



Old Oak Neighbourhood Forum and Grand Union Alliance

Wednesday October 7th 2026

On Zoom

Agenda for this evening

1. OONF response to consultation on the Draft London Plan
2. How the Draft London Plan could affect OPDC Plans (Optimisation Framework and 'SAM scores'.
3. Feedback from OPDC Board 24th Sept and Audit Committee
4. OPDC's response on the Draft Old Oak Neighbourhood Plan
5. OONF response to consultation on West London Orbital
6. HS2 update – any significant news?
7. AOB and date of next meeting

What is the London Plan?

- The statutory **spatial development strategy** for Greater London
- It sits between the **NPPF and Local Plans**
- It guides where homes jobs and infrastructure should be delivered **across London over the next 20 years**
- The draft Plan is **shorter, more focused** and more closely aligned with the new NPPF
- Local Plans need to be in **general conformity**, meet **targets** and test indicative **capacities**
- continues to **support significant growth at Old Oak and Park Royal**

OPDC Local Plan dates from 2022. Next version due for adoption December 2029. The Masterplan Framework is not a 'development plan document'.

Growth and regeneration focus

- Approximately **558,000 homes** planned over the next decade
 - OPDC's new 10-year housing target is **11,335 homes**
- Focus on **brownfield regeneration** and making the **best use of land**
- OPDC area continues to be a **major growth location** as an **Opportunity Area** and is within both the 'HS2' and 'Elizabeth Line West & Heathrow' **Strategic Growth Corridors**
- OPDC's new Opportunity Area indicative capacities are:
 - **23,000 homes**
 - **19,900 jobs**
- **Growth** to be linked to **transport investment** and **infrastructure**

Consultation on the Draft London Plan

The consultation runs until 15th October. OONF responded to the previous consultation on *Towards a New London Plan*.

The new version will replace the 2021 London Plan but first has to be examined. Adoption expected in early 2028.

Needs to conform with the **August 2026 new NPPF** (now in force).

The new NPPF and London Plan raise a key question for the Old Oak area: ***when should 'planned' rather than 'existing' transport improvements start impacting on decisions on planning applications, when new infrastructure remains 10-15 years away?***

The new NPPF – other key features

Housing Supply & Growth

- Reinforces **ambitious national housing targets** and the revised **standard method of allocating these to planning authorities**.
- Strong pro-supply stance: “**default yes**” for development around **well-connected stations** (expanded to top **80** Travel-to-Work Areas).
- **Minimum densities** strengthened, especially around rail stations; wider support for **intensification** including infill and upward extensions.

This focus on an 800m walking distance from stations will support OPDC's Masterplan ambitions in the long term. But less so in 2026 when OOC station is 10-15 years away and the West London Orbital remains uncommitted and unfunded. These points are not mentioned on OPDC slides.

New NPPF Policy S5

1. Policy S5 — Development outside settlements (including station-led growth)

Takeaway: Development **within a reasonable walking distance (~800m)** of a **well-connected station** should **normally be approved**, unless adverse impacts substantially outweigh benefits.

Key elements:

- Applies to **train, tram, Underground, Overground, DLR, Elizabeth Line** — the NPPF is **mode-agnostic**.
- No requirement to show:
 - unmet need
 - absence of a five-year housing land supply
- Designed as a **national intensification tool** where local plans lag behind assessed need.

MBUL2 OPTIMISING THE USE OF LAND AND SITE CAPACITY

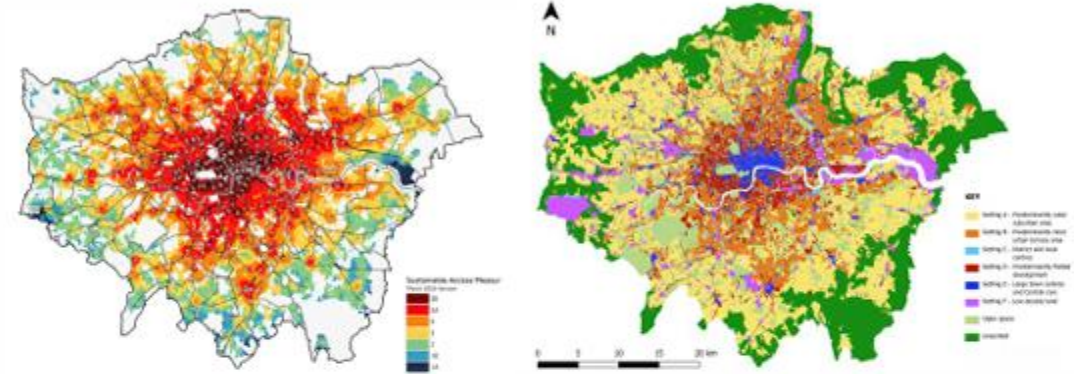
This is a new policy approach in the Plan

- Introduces new planning tool called the **Optimisation Framework** for large sites. It embeds the core principle of linking the relationship between residential density and public transport connectivity.
- It forms the crux of the spatial strategy in terms of optimisation in the draft Plan.
- **Provides a baseline** expectation for what site optimisation means across different parts of London - by providing a density and building height range for different areas across London – depending on their public transport connectivity and context.
- Policy link to the **London Small Site Design Code** (LSSDC) which will apply across London. This Code seeks to streamline the planning process for small site proposals that comply with it.



HOW DOES THE OPTIMISATION FRAMEWORK WORK?

