



Emma Williamson, Director of Planning
 Gareth Blacker, Executive Director of Delivery
 OPDC (Via email)

Date 1st December 2025

Dear Emma and Gareth,

OPDC Masterplan Framework – discussion at OPDC Board 20th November and content of final Masterplan Framework document

This is a follow up to my letter of 16th November and to the discussion at the Board on 20th November.

A webcast recording of the 20th November Board has now been published, after the technical problems which arose on the day, and I have been able to watch this.

This includes Emma's explanation at the start of her Planning report, on the legal status of the new Masterplan Framework. It was explained that the Board's decision to endorse this document would reflect the Board's 'corporate' role in overseeing a London planning authority and a delivery agency. But her assurances to the Board some questions unanswered from my previous letter.

OONF will be holding its December Zoom meeting on Thursday 4th December. This will be discussing the Masterplan and OPDC's next steps. **It would be very helpful to have some clarification in writing on the points below:**

The Masterplan Framework document

Firstly, it would help to be clear what exactly makes up the Masterplan Framework?

We assume that this is the version of the document published along with the Board agenda, as an appendix to Item 14? The first version of this PDF proved hard for the public to download. As subsequently explained by James Varley, this was because the file size was over 160MB. He explained that *this is why we were unable to host it on the board / Committee papers section of the website and given the need to publish the meeting papers by the statutory deadline, the only viable option was to upload it to the Adobe cloud.*

To overcome this problem the document was republished as four separate PDF files ranging from 12 to 24MB in size. Given OPDC's current focus on this Masterplan, to publish it only in this way reinforces resident perceptions that the Corporation sees the development market, rather than local people, as its primary audience.

Can we have confirmation that the 200 pages in the four appendices make up the final standalone Masterplan Framework, subject to any final edits agreed by the two Directors as delegated by the Board? And that this publication is to be issued in this form as part of the procurement exercise for one or more Master Developers at Old Oak?

The Framework document is as long as many Local Plans. It reads like a Local Plan. And we fear that many people will be misled into thinking that it replaces the 2022 OPDC Local Plan. Pages 1-7 include similar aspirational content on what will happen in the project area to that in the OPDC Local Plan.

Page 8 in particular refers to the document being ‘informed by’ a series of other documents including the London Plan and Local Plan – thereby suggesting a linkage to the statutory development plan process. As the ‘newer’ document many people will assume that ‘Masterplan’ content replaces Local Plan content, unless it is made very clear at the start of the document that this is not the case.

Emma’s statement to the committee ended by saying that the Framework is capable of being a material consideration. Where there is sufficient alignment with Local Plan policy, we accept this position. But the fact remains that the Framework has not been the subject of Regulation 18 and 19 consultation requirements, and an independent examination, to which our Forum members devoted a huge amount of time in the years from 2016 to 2022.

Hence we are very alert to where the detailed drafting of the Framework reads as if its authors felt they had a free hand in redesigning the project area from a blank map. **We see much more extensive policy divergence from the Local Plan than the document appears to recognise.**

We noted Emma’s comment at the Board that it would be irresponsible for her to make predictions at this stage on the extent to which the Framework will have significant (or limited) weight as a material consideration. **We see it as equally irresponsible** for the document to be published in a form that includes the page 9 statement *All detailed development proposals within the Old Oak area are expected to take account of the vision, principles and guidance set out in the Masterplan Framework.*

Adherence to the content of this document should not be seen by any applicants as an assured route to a planning consent. Potential development partners in particular should surely be made aware of this context at the start of the document? The fact that OPDC seems unwilling to give this clarity simply reinforces our concerns.

Our serious concerns about this process therefore remain, for these reasons:

- The Masterplan Framework makes little effort to explain its relationship to the Local Plan (other than in the final pages in an appendix on *Consideration against Planning Policy*).

- Material in the document pays little or no heed to policies set down in the Local Plan or London Plan, which cannot be set aside or replaced with new ‘principles, vision or guidance’ other than via a further development plan document. An extensive section 6c on *Placemaking with a varied skyline* coupled with new locations for tall buildings is one example.
- Sections of the content, designed to entice development and investment interest, are simply untrue. For example this claim below, written as if it pertains in 2025 and ‘*The Place Today*’ rather than a possible future 15 years away:

Chapter 3: the Place Today. Old Oak is an exceptionally well connected with the new HS2 and Elizabeth Line station at Old Oak Common, Willesden Junction providing Overground and Bakerloo line services, and North Acton linking to the Central Line. A potential Overground station for West London Orbital and the Mildmay Line is also safeguarded at Midland Gate. All stations are within comfortable walking distance, offering convenient links to Central London and strengthening development potential. Proximity to rail corridors will, however, require consideration of noise and vibration in future development.

The most urgent questions on which we have had no response in writing to date, and on which OONF will be continuing its discussions on Thursday evening, are as follows:

- Has OPDC taken authoritative external legal advice on the potential extent to which the Masterplan Framework can be treated as a material consideration?
- Given an adopted 2022 Local Plan which has defined multiple detailed ‘Place’ policies, how can these adopted policies be subjugated to or overridden by a document which is not part of the development plan?
- At what stage is a planning application covering the Masterplan expected to be submitted to the LPA part of the Development Corporation?
- In the intervening period, and as and when the Masterplan Framework is issued to potential development partners, should it not be accompanied by a serious health warning to guard against assumptions that the content of the document overtakes or replaces that in the 2022 Local Plan? With a reminder that potential applicants must consider with care any variation or departure from the terms of Local Plan and London Plan policies, as a potential ground for refusal?
- Why has the Framework has not been prepared and progressed as a development plan document? LBE and LBHF are in the process of updating their Local Plans. This route would surely provide the greater certainty that a Master Developer seeks?

Yours sincerely,

Henry Peterson

Adviser to the Old Oak Neighbourhood Forum

Cc Dame Karen Buck, Chair of OPDC

William Hill, Chair of OPDC Planning Committee

Matthew Carpen, OPDC CEO, Marianne Williams, OPDC, Martin Harrison OPDC

OPDC Residents Panel members