

TOWARDS A NEW LONDON PLAN 2025 CONSULTATION

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

Background

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

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

Executive Summary

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

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

Specific to the Old Oak and Park Royal Opportunity Area

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

locations with a university campus and ‘student dormitories’ of the type that has developed at North Acton

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

Among the recommendations we made in 2022 were these:

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

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

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

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

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

Brief background to the Old Oak and Park Royal Opportunity Area

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

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

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

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

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

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

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

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

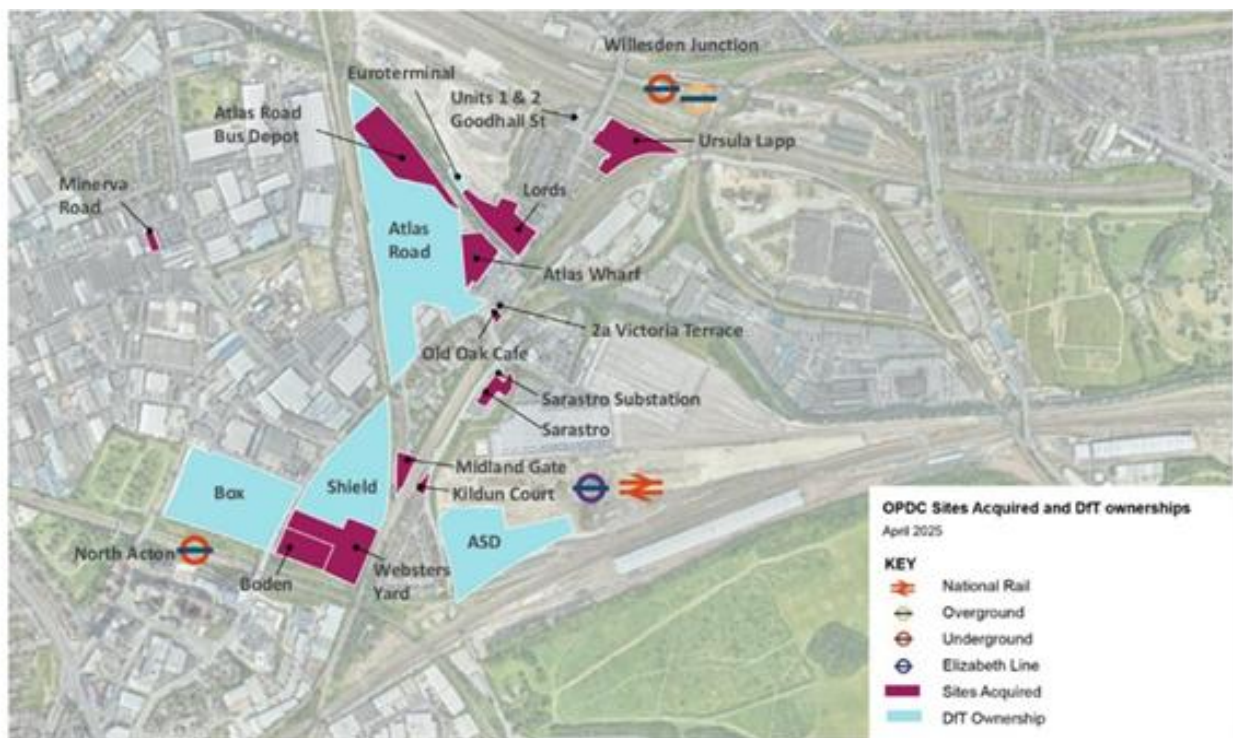
A sizable portfolio of development sites has been assembled, combining those owned by DfT (and in use as HS2 construction compounds) along with a series of former privately owned sites for which OPDC has acquired control (see map below).

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

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

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

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



The GLA ‘pen portraits of London’s Opportunity Areas

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

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

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

OA status - London Plan 2021

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

Figure 2.2 - OAPF process diagram



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

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

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

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

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

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

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

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

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

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

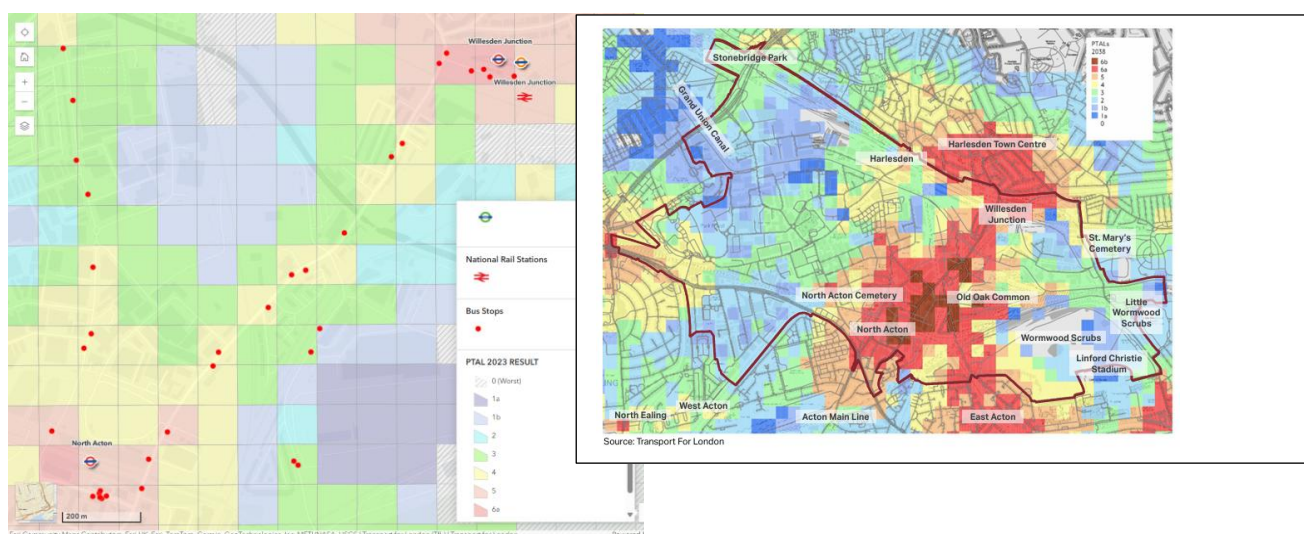
⁴ In his 31st March letter to the Secretary of State, now published, Mark Wild says *I am stopping all activity that does not solely support the reset, in year productivity or essential controls.*

