

LBHF Draft Local Plan

Comments by The Hammersmith Society. February 2015

The Hammersmith Society's aims and objectives include the following: to encourage high standards of architecture and town planning in Hammersmith, and to encourage the preservation, development, improvement and beautification of features of general public amenity or historic interest.

Amendments submitted below are in black type; explanations are in red. In addition to comments from The Hammersmith Society we also refer to submissions from St Quintin and Woodlands Neighbourhood Forum (Annex 1), and from the Friends of Wormwood Scrubs (Annex 2). Guidance on Tall Buildings and the role of a Design Review Panel is found in Annex 3.

Introduction

1.6, p.3: The Local Plan sets out the Council's long-term vision for the borough. Substantial further detail is required to define this long-term vision. The current document defines the journey, some of the baggage needed on the journey, but **no clear destination**. The policies provide insufficient definition to deal with the most evident stakeholder of all: the existing built environment. The legal battleground of Hammersmith development over the recent period is a result of the absence of a defined vision and no destination to the journey. Without specific guidance and controls the development of the borough is shaped by developers. Developers' principal aim is to optimise the value of the site, and indefinite policies – as so often found in this Draft Local Plan - describing a general intent, without specific limits, are liable to fail under legal challenge by developers determined to achieve this aim.

1.9, p.4: It would be helpful if there could be a clear explanation as to how the Local Plan cross-relates to the Development Management Local Plan and Planning Guidance: Supplementary Planning Document, both adopted in 2013. We also request cross-reference to other planning documents which are still relevant, such as SPDs where they exist, e.g., Housing Standards SPDs 1 – 9 which include amenity space standards, extension sizes and basements, and Design Policies SPDs 1 – 63 which include Conservation Areas, shop- fronts and trees.

3.1, p.11: Map 1 shows Deprivation. Produce further map and database to cross-reference Map 1 with open spaces, existing and potential. **Reference link between deprivation indices and open space.**

p.15: update Map 2 Conservation Areas to show Grand Union Canal CA.

3.34, p.18, Add at end: 'Local parks are intensively used for local leisure activities and are not suitable as school playing fields. New schools therefore should be sited with space for adequate outdoor sports and play. The Council will facilitate arrangements with adjacent boroughs or private schools to share existing sports' facilities.' **Self-explanatory.**

3.38, p. 18, Improving the quality and access to recreation facilities: the borough has only 14% of the national standard of 'outdoor playing space' and that 'all opportunities to increase the provision' of outdoor playing space be taken. **This supports our amendments in the Plan to supply more open space.**

3.38, p.18: Insert last sentence: 'New developments will be required to provide appropriate amenity space for recreation.' **Self-explanatory in context.**

3. 45, p.19: Replace the sentence 'The council is investigating ... and reduce noise' with 'The Council in conjunction with the GLA/TfL is investigating options for replacing the Hammersmith Flyover and other sections of the A4 with a tunnel ('Flyunder'), coupled with redesigning the local road system in order to reduce congestion and noise, improve air quality and allow pedestrian re-connections with the river.' **A fuller statement of existing draft.**

3.46, p.19, line 8. Insert after '... diseases.': 'The Council will restore the air quality monitoring station at Hammersmith Broadway, and publish daily information on air quality in the borough on its website.' **Air quality information is published by King's; making accessible on the website will raise public awareness of important health and transport issues.**

3.46, p.19, line 8: create new 3.47 starting with existing 'The other main cause of noise pollution...' to end of section. **To give more attention to Heathrow.**

4.8, p.22: delete 'are able to produce ... their local area.' Substitute with 'set planning policies through Neighbourhood Plans to determine decisions on planning applications and provide a powerful set of tools for local people to ensure that they get the right types of development for their community.'
NPPF, paras 183 and 184. Neighbourhood Plans are an effective tool for localism. We support the recommendations of the St Quintin and Woodlands Neighbourhood Forum (Annex 1).

4.8, p.22: Give more information about how ward panels are to work in practice.

4.17. p.24: After 'There will also be more street trees' delete full-stop and insert '... in the borough, increasing from X to Y by 2025 for aesthetic, biodiversity, health, flooding, control of pollution, over-heating and other social and environmental reasons.' **Spell out why more street trees are needed. Give numbers of current trees (X) and projected numbers (Y). Wherever possible in Plan, 'use S.106, CIL, Highways or other funds to extend tree cover on development sites and/or by planting pavement trees'.**

4.19, p. 24, 5th line: Insert 'and' into 'In respect of the A4 and Flyover, subject to' **A4 is longer than Flyover.**

p. 29, 2nd bullet: 25,800 new homes.

p. 29, 6.1: 37,800 homes.

p. 92: Indicative Housing Targets. 28,200 in regeneration areas.

7.8, p.94: '1031 dwellings per annum'.

Housing targets are not easy to relate. See also p. 32: 18,000 homes. How many of these will be in LBHF?

New 6.6, p.31: 'The territorial integrity of Wormwood Scrubs is likely to come under pressure from development. The council will seek to ensure its open and existing character (including its SSI), and safeguard its biodiversity.' **A protection for Wormwood Scrubs. We support the recommendations of the Friends of Wormwood Scrubs (Annex 2).**

p.32: OORA: reframe text in light of the Council's subsidiary role working through MDC. How will the four boroughs work together on planning matters? How will the boroughs 'actively engage with local residents and community groups'? **Explain.**

p.33, 1st bullet: Delete 'Tall buildings of exceptionally good design ... impact on nearby heritage assets.' **A tall buildings policy is driven by the Mayor, by commercial developers and by the previous Administration at the Council. Tall buildings result in an unsatisfactory environment for residents, destruction of views and buildings which are expensive to maintain. Council to make clear its opposition to the Farrell masterplan of 50-storey buildings.**

p. 33, 5th bullet: after 'social,' insert 'educational, cultural,'
Educational and cultural are as important as other items listed.

6.13, p.34: delete 'Tall buildings ... would afford the area.' **Conform with p.34, 1st bullet, above.**

6.14, p.34: delete 'Consideration should also be given to the impact of development' and replace by 'Development height and massing should not over-bear' **Stronger protection.**

New 6.16, p.34: 'Council to encourage and facilitate an additional West London Line overground station at Western Circus to connect to HS2 and Crossrail and to serve a potential International Town Centre.' **Advocated by WLL Group, RBKC Labour Group, and St Quintin and Woodlands Neighbourhood Forum; LBHF to work with RBKC, Imperial College and other landowners to deliver.**

p.35: Alternative Options: prefer bullet 2, 'Defer the regeneration....' **Supply necessary transport infrastructure first; assess cumulative effect (not 'marginal') of the entire development for transport and pollution effects.**

p.35: prefer Bullet 3: **see p.33, 1st bullet, comment above.**

p. 35: Question 2: See St Quintin, Annex 1, for a response to this question.

