

Old Oak and Park Royal Local Plan examination

Agenda Session 5: Tall buildings location

Participants: Inspector, Corporation, Grand Union Alliance, HGH (Queens Park Rangers Football Club and Stadium Capital Developments) Friends of Wormwood Scrubs.

Summary of issues

- 1 Whether the locations identified as suitable for tall buildings are justified (derived from the sixteenth Key Issue of table 5 of Key document 5 identified at Regulation 19(1) stage and the thirteenth Key Issue of table 7 of Key document 5 identified at Regulation 19(2) stage and representations 2/SP9/9 from Osborne Investments, 2/SP9/15 from Midland Terrace RA, 2/SP9/16 from Wells House Road RA, 2/SP9/26 from local residents, 2/P7/14 from TITRA, 2/P10/3 and 2/D5/7 from RBK&C, 2/D5/1 from LBB, 2/D5/3 from LBH&F and 2/D5/4 from Grand Union Alliance amongst others. At Regulation 18 stage, a number of organisations were concerned about tall buildings' effects on residential amenity.)

The following summarises points made in representations about locations for tall buildings.

- 2 Policy should state that tall buildings may be appropriate near to the bridge leading to Willesden Junction Station.
- 3 Crossing points may not be best locations for taller buildings along the Canal. Tall buildings will obstruct views and vistas along the canal and use for wayfinding is questionable.
- 4 Support proposal for buildings to be 6-8 storeys (maximum) but do not agree with taller elements at node points.
- 5 Imperial College recognises the role well designed tall buildings can play in North Acton and other areas.
- 6 Policy should be more specific on location for tall buildings and should identify the Boden House site as suitable for tall buildings. Boden House should be identified as a star as a location appropriate for a tall building.
- 7 Towers in North Acton should be knocked down and replaced with buildings of lower heights.
- 8 North Acton tall buildings do not relate to surrounding context.

- 9 Policy should be amended to not preclude potential for tall buildings on the Midland Gate site. The study should recognise that the Midland Gate site is suitable for a tall building due to its location and contribution to delivering key infrastructure. Midland Gate site should be identified as a location appropriate for a tall building in principle in figure 3.15
- 10 Policy restricting one tall building in each cluster on Scrubs Lane is too restrictive, does not accord with London Plan policy 7.7 and has already been contravened by recently permitted schemes.
- 11 Evidence base for tall buildings along Scrubs Lane is not sufficient should give more consideration to the impact of tall buildings along Scrubs Lane on the St Mary's and Kensal Green Cemeteries. Policy is too prescriptive. Guidance for visual permeability should be reinstated. Policy retrofits approved decisions. Scrubs Lane Direction of Travel document was not consulted on as part of the Local Plan consultation.
- 12 Guidance for a tall building in each cluster needs further detail.
- 13 Local Plan should allow flexibility for taller buildings outside of cluster locations, in particular gateway locations such as 151 Scrubs Lane.
- 14 Support principle of tall building on corner of Scrubs Lane/ Harrow Road
- 15 Mitre Canalside Cluster Location is too sensitive with regard to impact on surrounding heritage assets for a tall building and high density on the eastern side of Scrubs Lane and along the canal. Tall buildings are not the only way to mark important locations/junctions and to support wayfinding. In this case, Mitre Bridge would be the important and characteristic landmark and to help wayfinding.
- 16 Generally, support approach to tall buildings, but suggest additional sites not currently identified, including 19 Abbey Road, which would be suitable for tall buildings.
- 17 The Local Plan needs to consider historic context in the location of tall buildings.
- 18 Tall buildings will create a separation between Old Oak and surrounding areas.
- 19 Tall buildings definition and locations. Methodology for defining tall buildings and locations where tall buildings are "an appropriate form of development in principle" is questioned. General tall building heights should be identified. Particular concern regarding location of tall buildings along Scrubs Lane and impact

on heritage assets. The Local plan lacks clear information for building heights.

- 20 A buffer zone should be provided around low rise areas and existing open space, particularly at Old Oak Common Station. Station entrances should be moved to the centre of Old Oak and tall buildings focused in Old Oak North to minimise impact on surrounding communities. Tall buildings should be located in Old Oak North to decrease impact on existing communities
- 21 Elizabeth Line should be removed from the area where tall buildings are an appropriate form of development as it will be delivered outside of the plan period.
- 22 Figure 3.15 should mark all specific locations where tall buildings would be acceptable, including Oaklands.
- 23 Figure 3.15 shows locations previously identified as sensitive locations as being locations appropriate for tall buildings in principle.
- 24 Policy P7 should state TfL owned land surrounding North Acton Station is suitable for high quality residential led development including tall buildings.
- 25 TITRA Object to tall buildings in North Acton and Acton Wells
- 26 Removal of tall building policies that repeat the London Plan causes concern. Guidance for tall buildings in the Willesden Junction area should be provided in the Old Oak North and Scrubs Lane SPD.
- 27 It is not clear how the definition of a tall building is justified in relation to the evolving context. Existing context of RBKC is not 15 storeys. The locations where tall buildings will be an appropriate form of development in principle will impact the setting of a number of RBKC heritage sites. Figure 3.145 should be amended as follows:- "Areas where tall buildings might be an appropriate form of development". - Delete "Specific locations where tall buildings where tall buildings are an appropriate form of development in principle"
- 28 Tall building locations should be located away from sensitive locations.

