



ENGLISH HERITAGE
LONDON OFFICE

Mr E Bird
Greater London Authority
City Hall
The Queen's Walk
More London Riverside
London SE1 2AA

20th January 2015

Dear Edmund,

Old Oak Common Historic Areas Assessment Addendum

Further to our site visit to Old Oak Common on Friday 17th October 2014 and subsequent meeting at City Hall on 6th November, as part of our ongoing discussion about the management of heritage assets and the historic significance of this area, I am pleased to be able to offer you the following advice and maps. These should be read as an update to English Heritage's *Outline Historic Area Assessment Report* (2013) and in conjunction with the advice contained in our letter dated 3rd September 2013, which responded to the Mayor's document *A Vision for the Future* (June 2013). This letter offers advice on how the heritage significance of this area can be appropriately managed, in a way that is proportionate to its importance, and takes account of the demolition of numerous buildings on the site since the report was undertaken.

This advice is given in the context of the significant change to this large site that is currently being planned as part of the Old Oak Common and Park Royal Opportunity Area Framework. English Heritage is pleased to work with the new Mayoral Development Corporation and the GLA to secure sustainable development, as defined by the National Planning Policy Framework (NPPF), on this site. This is because, in our opinion, there is great potential for some of the existing locally significant buildings on the site to help create a unique sense of place, linking new developments with the rail and industrial heritage of the site. This could be through their adaption and reuse or by providing references for the design of new development.

English Heritage supports the principle of creating a Local List, and is pleased to offer comments on this in line with our guidance *Good Practice Guide for Local Heritage Listing* (2012). Similarly, both through our initial study, our work with the London Legacy Development Corporation on the extension of the Hackney Wick and Fish Island Conservation Areas, and our recent follow up site visit, we can also offer advice on the creation and extension of Conservation Areas at Old Oak Common. This builds on the guidance contained in our publication *Understanding Place: Conservation Area Designation, Appraisal and Management* (2012).



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST
Telephone 020 7973 3000 Facsimile 020 7973 3001
www.english-heritage.org.uk

English Heritage is subject to the Freedom of Information Act. 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



ENGLISH HERITAGE

LONDON OFFICE

Creation of a Local List

The creation of a list of buildings of local significance is, in first instance, a matter for the local planning authority. Best practice encourages engagement with the local community and other stakeholders in drawing up criteria for the local list which capture what is most significant about an area. In this case, obvious criteria for selection could be buildings and structures that are particularly good examples of the development of historic infrastructure (canal and rail) and industry around Old Oak Common. English Heritage has produced selection guides for industrial and transport structures which can be found on our website <http://www.english-heritage.org.uk/caring/listing/criteria-for-protection/selection-guidelines/guidance> which may be useful in this regard. Our guidance on local heritage listing also includes points to consider when developing local selection criteria which focus on the local historic distinctiveness.

Having reviewed the proposed management maps that you sent us, we agree that it would be beneficial for the site's management to combine the 'local' and the 'minimal' significance categories. As such we have updated the maps to show buildings of 'local significance', with a few exceptions where demolition has taken place or further information indicates that the buildings are not sufficiently important to merit consideration in the planning process. We also consider there is merit in highlighting those buildings worthy of consideration for a local list. This will allow the significance of these buildings to be properly considered as part of the planning system in line with paragraph 135 of the NPPF. Accordingly, we have made these revisions to the maps and are pleased to attach these revised versions with this letter. However, we would encourage you not to think of this list as definitive or binding as you may decide, following further consideration of site specific criteria and the significance of different buildings, that some are not worthy of entry on the local list and others may be. As noted above, it is up to the LPA, in this instance the Old Oak Common MDC, to manage the local list.

Creation or extension of Conservation Areas

English Heritage's Initial Scoping report suggests that the section of the Grand Union Canal south of Kensal Green Cemetery, which includes the two late 19th century gasholders, merits being considered for designation as a conservation area. We note that sections of the Grand Union Canal in Ealing, Westminster, Hillingdon and Hammersmith and Fulham, are covered by conservation areas, including the adjoining section in Hammersmith and Fulham that will be within the MDC boundary. While it has been suggested that the section of the canal south of the cemetery could be included in an extension to the Kensington and Chelsea's Kensal Green Cemetery Conservation Area, we note the cemetery is outside the MDC's boundary. Furthermore, given the very different characters of the canal and the cemetery, we would question if this was the most appropriate solution and would suggest that the creation of a new canal focused conservation area might be more appropriate.

