

2026 DRAFT LONDON PLAN

RESPONSE FROM THE OLD OAK NEIGHBOURHOOD FORUM AND ST QUINTIN AND WOODLANDS NEIGHBOURHOOD FORUM

Background

This joint representation comes from two neighbourhood forums in West London which have been working together since 2015 in response to the plans and decisions of the Old Oak and Park Royal Development Corporation (OPDC). It focuses on those parts of the Draft London Plan which propose policies for the Old Oak half of the Old Oak and Park Royal Opportunity Area and (to a lesser extent) the Kensal Canalside Opportunity Area.

The two forums previously made a joint response to [the consultation on *Towards a New London Plan*](#).

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

Planning context

The Old Oak and Park Royal OA, as one of the largest in London, has in our view become an example of flaws in strategic planning by successive Mayors and the GLA.

Responsibility for the present position lies mainly with the UK's worst ever failure of infrastructure delivery in the form of the **HS2 project**. We consider that the OPDC as the Mayoral Development Corporation for the Opportunity Area since 2015 should bear its share, given the slow realisation of new homes and employment opportunities on the ground.

In the Draft London Plan, both these parts of west London are defined as **Brownfield First Opportunity Areas**. They are geographically contiguous but separated since the 1870s by the West London Line (now the Mildmay Line). This line forms the boundary between North Kensington and North Hammersmith.

The '**strategic growth visions**' for these two Opportunity Areas place **Kensal Canalside** in the 'nascent' category (despite one major scheme consented and awaiting referral from the RBKC to the Mayor and a second pending RBKC's determination of a revised July 2026 application). **The Old Oak and Park Royal OA** was categorised in June 2025 as 'underway' and in the Draft London Plan as 'mature'. This is commented on in the section on Annex E of this submission.

With Old Oak Common station originally due to be in operation by 2026, and now with a timeline of 2036-39 (which may or may not hold), the concept of this rail interchange as a ‘catalyst’ for world-class urban renewal has fallen apart.

A set of poor decisions by OPDC (including lack of transparency on MHCLG funding conditions and over-ambitious CPO proposals) led to £250m of Housing Infrastructure Funding being foregone at a crucial stage in 2018/9. This was a period when good progress could have been made on delivery of new housing at Old Oak North.

The OPDC’s revised delivery proposals for Old Oak West now rely on implementation of a non-statutory Masterplan, pending adoption of a new Local Plan due for December 2029. We see no evidence of local public support for this Masterplan, the contents of which involve siting high-density high-rise towers on a series of development sites which OPDC has acquired at high land values in the last two years. In some instances these land values have reflected well advanced private sector development proposals or planning consents previously granted by the OPDC’s Planning Committee.

Our specific suggestions on policy wording are set out at the end of each section on an individual Draft Policy. We have commented only on a selection of policies in the Draft Plan.

MBUL 1 Spatial Strategy

The Forum supports the overall thrust of this policy and in particular the principle that development and infrastructure should be ‘phased and co-ordinated’. But we consider the wording needs some refinement for effectiveness to avoid risks of what has happened in the Old Oak and Park Royal OA (and elsewhere in London) where potential new transport infrastructure is either not funded or where delivery is very seriously delayed, as has become an extreme case with the HS2 project.

The delays in the opening of Old Oak Common station from 2026 to 2036-39 have led to premature planning consents by the OPDC. These have left incoming occupants of high-density car-free housing stranded at locations where public transport access will remain poor for an unanticipated decade or more and where journeys to work and taking children to school become unforeseen and unacceptable challenges.

The MDC was warned of this risk in objections to major developments at Oaklands Rise and Mitre Bridge (Scrubs Lane) in 2016-2018 but chose to ignore these warnings. Our perception has been that the organisational culture within a high-profile MDC, intent on demonstrating progress and delivery on the ground, has led to poor decisions in the past. The Housing Infrastructure sags of 2018/9 is an example. We see this as an inherent danger of the MDC model.

Over the years we have urged the London Assembly to review OPDC plans and programmes in greater depth. The Planning and Regeneration Committee are due to hold two sessions in early 2027.

Looking across these contiguous Opportunity Areas, we see growing evidence of a missed opportunity for the Mayor and Boroughs to have undertaken joint spatial planning and co-ordinated development activity on both. North Kensington was not seen as potential part of the MDC area in the discussions and proposals for a Mayoral Development Corporation in 2012-14.

The two OAs share common characteristics. Both involve large tracts of former industrial and railway land. Existing rail lines and the Grand Union Canal create major barriers to movement, explaining the lack of any intensive development in the past century. While the Old Oak part of the OA includes several residential settlements, the area's population remain low. The Kensal Canalside OA has an even smaller resident population, a very limited existing road network and land that requires extensive decontamination and remediation.

Road connectivity within these OAs is acknowledged to be fragmented and limited. The street network at Old Oak has never developed into a coherent and interconnected 'walkable neighbourhood'.

Other parts of this submission comment on whether some rethinking could potentially emerge as a way forward applicable to both Old Oak and to Kensal Canalside. While plans have advanced towards implementation in both OAs, delivery of these remains uncertain in the 2026/7 London housing market.