6.26, p.40: delete 'Tall buildings ... ' to end of paragraph. **Not needed to achieve high densities and intensive development.**

p.42, 4th bullet: delete ' ... taller ... ' ; delete 'are located ... the wider plan and...'. **See comment, above, for 6.26.**

6.31, p.43: Remove last sentence. **Hostage to fortune.**

Insert: 'The Council is also aware that Cargiant, owning over 20 hectares of Old Oak North, has expressed a wish to redevelop the site for mixed use; this could also be a suitable use for the site.' **Otherwise it appears the Council favours QPR.**

6.34, p.44, after '... Union Canal' add 'Wormwood Scrubs,' **As elsewhere, when considering development in OORA.**

6.35-6.40, p.45: bring up to date. **Planning approvals have already been given for much of the area.**

p.46: bring up to date, as p.45.

p.47, 8th bullet: delete 'A limited number of tall buildings... not considered to have a detrimental...' and substitute with 'Buildings should not have a detrimental...' **Tall buildings will always have an effect, be seen from a distance and negatively influence the experience of listed buildings, Conservation Areas, 'and the local area'.**

6.43, p.48, 9th line: delete 'a hotel and conference facility'. **No longer the plan. Imperial now to locate the Michael Uren bio-medical engineering centre here.**

6.43, p.48: Insert after penultimate sentence: 'The Council will refrain from either preferring Cargiant's proposal or (new) QPR football stadium to develop Old Oak Common Regeneration Area.' **Remove assumption that QPR will move from White City or that the Council has a preference.**

6.47, p.49, 21st line: delete '...the local community ... for the area.' Substitute '...the White City and Wormholt Neighbourhood Forum.' **No need for a ward panel when the Forum is active and already working.**

6.50, p.49: take account of recent decisions by the Mayor of London and TfL to proceed with the East West Cycle SuperHighway. Consider how cycle traffic may enter or exit Westway.

p.50: Alternative Options: Yes, develop an updated SPD. **Help mitigate effects of regeneration.**

p.51: bring up to date; see comments, above, for pp. 45 and 46.

p.51, 5th bullet: Insert '... and open railway arches' after 'open space...' at end. **To create free access through the railway arches.**

p. 51, White City East, end 5th bullet: Insert, 'Encourage pedestrian and cycle links beside Hammersmith & City line between TV Centre and Shepherds Bush Market.' **Good addition to permeability and connections.**

p.51, 6th bullet: Insert ‘... local park, *White City Green*, located centrally...’.
Agree 2 ha of park (even if St James only offers 1.6 ha); Identify name of Green.
(2 ha park repeated in 6.58.)

6.57, p.53, 8th line: delete ‘... be encouraged to ...’ **Strengthen policy.**

p.54, Alternative Options, 1st bullet: since planning permission is virtually complete, clarify what is meant by this or delete.

p.54, Question 7: See St Quintin, Annex 1, for a response to this question.

p.55, bottom shaded area: Loftus Rd stadium and TA Centre. Delete ‘... the council will seek residential led development...’ and replace by ‘... the Council will seek use of both sites (if and as available) for playing fields, other sports’ facilities and open space’. **Borough very short of open space, playing fields and games’ facilities for schools and others.**

6.66, p.56, 5th line: Delete ‘... include a sport/community/leisure facility that could achieve open space’ and insert ‘...ensure the open space is maintained as sport/community/playing fields to achieve ... open space.’ **The pitch is designated open space. See comments for p.55 & p.18.**

6.66, p.56, last sentence: Delete ‘The opportunity for a development to facilitate housing for local people’ and insert ‘If the TA were to relocate the opportunity to offer open space and sports’ facilities for the benefit of local people should be encouraged.’ **QPR pitch is designated open space. See comments for p.55 & p.18.**

p.57, add 3rd bullet: ‘Encourage and promote small-scale and enterprising regeneration of the market and nearby shops as the leading retail textile centre in the UK, in a similar manner to Portobello Rd (antiques), Columbia Rd (flowers/plants) and Borough Market (food).’ **If Shepherds Bush Market becomes a destination (as with the three markets, above) regeneration will have achieved its purpose.**

p.60, 7th bullet: now known as Eventim Apollo (not Hammersmith); also in 6.73 and elsewhere.

p.62, 1st bullet & p.69, 7th bullet: Reconcile both phrases, e.g., ‘Consider reconfiguring Hammersmith Gyrotory to provide an improved traffic solution

provided that this can be done without unacceptable traffic and environmental costs in neighbouring areas.’ **Any works around the Gyrary will require protection for nearby areas.**

6.76, p.62: delete ‘provide’ and substitute ‘include’. **If King St is to thrive it must also include housing for residents with disposable incomes to support the restaurants, cinema and retail offer.**

p.64, 3rd bullet: delete ‘... opening up the Grade II listed Town Hall ... public space’, replace with ‘creating a new public space in front of the Grade II listed Town Hall...’. **It would be unacceptable to ‘open up’ the frontage (as distinct from maintenance/renovatory works), or otherwise alter this listed building.**

p.64, 6th bullet: delete ‘generally’. **Strengthens policy. Otherwise invitation to tall buildings.**

p. 66: Insert in 7th bullet: ‘ ... through public realm, *tree planting....*’ **Increases amenity.**

p.66, 9th bullet: delete ‘make a positive ... skyline’ and replace by ‘ensure building height is consistent with existing height in the townscape.’ **Strengthens policy, avoids new buildings which show against the skyline.**

p.66, 10th bullet: after ‘... Square Estate...’ delete full stop, add ‘... and introduce shared ownership housing.’ **For a mixed and balanced community.**

6.92, p.67, 6th line: remove ‘potentially’. **Already agreed its removal in recent Kings Mall upgrade permission.**

6.95, p.67: 10 storeys maximum prevailing height noted.

p.69, HRA3, 2nd line: delete ‘(A4)’, replace by ‘... and sections of the A4...’. **To allow possibility of longer Flyunder.**

p. 69, Map: Flyunder area needs to be extended to cover the total potential length within the borough. **To allow possibility of longer Flyunder.**

6.96, p.70, 6th line: Amend sentence to read, ‘Removal of the flyover and putting sections of the A4 underground has the key benefit of reconnecting Hammersmith communities separated by the construction of the road, and

reconnecting Hammersmith to its riverside. It also has the benefits of creating significant environmental...’ (as existing draft). **To allow possibility of longer Flyunder.**

6.102, p.71, last sentence: change to read, ‘ If any proposals to replace the Flyover and A4 with a tunnel return the Hammersmith gyratory to two-way working, such proposals must not widen other roads in the area, demolish properties or have unacceptable traffic or environmental effects.’ **Strengthens policy.**

7.7, p.93: delete ‘... is not lost to other uses and that it... ‘. **Too prescriptive, could be good ‘other uses’, e.g., employment. What steps – tax or otherwise - is the Council taking to discourage Buy to Leave?**

p.93, Alternative Options, 1st bullet: No. **Commercial premises already being taken for housing. Communities are best mixed with employment, workshops, shops and other facilities.**

7.52, p.107: Change text to read, ‘Outside of the Opportunity Areas ... assessed site by site on the basis of general housing need.’ **To ensure students do not take housing available for residents.**

7.58, p.109: delete last sentence (insert in another section). **Otherwise confusing.**

7.81, p.122, insert end of section: ‘The Council will establish a register of empty shops and contact details of landlords and commercial agents to facilitate vacant premises being brought back into use, possibly as pop-up, incubator or sub-divided outlets. The Council will encourage shop-fronts left vacant for more than six months to be vinyl-dressed, if necessary without the landlord’s permission.’ **To encourage lively, innovative and well-dressed retail areas.**

7.85, p.123, 9th line: Insert after ‘... important retail anchor.’ ‘Parts of the W12 shopping centre suffer from low footfall and low occupancy rates. The Council will encourage destination stores, not represented at Westfield, and facilitate pop-up, temporary shops/workshops or sub-division of larger units to build social capital, and encourage young entrepreneurs and cluster specialist shops.’ **Close proximity to the hugely successful Westfield is an asset to be built on.**

p.132, last line: delete 'community asset value' replace with 'Assets of Community Value' (with caps as shown).

