



Old Oak Neighbourhood Plan Regulation 14 Consultation

OPDC Local Planning Authority Response

8 September 2026

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1. Status of OPDC's response

- 1.1 This response is provided by OPDC in its capacity as the Local Planning Authority (LPA) for the Old Oak neighbourhood area. Any reference to OPDC in the document relates to OPDC as LPA. The response has considered both the draft Old Oak Neighbourhood Plan and its annexes. It has been written by OPDC planning officers and informed by Kings Counsel advice. Due to the timing of the consultation period, OPDC has not been able to secure formal approval of the response by OPDC's Board or OPDC Planning Committee. However, in agreement with the Chairs, the response has been circulated to Board and Planning Committee members for informal review. It has been endorsed by the Chair of OPDC's Board and Chair of OPDC Planning Committee.
- 1.2 Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 requires the Old Oak Neighbourhood Forum as a qualifying body to publicise the draft neighbourhood plan and consult relevant bodies before submission to OPDC as LPA at the Regulation 15 stage.
- 1.3 At this stage, OPDC is responding as a consultee. OPDC is not determining whether the draft neighbourhood plan meets the Basic Conditions. The statutory process provides for the Forum to submit the plan under Regulation 15, for OPDC to publicise the plan under Regulation 16, for an independent examination to take place and for OPDC to consider the examiner's report before deciding whether the plan should proceed to referendum.
- 1.4 OPDC is raising these matters at Regulation 14 stage to assist the Forum in preparing a more robust submission version of the plan and to reduce the risk of abortive work at later statutory stages.

2. Summary of OPDC's position

- 2.1 OPDC supports the principle of a neighbourhood plan that positively plans for the Old Oak Neighbourhood Area, helps integrate existing communities with new development, supports the delivery of growth and provides locally specific guidance that complements the Local Plan, London Plan and National Planning Policy Framework.
- 2.2 OPDC also supports and shares many of the draft plan's aspirations including those relating to sustainable travel, such as improving walking and cycling connections, the enhancement of open space and public realm, the conservation of heritage assets and ensuring development responds sensitively to existing residential communities.
- 2.3 The role of the LPA when a neighbourhood plan is submitted to it is explained at paragraph 053 of the government's Planning Practice Guidance. The LPA is to consider the draft neighbourhood plan against the statutory requirements in paragraph 6 of Schedule 4B of the Town and Country Planning Act (TCPA) 1990. An LPA has to be satisfied that a basic condition statement has been submitted but it is not required to consider whether the draft plan or order meets the basic conditions. It is only after the independent examination has taken place and after the examiner's report has been received that the LPA comes to its formal view on whether the draft neighbourhood plan meets the basic conditions. Nevertheless, paragraph 3 of Schedule 4B TCPA 1990 requires the LPA to provide such advice or assistance to the

neighbourhood forum as it considers appropriate for the purpose of, or in connection with, facilitating the making for proposals for neighbourhood development orders (which includes neighbourhood plans). Against that background, OPDC considers it is appropriate to highlight its serious concerns that the draft plan, as currently written, may not meet the Basic Conditions, NPPF requirements, Planning Practice Guidance or guidance in the Government's neighbourhood planning toolkits. To address these concerns, OPDC recommends that the Forum should substantially revise the plan before submission to OPDC. These are set out in detail in the following sections and summarised below:

- 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 we believe are likely to 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.
- Some policies are not sufficiently clear, positively framed, locally distinctive or capable of being easily applied in development management decisions.
- The Forum has not sought SEA or HRA screening from OPDC prior to Regulation 14 consultation.
- Some policies provide guidance for areas outside of the neighbourhood area, which is not allowed by legislation.
- The plan includes extensive commentary on the Old Oak Masterplan Framework, OPDC Position Statement, HS2 matters and wider background material that should be reduced, relocated to an appendix / supporting document or removed where it does not directly support planning policies.

2.4 OPDC considers that the draft plan would benefit from substantial revisions before submission.

3. Legislation, national policy, guidance and toolkit context

National Planning Policy Framework August 2026

- 3.1 Neighbourhood planning enables communities to develop a shared vision for their area and shape the development and growth of their local area. Once made, a neighbourhood plan forms part of the statutory development plan and is used in determining planning applications, alongside other parts of the development plan. However, neighbourhood planning sits within a wider statutory and policy framework. It is not a mechanism to prevent sustainable development or to reduce housing delivery that is otherwise proposed through the development plan.
- 3.2 This is reflected in the NPPF 2026. Annex A paragraph 6 confirms that any neighbourhood plan that is submitted to the Local Planning Authority after the publication of the NPPF 2026 must

comply with the NPPF 2026. Paragraph 2 states that the plan-making policies in the Framework must be taken into account in preparing any part of the development plan. Key policies comprise:

- NPPF Policy PM5(1) states that neighbourhood plans allow local communities to “plan positively for their areas by identifying and addressing community priorities that can be met or supported through the planning system”. Policy PM5(2) states that “The contents of a neighbourhood plan should not result in less development than specified in other parts of the development plan which cover the same area.”
- NPPF Policy PM6(1) is also relevant as footnote 5 confirms that Neighbourhood Forums are plan-makers. In particular:
 - PM6(1)(a) requires all plan-makers to include only matters and policies that are necessary and relevant and to avoid unnecessary duplication of other parts of the development plan.
 - PM6(1)(c) requires plan-makers to not include policies in plans which duplicate, substantively restate or are inconsistent with the content of national decision-making policies, unless directed by other policies in the Framework..
- NPPF Policy PM8 relates to evidence base. The policy sets out a range of requirements for developing proportionate evidence base that plan-makers should follow.
- NPPF Policy PM17 confirms that neighbourhood plans must meet the Basic Conditions (see below) and other legal requirements before they can come into force. Policy PM17(2) states that “The basic conditions include consideration of whether, having regard to national policies and advice contained in guidance issued by the Secretary of State (which includes policy PM6(1)(c) in this Framework that development plans should not include policies which duplicate, substantively restate or are inconsistent with the content of national policies for decision-making), it is appropriate for the neighbourhood plan to be ‘made’.”
- NPPF Policy L1 requires the development at the most appropriate level to “identify ways of accommodating as much as possible of the development required in the area on previously developed land”, including by “identifying whether minimum density standards should be set for other parts of the plan area, especially where there are opportunities for intensification”, to “contain policies and, where appropriate, masterplans to optimise the use of allocated sites” and to set “ambitious but deliverable expectations for the scale and density of development”. Policy L1(3) notes that development plans’ approach to making as much use as possible of previously development land and using minimum densities will be “tested robustly when plans are examined”
- NPPF Policy TR1(1)(b) requires plans to locate development where it can “make effective use of existing or proposed transport infrastructure”.
- NPPF Policy HC2 provides guidance for Local Plans and neighbourhood plans for designating Local Green Spaces.

Basic Conditions

3.3 The draft Old Oak Neighbourhood Plan must satisfy the Basic Conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as applied by section 38A of the Planning and Compulsory Purchase Act 2004 and amended by the Levelling-up and Regeneration Act 2023).

3.4 The Basic Conditions require that the draft plan:

- (a): has regard to national policies and advice contained in guidance issued by the Secretary of State.
- (d): must contribute to the achievement of sustainable development.
- (ea): must not result in less housing being provided in the neighbourhood area than would be provided if the Plan were not made.

- (f): must not breach, and must otherwise be compatible with, relevant legal obligations.
- (fa): must comply with the Environmental Outcomes Report requirement, where applicable.
- (g): must meet prescribed conditions and comply with prescribed matters, including relevant habitats requirements where applicable.

3.5 The Basic Conditions have changed following commencement of relevant provisions of the Levelling-up and Regeneration Act 2023. With effect from 25 March 2026, the previous Basic Condition requiring a neighbourhood plan to be in general conformity with strategic policies in the development plan has been removed and replaced by the new housing-related Basic Condition (ea).

3.6 This Basic Condition requires consideration of whether making the neighbourhood plan would result in the development plan for the local planning authority area proposing that less housing is provided by means of development than if the neighbourhood plan were not made.

Planning Practice Guidance

3.7 The Planning Practice Guidance (PPG) paragraph 1 of the [Neighbourhood Planning section](#) explains that neighbourhood planning “gives communities direct power to develop a shared vision for their neighbourhood and shape development and growth in their local area”. It also explains that neighbourhood planning provides “tools for local people to plan for the types of development to meet their community’s needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.”

3.8 Key PPG elements include:

- [Paragraph 3](#) regarding positive vision development
- [Paragraph 41](#) regarding the need for a concise plan, clear policies supported by appropriate evidence base.
- [Paragraph 44](#) regarding not repeating site allocations from elsewhere in the development plan.
- [Paragraphs 73 and 78](#) regarding SEA and HRA screenings.
- [Paragraphs 42 and 98](#) regarding site allocations in neighbourhood plans.
- [Paragraph 101](#) regarding local planning authorities setting an indicative housing requirement figure for neighbourhood plans.
- Draft [Design and Placemaking PPG](#) which no longer includes density ranges.

Government’s neighbourhood planning toolkits

3.9 The Government’s [neighbourhood planning toolkits](#) published between March and May 2026 and a latter batch in July 2026 provide guidance for preparing clear, focused, evidence-based and deliverable neighbourhood plans.

3.10 The most relevant messages for the draft Old Oak Neighbourhood Plan are summarised below in table 1 below. The Local Green Spaces toolkit was published in July 2026.

Table 1: Summary of the Governments neighbourhood planning toolkits

Summary	Toolkit reference
Policies and site allocations should be clear, positively worded and deliverable.	Writing Planning Policies – page 4, paragraph 1; page 5, paragraph 2; page 6, box 1; page 7, second paragraph; page 21, second paragraph.

	How to assess and allocate sites for development – page 30, penultimate paragraph.
Policies should be supported by proportionate robust evidence.	Writing Planning Policies – page 5, penultimate paragraph; page 6, box 1; page 17, second paragraph; page 22, first paragraph. Local Green Spaces – full document
Neighbourhood plan policies and site allocations should not duplicate/repeat other policies or site allocations in the development plan.	Writing Planning Policies – page 6, box 1, second paragraph; How to assess and allocate sites for development – page 10, second and third paragraphs; page 12, final paragraph; page 17, final paragraph. Keeping it Simple – page 3, top tip 3; page 5, 6 th bullet point; page 9, final paragraph.
Neighbourhood plans should support growth and not promote less development than the wider development plan.	Writing Planning Policies – page 7, second paragraph; page 21, second paragraph. How to address regeneration in your neighbourhood plan – page 8, second paragraph;
Site allocations should, at a basic level, set out the site boundary, quantum of development and proposed land use.	How to assess and allocate sites for development – page 29, final paragraph; pages 30, all paragraphs; page 31, paragraphs 1 to 5.
SEA and HRA screening should be sought from the LPA before the Regulation 14 consultation.	Screening Neighbourhood Plans for Strategic Environmental Assessment – pages 8 and 9

The wider development plan

3.11 The NPPF, PPG and toolkits makes multiple references to the wider development plan. For the draft Old Oak Neighbourhood Plan this comprises the Mayor of London's [London Plan 2021](#), OPDC's [Local Plan 2022](#) and the [West London Waste Plan 2015](#).