Our main suggestion on MBUL 1 is that this should include caveats prompting LPAs to move swiftly in reviewing and rethinking their spatial plans as and when circumstances change. Such change is almost inevitable when large-scale regeneration plans are being progressed in a city with the complexities of London. The OPDC has had to change course massively on one occasion (following the intervention of the Planning Inspector in 2018/9 on the Local Plan as submitted for examination). The London Legacy Development Corporation encountered its own setbacks and appears to have moved more proactively and nimbly at such times¹.

OPDC has had to work in parallel to a national infrastructure project, in the form of HS2, which has gone wildly off track. In the past three years, when the worst of HS2's failings have emerged, the Corporation has proved reluctant to consider a pause and the reassessment of options. We have concerns that this may re-occur in 2027/8 in a period of severe difficulty for London's development market.

¹ Evidence from Lyn Garner, Chief Executive LLDC to the London Assembly Planning and Regeneration Committee Wednesday 23 November 2022

MBUL 1 Spatial Strategy: Suggested policy rewording

A. New housing and employment development and infrastructure investment should be located, phased, coordinated **(including revisiting phasing when contexts change)**, and designed to:

(2) achieve intensification of land use across London in a way that contributes to meeting London's different needs, and supports places to renew and evolve, responding **reactively as well as** positively to London's place assets, and building on the **demonstrated and evidenced** success of economic clusters

(3) ensure **well-timed** infrastructure sufficiency in respect of growth and wider good growth needs, with particular reference to the strategic infrastructure requirements set out in B(5)

B(1) through site allocations and review of designations, give priority to and realise the full potential of the growth corridors, the Central Activities Zone (CAZ) and the Northern Isle of Dogs (NIOD), BFOAs and other identified BLGs within the existing urban area, addressing their specific strategic opportunity where **and when** relevant, accommodating a significant proportion of required new homes and maintaining a reservoir of well-located employment land

B(5) benefit overall strategic site delivery which may include agreeing exceptions to the prioritisation in (4) – particularly in early-scheme phases in relation to the diversity of housing mix and delivery model **and where the transport infrastructure context changes**.

B(8) facilitate delivery of this strategy through policies and site allocations that optimise value generation and delivery through phasing, use, layout, housing mix and other expectations (including Community Infrastructure Levy (CIL) rates) that are carefully evaluated for their cumulative delivery impact **and are revisited proactively when planning and infrastructure contexts change**.

Policy MBUL 2 Optimising the use of land and site capacity

Our Forum **strongly supports** the return to the London Plan of a policy which addresses the nexus between housing density, 'connectivity' and access to public transport in clear and numerical terms.

We are amongst those Londoners who believe that the demise of the 2016 London Plan Policy 3.4 and the associated Density Matrix, and the era of a 'design-led' approach to building heights was exploited by commercial developers for anything but 'design-led' reasons. Urbanists, architects and planning authorities in many of Europe's major cities did not follow the 'build upwards' mantra of the early 21st century London.

Major urban extensions in Paris, Lyon, Amsterdam, Antwerp, and Vienna are viewed by our members as better planned than has been the case for OPDC's stewardship since 2015 of North Acton, or the vision proposed in the current OPDC Masterplan Framework.

Our Forum also **welcomes** the Draft London Plan switch to measuring density in habitable rooms/hectare rather than units per hectare, as giving more encouragement for building family homes rather than studios and 1 bed apartments.

Our reservations on Draft Policy MBUL2, and our suggestions below on refined policy wording, relate to the potential **effectiveness** of the policy and particularly on its reliance on the initial version of the new Sustainable Access Measure (SAM).

As a tool for strategic spatial planning, the SAM model is an advance on the long established PTAL measure. We also agree with the view in the Draft Local Plan that the new DfT Connectivity tool is not sufficiently calibrated for a London context.

Our concern over the SAM model as currently available on the London Datastore is that its output does not reflect existing transport infrastructure. Having checked with the London Plan team, we have had confirmation that SAM as published at <https://apps.london.gov.uk/planning/> and at <https://data.london.gov.uk/dataset/london-plan-evidence-mbul-2j8nl> *shows transport improvements committed to be delivered by 2041 as was assumed at August 2025. And that this includes Old Oak Common station being operational by the present official 2036-39 timeframe.*

