



Emma Williamson, Director of Planning
OPDC (Via email)

Date 8th February 2026

Dear Emma,

Status and material weight of the OPDC Masterplan Framework

Thanks for your email of 4th February on the above. This responded to my letter of 9th December to you and Gareth Blacker and formed part of a correspondence which dates back to 16th November 2025.

I am replying further via letter rather than email, and will explain at the OPDC Residents Panel on the 12th why OONF is pursuing this subject in a formal manner rather than e.g. over the phone.

Your latest email arrived in time for its content to be discussed at the OONF and GUA meeting on 5th February.

You answered in turn each of the queries on my 9th December letter and for the sake of completeness and copy addressees I will do the same - using your headings that listed the queries or points that I raised (in bold italic) and your full response text (in blue).

(HP) stated that the position regarding the significance and weight of the Masterplan Framework for potential developers and applicants and also for residents at Old Oak, is very unclear.

(EW) Advice on the material weight of the Masterplan Framework will be provided in the course of pre-application discussions on sites within the Masterplan Framework area.

As we have set out previously, the weight to be given to any material consideration will be considered at the time of a decision. There are a number of factors that could influence weight including the status of, and alignment with, national, strategic and local policy at the time of considering a planning application.

We still do not see how the Framework document can meet the expectations placed on it, as expressed in the reports to the OPDC Planning Committee and Board last November.

Paragraph 4 of the report to the Board on November 20th starts with the now familiar refrain that *The Masterplan Framework is intended to be a material consideration in the*

context of future planning applications, with the weight afforded to be determined at the time of respective planning applications and at the discretion of the LPA.

We are not disputing that the Framework document *could* be a material consideration, particularly where its content aligns with the Local Plan and The Old Oak West SPD. But the report goes further than this in asserting at 4.6 that *The Masterplan Framework will support the procurement of a development partner, not only by setting out our vision and brief for Old Oak but also providing prospective development partners a degree of certainty on the development principles, guidance and planning policy deviations that have been discussed and agreed with the LPA through a formal pre-application process.*

As explained below, **we consider that any ‘degree of certainty’ will be limited**, given that the Framework is a non-statutory document prepared (and ‘endorsed’ by the Board) outside the framework of the PCPA 2004, as modified by the Levelling-Up and Regeneration Act 2023.

The conclusion of the Board report (paragraph 9.1) states *As a material consideration for future planning applications, the Masterplan Framework provides a clear framework to ensure that the future development of Old Oak is brought forward comprehensively and maximises the regeneration benefits for both existing and future communities.*

We do not see how a document which will require a whole series of judgements to be made the Planning Committee in future years, on the level of material weight that can be derived from the Masterplan (for which the committee’s ‘discretion’ will need to be applied in a rational and contextual manner) can be claimed to be a ‘clear framework’.

Publication of the notes of the five pre-application sessions reported as having been held might change our views. **Are these notes to be made public (as they presumably would were the Masterplan to be handled as a single application)?**

(HP) asked where OPDC obtains its legal advice and whether this advice can be made public, and who reviews and makes legal input to officer reports.

(EW) TfL’s legal department provides legal advice to OPDC and reviews committee and board reports. OPDC Planning is taking advice from Pinsent Masons on the Old Oak Masterplan and Masterplan Framework. This advice has generally taken the form of meetings and discussions. As previously advised OPDC will not be sharing any written legal advice and it is legally privileged.

We remain unhappy that OPDC takes this position. The weight to be applied to a non-statutory masterplan is a matter of significant public interest. It is worrying if the MDC is not willing to defend the position it has taken on this question.

(HP) queried the development management impact of OPDC’s decision to endorse the Masterplan Framework from now onwards, on the interpretation of Local Plan Place policies P7, P8 and P9 and the policy guidance in the adopted Old Oak West SPD

(EW) The weight to be attached to the Masterplan Framework, relative to adopted policy contained within the statutory development plan, will be considered in the course of pre-application discussions and at application stage.

This response takes us no further. We were simply pointing out that the interpretation of 2022 Local Plan policies for the area within the Masterplan boundary vary from 'Place' to 'Place' and asking if OPDC has explored and reached conclusions on how this unusual scenario is to be addressed as and when future applications reach decision stage.

(HP) stated that there will be a stage when the Masterplan Framework is submitted to the LPA as a planning application.

(EW) At this stage it is not envisaged that the masterplan will be submitted as one application. It is more likely to be a series of applications which will be submitted by OPDC as Delivery Agent and its future developer partner. The scope and programme for future planning applications will be finalised after the appointment of a developer partner to ensure that these are coordinated and supportive of the comprehensive regeneration of Old Oak.