- It uses a new Sustainable Access Measure (SAM) and London Context Map
- The Policy provides a table which sets out a density and building height range for different areas. As a design input, the inclusion of a building height range seeks to provide greater clarity on the expected form of development
- Once the assumed height range/density is identified for a site, the applicant should then identify the areas potential and/or sensitivity to change inform where in the range is optimal and carry out a site-specific design response
- Density measure is expressed in habitable rooms per hectare in order to avoid incentivising smaller dwellings
- Promotes greater use of mid-rise development due to the many benefits this form of development has over others

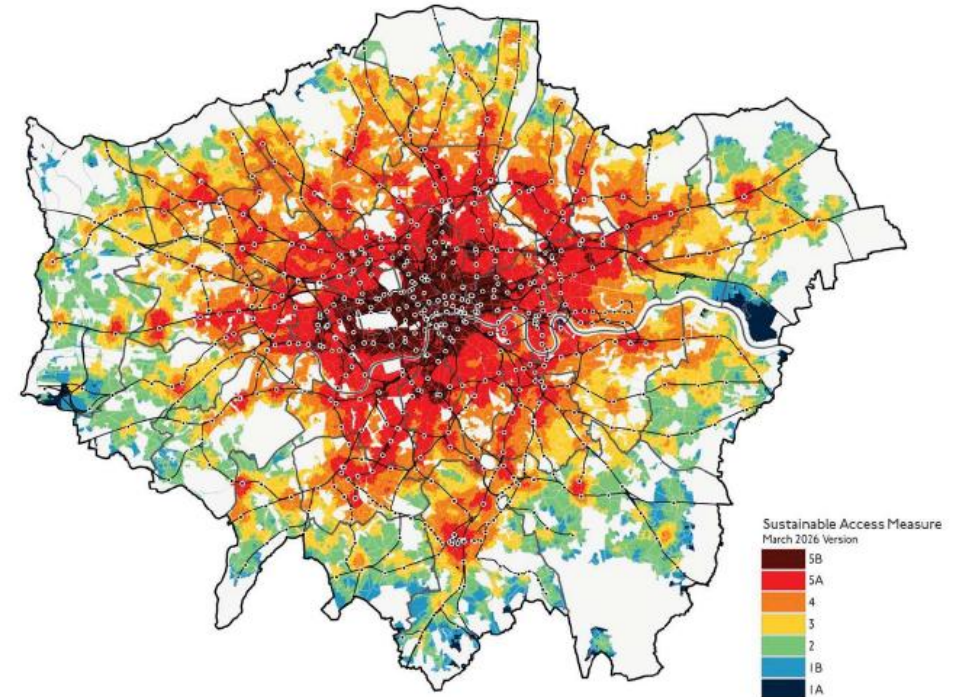


Context	Description	SAM 2	SAM 3	SAM 4	SAM 5A	SAM 5B
Setting A	Predominantly outer suburban area	3 - 4 storeys 220 - 410 hr/h	3 - 5 storeys 280 - 510 hr/h	3 - 6 storeys 340 - 610 hr/h	3 - 7 storeys 440 - 750 hr/h	4 - 7 storeys 500 - 830 hr/h
Setting B	Predominantly inner urban terrace area	3 - 5 storeys 260 - 480 hr/h	3 - 6 storeys 330 - 580 hr/h	3 - 7 storeys 400 - 680 hr/h	4 - 7 storeys 500 - 830 hr/h	4 - 8 storeys 510 - 910 hr/h
Setting C	District and local centres	3 - 5 storeys 300 - 530 hr/h	3 - 6 storeys 370 - 640 hr/h	3 - 7 storeys 440 - 750 hr/h	4 - 8 storeys 490 - 900 hr/h	5 - 9 storeys 550 - 990 hr/h
Setting D	Predominantly flatted development	3 - 6 storeys 370 - 650 hr/h	4 - 7 storeys 420 - 760 hr/h	4 - 8 storeys 470 - 880 hr/h	5 - 9 storeys 590 - 1040 hr/h	5 - 10 storeys 600 - 1130 hr/h
Setting E	Large town centres and Central core	4 - 7 storeys 420 - 710 hr/h	4 - 8 storeys 440 - 830 hr/h	5 - 9 storeys 490 - 950 hr/h	5 - 10 storeys 550 - 1080 hr/h	5 - 11 storeys 610 - 1170 hr/h
Setting F	Low density land	4 - 8 storeys 450 - 830 hr/h	5 - 9 storeys 520 - 950 hr/h	5 - 10 storeys 560 - 1080 hr/h	5 - 11 storeys 650 - 1220 hr/h	5 - 12 storeys 650 - 1300 hr/h



Sustainable Access Measures (SAM)