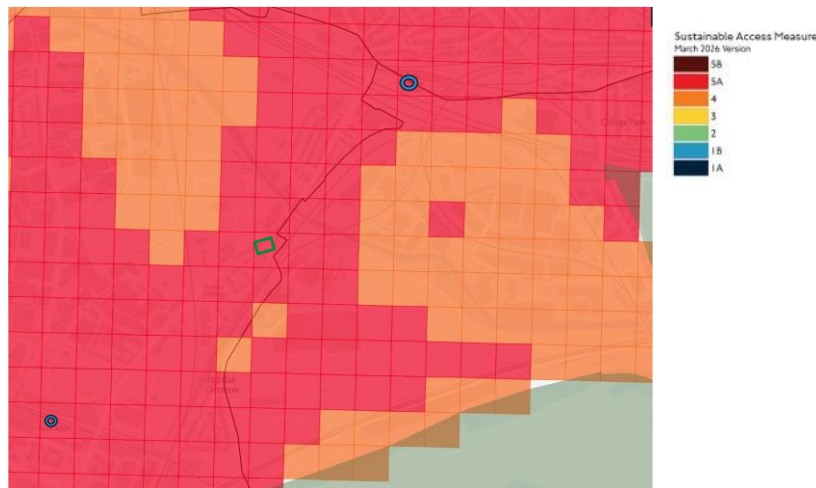
This approach to the use of modelling contrasts with TfL's WebCat model, which shows levels of access to public transport as of 2026. This gives very different results to those from SAM when applied to a specific part of London. This applies to the area around the Old Oak Common station construction site and also to the Kensal Canalside area.

In summary, our reservations on SAM are

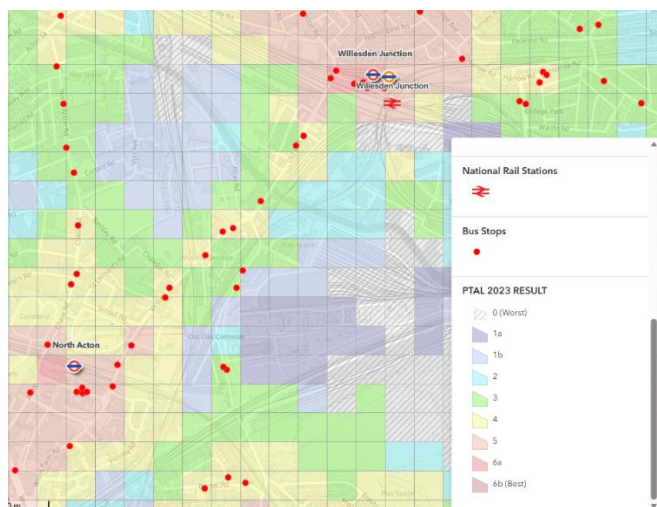
- **SAM is explicitly a 2041 forecast metric**, not a present-day measure.
- It **assumes OOC station is operational**, plus (we think) bus and active travel upgrades, even though these are **10–15 years away**.
- We believe that the model **overstates walking access** and **understates severance** created by rail lines, fenced rail yards, canals, construction sites, road closures – particularly in 'brownfield' areas with a limited street network.

The contrast between the SAM scores and PTAL scores for the Old Oak part of the OPDC area and for the Kensal Canalside OA are shown in the maps overleaf. The difference is substantial.

We fully understand that PTAL and SAM are different measures, with PTAL showing relative levels of access to London's public transport system and SAM being an entirely new methodology designed to provide reflect the connectivity of Londoners to employment opportunities and a range of amenities.



SAM scores for the part of Old Oak between Willesden Junction and North Acton station (blue dots). 2026 PTAL scores for the same area are shown below.



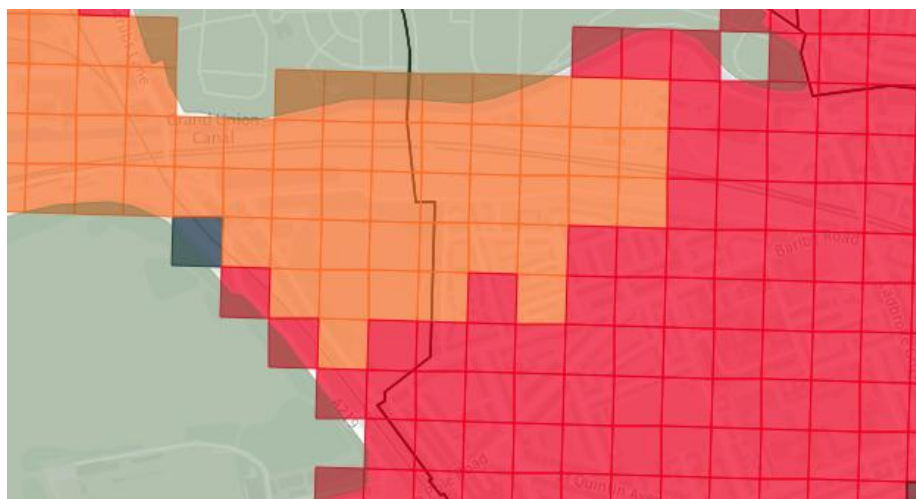
It will take some time for Londoners (and respondents to the consultation on the Draft London Plan) to get to grips with the detailed methodology for SAM. **In the meantime there is the serious risk that the currently published version shows a significantly distorted version of 2026-31 reality of travel and connectivity in parts of London.**

If developers and applicants start swiftly claiming that their sites have high SAM scores and are 'well connected' locations, the implications are obvious. Our Forum has a particular concern that for the past decade the location of Old Oak Common Station has been promoted by HS2 as providing '*unparalleled connectivity*' as if this was already the case. OPDC has maintained that locations around the station site, to the east and west, are already '*well connected*'. These claims are not true.

