

Planning and Development Control Committee

Agenda

Tuesday 2 April 2019

7.00 pm

Committee Room 1 - Hammersmith Town Hall

MEMBERSHIP

Administration:	Opposition
Councillor Rachel Leighton (Chair) Councillor Matt Uberoi (Vice-Chair) Councillor Colin Aherne Councillor Wesley Harcourt Councillor Natalia Perez Councillor Rowan Ree	Councillor Alex Karmel Councillor Matt Thorley

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Committee Co-ordinator
Governance and Scrutiny
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Public Notice

Members of the press and public are welcome to attend this and all other Council meetings. Should exempt information need to be discussed the committee will pass a resolution requiring members of the press and public to leave.

For details on how to register to speak at the meeting, please see overleaf.

Deadline to register to speak is 4pm on Thursday 28 March 2019

For queries concerning a specific application, please contact the relevant case officer.

The open part of this agenda is available for public inspection at the Town Hall and may be viewed on the Council's website www.lbhf.gov.uk/committees

A loop system for hearing impairment is provided, along with disabled access to the building.

Rights of access to meetings are subject to the provisions of the Local Government Act 1972 and the Local Government (Access to Information) Act 1985.

PUBLIC SPEAKING AT PLANNING AND DEVELOPMENT CONTROL COMMITTEE (PROTOCOL)

Members of the public are welcome to attend the Planning and Development Control Committee meeting.

Who can speak?

Only the applicant or their agent and people who have commented on the application as part of the planning department consultation process in support or against will be permitted to speak at the meeting. They must have been registered to speak before addressing the committee. Ward Councillors may sometimes wish to speak at meetings even though they are not part of the committee. They can represent the views of their constituents. The Chair will not normally allow comments to be made by other people attending the meeting or for substitutes to be made at the meeting.

Do I need to register to speak?

All speakers except Ward Councillor must register at least two working days before the meeting. For example, if the committee is on Wednesday, requests to speak must be made by 4pm on the preceding Friday. Requests received after this time will not be allowed. Registration will be by email only. Requests are to be sent to speakingatplanning@lbhf.gov.uk with your name, address and telephone number and the application you wish to speak to as well as the capacity in which you are attending.

How long is provided for speakers?

Those speaking in support or against an application will be allowed three minutes each. Where more than one person wishes to speak for or against an application, a total of five minutes will be allocated to those speaking for and those speaking against. The speakers will need to decide whether to appoint a spokesperson or split the time between them. The Chair will say when the speaking time is almost finished to allow time to round up. The speakers cannot question councillors, officers or other speakers and must limit their comments to planning related issues.

At the Meeting - please arrive 15 minutes before the meeting starts and make yourself known to the Committee Co-ordinator who will explain the procedure.

What materials can be presented to committee?

To enable speakers to best use the time allocated to them in presenting the key issues they want the committee to consider, no new materials or letters or computer presentations will be permitted to be presented to the committee.

What happens to my petition or deputation?

Written petitions made on a planning application are incorporated into the officer report to the Committee. Petitioners, as members of the public, are welcome to attend meetings but are not permitted to speak unless registered as a supporter or objector to an application. Deputation requests are not accepted on applications for planning permission.

Planning and Development Control Committee Agenda

2 April 2019

<u>Item</u>	<u>Pages</u>
1. MINUTES	5 - 19
<p>To approve as an accurate record, and the Chair to sign, the minutes of the meetings of the Committee held on 30 January 2019 and 12 February 2019.</p>	
2. APOLOGIES FOR ABSENCE	
3. DECLARATION OF INTERESTS	
<p>If a Councillor has a disclosable pecuniary interest in a particular item, whether or not it is entered in the Authority's register of interests, or any other significant interest which they consider should be declared in the public interest, they should declare the existence and, unless it is a sensitive interest as defined in the Member Code of Conduct, the nature of the interest at the commencement of the consideration of that item or as soon as it becomes apparent.</p> <p>At meetings where members of the public are allowed to be in attendance and speak, any Councillor with a disclosable pecuniary interest or other significant interest may also make representations, give evidence or answer questions about the matter. The Councillor must then withdraw immediately from the meeting before the matter is discussed and any vote taken.</p> <p>Where Members of the public are not allowed to be in attendance and speak, then the Councillor with a disclosable pecuniary interest should withdraw from the meeting whilst the matter is under consideration. Councillors who have declared other significant interests should also withdraw from the meeting if they consider their continued participation in the matter would not be reasonable in the circumstances and may give rise to a perception of a conflict of interest.</p> <p>Councillors are not obliged to withdraw from the meeting where a dispensation to that effect has been obtained from the Audit, Pensions and Standards Committee.</p>	
4. BROOK HOUSE, 229-243 SHEPHERD'S BUSH ROAD, LONDON W6 7AN - HAMMERSMITH BROADWAY 2018/02776/FUL	20 - 49
5. CENTRE HOUSE, 56 WOOD LANE, LONDON W12 7SB COLLEGE PARK AND OLD OAK 2018/03058/FUL	50 - 168

**London Borough of Hammersmith & Fulham
Planning and Development Control Committee
Minutes**



Wednesday 30 January 2019

PRESENT

Committee members: Councillors Matt Uberoi, Colin Aherne, Natalia Perez, Rowan Ree, Alex Karmel and Matt Thorley

Also Present: Councillors Rebecca Harvey, David Morton, Fiona Smith and Adam Connell

1. MINUTES

The minutes of the meeting of 11 December 2018 were agreed as an accurate record.

2. APOLOGIES FOR ABSENCE

Apologies for absence were provided by Councillor Rachel Leighton and Wesley Harcourt. Apologies for absence were also provided from Andrew Slaughter MP.

In the absence of Councillor Rachel Leighton, Vice Chair Councillor Uberoi chaired the meeting.

3. DECLARATION OF INTERESTS

There were no declarations of interest.

4. Olympia Exhibition Centre, Hammersmith Road, London W14 8UX 2019/03100/FUL, 2018/03101/LBC and 2018/03102/OUT

Please see the Addendum attached to the minutes which made minor changes to the report.

At the start of the meeting, the Vice-Chair explained that due to the high level of public interest in the application, he had used his discretion and rather than the 10-minute maximum (5 minutes for, 5 minutes against), he had decided to allow members of the public to address the committee for a total of 18 minutes. Based on the number of representations received, the Chair allocated 9 minutes to those in favour of the application and 9 minutes to those opposed to it.

Two planning applications and one listed building consent application for The Olympia Exhibition Centre were listed on the agenda. For ease of presentation, the Vice-Chair confirmed that one combined officer presentation would be provided to

Committee and following debate, three separate and distinct votes would be taken on applications: 2018/03100/FUL, 2018/03101/LBC and 2018/03102/OUT.

The Legal officer confirmed that the resolutions would (in addition to being conditional on no contrary direction being received from the Mayor of London) be conditional on no decision to call in the application being received from the Secretary of State. This is because the Secretary had received a request to call in the applications which it needed time to consider.

The Committee heard representations against the application from three residents. Councillor Adam Connell attended and spoke on behalf of the Sinclair Road Residents Association. A number of concerns were raised which included:

- The Proposed development was not in accordance with policy E1a and E1b and was not within an opportunity area or a town centre.
- The proposed development was a speculative gamble and skills could be updated elsewhere.
- The s106 benefits of the scheme were negligible.
- The proposal would result in a change of use and it was not located within a designated regeneration site.
- No additional transport infrastructure had been provided and the original proposal had envisaged the re-opening of the District Line.
- Olympia Central – was too high, bulky/sprawling.
- The proposed development would encroach on the listed building.
- The proposed development building was not served by public space at ground level.
- The scale, material and form of the proposed building were not appropriate for the site.
- The consultation phase with residents had been flawed.
- Residents had not been provided with proper information about what the proposal entailed.
- The artists impressions of the proposal were creative and did not provide a clear impression of the height, bulk and size of the proposal.
- The Sinclair Road Residents were not aware of the proposed office block with the context of the proposal.
- The Design Review Panel had expressed concerns about the proposal.
- The proposal would overload the transport network and result in more traffic and congestion on local streets.
- The proposal only incorporated 1,500 additional cycle spaces which was insufficient given the scale of the development.
- The proposal would result in increased noise and light pollution, as well as, have an adverse impact on air quality.
- The proposal would result in the closure of Olympia Way and there would be no easy access for residents.
- The cooling chimney was visible, prominent and out of character.
- The proposal did not incorporate sufficient green space.

The Committee heard representations in support of the application by the Applicant/Agent and two further residents. A number of points were raised and included:

- The consultation phase undertaken by the applicant had been extensive and should be commended.
- The proposal incorporated some very good ideas and would create some world class spaces.
- The proposal to open up the roof level was exciting and would help make Olympia a future cultural venue in London.
- Increased pedestrianisation of the site would be beneficial to residents.
- The proposal would result in the creation of thousands of new jobs and employment opportunities.
- The proposal would provide a significant s106 contribution.
- If the proposal was refused, the Olympia site might become mothballed and in future, possibly be developed into luxury flats or a further shopping centre.
- The proposal would provide a fantastic amenity and have positive economic and cultural impacts.
- The proposal would revitalise the area.
- The proposal would create spaces which all residents could enjoy.
- The proposal would result in the creation of a new retail space and there would be fresh opportunities for independent retailers.
- The proposal would result in the removal of freight traffic.
- The proposal would create an additional 5000 jobs locally.
- The proposal would create a world class destination.
- The proposal would result in improvements and enhancements to the quality of the surrounding townscape, including the Olympia and Avonmore Conservation Area.
- The proposal would create a business hub, a national and international cultural centre and a leisure hub.

The Committee heard a representation from Councillor Rebecca Harvey, Ward Councillor for Avonmore and Brook Green in objection to the proposal. The Committee also heard a representation from Councillor David Morton, Ward Councillor for Avonmore and Brook Green in support of the proposal.

During the course of discussions, the committee raised a number of points. These included:

- The heritage aspects of the application and whether the potential harm was outweighed by the benefits of the scheme.
- The Grade 2 listed carpark and the intended change of use.
- The number of hotel rooms within the proposal and if this had been limited by the Council.
- The transport implications and in particular bus usage – noting that a journey matrix would be provided by the applicant.
- TfL's stance and its opinion that no extra highway or District Line works were required.

- The number of persons employed within the site and balancing this with consideration of a possible over intensification of the use of the site.
- The potential to cause harm to surrounding conservation areas.
- The frequency of Tube trains per week to the site and whether there was adequate disabled access.
- Deliveries to the site and the likely impact these would have on residents.
- CS9 and the implications this might have on bus routes and route planning.
- The daylight, sunlight and overshadowing implications of the application.
- Employment opportunities for local residents arising from the proposal.
- The importance of liaison groups, consultation and ongoing engagement with local residents, should the application be approved.
- The importance that a robust consultation process is undertaken by a developer with local residents.
- The views of English Heritage, noting that in its view, the proposal caused less than substantial harm.
- Confirmation from officers that the owner of the site could not flip the use from B1 to C3 post approval.

The Committee voted on application 2018/03100/FUL and whether to agree the officer recommendations of approval and the changes set out in the addendum. This was put to the vote and the result was as follows:

Officer Recommendation 1:

For:
4
Against:
2
Not Voting:
0

Officer Recommendation 2:

For:
6
Against:
0
Not Voting:
0

RESOLVED THAT:

Planning Application 2018/03100/FUL be approved, subject to the addendum.

- 1) Subject to there being no contrary direction from the Mayor for London and no request for call in from the Secretary of State that the Committee resolve that the Strategic Director for Growth and Place be authorised to determine the application and grant permission upon the completion of a satisfactory legal agreement and subject to the conditions listed below;

Minutes are subject to confirmation at the next meeting as a correct record of the proceedings and any amendments arising will be recorded in the minutes of that subsequent meeting.

- 2) To authorise the Strategic Director for Growth and Place, in consultation with the Director of Law and the Chair of the Planning and Development Control Committee, to make any minor changes to the proposed conditions or heads of terms of the legal agreement. Any such changes shall be within their discretion.

The Committee voted on application 2018/03101/LBC and whether to agree the officer recommendations of approval and the changes set out in the addendum. This was put to the vote and the result was as follows:

Officer Recommendation 1:

For:

4

Against:

2

Not Voting:

0

Officer Recommendation 2:

For:

6

Against:

0

Not Voting:

0

RESOLVED THAT:

Planning Application 2018/03101/LBC be approved, subject to the addendum.

- 1) 1) Subject to there being no contrary direction from the Mayor for London and no request for call in from the Secretary of State that the Committee resolve that the Strategic Director for Growth and Place be authorised to determine the application and grant listed building consent subject to the conditions listed below
- 2) To authorise the Strategic Director for Growth and Place, in consultation with the Director of Law and the Chair of the Planning and Development Control Committee, to make any minor changes to the proposed conditions. Any such changes shall be within their discretion.

The Committee voted on application 2018/03102/OUT and whether to agree the officer recommendations of approval and the changes set out in the addendum. This was put to the vote and the result was as follows:

Officer Recommendation 1:

For:
4
Against:
2
Not Voting:
0

Officer Recommendation 2:

For:
6
Against:
0
Not Voting:
0

RESOLVED THAT:

Planning Application 2018/03102/OUT be approved, subject to the addendum.

- 1) Subject to there being no contrary direction from the Mayor for London or request for call in from the Secretary of State that the Committee resolve that the Strategic Director for Growth and Place be authorised to determine the application and grant permission upon the completion of a satisfactory legal agreement and subject to the conditions listed below;
- 2) To authorise the Strategic Director for Growth and Place, in consultation with the Director of Law and the Chair of the Planning and Development Control Committee, to make any minor changes to the proposed conditions or heads of terms of the legal agreement. Any such changes shall be within their discretion.

Meeting started: 7:00 pm
9:25pm

Chair

Contact officer: Charles Francis
Committee Co-ordinator
Governance and Scrutiny
Tel 020 8753 2062
E-mail: charles.francis@lbhf.gov.uk

Minutes are subject to confirmation at the next meeting as a correct record of the proceedings and any amendments arising will be recorded in the minutes of that subsequent meeting.

**London Borough of Hammersmith & Fulham
Planning and Development Control Committee
Minutes**



Tuesday 12 February 2019

PRESENT

Committee members: Councillors Rachel Leighton, Matt Uberoi, Colin Aherne, Wesley Harcourt, Natalia Perez, Rowan Ree, Alex Karmel and Matt Thorley

Also Present: Councillor Stephen Cowan

1. APOLOGIES FOR ABSENCE

There were no apologies for absence.

2. DECLARATION OF INTERESTS

Councillor Wesley Harcourt declared a non-pecuniary interest in respect of - Next to Londis, Plimley Place - as he was the Cabinet Member for Environment with responsibility for the site. He remained in the meeting and voted on the item.

Councillor Wesley Harcourt declared a non-pecuniary interest in respect of Footpath Wood Lane, Junction with South Africa Road next to refurbished Garage - as he was the Cabinet Member for Environment with responsibility for the site. He remained in the meeting and voted on the item.

3. DECISION TO RE-ORDER THE AGENDA

In view of members of the public present for particular applications the Chair proposed that the agenda be re-ordered, with which the Committee agreed, and the minutes reflect the order of the meeting.

4i. Hammersmith Town Hall, King Street, London W6 9JU – 2018/01500/FUL and 2018/01501/LBC

Please see the Addendum attached to the minutes which made minor changes to the report.

One planning application and one listed building consent application for the Hammersmith Town Hall were listed on the agenda. For ease of presentation, the Chair confirmed that one combined officer presentation would be provided to Committee and following debate, two separate and distinct votes would be taken on applications: 2018/01500/FUL and 2018/01501/LBC.

The Committee heard three representations in support of the application from: the Chair of Hammersmith and Fulham Disability Forum Planning Group, speaking on behalf of the Disabled Residents Team, the Town Hall Commission and the Applicant. A number of points were raised and included:

- The proposal had been developed in co-production with disabled residents and would provide a high quality environment for disabled and impaired members of the community.
- The Disabled Residents Team had worked with the Access consultants to ensure the proposal was a building everyone could use and enjoy.
- The proposal would provide a safe and secure environment for all users.
- The proposal would result in the provision of an inclusive environment, providing 10% of all units as wheelchair units with strong lift access to all upper levels within the development.
- The West King Street Renewal would provide a civic and residential mixed-use redevelopment of the site.
- The proposal would contribute to the local and wider London economy.
- The proposal would help to regenerate the wider Hammersmith Town Centre Regeneration Area whilst delivering a quantum of affordable housing, in excess of the policy requirement of 50%.
- The proposal had incorporated widespread public consultation and public involvement, including public meetings, amenity groups and local residents.
- The Town Hall extension had blighted King Street and the new design concept delivered a proposal of high architectural quality and high quality public realm. This would enhance and preserve the character and appearance of the conservation area and listed building.
- The applicant had worked in partnership with Historic England to achieve an acceptable design.
- The proposed development would deliver 204 dwelling units (Class C3), retail (Class A), restaurant/café (Class A3), cinema (Class D2) and Office space (Class B1), as well as enterprise units.

The Chair highlighted that one late objection had been received by email. These comments had been received and understood and related mainly to design matters.

During the course of discussions, the committee raised a number of points. These included:

- The committee commended the community engagement and working with residents which had been undertaken during the development of the proposal.
- The removal of the Town Hall extension and the improvements this would bring to King Street and the local area.
- The scale / design of the Brie solei and the impact on wind noise.
- The effects of the proposal on the micro-climate.
- The overall accessibility of the proposal and the number of lifts which had been incorporated into the design.
- The appearance of Block C, its visual amenity and the outlook implications of the design.

- The incorporation of affordable housing in excess of the London Plan requirements.
- The proposed new cinema and its revenue generation potential.
- The proposed hours of operation of the site. In particular, the need for these to take account of the Town Hall operations during election counts.
- The removal of trees in Nigel Play Fair Avenue and the need to ensure suitable species were selected as part of the landscaping condition/s.
- The air quality of the residential units (Block D, near the A4) and the need to ensure a reliable air management design was selected.
- The sunlight and daylight implications of the design.
- Night time lighting and security considerations.

In the course of the above discussions, Councillor Alex Karmel proposed that a maximum permitted wind noise stemming from the brie solei be imposed. This proposal was seconded by Councillor Matt Thorley.

Councillor Wesley Harcourt proposed that the condition related to the hours of use be amended to reflect various civic events, as well as the need for extended hours of operation during election periods. This proposal was seconded by Councillor Alex Karmel.

The Committee voted on application 2018/01500/FUL and whether to agree the officer recommendations set out in the report, addendum and the following changes: the motion to include a maximum permitted wind noise from the brie solei and amending the hours of use condition to reflect civic events and election periods. This was put to the vote and the result was as follows:

Officer Recommendation 1:

For:
8
Against:
0
Not Voting:
0

Officer Recommendation 2:

For:
8
Against:
0
Not Voting:
0

RESOLVED THAT:

Planning Application 2018/01500/FUL be approved, subject to the addendum and changes set out above.

- 1) Subject to there being no contrary direction from the Mayor for London that the Committee resolve that the Strategic Director for Growth and Place be authorised to determine the application and grant permission upon the completion of a satisfactory legal agreement and subject to the conditions listed below;
- 2) To authorise the Strategic Director for Growth and Place, in consultation with the Director of Law and the Chair of the Planning and Development Control Committee, to make any minor changes to the proposed conditions or heads of terms of the legal agreement. Any such changes shall be within their discretion.

The Committee voted on application 2018/01501/LBC and whether to agree the officer recommendations of approval and the changes set out in the addendum. This was put to the vote and the result was as follows:

Officer Recommendation 1:

For:
8
Against:
0
Not Voting:
0

Officer Recommendation 2:

For:
8
Against:
0
Not Voting:
0

RESOLVED THAT:

Planning Application 2018/01501/LBC be approved, subject to the addendum.

- 1) Subject to there being no contrary direction from the Mayor for London that the Committee resolve that the Strategic Director for Growth and Place be authorised to determine the application and grant permission upon the completion of a satisfactory legal agreement and subject to the conditions listed below;
- 2) To authorise the Strategic Director for Growth and Place, in consultation with the Director of Law and the Chair of the Planning and Development Control Committee, to make any minor changes to the proposed conditions or heads of terms of the legal agreement. Any such changes shall be within their discretion.

8 King's Quay, Thames Avenue Chelsea Harbour, London

Please see the Addendum attached to the minutes which amended the report.

The Committee heard a representation in objection to the application from a local resident. Some of the points raised included: The proposal would adversely impact on the neighbouring amenity and the character of the roof line within the Chelsea Harbour Development. Further points included: the proposal would result in a loss of privacy and overlooking.

The Committee heard a representation in support of the application from a representative of the Applicant. Some of the points raised included: In 2018, planning permission was refused (2018/02688/FUL) for the erection of a roof extension with dormer window openings fronting northern, eastern and southern elevations, on the grounds of overlooking and loss of privacy to No.48 Thames Quay. The new proposal would overcome these grounds as the south facing window would be obscured to prevent overlooking. Further points included: the proposal complied with BRE guidance in relation to daylight and sunlight, the overall height of the proposal would not change, the proposal was not sited in a conservation area and would improve the quality of the residential unit, providing family sized accommodation.

During the course of discussions, the Committee explored a number of issues including the design principles and whether the design was in character with the area, as well as whether there might be added light pollution.

The Committee voted on application 2018/03508/FUL and whether to agree the officer recommendations of approval, and the changes set out in the addendum. This was put to the vote and the result was as follows:

Officer Recommendation 1:

For:

5

Against:

3

Not Voting:

0

Officer Recommendation 2:

For:

8

Against:

0

Not Voting:

0

RESOLVED THAT:

Planning Application 2018/03508/FUL be approved, subject to the addendum.

- 1) That the Committee resolve that the Strategic Director, Growth and Place be authorised to determine the application and grant permission up on the completion of a satisfactory legal agreement and subject to the condition(s) listed below.
- 2) To authorise the Strategic Director, Growth and Place, after consultation with the Director of Law and the Chair of the Planning and Development Control Committee to make any minor changes to the proposed conditions or heads of terms of the legal agreement, any such changes shall be within their discretion.

The Queens Club, Palliser Road, London

Please see the Addendum attached to the minutes which amended the report.

At the start of the item, the applicant agreed to waive their right to address the committee.

During the course of discussions, the Committee explored a number of issues including the retention of a memorial plaque, the likely impact of the loss of the stand and the economic benefits to the local community should the application be approved.

The Committee voted on application 2018/03263/FUL and whether to agree the officer recommendations of approval, and the changes set out in the addendum. This was put to the vote and the result was as follows:

For:
8
Against:
0
Not Voting:
0

RESOLVED THAT:

Planning Application 2018/03263/FUL be approved, subject to completion of a satisfactory legal agreement to the addendum.

284 – 288 North End Road, London

Please see the Addendum attached to the minutes which amended the report.

During the course of discussions, the Committee explored a number of issues including the merits of basement accommodation, the loss of the 3 existing residential units and highways issues which would be mitigated via a travel plan

and demolition/ construction logistics plan . Further issues included, the accuracy of the PTAL rating, impact on f local public transport, , privacy / overlooking, the carbon emissions payment in lieu and the site location within a regeneration area.

The Committee voted on application 2017/04216/FUL and whether to agree the officer recommendations of approval and the changes set out in the addendum. This was put to the vote and the result was as follows:

Officer Recommendation 1:

For:

5

Against:

3

Not Voting:

0

Officer Recommendation 2:

For:

8

Against:

0

Not Voting:

0

RESOLVED THAT:

Planning Application 2017/04216/FUL be approved, subject to the addendum.

- 1) That the Committee resolve that the Strategic Director, Growth and Place be authorised to determine the application and grant permission up on the completion of a satisfactory legal agreement and subject to the condition(s) listed below.
- 2) To authorise the Strategic Director, Growth and Place, after consultation with the Director of Law and the Chair of the Planning and Development Control Committee to make any minor changes to the proposed conditions or heads of terms of the legal agreement, any such changes shall be within their discretion.

Next to Londis, Plimley Place, London

Please see the Addendum attached to the minutes which amended the report.

Councillor Wesley Harcourt declared a non-pecuniary interest in respect of - Next to Londis, Plimley Place as he was the Cabinet Member for Environment with responsibility for the site. He remained in the meeting and voted on the item

The Committee voted on application 2018/03343/FR3 and whether to agree the officer recommendations set out in the report and changes set out in the addendum. This was put to the vote and the result was as follows:

For:

8

Against:

0

Not Voting:

0

RESOLVED THAT:

Planning Application 2018/03343/FR3 be approved for the reasons set out in the report and addendum.

Footpath Wood Lane, Junction with South Africa Road next to Refurbished Garage

Please see the Addendum attached to the minutes which amended the report.

Councillor Wesley Harcourt declared a non-pecuniary interest in respect of Footpath Wood Lane, Junction with South Africa Road next to refurbished Garage as he was the Cabinet Member for Environment with responsibility for the site. He remained in the meeting and voted on the item.

The Committee voted on application 2018/03483/FR3 and whether to agree the officer recommendations set out in the report and changes set out in the addendum. This was put to the vote and the result was as follows:

For:

8

Against:

0

Not Voting:

0

RESOLVED THAT:

Planning Application 2018/03483/FR3 be approved for the reasons set out in the report and addendum.

Meeting started: 7:00 pm
9:55 pm

Chair

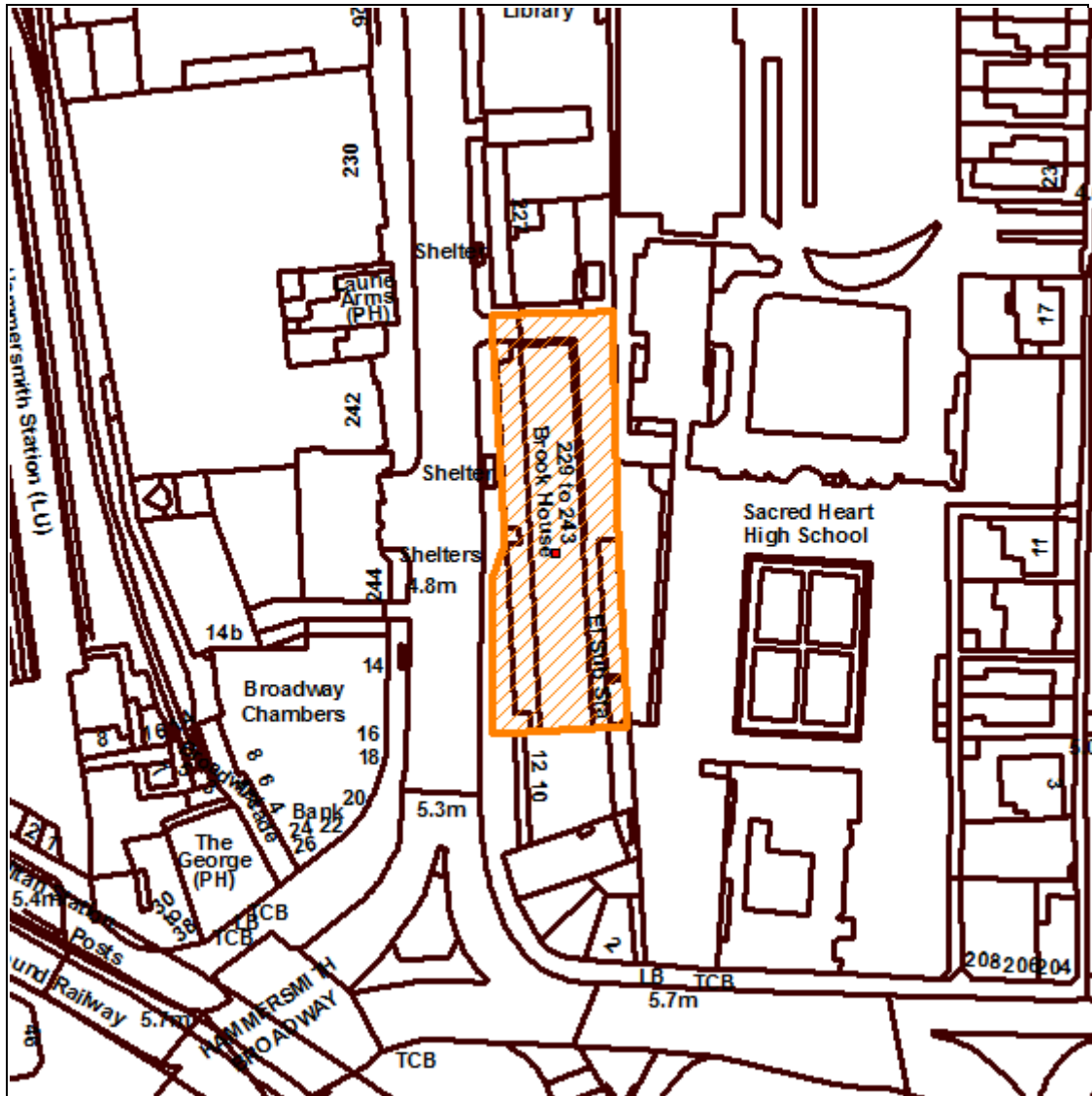
Contact officer: Charles Francis
Committee Co-ordinator
Governance and Scrutiny
Tel 020 8753 2062
E-mail: charles.francis@lbhf.gov.uk

Agenda Item 4

Ward: Hammersmith Broadway

Site Address:

Brook House 229 - 243 Shepherd's Bush Road London W6 7AN



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For identification purposes only - do not scale.

Reg. No:
2018/02776/FUL

Case Officer:
Grace Harrison

Date Valid:
20.08.2018

Conservation Area:
Constraint Name: Hammersmith Broadway
Conservation Area - Number 22
Constraint Name:
Brook Green Conservation Area - Number 3

Committee Date:
02.04.2019

Applicant:

Daniel Watney LLP
c/o Daniel Watney LLP

Description:

Change of use of building from offices (Class B1) with mixed commercial units on the ground floor into a hotel (Class C1) with a retail unit (Class A1) and restaurant (Class A3) on the ground floor; recladding of whole building to all elevations; erection of a two-storey roof extension; erection of a ground floor infill extension to the front elevation; associated highways works.

Drg Nos: 4089/P/199; 4089/P/200; 4089/P/201; 4089/P/202; 4089/P/203; 4089/P/204; 4089/P/205; 400401 Rev P1. 4089/P/301 Rev A; 4089/P/206; 4089/P/207; 4089/P/302 Rev A; 4089/P/303; 4089/P/304 Rev A; 4089/P/308; 4089/P/309; 4089/P/401; 4089/P/402; 4089/P/403; 4089/P/404; 4089/P/405 (all received 15.03.2019);

Application Type:

Full Detailed Planning Application

Officer Recommendation:

That the Committee resolve that the Strategic Director, Growth and Place be authorised to determine the application and grant permission up on the completion of a satisfactory legal agreement and subject to the condition(s) listed below

To authorise the Strategic Director, Growth and Place, after consultation with the Director of Law and the Chair of the Planning and Development Control Committee to make any minor changes to the proposed conditions or heads of terms of the legal agreement, any such changes shall be within their discretion.

- 1) The development hereby permitted shall not commence later than the expiration of 3 years beginning with the date of this planning permission.

Condition required to be imposed by section 91(1)(a) of the Town and Country Planning Act 1990 (as amended by section 51 of the Planning and Compulsory Purchase Act 2004).

- 2) The development shall be carried out and completed in accordance with the following approved drawings:

4089/P/199; 4089/P/200; 4089/P/201; 4089/P/202; 4089/P/203; 4089/P/204; 4089/P/205; 4089/P/206; 4089/P/207; 4089/P/301 Rev A; 4089/P/302 Rev A; 4089/P/303; 4089/P/304 Rev A; 4089/P/308; 4089/P/309; 4089/P/401; 4089/P/402; 4089/P/403; 4089/P/404; 4089/P/405 (all received 15.03.2019) and 400401 Rev P1.

In order to ensure full compliance with the planning application hereby approved and to prevent harm arising through deviations from the approved plans, in accordance with the policies of the London Plan (2016) and Policies DC1 and DC4 of the Local Plan (2018).

- 3) The external sound level emitted from plant, machinery or equipment at the development hereby approved shall be lower than the lowest existing background sound level by at least 10dBA in order to prevent any adverse impact. The assessment shall be made in accordance with BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity.

To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by noise from mechanical installations/ equipment, in accordance with Policy CC11 of the Local Plan (2018).

- 4) Prior to use, all machinery, plant or equipment, extract/ ventilation system and ducting at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration, in accordance with Policy CC13 of the Local Plan (2018).

- 5) Prior to commencement of the use, details shall be submitted to and approved in writing by the Council, of the installation, operation, and maintenance of the odour abatement equipment and extract system, including the height of the extract duct and vertical discharge outlet, in accordance with the 'Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems' January 2005 by DEFRA. Approved details shall be implemented prior to the commencement of the use and thereafter be permanently retained.

To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by cooking odour, in accordance with Policy CC13 of the Local Plan (2018).

- 6) The development hereby permitted shall not be occupied or used until the sustainability measures specified within the submitted BREEAM Pre-Assessment Report (Greengage, August 2018) have been fully implemented. The sustainability measures shall thereafter be permanently retained for the life of the development.

To ensure the implementation of sustainable design and construction measures, in accordance with Policies 5.1 and 5.2 of the London Plan (2016), the National Planning Policy Framework (2019) and Policies CC1 and CC2 of the Local Plan (2018).

- 7) The development hereby permitted shall not be occupied or used until the energy efficiency and carbon reduction measures specified within the submitted Energy Statement (by PSH) have been fully implemented. The measures shall thereafter be permanently retained for the life of the development.

To ensure the implementation of sustainable design and construction measures, in accordance with Policies 5.1 and 5.2 of the London Plan (2016), the National Planning Policy Framework (2019) and Policies CC1 and CC2 of the Local Plan (2018).

