



Old Oak Neighbourhood Forum

By email: oonforum@gmail.com

8 September 2026

Dear Old Oak Neighbourhood Forum

Regulation 14 Pre-Submission Consultation Draft Old Oak Neighbourhood Plan (July 2026)

I am writing on behalf of Old Oak and Park Royal Development Corporation's ('OPDC') Delivery Team in response to the Regulation 14 Pre-Submission Consultation draft Old Oak Neighbourhood Plan (July 2026) ('Draft Neighbourhood Plan').

OPDC is a Mayoral Development Corporation responsible for the regeneration of 650 hectares in west London, including land it has acquired, and is seeking to acquire at Old Oak to bring forward comprehensive regeneration of the area by creating a new urban district that will become a major new gateway between the capital and the rest of the country.

The Old Oak Masterplan Framework ('Masterplan Framework'), which was endorsed by OPDC's Board in November 2025 sets out our vision and proposals for the area which include the delivery of approximately 8,000 new homes, approximately 150,000–200,000 sqm of new commercial and employment space, new active travel routes and bridges, new parks and open spaces, a primary school and leisure, health and community provision. The Regeneration Proposals will strengthen physical and social connections between Old Oak and established communities in Harlesden, Park Royal and North Acton to create a strong sense of place built on the character of these surrounding areas.

The Draft Neighbourhood Plan can provide an opportunity to positively plan for the area to support the delivery of Old Oak and the Old Oak Neighbourhood Area. However, we strongly object to the premise for the overall vision within Chapter 4, and the policies that follow, which is founded upon an overarching objective of "moderating OPDC development and regeneration proposals", delivering "mid-rise housing" and inappropriately, only considers the existing, and not proposed, transport network in setting residential densities for the proposed site allocations. This would significantly impact on the deliverability of the scale of development and regeneration opportunity at Old Oak, which is identified in the Masterplan Framework and supported by the Local Plan and London Plan. We are, however, very much aligned with the objectives set out in Chapter 4 where they relate to improving connectivity and access to local amenities, enhancing public realm and open spaces. Detailed comments on the Draft Neighbourhood Plan are set out in Appendix 1 of this letter.

We have proactively engaged with local communities and stakeholders and have welcomed input and feedback which have shaped our vision and proposals for Old Oak. We look forward to continuing working with local communities and stakeholders, including the Old Oak Neighbourhood Forum, as we progress plans for Old Oak and to realise the regeneration benefits for the area.

Yours Faithfully

A handwritten signature in black ink, appearing to read 'MB', with a stylized flourish at the end.

Marianne Brook
Development Director
Delivery

Cc Matthew Carpen, OPDC Chief Executive
 Gareth Blacker, Executive Director Delivery (OPDC Delivery)
 Irene Man, Assistant Director of Development (OPDC Delivery)
 Emma Wiliamson, Director of Planning (OPDC Local Planning Authority)

Appendix 1 – OPDC Delivery comments on the Draft Old Oak Neighbourhood Plan (Julye 2026)

The following sets out comments made by the Old Oak and Park Royal Development Corporation's ('OPDC') Delivery Team in response to the Regulation 14 Pre-Submission Consultation draft Old Oak Neighbourhood Plan (July 2026) ('Draft Neighbourhood Plan').

Old Oak Masterplan Framework

The supporting text to the Draft Neighbourhood Plan makes a number of references to the Old Oak Masterplan Framework and its planning status. In particular, it is stated that "OPDC's Masterplan Framework has not been prepared, consulted on or 'examined' as a development plan document" and that "the Forum believes that it should be given limited 'material weight' in future planning decisions".

We would like to take the opportunity to re-state that the Old Oak Masterplan Framework ('Masterplan Framework') is not intended to, and does not, form part of the Development Plan. The Masterplan Framework has been subject to community and stakeholder engagement, including with the Local Planning Authority ('LPA'). The Masterplan Framework has also been prepared in the context of the statutory Development Plan, particularly in relation to the Local Plan as well as the Old Oak West Supplementary Development Plan ('SPD') (noting that the latter, while not part of the statutory development plan, remains a material consideration) and sets out the basis for proposed policy deviations.

The Masterplan Framework was considered by the OPDC Planning Committee on 13th November 2025 and endorsed by the OPDC Board on 20th November 2025. In its report to the Planning Committee, the LPA concluded that it considers the Framework is capable of being a material consideration in the context of future planning applications, however, the weight to be attributed to it will be determined only when respective applications come forward and will be at the discretion of the LPA'.

The Masterplan Framework sets out the vision for Old Oak and describes the site-wide spatial principles and development parameters for the coordinated delivery of future development proposals which will be brought forward by OPDC and its future development partner. It is therefore not appropriate at this stage, for the Draft Neighbourhood Plan to comment on the material weight to be given to the Masterplan Framework which will be for the LPA as decision maker to determine at the time of future planning applications.

