

## OPDC consultation responses on the Draft Old Oak Neighbourhood Plan

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To: Peter Farnham, Marianne Brook

Cc: Matthew Carpen, William Hill, Martin Harrison, Grand\_Union\_Alliance, Gareth Blacker, Emma Williamson

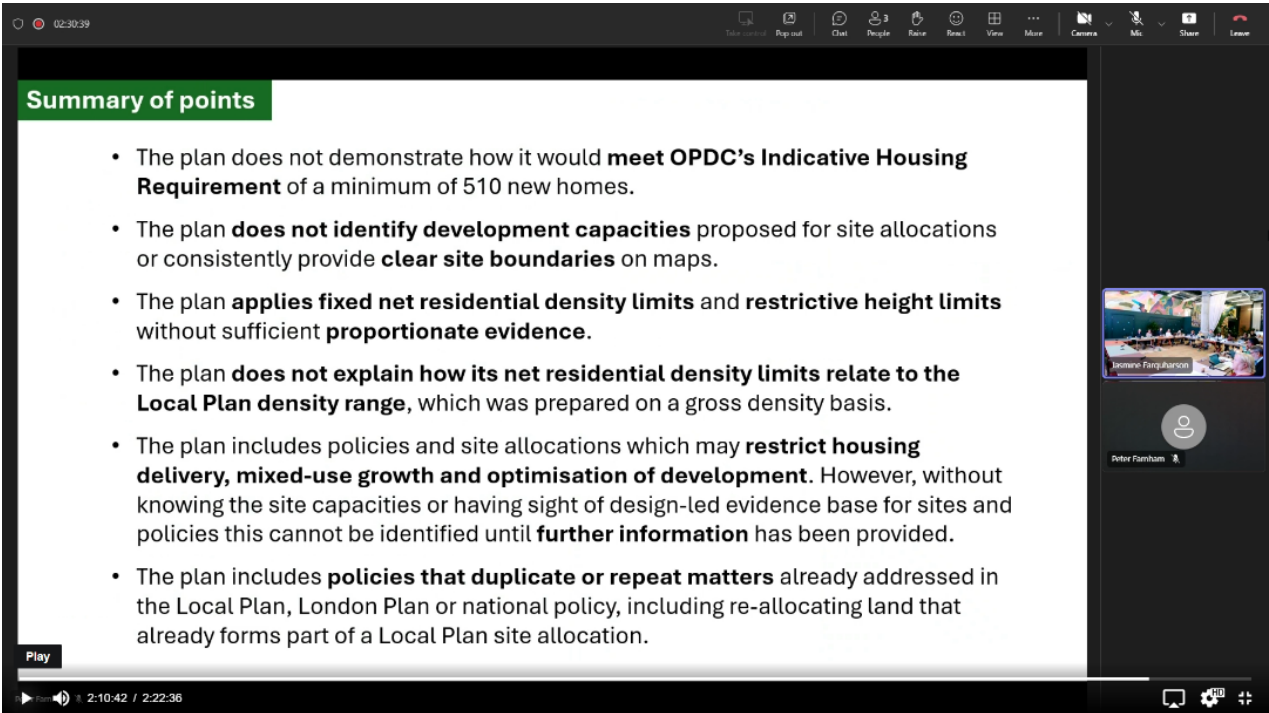
Date: 13 Sept 2026, 16:08

Dear Peter and Marianne,

I watched the recording of the Planning Committee discussion at last Thursday's meeting, and have no problem with much of the Chair's summing up, or with the conclusion that it makes sense for the committee to focus its time on reviewing the content of the next version of the Draft NP at submission stage.

But I do need to question immediately an important aspect of the responses from OPDC as LPA and as Delivery agency, and the presentation to the committee. This relates to the Draft Plan's proposals on net residential densities for the four development sites within the Old Oak neighbourhood boundary.

The slide below was used as part of Peter's presentation. The fourth bullet summarises comments made by OPDC on the neighbourhood plan's residential density proposals. These are a key part of the Draft Plan in terms of the stage of independent examination, as one of the two major points of difference between the Forum and OPDC



The screenshot shows a video conference interface. The main window displays a presentation slide titled "Summary of points" with a green header. The slide contains six bullet points. The top toolbar includes icons for "Take control", "Pop out", "Chat", "People", "Raise", "Raise", "View", "More", "Camera", "Mic", "Share", and "Leave". The sidebar on the right shows a list of participants, including "Jacqueline Farnham" and "Peter Farnham". The bottom of the window shows a "Play" button and a progress bar with the time "2:10:42 / 2:22:36".

**Summary of points**

- The plan does not demonstrate how it would **meet OPDC's Indicative Housing Requirement** of a minimum of 510 new homes.
- The plan **does not identify development capacities** proposed for site allocations or consistently provide **clear site boundaries** on maps.
- The plan **applies fixed net residential density limits** and **restrictive height limits** without sufficient **proportionate evidence**.
- The plan **does not explain how its net residential density limits relate to the Local Plan density range**, which was prepared on a gross density basis.
- The plan includes policies and site allocations which may **restrict housing delivery, mixed-use growth and optimisation of development**. However, without knowing the site capacities or having sight of design-led evidence base for sites and policies this cannot be identified until **further information** has been provided.
- The plan includes **policies that duplicate or repeat matters** already addressed in the Local Plan, London Plan or national policy, including re-allocating land that already forms part of a Local Plan site allocation.

When first reading the two sets of OPDC comments, I was very surprised to read the claim that the OPDC Local Plan density range **was prepared on a gross density basis**.