- 8) The development hereby approved shall be constructed and carried out in accordance with the submitted Drainage Plan (drawing no. 400401 Rev P1) and shall be permanently retained as such thereafter.

To ensure satisfactory provision for drainage of surface water run off from the site, in accordance with Local Plan (2018) Policies CC3 and CC4.

- 9) Prior to the commencement of each of the demolition and construction phases of the development hereby permitted, an Air Quality Dust Management Plan (AQDMP) in order to mitigate air pollution shall be submitted to and approved in writing by the council. The AQDMP must include an Air Quality Dust Risk Assessment (AQDRA) that considers sensitive receptors on-site and off-site of the development and is undertaken in compliance with the methodology contained within Chapter 4 of the Mayor of London 'The Control of Dust and Emissions during Construction and Demolition', SPG, July 2014 and the identified measures recommended for inclusion into the AQDMP. The AQDMP submitted must comply with the Mayor's SPG and should include: Inventory and Timetable of dust generating activities during demolition and construction; Site Specific Dust mitigation and Emission control measures in the table format as contained within Appendix 7 of Mayor's SPG including for on-road and off-road construction traffic; Use of on-road Ultra Low Emission Vehicles in accordance with the emission hierarchy (1) Electric (2) Hybrid (Electric-Petrol) (3) Petrol, (4) Hybrid (Electric-Diesel) (5) Diesel (Euro 6 and Euro VI); Detailed list of Non-Road Mobile Machinery (NRMM) used on the site. The NRMM should meet as minimum the Stage IV emission criteria of Directive 97/68/EC and its subsequent amendments. This will apply to both variable and constant speed engines for both NOx and PM. An inventory of all NRMM must be registered on the NRMM register <https://nrmm.london/user-nrmm/register>; Details of Air quality monitoring of PM10 where appropriate and used to prevent levels exceeding predetermined Air Quality threshold trigger levels. Developers must ensure that on-site contractors follow best practicable means to minimise dust and emissions at all times. Approved details shall be fully implemented and permanently retained and maintained during the demolition and construction phases of the development.

In the interest of air quality, to comply with the requirements of the NPPF, Policies 7.14 a-c of The London Plan (2016) and Policy CC10 of the Local Plan (2018).

- 10) Prior to commencement of above ground works in the development hereby permitted, (excluding site clearance, demolition and basement works) a Ventilation Strategy report in order to mitigate air pollution from combustion plant emissions and vehicle emissions shall be submitted to and approved in writing by the Council. The Ventilation Strategy report should include the following information:
 - a) Details and locations of the air intake locations for C1 use class at rear roof level
 - b) Details and locations of air intakes locations for A1 and A3 use class on the rear elevations
 - c) Details and locations of air extract locations to demonstrate that they are located a minimum of 2 metres away from the fresh air intakes

d) Details of the independently tested mechanical ventilation system with NO_x, PM_{2.5}, PM₁₀ filtration for C1 use class. The NO₂ filtration system shall have a minimum efficiency of 90% in the removal of Nitrogen Oxides/Dioxides, PM_{2.5} and PM₁₀ in accordance with BS EN ISO 10121-1:2014 and BS EN ISO 16890:2016.

The whole system shall be designed to prevent summer overheating and minimise energy usage. Chimney/boiler flues and ventilation extracts shall be positioned a suitable distance away from ventilation intakes, openable windows, balconies, roof gardens, terraces, and receptors. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications, and shall be the responsibility of the primary owner of the property. Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

In the interest of air quality, to comply with the requirements of the NPPF, Policies 7.14 a-c of The London Plan (2016) and Policy CC10 of the Local Plan (2018).

11) Prior to the occupation of the development hereby permitted, a report with details of the combustion plant in order to mitigate air pollution shall be submitted to and approved in writing by the council. The report shall include the following:

a) Details to demonstrate that the termination height of the shared Flue stack for all the combustion Plant has been installed a minimum of 2 metres above any openable window and/or roof level amenity area of the development plot and meet the overriding minimum requirements for Chimney heights of the third edition of the 1956 Clean Air Act memorandum.

b) Details of emissions certificates, and the results of NO_x emissions testing of each Ultra Low NO_x gas boiler and Emergency Diesel Generator Plant to demonstrate that all the Ultra Low NO_x Gas fired boilers, Emergency Diesel Generator Plant and associated abatement technologies shall meet a minimum dry NO_x emissions standard of 30 mg/kWh (at 0% O₂) and 95 mg/Nm⁻³ (at 5% O₂) respectively by an MCERTS accredited laboratory shall be provided following installation and thereafter on an annual basis to verify compliance of the relevant emissions standards in part b). Where any combustion plant does not meet the relevant emissions Standards in part b) above, it should not be operated without the fitting of suitable secondary NO_x abatement Equipment or technology as determined by a specialist to ensure comparable emissions.

c) Details to demonstrate where secondary abatement is used for the Emergency Diesel Generator the relevant emissions standard in part b) is met within 5 minutes of the generator commencing operation. During the operation of the emergency Diesel generators there must be no persistent visible emission. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications. The diesel fuelled generators shall only be used for a maximum of 48 hours when there is a sustained interruption in the mains power supply to the site, and the testing of these diesel generators shall not exceed a maximum of 12 hours per calendar year.

Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

In the interest of air quality, to comply with the requirements of the NPPF, Policies 7.14 a-c of The London Plan (2016) and Policy CC10 of the Local Plan (2018).

- 12) Prior to occupation of the development hereby permitted a Low Emission Strategy for the operational phase of the development in order to mitigate the impact of air pollution shall be submitted to and approved in writing by the Council. The Low Emission Strategy must detail the remedial action and mitigation measures that will be implemented to protect receptors (e.g. abatement technology for energy plant, design solutions). This Strategy must make a commitment to implement the mitigation measures (including NOx emissions standards for the chosen energy plant) that are required to reduce the exposure of poor air quality and to help mitigate the development's air pollution impacts, in particular the emissions of NOx and particulates from on-road vehicle transport by the use of Ultra Low Emission Vehicles in accordance with the emissions hierarchy (1) Cargo bike (2) Electric Vehicle, (3) Hybrid (non-plug in) Electric Vehicle (HEV), (4) Plug-in Hybrid Electric Vehicle (PHEV), (5) Alternative Fuel e.g. CNG, LPG, and energy generation sources. Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

In the interest of air quality, to comply with the requirements of the NPPF, Policies 7.14 a-c of The London Plan (2016) and Policy CC10 of the Local Plan (2018).

- 13) Prior to the occupation of the development hereby permitted, details of the construction of the green wall on Shepherd's Bush Road shall be submitted to and approved in writing by the Council. Details shall include system type, planting schedule and a maintenance plan. The green infrastructure shall be constructed and planted in full accordance with the Phytosensor Toolkit, Citizen Science, May 2018 and the 'First Steps in Urban Air Quality', TDAG, 2017 guidance documents within the first available planting season following completion of Buildings. Any plants which die, are removed, become seriously damaged and diseased within a period of five years from completion of these buildings shall be replaced in the next planting season with others of similar size and species. Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

In the interest of air quality and visual amenity, to comply with the requirements of the NPPF, Policies 7.14 a-c of The London Plan (2016) and Policy CC10 of the Local Plan (2018).

- 14) No development shall commence until a preliminary risk assessment report is submitted to and approved in writing by the Council. This report shall comprise: a desktop study which identifies all current and previous uses at the site and surrounding area as well as the potential contaminants associated with those uses; a site reconnaissance; and a conceptual model indicating potential pollutant linkages between sources, pathways and receptors, including those in the surrounding area and those planned at the site; and a qualitative risk assessment of any potentially unacceptable risks arising from the identified pollutant linkages to human health, controlled waters and the wider environment including ecological receptors and building materials. All works must be carried out in compliance with and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. This condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with Policy CC9 of the Local Plan (2018).

- 15) No development shall commence until a site investigation scheme is submitted to and approved in writing by the Council. This scheme shall be based upon and target the risks identified in the approved preliminary risk assessment and shall provide provisions for, where relevant, the sampling of soil, soil vapour, ground gas, surface and groundwater. All works must be carried out in compliance with and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. This condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with Policy CC9 of the Local Plan (2018).

- 16) Unless the Council agree in writing that a set extent of development must commence to enable compliance with this condition, no development shall commence until, following a site investigation undertaken in compliance with the approved site investigation scheme, a quantitative risk assessment report is submitted to and approved in writing by the Council. This report shall: assess the degree and nature of any contamination identified on the site through the site investigation; include a revised conceptual site model from the preliminary risk assessment based on the information gathered through the site investigation to confirm the existence of any remaining pollutant linkages and determine the risks posed by any contamination to human health, controlled waters and the wider environment. All works must be carried out in compliance with and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. This condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with Policy CC9 of the Local Plan (2018).

- 17) Unless the Council agree in writing that a set extent of development must commence to enable compliance with this condition, no development shall commence until, a remediation method statement is submitted to and approved in writing by the Council. This statement shall detail any required remediation works and shall be designed to mitigate any remaining risks identified in the approved quantitative risk assessment. All works must be carried out in compliance with and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. This condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with Policy CC9 of the Local Plan (2018).

- 18) Unless the Council agree in writing that a set extent of development must commence to enable compliance with this condition, no development shall commence until the approved remediation method statement has been carried out in full and a verification report confirming these works has been submitted to, and approved in writing, by the Council. This report shall include: details of the remediation works carried out; results of any verification sampling, testing or monitoring including the analysis of any imported soil; all waste management documentation showing the classification of waste, its treatment, movement and disposal; and the validation of gas membrane placement. If, during development, contamination not previously identified is found to be present at the site, the Council is to be informed immediately and no further development (unless otherwise agreed in writing by the Council) shall be carried out until a report indicating the nature of the contamination and how it is to be dealt with is submitted to, and agreed in writing by, the Council. Any required remediation shall be detailed in an amendment to the remediation statement and verification of these works included in the verification report. All works must be carried out in compliance with and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. This condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with Policy CC9 of the Local Plan (2018).

- 19) Unless the Council agree in writing that a set extent of development must commence to enable compliance with this condition, no development shall commence until an onward long-term monitoring methodology report is submitted to and approved in writing by the Council where further monitoring is required past the completion of development works to verify the success of the remediation undertaken. A verification report of these monitoring works shall then be submitted to and approved in writing by the Council when it may be demonstrated that no residual adverse risks exist. All works must be carried out in compliance with and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. This condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with Policy CC9 of the Local Plan (2018)

- 20) The development hereby approved shall not be used or occupied until a plan of the basement car park indicating four blue badge parking spaces, two electric

vehicle charging points (one active provision and one passive provision), and a swept path analysis for entries and exits has been submitted to, and approved in writing by the council. Thereafter the basement car park shall be implemented in accordance with the plan approved and permanently retained as such thereafter.

To ensure satisfactory provision for car parking for blue badge holders and electric vehicle charging, in accordance with Policy T4 and Appendix 7 of the Local Plan (2018) and Key Principle TR7 of the Planning Guidance Supplementary Planning Document (2018).

- 21) The development hereby approved shall not be used or occupied until provision for 22 long-stay cycle parking spaces has been made in the form of an enclosed vertical cycle store to the rear of the building at ground floor level, in accordance with that shown on approved drawing no 4089/P/200. Thereafter the cycle parking spaces shall be permanently retained as such thereafter.

To ensure satisfactory provision for cycle parking and to thereby encourage sustainable and active modes of travel, in accordance with Local Plan (2018) T3 and Appendix 8 of the Planning Guidance Supplementary Planning Document (2018).

- 22) Prior to commencement of the development hereby approved, a Demolition and Construction Logistics Plan shall be submitted to, and approved in writing by, the Council. This must be in accordance with Transport for London (TfL) requirements and should seek to minimise the impact of construction traffic on nearby roads and restrict construction trips to off-peak hours only. Thereafter the approved details shall be implemented throughout the project period.

To ensure that construction works do not adversely impact on the operation of the public highway, in accordance with Policies T1 and T7 of the Local Plan (2018).

- 23) The development hereby approved shall be operated in accordance with the submitted Delivery and Servicing Plan (RGP, report ref. PRPP/17/3761/DSP03) for the life of the development.

To ensure satisfactory arrangements for deliveries to and servicing of the development to ensure these vehicle movements do not cause congestion or other unnecessary disruption to the local highways network, in accordance with Local Plan (2018) Policy T1 and Key Principle TR27 of the Planning Guidance Supplementary Planning Document (2018).

- 24) The development hereby permitted shall not commence until details and samples of all materials to be used on the external faces of the building, including walls, roof coverings, windows and doors, have been submitted to and approved in writing by the Council. No part of the development shall be used or occupied prior to the completion of the development in accordance with the approved details.

To ensure a satisfactory external appearance, in accordance with Policies DC1 and DC4 of the Local Plan (2018).

- 25) Prior to commencement of the development hereby permitted, a sample panel of a bedroom window module to the front elevation, including surrounding brickwork,

shall be constructed on site and then subsequently inspected and approved in writing by the Council. The development shall only be carried out in accordance with the details approved and it shall thereafter be permanently retained as such.

To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, to preserve the character and appearance of the adjacent conservation area in accordance with Local Plan (2018) Policies DC1 and DC4.

- 26) The development shall not commence until detailed drawings in plan, section and elevation at a scale of no less than 1:20, have been submitted and approved by the council with regards to the following elements:

- Typical ground floor shopfront;
- Front bedroom window module;
- Ground floor front entrance bays;
- Front dormer windows;
- Lift overrun;
- Rear projecting bay box.

No part of the development shall be used or occupied prior to the completion of the development in accordance with the approved details.

To ensure a satisfactory external appearance and prevent harm to the street scene, in accordance with Policies DC1, DC4 and DC8 of the Local Plan (2018).

- 27) Prior to the occupation of the development hereby permitted, details of the construction of a green roof on the flat roof of the building shall be submitted to and approved in writing by the Council. Details shall include system type, planting schedule and a maintenance plan. The approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

In the interest of air quality, visual amenity and sustainable drainage, to comply with the requirements of the NPPF, Policies 7.14 a-c of The London Plan (2016) and Policy CC10 of the Local Plan (2018).

- 28) No plumbing, extract flues or pipes may be fixed on the front elevation of the building.

To ensure a satisfactory external appearance and to prevent harm to the street scene, in accordance with Policies DC1 and DC4 of the Local Plan 2018.

- 29) No plant, machinery or equipment shall be mounted externally on any part of the building outside of the designated plant areas identified on the approved drawings.

To ensure a satisfactory external appearance and to prevent harm to the street scene, in accordance with Policies DC1 and DC4 of the Local Plan 2018.

- 30) No alterations or additions shall be made to the external appearance of the building (including the installation of air-conditioning units, ventilation fans, extraction equipment) without full planning permission first being obtained.

To ensure a satisfactory external appearance and to prevent harm to the amenities of the occupiers of neighbouring residential properties, in accordance with Policies DC1 and DC4 of the Local Plan (2018).

- 31) No external security shutters or roller blinds shall be installed externally to the shopfront hereby approved.

To ensure a satisfactory external appearance in accordance with Policies DC1 and DC5 of the Local Plan (2018).

- 32) The use of the restaurant (Class A3) premises shall not be permitted outside of the hours of 06:00 to 12 o'clock midnight Mondays to Saturdays or outside of the hours of 07:00 to 23:00 on Sundays and Bank Holidays.

To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from activities or people at or leaving the site, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

- 33) The use of the retail unit (Class A1) premises shall not be permitted outside of the hours of 06:00 to 12 o'clock midnight Mondays to Saturdays or outside of the hours of 07:00 to 23:00 on Sundays and Bank Holidays.

To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from activities or people at or leaving the site, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

- 34) The development hereby approved shall not be used or occupied until full details of any external artificial lighting have been submitted to, and approved in writing by, the council. Those details shall include, but not be limited to:

- Lighting contours to demonstrate that the vertical illumination of neighbouring premises is in accordance with the recommendations of the Institute of Lighting Professionals in the 'Guidance Notes for the Reduction of Light Pollution 2011'; and
- Measures to minimise the use of lighting and prevent glare and sky glow by correctly using, locating, aiming and shielding luminaires.

The approved details shall be implemented prior to the development first being used and permanently retained thereafter. No external artificial lighting shall be installed unless it is in accordance with the details which have previously been approved in writing by the local planning authority.

To ensure a satisfactory external appearance, particularly at night, and to ensure that the amenities of neighbouring properties are not adversely affected through light pollution, in accordance with Policies DC1, DC4 and CC13 of the Local Plan (2018).

Justification for Approving the Application:

- 1) 1. Land Use: Considering the current supply of office space in Hammersmith as a whole, it is considered that the loss of the existing building for office use would only have a very limited impact on the supply of office space in the borough.

Regard has also been had to the condition of the existing building, the costs and constraints to its refurbishment or redevelopment, and the benefits of the proposed hotel for helping to enliven and regenerate this part of the town centre. It is judged that no objections should be raised in terms of Policies E1 and E2 of the Local Plan (2018).

2. Design: The development is considered to comply with Local Plan (2018) Policies DC1, DC2, DC4 and DC8 which require a high standard of design in all extensions and alterations to existing buildings, compatible with the scale and character of existing development and its setting, and London Plan policies 7.1, 7.4, 7.6 which seek a high quality in design and architecture, requiring new developments to have regard to the pattern and grain of existing development. The character and appearance of the adjacent conservation area would be preserved. Furthermore, it is considered that the additional scale and mass of the building would not cause harm to the surrounding heritage assets, in particular the Grade II Listed Sacred Heart High School.

3. Accessibility and Safety: The development would provide a safe and secure environment for all users, and would provide ease of access for all people, including disabled people, in accordance with in accordance with Policies DC1, DC2, HO6 and HO11 of the Local Plan (2018) and Policies 3.8 and 7.2.

4. Highways matters: It is considered that the scheme would not have a significant impact on the highway network or local parking conditions, and is thus considered to be acceptable. Satisfactory provision would be made for cycle parking and car parking for blue badge holders. There are available public transport and other services nearby and adequate arrangements for deliveries and servicing would be provided. The development thereby accords with Local Plan (2018) Policies T1, T3, T4, T5 and T7 as well as CC7 and London Plan (2016) Policies 6.1, 6.3, 6.10, 6.11 and 6.13.

5. Environment: The impact of the development with regards to land contamination, flood risk, tree protection and air quality are considered to be acceptable subject to the recommended conditions, in accordance with Local Plan (2018) Policies CC9, CC10, CC3, CC4 and OS5.

6. The proposed development can meet the "very good" BREEAM rating, demonstrating compliance with Local Plan Policy CC2. Energy efficiency measures and renewable energy generation, in the form of Air Source Pumps, will reduce CO2 emissions by 41.2% compared to the Building Regulations 2013 requirements, which exceeds the minimum 35% reduction target set in the London Plan, in compliance with Local Plan Policy CC1.

LOCAL GOVERNMENT ACT 2000 LIST OF BACKGROUND PAPERS

All Background Papers held by Andrew Marshall (Ext: 4841):

Application form received: 17th August 2018
Drawing Nos: see above

Policy documents: National Planning Policy Framework (NPPF) 2019
The London Plan 2016
LBHF - Local Plan 2018
LBHF – Planning Guidance Supplementary Planning Document
2018

Consultation Comments:

Comments from:
Thames Water - Development Control

Dated:
05.09.18

Neighbour Comments:

Letters from:	Dated:
Wagamama, 244 Shepherd's Bush Road London W6 7NN	18.09.18
238 Shepherds Bush Road London W6 7NL	18.09.18
Plaza Pizza, Brook House London w6 7al	20.09.18
238 Brook House London w6 7an	20.09.18
3rd Floor 227 Shepherds Bush Road Hammersmith W6 7AU	19.09.18
Third Floor 227 Shepherd's Bush Road London W6 7AU	29.10.18
12 c-d Brook House London w6 7al	26.09.18
Brook House 3rd Floor 229-243 Shepherds Bush Road W6 7AN	09.11.18
12B Brook House London W6 7AL	26.09.18

OFFICER'S REPORT

1.0 SITE DESCRIPTION AND HISTORY

1.1 The application relates to an office building with a basement car park, with commercial units on the ground floor (A1, A2, A3 and Sui Generis uses) and four floors of office accommodation above (B1a), known as Brook House. It is on the eastern side of Shepherd's Bush Road, just to the north of Hammersmith Broadway.

1.2 The site is not within a conservation area but is adjacent to the Hammersmith Broadway Conservation Area, the boundary of which runs along the opposite side of Shepherd's Bush Road, and the Brook Green Conservation Area, the boundary of which runs along the eastern and southern boundaries of the site.

1.3 Brook House is also close to a number of listed buildings. Sacred Heart High School, which is Grade-II*, adjoins the site to the rear. The Grade-II listed old Hammersmith Fire Station is directly opposite the site on the western side of Shepherd's Bush Road.

1.4 The site is situated within the Hammersmith Town Centre boundary and benefits from a Public Transport Accessibility Level of 6b (according to Transport for London's methodology) which is the highest level.

1.5 Relevant planning history for the site includes:

2014/03718/PD56 - Prior approval granted for Change of use of first, second, third, and fourth floor levels from offices (Class B1) into 30 self-contained flats (Class C3).

2017/00707/PD56 - Prior approval refused for Change of use of the first, second, third and fourth floor levels from offices (Class B1) into 30 (10 x 1 bed and 20 x two bed) self-contained flats (Class C3).

2018/00294/PD56 - Prior approval granted for Change of use of the first, second, third and fourth floor levels from offices (Class B1) into 30 (10 x 1 bed and 20 x two bed) self-contained flats (Class C3). Approved on 28.03.2018 and is therefore still extant.

2.0 APPLICATION

2.1 The current application seeks permission for the following:

- Rear extensions at third and fourth floor level;
- Erection of two additional floors (plus plant enclosure and lift overrun) at roof level;
- Infilling of the existing covered parade at street level to create additional floorspace at ground floor level; including the creation of new shopfronts along the whole elevation;
- Replacement of the front and rear façades;
- Change of use of the whole building from offices (Class B1a) into a hotel (Class C1) comprising 189 bedrooms with a restaurant (Class C3) and retail unit (Class A1) on the ground floor;
- Reconfiguration of the existing basement car park.

2.2 The prospective hotel operator is "Premier Inn" and the prospective restaurant owner is "Bar + Block" who would provide 150 covers. The prospective operator of the retail unit is "Costa Coffee".

2.3 The respective floorspace of each use would be as follows:

Hotel: 5523sq.m.

Restaurant: 569sq.m.

Retail unit: 61sq.m.

3.0 PUBLICITY AND CONSULTATION RESPONSES

3.1 The application was publicised by means of individual letters of notification (119) as well as a site notice and press advert. As a result of the notifications 9 responses were received (238 Brook House, 238 Shepherd's Bush Road, Wagamama restaurant 244 Shepherd's Bush Road, Plaza Pizza, Brook House, Third Floor 277 Shepherd's Bush Road, 12 C-D Brook House, 12B Brook House, and the Sacred Heart High School).

3.2 A business within 227 Shepherd's Bush Road notes that there is an access road between their premises and Brook House, which serves as an access to their car park and is also an emergency escape route.

[Officer Comment: Any rights of access over the shared driveway would need to be discussed with the owners and future operators of Brook House. Officers note that no

part of the proposals would preclude access to the rear of the buildings for the users of 227 Shepherd's Bush Road once the development was complete].

3.3 The Sacred Heart High School wrote to confirm that they do not have any objections to the proposals.

3.4 The Hammersmith Society responded and made the following comments:

- The proposed section of green wall is a meagre contribution to the public realm and does little to relieve the inhospitable pedestrian environment; more green wall sections, or recessing the windows to accommodate high quality planters along the street frontage, could address this;
- There is no lighting strategy submitted; request a condition that the typical "Premier Inn" purple lighting should not appear on the exterior of the building.

3.5 The remainder of the representations were in support of the proposals on the basis that: the existing building is unattractive and this will be a big improvement; a hotel would bring tourists into the town centre and be good for local businesses; and that this is an exciting opportunity for Hammersmith.

3.6 Thames Water responded to say that they have identified an inability of the existing water network infrastructure to accommodate the needs of the development, and that the proposed development is located within 15m of a strategic water main, and request a piling method statement to be submitted prior to commencement.

[Officer Comment: The applicants have confirmed that no piling is proposed as part of the construction. Informatives have been included with regards to the other matters].

3.7 An earlier iteration of the proposal was presented to the councils Design Review Panel in January 2018, prior to the application being submitted. The Panel acknowledged the constraints imposed by the plan to retain the concrete structure. The Panel had concerns with regard to both the front and rear elevations, and the proposed additional massing of the two additional floors and cantilevered floors and their impacts on the surrounding townscape and in particular the neighbouring listed school. The Panel considered that that the proposed design had no clear and convincing approach and justification, and that a reduced palette of materials and a calmer, more coherent approach the façade would be beneficial. The Panel asked the applicants to investigate alternative designs and compositions for the front elevation and to gather further information on the likely impacts of the increased massing.

3.8 These concerns have been addressed in negotiation with officers. The current proposal is a significantly "calmer and more coherent" façade treatment, with the palette of materials reduced and finer detailing added to both the window modules and the ground floor elevation. The impacts of the additional massing on the listed school has been assessed through View Studies submitted by the applicants and have found to be acceptable.

3.9 Some amendments have been made to the design since the application was first submitted, following further negotiations with Officers. The scheme has not been fundamentally altered, however the changes secured relate to the detailed design, particularly of the shopfronts, front bay window modules, the materials used for the rear elevation, and the massing and position of the lift overrun.

4.0 PLANNING CONSIDERATIONS

4.1 The relevant planning considerations in this case, to be assessed against the policies in the National Planning Policy Framework (NPPF, 2018), The London Plan (as amended March 2016) and the Hammersmith and Fulham Local Plan (2018) and Planning Guidance Supplementary Planning Document (SPD, 2018) are:

- The loss of existing B1a office accommodation
- Loss of existing commercial units/ businesses at ground floor level
- The principle of creating a new hotel in this location
- Accessibility of new hotel
- Access, servicing, and delivery arrangements
- Sustainability and energy
- Flood risk and sustainable drainage
- Design of the proposed extensions and façade refurbishment, and impact on visual amenity and the setting of adjacent conservation areas and nearby Listed Buildings and locally listed Buildings of Merit.

+ LAND USE

4.2 Local Plan (2018) Policy E3 states that permission will be granted for new visitor accommodation facilities or the extension of existing facilities within the three town centres, subject to the following:

- The development being well-located in relation to public transport;
- The development and any associated uses not having a detrimental impact on the local area;
- No loss of priority uses such as permanent housing;
- Provision of adequate off-street servicing and pick up points for the type of facility proposed;
- At least 10% of hotel bedrooms designed as wheelchair accessible;
- The facility being of a high standard of design; and
- The scheme adding to the variety and quality of visitor accommodation available locally.

4.3 Assessed against these criteria, the site is extremely well-located in terms of public transport, with a PTAL rating of 6b. Considering its busy town centre location, it is considered that a new hotel would not have a detrimental impact on the local area in terms of noise or disturbance to any nearby residential properties (the nearest being the iQ student accommodation opposite). The proposed operator, "Premier Inn" is an established brand of good-quality, budget-friendly hotels popular with tourists and business travellers, and would therefore be well suited to add to the variety and quality of visitor accommodation available in the town centre. Transport, servicing, access, and design are also found to be acceptable and will be assessed in the relevant sections below. Therefore, subject to consideration of the loss of employment use, the principle of hotel use on this site is considered to be acceptable in accordance with Policy E3.

4.4 The loss of the existing employment (office) floorspace is considered against Local Plan (2018) Policies E1 and E2.

4.5 Policy E1 states that the council will support the retention, enhancement and intensification of existing employment uses. According to Policy E2, permission for loss of employment floorspace will only be granted where:

1. Continued use would adversely impact on residential areas;
2. An alternative use would give a demonstrably greater benefit that could not be provided on another site; or
3. It can be evidenced that the property is no longer required for employment purposes.

4.6 In this instance, criteria (1) and (2) are not applicable to the current application. The site is within Hammersmith Town Centre and continued office use would not adversely impact on any residential area. Furthermore, it is not argued that a hotel use could not be provided on another site. Therefore, the applicants have sought to demonstrate that the property is no longer required for employment purposes, in accordance with criterion (3) of Policy E2.

4.7 Where the loss of employment use is proposed in line with (3), Policy E2 states that the council will have regard to:

- The suitability of the site or premises for continued employment use with or without adaptation;
- Evidence of unsuccessful marketing over a period of at least 12 months;
- The need to avoid adverse impact on established clusters of employment use; and
- The need to ensure sufficient stock of premises and sites to meet local need for a range of types of employment uses, including small and medium sized enterprises, in appropriate locations.

4.8 The building has been becoming vacant over several years as leases have been expired (only one business, TAP Portugal, remains), and no marketing has been undertaken for continued office use. Therefore, the key issue to be determined in this case is the suitability of the building for continued employment use, with or without adaptation. The applicant states that marketing and re-letting could not be undertaken without significant investment to upgrade the existing floorspace, and to this end they have submitted a condition survey and viability report to demonstrate that continued office use is not commercially viable. The council also received a letter from CRF Health, who were the largest tenant for a number of years, occupying four of the building's 8 suites. They advised that the "dated building is no longer fit for our purpose or our growth needs" and they have moved to new premises on Hammersmith Embankment.

4.9 The applicant's viability report considers three options for continued office use: (i) Upgrading the existing building; (ii) Upgrading existing building + creation of additional floorspace (the same amount as proposed under the current hotel scheme) and (iii) demolition and redevelopment as new-build offices. The report concludes that none of these options would be commercially viable. It is stated that whilst the refurbished (and extended) office space would be marketed as Grade A, it would not be expected to achieve viable rents due to the constraints of the original building design, including its low floor-to-ceiling heights, lack of light, and competition from better office schemes elsewhere. The report also concludes that whilst a complete redevelopment would provide better quality space; due to the limited and inefficient rectilinear floorplate (with higher build costs) it would not deliver the quantum of space required to make a redevelopment viable.

4.10 The applicant's viability report has been reviewed by an independent surveyor appointed by the council who was instructed to report on its methodology and conclusions, and to give an independent view on the viability of continued office use. In their view, office use could only viably be continued through option (iii), total redevelopment for office use, albeit it is recognised that any proposal for new offices on the site carries a significant degree of uncertainty on the process, level of investment required and potential for final occupancy. Either of the other two options would result in space that was not able to compete on a like-for-like basis with other new or refurbished office developments in Hammersmith (such as 245 Hammersmith Road, 1 Lyric Square, Kings House and Shortlands, for example) and would be unlikely to attract the quality of tenant required.

4.11 The independent review acknowledges that the current proposal would have other material benefits to help mitigate the loss of employment floorspace. The benefits of having additional hotel accommodation in the town centre must also be considered. "Premier Inn" is a budget hotel chain popular with both tourists and business travellers and is therefore likely to be busy all year round, bringing people into Hammersmith who will then be able to visit local shops and restaurants, particularly in the evenings, thus contributing to the local day and night-time economy. In terms of visual amenity, the existing building's dated façade makes a negative contribution to the streetscene, and would be substantially improved as a result of the proposed refurbishment of the building, this is another material planning benefit to the scheme.

4.12 In their Social Value Statement, the applicant also sets out a number of commitments for the build programme, including 20% local labour, work placements for local college students, and a 20% local spend during procurement. In addition, it states that Premier Inn are committed to delivering their own Social Value Action Plan (under their "Force for Good" programme) including jobs and apprenticeships for local people, links with schools for annual work experience placements, opportunities for disabled people and Community Impact Days. Local Plan Policy E4 requires the provision of appropriate employment and training initiatives for local people of all abilities in the construction of major developments and larger-employment generating developments, including visitor accommodation facilities when these are completed. Accordingly there will be a requirement in the Section 106 agreement for a Jobs, Employment, Business and Training Strategy to be agreed with the Council prior to commencement, together with a contribution (£72,875) towards supporting paid apprenticeships and work placements.

4.13 Therefore, on balance, considering both the condition of the existing building, the costs and constraints to its refurbishment or redevelopment, and the benefits of the proposed hotel for helping to enliven and regenerate this part of the town centre, it is judged that no objections be raised in terms of Policies E1 and E2 of the Local Plan (2018). Considering the current supply of office space in Hammersmith as a whole, it is considered that the loss of Brook House for office use would only have a very limited impact on the supply of office space in the borough.

4.14 There are currently 6 small commercial units on the ground floor of Brook House. The units are a mix of A1, A2, A3 and Sui Generis uses:

- Summit recruitment (A2) (Vacant)
- Tanning Shop (Sui Generis) (Currently occupied, soon moving to 85 King Street)
- La Piazza restaurant (A3) (Currently occupied)

- Alexander Barbers (A1) (Vacant)
- Royale pharmacy (A1) (Currently occupied)
- Street Eats (A3) (Vacant)

4.15 The site falls within Hammersmith Town Centre, and therefore Local Plan Policy TLC2 applies. The parade is outside of the Prime Retail Frontage, and therefore only Criteria (3) - (6) of this policy apply. The proposed ground floor frontage would be dominated by a new restaurant (A3), ancillary to the hotel but also open to the public, with a smaller retail unit (A1 likely to be a "Costa Coffee" shop, also open to the public). The entrance to the hotel, which forms only a small proportion of the frontage, would be located at the southern end of the building. These ground floor uses are considered to be appropriate to the town centre and would contribute to the vitality of this side of the street, which is currently further disadvantaged by the uninviting space created by the covered parade and the high vacancy rate of the existing units. For these reasons, no objections would be raised in terms of Local Plan (2018) Policy TLC2.