Developer Partner Procurement

The Draft Neighbourhood Plan includes a number of references to information provided as part of OPDC's developer partner procurement process which is currently live. It is not considered appropriate to include these within the Draft Neighbourhood Plan or supporting text and we request that these are deleted.

Chapter 4 – The overall vision for the Old Oak Neighbourhood Plan

We strongly object to the premise for the overall vision within Chapter 4, and the policies that follow, which is founded upon an overarching objective of “moderating OPDC development and regeneration proposals”, delivering “mid-rise housing” and inappropriately, only considers the existing, and not proposed, transport network in setting residential densities for the proposed site allocations. This would significantly impact on the deliverability of the scale of development and regeneration opportunity at Old Oak, which is identified in the Masterplan Framework and supported by the Local Plan and London Plan. We are, however, very much aligned with the objectives set out in chapter 4 where they relate to improving connectivity and access to local amenities, enhancing public realm and open spaces.

The proposed vision does not accord with the National Planning Policy Framework (NPPF) (2026) policies for plan-making policies, and in particular, Policy L1 which requires development plans to “identify ways of accommodating as much as possible of the development required in the area, including through effective use of previously developed land”, and Policy PM5(2) which states that “neighbourhood plans should not promote less development than provided for in other parts of the development plan for the area”.

It is also considered that the proposed vision should align with both the NPPF, London Plan and Local Plan and be future-focussed and consider both existing and planned transport infrastructure and connectivity at Old Oak.

Draft policies applying to OONA Areas 1-5

Policy OONA 1 - Housing density

OPDC objects to draft Policy OONA 1 which seeks to limit residential densities to 350 units/hectare other than at locations achieving PTAL levels of 4 or above. The maximum density proposed is based on the existing transport connectivity of the area, as opposed to planned infrastructure as is supported by the NPPF, London Plan and Local Plan. There appears to be no capacities evidence informing the proposed maximum residential densities and we would expect design and capacity studies to justify and evidence these proposals. Nevertheless, the approach to densities set out within the Draft Neighbourhood Plan would significantly impact on OPDC’s ability to deliver the scale of development and regeneration benefits set out in the Masterplan Framework which would support the delivery of the housing targets set out in the London Plan and Local Plan, including affordable housing.

The use of net densities without any evidence and background information results in it being impossible to make direct comparison with gross densities. Furthermore, this makes it difficult to know how they relate and compare to the OPDC Local Plan density range of 300 to 600 dwellings per hectare, which is based on gross densities, although it is noted that net densities will be significantly more restrictive than gross densities.

For the same reasons, our concern also applies to the maximum net residential densities set out in the following site allocations, to which OPDC objects:

- 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

Policy OONA 2 - Building heights

OPDC objects to the approach to tall buildings set out in draft Policy OONA 2 which seeks to resist tall buildings outside Atlas Junction (OONA Area 3). We agree that tall buildings should be appropriately located and respond to their context which is the approach taken in the Masterplan Framework, however, it is unclear whether the proposed restriction on heights has been informed by any design and capacity studies.

The Masterplan Framework and the Old Oak Illustrative Masterplan propose a small number of tall buildings that exceed the current policy in terms of heights and locations. As is set out in the Masterplan Framework, this has been supported by a sitewide strategy that has sought to manage the total number of tall buildings across the masterplan area. The strategy proposes to locate tall buildings in the Old Oak Town Centre, Neighbourhood Centre, and close to public transport, with lower-rise buildings at the Canalside Neighbourhood and using tall buildings to mark arrival points and long-distance views, including the Old Oak Common Station, North Acton and Harlesden and the proposed parks. This approach has enabled lower heights and reduced massing elsewhere in response to local context and to provide more open space, limit overshadowing of the new parks and open spaces, provide more space between buildings to improve overlooking and daylight access, and to respond to sensitive adjacencies.

OPDC therefore objects to draft Policy OONA 2 which would have a significant impact on OPDC's ability to deliver the scale of development and regeneration benefits set out in the Masterplan Framework which would support the delivery of housing targets set out in the London Plan and Local Plan, including affordable housing. On the same basis, OPDC objects to Sub-area policies OONA 1B, 2C, 2D, 2E, 2F, 3A, 3B and 4A which restrict building heights and tall buildings for specific sites and areas without any evidence to on design or capacity testing,

Housing typologies and tenures

The Draft Neighbourhood Plan includes the following policies relating to housing tenure and typologies: Policy OONA 3 - Affordable Housing, Policy OONA 4 - Purpose Built Student Housing (OONA 4) and Policy OONA 5 - Houses in Multiple Occupation.

Whilst we note the concerns regarding Purpose Built Student Accommodation ('PBSA') and Homes in Multiple Occupation ('HMOs'), it is also recognised that both types of housing contribute to meeting housing needs and therefore it is not appropriate to include such a broad restriction on these typologies. We therefore object to the draft policies.