7.117, p.139, line 5: delete '... and can have an impact on their health and finances'. **Not a planning reason.**

p.142, 2nd para from end, change wording to 'The Council will encourage residents to add public houses to the Community Assets Register, and will keep a register of the 109 traditional pubs in the borough. **Assets of Community Value are registered by residents' groups, rather than by the Council (unless known otherwise).**

7.121, p.146, 9th line: delete 'expect', replace by 'require'. **To strengthen policy.**

7.129, p.148: Insert as last sentence, 'Ensure the draw-dock beside Riverside Studios is made available and managed for the benefit of water-sports, including local kayaking.' **The draw-dock may otherwise sink into limbo again, and its potential lost to residents.**

p.154, new 4th bullet: Insert 'Requiring 2% of S.106 and CIL monies to be set aside for new tree planting in or near the development site in question.'
In Green and Public Open Space, there is no requirement for trees. An established 2% would redress that.

7.148, p.154, 8th line: capitalise Metropolitan Open Land (as shown here) and elsewhere.

p.155, 9th line: Insert ',playing fields' after '....the provision of more public open space ...', **See comments for p.55 & p.18.**

p.157. Access to parks and open spaces: it is stated that the Council will refuse development on 'public open space and other green open space', etc.

p.161, 2nd bullet: How will the Council encourage planting in back, side and front gardens? **p. 161, Greening the borough, 2nd bullet: no further information. Reference in 7.161, p.162.**

p.165, RTC2, 7th line: delete 'should'. **To avoid entitlement.**

7.170, p.165, 3rd line: remove '...and should...' **To avoid entitlement.**

p.168, Alternative Options, 3rd bullet: Do not allow tall buildings along the riverside. **For heritage, riverscape and amenity reasons.**

p.168, RTC4, Water-based activity: Insert in text, 'Encourage commuter and leisure passenger services on the Thames with a jetty at Hammersmith, Fulham Reach and/or Thames Wharf. **Currently, there is no passenger service stop between Putney and Chiswick, and much potential for a river transport service.**

See also supporting statements at Transport and Accessibility section, p.210, bullet 8; 7.300, p.211; 7.308, p.214.

p.172, 4th line: delete 'considers', substitute with 'demonstrates'. **Stronger.**

p.172, end 1st para: Insert 'The Council will favour heritage-led regeneration, including weight given to Buildings of Merit.' **Ensure that heritage assets, if existing, remain at the heart of all new development.**

p.172, 2nd para, delete '... generally prevailing ... surrounding area...' and replace by '... prevailing height of the majority of buildings within 100 metres of the site...' **Strengthens policy.**

p.172, 2nd para, last line: delete 'generally'. **Strengthens policy.**

7.187, p.173, 2nd line: delete '... where this is appropriate...'. **All development, of whatever size, needs to respond to human scale.**

7.188, p.173: Delete 1st sentence. Delete, 'The general character...'. Amend to 'Whilst there may possibly be scope for tall buildings in the regeneration of the borough in accordance with policies of the Local Plan the general character...' **Qualifies scope for tall buildings, gives protection to character of area.**

7.191, p.173: Delete '... and further tall buildings ... some parts of the centre.' **Strengthens.**

Insert after '...the town centre, *of 10 storeys maximum*, will need to respect [remove comma] public parks...' **See 6.95, p.67: 10 storeys maximum prevailing height.**

7.194, p.173, 3rd line: delete '... should generally be resisted...' substitute with '... would not be acceptable...'. **Strengthens.**

p.174: Alternative Options - Policy DC1

1st option: Wider design context is as important as the individual design attributes and materials used.

2nd option: Market determination refers to profitability of individual sites and takes no account of a cohesive integrated urban plan.

Both proposals are unacceptable.

p.174, DC2, add to (g): 'encourage performance standards such as Passivhaus'. (7.252, p. 192: new last six lines set out Passivhaus standards.)

p. 176, Alternative Options - Policy DC2

1st option: Objection. High quality cannot be provided without consideration of design.

2nd option: Agreed. Design and Access statements are essential.

p.177, Alternative Options - Policy DC2

1st option: a comprehensive local plan should provide the design criteria and specific development guidance to respond to development pressure for tall buildings. **Strengthens general presumption against tall buildings in draft Local Plan.**

2nd option: unclear as to meaning.

7.215, p.179: Insert at end, 'Cars parked in front gardens remove street parking and total available parking space. If hard-standing is unavoidable it is to be SUDs permeable and accompanied by as much soft planting as possible.' **SUDs, amenity and environmental reasons.**

p. 179: Alternative Options – Policy DC4

1st option: prohibition of extensions is unrealistic but all extensions – up, down and sideways – must accord strictly to the Local Plan and other policies.

2nd option: removal of constraints has already been rejected by Parliament in the recent permitted development legislation changes.

p.180. Shopfronts. After 3rd para (shaded area), insert new para: 'Advertising, signage and fascias should not be over-large, and should be in style with the type of shop and the surrounding area.' **Streetscape and amenity reasons.**

7.239, p.187: After '... sensitive solutions ...' insert 'especially when heritage assets will be affected.' Delete 'though', insert cap 'There...'. **Strengthens protection for heritage buildings.**

7.240, p.187, 9th line: Insert ' Buildings of Merit may be approved for demolition only in exceptional circumstances.' **Protection of BoM.**

p.208, Light Pollution

Amend Policy CC11 to read '... include proposals for internal or external lighting, including illuminated signs....' **Incorporate advertisement signs within buildings, e.g., Beavor Lane/A4.**

p.208, after 2nd bullet insert new bullet:

'Has adequate controls to switch off lights above ground level when building not in use;' **Money saving, lessening light pollution and disturbance.**

p. 208, 5th bullet: 'Ensure LED street lighting is no brighter than conventional street lighting.' **LED lighting is typically brighter. See also p.208 (above).**

p.210. Transport and Accessibility

p. 210 onwards: Develop a borough policy for treatment of pavement tree surrounds (see Streetsmart) which is practical and aesthetically pleasing as well as meeting safety considerations. **Not included in Transport and Accessibility section. Cannot find elsewhere? Avoid different styles surrounding street trees giving an unpleasing appearance. (See K&C for good practice.)**

p. 210: Paving: 'Use buff-coloured tactile paving for aesthetic reasons and to reduce distractions.' **This is not included in Transport and Accessibility section. Cannot find elsewhere? Other boroughs avoid bubble-gum pink.**

p. 210: Zebra crossings and other crossings: 'Consult and take account of residents' and groups' views for siting.' **Crossings on suitable desire lines to promote pedestrian safety on busy roads. Note: The ongoing Shepherds Bush street upgrade did not include more zebra crossings on Goldhawk Rd (despite public consultation).**

7.300, p.211: Separate policy sections for the Thames and for the Grand Union Canal. **In the light of new opportunities at Old Oak Regeneration Area, HS2, etc.**

p. 239, Conservation Area: Amend definition: 'An area of special architectural or historic interest, designated by the Council under the Planning (Listed

Buildings and Conservation Areas) Act 1990, the character of which it is desirable to preserve and enhance.'

p.244, Listed Building: Amend definition: 'A building or structure of special architectural or historic interest that is statutorily protected under the Planning (Listed Buildings and Conservation Areas) Act 1990. Listed buildings are graded I, II* or II with grade I being the highest. Listing can include the interior as well as the exterior of the building, and any buildings or permanent structures within its curtilage.'

p.244, Local Building of Merit: Amend definition: 'Locally important building valued for its architectural interest, historical significance or contribution to the townscape, but not meriting Listed Building status. BoM status is a material consideration in respect of a planning application.'

p.245, Metropolitan Open Land (MOL): Amend definition: 'Strategic open land within an urban area protected by statute (similar to Green Belt protection).'
Include (MOL) in brackets after name.

p.248, Tall Buildings: Amend definition: 'A building of at least 27 metres in height – equivalent to 9 residential storeys – substantially taller than its neighbours and/or which significantly changes the skyline.'
NPPF/English Heritage/ London Plan/CABE definition, fuller than in Draft.