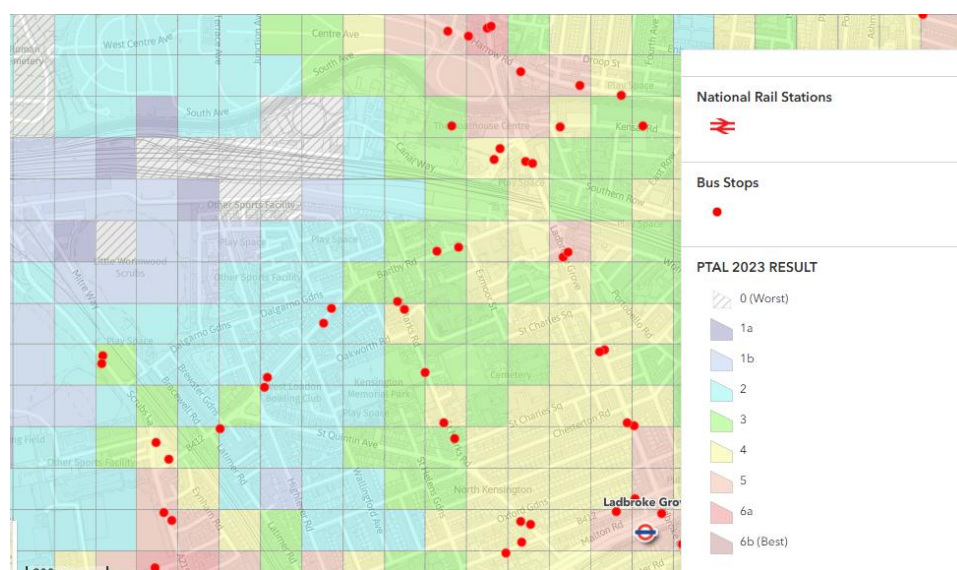
Our Forums come across examples of people who have relocated to the area, entered into rental agreements or even acquired flats and apartments under the misguided impression that they are moving to an area with good to excellent transport connections. We have persuaded some developers to correct their marketing material. It should not be the role of community organisations to have to take such steps.

It took persistent efforts by the Old Oak Forum to persuade OPDC to amend wording in their 2025 Masterplan Framework claiming that *Old Oak is exceptionally well connected, with the new HS2 and Elizabeth line station at Old Oak Common...* This was amended to *Old Oak will be exceptionally well connected, with the future HS2 and Elizabeth line station at Old Oak Common* (but with no mention of when?)

In the case of the Kensal Canalside OA, the contrast between SAM scores and PTAL levels are even more pronounced. The western part of the OA has the worst level of PTAL possible, a rare situation in inner London.



SAM scores for the Kensal Canalside Opportunity Area (3 and 4) with PTAL levels shown below



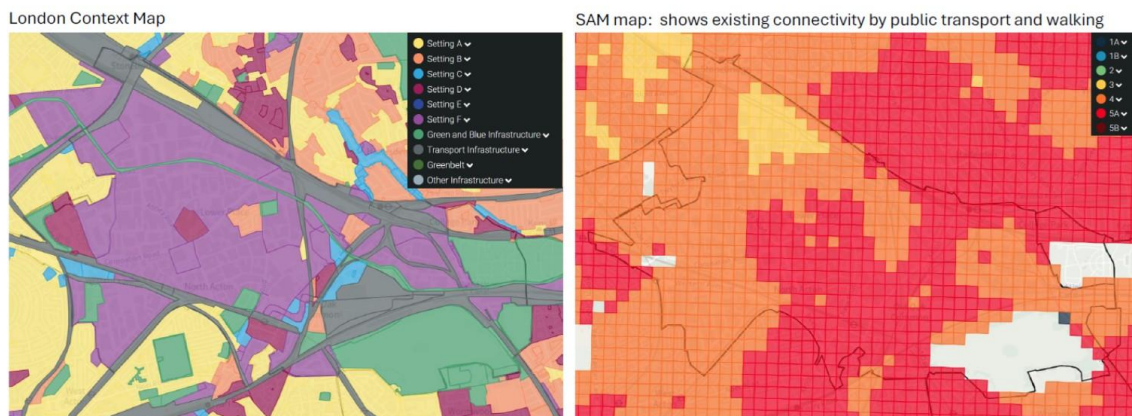
It is hard to understand how the western part of the OA achieves a SAM score of even 3 given the walking distance to the nearest public transport (buses) at the sole entrance/exit to the OA off Ladbroke Grove, given the barriers of the West London Line, and the Grand Union Canal separating the OA from Kensal Cemetery.

Hence our suggested edits to the wording of parts of Draft London Plan Policy MBUL2. We welcome the suggestion in sub paragraph 2 below, in relation to the London Context Map, that LPAs should be able to '*adjust the setting applied to a particular location*'. This gives some scope to local community groups, amenity bodies and neighbourhood forums to input their knowledge and to ensure that 'context' is accurately reflected.