London Plan

3.12 For the purposes of this response, any references to the London Plan relate to the current adopted London Plan. It sets out policy D3 for optimising site capacity through the design-led approach. The Old Oak Neighbourhood Area sits within two major growth areas comprising:

- Old Oak / Park Royal Opportunity Area which has an indicative homes capacity of 25,500 new homes
- HS2 / Thameslink Growth Corridor

3.13 The [draft London Plan 2026](#) was published for consultation on 17 July with consultation running until 15 October 2026. As such it currently has very limited weight. The Plan will gain weight as it proceeds through to submission, examination and ultimately adoption. However, it is important

to note the draft plan's stronger emphasis on supporting growth and housing delivery across London and that the Old Oak Neighbourhood Area sits within three major growth areas comprising:

- Old Oak and Park Royal Brownfield First Opportunity Area which has an indicative homes capacity of 23,000 new homes
- HS2 Strategic Growth Corridor
- Elizabeth Line West and Heathrow Strategic Growth Corridor

Local Plan

3.14 OPDC's Local Plan sets out a spatial strategy to optimise growth within the Old Oak / Park Royal Opportunity Area. For the 2018 to 2038 plan period, the housing capacity is 19,850. The total housing capacity is envisaged to be 26,000. Parts of the Old Oak Neighbourhood Area sit within the Old Oak major town centre and include development sites in the Local Plan.

West London Waste Plan

3.15 The West London Waste Plan does not have a direct bearing on the content of the draft Old Oak Neighbourhood Plan.

4. Indicative Housing Requirement

Meeting the Indicative Housing Requirement and promoting development

- 4.1 OPDC has provided the Forum with an Indicative Housing Requirement (IHR) for the Old Oak neighbourhood area of a minimum of 510 new homes. This is set out in the IHR Note originally provided on 23 March 2026. An updated version was provided on 23 June 2026 which set out further detail reflecting a Kings Counsel opinion. Both of these documents are attached as appendices. The homes requirement remained unchanged in the updated version.
- 4.2 The IHR is based on the [Local Plan](#), the [Development Capacity Study Update 2021](#) and accords with the National Planning Policy Framework and the Planning Practice Guidance.
- 4.3 The June 2026 IHR note identifies the following site capacities:
- Goodhall Street East, DCS site 54 part: 42 homes.
 - Ursula Lapp, DCS site 55: 250 homes.
 - Lords Builders Merchants, Site Allocation 26 part: 158 homes.
 - Old Oak Cafe, 2 Victoria Terrace, DCS site 16: 10 homes.
 - Midland Gate, DCS site 30: 50 homes.
- 4.4 OPDC's position remains that the minimum IHR for the neighbourhood area is 510 new homes. Without the delivery of these homes, the adoption of the Old Oak Neighbourhood Plan as currently drafted would result in less housing being provided than if the plan were not made.
- 4.5 In light of the above, OPDC considers the plan is at risk of not meeting Basic Conditions (a) and (ea).

The Indicative Housing Requirement is not confined to Local Plan site allocations

- 4.6 OPDC does not agree with the Forum's position that the IHR should be confined only to capacities associated with Local Plan site allocations. The Forum makes reference to advice received regarding this matter. OPDC considers it would be beneficial to OPDC's role in supporting the Forum to have sight of this advice. This would be in the same spirit of transparency of OPDC sharing its Kings Counsel advice with the Forum.

- 4.7 The [PPG paragraph 101](#) confirms that there is “no set method” for setting a housing requirement figure for neighbourhood areas and that “the general policy making process already undertaken by local authorities can continue to be used to direct development requirements and balance needs and protections by taking into consideration relevant policies such as the spatial strategy, evidence such as the Housing and Economic Land Availability Assessment, and the characteristics of the neighbourhood area, including its population and role in providing services”. Counsel’s advice confirms this and that defining an IHR is a broad planning judgement and is not limited to site allocations.
- 4.8 OPDC therefore considers that it is appropriate for the IHR to take account of both Local Plan site allocations and relevant Development Capacity Study Update sites that contribute to the Local Plan’s total housing capacity and spatial strategy. These elements are part of the development plan; therefore, the draft plan would need to meet the requirement of NPPF PM5(2) in not resulting in less development than specified in other parts of the development plan for the Old Oak Neighbourhood Area. This would enable the draft plan to meet Basic Conditions (a) and (ea).
- 4.9 OPDC also does not agree that Basic Condition (ea) is satisfied because the wider Local Plan housing target may remain achievable across the OPDC area with the potential lower housing capacities proposed in the draft plan. The draft neighbourhood plan must be assessed by reference to whether making the plan would result in less housing being provided than if it were not made, including through its effect on sites within the Old Oak Neighbourhood Area.
- 4.10 The draft plan’s Initial Basic Conditions Statement argues that only 168 homes can legitimately be set as the housing requirement by OPDC, based on Local Plan site allocation 26. This includes the Lords Builders Merchants site but does not include Old Oak Cafe. Regardless of this error, OPDC does not agree with this position. OPDC has further comments regarding this including Lords Builders Merchants as a site allocation below in section 27.

Treatment of Development Capacity Study Update sites

- 4.11 OPDC acknowledges that the [Development Capacity Study Update 2021](#) (DCS) itself is not a development plan document. OPDC also acknowledges that the Old Oak West SPD and the OPDC Masterplan Framework are not development plan documents.
- 4.12 However, this does not mean that Development Capacity Study Update (DCS) sites are irrelevant to the IHR. The Government’s [How to assess and allocate sites for development toolkit](#) states that neighbourhood planning groups should use the local planning authority’s most recent Housing Land Availability Assessment or Housing and Economic Land Availability Assessment as a starting point, and that evidence will be needed to justify why sites assessed as deliverable or developable have not been included as site allocations in the neighbourhood plan. OPDC’s DCS 2021 states on pages 2, 6 and 7 that it fulfils the role of a Housing and Economic Land Availability Assessment and accordingly, the DCS underpins the housing targets within OPDC’s Local Plan.
- 4.13 OPDC considers that this supports the relevance of the [DCS Update 2021](#) for the neighbourhood plan’s site assessment and capacity work.

The IHR is not based on the Old Oak Masterplan Framework

- 4.14 For avoidance of doubt, OPDC is not relying on the Old Oak Masterplan Framework to underpin the IHR methodology or the minimum Indicative Housing Requirement for the Old Oak Neighbourhood Plan. This framework has been developed by OPDC’s Delivery Directorate and not by OPDC’s Planning Directorate in its role as Local Planning Authority. This clarification has been provided to the Forum in previous correspondence.

Recommended modifications

4.15 OPDC requests that the draft neighbourhood plan and initial Basic Conditions Statement are amended to:

- Recognise OPDC's IHR of a minimum of 510 new homes.
- Explain how the plan will meet or exceed the IHR.
- Provide clear information demonstrating how the plan delivers the minimum IHR.
- Remove statements suggesting that the IHR can only include Local Plan site allocations.

5. Strategic Environmental Assessment and Habitat Regulation Assessment

- 5.1 OPDC notes that [paragraphs 73 and 78 of Planning Practice Guidance on neighbourhood planning](#), together with the [Government's Screening Neighbourhood Plans for Strategic Environmental Assessment toolkit](#), require neighbourhood plans to be screened at an early stage. This is to determine whether they are likely to give rise to significant environmental effects requiring a Strategic Environmental Assessment (SEA) and whether Habitats Regulations Assessment (HRA) issues arise. The toolkit advises that screening should be undertaken before Regulation 14 consultation in the section entitled "When should a Neighbourhood Plan be screened?".
- 5.2 The Forum has not sought a screening opinion from OPDC in respect of SEA or HRA requirements prior to commencing the Regulation 14 consultation. This is confirmed in the initial Basic Conditions Statement which also includes a suggest outcome.

Recommended action

- 5.3 OPDC recommends that:
- To help demonstrate compliance with Basic Conditions (f) and (g), and to ensure that any environmental assessment requirements are identified at the earliest opportunity, OPDC encourages the Forum to engage with OPDC as soon as possible to seek a screening opinion and undertake any associated consultation with the statutory environmental bodies.
 - Update the submission version of the Basic Conditions Statement with the outcome of the screening activities.

6. A focused, clear and effective plan

Policy wording and supporting text

- 6.1 OPDC considers that the submission version of the neighbourhood plan should be more focused, proportionate and clearly structured. [PPG paragraph 41](#) sets out that neighbourhood plan policies "should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared".
- 6.2 The Government's neighbourhood planning [Keeping it Simple toolkit](#) advises that neighbourhood plans should focus on providing clear and deliverable planning policies rather than becoming long or unwieldy. The [Writing Planning Policies toolkit](#) also states that neighbourhood plan policies should be clear, relevant and deliverable, and that the "golden rule" is that policies should be clear, precise, positive, relevant and capable of being delivered.
- 6.3 OPDC considers that all policies and supporting text should be reviewed to ensure that the plan is concise, clear, positively written and capable of being applied consistently in development management decisions. Examples include, but are not limited to, policy OONA 1 regarding

restricting densities, policy OONA 2A regarding the Local Area of Special Character's role and policy OONA 3B regarding restricting heights guidance beyond development sites. The plan should clearly separate policy wording from supporting text and ensure that supporting text directly explains or justifies the proposed policies.

- 6.4 Material that does not assist in interpreting or applying the policies, should be removed, shortened or placed in a separate background paper unless it directly supports a planning policy. This would make the plan easier for the community, applicants, decision-makers and the examiner to understand and apply. Examples include, but are not limited to, extended commentary on the Old Oak Masterplan Framework, Compulsory Purchase Order and land assembly; history of Old Oak Neighbourhood Area boundary designations; histories of development and infrastructure proposals; and detailed descriptions of the five sub-areas.
- 6.5 The plan should also correct typographical errors, policy numbering errors and include paragraph numbering to assist navigation and referencing.
- 6.6 In light of the above, OPDC considers the plan is at risk of not meeting Basic Conditions (a) and (ea).