Annex 1

RESPONSE TO CONSULTATION ON THE LBHF DRAFT LOCAL PLAN FROM THE ST QUINTIN AND WOODLANDS NEIGHBOURHOOD FORUM

Background

The St Quintin and Woodlands Neighbourhood Forum is a body designated by RB Kensington and Chelsea to prepare a neighbourhood plan for an area in North Kensington.

This area adjoins the borough boundary, and the Forum is therefore actively engaged in planning issues affecting the White City Opportunity Area, and that covered by the new old Oak and Park Royal Development Corporation. We are commenting only on those aspects of the Draft Local Plan which affect the north of the Borough.

The Forum has a membership of 360 residents and businesses

Introductory sections of the Draft Local Plan

Paragraph 4.8 states '*Local communities that are designated Neighbourhood Forums are able to produce neighbourhood plans that will allow residents to have more say about planning policies and development in their local area*'. This appears to be all that is said in the document about neighbourhood planning, and does not do justice to this part in the national planning system, now being implemented in over 1,200 areas across England.

The Draft Local Plan does not acknowledge that neighbourhood forums can do more than 'allow residents to have more say'. Such forums can '*set planning policies through neighbourhood plans to determine decisions on planning applications*' (NPPF para 183) and '*provide a powerful set of tools for local people to ensure that they get the right types of development for their community*' (NPPF Para 184).

The current draft document does not make clear which LBHF policies are deemed to be 'strategic' and which are 'non-strategic', in relation to the 'general conformity' requirements for those bodies preparing neighbourhood plans. Paragraph 077 of CLG Planning Practice Guidance reminds LPAs that '*A local planning authority should set out clearly its strategic policies in accordance with [paragraph 184 of the National Planning Policy Framework](#) and provide details of these to a qualifying body and to the independent examiner*'. Is it to be assumed that all those statements labelled as 'Strategic Policies', 'Strategic Site Policies' and 'Borough-wide policies' in the document (in the three respective sets of coloured boxes) are all 'strategic'? Or only some of these?.

Many local authority Local Plans currently date from pre 2012 and fail to make this distinction clear. But when preparing a new Local Plan for 2015 onwards, the requirements of the NPPF in this respect should surely be observed?

During the life of the Borough's new Local Plan, there may well be a number of neighbourhood forums in the borough coming forward with neighbourhood plans. It is therefore important that the document gives up to date information on the potential significance of such plans, and on the Council's role in supporting the neighbourhood planning process.

Question 1 - Regeneration Areas

What are your views on the approach to regeneration areas?

The approach of designating five 'Regeneration Areas' may risk confusion for the public. The Old Oak Regeneration Area corresponds to part of the Old Oak and Park Royal Development Corporation Area, and will be subject to a separate planning regime following

formal establishment of the Corporation. The White City Regeneration Area is the same as the White City Opportunity Area, a term which has been used by the Council and GLA for over a decade. Is there any value in redefining the same part of the borough with a different title?

Or does this change of name imply that LBHF has withdrawn from joint working with the Mayor of London on the White City OA, and that the 2013 WCOAPF document will cease to have any relevance after the adoption of the new LBHF Local Plan? If so, this would be welcomed by the StQW Forum, but needs to be explained.

Question 2 - Old Oak Regeneration Area

What are your views on the approach to the Old Oak Regeneration Area?

This section of the Draft Local Plan will clearly need to be updated to reflect the decisions of the Secretary of State, and Mayor and London Assembly, on the establishment of the OPDC. The public need a clear explanation of which planning decisions will in future be made by the Mayor and which (if any) by LBHF as the local planning authority.

'Visions' for Old Oak published to date, coupled with the pace at which the MDC has been imposed on the area and the promise of early 'masterplans' from developers, do not inspire public confidence that infrastructure challenges on the road network and on sewerage/drainage are being thought through.

Most critically, the limited prospect of Government funds and public investment at Old Oak suggests that a 30 year redevelopment of this part of London will be excessively reliant on private investment geared to short term reward. Despite the hype around a '*state of the art intermodal interchange*' the prospect of a very expensive railway station and mini-city of tower blocks attached, with development costs reliant largely on private funding, sets alarm bells ringing amongst neighbouring communities.

The fact that a familiar band of property consultants and 'masterplanners' has already been engaged by competing landowners has heightened public concerns. There are the usual signs that these commercial intermediaries in the planning process, with their own interests to serve, will exert excessive influence on what happens next at Old Oak.

Residents in the Old Oak area have been invited to comment on competing propositions from QPR Football Club and Car Giant. These public exhibitions have shown CGI images or artists impressions of a future development, but have provided very little of substance in terms of solutions to infrastructure challenges, particularly in terms of the road network.

The current document's 'Strategic Policy OORA' on page 32 will clearly need to be re-framed to better reflect the role that LBHF play as a subsidiary body working through the MDC. It should be realistic about the level of influence the Council will exert. It should explain arrangements for joint working between boroughs, on planning issues relating to Old Oak.

The text could usefully expand on how the Council intends to '*actively engage with local residents and community groups to ensure that regeneration delivers benefits for the surrounding area*'. This engagement with the OPDC needs to be organised on a cross-borough basis, with Brent, Ealing and RBKC.

The quoted target figures for homes and jobs in the LBHF part of the OPDC area, as compared with the totals the Mayor is promising for the whole OPDC, need to be made clear (the various different figures in the current draft are not easy to relate).

Tall buildings

Strategic Policy OORA currently states *Tall buildings of exceptionally good design may be acceptable, as part of increased massing nearer to areas of high public transport accessibility and subject to detailed analysis of their impact on nearby heritage assets.*

This is familiar language that echoes the misguided planning policies of the previous LBHF administration. Why is high public transport accessibility seen as a justification for tall buildings? The only link is the somewhat spurious argument that tall buildings achieve high density, and that high densities should be achieved at locations with high PTAL levels.

RBKC is a borough with high densities (through the use of mansion blocks, high density low rise, and careful planning), But the Royal Borough also has few very tall buildings, and robust policies to prevent the arrival of more.

The reality of the current Mayor's 'vision' for a cluster of very tall buildings at Old Oak appears to have more to do with the enthusiasm of commercial developers for such structures - a phenomenon seen across London in the last two decades. This in turn is based on the appeal of construction methods which offer short-term financial benefits to developers. Building tall has become cheap. But there is a long-term price to be paid in terms of an unsatisfactory environment for residents (especially families), the destruction of views for the wide public, and buildings which end up with very expensive refurbishment costs and/or a short lifespan.

London (and Hammersmith & Fulham) have been here before on tall buildings, in the 1960s. Few lessons seem to have been learned.

Consultants Farrell Partnership have been engaged by QPR to prepare an initial masterplan for Old Oak. At the 2014 public exhibition mounted by QPR, Farrells were already talking of buildings of 50 storeys, at locations closest to the HS2/Crossrail station with reduced (but still significant) heights towards the periphery. LBHF needs to make clear urgently its opposition to such suggestions.

Hence the StQW Forum would strongly support the 'alternative option' on page 35 **Optimise the quantum of development as far as possible but prohibit tall buildings in the regeneration area.** It is hoped that LBHF will prove able to exert influence on the OPDC in this respect.