Some of our suggested edits to Draft Policies would not be needed if GLA/TFL can give assurances to the forthcoming Examination of the Draft London Plan that **the SAM model will be published (now and every 2-3 years) as a set of existing maps and scores, and not only as a set of 2041 assumptions**. This does not feel an impossible ask.

There is already evidence of misleading use of the new SAM scores, claiming that these reflect existing rather than 2041 connectivity. The slide below formed part of a presentation by officers to the OPDC Planning Committee on September 10th, with the SAM map labelled as showing 'existing connectivity'.

Density, heights and tall buildings



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

MBUL2 Suggested policy rewording

Part A Plan Making

Plan-making authorities should plan for growth and make the best use of land in line with Box MBUL2, taking full advantage of existing and planned levels of

sustainable transport connectivity **(when delivery is assured within 5-8 years)** and allowing character to evolve by ...

(2) Where appropriate, undertaking or updating character studies to understand local character in more detail. This could include enhancing the precision of the London Context Map and adjusting the setting applied to a particular location based on detailed local knowledge, **where evidence justifies this**. These studies should not preclude change, especially where an increased scale or density of development is expected in accordance with box MBUL2. **Nor should such studies assume that future change is definite or will take place at forecast dates, especially on new public transport infrastructure.**

Development management

C. All development should with reference to Box MBUL2, optimise the use of land in line with the spatial strategy set out in MBUL1, while responding to the site's specific context and constraints. **When using 2041 SAM scores these should be assessed against current PTAL levels, in order that overstated claims on existing connectivity being set aside.**

C(1) Development proposals ~~should be informed by~~ **should take full account of** the relevant density and height ranges in the Optimisation Framework where applicable (see Box MBUL2). Residential development should achieve the minimum densities stated in the Optimisation Framework, unless site specific constraints limit the development potential of the site. Development that complies with the Optimisation Framework should be supported in terms of height and density.

The Optimisation Framework

f. Identify the area's potential and/or sensitivity to change to inform where in the range is optimum **and being clear and transparent on the inclusion of specific planned future improvements in transport infrastructure.**

MBUL3 Tall buildings

We welcome the work of the London Assembly Planning and Regeneration on making a [renewed case for mid-rise housing](#) along with the fact that Draft London Plan and its new Optimisation Framework moves in this direction. The public will welcome the definitions in Figure 2.7 defining a 'mid-rise' height band and classifying anything above 10 storeys/30m as a tall building.

Our two forums support the continuation of a plan-led approach for Tall Buildings, as a key feature of a Strategic Spatial Strategy for London. The requirement in the current London Plan Policy D9 that 'suitable' locations should be identified, consulted on, and

then clearly mapped at the stage of local plan preparation is an important one for Londoners. The fact that the original Ministerial expectations for Policy D9 have become weakened in practice since 2021 remains a concern for our members,

Given the role of a Strategic Spatial Strategy, we do not consider it helpful for London's LPAs to introduce different definitions of what constitutes a Tall Building. This confuses the public on a subject on which strong views are held. Hence our suggested amendment to MBUL3 Plan Making Policy A(2).

We also question the merits of including MBUL3 Development Management Policy A(3). This reads as a get-out clause for landowners/developers and will undermine public confidence in the value of local plans and a plan-led approach. London LPAs have had 5 years to adjust to the idea that Tall Building locations must feature in their local plan preparation and that other proposals cannot surface during intervals between local plans.

In addition, the Forum also questions MBUL3 Development Management Policy B which currently reads:

B. Isolated tall building should only be considered where they clearly mark a place of particular functional or spatial significance and respond proportionately in height to their context or where they are replacing existing tall buildings.

The introduction of new and isolated tall buildings to a location of very different character and urban grain often prompts vociferous public campaigns. This is understandable. Planning consultants persist in finding justifications for 'marker buildings' and 'gateways' in what have hitherto been mid or low rise parts of the city.

How are the public to understand what is meant by a location 'of spatial significance'? What does this mean and who decides on 'significance'?

The reasons for such buildings coming forward nearly always relate to what has been paid by a developer for the site involved. Given that the 1990-2025 era of tall buildings in London may have peaked as a result of construction costs, high embedded carbon levels and building safety requirements, **this 2026 London Plan has the opportunity to usher in period when the prospects for building height are better controlled and hence starts to play a diminishing part in setting land values.** This would be a long-term Mayoral contribution that Londoners would not forget.

Following the 1968 Ronan Point collapse and the end of the first phase of London's 'tower blocks' as homes, there are multiple reasons why and extended second phase from the late 1990s may now be drawing to a close. What is becoming evident is that Londoners have lost faith in the model of Build to Rent towers, with a housing mix predominated by small units.

Our Forum considers it the sign of a civilised city that new isolated tall buildings do not appear on the skyline, other than when replacing churches or civic buildings of heritage value. Other European capitals have gone down this route. Hence our suggested amendments to this policy.

