

Subject: Old Oak Masterplan
Meeting date: 19 June 2025
Report to: Planning Committee
Report of: Emma Williamson, Director of Planning

For Note and Comment

This report will be considered in public

1. Summary

- 1.1. OPDC's Delivery Team has developed an Illustrative Masterplan for Old Oak to guide the future development of the area. This will form the basis of an Old Oak 'Masterplan Framework' which will summarise the most important aspects of the Illustrative Masterplan, setting out development parameters and guidance for future development proposals as well as the scope of future site wide delivery strategies, for example, phasing, housing delivery, social infrastructure and public open space.
- 1.2. Since November 2024, pre-application discussions on the Illustrative Masterplan have been held between OPDC's Planning and Delivery teams. During this time, the Delivery Team has also commenced public consultation; engaged with the London Boroughs, the Greater London Authority (GLA) and Transport for London; and taken the Illustrative Masterplan to Place Review Group and Community Review Group.
- 1.3. The Illustrative Masterplan proposes approximately 8,000 new homes and up to 190,000 sqm of workspace, ground floor commercial uses and social infrastructure. The proposed social infrastructure comprises a 3-form entry primary school, a new leisure centre, health centres and community spaces. Six acres of new parks and green space is also proposed (excluding the HS2 Park).
- 1.4. The proposed east-west bridge is a critical piece of infrastructure needed to ensure the delivery of the Old Oak Town Centre and the wider masterplan. It is proposed to re-position the bridge from the location set out in the Old Oak

West SPD, so that a more direct connection between the HS2 Park and Acton Wells Park is created.

- 1.5. The Illustrative Masterplan includes the demolition and redevelopment of two locally-listed buildings. Given the scope of the Illustrative Masterplan and the level of detail provided at this stage, the LPA has not provided a definitive view on this aspect of the proposals. Notwithstanding, at planning application stage, the relevant policy tests will need to be satisfied.
- 1.6. In general terms, the proposed site-wide approach to land use, building height, landscape, streets and movement are well-considered and supported in principle.
- 1.7. There are some areas where the Illustrative Masterplan deviates from the Local Plan and Old Oak West SPD. However, subject to further justification on these areas which will be provided in due course, overall it is considered that when assessing the masterplan as a whole and taking account of the benefits of the scheme which will be confirmed at a later date, the Illustrative Masterplan is capable of being in accordance with the Local Plan when development proposals are considered in the context of future planning applications.

2. Recommendation and Purpose of the Meeting

- 2.1. **The Committee is invited to note the contents of this report and the current version of the Masterplan (“the Illustrative Masterplan”), to raise any queries with officers at the meeting, and to provide informal comments on it that can inform discussions between OPDC (in its role as local planning authority) and the OPDC Delivery Team.**
- 2.2. The Committee is reminded that the purpose of this meeting is as set out in paragraph 2.1 and that some of the views of officers in this report are deliberately qualified because there is no planning application to be considered at the current time. Members are also reminded that they must not have a closed mind when they come to make a decision on any future planning applications that derive from the Illustrative Masterplan proposals. They must decide any future planning applications that flow from the Illustrative Masterplan at the relevant meeting with an open mind based on all the material evidence and information available at the point of determination.

3. Background

- 3.1. In February 2024, OPDC adopted the Supplementary Planning Document for Old Oak West (the “Old Oak West SPD”), an area now referred to simply as Old Oak. The Old Oak West SPD was informed by an extensive programme of community engagement and co-design activities that took place during 2023, including a series of ‘Place Labs’, drop-in sessions, bespoke workshops and 1-2-1s, which engaged over 260 local residents and businesses.
- 3.2. The Old Oak West SPD, alongside associated OPDC planning policy and guidance including the Local Plan, the Public Realm and Green Infrastructure SPD and the Industrial SPD, and the community engagement programme, have guided the creation of a strategy to deliver the regeneration of Old Oak by OPDC’s Delivery Team.
- 3.3. The starting point for this strategy was the establishment of a set of overarching design principles, or ‘Spatial Principles,’ to guide the creation of a successful and coherent place with characterful and integrated neighbourhoods. These principles, shared with local communities and stakeholders in Summer 2024, and to Planning Committee in a private briefing in February 2025, established key priorities and ambitions for Old Oak, including for a new town centre, as well as new and improved neighbourhoods, connections, public realm, and green space.
- 3.4. OPDC’s Delivery Team has used the Spatial Principles to shape an Illustrative Masterplan for Old Oak to guide the future development of the area. The Illustrative Masterplan is intended to:
 - Create images and other materials which bring to life the ideas and vision for the new neighbourhoods in Old Oak to help engage potential future developers and partners in the opportunity here.
 - Test how the different requirements for the sites can be accommodated by showing one potential way that the development could be arranged.
 - Help identify what aspects of the proposals should be prioritised to deliver, and which aspects should be captured in a ‘masterplan framework’ for the future developer partner/s.
- 3.5. The consultant team working on this for the OPDC Delivery Team includes Gort Scott and Allies and Morrison as architects, Mott Macdonald as transport consultants, Expedition as sustainability consultants, Periscope as landscape architects and Tibbalds as heritage consultants.

