OPDC TALL BUILDINGS STATEMENT
LOCAL PLAN SUPPORTING STUDY
JUNE 2018

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EXECUTIVE SUMMARY

What is the purpose of the Tall Buildings Statement?

This statement coordinates information from OPDC's Local Plan supporting studies and precedents to provide information for how OPDC's Local Plan polices D5 (Tall Buildings) and SP9 (Built Environment) are in general conformity the requirements of the Draft New London Plan Policy D8. It identifies:

- a tall building definition for the OPDC area; and
- locations where tall buildings are an appropriate form of development in principle and indicates general heights.

What is the tall building definition for the OPDC area?

Above 15 storeys or above a minimum of 48 metres above ground level.

Where are tall buildings an appropriate form of development in principle and what are the general heights considered to be appropriate?

Tall buildings are an appropriate form of development in principle in the locations depicted in figure 2. Please note that this figure is illustrative. Within these locations tall buildings will be a component form of development within a range of building heights. Heights of individual tall buildings will continue to be determined in accordance with all relevant policies within the Development Plan and any relevant material considerations.

These locations may change reflecting the evolving context of the OPDC area as an Opportunity Area. Changes will be used to inform future updates to the Local Plan.

Identifying general heights of tall buildings is not considered to be appropriate at this time. This is due to the evolving context of the OPDC area as an Opportunity Area and recognising the area-specific complex circumstances in planning and delivering priorities for affordable housing, commercial uses, local and nationally significant infrastructure, new street networks, high standards of sustainability, securing deliverability of development and addressing multifaceted challenges. However, where appropriate within the Local Plan place policies, general shoulder and/or podium heights are defined based on recommendations by supporting studies. As further supporting studies are developed and challenges are resolved, OPDC will provide guidance for general heights of tall buildings in future versions of the Local Plan and in forthcoming Supplementary Planning Documents.

1. INTRODUCTION

What is the purpose of the Tall Buildings Statement?

1.1 This statement coordinates information from OPDC's Local Plan supporting studies and precedents to provide information for how OPDC's Local Plan polices D5 (Tall Buildings) and SP9 (Built Environment) are in general conformity the requirements of the Draft New London Plan Policy D8. It identifies:

- a tall building definition for the OPDC area; and
- locations where tall buildings are an appropriate form of development in principle and indicates general heights.

What are the requirements of the Draft New London Plan?

1.1 The requirements set out in Policy D8 of the Draft New London Plan are:

- Policy D8(A) requires Local Plans to define what is considered a tall building, the height of which may vary in different parts of London.
- Policy D8(B) requires Local Plans to:
    - identify on maps where tall buildings will be an appropriate form of development in principle
    - indicate the general buildings heights that would be appropriate taking account of:
        - visual, functional, environmental and cumulative impacts of tall buildings
        - potential contribution to new homes, economic growth and regeneration
        - public transport connectivity of different locations
- Paragraph 3.8.2 identifies that in Opportunity Areas, definitions of tall buildings should relate to the evolving context.

1.2 Please note that as the London Plan continues to be developed, this policy may change. Any required amendments to this statement will be undertaken in response to changes to inform future versions of the location plan.

2. TALL BUILDING DEFINITION

What is OPDC's tall building definition?

- Above 15 storeys or a minimum of 48 metres above ground level.

How has this been defined?

Review of information

2.1 The methodology used to define a tall building in the OPDC area reflects the evolving context of developable land within Old Oak and Park Royal. This is required by the Draft New London Plan. This definition is based on a review of:

- recommendations from OPDC Local Plan supporting studies; and
- defining a range of building heights of shoulder and/or podium components of
    - high density precedent schemes from within London, comparable to the scale of development within the OPDC area; and
    - OPDC permitted schemes.

2.2 The information used in the review and recommendations from supporting studies are set out in the appendix.

2.3 Based on the review, 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.

Measuring building height

2.4 In defining a tall building, both storeys and metres above ground have been used. This recognises that using storeys provides a simple way to illustrate height. However, this also recognises that storey heights vary between land uses and therefore metres above ground is also a useful measure. Metres above ground has been used as opposed to Above Ordinance Datum as the wider topography of the OPDC area does not significantly vary when compared to other areas of London. Therefore, metres above ground provides an appropriate measure for defining tall buildings.

