

TOWARDS A NEW LONDON PLAN 2025 CONSULTATION

RESPONSE FROM THE OLD OAK NEIGHBOURHOOD FORUM AND ST QUINTIN AND WOODLANDS NEIGHBOURHOOD FORUM ON THE OLD OAK AND PARK ROYAL OPPORTUNITY AREA

Background

This evidence is submitted from two neighbourhood forums in West London which have been working together since 2015 in response to the plans and decisions of the Old Oak and Park Royal Development Corporation (OPDC). We previously made joint submissions at each stage of preparation of the 2022 OPDC Local Plan.

The StQW NF (covering part of North Kensington) has 380 members. The Old Oak NF (OONF) has 150 members in and around the site where the HS2 rail interchange is being built in North Hammersmith and in the surrounding parts of Acton in LB Ealing.

Executive Summary

This evidence asks that the Mayor and GLA consider the following issues as part of the preparation of the next London Plan. The first set are general and the second specific to the Old Oak and Park Royal Opportunity Area:

- Risks of ‘over-promotion’ of high density ‘transformational’ regeneration in OAs, thereby raising land values and creating financial viability gaps.
- Risks of assuming timely delivery of major new transport infrastructure as part of the above.
- Risks of setting over-ambitious OA housing targets and determining major applications prematurely.

Specific to the Old Oak and Park Royal Opportunity Area

- 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

OONF submitted a [response to the GLA’s 2022 Call for Evidence](#), as part of the Planning for London Programme. This set out the impact of delays and false steps on the preparation of the OPDC Local Plan and questioned the 25,000 housing target set for the old Oak and Park Royal Opportunity Area.

Among the recommendations we made in 2022 were these:

- ***Numeric housing targets for Opportunity Areas should be included only when there has been a significant level of development capacity work, and testing through masterplanning, to ensure the realism and ‘deliverability’ of such targets.***
- ***Targets and policy statements for Opportunity Areas (or areas of intensification/densification) in the London Plan should avoid raising expectations on new public transport infrastructure, until and unless such future commitments have funding assured with a good level of probability of implementation.***

This second set of evidence re-emphasises these views from 2022, especially the second. We think that the past three years have demonstrated their relevance, in relation to the Old Oak and Park Royal OA. As we said then, the basic idea of the HS2/Crossrail/GWR rail interchange as a ‘catalyst’ for a new part of London was over-promoted from 2014 onwards. **The HS2 project has proved to be a disastrous example of infrastructure planning that has led the Development Corporation into tricky waters.**

OPDC’s intended ‘next steps’ involve finalising a masterplan for the area around OOC station and securing a development partner. We see these activities as now being seriously out of sync with an unknown timeline for HS2. As with the experience of OPDC in 2017/8 we also see real risks of public money being wasted by a MDC which chooses to proceed regardless of very changed circumstances.

OPDC currently insists that it must move forwards ‘at pace’. We do not find this reasoning convincing and suggest that the resources for ‘delivery’ available to OPDC (human and financial) might be better applied to other Opportunity Areas in London.

Meanwhile a 10-15 year ‘meanwhile strategy’ for the Old Oak Project area (Old Oak West) could be prepared by the OPDC planning team with increased input from the three Boroughs involved and the local community. **The next London Plan is the vehicle through which this alternative way forward could be refined and put into place.**

Brief background to the Old Oak and Park Royal Opportunity Area

This OA includes parts of the three Boroughs of Ealing, Hammersmith & Fulham and Brent. A Mayoral Development Corporation (the OPDC) has been the responsible planning authority since 2015. The 2016 London Plan set a target of 24,000 new homes

for the area¹. The 2021 London Plan left this target unchanged. The OPDC finally adopted a Local Plan in 2022, four years after its originally intended timetable.

As the footnote below demonstrates, the premise underpinning regeneration at this Opportunity Area has always been the ‘catalyst’ impact of the Old Oak Common rail interchange. This was originally due to open in 2026.

The statement from the Secretary of State for Transport on June 18th 2025 and the subsequent debate in Commons made clear that there will be no updated timeline set for the completion of the HS2 project until late 2025/early 2026. It is accepted that the 2033 date will not be achieved and the further delay (as speculated in the media is anywhere between 2035 and 2039). There are those who argue that the project will never be completed.

The planned Elizabeth Line platforms at Old Oak Common are at present inextricably linked to completion of the interchange. The Secretary of State has agreed to look at the feasibility of these opening before the HS2 lines. If this cannot be done, East Acton North Hammersmith and North Kensington will not have an Elizabeth Line station for a 10-15 year period after the rest of this core part of London’s transport network opened in 2022.

Without OOC station as a piece of ‘strategic transport infrastructure’ the original driver of ‘transformation’ of the Old Oak area disappears into a far-off future.

Hence the context for ‘regeneration’ at Old Oak has changed fundamentally from the 2015 [Opportunity Area Planning Framework](#) which underpinned the direction of travel of the Mayoral Development Corporation at Old Oak. **Local people are not persuaded that this Opportunity Area is yet ready to be categorised as ‘ready to grow’ as proposed in the Pen Portrait published by the GLA as part of this consultation.**

It may be that in the coming months OPDC will make substantive advances on its new ‘masterplan’ for the Old Oak West part of the Opportunity Area. We recognise that real progress has been made by OPDC in the last 2 years and that the Corporation has a new chair and chief executive in place. Relationships with local community organisations are much improved and a new OPDC Residents Panel is due to be established by the OPDC Board on July 10th.

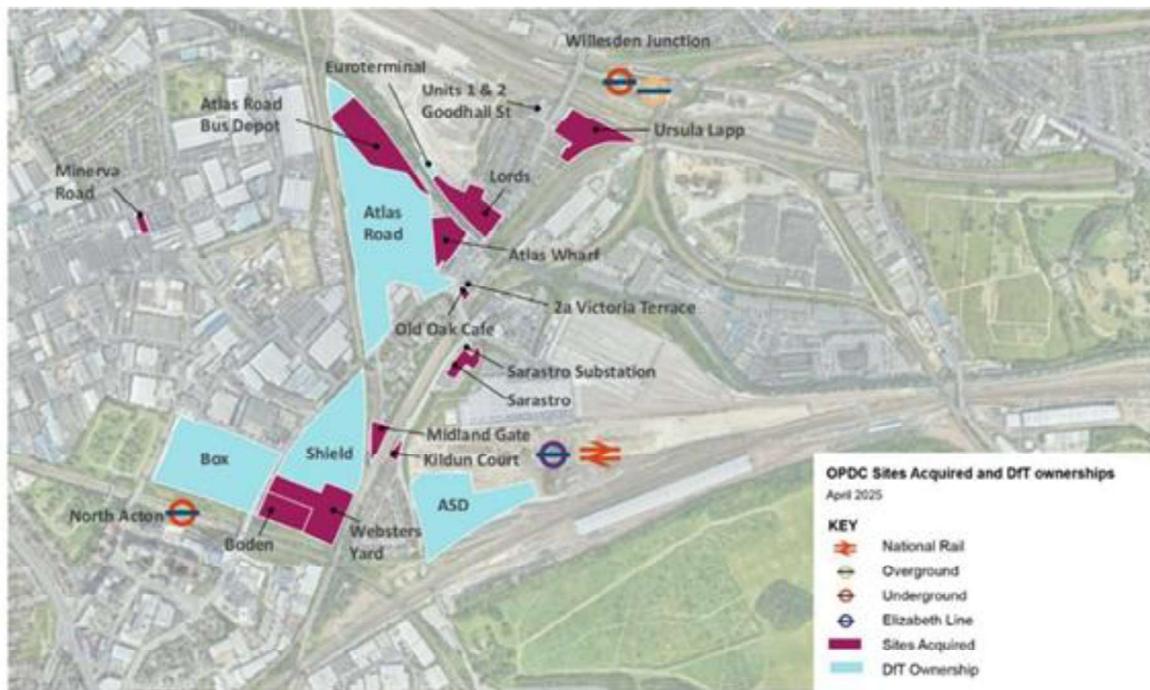
A sizable portfolio of development sites has been assembled, combining those owned by DfT (and in use as HS2 construction compounds) along with a series of former privately owned sites for which OPDC has acquired control (see map below).

At this time (June 2025), it is not entirely clear how OPDC will react to the June 18th statement from the Secretary of State. Officers at the OPDC Planning Committee took

¹ Extract from ANNEX1 to 2016 London Plan *Regeneration would centre on a new strategic public transport infrastructure hub at Old Oak Common on the HS2 line between London, and Birmingham and beyond with an interchange with Crossrail 1, other national main lines and the London Overground. This should include a new branch of Crossrail 1 linking from Old Oak to the West Coast Main Line and extending via Wembley to Watford and potentially beyond.*

the position at its June 18th meeting (on the evening of the Commons debate) that ‘we now control a set of development sites and will be pressing onwards, even if an end date for HS2 is unknown’. This approach was agreed to be recommended to the OPDC Board.

Importantly, it is not clear how London’s development market will react to extended further delays on the opening of Old Oak Common station (delaying also the GWR and Elizabeth lines at this ‘largest rail station built in the UK’). **We worry that developers will henceforth exploit market uncertainties when forming delivery agreements and joint ventures with the OPDC.**



The GLA ‘pen portraits of London’s Opportunity Areas

As part of the consultation material on Towards a London Plan, and using data from the London Datahub, the GLA has published a set of ‘pen portraits’ of the 47 Mayoral Opportunity Areas.

These are helpful material setting out the state of play in each area, accessible to the public. Each ends with a ‘proposition’ on how the area should be classified in the next London Plan, with a set of measures re-used from the 2021 London Plan as below.

The pen portrait proposition for the OPDC OA is for a two level jump from ‘nascent’ to ‘underway’. This is justified ‘as a lot of development sites have been allocated and pre-planning is on-going for approved sites’. While this is true, such activity consists of ‘more plans’ rather than actual development. It remains early days in terms of OPDC securing a master developer and/or several delivery partners. We local residents have not seen the outcome of soft market testing by OPDC’s delivery team of its masterplan. This is said to have been ‘positive’, but by what measures and from whose perspective?

OA status - London Plan 2021

- The OA categorisation in the Key info refers to the London Plan 2021 Figure 2.2 - OAPF process diagram, also shown below:

Figure 2.2 - OAPF process diagram



Residents have a good feel for the local area, with its natural barriers, fragmented residential enclaves, and limited road network. Old Oak West has been battered by a decade of HS2 construction. Basic infrastructure is not in good shape. One of the two main north south routes (Old Oak Common Lane) is required to be closed for up to four years (unless HS2 accept that OOC station will not need to be served by double decker buses).

We can envision the kind of 'transformation' that OPDC proposes, of a high-density mixed use area with a good deal of 'greening.' Our view of the realism of this end result, even in 20 years time, does not correspond with that of the Development Corporation².

A moment for a pause and a review as part of London Plan preparation?

We suggest that this would be a timely moment for a tightly focused second review of OPDC plans before the relevant section of a New Draft London Plan is finalised. The Mayor has a statutory duty to review MDCs from time to time. The only previous review was in late 2016, now 9 years ago and in very different circumstances.

