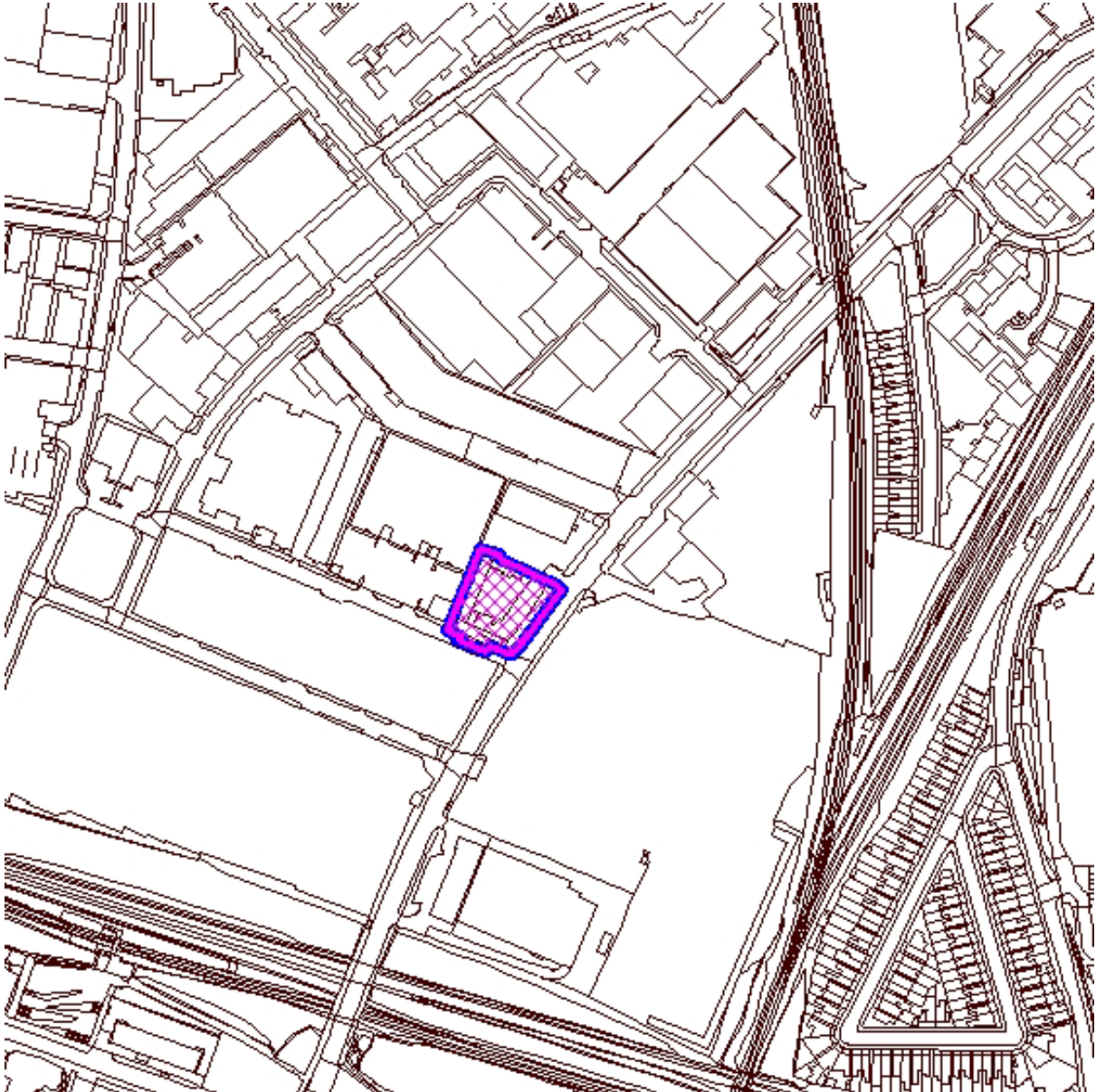


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**Ward:** Outside Borough Boundary

**Site Address:**

3 School Road, London, NW10 6TD



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**For identification purposes only - do not scale.**

**Reg. No:**

2023/00747/OPDOBS

**Case Officer:**

Violet Dixon

**Date valid:**

21.03.2023

**Conservation Area:**

N/A

**Recommendation Date:**

06.04.2023

**Committee Date:**

05.09.2023

**Applicant:**

Claire O'Brien (OPDC)

Brent Civic Centre, 32 Engineers Way, Wembley, HA9 0FJ

**Description:**

Demolition of existing buildings and redevelopment in the form of a building up to 25-storeys, comprising 1,199sqm (GIA) flexible Class E(g)(ii) (research and development of products or processes) / Class E(g)(iii) (industrial processes) / Class B2 (general industrial) uses over basement, ground and mezzanine floors; 95sqm (GIA) Class E(b) (cafe) use on ground floor; with 176 residential units (Class C3) above, together with access, service bay, internal and external residential amenity, landscaping and public realm, play space, cycle parking, refuse, plant and all associated works.