Site maps

- 6.7 The Government neighbourhood planning toolkit for '[How to assess and allocate sites for development](#)' requires that site allocations need to be clearly outlined with a site boundary on an Ordnance Survey map. This is set out on page 30. This requirement is also set out in paragraph 98 of the [Neighbourhood Planning section](#) of the PPG.
- 6.8 However, the site allocations in the draft plan do not provide a clear boundary. The site allocations utilise Google Earth images with approximate boundaries drawn on. This lack of clarity would result in OPDC, the community, landowners, developers and the examiner being unable to understand the site boundaries.
- 6.9 Currently there are errors on the following Google Earth extracts:
- Page 36 – incorrect Old Oak Neighbourhood Area boundary
 - Page 40 – incorrect Old Oak Neighbourhood Area boundary and erroneous markings
 - Page 51 – incorrect Old Oak Neighbourhood Area boundary, site boundaries do not align with those in OPDC's Development Capacity Study Update figure 5 or [Policies Map](#), and erroneous markings
 - Page 59 - incorrect Old Oak Neighbourhood Area boundary, site boundaries do not align with those in OPDC's Development Capacity Study Update figure 5 or [Policies Map](#), and erroneous markings
 - Page 68 - incorrect Old Oak Neighbourhood Area boundary
- 6.10 Therefore, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

- 6.11 OPDC recommends that the Forum should:
- Review the draft policies so that they are concise, clear, positively framed and capable of being applied consistently in development management decisions.
 - Review content of the plan so that material, that does not assist in interpreting or applying the policies, is removed, shortened or placed in a separate background paper unless it directly supports a planning policy.
 - Ensure the plan clearly separates policy wording from supporting text and that supporting text explains or justifies the proposed policies.

- Ensure that site allocations include appropriately detailed site boundary maps to meet requirements. OPDC would be happy to assist in providing Ordinance Survey basemaps for the Forum to utilise.

7. Old Oak Masterplan Framework references

- 7.1 The draft plan makes repeated reference to the Old Oak Masterplan Framework and incorrectly to the OPDC Masterplan Framework (examples include paragraphs 1.9, 1.16, 1.18, 2.8, 2.27 and 2.34). The Masterplan Framework is not a development plan document and was not prepared by OPDC as local planning authority as a planning policy document. OPDC considers it is appropriate for the draft plan to refer to it as contextual information in the introduction or policy supporting text, but it should not be treated as planning policy or used as the principal basis, justification or comparison with neighbourhood plan policies.

Recommended modifications

- 7.2 OPDC recommends that:
- Commentary on the Masterplan Framework is reduced and/or located in an appendix.
 - It is referred to as the Old Oak Masterplan Framework.

8. Chapters 1, 2 and 3: introductory, contextual and evidence material

- 8.1 OPDC considers that Chapters 1, 2 and 3 contain useful contextual material explaining the background to the neighbourhood area, the Forum's work and the issues that have informed the draft plan. However, as currently drafted, parts of these chapters read more like a background report, consultation history or evidence paper than the main body of a statutory neighbourhood plan.
- 8.2 The PPG paragraph 41 states that neighbourhood plans "should be concise, precise". Government's neighbourhood planning [Writing Planning Policies](#) toolkit advises that neighbourhood plans should be clear, focused and deliverable, and that detailed evidence can be held in supporting documents rather than included in full in the plan itself.
- 8.3 OPDC considers that the submission version should retain only the contextual material that is necessary to explain the plan's vision, objectives, policies and area-specific proposals. Detailed background material, commentary on OPDC documents, historical context and supporting evidence should be removed, shortened or relocated to an appendix or separate supporting document where it does not directly support a planning policy.
- 8.4 In light of the above, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

- 8.5 OPDC recommends that the Forum should:
- Review Chapters 1, 2 and 3 to ensure they are proportionate, focused and necessary.
 - Remove, shorten or relocate to an appendix or supporting document detailed background material that does not directly support the vision and objectives or assist in interpreting or applying policies.
 - Ensure any supporting documents or appendices are clearly referenced from the main plan where they are relied on as evidence.

9. Vision

- 9.1 OPDC supports the inclusion of a vision and objectives for the Old Oak Neighbourhood Area. However, we have a series of concerns set out below.

Vision

- 9.2 OPDC considers that parts of the vision are drafted in too restrictive a manner. References to “moderating OPDC development and regeneration proposals”, delivering “mid-rise housing” and setting densities by reference to the existing transport network could undermine OPDC’s Local Plan and the Mayor’s London Plan approach to design-led optimisation and thereby the delivery of development. Therefore, OPDC considers that this approach would not accord with Basic Condition (a) and the following NPPF policies and PPG guidance:
- NPPF Policy PM5(1) states that “neighbourhood plans allow local communities to plan positively for their areas by identifying and addressing community priorities that can be met or supported through the planning system”.
 - Policy PM5(2) states that “The contents of a neighbourhood plan should not result in less development than specified in other parts of the development plan which cover the same area”.
 - NPPF Policy L1 requires the development plan to “identify ways of accommodating as much as possible of the identified need for development in the area on previously developed land”.
 - The [PPG paragraph 3](#) confirms that “Neighbourhood planning provides the opportunity for communities to set out a positive vision for how they want their community to develop”.
- 9.3 The vision and objectives should therefore support a positive planning framework for the neighbourhood area and should not undermine planned growth in the wider development plan
- 9.4 OPDC also considers that the vision should reflect both existing and planned transport connectivity, rather than relying primarily on the current transport network. This would align with NPPF policies TR1 and TR3 and London Plan policy D3(A) approach to making effective use of existing and proposed transport infrastructure when considering growth, density and site capacity.
- 9.5 OPDC welcomes partnership working with Ealing Council and the other host boroughs. However, Ealing Council’s OPDC Legacy Framework and Community-led Regeneration Charter do not form part of the statutory planning framework for the area. OPDC’s engagement with developers is guided by OPDC’s own Statement of Community Involvement and relevant Community Engagement Strategy. References to Ealing Council documents may be included as contextual material where relevant but should not be presented as the basis for neighbourhood plan policy or as requirements for engagement with developers.
- 9.6 In light of the above, OPDC considers the plan is at risk of not meeting Basic Conditions (a) and (ea).

Recommended modifications

- 9.7 OPDC recommends that the Forum should:
- Revise the vision so that it is positively framed and supports the delivery of sustainable growth.
 - Ensure the vision supports delivery of OPDC’s Indicative Housing Requirement and does not imply a lower level of housing growth than provided for through the development plan.
 - Remove or amend wording that suggests the purpose of the plan is to “moderate” OPDC’s development and regeneration proposals.
 - Avoid presenting “mid-rise housing” as a fixed or predetermined development outcome unless this is supported by proportionate evidence.

- Refer to both existing and planned transport connectivity when discussing development capacities.
- Ensure references to Ealing Council's OPDC Legacy Framework and Community-led Regeneration Charter are presented as contextual information, rather than as the basis for neighbourhood plan policy or engagement requirements.

10. Objectives

Objective 2

10.1 The reference in objective 2 to establishing a neighbourhood centre at Atlas Road Junction does not align with the OPDC Local Plan town centre hierarchy which identifies the role of the wider Old Oak major town centre.

Recommended modification

10.2 OPDC recommends that this objective should refer to supporting a range of town centre uses at Atlas Junction as part of the wider Old Oak major town centre.

Objective 4

10.3 Objective 4's reference to densities being supported by the "existing transport network" does not align with NPPF policy TR1 or London Plan policy D3(A) regarding having regard to existing and planned/proposed transport infrastructure.

Recommended modification

10.4 OPDC recommends that references to proposed or planned connectivity should be included.

11. Housing density and site capacities: Policy OONA1 and site allocations OONA 2C, 2D, 2E, 3A and 4A.

Development capacity information and supporting growth

11.1 NPPF Policy PM5(1) states that neighbourhood plans allow local communities to plan positively for their areas. Policy PM5(2) states that neighbourhood plans should not result in less development than specified in other parts of the development plan which cover the same area. NPPF Policy L1 also requires the development plan, at the most appropriate level, to identify ways of accommodating as much as possible of the identified need for development in the area, including through site allocations and, where appropriate, minimum density standards. This is also reflected in NPPF Policy PM17. NPPF Policy TR1(1)(b) requires plans to "make effective use of existing or proposed transport infrastructure".

11.2 The [PPG paragraph 98](#) and the Government's [How to Assess and Allocate Sites for Development toolkit](#) require allocations in neighbourhood plans to provide an indication of the quantum of development appropriate for sites.

11.3 The Government's [Writing Planning Policies](#) and [How to address regeneration in your neighbourhood plan](#) toolkits set out guidance to ensure that neighbourhood plans do not promote less development than in the wider development plan.

11.4 London Plan policy D3(A) also requires site capacity to be optimised through a design-led approach, having regard to both existing and planned connectivity.

11.5 Local Plan Policy SP9(a) requires the optimisation of development with SP9(b) seeking to deliver high densities. The supporting text paragraph 3.78 identifies that, outside Strategic Industrial Locations, modelling indicates average residential densities of around 450 units per

hectare are likely to be required to achieve the homes and jobs targets, with an indicative density range of 300 to 600 units per hectare.

11.6 Draft policy OONA 1 and site allocations do not include development capacities and refer to using existing transport connectivity as a basis for proposed maximum densities. Policy OONA 1 states that housing densities of new residential development within the neighbourhood area should not exceed net residential densities of 350 units per hectare, except at locations achieving PTAL levels of 4 or above. Other specific maximum net residential densities are also set out the below site allocations policy text:

- OONA 2C – maximum 300 units per hectare
- OONA 2D – maximum 200 units per hectare
- OONA 2E – maximum 350 units per hectare
- OONA 3A – maximum 350 units per hectare
- OONA 4A – maximum 250 units per hectare

11.7 OPDC does not support policy OONA 1 or the density related portions of policies OONA 2C, 2D, 2E, 3A and 4A as currently drafted. OPDC's considers that OONA1 and the portions of the site allocations relating to densities and capacities would not meet Basic Conditions (a) and (ea) as they:

- do not provide a positive approach to development as referenced by NPPF policy PM5(1) due to the use of restrictive density limits.
- do not demonstrate to OPDC, the community, landowners, developers or the examiner whether the neighbourhood plan would deliver the Indicative Housing Requirement as they do not include site capacities. This approach does not enable stakeholders to understand whether individual allocations are deliverable or whether the plan would result in less development than specified in other parts of the development plan which cover the same area. This results in the draft plan not being able to demonstrate whether it meets NPPF policies PM5(2) and L1(1)(a)(b), [PPG paragraph 98](#) or the Government's [neighbourhood planning toolkits](#).
- do not demonstrate how they align with the London Plan policy D3 regarding optimising site capacity, or NPPF policy L1 on making effective use of land.
- Use existing transport connectivity as a basis for densities. This results in the draft plan not according with NPPF policy TR1, Government's neighbourhood planning toolkits and London Plan policy D3(A).
- are not justified by proportionate evidence as required by NPPF PM8(1). In particular:
 - The former London Plan Density Matrix no longer forms part of the development plan and has been superseded by the current London Plan's design-led approach and the draft London Plan which uses a design-led and Optimisation Framework approach. The draft London Plan [Optimisation Framework Methodology Report](#) also sets out the limitations of the Density Matrix.
 - The [draft Design and Placemaking PPG](#) has replaced the National Model Design Code and does not include indicative density ranges for locations.
 - The policies do not explain how the net residential density limits relate to the Local Plan density range of 300 to 600 units per hectare.