The OPDC in 2024 commissioned an Effectiveness Review of its governance arrangements. The recommendations from this are being implemented, so a second review need not cover these issues. It could however address the following questions:

- How important is HS2 now seen in generating 'transformation' at Old Oak?

² The complex institutional dynamic around a MDC and its impact on the early years of 'regeneration' at Old Oak has been the subject of academic study. See the work of [Jenny Robinson and Katya Attuyer](#) including *Contesting density: beyond nimby-ism and usual suspects in governing the future city*, Urban Geography, DOI:10.1080/02723638.2020.1860623

- Given an indefinite HS2 timeline, will there be sufficient investment interest in OPDC's masterplan at the stage of procurement of a development partner in 2025?
- What is the case for proceeding 'at pace' (as is the stated intention of the OPDC delivery team?)
- How important is the opening of Elizabeth Line platforms and can this be achieved separately from the HS2 project?
- Is 2025-35 the right decade to seek to progress the masterplan? Are there grounds for a 'pause' coupled with extensive 'meanwhile' uses?
- Is the 2016 target of 25,000 new homes still realistic and appropriate? (we are not questioning the employment target. Over 450ha of Old Oak and Park Royal remains designated as SIL).
- What is the position on electricity supply and TWA capacity (water/sewage) to meet the requirements of high density commercial and housing development at Old Oak West?
- Is a category change from 'nascent' to 'underway' justified for the area, in the next London Plan?
- Is there a risk (as has happened at HS2³) that a political and institutional wish to maintain perceived 'momentum' at Old Oak may override good decision-making?
- Who will ensure that joint ventures or development agreements, involving a balance of risk and reward between OPDC/GLA and developer(s) are fully in the public interest (i.e. not being too heavily subsidised from the public purse in the interests of 'delivery at pace'?)

For the past decade it has been very much in the institutional interests of HS2, coupled with OPDC, to talk up the impact of Old Oak Common station. The claims made have not changed since the truncation of the HS2 project in October 2023. Only very recently has HS2's language of '*unrivalled connectivity of a rail superhub*' been toned down to '*one of the UK's most important transport hubs*'.

We comment in our case study on North Acton, on HS2's levels of 'hype' for Old Oak. These extend to the recent series of promotional videos following HS2's '*From Cranes to Trains*' session for developers held in March 2025. This event promoted the onset of a '*£10bn development boom*' at Old Oak/North Acton. Was the staging of this conference a core activity on which HS2 should have been spending time and money?⁴

Local people agree that there are parts of West London that are seeing something of a development boom. Hammersmith's White City Opportunity Area and its 'Innovation

³ James Stewart comments in his Review *I have found many examples of key decisions having been driven by schedule rather than cost, i.e. the Phase 1 Hybrid Bill² and letting of Stage 2 of the MWCCs. I have heard a range of reasons for this but pressure from politicians to maintain momentum, fear of HS2 being cancelled, and the belief that costs will increase as a result of delay have featured strongly.*

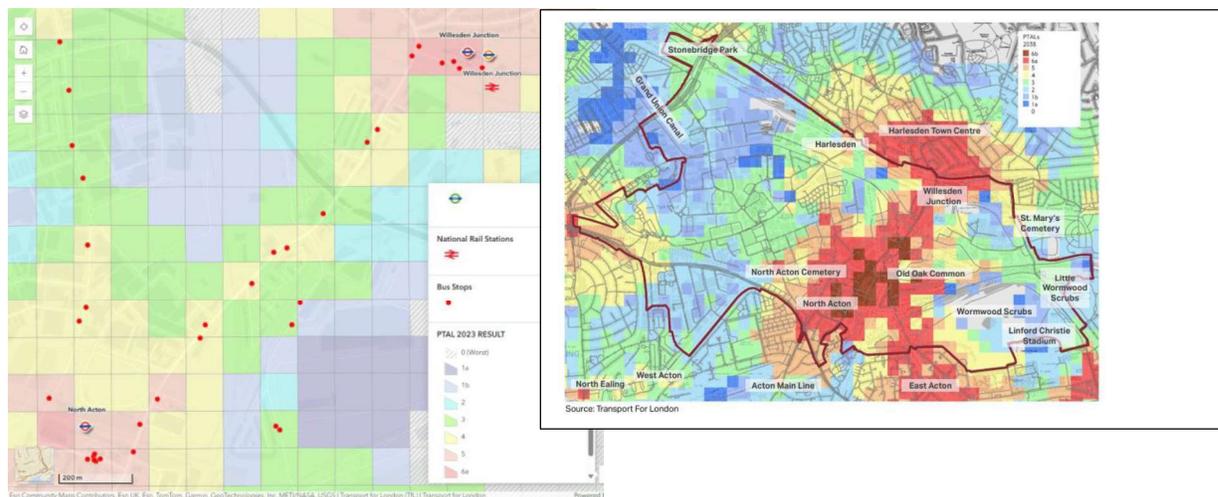
⁴ In his 31st March letter to the Secretary of State, now published, Mark Wild says *I am stopping all activity that does not solely support the reset, in year productivity or essential controls.*

District' is doing well on housing delivery, even if the density of the tall building cluster is anathema to many Londoners. On GLA metrics, this OA warrants the 'proposition' of a move upwards from 'ready to grow' to the category of 'underway'. Neighbouring Kensal Canalside OA meanwhile remains classed as 'nascent' because it lacks key pieces of transport infrastructure.

A quick external review of the realism of OPDC ambitions would give assurance to local people (and to the three Borough Councils) that the Opportunity Area is indeed now 'underway' rather than 'nascent' or 'ready to grow'. The 2016 review was carried out by a then GLA Director. An independent exercise would give more confidence to all stakeholders and to the public that the GLA is not marking its own homework.

From a local perspective, this part of East Acton has been battered by a decade of construction activity by HS2. The area retains all the features which have always hampered development (a limited road network, physical barriers of the Grand Union Canal and rail tracks, plus poor access to public transport). The gulf between the present day and the 'transformed' Old Oak (as shown in OPDC visuals) is that stretches credulity for many local people.

The reality of accessibility to public transport at Old Oak is at present poor. The maps below show current PTAL levels in the Old Oak project area alongside that from the GLA 'pen portrait' for the OPDC area. The latter is undated (unlike those in other 'portraits') and must reflect several assumptions on new transport connections. These are not explained. They may well include the potential opening of the West London Orbital and a new Overground at Old Oak Common Lane as well as OOC station itself. These first two projects are unfunded. **In 2025 Old Oak West is a 'well connected place' only as an aspiration, for an increasingly distant future.**



The left hand image shows current PTAL levels around the OOC station site (from Willesden Junction to North Acton station) and is taken from the TfL WebCat model. These PTAL levels are 2 and 3 apart from 4 around these existing stations. The right hand image is from the new GLA 'pen portrait' of the OA. This gives no 'forecast date' nor information on what assumptions are involved. There are no funded plans for new stations (other than OOC station) and this image reflects a possible scenario in the 2040s. Old Oak West is not an area ready for early high-density development.

when the timeline for OOC station and Elizabeth Line connections is unknown. Is OOC station still seen as critical to regeneration at Old Oak, or is it not an essential after all?

Discussion at the OPDC June 19th OPDC Planning Committee barely posed this question. If it goes unanswered, leaving developers to make up their own minds, what level of risk will the private sector be willing to commit to in 2026 and what level of future reward will be sought?



There are 46 other Opportunity Areas in London, for which London Plan policies of ‘intensification’ encourage high density homebuilding. During the next London Plan period, several of these OAs may prove to be better placed than Old Oak to make use of the new £39bn Affordable Housing Programme announced in the Spending Review, or from other sources of infrastructure funding for London.

Opportunity Areas in West London include several where regeneration prospects rest on Elizabeth Line stations already in operation (Hayes OA) or which are already well served by public transport (Harrow and Wealdstone OA). The West London Orbital is a high priority prospect for funding and would boost development at several OAs (as well as at Old Oak). With a newly opened mainline station in place, Brent Cross Cricklewood OA has a good case for its proposed elevation from ‘*ready to grow*’ to ‘*underway*’. What hopes for a Government change of heart on the DLR extension?

In terms of ‘connectivity’ in the OPDC area, we believe that few Londoners yet realise that there is no planned road access to the eastern end of the 1km long £1.7bn Old Oak Common interchange (i.e. that nearest to central London). This applies to buses and taxis as well as private cars. The sole planned connection at this location (Wood Lane/Scrubs Lane in North Hammersmith) is a ped/cycle ramp and bridge, accessed via the Grand Union canal path – a walk now dominated by cyclists at commuting hours.

Even when complete, the Old Oak Common ‘superhub’ will not connect well into the West London road network, the sole road access being at Old Oak Common Lane.

On delivery of new homes, the OPDC OA has a pipeline of **7,852** new homes. This is a far larger figure than the **2,854** delivered to date. The OPDC Local Plan and its site allocations are premised on development capacity studies which appear to work backwards from an original target of 25,500 new homes (with 24,000 of these to be in the Old Oak half of the overall Opportunity Area).

Is a double jump from a ‘nascent’ Opportunity Area to one that is ‘underway’ justified at this time? We think not, when essential transport infrastructure has no firm timeline. The context should be more certain by the time a 2032 London Plan is prepared. What is gained in the meantime by creating a false picture of Old Oak in the next five years?

Old Oak/Park Royal Delivery of homes

Delivery pre-2019 Completions since designation against capacity

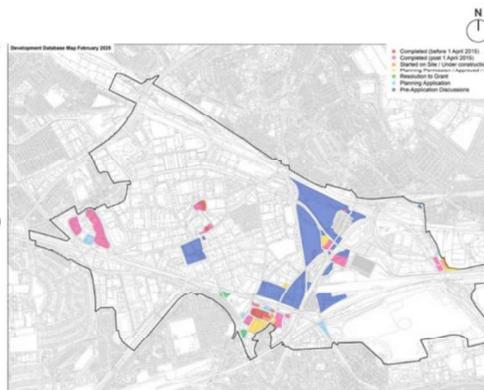
LP 2004	300
LP 2008	500
LP 2016	25,500
Completed	2,043

OPDC was established in 2015, and between then and 2019, 1,453 homes have been completed.

Delivery post - 2019 (OPDC Local Plan 2022) Progress against 22yr, 10 yr capacity

22 yr	25,500
10 yr	13,992
Completed	2,854
Pipeline	7,852

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.



Housing capacity at Old Oak

In responses to the Regulation 18 and 19 Draft OPDC Local Plans, and during the Examination in Public, our two neighbourhood forums argued that the 25,000 figure was never adequately researched. It appears to have flowed from comparisons with Vauxhall/Nine Elms/Battersea, as an OA of broadly similar scale and characteristics as the OPDC area. We made the same case in the [OONF 2022 evidence](#) during the *Planning for London programme*.