+ DISABLED ACCESS

4.16 Local Plan (2018) Policy E3 requires at least 10% of new hotel bedrooms to be designed as wheelchair accessible. This reflects London Plan (2016) Policy 4.5. In the application of this policy there is the opportunity to apportion the requirement between different models of provision. Within the proposed development, 18 of the bedrooms would be wheelchair accessible (8 would be fully accessible and 10 would be easily adaptable, wheelchair accessible rooms with fixings for adaptation). The upper floors would be accessed via two lifts, with level access from the main entrance to the lifts, and the building is designed in accordance with Part M of the Building Regulations. Disabled parking bays for Blue Badge holders are to be provided in the basement car park, with one of the two lifts extending down to the level of the basement car park. These measures will ensure the building is accessible and inclusive to all who may visit or use it, in accordance with Key Principle DA1 of the Planning Guidance SPD.

+ DESIGN AND VISUAL AMENITY

4.17 The successful integration of the site with its surroundings is key to any development on this site. The design of the elevations and the relationships between the proposed design and the adjoining and surrounding frontages are of great importance to securing an enhancement of the street scene.

4.18 The National Planning Policy Framework (NPPF, 2019) seeks to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. The NPPF also requires that proposals should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. The NPPF also states that good design is a key aspect of sustainable development, and should contribute positively to making places better for people. Part 12 of the NPPF outlines the requirement for good design and Paragraph 127 sets out that planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁶; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

4.19 Chapter 7 of the London Plan (2016) sets out the Mayor's policies on a range of issues regarding places and space, setting out fundamental principles for design. Policy 7.1 (Lifetime Neighbourhoods) states that the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood. Policy 7.2 (An Inclusive Environment) requires all new development in London to achieve the highest standards of accessible and inclusive design. Policy 7.3 (Designing out crime) seeks to ensure that developments reduce the opportunities for criminal behaviour and contribute to a sense of security, without being overbearing or intimidating.

4.20 Policies 7.4 (Local character), 7.5 (Public realm) and 7.6 (Architecture) of the London Plan are all relevant and promote the high-quality design of buildings and streets. Policy 7.4 states that development should have regard to the form and function, and structure of an area, place or street and the scale, mass, and orientation of surrounding buildings whilst Policy 7.6 states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings. Policy 7.8 (Heritage assets and archaeology) states that development affecting heritage assets and their setting should conserve their significance by being sympathetic to their form, scale, materials, and architectural detail.

4.21 The Council's Local Plan (2018) Policies DC1, DC2 and DC8 are particularly relevant to the assessment of design. DC1 (Built Environment) states that all development within the borough should create a high quality urban environment that respects and enhances its townscape context and heritage assets. There should be an approach to accessible and inclusive urban design that considers how good design, quality public realm, landscaping and land use can be integrated to help regenerate places. Policy DC2 (Design of New Build) sets out to ensure that new build development will be of a high standard of design and compatible with the scale and character of existing development and its setting. Policy DC8 (Heritage and Conservation) aims to conserve the significance of the borough's historic environment by protecting, restoring and enhancing its heritage assets.

4.22 The proposed design has been assessed against the relevant National guidance and regional and local policies. In order to meet these policies, the proposed design must be of an appropriate scale and height such that it does not have a detrimental impact on key views and heritage assets or their settings. It needs to be of an appropriate form and high-quality design to develop a sense of place.

Existing building:

4.23 Brook House is located at the Southern end of Shepherds Bush Road, in close proximity of Hammersmith Broadway at the heart of the town centre. The site is linear and narrow running north to south fronting onto Shepherds Bush Road which serves as a primary link from Hammersmith Broadway and the A4 to the south and Shepherds Bush to the north. The site benefits from the town centre location with its leisure and commerce offer and vitality. In the immediate surroundings, there is a mix of restaurants & bars, theatres, retail, and offices. The site lies adjacent to two conservation areas, and close to some of the key Listed Buildings and Buildings of Merit in the town centre. Brook House, whilst benefitting from this proximity, currently offers little back to the townscape having a poor relationship to it. Neither does it provide a sympathetic setting for heritage assets around the site (described below). An opportunity exists through redevelopment to provide enhanced quality elevations which would be provide a positive contribution both to the street scene and setting of heritage assets.

4.24 The existing building consists of basement, ground and 4 upper floors. The massing follows the shape of the site presenting a long linear façade to Shepherds Bush Road and has reduced massing to the rear. It is of limited architectural merit. There are three cores to the building with the prominent central core defining the two halves of the building to the north and south. The Shepherds Bush Road facade is typical of the 1960s with a repeating pattern of brown metal clad facade and simple fenestration. The long repeating façade has no depth to the facade and modelling to give it some relief. The existing cladding to Shepherds Bush Road is reaching the end of its serviceable life, and now appears dated.

4.25 In their submission, the applicants have highlighted further shortcomings of the existing building in design terms. These include:-

1. The recessed ground level is uninviting and does not offer the visibility which appeals to modern retailers and restaurants
2. The existing office entrance is dated and uninviting. It suffers from poor street presence and disabled access to the reception area is limited to using a platform lift
3. The premises are not suitable for continued office use because existing mechanical and electrical services are not of a standard which modern office tenants expect and require
4. The office space suffers from low ceiling heights, in particular beneath the fan cool units located along the central circulation spine which is as low as 2160mm
5. The office space feels dark and has little ventilation
6. The existing cores are inadequate in terms of modern office standards
7. The existing toilet facilities are of a poor standard and there is only one accessible toilet in the entire building.
8. The single glazing to the core areas dates from the 1960s, leaking heat and energy.

Proposed Design:

4.26 The scheme proposes to retain the existing concrete structural frame but in order to accommodate the new hotel use and associated facilities, the proposals include extensions to the building's envelope. In particular: an increase in height by two floors; a build out on the rear elevation; and an infill at ground floor to bring the building line forward, removing the existing colonnade. The primary reason for the additions to upper floors is to accommodate the required number of bedrooms. The size of the extensions

is determined to a large extent by standard room sizes, to make the scheme viable. Ultimately, these additions increase the scale and massing of the building, however officers are generally comfortable that the increased height is appropriate for its Town Centre location, and would not disrupt the contextual height datum established for this part of Shepherds Bush Road which sits at between 4 and 6 stories. The additional two floors will be located within a new mansard roof which is similar to the pitch and profile of its neighbour to the south No. 10 Hammersmith Broadway. Dormer windows have been added to the lower front roof slope, which are set behind the parapet, such that the parapet, which would be at a similar height to the existing, remains the main determinant of the buildings scale in the street scene. Officers consider that the proposed roof form would be suitably subservient, and not appear overly dominant in views.

4.27 On the ground floor, the decision to remove the colonnade and bring the frontage forward to the street edge is considered to be a positive design move, which by giving greater definition to the street, will improve the buildings relationship with the public realm and provide a more active frontage that clearly expresses base of the building, and its entrances. The ground floor is broken into a series of repeating glazed shopfront bays detailed with projecting aluminium frames and recessed channels to the pilasters to provide depth and visual interest.

4.28 With the constraints of retaining the buildings frame, the requirements of the hotel, and the length of the frontage, the design of the middle portion of the building, both its front and back, has been progressed through a series of meetings where officers have negotiated improvements to the design. On the front façade, the body of the elevation will be brick, and articulated by a repeating window bay module which gives a horizontal expression to the building, and conceals the retained structural grid behind. The window bay maximises the depth of the façade and uses a large splayed inset panel reveal to the glazing. The window is defined by a projecting double profiled frame and shadow gap. Officers are satisfied that the window module offers enough visual interest for its application across the whole façade. The façade is broken into two "halves" by a slim vertical bay over the entrance to the restaurant. The panel is slightly recessed and uses a change in brick colour and detailing to help break down the length of the long façade.

4.29 Due to issues of overlooking (see below), the middle of the rear façade takes an entirely different expression to the front and is articulated by slim projecting vertical bay boxes which direct views from the hotel rooms away from the school site. These boxes are splayed and fan out symmetrically from the centre of the facade. The rear façade is 'book-ended' by brick to match the front and unite the facades of the building. In order to accommodate additional rooms, the rear of the building had been extended so that above the ground floor the rear façade is cantilevered off the existing face and infills the set-back terrace spaces which currently exist. This, in addition to the two floor roof extension, results in a notable increase to the massing of the rear and an increase in the proximity to the Listed Building behind. Officers consider that while these changes do impact the setting of the Listed Building, they do not cause harm to its significance. The proposals are not considered to harm the special historic interest of the building since they would not impact on any of its significant features or rooms.

+ IMPACT ON HERITAGE ASSETS

4.30 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the principal statutory duties which must be considered in the determination of any

application affecting listed buildings or conservation areas. It is key to the assessment of this application that the decision making process is based on the understanding of specific duties in relation to Listed Buildings and Conservation Areas required by the relevant legislation, particularly the Section 66 and Section 72 duties of the Planning (Listed Buildings and Conservation Areas) Act together with the requirements set out in the NPPF.

4.31 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that: In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Section 72 of the above Act states in relation to Conservation Areas that: In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

4.32 Paragraph 193 of the National Planning Policy Framework states that: When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 196 of the National Planning Policy Framework states that: Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

4.33 The Planning Practice Guidance notes which accompany the NPPF remind us that it is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. Officers agreed areas for assessment with the applicants. Heritage assets were identified within a study area surrounding the site. In the first instance, the assessment to be made is whether the development within the setting of a heritage asset will cause harm to that asset or its setting. If no harm is caused, there is no need to undertake a balancing exercise. If harm would be caused, it is necessary to assess the magnitude of that harm before going to apply the balancing test as set out in paragraphs 195 and 196 of the NPPF as appropriate.

4.34 The site is adjacent to two conservation areas and close to a number of both listed buildings and locally listed Buildings of Merit (BoM). These include;

Conservation Areas:

- Hammersmith Broadway
- Brook Green

Listed Buildings:

- School of the Sacred Heart 208 - 212 Hammersmith Road - Grade II* - the buildings date from 1875 and designed by JF Bentley in a free Tudor style. Most of the buildings on the campus are red brick with stone dressings of three storeys. The chapel in the south-east corner of the site has four pairs of traceried windows with buttresses

between, and a large south window of the same style. The other buildings all have ranges of tall chimney stacks and are linked by a single storey cloister.

- Fire Station 244 Shepherds Bush Road - Grade II - built in 1913 and designed by W E Riley. It remains the dominant building in this part of the street. It is notable for its tall double-height arched openings to the base together with the cobbled run to the front which was designed for the fire engines the base has two flanking "Lutyens-inspired" pavilions.

- Hammersmith Library- Grade II - built in 1905 to the designs of Henry T Hare. It is a symmetrical composition of two storeys in red brick with Portland stone detailing and a slate roof with central cupola. The central range of red brick has an arched stone doorway with an open pediment and rusticated Tuscan columns and is flanked by two small windows with stone pediments and surrounds.

- Police Station 226 Shepherds Bush Road - Grade II - built in 1939 to design of Donald McMorran. It has a sturdy granite base surmounted by light brick facade in a stripped classical style.

- George PH - Grade II - built in 1911 and continues the use of an old coaching inn on this site which has been established here for 400 years. It has a Portland stone façade in Jacobean style with giant order pilasters capped by balustrade and central pediment.

Buildings of Merit:

- The Laurie Arms 238 Shepherds Bush Road - the façade dates back to the 1880s although the pub existed on the site from an earlier date. It is a small two storey building with exuberant detailing.

- 8 Hammersmith Broadway - built in 1887 is a small but quite grandiose commercial building of red brick on a high rusticated stone base. The entrance bay breaks forward and is the focus of a symmetrical composition.

- Broadway Chambers, Hammersmith Broadway - built in 1925 continued the scale of its neighbour [the fire station]. It is a restrained classical six storey commercial building with a steep pantilled roof and pedimented dormer windows.

4.35 Of the heritage assets identified, the main impacts of the proposed development will be experienced as part of the street frontage of the southern end of Shepherds Bush Road as part of the Hammersmith Broad way conservation area and the degree to which the new proposal takes its place in the run of fine individual buildings (identified above) such that their setting is either preserved or enhanced. Similarly, the impact of the additional massing and bulk at the rear on the setting of the listed Sacred Heart School is a primary consideration.

Townscape assessment:

4.36 The photomontage studies submitted by the applicant are from publicly accessible viewpoints around the site where the new development would be seen in its townscape context. Eight view point locations were agreed with the Council. The views tested are either from, or views to conservation areas and include studies which enable an assessment to be made of the impact of the proposed development on the setting of the conservation areas and also listed buildings and non-designated heritage assets. Setting is a much-debated issue. It should be noted that setting is not a heritage asset but can contribute to the significance of heritage assets. The protection of the setting of

heritage assets need not prevent change. What is important is the recognition of, and the response to setting of heritage assets. It is recognised that where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, consideration needs to be given to whether additional change will further detract from or can enhance the significance of the asset.

Views commentary:

4.37 Viewpoint 1, looking south down Shepherds Bush Road from outside the Grade II listed Police Station, shows Brook House in its street context at the south end of Shepherds Bush Road and also in the context of buildings within Hammersmith Broadway. The study shows that the scale and height, while taller than the existing, is commensurate with its neighbours. Importantly, the view shows a consistent parapet height datum which is similar its neighbour to the north.

4.38 Viewpoints 2-6 to the south west, situate the proposals in short to mid-range views looking north east across the junctions of Hammersmith Broadway. These views also demonstrate the consistency of the parapet line which align well with No.10 Hammersmith Broadway. The additional height and mass of the two roof stories is clearly apparent in these studies, especially in the longer-range views where the additional bulk of the new roof in proportion to the body of the existing building, as well as the projecting lift overrun, is visible. However, the proposed mansard profile helps to reduce its visual prominence and create a more subservient top to the building. These views also highlight the improved ground floor frontage and reinstated edge to the street.

4.39 Viewpoint 7 from Bute Gardens looks to the south west across the rear of Sacred Heart School towards the rear of the site. In this view the additional height of the roof stories is apparent however, it is not considered that the roofscape looks incongruous across this context, and would not impact the setting of the school.

4.40 Viewpoint 8 from the corner of Hammersmith Broadway and Hammersmith Road looks to the North West across Sacred Heart School on to the southern elevation of Brook House. Though only a small portion of Brook House would be visible in this view, the view reveals the protruding bulk of the lift overrun and its appearance as an incongruous object in the skyline. Officers have worked with the applicant to reduce the scale of the lift overrun and detail it appropriately to reduce its visual prominence. While still visible, the chamfered edges help to reduce its bulk and prominence in this view.

4.41 Overall, the views studies demonstrate that Brook House would fit comfortably within its street frontage and make a positive contribution to the Hammersmith Broadway Conservation Area opposite by virtue of its improved ground floor and the materiality of the façade. Further, it is not considered that the additional scale and mass of the building would cause harm to surrounding heritage assets, in particular the Grade II listed Sacred Heart School.

Conclusion on design and heritage matters:

4.42 The proposed scheme represents an opportunity to regenerate this part of the town centre. In this respect it meets the aims of Local Plan Policies DC1, DC4 and DC8. Currently, this site presents a poor aspect in the local built environment. Development of this site provides an opportunity for significant enhancement of the area. The scheme

accords with urban design and conservation policies of the council. It would enhance the quality of the townscape in this part of Shepherds Bush Road. Officers have assessed the impact of the proposal on the surrounding heritage assets and concluded that the proposal would not harm their setting. The proposal is compliant with Section 66 and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposal is also in line with national guidance in the NPPF and strategic local policies on the historic environment and urban design.

+ IMPACT ON NEIGHBOURING BUILDINGS

4.43 Separately to the impact on the listed building, concerns were raised by the Sacred Heart School's management about the potential for overlooking from the new hotel rooms into the school's internal and external areas where pupils are present. Whilst it is acknowledged that there is an existing window-to-window relationship between the office building and the school, however the proposed hotel use is considered to be more sensitive in this regard, due to the privacy of the rooms. This matter has been addressed by way of angled "fins" on the rear elevation of the building, which ensures that views from the bedroom windows are directed away from the school at an oblique angle. This is considered to be an acceptable solution that will overcome the issue and the School has confirmed that they do not have any objections.

+ HIGHWAYS MATTERS

4.44 The applicant has provided a Delivery and Servicing Plan (DSP) which sets out the requirements for the proposed development. It is proposed that the development will result in an overall reduction in delivery and servicing trips, attracting 14 servicing trips per week (2 per day). Delivery and servicing would take place to the south of the existing bus stop on Shepherd's Bush Road, as per the existing situation. The proposed development will also be largely operated by one company (Premier Inn) and this will improve the co-ordination and consolidation of delivery and servicing activities on the site. Officers are satisfied that the contents of the submitted DSP will ensure that the delivery and servicing activities of the proposed development can be accommodated without disrupting the local highway network. A condition is recommended to secure compliance with the submitted DSP.

4.45 An outline Travel Plan has been submitted in accordance with Local Plan (2018) Policy T2. A clause within the Section 106 agreement is recommended requiring a fully detailed Travel Plan to be submitted prior to occupation, with a requirement for it to be submitted for monitoring for years 1, 3 and 5.

4.46 22 long-stay cycle parking spaces are to be provided on site in the form of an enclosed vertical cycle store in accordance with London Plan (2016) Policy 6.9 and Policy T3 and Appendix 8 of the Local Plan (2018) which requires 1 long-stay parking space per 20 bedrooms. 1 short-stay cycle parking space is required per 50 bedrooms. In this case, however there are a large number of short-stay cycle hoops directly outside the site on Shepherd's Bush Road which could be used by visitors for short stay use. On this basis, it is considered that cycle parking provision for the new hotel is adequate and no objections are recommended to be raised in terms of Policy T3.

4.47 There is also proposed provision of 6 car parking spaces within the basement car park, of which 4 would be for blue badge holders which is in accordance with the London Plan and LBHF's Local Plan (2018). There are already car parking spaces in

the existing basement space, and the current proposal would represent an overall reduction of car parking on the site.

4.48 With regards to demolition and construction logistics, the proposed development will require delivery of materials and is also located on a busy and sensitive stretch of the public highway. Therefore, consideration must be given to the number/frequency of deliveries, types of construction materials, loading and unloading areas and other aspects of construction which may disrupt the free flow of traffic on the public highway. A condition is attached requiring a detailed Demolition and Construction Logistics Plan to be submitted prior to commencement of the development, in accordance with Local Plan Policy T7.

4.49 The area underneath the arcade on Shepherd's Bush Road is not recorded as highway maintained at the expense of the public, however the highway has been used by the public for a long time. It is expected that the developer will apply for a stopping-up order to remove any existing highways rights prior to carrying out the development.

+ NOISE AND NUISANCE

4.50 Policy CC11 of the Local Plan states that noise-generating development will not be permitted if it would be liable to materially increase the noise experienced by the occupants/ users of existing or proposed noise sensitive uses in the vicinity. In this case, the nearest noise-sensitive premises is the iQ student accommodation on the western side of Shepherd's Bush Road, opposite the site. Given the site's busy town centre location, on an arterial road, no concerns are raised about increased comings and goings to the new hotel. The Council's Public Protection and Safety Team raised no objections to the proposed development subject to conditions; external noise from machinery, anti-vibration mounts, extraction and odour control which are recommended to be attached, in accordance with Local Plan (2018) Policies CC11 and CC13.

+ ENVIRONMENTAL CONSIDERATIONS

+ Flood risk

4.51 The site is within the Environment Agency's Flood Zone 3 which triggers the requirement for a Flood Risk Assessment (FRA). The site is well-protected from flood risk from the Thames. If the flood defences were breached or over-topped, Environment Agency modelling shows that the site is outside the area that would be expected to be impacted by flood water. In terms of surface water flood risks, the site is not in a surface water flooding hotspot and during an extreme rainfall event, surface water would be expected to flow past the site rather than impact on it. The building has an existing basement which will be retained, with some minor alterations for car parking and a plant room. Groundwater and sewer flood risks are low. The proposed ground floor use for restaurant and retail use are less vulnerable to the potential impacts of flooding and the upper floors would not be affected. Given the low risks of flooding on the site, the submitted FRA is considered to be acceptable in terms of showing compliance with Local Plan Policy CC3.

+ Surface water drainage

4.52 A surface water drainage strategy has been outlined in the FRA. This states that no above-ground or prioritised SuDS measures such as infiltration and permeable

paving are possible, but that attenuation storage in conjunction with a controlled discharge of surface water into the combined sewer system will be incorporated. It is accepted that on a site such as this, there are limits to what is possible in terms of SuDS. An acceptable justification has been provided as to why it will not be possible to provide below-ground attenuation or permeable surfaces within the very limited external areas. However, a section of green wall is to be provided and a condition is also recommended requiring details of a green roof on the flat roof of the main building. Officers are satisfied that opportunities for SuDS have been maximised on the site, and no objections are recommended to be raised in terms of Local Plan (2018) Policies CC3 and CC4.

+ Sustainability

4.53 As required, a Sustainability Statement has been provided in the form of a BREEAM pre-assessment report for the entire building. This shows that the proposed development can meet the "very good" BREEAM rating, demonstrating compliance with Local Plan Policy CC2. To demonstrate compliance with Local Plan Policy CC1 on reducing carbon emissions, an Energy Statement has also been provided. This shows that energy efficiency measures and renewable energy generation, in the form of Air Source Pumps will reduce CO₂ emissions by 41.2% compared to the Building Regulations 2013 requirements, which exceeds the minimum 35% reduction target set in the London Plan, in compliance with Local Plan Policy CC1.

+ Air quality

4.54 With regards to air quality, both the construction phase and the operational phase must be considered. The demolition and construction works have the potential to create dust and air quality issues, and therefore appropriate air quality mitigation measures must be implemented for nearby residential receptors. A condition is recommended requiring an Air Quality Dust Management Plan (AQDMP) to be submitted prior to commencement of the development. The AQDMP must comply with the Mayor's Supplementary Planning Guidance on "The Control of Dust and Emissions during Construction and Demolition".

4.55 The applicant has submitted an Air Quality Assessment with the application, dated July 2018 by Air Quality Consultants. Given the site is located within the borough-wide Air Quality Management Area, and is in an area of very poor air quality, Officers did not agree with the conclusion that that no further mitigation is required with regards to ventilation/ exposure. Accordingly, due to the emissions from transportation sources, mitigation will be required in the form of additional ventilation in order to ensure compliance with Local Plan Policy CC10. A condition requiring this has been attached. The proposed green wall on the front elevation would provide some mitigation from vehicle traffic emissions, and a condition is recommended requiring further details to be submitted prior to commencement. Planters or greenery on the main Shepherd's Bush Road frontage itself have been discounted, due to concerns about the practicality of maintenance and obstruction of the public footway.

4.56 With regards to operational building emissions, the proposed energy plant will result in a deterioration in air quality, and further mitigation will be required to make the development acceptable in accordance with Policy CC10. A condition is recommended requiring a report with details of the Ultra-Low NO_x gas-fired boilers and Emergency Diesel Generator units to be submitted prior to occupation of the development.

4.57 There will also be an operational impact from vehicle emissions from the vehicle movements associated with the site, including servicing and delivery vehicle movements. As a result, further mitigation of these elements will be required to make the development acceptable in accordance with Policy CC10. Therefore a condition is recommended requiring a Low Emissions Strategy to be submitted prior to occupation of the development.

+ Land Contamination

4.58 Potentially contaminative land uses are understood to have occurred at, or near to, this site. Therefore, the council's land contamination officers recommend that the standard suite of conditions is attached to ensure that no unacceptable risks are caused to humans, controlled waters, or the wider environment during and following the development works, in accordance with Policy CC9 of the Local Plan (2018).

5.0 HEADS OF TERMS S106/278

5.1 The proposed Heads of Terms within the Section 106 legal agreement may be summarised as follows:

(1) Development to be coach-free, for example no guests or visitors to be dropped off/picked up by coaches stopping outside the site;

(2) A Jobs, Employment and Business Strategy (JEBS) to be produced and agreed with the Council prior to the commencement of the development, and a financial contribution of £72,875 towards supporting paid work experience and paid apprenticeships during the construction of the development.

(3) Submission of a Travel Plan and requirement for the Travel plan to be submitted for monitoring by the council at the end of Years 1, 3 and 5 with a fee of £3,000 per review.

6.0 CONCLUSIONS AND RECOMMENDATION

6.1 The proposal is considered to be acceptable in land use terms, in its design and appearance, in its limited impact on traffic generation and parking, having a satisfactory relationship to surrounding buildings and residential properties that would contribute to the range and quality of visitor accommodation on offer in Hammersmith Town Centre whilst preserving the setting of the adjacent conservation area and nearby Listed Buildings and Buildings of Merit.

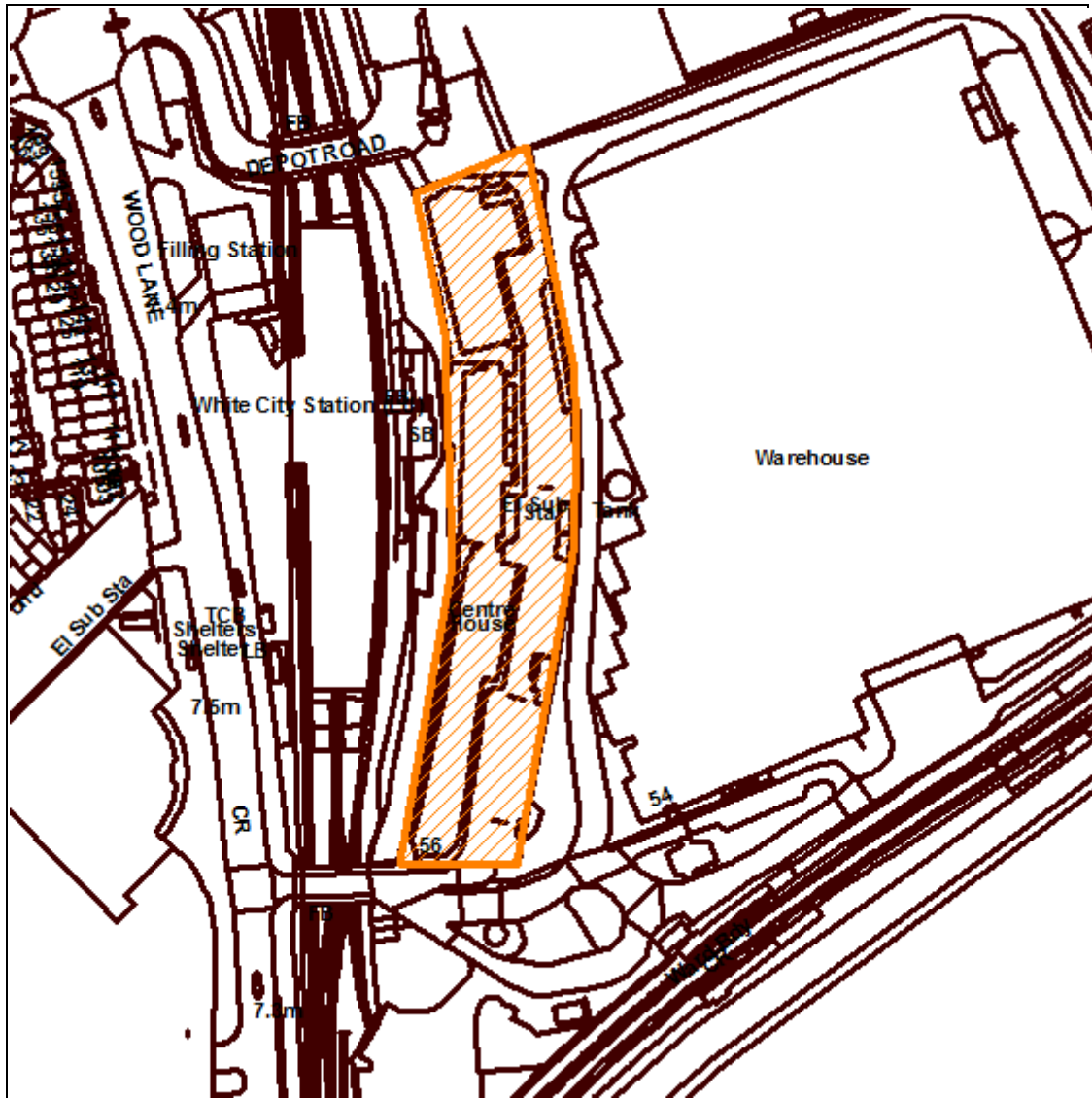
6.2 As such it is recommended that planning permission for the proposed development be granted, subject to conditions and a legal agreement.

Agenda Item 5

Ward: College Park And Old Oak

Site Address:

Centre House 56 Wood Lane London W12 7SB



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Hammersmith and Fulham LA100019223 (2013).
For identification purposes only - do not scale.

Reg. No:
2018/03058/FUL

Case Officer:
Mr Neil Button

Date Valid:
04.10.2018

Conservation Area:
Constraint Name: Wood Lane Conservation Area -
Number 42

Committee Date:
02.04.2019

Applicant:

St James Group Ltd
C/o Agent

Description:

Detailed planning application for demolition of all buildings on site, and erection of two buildings with basement level, comprising 1 x part 11/ part 22 storey building and 1 x part 11/part 32 storey building to provide 527 residential units with ancillary residential facilities (C3); 1,350 sq m (GEA) of flexible commercial, community and leisure floorspace (A1-A3, B1, D1-D2); means of access, public realm, amenity space, landscaping, and other associated infrastructure works including creation of basement level access to the adjoining White City Living site and works to the site's western boundary.

Drg Nos: See Condition 2

Application Type:

Full Detailed Planning Application

Officer Recommendation:

1) Subject to there being no contrary direction from the Mayor for London that the Committee resolve that the Strategic Director, Growth and Place be authorised to determine the application and grant permission upon the completion of a satisfactory legal agreement and subject to the conditions listed below;

2) To authorise the Director for Strategic Director, Growth and Place in consultation with the Director of Law and the Chair of the Planning and Development Control Committee to make any minor modifications to the proposed conditions or heads of terms or any subsequent minor changes arising out of detailed negotiations with the applicant which may necessitate the modification, which may include the variation, addition or deletion of the conditions and heads of terms as drafted to ensure consistency between the two sets of provisions.

1) Time Limit

The development hereby permitted shall be begun not later than the expiration of 3 years beginning with the date of this (full planning) permission

Reason: Condition required to be imposed by Section 91(1) (a) of the Town and Country Planning Act 1990 (as amended by section 51 of the Planning and Compulsory Purchase Act 2004).

2) Approved Plans

The planning permission shall not be constructed unless in accordance with the approved drawings marked.

1515-PP-00-DR-a-02-0100 P37

1515-PP-01-DR-a-02-0101 P37

1515-PP-02-DR-a-02-0102 P37

1515-PP-03-DR-a-02-0103 P37
1515-PP-04-DR-a-02-0104 P37
1515-PP-05-DR-a-02-0105 P37
1515-PP-06-DR-a-02-0106 P37
1515-PP-99-DR-a-02-0099 P37
1515-PP-00-DR-a-10-0100 P37
1515-PP-01-DR-a-10-0101 P37
1515-PP-08-DR-a-10-0108 P37
1515-PP-10-DR-a-10-0110 P37
1515-PP-11-DR-a-10-0111 P37
1515-PP-12-DR-a-10-0112 P37
1515-PP-13-DR-a-10-0113 P37
1515-PP-20-DR-a-10-0120 P37
1515-PP-21-DR-a-10-0121 P37
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1515-PP-30-DR-a-10-0130 P37
1515-PP-31-DR-a-10-0131 P37
1515-PP-32-DR-a-10-0132 P37
1515-PP-99-DR-a-10-0099 P37
1515-PP-98-DR-a-10-0098 P37
1515-PP-XX-DR-a-11-0001 P37
1515-PP-XX-DR-a-11-0002 P37
1515-PP-XX-DR-a-11-0003 P37
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1515-PP-XX-DR-a-12-0007 P37
1515-PP-XX-DR-a-15-3001 P37
1515-PP-XX-DR-a-15-3002 P37
1515-PP-XX-DR-a-15-3003 P37
1515-PP-XX-DR-a-15-3004 P37

Design and Access Statement by Pilbrow and Partners (August 2018)
Access Statement by Pilbrow and Partners (November 2018)
Environmental Statement Volumes 1, 2 and 3 and Non-Technical Summary
(August 2018)

Reason: To ensure full compliance with the planning application hereby approved and to prevent harm arising through deviations from the approved plans, in accordance with the NPPF 2018, Policies 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8, 7.9 and 7.21 of the London Plan 2016 and Policies WCRA, DC1, DC2, DC3 and DC8 of the Local Plan 2018.

3) Approved Flexible Uses

Notwithstanding the information in the approved plans and subject to the provisions within the relevant conditions set out in this planning permission, the following land uses are permitted within the specified floorspace on the ground floor in the south and north blocks:

Class A1 (retail)

Class A2 (Financial and Professional Institution)

Class A3 (restaurant)

Class A4 (Bar)

Class A5 (Hot food Take-away)

Class B1 (Business)

Class D1 (Non-Residential Institution)

Class D2 (Leisure)

As set out in Class E, Part 3, schedule 2 of the General Permitted Development Order 2015 or the provisions of the relevant Class/Part upon implementation, this permission benefits from a period during which changes of use of the above specified floorspace between uses A1, A2, A3, A4, A5, B1, D1 or D2 as set out in the description of development may take place without the need for further planning permissions. This flexibility is for a period of ten years from the date of the approval.

Reason: To ensure the uses are compatible with the adjoining land uses, within the White City Opportunity/Regeneration Area and to ensure that the amenity of occupiers residing in surrounding residential properties would be safeguarded in accordance with policies WCRA, WCRA1 and DC1, E1, TLC1, TLC5, TLC5 and HO11 of the Local Plan 2018.

4) Preliminary Risk Assessment

No part of the development shall commence, save for any approved Enabling Works, until a preliminary risk assessment report in connection with land contamination, is submitted to and approved in writing by the Council. This report shall comprise: a desktop study which identifies all current and previous uses at the site and surrounding area as well as the potential contaminants associated with those uses; a site reconnaissance; and a conceptual model indicating potential pollutant linkages between sources, pathways and receptors, including those in the surrounding area and those planned at the site; and a qualitative risk assessment of any potentially unacceptable risks arising from the identified pollutant linkages to human health, controlled waters and the wider environment including ecological receptors and building materials. All works must be carried out in compliance with and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Reason: To ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with policy 5.21 of The London Plan 2016 and policies CC5, CC8 and CC9 of the Local Plan 2018.

