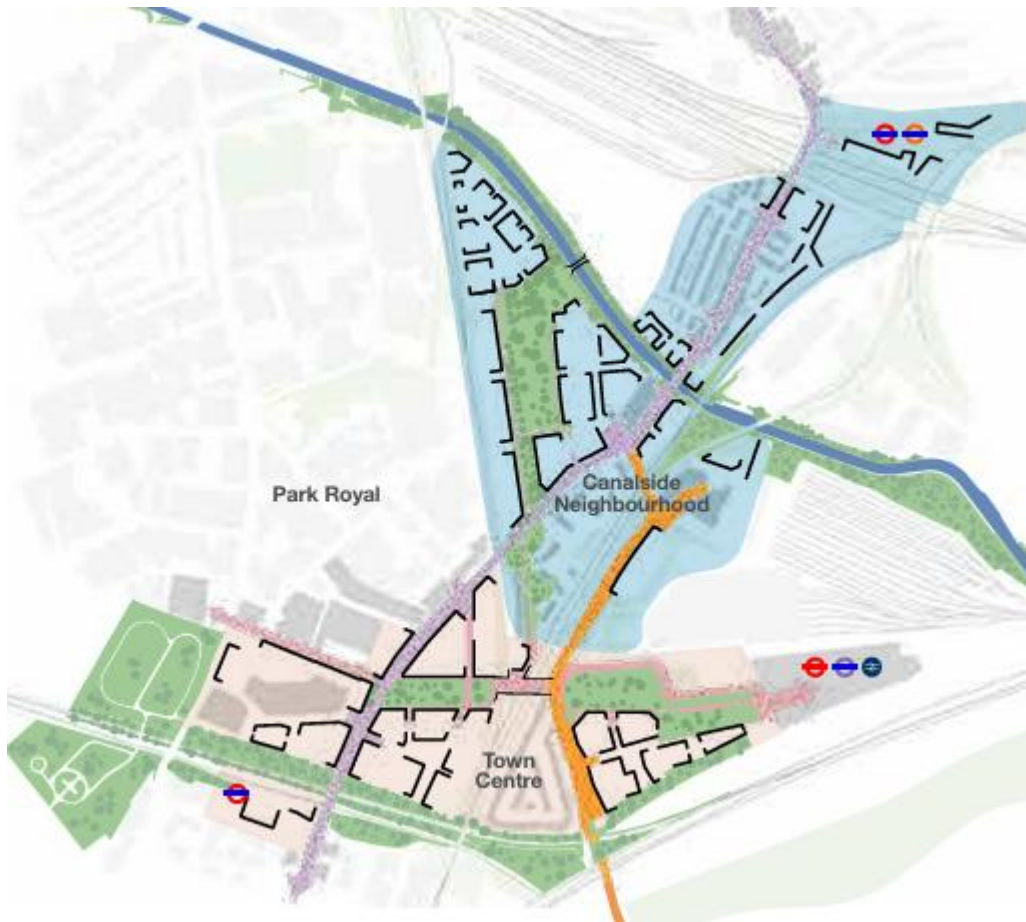


6.12 The north-eastern part of the Atlas Road/Channel Gate (the Willesden Freight Depot) was always destined to be last of the four DfT/HS2 construction compounds to be released for development. This is because of its role in storing materials and tunnel segments, conveyed via a service tunnel to the OOC station site. This role is due to be continued during the construction of the OOC to Euston tunnel and potentially the construction of a Euston terminus also. For several years, HS2 advised our Forum of a 2032 date for release of the site, but the potential overall period for use of the rail head and freight depot now extends into the 2040s.

### The Masterplan Framework and the ‘Canalside Neighbourhood’

6.13 The 2025 Framework document introduces a new concept of **One place, two neighbourhoods** at Chapter 4.6, with the two areas rebadged and given new names (for the third time since the 2018 Submission Version of the Draft Local Plan). These two areas are described as *a canalside neighbourhood* and *a major urban centre*. The Masterplan Framework document makes no acknowledgement that this is different spatial plan to that in the Local Plan.

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*'One Place two neighbourhoods' diagram from 2025 OPDC Masterplan Framework*



*Image from Masterplan Framework looking north along Goodhall Street*

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6.14 The former SIL sites at the northern end of Goodhall Street (now de-designated) are proposed for mixed use redevelopment in the Local Plan. This neighbourhood plan supports this use but seeks new housing that integrates better with the existing housing than the example of 80 Goodhall Street. Hence Draft Policy OONA 2A below.

6.15 The Masterplan Framework suggests (at 6 in the image above) that development *should sensitively form thresholds at both ends of the conservation area with pairs of mid-rise buildings to create points of arrival and transition along the Mile*. Again no definition is given of ‘mid-rise’ heights. Hence Draft Policy OONA 2F below.



Numbering relates to text at page 149 of Masterplan Framework document.

This illustration includes tall buildings (shown as 2) at the eastern tip of the Ursula Lapp site and also on the northern side of the rail lines at Willesden Junction. Neither of these locations are identified as suitable for tall buildings in the 2022 OPDC Local Plan and this neighbourhood plan should not be read as endorsing these proposals. They are contrary to Policy D9 in the London Plan.

## Masterplan proposals for an ‘Old Oak Mile’

6.16 Local residents in this Railway Cottages/TITRA sub area are puzzled by (and seek clarity on) the introduction in the Masterplan Framework of a new concept – the ‘Old Oak Mile’. The northern section (the existing Old Oak Lane) is described as follows (page 141): *The Mile will be the primary urban spine of the Neighbourhood Centre, bringing together varied uses within a clear and legible townscape. Its built form should establish a strong sense of place by:*

1. *choreographing a sequence of markers and corners to define the Mile and create key moments of arrival.*
2. *setting a consistent low-rise shoulder to give clarity to the street and purpose to taller elements.*

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6.17 Page 149 of the Framework sets out an intention *to repair the severance created by Old Oak Lane, which dissects the conservation area, through coordinated development on both sides that strengthens the relationship with the railway cottages and reinforces a local loop connecting the neighbourhood.* This ‘loop’ is shown in the diagram above.

6.18 This diagram (at page 149 of the Framework) seems inconsistent with others showing this section of the ‘Mile’, running through the TITRA sub-area. That on page 142 shows large-scale buildings on both sides of this section of Old Oak Lane, replacing the existing terraced housing of the Conservation Area. The map and Schedule in the OPDC CPO Order include a handful of these houses near Atlas Junction, but not further north towards the canal. Local residents are understandably confused. The jargon used in the Framework document does not help.<sup>13</sup>

6.19 The Masterplan Framework suggests (in respect of point 6 in the image above) that new development *should sensitively form thresholds at both ends of the conservation area with pairs of mid-rise buildings to create points of arrival and transition along the Mile.* Again no definition is given of ‘mid-rise’ heights and local people are unimpressed by the suggested need for ‘*points of arrival and transition*’. Hence Draft Policy OONA Policy 2F below.

## **The Lords site**

6.20 The area on the north side of the canal at Channel Gate (known as the Lords site) is one of those development sites now acquired/controlled by OPDC that lies within the boundary of the designated Old Oak neighbourhood area.

6.21 The Masterplan Framework suggests (at 6 in the image above) that development *should sensitively form thresholds at both ends of the conservation area with pairs of mid-rise buildings to create points of arrival and transition along the Mile.* Again no definition is given of ‘mid-rise’ heights. Hence proposed Policy OONA 2F below.

6.22 In relation to the Lords site itself, this neighbourhood plan proposes a site allocation and policy parameters in Policy 2D below. The slide pasted overleaf gives more background.

6.23 The OPDC Indicative Housing Requirement gives a figure of a minimum of 158 new homes on ‘part of the site’ and the Forum awaits confirmation of the plot boundary. Draft OONA Policy 2D sets a maximum net residential density of 350 units/hectare with heights at a maximum of 8 storeys or 23m.

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<sup>13</sup> The language and vocabulary of the Masterplan Framework document employs terms which are widely used by planning consultants acting for developers in attempts to justify high rise and high density buildings. These include frequent references to buildings as ‘markers’, enhancing ‘wayfinding’, and ‘moments of arrival’. This should not be the language coming from a local planning authority, which needs to justify tall building locations on sounder and objective criteria in accordance with London Plan Policy D9.

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## The Lords site

Proposals from Gempoint consulted on in 2022. Site bought for £2.3m by Gempoint 2000 (a company linked to Lords).

Plans modified to reduce housing units from 450 to 360 and heights from 26 storeys to 16. No planning application was submitted.

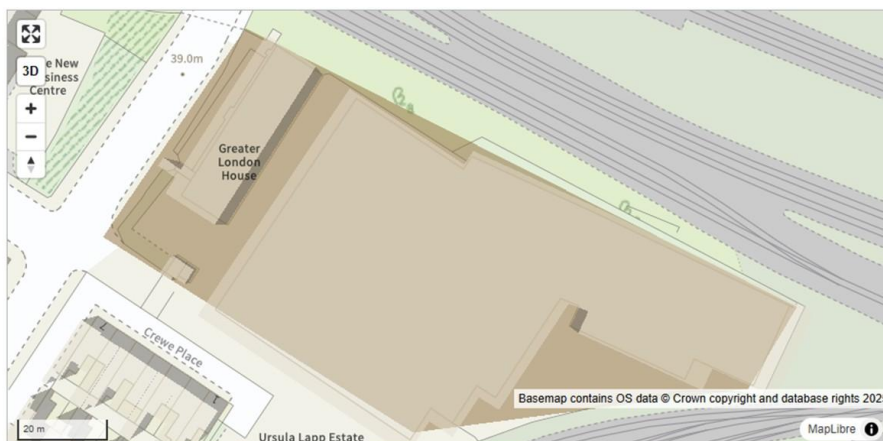
OPDC took control of Old Oak Wharf Holdings Ltd in February 2024.