On Metropolitan tall buildings (100m and above in height) we accept the principle that it should be London LPAs at Borough and MDC level which determine the boundaries. Residents in what is now the North Acton ward of LB Ealing have to live with the fact that the North Acton Cluster happened by accident rather than design. The LB Ealing Local Plan (2012/13) signalled nothing like what has since become a notorious part of London's skyline, with towers of 55 storeys. OPDC's delegation of decisions at North Acton from 2015-21 allowed this unforeseen cluster to consolidate.

As of 2026 there is nothing 'metropolitan' about a group of towers sited within a traffic gyratory, with an over-concentration of student housing, a limited retail offer and an overcrowded Underground/Overground Station already placed in the TfL category of '*capacity-driven upgrade need*' and with recognised safety problems for travellers.

Table 2.2 of the London Plan defines the result of this unplanned group of very tall buildings as a new MMC 5 out of 17 across London, and defines the location as referring to the area around Old Oak Common Station, Acton Wells and North Acton.

Firstly, our Forum **questions whether the designation of this location as a Major Metropolitan Cluster is not premature in this iteration of the London Plan, given this context?**

- no decisions yet made on the West London Orbital and a new Overground station at Old Oak Common Lane
- no decisions yet made on a major upgrade to North Acton station
- completion and opening of the Old Oak Common rail interchange scheduled for 2036 at the earliest
- OPDC Masterplan proposals for a *major new town centre* at Acton Wells based only on a non-statutory 'Framework' or prospectus, which departs from the 2022 Local Plan location for this new centre.
- Questions over whether OPDC's for a new east/west bridge spanning to rail lines, to connect Acton Wells with OOC station can be funded from CIL and S106 receipts within the 5 year period before a further London Plan is prepared.

We argue that designation of North Acton as a Major Metropolitan Centre should await a 2031 London Plan, when the impact of OOC station can be assessed with more confidence. As shown by the map at Figure 2.8 of the Draft London Plan, North Acton is one of only two MMCs proposed within the entire western half of the Greater

London Area. The second, at White City in Hammersmith is significantly more established and served by stations at White City, Shepherds Bush, Wood Lane, and Hammersmith Broadway.

While there is no precise accepted definition of a ‘metropolitan location’ it is hard to accept that many Londoners would accept that this definition could or should apply to North Acton. Try this [local online guide](#).

Our second concern is that ‘the area around OOC station’ (itself 1km in length in North Hammersmith) could be interpreted as having a very wide radius, to the north and east as well as the west and south. It would seem from the OPDC’s plans that the MDC’s future decision on the boundary of the ‘cluster’ will extend south of North Acton station to include the part of Acton Wells included in the OPDC Masterplan Framework and the ‘Adjacent Site’ to the OOC construction site.

The next OPDC Local Plan is not due for adoption until December 2029 and is the point when the LPA could define a precise MMC boundary. In the meantime, our Forum considers that the wording in Table 2.2 should offer more clarity, in the form of a suggested amendment below. Other MMC areas in Table 2.2 are already defined with reference to specific sites and roads.

MBUL3 Suggested policy rewording

MBUL3 Plan Making Policy A(2)

(2) identify the locations that may be appropriate for buildings of 30m and above in height (or at a higher threshold if locally appropriate) using the criteria in Box MBUL3 and assessment carried out as part of A(1)

Development Management A(3) delete in its entirety

~~**(3) Where a plan-making authority has not identified appropriate locations for tall buildings in their local plan, or if a tall building is proposed outside of a location identified in a local plan or in Table 2.2, the criteria 1(ii) and (iii) (and for buildings over 100m also criteria 2 (vi) and (vii)) in Box MBUL3 should be considered when determining if the location is acceptable in height terms. Robust justification is expected for any conflict with these criteria.**~~

MBUL3 Development Management Policy B

B. Planned locations for isolated tall building should only be considered where they clearly mark a place of particular functional or spatial significance and respond proportionately in height to their context or where they are replacing existing tall buildings or where there is a clear functional (and non-commercial) requirement for height.

MBUL5 Sustainable transport to enable London's growth

In a number of proposed Brownfield First Opportunity Areas, lack of new transport infrastructure remains the principal obstacle to regeneration and new development.

The **Kensal Canalside OA** is a prime example. The StQW Forum supports the analysis of the Kensington Society and many other organisations that high density and (largely) car free developments in this OA are contrary to existing London Plan policies.

The 'strategic vision' for the OA in Annex E of the Draft London Plan restates a conclusion from the 2025 Pen Portrait of the OA that *The delivery of a new north-south walking and cycling bridge across the Great Western Railway and a pedestrian bridge over the canal are fundamental to the success of the site. Neither of these connections are provided for in the applications from Ballymore/Sainsbury's and Berkeley Homes St William.*

There are many locations in North Kensington where access to public transport is poor as a result of barriers to east/west connection (the West London/Mildmay line) and north/south connection (the Grand Union Canal). The continued delay in delivering the White City East-West Link between Latimer Road and Imperial College's White City campus exposes a longstanding weakness in strategic infrastructure delivery, when projects are reliant on S106 commitments. Fourteen years after such a commitment by Imperial College, this essential connection remains undelivered. **Policy MBUL5 should place greater emphasis on delivery accountability, with clearly defined responsibilities, published implementation milestones and coordinated improvements to adjoining streets and public spaces.**

In the **Old Oak and Park Royal OA** the fragmented nature of the road network needs to be recognised in all development management decisions. Current HS2 construction works (along with construction of the developments) make car and bus journeys near impossible at time. A four year closure of Old Oak Common Lane to facilitate HS2 bridge work threatens disruption on an unprecedented scale, this road being one of only two major north-south routes through the area.

