



St Quintin and Woodlands Neighbourhood Forum

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REPRESENTATION ON APPLICATION 2020/00300/FUL 227 WOOD LANE AND BROWNING HOUSE, W12 ST QUINTIN AND WOODLANDS NEIGHBOURHOOD FORUM

We wish to object to this application. While we appreciate that the published deadline for representations has passed we understand that the application has yet to be determined and that LBHF as the planning authority is required to take representations into account up until the date of decision. We note that certain essential documentation (the Fire Strategy for the proposed building) was made available only on 9th April.

The St Quintin and Woodlands Neighbourhood Forum covers an area of North Kensington designated by RB Kensington and Chelsea in 2013. The Forum has a membership of 420 local residents and businesses. The StQW Neighbourhood Plan was adopted by RBKC in 2018 and forms part of the development plan for the Royal Borough.

These representations take account of the 2020 New London Architecture Tall Buildings Survey, the recently published Historic England consultation draft Advice Note 4 on Tall Buildings, latest MHCLG statements on fire safety requirements in tall buildings, and the current position on the Draft London Plan.

We note that LBHF is one of a small number of London planning authorities which does not publish online the representations submitted on planning applications, whether these are for minor or major developments. We have identified only four other London Planning authorities out of 35 (including the OPDC and LLDC) which continue with this practice in an era when full online planning registers have become the norm. In our view this non-transparent approach to the handling of planning applications diminishes local accountability and public understanding of, and confidence, in the workings of the planning system.

We ask the Council to refuse the application on the grounds as set out below:

Contrary to the Brough's Spatial Vision

We cannot see how the proposals meet the policy requirements of the 2018 LBHF Local Plan. The 2035 Spatial Vision for the Borough as set out in the 2018 Local Plan is ambitious and reflects the fact that LBHF is well positioned within London's economy. The vision for 2035 states ***New development will have created a high quality accessible, safe and inclusive environment that respects and enhances local context and the borough's natural and built and historic environment.***

The wording of Strategic Objective 10 in the Plan reflects the ambition. Approval to a proposed residential tower of 29 storeys at Wood Lane will in our view add to the mistake that the Council made in granting consent to the 35 storey tower on the Imperial campus, and to the mistakes that have been made by the OPDC in granting consent to a series of tower buildings along Scrubs Lane (Mitre Yard, North Kensington Gate North and South, 2 Scrubs Lane).

In our view, these buildings will not prove to be environmentally sustainable over future decades. Nor will they provide living accommodation of a kind that meets the needs and aspirations of Londoners in a post Covid era. The schemes granted consent in Scrubs Lane, back in 2017 and 2018, have yet to start on site. Financial viability of the original proposals has already become negative, resulting in applications to vary the existing consents via S96A and S73 applications for 'optimisation' through additional housing units (and additional building heights). Given the impact of the current pandemic on London's property and investment market we think it unlikely that construction on these sites will start anytime soon. In the longer term we believe that public appetite for high density living in tall buildings with minimal space standards will reduce permanently following the period of 'lockdown living' experienced by many Londoners.

When New London Architecture began publishing its annual survey of tall buildings in London, the north-west quartile of the city barely featured. The Imperial tower was the first building of more than 10-12 storeys in the surrounding area, since followed by the further residential towers north of Westfield in the White City Opportunity Area.

Mainly as a result of decisions delegated by the OPDC to LB Ealing, a new cluster of very tall towers (up to 55 storeys) is emerging at North Acton, damaging forever the previously unobstructed skyline of West London. The 2020 NLA study notes *Compared with last year, the total number of tall buildings in the pipeline increased in the West (+8), North (+9) and Central (+9) sub-regions, with a drop in the East (-24) and the South (-11)*. Following the 1968 Ronan Point disaster, construction of tall buildings in London virtually ceased for two decades. Until the Imperial tower, this part of west London had remained very largely free of very tall buildings.

The creation of a new cluster in Wood Lane may well happen at a time when this form of development once again ceases to attract investors. As noted by housing and property expert Yolanda Barnes in a recent NLA webinar, tall building reliant on lifts and social distancing requirements do not combine well together and some form of the latter looks like being with us for a long time to come. RB Kensington and Chelsea planning policies continue to resist tall buildings. LBHF may come to regret that it chose not to take a similarly robust stance, in a period when this type of built form becomes increasingly unsustainable, expensive to maintain, and fails to attract renters or buyers.

The image of the 'emerging' townscape context for this site, as illustrated at 2.7. of the Design and Access Statement from Allford Hall Monaghan Morris and showing an extensive series of tall buildings on the southern landholding of Imperial College, involves brave assumptions as to what will ultimately be developed in this part of Wood Lane over the 2020-30 period.