- 3.6. It is important to emphasise that the content of the Illustrative Masterplan sets out how the Delivery Team's objectives and requirements for Old Oak could be delivered. Detailed development proposals will be brought forward by the Delivery Team working with future developer partner/s, which the Delivery Team will begin to procure later this year.
- 3.7. The Illustrative Masterplan will form the basis of an Old Oak 'Masterplan Framework' ("the Framework"). The Framework will summarise the most important aspects of the Illustrative Masterplan and will guide the proposals that will be brought forward by the Delivery Team and their future developer partner/s, in order to ensure that their proposals are aligned with the key priorities and ultimately deliver a well-integrated, successful urban district.
- 3.8. Since November 2024, pre-application discussions on the Illustrative Masterplan have commenced between OPDC's Planning and Delivery teams. Five pre-application meetings were held on the following topics:
- Meeting 1: Introduction and overview of Spatial Principles.
 - Meeting 2: Connected Place Vision including landscape, movement, streets and bridges.
 - Meeting 3: Canalside Neighbourhood.
 - Meeting 4: Old Oak Town Centre.
 - Meeting 5: Overall feedback session and initial heritage discussions.
- 3.9. The purpose of these pre-application discussions have been to:
- Inform the future planning application process and assist with development partner procurement in the future;
 - Create an Illustrative Masterplan to form the basis of a Framework to inform future planning applications;
 - Support future site-wide strategies;
 - Support future policy reviews;
 - Support land acquisition both by agreement and, if necessary, compulsorily.
- 3.10. Engagement with the London Boroughs, the GLA and TfL have also taken place during this time, including:
- London Borough of Ealing – 26 March and 29 April 2025
 - London Borough of Hammersmith and Fulham – 9 June 2025
 - London Borough of Brent – 10 June 2025

- GLA and TfL – 3 June 2025

- 3.11. The OPDC Delivery Team is engaging with local residents, businesses and stakeholders to share the Illustrative Masterplan and hear their views before the proposals are taken to the OPDC Board in the summer. This included, during May 2025, two in-person exhibition events, awareness raising at Standard Road Market and an online event.
- 3.12. There were over 120 attendees across these events. Respondents valued spaces that are easy to move around, with shops, places to meet and things to do. There is a strong desire to retain local character through heritage references and a balance of old and new. People highlighted the importance of green spaces, community spaces, local events, food growing areas, markets and better access to the canal. Public realm improvements need to feel connected to existing communities and responsive to local needs. Safety, security and healthier high streets were recurring themes, with concerns raised around traffic, parking and antisocial behaviour.
- 3.13. A further phase of workshop engagement is planned for the summer, when the team will seek to gain community input into the Masterplan Framework, to ensure that it reflects local priorities in preparation for agreeing the Framework in the late summer / early autumn.
- 3.14. As part of this process, the proposals have also been reviewed by OPDC's Community Review Group (CRG) and Place Review Group (PRG). The first CRG took place on 9 December 2024, with a second review on 19 May 2025. PRG was held on 28 November 2024 and 8 May 2025. A summary of the panel's comments is set out below:

Place Review Group

- Considered overall that the Illustrative Masterplan is compelling with potential to create an exciting new piece of city.
- Support for the urban approach and distribution of height and massing which accommodates the demands of high-density development. The 'Sunny Banks' concept is welcomed.
- Social infrastructure and low carbon principles are key and should underpin all aspects of the Illustrative Masterplan.
- An architectural strategy is needed to ensure a coherent approach to designing the new neighbourhoods and landmark buildings.
- The east-west bridge proposals are generally supported; work needed on how the eastern end of the bridge lands.

- Landscape and public realm strategy is robust but should ensure spaces are distinctive and place-specific.
- Further work required on how Old Oak connects with and permeates into the wider area.