*Slide discussed at the OONF and GUA meeting in October 2025. The Masterplan Framework images suggest building heights by the canal that might be lower than the 16 storeys proposed by Gempoint. The Masterplan refers to four-storey shoulder heights facing the conservation area and an illustration at page 153 shows 8 storey blocks along the canalside.*

## The Ursula Lapp site

6.24 This major development site also lies within the neighbourhood area boundary.

### Ursula Lapp Estate, Old Oak Lane



Land Registry title shows OPDC having acquired the site in April 2024 for £20,075,000.

*Slide discussed at the OONF and GUA meeting in October 2025. This site lies on the Ealing side of the Borough boundary and was not designated as SIL prior to the 2022 OPDC Local Plan. Hence it has long been high value land in commercial use. It is not the subject of a site allocation in the Local Plan but is referred to in the 2021 Development Capacity Study. It lies within the Channel Gate Place and Cluster Vision.*

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6.25 Online [market information](#) suggests the site value has fallen by £1.284m since its acquisition by OPDC in 2024.

6.26 The OPDC Housing Requirement capacity figure for this site is for a minimum of 250 homes. The site is 0.8ha in size and this would lead to a gross residential density of 333 units/hectare. We consider that this equates to a net residential density of around 500 units/hectare. Most of the site has a PTAL score of 3 with the part fronting onto Old Oak Lane achieving PTAL 4.

6.27 Given these middling levels of access to public transport, we consider a level of 500 units/hectare to be excessive. This would be well above the 405 level in the former London Plan Density Matrix for the most 'central' urban sites with best possible levels of access to a Tube/Overground/rail station. **Hence Policy OONA 2E resists development at net residential development levels above 400 dwellings/hectare on this site.**

6.28 The illustration above for 'Lane Quarter' at page 149 of the Masterplan Framework includes a note at 2) saying '*locate taller massing along the railway edge, with the tallest element positioned furthest away to relate to future development at Willesden Junction while minimising impact on conservation area character*'.

6.29 This image below from the Masterplan shows in the foreground a very sizable and tall building at the eastern tip of the Ursula Lapp estate (confusingly this image and a number of others in the document are shown with south rather than north at the top of the page i.e upside down from normal maps). **The location shown with a tower building in the Masterplan Framework is not identified as a suitable location in the 2022 Local Plan and such a development would be contrary to London Plan Policy D9 Part B.**



*Section of image of Canalside Neighbourhood from page 150 of Masterplan Framework. Suggested tower building is a lower left of image. No information on building height or housing density given in this document which is not part of the statutory development plan.*

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## Proposed neighbourhood plan policies for OONA Area 2 (Railway Cottages/TITRA).

6.30 The sites and other areas referred to in these proposed policies are all shown on the map of the sub-area, as below:



**OONA POLICY 2A – to designate the land to the north of Goodhall Street and east of Old Oak Lane as a ‘Local Area of Special Character’ (LASC) within which new development which fails to respect the character and heritage of the Old Oak Conservation Area will be resisted.**

*Reasoned justification: the land north of Goodhall Street has been in industrial/commercial use and was de-designated from SIL via the 2023 OPDC Local Plan. Remaining areas proposed for LASC designation are already within the CA boundary. New mixed use development on these sites will be bordering directly*

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on a Conservation Area and needs to take account of OPDC Local Plan Policy D7 on Heritage. D7(b) states ‘OPDC will give great weight to the conservation and enhancement of the significance of designated heritage assets, including their settings’.

**OONA Policy 2B – to designate as Local Green Space the Stephenson Street Community Garden known locally as the Woodland Garden**

*This community garden, maintained by The Island Site Residents Association, is long established and recognised at Paragraph 4.141 of the Local Plan refers to this as one of several potential examples where small open spaces can contribute to the 30% open space requirements set out in Policy SP8.*

**OONA Policy 2C - to allocate the OPDC owned site at Goodhall Street, as shown on the map above, for mixed use with housing at a maximum net residential density of 350 units/hectare, providing workshop space at ground floor level and retaining existing commercial uses of demonstrable benefit to the local community. Maximum height of 8 storeys or 20.5m.**

*Reasoned justification: this site was designated from SIL in 2024 and has well-established commercial uses valued by local people. The Old Oak Neighbourhood Forum supports Local Plan policy of introducing mixed use and providing additional housing, provided that this is balanced with continuing to provide local employment and retaining local services of high value to the community such as garages and vehicle repairs. The site has a PTAL level of 5 and is adjacent to a Conservation Area. The Housing Requirement figures assume 42 new homes but this is for part of the site only. Policy OONA 2C sets a maximum net residential density of 350 units above E1 commercial space and a 8 storey height limit (23m)*

**OONA Policy 2D – to allocate the OPDC owned site known as Lords Building Merchants on Old Oak Lane, as shown with a brown boundary on the map above, primarily for housing use with social and community uses at ground floor level and E1 use on Old Oak Lane and Goodhall Street frontages at a maximum net residential density level of 350 units/hectare and with building heights limited to 8 storeys or 23m.**

*Reasoned justification: this policy reflects Principle P9 Place and Cluster Vision in the Old Oak West SPD and Site Allocation 26 Channel Gate in the 2022 OPDC Local Plan. This latter site allocation is for 3,100 new homes over the 20 year plan period 2018 to 2038. The 350 units/hectare proposed maximum reflects the site’s current PTAL level of 3 with a small section of 4 on Goodhall Street/Old Oak Lane and will be reviewed in successive versions of this neighbourhood plan if new transport infrastructure comes onstream. OPDC Local Plan Policy T4B requires car-free development for residential developments located in existing or planned areas with PTAL between 4 and 6B. Hence this site is not suitable for car-free high-rise housing.*

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**OONA Policy 2E – to allocate the OPDC owned site at the Ursula Lapp Estate, Old Oak Lane primarily for housing use, with social and community uses at ground floor level and E1 use on Old Oak Lane at a maximum residential density of 400 units/hectare and with provision for Tall Buildings on those parts of the site adjoining rail lines and furthest from the Old Oak Conservation Area boundary.**

*This is a new site allocation following acquisition of the site by OPDC in 2024. The 400 units/hectare reflects the sites current PTAL levels of 3-4 and will be reviewed in successive versions of this neighbourhood plan if new transport infrastructure comes onstream. The site has some locations suitable for tall buildings subject to design that minimises harmful impacts on the Conservation Area.*

**OONA Policy 2F – To resist the introduction of large-scale and/or tall buildings on both sides of Old Oak Lane within or adjacent to the Conservation Area boundary unless these are justified with reference to Place Policies within the 2022 adopted OPDC Local Plan.**

*Reasoned justification: The 2025 Masterplan Framework shows images and introduces proposals on sites in this neighbourhood sub-area which depart from/are contrary to the content of the 2022 OPDC Local Plan. This policy reflects the fact that the Framework is not a development plan document.*

## CHAPTER 7 OONA SUB-AREA 3 – ATLAS ROAD JUNCTION

7.1 The concept of the Atlas Road junction as a new ‘neighbourhood hub’ was one suggested by members of OONF in the first round of OPDC consultations on the Regulation 18 version of the OPDC Local Plan. This took place in early 2016. The Forum welcomed the fact that this idea was carried through into the Regulation 19.2 version. The existing residential enclaves within the neighbourhood boundary have long lacked access to enough basic amenities in terms of convenience shops, a pharmacy, a post office, or choice of cafes and restaurants.

7.2 The opening of the Collective building in 2017 brought to the Atlas Road junction a new community, living in a co-ownership housing scheme of 700 privately rented studios. As part of the building a smallish supermarket opened, and the Collective’s café/restaurant provided a valued addition to the area. This has since closed and re-opened over time, with the original owners of the Collective going into administration during Covid lockdown (when the communal spaces in the building could be used).

7.3 The Oaklands Rise development (605 flats with some managed by Notting Hill Genesis and other private) brought new prospects of activated ground floors and new facilities. These parts of the building have remained vacant since the development opened in 2022.