Drg. Nos: OPDC Consultation letter dated 16 March 2023 (OPDC Ref.23/0026/FUMOPDC).

**Application type:**

Observations to OPDC

**Officer Recommendation:**

The Council raises an objection to the proposed development for the following reason:

- 1) Townscape Impacts: The proposed development is considered to represent harm to the townscape of Hammersmith and Fulham, namely key views within Wormwood Scrubs. This townscape harm would result in a medium/high degree of change within key views and result in moderate/adverse townscape impacts.

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**LOCAL GOVERNMENT ACT 2000  
LIST OF BACKGROUND PAPERS**

**All Background Papers held by case officer named above:**

Application form received: 20 March 2023

**Policy Documents:** National Planning Policy Framework (NPPF) 2021

The London Plan 2021

LBHF - Local Plan 2018

LBHF - Planning Guidance Supplementary Planning Document  
2018

**Neighbour Comments:**

None Received

## Officer Report

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### 1. BACKGROUND

- 1.1. The Old Oak & Park Royal Development Corporation (OPDC) has consulted the Council on a planning application submitted to them (their reference 23/0026/FUMOPDC) for the redevelopment of 3 School Road, NW10. The site is situated in LB Ealing, but the OPDC is the determining planning authority.
- 1.2. This application is being reported to the Planning and Development Control Committee to give Members the opportunity to consider and endorse the officers' recommendations before these are formally submitted to the OPDC. It is for the OPDC to determine the planning application, but the Council's representations will be included in their committee report and will form part of their consideration of the proposals.
- 1.3. The OPDC are currently intending to report the planning application to their planning committee for determination on the 7 September 2023.

#### Site & Surroundings

- 1.4. The application site is broadly rectangular and situated at the junction of and School Road on the corner of Victoria Road, NW10. It measures approximately 0.38 hectares and currently comprises two buildings containing office and industrial floorspace. There are further industrial buildings immediate north and to the west of the site. A public park is being developed to the south of the site, and there is a car park to the east.
- 1.5. The site is allocated (36) for a mixed-use residential-led development in OPDC's recently adopted local plan (June 2022), together with 99 Victoria Road to the south. The plan identifies a capacity for 250 net additional housing units and 800 sqm. of commercial or industrial floorspace. The site has been released from its previous Strategic Industrial Location (SIL) designation under the OPDC local plan, as part of a wider approach to the consolidation and release of industrial land across the Old Oak and Park Royal Opportunity Area.
- 1.6. The site itself is not in a conservation area and it does not contain any other heritage assets. The Acton Business Centre further along School Road is a building of local heritage interest. The site is located approximately 200 metres north of North Acton Station Underground (LU) station which is served by Central Line services. There are 3 bus stops along Victoria Road in the immediate vicinity to the site. The site has a Public Transport Accessibility Level (PTAL) of 4, on a scale of 0 to 6b where 6b is the highest. A new station for HS2 is proposed 500 metres to the east of the site. As part of the delivery of HS2, the proposed relocation of the northbound bus stop on Victoria Road could be delivered directly outside the site. The HS2 Crossover Box is immediately south of the site and the Old Oak Masterplan Area extends east.

### 2.0 PLANNING HISTORY

- 2.1. There is no relevant planning history on the site, in the context of the current consultation request from the OPDC.

### **3. PROPOSAL**

- 3.1. Demolition of the 2 existing buildings on the site and redevelopment in the form of a predominantly residential tower up to 25-storeys in height, comprising 176 residential units (35% affordable) above 1,199sqm (GIA) of flexible Class E(g)(ii) (research and development of products or processes) / Class E(g)(iii) (industrial processes) / Class B2 (general industrial) uses over basement, ground and mezzanine floors; and 95sqm (GIA) Class E(b) (cafe) use on ground floor.

### **4.0 PUBLICITY & CONSULTATIONS**

- 4.1. The planning application has been submitted to OPDC who are the Local Planning Authority. In addition to the consultation responses from the relevant statutory bodies (including Ealing council) the OPDC have received an objection to the application from the Ealing Civic Society, on the grounds that residential development in this location is unsuitable (industrial area currently with a lack of local infrastructure and poor amenities to support a residential community) and the provision of residential accommodation above the proposed industrial uses would be likely to harm the amenities of future residents. No representations have been received from Hammersmith & Fulham residents.
- 4.2. Similarly, we have not received any representations from Hammersmith & Fulham residents regarding the proposed development.