Contrary to the Development Plan

As acknowledged in the Planning Statement from Gerald Eve, the site at 227 Wood Lane Site *is located directly adjacent to but not within the White City Opportunity Area and Regeneration Area* (paragraph 3.8). The Regeneration Area Strategies in the LBHF Local Plan, including those for the White City Opportunity Area, therefore do not apply to the site unless the Council chooses to vary the boundaries of its own planning designations. **If these are to be varied in this case, what confidence can the public have that these boundaries will be respected in future?**

Strategic Policy WCRA for the White City Regeneration Area *'aims to ensure that new development recognises the substantial scope offered by the scale and location of the White City Regeneration Area to create a new sense of place and range of densities. There may be scope for tall buildings, however any tall buildings would need to be justified by a full urban design analysis'*.

Firstly, the site does not lie within the WCRA boundary so this statement on the possible scope for tall buildings should not be applied to this application. Secondly, how are the public to assess whether a *'full urban design analysis'* (as also required by London Plan policy 7.7) has been independently and adequately undertaken?

Unlike RB Kensington and Chelsea, LBHF does not appear to make available copies of pre-application advice provided on development proposals, once applications are submitted. No report on this application from the LBHF Design Review Panel is available on the LBHF online planning file (again unlike the practice in RBKC and other London Boroughs).

Architects Allford Hall Monaghan Morris provide their own Tall Building Planning Policy Assessment based on the criteria in emerging London Plan policy D9. But as noted below, the new London Plan remains some way from final publication.

Paragraph 5.23 of the WCRA section of the LBHF 2018 Local Plan states *'Development should respect the prevailing scale of the surrounding townscape along its edges, and be generally medium rise. However, parts of the area such as alongside the A40 and A3220 may be less sensitive to the impact of building height due to large pieces of road and rail infrastructure that act to separate potential taller elements from nearby lower-rise residential areas. Some other limited locations within the regeneration area may also be acceptable for tall buildings, as long as it can be demonstrated that they are of the highest quality of architectural design, and they enhance and do not have a negative impact on the character and setting of Listed Buildings, Conservation Areas and the local area in general. This will also be subject to consideration of other design and amenity policies as set out within the Borough-Wide policies within this Local Plan. Where appropriate, the draft St Quintin and Woodlands Neighbourhood Plan will also be considered.*

We do not see that the application complies with this approach. Please see below under 'Design and Conservation issues' for our views on the impact of this scheme on the St Quintin/Oxford Gardens Conservation Area in RBKC, and relevant policy in the StQW Neighbourhood Plan.

The application needs to be assessed against the Borough-wide policy on Tall Buildings in the LBHF Local Plan, and relevant policies in the London Plan. We argue that LBHF Policy WCRA should be given very limited weight in determining the application given that the site lies outside the WCRA boundary.

LBHF Tall Building policy DC3 and London Plan policies

The Local Plan borough-wide policy on tall buildings (DC3) reads ***Tall buildings, which are significantly higher than the general prevailing height of the surrounding townscape and which have a disruptive and harmful impact on the skyline, will be resisted by the council. However, areas where tall buildings may be appropriate are as follows: (there follows a list of the Borough's 4 regeneration areas, including White City as referred to above).***

In terms of this policy, it is clear that the proposed 29 storey tower at 227 Wood Lane is *'significantly higher than the general prevailing height of the surrounding townscape'* with the sole exception of the Imperial tower on the opposite side of Wood Lane. The proposed building, as with the Imperial tower, will have a disruptive and harmful impact on the skyline as seen from streets in North Kensington including those in the St Quintin/Oxford Gardens Conservation Area, and should be resisted by LBHF in accordance with Policy DC3.

At paragraph 12.18 the Local Plan states *'The policy aims to ensure that tall buildings do not harm the built heritage and townscape character, but are properly located, contribute in a positive manner to enhance a sense of place and are an integral part of the long term spatial vision for the borough'*. We do not see that these criteria are met by this application.

Current London Plan Policy 7.7 on Tall Buildings is similar in form to that of the LBHF Local Plan, requiring that proposals are part of strategy and meet a set of defined criteria that are *particularly important if the site is not identified as a location for tall or large buildings in the borough's LDF*. We do not see that this application meets several of the criteria in 7.7.

The Draft New London Plan is referred to in detail in the Gerald Eve Planning Statement, on the basis that it should be given 'significant weight' on the assumption (made when the Planning Statement was prepared) of 'adoption in early 2020'. This assumption no longer holds, and in light of the response of the Secretary of State to the Draft New London Plan, coupled with the longer term impact of the COVID 19 crisis on development in London, there can be no certainty as to when new London Plan policies will be in force. Major changes to the London Plan may emerge as the city responds to the pandemic and the perceived benefits of agglomeration and high density office and residential buildings are called into question, for London and other global cities. In the meantime, the determination of this application must be in accordance with the policies in the 2016 London Plan and 2018 Borough Local Plan.