2.5 The definition provides a minimum height for a tall building. Residential floor-to-floor storey heights are typically lower than those of non-residential uses. Nationally described space standards for dwellings requires them to have 2.5m floor-to-ceiling height. An assumption of 0.7m between ceiling and floors has been made based on local OPDC permitted schemes to provide a floor-to-floor height. This process identifies that for each residential storey the floor-to-floor or storey height is 3.2m. Therefore to define the minimum height of a tall building, a residential-only tall building has been used to inform the definition of a tall building.

Defining a tall building

2.6 Based on the above information, it is recommended that an indicative average range of shoulder heights of development within the OPDC area is likely to be 8 to 12 storeys (25.6 to 38.4m). An assumption of three additional storeys (9.6m) has then been applied to account for site specific circumstances before reaching a height considered to be a tall

building. Therefore, a tall building in the OPDC area is defined as above 15 storeys or above a minimum of 48m above ground level. This is illustrated in figure 1. Above this height, proposals will need to accord with the relevant London Plan and Local Plan tall building policies in addition to all other relevant development plan policies and material considerations.

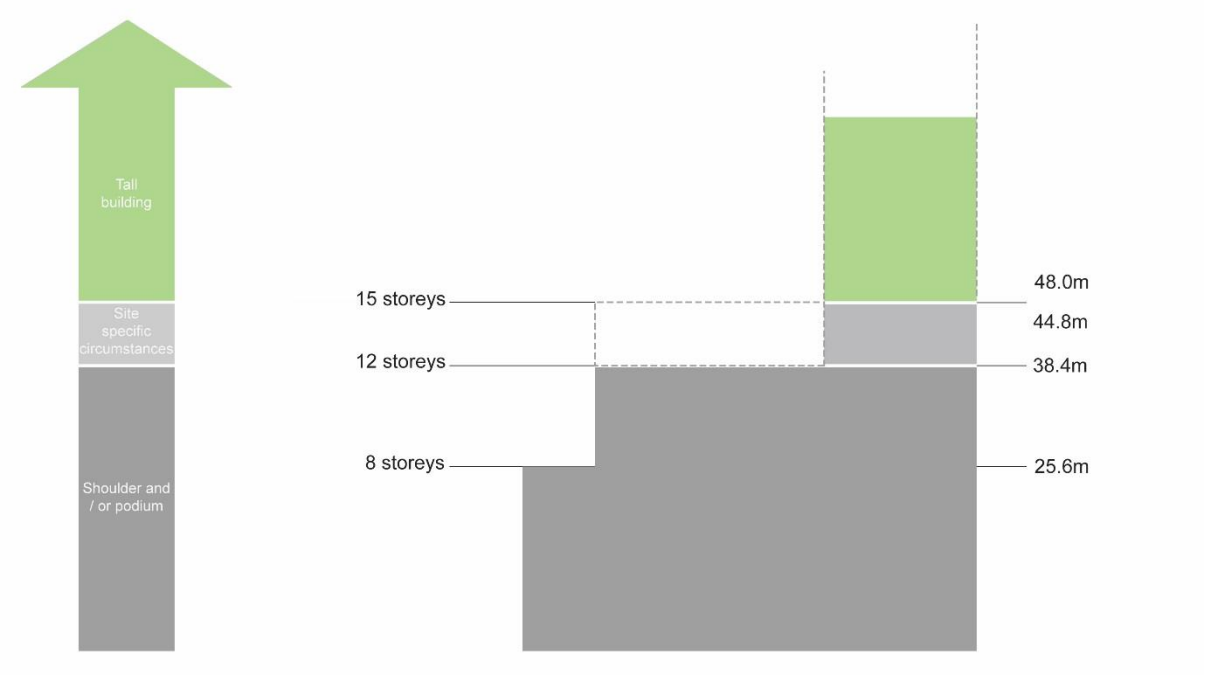


Figure 1: Defining a tall building

3. TALL BUILDINGS LOCATIONS AND GENERAL HEIGHTS

Where are tall buildings an appropriate form of development in principle?