5) Site Investigation

No part of the development shall commence, save for any approved Enabling Works until a site investigation scheme, in connection with condition 4, is submitted to and approved in writing by the Council. This scheme shall be based upon and target the risks identified in the approved preliminary risk assessment and shall provide provisions for, where relevant, the sampling of soil, soil vapour, ground gas, surface and groundwater. All works must be carried out in compliance with and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling

Reason: To ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with policy 5.21 of The London Plan 2016, policy CC5, CC8 and CC9 of the Local Plan 2018.

6) Qualitative Risk Assessment

No part of development shall commence, save for any approved Enabling Works or (unless the Council agree in writing that a set extent of development must commence to enable compliance with this condition) until, following a site investigation undertaken in compliance with the approved site investigation scheme as part of condition 5, a quantitative risk assessment report is submitted to and approved in writing by the Council. This report shall assess the degree and nature of any contamination identified on the site through the site investigation; include a revised conceptual site model from the preliminary risk assessment based on the information gathered through the site investigation to confirm the existence of any remaining pollutant linkages and determine the risks posed by any contamination to human health, controlled waters and the wider environment. All works must be carried out in compliance with and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Reason: To ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with policy 5.21 of The London Plan 2016, policy CC5, CC8 and CC9 of the Local Plan 2018

7) Remediation Method Statement

No part of development shall commence, save for any approved Enabling Works or (unless the Council agree in writing that a set extent of development must commence to enable compliance with this condition) until, a remediation method statement, in connection with condition 6, is submitted to and approved in writing by the Council. This statement shall detail any required remediation works and shall be designed to mitigate any remaining risks identified in the approved quantitative risk assessment. All works must be carried out in compliance with and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Reason: To ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with policy 5.21 of The London Plan 2016, policy CC8 and CC9 of the Local Plan 2018.

8) Verification Report

Prior to the commencement of above ground works, save for any approved Enabling Works or (unless the Council agree in writing that a set extent of development must commence to enable compliance with this condition) until the approved remediation method statement in connection with condition 7 has been carried out in full and a verification report confirming these works has been submitted to, and approved in writing, by the Council. This report shall include: details of the remediation works carried out; results of any verification sampling, testing or monitoring including the analysis of any imported soil; all waste management documentation showing the classification of waste, its treatment, movement and disposal; and the validation of gas membrane placement (if required). If, during development, contamination not previously identified is found to be present at the site, the Council is to be informed immediately and no further development (unless otherwise agreed in writing by the Council) shall be carried out until a report indicating the nature of the contamination and how it is to be dealt with is submitted to, and agreed in writing by, the Council. Any required remediation shall be detailed in an amendment to the remediation statement and verification of these works included in the verification report. All works must be carried out in compliance with and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Reason: To ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with policy 5.21 of The London Plan 2016, policy CC5, CC8 and CC9 of the Local Plan 2018.

9) Long Term Monitoring Strategy

No part of the development shall commence, save for any approved Enabling Works or (unless the Council agree in writing that a set extent of development must commence to enable compliance with this condition) until an onward long-term monitoring methodology report, in connection with condition 8, is submitted to and approved in writing by the Council where further monitoring is required past the completion of development works to verify the success of the remediation undertaken. A verification report of these monitoring works shall then be submitted to and approved in writing by the Council when it may be demonstrated that no residual adverse risks exist. All works must be carried out in compliance with and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Reason: To ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in

accordance with policy 5.21 of the London Plan (2016), policy CC5, CC8 and CC9 of the Local Plan 2018.

10) Impact Piling

No impact piling shall take place on the site until a piling method statement detailing the type of piling to be undertaken and the methodology by which such piling will be carried out to facilitate the Development (or development on adjoining land/sites), including measures to prevent and minimise the potential for damage to subsurface water or sewerage infrastructure, or the Underground lines and associated embankment and programme for the works has been submitted to and approved in writing by the local planning authority in consultation with the relevant water or sewerage undertaker. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: To prevent any potential to impact on local underground water and sewerage utility infrastructure, in accordance with Policies 5.14 and 5.15 of the London Plan (2016), policy CC2 and CC5 of the Local Plan 2018.

11) Infrastructure Protection

The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for each stage of the development for all of the demolition, foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

- provide details on all structures
- provide details on the use of tall plant/scaffolding
- accommodate the location of the existing London Underground structures
- there should be no opening windows or balconies facing the LU elevation
- demonstrate access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering the London Underground land
- demonstrate that there will at no time be any potential security risk to the railway, property or structures
- accommodate ground movement arising from the construction thereof
- mitigate the effects of noise and vibration arising from the adjoining operations within the structures

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2015 Table 6.1, draft London Plan policy T3.

12) Demolition Logistic Plan

Prior to commencement of demolition works a Demolition Logistic Plan shall be submitted to and approved in writing by the Local Planning Authority. The Demolition Logistic Plan shall include specific details for;

- a) a Demolition Waste and Material Management, Transportation and Disposal Strategy, including delivery booking and vehicle holding arrangements, steps to be taken to re-use and recycle waste, waste classification and disposal procedures and locations; targets and arrangements for maximising use of the river;
- b) Traffic and Transport Demolition Mitigation Measures as identified in Chapter of the Environment Statement;
- c) Demolition Phasing and Timing;
- d) Demolition Traffic routing through the area and an enforcement system for breach of its provisions, the employment and deployment of banksmen, HGV movement profiling to show that peak period are avoided (0700-1000 and 1600-1900), the appointed freight contractor is a member of the Freight Operating Recognition System (FORS) and appropriate signage is implemented in and around the site to denote that demolition activities are underway;
- e) a low emission strategy for construction traffic and machinery;
- f) monitoring and control measures for dust, noise, vibration, lighting and working hours,
- g) measures proposed to prevent the passage of mud and dirt onto the highway by vehicles entering and leaving the site in connection with the demolition and construction processes;
- h) the Demolition Logistic Plan should be supported by scaled traffic Management drawings with signage in compliance with Chapter 8 of Traffic Signs Manual for temporary works together with scaled swept path drawings. The Traffic Management drawings should show how pedestrians would be managed safely within close proximity of the works.
- i) advance notification to neighbours and other interested parties of proposed works and public display of contact details including accessible phone contact to persons responsible for the site works for the duration of the works.

All construction and demolition works shall be carried out in accordance with the approved details

Reason: To ensure that occupiers of surrounding premises are not adversely affected by noise, vibration, dust, lighting or other emissions from the building site in accordance with Policies 5.18, 5.19, 5.20, 5.21, 5.22 and 7.14 of the London Plan, and Policies DC1, DC2, CC6, CC7, CC10, CC11, and CC12 of the Local Plan 2018.

13) Construction Management Plan

Prior to the commencement of development, a Construction Management Plan shall be submitted to and approved in writing by the Council. Details shall include control measures for dust, noise, vibration, lighting, delivery locations, restriction of hours of work and all associated activities audible beyond the site boundary to 0800-1800hrs Mondays to Fridays and 0800-1300hrs on Saturdays, advance notification to neighbours and other interested parties of proposed works and

public display of contact details including accessible phone contact to persons responsible for the site works for the duration of the works. The construction management plan should be prepared in consultation with London Underground which includes the details for all of the relevant foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent). The details shall be implemented in accordance with the approved plan throughout the project period.

Reason: To ensure that occupiers of surrounding premises are not adversely affected by noise, vibration, dust, lighting or other emissions from the building site in accordance with policies 5.18, 5.19, 5.20, 5.21 and 5.22 of the London Plan (2016), policies DC2, CC6, CC10, CC11, CC12 of the Local Plan 2018.

14) Construction Logistics Plans

Prior to the commencement of development, a Construction Logistics Management Plan for the whole development shall be submitted to and approved in writing by the Council. The method statement /construction management plan should be prepared in consultation with London Underground which includes the details for all of the relevant foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent). The development shall be carried out in accordance with the approved Construction Logistics Management Plan. Each Construction Logistics Management Plan shall cover the following minimum requirements:

- site logistics and operations;
- construction vehicle routing;
- contact details for site managers and details of management lines of reporting;
- detailed plan showing different phasing, different developers and constructors to be updated on a 6-monthly basis;
- location of site offices, ancillary buildings, plant, wheel-washing facilities, stacking bays and car parking;
- storage of any skips, oil and chemical storage etc.; and
- access and egress points;
- membership of the Considerate Contractors Scheme.

Reason: To ensure that no unacceptable adverse effect on the amenity of surrounding occupiers in accordance with policies DC1, T1, T2, DC2, CC6, CC10, CC8 and CC12 of Local Plan 2018.

15) Material Samples

Prior to the commencement of any part of the Development extending above ground level details and samples of materials, paint colours, stonework, or relevant part thereof on all external faces and roofs of the buildings shall be submitted to and approved in writing by the Local Planning Authority and no part of the Development or relevant part thereof shall be used or occupied prior to the implementation of the approved details. The development shall be carried out in accordance with such details as have been approved.

Reason: To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, in accordance with policies DC1 of the Core Strategy DC2, DC3, DC7 and DC8 of the Local Plan 2018.

16) Section Drawings

Prior to the commencement of the relevant part of the facades of the Development the details including detailed drawings in section and elevation at 1:20 and samples for the relevant part of development thereof to show details of any proposed cladding, fenestration, glazing, balconies and terraces shall be submitted and approved in writing by the Local Planning Authority. The development shall be carried out prior to first occupation in accordance with the approved details.

Reason: To ensure a satisfactory external appearance, in accordance with policies DC2 and DC8 of the Local Plan 2018.

17) External Surface Materials

Prior to the commencement of works relating to the laying out of ground surface treatment, details including detailed drawings in plan, section and elevation at 1:20 and samples, where appropriate, of all paving and external hard surfaces, boundary walls, railings, gates, fences and other means of enclosure for the development shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details prior to first occupation and thereafter permanently retained.

Reason: To ensure a satisfactory external appearance, in accordance with policies DC1, DC2 and DC8 of the Local Plan 2018.

18) Soft and Hard Landscaping

Prior to the commencement of works relating to the external public realm and rear courtyard as specified in the approved plans, details of the proposed hard and soft landscaping, associated with the Development, including planting schedules and details of the species, height and maturity of any trees and shrubs and proposed landscape maintenance and management shall be submitted to the local planning authority and approved in writing. The approved scheme(s) shall be implemented in the next winter planting season following completion of the building works, or before the occupation and use of any part of the buildings within the development, whichever is the earlier. The landscaping shall thereafter be retained and maintained in accordance with the approved details.

Reason: To ensure a satisfactory external appearance in accordance with policies DC1, OS1 DC2, OS4 and OS5 of the Local Plan 2018.

19) Street Furniture

Details including the locations of the benches, litter bins and signage shall be submitted to and approved in writing by the local planning authority, prior to occupation of the relevant Development Plot. The street furniture listed above shall be designed and sited to be fully inclusive and accessible for all users and

will not provide any obstruction to disabled persons or people of impaired mobility and/or sight. The relevant development plot shall not be open to users until the benches, litter bins and signage as approved have been provided, and must be permanently retained thereafter.

Reason: To ensure the satisfactory provision of facilities, in accordance with policy OS1 of the Core Strategy 2011 and policies OS2 and OS3 of the Local Plan 2018 and to ensure the development is fully inclusive and accessible for all users, in accordance with Policy 3.1 and 7.2 of the London Plan 2016, and the Council's "Planning Guidance" Supplementary Planning Document.

20) Play Equipment

Prior to first occupation of the development, a scheme detailing the play equipment of the outdoor play spaces, for that part of the development shall be submitted to the local planning authority and approved in writing. Any play equipment will be designed to be fully inclusive to ensure the play areas are accessible to all and will be implemented in accordance with the approved plans, to be permanently retained thereafter.

Reasons: In order to ensure equal life chances for all, and to prevent groups such as blind people and disabled children being excluded from use of public realm and other amenities by designs failing in detail to take specific needs into account, in accordance with policy 3.1 of the London Plan (2016), policies OS1, OS2 and OS3 of the Local Plan (2018), the Council's "Planning Guidance" Supplementary Planning Document, and any other relevant best practice guidance (including the Councils We Want to Play Too 2012).

21) Sustainable Urban Drainage System/Surface Water Drainage Scheme

Prior to commencement of works, details of the Sustainable Urban Drainage System (SUDS), Surface Water Drainage Plan and a Whole Life Management and Maintenance Scheme for these measures shall be submitted to and approved in writing by the Local Planning Authority. The SUDS scheme shall be designed to include measures prioritised by the London Plan Drainage Hierarchy such as the provision of green and brown roofs rainwater harvesting specifications and provisions, attenuation storage tanks with an attenuation minimum volume of 536 sqm and controlled flow rates in accordance with the Flood Risk Assessment by Buro Happold (dated September 2019), the Surface Water Drainage Strategy Note by Buro Happold (dated 19th December) and the SUDS Management and Maintenance scheme (Annex D) dated 20/12/2018. The SUDS and Surface Water Drainage measures and Whole Life Management and Maintenance Scheme shall be implemented in accordance with the approved details prior to first occupation of the development hereby permitted, and will thereafter be permanently retained and maintained.

Reason: To ensure that surface water run-off is managed in a sustainable manner, in accordance with policy 5.13 of the London Plan (2016) and policy CC3 of the Local Plan 2018.

22) Green and Brown Roofs

Prior to the commencement of work on the relevant part of the buildings hereby approved, details of green/brown roofs, including planting and maintenance schedules, and ecological enhancement measures for the development shall be submitted to and approved in writing by the Local Planning Authority. The green and brown roofs shall be provided in an area of no less than 170 sqm (brown roof) and 480 sqm (green roof) and the details shall provide evidence of whether an additional 100 sqm of green roof could be provided within the roof spaces. The green and brown roofs shall be laid out on the relevant building, prior to first occupation within the relevant building in accordance with the details as approved. The green and brown roof shall be permanently retained thereafter.

Reason: To ensure the provision of green and brown roofs in the interests of sustainable urban drainage and habitat provision, in accordance with policies 5.11, 5.13 and 7.19 of the London Plan 2016 and policies OS1, CC1, CC5, OS4, OS5, CC2 and OS5 of Local Plan 2018.

23) Refuse Storage, Collection and Recycling

Prior to the commencement of any above ground works on the buildings hereby permitted, details of the refuse arrangements including storage, collection and recycling for all uses within each building shall be submitted to and approved in writing by the Council. The approved details shall be implemented prior to the use or occupation of any part of the relevant building and shall be permanently retained for this purpose thereafter.

Reason: To ensure the satisfactory provision for refuse storage and recycling in accordance with policy CC6 of the Local Plan 2018.

24) Sound Insulation (rooms in adjoining dwellings)

Prior to commencement of works on any relevant part(s) of the development, details shall be submitted to and approved in writing by the Council, of an enhanced sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/ uses in adjoining dwellings. The approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site/ adjacent dwellings/ noise sensitive premises is not adversely affected by noise, in accordance with Policies CC11 and CC13 of the Local Plan 2018.

25) Noise Levels (Internal and External Criteria)

The noise level in all residential rooms at the development hereby approved shall meet the noise standard specified in BS8233:2014 for internal rooms and external amenity areas.

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise, in accordance with Policies CC11 and CC13 of the Local Plan 2018

26) Sound Insulation (between Commercial and noise sensitive premises)

Prior to commencement of works on any relevant part(s) of the development, details shall be submitted to and approved in writing by the Council, of the sound insulation of the floor/ ceiling/ walls separating the commercial part(s) of the premises from dwellings. Details shall demonstrate that the sound insulation value $D_{nT,w}$ is enhanced above the Building Regulations value and, where necessary, additional mitigation measures are implemented to contain commercial noise within the commercial premises and to achieve the criteria of BS8233:2014 within the dwellings/ noise sensitive premises. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site is not adversely

27) Separation of communal facilities/plant etc noise from sensitive premises

Prior to commencement of works on any relevant part(s) of the development, details shall be submitted to and approved in writing by the Council, of the sound insulation of the floor/ ceiling/ walls separating the basement plant room(s), basement car park and communal facilities from dwellings. Details shall demonstrate that the sound insulation value $D_{nT,w}$ is enhanced above the Building Regulations value and, where necessary, additional mitigation measures implemented to contain commercial noise within the commercial premises and to achieve the criteria $L_{Amax,F}$ of BS8233:2014 within the dwellings/ noise sensitive premises. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise, in accordance with Policies CC11 and CC13 of the Local Plan 2018.

28) External noise from machinery

Prior to commencement of works on any relevant part(s) of the development, details shall be submitted to and approved in writing by the Council, of the external sound level emitted from plant/ machinery/ equipment and mitigation measures as appropriate. The measures shall ensure that the external sound level emitted from plant, machinery/ equipment will be lower than the lowest existing background sound level by at least 10dBA in order to prevent any adverse impact. The assessment shall be made in accordance with BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity. A post installation noise assessment shall be carried out where required to confirm compliance with the sound criteria and additional steps to mitigate noise shall be taken, as necessary. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise, in accordance with Policies CC11 and CC13 of the Local Plan 2018.

29) Anti-vibration measures

Prior to commencement of works on any relevant part(s) of the development, details of anti-vibration measures shall be submitted to and approved in writing by the Council. The measures shall ensure that machinery, plant/ equipment, extract/ ventilation system and ducting are mounted with proprietary anti-vibration isolators and fan motors are vibration isolated from the casing and adequately silenced. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise, in accordance with Policies CC11 and CC13 of the Local Plan 2018.

30) Servicing Management Plan

Prior to first occupation of the relevant part of the development, a Servicing Management Plan shall be submitted to and approved in writing by the Council. Details shall include times and frequency of deliveries and collections, vehicle movements, silent reversing methods, location of loading bays, quiet loading/unloading measures, etc. The development shall be carried out in accordance with the approved details, for the duration of the occupation of the development thereafter.

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise, in accordance with Policies CC11 and CC13 of the Local Plan 2018.

31) Odour Abatement and Extract System

Prior to use of the specified floorspace on the ground floor in the south and north blocks for Class A3 (restaurant/cafe) purposes, details shall be submitted to and approved in writing by the Council, of the installation, operation, and maintenance of the odour abatement equipment and extract system, including the height of the extract duct and vertical discharge outlet, in accordance with the 'Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems' January 2005 by DEFRA. Approved details shall be implemented prior to the commencement of the use and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise or odours, in accordance with Policies CC11 and CC13 of the Local Plan 2018

32) Floodlights, Security lights and Decorative External Lighting

Prior to the installation of any external artificial lighting, within the relevant part of the development, details of external artificial lighting shall be submitted to and approved in writing by the Council. Lighting contours shall be submitted to

demonstrate that the vertical illumination of neighbouring premises is in accordance with the recommendations of the Institution of Lighting Professionals in the 'Guidance Notes for the Reduction of Light Pollution 2011'. Details should also be submitted for approval of measures to minimise use of lighting and prevent glare and sky glow by correctly using, locating, aiming and shielding luminaires. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

To ensure that the amenity of occupiers of surrounding premises is not adversely affected by lighting, in accordance with Policy CC12 of the Local Plan 2018.

33) Air Quality: Combustion Plant compliance with Emission Standards

Prior to occupation of the development hereby permitted a report with details of the combustion Plant to mitigate the impact of air pollution shall be submitted to and approved in writing by the Council. The report shall include the following:

- a. Details to demonstrate that the termination height of the shared Flue stack for the combustion plant has been installed a minimum of 3 metres above any openable window and/or roof level amenity area and meet the overriding minimum requirements for Chimney heights of the third edition of the 1956 Clean Air Act memorandum
- b. Details to demonstrate that all the CHP Plant and Ultra Low NOx Gas fired boilers, and associated abatement technologies shall comply and improve upon the minimum dry NOx emissions standard of 95mg/Nm³ (at 5% O₂), 40 mg/kWh (at 0% O₂) respectively.
- c. Details of emissions certificates, and the results of NOx emissions testing of each CHP, and Ultra Low NOx gas boiler by an accredited laboratory shall be provided following installation and thereafter on an annual basis to verify compliance of the relevant emissions standards in part b). Where any combustion based energy plant does not meet the relevant emissions Standards in part b) above, it should not be operated without the fitting of suitable secondary NOx abatement Equipment or technology as determined by a specialist to ensure comparable emissions.

Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

Reason: To ensure the development's air pollution impacts are mitigated in accordance with policy CC10 of the Local Plan 2018, the requirements of the NPPF (2018) and Policies 7.14a-c of the London Plan (2016).

34) Low Emissions Strategy

Prior to occupation of the development hereby permitted a Low Emission Strategy report to mitigate the impact of air pollution for the operational phase shall be submitted to and approved in writing by the Council. The Low Emission Strategy must detail the remedial action and mitigation measures that will be implemented to protect receptors (e.g. abatement technology for energy plant, design

solutions). This Strategy must make a commitment to implement the mitigation measures (including NOx emissions standards for the chosen energy plant) that are required to reduce the exposure of future residents to poor air quality and to help mitigate the development's air pollution impacts, in particular the emissions of NOx and particulates from on-site and off-site transport via a Ultra Low Emission Vehicle Plan (ULEVP) e.g. use of on-road Ultra Low Emission Vehicles in accordance with the emissions hierarchy (1) Cargo bike (2) Electric Vehicle), (3) Hybrid (non-plug in) Electric Vehicle (HEV), (4) Plug-in Hybrid Electric Vehicle (PHEV), (5) Alternative Fuel e.g. CNG, LPG, and energy generation sources. Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

Reason: To ensure the development's air pollution impacts are mitigated in accordance with the requirements of NPPF (2018), Policy 7.14 of the London Plan (2016), policy CC10 of the Local Plan 2018.

35) Air Quality Dust Management Plan

Prior to the commencement of each of the demolition and construction phases of the development hereby permitted, an Air Quality Dust Management Plan (AQDMP) to mitigate the impact of air pollution shall be submitted to and approved in writing by the council. The AQDMP must include an Air Quality Dust Risk Assessment (AQDRA) that considers sensitive receptors on-site and off-site of the development and is undertaken in compliance with the methodology contained within Chapter 4 of the Mayor of London 'The Control of Dust and Emissions during Construction and Demolition', SPG, July 2014 and the identified measures recommended for inclusion into the AQDMP. The AQDMP submitted must comply with the Mayor's SPG and should include: Inventory and Timetable of dust generating activities during demolition and construction; Site Specific Dust mitigation and Emission control measures in the table format as contained within Appendix 7 of Mayor's SPG including for on-road and off-road construction traffic; Detailed list of Non-Road Mobile Machinery (NRMM) used on the site. The NRMM should meet as minimum the Stage IV emission criteria of Directive 97/68/EC and its subsequent amendments. This will apply to both variable and constant speed engines for both NOx and PM. An inventory of all NRMM must be registered on the NRMM register <https://nrmm.london/user-nrmm/register>; Ultra Low Emission Vehicle Strategy (ULEVS) for the use of on-road Ultra Low Emission Vehicles in accordance with the emission hierarchy (1) Electric (2) Hybrid (Electric-Petrol) (3) Petrol, (4) Hybrid (Electric-Diesel) (5) Diesel (Euro 6 & Euro VI); Details of Air quality monitoring of PM10 where appropriate and used to prevent levels exceeding predetermined Air Quality threshold trigger levels. Developers must ensure that on-site contractors follow best practicable means to minimise dust and emissions at all times. Approved details shall be fully implemented and permanently retained and maintained during the demolition and construction phases of the development.

Reason: To ensure the development's air pollution impacts are mitigated in accordance with the requirements of the NPPF (2018), Policies 7.14a-c of the London Plan (2016) and Policy CC10 of the Local Plan (2018).

36) Microclimate Mitigation Scheme

Prior to commencement of works above ground level, details of micro climate mitigation measures necessary to provide an appropriate wind environment throughout and surrounding the development shall be submitted to and approved in writing by the Council. Approved details shall be implemented, and permanently retained thereafter.

Reason: To ensure that suitable measures are incorporated to mitigate potential adverse wind environments arising from the development, in accordance with policies 7.6 and 7.7 of the London Plan (2016) and policies DC3 and CC2 of the Local Plan (2018).

37) Sustainability

Prior to commencement of development (excluding Demolition, Ground and Enabling Works), a Sustainability Statement and a BREEAM New Construction pre-assessment shall be submitted to and approved in writing by the Local Planning Authority to confirm the sustainable design and construction measures to be integrated in the Development. The associated BREEAM ratings for the flexible ground floor spaces within the south block and any other non-residential uses should achieve the "Very Good" rating as minimum, except in relation to Water which shall achieve the equivalent of BREEAM Excellent.

In the interests of energy conservation, reduction of CO2 emissions and wider sustainability, in accordance with Policies 5.1, 5.2, 5.3, 5.6 and 5.7 of the London Plan and Policies CC1, CC2 of the Local Plan 2018.

38) BREEAM Certificates

Prior to handover of any non-residential component of the development, a BREEAM (2014) certificate confirming that sustainability performance (Very Good ratings) had been achieved as proposed shall be submitted to and approved in writing by the Local Planning Authority. Supporting information shall also be submitted for approval to demonstrate that the non-residential components meet the minimum sustainable design and construction standards of the London Plan.

In the interests of energy conservation, reduction of CO2 emissions and wider sustainability, in accordance with Policies 5.1, 5.2, 5.3, 5.6 and 5.7 of the London Plan and Policies CC1, CC2 of the Local Plan 2018.

39) Energy Strategy

The proposed energy efficiency and low carbon measures incorporated within the development shall be carried out in accordance with the Energy Statement dated July 2018 (by Hodkinson) which calculates the reduction in annual CO2 emissions to 379 tonnes corresponding to a reduction across the site of 36.3%. No part of the Development shall be used or first occupied (other than for construction purposes) until it has been carried out in accordance with the approved details and shall be retained for the lifetime of the development.

Reason: In the interests of energy conservation and reduction of CO2 emissions, in accordance with Policies 5.1, 5.2, 5.3, 5.6 and 5.7 of the London Plan, Policy CC1 of the Local Plan 2018.

40) Energy Statement Compliance (Residential)

Within 3 months of final occupation of the residential dwellings within a Development Plot, evidence shall be submitted that the energy statements approved pursuant to Condition 39 above have been implemented in accordance with the approved details.

Reason: In the interests of energy conservation and reduction of CO2 emissions, in accordance with Policies 5.1, 5.2, 5.3, 5.6 and 5.7 of the London Plan, Policy CC1 of the Local Plan 2018.

41) Energy Statement Compliance (Non-residential)

Within 3 months of final occupation of the non-residential units within a Development Plot, evidence shall be submitted that the energy statements approved pursuant to Condition 39 above have been implemented in accordance with the approved details.

In the interests of energy conservation and reduction of CO2 emissions, in accordance with Policies 5.1, 5.2, 5.3, 5.6 and 5.7 of the London Plan, Policy CC1 of the Local Plan 2018

42) Bicycle Storage

No residential or commercial units shall be occupied in the relevant building until the residential bicycle storage areas are provided and are fully fitted out to provide 915 spaces in total, plus 22 secure commercial cycle parking spaces. 58 short stay cycle parking for both the residential and commercial uses will also be provided within the development's landscaped areas in accordance with the approved plans, prior to occupation within the relevant building. The cycle parking facilities shall thereafter be retained and not used for any other purpose without the prior written consent of the Council.

Reason: To ensure the suitable provision of cycle parking within the Development to meet the needs of future site occupiers and users and in the interest of the appearance of the development, in accordance with Policies 6.9 and 6.13 of the London Plan (2016) and Table 6.3 of the London Plan (2016) and policy T1 of the Local Plan 2018.

43) Delivery and Servicing Plan

Prior to first occupation of any residential or commercial use within the relevant building, a site servicing strategy or Delivery and Servicing Plan(DSP), including vehicle tracking, for the relevant building shall be submitted to and approved in writing by the Council. The DSP shall detail the management of deliveries, emergency access, collection of waste and recyclables, times and frequencies of deliveries and collections/ silent reversing methods/ location of loading bays and vehicle movement in respect of the relevant building. The approved measures shall be implemented prior to first occupation (of the relevant building) and

thereafter retained for the lifetime of the residential or commercial uses in the relevant part of the site.

Reason: In order to ensure that satisfactory provision is made for refuse storage and collection and to ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by noise, in accordance with Policy 6.11 of the London Plan (2016), policyCC1 of the Local Plan 2018 and the Council's Supplementary Planning Document 'Storage of Refuse and Recyclables'.

44) Blue Badge Holder Vehicles

Prior to first occupation of the relevant building, a scheme which demonstrates how daytime deliveries and stopping by Blue Badge Holder vehicles and taxis outside buildings on the site will be managed, in the absence of kerbs and vehicular entries into the envelopes of individual buildings pull-ins, in such a way as to avert the risk of blind people colliding with stopped vehicles shall be submitted to and approved in writing by the local planning authority. The scheme shall be implemented in accordance with the approved details prior to first occupation of the relevant part of the development.

Reason: To ensure that deliveries and dropping off can occur without compromising highway safety or the safety of pedestrians on the footway, in accordance with policy 7.2 of the London Plan (2016), policy T1 and T5 of the Local Plan 2018 and the Council's "Planning Guidance" Supplementary Planning Document.

45) Secure by Design

Prior to first occupation of the relevant building, a statement of how "Secured by Design" requirements are to be adequately achieved for that part of development, shall be submitted to and approved in writing by the Local Planning Authority. The approved secure by design measures shall be implemented in accordance with the approved statement prior to occupation of the relevant part of the development hereby approved.

Reason: To ensure a safe and secure environment in accordance with policy 7.3 of the London Plan (2016), policies DC1 and DC2 of the Local Plan 2018.

46) Trees Replanted

Any tree or shrub planted pursuant to approved landscape details that is removed or severely damaged, dying or becoming seriously diseased within 5 years of planting shall be replaced with a new tree or shrub of similar size and species to that originally required to be planted.

Reason: To ensure a satisfactory provision for planting, in accordance with policy 7.21 of the London Plan (2016), policies OS1 and OS2 of the Local Plan 2018.

47) Tree Works to BS

Any works to tree(s) on the site shall be carried out only in the following manner, in accordance with British Standard 3998:1989 - Recommendations for Tree Work:

Reason: To ensure that the Council is able to properly assess the impact of the development on any trees and to prevent their unnecessary loss, in accordance with policy 7.21 of the London Plan (2016), policies OS1, OS2 and OS4 of the Local Plan 2016.

48) Wheelchair User Flats and Accessible

a) 10% (53) of the total residential units as identified in the approved plans and Design and Access Statement shall be provided to meet Building Regulation requirement M4(3) or adaptable to this standard and retained as such.

b) All other remaining (474) residential units hereby approved for the remainder of the site shall be provided to meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings'.

Reason: To ensure that the development provides for the changing circumstances of occupiers and responds to the needs of people with disabilities, in accordance with policy 3.8 of the London Plan (2016), policies H05 and H06 of the Local Plan 2018 and the Council's Planning Guidance Supplementary Planning Document (2018).

49) No Mirrored Glass on shopfront

The window glass of any shopfront hereby approved shall be clear and shall not be mirrored, tinted or otherwise obscured and shall be permanently retained as such.

Reason: To ensure a satisfactory external appearance and to prevent harm to the street scene, in accordance with policies DC1, DC5 and TLC2 Local Plan 2018.

50) Level Accesses

The ground floor entrance doors to all publicly accessible parts of the buildings and integral lift/stair cores shall not be less than 1 metre wide and the threshold shall be at the same level to the path fronting the entrance to ensure level access.

Reason: In order to ensure the development provides ease of access for all users, in accordance with Policy 3.1 and 7.2 of the London Plan (2016), and the Council's adopted supplementary planning document.

51) No roller shutters

No roller shutters shall be installed on any shopfront, commercial entrance or display facade hereby approved.

Reason: To ensure a satisfactory external appearance and to prevent harm to the street scene, in accordance with policies DC5 and TLC2 of the Local Plan 2018 and "Planning Guidance" Supplementary Planning Document 2018.

52) No advertisements

No advertisements shall be displayed on or within any elevation of the buildings, forecourt or public spaces without details of the advertisements having first been submitted to and agreed in writing by the Council.

Reason: In order that any advertisements displayed on the building are assessed in the context of an overall strategy, so as to ensure a satisfactory external appearance and to preserve the integrity of the design of the building, in accordance with policies DC1 and DC9 of Local Plan 2018.

53) No Telecommunications Equipment

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking or re-enacting that Order with or without modification), no aerials, antennae, satellite dishes or related telecommunications equipment shall be erected on any part of the development hereby permitted, without planning permission first being obtained.

Reason: To ensure that the visual impact of telecommunication equipment can be considered in accordance with policy DC1 of the Local Plan 2018.

54) No other alterations to the buildings

No alterations shall be carried out to the external appearance of the development hereby approved, including the installation of air conditioning units, water tanks, ventilation fans or extraction equipment, not shown on the approved drawings.

Reason: To ensure a satisfactory external appearance and prevent harm to the street scene, and to safeguard the amenities of neighbouring residential occupiers, in accordance with policies DC1 and policy DC4 of the Local Plan 2018 and "Planning Guidance" Supplementary Planning Document 2018.

55) Hours of Operation

With the exception of the Class A4 use, the Class A, B and D uses hereby permitted shall operate only between 0700 hours and 2400 hours, on weekdays and on Saturdays and on 0700 hours to 2300 hours on Sundays and Bank Holidays.

Reason: To ensure that the amenities of surrounding occupiers are not unduly affected by noise and other disturbance, in accordance with policy CC11 of the Local Plan 2018.