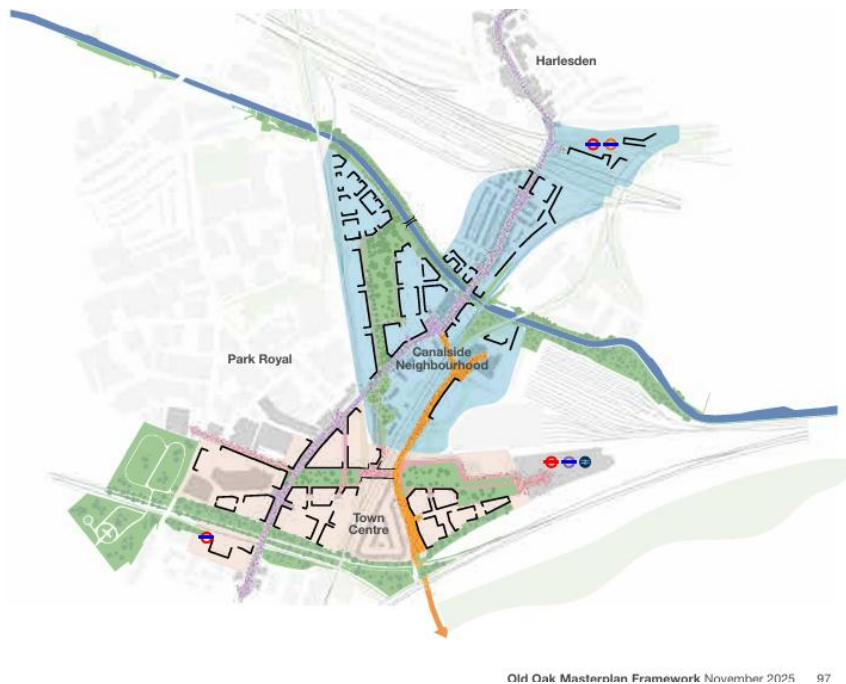
7.4 The potential future of this part of the Old Oak neighbourhood area is now very different from when the boundary was drawn up and designated by OPDC in 2017. This area subsequently was covered by the 2024 Old Oak West SPD. As ‘policy guidance’ this document attempted (through a set of ‘principles’) to retrofit greater spatial coherence to an area previously defined as parts of four separate ‘Places’ in the 2022 Local Plan.

7.5. The more recent 2025 OPDC Masterplan Framework) shows OONA sub-area 3 as the southern part of the proposed ‘Canalside Neighbourhood’ in OPDC’s latest *One Town – two neighbourhoods* concept. Unsurprisingly those living in the area have found it hard to keep up with these changes in the spatial plans for Old Oak, particularly with the introduction of new names or titles for existing streets and locations (*‘Old Oak Mile’*, *‘The Common Cut’* and the *‘Old Oak Line’*). It is not clear what purpose these titles serve.

7.6 Aside from confusing name changes and queries on plans for the northern part of the ‘Old Oak Mile’ (addressed under sub-area 3) this neighbourhood plan supports the Masterplan proposition of ‘Atlas Village’ as a *neighbourhood centre, with a wide range of public uses, forming the thriving community-focused heart of the Canalside Neighbourhood* (page 140 of Framework). This takes proposals back to what local residents were arguing for in 2016. The Forum was unconvinced by the 2019-22 PSMDLP Modifications which defined Atlas Junction as part of a ‘major town centre’ at Channel Gate.

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7.7 What has changed radically in the past decade is the timeline for the release of the DfT/Hs2 construction compounds at Atlas Road/Channel Gate. It has never been clear why HS2 in 2022 carried out detailed feasibility work on the potential commercial value of these sites<sup>14</sup>, as if it would be this Government agency that would carry out development itself. We assume that at this stage in 2022 the inter-agency negotiations on the OPDC Outline Business case had yet to establish a lead delivery role for the Mayoral Development Corporation.



The newly defined 'Canalside Neighbourhood' in the OPDC 2025 Masterplan Framework

Old Oak Masterplan Framework November 2025 97

7.8 Until the outcome of the HS2 'reset' is known, it is not clear how far DfT will seek to recoup the added land values on the HS2 construction sites since their original acquisition and clearance pre-2015. Future use of these landholdings as sites developed by OPDC and JV partners must presumably involve their transfer to OPDC at current market values, with DfT keen to maximise these in order to offset the escalating budget for the overall HS2 project.

7.9. Back in August 2022, before agreement on future roles via the OPDC Outline Business Case, the HS2 Commercial Division had their own ideas of what should be developed on the Atlas Road/Channel Gate construction compound – at that time envisaged to be released in Q2 2032, which is later than the other three sites as it is a key part of the delivery of the HS2 Euston station.<sup>15</sup>

<sup>14</sup> OONF obtained a copy of slides prepared by the HS2 Commercial Division

<sup>15</sup> Slide from HS2 presentation to Andy Slaughter, MP for Hammersmith in August 2022 coupled with information in HS2 FoI response to OONF in 2023.

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## Atlas Road – canal-side living and prime commercial space

An opportunity to create anew residential and commercial zone with canal links

- 2,042 residential units  
16,978 sq m of commercial
- 1.7 ha (4.2 acre) public park
- Improved connectivity to the Grand Union canal



View North-West

www.hs2.org.uk

Slide from August 2022 set prepared by HS2 Commercial Division.

7.10 At the OPDC Board on November 20<sup>th</sup> 2025 HS2's Huw Edwards gave a brief update including the fact that that he had been tasked by HS2 Chief Executive Mark Wild to report by Xmas on the development potential of 20 HS2 sites between the West Midlands and OOC station. The Forum is pursuing whether these include the four construction compounds in the OPDC area. Our understanding of the OPDC Outline Business case is that it will be OPDC that realises the development potential of these sites in the first instance, with returns passed on to DfT over time.

### Neighbourhood plan proposals for development sites at Atlas Junction

7.11 Given the restricted boundary of the neighbourhood area fixed by OPDC in 2017 (and marginally revised in 2021) the Draft Plan is able to make specific proposals in relation to one site only.



*View of Atlas Road Junction sub-area, showing Shaftesbury Gardens, the Collective building and Oaklands Rise (bottom right) with the Atlas Road HS2 compound in the background.*

### Victoria Terrace

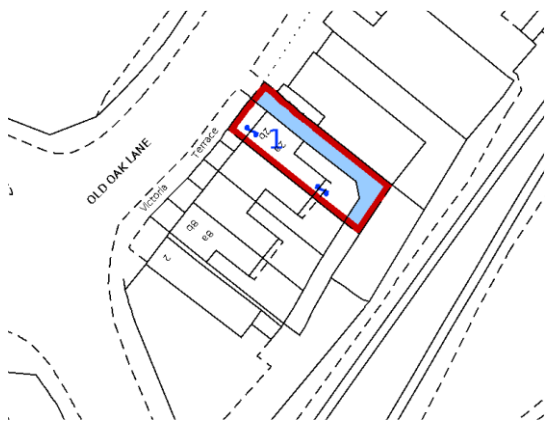
7.12 This is the one development site within the Old Oak neighbourhood boundary at the Atlas Junction sub-area. The site was the subject of development interest back in

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2019, when detailed proposals for a 15 storey building were consulted on, and resisted by residents as being out of scale with Victoria Terrace's existing two storey cottages.

7.13 This proposal (see overleaf) reached the stages of assessment by the OPDC Community Review Group but was not subsequently progressed by the developers. The consultation material had stated *The site will also be a short walk from Old Oak Common Station which is anticipated to open in 2026.*

7.14 The existing Old Oak Café on Old Oak Lane (which remains in operation) forms part of the development site. An OPDC report of December 2024, granting retrospective permission report to a rear extension of this property, notes that OPDC was by that time the owner of the freehold. The circumstances of this site acquisition are not known. More recently, OPDC show the property at 2A Old Oak Lane as having been acquired, as a separate small site. This may be related to providing vehicle access to the development site shown overleaf.



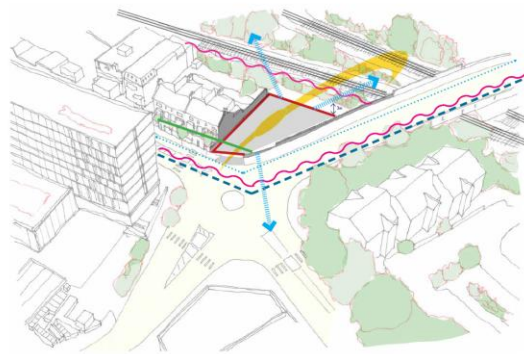
*Site of 2A Old Oak Lane, shown by OPDC as an acquired site (not confirmed by Land Registry records which may not be up to date).*



*2019 development proposal for Victoria Terrace*

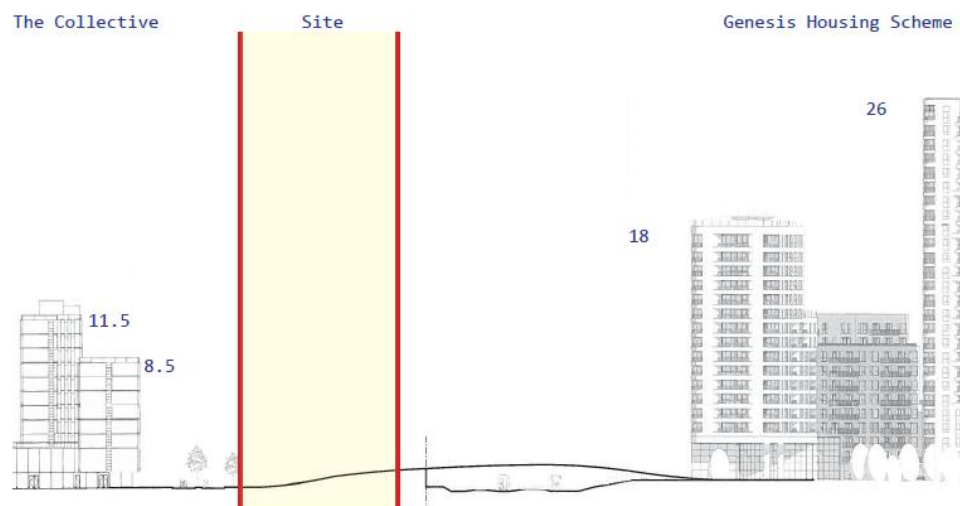
Victoria Terrace, Old Oak Lane CGI of scheme

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Victoria Terrace development site as consulted on in 2019

7.15 The Old Oak Neighbourhood Forum's earlier draft plans (2018 and 2021) recognised that this development site is suitable for a development of some scale. The site lies between the Collective building at 8-11 storeys and Oaklands Rise at 18-26 storeys.