### **5.0 PLANNING FRAMEWORK**

- 5.1. The Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011 are the principal statutory considerations for town planning in England. Collectively the three Acts create a plan led system which requires local planning authorities to determine planning applications in accordance with an adopted statutory development plan unless there are material considerations which indicate otherwise (section 38(6) of the 2004 Act as amended by the Localism Act).
- 5.2. For LBHF purposes the statutory development plan comprises the London Plan (2021), our adopted Local Plan (2018) and our related Planning Guidance SPD (2018). In this case the application site is in LB Ealing who have made their own representations direct to the OPDC on the proposals. The OPDC as the determining authority will assess the development against the London Plan and their own local plan (2022).
- 5.3. The National Planning Policy Framework - NPPF (2021) is a material consideration in planning decisions. The NPPF, as supported by the Planning Practice Guidance (PPG), sets out national planning policies and how these are expected to be applied. The NPPF does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up-to date Local Plan should be approved and proposed development that conflicts should be refused unless other material considerations indicate otherwise.

## 6.0 PLANNING CONSIDERATIONS

### URBAN DESIGN & HERITAGE

- 6.1. No objection raised to the proposal in terms of the design or architectural character of the scheme.
- 6.2. In terms of heritage impacts, the proposals are not considered to result in any harm to the setting of any heritage assets.
- 6.3. The main point of concern relates to the townscape impact of the proposed development from key views within Wormwood Scrubs. The application site is situated within an area considered appropriate for tall buildings, as defined by the OPDC Local Plan (2022).



Extract from OPDC Local Plan – Areas where tall buildings are appropriate in purple.  
(Application site denoted by orange circle).

- 6.4. The OPDC Local Plan defines a tall building as being above 15-storeys or 48 metres in height. At 25-storeys the proposal would represent a singular new tall building. However, given the wider designation for tall buildings, a new cluster of tall buildings are envisaged to developed in this area throughout the plan period.
- 6.5. The application has been accompanied by a Heritage Townscape and Visual Impact Appraisal (HTIVA) which highlights several key views within the surrounding context inclusive of a view from Wormwood scrubs situated within LBHF. The submitted views outline the significant change to the selected view from the scrubs when looking to the north. The HTVIA concludes that the magnitude of change within this view of medium sensitivity would be medium and would likely have a moderate/beneficial impact overall. Officers disagree with this assessment, given that the proposal scheme would introduce a highly prominent new feature within the background of views from Wormwood Scrubs which would be visually distracting and change the appreciation and experience of the scrubs as a key open space. Whilst the classification of the view as medium sensitivity is agreed, officers consider that the extent of change would be medium/high and the effect of this change to be moderate/adverse.

- 6.6. Furthermore, officers remain cognisant of the potential cluster of the tall buildings which could be delivered in future. The proposed height of this initial tall building requires careful consideration to help inform the scale of other tall buildings within the local area. Given that no other applications are pending consideration, or no masterplan has been formally adopted for the sites; officers are concerned that development to this scale at the edge of an area identified for the development tall buildings could create a precedent for other tall buildings to be of a much-increased scale which would further exacerbate townscape harm to the sensitive setting of Wormwood Scrubs. Similar concerns have been raised previously, in relation to the increased scale and densities of development coming forward around North Acton Station.
- 6.7. The proposals would therefore result in a medium/high degree of change within key views from Wormwood Scrubs and would result in moderate/adverse impacts upon these key townscape views. Officers would therefore raise objections to the proposal from a townscape perspective.

#### HIGHWAYS

- 6.8. Officers raise no objections to the proposals on highways grounds. The application site is in LB Ealing, and they are the local highways authority in this case.
- 6.9. The main issue for us is any likely impact of the proposed development on the road network in Hammersmith & Fulham and on our residents.
- 6.10. The development would be car permit free and the consultation responses sent direct to the OPDC from TfL and LB Ealing acknowledge this and state that the appropriate permit free measures should be secured within a s106 agreement, together with necessary travel plans and a delivery and servicing plan. Ealing have also asked for car club membership and a servicing and parking management plan.
- 6.11. Both Ealing and TfL have also asked for construction management and logistics plans. Given the proximity of the site to the borough boundary officers endorse these comments. Any construction logistics plan should consider the cumulative impact of construction traffic/activities in the area.

### **7.0. CONCLUSION**

- 7.1. Officers recommend that that the Council raises an objection to the proposed development on townscape impact grounds, as detailed above in the "Officer Recommendation" section at the front of this report.