56) Outdoor Seating to A3 Uses

Any outdoor seating areas in connection with the ground floor flexible use floorspace hereby approved shall operate within the following hours only:

- Monday to Saturday: 0700 to 2200 hours
- Sunday and Public Holidays 0700 to 2200 hours

The outdoor seating areas will be closed outside of these hours and any temporary seats/tables shall be removed and stored internally within the unit(s).

Reason: To ensure that the development does not result in conditions prejudicial to the amenities of local residents by reason of noise and disturbance in accordance with policies TLC5 and policy CC11 of the Local Plan 2018.

57) Car Park Management Plan

Prior to first occupation of any of the residential parts of the building(s), a car parking management plan for the development shall be submitted to and approved in writing by the Council detailing the allocation of car parking spaces to occupiers within the development. The Car Park Management Plan shall be carried out in accordance with the approved details.

Reason: To ensure the appropriate distribution of specialist parking in the development and that all spaces can be readily accessed by vehicles, in accordance with policies 6.13 and 7.2 of the London Plan (2016) and policies T1 and T4 of the Local Plan 20160.

58) Window Cleaning Equipment

Prior to first use or first occupation of the development within a Development Plot hereby permitted, details of the proposed window cleaning equipment shall be submitted and approved in writing by the Local Planning Authority. The details shall include the appearance, means of operation and storage of the cleaning equipment. No part of that Development Plot shall be used or occupied until the equipment has been installed in accordance with the approved details and shall thereafter be retained for the lifetime of the development in this form.

Reason: To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, in accordance with Policies 7.1 and 7.6 of the London Plan, and Policies DC1 and DC8 of the Local Plan 2018.

59) Lifts

Prior to first occupation of each building hereby permitted, details of fire rated lifts in each of the buildings submitted to and approved in writing by the Local Planning Authority. Details shall include loading lifts to the basement levels and the measures to ensure that at least one lift per core will operate at all times and that no wheelchair occupiers are trapped if a lift breaks down. The fire rated lifts shall be installed as approved and maintained in full working order for the lifetime of the development.

Reason: To ensure that the development provides for the changing circumstances of occupiers and responds to the needs of people with disabilities, in accordance with Policies 3.8 and 7.2 of the London Plan, and Policies DC1 and HO6 of the Local Plan 2018.

60) Fire Safety

The development shall be implemented in accordance with the fire safety principles set out in the Fire Safety measures set out in the Design and Access Statement by Pilbrow and Partners (August 2018).

To ensure that the Development contributes to the minimisation of potential fire risk, in accordance with the Policy 7.13 of the London Plan.

61) Water Network Upgrades/Phasing

No properties shall be occupied until confirmation has been provided that either:-

- all combined water network upgrades required to accommodate the additional flows from the development have been completed; or
- a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied.

Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

Reason - The development may lead to sewage flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development in accordance with Policy CC3, CC4 and CC5 of the Local Plan (2018).

62) Prior to commencement of works on the basement level, details of the structural water-proofing measures of the basement and lower ground floor levels shall be submitted to and approved in writing by the Local Planning Authority. The water-proofing measures shall be designed to prevent water penetration post construction, and these measures shall be implemented in accordance with the approved details, prior to occupation of the development hereby permitted, and will thereafter be permanently retained and maintained.

Reason: To ensure that the development is adequately safeguarded against flooding in accordance with policy 5.13 of the London Plan (2016) and policy CC3 of the Local Plan 2018 and the NPPF (2019).

1) Principle of Development/Regeneration: The principle of a residential led mixed use redevelopment of the site including residential with flexible ground floor (retail/restaurant/café/ office/community or leisure) uses is considered to be acceptable and in accordance with national, strategic and local planning policies, which advocate making the most efficient use of brownfield land in sustainable locations. The proposals are considered to make an important contribution towards meeting local and strategic housing needs within the Borough and London and would also create a vibrant and creative place with a stimulating and high-quality environment where people will want to live, work, shop and spend their leisure time. The proposed development would contribute to the regeneration of the area by completing the urban block at the western edges of

the White City Living development and provide a high quality architectural response to a challenging and constrained site which will open up linkages to the adjoining development (safeguard potential linkages to the west to Wood Lane via White City Station) and facilitate improved circulation within the area. The relatively small size and location of the proposed flexible retail and leisure uses would not compromise the vitality or viability of surrounding centres. The proposed development would contain appropriate land uses that are compatible with the White City Regeneration Area which is well served and accessible by public transport. The proposed development is therefore considered acceptable and in accordance with policies 2.13, 2.15, 3.3, 3.4 of the London Plan (2016) and policies WCRA, WCRA1, DC1, DC2 and DC3 of the Local Plan (2018) and White City Opportunity Area Planning Framework (2013).

Housing: The proposed development is considered to make a significant contribution towards providing much needed additional housing in accordance with London Plan Policies 3.3B, 3.3D and 3.3E and would help the borough meet and exceed its housing targets in accordance with Table 3.1 of the London Plan. It is considered that the development would contribute towards the indicative housing targets set out in Policy HO1 of the Local Plan (2018) which promotes the development of new housing within the Strategic policies WCRA and WCRA1 for developments within the White City Opportunity Area which set an increased indicative housing target of 6,000 homes proposed across the plan period. The principle and density of residential development proposed is considered acceptable and would be in accordance with London Plan Policies 3.3 and 3.4 and Local Plan policies WCRA, WCRA1, HO1, HO3, HO4 and HO5. The proposed development would comprise an appropriate mix of dwelling sizes that would meet local and London-wide housing needs and is therefore considered to be in accordance with policy 3.8 of the London Plan (2016) and Local Plan policy HO5. In the context of these policies and having regard to the Viability Assessment, the individual circumstances of the site and the planning and regeneration benefits arising from the development, it is considered that the provision of key worker affordable housing with Imperial College having first option in terms of nominations is acceptable, subject to a legal agreement which secures a mechanism which permits the conversion (of key worker units) to other affordable housing tenures compatible with local affordability levels, in order to safeguard the affordability of the units in perpetuity, in the event there is no take-up for ICL key workers, in lieu of a review mechanism. The proposals would therefore, be in accordance with Policies 3.8, 3.10, 3.11 and 3.12 of the London Plan (2016), policies HO1, HO3, HO4, HO5, H11, WCRA and WCRA1 of the Local Plan (2018) and the Council's Planning Guidance Supplementary Planning Document and White City Opportunity Area Planning Framework (2013).

Design: The proposed development would complete the urban block at the western edges of the White City Living development and provide a high quality architectural response to a challenging and constrained site which will open up linkages to the adjoining development, safeguard potential linkages to the west to Wood Lane via White City Station and facilitate improved circulation within the area. There would be no adverse impact on the surrounding built environment which includes the Wood Lane Conservation Area and Grade II listed Television Centre building and adjoining sites which are subject to redevelopment and regeneration. The scale and massing of the proposed development are considered to meet the policy requirements in delivering buildings with good

quality architecture which optimises the residential capacity of the site which improves connectivity and movement within the area. The proposed development would not prejudice the development potential of the adjoining development sites, subject to conditions. Specifically, the distribution of scale, massing and height of the taller elements has been demonstrated to have minimal townscape, heritage and visual amenity impacts on the local and wider context. When considered alongside the significant planning benefits in terms of housing provision and new public realm included as part of the development, the proposals, on balance, are in general accordance with local plan strategic policies WCRA and WCRA1 which promote regeneration in this part of the Borough. Although the proposed development will be visible and will have an impact on views from within LBHF it is considered that the impact would result in no harm to conservation areas or local townscape and the proposed development would have a positive impact on the skyline of this part of White City. The proposed development is therefore considered acceptable in accordance with policies 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8 and 7.21 of the London Plan (2016), Local Plan policies WCRA, WCRA1, DC1, DC2, DC3 and DC8 and the Council's Planning Guidance Supplementary Planning Document and White City Opportunity Area Planning Framework (2013).

Built Heritage: The proposed development responds positively to the townscape setting by the virtue of the crescent form of the architecture which emphasises the curvilinear shape of the site and by virtue of the appropriate shoulder height of the buildings which respects the setting of the emerging development to the east and the height and form of the heritage assets in proximity to the development, without appearing overly assertive or dominant. The tallest elements are positioned in the centre of the site which are sufficiently distant from the Grade II listed Television Centre which preserves its setting. It is considered that the proposed development, would cause no harm to the character or appearance of the conservation area and setting of the nearby listed and locally listed buildings. In coming to a view on the heritage impacts, officers have given due regard in any case, to the significant townscape, urban design and regeneration benefits of the proposals. The impact of the proposal, on the historic significance, visual amenity, character and appearance of these areas, in particular Wood Lane Conservation Area and setting of the Grade II listed buildings and locally listed buildings in the area, is considered acceptable. The proposed development is therefore considered to be acceptable and would be in accordance with policies 7.4, 7.7 and 7.8 of the London Plan (2016), Local Plan policies WCRA, WCRA1, DC1, DC2, DC3 and DC8 and the Council's Planning Guidance Supplementary Planning Document and White City Opportunity Area Planning Framework (2013).

Residential Amenity: It is considered that the proposed development, would not result in significant harm to the amenities of adjoining occupiers in terms of daylight/sunlight, over-shadowing, and privacy. It is considered that the proposals, have been designed so that they do not unduly prejudice the development potential of the adjoining sites, including the adjoining White City Living development which have the capacity to contribute towards the comprehensive regeneration of the Opportunity Area, by virtue of the extent of the daylight, sunlight, overshadowing and privacy impacts. Potential impacts in terms of air quality, light pollution, solar glare, wind tunnelling, noise or TV/radio reception would be acceptable, subject to the various mitigation methods proposed which are secured by conditions. In this regard, the development would respect the principles of good neighbourliness. The proposed development is therefore

considered to be acceptable and would be in accordance with policies 3.5, 3.6, 3.8, 7.3, 7.6, 7.7, 7.14 and 7.15 of the London Plan (2016), Local Plan policies HO11, DC1, DC2 and DC3 and the Council's Planning Guidance Supplementary Planning Document and White City Opportunity Area Planning Framework (2013).

Access: Subject to conditions, and continued consultation with local access groups, it is considered that the development, as amended, would provide a safe and secure environment for all users. The development is therefore considered to be acceptable in accordance with Policies 3.8, 6.12 and 7.2 of the London Plan (2016) policy HO6 of the Local Plan 2018 and the Council's "Planning Guidance" Supplementary Planning Document.

Quality of Residential Accommodation: Notwithstanding the instances whereby the residential accommodation at the lower floors, falls short of standards set out in the planning guidance in terms of providing sufficient levels of daylight and sunlight, it is considered that, on balance the development would provide an acceptable standard of accommodation for future occupiers of the residential accommodation (private and affordable) in respect of the living space, aspect and amenity, for a scheme which is located within a high density urban context that is envisaged to optimise development capacity. The assessment confirms that the majority of the proposed units would benefit from acceptable levels of daylight/sunlight, outlook and privacy. The development is therefore considered, on balance, to be acceptable in accordance with Policies 3.5 and 3.8 of the London Plan (2016), Policies HO4, HO11, DC1, DC2 and CC11 of the Local Plan (2018) and the Council's "Planning Guidance" Supplementary Planning Document and White City Opportunity Area Planning Framework (2013).

Highways: It is considered that the overall traffic impact of the proposed development would be acceptable and in accordance with Local Plan policy T1. The level of car, motorcycle and cycle parking is assessed as being acceptable in accordance with Local Plan policy T3 and the Council's "Planning Guidance" Supplementary Planning Document. The site is highly accessible and well served by public transport. The proposed development would enhance pedestrian and cycle linkages to the development sites to the north and south and to the Wood Lane from the proposed space between the north and south buildings creates an opportunity to establish a new east-west pedestrian/cycle route through the strategic site. Such improvements would be the benefit of the wider White City Opportunity/Regeneration Area. It is considered that any impacts arising from the development would be mitigated by conditions and s106 provision to contribute towards sustainable transport infrastructure measures within the White City Opportunity/Regeneration Area and prevent significant increase in on-street parking pressures in surrounding roads. A car park management, servicing, road safety and travel planning initiatives would be implemented in and around the site to mitigate against potential adverse impacts. The proposed development is therefore considered acceptable in accordance with policies 6.1, 6.3, 6.9, 6.10, 6.11, 6.13 and Table 6.3 of the London Plan (2016), policies T1, T2, T3, T4 and T7 of the Local Plan and the Council's "Planning Guidance" Supplementary Planning Document and White City Opportunity Area Planning Framework (2013).

Sustainability: The proposed development can be designed to meet a high standard of sustainable construction. The proposed energy strategy includes a connection to the provision for a decentralised energy centre within phase 1 of the

White City Living development, which incrementally becomes active as both developments are constructed. The proposed energy centre (within the adjoining development site) would provide the heating and hot water requirements for the development through Gas fired CHP units. The development will contribute towards further CO2 reductions through façade design and the incorporation of green and brown roofs to supplement the provision of gas fired CHP units as appropriate to their carbon reduction target and energy profile. This will result in a significant reduction of CO2 emissions beyond the Building Regulations 2010 compliant level. Subject to conditions, and s106 off-setting contribution which would enable compliance with the London Plan targets, the proposed development is therefore considered to be acceptable and would be in accordance with policies 5.1, 5.2, 5.3, 5.6, 5.7, 5.8, 5.9, 5.11, 5.12, 5.13, 5.14, 5.15, and 7.19 of the London Plan (2016), and would broadly comply with with the intent of policies CC1, CC2, CC3, CC4, CC6, CC9 and CC10 of the Local Plan and the Council's Planning Guidance Supplementary Planning Document and White City Opportunity Area Planning Framework (2013).

Flood Risk: The site is located in flood zone 1 (low risk). A Flood Risk Assessment (FRA) has been submitted which advises standard construction practices in order to ensure the risk of flooding at the site remains low. The development would therefore be acceptable and in accordance with Policies 5.12 and 5.13 of the London Plan (2016), policies CC2, CC3 and CC4 of the Local Plan and the Council's Planning Guidance Supplementary Planning Document.

Environmental Impacts: All Environmental Impacts have been assessed with regards to construction, demolition, proposed development and alternatives, Noise, Air Quality, Ecology, Transport, Socio-economics, Archaeology, Sunlight, Daylight, Overshadowing, Solar Glare, Water Resources and Flood, Waste, Ground Contamination, Microclimate, Electronic Interference, Townscape and Heritage, Cumulative and Residual Impacts, some of which are set out in the Environmental Statement (dated 2018), in accordance with the EIA Regulations 2011 (as amended). The Environmental Statement which comprises the ES (and appendices), together with the consultation responses received from statutory consultees and other stakeholders and parties, enable the Council to determine this application with knowledge of the likely significant environmental impacts of the proposed development.

Legal Agreement: The application proposes that its impacts are mitigated by way of a comprehensive package of planning obligations to fund improvements that are necessary as a consequence of the increased use arising from the population yield from the development and additional new land uses. The financial contributions will go towards the enhanced provision of education, health, employment, community facilities, accessibility and sustainable transport, highways (including pedestrian and cycle routes) and the public realm. The proposed development would therefore mitigate external impacts and would accord with London Plan (2016) policy 8.2, Policy WCRA and WCRA1 of the Local Plan and the White City Opportunity Area Planning Framework (2013).

All Background Papers held by Andrew Marshall (Ext: 4841):

Application form received: 17th September 2018

Drawing Nos: see above

Policy documents: National Planning Policy Framework (NPPF) 2019
The London Plan 2016
LBHF - Local Plan 2018
LBHF – Planning Guidance Supplementary Planning Document
2018

Consultation Comments:

Comments from:	Dated:
Greater London Authority - Planning Decisions Unit	06.03.19
Transport For London - Land Use Planning Team	05.02.19
Thames Water - Development Control	30.10.18
Historic England London Region	15.10.18
Historic England London Region	13.12.18

Neighbour Comments:

Letters from:	Dated:
CAA House 45-59 Kigsway London WC2B 6TE	15.10.18
41 Pankhurst House Du Cane Road London W12 0UJ	01.12.18
Flat 50 Cranston Court 56 Bloemfontein Road London W12 7FF	15.10.18
119 Wood Lane London W12 7ED	11.11.18
117 wood lane w12 7ed london 7ed	02.01.19

1.0 BACKGROUND

- 1.1 This application is seeking full planning permission for demolition of all buildings on site, and erection of two buildings with basement level, comprising 1 x part 11/part 22 storey building and 1 x part 11/part 32 storey building to provide 527 residential units with ancillary residential facilities (C3); 1,350 sq m (GEA) of flexible commercial, community and leisure floorspace (A1-A3, B1, D1-D2); means of access, public realm, amenity space, landscaping, and other associated infrastructure works including creation of basement level access to the adjoining White City Living site and works to the site's western boundary.
- 1.2 The site is located within the White City Regeneration Area (WCRA) designated in the Local Plan (2018) and within the White City Opportunity Area (WCOA) as designated in the London Plan (2016). Specifically, the site is identified within 'White City East', where development proposals are required by the Local Plan Policy WCRA1 to provide capacity for many of the 6,000 new homes (the target set for the Regeneration Area). These new homes are needed for residents across a variety of tenures, house sizes and affordability, whilst ensuring that development provides high quality places for living and working that are well integrated with, and respect the setting of, the surrounding area.
- 1.3 The proposal provides 527 residential units with a range of studio, one, two and three bed apartments. 35% of the residential accommodation (by both habitable room and unit number) will be intermediate rent affordable housing and is to be designated for employees of Imperial College London. At ground floor level flexible commercial, community and leisure floorspace is proposed which will activate the development's frontage, whilst creating active surveillance.
- 1.4 The proposal involves the demolition of existing commercial buildings, which are of mid and late C20 construction. The buildings are at the end of their lifespan and are of low architectural quality. They are considered to appear out of place in proximity to the carefully planned new development taking place in the area and are in need of redevelopment.
- 1.5 The application site's proportions and gently curved profile provide the opportunity to create buildings which are defined by a grand, sweeping crescent form of development. The proposed development consists of a southern and northern building which together form a curved eleven storey podium, with two centrally located slender, taller buildings rising from the podium.
- 1.6 The proposals make provision for a new east-west pedestrian route in between the two buildings which will mark the new connection into the White City Living (WCL) development and its new, expansive world class public open space directly to the east.
- 1.7 The new development will have a close relationship with Phases 1 and 2 of WCL development also being developed by the same applicant. The proposed development will serve to complete the urban block created by the first two WCL phases. Within the urban block, gardens and child play areas will be shared between the two developments. Disabled car parking will also be provided within the WCL basement, with internal access into the Centre House development provided.

- 1.8 The proposed development also provides a pedestrian linkage to Imperial College proposed White City campus which is located to the north of the site. A new pedestrian walkway along the west of site is anticipated to receive footfall from pedestrians travelling both north to the WCL development and onwards to Imperial College's proposed new campus, or south towards transport connections or Westfield shopping centre's extensions.
- 1.9 Overall, the proposal provides an exceptional quality development that optimises the site's potential for housing. The development would integrate successfully into the evolving fabric of the area, regenerating the site and area to a quality befitting its inner London location.

2.0 SITE DESCRIPTION

The Site

- 2.1 Centre House (the site) is situated east of Wood Lane between White City Station and the former M&S Warehouse site which is currently being redeveloped by the St James Group (the same applicant as for this planning application) with a residential-led scheme known as White City Living (WCL). WCL will deliver 1,845 residential units, commercial floorspace at ground floor levels and Exhibition Park, a publicly accessible linear park running from Wood Lane into the heart of the site.
- 2.2 The site is located within the London Borough of Hammersmith and Fulham (LBHF), and within a part of central London which has been designated as the White City Opportunity Area (WCOA) in the London Plan and White City Regeneration Area (WCRA) in LBHF's Local Plan (2018). The White City Opportunity Area Planning Framework (WCOAPF 2013) identifies the site within the White City East Area; within which residential-led mixed used developments are encouraged. The WCOAPF identifies that the site is an appropriate location for a tall building.
- 2.3 The LBHF Local Plan (2018) identifies that the WCRA as a whole (including the site) has the potential to deliver a minimum of 6,000 homes and 10,000 new jobs through redevelopment proposals. The Draft London Plan (2017) includes an updated target capacity for the WCOA, which increases the expected delivery to 7,000 new homes.
- 2.4 Currently the site comprises four x 4-6 storey office buildings (Class B1) known as Centre House with 55 associated rear car parking spaces at surface level. The mid and late C20 buildings are of low architectural quality. The site is located within the Wood Lane Conservation Area; which was designated by LBHF in 1991, principally to protect the Grade II Listed BBC Television Centre which is located to the West of the site. The Wood Lane Conservation Area Statement identifies the buildings as having a neutral contribution to the Conservation Area.
- 2.5 The site is currently owned by Imperial College London. The applicant, St James has an agreement to purchase the property once planning permission is granted so that they can undertake the redevelopment proposals. The buildings on the site are currently in Class B1 use, and provide space for a range of businesses across 10,315 sq m.

- 2.6 The Central Line and White City Underground Station run directly to the west of the site and its boundary spans the length of the site, although at present there is no access to the station from the east of the site.
- 2.7 The site is located within Flood Risk Zone 1 and is located within an Air Quality Management Area (as is the whole Borough of Hammersmith and Fulham). The site does not contain any listed buildings or any nationally designated heritage assets such as scheduled monuments or registered parks and gardens and is not within an Archaeological Priority Area nor is it affected by any strategic views. The site is also affected by Aerodrome safeguarding of Heathrow 150m and Northolt 91.4m.

Surrounding Area

- 2.8 The surrounding area comprises a mix of commercial, retail and residential uses. The area is undergoing significant change as a consequence of the WCOA/WCRA designation. Major planning permissions have been granted for the BBC Television Centre site to the west, the Westfield site to the south, the Imperial College sites to the north and the WCL site directly to the east. More detail of these permissions is provided within the Planning History section of this report.
- 2.9 To the east of the Site is a multi-phased residential-led scheme known as WCL. The site is under construction and is also being developed by St James (the applicant for this planning application).
- 2.10 The WCL site originally benefited from Outline Planning Permission (ref: 2014/04726/OUT) for a residential led mixed use development from 11-30 storeys to provide for up to 1,465 residential homes and up to 1,995 sq m of commercial use and associated public realm, parking and infrastructure works.
- 2.11 A variation to the original planning permission (ref: 2017/04377/VAR) was granted in June 2018 and permitted an increase of 337 residential homes, followed by a further subsequent S96A Non-Material Amendment application (Ref: 2018/02116/NMAT) meaning that the development will now provide 1,845 units across the site. Given that both the WCL and Centre House sites are under the same ownership and adjoin each other they will share some linkages. For instance, amenity and child play areas will be shared between the two developments. Disabled car parking provision for Centre House will be provided within the WCL basement, with internal basement level access created between the sites.
- 2.12 Immediately to the north of the site is the Former Dairy Crest site, which will form part of Imperial's new White City campus. An outline application (2018/00267/OUT) for the development of the site was submitted to LBHF in 2018 and is currently under determination. These proposals comprise 6-13 storey buildings for academic research and development, offices and other business uses, as well as up to 373 residential units in buildings up to 18-32 storeys and an eight-storey hotel.
- 2.13 In addition, a planning application for a 10-year meanwhile use (known as Scale Space), providing circa 25,500 sq m of flexible office space on the Dairy Crest site was approved by LBHF in March 2018 (2017/04276/FUL). This development

provides office floorspace which is suitable for SME's for the next 10 years whilst construction on the White City campus is underway.

- 2.14 The area to the west of Wood Lane was once dominated by the BBC with the iconic former Television Centre, which is Grade II listed, lying to the south west of the application site. Stanhope has undertaken redevelopment of the Television Centre providing circa 943 residential homes and 6,182 sq m of business floor space, as well as a mix of retail, community and leisure uses. The redevelopment also included the modernisation of the television studios which the BBC has now returned to. The core part of the Television Centre has been retained and residential homes have been created within the Helios, overlooking the Television Centre's central courtyard.
- 2.15 Further to the east of the site and beyond WCL is the A3320, a major multi-lane highway set at an elevated level for much of its length. This acts as a major physical barrier between the areas either side of it. The area to the east of the A3320 is largely occupied by commercial and residential buildings and lies within the Royal Borough of Kensington and Chelsea.
- 2.16 Further to the south of the site is Westfield Shopping Centre. Westfield Ltd received outline planning permission for a large retail/leisure extension, with up to 1,347 residential dwellings on land to the north of the existing shopping centre in November 2013. This 75,019 sq m retail extension to the shopping centre opened earlier this year.
- 2.17 The site is highly accessible, which is reflected in its Public Transport Accessibility Level (PTAL) of 6a. White City Bus Station with numerous bus services is located to the south of the site. White City London Underground Station is located approximately 280m from the site, whilst Wood Lane London Underground Station is located approximately 250m south of the site. White City Station is served by the Central Line, whilst Wood Lane Station is served by Circle and Hammersmith and City Lines.
- 2.18 Shepherd's Bush Station is also located approximately 800m to the south of the site and provides links to destinations such as Milton Keynes Central and Willesden Junction to the north and Clapham Junction and Croydon South to the south and Stratford to the east.
- 2.19 A Santander Cycle Hire Docking Station is located approximately 200m to the south of the site.

3.0 PLANNING HISTORY

- 3.1 The application site's planning history involves a number of minor planning applications associated with the existing office use (Class B1) of the site. These applications, generally relating to signage, antennas, air condenser units and standby generators for the office occupiers are of little relevance in the determination of this planning application.
- 3.2 The following references list recent planning applications and permissions for large scale redevelopments of neighbouring sites within the WCOA/WCRA:

White City Living (Former M&S Warehouse Site)

- 3.3 Ref: 2014/04726/OUT. White City Living (Former M&S Site): Planning application (part detailed/part outline) for the demolition of all existing buildings and structures and the redevelopment of the site for residential and mixed uses comprising the erection of new buildings ranging from 11 to 30 storeys to provide up to 1,465 residential units (Class C3) and use classes (A1-A5, B1, D1 & D2), the provision of a new publicly accessible open space, new pedestrian and vehicle routes, accesses and amenity areas, basement level car park with integral servicing areas and other associated works: Approved 16th December 2015
- 3.4 Ref: 2017/04377/VAR. White City Living (Former M&S Site) Variation to conditions 1-8 of planning permission 2016/03907/VAR (for the comprehensive phased redevelopment of the site for a residential-led mixed-use development) granted 23/05/2017 in order to permit minor material amendments to the outline form of development. Amendments comprise modifications to the approved Parameters Plans and Development Specification and Parameters Report that cover design alterations to Development Plots B1 (varying the horizontal parameters (to -0.92m to +27.98m) to permit an extended southern building line), Development Plots D1 and E1 (varying parameters to extend the maximum heights by an additional +2.31m and 8.86m), Development Plots D2, D3 and E2 (varying parameters to extend maximum heights by an additional +4.79m) and incorporating a new additional Development Plot E3 (to comprise residential use within a new building up to 74.45m in height). The specified amendments would facilitate the optimisation of residential units to increase the overall maximum unit numbers from 1,477 to 1,814 units including the provision of an additional 118 affordable units (35% of the additional units). Approved 3rd July 2018
- 3.5 Ref: 2018/02116/NMAT: Non Material Amendment to Planning Permission (Ref: 2017/04377/VAR dated 25/06/2018) seeking to change the mix and number of dwellings in Phase 1 and provision of additional residential dwelling no.s within Phases 2 and 3 of the comprehensive redevelopment of the former M&S Warehouse Site; including variation of condition 3 (amended drawing numbers) and condition 7 (no. of dwellings) to permit up to 1845 residential units (an additional 31 x units) under s96A (3) of the Town and Country Planning Act (1990) as amended. Approved 21/08/2018
- 3.6 Phase 1B: Ref: 2016/03650/RES: Submission of reserved matters (access, appearance, landscaping, layout and scale) for the Decking over the Central Line cutting (Phase 1B) in connection with planning permission ref: 2014/04726/OUT for the redevelopment of the former M&S Warehouse Site granted 16th December 2015 – Approved 09/11/2016
- 3.7 Phase 1C: Ref: 2017/03358/RES: Submission of Reserved Matters Application to discharge access, appearance, landscaping, layout, and scale pursuant to Condition 1 for the land identified as Exhibition Green within the masterplan for the M&S Site redevelopment, pursuant to Outline Planning Permission reference 2014/04726/OUT, approved on 16th December 2015 – Approved 13/03/2018
- 3.8 Phase 2: Ref: 2017/04567/RES: Submission of reserved matters application dealing with all reserved matters including access, appearance, landscaping, layout and scale in respect of Development Plot B1 (erection of 13-27 storey

building with basement level providing 416 affordable homes (including 80 x Extra Care Units) and 952 sqm (GEA) commercial floorspace with associated external amenity space, public realm, car and cycle parking and other works) pursuant to planning application 2017/04377/VAR (for the comprehensive residential led mixed use redevelopment of the former M&S Warehouse Site in White City) (first application for RMA for phase 2) – Approved 10/07/2018

- 3.9 Phase 1E: 2017/04823/RES: Reserved Matters Application to discharge access, appearance, landscaping, layout, and scale pursuant to Condition 1 for the land identified as Kiralfy Square within the masterplan for the M&S Site redevelopment, pursuant to Outline Planning Permission reference 2014/04726/OU3358T, approved on 16th December 2015 – Approved 04/06/2018.
- 3.10 Phase 1E: 2017/04827/RES: Reserved Matters Application to discharge access, appearance, landscaping, layout, and scale pursuant to Condition 1 for the land identified as Spring Garden within the masterplan for the M&S Site redevelopment, pursuant to Outline Planning Permission reference 2014/04726/OUT, approved on 16th December 2015. Approved 04/06/2018
- 3.11 Phase 2: 2018/02377/RES: Submission of (a second) reserved matters application (for Phase 2) dealing with all reserved matters including access, appearance, landscaping, layout and scale in respect of Development Plot B1 comprising the erection of 13-27 storey building with basement level providing 427 affordable homes (additional 11 new affordable homes) (including 60 x Extra Care Units) and 1,027 sqm (GEA) flexible commercial floorspace (Use Classes A1/A2/A3/A4/A5/B1/D1 or D2) with associated external amenity space, public realm, car and cycle parking and other works) pursuant to planning application 2017/04377/VAR (for the comprehensive residential led mixed use redevelopment of the former M&S Warehouse Site in White City). Approved 18/10/2018
- 3.12 Phase 1C: 2018/02768/RES Submission of reserved matters for access, appearance, landscaping, layout, and scale pursuant to Condition 1 for the land identified as Exhibition Park within the masterplan for the M&S Site redevelopment, pursuant to Outline Planning Permission ref: 2017/04377/VAR (second RMA for phase 1C) – Approved 22/01/201

Former BBC Television Centre:

- 3.13 Ref: 2015/02646/VAR (Original ref. 2014/02531/COMB) The proposed development consists of eight plots, comprising up to 943 residential units, 6,182sqm of B1 floorspace, 2,490sqm of C1 floorspace, 573 car spaces; and 1,960 cycle spaces. The application includes a tall building of 25 storeys on Block G, which lies directly to the west of Wood Lane. Approved 16th December 2015

The former Dairy Crest Site - to the north of the application site

- 3.14 Ref: 2017/04276/FUL: Erection of three 4-storey buildings to provide 25,486sqm (GEA) of flexible office space (Use Class B1), including up to 300sqm (GEA) of commercial space at ground floor (Use Classes A1-A5) for a temporary period of

10 years, together with temporary access, landscaping and associated works.
Approved 4th July 2018

- 3.15 Ref: 2018/00267/OUT: The former Dairy Crest Site to the north of the application site Outline planning application for a mixed use development comprising 7 development zones and accommodating up to 178,102 sqm of research and development and B1 use; up to 373 residential use class C3 in 18-32 storey buildings; a hotel up to 8 storeys and associated facilities (use class C3) in 18 – 32 storey buildings plus an additional hotel up to 8 storeys with associated retail, café, restaurants and bars (D1 and/or D2, A1-5). Decision Pending

Westfield:

- 3.16 Ref: 2013/05115/OUT: Outline Planning Application (2013/05115/OUT) for the comprehensive redevelopment of the site comprising a mixed use scheme to include construction of new buildings (ranging from 2 - 23 storeys) to provide up to 61,840sqm (net increase) retail use (A1) including an anchor department store; up to 8,170sqm restaurant and café use (A3 - A5); up to 2065sqm office use (B1); up to 1,600sqm community/health/cultural use (D1); up to 3500sqm leisure use (D2); and up to 1,347 residential units (up to 127,216sqm (C3); plus creation of a basement, an energy centre together with ancillary and associated development, new pedestrian routes and open spaces, cycle parking, car and motorcycle parking and vehicular access and servicing facilities. Approved 29th November 2013
- 3.17 Ref: 2015/05217/RES: Westfield to the south of the application site. Submission of reserved matters of Phases B (building structure) and C (building envelope) of the Westfield Phase 2 development relating to access, appearance, layout and scale of the Mall Extension and Anchor Store buildings (including parts of Plot A and Plot P) comprising 75,019sqm of retail (Class A1) floorspace, 3000sqm of restaurant/café (Class A3-A5) floorspace, 2,456sqm of leisure (Class D2) floorspace and 518 non-residential car parking spaces pursuant to outline planning permission dated 13th October 2015 (Ref: 2015/02565/VAR). Approved 26th April 2016

4.0 CONSULTATIONS

- 4.1 The application was advertised by means of a press and site notice. 3 x Site Notices were posted on the 2nd November 2018 on Wood Lane. The press notice was published in the Hammersmith Gazette on the 26th October 2018. The application has been advertised as being a Major Development that affects the character and appearance of a conservation area, and is accompanied by an Environmental Impact Assessment.
- 4.2 710 notification letters were posted to occupiers within neighbouring properties on the 25th October 2018. The consultation process expired on the 23rd November 2018.