It should be recognised that Old Oak must offer homes for a broad range of London's population, including student, co-living and entry level housing, keyworker homes, those seeking to up-size, alongside family housing, later living, supported/specialist when appropriate, and traditional and emerging affordable housing tenures. Diversity in typologies enables mixed communities as well as supports the workforce for the economy envisaged at Old Oak and Park Royal.

Chapter 6 OONA Sub Area 2 The Railway Cottages/TITRA Area

The sub area boundary is shown on a Google Earth image which is also incomplete and unclear. OPDC therefore requests that the sub area boundary is provided on an Ordnance Survey plan as required by government guidance.

OONA Policy 2C: For the reasons set out above under Policy OONA 1 - Housing density and Policy OONA 2 - Building heights, OPDC objects to OONA Policy 2C which seeks to limit residential densities to a maximum of 300 units/hectare and heights to 8m (20.5m) with no clear evidence base. The approach to densities and heights would significantly impact on OPDC's ability to deliver the scale of development and regeneration benefits set out in the Masterplan Framework which is also supported by the Local Plan and London Plan

We also note that the density and heights referred to in the draft policy differ to those stated in the reasoned justification which refer to a maximum of 350 units/hectare and 8 storeys or 23m instead.

Whilst we are supportive of any commercial uses being of benefit to the local community, it is also important that such uses should be financially viable and support the economy and regeneration of the area.

OONA Policy 2D: For the reasons set out above under Policy OONA 1 - Housing density and Policy OONA 2 - Building heights, OPDC objects to OONA Policy 2D and requests clarification of the supporting evidence base for the proposed maximum residential density and building height.

OONA Policy 2E: For the reasons set out above under Policy OONA 1 - Housing density, and Policy OONA 2 – Building Heights, OPDC objects to OONA Policy 2E which seeks to limit residential densities to a maximum of 350 units/hectare. The approach to densities and heights would significantly impact on OPDC's ability to deliver the scale of development and regeneration benefits set out in the Masterplan Framework.

OONA Policy 2F: OPDC objects to the proposed policy which resists large-scale and/or tall buildings on both sides of Old Oak Lane within or adjacent to the Conservation Area. It is unclear whether the draft policy is supported by any design-led evidence or a capacity study has been undertaken to inform this blanket restriction. For the reasons set out above under draft Policy OONA 1 - Housing density and Policy OONA 2 - Building heights, the approach would significantly impact on OPDC's ability to deliver the scale of development and regeneration benefits set out in the Masterplan Framework.

Chapter 7 OONA sub-area 3

The sub area boundary is shown on a Google Earth image which is also incomplete and unclear. OPDC therefore requests that the sub area boundary is provided on an Ordnance Survey plan as required by government guidance.

OPDC welcomes the Draft Neighbourhood Plan's support for the Masterplan Framework's proposed neighbourhood centre within the Canalside Neighbourhood.

Policy OONA 3A: For the reasons set out above under Policy OONA 1 - Housing density and Policy OONA 2 - Building heights, OPDC objects to Policy OONA 3A which seeks to limit residential densities to a maximum of 350 units/hectare and heights to 30m (including podium deck) with no clear evidence base. The approach to densities and heights would significantly impact on OPDC's ability to deliver the scale of development and regeneration benefits set out in the Masterplan Framework.

Policy OONA 3B: OPDC is concerned that the draft policy does not reflect 'The Old Oak Mile' which is one of the Masterplan Framework's spatial principles underpinning the Old Oak development. For the reasons set out above under Policy OONA 2 - Building heights, OPDC objects to the blanket restriction on any development above 6 storeys without any supporting evidence base. The approach to heights would significantly impact on OPDC's ability to deliver the scale of development and regeneration benefits set out in the Masterplan Framework.

Chapter 8 OONA sub-area 4

The sub area boundary is shown on a Google Earth image which is also incomplete and unclear. OPDC therefore requests that the sub area boundary is provided on an Ordnance Survey plan as required by government guidance.

Policy OONA 4A: For the reasons set out above under Policy OONA 1 - Housing density and Policy OONA 2 - Building heights, OPDC objects to Policy OONA 4A which seeks to limit residential densities to a maximum of 250 units/hectare and heights to 23m (including podium deck) with no clear evidence base. The approach to densities and heights would significantly impact on OPDC's ability to deliver the scale of development and regeneration benefits set out in the Masterplan Framework.

Chapter 9 OONA sub-area 5

The sub area boundary is shown on a Google Earth image which is also incomplete and unclear. OPDC therefore requests that the sub area boundary is provided on an Ordnance Survey plan as required by government guidance.

OONA Policy 5A: Whilst OPDC is supportive of the proposed east-west pedestrian and cycle bridge, which is identified in the Masterplan Framework, we query the necessity of this policy which duplicates existing Local Plan policies