This is helpful clarification and confirmation, which was discussed at our Forum meeting on the 6th. Re-reading past committee reports these included comments which we previously interpreted as indications of a future 'single masterplan application'. I accept that the draft minutes of the November Residents Panel say 'noted that the Masterplan Framework was an iterative document, not a planning application, setting out a vision for the direction of travel'. So I am sorry for getting that point wrong.

Wordings that had led us to think there might be a single outline application for the masterplan were:

- The report to the June 19th Planning Committee (the first occasion on which the Framework was discussed) stated *pre-application discussions on the Illustrative Masterplan have been held between OPDC's Planning and Delivery teams.*
- The heading **Scheme Description** is used at section 4 of this report, with a map showing a clearly delineated boundary for this 'scheme'.
- In relation to 'anchor uses' 5.6 of the report uses the language *It is understood that further information will be provided in due course and will be secured within the Framework.* What is meant by 'secured' in this context?
- The (detailed) minutes of this June meeting (which I watched online) record at 5.5 that *The Team Leader (Development Management) delivered a presentation that provided **an overview of the pre-application process** and a summary of the officer's advice.* Referring to a 'pre-app process' made me think this was now concluded prior to application submission, rather than being a continuing dialogue

We still think that more clarity is needed within a Framework document which is iterative, non-statutory and yet purports to set ‘planning parameters’ to which all future applications should ‘take account of’. How can the document combine these features? We have identified the two paragraphs on page 9 with which we have a major problem and have had no answer to what is meant by ‘*the original intent*’ in the second of these. The Masterplan also seeks to ‘create new policy’ in terms of suitable locations for Tall Buildings and the location of a major town centre. We raised the same objection to wording used in the draft Old Oak West SPD and this was amended in the final version.

We can understand a possible case for *not* using this route (to retain flexibility in future years?). But we do not see how OPDC can attempt to have the best of both worlds -- in endorsing a non-statutory masterplan while also ‘expecting’ all detailed development proposals to take this into account as some form of successor to the adopted Local Plan? If OPDC is pursuing this route, the legal implications need to be much clearer than as set out in the present introduction to the document.

(HP said he) believed that the Masterplan Framework will not carry significant material weight.

(EW) As previously stated, we consider the Masterplan Framework is capable of being a material consideration but ultimately the weight ascribed to it will be a matter for the decision maker at the time. We have corresponded extensively on this and I think we are going to have to agree to differ.

Repetition of this formulaic sentence does answer the inevitable question from developers and the public: *how significant a material consideration?* We continue to research this question via various sources of advice. Our understanding is that a non-statutory ‘masterplan framework’ which has not been prepared as a development plan document:

- cannot be determinative in the manner of the OPDC Local Plan (2022), the London Plan, or borough Local Plans are.
- can be a material consideration, but its weight is discretionary and context dependent.
- as a material consideration will generally carry only limited weight. It cannot override the development plan and cannot be used as the primary basis for conditioning applications (which is surely important)?

We did not get responses to the points raised in my letter of 9th December to Claire O’Brien, in relation to the *Tottenham Hale District Framework* and the *Tottenham Strategic Regeneration Framework Delivery Plan*. We had been referred to these documents as similar models to the OPDC Framework document and pointed out that LB Haringey’s Assistant Director of Corporate Governance had commented at the time that *The Framework Delivery Plan itself is not a formal Planning document and consequently will not form part of the statutory development plan. While it will be a*

material consideration, it will not carry significant weight in the development management process.

We are finding that carefully framed questions of AI systems such as ChatGBT to be useful. We are not claiming this source as being authoritative legal advice, but AI does generate fact-based content that makes clear the differences between the OPDC approach and other examples in London.

The regeneration of Kings Cross is frequently cited as one of London’s most successful examples of regeneration. Having interrogated Chat GBT with a series of ‘deep dive’ questions the short summary below is an extract from longer and detailed analysis:

How King’s Cross compares to Stratford City, Brent Cross, and OPDC

1. Planning Strategy: Outline vs Hybrid vs Iterative

Scheme	Initial Planning Approach	Parameter-Setting Strength	Notes
King’s Cross	Single outline planning application (2006) covering the entire 67-acre site	Very strong – fixed development zones, heights, land uses, design codes	Classic “masterplan + RMAs” model; highly controlled and predictable
Stratford City	Hybrid application (2004–2005): outline for most plots, detailed for key infrastructure	Strong but more flexible than KX	Needed to integrate with Olympic works; multiple landowners
Brent Cross Cricklewood	Hybrid application (2010) with multiple parameter plans	Moderate – parameters set but repeatedly revised	Retail-led scheme required major re-phasing and redesign post-2015
OPDC	No single outline application; relies on Local Plan + site allocations + future hybrid apps	Weak/fragmented – parameters not fixed upfront	Land fragmentation + HS2 uncertainty prevented a KX-style OPA

