

1 December 2015

## Pre-application advice note

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<b>Site:</b>	115-129A, 93-97A and 99-101 Scrubs Lane, NW10
<b>Proposal:</b>	Mixed use development with residential use over ground floor commercial
<b>Applicant:</b>	Aurora Developments Ltd and Delta Holding Ltd
<b>Date of meeting:</b>	17 November 2015

### Background

1. This advice note provides a summary of the discussions at our meeting of 17 November. The meeting was an opportunity to summarise the position on viability following an assessment of the initial appraisal work and to use this information to look at modelling alternative densities across the two sites.
2. This report constitutes a joint response by OPDC and the GLA. The advice given by officers is provided in good faith and without prejudice to any future decision of OPDC or the Mayor of London in relation to a formal planning application.

### Viability

3. Place-making is essential to the delivery of a comprehensive and coherently developed place. Design is a crucial element of the process but viability plays an important role which is why early discussions on viability are welcomed to help inform an acceptable design.
4. The meeting was held after the conclusion of a high-level assessment into the viability of the two developments that was set out in preliminary work by DS2. The assessment was undertaken by third-party viability consultants appointed by OPDC and was intended to review the high-level assumptions behind the applicants' preliminary work to see whether any were unreasonably impacting on overall scheme viability. Small changes to inputs can result in more significant changes to the viability outcomes.
5. The assessment demonstrated that some of the assumptions adopted by the applicants could be considered overly cautious and that it would be reasonable to model alternative scenarios to understand the impact of changes to some of those assumptions on scheme viability. OPDC officers recognise that the viability situation is challenging on both sites and that the suggested density of 350 d/ha in the OAPF for this sensitive edge location may need to be applied flexibly in order to generate a viable development that can contribute to affordable housing and other infrastructure. Equally, OPDC has previously outlined significant concerns with the original scheme which had a density of 820 d/ha. The exercise was able to show that density options at 450 dwellings per hectare (d/ha) and 550 d/ha could potentially generate sufficient value to incorporate a proportion of on-site affordable housing if alterations were made to a number of the assumptions. Whilst OPDC and the

applicants have not formally agreed the conclusions of either assessment, it forms a useful basis for discussions going forward.

6. Having considered the conclusions of the preliminary viability work, the meeting was an opportunity to look at the design merits of development between the 450 d/ha and 550 d/ha figures. This exercise was without prejudice to any future decision on the acceptability of the final affordable housing offer.
7. It was noted that further, detailed viability work would be needed once greater clarity on the design was available. Clearly the height, form, layout and detailed design will have implications for scheme viability which will be need to subject to a more rigorous assessment once the design is fixed.

## **Design**

8. The architect presented 3 alternative density options at 450, 500 and 550 d/ha. The layout and general form was consistent on each option, with the increased density reflected in more height to the tower and shoulder of the southern site and the tower of the northern site. The shoulder element of the northern building remained at 4 storeys on each option in recognition of the position on the boundary of the proposed Cumberland Park Factory Conservation Area.
9. Of the three options presented, the most favourable option for the southern site is 450 d/ha with the building height at 20 and 8 storeys but more analysis is needed to examine the impact on the St Mary's Cemetery conservation area, Kensal Green Cemetery and the setting of the Grand Union Canal. At 20 storeys, the tower still significantly exceeds the scale of development envisaged for this location in the OAPF and further work will need to be undertaken in terms of the form, detailing and townscape assessment before a building of this height would be considered acceptable. It would be helpful to test some variations on building heights (tower and shoulder building) within the parameters of this option, in order to strike an appropriate balance between the height of the tower and the shoulder building.
10. At 550 d/ha, the prominence of the tower, at 24 storeys, is increased to an extent that would relate unsympathetically to the character of the area and the pattern of development that is outlined in the OAPF.
11. The preferred option for progressing detailed design work on the northern site is 450 d/ha with building height at 11 and 4 storeys. Whilst there is some rationale for a taller building on the southern site, given its position close to the Mitre Bridge, this does not extend to the northern site. Development on this site should begin to decrease in height and density in recognition of the two storey buildings in the proposed Cumberland Park Factory Conservation Area.
12. Although the level of information regarding the form and detailed design is understandably limited at this stage, the principle of setting back the top storeys of the shoulder building could be acceptable. This helps to reinforce the subservience of this element in relation to the tower and to reduce the massing of the frontage onto Scrubs Lane. One option looked at replicating this approach on the tower of the southern site but this element should remain as a clearly defined tall building.

## **Summary**

13. The advice in this letter regarding the design merits of the schemes is made without prejudice to future discussions on the viability of the developments. It should be noted that the comments are only intended to inform further design work in an attempt to reach consensus about a scale and form of development that may be acceptable on the site. It is anticipated that further negotiations will then be required regarding the provision of affordable housing and contributions to other infrastructure.
14. OPDC officers look forward to continuing discussions on the design of the scheme prior to a review by OPDC's independent PLACE review group on 16 December.