Transport

Paragraph 6.11 comments that *'The North London Line and West London Line both run through the OORA and form part of the London Overground network. Connecting London Overground to the planned Old Oak Common station would enhance public transport accessibility in the OORA as well as relieving pressure on Euston and benefitting the existing stations along the London Overground network by providing a direct connection to HS2 and Crossrail and the Great Western Main Line.*

Paragraph 6.7 states *'Connectivity within the OORA is poor, with no east-west vehicular connections and limited pedestrian permeability. There are no stations on the railways that cross the area, apart from Willesden Junction, on the northern edge'*. No recognition is given to, and no consultation question asked on, the potential benefits of an additional WLL Overground station at 'Western Circus', as advocated by the West London Line Group, the RBKC Labour Group, and the St Quintin and Woodlands Neighbourhood Forum. This issue is covered further in our comments below, on White City East.

Paragraph 6.18 rehearses the infrastructure and transport challenges that will arise from *'an additional 18,000 homes and 50,000 new jobs'* at Old Oak. As in the June 2013 Vision for Old Oak, there are few proposals in the current Local Plan which give the public any confidence that these challenges are being planned for in any effective way.

On the road network paragraph 3.45 acknowledges that *congestion on north-south routes, particularly the Fulham Palace Road– Shepherds Bush –Wood Lane–Scrubs Lane corridor is a major issue.* And 3.46 states that *Road traffic is one of the main causes of carbon dioxide (CO2) emissions, poor air quality(19) and noise pollution in the borough. Nearly one sixth of CO2 emissions in H&F in 2011 was from road transport(20) and traffic related emissions contribute to exceedence (sic) of air quality targets in the borough.*

As more information emerges on the health consequences of long-term exposure to traffic emissions, residents in the areas close to Westway and the A40 (one of London's severe pollution hotspots) will be increasingly resistant to over-ambitious plans for the development of Old Oak.

The current draft offers the Alternative Option of **Defer the regeneration of parts of the site until suitable transport nodes are operational. This Forum supports this Option.**

Commercial developers will give low priority to resolving the transport and traffic problems that intensive development at old Oak will create. As with developments in White City East, consultants will be steered towards providing evidence that the consequence of each individual development will be 'marginal' in terms of extra traffic congestion. There are real risks that the OPDC, developers, and HS2 will downplay the real impact, for differing reasons. It will be local residents who then have to live with the results.

Weighting land use more towards employment and less towards residential (as offered under Alternative Options for OORA at 6.19) would be likely to create less demand on the road network.

Paragraph 6.15 states *Within the OORA itself, development will provide opportunities to overcome the existing severance by creating a new coherent and legible street network that bridges over barriers such as the West Coast Main Line, Great Western Main Line and the Grand Union Canal.* Local residents need to know how such 'bridges' would work and roughly where they would be located. The existing physical barriers in the area date back for 150 years, and all forms of change will have major consequences.

Comments such as *'Substantial improvements will need to be made to the highways network within and near to the OORA'* leave the public none the wiser. On the eastern side of the Old Oak area, it is very hard to see what 'substantial improvements' can be made to Scrubs Lane/Wood Lane, short of an elevated motorway (as was proposed in the 1960s).

Other infrastructure

On sewers and drainage, the Counters Creek system is already struggling to cope and the subject of a programme of mitigation measures to reduce the risk of surface water flooding. There seems to be no guarantee that OFWAT will approve the necessary capital funding for TWA to undertake a fundamental rebuild.

Strategic Site Policy OORA3 - Old Oak North

This states *'Ensure that taller buildings are located at points of townscape significance within the wider plan'*. What does this mean, when currently there is no 'townscape' significant or otherwise. As above, we would support a policy resisting tall buildings in this location. Such buildings are not needed to achieve relatively intensive development and high densities.

Strategic Site Policy OORA1 – Old Oak Common Station

This policy states *'Most access will be by buses, taxis, walking and cycling but provision will need to be made for a small proportion of journeys to be made by private car'*.

Paragraph 6.24 expands on this, stating *'Of the 50,000 passengers anticipated to exit and enter the Old Oak Common station from the surrounding area each day, it is estimated that about 10% will use cars or taxis.'*

Is there evidence from other London mainline stations that this 10% figure is remotely realistic, given that many passenger on HS2 and Crossrail will be carrying heavy luggage?

The paragraph continues *The existing road network around the OORA would be unable to cope with the additional trips generated by this. It is therefore imperative that road improvements are made and that the potential for new road connections is investigated. To connect to the A40, road widening and junction improvements will be needed along Old Oak Common Lane and at Gypsy Corner. The possibility of relocating the A40 northwards to the Great Western Railway corridor should be investigated.*

This last sentence is the first indication that the StQW Forum has seen of the need for more radical solutions to the road network around Old Oak? Is the Local Plan saying that LBHF

will undertake such investigations, or TfL, or the OPDC? It would help to have clarity on responsibilities.

White City Regeneration Area

It is not clear why paragraphs 6.35-6.40 do not explain that planning approvals have already been granted for the Imperial West (Woodlands site), the originally proposed Brickfields Urban Village, Westfield 2 and the Stanhope/BBC site. The proposals from St James for the former M&S site are close to decision. The statement at 6.40 that *'the opportunity exists in the WCRA for substantial mixed-use development'* is misleading as most of decisions on such development are already made and the opportunity for anything very different has passed.

It would help to cross-reference the references to a target of 6,000 new homes in the White City Regeneration Area with the table at Section 7 of the Draft Plan, thereby making clear that this target is realistic and takes account of known schemes

Strategic Policy WCRA - White City Regeneration Area

The above comment applies to this policy statement, which starts *'The Council will work to secure the comprehensive regeneration of WCRA, in particular the creation of a new high quality mixed-use development in White City East'*. As a Local Plan for the future, the document should start from the present position rather than reiterating content from the existing Core Strategy. Planning permissions are already granted for such mixed use development (regrettably, given that these permissions will lead to overdevelopment of the sites, excessive strain on the road network and other infrastructure, and a wholly new cluster of very tall buildings).

Strategic Site Policy WCRA1 - White City East

The Draft Plan states *'Ensure that new development respects the scale of adjoining development along its edges, but with increased massing towards the centre of the site. The scale should be generally medium rise and aim to meet the regeneration objectives of the area. A limited number of tall buildings of exceptionally good design may be acceptable especially in locations close to the A40 and A3220 where they are not considered to have a detrimental impact on the setting of listed buildings, the character and appearance of the Wood Lane conservation area, or the setting of other neighbouring conservation areas and the local area in general'*.

This is little different from the current 2011 LBHF Core Strategy policy for White City East, which states *'The council will expect most new development to be low to medium rise, however a limited number of tall buildings of exceptionally good design may be acceptable, in particular, close to the A40 and A3220 and in any other areas identified in the White City OA planning framework tall buildings strategy.'*

As in the 2011 Core Strategy, there is little or no reasoned justification for the argument that it is 'acceptable' to locate very tall buildings close to the A40 and A3220. The arguments used by the Council in the past, of the 'Gateway to London' were wholly unconvincing to local residents. The claim (as in 6.52) that these locations are appropriate for very tall buildings *'due to large pieces of road and rail infrastructure that act to separate*

potential taller elements from nearby lower-rise residential areas' carries little conviction. The degree of 'separation' created by a railway line or even the Westway is small, when considering very tall buildings. Why is a building of above 30 storeys any less of an intrusion, in terms of views, skylines and overshadowing, just because it sits next to a railway line or even an elevated motorway?

Paragraph 6.52 is a modest improvement on the 2011 Core Strategy in that the wording recognises that tall buildings in White City East may have a detrimental impact '*on the setting of other neighbouring conservation areas and the local area in general*' as well as on the Wood Lane CA. The refusal of the previous LBHF administration to take into account the views of Kensington & Chelsea Council and of residents of the Oxford Gardens CA, when approving the tall buildings of the Imperial West site at Woodlands, has left this neighbourhood (and that of Eynham Road in W12) potentially blighted for all time.