We fully appreciate that Kings Cross had Argent as a single landowner/developer with a sustained vision for the future of the area. OPDC is now a single landowner of 90% of the land involved (only slightly larger than at Kings Cross). What we don’t understand (until persuaded otherwise) is **why a master developer would not want more certainty on planning parameters than the Masterplan Framework can provide?**

Another section of this ChatGBT analysis summarises a ‘governance’ comparison between Kings Cross and OPDC in these terms: *King’s Cross benefited from a single, empowered master-developer. OPDC is the opposite: strong statutory powers but weak land control.* As of 2026, OPDC has solved its deficiency on land control, intends to use its strong CPO powers, but has chosen not to use its statutory planning powers (other than having its own planning committee deciding on applications). **Is this a fair summary of the position in 2026?**

You (HP) have asked why didn’t we do an AAP or a partial review of the Local Plan.

(EW) Given the intention to review the Local Plan after five years as required by government, it was not felt it was a good use of funds or time to progress an AAP or a partial Local Plan review and indeed it would be unlikely that there would have been sufficient time under the old system. AAP’s do not feature in the new system.

We assume that it was a couple of years ago that OPDC made a choice on whether to use a statutory or non-statutory route to underpin its delivery strategy? We have not found evidence of the options in the table above being weighed up, in reports to the Board from the Delivery team.

We accept that *AAPs do not feature in the new system of Local Plans.* Our understanding is that Supplementary Plans are a new category of statutory documents within the new Local Plan system which will:

- Form part of the development plan (unlike old SPDs).
- will be able to set detailed design codes, infrastructure triggers, phasing, public realm frameworks, and delivery requirements.
- will required to be examined, giving them more weight and rigour than legacy SPDs.

Under the new Local Plan regime, a neighbourhood plan is further statutory plan that carries the full weight of a development plan document, as we have argued in the Draft Old Oak Neighbourhood Plan, provided to OPDC in its initial form on 30th January.

(HP) stated that he has seen no equivalent of a consultation statement for the Masterplan Framework.

(EW) There is no legal requirement to produce consultation statements for anything other than Development Plan Documents and SPDs. However, an engagement report will be published alongside the final Masterplan Framework, summarising the key engagement activities, feedback and responses.

This response is helpful to know. There has been material in OPDC Planning Committee and Board reports on the extent of consultation on the Masterplan during 2025 at exhibitions, and drop-in and PlaceLab sessions.

We wait to see a finalised ‘engagement report’. We do not see that this can add much by way of ‘weight’ and underpinning to the Framework document. The masterplan proposals were presented to the public as an ‘illustrative’ masterplan. The copious illustrations provide no metrics in terms of intended net housing densities (the 2022 Local Plan was similarly deficient in this respect). The published document gives no housing unit numbers for newly allocated sites, and only limited information on building heights (requiring the public to count floor numbers from drawings, in most cases).

Only at the final stages of Planning Committee and Board consideration did it emerge that the document as endorsed by the Board on November 20th 2025 would include a set of ‘planning parameters’ and the key statement *that 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.*

We still await confirmation as to whether this statement will remain or be removed, in the ‘final version’ of the Framework document, publication of which was promised ‘in the New Year’. Responsibility of the ‘delivery’ and ‘LPA’ arms for the content of ‘corporate’ document (as it was described at the November Panel meeting) remains unclear.

(HP) asked for copies of the meeting notes with the boroughs to be published.

There are no available minutes from the meetings with the boroughs.

This is disappointing. As we have commented in the past, the [2014 Mayoral response](#) to the consultation on establishing the MDC at Old Oak *envisaged a Senior Officers group that the MDC team would bring reports and work to for review and discussion.* Local residents assumed that such a body would have agendas and minutes which the public could access. No such body has emerged.

As things have turned out, local people see no evidence that OPDC and the three Borough meet regularly or at all, either collectively or individually. Attendance of Borough Leaders at OPDC Board meetings has been patchy in recent years. Attempts in future to claim significant material weight for the Masterplan Framework will be weakened by this absence of a documented track record of liaison with the Boroughs.

You say in your letter that *we are going to have to agree to disagree* on the subject of the material weight of the OPDC Masterplan Framework. So be it, if this is the last word on the subject from the Development Corporation. OONF will continue to argue that the present Framework document, when put to the test on major applications, **should be given no more than limited weight** (except on proposals with strong compliance with 2022 Local Plan policies).

OONF will make this case through whatever means are open to us, including a repeat of our efforts in 2021/2 to lobby the London Assembly for an independent review of OPDC’s track record and future strategy and plans.

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

James Small-Edwards AM and Chair of the London Assembly Planning and
Regeneration Committee

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