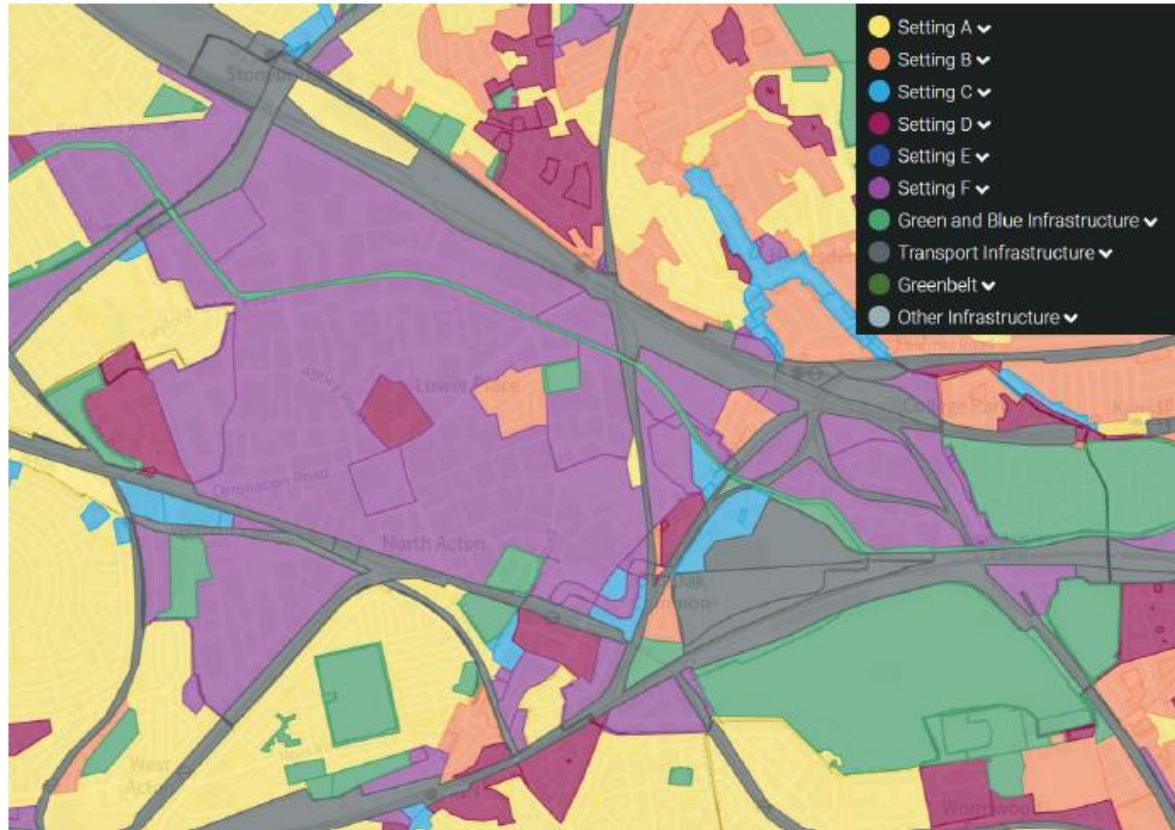
Sustainable Access Measures (SAM) provide a **pan-London accessibility score** showing how much of everyday London a resident can reach **within realistic travel times by public transport and walking**. Unlike PTAL, which only measures ease of *entering* the network, SAM measures access to **jobs, services and facilities**. Scores are calculated for every **100m × 100m grid square**.



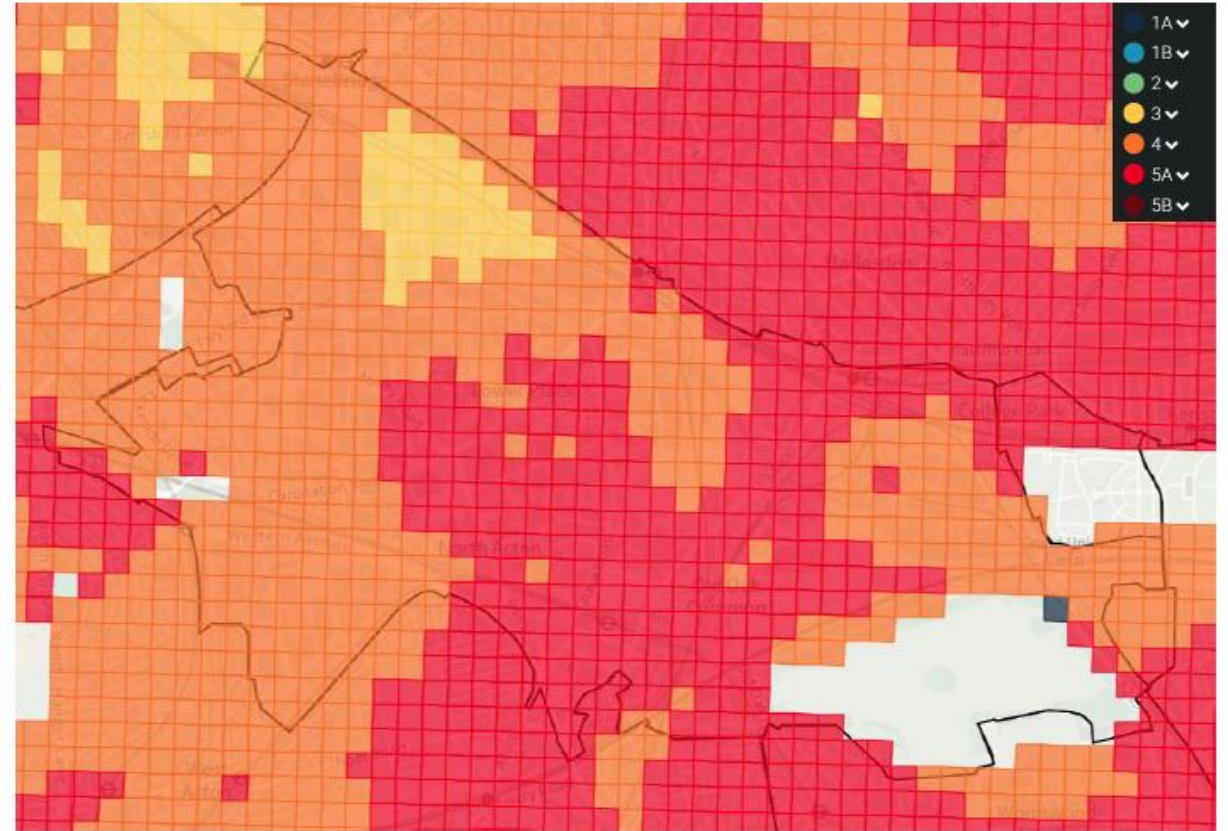
[Making Sense of TfL's new Sustainable Access Measure \(SAM\) · Podaris: Blog](#)