7.16 Tall buildings within the OPDC area are defined as those above 15 storeys or 48 metres above ground (Local Plan Policy D4). This site falls within one of the several (imprecisely delineated) areas defined as appropriate for Tall Buildings on the map at 3.15 of the 2022 Local Plan.

7.17 Local Plan Policy P8C1: Atlas Junction Cluster includes the text below

*g) contributing to a variety of building heights including:*

*i) on the eastern side of Old Oak Lane, building heights should be taller close to the canal, comparable to the existing height of The Collective, and should decrease in height to respond appropriately to the existing Victoria Terrace;*

*ii) on Oaklands North, generally 6 to 8 storeys facing on to the Grand Union Canal, with generally 10 storeys along Union Way; and iii) on the western corner of Atlas Junction, heights of generally 8 to 10 storeys.*

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7.18 In terms of appropriate housing density for the site, its 2026 PTAL score is currently 4 (rather than 3 as applies to development sites to the north and south within the neighbourhood boundary).

7.19 Taking this context into account this neighbourhood plan proposes Draft Policy OONA 3A below. This neighbourhood plan also proposes some 'Actions' for this important sub area. These are consistent with the Masterplan Framework proposals.

### **Masterplan Framework Proposals**

7.20 While supporting the concept of a neighbourhood centre at Atlas Junction, we do not as yet understand the intended scope of these two paragraphs below at page 150 of the Framework document.

- *lining available frontages of the Old Oak Mile, entrances to Channel Gate Park and routes to and along the Grand Union Canal with a variety of commercial units to complement social infrastructure anchors.*
- *maximising a high street parade and high-quality public realm from Atlas Junction to the Old Oak Lane bridge over the canal as the only section of the Mile in the Neighbourhood Centre where activation on both sides of the street is achievable.*

7.21 Since the introduction of the concept of the Old Oak Mile, in the OPDC Spatial Principles exercise, local residents have been sceptical about the idea of a 'mile long high street'. It is not clear how this could ever sustain the footfall to attract 'high street' uses. As recognised in the Masterplan, there are sections of this Mile where commercial or retail activation is unachievable.

7.22 The images at page 140 of the Framework document show very large buildings at the 'entrance to Channel Gate' and on the eastern side of Old Oak Lane between Atlas Junction and the canal. The 2022 Local Plan at 4.147 states *The Willesden Junction Maintenance Depot, the adjacent Power House and the sites on the east and west of Atlas Junction represent an opportunity to coordinate and optimise development to help establish this part of the major town centre.*



Key corner signalling the entrance to Channel Gate Park from the Mile



An essential two-sided high street parade between Atlas Junction and the canal

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7.23 We do not see policy justification in the 2022 Local Plan for the demolition of existing houses along this stretch of Old Oak Lane, or anything that supports a requirement for extended ‘activation’ of the full stretch of the eastern side of the street from Atlas Junction to the canal. This location is no longer designated as part of the Old Oak major town centre, as is referred to at 4.147 of the Local Plan. The demolition of some of these houses is not justified by the content of the 2022 Local Plan.



7.24 Draft policies for this sub-area of the designated neighbourhood are set out below:

**Policy OONA 3A – To allocate the site at Victoria Terrace for a mixed use development, primarily housing along with E1 commercial uses at ground floor (and scope for social/health/community uses above). With a maximum net residential density of 350 units/hectare and a maximum height of 30m including any podium deck.**

**Reasoned justification: a 30m height limit is at the level requiring referral to the Mayor of London, below which there are increased prospects of developer interest. This height allows for a building with 10 residential floors above 3m high ground floor E1. This is similar to the higher part of the Collective building and is viewed by the neighbourhood forum as a maximum for a building that will affect views from Shaftesbury Gardens and the residential sections of Old Oak Lane.**

**Policy OONA 3B – Subject to the views of the property owners involved, to resist proposals for activated ground floors on both sides of the stretch of Old Oak Lane between Atlas Junction and the Grand Union Canal where this involves the compulsory purchase of housing in the Old Oak Conservation Area.**

**Reasoned Justification: The concept of a ‘high street’ with activated frontages on both sides of Old Oak Lane between Atlas Junction and the Grand Union Canal does not feature in the Local Plan or any other development plan document and is seen as harming the integrity of the Old Oak Conservation Area.**

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**Actions**

***Action 3.1 - To work with the Canal and River Trust and OPDC to achieve a long-term solution to providing access to the canal towpath. Two attempts at an Early Activation project in the form of a ramp at the bridge over the canal have not achieved a design that has prevented vandalism and graffiti.***

## CHAPTER 8 OONA SUB- AREA 4 – MIDLAND TERRACE AND SHAFTESBURY GARDENS

8.1 These two small and adjacent residential enclaves lie to the east of Victoria Road, a short distance south of the Atlas Road Junction. As for other sub-areas, OPDC drew a tight line around existing housing when setting the designated neighbourhood boundary in 2017. Hence there is only one development site included within this sub-area of the neighbourhood.

8.2 Since 2015 long established residents in the area have experienced huge uncertainties about OPDC plans. The Regulation 18 Draft Local Plan assumed a new Overground Station at Old Oak Common Lane, for which Midland Terrace would have been a major access and egress point. This and a second new station at Hythe Road were intended as the connection points with OOC station. The Hythe Road proposal was abandoned along with the Cargiant Masterplan in 2018. The Old Oak Common Lane station remains an (unfunded) aspiration as part of [TfL proposals for the West London Orbital line](#).

8.3 Both Midland Terrace and Shaftesbury Gardens have been severely impacted by HS2 construction compounds, including the overhead convener shown on the map below (now dismantled and removed).



*Midland Terrace/Shaftesbury Gardens sub-area with Old Oak neighbourhood area boundary shown as a blue line*

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8.4 Midland Terrace consists of 35 Edwardian terraced houses, some converted into flats and others remaining as family homes. Shaftesbury Gardens is a relative recent (1990s) development of 170 flats (housing association and owner occupied) with communal outdoor space.

8.5 The original TfL consultation proposals for an Old Oak Common Lane Overground station situated the platforms around 350 metres to the west of the HS2/Queen Elizabeth line station, at a point on the track of the North London Line between Old Oak Common Lane and Midland Terrace. The proposed location of this station is constrained by other railway lines, roads and residential properties. The station design consulted on included an 'overpass' or bridge from Old Oak Common Lane to Midland Terrace and possibly extending to Victoria Road. Forecast costs at the time were £155m (outturn prices assuming delivery in 2026 excluding land costs) to Midland Terrace only and £173m (outturn prices assuming delivery in 2026 excluding land costs) to Victoria Road.



Figure (15) location of previously proposed Overground station at Old Oak Common Lane



Midland Terrace looking west

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8.6 Clearly the character of Midland Terrace (currently a quiet cul-de-sac) would change greatly if this ever became an access and egress route to a new Overground station. Shaftesbury Gardens would also be affected.

8.7 An early CGI image of the completed station with a 'short' bridge is shown below.

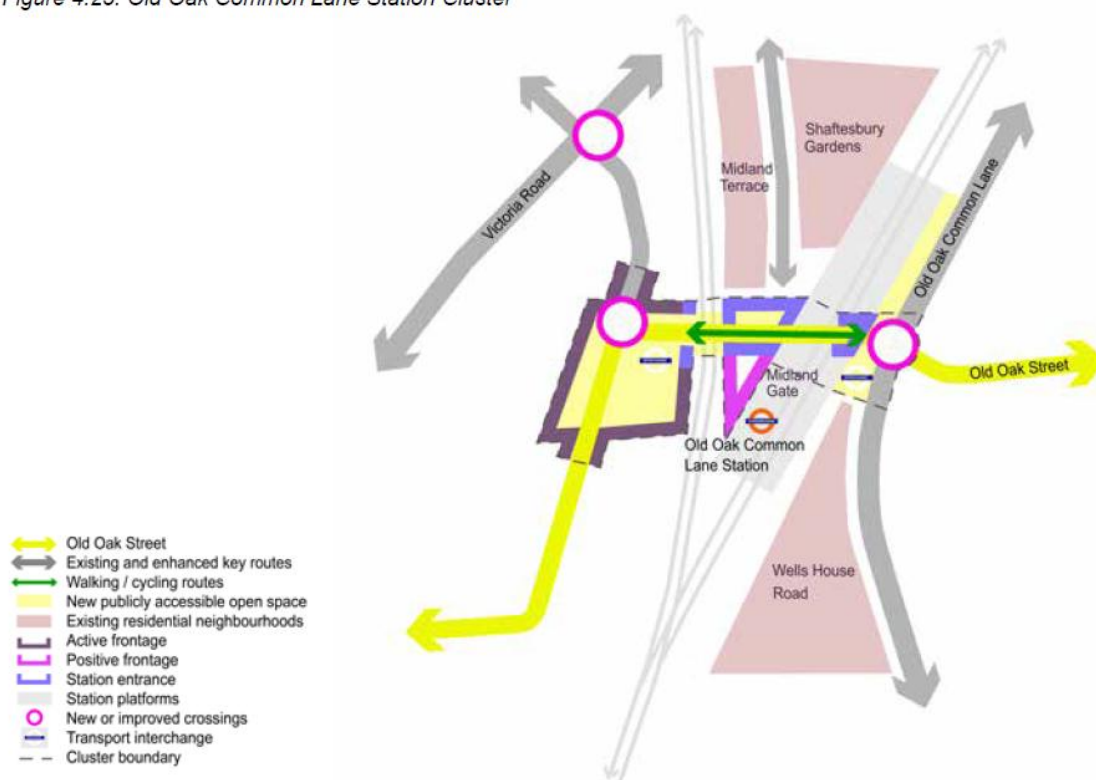


TfL 2017 CGI image of proposed Old Oak Common Lane station with access/egress on Midland Terrace