Paragraph 6.43 refers to plans for a hotel and conference facility on the Woodlands site. This is incorrect given that Imperial College has dropped these proposals, in favour of locating its proposed bio-medical engineering centre on this part of the site.

Paragraph 6.45 refers the references in the Further Alterations of the London Plan for White City East *having the potential to become an International Town Centre*. Many local people may welcome this, along with the presence of Imperial as a university of global excellence, **but only if the problems of an over-congested road network and gaps in access to public transport are resolved first.**

The case for an additional Overground station on this stretch of the West London Line if ideas of an international centre, well connected to HS2 and Crossrail, should be pursued seriously and actively by LBHF, working alongside RBKC, Imperial College and other landowners. An '*international town centre*' sitting alongside regular gridlock on Wood Lane will have little appeal to investors and international academic partners of Imperial. Such a scenario will only reinforce London's reputation as a global city which is slow to get its act together when it comes to addressing major public transport issues.

Alternative Options - Strategic Policy WCRA (White City Regeneration Area)

There may be a case for developing an updated SPD for the area, to replace the WCOAPF adopted in 2013, if the Council feels there is scope for mitigating some of the adverse consequences that will arise from the planning decisions taken by the previous administration.

An alternative would be for LBHF to get behind the proposal for a White City and Wormholt Neighbourhood Plan, and for this to become the primary vehicle that sets planning policies for White City East in respect of those planning issues not yet decided (e.g. details of public realm, open space, pedestrian and cycle routes, site allocations for educational, social and community facilities and disposition of CIL).

In the meantime the StQW Neighbourhood Forum and St Helens Residents Association will continue to argue strongly that the masterplan for Imperial's Woodlands site should be looked at afresh, given the College's proposals to drop the hotel and replace it with the

Michael Uren bio-medical engineering centre. This proposed alternative building is for an entirely different use, occupies a larger footprint on the site, disrupts the originally proposed north/south pedestrian route, and is significantly taller (16m). Decisions on an application should **not** be treated (in our view) as a S73 minor material variation to the current approval.

Strategic Site Policy WCRA1 - White City East

The requirement in the draft policy to provide large amounts of housing for residents across all tenures, house sizes and affordability' seems a little vague. How large is 'large' and how will the Council ensure a sufficient level of affordable housing? The Imperial West proposed tower at Woodlands us due to provide 'key worker' housing, at a level of one third of its total units, but no affordable housing per se. The affordable elements of Westfield 2 are known, and negotiations are presumably in progress for the St James application (yet to be determined).

In other respects, such as open space provision and protection of heritage buildings on the former BBC site, most of this proposed policy WCRA1 appears to be post-hoc policy-making, following on from rather than leading development.

For example paragraph 6.55 states in respect of the two Imperial sites '*Student accommodation will be considered on these sites but it should not compromise the overall housing capacity of the area nor should it create large areas of predominantly student housing.*' 608 graduate flats have already been built and occupied on the northern of the two sites. What level of additional student housing would the Plan consider acceptable, and is this not already a '*large area of predominantly student housing?*'

Paragraph 6.47 states *Any public sector services delivered in the White City Regeneration Area should be discussed with the local community which will likely be in the form of a Ward Panel for the area.* Is there evidence that a Ward Panel is what the local community wants, given the work that has already gone into the White City and Wormholt Neighbourhood Forum?

Paragraph 6.50 needs to take account of recent decisions by the Mayor of London and TfL to proceed with the East West Cycle SuperHighway. Consideration needs to be given to how cycle traffic wishing to enter or exit the Westway section of the Highway at Wood lane could be handled. The StQW Draft Plan (see at www.stqw.org) suggests cycle lifts between the Westway roundabout and the currently undeveloped Westway Trust site at 301 Wood Lane (owned by TfL). These would relieve what otherwise look to be problematic cycle/vehicle conflicts at the foot of the Westway 'on' ramp at Wood Lane.

Alternative Options - Strategic Site Policy WCRA1 (White City East)

The alternative option offered is '*Separate planning development of individual sites east of Wood Lane*'. What is this intended to mean? Separate planning development as opposed to a masterplan as set out in the 2013 WCOAPF? Given that proposals for most of these sites are either approved or at very advanced stage, the realism of this 'alternative option' is unclear.

Question 7 What are your views on the approach to White City East?

As set out above, our views are that the Council and the Local Plan should:

- seek to mitigate, in terms those approved schemes which will lead to over-development of sites and excessive building heights (the results of the 2011 LBHF Core Strategy and 2013 WCOAPF).
- reconsider Imperial's masterplan and outline approval for the Woodlands site in the context of the application for the Michael Uren building.
- support the preparation of a White City and Wormholt Neighbourhood Plan as an alternative to a new SPD for White City East, thereby ensuring greater community involvement.
- ensure the cumulative impacts of proposed developments on the road network are thoroughly assessed and that radical options are considered given the likely additional demand from the proposed development of Old Oak
- make the case to TfL, with RBKC and Imperial College and other landowners, for an additional Overground station at 'Western Circus'

Borough-wide policies - Housing

Paragraph 7.7. refers to the problem of 'Buy to Leave'. It would help if the Plan explained what steps the Council is taking to monitor this trend and whether it will be introducing policies to prevent this aspect of the London housing market.

It is not clear whether the 'alternative option' of *Introduce a time limit for the protection of vacant sites* refers to sites left vacant by developers, or completed residences left vacant by their owners?

Alternative Options - Policy HO3 (Affordable Housing)

The Forum would support differential affordable housing targets in different parts of the borough. Over-ambitious targets that are never likely to be achieved, on the basis of the LBHF experience to date in handling Financial Viability Assessments, should not be used in the Local Plan as these suggest to the public that the Council is capable of achieving outcomes which it cannot in reality deliver.

StQW Neighbourhood Forum
19 February 2015

Annex 2

Friends of Wormwood Scrubs submission

London Borough of Hammersmith and Fulham ("the Council") Draft Local Plan ("DLP").

Representations of the Friends of the Scrubs ("the Friends").

Introduction

1. The full name of the Friends is the “Friends of Wormwood Scrubs Park Association (“The Friends”). The Friends are well known to the Council and in particular the Wormwood Scrubs Charitable Trust Committee which is responsible for the management of the Trust. None the less we feel it is necessary to summarise who we are and why we make these representations.

2. The Friends are an association of users of Wormwood Scrubs Park (“the Scrubs”), are recognised as a charity by HMRC and have over 3,000 supporters. The objects of the Friends according to our constitution include the protection and conservation of the Scrubs for the exercise, recreation and enjoyment of the public in accordance with the Wormwood Scrubs Act 1879 (“the 1879 Act”) and the resistance of encroachments and other inappropriate activity affecting the lawful use and enjoyment of the Scrubs by the public.

3. The Scrubs is probably unique among the open spaces of Greater London. As well as supporting sports pitches, the Linford Christie Stadium, the Wormwood Scrubs Pony Centre and children’s play areas, the variety of its habitat has led to the designation of parts of it as a Local Nature Reserve. The diversity of activities it affords is reflected in its many users, to whom a major aspect of its appeal is its sense of rural apartness and space with a lack of formal paths and flowerbeds. As well as being protected by the 1879 Act the Scrubs is a designated MOL, is a registered common and protected by other open space legislation.

4. In response to ‘Old Oak a Vision for the Future’ (June 2013), the Friends mounted a “Save our Scrubs” campaign with the following aims:

- To ensure that all development around the Scrubs fully respects the present character of the Scrubs as a common land for the enjoyment and recreation of all Londoners, a diverse habitat, a managed wilderness and a series of local nature reserves
- To demand that Old Oak developments are not dictated by the interests of developers but are sensitive to the needs and desires of all those with a stake in the Scrubs including its diverse wildlife

An online petition in support of these aims attracted 3,131 signatures.