Density, heights and tall buildings

London Context Map

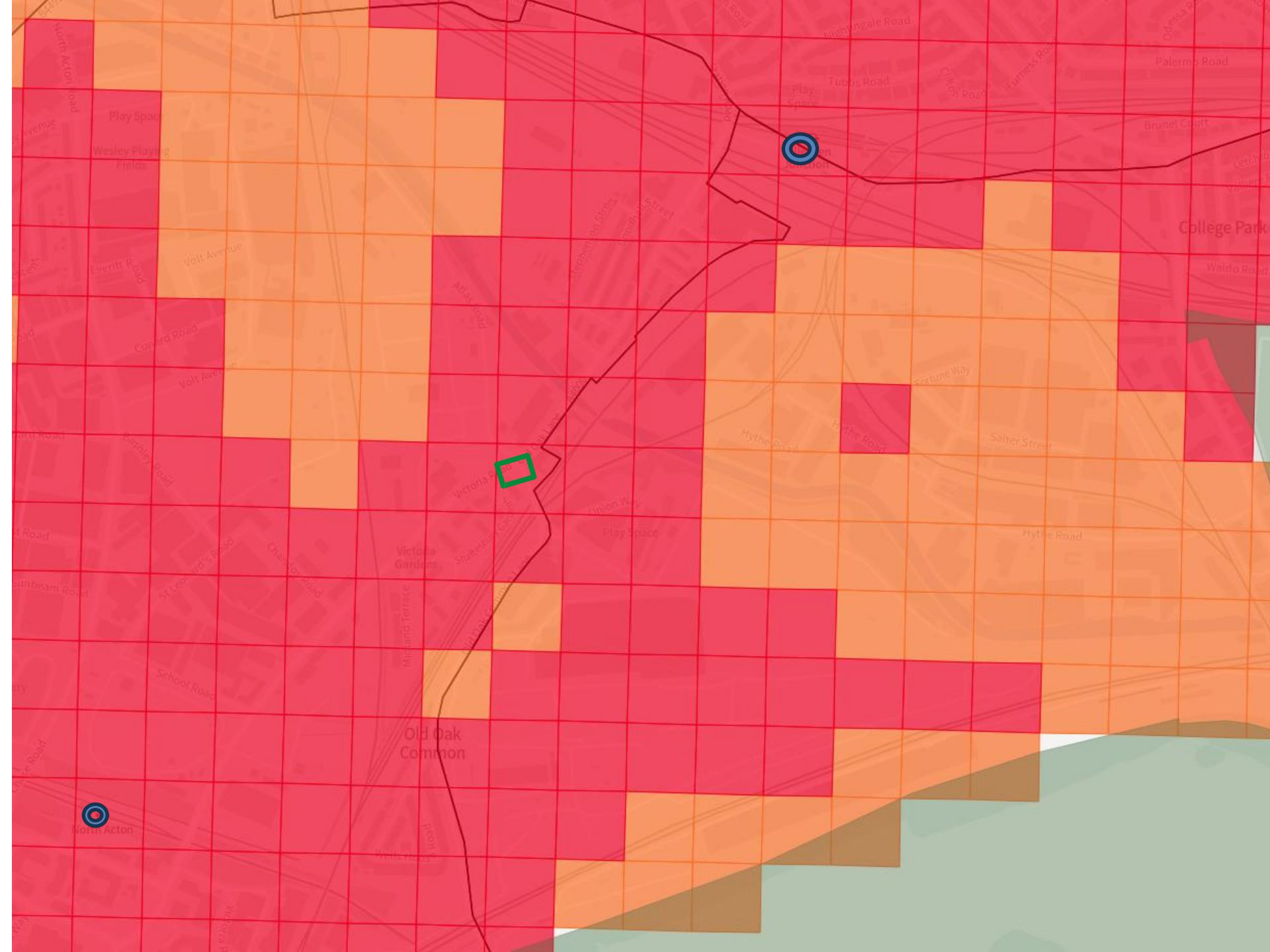
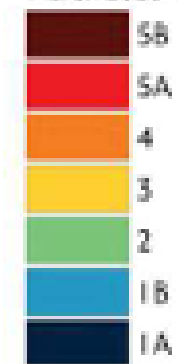


SAM map: shows existing connectivity by public transport and walking



OPDC slide as shown to OPDC Planning Committee. Note the labelling of the SAM map as showing 'existing' connectivity whereas OOC station is assumed.

Sustainable Access Measure March 2026 Version



How should OONF respond on the London Plan?

We can repeat some of the points we made in the 2025 consultation

Support GLA's recent thinking on the benefits of mid-rise housing

Focus our response on one simple theme:

The Forum supports the principle of re-introducing a policy that links net housing density with public transport access and walking distances.

*Such a policy must **not** be based on modelling that includes 'planned' major transport infrastructure that remains 10-15 years away.*

*The new London map of SAM scores must be published in a form showing **existing** as well as **planned** new infrastructure if it is to be used in development management decisions.*

Points from our previous response are shown on the next slide.