## 2022 Local Plan context

8.8 In the adopted Local Plan, this sub-area of the neighbourhood plan falls within the Old Oak Common Lane Cluster, as below:

Figure 4.25: Old Oak Common Lane Station Cluster



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## Midland Gate

8.9 This is the one significant development site in the sub-area. It is now in the ownership of OPDC. This site has a single gated access onto Midland Terrace and was previously occupied by a two-storey factory building destroyed by fire in September 2013.

8.10 In March 2018 the site was granted by OPDC an 18 month planning use (B8) as an open car storage facility for Linwest Ltd (also known as Acton Coachworks). A 2019 application to extend this use for 5 years was delegated by OPDC to LB Ealing, and is shown on the LBE website as having been withdrawn.

8.11 Policy P7C2 ‘Old Oak Common Lane Station Cluster’ of the OPDC Regulation 19 Draft Local Plan, promoted the site for mixed-use development. The site is not identified as a specific site allocation in Table 3.1 of the adopted Local Plan (or in the map of site allocations at Figure 3.17. Nor does it fall within the large an undelineated area seemed appropriate for Tall Building in Figure 3.15.

8.12 In the Old Oak West SPD, the site is not specifically mentioned in the Place and Cluster section on North Acton and Acton Wells Place (see overleaf). It features in the table in section 12 on Delivery and Implementation (page 114) as below:

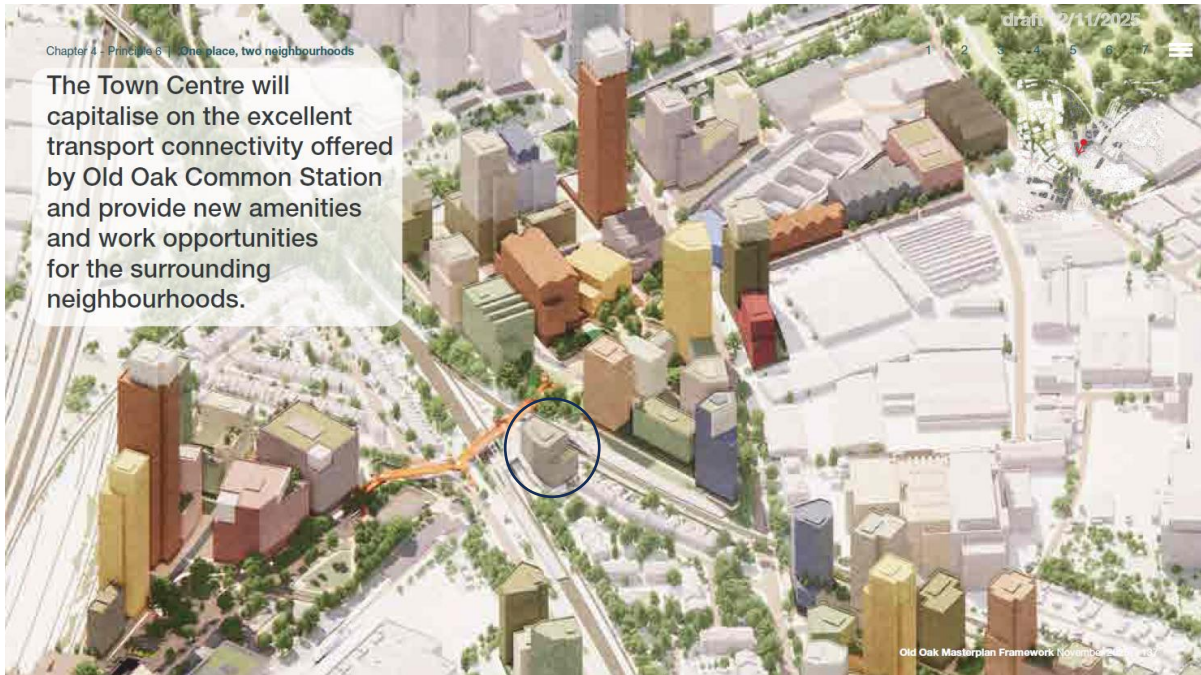
Site name	Site allocation number	Development Capacity Study Site number	Net additional housing units during the first ten years of the plan period	Net additional housing units during the 11 to 20 years of the plan period	Minimum commercial or industrial floorspace in square metres over the plan period. Floorspace is provided as Net Internal Areas (NIA).	New jobs resulting from the provision of commercial or industrial floorspace over plan period (indicative)
Midland Gate	Not a site allocation	30	50	0	0	0

8.13 This neighbourhood plan supports the principle of mixed use on the site and includes a specific policy OONA 4A for the site. Where this Draft Plan varies from the SPD is that we do not accept that the site has the capacity to deliver 50 housing units in the period 2018-28.

## Masterplan Framework

8.14 In this document the Midland Gate site features at No.9 on a map of ‘Development Zones’ on page 153. A graphic image of the newly defined ‘Old Oak Town Centre’ shows what appears to be a mid-rise building covering the site (see below). This would be a significant departure from the 2022 Local Plan and is resisted in this neighbourhood plan (see Draft Policy OONA 4A).

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### **Impact of the 2025 OPDC CPO Order**

8.15 The OPDC CPO Order, which was ‘made’ by the Development Corporation in September 2025 and remains subject to decision by the Secretary of State, includes a small piece of land owned by the Shaftesbury Gardens Management Company. This caused significant concern amongst leaseholders of these homes, alleviated to an extent when it became clear that OPDC were seeking short-term use of the land as a potential logistics site for development at Midland Gate. An inquiry on the CPO Order is expected in autumn 2026.

### **Cerebos Gardens and Midland Terrace Play Area**

8.16 A small play area at Midland Terrace has for many years provided a local amenity, coupled with strip of open space between Victoria Road and the buildings of Shaftesbury Gardens. These pieces of land along with Victoria Garden (on the other side of Victoria Road) were selected by OPDC as one their ‘early activation’ projects, working with local residents.

8.17 This project proved to be a genuine exercise in ‘co-design’ between the Corporation and the local community. Hayatsu Architects were appointed at the start of 2020 by a selection panel, which included community representatives.

8.18 The playspace project was subsequently implemented but the scheme for Cerebos Gardens was not (design costs having absorbed a large part of the available budget).

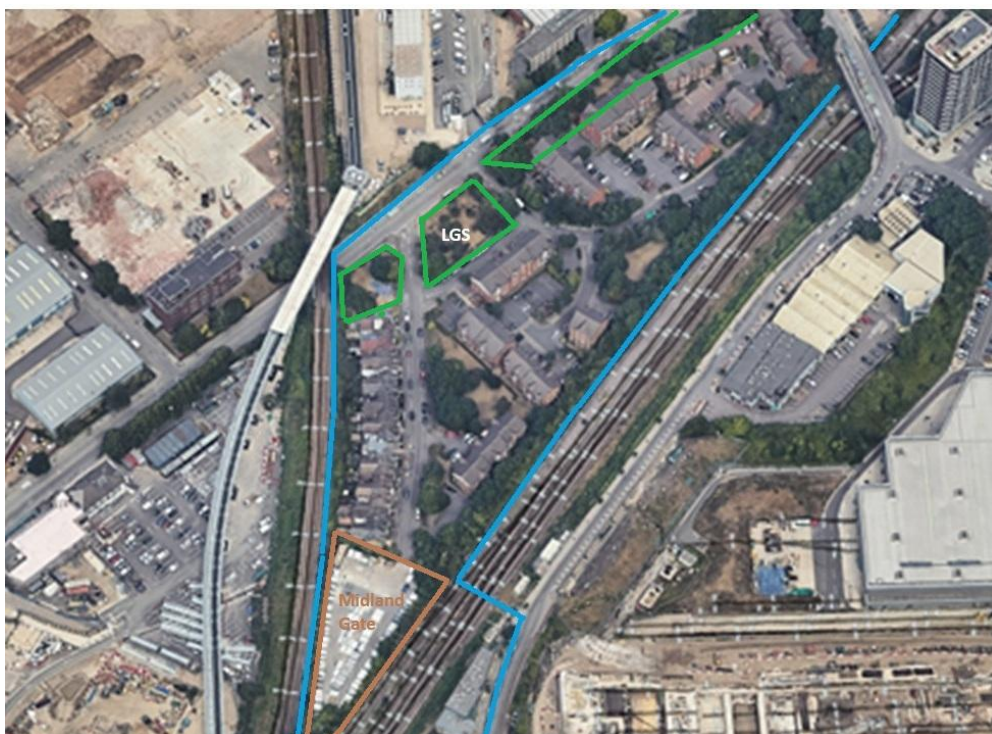
8.19 This neighbourhood plan proposes that Cerebos Gardens and the Play Area be designated as Local Green Space, via Policy OONA 4B below.