To allow for 25,000 homes, a 2017 study by UC Berkeley and Cambridge University⁵ concluded that *average* net housing densities of 550 units/hectare would be required, given site availability. And that such average densities were more akin to Shanghai and Hong Kong than in London.

Dismissed by OPDC at the time as ‘student work’, we have yet to see from OPDC any up to date forecast of expected net housing density at Old Oak in 20-30 years time. The OPDC Local Plan includes no policy on density. Nor are expected density figures provided in the Plan’s table of site allocations. Average net densities of 600

⁵ Old Oak Common, London ‘Fundamental Questions’ at [old_oak_common_1.pdf](#)

units/hectare are envisaged in several of the 'Places' that make up the 2022 Local Plan. In terms of individual applications consented and built to date, these range from 400-500 dph in Scrubs Lane to 2,121dph at North Acton.

We argue that the 25,000 housing target has been 'tested' over the past decade. It has resulted in consents to car-free very high density developments which fail basic GLA policies in Good Growth. These proposals were taken through the planning system on the promise of rail based public transport access which has not materialised as expected, and has disappeared into the future (see the Oaklands Rise example below).



A further image in the GLA pen portrait is shown above, including a Vu City model of development activity up to 2024. The only concentrations of new buildings completed/consented to date are at the 'North Acton Cluster' in the centre of the map, and a smaller cluster of tall buildings at Mitre Bridge in Scrubs Lane NW10.

In a 'Note' added to the map, OPDC officers have corrected several mistaken assumptions suggesting that consented schemes have been 'completed'. In the current state of the London market, there are doubts whether three major mixed use schemes at North Acton will start on site or will instead join the estimated 250,000-300,000 housing units in London consented but not built out.⁶

None of this background is mentioned in the GLA pen portrait, which we see as giving a misleading impression to Londoners of the state of play at Old Oak. **We suggest that**

⁶ <https://www.onlondon.co.uk/ten-big-reasons-why-not-enough-homes-are-being-built-in-london/>

this OA should continue to be considered as ‘nascent’ at this time. A higher category may be justified by 2026 when a full Draft London Plan emerges.

We also argue **that the 24,000 housing target for the Old Oak half of the OPDC area should be suspended and justified afresh, in the new London Plan. Adaptive targets are needed for the next 10 and 20 years, reflecting any further delays on Old Oak Common station.** These should be set once more up to date supporting evidence is available, and the feasibility explored of opening the Elizabeth Line platforms at OOC. A key document awaited is an updated OPDC Strategic Transport Study (not republished since 2015). We assume that this will include forecasts of passengers on the truncated HS2 line and on the Elizabeth Line and GWR. HS2 have continued to claim that 250,000 passengers a day will pass through OOC station a figure unchanged from 2015.

We believe a two decade target of around 18,000 new homes will prove to be the highest level for the Old Oak part of the OA that is compatible with London Plan and Mayoral policies on Good Growth – particularly if London Plan and OPDC Local Plan policies on modal transport shifts and car-free development are to continue to be applied.

Assuming that a time horizon is clarified in the next 6-9 months (which may extend into the 2040s) we also suggest that a comprehensive meanwhile strategy be prepared for much of the OPDC/TfL land portfolio. Until such time as new transport infrastructure (other than OOC station) is funded and within a year or two of delivery, is there scope for low-rise modular housing built for a 10-15 year period? In this way, OPDC’s hypothesis for the best location of a major town centre at Old Oak⁷, along with the integration of existing residential enclaves, could be tested in more evolutionary and real life settings.

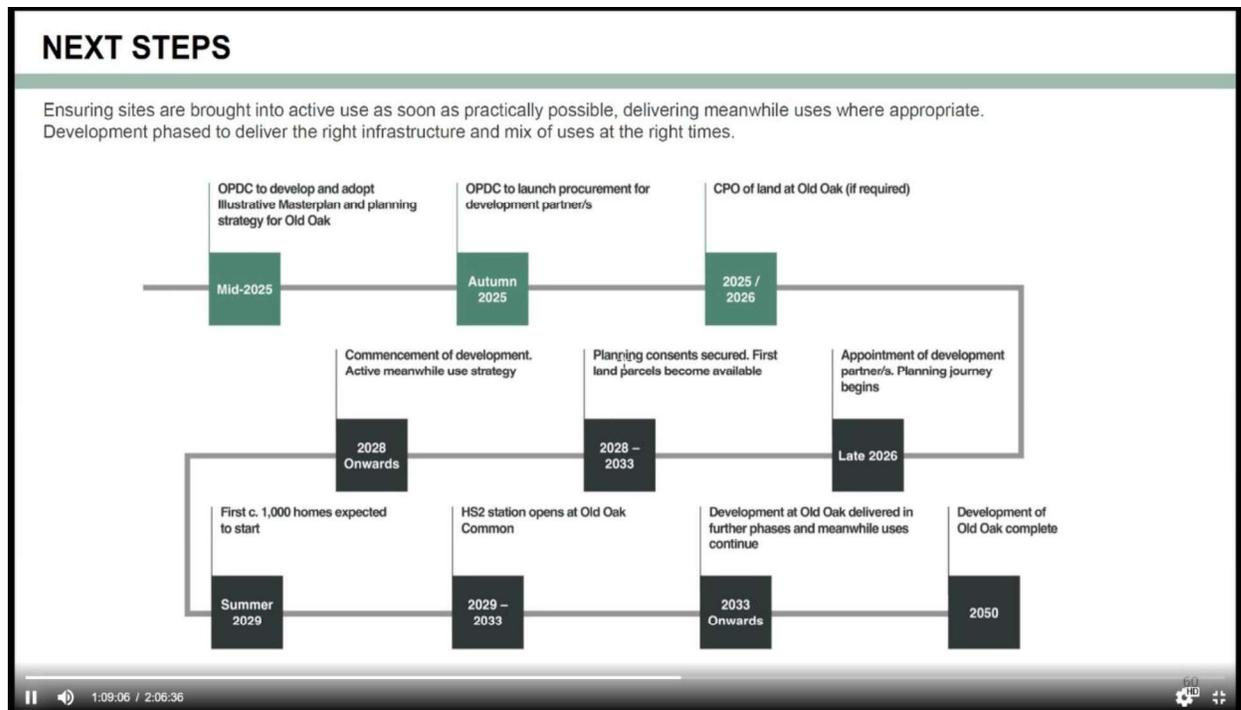
OPDC’s next steps

As commented on above, OPDC’s Planning Committee on June 19th received a detailed presentation on the masterplan prepared by the Corporation’s delivery team. This masterplan has been the subject of a series of pre-application discussions with the Corporation’s planning team, with the latter team exercising the OPDC’s role as a London LPA under a protocol designed to ensure separation of functions.

The planning team have identified a number of ‘deviations’ in the masterplan where it does not conform with the adopted 2022 Local Plan. The officer report assured the committee that, taken as a whole, the masterplan is likely to accord with the OPDC 2022 Local Plan and 2024 SPD for Old Oak West. Such reassurance is important for the next steps by OPDC’s delivery team to secure a development partner.

OPDC Board on July 10th will receive a similar report and presentation. The OPDC see next steps as per the presentation slide overleaf.

⁷ OPDC’s Local Plan, Old Oak West, and now the new Masterplan all show varying locations for a proposed ‘major town centre/commercial centre’.



Slide from June 19th masterplan presentation to OPDC Planning Committee. Note the stated 2029/33 opening date for OOC station, outdated by the time of this slide's first public outing.

One potential policy 'deviation' which was neither reported on nor discussed is that of car-free residential development. OPDC Local Plan Transport Policy T4 reads a) *OPDC will ensure that Old Oak and Park Royal will promote a modal shift towards more sustainable modes and becomes an exemplar of low carbon development, by: i) limiting car parking for residential development to a maximum of 0.2 spaces per residential unit; ii) requiring car-free development for residential developments located in existing planned areas with PTAL between 4 and 6B;*

As noted above, it is hard to see how this important policy can be adhered to given the existing PTAL levels in the Old Oak Project area. The densities implied in the Old Oak masterplan could not be delivered on current PTAL levels.

This dichotomy arose with the first major project to be consented by OPDC in July 2016, a 605 housing unit development at Oaklands Rise for Notting Hill Genesis. A car-free approach on a PTAL 2 site approach was deemed acceptable by the OPDC Planning Committee on the basis of the forthcoming OOC station.

The committee report commented that *This exceptional access to rail, coupled with a future local bus strategy as identified in the OPDC Regulation 18 Local Plan, ensure that this site would have the highest possible Public Transport Accessibility Level as one of the most accessible brownfield sites in London.* This justification cannot continue to be re-used for the next decade. As the new pen portraits show, many OAs involve brownfield land which is much more accessible.

Once developments are occupied, car users who park without a permit became a huge problem for the nearby existing residential areas. OPDC is not a Highways Authority and LB Ealing were left to sort out the consequences around Oaklands Rise.

Conclusions

The damage caused by an over-inflated housing target for the OPDC OA target is already present, we believe. Since 2015 the density of each and every site which has come forward in the Old Oak area has reflected land values that jumped in response to the 2014/15 Mayoral 'vision' of a new district round a 'rail superhub'. These land values bear no relation to the level of development envisaged for this part of Ealing Borough in its own 2012/13 Local Plan (still in force).

The Opportunity Area has seen a series of planning consents for individual very high-density/high-rise housing schemes (several of which have been combined with Purpose Built Student Accommodation and co-living units). Inflated site values have led developers to demand heights and densities dictated by financial viability considerations.

Too much has been paid by private developers for site acquisitions (including major sites with extant or lapsed consents being 'flipped' at North Acton and Scrubs Lane). We can only hope that the OPDC has not overpaid for its recent site acquisitions at Old Oak West. Ever since 2015, the constant mantra that Old Oak will have '*unrivalled connectivity*' has not been helpful to anyone.

What has been built to date is not proving to be '*the right development in the right place*'. Continuation via the proposed OPDC masterplan needs to be questioned and externally assessed before OPDC proceed to the stage of master developer procurement and a CPO order.

OPDC's insistence on proceeding 'at pace' is reminiscent of the 2017/18 period that led to decisions of the Planning Inspector to intervene on the Draft Local Plan and subsequent shift from Old Oak North and Cargiant's own masterplan for Old Oak Park. This caused at least 2 years of delay on local plan adoption and cost Londoners £6.16m in abortive supplier costs met by OPDC on suppliers and consultancy fees⁸.

It is no fault of OPDC that HS2 Ltd has failed so comprehensively in its task. But some sort of independent reality check is now needed on the implications for OPDC's overall strategy and 'next steps'.

The next London Plan needs to set an updated, clear and realistic way forward for the OPDC Opportunity Area, following a swift and tightly defined review of the OPDC's plans and work programme.

⁸ See [addendum report](#) to OPDC Audit Committee 2nd March 2020

Will the MDC model prove the best way forward for the next decade of regeneration at Old Oak? Is there a case for a pause, for a wider 'meanwhile' approach, and/or for strengthened involvement by the three Boroughs in next steps?