11.8 In light of the above, OPDC considers the plan is at risk of not meeting Basic Conditions (a) and (ea).

Net and gross density

11.9 Irrespective of OPDC's concerns regarding the lack of development capacities, the draft plan uses net residential densities to define the density limits. However, this cannot be directly

comparable with the OPDC Local Plan density range of 300 to 600 dwellings per hectare, which was prepared on a gross density basis. This is recommended by the Royal Institution of Chartered Surveyors. See section 4.2.1 of [Land measurement for planning and development purposes, global Professional Standard, 1st edition](#). OPDC previously informed the Forum of this issue via email on 30 April 2026 and recommended gross densities were utilised to enable comparisons to be made.

- 11.10 Because net residential density normally uses a smaller geographic area than gross density, a net density cap can be significantly more restrictive. For mixed-use regeneration sites, excluding land used for public realm, access, servicing, infrastructure, commercial uses, social infrastructure or open space can materially decrease the resulting housing capacity.
- 11.11 Alongside site capacities, the submission version should therefore explain how the Forum's proposed net density limits relate to the Local Plan density range and should provide evidence base for each allocated site.
- 11.12 Without this, OPDC considers that the approach to using net densities, and thereby not enabling capacities to be identified, alongside the lack of proportionate evidence base would risk the plan not meeting Basic Conditions (a) and (ea).

Recommended modifications

- 11.13 OPDC recommends that Policy OONA 1 and the density-related parts of Policies OONA 2C, 2D, 2E, 3A and 4A are deleted or substantially revised. Any revised policy or site allocation should be presented positively, clearly and concisely and seek to optimise housing delivery through a design-led approach, be supported by proportionate evidence, identify indicative development capacities for each allocation and demonstrate that the neighbourhood plan can meet at least the minimum Indicative Housing Requirement provided by OPDC.

12. Building heights: Policy OONA 2 and site allocations / policies OONA 2C, 2D, 2E, 2F, 3A, 3B and 4A.

- 12.1 OPDC supports the principle that development should respond appropriately to context, townscape, heritage and amenity. This aligns with OPDC Local Plan Policies SP9, D3, D4 and D5. OPDC's Local Plan also sets out building heights guidance through Policy SP9, Policy D4 and various Place policies. These policies were informed by the Local Plan evidence base and reflect a design-led approach to optimising site capacity, consistent with London Plan Policy D3.
- 12.2 London Plan Policy D9 requires development plans to identify suitable locations for tall buildings. The OPDC Local Plan has carried out this role for the OPDC area supported by evidence base.
- 12.3 Draft Policy OONA 2 recognises OONA Area 3 at Atlas Junction as appropriate for tall buildings and seeks to resist tall buildings elsewhere unless they are of a height, scale, mass and volume that is proportionate to their location and in keeping with the positive character of the local context.
- 12.4 OPDC does not support Policy OONA 2 and the heights related elements of policies OONA 2C, 2D, 2E, 2F, 3A, 3B and 4A as drafted. OPDC's Local Plan already identifies locations where tall buildings are appropriate in principle through Figure 3.15 and Policy SP9(b). Policy D4 provides further criteria for assessing tall buildings, including their relationship with sensitive locations, heritage assets, open spaces and existing residential communities.
- 12.5 Sub-area policies OONA 1B, 2C, 2D, 2E, 2F, 3A, 3B and 4A set out height guidance for specific sites and areas, including a combination of restrictive maximum heights and general guidance

relating to tall and large-scale buildings. However, these policies do not appear to be supported by a proportionate evidence base, as required by NPPF Policy PM8(1).

12.6 OPDC also notes that Policy OONA 1B relates to the Frogmore Industrial Estate which is outside the neighbourhood area.

12.7 OPDC's concerns are that OONA 2 and the portions of the above policies and site allocations relating to building heights:

- repeat matters already addressed by OPDC Local Plan Policies SP9 and D4 but do so in a more restrictive manner which do not reflect the positive approach required in NPPF Policies PM5(1), PM17 and L1.
- risk applying rigid height ceilings rather than a design-led approach to optimising site capacity, as required by London Plan Policy D3.
- do not demonstrate how the proposed height limits align with NPPF Policy L1 on making effective use of land.
- are not sufficiently justified by proportionate evidence as required by NPPF Policy PM8.
- relating to Policy OONA 1B, include guidance for development outside of the neighbourhood area which is prohibited by Section 38A(2) of the Planning and Compulsory Purchase Act 2004.

12.8 In particular, in the absence of evidence base, OPDC considers the heights guidance in the sub-area policies risks the ability for capacities to be optimised to meet the minimum capacities set out in the IHR when compared to the heights guidance set out in the Local Plan as compared below in table 2:

Table 2: Height policies comparison

Policy #	Draft plan site or area	Draft policy content extract	Local Plan site reference	Local Plan policy reference and content
2C	OPDC owned site at Goodhall Street	Maximum height of 8 storeys or 20.5m.	DCS site 54 (part of)	Policy P8(i)(iii) contributing to a variety of building heights that respond to public transport access and sensitive locations including delivering: generally lower heights directly adjacent to sensitive locations including the Grand Union Canal, Wormwood Scrubs and existing residential neighbourhoods of the Island Triangle, Shaftesbury Gardens, Midland Terrace, Wells House Road, Harley Road and East Acton.
2D	Lords Building Merchants	with building heights limited to 8 storeys or 23m.	Site allocation 26 (part of)	Policy P3(n)(i): contributing to a variety of building heights that support the functioning, designations, amenity and character of the canal and canalside spaces by: subject to the impact on the heritage, character, biodiversity and amenity of the Grand Union Canal within Channel Gate, delivering heights of generally 6 to 8 storeys fronting directly onto the Grand Union Canal with opportunities for tall buildings at key crossing points such as Channel

				Gate Street, Old Oak Lane and Scrubs Lane;
2E	Ursula Lapp	with provision for Tall Buildings on those parts of the site adjoining rail lines and furthest from the Old Oak Conservation Area boundary	DCS site 55	Policy P8(i)(iii) contributing to a variety of building heights that respond to public transport access and sensitive locations including delivering: generally lower heights directly adjacent to sensitive locations including the Grand Union Canal, Wormwood Scrubs and existing residential neighbourhoods of the Island Triangle, Shaftesbury Gardens, Midland Terrace, Wells House Road, Harley Road and East Acton.
2F	On both sides of Old Oak Lane within or adjacent to the Conservation Area boundary	To resist the introduction of large-scale and/or tall buildings on both sides of Old Oak Lane within or adjacent to the Conservation Area boundary unless these are justified with reference to Place Policies within the 2022 adopted OPDC Local Plan.	None	Policy P8(i)(iii) contributing to a variety of building heights that respond to public transport access and sensitive locations including delivering: generally lower heights directly adjacent to sensitive locations including the Grand Union Canal, Wormwood Scrubs and existing residential neighbourhoods of the Island Triangle, Shaftesbury Gardens, Midland Terrace, Wells House Road, Harley Road and East Acton.
3A	Site within the designated neighbourhood boundary at Victoria Terrace	a maximum height of 30m including any podium deck	(image relates to Old Oak Café and 8 Victoria Terrace)	Policy P8C1(g)(i) contributing to a variety of building heights including: on the eastern side of Old Oak Lane south of the Grand Union Canal, heights should be taller close to the canal, comparable to the existing height of The Collective, and should decrease in height to respond appropriately to the existing Victoria Terrace; SP9(b) Proposals should optimise development in a sustainable manner, that: delivers high densities and a range of building heights, including tall buildings in the locations identified in figure 3.15.
3B	On both sides of the stretch of Old Oak Lane between	To resist proposals for mixed use	None	Policy P8C1(g)(i) contributing to a variety of building heights including: on the eastern side of Old Oak Lane south of the Grand Union Canal, heights

	Atlas Junction and the Grand Union Canal	buildings above 6 storeys		should be taller close to the canal, comparable to the existing height of The Collective, and should decrease in height to respond appropriately to the existing Victoria Terrace; SP9(b) Proposals should optimise development in a sustainable manner, that: delivers high densities and a range of building heights, including tall buildings in the locations identified in figure 3.15.
4A	Midland Gate	a maximum height of 8 storeys or 23m including any podium deck	DCS site 30	Policy P8(i)(iii) contributing to a variety of building heights that respond to public transport access and sensitive locations including delivering: generally lower heights directly adjacent to sensitive locations including the Grand Union Canal, Wormwood Scrubs and existing residential neighbourhoods of the Island Triangle, Shaftesbury Gardens, Midland Terrace, Wells House Road, Harley Road and East Acton.

12.9 In light of the above, OPDC considers the plan is at risk of not meeting Basic Conditions (a) and (ea).

Recommended modifications

12.10 OPDC recommends that Policy OONA 2 and the height-related parts of Policies OONA 1B, 2C, 2D, 2E, 2F, 3A, 3B and 4A are deleted or substantially revised. Any revised policy should:

- avoid duplicating or narrowing the Local Plan's approach to tall buildings
- remove guidance for land outside the designated neighbourhood area
- include locally distinctive height guidance where this is supported by proportionate design-led evidence

13. Policy OONA 3. Affordable Housing

13.1 OPDC supports the objective of maximising affordable housing delivery and aligning affordable housing requirements with the London Plan and OPDC Local Plan.

13.2 However, OPDC does not support Policy OONA 3 as the matters addressed by the policy are already managed through the wider development plan. OPDC Local Plan Policy H2 applies to residential developments of 10 or more units or more than 1,000 sqm residential floorspace and sets out OPDC's affordable housing requirements. London Plan policies H4 to H7 also provide policies for affordable housing delivery, including threshold and viability requirements.

13.3 Policy OONA 3 does not introduce locally distinctive affordable housing requirements for the neighbourhood area. It repeats and signposts to existing development plan policy. As such, the policy may not accord with NPPF Policy PM6(1)(a) or the Government's neighbourhood [Writing Planning Policies](#) and [Keeping it Simple](#) toolkits, which expect plan-makers to avoid unnecessary duplication of policies.

- 13.4 The March 2026 Support for Housebuilding package and associated London Plan Guidance are relevant material considerations and may be signposted in supporting text where appropriate.
- 13.5 In light of the above, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

- 13.6 OPDC recommends that Policy OONA 3 be deleted. Text should instead signpost to the London Plan policies H4 to H7, Local Plan Policy H2 and any relevant London Plan Guidance, including the time-limited Support for Housebuilding London Plan Guidance.