3.1 Tall buildings are an appropriate form of development in principle in the locations depicted in figure 2.

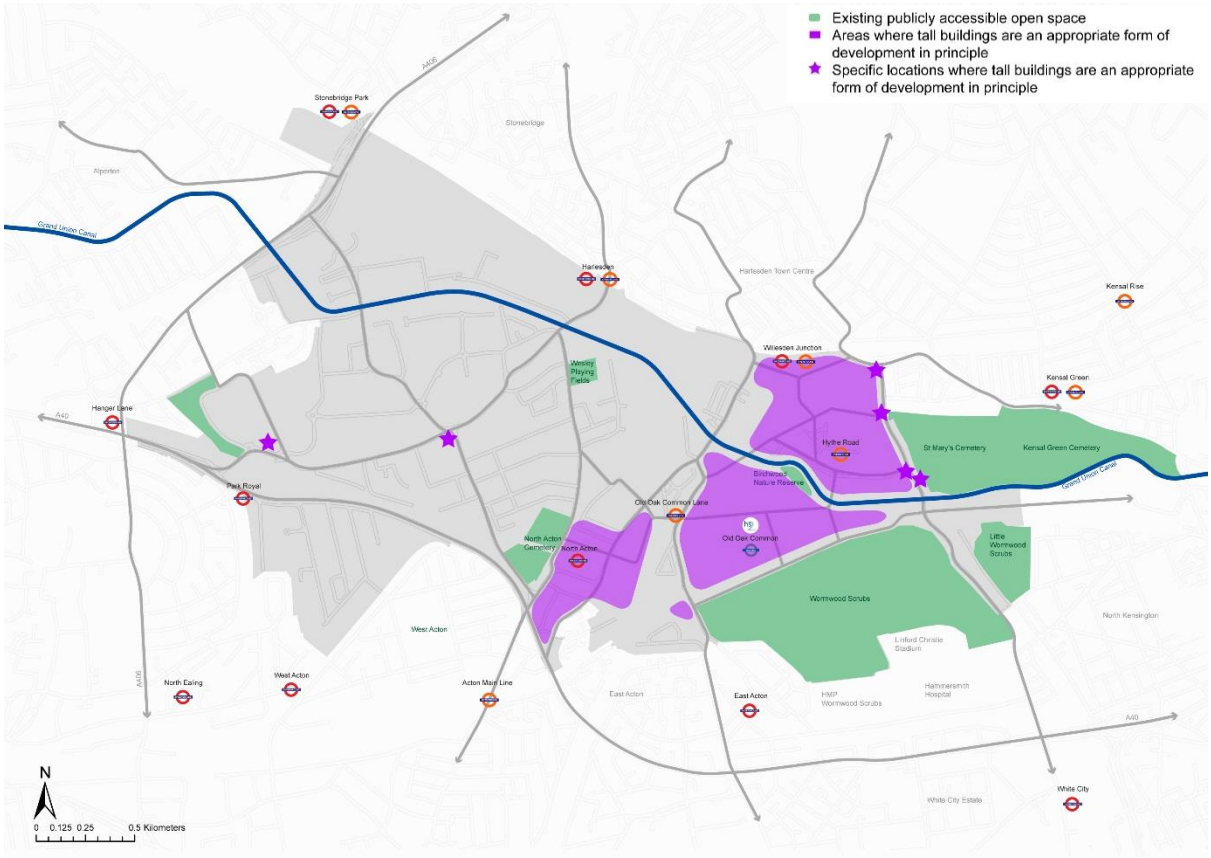


Figure 2: Map of locations where tall buildings an appropriate form of development in principle

3.2 Please note that this figure is illustrative. Within these locations tall buildings will be a component form of development within a range of building heights. Heights of individual tall buildings will continue to be determined in accordance with all relevant policies within the Development Plan and any relevant material considerations.

3.3 These locations may change reflecting the evolving context of the OPDC area as an Opportunity Area. Changes will be used to inform future updates to the Local Plan.

How have these been defined?

3.4 These locations have been informed by OPDC Local Plan supporting studies recommendations and the requirements set out in the Draft New London Plan Policy D8. The supporting study recommendations are set out in the appendix.