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CGI images of improvements at Cerebos Gardens

8.20 Neighbourhood Plan policies and actions for this sub-area are set out below:



**Policy OONA 4A – to allocate the site at Midland Gate (shown with a brown boundary above) for a mixed use development, primarily housing along with E1 commercial uses at ground floor (and scope for social/health/community uses above). With a maximum net residential density of 350 units/hectare and a maximum height of 8 storeys or 23m including any podium deck.**

**Reasoned justification: this site is not identified in the 2022 Local Plan as being suitable for Tall Buildings. Tall buildings within the OPDC area are defined as those above 15 storeys or 48 metres above ground level. Anything higher would be contrary to London Plan Policy D9. A taller building would impact severely on existing housing at Midland Terrace and Shaftesbury Gardens. This height allows**

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**for a building of 7 residential floors above E1 space at ground floor. The site has a PTAL level of 3 with limited vehicle access (from Midland Terrace only) and is not appropriate for higher density development.**



Midland Gate site

**OONA Policy 4B - to designate as Local Green Space the childrens play area and the two parts of Cerebos Gardens adjacent to Victoria Road (as shown with green boundaries in the map above).**

**Reasoned justification: This designation would give protection to well used green spaces for which improvements have been prepared by OPDC and implemented in the case of the childrens playground.**

**OONA Action 4A – to support the Shaftesbury Gardens Management in achieving an agreed outcome on the OPDC September 2025 CPO Order.**

## Chapter 9 OONA SUB-AREA 5 WELLS HOUSE ROAD

9.1 Wells House Road is a triangular area with its one continuous street serving 120 Edwardian semi-detached houses built on either side of the road. As a residential enclave the area has always had vehicle access only to and from Old Oak Common Lane. Midland Terrace and Victoria Road lie close by as the crow flies (but separated by rail tracks).

9.2. The boundary of the neighbourhood area was drawn by OPDC very tightly around the existing housing at Wells House Road. This left little scope for a neighbourhood plan to bring about any change. Wells House Road is midway between North Acton and Willesden Junction station and these houses have PTAL level between 1b and 3 (unusually low or locations in the inner/outer London border).



*Map of OONA sub-area 5 Wells House Road showing neighbourhood boundary in blue*

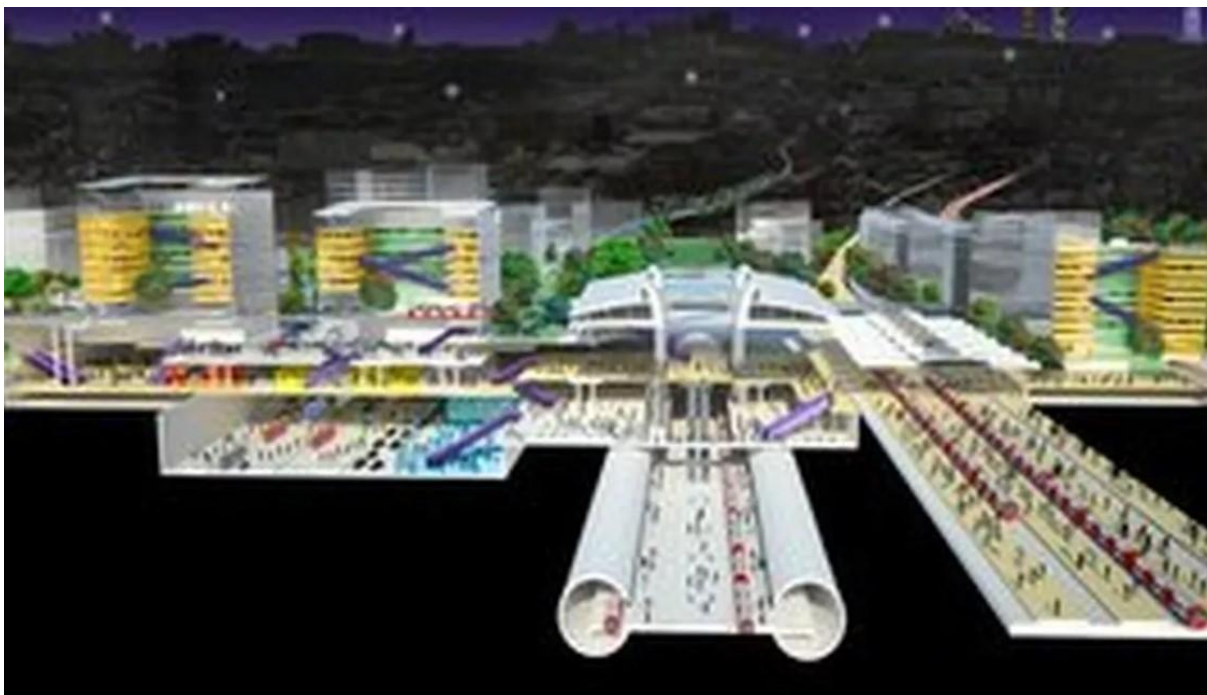
9.3 This sub-area within the 2021 neighbourhood area boundary has its sole entrance/exit on Old Oak Common Lane, close to the existing entrance/exit across the road for the OOC station site. For over a decade, the residents association at Wells House Road has been at forefront of those dealing with impacts of construction works as well as the long-term impacts of a £1.7bn rail interchange with a single vehicle access on a road never designed to deal with high volumes of traffic. Temporary traffic lights have been a frequent feature. The continuing threat of a four year complete closure of this road from 2028 (for HS2 bridgeworks to take place) is one of multiple problems with which Wells House Road residents have had to contend.

9.4 Next to the OOC station sites former railway land badged by HS2 as 'the Adjacent Site' and currently cleared. This site was allocated for high density commercial

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floorspace in the 2016 Regulation 18 Local Plan and this proposed use has not changed.

9.5 Prior to the Mayoral OAPF, architect Terry Farrell was commissioned by LB Hammersmith & Fulham to work up ideas for OOC station. These plans (published in 2011) included creating a podium deck and 'overbuilding' parts of the station. The proposals were well received at the time, but subsequently dropped in 2015 on grounds of cost, construction issues and differing timetables. This scenario was viewed by Farrell as a major lost opportunity to create a potential 12,000 homes and a major commercial/retail centre.<sup>16</sup>



*Image of Terry Farrell design for 'Park Royal City'*

### **The 'Adjacent Site'**

9.6 Immediately next to the site where the Old Oak Common Station is being built is a triangular area of land known as the 'Adjacent Site'. This land is one of the four main construction compounds owned by DfT. In 2019 this piece of land was marketed by the Commercial arm of HS2 (see below). A more detailed set of HS2 proposals for this site also surfaced in 2022.

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<sup>16</sup> [Farrell: Old Oak Common 'worst cock-up in years'](#)

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## Design supports future development

### Key Design Features:

- Designed to Pedestrian Modelling Scenario 2B (2041 +35% growth) and stress tested against full OPDC build out, Crossrail upgrade and TfL Overground Stations (scenario 8)
- OOC lane junction designed to accommodate future TfL Overground Station
- ASD boundary line optimised to maximise ASD potential (Achieving >200,000m<sup>2</sup> of development potential)
- Coordinated design with potential future Hybrid Bridge and elevated pedestrian link (now Old Oak Bridge).



Table 1 - Pedestrian Demand Forecast Scenario Assumptions

Passenger Demand Scenario	HS2 trains per hour	OPDC stations per hour	Overground stations included	Crossrail trains per hour	OPDC Development 2038 Buildout
Scenario 1A	18	19	No	24	No
Scenario 2B	18	24	No	24	No
Scenario 3	18	24	Yes	24	No
Scenario 4	18	24	Yes	30	No
Scenario 5	18	19	No	24	Yes
Scenario 6	18	24	No	24	Yes
Scenario 7	18	24	Yes	24	Yes
Scenario 8	18	24	Yes	30	Yes

2019 HS2 marketing material of the Adjacent Site

9.7 To the confusion of the public, HS2 for many years consistently showed images of this site in its public consultation material. The image (below) was of a new rail interchange in a green field, rather than a site for high density commercial office and retail development.



HS2 CGI image of Old Oak Common station, showing the 'Adjacent Site' with no future development

9.8 The fact that this contradictory information continued to be published for several years was raised with the OPDC Board Chair in early 2019. Commitments were given of improved liaison between OPDC and HS2. Yet the same HS2 2019 consultation leaflet remained on the HS2 Commonplace website for Old Oak Common until 2021.