The summary of consultation responses to the Vision published by the GLA in April 2014 included:

“Wormwood Scrubs

6.3 The main issue raised in the consultation responses related to the effect of the regeneration proposals on Wormwood Scrubs **(254 responses)**.

- Concern that no development should encroach onto Wormwood Scrubs **(224 responses)**.
- Concern regarding the negative impact of the proposals on the natural environment and wildlife **(188 responses)**.
- Concern to protect the character of the Scrubs as a wilderness area **(153 responses)**.
- Concern regarding the negative impact on the view from the scrubs looking north towards the proposed development **(124 responses)**.
- Concern regarding the negative impact from proposed new pedestrian routes through the Scrubs **(53 responses)**.
- Concern regarding the negative environmental impact on the Scrubs from noise, dust, light impact of the regeneration **(52 responses)**."

Representations

Question 1 – Regeneration Areas

What are your views on the approach to regeneration areas?

5. The Friends strongly support the Council's approach to regeneration areas. In the representations that follow we confine ourselves to those aspects of the DLP that directly affect the Scrubs.

Question 2 – Old Oak Regeneration Area

What are your views on the approach to the Old Oak Regeneration Area?

6. We note that "Proposals for development in the OORA should (Strategic Policy sixth bullet point) create a network of new public green open spaces." We fully support this proposal, which echoes the Mayor's FALP where it suggests that the potential for a network of *new* (our italics) open spaces and green links within the OORA should be investigated. The DLP develops this in paragraph 6.16, saying "The Council will expect development to contribute to a new network of public green open spaces" and referring to a 'green cross' centred on Old Oak Common Station and connecting North Acton with the Grand Union Canal, Kensal, Willesden Junction and Wormwood Scrubs. Please see also our representations concerning access to the Scrubs (paragraph 9) below. It is important for this Policy to be considered in conjunction with Borough Wide Policy OS1 Protecting parks and open spaces (Question 46, paragraph 13 below). We further support seventh bullet point that proposals should "ensure that Wormwood Scrubs is protected and its existing character and biodiversity value is safeguarded".

7. DLP 6.11 “Any connection to the London Overground network should have minimal impact on surrounding heritage assets and open spaces such as Wormwood Scrubs which is designated as Metropolitan Open Land” is fully supported by the Friends who have (with the Council and the Charitable Trust) in their representations to TFL consistently argued for an Overground link that does not impinge on the Scrubs.

8. DLP 6.13 refers to the need for proposals for tall buildings to be assessed to ensure that they do not detrimentally impact on residential amenity and nearby open spaces and heritage assets such as Wormwood Scrubs, the Grand Union Canal, St Mary’s Cemetery and Kensal Cemetary. We support such an assessment.

Question 3 – Old Oak Common Station

What are your views on the approach to Old Oak Common Station?

9. We acknowledge the aim stated at 6.21 for the station to contribute to the pedestrian and cycle friendly network of open and civic spaces running from North Acton to Kensal and Willesden Junction to the Scrubs. We have however serious concerns about the following

“Access to the south would have to be opened up after the North Pole Depot is released for development, which is planned to be used as an Intercity Express Programme (IEP) Depot. The development of temporary solutions for accessing the open space at Wormwood Scrubs in advance of this will be encouraged. Once the IEP depot is relocated there will be opportunities to explore innovative solutions for the ways in which the station interfaces with Wormwood Scrubs. An entrance to this location would open up opportunities for people to walk to and from East Acton Central Line station, further enhancing connectivity and accessibility in the area. Any proposals for an access into Wormwood Scrubs would need to be sensitive to the character and natural environment of the Scrubs. In particular, consideration should be given to the impact of any access on biodiversity.”

(i) While some access to the Scrubs from the north could be in keeping with its use under the 1879 Act “by the inhabitants of the metropolis for exercise and recreation” we question whether the same could be said for its use as a route between the HS2/Crossrail Station and the Central Line at East Acton station. Tarmacked or similarly surfaced paths would no doubt be needed for the regular crossing of the Scrubs by foot passengers which we do not consider to be in harmony with the character of the Scrubs as described in paragraph 3 above nor with the concern regarding pedestrian routes expressed by respondents to the Old Oak Vision (paragraph 4 above). Further, we consider there would be difficulties in such a route complying with the aim of the DLP that access should be “sensitive to the character and natural environment of the Scrubs” and rely on bullet point seven under Old Oak Regeneration Area above that proposals should “ensure that Wormwood Scrubs is protected and its existing character and biodiversity value is safeguarded.”

(ii) In any event we are unclear as to the need for such a route. Crossrail will provide a connection with Central Line at Ealing Broadway to the west and Bond Street to the east. There will be an Overground link from Old Oak Station on the West London Line to Shepherds Bush (Central Line, one stop). Within the context of the massive infrastructure proposed by the FALP and the DLP for Old Oak it is somewhat quaint to place reliance on walking almost three quarters of a mile (nearly half a mile of which crosses the Scrubs) to provide “connectivity”.

Question 4 – Old Oak South

What are your views on the approach to Old Oak South

10. The Friends support the statement (North Pole Depot, second bullet point) that development proposals should be predominantly residential around the edges of the site, especially on the boundaries of Wormwood Scrubs, Little Wormwood Scrubs and the Grand Union Canal. We endorse (paragraph 6.26) “...any tall buildings would need to be located sensitively and exceptionally well designed in order to ensure that they make a positive contribution to the skyline. Tall buildings would need to be perceived as separate elements within a coherent group rather than combine to form a single mass, particularly when viewed from the Grand Union Canal to the north and Wormwood Scrubs to the south”. We would add, as we submitted on the draft FALP, that tall buildings should not be so close to the northern boundary that they would dominate the Scrubs (and see paragraphs 8 above and 12 below).

11.

(i) Fourth bullet point refers again to a network of green open spaces and fifth bullet point refers to upgrading Wormwood Scrubs and sports facilities such as the Linford Christie Stadium. DLP 6.29 mentions again the “green cross” (see previously DLP 6.16 and paragraph 6 above) and the release of the IEP depot allowing for the “completion of a connection to Wormwood Scrubs. A civic or open space should also be provided here, whilst improvements to Wormwood Scrubs and Linford Christie Stadium would contribute to meeting the needs of the regeneration area”. In relation to a connection to the Scrubs, please see our representations in paragraph 9 above. We have not found specified in the DLP what upgrading of or improvements to the Scrubs or Stadium are intended: we would like the opportunity to comment on them.

(ii) We are concerned at the statement “improvements to Wormwood Scrubs would contribute to meeting the needs of the regeneration area”. DLP 6.16 (“new network of public green open spaces” paragraph 6 above), 6.29 (“green cross”), 7.150 (“opportunities for new open space” paragraph 13 below) refer to the provision of new public green/open space within the OORA. This is of particular importance in relation to the Scrubs because of the proposal in the FALP (Old Oak Common Opportunity Area 27) that the Scrubs would provide a major amenity to support the

residential and retail development of the area with a capacity of 24,000 homes and 55,000 jobs (see DLP 6.2). DLP 7.150 *“In the opportunity and regeneration areas especially, there are opportunities for new open space. This may be provided in a number of ways...”* in particular supports our contention that the Scrubs should not be regarded as a substitute for the creation of appropriate open/green space within the development. The concept of the *existing* amenity of the Scrubs’ open space being used to meet the needs of the *new* regeneration area should be resisted, not encouraged by the Council. “Improvements” have the potential for alteration of the character of the Scrubs which is not only at variance with the wishes of its users (paragraph 4 above) but also with proposals within the DLP itself: see *Proposals for development within the OORA should (bullet point seven) “ensure that Wormwood Scrubs is protected and its existing character and biodiversity value is safeguarded”*, 6.21 *“access into Wormwood Scrubs would need to be sensitive to the character and natural environment of the Scrubs. In particular consideration should be given to the impact...on biodiversity”*.