Neighbour Responses

- 4.3 A total of 9 responses have been received (including duplications) 6 responses from individuals have been received. 5 responses constitute formal objections

with one response raising concerns. The main grounds of objection are as follows:

- Development fails to respect the character and setting of the two nearby buildings of interest, both in terms of materials and height.
- Development fails to offset the negative impact of the WCL development by 'stepping-up'.
- The proposal seeks permission for a marked increase on this established height and massing on site which will have a detrimental effect on the setting of both the Television Centre and White City Station.
- Although a precedent for tall buildings here has been set by the WCL development, this proposal exacerbates the detrimental impact that this increase in height will have to the character of the Conservation Area, rather than ameliorates the impact by creating a 'step-up'.
- The proposed materials fail to pay any regard to the predominant materials used in the surrounding Conservation Area (namely brick) and the development proposed comprises a generic incongruous dark grey polyester powder coated cladding panels and exposed concrete.
- Development not in line with policy requirements.
- Buildings are 22 & 32 storeys. This is too high and will block sunlight to the adjacent properties.
- Development could affect whole of Wood Lane Estate
- Development will create more traffic, more noise and more people
- Height should be reduced by 10 floors
- There should be no entry for cars on wood lane or deliveries, lorries, etc
- This build will have a major negative impact on the community
- Not enough areas for recreation – park provided with development is too small.

- 4.4 One response has been received from a resident within a property located north of the Westway (approximately 500m from the site). The resident raised concerns about not receiving a consultation letter, and that further letters should have been sent to properties north of Westway. When proposals include so many documents, you need far more time to read them. *Officer Response: Officers consider that the Council has fulfilled their statutory consultation obligations, and note that the representation does not directly object to the Centre House proposals.*

External Consultees

- 4.5 Transport for London (TfL): No principle objections to the development, but query the car parking provisions (will there be any double counting with WCL scheme). Subject to TfL's double-counting caveat, 16 accessible spaces is an acceptable initial quantity to be allocated to the development from the outset. However, the proposed additional 'future-proofed' quantity of 37 accessible spaces falls short of the Draft London Plan requirement for providing space for one disabled bay per 10% of dwellings. Electrical Charging spaces should be provided in accordance with Draft London Plan. A Centre House parking management plan or a revised version of that presumably consented plan for the WCL scheme should be secured, by condition. A 'Permit-Free' legal agreement will be required by s106 agreement.

TfL welcomes the compliance with Draft London Plan quantitative cycle parking

standards for both land uses, with a commitment to providing 914 long stay cycle parking at lower ground floor level and 57 short-stay spaces. Queries whether they meet the qualitative standards in order to suit people of varying levels of fitness and ability to use upper racks. S106 contribution of £10,000 is sought towards legible London. No requirement for Cycle Hire docking station or bus contribution. TfL support a contribution towards step free access of White City Station.

TfL considers trip generation figures are in accordance with guidance. Further detail sought in connection with the loading bay facilities provided for the WCL facilities and what the peak hour trip rate was for the 8m lorries they would service. All operational i.e. loading bay parking must provide infrastructure for electric or other Ultra-Low Emission Vehicles In order to meet the Mayor's target for carbon-free travel by 2050. It is welcomed that there is a WCL Phase 1 concierge provision that will take in deliveries for this development too.

Framework delivery and servicing plans and a detailed demolition arrangements/ construction logistics plan. should be secured by condition and the detailed plans should identify what efficiency and sustainability measures will be implemented whilst the development is being built/ once it is operational.

- 4.6 Greater London Authority (GLA): Principle of development: The proposal to provide a high density residential-led mixed use development in a highly accessible Opportunity Area is supported. Affordable housing: 35% affordable housing (comprising intermediate units prioritised for Imperial College London employees and other key workers) is generally supported as a starting point; however, as the scheme is not eligible for the 'Fast Track Route', GLA officers will scrutinise the Financial Viability Appraisal. Early and late stage review mechanisms should be secured and additionally flexibility should be incorporated into the s106 obligations to ensure that key worker units can be 'converted' to standard tenure affordable homes if ICL is unable to nominate occupiers in accordance with household income ranges. The type and affordability of the intermediate units must meet the Mayor's criteria and be secured robustly in the Section 106. Design and heritage: The design, layout and height of the proposed development is supported and would preserve and enhance the significance of the conservation area and would not harm adjacent heritage assets. Environment: The proposals fall short of the London Plan and draft London Plan targets for reductions in CO2 emissions. Further information has been requested on specific issues, and a contribution in lieu of any remaining shortfall must be secured by the Council through a Section 106 agreement. Transport: Planning conditions or other legal mechanisms must be secured in relation to delivering the key transport mitigation measures set out in this report. More broadly, discussions should continue on the funding and delivery of sustainable transport as part of the overall Opportunity Area approach.
- 4.7 Civil Aviation Authority (CAA): No objections. Not hazardous to aviation. However, it is recommended that London Westland Heliport is advised of this proposal. *Officer Response: London Heliports were consulted on the 11/10/2018.*
- 4.8 Thames Water (TW): Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water request that a condition is imposed which requires no properties to be occupied until confirmation has been provided that either:- all water network

upgrades required to accommodate the additional flows from the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Surface Water Option 2 is preferred over option 1, and Thames Water support use of the WCL drainage network if that can be commercially agreed between the asset owners. TfL would expect the level of protection provided by the WCL drainage not to be compromised by the additional flow and that the proposed additional attenuation on the WCL network be delivered. A finalized agreed approach to site drainage is required.

- 4.9 Historic England (Archaeology): No objection. No need for further conditions or investigations.
- 4.10 Hammersmith and Fulham Action on Disability: Generally supportive of the proposals, but have raised concerns whether the mechanism for ensuring accessible parking spaces (within the basement of the White City Living development) can be made available to residents within Centre House, without double counting the provisions in both developments. AoD question whether the 16 accessible spaces are available to occupiers whom are Blue Badge Holders. AoD also question whether the sizes of the spaces within the area allocated in WCL are sufficient enough to be converted to accessible spaces. Further comments have been made about the ground floor commercial space and whether there is need for platform lifts where the level changes occur. AOD acknowledges the M4(3) (a) standard units are clearly identified in the Design and Access Statement and that the submitted technical plans illustrate how the units could be easily adapted to M4(3) (b) standard. AoD has preference for the units to be M4(3) (b) from the outset.
- 4.11 London Underground: No objection subject to infrastructure protection condition. There are a number of potential constraints on the redevelopment of a site situated close to railway infrastructure. Therefore, it will need to be demonstrated to the satisfaction of LUL engineers that: our right of support is not compromised, the development will not have any detrimental effect on our structures either in the short or long term, the design must be such that the loading imposed on our structures is not increased or removed and we offer no right of support to the development or land.
- 4.12 Metropolitan Police: No comments
- 4.13 London Fire Services: No comments
- 4.14 Network Rail: No comments
- 4.15 Historic England (Heritage): No comments
- 4.16 Royal Borough of Kensington and Chelsea: No comments
- 4.17 Wood Lane Tenants and Residents Association: No comments
- 4.18 Hammersmith Society: No comments
- 4.19 Crime Prevention Officer: No comments

- 4.20 Environment Agency (EA): No comments
- 4.21 London Heliports: No comments
- 4.22 Natural England: No comments
- 4.23 Sport England: No comments
- 4.24 Wormholt Estate Tenants and Residents Association: No comments
- 4.25 Wood Lane Residents Association: No comments
- 4.26 White City Neighbourhood Forum: No comments
- 4.27 British Airports Authority: No comments

Internal Consultees:

- 4.28 Environmental Protection: No objections subject to conditions relating to sound insulation, noise levels, anti-vibration measures, external machinery/plant, external lighting, odour abatement scheme, service management plan to be submitted for approval.
- 4.29 Environmental Quality (Contamination): No objections subject to conditions requiring approval of preliminary risk assessment, site investigation, qualitative risk assessment, remediation method statement, on-going verification report, long term monitoring report.
- 4.30 Environmental Quality (Air Quality): No objections subject to conditions requiring details of Low Emissions Strategy, Air Quality Dust Management Plan and Combustion Plant to comply with emissions standards.
- 4.31 Environmental Policy: Flood Risk and Drainage: Initial concerns raised in connection with surface water and sustainable urban drainage scheme. Further detail sought to confirm the discharge/run-off rates, volume of attenuation within the attenuation tanks, and whether the area for green and brown roofs is optimised. Further clarification and detail was sought as part of a revised site wide detailed drainage strategy and this should include a management and maintenance scheme. *(Officer note: The applicant submitted further technical notes that provided further details of the drainage plans to address these comments)*

Details of the proposed groundwater protection measures to be integrated should be provided. The site is in the Environment Agency's Flood Zone 1 which indicates a low risk to flooding from the River Thames. There is therefore no need to assess or mitigate this source of flood risk.

Structural water-proofing measures are required. The FRA states that the basement is designed to prevent water penetration but there is no information on what measures will be included. Policy CC3 requires provision of this information, so further details should be provided.

Energy: Further detail on the connection of Centre House to the Combined Heat and Power system is required. After the implementation of the energy efficiency and low carbon measures, the residential aspect of the proposal are calculated to be responsible for 365 tonnes of CO2 a year. To achieve the zero carbon target therefore, a payment of £657,000 in lieu is required to offset these emissions. The proposed energy efficiency measures include improved insulation, better airtightness to reduce heat loss, heat recovery on ventilation systems, energy efficient lighting and an efficient space and water heating system which includes a communal heat network and Combined Heat and Power (CHP) system are calculated to reduce annual CO2 emissions to 379 tonnes. This represents a reduction across the site of 36.3%.

Sustainability: A Sustainability Statement has been provided with the application which includes a BREEAM pre-assessment report which applies to the non-residential component of the site.

The BREEAM assessment shows that the "Very Good" rating will be achieved for the non-residential aspects of the proposal. Sustainable design and construction measures are also planned for the residential units. In addition to the carbon reduction measures outlined in the Energy Assessment, other measures that will be designed in include water efficiency, waste management and recycling, use of building materials with low environmental impacts where possible, including recycled materials where feasible, inclusion of measures to minimize noise pollution and air quality impacts, flood risk and sustainable drainage measures (see separate comments), sustainable transport measures and biodiversity improvements. The development site will also be registered with the Considerate Constructors Scheme to encourage environmentally and socially considerate ways of working and reduce adverse impacts arising from the construction process.

The implementation of the sustainability measures as outlined in the Sustainability Statement and BREEAM assessment and the requirement of a submission of a post construction BREEAM assessment and sustainability summary report to confirm that the measures have been implemented as required can be conditioned.

- 4.32 Waste Management: No objections. No further details are needed.
- 4.33 Economic Development Team: No objections subject to s106 obligations securing 61 apprenticeships, 26 paid work placements, 26 unpaid work replacements, £395,500 contributions towards employment and training initiatives, Local Procurement initiatives and Business Engagement (supplier and buyer) and Investment initiatives.
- 4.34 Conservation and Design: No objections. Comments incorporated into officer assessment
- 4.35 Planning Policy: No comments
- 4.36 Housing and Regeneration: No comments
- 4.37 Emergency Services: No comments

4.38 Building Control: No response

4.39 Transport and Highways: No objections subject to conditions. Comments incorporated into report.

5.0 PROPOSED DEVELOPMENT

5.1 A full planning application is submitted for the redevelopment of the site for a residential-led mixed-use redevelopment of the site. The description of development is:

Detailed planning application for demolition of all buildings on site, and erection of two buildings with basement level, comprising 1 x part 11/ part 22 storey building and 1 x part 11/part 32 storey building to provide 527 residential units with ancillary residential facilities (C3); 1,350 sq m (GEA) of flexible commercial, community and leisure floorspace (A1-A3, B1, D1-D2); means of access, public realm, amenity space, landscaping, and other associated infrastructure works including creation of basement level access to the adjoining White City Living site and works to the site's western boundary.

5.2 The proposals comprise two separate buildings spanning the length of the site, which are separated by a new east-west pedestrian walkway providing access to the neighbouring WCL development to the east, and Imperial's White City campus development to the north and Westfield shopping centre to the south. Together the southern and northern buildings form a continuous low rise, 11 storey podium which emphasises the development's gentle crescent form.

5.3 Above the podium level, two centrally located tall, slender buildings which are 32 and 22 storeys in height are proposed. These buildings form a focal point midway along the site, which demarks the new pedestrian route and access to Arrival Square; a brand new public space, which also provides areas for servicing and deliveries to the site and White City Living (WCL).

5.4 The proposal is car-free with the exception of 16 blue badge wheelchair accessible disabled car parking spaces which will be provided at basement level of the adjacent WCL development. Vehicular Access to the basement will be provided in between Buildings A1 and A3 in the WCL development via the bridge from Wood Lane. Whilst the two developments are separate they are interlinked, forming a new urban block with WCL Phases 1 and 2, and sharing amenity and children's playspace, a servicing area within Arrival Square as well as a shared connection to a site wide heating network and shared access to the WCL basement for disabled car parking spaces.

Site Layout and Arrangement of Uses

5.5 In addition to the proposed residential units, non-residential uses are proposed at ground floor levels. The proposed development provides 46,181 (GEA) sqm of Class C3 (Residential) floorspace and 1,350 sqm (GEA) of Flexible A1-A3, B1 & D1/D2 (Commercial retail/restaurant/office/non-residential institution and leisure) floorspace. The combined floorspace is 47,531sqm.

- 5.6 The scheme provides 1,350 sq m (GEA) of floor space across areas of the ground and lower ground floors of both the southern and northern buildings. It is proposed that the commercial space will be utilised and managed by Imperial College. The space runs continuously across the full length of the southern block creating an active frontage to the southern block’s western elevation. The ground floor commercial use is anticipated to provide a southern entrance/arrival space to Imperial’s new White City campus, proposed to the north of the site.
- 5.7 The northern block also incorporates a smaller (flexible use) commercial unit which will add further activation at ground floor level. The proposals seek flexibility for a number of uses to occupy the commercial floorspaces to allow Imperial College to use the space according to their requirements.
Residential
- 5.8 The 527 residential homes will provide a mix of private and affordable accommodation. The proposals provide 185 affordable homes, equating to 35% (by habitable rooms and homes). The affordable units will provide affordable intermediate rent properties for employees/key workers of Imperial College. All of the units within the southern building are market units, whilst the northern building contains a mixture of intermediate rent and market properties.
- 5.9 The below Table 1 summarises the mix of units across the private and affordable tenures:

Market			Affordable Housing			Site Wide		
	Units No.	% Mix		Units No.	% Mix		Unit No.	% Mix
Studio	29	8.5	Studio	17	9.1	Studio	46	8.7
1 bed	159	46.5	1 bed	72	38.9	1 bed	231	43.8
2 bed	129	37.7	2 bed	96	51.9	2 bed	225	42.7
3 bed	25	7.3	3 bed	0	0	3 bed	25	4.7
Total	342	100%	Total	185	100%	Total	527	100%

Table 1. Private and Affordable Housing Mix

- 5.10 The residential accommodation is accessed from residential lobbies which open onto the development’s western and eastern elevations. The two blocks contain six residential cores positioned within each of the buildings’ transverse bay elements. The cores, at each floor level, provide access to no more than eight residential homes.
- 5.11 The building’s transverse bay features enable a proportion of units to comprise dual aspect; 70% in total. No north facing single aspect units are proposed. An accommodation schedule has been provided which demonstrates that all proposed units exceed the internal space requirements set out within the Technical Housing Standards – nationally described space standards (2015). All residential units have their own outdoor amenity space in the form of a balcony, which meets the space standards set out within the Mayor’s Housing SPG (2016).
- 5.12 The development provides 53 (10%) M4(3) ‘wheelchair user’ dwellings designed to be easily adaptable for occupiers who are wheelchair users. These are spread throughout the buildings within both tenures of accommodation. A further Access Statement has been submitted by the applicant to demonstrate the various standards and dimensions provided by the M4(3) wheelchair user dwellings

including a demonstration of how they can be adapted to M4(3) (b) standard 'fully accessible' wheelchair user dwellings.

Scale and Appearance

- 5.13 The proposed development is split into two separate buildings forming a southern and northern block. The site's proportions and gently curved profile provide the opportunity to create a building defined by a grand, sweeping crescent. This crescent form is emphasised by the two buildings' consistent shoulder height (which is at 11 storeys).
- 5.14 This crescent provides a distinctive overall form, designed to relate to the curvilinear qualities of the Grade II listed former BBC Television Centre and draws a relationship to White City Underground Station.
- 5.15 Two tall slender buildings are located centrally within the site rising from the 11-storey podium. The tallest, within the northern block, is 32 storeys, whilst the southern element is 22 storeys in height. The proposal's height steps in three equal increments.

Landscaping and Public Realm

- 5.16 A new pedestrian avenue is proposed to the west of the application site and will provide access from Wood Lane and Exhibition Park to the south of the site to the proposed new Imperial College campus in the north. Contiguous commercial space along the western edge of the southern block provides activation of the ground floor frontage. Water features, planting and break out spaces with seating will be provided along the route.
- 5.17 Communal amenity space and children's playspace for the site will be located directly to its east, within WCL Phase 2 and shared between the two developments. The southern building will also have a communal roof terrace at the roof level, measuring circa 600 sq m and can be accessed from an 85 sq m communal lounge. These would be open to all residents of the buildings.

Highways and Servicing

- 5.18 The proposal is car-free apart from the provision of blue badge disabled car parking spaces, provided at basement level of the adjacent WCL development. The car parking has direct access into the proposed residential cores at basement level of the site.
- 5.19 The basement within the proposed development will provide residential cycle parking spaces (915 in total), including 22 secure commercial cycle parking spaces. 58 short stay cycle parking for both the residential and commercial uses will also be provided within the development's landscaped areas.
- 5.20 Arrival Square is located directly to the east of the proposed buildings at the heart of WCL and the proposed development. This area will accommodate all taxi drop-offs, small deliveries and emergency vehicles for both sites, whilst larger deliveries and refuse vehicles will use the access into the WCL basement and servicing area.

Sustainability

- 5.21 The Energy Strategy for the proposed development confirms that a range of advance Be Lean energy efficiency measures are proposed that enable the proposed development to meet L1A 2013 Target Emission Rate (TER) and Target Fabric Energy Efficiency (TFEE) minimum standards for the residential aspect of the development through energy efficiency measures alone.
- 5.22 The application of low carbon energy supply and generation through the use of an on-site Combined Heat and Power (CHP) engine achieves a further regulated CO2 emission reduction of 36.3% over Be Lean emissions.
- 5.23 A full BREEAM Pre-Assessment is provided with the planning application and provides an illustrative route to achieve the 'Very Good' rating for the proposed ground floor commercial units.

Community Engagement

- 5.24 The accompanying Statement of Community Involvement (updated in January 2019) prepared by IcenI details the applicant's consultations with the local community, including local people, local amenity groups and local Councillors since November 2017.
- 5.25 The consultation programme sought to engage with all sections of the community to ensure that as many people as possible had the opportunity to take part in the process. This responds to LBHF's published guidance. Section 2.4 of the Council's Statement of Community Involvement (2015) sets out the core principles for community involvement which include aiming to hear a full range of views; ensuring an inclusive approach; clearly communicating information and opportunities for discussing; and ensuring feedback and continuity.
- 5.26 The Applicant also consulted the following stakeholders:
- Wood Lane Residents Association
 - Hammersmith Society;
 - White City Residents' Association;
 - St Helen's Residents' Association;
 - Wood Lane Community Association;
 - LBHF Disability Access Forum; and
 - Friends of Hammersmith Park.
- 5.27 A public exhibition and consultation event took place at the Wood Lane Community Centre on 7th February 2018. Information boards and 3D models of the proposals were available for interested members of the public to view. Consultation feedback forms were completed by attendees, and a review of the comments is provided within the Statement of Community Involvement.

- 5.28 The Statement of Community Involvement and Design and Access Statement further detail meetings that were held with interested parties and how their feedback has informed and shaped the proposed development. Throughout the consultation process, feedback from interested parties has been largely positive. Key topics raised by local amenity societies and residents included support for the provision of affordable Imperial staff accommodation, support for the landscaping proposals and the creation of improved permeability into and around the site.
- 5.29 Questions were raised relating to a number of issues including the impact of construction works on local residents, the development's townscape impact, and the proposed ground floor uses. Details relating to these queries are covered within the Construction Logistics Plan, the Townscape and Heritage Visual Impact Assessment, and the Design and Access Statement, all of which are submitted with the planning application.
- 5.30 A follow-up meeting was held in November 2018 with the Wood Lane Estate Residents Association. It was reported that residents had concerns about the height of the taller buildings (and the resulting daylight/sunlight effects) and whether they could be reduced. In response St James commissioned a further technical assessment of a development scenario involving a reduction in the height of the tall buildings, with a slight increase in the buildings' shoulder height to ensure that there would be no reduction in floorspace across the development. The EIA authors were instructed to assess whether the changes in height would have a negative or a positive impact on the conclusions of the Environmental Statement submitted within the planning application for Centre House. This assessment concluded that the changes in height would not result in an improvement to the Environmental Statement conclusions.

6.0 ENVIRONMENTAL IMPACT ASSESSMENT

- 6.1 An Environmental Impact Assessment (EIA) has been undertaken and an Environmental Statement (ES) submitted under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. This requires certain development-related issues to be assessed to establish whether they would have any significant effect on the environment. The scale and type of the proposals, and their cumulative impact with the adjoining developments ensures that the proposal is EIA development requiring an ES.
- 6.2 The ES comprises:
- Volume I: Main Assessment Text and Figures – the main body of the ES, detailing the results of environmental investigations, effects arising and proposed mitigation measures;
 - Volume II: Townscape, Visual Impact and Built Heritage Assessment (TVIHA) – reports the findings of the assessment of the effects on key and strategic views to and from the Site;
 - Volume III: Technical Appendices – comprises survey data, technical reports and background information supporting the assessments and conclusions given within the main ES; and
 - Non-Technical Summary – summarises the key findings of the ES in nontechnical language.

- 6.3 The ES informs readers of the nature of the Proposed Development and the likely environmental effects. It also presents the measures proposed to eliminate, reduce or mitigate any likely significant adverse effects on the environment (referred to as 'mitigation' measures). The ES identifies environmental effects during the demolition and construction phase, and on completion and occupation of the Proposed Development.
- 6.4 The significance of effects has been defined with reference to specific standards, accepted criteria and legislation where available. Effects have been classified as being:
- Adverse – detrimental or negative effects to an environmental / socioeconomic resource or receptor (a component of the natural, created or built environment that is affected by an impact);
 - Negligible – imperceptible effects to an environmental / socio-economic resource or receptor. These effects are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error. These effects are unlikely to influence decision making; or
 - Beneficial – advantageous or positive effect to an environmental / socioeconomic resource or receptor.
- 6.5 Where adverse or beneficial effects have been identified, these have primarily been assessed against the following scale (and are further defined within Volumes I and II of this ES):
- Minor – slight, very short or highly localised effect of no significant consequence;
 - Moderate – limited effect (by extent, duration or magnitude), which may be considered significant; or
 - Major – Considerable effect (by extent, duration or magnitude) of more than local significance or in breach of recognised acceptability, legislation, policy or standards.
- 6.6 Effects are also generally assigned a geographic extent (local, regional or national) and duration (temporary or permanent). In addition, the ES identifies the potential for direct and indirect effects, and interactions and cumulative effects.
- 6.7 Regulation 13 of the EIA Regulations provides that an applicant may ask a Local Planning Authority to state in writing its opinion as to the scope of an EIA. A formal EIA Scoping Report was submitted to the London Borough of Hammersmith and Fulham (LBHF) on the 3rd April 2017 and as detailed in Chapter 5 Methodology of the ES, a Scoping Opinion was received from LBHF on the 9th May 2017 (refer to Appendix 5-B, ES Volume III).
- 6.8 The following technical topics were assessed as part of the EIA:
- Traffic and Transportation
 - Noise and Vibration
 - Air Quality
 - Water Resources and Flood Risk
 - Ecology

- Waste
- Ground Conditions
- Wind and Microclimate
- Daylight, Sunlight and Overshadowing
- Socio-Economics; and
- Townscape.

6.9 The EIA identified that once development is completed and occupied, the vast majority of environmental impacts are negligible and/or of minor benefit (ie: of no significance). The significant residual effects are identified following completion of development (post mitigation measures) as anticipated in the ES in Table 2 below.

6.10 The Environmental Considerations are addressed in detail, in Section 8 of this report with each containing a factual summary of the findings contained within the Environmental Statement.

Table 2. Residual Effects forecasted in the ES

Topic	Receptor	Effect	Residual Significance
Demolition and Construction			
Townscape, Heritage and Visual Impact	Close distance receptors TCA 1 and the Wood Lane Conservation Area	Townscape and visual effects during construction	Minor to Major Adverse
Operation			
Daylight/Sunlight	White City Living (Phases 1 and 2)	Reduction in daylight/sunlight levels and overshadowing	Moderate Adverse
Townscape, Heritage and Visual Impact	Townscape Character Area TCA 1	Improved townscape and visual effect due to well composed and high quality new buildings	Major Beneficial,
Townscape, Heritage and Visual Impact	Views 12 (Wood Lane Public Highway), 13 (BBC Television Centre Forecourt), 14 (Wood Lane at entrance of White City Living development), 15 (Wood Lane at South Africa Rd) and 16 (White City Employment Area)	Improved townscape and visual effect due to well composed and high quality new buildings	Major Beneficial

Townscape, Heritage and Visual Impact	Wood Lane Conservation Area	Improved townscape and visual effect due to well composed and high quality new buildings	Major Beneficial
Townscape, Heritage and Visual Impact	Views 2 (North Open space Little Wormwood Scrubs), 3 (North western open space – Wormwood Scrubs Park) and 4 (North eastern space – Kensington Memorial Park)	Improved townscape and visual effect due to well composed and high quality new buildings	Moderate Beneficial
Townscape, Heritage and Visual Impact	Views 1 (Kensal Green Cemetery), 5 (Kelfield Gardens – Oxford Gardens Conservation Area), 7 (Darfield Way) and 8 (Avondale Park Gardens Conservation Area)	Improved townscape and visual effect due to well composed and high quality new buildings	Moderate neutral
Water Resources and Flood Risk	Water Services Infrastructure	Reduction in amount of surface water drainage being discharged into surface water network and improvement to Flood Risk	Moderate Beneficial
Cumulative Effects			
Cumulative Effects- Interactive Effects	White City Living	Interaction effect (from construction noise and vibration, townscape and visual impact and air quality)	Short-term Minor-Major Adverse (during construction – moderate overall)
Cumulative Effects- Interactive Effects	Former Dairy Crest Site (now ICL)	Interaction effect (from construction noise and vibration, townscape and visual impact and air quality)	Short-term Minor-Major Adverse (during construction – moderate overall)
Cumulative Effects-	Close Distance receptors	Interaction effect (from construction	Short-term Minor-Major Adverse

Interactive Effects		noise and vibration, townscape and visual impact and air quality)	(during construction – moderate overall)
Cumulative Effects – in Combination Effects	Viewpoints 1 (Kensal Green Cemetery), 5 (Oxford Gardens CA), 7 (Darfield Way) and 8 (Avondale Park Gardens	Townscape Views	Moderate neutral effect

7.0 PLANNING POLICY FRAMEWORK

- 7.1 The Town and Country Planning Act 1990 (referred to as ‘the Act’), the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011 are the principal statutory considerations for town planning in England and Wales.
- 7.2 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).
- 7.3 In this instance the statutory development plan comprises the London Plan (2016), the Local Plan 2018 and the Planning Guidance Supplementary Planning Document 2018 (hereafter referred to as Planning Guidance SPD). A number of strategic and local supplementary planning guidance and other documents are also material to the determination of the application.

The National Planning Policy Framework (February 2019)

- 7.4 The application has been evaluated against the Development Plan and the NPPF (2019) and the Authority has assessed the application against the core planning principles of the NPPF and whether the proposals deliver “sustainable development.”
- 7.5 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development which for decision taking means approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 7.6 NPPF Paragraph 118 (in Part 11 Making Effective Use of Land) requires that Planning decisions should (a) encourage multiple benefits from urban land through mixed use schemes and taking opportunities to achieve net environmental gain (et al); (c) give substantial weight to the value of using suitable

brownfield land within settlements for homes and other identified needs (et al) and (d) promote and support the development of under-utilised land and buildings (et al).

The London Plan (2016)

- 7.7 The London Plan (as amended 2016) provides the strategic policy context for all 32 of the London boroughs and the Corporation of the City of London. It is a spatial development strategy up to 2036 and its main themes are economic development and wealth creation, social development and improvement of the urban environment.
- 7.8 The Mayor's strategic policies aim to provide more homes, promote opportunity and provide a choice of homes for all Londoners that meet their needs at a price they can afford.
- 7.9 There is a recognised need for all housing types and Policy 3.3 of the London Plan seeks to increase housing supply. Policy 3.4 seeks to optimise housing potential and Policy 3.5 require housing developments to be of the highest quality.
- 7.10 Paragraph 3.13 and Policy 3.3 of the London Plan recognise the 'desperate need for more homes in London' and set an annual housing target for the London Borough of Hammersmith and Fulham to deliver 1,031 net new homes per year.
- 7.11 The London Plan designates the site within the White City Opportunity Area (WCOA). Opportunity Areas are identified on the basis that they are capable of accommodating substantial new jobs and homes and the London Plan advises that their potential should be maximised. The London Plan identifies that the WCOA should provide a minimum of 6,000 new homes, although this figure is increased to 7,000 new homes within the Draft London Plan (2017).
- 7.12 All of the policies in the London Plan are of strategic importance. Those that are considered particularly relevant to the proposed development are:
- Policy 2.9 – Inner London
 - Policy 3.1 – Ensuring equal life chances for all
 - Policy 3.3 – Increasing Housing Supply
 - Policy 3.4 – Optimising Housing Potential
 - Policy 3.5 – Quality and Design of Housing Developments
 - Policy 3.6 – Children and Young People's Play and Informal Recreation Facilities
 - Policy 3.7 – Large Residential Developments
 - Policy 3.8 – Housing Choice
 - Policy 3.9 – Mixed and Balanced Communities
 - Policy 3.10 – Definition of Affordable Housing

- Policy 3.11 – Affordable Housing Targets
- Policy 3.12 – Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes
- Policy 3.13 – Affordable Housing Thresholds
- Policy 3.16 – Protection and enhancement of social infrastructure
- Policy 4.1 – Developing London’s Economy
- Policy 4.2 – Offices
- Policy 4.3 – Mixed Use Development and Offices
- Policy 5.1 – Climate Change Mitigation
- Policy 5.2 – Minimising Carbon Dioxide Emissions
- Policy 5.3 – Sustainable Design and Construction
- Policy 5.5 – Decentralised Energy in Development Proposals
- Policy 5.7 – Renewable Energy
- Policy 5.13 – Sustainable Drainage
- Policy 5.21 – Contaminated Land
- Policy 5.22 – Hazardous Substances and Installations
- Policy 6.3 – Assessing Effects of Development on Transport Capacity
- Policy 6.13 – Parking
- Policy 7.1 – Building London’s Neighbourhoods and Communities
- Policy 7.2 – An Inclusive Environment
- Policy 7.3 – Designing Out Crime
- Policy 7.4 – Local Character
- Policy 7.5 – Public Realm
- Policy 7.6 – Architecture
- Policy 7.7 – Location and Design of Tall and Large Buildings
- Policy 7.8 – Heritage Assets and Archaeology
- Policy 7.14 – Improving Air Quality
- Policy 7.15 – Reducing Noise and Enhancing Soundscapes
- Policy 7.19 – Biodiversity and Access to Nature
- Policy 8.2 – Planning Obligations
- Policy 8.3 – Community Infrastructure

7.13 The Mayor has also published supplementary planning guidance and strategies which elaborates on London Plan Policy. Those most relevant in consideration of the proposals are:

- Affordable Housing and Viability SPG (August 2017)
- Mayor's Housing SPG (March 2016)
- Social Infrastructure (May 2015)
- Sustainable Design and Construction (April 2014)
- Accessible London- Achieving an Inclusive Environment (October 2014)
- Shaping Neighbourhoods: Character and Context (June 2014)
- Shaping Neighbourhoods: Play and Informal Recreation (September 2012)
- London View Management Framework (March 2012)

The Draft New London Plan (November 2017)

7.14 In November 2017, the Greater London Authority published their Draft London Plan. The consultation period ended on 2nd March 2018. Consultation comments will be reviewed by the independent Planning Inspector appointed by the Secretary of State and the Plan's formal Examination in Public is currently ongoing.

7.15 It is expected that the new London Plan will be adopted in 2019. Once adopted, the new London Plan will replace the policies of the current London Plan (2016) and will become the new regional Spatial Development Strategy.

7.16 The policies within the Draft London Plan carry limited material weight at the time of writing the report. The policies will assume more weight, post Examination in Public (EIP).

Affordable Housing and Viability SPG (August 2017)

7.17 The Mayor of London adopted a new Affordable Housing and Viability Supplementary Planning Guidance (SPG) in August 2017.

7.18 The SPG includes a new threshold approach to viability, which makes provision for a Fast-Track Route for planning applications, which are not required to submit a viability assessment to the Mayor. The Fast-Track Route applies to applications that meet a 35% threshold of on-site affordable housing (in habitable rooms). Such applications will not have to submit a viability assessment or be subject to future viability review mechanisms provided an agreed level of progress is made following the grant of planning permission.

7.19 In order to qualify for the Fast-Track Route, applications should deliver at least 35 per cent affordable housing on-site without public subsidy; be consistent with relevant local affordable housing tenure split whilst meeting other obligations and requirements to the satisfaction of the LPA and the Mayor where relevant.

Applications should also demonstrate that they have sought to increase the level of affordable housing beyond 35 per cent by accessing grant.

White City Opportunity Area Planning Framework (WCOAPF)

- 7.20 The GLA in partnership with LB Hammersmith and Fulham and Transport for London prepared the WCOAPF (Dec 2013), which seeks to guide the comprehensive redevelopment of the opportunity area. Figure 2.1 'Land Use Strategy' identifies the site, along with others within the White City East Area, and within an area suitable for housing, commercial, creative and academic uses as part of a mixed-use area.