Separate to this response, we have prepared a detailed **case study on North Acton**. This is an example of a part of London which largely fell out of London's planning system, for unique and unforeseen reasons, in a critical period from 2015 to 2021. The outcome, as perceived by those living in and around North Acton, is one of London's least successful examples of urban renewal. We think that we are not alone in this assessment.

Old Oak Neighbourhood Forum
St Quintin and Woodlands Neighbourhood Forum
June 2025

NORTH ACTON – A CASE STUDY OF URBAN RENEWAL IN A LONDON OPPORTUNITY AREA

This case study has been prepared by the Old Oak Neighbourhood Forum⁹, as part of the Forum's response to the 2025 Mayoral document *Towards a London Plan*.

Our separate main submission assesses the progress made in the Old Oak and Park Royal Opportunity Area. This is one of London's largest OA's and has been managed since April 2015 by the Old Oak and Park Royal Development Corporation.

North Acton is one small part of the 655ha Opportunity Area, lying in the Ealing part of the OA. It is a location where 'regeneration' was already underway in 2015, with LB Ealing having granted planning consents to a number of high density mixed use schemes along with several towers of Purpose Built Student Accommodation (PBSA).

In 2025, the 'North Acton Cluster' has become visible for miles on the outskirts of West London. This case study explores how this came about. **The perspective of our neighbourhood forum is that North Acton represents one of London's least successful examples of urban renewal.** As compared with Kings Cross and development in many other OAs, North Acton reflects what can happen if development is not 'plan-led' and without any form of masterplan framework.

As set out below, a unique combination of circumstances has meant that North Acton effectively fell out of London's planning system for a critical period during which its fate was sealed. This sequence of events has implications for the next London Plan and for any future MDCs in London.

The main factors that have led up to the 2025 context of an 'unplanned' North Acton, are as follows:

- Ealing as a London Borough has been one of the slowest in reviewing and updating its Local Plan (adopted in 2012/13). Only now (June 2025) is a new Draft Plan at Examination stage.
- In the run-up to the establishment of a MDC for Old Oak, a political deal between the then Leader of Ealing and the Mayor of London led to an agreement that the Borough would retain control of major planning decisions at North Acton.
- At its first meeting in 2015, OPDC adopted a 'Scheme of Delegation' under which this arrangement was confirmed. Ealing continued to determine all major applications at North Acton including several very tall residential towers, unprecedented in West London.
- In 2021 OPDC to resume responsibility for deciding selected 'strategic' applications at North Acton.
- A further factor has been the recommendations to the Mayor by the GLA Planning Decisions Unit that these major schemes were policy compliant at Stages 1 and 2,

⁹ The Old Oak Neighbourhood Forum (OONF) is a body designated by OPDC in 2017 and re-designated in 2023. The Forum brings together a number of residents groups in the Old Oak Area and has been working with the Grand Union Alliance since 2014 in seeking to influence the actions and decisions of OPDC and HS2 in achieving 'Good Growth' for the local area.

during a period when Ealing's Local Plan was out of date and the OPDC Draft Local Plan remained 'emerging policy' and was proving very slow to emerge.

- Over the last 10 years, North Acton has not been an area of priority interest for OPDC. The Corporation focused from 2015-19 on 'Old Oak North' (the Cargiant land) and subsequently on the potential development sites owned by DfT at 'Old Oak West'.



North Acton in its initial 'regeneration' stage with LBE as planning authority granting a series of consents for student housing

The fate of North Acton, in terms of its building typology and urban fabric is now largely sealed, albeit with uncertainty over whether some of the larger consented schemes will be built out. Both LB Ealing and OPDC acknowledge that the 'public realm' of the area is poor and a joint OPDC/LBE programme group is working to make improvements.

Meanwhile Ealing has been consulting its citizens on how further development should emerge in the Borough's 'Seven Towns', as part of preparation of a new Local Plan. As a large London Borough which for many decades viewed itself as the 'Queen of the Suburbs', the level of change to Ealing has been substantial. Opposition from residents to the introduction of residential towers at a series of locations across the Borough has been sustained and vociferous¹⁰.

During these years of local debate on the future of the Borough, North Acton has not featured significantly. The area appears in Ealing's new Draft Local Plan only as a blank space on the Policy Map. At the EIP hearings on the Local Plan, North Acton is not being discussed.

Why does recent history at North Acton have implications for the New London Plan?

¹⁰ See at [Stop The Towers in West Ealing](#), [Ealing Matters – A borough-wide alliance of residents' groups](#), and [Ealing Civic Society – Working to preserve and improve our borough](#)

Our concern is that the whole concept of Opportunity Areas can prove counterproductive in some contexts. The Olympic Legacy OA and the work of the LLDC is generally viewed as a success, and as a ‘maturing’ OA which has achieved high results on housing delivery while some ‘severance’ issues remain¹¹.

By contrast we see the OPDC Opportunity Area as having much more mixed results, and with North Acton as exemplifying the worst of these. **Might North Acton be a ‘better place’ today if OA designation and the creation of a MDC had never happened?** Can a part of London become a victim of over-ambitious ‘visions’ and associated interventions that vary the normal workings of the London planning system?

We think the question is at least worth asking at this early stage on a new London Plan.

London Plan policies are designed to open up prospects for ‘intensification’ and higher housing densities. Densities which have become ‘normal’ in OAs across London bear no relation to the principles behind the former London Plan Density Matrix and its 405 units/ha maximum net density for the most central sites best served by public transport. This level was itself a product of ‘Compact City’ thinking, with many urbanists and architects viewing densities around 300-350 units/ha as a more sustainable level.

Debate continues on density and how it should be approached in inner and outer London. Public objections to very tall buildings continue to be voiced but are largely ignored at decision time on applications. London Plan Policy D9 on Tall Buildings has proved to have little impact in meeting the stated objective of ‘gentle density’ behind the Secretary of State’s Direction in 2020, when added to the London Plan. Consented schemes at North Acton include two with net residential densities above 1,200 units/ha.

In recent years, of far greater impact on what is actually being built in London have been mandated second staircases and the Building Safety Act Gateway requirements, coupled with rising construction costs and borrowing rates. Major projects that are stalling on financial viability grounds have become a new threat to London’s regeneration areas.

Looking at the overall picture given by the new GLA ‘pen portraits’ of London’s 47 Opportunity Areas, we see some dangers in the way that ‘regeneration’ prospects can be ‘hyped’ by self-interested players. The signs of this happening at North Acton have been:

- A jump in land values which is not based on anything substantive
- Developers overpaying for sites and then pushing for extreme densities and building heights,
- A LPA willing to grant consents by stretching outdated local plan policies to their limits.
- A MDC tacitly accepting that such decisions were helpful in demonstrating ‘momentum’ on housing numbers in a period when little development activity was emerging elsewhere in the Opportunity Area.

The downsides have been:

- The creation of a North Acton ‘cluster’ for which neither the Borough nor the OPDC now accepts full responsibility.

¹¹ [Opportunity Area Pen Portraits - London Datastore](#)

- Buyers and renters moving into an area only to find that their living environment does not reflect the marketing materials on which they made their choice – particularly in relation to over-promised transport connections.

This last form adverse impact is not of concern to developers. But it contributes to lack of public trust and confidence in the planning system.

The history of development at North Acton, we suggest, is evidence of these factors and their undesirable outcomes. While the Ealing /OPDC interface has been unusual, there are lessons which should be learned for other Opportunity Areas on the outcome of the lack of a clear masterplan and blurred oversight of planning decisions.

The 2012 – 2015 period at North Acton

The text in the 2013 LBE Development Sites DPD gave no indication that a new very high-density/high-rise part of London was being planned for North Acton. The Development Sites DPD noted that the location was deemed *capable of providing a new vibrant mixed use area that accommodates residential and employment space that can benefit from its good access to public transport and the strategic road network*. Also that *the area as a whole suffers from poor public realm with very limited amenity space. Recently completed tall buildings containing residential flats and student accommodation are clustered around North Acton Station*.

OISI Park Royal Southern Gateway Park Royal W3



Site Area: 9.96ha

Ownership: Private

Current Use: Mixed use including residential, student accommodation, hotel, offices, commercial and industrial

Development Strategy Policies: 3.4

Setting: Urban

PTAL: 4-6

Planning Designations:

Park Royal Opportunity Area

SIL (Part - Perfume Factory)

Green Corridor

Adjacent to SINC

Relevant Planning Applications: P/2011/4250, P/2012/2339

LB Ealing's Planning Committee was the sole decision-maker on these schemes up until 2015. The 2015 Opportunity Area Planning Framework prepared by the GLA noted at paragraph 3.1 *Today Old Oak and Park Royal is predominantly Strategic Industrial Location (SIL) and Land for Transport Functions. There are pockets of residential along Old Oak Lane, Scrubs Lane, at North Acton, the First Central site and around the Heart of Park Royal. There is an increasing mix of Town Centre uses at North Acton and some smaller scale 'walk-to' services across the area*

The 'vision' put forward in this OAPF was that *Future development at North Acton will continue to progress along the same lines as the recent successfully completed regeneration in this area*. At that time 'recently completed regeneration' involved a high proportion of student accommodation and some residential towers tall buildings in the 20 storey range.

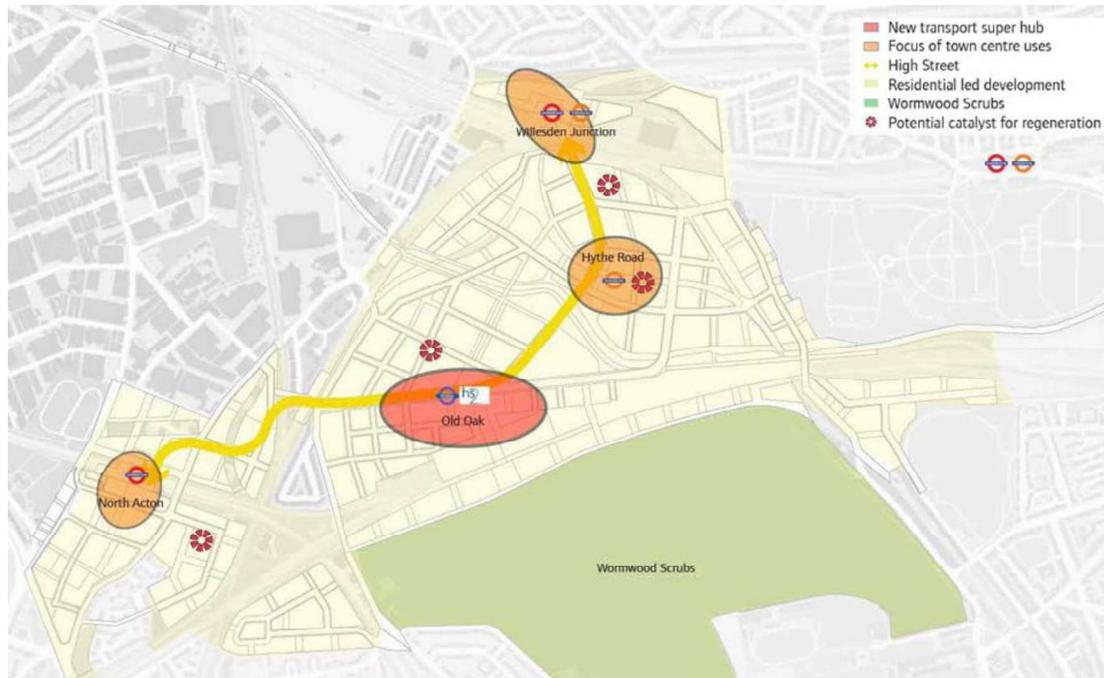


Diagram from the 2015 GLA Opportunity Area Planning Framework including the proposed HS2 rail interchange