14. Policy OONA 4. Purpose built student housing

- 14.1 OPDC recognises the Forum's concern regarding the concentration of Purpose Built Student Accommodation (PBSA) and co-living in and around North Acton. However, OPDC does not support Policy OONA 4 as drafted. OPDC is concerned that the draft policy is a broad restriction on student housing and co-living rather than as a positively framed, criteria-based policy.
- 14.2 The London Plan provides a policy framework for PBSA and large-scale purpose-built co-living through Policies H15 and H16. The Mayor's Purpose-built Student Accommodation London Plan Guidance also confirms that PBSA can help meet London's student housing needs, alleviate pressure on the wider private rented sector and support London's higher education sector, while ensuring schemes are balanced with other housing types and integrated into neighbourhoods.
- 14.3 The Local Plan contains specific policies for these housing types. Policy H10 addresses student housing and Policy H7 addresses co-living and shared housing. These policies seek to ensure that such accommodation contributes to mixed and balanced communities, avoids over-concentration, does not undermine conventional housing supply, is located appropriately and is supported by suitable management arrangements.
- 14.4 Policy OONA 4 does not identify a threshold for what would constitute over-concentration, does not provide spatial or site-specific evidence to justify a neighbourhood-wide restriction and does not explain why proposals that comply with the London Plan and OPDC Local Plan should nevertheless be resisted. As drafted, the policy may not accord with NPPF Policy PM5(1), which states that neighbourhood plans allow communities to plan positively for their areas, or NPPF Policy PM8(1), which requires plans to be underpinned by proportionate, relevant and up-to-date evidence.
- 14.5 The policy also risks duplicating existing development plan policies, particularly Local Plan Policies H7 and H10 and London Plan Policies H15 and H16. As such, it may not accord with NPPF Policy PM6(1)(a).
- 14.6 In light of the above, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

- 14.7 OPDC recommends that Policy OONA 4 be deleted unless proportionate evidence is provided to justify a locally specific policy approach. If retained, the policy should be substantially revised as a positively framed criteria-based policy that addresses locally evidenced issues of concentration, housing mix, management, amenity and integration with the wider community, while avoiding duplication of London Plan and Local Plan policies.

15. Policy OONA 5. Houses in Multiple Occupation

- 15.1 OPDC supports the principle of managing negative impacts associated with Houses in Multiple Occupation (HMO). However, OPDC does not support Policy OONA 5 as drafted.

- 15.2 OPDC is concerned that Policy OONA 5 is drafted as a restrictive policy rather than a positively framed criteria-based policy. It should be noted that OPDC's Article 4 Direction removes permitted development rights for changes of use from Class C3 dwellinghouses to Class C4 HMOs in the affected area, meaning that planning permission is required. It does not, in itself, establish a presumption against HMOs.
- 15.3 The matters identified in Policy OONA 5 are already addressed through development plan policies. Local Plan Policy D5 addresses residential amenity, including impacts relating to privacy, daylight, sunlight, air quality, noise and vibration. Policy EU6 addresses waste storage and waste management, Policy T4 addresses parking and transport impacts, Policy EU5 addresses noise and vibration and Policy H5 addresses the protection and quality of existing housing, including issues associated with conversions and cumulative impacts on amenity, parking and local services.
- 15.4 OPDC recognises that there may be a local case for managing HMO impacts within the neighbourhood area. However, the policy does not provide proportionate evidence to justify a restrictive approach, identify thresholds for harmful concentrations or explain how proposals would be assessed on their planning merits. OPDC is concerned that, as drafted, the policy may not accord with NPPF Policy PM5(1) or NPPF Policy PM8(1) regarding positive planning and evidence base.
- 15.5 The wording should also be revised to avoid implying that evidence would be "included in planning conditions". Planning conditions may secure mitigation measures but evidence should ordinarily be submitted as part of the planning application and assessed by the decision-maker.
- 15.6 In light of the above, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

- 15.7 OPDC recommends that Policy OONA 5 be amended to clarify that HMO proposals will be assessed on their planning merits, having regard to impacts on residential amenity, waste storage, parking, noise, overcrowding and the quality of accommodation. The policy should be supported by proportionate local evidence where it seeks to impose locally specific restrictions or thresholds.
- 15.8 Supporting text should also signpost to OPDC's HMO Article 4 Directions on OPDC's website and provide a clear link to [OPDC's Policies Map](#) which shows Article 4 Directions.

16. Policy OONA 6. Data Centres

- 16.1 OPDC recognises the Forum's concern about the cumulative impacts of data centres. London Plan policies E4 and E5 provide relevant guidance. Policy E4 confirms that emerging industrial-related sectors are appropriate uses within SIL and paragraph 6.4.1 clarifies that emerging industrial activities include data centres. Policy E4 supporting text paragraph 6.4.1. also provides locational guidance by noting that data centres are appropriate for land for industry, logistics and services which includes Strategic Industrial Locations (SIL). Policy E5 sets out that development within SIL should be supported where the uses proposed fall within the industrial-type activities set out in London Plan policy E4. The Old Oak Neighbourhood Area includes some very small areas of SIL.
- 16.2 However, OPDC does not support Policy OONA 6 as drafted. Policy OONA 6 applies to data centre proposals "within or proximate to the neighbourhood area". Neighbourhood plan policies should only relate to the development and use of land within the Old Oak Neighbourhood Area in accordance with Section 38A(2) of the Planning and Compulsory Purchase Act 2004. The policy should therefore not include guidance for land outside of the neighbourhood area. Contextual references to nearby data centres may be included in supporting text.

- 16.3 OPDC considers that the second paragraph of the policy and criteria A could be clarified to support their implementation in relation to demonstrating the appropriate use of land and electrical capacity. OPDC also considers that several criteria duplicate existing development plan policies which may not accord with NPPF Policy PM6(1). In particular:
- B: relating to carbon performance and operational emissions substantially overlaps with OPDC Local Plan Policies EU9 and EU10 and the London Plan carbon and energy framework policies SI2 and SI3, unless amended to address data-centre-specific matters such as waste heat recovery and connection to heat networks.
 - C: relating to building height, massing and integration with neighbouring residential areas is already addressed through OPDC Local Plan Policies SP9, D3, D4 and D5, including requirements relating to context, townscape, sensitive locations, amenity and building design.
 - E: relating to air quality, noise, vibration and water use is already addressed through OPDC Local Plan Policies D5, EU3, EU4 and EU5.
- 16.4 OPDC considers that criteria D may have potential to add locally distinctive guidance if the neighbourhood plan's evidence demonstrates a specific issue relating to the clustering of data centres. However, this element should be refined so that it is clearly linked to impacts that are not already fully addressed by the Local Plan, and it should be supported by proportionate evidence as required by NPPF Policy PM8(1).
- 16.5 OPDC is also concerned with criteria F, which requires a full Environmental Impact Assessment where a data centre is proposed close to existing residential streets. The requirement for EIA is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and associated screening procedures. A neighbourhood plan policy should not impose a blanket requirement for a full EIA solely on the basis of proximity to residential streets. The policy could instead refer to the need for proportionate environmental information, and where applicable screening under the EIA Regulations.
- 16.6 In light of the above, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

16.7 OPDC recommends that Policy OONA 6 is revised to:

- remove references to areas "proximate to" the neighbourhood area so that the policy applies only to development within the designated neighbourhood area
- amend the second paragraph to refer to data centres needing to demonstrate that the use would prejudice the delivery of employment-generating and mixed-use development
- amend criteria A to wording similar to: "Demonstrate that sufficient electricity capacity is available, or will be provided, without causing unacceptable constraints on existing or planned development"
- amend criteria B to focus on locally specific data centre matters where supported by evidence
- remove or substantially amend criteria C and E to avoid duplication with OPDC Local Plan Policies SP9, D3, D5, EU3, EU4 and EU5
- amend criteria D so that any reference to data centre clustering is clearly evidenced, locally specific and limited to matters not already addressed by the development plan
- delete criteria F and replace it with wording requiring proportionate environmental information, including EIA screening where required by the EIA Regulations
- acknowledge in supporting text that London Plan Policy E4 provides relevant locational guidance by identifying SIL and other industrial land as locations for industrial, logistics, utility and related functions which includes data centre

17. Policy OONA 6. Construction Activity

- 17.1 OPDC recognises the Forum's concerns regarding the impact of construction activity on existing residents. However, OPDC does not support Policy OONA 6 as the matters addressed by the policy are already managed through the wider development plan and separate regulatory regimes.
- 17.2 The London Plan requires development proposals to appropriately manage construction-related impacts through Policies T7 (Deliveries, servicing and construction), D14 (Noise), SI1 (Improving air quality) and T4 (Assessing and mitigating transport impacts). The Local Plan similarly addresses construction impacts through Policies SP10 (Integrated Delivery), T8 (Construction), EU4 (Air Quality) and EU5 (Noise and Vibration), including requirements relating to dust, emissions, noise, vibration, construction traffic, amenity impacts and construction management measures.
- 17.3 OPDC also acknowledges the Forum's comments regarding the role of the host boroughs in relation to some environmental health matters. However, this does not justify duplicating existing development plan policies within the neighbourhood plan. Policy OONA 6 does not introduce locally distinctive requirements beyond those already provided by the London Plan and OPDC Local Plan. Matters such as statutory nuisance, as defined by The Environmental Protection Act 1990, is a separate regulatory regime, and the NPPF Policy DM7(2) recognises that planning decisions should not seek to duplicate or extend controls imposed by separate regulatory regimes other than where there is a development plan policy in place applying optional technical standards for the development proposed (on which see Policy PM13).
- 17.4 As such, the policy may not accord with NPPF Policy PM6(1)(a) in relation to duplicating planning policies already in the wider development plan.
- 17.5 Therefore, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

- 17.6 OPDC recommends that Policy OONA 6 be deleted. Text should instead signpost to the relevant London Plan, OPDC Local Plan policies and other regulatory regimes relating to construction impacts, amenity, air quality, noise and vibration, construction logistics and construction management.

18. Policy OONA 7. Enabling Active Travel

- 18.1 OPDC supports the objective of encouraging active travel. However, OPDC does not support Policy OONA 7 as the matters addressed by the policy are already managed through the wider development plan.
- 18.2 The London Plan promotes walking and cycling through Policies T1 (Strategic approach to transport), T2 (Healthy Streets), T4 (Assessing and mitigating transport impacts) and T5 (Cycling).
- 18.3 The OPDC Local Plan similarly contains extensive policy requirements relating to active travel. Policy SP7 (Connecting People and Places) requires development to support walking and cycling through OPDC's Sustainable Transport Hierarchy, deliver Healthy Streets and provide new and enhanced walking and cycling connections. These objectives are further supported through policies in the Transport and Places Chapters.
- 18.4 As such, the policy may not accord with NPPF Policy PM6(1)(a) in relation to duplicating planning policies already in the wider development plan.
- 18.5 Therefore, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

18.6 OPDC recommends that Policy OONA 7 be deleted. Alternatively, the policy should be amended to include locally distinctive requirements supported by proportionate evidence.

19. Policy OONA 8. Healthy Air

19.1 OPDC supports the objective of improving air quality and protecting residents from the impacts of harmful pollutants. However, OPDC does not support Policy OONA 8 as the matters addressed by the policy are already managed through the wider development plan.