The Corporation's response

OPDC considers that Policy P2 provides sufficient guidance for the location of tall buildings in Old Oak North based on evidence base.

To respond to public transport access and support legibility where major routes cross the canal, tall buildings are considered to be appropriate.

Proposals for tall buildings at these locations will be considered on a case by case basis and will be determined using all other relevant planning policy and material considerations.

North Acton has already been established as a place for tall buildings and this approach will continue to be supported reflecting existing and future improved public transport access. Tall buildings will need to take into account the surrounding sensitive locations and accord with national, London Plan policies, Local Plan policies and other material considerations.

The locations where tall buildings will be an appropriate form in principle have been identified through the methodology set out in OPDC's Tall Buildings Statement developed to accord with Draft New London Plan policy D8. The location of existing residential neighbourhoods and public transport accessibility levels have been used to inform the locations where tall buildings will be an appropriate form in principle. Given the proximity of the existing residential areas, for the purposes of the Local Plan, Midland Gate has not been identified. The Statement recognises that these locations may change and will inform future updates to the Local Plan. However, all relevant policies and material considerations will be used to inform any planning application discussions, including viability considerations.

Principle 4.7 of the Victoria Road and Old Oak Lane Development Framework Principles document identifies that tall buildings may be appropriate around Old Oak Common Lane Station subject to other relevant planning policies. OPDC considers this is an appropriate approach to the role and function of the Principles Document.

The approach to tall buildings along Scrubs Lane is supported by the Scrubs Lane Development Framework Principles which seeks to locate tall buildings in four clusters along the street reflecting movement routes, public transport access and sensitive locations. This approach accords with London Plan policy 7.7(A) and Draft New London Plan policy D8 in defining locations of tall buildings by ensuring the guidance for tall buildings is part of a plan-led approach to developing Scrubs Lane by identifying appropriate, sensitive and inappropriate locations for tall buildings. OPDC considers that building heights are one of the potential ways to support legibility appropriate to the role and scale of Old Oak. Currently permitted schemes accord with the guidance set out in P10.

A Strategic Views Assessment on the impact on relevant heritage assets was carried out to inform the Scrubs Lane Development Framework Principles. The assessment considered the impact on locations outside of the OPDC area including Kensal Green Cemetery. Tall buildings will need to take into account the surrounding sensitive locations and accord with national, London Plan policies, Local Plan policies and other material considerations.

To provide clarity for the need for visual permeability, text from the first Regulation 19 Revised Draft Local Plan will be reinstated. This will complement Local Plan Policy D4 and Draft New London Plan policy D8.

Permissions have been determined following a plan led approach considering relevant national guidance, London Plan policies, Local Plan policies and other material considerations on a case by case basis. No change proposed. The Scrubs Lane Development Framework Principles document supersedes the Scrubs Lane Direction of Travel document. This is a supporting study to the Local Plan and was subject to the first and second Regulation 19 consultations.

In relation to the appropriateness of four tall buildings along Scrubs Lane, the principle for their appropriateness has been determined through the Scrubs Lane Development Framework Principles document which was supported by a Strategic Views Assessment considering impacts on surrounding heritage assets.

Figure 3.15 identifies all areas and specific locations where tall buildings would be an appropriate form of development in principle based on the methodology set out in the Tall Buildings Statement. Oaklands is located within an area where tall buildings would be an appropriate form of development in principle.

Figure 3.15 was amended from the first Regulation 19 Local Plan to remove proposed Locally Listed assets reflecting their proposed status. Should these be adopted by OPDC prior to the Independent Examination, their depiction in Figure 3.15 will be proposed as a minor modification. Subject to the Planning Inspector's decision, these assets will be shown alongside the areas and specific locations where tall buildings are an appropriate form of development in principle. These will be managed by Local Plan Policy D8 and other relevant material considerations.

Policy P7 supports mixed use high density residential development across the area. Policy SP9 identifies North Acton and Acton Wells as an appropriate location for tall buildings in principle.

Matters for discussion

- 1)** What evidence is there to show that each of the areas and locations shown on figure 3.15 are not an appropriate form of development in principle?

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Inspector

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