

18 December 2015

Pre-application advice note

Site:	115-129A, 93-97A and 99-101 Scrubs Lane, NW10
Proposal:	Mixed use development with residential use over ground floor commercial
Applicant:	Aurora Developments Ltd and Delta Holding Ltd
Date of meeting:	2 December 2015

Background

1. This advice note provides a summary of the discussions at our meeting of 2 December and a response to the scheme presented on 16 December to the Old Oak and Park Royal PLACE review group. Our previous meeting on 17 November was followed by an advice note that was issued on 1 December. We had agreed in that correspondence to continue pre-application discussions without prejudice to the outcome of a final viability assessment which is expected to impact on the balance between the height and density of development, and the amount of affordable housing and other social infrastructure that could be provided.
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.

South – Plot B

3. In our correspondence of 1 December we had suggested that 450 dwellings per hectare (d/ha) was the most appropriate density out of three options that were presented for the southern site. The scheme that was shown comprised 500 d/ha with the tower at 22 storeys and the shoulder building at 8 storeys with an additional storey set back from the main façade. At this height the tower significantly exceeds the height and density envisaged for this site in the OAPF. We are particularly concerned about the bulk of the 9 storey building which appears to be overscaled for the setting of Scrubs Lane and also fails to respond positively to the setting of St Mary's Cemetery or the Canadian War Memorial, and we would encourage further consideration and refinement of the massing and arrangement of this element. It was clear from the presentation that the design had begun to be explored in more detail but more work will need to be undertaken, particularly in terms of the townscape assessment, before a development on this scale could be considered favourably.
4. The presentation included a number of interesting proposals on the building elevations, such as the approach to the external balconies on the tower which introduces some articulation to the façade. A building of this height should not include a prominent 'lantern' feature on the top of the tower owing to the proximity to sensitive uses such as St Mary's Cemetery. The design of the top of the tower will require careful consideration to ensure that it is calm, refined and elegant. The most important consideration for the next stage of

façade design development is to explore the character of the area in more detail and ensure that the design of the buildings responds positively to this context. The industrial use of the existing buildings, the proximity to the Grand Union Canal and St Mary's Cemetery, the prominent frontage onto Scrubs Lane all offer a rich and varied setting which should inform the design. OPDC expects existing character to inform the design process. This is a critical step in ensuring that the development makes a positive contribution to local distinctiveness and a varied streetscene.

5. The position of the building and its relationship with the public realm of Scrubs Lane should be reconsidered. The current plans show the front elevation set back several metres from the pavement in order to provide a carriage driveway to the front of the building, which is unacceptable in placemaking terms and will compromise the creation of a strong urban edge to Scrubs Lane. This also results in three crossovers for private vehicles which is excessive and undermines the quality of the pedestrian and cycle environment. Lay-by space should be incorporated into the public realm to provide for delivery/servicing vehicles if they cannot be accommodated in the basement. The arrangements for this including the justification for not utilising the basement will need to be discussed and agreed with LBHF as the highways and waste collection authority. Furthermore, we are concerned about the negative impact of the double carpark ramp located at the base of the tower next to the main residential entrance. In its current configuration this is likely to undermine the quality of this critical part of the development, and consideration of reducing the scale of the ramp and/or relocating it would be encouraged.
6. We had previously suggested that the principle of setting back the top storey of the shoulder building could be acceptable but having seen more detail of this arrangement on plan, a simpler approach would be to extend the top floor across the shoulder building. This would have the additional benefit of providing a larger area of roof space for amenity purposes – and we would encourage the creation of a spectacular green rooftop amenity space here which could also visually soften and enrich the buildings appearance.
7. It was useful to understand the range of demands on ground and basement floor space at this stage of the process. It is important to ensure that the ground floor frontage is activated as much as possible which should be considered as the plans for the basement and ground floor progress. Opportunities for increasing the commercial space beyond 220sq.m should be explored, particularly given the amount of ground floor space currently provided for bin storage and cold water storage. One option may be to relocate some of the plant and storage space to basement level and reduce the amount of car parking, given the excellent access to public transport that will come forward in the near future.
8. The plans for the amenity space to the side and rear of the building requires more consideration as this is potentially an important component for residents in the development but it is potentially a challenging and overshadowed location and currently it is unclear what the vision for this space is. It should be considered in the context of Policy 3.6 of the London Plan which requires formal playspace for children. We would be supportive of the creation of a new access point into St. Marys Cemetery if the agreement of the Cemetery owners is secured.

North – Plot D

9. The detailed design for this building was less advanced than plot B at the time of our meeting. In terms of the height and massing, the proposals have retained the 4 storey element adjacent to the proposed Cumberland Park Factory Conservation Area, but the taller element was shown at 13 storeys. We had previously advised that this site is sensitive

given its location and had advised, of the three options presented previously, that the 11 storey building was the most appropriate. 13 storeys also results in a more marked contrast to the 4 storey section which undermines the rationale for including this lower element. More detailed consideration will be required of the height and relationship between the lower element and the adjacent historic buildings, as it will be essential that this development does not negatively impact the setting of this anticipated conservation area. OPDC will also expect the applicant to discuss the relationship of this proposed building with the adjacent site to the south. The scheme must ensure that the proposals are feasible given the location of the proposed building on the boundary and the fact that windows are proposed in the south elevation.

10. We have already discussed the possibility of reducing the parking provision in this building which has resulted in the removal of the basement. The current plans show that the ground floor has accommodated some of the car parking but this should be revised. It is very important that a new building has an active frontage at ground floor level so the commercial unit should be significantly increased in size. The removal of the car parking can be justified in this instance given the access to public transport which will improve as part of the regeneration of Old Oak Common. This will provide an opportunity for a viable commercial use whilst ensuring space for services and cycle storage.

Summary

11. 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.
12. We have only seen a limited number of views of both buildings in our meetings to date. It would be useful to see the proposals from more vantage points to better understand the impact of the proposals.