19.2 London Plan Policy SI1 (Improving Air Quality) requires development proposals to avoid further deterioration of existing poor air quality, be at least air quality neutral, and ensure that major development proposals are supported by an Air Quality Assessment. It also requires development to reduce emissions from demolition and construction in accordance with best practice guidance.

19.3 Local Plan Policy EU4 (Air Quality) requires major developments to be air quality neutral, submit Air Quality Assessments and provide mitigation measures where necessary. Policy T8 (Construction) also addresses construction-related emissions and dust and the wider construction logistics framework.

19.4 Policy OONA 8 does not introduce locally distinctive requirements or identify neighbourhood-specific air quality issues that are not already addressed through the development plan. As such, the policy may not accord with NPPF Policy PM6(1)(a) in relation to duplicating planning policies already in the wider development plan.

19.5 Therefore, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

19.6 OPDC recommends that Policy OONA 8 be deleted. Alternatively, the policy should be amended to include locally distinctive air quality requirements, projects or mitigation measures that are supported by proportionate evidence.

20. Chapter 5 OONA sub-area 1

20.1 OPDC considers that the Chapter 5 introduction text is too detailed for the main body of the neighbourhood plan. The Government's [Keeping it Simple](#) toolkit advises that neighbourhood plans should focus on clear and deliverable planning policies while [PPG Paragraph 41](#) requires that neighbourhood plans are concise and precise.

20.2 OPDC considers that some contextual material is useful, particularly the description of the Wesley Estate's character, its relationship with surrounding industrial uses and the role of Wesley Playing Fields as a valued local open space. However, parts of the chapter read more like detailed background evidence or a planning application chronology. Similarly, the planning history of Frogmore Industrial Estate and quotations from previous planning application material should be deleted, particularly as this is outside of the OONA boundary.

20.3 As such, the policy may not accord with PPG paragraph 41 or the Keeping it Simple toolkit.

20.4 Therefore, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

20.5 OPDC recommends that the Forum should:

- Retain concise contextual material that directly supports the proposed policies.

- Include a focused statement of the key planning issues affecting the sub-area.
- Provide a concise character summary of the sub-area.
- Remove, shorten or relocate to a background paper commentary on wider matters.

21. Policy OONA 1A

21.1 OPDC supports the principle of designating Wesley Playing Fields as Local Green Space, subject to the Forum demonstrating how the proposals accord with NPPF policy HC2, follow the guidance of the [Government's Local Green Spaces toolkit](#) and providing a precise mapped boundary.

21.2 Without the above, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

21.3 OPDC recommends that the Forum should:

- Provide evidence in accordance with NPPF policy HC2 and the [Government's Local Green Spaces toolkit](#).
- Show the designation on a clear map with a precise boundary.

22. Policy OONA 1B

22.1 OPDC recognises the Forum's concern regarding the relationship between the Wesley Estate and nearby industrial developments. OPDC also supports the principle that development should respond appropriately to residential amenity, townscape, context and sensitive edges between residential and industrial areas.

22.2 However, OPDC does not support Policy OONA 1B as drafted. The policy relates to Frogmore Industrial Estate, which lies outside the Old Oak Neighbourhood Area – see sections 12 and 16 for OPDC's concerns the related comments regarding proposing policies for areas outside of the neighbourhood area. OPDC also considers that the policy is not sufficiently clear or evidence-based.

22.3 Additionally, the matters addressed by Policy OONA 1B are already addressed through the wider development plan. OPDC Local Plan Policies SP9, D3, D4 and D5 address building height, massing, design quality, townscape, amenity and managing impacts on sensitive locations such as residential neighbourhoods.

22.4 As such, the policy may not accord with NPPF Policy PM6(1)(a) and PM8 in relation to duplicating planning policies already in the wider development plan and providing proportionate evidence base.

22.5 Therefore, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modification

22.6 OPDC recommends that Policy OONA 1B be deleted. If the Forum wishes to address impacts on the Wesley Estate from development within Old Oak Neighbourhood Area, any replacement policy should be positively worded, supported by proportionate evidence and relate to the neighbourhood area.

23. Chapter 6 OONA sub-area 2

23.1 OPDC considers that the Chapter 6 introduction text is too detailed for the main body of the neighbourhood plan. The Government's [Keeping it Simple](#) toolkit advises that neighbourhood

plans should focus on clear and deliverable planning policies while [PPG Paragraph 41](#) requires that neighbourhood plans are concise and precise.

23.2 OPDC considers that some contextual material is useful, particularly the description of the Railway Cottages/TITRA area, its Victorian workers' housing, the Old Oak Conservation Area designation, and the relationship between the cottages, Old Oak Lane, the canal and nearby development sites.

23.3 However, much of the chapter is considered too detailed for the main body of the plan. The sections on previous planning applications, Old Oak Masterplan Framework, Position Statement, land acquisition, site values, development procurement and criticism of OPDC read more like background evidence or representations on emerging proposals rather than concise plan text.

23.4 As such, the policy may not accord with PPG paragraph 41 or the Keeping it Simple toolkit.

23.5 Therefore, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

23.6 OPDC recommends that the Forum should:

- Retain concise contextual material that directly supports the proposed policies.
- Include a focused statement of the key planning issues affecting the sub-area.
- Provide a concise character summary of the sub-area.
- Remove, shorten or relocate to a background paper commentary on wider matters.

24. Policy OONA 2A

24.1 OPDC supports the principle of protecting the character and setting of the Old Oak Conservation Area. The area's heritage significance is already recognised through the Old Oak Conservation Area designation and OPDC's Local Heritage Listings. OPDC's Local Plan policy D7 provides policies for the conservation and enhancement of these heritage assets and their settings.

24.2 However, OPDC does not support Policy OONA 2A as drafted as:

- It seeks to create a Local Area of Special Character (LASC) designation. However, this is not supported by evidence demonstrating why the proposed LASC boundary has been chosen. This means it cannot demonstrate how it meets NPPF policy PM8.
- It lacks a clear boundary map.
- Parts of the proposed LASC appear to fall within the Old Oak Conservation Area. Therefore, the policy risks duplicating existing heritage protection and Local Plan policy D7. This puts it at risk of not according with NPPF PM6(1).
- The policy is not a positively framed criteria-based policy and does not define the relevant character, significance or design expectations.

24.3 In light of the above, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

24.4 OPDC recommends that Policy OONA 2A is deleted or revised. If retained, the policy should:

- include a map showing the boundary;
- provide proportionate evidence justifying the boundary and identifying the area's character and significance;
- be rewritten as a positive, criteria-based design policy.

25. Policy OONA 2B

- 25.1 OPDC supports the principle of designating the Stephenson Street Community Garden, known locally as the Woodland Garden, as Local Green Space, subject to the Forum demonstrating how the proposals accord with NPPF policy HC2, follow the guidance of the [Government's Local Green Spaces toolkit](#) and providing a precise mapped boundary.
- 25.2 In addition to the reference to Local Plan policy 4.141, policies P8(f)(ii) and P9(j)(ii) make reference to the space as Old Oak Community Gardens and support its expansion and enhancement.
- 25.3 Without the above, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

25.4 OPDC recommends that the Forum should:

- Provide evidence in accordance with NPPF policy HC2 and the [Government's Local Green Spaces toolkit](#).
- Show the designation on a clear map with a precise boundary.

26. Policy OONA 2C

- 26.1 OPDC supports the principle of the redevelopment of the Goodhall Street East site. OPDC also supports, in principle, the objective of retaining or reproviding locally valuable commercial uses where this is justified and compatible with comprehensive redevelopment.
- 26.2 However, OPDC does not support Policy OONA 2C as currently drafted. The policy introduces a maximum net residential density and maximum height without sufficient site-specific evidence and does not clearly identify the quantum of development proposed. OPDC's IHR note identifies a minimum capacity of 42 homes for Goodhall Street East, DCS site 54 (part of). As such, the policy may not accord with NPPF Policies PM5, PM8 and L1. See sections 11 and 12 for detailed density, capacity and heights comments.
- 26.3 The policy also appears internally inconsistent. The policy text refers to a maximum net residential density of 300 units per hectare and a maximum height of 8 storeys or 20.5m, whereas the reasoned justification refers to 350 units per hectare and 8 storeys or 23m.
- 26.4 OPDC also considers that the site boundary should be clarified. The policy refers to the "OPDC owned site at Goodhall Street", while the IHR Note refers to DCS site 54 part. The submission version should clearly show the allocation boundary on an appropriate policies map and explain how it relates to the DCS site boundary and the area used to calculate the IHR capacity. See section 6 regarding clarity of site maps.
- 26.5 In light of the above, OPDC considers the plan is at risk of not meeting Basic Conditions (a) and (ea).

Recommended modifications

26.6 OPDC recommends that the Forum should:

- Address the recommendations set out in sections 11 and 12.
- Confirm whether the policy relates to the whole OPDC-owned site, DCS site 54 part, or another defined area.
- Correct the inconsistency between the policy wording and reasoned justification regarding density and height.

- Clarify what is meant by “retaining existing commercial uses of demonstrable benefit to the local community” and how this would be assessed in decision-making.

27. Policy OONA 2D

- 27.1 OPDC supports the principle of the redevelopment of the Lords Builders Merchants site. The site forms part of the wider Local Plan Site Allocation 26, Channel Gate which is allocated for a minimum of 3,100 new homes and 10,700 sqm of commercial or industrial floorspace.
- 27.2 However, OPDC does not support Policy OONA 2D. Paragraph 44 of the [Neighbourhood Planning section](#) of the PPG states that “Neighbourhood plans should not re-allocate sites that are already allocated through these strategic plans”. NPPF policy PM6(1)(a) also states that “All plan-makers should, in preparing plans only address matters, and include policies, that are necessary and relevant to the plan being prepared, and that avoid unnecessary duplication of other parts of the development plan”. NPPF footnote 5 confirms neighbourhood forums are plan-makers. The Government’s [How to Assess and Allocate Sites for Development toolkit](#) on page 12 also states “If a site is already allocated in the local plan, it does not need to be re-allocated in the neighbourhood plan.”
- 27.3 In light of the above, OPDC considers the plan is at risk of not meeting Basic Conditions (a) and (ea).

Recommended modification

- 27.4 OPDC recommends that policy OONA 2D is deleted. Notwithstanding this recommendation, the IHR Note confirms that the site’s capacity contributes to the IHR for the Old Oak Neighbourhood Area. Therefore, reference to the site within the draft plan as part of Local Plan site allocation 26 should be made and support for its development to meet the minimum development capacities stated.