MBUL5 suggested amendments to policy wording

Plan Making B2 (2) be informed by proportionate evidence of transport challenges and requirements with reference to TfL strategic transport modelling of existing as well as planned future interventions supplemented with local evidence as needed

Development Management MBUL5 add new subparagraph (H) 'where significant transport infrastructure improvements are to be funded and delivered through planning obligations, the LPA granting consent should require development milestones and monitor delivery actively via their Authority Monitoring Reports.'

Policy HN1 Increasing London's housing stock

Both the Old Oak and StQW Forums have argued for a decade that the original target of 25,000 new homes for the Old Oak and Park Royal Opportunity Area was never adequately researched or evidenced. The Draft London Plan reduces the overall target to 23,000. The 11 year target from 2027/28 to 2036/37 is set in Draft London Plan Policy HN1 at 11,335.

The Authority Monitoring Reports (AMR) for 2025/6 shows a total of 6,368 permissions granted, **on schemes which have not started.**

Local people see little serious evidence of the '£10bn development boom' in the old Oak area, which both HS2 and the OPDC have been claiming in material distributed at MIPIM in March 2025 and repeated in the recent Opportunity London's September [Investment Showcase](#).

In relation to Draft London Plan HN1 the Old Oak Forum considers that the 11,335 housing target for OPDC for the decade 2027/28 to 2036/37 to be a policy that will be found to be ineffective. We continue to track closely the OPDC procurement exercise to select a master development JV partner to deliver 8,000 new homes in the Old Oak Masterplan area. Our concern remains that any selected partner will exact a heavy price for entering into a 30 year contract in 2027 to deliver new homes from 2029, given that any significant improvement in access to London's rail and Overground/Underground network may well remain as long as a further decade away.

The OPDC's 8,000 homes figure relies on use of development sites in a non-statutory 2025 'Masterplan Framework'. Many of the sites involved are not allocated in the 2022 adopted OPDC Local Plan, and are likely to be strongly resisted by local people on that basis – particularly where tall buildings are proposed.

DRAFT POLICY HN2 (Development Management)

Both the Old Oak and the StQW Forums **welcome** part D of this Draft Policy which states: ***D. Development proposals for modular temporary accommodation as a meanwhile use should be supported where possible.***

Supportive text 3.34 reads *In terms of temporary accommodation as a meanwhile use, the plan recognises that modular housing may play a role in optimising underutilised land in the short-term, whilst addressing urgent local housing need.*

Given the demands for social housing and temporary accommodation in north-west London, and the immense strains on Borough Council budgets, the Old Oak Neighbourhood Forum has argued the case² for a GLA led initiative to build 15 – 20 year

² See the Forums's [Pre-submission draft Old Oak Neighbourhood Plan](#)

low and mid-rise modular homes on the development sites acquired by OPDC in recent years. This programme of delivery of new homes could then extend across the existing large-scale HS2 construction compounds as and when these are released in the coming years.

These construction compounds and the logistic arrangements already in place for HS2 construction would provide a good context for onsite manufacture of modular housing units at scale.

The two major developments planned for the adjoining Kensal Canalside OA appear to be currently stalled. S106 negotiations on the Ballymore/Sainbury's scheme (3,519 units) continue, after the RBKC planning consent granted in November 2025. The revised Berkeley Homes St William application has yet to be determined. As an 'island' location with a single entry/exit on Ladbroke Grove, these two development sites are inherently unsuited for high-rise high-density car-free homes as currently proposed.

Local people in the area see the closure of the Cargiant business (a 43 acre site) as a further opportunity for a comprehensive re-assessment of the potential of 'Old Oak North/Scrubs Lane' to be added to what could be **a replanned urban extension for London** in which 'gentle densities' and interlocking walkable neighbourhoods could be masterplanned and delivered as a GLA intervention, at a scale which does not appear to being given any consideration at present.

Widening the boundary of the existing MDC area would require a separate statutory process under the 2011 Localism Act. We suggest that the GLA could explore whether a **Mayoral Development Zone/OA designation could effectively achieve many of the same coordination benefits without formally extending the OPDC boundary. A direction of travel to this end could be signalled in the final London Plan.**

Policy HN5 Managing Specialist Accommodation

The Old Oak Forum **strongly supports** the inclusion in the Draft London Plan of a clearer policy on Purpose Built Student Housing along with specific numerical 'requirements' for each London planning authority over the period 2027/28 - 2036/37.