Community Review Group

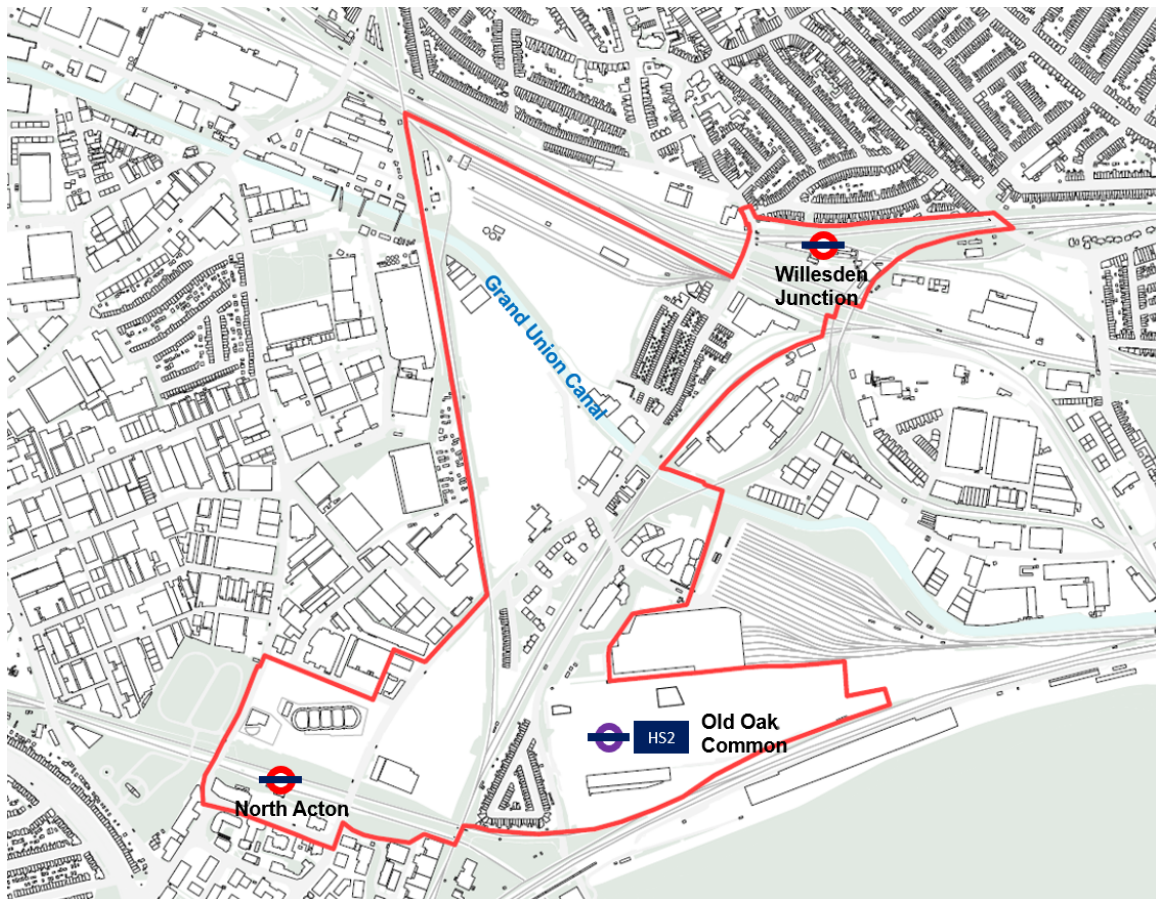
- Spatial principles are well considered, especially the main development corridors, distribution of green spaces and two new neighbourhoods.
- The approach to tall buildings is rational, subject to wind and daylight/sunlight impacts.
- Important that social and community infrastructure addresses local needs and creates an attractive offer.
- Enhancing connectivity for pedestrians and cyclists is a central principle of the Illustrative Masterplan. The approach is successful but further consideration of connections beyond the site is needed.
- The east-west bridge will be a significant enhancement for local movement. More thought is needed in regard to accessibility and an equitable experience for all users.
- Quality and experience of ground floor will rely on active and engaging building frontages.
- Continuous active frontages along the Old Oak Mile feels unrealistic and suggest that clustering activity hubs could be more achievable and would help to create different character areas and destinations.
- Approach to public realm and providing meaningful green spaces and parks is positive.
- Opportunity for community involvement in the management and use of the landscape should be considered.

4. The Masterplan

Scheme description

- 4.1. The Illustrative Masterplan proposes approximately 8,000 new homes and up to 190,000 sqm of workspace, ground floor commercial uses and social infrastructure. The proposed social infrastructure comprises a 3-form entry primary school, a new leisure centre, health centres and community spaces. Also proposed are new streets, bridges, cycle lanes, public realm and six acres of new parks and green space (not including the HS2 Park).

- 4.2. The plan below sets out the boundary of the Illustrative Masterplan which aligns with the Old Oak West SPD boundary.



Policy Background

- 4.3. OPDC's planning policy framework includes a series of documents relevant to Old Oak. The Local Plan provides extensive policies comprising:
- **support for Good Growth (SP2)** and comprehensive development;
 - **movement networks (SP7)** including Old Oak Street and enhancements to Old Oak Lane, Victoria Road and Old Oak Common Lane to deliver the Mayor's Healthy Streets approach;
 - **transport infrastructure** including the new Acton Wells East to Old Oak South Bridge (P7C2), other new bridges (T1), enhancements to existing bridges (T1), enhanced bus services (T6), the potential Old Oak Common Lane Station (P7C2) and safeguarding land for West London Orbital services (P7);

- **green infrastructure (SP8)** including two 2-hectare Local Parks, pocket parks, canalside spaces and green streets to deliver 30% of development sites as public open space;
- **land use designations (SP5)** including the Old Oak Major Town Centre, North Acton Neighbourhood Town Centre, Commercial Centre, Cultural Quarter and mixed-use areas;
- **social infrastructure (TCC3/TCC5)** including one 3-form entry Primary School, one primary care health facility in North Acton and Acton Wells, two community hubs, public access leisure centre (including swimming pool) and three neighbourhood policy facilities;
- **building heights (SP9 / Place Policies)** including appropriate height responses to sensitive locations, heights ranges at specific locations and tall building locations; and
- **site allocations (SP10)** to deliver a minimum of 6,905 new homes and a minimum of 268,540 square metres of non-residential floorspace resulting in an indicative 22,365 jobs.

4.4. Old Oak comprises six different 'Places' in the Local Plan and is subject to different Place policies. The Old Oak West SPD was produced to provide clearer spatial planning guidance for Old Oak. The Old Oak West SPD coordinated Local Plan policies and included new content from the community engagement carried out in 2023, as detailed in paragraph 3.1. New content included guidance to secure Social Value, design of public open spaces and supporting the delivery of meanwhile uses for local businesses.