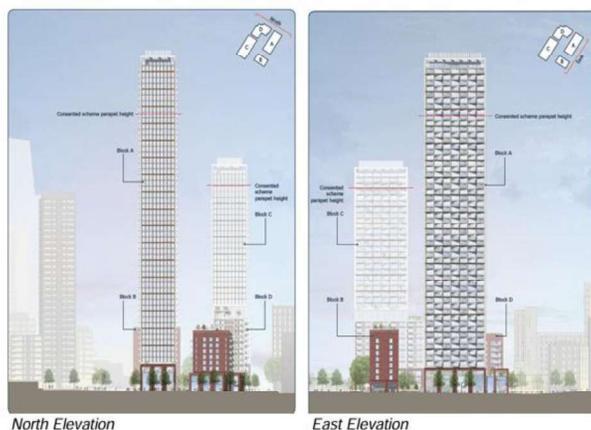
Ealing's Planning Committee in these years lost its statutory planning responsibility for North Acton, but in practice continued to determine all planning applications under the OPDC Scheme of Delegation. Queries by OONF and the StQW NF about operation of this delegation scheme (for which we could find no precedents, between two LPAs) led eventually to some changes in the 'scheme'. These included greater OPDC oversight of the initial decision to delegate and closer involvement of OPDC officers in pre-application discussions and S106 negotiations.

Discussions at Ealing's Planning Committee during these six years reflected a view from councillors that *'we go on as before, in this part of our Borough'*. Ealing's Leader referred to the delegation scheme as *'our get out clause'*. Participation in OPDC's plan-making was limited. Officer reports on applications referred instead to policies in the Ealing 2012/13 development plan, with little regard to what was emerging in an OPDC Local Plan at Regulation 18 and 19 stages.

Decisions on two applications at Ealing's Planning Committee on February 19th 2020 are examples of how North Acton had fallen into a gap in London's planning system, with blurred accountability to citizens and no clear policy framework for determining what were very major applications.

- Application 192957OPDFUL involved the addition of 10 storeys to a previously consented 44 storey at **6 Portal Way**, already under construction. This development is now known as One West Point. The report to the committee was prepared by an external consultant rather than a LBE officer. Policy justification rested largely on Ealing's 2013 Development Sites DPD. There was reference to the 2015 OAPF and to aspirations for a (mis-named) Old Oak Common Opportunity Area, but not to OPDC's Draft Local Plan (still at Examination stage). No OPDC officer attended the committee deciding the application. The first part of the report set out how S106 contributions

would increase from £2.6m to £3.1m, a subject on which LBE councillors showed interest.



- A second application 191854OPDFUL was decided at the same meeting. This was to redevelop the site of the Holiday Inn at 4 Portal Way for two linked buildings of 45 and 55 storeys including up to 702 residential units. Policy justification was similar to that stated for 4 Portal Way. S106 contributions totalling £4.85m were listed (accruing to Ealing rather than OPDC). This scheme was consented by Ealing with the consent subsequently lapsing.

These two planning consents set the bar for high rise developments at North Acton and the culmination of a significant new ‘cluster’ in London. They were followed by Imperial College’s proposed seven building development at One Portal Way (see further below). Other major schemes consented under OPDC’s delegation arrangement with LBE are listed at Annexe 1 to this case study.

The site at 4 Portal Way was subsequently sold on to Aldau Developments. A revised application, including reinstated hotel content and with adjoining towers at ground-plus 43 and ground-plus 57 storeys was consented by the OPDC Planning Committee on 10th October 2024.

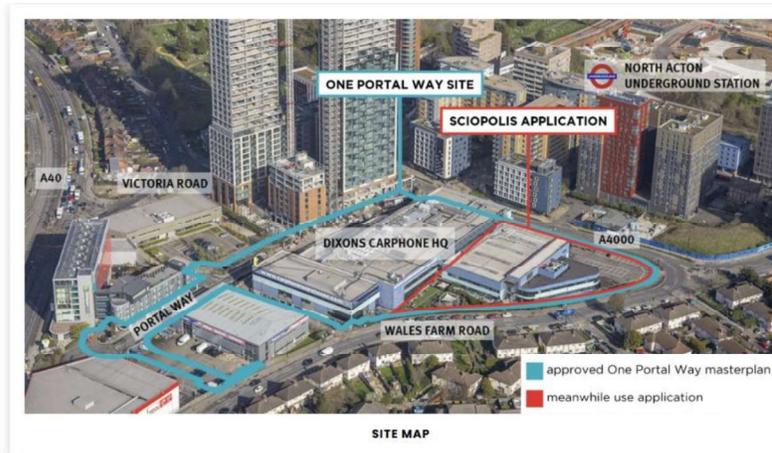
The 2021 period to the present

In March 2021 the OPDC undertook a second review of its schemes of delegation to Ealing and Brent and established new arrangements. This ensured greater involvement of OPDC officers in pre-application discussions and preparation of committee reports. Subsequently the Corporation has chosen to ‘retain’ decisions on applications deemed ‘strategic’ (as it had always been entitled to do but chose not to in the 2015-21 period).

In the period 2021 – 2025, the OPDC has granted planning consents to a further 3 major schemes at North Acton (see below on student housing). One further major scheme (462 co-living units at the former Castle pub site) was delegated to and consented by Ealing in 2022.

Recent schemes which have been portrayed by applicants as satisfactorily ‘completing the cluster’ are **not** moving swiftly to construction stage. Although a March 2024 Decision Notice was issued to Imperial College on 1 Portal Way (now badged as [One Portal Way](#)), this has not yet been followed by the discharge of any pre-commencement conditions.

Imperial have recently consulted on substantive ‘meanwhile’ proposals for refurbishing the existing Currys PLC building on the site. If consented, this is due to include 5,000m2 of laboratory and office space, operated by Sciopolis, who provide spaces and support for growing companies in science and technology



Imperial's site at One Portal Way with 'meanwhile' proposal in red

Imperial College has been asked by our forum to provide updated information on their planned phasing on their full consent and the outline part of their hybrid consent. Their scheme is due to include a major new public open space, billed as a new ‘green heart’ for North Acton.

On the Aldau ‘twin tower’ proposals for 4 Portal Way (see image below) no Decision Notice has yet been issued by OPDC.



The 58 and 44 storey towers of the consented Aldau development at 4 Portal Way for 670 flats and a 900 room hotel. The completed One West Point (City & Docklands) is on the left. Shadow images of the towers in Imperial's consented scheme at one Portal Way in the background.

Tall buildings

Coupled with the completed development at One West Point (56 storeys) the three developments at One Portal Way and 4 Portal Way are due to be the tallest buildings at the North Acton Cluster. While buildings of 70 storeys and above have featured at the Isle of Dogs and other developments in east London, these heights have been new to west London. One West Point is very prominent on the West London skyline. The public continue to ask ‘how did that happen’?

One of our reasons for preparing this case study is to warn Londoners that this *can* happen in most of London’s Opportunity Areas and regeneration zones. Paragraph 4.7 of *Towards a London Plan* seeks fresh evidence and views from the public on options for the treatment building heights in a new London Plan, saying *the new plan could take a more active role in identifying and defining tall building clusters. This could allow more strategic consideration of tall buildings, their role and potential capacity and cross-borough issues.* There is also discussion on *what height is meant by a tall building cluster* and whether the Mayoral referral threshold of 10 storeys/30 metres should be retained.

In 2025, the Mayor has decided not to intervene on refusal by LB Wandsworth of a 29 storey tower at Battersea Bridge. But in parts of an Opportunity Area such as Old Oak, where there is a small or transient resident population, there will usually be little push back from the public. This has been the case at North Acton since 2015. The Old Oak Neighbourhood Forum has been almost the only body to submit representations on the applications mentioned above. The area has no established residents association.

Student Housing at North Acton

Purpose Built Student Accommodation (PBSA) formed a significant part of what was described as ‘successful regeneration’ at North Acton in the Mayoral 2015 OAPF. This document also cautioned at paragraph 5.72 that *In recent years there has been a high provision of student accommodation within North Acton and whilst these uses are supported and have helped to regenerate and bring a new population into the area, it is important that future schemes seek to provide a greater mix of tenure types and typologies to accommodate a more mixed, balanced and sustainable community.*

No heed has been paid to this advice. We believe that there is now a significant over-concentration of student units at North Acton, bringing irreversible change to this part of Ealing.

This topic was raised by local residents with the Inspector of the OPDC Draft Local Plan, in 2019. He asked OPDC officers to provide a second response for a Examination hearing, including a forecast of future trends.

A [second note from OPDC](#) responded to discussion at an EIP hearing. This included a table of PBSA accommodation at North Acton adding up to 2,795 units. The note stated *OPDC is also not aware of any other student schemes in the pipeline for the place and officers do not consider this to be evidence of overconcentration of student housing in North Acton and Acton Wells. The remainder of the housing supply target for this place is currently expected to be provided as conventional housing.*

No evidence was provided to support this last claim. As a profitable part of the London development market, several further applications including PBSA have come forward at North

Acton. Our analysis is that North Acton will have over 5,000 units of student accommodation based on existing, consented and imminent schemes (see Annexe 2).

The overconcentration issue remains a real concern of our members. Areas with high numbers of students can be appealing to those who choose to live in an established university town or in parts of London (e.g. Bloomsbury, Fitzrovia) which include several universities and Higher Education Institutions. A university campus in a big city, with academic buildings alongside halls of residence for graduates/post graduates at the same university has a distinct feel and vitality. An area which becomes (by accident) a concentration of 'student dormitories' with commercial PBSA towers occupied by students from multiple HEIs has a different quality.