Local Planning Policy

Development Plan

- 7.21 The relevant Development Plan for the area comprises the:
- LBHF Local Plan (2018)
 - LBHF Local Plan Proposals Map (2018)
 - London Plan (MALP) (2016)
- 7.22 In addition, the Wood Lane Conservation Area Character Profile (1998) and the LBHF Supplementary Planning Guidance Document (2018) are material planning considerations.

LBHF Local Plan (2018)

- 7.23 The Local Plan (February 2018) sets out the council's vision for the borough until 2035. It contains development policies to be used by the Council in helping to determine individual planning applications. The Local Plan should be read and considered alongside the London Plan and will be supplemented by supplementary planning documents (SPDs).
- 7.24 The Local Plan incorporated an increase in target additional new homes within the White City Regeneration Area to 6,000 (from 5,000 in the former Core Strategy). The figure for new homes is proposed to be increased to 7,000 within the Draft London Plan (2017).
- 7.25 The policies within the Local Plan aim to ensure development within the borough accords with the spatial vision of the borough. The key policies relevant to the proposals are:
- Strategic Policy WRCA – White City Regeneration Area
 - Strategic Site Policy WCRA1 – White City East
 - Policy HO1 - Housing Supply
 - Policy HO3 - Affordable Housing
 - Policy HO4 - Housing Quality and Density
 - Policy HO5 - Housing Mix

- Policy HO6 - Accessible Housing
- Policy HO11 - Detailed Residential Standards
- Policy E2 - Land and Premises for Employment Uses
- Policy DC1 - Built Environment
- Policy DC2 - Design of New Build
- Policy DC3 - Tall Buildings
- Policy OS3 - Play space for Children and Young People
- Policy T3 - Increasing and promoting Opportunities for Cycling and Walking
- Policy T4 - Vehicle Parking Standards
- Policy CC1 – Reducing Carbon Dioxide Emissions
- Policy CC2 - Ensuring Sustainable Design and Construction
- Policy CC3 – Minimising Flood Risk and Reducing Water Use
- Policy CC4 – Minimising Surface Water Run-off with Sustainable Drainage Systems
- Policy CC7 – On-Site Waste Management
- Policy CC9 - Contaminated Land
- Policy CC10 – Air Quality
- Policy CC11 – Noise

LB Hammersmith and Fulham Supplementary Planning Guidance (2018)

- 7.26 LB Hammersmith and Fulham have adopted a Planning Guidance Supplementary Planning Document (February 2018), which provides supplementary detail to policies concerned with a variety of topics within LBHF's Local Plan or any neighbourhood plans that may come into effect in the borough.
- 7.27 The SPD is organised around key principles, formed to develop more detail on the application of strategic and borough wide policies in the Local Plan.

Wood Lane Conservation Area Character Profile (1998)

- 7.28 The Conservation Area Character Profile outlines that much of the justification for designating the conservation area in 1991 was the need to protect the BBC Television Centre building from potentially insensitive development nearby.
- 7.29 Since the Conservation Area Character Profile was adopted the Television Centre has undergone redevelopment. Planning permission was granted in 2015 for a scheme which retained the core part of the Television Centre, with redevelopment

around it to provide 943 residential units and 6,182 sq m of business floor space, as well as a mix of retail, community and leisure uses.

Equality Act

- 7.30 In addition, Section 149 of the Equality Act (2010) which sets a Public Sector Equality Duty (PSED) came into force in April 2011 and requires the Council to consider the equality impacts on all protected groups when exercising its functions. In the case of planning, equalities considerations are factored into the planning process at various stages. The first stage relates to the adoption of planning policies (national, strategic and local) and any relevant supplementary guidance. In coming to a recommendation, officers have considered the equalities impacts on protected groups in the context of the development proposals. This planning report identifies the possible equality impacts on the protected groups within the following sections.

Planning (Listed Buildings and Conservation Areas) Act 1990

- 7.31 Officers acknowledge that there is a strong statutory presumption under the Planning (Listed Building and Conservation Areas) Act 1990 and as reflected in recent case law against the grant of planning permission for any development which would either (1) fail to preserve the setting or special architectural or historic character of a listed building or (2) fail to preserve the character or appearance of a conservation area. This is because the desirability of preserving the special architectural or historic character of a listed building, or the character or appearance of the area is a consideration of considerable importance and weight.

8.0 PLANNING ASSESSMENT

- 8.1 The main considerations to the assessment of this application have been summarised as follows:

- Principle of Development
- Loss of Employment Uses
- Housing
- Design, Townscape and Heritage
- Landscaping
- Transport and Highways
- Amenity Considerations
- Environmental Considerations
- Planning Obligations

Principle of Development

- 8.2 It is a key strategic objective to increase the supply and choice of high quality homes and ensure that new housing meets local needs and aspirations. LBHF Local Plan policy HO1 sets out that the Council will work with partner organisations and landowners to exceed the London Plan (2016) minimum target of 1,031 additional dwellings a year up to 2025.
- 8.3 London Plan Policy 3.3 outlines that the Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs and at a price they can afford. The policy emphasises that boroughs should seek to achieve and exceed the relevant minimum borough annual average housing targets.
- 8.4 Local Plan Strategic Site Policy WCRA1 relates to the White City East area, which the site is located within. Proposals for development within White City East should provide large amounts of housing for residents across all tenures, house sizes and affordability, whilst ensuring that development provides high quality places for living and working that are well integrated with, and respect the setting of, the surrounding area.
- 8.5 Draft London Plan policy D6 (Optimising housing density) requires that development proposals make the most efficient use of land to be developed at the optimum density. Particular consideration should be given to the site context, its PTAL (level 6) and connectivity and the capacity of surrounding infrastructure.
- 8.6 The proposed development aims to optimise the residential quantum whilst delivering well-designed buildings. The development therefore seeks to respond to the overall strategy for regeneration in White City. This is considered to be more pressing at the current time, given that it now appears unlikely that the emerging development sites will deliver the quantum of new residential units within the Opportunity Areas that are envisaged by LBHF and the GLA. It is considered that it is an imperative to maximise housing delivery at the site, with limited other remaining major regeneration sites capable of delivering the level of housing needed, and required by the adopted and emerging housing targets.
- 8.7 It is acknowledged that the proposals result in the loss of Class B1 employment generating floorspace. However, it should be noted that the supply of office B1 type employment floorspace is high within White City, particularly with the significant office developments at Television Centre, White City Place, Westfield and Imperial College. As such, the loss of employment generating floorspace should be considered in the current context regarding office supply in White City (and LBHF), and in light of the pressing need for new homes.
- 8.8 Accordingly, it is considered that the principle of the residential-led, mixed use redevelopment of the site is acceptable in accordance with the Local Plan policies WCRA, HO1, HO3 and HO4 and London Plan policies 2.3 and 3.3, and the NPPF (2019) which requires development to make effective use of land, with particular emphasis on brownfield/previously developed sites.

Loss of Employment Uses

- 8.9 The existing building has a lawful office use (Class B1) throughout. The proposed development would provide 1,350 sqm of new commercial floorspace (with flexible

uses) within the ground floor of the southern building, and within a smaller ground floor unit in the northern building. However, the proposals would result in an overall loss in the quantum of office floorspace across the development.

- 8.10 LBHF's Local Plan policy E2 (Land and Premises for Employment Uses) sets out that where the loss of an employment use is proposed the Council will have regard to a number of factors including, evidence of unsuccessful marketing, the suitability of the site for continued employment use and the need to ensure a sufficient stock of premises to meet local employment needs.
- 8.11 London Plan Policy 4.2 (Offices) supports the management and mixed use development and redevelopment of office provision to improve London's competitiveness, including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises.
- 8.12 Strategic Site Policy WCRA1 requires that development within White City East should be mixed use providing housing and employment including academic based industries to form a major research and academic hub.
- 8.13 The site is currently in Class B1 use; the buildings provide space for a range of businesses across 10,315 sq m. Blocks A and B are let to UK Media Platforms who market the building as the UGLI Campus. Block, C is sub-let to Imperial College's subsidiary Thinkspace who sub-let space to two tenants who are mission aligned to the Imperial College. Block D is occupied by the BBC's R&D division.
- 8.14 The applicant has confirmed in the Planning Statement that Thinkspace will manage Scale Space, which consists of circa 25,500 sq m of office floorspace, which will operate as a 10 year meanwhile use on the adjoining Former Dairy Crest site. The meanwhile use was approved in 2018 (Ref: 2017/04276/FUL) and construction is underway. The opening of this new office space should coincide with Thinkspace, and its two sub-tenants, leaving Centre House and relocating to Scale Space.
- 8.15 The Planning Statement also confirms that BBC R&D division vacate Centre House on 13th June 2019 and have confirmed that they are relocating to existing BBC premises within the WCOA. The final remaining tenant is UK Media Platforms whose tenancy expired in December 2018. The Planning Statement confirms both tenants will vacate the building on lease expiry.
- 8.16 In addition to the neighbouring meanwhile use, within the WCOA there is an additional 325,000sq m of commercial floorspace either recently completed, recently permitted or currently under determination by LBHF. The nearby White City Place development on Wood Lane alone will provide over 200,000 sq m of new office space.
- 8.17 The Dairy Crest meanwhile use will provide 25,500 sq m of office floorspace. The supporting documents for that planning application confirm that the development will provide flexible floorplates to respond to the various occupier requirements that it is intended to attract. The general arrangement of the floorplates will provide an open expanse with shared services and amenities located within the central core of each building. Due to the temporary nature of the build, it will provide

comparatively affordable accommodation for small, medium and start-up companies.

- 8.18 Finally, the 2018 opening of the White City Incubator (I-Hub) at Imperial West has contributed to re-providing space in a bespoke research and translation facility which would also be suitable for some of Centre House's existing tenants.
- 8.19 When the quantum and choice of new commercial floorspace which has already been delivered or is coming forward within the WCOA is considered, it is considered that there would be suitable alternative, including competitively priced, floorspace for tenants of the site to relocate within the area.
- 8.20 The application site has not been marketed to other commercial occupiers. However, it is considered that given the quantum of available local commercial floorspace and the countervailing aims of local and strategic policies which require housing-led intensification of the area, the proposal accords with policy.

Housing

- 8.21 At both a London-wide and local level, a strategic objective is to increase the supply and choice of high quality homes and ensure that new housing meets local needs and aspirations. Local Plan Policy HO1 (Housing Supply) seeks to address this strategic objective, highlighting that the Council intend to exceed their London Plan (2016) minimum housing target of 1,031 additional homes annually until 2025.
- 8.22 Policy HO1 is predicated on the London Plan's historic housing figures which have since been revised within the Draft London Plan. Accordingly, Draft London Policy H1 (Increasing housing supply) confirms that the housing target for LBHF will increase to 1,648 homes annually once the new London Plan has been adopted.
- 8.23 Notwithstanding the content of Local Plan Policy E2 (Land and Premises for Employment Uses), the site is within the wider WCOA which has been identified as an area which must maximise housing delivery.
- 8.24 LBHF Local Plan policy WCRA relates to the White City Regeneration Area and encourages housing-led intensification to enable the area's regeneration. The policy sets out that the WCOAPF area as a whole (including the site) has the potential to deliver a minimum of 6,000 homes and 10,000 new jobs. This is an increase from the previous LBHF and London Plan policies which set a target of 5,000 homes to be delivered within the WCOA.
- 8.25 In addition to this, the Draft London Plan, within policy SD1 (Opportunity Areas) outlines an updated housing target for the WCOAPF. The new target, which reflects development that has already been approved or built out, has been increased to 7,000 new homes.
- 8.26 To achieve the housing delivery expected by both the London Plan (including the Draft London Plan) and the LBHF Local Plan, a significant increase in the quantum of housing delivered within the WCOA will need to be planned. Whilst some large-

- scale residential-led planning permissions have been granted within the Opportunity Area, these have not provided significant numbers of new homes.
- 8.27 Specifically, the planning permissions on the BBC, Imperial West, Westfield and WCL development sites combined would provide approximately 4,300 new homes.
- 8.28 There was also a previous planning permission for 1,150 new homes on the Former Dairy Crest site to the north of the site, which would have increased the potential delivery in White City to over 5,100 homes. However, this site is now owned by Imperial College who have submitted a planning application for an academic-led mixed-use development which proposes a much reduced 373 homes.
- 8.29 As a result it is now apparent that the 6,000 residential units envisaged by Local Plan policy WCRA may not be achieved from the key development sites, and delivery could fall even further shy of the 7,000 units required by the Draft London Plan. It is considered that the determination of proposals within the WCOA must be informed by neighbouring planning permissions and the extent to which the overarching strategic aims of the Opportunity Area are likely to be met.
- 8.30 Strategic Policy WCRA provides a target for 10,000 indicative new jobs within the WCOA. In contrast, the Draft London Plan target for indicative new jobs within the opportunity area is 2,000. The variation in the two figures is a result of the Draft London Plan target reflecting developments which have already been built out or approved (the Westfield extension alone is estimated to have created 8,000 new jobs). Throughout the WCOA, since the Opportunity Area designation was established, there has been at least 600,000sq m of commercial floorspace either permitted or currently under determination by LBHF. It is considered the level of employment provided is therefore in-line to meet the expectations of the policy, thereby permitting the repurposing or redevelopment of existing employment sites in order to meet the strategic and local housing objectives.
- 8.31 Officers therefore acknowledge if the emerging target of 7,000 residential units is not met, it would be a missed opportunity within an area which local and strategic London-wide policies require housing delivery to be focussed and maximised. The proposal provides 527 new residential units, including 35% affordable housing, will deliver a much-needed contribution towards the housing targets and is supported by LBHF Local Plan policies WCRA and HO1 and London Plan policies 3.1 and 2.13.
- 8.32 The proposed development will continue to provide some employment space on site, with circa 1,350 sq m (GEA) of commercial floorspace at ground floor level. It is intended that this space will be occupied and managed by Imperial. The Planning Statement confirms it is Imperial's ambition to use the space and its prominent location as a 'front door' to their new White City campus.

It is anticipated that the space will be used for exhibitions, lectures and events which also aim to provide benefit to the public. The ES Socio-Economics chapter outlines that the new commercial floorspace will generate 19 gross direct jobs once complete and operational in addition to a significant number of construction jobs.

- 8.33 LBHF's Local Plan Policy WCRA (White City Regeneration Area) highlights that Imperial is a world-class university which has a reputation for excellence in science, medicine, engineering and commerce and ranks within the top 10 universities in the world. The council supports the opportunity to provide a world-class research/academic/business hub, as it will bring much needed investment to the area. Primary and secondary educational facilities are also encouraged at this location. The policy also outlines that accommodation for students, researchers and staff may be appropriate as part of the overall mix of residential types, sizes and tenures within the WCRA. The proposal, in providing Key Worker affordable homes for Imperial employees, and new flexible use commercial floorspace complies with the aims of Local Plan Strategic Policy WCRA.

Housing Mix and Layout

- 8.34 The proposed development seeks permission for 527 self-contained homes. Policy HO5 (Housing Mix) identifies the breakdown of unit sizes and tenures that developments should aim to meet.
- 8.35 For intermediate housing 50% of units should be 1 bedroom; 35% 2 bedrooms and 15% 3 bedrooms. The development broadly meets the required mix for 1 and 2-bedroom intermediate units. No three bed intermediate units are proposed. This is a result of the affordable housing units being designed for the specific requirements of Imperial employees.
- 8.36 With regard to market housing, Policy HO5 sets out that new housing development should provide a mix of housing including, family housing. The policy does not set out a prescriptive mix that new developments should seek to provide, but suggests a mix of unit sizes including larger family accommodation, subject to viability, locational characteristics and site constraints being considered on a site by site basis.
- 8.37 The proposed scheme would provide a mix of unit sizes and types to ensure that a mixed and balanced community would be achieved. In this regard, the proposal incorporates an appropriate range of one and two-bedroom units as well as larger three-bedroom units suitable for family accommodation. Therefore, the proposed housing mix is considered appropriate to meet a variety of housing needs and current market conditions, and complies with Local Plan Policy HO5.

Affordable Housing

- 8.38 **The NPPF 2019** identifies the Government's support for the delivery of sufficient supply of new homes across all tenures and sizes, including the provision of affordable homes. NPPF Para 64 states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development: a) provides solely for Build to Rent homes; b) provides specialist accommodation for a group of people with specific

needs (such as purpose-built accommodation for the elderly or students); c) is proposed to be developed by people who wish to build or commission their own homes; or d) is exclusively for affordable housing, an entry-level exception site or a rural exception site.

- 8.39 **London Plan Policy 3.9 (Mixed and Balanced Communities)** states that a more balanced mix of tenures should be sought in all parts of London, particularly in neighbourhoods where social renting predominates and there are concentrations of deprivation. **Policy 3.9** goes on to state that communities, mixed and “balanced by tenure and household income, will be promoted across London through incremental small scale, as well as larger scale developments which foster social diversity, redress social exclusion and strengthen communities’ sense of responsibility for, and identity with, their neighbourhoods. They must be supported by effective and attractive design, adequate infrastructure and an enhanced environment”. **Policy 3.10** outlines that homes “should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision”.
- 8.40 **London Plan Policy 3.10** defines affordable housing as: "social rented, affordable rented and intermediate housing (para 3.61), provided to eligible households whose needs are not met by the market. ..." and defines each as follows:
- Social Rented Housing - is owned by local authorities or registered providers, for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Mayor. Social rent is lower than affordable rent.
 - Affordable Rented Housing is that which is let by local authorities or registered providers of social housing and is subject to controls requiring a rent of no more than 80% of the local market rent (including service charges where applicable).
 - Intermediate Housing - is available for sale or rent at a cost above social rent, but below market levels. These can include shared equity (shared ownership and equity loans), other low-cost homes for sale and intermediate rent, but not affordable rent. Households whose annual income is in the range £18,100-£66,000 should be eligible for new intermediate homes. For homes with more than two bedrooms, which are particularly suitable for families, the upper end of this eligibility range will be extended to £80,000. These figures will be updated annually in the London Plan Annual Monitoring Report.
- 8.41 **London Plan Policy 3.11 (Affordable Housing Targets)** sets a London wide affordable housing target of at least 13,200 more affordable homes per year. The policy advises that 60% of new affordable housing should be provided for social or affordable rent and 40% for intermediate rent or sale, with priority accorded to the provision of affordable family housing. The London Plan addresses the introduction of affordable rent, with further guidance set out in the Housing SPG. With regard to tenure split the Mayor’s position is that both social rent and affordable rent should be within the 60%. **London Plan Policy 3.12 (Negotiating Affordable Housing on Individual Private Residential and Mixed-Use Schemes)** seeks negotiation to secure the maximum reasonable amount of affordable housing within new development taking account of the individual circumstances including development viability. **London Plan Policy 3.12** sets out a cascade approach to providing affordable housing. In the first instance it states that

affordable housing should be provided on-site except where it can be demonstrated robustly that this is not appropriate. The policy also states that negotiations should take account of the Site's individual circumstances including development viability. Where it can be demonstrated that affordable housing cannot be provided on site, it may be provided off-site. It goes on to state that a cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing provision and should be ring-fenced to secure additional affordable housing on identified sites or elsewhere in the borough as part of an agreed programme.

- 8.42 **The Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017)** introduced the 'threshold approach' to assessing viability, which does not require supporting viability evidence to be submitted where proposals meet the threshold level of provision. The SPG identifies a 35% threshold for all sites above ten units except (only) for land in public ownership or public use, to which a 50% threshold applies. Paragraph 2.33 justifies this differentiation on the basis that land in public land that is surplus to requirement 'typically has a low value in its current use, allowing higher levels of affordable housing to be delivered'.
- 8.43 **Local Plan Policy HO3 (Affordable Housing)** provides more detailed guidance on the level of affordable housing, stating that housing schemes should increase the supply and improve the mix of affordable housing to help achieve more sustainable communities. Stating that at least 50% of housing units should be affordable, of which 60% should be social or affordable rent and 40% should be for intermediate housing.
- 8.44 **The Draft London Plan** was consulted on between December 2017 and March 2018. Within the context of the above, the most relevant policies are considered to be Draft Policy H5, Draft Policy H10 and Draft Policy H11. **Policy H5** states that 50 per cent of all new homes delivered across London should be affordable. Supporting paragraph 4.5.5 states that affordable housing should only be accepted as an off-site contribution in exceptional circumstances where it can be demonstrated that affordable housing cannot be delivered on-site or where an off-site contribution would better deliver mixed and inclusive communities than an on-site contribution. **Draft Policy H10** relates to the redevelopment of existing housing and estate regeneration states that the loss of housing will only be acceptable where it is replaced at existing or higher densities with at least the equivalent level of overall floorspace and should generally provide an uplift in affordable provision. For estate regeneration schemes the existing affordable housing floorspace should be replaced on an equivalent basis, social rented floorspace should be replaced on a like for like basis and delivery of additional affordable housing should be maximised. **Draft Policy H11** promotes the efficient use of the existing stock of housing by reducing the number of vacant, unfit and unsatisfactory dwellings, including through setting and monitoring targets for bringing properties back into use.

Affordable Housing Tenure

- 8.45 The proposals provide 185 Intermediate Rent units for Key Workers employed by Imperial College London. The applicant proposes that the Key Worker housing is secured at a range of income bands between £30,000 and £60,000. The applicant has agreed to amend the upper income range by lowering the cap to £60,000

(from £65,000). The following table describes the household income ranges, no. of units and the estimated weekly rent of the units (for the below income ranges).

Table 3: Affordable Housing - Affordability Levels

	No. of units	% of units	Estimated weekly rent
households earning less than £30,000 a year	17	9%	£173
households earning less than £45,000 a year	38	21%	£248
households earning less than £50,000 a year	22	12%	£267
households earning less than £55,000 a year	12	6%	£290
households earning less than £60,000 a year	96	52%	£316

8.46 30% of the affordable housing are at rents that are lower than the equivalent Affordable Rent (at Local Housing Allowance levels) for the property type; 9% lower than Social Rents. 83% of the properties are affordable to households on incomes at or below the threshold for the London Living Rent intermediate.

8.47 It is considered that the levels of affordability would ensure that the dwellings are affordable to a range of household incomes. These levels would be secured in perpetuity through the s106 agreement, although it is recommended that the key worker units could be converted to a different affordable tenure if there was no take-up for the units for key workers. This could be secured within a cascade mechanism to be set out in the S106 agreement.

8.48 Imperial College London has issued a letter to the Council and GLA that justifies the provision of key worker housing on the Centre House site, with the housing being offered (in the first instance) to Imperial College Key Workers. Imperial College states:

Imperial competes internationally for the best academic and research talent. The financial context in which UK universities operate limits our ability to offer a salary comparable to our international peers. This is particularly true at senior levels (Associate Professor and Professor) where salaries lag £30k - £50k per annum below our competitors. Combined with the cost of living in London, this is identified by academic departments as a chronic risk to their sustained excellence.

Our strategy to mitigate against this risk is to develop a pipeline of academic talent through the recruitment of early career academics, i.e. at lecturer level, where we are able to compete more sustainably on salary and then develop and grow individuals to become the senior academic leadership of the future. Recruiting at more junior levels, where female academics are better represented, allows us to attract and retain more female scientists and address the pressing issue of gender inequality at the senior levels of academia.

It is also of vital importance that we continue to attract early career research talent, i.e. research associates and fellows; a group of almost 2,500 staff who perform a central role in our research groups. These staff – who typically work on fixed-term

appointments - follow a range of diverse career paths, with many staying in academia but others progressing into roles in STEM industries. Therefore, attracting and retaining this highly skilled group of people is a key priority for Imperial, as they provide the backbone of our integrated innovation district vision for White City.

The College's desire to develop a material portfolio of Key Worker housing is driven by the need to attract the early career staff described above to maintain the academic success of the institution. Having a portfolio of rental units, co-located with our campuses, creates a major attractor for talented young scientists - particularly those re-locating to London - and existing staff considering moving institutions. Subsidised accommodation is an integral part of the comprehensive package of benefits on offer to our staff.

We have operated nine Key Worker units in White City since 2012 and 59 units will be added next year with the opening of Eighty-Eight Wood Lane; Autumn 2020 will see a further 35 Key Worker studios open in North Acton. The volume of applications received for Eighty-Eight Wood Lane in just one month has only reinforced the urgent need to deliver on the affordable housing commitment we have made to our staff community.

The consistently strong demand we have seen across our staff community for Key Worker housing has only underscored the importance of the St James proposal, which will be delivered significantly earlier than our masterplan's proposed residential plots at White City South Campus, given the phased approach taken by our development. The 185 Key Worker units at Centre House would represent a key milestone in our journey to growing this much-needed portfolio of housing.

- 8.49 It is considered that there is sufficient justification provided by ICL to deviate from the Council's preferred affordable housing tenure split of 60% Rented/40% Intermediate which demonstrates (a) there is a need for key worker housing for its staff in London including those who live and work in LBHF, (b) such key workers are seen as vital to the success of the College's emerging development proposals within White City to maintain its status as a world class University; (c) provision of genuinely affordable accommodation for ICL would ensure early career staff are given opportunities to develop within the College and to contribute to the success of the institution and (d) the College is able to attract and retain the best research talent (when competing with other UK based universities) by ensuring staff are not unduly compromised by the extra costs of living in London.
- 8.50 With the combined benefits as listed above, coupled with the revised affordability levels and appropriate mechanisms in the s106 agreement securing that the units are retained as affordable (in perpetuity), it is considered that there is adequate justification to support the proposed affordable housing tenure provisions. It is therefore considered there are appropriate circumstances to allow officers to recommend deviating from the standard affordable housing policy tenure split as advocated in the Local Plan Policy HO3 and London Plan policy 3.10.

Financial Viability Assessment

- 8.51 As the proposed level of affordable housing is below the 50% strategic target set out in Local Plan Policy HO3, a Financial Viability Assessment (FVA) has been submitted in support of this application. Whilst the Applicant has submitted a FVA in compliance with local policy, the Application does not qualify for the 'Fast-Track'

threshold for industrial sites identified in draft Policy H6 of the draft London Plan by meeting the criteria set out in part C of the policy.

- 8.52 The FVA submitted is reflective of current revenues and considers the costs and challenges associated with the individual circumstances of the site. Daniel Watney LLP (DW) has been instructed by the Council to prepare a review of a viability assessment provided by the applicant.
- 8.53 The review carried out by DW demonstrates that with the proposed affordable housing provision of 185 homes the Profit on Cost is 9.61% on a Day 1 basis. Although this is shown to be more viable than the Applicant's Profit on Cost of 6.94% this is still lower than the Benchmark Return of 20% Profit of Cost. Whilst this is an improvement, DW advises that the scheme still cannot provide 35% affordable housing, as offered, viably on a Day 1 basis.
- 8.54 DW advises that the actual viable number of key worker units on a Day 1 basis is 120 as opposed to the 185 which is being offered which equates to 22.7% affordable housing. This comprises a difference of 65 units (ie; a betterment of 12.3%) which is against a target Profit on Cost of 20% (considered to be a reasonable profit reflective of the current climate and level of risks). Under a standard affordable housing model comprising 60% (rent)/40% (intermediate) split, DW advises that the Profit on cost practically halves to 10.7%.
- 8.55 Notwithstanding the above, Daniel Watney advises that under a growth model (whereby property prices rise above levels of build costs), 11 additional key worker units could be provided according to one selected model. However, DW advises that growth models should currently be treated cautiously and reliance on a growth model to justify affordable housing levels would not be consistent with the advice in the Mayor of London's Affordable Housing SPG.
- 8.56 In conclusion, the application was submitted with a FVA that has been reviewed by the council's appointed consultants Daniel Watney. DW consider that, at this point in time, 35% affordable housing provision exceeds that which would be considered the maximum reasonable provision for the development against a target Profit on Cost of 20%. Officers consider that the affordable offer to represent above the maximum reasonable level of affordable housing, which can be viably provided and the betterment offer (of circa 65 units) is significant enough to negate the need for a late stage viability review.

Housing Density

- 8.57 Local Plan policy HO4 'Housing quality and density' sets out that that high-density housing with limited car parking can help ensure housing output is optimised and may be appropriate in locations with high levels of public transport accessibility (PTAL 4-6) provided it is compatible with the local context and the principles of good design and is satisfactory in all other respects.
- 8.58 The application site benefits from a PTAL level of 6a, indicating excellent public transport accessibility. The site is within 280m of two Underground stations which are served by three Underground lines and there are a further six bus routes available on Wood Lane within five minutes walk. In short, the public transport accessibility to this inner London site is exceptional.

- 8.59 The application scheme will provide a site density of 897 units per hectare. Whilst the proposed density exceeds the upper limit of the London density range (within Table 3.2 of the London Plan), the ranges do not need to be applied rigidly. London Plan Policy 3.4 (Optimising housing potential) recognises the scope for higher density residential and mixed-use development within opportunity areas.
- 8.60 The London Plan (2016) suggests that it may be acceptable for a particular scheme to exceed the ranges in the density matrix provided other considerations are suitably addressed. Local context, design, residential quality and transport capacity are important considerations in determining whether the proposed density is acceptable. In this case, it is considered that the high density does not manifest itself in any unacceptable environmental impact in terms of design, residential quality, strategic views or transport impacts. As such, the proposed density is considered to be acceptable.
- 8.61 Furthermore, the Draft London Plan seeks to remove proposed density ranges entirely. Draft London Plan Policy D6 (Optimising housing density) requires development proposals to make the most efficient use of land and to be developed at the optimum density.
- 8.62 The policy outlines that, the higher the density of a development the greater the level of scrutiny of its design, particularly the qualitative aspects of the design and the proposed on-going management. The policy also sets out that boroughs and applicants should use design review to assess and inform design options early in the planning process. Design review should be in addition to the borough's planning and urban design officers' assessment and pre-application advice.
- 8.63 Accordingly, the proposals were presented to LBHF's Design Review Panel in December 2017. Whilst comments received from the panel were supportive and positive, as set out within the supporting Design and Access Statement the design of the proposals have developed to address the comments made by the panel's experts.
- 8.64 Similarly, the applicant has engaged with both LBHF and GLA Design officers prior to the submission of the application. Pre-application design responses have been positive and the proposed density of development is considered to be acceptable.
- 8.65 Given the development's high-quality design, the site's excellent public transport connection and the detailed design reviews which have taken place since the project's inception, and the overarching objective for residential delivery to be optimised within opportunity areas, the scheme's overall density is considered to be acceptable and in compliance with London Plan policy 3.4 (Optimising housing potential).

Design, Appearance and Heritage

- 8.66 **The NPPF (2019)** requires development to respond to local character and history and the surrounding environment and setting, whilst not preventing innovation – but extends this to recognise a role for change and increased densities. The NPPF advocates a positive strategy for conserving and enhancing the historic environment, taking account of (amongst other things) the desirability of new development to make a positive contribution to local character and distinctiveness.

The NPPF state that economic, social and environmental gains are to be sought jointly and simultaneously in order to deliver positive improvements in the quality of the built, natural and historic environment.

- 8.67 **Policy 3.5 of the London Plan** states that housing development should enhance the quality of local places, taking into account physical context, local character, density, tenure and land use mix. **London Plan Policy 7.4** requires developments to provide high quality design responses to existing spaces, to create a positive relationship with street level activity and to allow 'existing buildings and structures that make a positive contribution to the character of a place to influence the future character of an area'. **Policy 7.5** requires public realm to be comprehensive at a human scale through appropriate treatment such as gateways, focal points, landmarks and landscape treatment. Proposals should be informed by the heritage of an area, reinforcing the connection between public spaces and (inter alia) local features that may be of heritage significance. Proposals should further consider integration with high quality public art. **Policy 7.6** sets high architectural standards for all buildings and structures, and requires these to enhance, activate and define the public realm. It allows for materials that complement but do not necessarily replicate the local architectural character.
- 8.68 **Local Plan Policy DC1** states that all development within the borough 'should create a high quality urban environment that respects and enhances its townscape context and heritage assets. There should be an approach to accessible and inclusive urban design that demonstrates how good design, quality public realm, landscaping, heritage assets and land use can be integrated to help regenerate places'.
- 8.69 **Local Plan Policy DC2** permits new build development that is of a high design standard and compatible with the scale and character of existing development and its setting. It requires proposals to respect:
- historical context, townscape and the sense of place of a site;
 - the surrounding area scale, mass, form and grain;
 - the relationship of the proposed development to the existing townscape;
 - local design context to promote and reinforce local distinctiveness;
 - good neighbourliness and principles of residential amenity;
 - local landscape context, providing high quality landscaping and public realm with good permeability where appropriate;
 - sustainability objectives;
 - the principles of accessibility and inclusive design; and
 - the principles of Secured by Design.
- 8.70 **Local Plan Policy DC3** (for Tall Buildings) outlines that the location of tall buildings within opportunity areas including the White City Regeneration Area is considered to be appropriate. Policy DC3 also requires that tall buildings have a positive relationship to the surrounding townscape context and skyline, and

should not have an unacceptable impact on views from and to open spaces or heritage assets.

- 8.71 **Local Plan Strategic Site Policy WCRA1 (White City East)** requires the regeneration of White City East for a mixed use urban quarter within a high-quality environment and that proposals for development should fit within the context of a detailed masterplan, integrate and connect with the surrounding context including land adjacent to the boundary with RBKC. There should be improved permeability and access between Westfield and areas north in the WCRA, particularly through areas of public open space including opening up arches underneath the Hammersmith and City Line railway viaduct, where appropriate. The policy also requires that development should provide a network of green corridors and public open spaces including a local park located centrally of approximately 2ha; and provide high quality places for living and working that are well integrated with, and respect the setting of, the surrounding area;
- 8.72 **Draft London Plan** seeks to secure the delivery of good design through a variety of ways. Going beyond the expectations of the adopted London Plan, Policy D2 does the following. Part C encourages use of digital modelling techniques to analyse potential design options, and to use 3D/virtual reality to inform and engage Londoners in the planning process. Part F requires proposals to go through a design review (which must align with the Mayor's guidance on design reviews) if a scheme is referable to the Mayor and is above the design threshold in Policy D6 or a tall building is proposed in an area where there is 'no local tall building definition'. Part H seeks to ensure design quality is retained through (inter alia) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter, and the use of architect retention clauses in legal agreements 'where appropriate'.