3.5 The requirements set out in London Plan are to consider the:

- Visual, functional, environmental and cumulative impacts of tall buildings
- Potential contribution to new homes, economic growth and regeneration
- Public transport connectivity of different locations

Impacts

Visual	Visual impacts relate to a considered balance of elements including views, spatial hierarchy of the surrounding context, legibility and wayfinding, architectural quality, heritage assets and glare. Some of these elements are considered to be appropriate to inform plan making at a strategic scale and some are more appropriate to inform the development management process at a site scale. The below information relates to those elements OPDC considers to be appropriate at a strategic scale to inform the Local Plan. Where relevant, rationale for why elements have not be considered is provided. OPDC's Views Study provides a baseline study of views within and surrounding the OPDC area. It identifies important views and provides recommendations and guidelines to shape future development. The views include panoramic views, kinetic views, local views from publicly accessible open spaces, linear views and heritage views. Information and considerations in this statement identify locations within the OPDC area where tall buildings are an appropriate form of development in principle. Proposals for tall buildings will be assessed in light of their impact on the views set out in OPDC's Views Study and any other identified relevant views. Scrubs Lane benefits from a Strategic Views Assessment which has guided the location of the individual tall buildings within this place. Further assessments may be undertaken to inform future versions of the Local Plan and Supplementary Planning Document reflecting the evolving context of the OPDC area. Old Oak will be a major transport hub providing excellent access to new national, regional and local public transport services. It will also be home to a new commercial centre for London, a new major town centre and a range of destination and catalyst uses. Therefore, tall buildings will enable Old Oak to reinforce the spatial hierarchy of the local and wider context by aiding legibility and wayfinding to these nationally and regionally significant destinations. Figure 3 depicts the sensitive locations within and around the OPDC area. These include heritage assets, publicly accessible open spaces and existing residential neighbourhoods. These locations have been used to inform the locations where tall buildings will be an appropriate form of development in principle.
Functional	OPDC's Local Plan is supported by an Infrastructure Delivery Plan. This coordinates information from related studies to successfully demonstrate how the social, physical, green and transport infrastructure needs of development capacity for the OPDC will be met. Therefore, the functional impacts of tall buildings at a strategic level, suitable for planning making, are considered to be accommodated across the OPDC area.

Environmental	The requirements set out for considering environmental impacts relate to site specific circumstances and are not considered to be relevant for plan making. These will need to be assessed on a case-by-case basis.
Cumulative	The cumulative impacts of the above elements have been considered to inform the proposed locations where tall buildings will be an appropriate form of development in principle.