Question 5 – Old Oak North

What are your views on the approach to Old Oak North?

12. We endorse the fourth bullet point to the effect that taller buildings should respect the amenity of and settings of the Grand Union Canal, St Mary’s and Kensal Green Cemeteries and Wormwood Scrubs.

Question 46 – Protecting parks and open Spaces

What are your views on the approach to protecting parks and open spaces?

13. We endorse second bullet point to the effect that there should be a mix of new public and open space in (among other places) the Old Oak Regeneration Area and DLP 7.150 *“In the opportunity and regeneration areas especially, there are opportunities for new open space. This may be provided in a number of ways...”* We reiterate (see paragraph 11 (ii) above) our strong reliance on DLP 7.150 in support of the case for a self-sufficiency of open space within OORA without resort to the Scrubs to compensate for inadequacy in such provision. See also paragraphs 6 above and 14 below.

Question 47 – Access to parks and open spaces

What are your views on the approach to accessing parks and open spaces

14. We note fourth bullet point *“Seeking improvements to existing open space and facilities within them, such as Linford Christie Stadium, where appropriate and when development proposals impact upon provision”*.

(i) The Friends support improvements within Linford Christie Stadium

(ii) DLP 7.154 includes *“In some cases, a contribution to secure improvements in existing open space rather than provision of new open space, will be appropriate. This is likely to involve improvements to existing open space in proximity to developments where it is not practicable to provide adequate open space on site. The improvements could include new or*

*upgraded play areas....**In particular, the council will seek improvements to Wormwood Scrubs in the light of its proximity to the Old Oak Regeneration Area.** The council will support friends' groups that are representative of the community..."*

The sentence in bold could be read as in potential conflict with DLP 6.16 ("network of green spaces" paragraph 6 above) and DLP 7.150 ("new open space" paragraph 13 above). If appropriate *new* open space is to be provided within the Old Oak Regeneration Area, as those parts of the DALP propose, the proximity of the Scrubs to the Area should have no bearing on the need (or otherwise) for its improvement. Any improvements to the Scrubs should be on their own merits: the Scrubs is not within the Regeneration Area (DLP 6.4). If proposed improvements cannot be specified they should at least be described in general terms so that the Friends (and other interested parties) can comment on them.

Stewart Dalby, Chair, the Friends of the Scrubs

3 February 2015

Annex 3

Questions

Question 58 – **Tall buildings** (and other site-specific locations, e.g., Opportunity Areas)

Amended definition in Glossary.

When any building, including extensions to existing buildings, is proposed taller than 27 metres (equivalent to approximately nine residential storeys), whether it is significantly taller than those around it or not, there should be an automatic trigger for special assessment.

There needs to be allowance for different floor heights for different uses, therefore the actual height, including any visible roof-top equipment, should be quoted for every relevant scheme.

The location of tall buildings is of paramount importance and special attention should be paid to the historic context.

The following is summary *Guidance on Tall Buildings* prepared by English Heritage and CABE, 2003.

This English Heritage/CABE guidance seeks to:

- Enable areas appropriate for tall buildings to be identified in advance within the local development plan or framework;
- Enable proper consultation at the plan-making stage on the fundamental questions of principle and design;
- Reduce the scope for unnecessary, speculative applications in the wrong places;
- Protect the historic environment and the qualities which make a city or area special;
- Highlight opportunities for the removal of past mistakes and replacement by development of an appropriate quality;
- Set out an overall vision for the future of a place.

Location of Tall Buildings

- Tall buildings should not be positioned where they
- Obstruct views from key vantage-points;
- Have a detrimental impact on the historic environment;
- Have a significant adverse impact on the amenity of nearby occupiers.

Tall buildings may be appropriate

- Close to good public transport infrastructure;
- Close to other tall residential or commercial clusters of tall buildings where it can be demonstrated that a new tall building serves to raise the quality and coherence of the cluster;
- At locations where the provision of a landmark building would clearly improve the legibility of the city.

The Council supports the view of bodies such as English Heritage that the location selected for a tall building be suitable in terms of its effect on the historic environment at a city-wide as well as a local level. If the location is not suitable, then no tall building would be acceptable, however good the design. Only if it can be demonstrated that the location and context are appropriate will other factors - including design quality - be addressed.

This guidance specifically relates to locations where the special historic character makes it sensitive to change of any kind, particularly any change to the existing balance of dominance between structures and open spaces. In line

with good conservation practice such an assessment should be based on a comprehensive assessment of historic character rather than assumptions about how well a place could, or could not, accommodate a tall building.

Design Criteria

A key failing of tall buildings has been the way they meet the ground and therefore how they are perceived/experienced at a short distance.

Ultimately the aim should be to create a public realm with a human scale. Human scale need not necessarily be prejudiced by high buildings, provided that these are carefully located, designed with a top and a bottom and have regard to effects on the microclimate. This often involves the following:

- The relationship of the building to other structures;
- Stepping down a large mass to its neighbours;
- Ensuring that the ground level - most relevant to the pedestrian experience - is as active and interesting as possible;
- Ensuring that the public realm is naturally surveilled;
- Providing legible and accessible entrances;
- The scale, form, massing, proportion and silhouette of the building.
- The design of the top of a tall building: of particular importance when considering the effect on the skyline.
- The materials used to face the building: samples will need to be submitted.

The special assessment will be looking for buildings that are far better designed than previously and are icons of architectural quality in themselves.

References:

- Creating Excellent Buildings – See 'A guide for clients (CABE, 2003)';
- Design Review – Guidance on how CABE evaluates quality in architecture and urban design (CABE, 2002). See below, 'Role of the Design Review Panel';
- Assessment of views based on accurate/verified visual representations;
- Design Statement;
- Physical Model;
- Material samples.

In addition, tall buildings will also be assessed on:

- An evaluation of the overall density in a particular area;
- Effect on the general environment and microclimate;
- Effect on the historic environment;
- Accessibility to public and road transport;
- Contribution to legibility/permeability of the wider area;
- The public accessibility of the building;
- Sustainability.

Public art

In addition to contribution to the public realm through S106 or CIL agreements, the principle of providing - or contributing to - public art should also be considered an obligation if agreed by the Council, or payment made in lieu.

Objectives of the Tall Buildings Policy

To summarise: The overall objectives of the policy are as follows:

- To ensure that any proposed new tall building would reinforce the attractive and varied qualities of the borough's built environment in order to create a positive image and identity;
- To ensure any new proposed tall building would be of a high standard of design and of architectural excellence, ensuring that it is sympathetically integrated within the local and city context, and respects principal views across the city and adjoining boroughs;
- To ensure any proposed new tall building satisfies sustainable development objectives (as expressed through sustainability appraisal);
- To ensure that any proposed new tall building would preserve and enhance the character and appearance of Conservation Areas, and other areas, and listed buildings of special interest and character.

Role of the Design Review Panel

The role of the Design Review Panel is to provide advice to the Council and potential applicants on the suitability of designs for particular site locations.

The Council will appoint members of the panel and ensure that it is:

- Made up of a variety of professionals and appropriate lay persons who have an understanding of design and the built environment, and the historic context of the borough;
- Selected openly and the names published;
- Transparent in its mode of operation;
- Making public an accurate summary of all panel reviews.

Rosemary Pettit, Chairman. 20 February 2015

END