Local people agree that there are parts of West London that are seeing something of a development boom. Hammersmith's White City Opportunity Area and its 'Innovation District' is doing well on housing delivery, even if the density of the tall building cluster is anathema to many Londoners. On GLA metrics, this OA warrants the 'proposition' of a move upwards from *'ready to grow'* to the category of *'underway'*. Neighbouring Kensal Canalside OA meanwhile remains classed as *'nascent'* because it lacks key pieces of transport infrastructure.

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

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

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



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

Will there be development interest sufficient to make this masterplan a reality, starting from a 2026 selection of a master developer? This procurement process is taking place when the timeline for OOC station and Elizabeth Line connections is unknown. Is OOC station still seen as critical to regeneration at Old Oak, or is it not an essential after all?

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



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

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

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

the Grand Union canal path – a walk now dominated by cyclists at commuting hours. Even when complete, the Old Oak Common ‘superhub’ will not connect well into the West London road network, the sole road access being at Old Oak Common Lane.

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

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

Old Oak/Park Royal Delivery of homes

Delivery pre-2019
Completions since designation against capacity

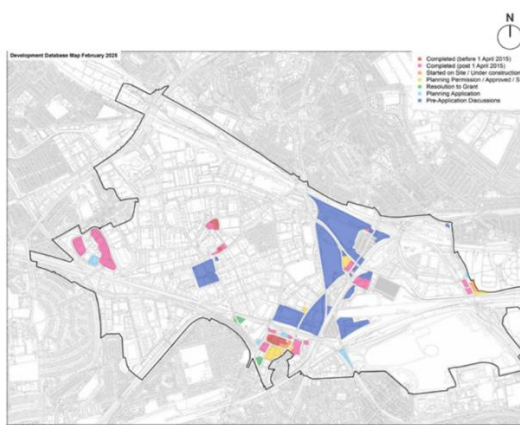


OPDC was established in 2015, and between then and 2019, 1,453 homes have been completed.

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



Considering the completions and pipeline, the OA is meeting 78 per cent of its 10 year capacity. Current completions alone account for 11 per cent of the London Plan 22 year capacity and 20 per cent of the 10 year capacity.



Housing capacity at Old Oak

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

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

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

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

provided in the Plan's table of site allocations. Average net densities of 600 units/hectare are envisaged in several of the 'Places' that make up the 2022 Local Plan. In terms of individual applications consented and built to date, these range from 400-500 dph in Scrubs Lane to 2,121dph at North Acton.

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

Old Oak/Park Royal Development activity 2024



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

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

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

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

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

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

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

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

OPDC’s next steps

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

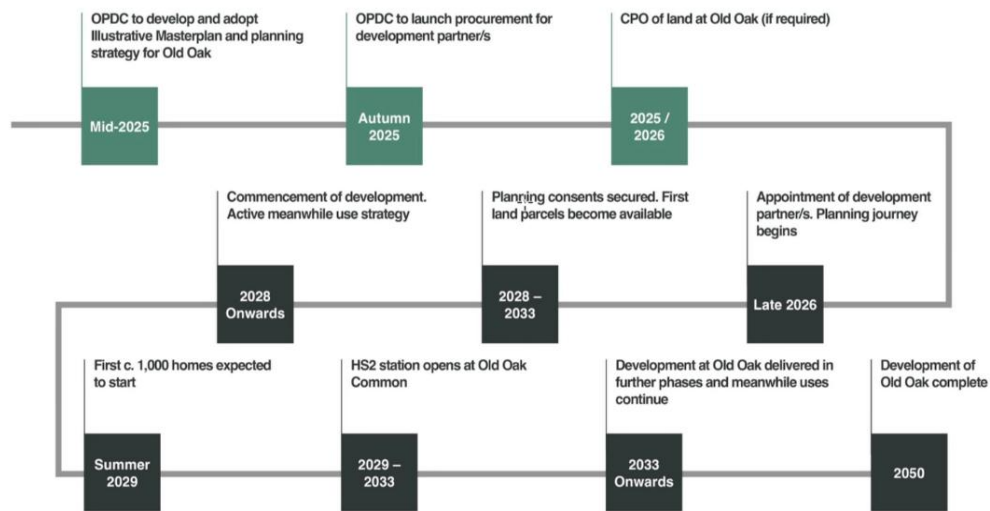
The planning team have identified a number of ‘deviations’ in the masterplan where it does not conform with the adopted 2022 Local Plan. The officer report assured the committee that, taken as a whole, the masterplan is likely to accord with the OPDC 2022 Local Plan and 2024 SPD for Old Oak West. Such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

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

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

NEXT STEPS

Ensuring sites are brought into active use as soon as practically possible, delivering meanwhile uses where appropriate. Development phased to deliver the right infrastructure and mix of uses at the right times.



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

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

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

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

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

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

Conclusions

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

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

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

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

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

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

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

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

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

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

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