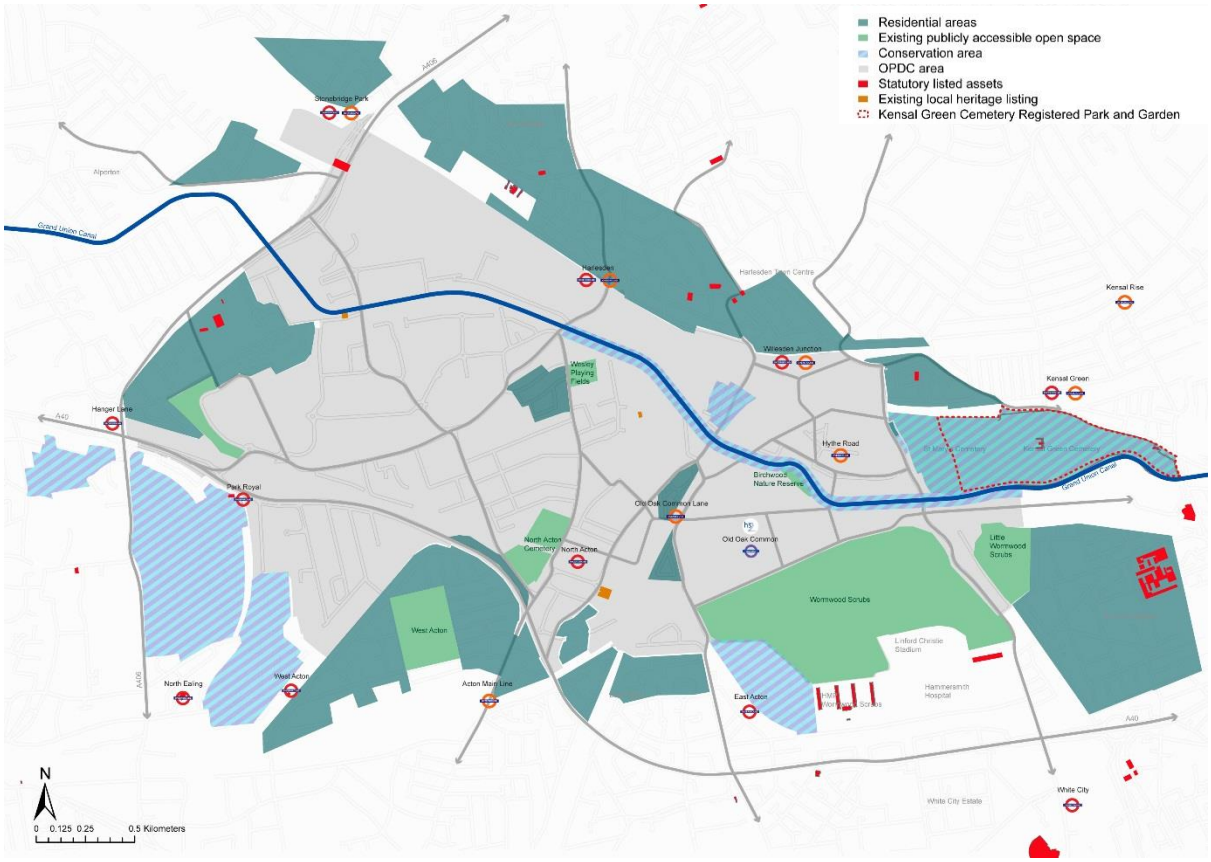


Figure 3: Map of sensitive locations

Potential contribution to new homes, economic growth and regeneration

3.6 The OPDC area is one of London's biggest regeneration opportunities with targets set by the Mayor of London to deliver a minimum of 25,500 new homes and space for 65,000 new jobs to help drive west London's economy and deliver economic benefits for local communities, London and the UK.

3.7 The entirety of the OPDC area is within defined Opportunity Areas set out within the Mayor's London Plan. Opportunity Areas are identified in the London Plan to be appropriate locations to optimise residential and non-residential output and densities.

3.8 The majority of growth identified in OPDC's Local Plan that contributes to meeting the Mayor's targets for the OPDC area is envisaged to be within Old Oak North, Old Oak South, Willesden Junction, Scrubs Lane, North Acton and Acton Wells and Park Royal Centre to support the industrial intensification of wider Park Royal. Therefore, these locations are considered to be appropriate for tall buildings based on their potential contribution to delivering new homes, jobs and wider regeneration benefits.

Public transport connectivity of different locations

3.9 Good access to public transport currently exists in locations close to existing stations and along key routes. Significant enhancements to national, regional and local public transport access are also proposed for the OPDC area. These will deliver the highest Public Transport Accessibility Levels (PTAL) reflecting the provision of excellent public transport access. The locations benefiting from these improvements are particularly concentrated in the Local Plan places of Old Oak North, Old Oak South, Willesden Junction and North Acton and Acton Wells as well as routes connecting to these places. All of these locations achieve a PTAL of 4 or above. Therefore, based on public transport connectivity these locations are considered to be appropriate for tall buildings in principle. Please refer to figure 7.11 in the Local Plan to view existing and future PTALs for the OPDC area.

Other considerations

3.10 This statement has also considered planning permissions for tall buildings outside of the locations defined above. At time of writing, the First Central planning permission (17-0076-FUMOPDC) within the Brewery Cluster has been implemented to deliver a tall building within the Brewery Cluster in Park Royal West. Therefore, this location is also identified as an appropriate location for a tall building in principle.

Defining locations for tall buildings

3.11 Having considered the above elements on balance, the following locations are recommended to be defined in the Local Plan as appropriate for tall buildings in principle:

- Old Oak South
- Old Oak North
- Willesden Junction
- North Acton and Acton Wells
- Park Royal Centre (north east corner of the Park Royal ASDA site allocation)
- Brewery Cluster
- Scrubs Lane Clusters (a single tall building in the following clusters of Harrow Road, Park Road, Hythe Road and Mitre Canalside)
- Westway Estate north of site (north east portion)

3.12 These locations are shown on figure 2.

What are the general heights of tall buildings considered to be appropriate?