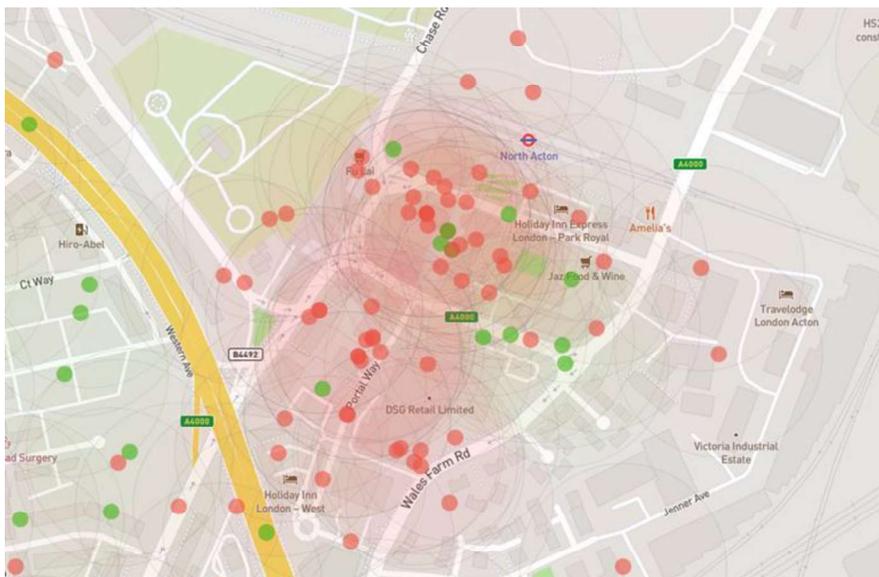
North Acton has a limited retail offer geared to a preponderance of students. Daily overcrowding at North Acton station may be resolved if and when OPDC assemble the resources for a major upgrade of the station. In the meantime the dominant student presence adds to the feel of a transient part of the city with no settled community.

We argue that 2021 London Plan Policy H16, and the subsequent October 2024 London Plan Guidance on Purpose-built Student Accommodation pays insufficient heed to the difference between concentrations in an around a university campus, and a 'student dormitory' area such as North Acton has become.

Our own calculations on growing student numbers as a percentage of the number of other households and residents living at North Acton do not coincide with the picture painted by Savills, Rolfe Judd and other consultants used on recent applications to provide a detailed assessment of 'need and concentration' of student accommodation at North Acton (see Annexe 2 to this case study).

North Acton is not the only part of London experiencing the impact of such concentrations. A transient demographic is very different from a longstanding multi-generational community. Problems are exacerbated by the increasing blurring of boundaries between student units, co-living accommodation, and the market for short-term 'holiday lettings' and 'business traveller lettings'. This is the next issue addressed in this case study.

The short-term lettings market at North Acton



Mapping data on North Acton from [Inside Airbnb](#)

Mapping data from the website [Inside AirBnB](#) shows an appreciable concentration of short-terms lets available at North Acton, with a majority of these being for ‘entire home/apartment’ rather than ‘sharing’. As with other parts of the OPDC area where new build high-rises have experienced lack of demand for orthodox rentals or sales (e.g. Scrubs Lane NW10) it is not hard to find opportunities for a rental of a few days at apartments at One West Point) or nearby buildings (see Annexe 3 below).

We are also concerned that the short-term letting market now has footholds in PBSA properties including those recently consented at North Acton. And that ‘co-living’ properties being built or recently opened (such as the [Stay Club at 50 Western Avenue](#)) are in practice being used student accommodation. This latter development of 264 units was granted consent as co-living (sui generis) but is being marketed for students. If not a breach of planning controls, this practice distorts figures on ‘over-concentration’ of student accommodation as discussed above.

This blurring of uses between student accommodation, co-living units, short term lets for tourists and business visitors, and hotels is not yet being responded to within the planning system. Enforcement of permitted uses is difficult and time-consuming. **The next London Plan needs to look for ways to address these issues.**

Lack of open space at North Acton

The 2015 OAPF acknowledged at paragraph 5.73 that *Within North Acton there is a lack amenity space. New development will need to make an adequate provision of new public, communal and private amenity space.* What progress to this end has been made?

The OPDC Local Plan sets no specific policies on the level of public open space that should be made available in the different ‘Places’ in the Local Plan. The Plan includes an important policy commitment EU1c on Open Space which reads support the delivery of a minimum of 30% of developable area outside the Strategic Industrial Locations (SIL) as publicly accessible open space including spaces identifiable in the Places Chapter.

A 2023 case study¹² comparing open space provision in ‘regeneration areas’ across London showed North Acton as coming out with the lowest level c c) support

<i>Queen Elizabeth Olympic Park (excluding visitors)</i>	<i>18 m2 public and shared open space per person</i>
<i>Kings Cross</i>	<i>2.57 m2 public open space per person</i>
<i>Vauxhall/Nine Elms/Battersea (excluding visitors)</i>	<i>0.78 m2 public open space per person (excluding visitors)</i>
<i>North Acton</i>	<i>0.31 m2 public open space per person</i>

The study continued: *The only development proposal consented at North Acton is the Imperial scheme for One Portal Way. This includes plans for a significant central public open space, which would improve the very poor ratio shown above.* It is not now clear how this may be affected by Imperial’s ‘meanwhile’ proposition for the site, referred to above.

The impact of unjustified ‘hype’ on the future of North Acton and the OPDC area

As argued in our main submission, we consider that the level of ‘hype’ that has been promoted for the OPDC Opportunity Area overall, including North Acton, has been harmful and is proving

¹² See at [What is the future of high-rise housing? → Pollard Thomas Edwards](#)

counter-productive. We do not have all the commercial information necessary to demonstrate that land values in the area saw a jump at the time when the area began to be promoted on the back of HS2 claims of Old Oak Common station, but we see signs that this happened.

Boris Johnson's introduction to the 2015 OAPF argued 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*. We are now 10 years on from this claim, which lacked sound justification at the time.

We consider that that three significant stakeholders involved in regeneration at North Acton have promoted the attributes of the location in a manner which has proved counterproductive. We do not see LB Ealing as the 'host Borough' as being the main culprit. As mentioned above North Acton has played no part in public debate on the new Ealing Local Plan and the Borough's 'Seven Towns'.

OPDC took relatively little interest in development at North Acton in the 2015-21 period, as explained above. Since that time OPDC has focused its main attention on the area of 'Old Oak West' as reconfigured by the 2024 Old Oak West SPD and now defined by a boundary being used for Land Referencing and a potential CPO. This includes only a small area of North Acton around the North Acton station and the area known as Acton Wells.

The three stakeholders who have most talked up the attributes of North Acton as a 'coming place' are HS2 Ltd (as part of its wider promotion of the catalyst impact of Old Oak Common station) followed by Imperial College and landowners/developers City & Docklands. While this is not a subject which is covered much in studies of Opportunity Areas, we feel that it is worth looking at some of the detail. The issue is whether 'over-promotion' and 'hype' about an Opportunity Area can do more harm than good.

HS2 and its promotional activity

This subject is also covered in our main submission. This addresses the implications of the June 18th 2025 announcements and House of Commons debate on the 'reset' of the HS2 project.

In March 2025 HS2 held an event for the development industry at the Victoria Industrial Estate at on the border of North Acton. Titled *From Trains to Cranes*, the theme of the event was the prospect of a West London 'development boom' and how HS2 and Old Oak Commons station will bring £10bn of investment to the area. Evidence offered was in the form of a [report from consultants Arcadis](#). A similar exercise was carried out in the West Midlands, in relation to the Birmingham end of the remaining HS2 project.

Amongst the key figures cited by HS2, in what was promotional campaign, was a 202% increase in the 'construction value of new schemes'. We fail to see to work out why this metric should be viewed as a benefit to ordinary Londoners. It lends support to our concerns about jumps in land values and develop-led 'regeneration'. Was the campaign designed to raise future DfT receipts when the development value of HS2 construction compounds is returned to the Department at a later date?

This HS2 event was held shortly before the annual global real estate fair at MIPIM 2025, in Cannes. No mention was made of further delays on the HS2 programme, although Mark Wild's recently published letter to the Secretary of State is dated 31 March.



Extract from HS2's From *Trains to Cranes* material

HS2 Ltd has since published a series of additional *Cranes to Trains* videos, as 'spotlights' on other stakeholders at North Acton. These include videos featuring Imperial College and developers City & Docklands.

Imperial College and the WestTech corridor

The College's involvement at North Acton dates back to its development of two halls of residence, Woodward Hall (2015) and Kemp Porter (2019). These have 1,250 units of student accommodation between them.

A student led *I'm Against Acton campaign* protested about the College's policy of relocating student halls to Acton while closing older accommodation much closer to Imperial's South Kensington campus. The objections from students echo those of Old Oak residents unhappy with North Acton's lack of amenities compared living in older premises nearer the South Kensington campus, seen as having more tradition and atmosphere but being sold off.

Imperial's involvement at North Acton extended significantly with its acquisition in 2017 of the Dixons Carphone site at One Portal Way. The reported acquisition cost was £85m, compared with around £40m when the site previously changed hands in 2013. In October 2024, Imperial also acquired the Victoria Industrial Estate from SEGRO for a reported £115m. The College is now very heavily invested in North Acton, with this last acquisition involving taking on £50m in debt¹³

The current position on Imperial's scheme at One Portal Way, with recent proposals for 'meanwhile' uses, has been covered above in this case study. These two major acquisitions mean that the College now has a strong commercial interest in promoting the concept of North

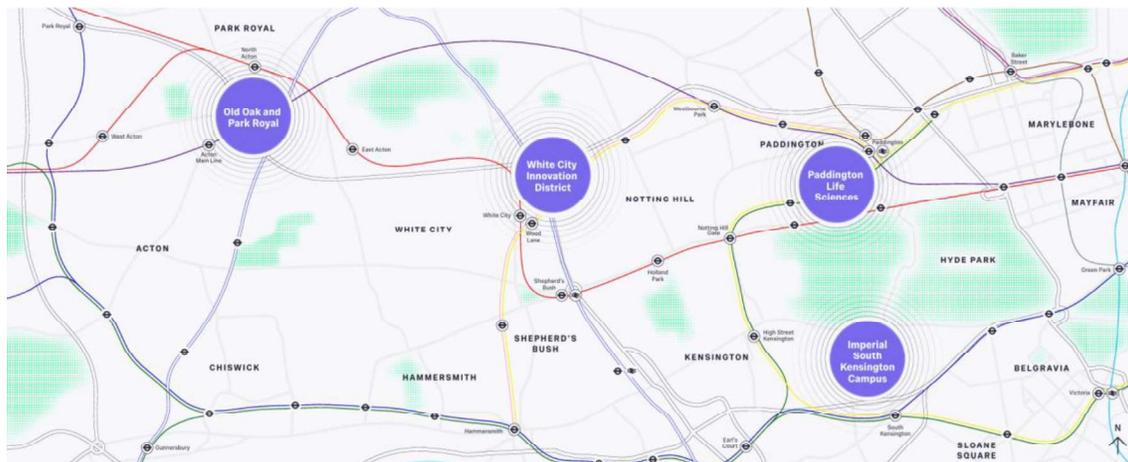
¹³ The College Council minutes for 27 September 2024 record at 10c and 10d c. *the Endowment Board considered funding the acquisition; however, it would have introduced excessive concentration risk within the existing property portfolio so it would be positioned on the university's balance sheet. d. the proposal involved an additional £50 million of debt, which was within Imperial's market debt capacity. The funding strategy had been discussed and approved by the Finance Committee*

Acton as part of a *West Tech Corridor*, and buying into HS2's promotion of a 'development boom' built around OOC station.