28. Policy OONA 2E

- 28.1 OPDC supports the principle of the redevelopment of the Ursula Lapp Estate. However, OPDC do not support Policy OONA 2E as currently drafted.
- 28.2 The policy introduces a maximum residential density without sufficient site-specific evidence and does not identify the quantum of development proposed. OPDC’s IHR Note identifies a minimum capacity of 250 homes for Ursula Lapp, DCS site 55. See sections 11 and 12 for detailed comments on density, capacity and heights.
- 28.3 The reasoned justification links the proposed density limit to current PTAL levels and states that this may be reviewed in successive versions of the neighbourhood plan if new transport infrastructure comes forward. However, the linking to current PTAL levels does not accord with NPPF Policy TR1 or London Plan Policy D3(A) which have regard to both existing and planned/proposed connectivity.
- 28.4 OPDC also notes that the policy supports provision for tall buildings on parts of the site adjoining rail lines and furthest from the Old Oak Conservation Area. However, this site is not within an area identified as appropriate for tall buildings in OPDC’s Local Plan and lacks evidence base for a new tall building area.
- 28.5 In light of the above, the policy may not accord with NPPF Policies PM5, PM8 and L1.
- 28.6 Therefore, OPDC considers the plan is at risk of not meeting Basic Conditions (a) and (ea).

Recommended modifications

28.7 OPDC recommends that the Forum should:

- Address the recommendations set out in sections 11 and 12.
- Update supporting text so that it considers existing and planned/proposed connectivity, rather than relying only on current PTAL levels.
- Support any new tall building locations with proportionate evidence.

29. Policy OONA 2F

29.1 OPDC supports the objective of conserving and enhancing the Old Oak Lane Conservation Area. However, OPDC does not support Policy OONA 2F as currently drafted.

29.2 The policy seeks to resist large-scale and/or tall buildings on both sides of Old Oak Lane within or adjacent to the Conservation Area. However, it is not clear whether the policy refers to the Old Oak Lane Conservation Area or the Canalside Conservation Area. Additionally, the term “large-scale” is not defined, which may make the policy difficult to apply in development management decisions.

29.3 The policy also risks duplicating existing proposed policies 2C, 2D and 2E which also provide heights guidance. Regardless of this internal repetition, OPDC considers the policy risks duplicating existing Local Plan policies SP9(a)(i)(ii), D3(a)(i)(ii), D7 and P8(i)(iii) which seek to appropriately respond to sensitive locations such as conservation areas and existing residential neighbourhoods. See section 11 for detailed comments on building heights. As such, the policy may not accord with NPPF Policy PM6(1)(a) in relation to duplicating planning policies already in the wider development plan.

29.4 OPDC also considers that the supporting text places inappropriate reliance on the Old Oak Masterplan Framework and 2026 Position Statement. These documents may be referred to as contextual background where relevant, but they do not form part of the development plan and should not be used as the principal justification for a neighbourhood plan policy.

29.5 In light of the above, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

29.6 OPDC recommends that the Forum should:

- Delete Policy OONA 2F or revise it as a positively framed heritage and design policy.
- If retained, define the area and conservation area to which the policy applies on a clear map.
- Address the recommendations set out in section 12.
- Coordinate with any amendments to Policy OONA 2A.
- Define the term “large-scale”.
- Remove reliance on the Old Oak Masterplan Framework and 2026 Position Statement as the principal justification for the policy.

30. Chapter 7 OONA sub-area 3

30.1 OPDC considers that the Chapter 7 introduction text is too detailed for the main body of the neighbourhood plan. The Government’s [Keeping it Simple](#) toolkit advises that neighbourhood plans should focus on clear and deliverable planning policies while [PPG Paragraph 41](#) requires that neighbourhood plans are concise and precise.

30.2 OPDC considers that some contextual material is useful, particularly explaining the role of Atlas Road Junction, including its potential to provide local services, active ground floor uses, community facilities and improved public realm for existing and future residents. OPDC also supports, in principle, the recognition that Atlas Junction has an important role within the wider

Old Oak major town centre and as a location where neighbourhood-level facilities could help meet day-to-day needs.

30.3 However, much of the text reads as background commentary, planning history, critique of OPDC documents, commentary on land acquisition, and discussion of matters outside the neighbourhood plan boundary. As such, the policy may not accord with PPG paragraph 41 or the Keeping it Simple toolkit.

30.4 Therefore, OPDC considers the plan is at risk of not meeting Basic Condition (a).

30.5 Additionally, OPDC considers that the draft wording should be amended where it refers to Atlas Junction as a “neighbourhood centre” or “neighbourhood hub”. The OPDC Local Plan identifies this area as part of the wider Old Oak major town centre. Any neighbourhood plan wording should align with that town centre hierarchy and refer to supporting a range of town centre and local service uses at Atlas Junction as part of the wider Old Oak major town centre.

Recommended modifications

30.6 OPDC recommends that the Forum should:

- Retain concise contextual material that directly supports the proposed policies.
- Include a focused statement of the key planning issues affecting the sub-area.
- Provide a concise character summary of the sub-area.
- Remove, shorten or relocate to a background paper commentary on wider matters.
- Amend references to Atlas Junction as a “neighbourhood centre” or “neighbourhood hub” so that they align with the OPDC Local Plan town centre hierarchy.

31. Policy OONA 3A

31.1 OPDC supports the principle of the redevelopment of the Old Oak Cafe, 2 Victoria Terrace site. However, OPDC does not support Policy OONA 3A as currently drafted.

31.2 The policy introduces a maximum net residential density and maximum height without sufficient site-specific evidence and does not identify the quantum of development proposed. OPDC’s IHR Note identifies a minimum capacity of 10 homes for Old Oak Cafe, 2 Victoria Terrace, DCS site 16. As such, the policy may not accord with NPPF Policies PM5, PM8 and L1. See sections 11 and 12 for detailed comments on density, capacity and heights.

31.3 In light of the above, OPDC considers the plan is at risk of not meeting Basic Conditions (a) and (ea).

Recommended modifications

31.4 OPDC recommends that the Forum should address the recommendations set out in sections 11 and 12.

32. Policy OONA 3B

32.1 OPDC supports, in principle, the delivery of active ground floor uses on both sides of Old Oak Lane. However, OPDC does not support Policy OONA 3B as currently drafted. The policy is unclear in its spatial application. As such, it risks duplicating draft policy OONA 3A and/or not being applicable to a specific site.

32.2 Additionally, OPDC has concerns regarding how the policy would accord with NPPF Policy PM5(1)(b), which requires neighbourhood plan policies to “address particular local issues, these

should relate to site-specific matters or, where appropriate, may cover wider issues". OPDC considers it would not be appropriate to include wider issues in the policy relating to height as:

- Local Plan policy P8C1(g)(i) already provides heights guidance for the east of Old Oak Lane within the Atlas Junction Cluster and repeating this would not accord with NPPF PM6(1)(c) or the [Government's neighbourhood planning toolkits](#) set out in Table 1. See section 12 for detailed comments on building heights.
- OPDC is not aware of The Collective Old Oak, on the west of Old Oak Lane, seeking to be redeveloped.

32.3 Additionally, the policy is not positively framed and is not supported by proportionate evidence. The reasoned justification relies heavily on criticism of the Old Oak Masterplan Framework and 2026 Position Statement, rather than proportionate evidence. As such, the policy may not accord with NPPF Policy PM5(1) or NPPF Policy PM8(1) regarding positive planning and providing a proportionate evidence base.

32.4 OPDC also considers that the phrase "until such time as there is evidence of a sustained increase in demand and footfall" is unclear, as it does not identify who would assess this evidence, what threshold would apply or how it would be used in decision-making.

32.5 Regarding Action 3.1, OPDC supports, in principle, the objective of improving access to the Grand Union Canal towpath.

32.6 In light of the above, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

32.7 OPDC recommends that the Forum should:

- Delete Policy OONA 3B or substantially revise it as a positively framed, evidence-based policy.
- If retained, clearly define the area to which the policy applies on a map.
- Explain why policy guidance is necessary for this location in the absence of identified development sites.
- Clarify the relationship between Policy OONA 3B and Policy OONA 3A to avoid internal inconsistency.
- Correct the typographical error at the start of the policy, "Tto".
- Address the recommendations set out in section 12.

33. Chapter 8 OONA sub-area 4

33.1 OPDC supports the inclusion of contextual material explaining the character of Midland Terrace and Shaftesbury Gardens, the relationship with surrounding railway and construction activity, and the role of Midland Gate and local open spaces within this sub-area.

33.2 However, OPDC considers that the chapter is currently too long and includes substantial material that is not appropriate for the main body of the neighbourhood plan. Much of the text reads as background evidence, planning history, commentary on previous transport proposals, commentary on the Old Oak Masterplan Framework and CPO-related matters rather than concise supporting text for the policies that follow.

33.3 OPDC considers that the chapter should be substantially shortened and refocused on matters that directly support Policies OONA 4A and 4B. This should include a concise character summary of Midland Terrace and Shaftesbury Gardens, a short overview of the Midland Gate site and a focused context section for the proposed Local Green Space designation at Cerebos Gardens and Midland Terrace Play Area.

Recommended modifications

33.4 OPDC recommends that the Forum should:

- Retain concise contextual material that directly supports the proposed policies.
- Include a focused statement of the key planning issues affecting the sub-area.
- Provide a concise character summary of the sub-area.
- Remove, shorten or relocate to a background paper commentary on wider matters.

34. Policy OONA 4A

- 34.1 OPDC supports the principle of development at Midland Gate, including housing and active ground floor uses where appropriate. OPDC also welcomes the clear map of the site. However, OPDC does not support Policy OONA 4A as currently drafted.
- 34.2 The policy introduces a maximum net residential density and maximum height without proportionate evidence and does not identify the quantum of development proposed. OPDC's IHR Note identifies a minimum capacity of 50 homes for Midland Gate, DCS site 30. As such, the policy may not accord with NPPF Policies PM5, PM8 and L1. See sections 11 and 12 for detailed comments on density, capacity and heights.
- 34.3 The reasoned justification links the proposed density limit to the site's current PTAL level and limited vehicle access from Midland Terrace. OPDC considers that the policy should have regard to both existing and planned connectivity.
- 34.4 In light of the above, OPDC considers the plan is at risk of not meeting Basic Conditions (a) and (ea).

Recommended modifications

34.5 OPDC recommends that the Forum should address the recommendations set out in sections 11 and 12.

35. Policy OONA 4B

- 35.1 OPDC supports, in principle, the designation of the Midland Road Terrace Playground, Victoria Gardens and Cerebos Gardens as Local Green Space, subject to the Forum demonstrating how the proposals accord with draft NPPF policy HC2, follow the guidance of the [Government's Local Green Spaces toolkit](#) and providing a precise mapped boundary.
- 35.2 OPDC notes that improvements have been prepared by OPDC and implemented in relation to the children's play area, which supports the view that these spaces have local amenity and community value.
- 35.3 Without the above, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

35.4 OPDC recommends that the Forum should:

- Provide evidence in accordance with draft NPPF policy HC2 and the [Government's Local Green Spaces toolkit](#).
- Show the designation on a clear map with a precise boundary.
- Amend naming to Midland Road Terrace Playground, Victoria Gardens and Cerebos Gardens.