3.13 Identifying general heights of tall buildings is not considered to be appropriate at this time. This is due to the evolving context of the OPDC area as an Opportunity Area and recognising the area-specific complex circumstances in planning and delivering priorities for affordable housing, commercial uses, local and nationally significant infrastructure, new street networks, high standards of sustainability, securing deliverability of development and addressing multifaceted challenges. However, where appropriate within the Local Plan place policies, general shoulder and/or podium heights are defined based on recommendations by supporting studies. As further supporting studies are developed and challenges are resolved, OPDC will provide guidance for general heights of tall buildings in future versions of the Local Plan and in forthcoming Supplementary Planning Documents.

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APPENDIX

Tall building precedents and OPDC supporting studies information

The following high density precedent schemes from within London and OPDC permitted schemes have been reviewed to inform the definition of a tall building within the OPDC area.

London precedents			
Scheme	**Location**	**Summary of heights**	**Relevance to OPDC area**
The Plimsoll Building	Kings Cross, LB Camden, London	• Average shoulder and/or podium height of 10-13 storeys.	Residential-led mixed use development located adjacent to excellent public transport services. Located within Kings Cross – St Pancras Opportunity Area.
Aldgate Place	LB Tower Hamlets, London	• Average shoulder and/or podium height of 10 storeys.	Residential-led mixed use development located adjacent to excellent public transport services. Located within City Fringe / Tech City Opportunity Area.
Micawber Street	Hoxton, LB Hackney, London	• Average shoulder and/or podium height of 7 storeys.	Residential-led development adjacent to good public transport services within a mixed density context. Located within City Fringe / Tech City Opportunity Area.
St. Andrews	Bromley-by-Bow, LB Tower Hamlets, London	• Average shoulder and/or podium height of 9 storeys.	Residential-led development adjacent to good public transport services located away from sensitive locations. Located within Lower Lea Valley Opportunity Area.
Adelaide Wharf	Haggerston, LB Hackney, London	• Average shoulder and/or podium height of 6 storeys.	Residential development adjacent to the Regents Canal. Located within City Fringe / Tech City Opportunity Area.
Barking Town Centre	LB Barking and Dagenham, London	• Average shoulder and/or podium height of 9 storeys.	Residential-led mixed use development within easy walking distance of public transport services. Adjacent to sensitive and low density residential areas.

			Located within London Riverside Opportunity Area.

OPDC permitted schemes precedents	
Scheme	**Summary of heights**
First Central	• Shoulder and/or podium height of 9 to 10 storeys.
Mitre Yard	• Shoulder and/or podium height of 7 to 10 storeys.
Oaklands	• Shoulder and/or podium height of 10 to 12 storeys.
North Kensington Gate (north)	• Shoulder and/or podium height of 4 storeys.
North Kensington Gate (south)	• Shoulder and/or podium height of 6 to 8 storeys

OPDC Local Plan supporting studies recommendations

The following OPDC Local Plan supporting studies provide recommendations for shoulder and/or podium building heights. These have been used to inform the definition and locations of a tall building within the OPDC area.

Supporting study	Summary of building heights recommendations
Old Oak North Development Framework Principles	• Average shoulder and/or podium height of 8 to 12 storeys above ground level with tall buildings above 15 storeys. • 6 to 8 storeys fronting on to Grand Union Canal. • Tall buildings are appropriate at locations of activity.
Park Royal Development Framework Principles	• Average shoulder and/or podium height of 6 to 8 storeys. • A tall building is appropriate within Park Royal Centre on the north east corner of the ASDA site.
Scrubs Lane Development Framework Principles	• Average shoulder and/or podium height of 6 to 10 storeys. • Lower heights adjacent to Cumberland Park Factory Conservation Area. • 6 to 8 storeys fronting on to Grand Union Canal. • A single tall building is appropriate within each of the four clusters.
Victoria Road and Old Oak Lane Development Framework Principles	• Average shoulder and/or podium height of 8 to 12 storeys. • Lower heights adjacent to sensitive locations. • Tall buildings are appropriate across North Acton and in locations along Old Oak Street within Acton Wells.