The College's contribution to this development industry narrative is reflected in this [HS2 'spotlight' video](#) presented by Imperial's Investment Director and on [the One Portal Way consultation website](#). The College's '[investment prospectus](#)' for the WestTech Corridor starts with the familiar mantra *Old Oak and Park Royal – London's largest regeneration zone and the future home of Old Oak Common Station, the largest new station in the UK (and expected to be one of the busiest) – will play a crucial role in WestTech London*. Developers will undertake due diligence and ask '*when will this happen?*' It seems unwise for all stakeholders in the Opportunity Area to think that the June 18th announcements will have little or no wider impact than for HS2 alone.

We are not suggesting that all such promotional activity is 'hype'. Our two neighbourhood forums, located at Old Oak and in North Kensington adjacent to Imperial's White City campus, recognise the strong performance that has been achieved in the White City Opportunity Area. Hammersmith & Fulham Council, in its promotion of the White City Innovation District (jointly with Imperial) seem to us to be demonstrating a more mature approach. The Council's prospectus [Upstream London](#) has less exaggerated claims, more solid evidence, and more recognition that an successful 'innovation district' has genuine benefits for Borough residents rather than just profiting landowners and the development industry.

WestTech London.
Fuelling innovation and
driving global impact.



From Imperial College's May 2025 [WestTech investment brochure](#)

City and Docklands

These developers have also become a significant stakeholder in the OPDC area. A further HS2 'spotlight' video is presented by [City & Docklands CEO Gary Sacks](#).

On the east of the OPDC boundary, City & Docklands developed the Mitre Yard BTR scheme at Mitre Bridge/Scrubs Lane, sold in 2024 to the Alberta Investment Management Corporation (AIMCo) and Ridgeback Group. The company also developed the neighbouring North Kensington Gate, [billed on its website](#) in these terms: *This will be one of the most dynamic and*

best connected new residential districts in the UK. North Kensington Gate will not only offer a unique and luxurious lifestyle opportunity, but will be at the forefront of the transformation of a visionary £26 billion masterplan that will generate a growth zone of unprecedented potential for a decade to come.

City & Dockland are the developers of One West Point, the scheme at 6 Portal Way. As described above, this was consented by LB Ealing in two stages, at 45 and 55 storeys, under OPDC's delegation scheme.

City and Docklands chief executive Gary Sacks states in the HS2 video that this scheme has been *100% occupied for the last three years*. What type of 'occupation'? The list of managed short lets in Annexe 3 to this case study all appear to be based in this building.

Sales and rentals of apartments are [marketed on the website](#) in these terms: *One West Point is ideally located and in close proximity to what will be the most important transport hub in the UK. It is the only place where the Elizabeth Line, HS2 and the Central Line combine and 3 other major rail networks are within 5 minutes reach. Journey Times will be further revolutionised by the opening of the HS2 Superhub and from One West Point you will be able to reach Bond St in 9 minutes,*

We have previously succeeded in persuading these developers (and others) to remove from their websites inaccurate claims that HS2 and Old Oak Common station will open in 2026. It is not the role of local voluntary groups to have to monitor and attempt to police misleading promotional material. Because such over-promotion starts with HS2 Ltd (a Government funded agency which the public might assume to be honest in its communications) other commercial parties seem to feel free to put out similar misinformation¹⁴.

The 'proposition' for the OPDC Opportunity Area in the new London Plan

Our main submission sets out the many reasons why our two neighbourhood forums do not accept that the Old Oak and Park Royal Opportunity Area should move up two categories from 'nascent' to 'underway'. This case study provides additional detail for questioning the proposition.

North Acton has been the part of the Opportunity Area in which most development has emerged from the ground since 2015. But all the development sites of any size are now the subject of built developments or consented schemes (apart from those in adjacent Acton Wells).

There are now doubts on whether the largest developments a One Portal Way and 4 Portal Way, critical to a future North Acton will proceed on anything like the timelines envisaged at consent stage. A further consented scheme at 'The Portal' has a final consent issued in October 2023 but with construction not yet begun.

Unlike the rest of the OPDC area, North Acton now has virtually all its development sites spoken for, even if several of the largest consents are currently inactive. This one location in the OA has had its 'growing' stage, very largely unplanned. The outcome (in our view) is a lesson of what should be avoided elsewhere at Old Oak,

¹⁴ The Central Line will not 'combine' with others at OOC station. It may remain the fastest way to get from One West Point to Bond Street, via North Acton station. But not in 9 minutes. OOC station will not help.

We see North Acton as a microcosm of how the dangers of talking up ‘regeneration’ and unjustified hype on ‘development booms’ for individual Opportunity Areas. Over-reliance on delivery of a single piece of transport infrastructure, in the form of a rail interchange, has created a scenario in which financial viability may now be sinking further underwater, when coupled with continued high interest rates and construction costs. The ‘regeneration’ impact of the OOC rail interchange, as a £1.7bn example of gold-plated engineering, was over exaggerated from day one.

We hope that this case study reinforces the proposal in our main submission, that a tightly focused external review of the position on the Opportunity Area and on OPDC’s masterplan proposals should be undertaken at this stage in the preparation of the next London Plan

Old Oak Neighbourhood Forum and St Quintin and Woodlands Neighbourhood Forum
June 2025

Annexe 1 to this case study is a table prepared by OPDC of the eight major applications determined by LB Ealing on behalf of OPDC under delegation arrangements.

Annexe 2 gives our analysis of numbers of units of student accommodation at North Acton, as compared with the remainder of the resident population.

Annexe 3 gives examples of web listings for short-let accommodation, all of which appear to be managed by a single operator and located at One West Point, North Acton. This is only a snapshot of a wider picture of a growing trend in the OPDC area.

No.	Site	Planning Application Ref:	Description:	Status:	OPDC Local Plan Site Allocation	
					Homes	Commercial floorspace (sq.m)
1	Holbrook House	16113OPDS Submitted February 2016 171246OPDC2 Submitted March 2017	Part 16/part 18/part 24 storey building providing 498 student bed spaces and 91.sq.m commercial unit on ground floor.	Development completed.	280	100
2	The Portal	165514OPDFUL Submitted October 2016	Part 10/Part 36 storey building with 350 residential units, plus flexible commercial floorspace at ground floor.	Resolution to Grant at Ealing Committee 17 May 2017, subject to s106 Legal Agreement and Stage 2 Mayor Referral. Amendments to approved scheme following discussions with GLA. Amended scheme Resolved to Grant at Ealing Committee 21 October 2020, subject to s106 Legal Agreement and Stage 2 Mayor Referral. Awaiting legal agreement and Stage 2 referral.	350	550
3	Perfume Factory North	181062OPDFUL Submitted March 2018 (Resubmission)	Three buildings of 12 to 25 storeys comprising 376	Resolution to Grant at Ealing Committee 23 May 2018, subject to	300	1400
		of Refused 2017 scheme)	residential units and 1,349 sq.m of commercial floorspace.	s106 Legal Agreement and Stage 2 Mayor Referral. Amendments to approved scheme following discussions with GLA. Amended scheme resolved to grant at Ealing Committee on 20 January 2021. Stage 2 Mayor Referral completed 15 February 2021. Now awaiting completion of legal agreement.		
4	Perfume Factory South	172682FUL Submitted May 2017 185376OPDVAR Submitted November 2018	Five buildings of 5,7,10,11 and 31 storeys comprising 736 student bed spaces, 85 residential units and 6,214 sq.m of offices.	Planning permission granted December 2017. Development under construction, and almost complete.	286	4970
5	1 Portal Way (Carphone Warehouse)	P/2015/0095 Approved August 2016	Outline permission for 8 blocks of 6 – 32 storeys for up to 764 residential units plus up to 10,268 commercial floorspace.	Site purchased by Imperial College in December 2016. Feasibility discussions with LBE and OPDC on a new scheme underway. Formal Pre-application expected early 2021.	n/a	n/a

6	2 Portal Way (Dephna)	177810OPDFUL Submitted October 2017	Two buildings of 25 and 35 storeys comprising 380 residential units, plus workspace and commercial kitchens on lower levels.	Resolution to Grant at Ealing Committee 21 February 2018, subject to s106 Legal Agreement and Stage 2 Mayor Referral. Awaiting s106 Legal Agreement and Stage 2 Mayor Referral.	280	5300
7	4 Portal Way (Holiday Inn)	191854OPDFUL Submitted April 2019	Linked towers of 45 and 55 storey comprising 702 residential units, new hotel, workspace, retail and restaurants.	Resolution to Grant at Ealing Committee 19 February 2020, subject to s106 Legal Agreement and Stage 2 Mayor Referral. Stage 2 Mayor Referral completed 18 January 2021. Awaiting completion of s106 Legal Agreement and OPDC and GLA have been involved in preparation of s106 Legal Agreement.	n/a	n/a
8	6 Portal Way (Portal West)	161144FUL Submitted March 2016 granted Feb 2017. 190582OPDVAR Submitted January 2019. Approved June 2020. 192597OPDFUL	Four buildings of 2,9,11,38 and 54 storeys comprising 701 residential units and 3,719 sq.m of commercial floorspace	Under construction. Original planning consent for 578 units. Section 73 and full planning application for additional storeys and additional units approved since the original consent have taken the total to 701 units.	578	3200

ANNEXE 2 Short term lettings at North Acton

The following listings feature on Booking.com under their heading of 'Apartments'. They appear to be 'whole apartment' lettings in the same building (One West Point 6 Portal Way) and managed by a single agency.

If these listings prove to be 'dead' when searched for, this is likely be because the building owners and/or OPDC have taken action to have them removed. This would be a small success. The links were live at the time of submission of this case study to the GLA. Currently AirBNB seem to be doing a better job than Booking.com at filtering out professionalised businesses letting multiple apartments in the same block (which is usually a breach of lease conditions).

[Luxury High-Rise Apartment with Stunning City Views in Acton, London \(updated prices 2025\)](#)

[North Acton III - 2 Bedrooms - 2 Bathrooms - Balcony, London \(updated prices 2025\)](#)

[Apartment North Acton-1 by Interhome, London \(updated prices 2025\)](#)

[North Acton XII - 2 Bedrooms - 2 Bathrooms - Balcony, London \(updated prices 2025\)](#)

[North Acton II - 2 Bedrooms - 2 Bathrooms - Balcony, London \(updated prices 2025\)](#)

[North Acton X - 2 Bedrooms - 2 Bathrooms - Balcony, London \(updated prices 2025\)](#)

ANNEXE 3 LEVELS OF STUDENT ACCOMMODATION AT NORTH ACTON – IS THERE NOW AN OVER-CONCENTRATION?)

Below is an extract from document ID-30 as provided by OPDC to the Inspector of the OPDC Draft Local Plan in response to an EIP hearing in February 2019. This was after OONF and others had questioned the impact of student accommodation in this small part of Ealing.

1.8. The table 1 below shows that there are 2,795 completed or started student bed spaces in North Acton and Acton Wells provided as PBSA schemes. In accordance with the draft new London Plan ratio approach, this comprises 14% of the place housing supply target of 6,000 homes. OPDC is also not aware of any other student schemes in the pipeline for the place and officers do not consider this to be evidence of overconcentration of student housing in North Acton and Acton Wells. The remainder of the housing supply target for this place is currently expected to be provided as conventional housing.