36. Chapter 9 OONA sub-area 5

- 36.1 OPDC considers that the Chapter 9 introduction text is too detailed for the main body of the neighbourhood plan. The Government's [Keeping it Simple](#) toolkit advises that neighbourhood plans should focus on clear and deliverable planning policies while [PPG Paragraph 41](#) requires that neighbourhood plans are concise and precise.
- 36.2 OPDC considers that some contextual material is useful, particularly the overview of the character of Wells House Road, its constrained access arrangements and the relationship between the Wells House Road neighbourhood, Old Oak Common Station, the Adjacent Station Development site and wider planned connectivity improvements.
- 36.3 However, much of the text reads as background evidence, historical commentary, critique of HS2 and OPDC documents, commentary on previous masterplanning proposals, assumptions about market demand and discussion of matters that sit outside the direct scope of neighbourhood plan policy.
- 36.4 As such, the policy may not accord with PPG paragraph 41 or the Keeping it Simple toolkit.
- 36.5 Therefore, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

- 36.6 OPDC recommends that the Forum should:
- Retain concise contextual material that directly supports the proposed policies.
 - Include a focused statement of the key planning issues affecting the sub-area.
 - Provide a concise character summary of the sub-area.
 - Remove, shorten or relocate to a background paper commentary on wider matters.

37. Policy OONA 5A

- 37.1 OPDC supports, in principle, the safeguarding of land required to deliver the east-west pedestrian and cycle bridge where this is necessary to support delivery of the Local Plan policies.
- 37.2 However, OPDC does not support Policy OONA 5A as currently drafted. The policy seeks to safeguard sites needed to construct the east-west bridge in accordance with Local Plan Policy P7(m), but this matter is already addressed through the OPDC Local Plan. In particular, Local Plan Policies P7(f), P7(m), P7C2(d) and SP7(g) already provide the policy framework for the delivery of the bridge connection in relation to Old Oak Street.
- 37.3 As drafted, the policy therefore risks duplicating existing Local Plan policy rather than adding locally distinctive guidance. As such, the policy may not accord with NPPF Policy PM6(1)(a) in relation to duplicating or substantively restating planning policies already in the wider development plan.
- 37.4 OPDC also notes that the supporting text appears to question the timing and need for delivery of the bridge. If the policy is intended to safeguard land for infrastructure already identified in the Local Plan, it should be positively framed in accordance with NPPF Policy PM5(1) and should not introduce uncertainty about the principle of that infrastructure.
- 37.5 Relating to Action OONA 5A, the references to Old Oak Common Lane and retaining wall do not relate to the content of policy OONA 5A and therefore do not have a policy mechanism to be actioned.
- 37.6 In light of the above, OPDC considers the plan is at risk of not meeting Basic Condition (a).

Recommended modifications

37.7 OPDC recommends that the Forum should:

- Delete Policy OONA 5A, as the safeguarding and delivery of the east-west bridge is already addressed through Local Plan Policies P7(f), P7(m), P7C2(d) and SP7(g).
- Alternatively, if retained, substantially revise the policy so that it provides locally distinctive guidance.
- Remove wording in the reasoned justification that creates uncertainty about the principle or timing of infrastructure identified in the Local Plan.
- Amend Action OONA 5A to include material that relates to policy OONA 5A.

38. Basic Conditions concerns summary

38.1 OPDC considers that the draft plan is at significant risk of failing to meet the Basic Conditions unless it is substantially modified. This section summarises concerns by each Basic Condition related to the above sections. These matters should be addressed before submission to ensure that the plan is clear, legally robust, supported by proportionate evidence and capable of examination.

Basic Condition (a): having regard to national policy and guidance

38.2 OPDC considers that the draft plan does not currently demonstrate that it has had sufficient regard to national policies and advice contained in guidance issued by the Secretary of State.

38.3 In particular, the draft plan does not adequately reflect NPPF policies and relevant Planning Practice Guidance and the Government's neighbourhood planning toolkits in relation to:

- Planning positively for growth and development.
- Not promoting less development than is provided for in other parts of the development plan.
- Avoiding unnecessary duplication of policies and site allocations already contained in the development plan.
- Preparing clear, necessary, relevant and positively worded policies.
- Supporting policies with proportionate evidence.
- Providing clear site allocation information, including site boundaries and development capacities.
- Having regard to existing and planned transport infrastructure when considering site capacity and density.

Basic Condition (d): contributing to the achievement of sustainable development

38.4 OPDC considers that the draft plan does not currently demonstrate that it would contribute to the achievement of sustainable development.

38.5 The draft plan includes policies and site allocations that may restrict housing delivery, mixed-use growth and optimisation of development in an area identified for significant regeneration. The plan does not clearly demonstrate how its site allocations would deliver OPDC's Indicative Housing Requirement, nor does it provide sufficient site capacity evidence to show that proposed density and height limits would allow sustainable levels of development to come forward.

Basic Condition (ea): not resulting in less housing being provided

38.6 OPDC considers that the draft plan is at significant risk of failing to meet Basic Condition (ea).

38.7 OPDC has provided the Forum with an Indicative Housing Requirement of a minimum of 510 homes for the Old Oak Neighbourhood Area. The draft plan does not currently demonstrate how

this requirement would be met. In the absence of capacity information, OPDC does not consider that the draft plan can currently demonstrate that making the neighbourhood plan would not result in less housing being provided than if the plan were not made. The draft plan's position that the IHR should be limited to Local Plan site allocations is not accepted by OPDC, for the reasons set out earlier in this response.

38.8 OPDC also does not agree that Basic Condition (ea) is satisfied because the wider Local Plan housing target may remain achievable across the OPDC area. The relevant issue is whether making the neighbourhood plan would result in less housing being provided than if the plan were not made, including through its effect on sites within the Old Oak Neighbourhood Area. On the basis of the draft plan's proposed density limits, height restrictions and lack of site-specific capacity figures, OPDC considers that this has not been demonstrated.

38.9 In summary, the risk of failing Basic Condition (ea) arises because the draft plan:

- Does not recognise OPDC's minimum IHR of 510 homes.
- Does not demonstrate how the proposed policies would deliver at least the minimum capacities identified in OPDC's IHR Note.
- Does not identify the quantum of development proposed for its site allocations.
- Applies fixed net residential density caps without proportionate evidence.
- Applies restrictive height limits which often conflict with policies in the Local Plan and are without proportionate evidence.

Basic Condition (f): compatibility with relevant legal obligations

38.10 OPDC considers that the draft plan does not currently provide sufficient information to demonstrate compatibility with all relevant legal obligations.

38.11 In particular, the Forum has not sought a Strategic Environmental Assessment (SEA) or a Habitats Regulations Assessment (HRA) screening opinion from OPDC prior to commencing Regulation 14 consultation. The draft plan includes site allocations and policies that may have environmental implications, including in relation to heritage, townscape, air quality, transport, open space, biodiversity, amenity and development capacity.

38.12 The draft plan includes policies that seeks to apply to land outside of the neighbourhood area. Neighbourhood plan policies must relate to the development and use of land within the designated neighbourhood area. Policies should therefore not seek to impose development management requirements for land outside the Old Oak Neighbourhood Area.

38.13 Until SEA and HRA screening has been undertaken, and policies are amended to ensure they relate only to the Old Oak Neighbourhood Area, OPDC considers that the draft plan does not currently demonstrate compliance with Basic Condition (f).

Basic Condition (fa): Environmental Outcomes Report requirements

38.14 OPDC notes that Basic Condition (fa) relates to compliance with Environmental Outcomes Report requirements where applicable.

38.15 OPDC understands that the Environmental Outcomes Report regime is not yet fully in force for neighbourhood plans. However, the Forum should ensure that the submission version of the plan is updated to reflect any applicable environmental assessment requirements in force at the point of submission.

38.16 In the meantime, the Forum should seek a SEA and HRA screening from OPDC and ensure that the submission documents include either:

- A statement of reasons explaining why SEA is not required, or
- An Environmental Report, where SEA is required.

38.17 This will be necessary to demonstrate that the environmental implications of the plan have been properly considered.

Basic Condition (g): prescribed conditions and prescribed matters

38.18 OPDC considers that the draft plan does not currently provide sufficient information to demonstrate that all prescribed conditions and prescribed matters have been met.

38.19 In particular, OPDC is concerned that:

- Some policies are unclear, restrictive, imprecise or not positively framed.
- Several policies duplicate development plan policies.
- Some supporting text is not clearly related to the interpretation or justification of planning policies.
- Site allocations are not supported by clear boundaries, development capacities or evidence of suitability, availability and achievability.
- Local Green Space designations require further evidence and precise mapping.
- SEA and HRA screening has not yet been sought from OPDC.

39. Additional legal compliance requirements

39.1 In addition to the Basic Conditions, OPDC notes that the Levelling-up and Regeneration Act 2023 introduced further legal requirements relevant to neighbourhood plans. These are not Basic Conditions, but they are matters that are likely to be considered by the examiner when assessing whether the plan can proceed.

39.2 OPDC notes that the Forum's Initial Basic Conditions Statement recognises these additional requirements, including the need for the plan, so far as the Forum considers appropriate and having regard to the subject matter of the plan, to be designed to secure that the development and use of land in the neighbourhood area contributes to the mitigation of, and adaptation to, climate change. OPDC also notes the requirement for the plan to take account of any relevant Local Nature Recovery Strategy that relates to all or part of the neighbourhood area. For OPDC this is the [London Local Nature Recovery Strategy](#).

39.3 OPDC welcomes the Forum's acknowledgement that relevant considerations will be included in the submission version of the plan. However, the draft plan should be updated before submission to clearly demonstrate how these requirements have been addressed. This should include a concise explanation of how the plan's policies contribute to climate change mitigation and adaptation and how the plan has taken account of the relevant Local Nature Recovery Strategy, where applicable.

39.4 OPDC considers that this should be addressed in both the plan itself and the submitted Basic Conditions Statement.

40. Conclusion

40.1 OPDC welcomes the Forum's commitment to neighbourhood planning and appreciates the time and effort invested in preparing the draft Old Oak Neighbourhood Plan. We reiterate our commitment to working as closely and positively with the Forum as possible.

40.2 However, OPDC has significant concerns that the draft plan, as currently written, may not meet the Basic Conditions, NPPF requirements, Planning Practice Guidance or the Government's Neighbourhood Planning Toolkits. Therefore, the draft plan may require substantial modification.

40.3 OPDC encourages the Forum to address the matters raised in this response before submitting the plan under Regulation 15. OPDC remains willing to engage constructively with the Forum to

assist in preparing a submission version that can proceed through examination and, if appropriate, referendum.

- **Appendix 1 – KC advice 21 April 2026**
- **Appendix 2 – Indicative Housing Requirement for the Old Oak Neighbourhood Area - 23 June 2026 update**