OONF comments in 2025 on Towards a New London Plan

- A tightly focused independent review of OPDC's 'Old Oak Project' at Old Oak West is needed, to ensure that the OPDC's intention to press on with selection of a Master Developer in 2026 is the most appropriate timeline in relation to further delays on HS2 and Old Oak Common station.
- Such a review to advise on whether the status of OA should be changed from '*nascent*' to '*underway*' as proposed in the current set of GLA 'pen portraits'.
- We suggest suspension of the 25,000 housing target for the Opportunity Area and replacement with an 'adaptive' 18,000 target over the next two decades.
- Net residential densities on new applications should be made explicit and capped until the updated OPDC Strategic Transport Study is available.
- A comprehensive meanwhile strategy for the Old Oak Project area, with greater Borough and community involvement, should be prepared.
- Adjustments should be made to London Plan to policies and guidance on an 'over-concentration' of student accommodation to distinguish between locations with a university campus and 'student dormitories' of the type that has developed at North Acton

Strategic vision for the Opportunity Area

'The OA will be anchored by the new Old Oak Common station, connecting the area to Heathrow, central London and to major UK innovation hubs. Additional transport improvements are also planned in the area including a potential new station on the Mildmay and West London Orbital lines at Old Oak Common Lane, new bus infrastructure and active travel networks.'

Old Oak will be established as a new town centre delivering a balanced mix of town centre, employment and community uses. Development should be planned and delivered comprehensively around Old Oak Common station to maximise its strategic transport role and support placemaking at scale'.

Indicative homes: 23,000

Indicative jobs: 19,900 (LESD 2024)

OA status: Maturing

June 2025 classification of the Opportunity area was 'Underway'. What has happened since to uprate this to 'Maturing'? We will raise this the OONF consultation response.

Further points for our London Plan response

- We welcome the principle of policies that link housing density to wider 'connectivity' as well as access to public transport.
- Policy MBUL2 must reflect both 'existing' and 'future' connectivity
- We support a policy on data centres – this should be tougher
- We welcome clearer strategic guidance from the London Plan on targets for student accommodation. North Acton already meets the draft target and more units would be a serious 'over-concentration'.
- We welcome the increased promotion of 'mid-rise housing'. The model of Build-to-Rent towers in Opportunity Areas is not working.

Further London Plan response points (2)

The Draft London Plan divides boroughs into 'locational bands' to which varied affordable housing thresholds will apply.

OPDC bands vary across boroughs. OPDC will be lobbying to have a single band. Looks like this will be 25% affordable for fast track.

The Draft London Plan also introduces a designation of Major Metropolitan Clusters towards which 100m high (30+ storeys) buildings should be directed.

North Acton, Acton Wells and 'the area around OOC station' is listed as a MMC area. OPDC's next local plan will define the precise boundary. We need to respond now.

Can a NP influence the boundary of a MMC?

- **Yes**, a neighbourhood plan can include a policy resisting inclusion in a future MMC boundary.
- It cannot ultimately prevent designation, but it **can** be a **material consideration** and influence the LPA's evidence base and decision-making.
- This is consistent with past practice where NPs have varied or refined local designations.
- For OPDC, such a policy could be strategically significant in the years before the next Local Plan review.

OPDC's response to our Draft neighbourhood plan

Two responses sent, one from 'the LPA' and one from the Delivery Team.

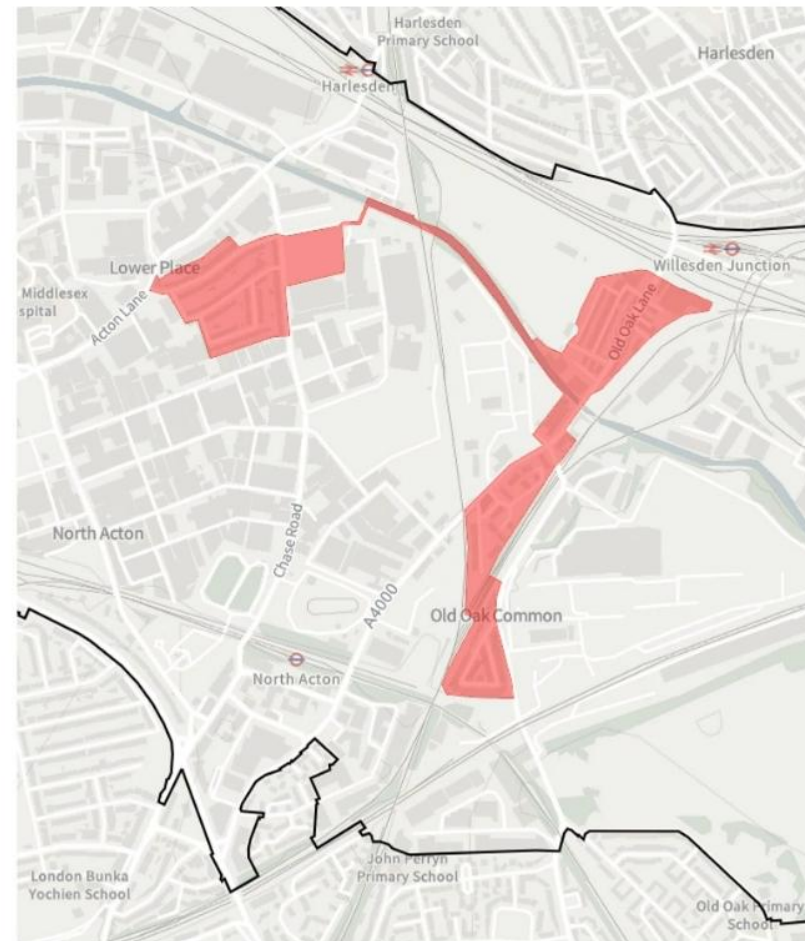
The LPA response is 37 pages, finding fault with virtually every part of the Draft Plan and its policies.