Table 1 PBSA schemes in North Acton

	Student bed spaces	Dwelling equivalent
1 Victoria Road	659	198
Lyra Court	184	55
The Costume Store	718	215
Holbrook House	498	149
140 Wales Farm Road	736	221
Total	2795	838.5

OPDC's prediction that *the remainder of the housing supply is currently expected to be provided as conventional housing* was not evidenced and has proved incorrect,

The following schemes with PBSA units have since been consented at North Acton (or a few hundred metres outside the boundary of the 'place' as defined in the local plan, in the case of 5-7 Park Royal Road. (Dwelling equivalents are not shown below, and are now 2.5 student units to one housing units whereas at the time of the OPDC table the ratio was different).

5-7 Park Royal Road (Tiago Properties)	888 units
One Portal Way (student or co-living) Imperial College	384 units
Holiday Inn Victoria Road (Downing Lts)	609 units
Total	1,881 units

There is a further Imperial College application pending for the redevelopment of one of their buildings. We are also adding an assumed figure of 50% of units at the [Stay Club Western Avenue](#) (which markets its units as student accommodation) and 30% at the co-living accommodation being built at the former Castle Hotel site.

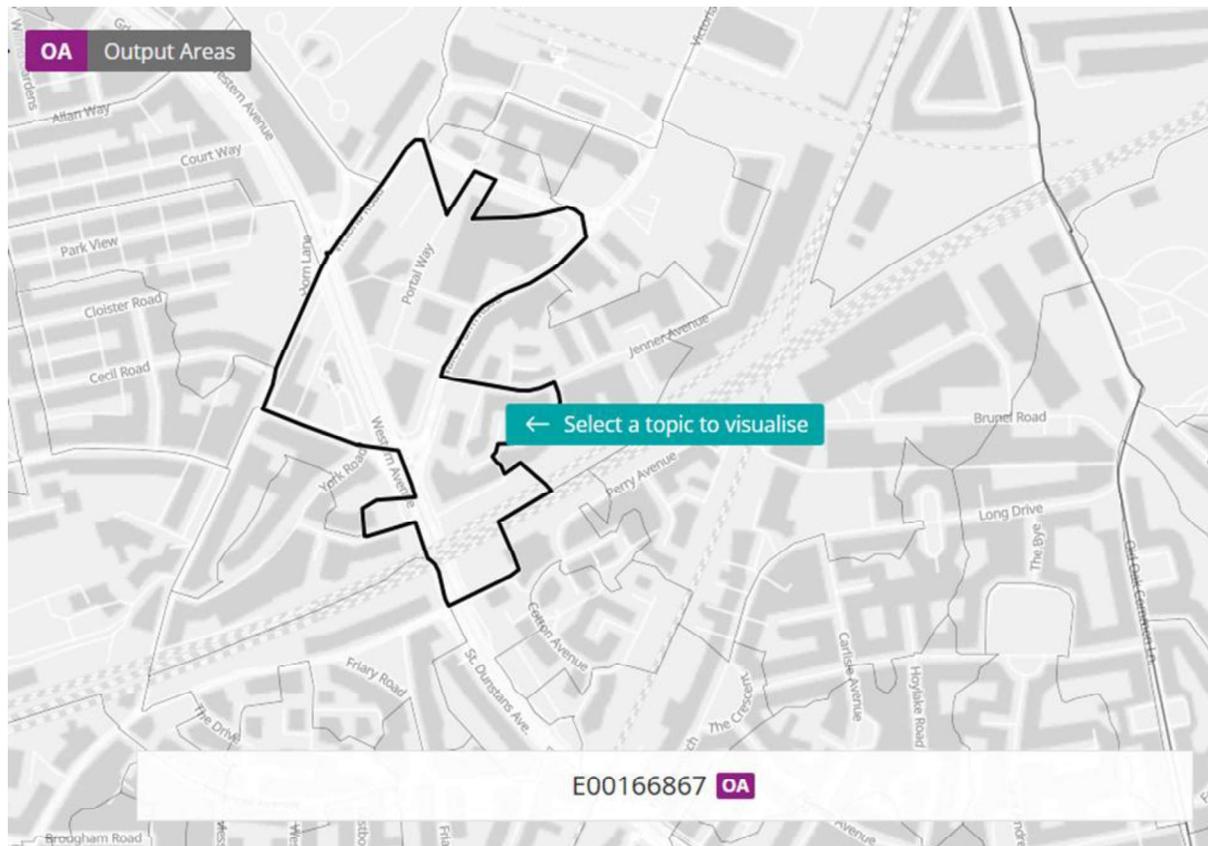
Woodward Hall Block A (imperial)	268 units
50 Western Avenue Stay Club (50%)	132 units
Former Castle Hotel	139 units
	539 units

Combining these three sets of figures gives a potential grand total of 5,215 student units at North Acton.

The current resident population of North Acton is not an easy metric to find. ONS data is available for the whole ward, an area larger than the North Acton cluster within the gyratory system and now forming the 'cluster' and 'neighbourhood centre in the OPDC Local Plan.

Assessments undertaken by consultants in support of planning applications for PBSA units make the assumption that the 'pipeline' of conventional C3 homes will be built out. This lowers dramatically the current and future 'concentration' levels. It does not reflect present reality many of these hundreds of C3 units may never be built. The OPDC adopted the same approach in their responses to the Planning Inspector.

North Acton has an unusual demographic, in having always been a location dominated by business uses. Our analysis of ONS data from the 2021 Census comes up with an extraordinarily small population figure for Output Area E00166867 of 64 households with a population of around 134 people.



This area extends southwards along the A40, where there is little housing on the east side of the road but new developments on the west. The 'core' area of the North Acton gyratory includes developments on the south side of Victoria Road (Ebbetts Court and Poulton Court). There are also the new developments which have been completed in Wales Farm Road and at 6 Portal Way (One West Point). There are some 35 houses in Park Royal Road, which we are including in the figures below given that we are also including the PBSA development at 5-7 Park Royal Road. This gives the following set of C3 housing units:

140 Wales Farm Road (Imperial)	85 residential units
Park Royal Road nr North Acton	35 existing houses
Poulton Court (2005 consent)	446 residential units
Ebbett Court Victoria Road	191 residential units
6 Portal Way (One West Point)	701 residential units
Perfume Factory Essential Living	380 residential units (close to completion/occupation)
Uncle, Perfume Factory	238 residential units
Rehearsal Rooms	173 residential units

These add up to 2,249 residential units. Many of these are 1 and 2 person units, but even making an assumption of 2.3 person per household this comes to a 'resident' population of around 5,173 persons currently living in 'conventional' C3 housing at the core area of North Acton.

Unless we are missing some substantial developments of new housing, as opposed to student beds, this suggests that numbers of 'students' and of 'residents' are roughly the same, or a 50/50 split. This is not what has been suggested in two of the three assessments by consultants supporting PBSA applications. These have given the following calculations and results:

Savills Residential Research Report for Tiago Properties Limited May 2024

PBSA beds as % of population: currently 23% dropping to 19% as PBSA and housing pipelines are built out (this assessment includes the Acton Wells area as well as North Act and assumes that OPDC 15 year projections are built out. Not a relevant assumption when considering current 'over-concentration').

Savills North Acton PBSA Needs Assessment - Final report for Imperial College December 2004

	MSOA areas in London with the Largest number of students	Borough	No. of FT students (2022/23)	FT students as % of total population
1	Mill Meads	Newham	4,705	78%
2	Colindale East	Barnet	1,320	66%
3	Tokyngton	Brent	6,599	56%
4	Elephant & Castle	Southwark	2,530	52%
5	Uxbridge Central & Brunel	Hillingdon	2,378	49%
6	Fitzrovia East & Bloomsbury West	Camden	3,710	47%
7	North Acton	Ealing	3,312	46%
8	Mile End West	Tower Hamlets	2,719	46%
9	Uxbridge West	Hillingdon	2,560	43%
10	Aldgate	Tower Hamlets	2,779	42%
11	Borough & Southwark Street	Southwark	3,156	41%
12	Kings Cross and Bloomsbury North	Islington	2,793	41%

This assessment gives a 2022/3 figure for student numbers (now out of date) and comes up with a 46% figure for FT students as a % of total population. This seems to be close to current reality.

Rolfe Judd Mixed and Inclusive Neighbourhood Assessment February 2023 (to support Holiday Inn Express application from Downing Ltd

Refers back to the Local Plan Examination and assumes a student bed number of 3,550 (not up to date).

Concludes that *Therefore, it is considered that the introduction of a mixed-use scheme for residential units and student accommodation at the application site will not result in an ‘over-concentration’ of student accommodation and will contribute just 18% of the housing supply targets of the North Acton and Acton Wells area.*

Also claims *The analysis identifies that there are a total of 4,007 residential units and 2,820 student beds (or 1,128 equivalent residential units) within the geographical area being constructed or delivered, which equates to 78% residential and 22% PBSA.*

OPDC report to Planning Committee on Holiday Inn Express application May 2025

What needs to be established is a set of figures from OPDC as the planning authority required to apply London Plan and Local Plan policies on student housing. The officer report on the recent application from Downing Ltd included a section on the overconcentration issue stating.

- 7.13 *Turning to the policy requirement to ensure mixed and inclusive neighbourhoods (or prevent an overconcentration of PBSA as referred to by the Local Plan), ‘overconcentration’ in this regard is not quantitatively defined in local or strategic planning policy. To provide a benchmark, the assessment references an analysis carried out by OPDC to support the Local Plan1 that 22 per cent of housing will be provided as student housing in North Acton; it also reiterates OPDC’s position at Local Plan examination stage (2022) which concluded that there was no evidence of overconcentration of PBSA within North Acton at that time.*
- 7.14 *The report then goes on to consider more recent pipeline developments in North Acton, including schemes under construction and with pending planning permissions, showing that the proportion of PBSA beds to residential homes would only be 25 per cent for all emerging schemes in the neighbourhood. On this basis, the report concludes that there would not be an overconcentration of PBSA as a result of the proposals in existing or future scenarios.*

These various formulations show the difficulty in arriving at any meaningful definition of an ‘over-concentration’. Should the GLA ratio of 2.5 student beds being equivalent to one housing unit play any part in such assessments, and if so, why?

Until evidence is provided to the contrary we will stick with our analysis above. In simple terms:

If Imperial’s application for 268 student beds at Woodward Hall Block A is approved, there will be over 5,000 students living at North Acton (excluding any development in neighbouring Acton Wells).

This is similar to the current resident population, which we estimate to be around 5,000 (including consents nearing completion but not 4 Portal Way or The Portal. Precise figures may always be difficult as ‘students’ may well be renting BTR accommodation classed as C3. ‘Ordinary residents’ should be taking bedspaces in student accommodation. **We see a 50/50 split as an ‘over-concentration’ outside a university campus, and at very high density location..**