This history is rehearsed in this neighbourhood plan for two reasons:

- A reminder of the length of time during which residents of Wells House Road have faced uncertainties and drastic changes of plan for their surroundings dating back over a decade (including Cargiant's 2015-18 proposals for Old Oak Park and a 'major town centre at Hythe Road).
- To reinforce the case for well planned 'meanwhile regeneration' around OOC station for the period 2026-40. *HS2 2022 slide on potential development on the Adjacent Site opposite Wells House Road.*

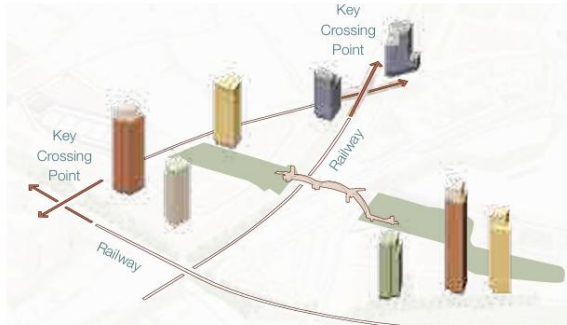
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## The OPDC Masterplan Framework 2025

9.9 OPDC's 'Framework' document setting out its 2025 Old Oak Masterplan incorporates a new and varied set of proposals for the area around Wells House Road. This follows four iterations of the Local Plan and a fifth version included in the 2024 Old Oak West SPD. This latest masterplan involves significant changes from the adopted 2022 Local Plan.



The 2025 Masterplan shows Wells House Road lying between two parts of what is described as *a new urban centre for West London, at the heart of WestTech London, with unrivalled connectivity*. New emphasis is placed on the east west bridge connecting Acton Wells to OOC station and on attracting 'anchor uses'



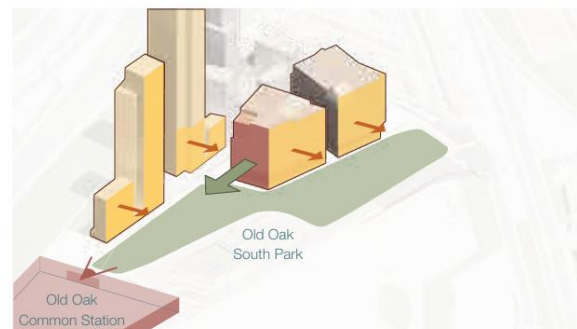
Tall buildings located along the railways and key crossing points



Lower heights adjacent to Wells House Triangle and Midland Terrace



Southerly building heights reduced to maintain sunny parks



Buildings defining the single-sided Old Oak South Park and providing a prominent facade

9.10 The potential impacts of this approach are shown in the above images (page 135 of the Masterplan Framework). It is hard to think of other 'major town centres' in London which have been planned, and have sustained successfully, on either side of a triangle

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of 120 semi-detached Edwardian houses and with a bridge connection to the main public transport node.

9.11 Assumptions that it will prove possible to attract ‘anchor uses’ to this destination are questioned by local people. As noted in the section on transport and connectivity in this draft neighbourhood plan, this location has low-to-medium levels of access to public transport (PTAL levels) and these may not improve before 2040.

9.12 The ‘anchor uses’ envisaged in the Masterplan include *academic institutions, innovation hubs, cultural and entertainment centres, FE and technical colleges, and an integrated leisure centre*. North Acton has a major development site at One Portal Way destined for some academic uses amongst the recent additions of student housing blocks, where a meanwhile use is now proposed.

9.13 Local people are sceptical that these ‘anchor uses’ will be attracted to the Acton Wells location in the next 15 years – unless the West London Orbital project is implemented.

9.14 This part of London will be competing with Hammersmith with its established ‘innovation zone’ and the major theatre/music venue/cinemas opening shortly at Olympia. OPDC previously used consultants to explore levels of interest from London museums in locating an offshoot at Old Oak, following the example of V&A East, with no apparent success. North Acton, despite its new ‘cluster’ of buildings, is the opposite of a ‘destination’. Student blogs make clear the lack of anything to do locally in the evenings and the need to travel into central London.

9.15 Given the lack of any development sites at Wells House Road, there is little that a neighbourhood plan can argue for in this chapter, other than to try to point OODC in the direction of a ‘meanwhile regeneration’ approach until levels of investment interest at Acton Wells become more clear.

### **Creating the ‘Old Oak Line’**

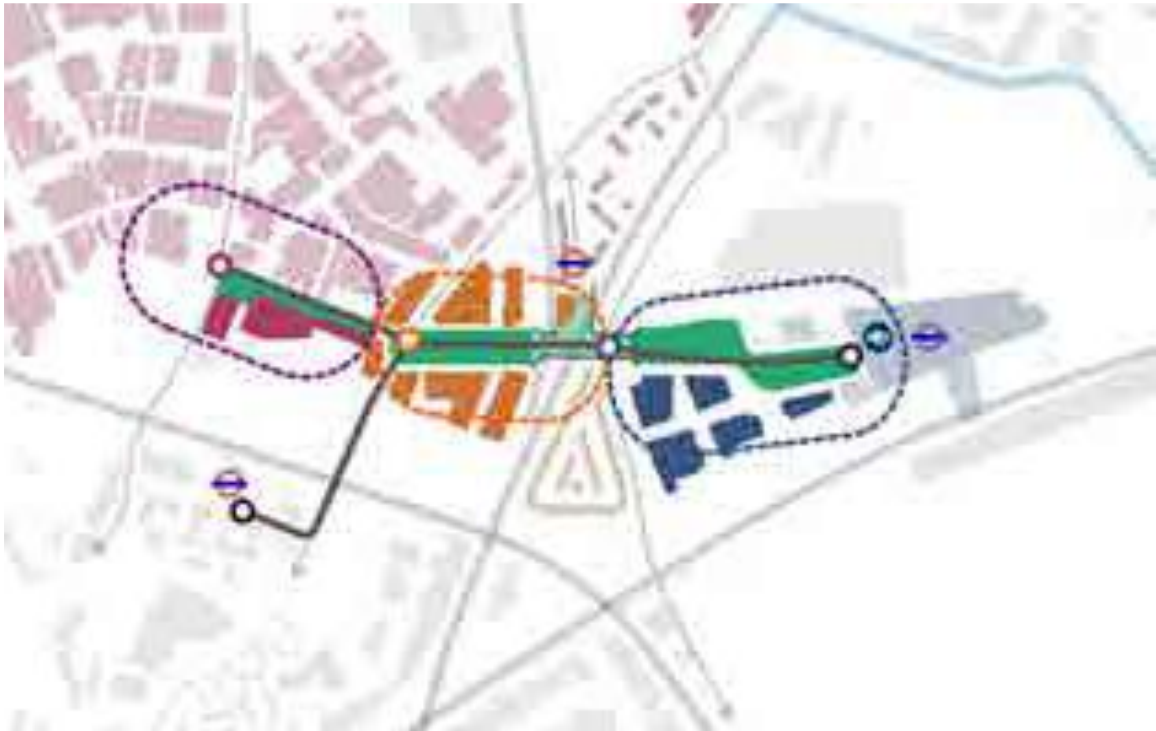
9.16 The 2022 Local Plan assumes an east/west ped/cycle bridge that will connect OOC station with what is defined as the North Acton and Acton Wells Place. This has an accompanying set of Place Policies P7.

9.17 In the 2025 Masterplan Framework, increased emphasis is placed on the potential connectivity that such as bridge would bring. It is rebadged (again) from being called ‘Old Oak Street’ to a new name the ‘Old Oak Line’. This piece of infrastructure is promoted as connecting three mixed use clusters of different characters, related to their different contexts as shown in diagrammatic form below.

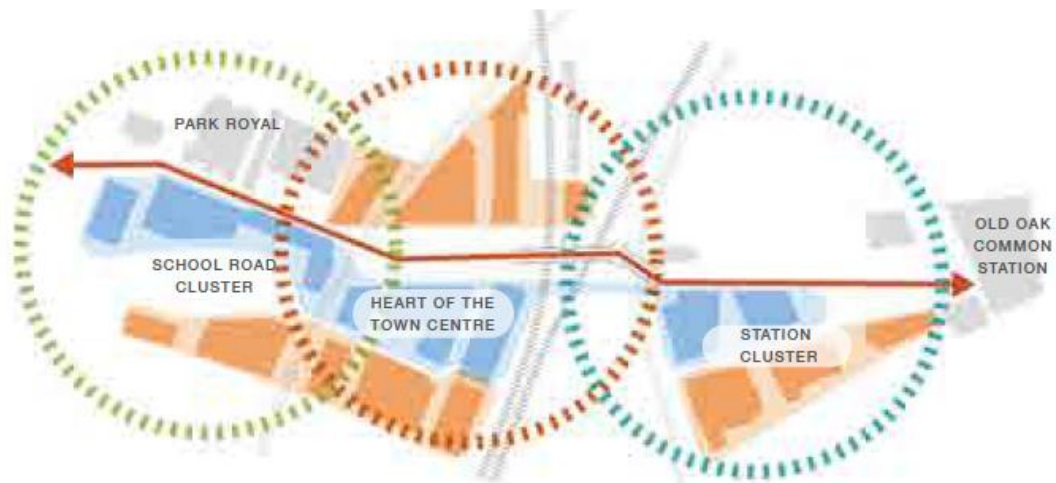
9.18 Local residents impacted on by this new bridge have yet to obtain any clarity as when OPDC intends to commission the construction of this bridge. It is illustrated as having a series of entry and exit points (see below). Its relationship with Midland Terrace is not shown in any detail. OPDC has acquired a property at Kildun Court in Old

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Oak Common Lane, and has rehoused its occupants, on the basis that this site is required for bridge foundations.