The Delivery team response '*strongly objects*' that the neighbourhood plan *would significantly impact of the deliverability of the scale and of development and regeneration opportunity at Old Oak* (refers to the Masterplan, against which our draft neighbourhood plan will not be assessed by an examiner).

OPDC Consultation response on our Draft Old Oak Neighbourhood Plan

Draft Plan structure and area

- Introduction and context for this neighbourhood plan
- What part could be played by a neighbourhood plan?
- The characteristic of the five sub-areas
- Background to the vision and objectives of the neighbourhood plan
- Ealing's new Local Plan and OPDC Legacy Framework
- Overall vision and objectives for the neighbourhood plan
- Draft policies applying to all sub-areas
 - Chapter 5 Sub-area OONA 1 Wesley Estate
 - Chapter 6 Sub-area OONA 2 Railway Cottage/TITRA area
 - Chapter 7 Sub-area OONA 3 Atlas Junction
 - Chapter 8 Sub-area OONA 4 Midland Terrace and Shaftesbury Gardens
 - Chapter 9 Sub-area OONA 5 Wells House Road
- Annexe A Initial Basic Conditions Statement
- Annexe B OPDC Note on Indicative Housing Requirement



Summary of points

- The plan does not demonstrate how it would **meet OPDC's Indicative Housing Requirement** of a minimum of 510 new homes.
- The plan **does not identify development capacities** proposed for site allocations or consistently provide **clear site boundaries** on maps.
- The plan **applies fixed net residential density limits** and **restrictive height limits** without sufficient **proportionate evidence**.
- The plan **does not explain how its net residential density limits relate to the Local Plan density range**, which was prepared on a gross density basis.
- The plan includes policies and site allocations which may **restrict housing delivery, mixed-use growth and optimisation of development**. However, without knowing the site capacities or having sight of design-led evidence base for sites and policies this cannot be identified until **further information** has been provided.
- The plan includes **policies that duplicate or repeat matters** already addressed in the Local Plan, London Plan or national policy, including re-allocating land that already forms part of a Local Plan site allocation.



Peter Farnham

OPDC's Indicative Housing Target for our NP

We are continuing to challenge OPDC's view that development sites included in Development Capacity Studies should count as 'housing proposed' for the calculation of a housing target.

We have responded to OPDC's recent confirmation that the housing density figures in its Local Plan are all based on **gross** rather than **net** residential densities.

(This has had the effect of **understating** densities against London Plan policies, from Oaklands Rise onwards)

Next steps on the Neighbourhood Plan

We have sent letters/emails to OPDC on six matters on which we question their assertions and comments.

A meeting will be held with OPDC planning officers

We redraft the Plan, taking account of comments where justified

A 'submission version' is then sent to OPDC

Accompanied by a Consultation Statement (27 residents, LBE, LBB, GUA, WARA, GLA, OPDC (2), KAO, Natural England)

And a Basic Conditions Statement (a key document setting out why we think the Draft Plan meets these statutory requirements)

OPDC carry out a second 6 week 'publicity' consultation.

Report of OPDC Audit Committee to Board

This relates to the values of land acquired by OPDC and the extent to which it can be treated as an 'investment' in OPDC accounts:

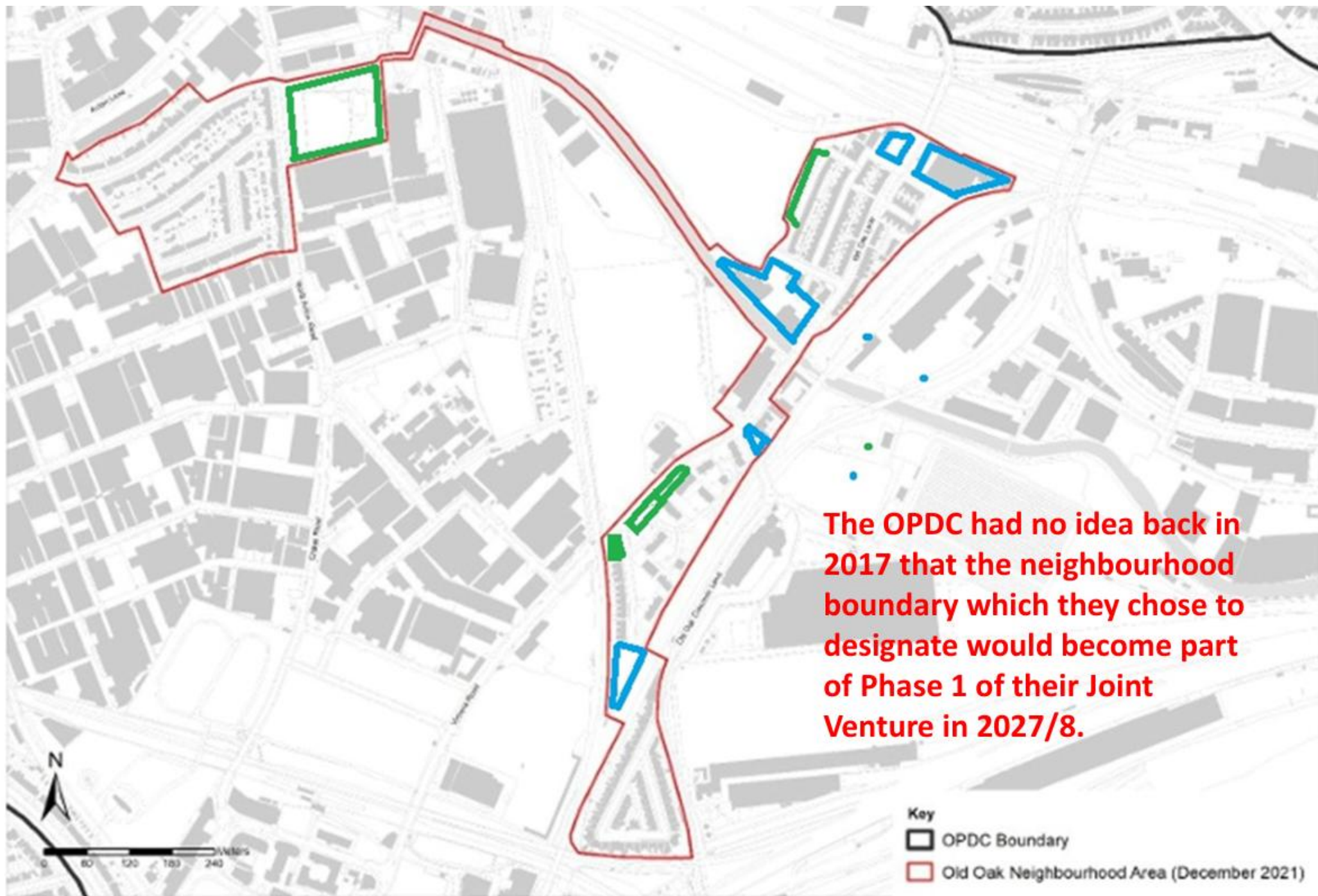
Officers advised that the proposed reclassification could result in a reduction of approximately £16.9m in reported asset values and require prior year restatement of accounts back to 2023/24. Members raised concerns that this issue had not been picked up in previous years.

Early Delivery >>

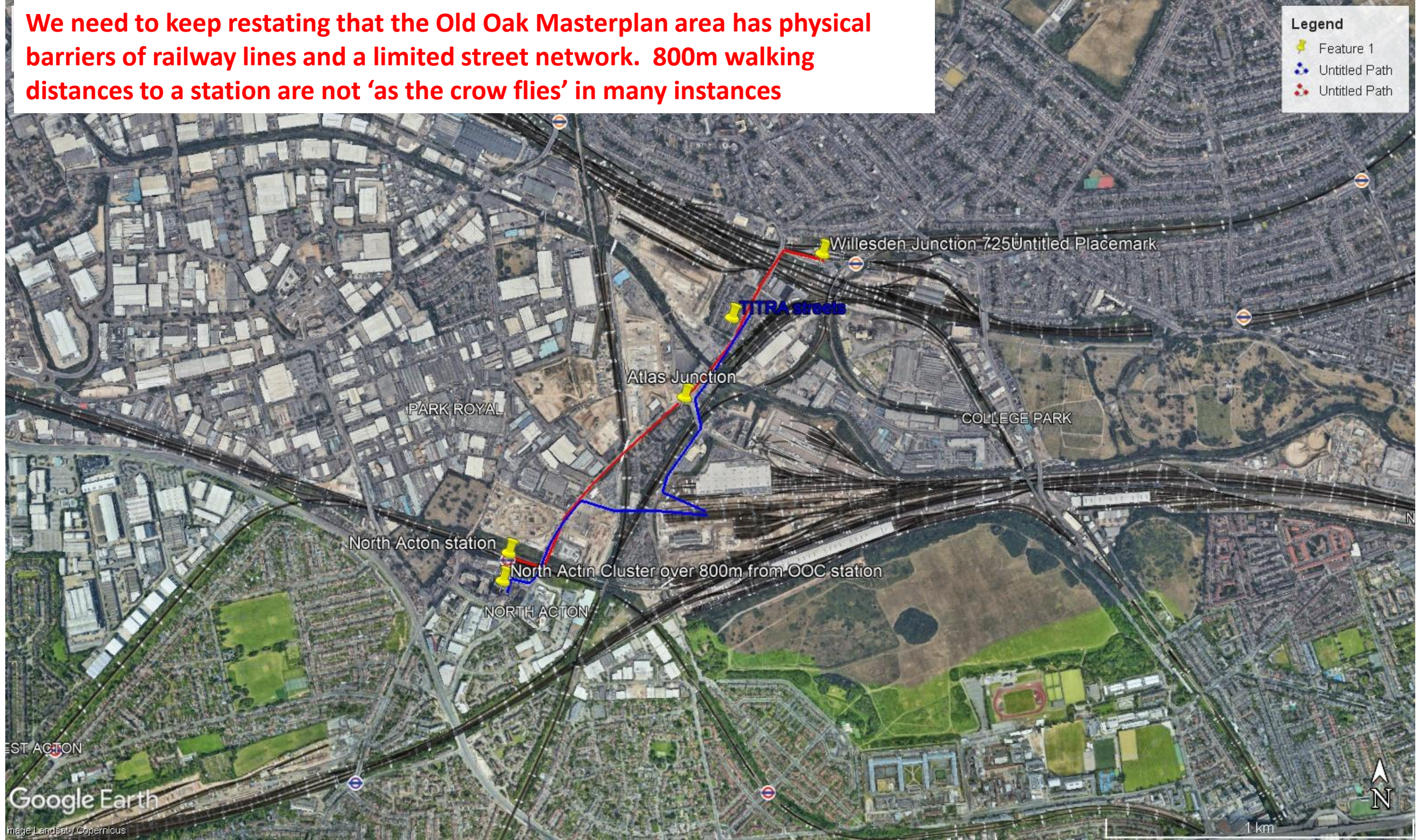


Phase 1 key plan





We need to keep restating that the Old Oak Masterplan area has physical barriers of railway lines and a limited street network. 800m walking distances to a station are not 'as the crow flies' in many instances