Similarly, the maps you provided us with currently propose extending Hammersmith and Fulham's St Mary's Conservation Area, which covers the St Mary's Roman Catholic Cemetery, to include a group of industrial buildings and a terrace of small houses on Scrubs Lane. As with Kensal Green Cemetery and the canal, it would appear that the character of the buildings on Scrubs Lane is very different to the existing conservation area. Since these buildings form an interesting historic group, which ties in with the industrial heritage of the



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001
www.english-heritage.org.uk

English Heritage is subject to the Freedom of Information Act. 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



ENGLISH HERITAGE

LONDON OFFICE

area, alternative approaches might be to include this group as a satellite element of the existing Hammersmith and Fulham Grand Union Canal Conservation Area, or to create a distinct new conservation area.

The final area you identify as a possible conservation area is Brunel Road and Telford Way, known as the Westway Factory Estate. Of the three areas proposed this may be the most contentious given the large number of mundane contemporary warehouse buildings on this industrial estate. Nevertheless, our site visit identified at least four high quality moderne style buildings that are on this estate, which we would agree merit consideration for local listing by the local planning authority, if they have not been demolished. There are six other buildings in the estate that also appear to date to the interwar period, but these are simpler in their architectural aspirations. In our view further investigation into the background of the estate would be necessary if it is to be considered as a conservation area. Nevertheless, the four buildings identified above, even when considered in isolation, have sufficient character to provide an exciting opportunity for future development to draw on the historic environment to create a rich sense of place.

Other historic environment management considerations

As part of any proposals for heritage in this area, it is important to consider how the setting of the highly significant designated assets that are in close proximity to the site will be managed. These assets are described in some detail in Part III of the *Outline Historic Area Assessment*, and will be of particular importance when considering the location of tall buildings in the Old Oak Common site masterplan. We would strongly recommend that the impacts of tall buildings are considered at the plan making stage, in line with the NPPF, which states that significant adverse impacts on the economic, social and environmental dimensions of sustainable development should be avoided (paragraph 152). The most notable asset in the vicinity to the site is Kensal Green Cemetery. This Grade I registered Park and Garden of Special Historic Interest, contains 139 individually listed structures and monuments (Grades I, II* and II) and is the first of the so-called 'Magnificent Seven' Victorian Cemeteries in London, modelled on the famous Père Lachaise Cemetery in Paris. The cemetery is designated as a conservation area by Kensington and Chelsea and benefits from a clear sky setting which enhances understanding of its original location at what was then the edge of London, making this openness a notable contribution to its significance. As such, tall buildings at Old Oak Common could have a severe impact on the significance of the Cemetery and its component parts, to the extent of possibly causing irreversible harm.

We noted in our previous advice that in order to address the requirements of the NPPF and concerns regarding the settings of heritage assets, a detailed visual analysis of the impact of tall buildings upon Old Oak Common and its surroundings should be undertaken, and understand that a Views Study is being produced. We would welcome the opportunity to help inform and participate in the development of this study as both a key evidence base for the planning framework, and potentially as a tool for subsequent development management. This will be an important tool to help guide the location and design of new buildings to avoid harm and ensure that they sustain and enhance heritage assets.



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001
www.english-heritage.org.uk

English Heritage is subject to the Freedom of Information Act. 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



ENGLISH HERITAGE

LONDON OFFICE

In addition to its exceptionally high degree of designation, a further management consideration for Kensal Green Cemetery is that it (both the registered park and garden, and 35 structures and monuments within it) is currently on English Heritage's Heritage At Risk (HAR) register. As such it would be worth considering what elements of the Cemetery's Conservation Management Plan could be supported or strengthened by development at Old Oak Common, to help mitigate any harmful impacts that new development might have and as part of your positive strategy for the conservation and enjoyment of the historic environment.

Finally, one area of potential heritage significance that the *Outline Historic Area Assessment* purposefully did not cover is archaeology. While some of the site has already undergone investigation as part of the Crossrail project, given the size of the overall site we would encourage you to discuss the consideration of archaeology with Gillian King at the Greater London Archaeological Advisory Service (GLAAS).

Conclusion

English Heritage is pleased that the GLA and future MDC are looking in detail at the heritage significance of the opportunity area with a view to developing a high quality new piece of the city. We would welcome the opportunity to work with you as you develop your heritage policies to ensure that your development plan has a positive strategy for the conservation and enjoyment of the historic environment in line with the NPPF, and will lead to sustainable development in this large area. We are particularly keen to continue the discussion on how the impacts of development at Old Oak Common on the heritage significance of Kensal Green Cemetery can be managed, for example with the views study.

We hope this advice is of assistance, and would be happy to discuss any points related to it with you further. For the avoidance of doubt, this does not affect our obligation to provide further advice, and, potentially object to specific proposals where English Heritage considers it appropriate to do so.

Best regards

David English

Historic Places Adviser

E-mail: david.english@english-heritage.org.uk



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

Telephone 020 7973 3000 Facsimile 020 7973 3001

www.english-heritage.org.uk

English Heritage is subject to the Freedom of Information Act. 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.