*Diagram of the 'Old Oak Line' from OPDC Masterplan Framework*

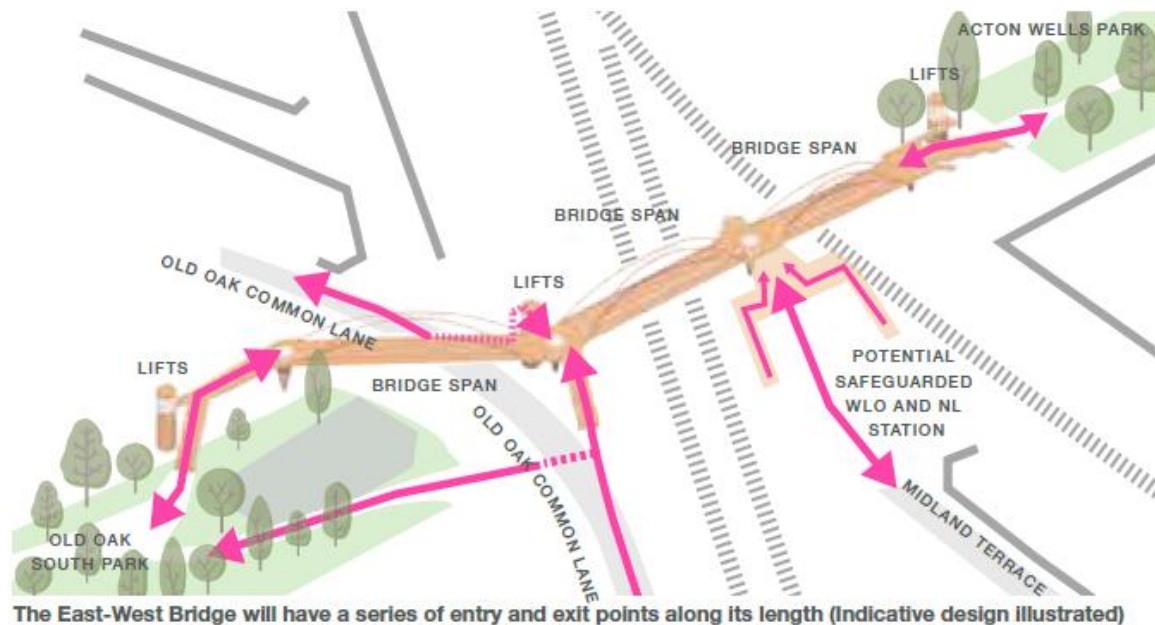


*The 'three clusters' propose to be connected by the Old Oak Line*

9.19 Our Forum questions the merits of constructing this bridge unless and until there is certainty of the opening date for OOC station and the two projects can be phased in

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parallel. Until some explanation is provided on the timing of proposal bridge construction, and the funding source becomes clear, this neighbourhood plan proposes a 'safeguarding' policy and site allocation OONA 5A



*Diagram of the bridge creating the 'Old Oak Line'. Again this image is shown as looking from the north to the south, rather than the normal mapping convention, with the OOC station site on the left.*

## Neighbourhood Plan 'Actions' which could bring benefits to Wells House Road

9.20 Some of the 'neighbourhood-wide' policies in this Draft Plan will be of benefit to residents in Wells House Road (e.g. on HMOs) along with this Plan's efforts to moderate OPDC's Masterplan proposals for housing densities and Tall Buildings. There are also some 'Actions' set out below which are not planning policies, but which are strongly supported by local residents.

9.21 In 2025 residents in Wells House Road set up the Old Oak Alliance. This is a WhatsApp network focused mainly on interaction with HS2 and its construction consortia working at Old Oak Common station. The Alliance has been active trying to ensure greater involvement of Ealing MP Rupa Huq and ward councillors in mitigating HS2 construction impacts.

9.21 Ealing Council is seen locally as having been far less effective than Camden Council, in securing Assurances and Undertakings within the 2017 HS2 Act. Less local authority support has been provided than in Camden, in helping to resolve problems and complaints with HS2. The Alliance has been trying to achieve an updated set of Assurances, as part of the HS2 reset.

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## Neighbourhood Plan policies and 'actions' for OONA sub-area 5 Wells House Road

**OONA Policy 5A – to safeguard the sites needed to construct the east west bridge in accordance with Local Plan Policy P7(m) for Place North Acton and Acton Wells**

*Reasoned justification: until it becomes evident over what timeline Old Oak Common station will be completed and in operation, commissioning and phasing the construction of this high cost piece of infrastructure would be premature.*

*Action OONA 5A To support the Wells House Residents Association and the Old Oak Alliance in questioning the necessity to lower the bridges on Old Oak Common Lane in order to allow the use of double decker buses as surface transport to and from Old Oak Common Station.*

*To support local residents in seeking updated Undertakings and Assurances from HS2 in respect of the potential extended closure of Old Oak Common Lane and reconstruction of the retaining wall on the west side of Wells House Road are fully met, along with remediation measures for the impact of HS2 works. This location has been recognised by HS2 as having the greatest harmful impacts of anywhere along the HS2 line..*

## ANNEXE A

# Indicative Housing Requirement for the Old Oak Neighbourhood Area

### Purpose of this Note

This note sets out an Indicative Housing Requirement (IHR) for the Old Oak Neighbourhood Area and how it has been identified.

### Indicative Housing Requirement

The IHR for the Old Oak Neighbourhood Area is a **minimum of 510 new homes**.

### Methodology

#### Provision of an IHR

The draft National Planning Policy Framework (NPPF) policy HO2(5) requires local planning authorities (LPA) to provide an indicative housing figure for neighbourhood areas if there is not one currently in a Local Plan. Previously the PPG required neighbourhood forums to request an IHR from their LPA.

#### Developing an IHR

The draft NPPF policy HO2(5) lists three factors should be taken into account in developing the IHR. These are set out in table 1 with a description of how they have been considered for developing the IHR for the Old Oak Neighbourhood Area:

*Table 1: Factors and overview of their consideration*

Factor	Source	Consideration of use
<b>Latest evidence of local housing need</b>	<a href="#">OPDC Strategic Housing Market Assessment (SHMA) 2018</a>	The SHMA identified the housing market area for the OPDC area to comprise the three host boroughs. This identified a total housing need of 98,955 homes over the twenty-year period between 2017 and 2037. <b>The minimum housing capacities identified for the Local Plan development sites are optimised to help meet this need.</b>  A Local Housing Needs Assessment is being produced to inform the next OPDC Local Plan. This emerging assessment continues to demonstrate a high level of need of housing between 2025 and 2050 of over 227,000 homes.
<b>Population of the neighbourhood area</b>	2,561 (Census 2021)	The 2021 Census identified an existing population of 2,561 people living in the Old Oak Neighbourhood Area. <b>The current population needs to be considered in the context of the growth across the OPDC area where over 26,000 homes are expected to be delivered.</b>
<b>Most recently available planning strategy of the local planning authority</b>	<a href="#">OPDC Local Plan 2022</a> and <a href="#">OPDC Old Oak West SPD 2024</a>	The most recent LPA planning strategies relevant to the Old Oak Neighbourhood Area comprise the Local Plan and Old Oak West SPD. The Old Oak West SPD is aligned with the Local Plan.  These identify: <ul style="list-style-type: none"> <li>specific development sites, and their minimum housing capacities, within the neighbourhood area. These comprise site allocations and other Local Plan development sites in OPDC's <a href="#">Development Capacity</a></li> </ul>

		<p><a href="#">Study Update 2021</a> which contribute to the Local Plan's total housing capacities as set out in table 2 below.</p> <ul style="list-style-type: none"> <li>• that portions of the Old Oak Neighbourhood Area fall within: <ul style="list-style-type: none"> <li>○ the emerging Old Oak major town centre meaning sites will benefit from new and enhanced access to town centre uses, social infrastructure and public open spaces.</li> <li>○ sensitive locations.</li> </ul> </li> <li>• That the area will also benefit from enhanced public transport access and active travel networks.</li> </ul> <p><b>The above demonstrate the area has been allocated as an area for growth while appropriately responding to sensitive locations. These elements were considered when defining the capacities of the development sites during the Local Plan plan making process.</b></p>
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Table 2: OPDC Local Plan site allocations and development sites

Site	Site reference	Minimum homes capacity
<b>Goodhall Street East</b>	DCS site 54 (part of)	42
<b>Ursula Lapp</b>	DCS site 55	250
<b>Lords Builders Merchants</b>	Site allocation 26 (part of)	158
<b>Old Oak Cafe (2 Victoria Terrace)</b>	DCS site 16	10
<b>Midland Gate</b>	DCS site 30	50
<b>Total</b>		<b>510</b>

#### Relationship between the PPG and draft NPPF

The 2019 PPG currently provides guidance relating to developing an IHR which does not fully align with the draft NPPF. It states there is “not set method” for defining an IHR. It provides references to using content that is consistent with the draft NPPF comprising considering the spatial strategy, Housing and Economic Land Availability Assessment and population; however, it refers to considering the characteristics of the area and its role in providing services which are not referred to in the draft NPPF. Therefore, for the purposes of defining an IHR for the Old Oak Neighbourhood Area, these latter two elements have not been considered.

#### Examining an IHR

PPG Paragraph: 104 Reference ID: 41-104-20190509 notes that a neighbourhood area housing requirement figure, which is stated within a Local Plan, is not retested at the Examination of a neighbourhood Plan. However, it states that an indicative housing requirement figure will need to be tested at examination.