Consultation on the West London Orbital

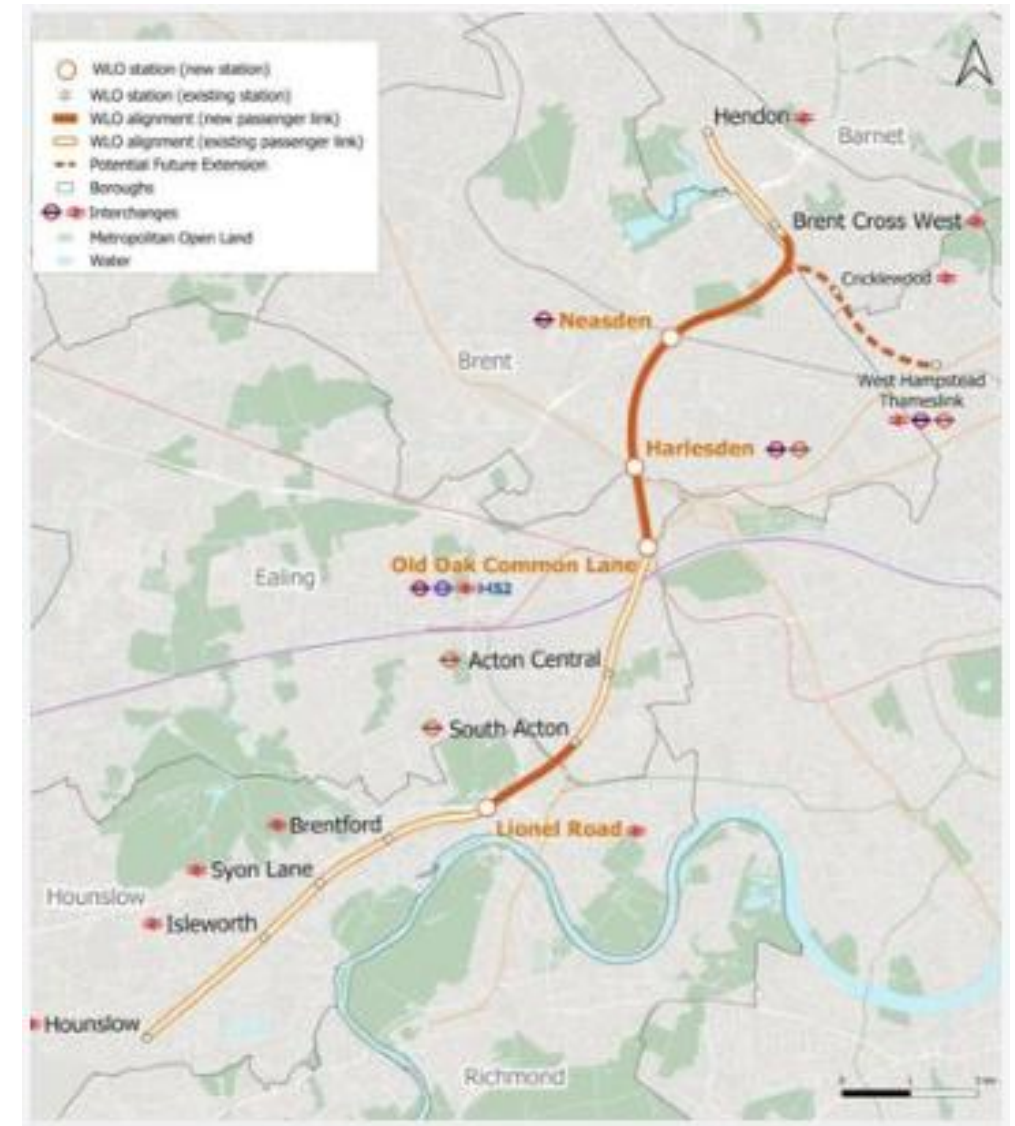
Consultation material at

[West London Orbital - Transport for London](#)

Deadline 18th November

Views of local residents are being discussed on the Old Oak Alliance WhatsApp group.

If this project gets the go ahead and funding agreed first passenger might travel in 2035 (similar to OOC station opening)





Images of models of OPDC area on display at One Portal Way Sociopolis 'meanwhile' building.



News on HS2

- **No evidence** of a pre-Christmas 2026 further announcement on the reset.
- **A 6-monthly report to Parliament is due**, but may surface in **late November or slip into early 2027**.
- Expect **incremental updates** based on May 2026 announcements and not a new baseline.
- The May 2026 cost (£87.7–102.7bn) and schedule (2036–39 / 2040–43 for Euston) remain the authoritative figures.

Date of next meeting?

Tuesday 3rd November or Thursday 5th (Guy Fawkes night)?

Any other business

Contact details for OONF

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