PBSA has become a standby solution of major London developers, to be proposed from an initial application onwards, or to be switched into a housing scheme that has seen its financial viability fall below acceptable commercial levels. Assessments of 'need' in an area for PBSA can all too easily be manipulated by consultants by extending the boundary of the area in question when assessing proportions of student rooms as compared with conventional housing.

Our [June 2025 representation on Towards a New London Plan](#) included a detailed annex on the number of PBSA units constructed in North Acton in recent years, including consented schemes and those in the pipeline. These added up to a potential 5,319 units

as compared with our estimate of 5,173 residents living in conventional housing. The study area was defined as the ‘North Acton Cluster’, i.e. the area within and close to the Victoria Road Gyratory.

Since this study was prepared Imperial College has submitted a S96A application followed by a S73 application to vary to content of its 2023 consent for a seven building scheme at One Portal Way. This involves switching the content of one of three 50+ story towers from C3 housing to PBSA and increasing the amount of purpose-built student accommodation in the consented hybrid masterplan from **384** bedrooms to **1,926** bedrooms. The accompanying updated consultancy report from Savills continues to assert ‘need’ at a location which has no university campus.

The ‘requirement’ for PBSA as assessed in the Draft London Plan for the whole OPDC area is for a total of **680** units over the next 10 years. There are already **1,765** student units consented and yet to start on site, in three separate schemes at North Acton. London Plan intervention is needed to avoid the risks of oversupply across London, at a time when student applications are falling and increasing numbers are choosing to live at home.

LB Brent has introduced a moratorium on PBSA in the Wembley Growth area and seeks to get back to a 20% proportion of students to other residents. Our two forums support this ratio.

Policy HN5 suggested policy rewording

Plan Making

(1) seek to meet the need for PBSA, identifying positive opportunities for its contribution to local and strategic objectives, allocating sites for a level of provision that will ~~satisfy~~ **accord with** targets in Table 3.6 **without risking significant over-supply at the cost of conventional homes.**

(2) identify if and where spatial concentrations or proliferation of PBSA or LSPBSL accommodation exist compared to conventional housing, and the extent to which it is impacting the ability to ensure mixed, inclusive neighbourhoods and develop policy to address this. **Proportions of student rooms above 20% of the total population for the immediate area will need strong additional justification.**

Policy GLE3 Data centres

The Old Oak Forum also **welcomes** the introduction of a specific policy on data centres. In the years since the 2021 London Plan, the Park Royal area has seen a significant new cluster of data centres. These have been consented as an acceptable commercial use on Strategic Industrial Land with very little or no consideration of criteria on the ‘suitability’ of individual sites for this specific use – the impact of which is only beginning to become widely understood by the public.

Draft Policy GLE3 is welcomed, but we argue for an additional criteria in the Plan Making part of the policy, at **A6** to read: **at a sufficient physical distance from existing residential streets to avoid risks of sense of enclosure from excessive height and massing, unrelenting operational noise, noise, air pollution, water stress and contamination, light pollution, and localised heat-island effects**

Annex E Brownfield First Opportunity Areas strategic growth visions

As we understand, these brief ‘strategic growth visions’ for each of London’s 47 Opportunity Areas sit outside the policy content of the Draft London Plan and are for guidance only. It would be helpful to have their status clarified. We consider this to be:

- **Status:** *Non-policy, non-spatial, supporting text.*
- **Weight at EiP:** They can be *examined for soundness*, but **cannot** be treated as policy and **cannot** impose requirements on boroughs or OPDC.
- **Function:** They provide **20-year housing and employment capacity ranges** for each Opportunity Area — the only place in the Draft Plan where full-period numbers appear.
- **Implication:** They guide strategic thinking but do **not** bind neighbourhood plans, borough plans, or development management decisions.

As mentioned at the start of this representation, the **Old Oak and Park Royal OA** was categorised as recently as June 2025 as ‘underway’ and now appears in the Draft London Plan as ‘mature’. Local people are unclear what has happened in the intervening year to justify this uplift?

The criteria and methodology for these classifications are not published anywhere in the Plan or its evidence base (that we can find). We consider that this omission renders the OA classifications — and the strategic growth assumptions that depend on them — to be **unsound** under NPPF tests of soundness.

In respect of the OPDC area, the figures in the 2021 London Plan at Table 2.1 are for

Old Oak/Park Royal	Indicative Homes 25,500	Indicative jobs 65,000
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The ‘indicative jobs’ figure in Annex E of the Draft London Plan is **Indicative jobs: 19,900 (LESD 2024). This is an enormous drop.** Our Forum members have heard some verbal explanations for this drop at OPDC meetings but have yet to find evidence and justification in the Draft London Plan itself. Explanations have included the fact that West London’s office market has changed, and that the development of a number of logistics hubs and data centres in Park Royal involve small numbers of employees. We suggest that this is an issue worth exploring at the examination of the Draft London Plan. If new jobs are not there at anything like the level forecast in 2015, then does the vision of *high-density transit-oriented development* in this part of London remain valid?

Old Oak Neighbourhood Forum and St Quintin and Woodlands Neighbourhood Forum, October 2026
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