4.5. In addition to the Old Oak West SPD, other SPDs provide guidance relevant for Old Oak. These comprise:

- **Industrial SPD (2023)** which includes guidance for delivering high quality light industrial uses in mixed-use developments;
- **Public Realm and Green Infrastructure SPD (2024)** which sets out OPDC's Street Family and detailed guidance to deliver inclusive, sustainable and well-designed streets, bridges and open spaces including Local Parks;
- **Revised Planning Obligations SPD (2024)** which sets out guidance to secure S106 agreements;
- **Waste Management in High Density Development SPD (2022)** which includes guidance to manage waste sustainability within high density developments;

- **Energy, daylight and overheating in High Density Development SPD (2022)** which provides design guidance to deliver sustainable high density developments.

5. Pre-application discussions

- 5.1. The section below sets out a summary of the matters raised in the pre-application meetings between the OPDC Delivery and Planning teams. It is structured around the following topics:
- Spatial principles
 - Land use considerations
 - Heights and massing
 - Design
 - Heritage
 - Transport and movement
- 5.2. While the Illustrative Masterplan includes street level views and visualisations to illustrate the type of places envisaged, the level of detail provided is commensurate with a scale that is 'site-wide'. As such, officer's comments are reflective of this masterplan scale and not the acceptability of individual buildings or plots. Furthermore, the full list of 'matters not discussed' is set out in paragraph 5.64 below.

Spatial principles

- 5.3. The following spatial principles form the basis of the spatial arrangement of the Illustrative masterplan:
- **The Old Oak Mile** - the main north-south 'high street' route connecting North Acton and Willesden Junctions stations at either end of the masterplan area, and intersecting the Old Oak Town Centre and Canalside Neighbourhood;
 - **The Common Cut** – the route via Old Oak Common Lane towards Wormwood Scrubs;
 - **The Old Oak Line** – a new east-west route between Old Oak Common Station and Park Royal, intersecting Old Oak Common Lane, Victoria Road and Chase Road;
 - **Two New Neighbourhoods** – the Old Oak Town Centre and Canalside Neighbourhood;

- **Connecting Parks** – the three main parks;
 - **Landscape edges** – key edges provided by the railway embankment (south of the masterplan) and canal (north of the masterplan).
- 5.4. Overall, the OPDC Planning Team are supportive of the spatial principles which are considered to provide a coherent and robust foundation for the Illustrative Masterplan.

Land use considerations

Land use

- 5.5. The two new neighbourhoods – Old Oak Town Centre and the Canalside Neighbourhood – each contain a mix of residential and commercial uses, along with commercial units and social infrastructure at ground and lower levels. The arrangement of these uses in terms of the approach to mixing neighbourhoods, provision of active frontages and a mix of unit sizes, and strategically-located social infrastructure, is considered to be successful and would provide high levels of activation across the masterplan area.
- 5.6. In accordance with the Old Oak West SPD, officers requested further information regarding the strategy for anchor, catalyst, cultural and meanwhile uses, and markets. These are considered to be key ingredients needed to support successful town centres. It is understood that further information will be provided in due course and will be secured within the Framework.
- 5.7. It is of note that the Illustrative Masterplan proposals would involve the loss of safeguarded waste sites on the Channel Gate and Acton Wells East sites, as well as the bus depot on the Channel Gate site. The OPDC Planning team do not object to this in principle subject to meeting Local Plan and London Plan requirements relating to replacement capacity.
- 5.8. Overall, while there is flexibility in how the proposals come forward and notwithstanding some deviations from planning policy regarding the distribution of town centre and commercial uses as set out in the following section, the OPDC Planning Team support in principle the approach to land use.

Deviations from the Local Plan and Old Oak West SPD

- 5.9. It is considered overall that the land use proposals as a whole are capable of being in accordance with the Local Plan. Notwithstanding, there are elements which currently deviate from planning policy in the absence of more detailed

information, which will be provided in due course. The main areas that are not in full accordance with planning policy are set out below and addressed in turn.

A. Tall buildings located outside of tall building locations and buildings (tall and not tall) which breach the range of building heights set out in the Local Plan's individual Place policies.

- 5.10. The Delivery Team make the case that the individual building height policy deviations form part of a site-wide strategy; also, that in some cases it has enabled lower heights and reduced massing elsewhere in response to local context and daylight/sunlight constraints.
- 5.11. Three notable examples of where the guidance height range is exceeded includes the proposed 35-storey tower in the Canalside Neighbourhood (the Channel Gate place), the 45-storey tower within North Acton and Acton Wells place and the 55-storey station marker tower (within the Old Oak South place). All three buildings are identified as landmark buildings as part of the site-wide strategy.
- 5.12. Overall, subject to a more comprehensive analysis of each building height policy deviation, taking into account townscape, microclimate, amenity and additional benefits, it is considered that a compelling case could be made for these exceptions in the context of a specific planning application. Furthermore, as described further in paragraph 5.31 below, the overall site-wide approach to building heights is supported in principle.