Design and Conservation Policy

LBHF Local Plan policy is set out in Policy DC2. Inter alia this requires new development to respect

- a. the historical context and townscape setting of the site, and its sense of place;***
- b. the scale, mass, form and grain of surrounding development and connections to it;***
- c. the relationship of the proposed development to the existing townscape, including the local street pattern, local landmarks and the skyline;***
- d. the local design context, including the prevailing rhythm and articulation of frontages, local building materials and colour, and locally distinctive architectural detailing, and thereby promote and reinforce local distinctiveness;***
- e. good neighbourliness and the principles of residential amenity;***

We do not consider the proposals to meet these requirements of LBHF Policy DC2. The Imperial College buildings (designed by several different architectural firms) are already seen by many local people as an architecturally weak and discordant set of buildings as compared with e.g. new university buildings in central Oxford, and as a development unworthy of Imperial's global reputation. A location where Westway crosses above Wood Lane is inevitably a challenging site for 'exemplary' architecture, but in this instance we share the view of the Hammersmith Society that the present proposals for 227 Wood Lane will not improve matters.

As with the original concept of the Imperial development forming a 'gateway' to West London with two towers on each side of the Westway, AHMM promotes this latest scheme as a 'gateway' to the White City Opportunity Area (paragraph 3.2 of D&A Statement). To the north on Scrubs Lane, this tired and overused ploy by developers has already been applied to the North Kensington Gate and Mitre Yard towers granted consent by OPDC in 2017. Why are 'gateways' needed in what has long been a low rise predominantly residential part of London, other than as a simplistic excuse for tall buildings and overdevelopment?

In terms of 'good neighbourliness and the principles of residential amenity' we have noted and support the detailed objections submitted by the DuCane Estate Residents Association.

Paragraph 3.9 of the Planning Statement from Gerard Eve states

3.9 The site is not located within a Conservation Area, nor are any of the buildings listed (either statutory or local listings). The closest listed building is the Burlington Danes School (Grade II) which is approximately 0.5 miles from the site.

The site at 227 Wood Lane in fact lies some 200m across the borough boundary and railway line from the edge of the Oxford Gardens/St Quintin Conservation Area. No mention of this nearby CA is made in the Gerard Eve Planning Statement. This same deficiency applies to the section on heritage and conservation in the AHMM Design and Access Statement. As has proved the case with the Imperial buildings, views westward from the Oxford Gardens/St Quintin Conservation Area will be further seriously compromised by a 29 storey tower that will be seen from most vantage points within this CA.

Policy E2) in the StQW Neighbourhood Plan (which form part of the development plan for RBKC) reads ***Where development has adverse impacts on views and vistas within and from the StQW neighbourhood, to resist proposals which cause harm to, or fail to preserve or enhance, the character of the StQW part of the Oxford Gardens Conservation area.*** We trust that LBHF will meet the commitment in its own Local Plan to take account of StQW policies where appropriate (para 5.23 of Local Plan).

As noted in the new draft of Historic England's Advice Note 4 on Tall Buildings 1.3 *One of the principal failings in the location and design of certain tall buildings has been a lack of understanding of the nature of the area around them, and the impact they would have on heritage assets and historic character of places: the very things that make places distinctive and that people cherish. There have been many examples of tall buildings that have had a lasting adverse impact due to their unsuitable locations, poor design, construction and management.*

Paragraph 3.1. of the same document states *In a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications. It is therefore important that the appropriate scale and form of development is assessed as part of the formulation of policies in the development plan.*

In our view, this application at 227 Wood Lane has not been 'plan led'. The site is not within the 'plan-led' area designated for regeneration at White City. The application is the product of recent market perspectives that co-living can follow on from student housing as a profitable form of PRS investment.

Transport implications

The Healthy Streets Transport Assessment (TA) submitted with the application has been prepared by Ardent Consulting Engineers. The report assumes that the majority of co-living occupants of the scheme will be within the age range 21-35, a view which we share.

However the study fails to recognise that this demographic are major users of London's cab apps (Uber pending its against the Mayor, Bolt, Kapten) as well as meal delivery services (Uber Eats, Just Eat). Pick up/drop off arrangements for 227 Wood Lane are not made clear. On deliveries, the study states that *Due to existing loading restrictions on Wood Lane deliveries will only be undertaken on Wood Lane before 0700 hours, between the hours of 1000 and 1600 hours, and after 2000 hours. Outside of these hours, deliveries will be required to be undertaken from Pioneer Way.* This would require delivery drivers to detour onto Du Cane Road, rather than park illegally or on the pavement outside the building at 227 Wood Lane. Evidence from daily reality in London suggests the latter is what will happen in practice, all too often.

