

## OPDC DRAFT LOCAL PLAN

### HEARING STATEMENT FROM ST QUINTIN AND WOODLANDS NEIGHBOURHOOD FORUM (REP 82) AND OLD OAK NEIGHBOURHOOD FORUM (REP100)

#### Matter 5

*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.)*

*Notwithstanding the officers' response to the Key Issues and representations set out in Appendices E and J to Key Document 5, this Matter would benefit from a discussion at a hearing session.*

The policies in the Draft OPDC Local Plan on Tall Buildings are a product of the extreme hyper-densities for housing, as being examined under Matter 4 of these EIP hearings. Policies SP2 (Good Growth) SP4 (Thriving Communities) SP6 (Places and Destinations) SP9 (Built Environment) and SP10 all include elements and clauses which lead to a requirement for building heights at levels not hitherto seen in or near Old Oak or the wider area of north-west London (the 35 storey tower on the Imperial White City campus, approved by LBHF in 2016, is the first building on anything like this scale in the area, as the New London Architecture annual survey of tall buildings in London shows).

These density requirements are in turn driven by a housing target that is itself an example of top down planning, imposed on an area rather than planned on the basis of what the available land in the area can successfully sustain.

There are other forms of high density living than very tall residential towers. It is essential that the EIP unpicks the extent to which the built form and design of a new Old Oak is now largely predetermined.

Many OPDC Local Plan policies (as drawn up in recent draft SPDs on daylight, sunlight, passive energy performance, and waste disposal) are based on assumptions that technological solutions can be found, for buildings of 60 storeys and more. The Isle of Dogs Opportunity Area (with buildings of 70 storeys plus endorsed by the Mayor of London) are examples of where Old Oak may be heading.

Paragraph 3.80 states *Tall buildings are defined in OPDC's evidence base as buildings providing 15 or more residential storeys or being 48 metres above ground level. Figure 3.15 shows the locations within the OPDC area where tall buildings have been identified to be appropriate in principle.* This tells the public very little about the likely height of developments at Old Oak, Scrubs Lane, North Acton and the other main residential areas within the OPDC boundary.

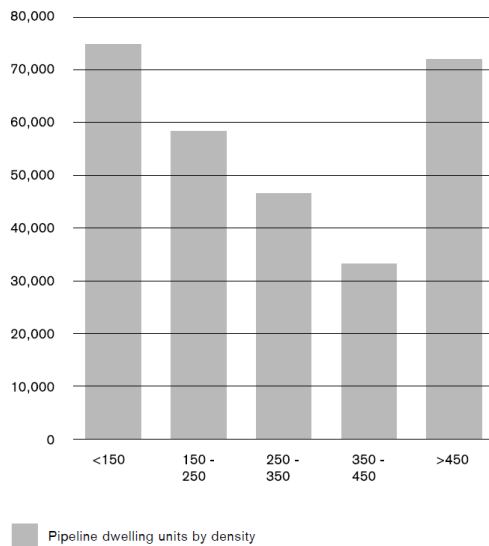
**As commented on in earlier representations on the Regulation 19.1 and 19.2 Local Plan, this Draft Local Plan has become less informative on densities and building heights at each iteration. This conflicts with basic principles in NPPF paragraphs 154 and 155 that *Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where.***

**And that *Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential.***

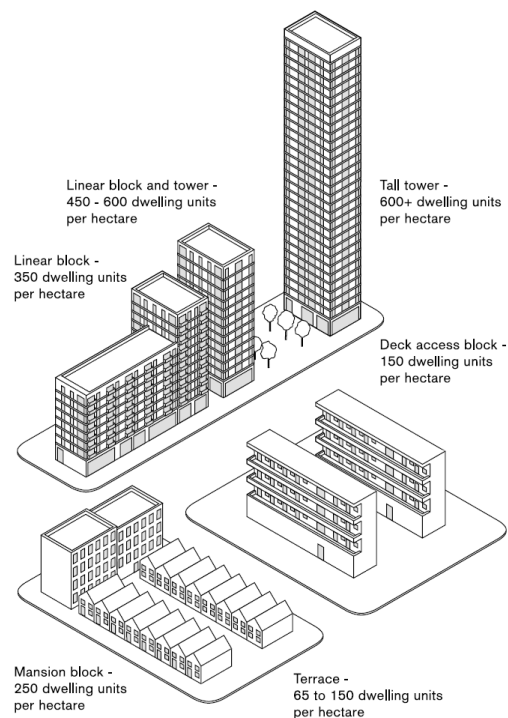
The Draft Local Plan gives no honest explanation of the implications of the proposed *average* density of 600n units per hectare (Old Oak North Development Framework Principles Page 52 PR13 on Development Capacity) reads *The average density will be 600 units per hectare. This will vary across the place in response to public transport access, sensitive locations and site specific circumstances.*

The Mayor’s Design Advisory Group publication *Growing London* (undated) includes an analysis of the relationship between density and ‘building typology’. The document argues the case for increasing density well beyond the levels in the 2015 London Plan Density Matrix. The case is argued partly on the basis that this is already happening and secondly that it is necessary to accommodate the desired overall housing target for London.

Over a quarter of London’s development pipeline is above the maximum density set by the London Plan Density Matrix.



Density typically corresponds with building typologies.



**7c. Wherever there are plans for clusters or neighbourhoods of tall buildings such as in Opportunity Areas, Planning Frameworks should provide more specific guidance. This guidance will need to be informed by standardised methodologies and tools, compiled through research, for assessing the aggregate visual, environmental and social impacts of such developments.**

*Growing London* recommends that ‘planning frameworks’ should provide ‘specific guidance’ on area where there are plans for clusters of tall towers, such as in Opportunity Areas. The OPDC continues

to assemble such guidance, in terms of SPDs on technical issues such as waste disposal and passive heating in very tall buildings.

But the Draft Local Plan itself, and its supporting studies, provide the general public with very little clue as to the scale and building heights proposed at Old Oak. The Tall Building Statement (for example) is an exercise in obscuring information. It defines a 'tall building' as *a minimum of 15 storeys* and states *a range of 8 to 12 storeys is considered to be an appropriate height range for the shoulder and/or podium of development at the densities envisaged for the OPDC area. (This density is set out in OPDC's Development Capacity Study). This informs the definition of a tall building for the OPDC area).*

How are the general public meant to understand what is meant by a '*shoulder and/or podium of development*'? Or what in reality will prove to be the height of residential towers at Old Oak? The information on 'precedents' in the documents similarly gives figures for podium and shoulder heights. Nowhere is there any acknowledgement that an average density of 600 units/hectares at Old Oak North is likely to require at least some towers at 40-60 storeys. Nor that residential towers at 40 storeys plus are already being approved for development at North Acton.

### **Conclusion**

**The current OPDC Draft Local Plan and supporting studies fails a very basic test of being clear with the public, on building heights and the 'new building typologies' that will be required to achieve housing targets (and the targets in individual site allocations) within the OPDC area.**

### **Modifications required**

**An indicative range of building heights explained in the Tall Building Statements and in the body of the Draft Local Plan**

**Anticipated housing densities added as a column in the schedule of site allocations at Table 3.1 in the Draft Plan.**

Henry Peterson MA DipArch(Cantab)  
Chair, St Quintin and Woodlands Neighbourhood Forum  
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