B. The distribution of town centre uses does not fully reflect the Local Plan's Old Oak major town centre boundary.

- 5.13. The proposed Old Oak Town Centre and Canalside Neighbourhood Centre align with the Local Plan's major town centre location. However, town centre uses are also proposed outside this boundary, particularly along Victoria Road and parts of Old Oak Lane (i.e., the Old Oak Mile). The Local Plan supports active employment, not town centre uses, along Victoria Road. It is also not yet clear whether town centre uses are proposed along Old Oak Common Lane within the major town centre.
- 5.14. While a case has been made for active town centre uses along the Old Oak Mile, and the rationale for the Old Oak Mile as a spatial principle is accepted, in order to ensure policy compliance, officers have requested further clarity on why town centre uses are preferred over employment uses along Victoria Road and whether town centre uses are planned for Old Oak Common Lane north of Old Oak Street. It is understood that this information will be provided in due course.

C. The three commercial clusters proposed in the Old Oak Town Centre, compared to a single employment hub centred around the Old Oak Common station.

- 5.15. Three commercial clusters are proposed within the Old Oak Town Centre which are distributed along the east-west 'Old Oak Line'. This includes the station hub cluster adjacent to the Old Oak Common station, the 'Heart of the Town Centre' cluster along Acton Wells Park, and the School Road cluster which has a more workspace/industrial nature given its proximity to Park Royal.
- 5.16. The justification for this approach is robust and based on early market engagement, where it is stated that future commercial occupiers should be given more choice and flexibility in terms of the type and cost of workspace, which is an important viability consideration. The case also sets out the benefits associated with mixing residential and commercial uses which includes activation in the evenings and at weekends. The precedent of King's Cross is referenced which demonstrates how the mixing of uses has been successful.

D. Reduced commercial floorspace provision compared to the minimum target in the Local Plan site allocations.

- 5.17. A total of 268,540 sqm NIA (equivalent to over 2.89 million sqft NIA) of commercial floorspace forms the minimum target for the site allocations within the masterplan area. This was based on OPDC's Development Capacity Study (DCS) which formed part of the evidence base for the Local Plan.
- 5.18. The masterplan proposes less commercial floorspace than this minimum target. A lower, middle and upper scenario (1.01, 1.35 and 1.96 million sqft respectively) is proposed to ensure flexibility in how the commercial centre is brought forward. The justification for the approach and for the reduced quantum of commercial floorspace is again based on early market engagement. The stated reasons include deliverability concerns given market conditions and challenges for non-core office locations, the need for smaller commercial building heights and floorplates again in terms of viability, and also new site constraints that have been identified over the course of the masterplanning process.
- 5.19. This justification is sound and again, it is considered that a compelling case could be made for these floorspace areas in the context of a specific planning application. Further demonstration is needed regarding the impact on jobs numbers and how economic benefits will be maximised, which will be provided in due course.

E. The alignment of the east-west bridge which differs from that proposed in the Old Oak West SPD

- 5.20. The Old Oak West SPD sets out an indicative location for the east-west bridge to the north of the Kildun Court site. The Illustrative Masterplan proposes to re-align the bridge southwards to instead cross the Kildun Court site, noting that the Delivery team has now acquired this building which is affected by the HS2 tunnelling.
- 5.21. The main justification provided for the re-alignment is that a more direct link would be created between Old Oak Common Station and Victoria Road than would otherwise be possible. It is also understood that it would allow for shorter journey saving times; works better with HS2, Network Rail and UKPN constraints; enables access from the bridge to Midland Terrace; and also enables a more effective interchange with the potential future Old Oak Common Lane Mildmay Line and West London Orbital station.
- 5.22. Realigning the bridge as proposed would reduce the impact to Midland Terrace, but would have a greater impact on Wells House Road. This includes the demolition of two existing houses on Wells House Road. The Delivery Team has demonstrated that this would be unavoidable if the required bridge specification were to be delivered in the proposed location. The Delivery Team has also acknowledged the importance of minimising and mitigating amenity impacts to the remaining properties along Wells House Road as far as possible. This includes the proposal for a pocket park and planted buffer zone in the location of the demolished houses. The intentions here are supported in principle, although until detailed designs for the bridge and surrounds are developed, the extent of mitigation required is not known.
- 5.23. The advice received through the Delivery Team's early market engagement, as well as feedback from the Place Review Group panel, is that the east-west bridge, including its role in connecting the 'Old Oak Line', is critical to the delivery of the Old Oak Town Centre and the wider masterplan. The OPDC Planning Team agree with this advice.
- 5.24. Overall, given the above, officers are supportive in principle of the proposed bridge re-alignment, recognising the substantial benefits associated with it. Notwithstanding, the visual and amenity impacts in respect of the remaining Wells House Road properties would need to be carefully tested as detailed designs for the bridge emerge at a later stage.

Design options for the east-west bridge

- 5.25. Related to the above, the Delivery Team's preferred design option for the east-west bridge is a 3-span arch bridge which connects the HS2 Park with Acton Wells Park. The stated benefits of this option include the direct connection into the HS2 Park which removes the need for pedestrians and cycles to cross Old Oak Common Lane; as well as the landscaping opportunities associated within the preferred option, and its prominence in views from the station which aid legibility.
- 5.26. Officers acknowledge these benefits, however, the view of the OPDC Planning Team will be dependent on more detailed designs at a later stage which would establish the visual and amenity impact to Well House Road properties, including at nighttime once lighting options are more considered.

F. The relocation of the proposed leisure centre to the Old Oak town centre from the Canalside neighbourhood where it is illustratively identified in the Old Oak West SPD.