In terms of vehicle trip generation the Arden study states *In addition, **Table 6.6** shows an increase of 143 daily two-way vehicle movements which roughly equates to an average of approximately 12 vehicles every hour (across a 12-hour period). Therefore, it is considered that no further assessment should be required as the proposals would not have any adverse impact on the existing operation in the surrounding area.*

Our Forum members in North Kensington have become all too familiar with similar assurances of 'marginal' or no adverse impact provided by transport consultants supporting the applications for the series of developments along Wood Lane that have come forward in the past decade (Imperial, White City Living, BBC/Stanhope, White City Place).

The reality on the ground remains that Wood Lane/Scrubs Lane experiences severe traffic congestion. North Pole Road provides the only exit westward from Kensington between the Harrow Road and Holland Park Avenue and sees long tailbacks and 15 minute queues for buses and cars most weekday afternoons and early evenings. The OPDC Draft Local Plan offers no solutions in terms of a rethink of the local road network.

The impact of the reduced roadwidth consequent on the TFL proposals for a dedicated cycleway along Wood Lane is as yet unknown, but this scheme is now supported by both LBHF and TfL and looks likely to happen.

The nearly completed east-west cycle superhighway along the A40 will also impact on cycle movements in the area. The planned cycle/pedestrian underpass between Wood Lane and Latimer Road (a S106 commitment by Imperial College dating from 2013) has yet to be given the final go ahead from the College and would provide valuable movement options for the occupants of a development at 227 Wood Lane. It is not mentioned in the Ardent transport study. Overall this study and its findings do not command confidence amongst local people in the area.

Co-living element of the proposed scheme

Co-living schemes in London to date are proving to be a form of 'upgraded student housing for young professionals'. The LBHF recognises the drawbacks of areas which become dominated by student housing. Where such accommodation is concentrated at a location (as has happened at North Acton) the

the resultant demographic becomes distorted and leads to an uneven availability of shops, restaurants/cafes and other amenities. Those living in co-living schemes are by nature a transient population, needing housing at what is often a brief period of life.

The four Gradpad buildings on the Imperial White City site already provide 606 self-contained units for graduate students (available to those from any higher education institution in London). We think it likely that the majority of those renting co-living apartments at 227 Wood Lane will be of a similar age range and with a similar way of life in terms of use of transport and local amenities. The Council needs to consider the application at 227 Wood Lane in this context, recognising that this is not a standard 'residential' development.

We have read the Co-Living Management Plan as provided by HUB, and recognise their efforts to think through this still relatively new model of housing. We are very familiar with the Collective at Old Oak (which is the first large co-living building in London and which offers free space for community meetings). This scheme seems to work well and has proved popular, but it should not be assumed that its imitators will all achieve 'exemplary' co-living accommodation' as claimed by HUB. The mix of facilities, ambience, and pricing that are involved in such schemes are a challenge to get right first time.

Fire Safety

Building Safety and Fire Safety is in state of flux at national level, with announcements in January 2020 of a new regulatory regime from 'a Government committed to delivering the biggest change in building safety for a generation' (MHCLG press release).

We have reviewed the Outline Fire Strategy submitted in April in support of the application. This is based on treating the building as 'residential' throughout, rather than as a mix of Womens Pioneer flats and co-living units. We consider this to be inappropriate in terms of the risk category of future co-living occupants. Many will be on short-term tenancies, and not all occupants will develop familiarity with means of escape and fire safety measures.

The Outline Fire Strategy provided by consultants OFR does not appear to make any allowance for this type of occupancy. It also notes that *The building has two blocks that do not communicate, each served by a single stair. This essentially makes the two portions of the building independent from each other. Escape through a single stair is permitted under the guidance of BS 9991 for the following reasons:*

- Residential units have a defend-in-place strategy;
- It has been proposed to have a mechanical and natural smoke clearance systems in the common corridors to protect the stairs;
- Residential buildings have a high level of compartmentation with each flat forming its own compartment.

The membership of our Forum live within half a mile of the Grenfell Tower. While single staircase residential towers may remain permitted at this time, we do not believe that this situation that will remain in place following the current review of the regulatory regime. While a planning application needs to be determined largely against planning and regulatory policies currently in force, we consider that LBHF should assess this aspect of the application very carefully, taking account the nature of the proposed occupancy.

The Collective at Old Oak is a co-living scheme housing a similar number of people to the co-living element proposed at 227 Wood Lane. But it is a 9 storey building where a fire can be fought externally from the ground, and not a 29 storey tower with a single stairwell.

For all the above reasons, we ask the Council to refuse this application in its current form. We agree with and support the comments submitted by the Hammersmith Society as well as by the Ducane Estate RA.

Henry Peterson
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