Ever since the Forum commented on the Regulation 18 OPDC Draft Local Plan, we have consistently asked that that Local Plan site allocation capacity figures are accompanied by

density figures. We have always understood that net rather than gross residential density figures were being used by OPDC for site capacity work. The Local Plan was prepared in the days when net residential density was defined (and routinely used) as part of [London Plan Policy 3.4 on Optimising housing density](#). We pursued requests for density metrics at length with the Inspector during the EIP.

So it has been startling to read these latest comments, including on the slide above, that the brief reference to housing density in the 2022 Local Plan (Policy SP9 paragraph 3.78) was intended to refer to **gross** rather than **net** residential densities. This Local Plan paragraph includes the sentence *The indicative density range is 300 to 600 units per hectare*. When we have recently asked what density levels were used in the brief to Gort Scott on the Masterplan Framework, we have been referred back to this (wide) numerical range.

We therefore need a response that answers or explains the following:

1. Where in the 2022 Local Plan (or elsewhere in Local Plan documentation) does the text define its density range as "gross" when relevant GLA policy and the London Plan Density Matrix had operated for most of the plan preparation period on the basis of net residential densities?

2. At what point in the Examination in Public did OPDC make clear that its 300-600dph density range was gross rather than net?

3. How could a gross density range of 300-600 dph be realistically deliverable as an outcome across the Old Oak project area? By our calculations this would lead to net densities roughly as below. Is this now OPDC's stated intention for the Masterplan Framework?

300 dph gross → 430–500 dph net

600 dph gross → 860–1000 dph net

4. The 2021 Development Capacity Study, on which OPDC has relied in adding development sites absent from the Site Allocation table in the 2022 Local Plan, is not explicit on whether capacity figures are based on gross or net residential density. But all the comparative figures shown (including those from precedent developments consented by OPDC) appear to be based on the then standard GLA methodology for calculating net rather than gross density, shown as dwellings per hectare. What is the explanation for OPDC apparently now moving to a gross density basis?

Please rest assured that the treatment of housing density in Policy OONA 1, and in individual site allocation policies, will be substantively revised for the Submission Version of the Old Oak Draft NP. These changes will result from the content of the August 17th NPPF on minimum densities nationwide (of limited applicability in London), from the Government's 2026 Design & Placemaking guidance and its new national definitions of

'developable area' and net residential density, and from the Draft London Plan proposals to defer to this new methodology as a standard approach.

So the figures on site densities in the Submission Version of the NP will change, but will remain **net** rather than **gross** figures.

The OPDC's LPA consultation response recommends that the Forum proceeds as below.

11.13 OPDC recommends that Policy OONA 1 and the density-related parts of Policies OONA 2C, 2D, 2E, 3A and 4A are deleted or substantially revised. Any revised policy or site allocation should be presented positively, clearly and concisely and seek to optimise housing delivery through a design-led approach, be supported by proportionate evidence, identify indicative development capacities for each allocation and demonstrate that the neighbourhood plan can meet at least the minimum Indicative Housing Requirement provided by OPDC.

We agree that figures for residential density and for site capacities should be presented clearly and concisely and will endeavour to do this for the benefit of the public and the independent examiner. We will need some further clarification of site areas for certain sites, following the information which you both provided in April.

We think it is fair to ask OPDC to apply the same standard of *clear and concise presentation* to its Old Oak Masterplan Framework, a document which includes no site specific metrics (except for site capacities indicated in May 2026 Position Statements, which have not been made public via the OPDC website).

As made clear in the Pre-Submission Draft Plan, we remain of the view that an independent examiner will be assessing the Old Oak Draft NP against the 2022 Local Plan and **not** the Masterplan Framework. And that OPDC will also have some difficulties in justifying inclusion of DCS sites its Indicative Housing Requirement. The continued absence of its own proposed net residential density metrics for such sites - so that the examiner can assess the impact of OPDC plans for successful and sustainable 'site optimisation' as compared with the NP proposals -- is a point which we will be making.

For OPDC now to be asserting that the Local Plan density range was prepared on a gross density basis has huge implications. **Urgent clarification is needed on whether OPDC stands by the relevant statements in the consultation responses made by the LPA and the Delivery team, and the content of the above slide presented to the Planning Committee meeting on September 10th? Or whether there has been some confusion on gross versus net definitions?**

OPDC has taken up a public position that the Pre-submission Draft Old Oak Neighbourhood Plan is a very long way from meeting the Basic Conditions. Neither of the two OPDC responses to date addressed the content of Annexes A and B of the Pre-submission version, with an Initial Basic Conditions Statement and comments on the OPDC Indicative Housing Requirement. The same applies to the GLA consultation response to OONF. We will follow up separately on the second key issue of the validity

of the Housing Requirement, and will set out the AI generated legal advice that supports the position which the Forum has taken to date.

While the briefing to the Planning Committee covered the next stages of neighbourhood plan preparation, it was not made clear to committee members that it is the independent examiner and not the LPA who determines whether the Basic Conditions are met. We are aware of the small handful of legal cases where LPAs have refused to a plan after referendum and the narrow statutory basis on which such a decision can be made. In respect of the KC opinion from Richard Moules in April we have found little in the two OPDC consultation responses which addresses the points made in the OONF letter of May 7th (re-attached).

I am copying this to Matt Carpen and to Gareth Blacker and Emma Williamson as well as to William Hill as the Planning Committee chair.

Henry Peterson  
Adviser to the Old Oak Neighbourhood Forum



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