- 5.27. The justification provided includes increased accessibility to employees and residents, proximity to existing residents such as those in North Acton, and ultimately the viability of the leisure centre. Officers accept this in principle and consider that a new leisure centre of exceptional quality has the potential to provide a compelling anchor/catalyst use for the town centre.

Conclusion: Land use considerations

- 5.28. Subject to further information and justification regarding some of the identified policy deviations, such as building heights, the OPDC Planning Team support in principle the site-wide principles, strategies and land use approach that underpins the Illustrative Masterplan. It is considered that the justification regarding the deliverability of commercial floorspace and clusters in Old Oak Town Centre is particularly robust.
- 5.29. Overall, it is considered that when assessing the masterplan as a whole, and taking account of the benefits of the scheme which will be confirmed at a later date, the Illustrative Masterplan proposals are capable of being in accordance with the Local Plan when development proposals are considered in the context of specific planning applications.

Heights and massing

- 5.30. Paragraphs 5.10-5.12 above set out information on building heights in respect of deviations from planning policy.

- 5.31. The overall site-wide approach to building heights is supported in the context of the Illustrative Masterplan, and the principle of varying heights across the masterplan area is in accordance with the Local Plan and the Old Oak West SPD. This includes the concepts of two main tall building clusters and transitional clusters; focusing greater height in the Old Oak Town Centre cluster with comparatively lower heights in the Canalside Neighbourhood cluster; and stepping down buildings to respond appropriately to sensitive locations including heritage assets and small-scale residential developments.
- 5.32. The Illustrative Masterplan sets out a site-wide approach to landmark buildings which includes 'arrival' landmarks, 'park' landmarks and railway markers. Whilst the rationale for some of these landmarks needs to be developed, officers accept the approach in principle. It is understood that the principles will be secured in the Framework to ensure that the landmark buildings come forward as intended in design terms.
- 5.33. Officers have not commented on the massing of individual buildings. However, it is acknowledged that the approach to massing generally appears to be appropriate in the context of the Illustrative Masterplan, with buildings showing a positive response to context and a reflection of land use. Officers also welcome examples in the Illustrative Masterplan where interest is created through varied building forms and roof forms.
- 5.34. It is understood that microclimate, daylight, sunlight and overshadowing assessments have been carried out iteratively to inform the masterplan evolution. This is noted, however, with the exception of images showing overshadowing impacts to the main parks, this evidence has not yet been provided.

Design

Landscape and parks

- 5.35. The approach to landscape is comprehensive. The emphasis is on a connected landscape made up of the three main parks, small open spaces, green streets and landscape corridors which are important biodiversity spaces. Existing open spaces, such as the role of Acton Cemetery and Wormwood Scrubs, is also considered. Officers particularly support the 'sunny banks' in the southern part of the masterplan, allowing residential developments along the railway embankment to benefit from excellent views, sunlight exposure and access to nature.
- 5.36. The Delivery Team has stated the aim of exceeding, but at least meeting, the Local Plan's minimum target of 30% of developable area being provided as

publicly accessible open space. This is welcomed, although detailed metrics have not yet been provided, and will be provided in due course.

- 5.37. More detailed landscape proposals are provided for Channel Gate Park and Acton Wells Park, with attention given to play and recreation, movement, flood attenuation and landscape design. While these proposals are indicative, the approach is comprehensive and well-considered. Proposals accord with the Public Realm and Green Infrastructure SPD.
- 5.38. In particular, Acton Wells Park, despite being the smaller of the main parks, is considered by the OPDC Planning Team to be strategically important in terms of serving the commercial centre, Park Royal, and new and existing residents. As such, the landscape design needs to work very hard. In particular, officers welcome the concept of integrating play into the east-west bridge landing which could become a destination play feature.
- 5.39. Landscape principles will be secured in the Framework. Officers have commented that these should include objectives relating to industrial and cultural heritage; equity, diversity and inclusion; microclimate; and how public spaces will respond to the needs of existing communities. It will be also important that the Public Realm and Green Infrastructure SPD policies and principles are carefully considered as the landscape design continues to evolve.

Streets

- 5.40. The proposed street hierarchy accords with the Public Realm and Green Infrastructure SPD. The street sections are also supported in principle and incorporate SuDS and trees, segregated and predominantly bi-directional cycle paths (i.e., where cycles following the direction of traffic) and wide pavements. Officers commented that kerbside areas should not solely be used for planting and need to accommodate a range of street furniture to accord with the Public Realm and Green Infrastructure SPD. This has been addressed in the development of materials.
- 5.41. Overall, the street design principles are supported and would provide a high-quality streetscape while also supporting the Healthy Streets for London vision set out by TfL.

Architecture

- 5.42. Detailed architectural detail is not yet developed given the scope of the Illustrative Masterplan, however, it is understood that design, including some

elements of architecture, will form part of the principles secured in the Framework.

- 5.43. The imagery and visualisations that are provided help to demonstrate how local character could be reflected in the design of developments, showing a variety of building forms and roofscapes, façade detailing, prominent ground floor frontages and distinctive building tops. Overall, the images depict a high quality, diverse and visually interesting urban character. This is supported and sets the expectation for high quality architecture to be delivered at later stages.

Heritage

- 5.44. Local Plan Policy D7 'Heritage' sets out that proposals should (a) conserve and enhance the historic environment; (b) great weight will be given to the conservation and enhancement of the significance of designated heritage assets, including their settings; and (c) proposals should reflect in their design a positive response to non-designated heritage assets and avoid an unjustified adverse effect on the significance of non-designated heritage assets.
- 5.45. London Plan Policy HC1 sets out that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 5.46. The NPPF (2024) states that 'in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.

Conservation areas

- 5.47. In the north of the masterplan area, officers accept in principle the rationale of stepping down building heights towards the Old Oak Lane conservation area, as well as the range of building heights adjacent to the Canalside and Grand Union Canal conservation areas.
- 5.48. Notwithstanding, the heritage impact of proposed developments adjacent to conservation areas, including the Ursula Lapp, Collins Motors and Lords Builders Merchant sites and on South-West sidings, is not yet fully understood and would need to be considered in the round as part of a detailed Heritage,

Townscape and Visual Impact Assessment submitted as part of specific planning applications. It is also of note, however, that the existing buildings on the aforementioned sites in the setting of the Old Oak Lane conservation area are considered to make a negative contribution to the setting of this heritage asset.

Non-designated heritage assets

- 5.49. The illustrative Masterplan proposes the demolition of two adjacent locally listed buildings located along Old Oak Lane - Victoria Terrace and Willesden Junction Maintenance Depot.
- 5.50. Regarding Victoria Terrace, the OPDC Local Heritage Listing (2020) states that the group of four late-Victorian terraced houses are a 'Tyneside Flat' typology that were originally built as workers' housing, possibly for employees of the Willesden Paper & Canvas Works or the North & South West Junction Railway, and are therefore partly valued for their historical associations.
- 5.51. The Willesden Junction Maintenance Depot is a 1960s brutalist building, however, it is of note that this building is allocated for development in Local Plan site allocation 2. As such, the assessment below relating to this building needs to consider this designation.
- 5.52. The policy tests relating to non-designated heritage assets are set out in paragraphs 5.44 to 5.46 above. Importantly, the NPPF requires a 'balanced judgement' having regard to the 'scale of any harm or loss and the significance of the heritage asset'. The Local Plan sets out, within the supporting text of policy D7, a sequential approach to protecting non-designated heritage assets which follows these steps:
 - a. Respond positively to the significance of an asset in terms of design, which might include massing, land use or materials etc.
 - b. Avoid unjustifiable harm to an asset.
 - c. Should justifiable harm to an asset be identified, a clear justification should be provided that sets out how the proposal delivers public benefits, including securing its optimum viable use.
 - d. For proposed demolition of all or part of an asset, a clear justification is required that all reasonable attempts have been made to retain all or part of the asset. Where a proposal has successfully justified demolition of all or part of a non-designated heritage asset, it should demonstrate in its design how it exhibits the significance of the asset. This could include the re-use of the demolished asset's materials and/or responding to the asset's form or details in the design of replacement development.

- 5.53. The Delivery Team has prepared a statement of significance and a case for redevelopment of Victoria Terrace is under preparation.
- 5.54. OPDC as LPA does not have sufficient information at this stage to provide a definitive position in respect of Victoria Terrace. At the planning application stage, the applicant will be required to satisfy the above tests and to make the case for any harm or demolition of the locally listed building.

Transport and movement

- 5.55. The Illustrative Masterplan sets out a car-free proposal with the exception of blue badge parking; also that 95% of trips are forecast to be made by sustainable modes. This ambition is supported in principle.
- 5.56. The OPDC Planning Team are also supportive of the overall vision to create a well-connected place with improved active connections, including segregated cycle paths, new public transport opportunities and integration with the wider OPDC area. The proposals have been designed not to preclude delivery of the West London Orbital Station. It is considered that the approach to movement set out in the Illustrative Masterplan is sound.
- 5.57. The masterplan sets out principles to optimise active frontages, servicing strategies and blue badge parking in order to minimise the use of basements which can be carbon intensive. Officers accept in principle the approach of seeking to minimise the use of basements where possible, however, it is considered that a balance needs to be struck where doing so might have a detrimental impact on the public realm.
- 5.58. In terms of blue badge parking, the design team sets out the case that the London Plan requirements for off-site blue badge parking might negatively impact on the quality of the public realm adjacent to plots. Officers appreciate that there are sometimes competing priorities, however, being a masterplan-scale development, the London Plan (policy T6.1 'residential parking') should be the starting point for discussions regarding blue badge parking, and officers have suggested that further consultation with OPDC Transport and TfL will be required.

Bridges

- 5.59. Refer to paragraphs 5.20-5.26 above for information regarding the east-west bridge.
- 5.60. In terms of the Channel Gate bridge (Old Oak West SPD ref: TV15), the delivery team explored different locations for this bridge, and whilst the preferred option differs from the indicative location in the Local Plan, officers

consider that the new location is appropriate and would provide the desired direct access into Channel Gate Park. Officers requested details of how the bridge would land and interact with the park; also how the bridge area would be activated to enable safe use at night. This information will be provided in due course. The OPDC Planning Team also accept that this bridge is designed for pedestrians and cycles only.

- 5.61. Turning to the bridge connecting to North Acton Station (SPD ref: TP20) which is identified in the Local Plan and Old Oak West SPD, the Delivery Team has stated that this bridge does not form part of the Illustrative Masterplan given that the benefits associated with it are negligible, also that improvements to Chase Road and Victoria Road will sufficiently link the masterplan area to North Acton. Notwithstanding, it is stated that the Illustrative Masterplan proposals do not preclude the delivery of this bridge in the future.
- 5.62. Officers acknowledge the delivery challenges associated with this bridge, however, its non-delivery raises the challenge in respect of how Old Oak can successfully integrate with North Acton, and this will need to be carefully considered.
- 5.63. There are other bridge connections to neighbouring areas identified in the Local Plan and the Old Oak West SPD. Again, it was clarified by the Delivery Team that they do not seek to preclude these bridges from being delivered in the future, but they are not proposed as part of the Illustrative Masterplan. This is accepted however officers suggested that the indicative position of these bridges should be identified regardless, which would help to demonstrate that their future delivery is not precluded.

Matters not fully discussed

- 5.64. Given the level of detail expected to be included in the Illustrative Masterplan at this stage of the proposals, detailed information on the following matters is not yet available, and therefore, they were not discussed in the pre-application meetings. Notwithstanding, we understand that these matters have been considered as part of the iterative masterplanning process and should be capable of being resolved:
 - **Housing** – affordable housing, housing mix and tenure, quality of residential accommodation.
 - **Urban design** – massing proposals and detailed comments on townscape and heritage impacts.
 - **Transport**: details regarding the impact on the transport network; servicing arrangements; and car and cycle parking.

- **Amenity:** privacy and overlooking; daylight, sunlight and overshadowing; noise and vibration; wind microclimate; construction impacts.
- **Environment:** energy efficiency/climate change; air quality; flood risk and water management; waste management, ecology and biodiversity.

6. Summary and Next steps

- 6.1. The masterplan is a helpful document illustrating the potential for future development of the area and its benefits are recognised. There are some areas where the proposals are not fully in accordance with the Local Plan as identified in this report, but it is also recognised that the document will evolve and that the question of accordance with the Local Plan will be one for consideration by the Planning Committee in the context of any future planning application.
- 6.2. Overall, noted when assessing the Illustrative Masterplan as a whole, and taking account of the benefits of the scheme, which will be confirmed at a later date, there is the potential for the proposals to be deemed to be in accordance with the Local Plan.
- 6.3. The Illustrative Masterplan will be considered by OPDC's Board at its meeting on 11 July 2025. Further work will continue over the summer and a 'Masterplan Framework' will be reported to September Board for adoption as a corporate OPDC document. It will also be reported to September Planning Committee beforehand for comment.

7. Equality comments

- 7.1. The Human Rights Act 1998 incorporated into domestic law the European Convention on Human Rights (ECHR). The ECHR includes provisions in the form of Articles which aim to protect the rights of the individual.
- 7.2. Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way which is incompatible with the ECHR.
- 7.3. Article 1 of the first protocol of the ECHR states that 'every natural or legal person is entitled to peaceful enjoyment of his possessions' and that 'no one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by the law and by the general principles of international law....'.
- 7.4. Other relevant provisions include Article 6 (1) in relation to civil rights and a fair hearing; Article 8 in relation to the right to respect for private and family life; and Article 1 Protocol 1 in relation to the protection of property.

- 7.5. As a public body, OPDC is also bound by the public sector equality duty in section 149 of the Equality Act 2010. This places a legal duty on OPDC, including in its capacity as local planning authority, to have due regard to the advancement of equality of opportunity in the exercise of its powers. In particular, due regard must be paid to the need to:
- eliminate unlawful discrimination, harassment, victimisation;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 7.6. When OPDC's Planning Committee is asked to determine a planning application(s) for the finalised proposals as currently set out in the Illustrative Masterplan, members will need to, along with the Development Plan and other relevant material considerations, consider OPDC's public sector equality duties and Human Rights Act 1998 considerations when making their decision.
- 7.7. In order for the development shown within the Illustrative Masterplan to be delivered comprehensively, land that is not currently within the ownership of OPDC will need to be acquired. If such land cannot be acquired by agreement it will need to be acquired compulsorily via a compulsory purchase order.
- 7.8. OPDC has powers to acquire land compulsorily and in the event that it proposes to do so that process is governed by legislation and informed by Government guidance. Whilst the decision to make a CPO would not be for OPDC's Planning Committee, in summary terms OPDC can use its compulsory purchase powers where it is expedient to do so and where there is a compelling case in the public interest to make a compulsory purchase order. It will be for OPDC, acting in its capacity as acquiring authority, to make this case and in due course seek confirmation of that decision from the Secretary of State. The statement of reasons for the CPO will need to set out OPDC's justification for compulsory purchase with regard to Human Rights considerations and how its public sector equality duty has been taken into account in making the compulsory purchase order.

8. Financial implications

- 8.1. All pre- application costs have been met by the OPDC Delivery Team via a Memorandum of Understanding with the Planning team.
- 8.2. Any subsequent planning application will be expected to secure contributions via a section 106 agreement for matters such as employment and skills,

affordable workspace and construction management. Any subsequent planning application will also be liable for Mayoral and OPDC Community Infrastructure Levy.

9. Legal implications

- 9.1. In its role as local planning authority the OPDC welcomes the development of this Masterplan but retains full discretion to exercise its discretion in the determination of future applications.
- 9.2. This report is consistent with the Corporation's legal framework.

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