Other guidance

- 8.73 The site sits within the Wood Lane Conservation Area designated in 1991 which was designated primarily to protect the Grade II listed BBC Television Centre.

Demolition of Existing Buildings:

- 8.74 The existing buildings are a group of four, late 20th century office buildings of 4-6 storeys in height, with associated tarmacked car park along the eastern edge. They are arranged in a row, north-south, within a narrow and gently arcing plot which follows the line of the underground line adjacent to the west. The existing pavilion buildings on the site are all of different design, with little architectural merit. No buildings on the site have any recognised heritage value and they make little contribution to the Wood Lane Conservation Area.
- 8.75 The buildings occupy a prominent location within the White City Opportunity Area Planning Framework masterplan, highly visible from Wood Lane and set behind Wood Lane Tube Station (Building of Merit). The masterplan area consists of White City Living (WCL), White City Place, the redevelopment of Television Centre, Westfield and phases 1 and 2 of Imperial's new West London Campus. The WCOAPF identifies that the site is an appropriate location for a tall building, suggesting that a tall building might be set to the south of the site at the entrance to White City Living's public park.

Layout

- 8.76 The proposed development responds to the crescent form of the site's shape with two buildings of similar proportion in plan form reinforcing the gentle crescent. This responds to its immediate setting against the White City Station railway cutting, as well as the curvilinear form of the rotunda of the Grade II listed former Television Centre. Midway along the crescent, a central pedestrian route is introduced between the buildings to Arrival Square on the western half of the WCL masterplan. The route was anticipated in the original masterplans developed to the east and allows for future connectivity to White City Underground Station should a redevelopment proposal come forward for over-station development. The route is marked at this point by 2 towers of 22 and 32 storeys, extending upwards from each side of the crescent. These assist with orientation and wayfinding in the townscape.

Scale, Form and Massing

- 8.77 The simple form of the gentle crescent provides a distinctive overall silhouette to the proposals that will be appreciated in views along Wood Lane. It completes the two distinct blocks which are the early constructed phases of the neighbouring WCL development and serves to complete the perimeter of the blocks. Within the blocks are private gardens which would be shared by the two neighbouring developments.
- 8.78 The massing principles of the scheme result in simple building forms with the height and proportions of the towers relating successfully to the consistent 11 storey shoulder height of each crescent block. The tall buildings are arranged to allow a clear visual separation between the lower southern tower and its taller northern neighbour.
- 8.79 The scale of both towers and their relationship with the existing and emerging context has been carefully evaluated in a townscape and heritage assessment where 17 viewpoints were selected in consultation with LBHF. It is considered that the scale and form of the development are acceptable.

Architecture

- 8.80 The building expresses a distinct base, middle and top. A taller base to the buildings incorporates the more public functions of the buildings, including the space dedicated to Imperial's 'front room', residential entrances & galleries, and ground floor residential accommodation. Transverse bays articulate the long crescent elevations on the 1st to 9th floors and the setback attic level of the 10th floor recedes against the skyline.
- 8.81 The facade design is developed to bring order and coherence to the building massing. The floor construction is expressed externally through projecting pale white bands of precast concrete. Balconies are incorporated between the repeating horizontal band layers. Metal and glass floor-to-floor infill panels clad the exterior, set between the bands with their colour and materiality contrasting with the pale horizontal bands of the concrete. Together these elements balance and define the curving horizontality and subtle verticality of the building. On the

transverse bays, ribbed scalloped metal panels are used to provide contrast to the smooth metal panels used on the crescent façade. Officers consider that the design is refined, coherent and well detailed with high quality materials proposed. The Council's Design Review Panel also concluded that the architectural proposals, urban form, and façade approach were appropriate and well considered.

Townscape

- 8.82 A Townscape, Heritage and Visual Impact Assessment (THVIA) by Tavernor Consultancy has been submitted with this planning application. The THVIA sets out that the proposed development would represent a significant enhancement of what is currently a visually unattractive site. The proposed development would be of high architectural quality and would respond to the new emerging townscape of the WCOA through its distinctive and visually interesting appearance.
- 8.83 The THVIA assesses the impact of the proposed development on 17 viewpoints which were selected in consultation with LBHF. These were based on the viewpoints selected to assess other schemes within the WCOA and were refined in relation to the site and proposed development. All of the viewpoints identified in the WCOAPF were tested.
- 8.84 Of those viewpoints, the most significant is from the forecourt of the Grade II Listed BBC Television Centre. The stepped arrangement of the tallest elements of the proposed development has been carefully conceived to step away from the listed building. The sweeping mass of the proposed linear, lower element responds to the curvilinear composition of the Television Centre mass and forms a part visual enclosure to the forecourt space. The scale of the proposed lower blocks is also commensurate with the blocks that form the Grade II Listed building, the redeveloped eastern wing of which frames the left side of the view. At this close viewpoint, the high-quality design of the proposed development will be evident.
- 8.85 The THVIA also evaluated views from various points on Wood Lane, within the Wood Lane Conservation Area. The proposed development is prominent within this viewpoint close to the site. The THVIA identifies that the lower element will have a sweeping linear character which will respond to the linearity of the main road and gesture towards the lower White City station structure to the west.
- 8.86 The taller elements will step up at the centre of the proposed development, marking the regenerated area to the east and the new routes through the application site, both eastwards through the WCL development and northwards through to the new Imperial campus. The THVIA concludes that the proposed development will be a well composed and high-quality addition to the existing urban streetscape.
- 8.87 The THVIA also considers the impact of the proposed development on more distant views, including the Avondale Park Gardens Conservation Areas and the Oxford Gardens Conservation Area, both of which are in the neighbouring Royal Borough of Kensington and Chelsea.

- 8.88 In terms of the Avondale Park Gardens Conservation Area, the tip of the tallest part of the proposed development would be visible in views from the east side of the central gardens. The tops of modern buildings are already visible above the foreground roofline at positions around the gardens. The THVIA concludes that the character of the buildings and the central landscaped space would not be affected and the significance of the conservation area would be preserved.
- 8.89 The Oxford Gardens Conservation Area is located to the northeast of the site and there will be glimpsed views of the top of the tallest part of the proposed development due to the predominately small scale (2-3 storeys) of development in the area and the orientation of the streets. Whilst very little of the proposed development would be visible, its materials and colour would differ from the Victorian houses in the conservation area, the rich colour and articulation of which would mean that they continue to dominate the foreground. The character and appearance of the conservation area would be unaffected and its heritage significance preserved.
- 8.90 The assessment of heritage, townscape and visual impacts concludes that the proposed development would enhance the townscape and thereby have a predominantly positive effect.

The curvilinear composition and massing of the proposed development relates positively to the form and scale of the Grade II Listed BBC Television Centre and its footprint. The existing buildings on the site have limited architectural merit and their replacement with a responsive urban form and high-quality architecture will enhance the Wood Lane Conservation Area.

- 8.91 Overall, officers consider that the proposed development's impact on the identified key views is not harmful, and is generally considered to be beneficial because of the carefully considered scale and massing and the high quality of the architecture proposed. The proposed development will defer to and preserve the setting of the BBC Television Centre and enhance the character and appearance of the Wood Lane Conservation Area.

Public Realm

- 8.92 The public realm includes provision of a new pedestrian avenue at ground level on the west side, which provides access from Westfield in the south to Imperial College in the north. It is anticipated that this will become a well-used pedestrian route and so ground floor activation is vital. Imperial College are afforded a single, fully glazed continuous space which runs the full length of the southern block that has the potential to activate the ground floor depending on how it is managed. It is anticipated that the space will be used for exhibitions, lectures and events. The northern block has a residential presence along the route provided by elevated ground floor flats with balconies overlooking the route.
- 8.93 Proposals for the public routes are considered to create a legible, attractive, and robust landscape, with clear and accessible links to Imperial to the north. It is considered that the public realm and access to it will be secured within the s106 agreement that will require that the public realm is completed prior to occupation of the development. Overall, the public realm is considered to deliver a high

quality external environment in accordance with Local Plan (2018) Policies DC1, WCRA, WCRA1, OS1 and OS2 and 7.5 of the London Plan (2016).

Landscaping

- 8.94 The landscape strategy is integral to the overall design of the proposed development. The Design and Access Statement provides details of the proposed form, materials and the envisaged uses of the external spaces surrounding the new buildings. The landscaping to the eastern elevations of the building adjoins the landscaping works being implemented within the private courtyards of phases 1D and 2 of the WCL development. These spaces benefit from approval for the landscape works and the landscaping associated with Centre House results in a continuation of this form/type.

The landscaping within the public realm associated with Centre House, comprising the pedestrian north-south and east-west routes takes inspiration from the Japan-British Exhibition which took place in White City in 1910, and which included two large Japanese Garden displays.

- 8.95 Plants will be carefully arranged to create a pleasant mix of evergreen and deciduous species to create year-round interest with colour, texture and flowering character. The selected trees, including Bonsai style pine trees and Japanese cherries will be reminiscent of Japanese landscapes with low-spreading canopies with generous foliage and flowering periods.
- 8.96 At present, almost all the site consists of hard-standing with minimal ecological interest. The proposals will transform the site by incorporating new green landscaped areas to encourage biodiversity.
- 8.97 New gently winding walkaways along the western and eastern sides of the site will create well defined, accessible routes, to the Imperial Campus to the north and into WCL to the east. Raised planters, a water rill feature and contemporary horizon fencing will screen the rail lines to the west of the site, whilst also creating visual interest.
- 8.98 To the east of the site, and shared with WCL, new lawns will provide space for relaxation, informal activity and age specific play equipment. The s106 agreement will contain provisions to ensure that the external private courtyard areas are accessible to residents in Centre House. At eleventh floor level of the southern Centre House building a residential roof garden is proposed. It is considered that the proposals will provide a high quality landscaped roof garden for all future residents, with panoramic views of West London. The proposed landscaping associated with the Centre House development is in accordance with Local Plan (2018) Policies DC1, WCRA, WCRA1, OS1 and OS2 and 7.5 of the London Plan (2016).

Heritage

- 8.99 **NPPF Paragraph 192** which advises that, in determining planning applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. **Paragraphs 193 and 194** states that when

considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the asset's conservation; the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or through development within its setting. **Paragraph 196** of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. **Paragraph 197** states that a balanced judgement will be required having regard to the scale of any harm or loss and the significance of a non-designated heritage asset. **Paragraph 200** of the NPPF states that Local Authorities should look for opportunities for new development within Conservation Areas to enhance or better reveal their significance.

- 8.100 Officers have considered the proposals for demolition of the existing buildings and have determined that the demolition of the Centre House buildings would cause no harm to the character and appearance of the Wood Lane Conservation Area, partly due to the very limited contribution that the existing buildings presently make to the conservation area. Officers have given considerable weight to the fact that no harm will be caused by the proposed demolition in reaching its conclusions. It is also considered that the replacement development would enhance the character and appearance of the conservation area thereby having a positive effect on the surrounding townscape and heritage assets.
- 8.101 Officers have applied the strong presumption (as required to do so under the Planning (Listed Buildings and Conservation Areas) Act 1990 statutory duty in Sections 66 and 72 to assess the impacts on heritage assets including conservation areas and listed buildings. Officers have also considered the conclusions of the TVIA in the ES in this regard (which are set out in this report) and have applied the statutory duty accordingly. Officer's assessment of the level of harm to the character and appearance of the conservation area is a matter of planning judgement and the following section will address these matters in detail.
- 8.102 It considered that the proposed development responds positively to the heritage assets within the townscape setting by the virtue of the crescent form of the architecture which emphasises the curvilinear shape of the site and by virtue of the appropriate shoulder height of the buildings which respects the setting of the emerging development to the east and the height and form of the heritage assets in proximity to the development, without appearing overly assertive or dominant. The tallest elements are positioned in the centre of the site which are sufficiently distant from the Grade II listed Television Centre which preserves the setting.
- 8.103 It is therefore considered that the proposed development, would cause no harm to the character or appearance of the conservation area and setting of the nearby listed and locally listed buildings in accordance with paragraphs 192, 193, 194, 196 and 197 of the NPPF (2019).
- 8.104 In coming to a view on the heritage impacts, officers have given due regard in any case, to the significant townscape, urban design and regeneration benefits of the proposals. The impact of the proposal, on the historic significance, visual amenity, character and appearance of these areas, in particular Wood Lane Conservation Area and setting of the Grade II listed buildings and locally listed

buildings in the area, is considered acceptable. The proposed development is therefore considered to be acceptable and would be in accordance with policies 7.4, 7.7 and 7.8 of the London Plan (2016), Local Plan policies WCRA, WCRA1, DC1, DC2, DC3 and DC8 and the Council's Planning Guidance Supplementary Planning Document and White City Opportunity Area Planning Framework (2013).

Amenity Considerations

Amenity of Surrounding Residents

- 8.105 Local Plan policies DC2 (Design of New Build) and HO11 (Detailed Residential Standards) set out that the Council will ensure that the design and quality of all new housing is of a high standard and that developments provide housing that will meet the needs of future occupants and respect the principles of good neighbourliness. The quality of the accommodation and the development's impacts on neighbouring occupiers are considered within the following sections. Particular regard has been given to the impacts on the closest residential areas that comprise the Wood Lane Estate (approx 70m to the north-west of the site) and the emerging development at White City Living which (Phases 1 and 2) lie immediately to the east. The properties on Wood Lane which would have views of the development are 103-155 Wood Lane and a detailed assessment of the impact on these properties including a daylight and sunlight assessment.

Privacy and Overlooking

- 8.106 The Council's Planning Guidance SPD (2018) sets an 18m standard from windows in new development to existing windows, in order to protect privacy. The SPD clarifies that the 18m distance will be measured by an arc of 60 degrees taken from the centre of the proposed new window to ensure that there is no loss of privacy to neighbouring occupiers.
- 8.107 There are no existing residential properties within 18m of any elevation of the development, with the closest dwellings being on Wood Lane circa 70m to the north-west. It is considered that the gap between the development and these properties would ensure that no loss of privacy or significant overlooking would occur to existing properties.
- 8.108 The proposals are located adjacent to Phases 1D and 2 of the emerging White City Living Development to the east, under-construction, where the west facing elevations contain windows will overlook Centre House and vice versa. This relationship is consistent with the typical distances between facing buildings within masterplan consented through the White City Living planning permission. In any case, there are only occasional instances whereby there are windows within 18m of the Centre House development, which is not uncommon in a high-density urban setting.
- 8.109 The northern elevation of the north block is also set back from the site boundary to align with the adjacent blocks in the WCL development. There are no properties directly adjacent at present, but with the potential for the site to the north (former Dairy Crest) coming forward consideration has also been given to the likely form of development on this site. As the adjacent WCL development is

set back 9m from the boundary, this is repeated within the north block of the Centre House proposals. Therefore, it is reasonable to conclude that the ICL led development of the Dairy Crest site would follow this same principle in order to match the 9m between the building and site boundary. The resulting relationship at its closest would be 18m which is in line with the minimum SPG guidelines.

- 8.110 It is considered that the overall level of compliance with the minimum “18m guideline” across the development is high. Whilst there are a few examples of dwellings with windows closer to each other (for instance – between the north and south facing elevations of the two buildings), the site is within an Opportunity/Regeneration Area within both local and strategic policies encourage residential densities to be optimised where high quality design is delivered.
- 8.111 It is considered that future occupiers will be aware of the site’s dense urban environment, when taking occupation within the development and they are therefore, likely to have different expectations in terms of the privacy levels within the apartments. It is also likely that residents would place more weight on the locational benefits of the site and other qualities of the development, above privacy, which is set out in established planning decisions within similar dense urban environments. It is considered that the relationship between the proposed development, and emerging WCL development and the existing dwellings on Wood Lane is acceptable on balance.

Daylight, Sunlight & Overshadowing, and Solar Glare

- 8.112 LBHF Local Plan policy HO11 (Detailed Residential Standards) sets out that in order to achieve a high standard of design, proposals should take into account the protection of existing residential amenities, including daylight and sunlight.
- 8.113 The Council’s Planning Guidance SPD provides further guidance on the application of policies within the Local Plan. Paragraph 3.15 of the SPD outlines that because LBHF, as a borough, has a high density of development it is necessary to ensure that in the siting and design of all new buildings and extensions, the amenities of existing residential occupiers are not unduly affected.
- 8.114 Policy 3.5 of the London Plan expects housing developments to be of the highest quality, internally and externally. Guidance on the application of Policy 3.5 is provided by the Mayor’s Housing SPG (2016). The SPG echoes Policy 3.4 of the London Plan, which seeks to optimise housing output, and recognises that in achieving optimum housing delivery that “an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight within new developments.
- 8.115 Emerging policies at local and strategic level advise that the BRE Guidelines should be applied flexibly to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.”

- 8.116 The Housing SPG at paragraph 1.3.46 goes on to state that “The daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity.”
- 8.117 Paragraph 2.3.47 of the Housing SPG states “BRE guidelines on assessing daylight and sunlight should be applied sensitively to higher density development in London, particularly in central and urban settings, recognising the London Plan’s strategic approach to optimise housing output (Policy 3.4) and the need to accommodate additional housing supply in locations with good accessibility suitable for higher density development (Policy 3.3). Quantitative standards on daylight and sunlight should not be applied rigidly, without carefully considering the location and context and standards experienced in broadly comparable housing typologies in London.”
- 8.118 The planning application is supported by a Daylight and Sunlight and Overshadowing Assessment by Anstey Horne which forms Chapter 14 of the Environmental Statement. This technical assessment uses the methods set out in the Building Research Establishment’s (BRE) “Site layout planning for daylight and sunlight: A guide to good practice” to analyse the impact of the proposals on existing and future neighbouring residential properties within the surrounding area. The ES has carried out a daylight assessment comprising the Vertical Sky Component test and Daylight Distribution/No Sky Line test to examine the change of daylight levels as a result of the Centre House development. The ES has carried out an Annual Probable Sunlight Hours (APSH) test in assessing the changes to sunlight levels. The ES has also carried out an assessment of overshadowing of the nearby (existing and future) amenity spaces. A description of these tests is set out in the ES, but these are considered to represent the accepted tests from which to carry out a comprehensive planning assessment of the daylight, sunlight and overshadowing impacts of the development.
- 8.119 Specifically, the ES Assessment considers the following range of potential scenarios which could affect the daylight and sunlight within both existing and future identified receptors.
- Current Baseline condition (the existing conditions in the receptors)
 - Future Baseline condition (with Scenarios A and B);
 - Proposed development – current and future occupiers for Scenarios A and B (with Centre House)
- 8.120 The ES also considers the cumulative ‘interactive’ and ‘combination’ effects in Chapter 17 against the current baseline condition (ie: the change from the current baseline with no development to the cumulative scenarios with all nearby developments and Centre House). It is considered the approach adopted in the ES is sufficiently robust to properly consider the impacts on daylight and sunlight levels (and overshadowing of amenity areas) in existing properties, in order to examine whether any material harm to the living conditions will occur, as a consequence of the Centre House development. The approach is also considered sufficiently robust to assess the potential effects on future occupiers

within adjoining developments and the potential effects on amenity spaces within the developments.

- 8.121 The Assessment uses a number of different methods to consider daylight and sunlight impacts and overshadowing impacts. The BRE stresses that the numerical values are not intended to be prescriptive in every case and are intended to be interpreted flexibly depending on the circumstances. The Assessment considers the impacts on the existing receptors at No's 103-155 Wood Lane (within the Wood Lane Estate) in the vicinity of the proposed scheme as well as the future receptors of the neighbouring developments within WCL Phases 1 and 2 and in the Former Dairy Crest Site (both the extant permission (Future Scenario A) and the scheme currently pending consideration by LBHF (Future Scenario B) were assessed).
- 8.122 The following paragraphs examine the effects upon the nearest residential properties on Wood Lane further.
- 8.123 The Assessment concludes that vast majority of properties on Wood Lane are largely unaffected by the Centre House proposals and would achieve high levels of compliance with daylight and sunlight criteria. The only properties that receive daylight levels and sunlight levels (in Future Scenarios A and B), to windows and rooms below the recommended BRE standards are the following addresses:
- 103 Wood Lane
 - 111 Wood Lane
 - 113 Wood Lane
 - 119 Wood Lane
 - 123 Wood Lane
 - 127 Wood Lane
 - 133 Wood Lane

Daylight Results

- 8.124 For Daylight, (in Future Scenarios A and B) the VSC results show that 55 (96%) of the 57 windows tested for VSC will satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former value. Of the remaining two windows, both will achieve factor former values ranging between 0.79 and 0.60. In the proposed development scenario, the VSC results show that 54 (95%) of the 57 windows tested for VSC will satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their factor of former values. Of the remaining three windows, two will achieve factor of former values ranging between 0.79 and 0.60 and one between 0.59 and 0.40.
- 8.125 The daylight distribution results show that 34 (97%) of the 35 rooms assessed will satisfy the BRE guidelines by retaining in excess of 0.8 of the former value, with the majority of rooms experiencing no change in day-lit area in Future Scenarios A, and 33 (94%) of the 35 rooms assessed achieve the guidelines in Scenario B. The daylight distribution (in the proposed development scenario) results show that all 35 rooms assessed (100%) will satisfy the BRE guidelines by retaining in excess of 0.8 the former value, with the majority of rooms

experiencing no change in day-lit area. Both sets of results are comparable with the daylight distribution results achieved in the baseline condition.

- 8.126 For properties achieving full adherence, the overall effect from the proposed development is considered of negligible significance. The properties that have levels below the BRE guidelines (when compared against all scenarios are discussed in the following paragraphs:

103 Wood Lane

- 8.127 This property is situated within a terrace of properties located on Wood Lane to the west of the site. There is a total of two windows serving one room which has been considered for daylight. One of the two windows tested will satisfy the BRE criteria for VSC in the proposed development scenario with the other window narrowly missing the guideline target retaining 0.79 times its former value. However, the rooms served by this window meet the guidelines for daylight distribution. The daylight distribution results show the room served by these windows satisfies the BRE guidelines. It is therefore considered that the overall effect of the proposed development on this property will be of negligible significance and the change would not be harmful to living conditions or residential amenity of the occupiers. The property is not reported to experience any BRE transgressions in the baseline Scenarios A or B.

111 Wood Lane

- 8.128 This property is situated within a terrace of properties located on Wood Lane to the west of the site. The VSC results show the three windows tested in this property will satisfy the BRE guidelines in the proposed development scenario. There is a total of three rooms tested in this property for daylight distribution. The results show the room on the ground floor served by these windows will narrowly miss the guideline target retaining 0.79 times its former value (in Scenario B). The remaining rooms will adhere to the BRE guidelines. However, the results show all the windows serving this room will satisfy the BRE guidelines. It is therefore considered that the overall effect of the proposed development on this property will be of negligible significance and would not be perceptible to the residents in the proposed development or scenario A or B contexts.

113 Wood Lane

- 8.129 This property is situated within a terrace of properties located on Wood Lane to the west of the site. The VSC results show the three windows tested in this property will satisfy the BRE guidelines in the proposed development scenario and in cumulative scenarios A and B. Three rooms have been tested in this property for daylight distribution. The results show the room on the ground floor served by these windows will narrowly miss the guideline target retaining 0.79 times its former value (in Scenarios A and B). The remaining rooms will adhere to the BRE guidelines. However, the results show all the windows serving this room will satisfy the BRE guidelines. It is therefore considered that the overall effect of the proposed development on this property will be of negligible significance in ES terms, and the change would not be harmful to living conditions or residential amenity of the occupiers.

119 Wood Lane

- 8.130 This property is situated within a terrace of properties located on Wood Lane to the west of the site. There is a total of three windows serving one room considered for daylight. Two of the three windows tested will satisfy the BRE criteria for VSC, with the other window missing the guideline target retaining 0.6 times its former value (in the proposed development scenario) and 0.71 times its former value (in scenarios A and B). However, the results show this window is already poorly lit in the existing condition and is therefore more sensitive to changes in the light levels.

Notwithstanding this, the level of change is considered to be low and the room would still benefit from two BRE compliant windows ensuring it will not be unduly compromised by the development in the cumulative context. This is also underlined by the daylight distribution results that show the room served by these windows satisfies the BRE guidelines in the proposed development scenario and in scenarios A and B. It is therefore considered that the overall effect of the proposed development on this property will be of negligible significance and the change would not be harmful to living conditions or residential amenity of the occupiers.

127 Wood Lane

- 8.131 This property is situated within a terrace of properties located on Wood Lane to the west of the site. There is a total of three windows serving one room which has been considered for daylight. Two of the three windows tested will satisfy the BRE criteria for VSC, with the other window narrowly missing the guideline target retaining 0.68 times its former value (in the proposed scenario), 0.78 (in Scenario A) and 0.78 times its former value (in Scenario B). However, the results show this window is already poorly lit in the existing condition and is therefore more sensitive to changes in the light levels. Notwithstanding this, the level of change is considered to be low and the room would still benefit from two BRE compliant windows ensuring it will not be unduly compromised by the development. This is also underlined by the daylight distribution results that show the room served by these windows satisfies the BRE guidelines. It is therefore considered that the overall effect of the proposed development on this property will be of negligible significance and the change would not be harmful to living conditions or residential amenity of the occupiers.

Cumulative Daylight Effects in Development Scenarios (A and B)

- 8.132 Chapter 17 of the ES confirms that 19 out of the 27 properties on Wood Lane are reported to contain windows (32 out of 57 windows) which would not satisfy the BRE guidelines in the cumulative development scenarios (A) for VSC (daylight) with the majority of transgressions being relatively minor and not significant in ES terms. For cumulative development scenario B, 42 out of 57 affected windows within 27 properties would not satisfy the BRE guidelines, again with the majority of transgressions being relatively minor. 22 out of the same 27 properties are reported to pass the daylight distribution BRE test in cumulative scenario A, whilst 23 of the 27 properties pass the daylight distribution test in scenario B, which indicates that daylight levels (within existing receptors) within the cumulative context are satisfactory. Only 1 moderate adverse impact

is recorded to a kitchen window in 119 Wood Lane (in both cumulative scenarios). Considering the optimum scale of development and regeneration in proximity to existing residential buildings, the overall level of impact is considered to be low. The resultant levels of daylight within existing properties in Wood Lane are considered to be good for a location which is designated for substantial regeneration and growth, and that will deliver substantial social, economic and environmental improvements to the area.

- 8.133 Officers consider it is important to consider the cumulative scenarios as these represent worst-case scenarios; ie: with all developments in-situ. This is an ES requirement and officers have duly taken into account the cumulative impacts in coming to an overall view on daylight impacts.
- 8.134 In conclusion, in the current baseline condition only 77% of the windows tested in the Wood Lane properties tested achieved the target 27% VSC. This is due to the inhibiting design of the neighbours and the fact they are located in an urban context. Notwithstanding this, the results in all scenarios are comparable and the resulting daylight levels within the Wood Lane properties are considered to be appropriate to the urban setting. The inclusion of Centre House does not materially reduce the light levels beyond those recorded in the existing condition and will not be harmful to residential amenity when considered against the cumulative scenarios and against the non-cumulative scenario.

Sunlight Results

- 8.135 This section summarises the sunlight effects of the proposed development on the current sensitive receptors once completed and occupied in the future baseline Scenarios A and B (with ICL development). There are 5 x properties in the vicinity of the proposed development that have windows that face within 90° of due south and have been assessed for sunlight are identified in the ES.
- 8.136 In the non-cumulative proposed development scenario, out of the 5 windows tested, two (40%) will satisfy the BRE criteria for annual sunlight and three (60%) will satisfy the winter sunlight criteria. In the existing baseline condition only 3 of the 5 windows tested achieved the 25% target for annual sunlight and only 1 of 5 windows tested achieved the 5% target for winter sunlight. The ES considers the lower existing sunlight levels is due to the inhibiting design of the neighbouring receptors and the urban context. The following properties do not satisfy the BRE criteria in respect of sunlight as reported in the ES:

119 Wood Lane

- 8.137 In the proposed development scenario, one south-facing window has been assessed for sunlight in the ES. The window shows no change from the existing condition for winter APSH but falls below the annual APSH criteria with a ratio reduction of 0.13. The existing sunlight value is already low at 8%, so the expectation of sunlight will not be high, and the actual reduction is only seven percentile points. It should also be noted that the room is referenced as a kitchen and the guidelines consider that sunlight to such rooms is less important. On this basis it is therefore considered that the effect of the proposed development on this property will be of minor adverse significance (in the proposed

development scenario), which is consistent with the conclusion in Chapter 14 of the ES.

123 Wood Lane

- 8.138 In the proposed development scenario, one south-facing window has been assessed for sunlight in the ES. The window tested will achieve a factor of former value of 0.69 for annual sunlight and 0.50 for winter sunlight. The annual sunlight level received by this window is only 3 percentile points below the 25% APSH target. In the winter condition, the existing value to this window is low at 4% APSH, reducing to 2% APSH in the proposed condition. This represents a small change of only 2 percentile points. Therefore, the low levels of winter sunlight in the existing condition are responsible for the high ratio reductions in the proposed. It should also be noted that the room served by this window will also be served by additional windows that, whilst within 90° of due north will still offer up some sunlight. On this basis it is therefore considered that the effect of the proposed development on this property will be of minor adverse significance (in the proposed development scenario).

133 Wood Lane

- 8.139 In the proposed development scenario, one south-facing window has been assessed for sunlight. The window tested will achieve a factor of former value of 0.75 for annual APSH and 0.5 for winter APSH criteria. The annual sunlight level received by this window is only 1 percentile point from achieving the 25% APSH target. In the winter condition, the existing value to this window is low at 4% APSH, reducing to 2% APSH in the proposed condition. This represents a small change of only 2 percentile points. Therefore, low levels of winter sunlight in the existing condition are responsible for the high ratio reductions in the proposed. It should also be noted that the room served by this window will also be served by additional windows that, whilst within 90° of due north will still offer up some sunlight. On this basis it is therefore considered that the effect of the proposed development on this property will be of minor adverse significance (in the proposed development scenario).
- 8.140 Notwithstanding the above, out of the 5 windows tested, 5 (100%) will satisfy the BRE criteria for annual sunlight and 5 (100%) will satisfy the winter sunlight criteria in respect of retaining values above 0.8 times their formal value (in the Future Scenarios A and B). Therefore, it can be concluded that the inclusion of Centre House has not materially changed the existing sunlight results.
- 8.141 It is therefore considered that the overall effect of the proposed development for these properties will be of negligible significance, with most of the adverse impacts being minor and not significant in ES terms. As a result, the change to sunlight levels would not be harmful to living conditions or residential amenity of the occupiers in the proposed development and future scenarios A and B.

Cumulative Sunlight Effects in Scenarios A and B

- 8.142 ES Chapter 17 confirms that in both cumulative scenarios A and B, out of the 5 windows tested, two (40%) will satisfy the BRE criteria for annual sunlight and three (60%) will satisfy the winter sunlight criteria. In the existing baseline

condition only 3 of the 5 windows tested achieved the 25% target for annual sunlight and only 1 of 5 windows tested achieved the 5% target for winter sunlight. The ES considers the lower existing sunlight levels is due to the inhibiting design of the neighbouring receptors and the urban context. It is also noted that the results for the cumulative development scenarios A and B on sunlight will be of the similar significance as reported in the proposed development (non-cumulative) scenario. As such, the inclusion of Centre House does not materially reduce the sunlight levels to a degree well beyond those recorded in the existing condition and will not be harmful to residential amenity when considered against the cumulative scenarios and against the non-cumulative proposed development scenario.

Overshadowing to existing surrounding amenity spaces

- 8.143 The following sensitive receptors were assessed for overshadowing in the baseline condition:
- BBC Media Village (at the junction of South Africa Road and Wood Lane) – Amenity Area 1; and
 - BBC Media Village (at the junction of South Africa Road and Wood Lane) – Amenity Area 2;
- 8.144 The results in the proposed development scenario condition confirm that all (100%) of the two amenity spaces tested would receive at least 2 hours of direct sunlight to well over 50% of their areas on March 21st. The results are comparable with those of the existing baseline condition. On this basis it is therefore considered that the effect of the proposed development on the existing amenity areas will be of negligible significance.
- 8.145 The transient overshadowing assessment has been carried out for the future amenity spaces in future scenario A & B. The ES considers the following amenity areas and the assessment shows that:
- Amenity Area R1/1510 will receive sunlight between 12noon and 2pm on 21st December, 9am to 4pm on 21st March, and 8am to 4pm on 21st June;
 - Amenity Area R1/1000 will receive sunlight between 12noon on 21st December, 12noon on 21st March, and 11am to 1pm on 21st June; and
 - Amenity Area R2/1000 will not receive sunlight on 21st December, will receive sunlight between 2pm to 3pm on 21st March, and 10am to 3pm on 21st June.
- 8.146 The results show that there is evidence of overshadowing caused by the proposed scheme but this is limited to the southern section of the proposed amenity area. Therefore, it is considered that the effect of the proposed development on the future amenity areas will be of negligible significance and officers do not consider the change to constitute material harm to living or working conditions or residential amenity of occupiers or visitors using the existing amenity spaces, that would conflict with the local planning policies and strategic policies for the Regeneration Area.
- 8.147 The ES also considers the impact of the Centre House scheme on the Former Dairy Crest site to the north. The ES concludes that the adjoining development would achieve comparable levels of adherence with the BRE's daylight and

sunlight guidelines as it would in the event that the Centre House site remained undeveloped. In summary, the inclusion of the proposed Centre House development does not present a material reduction beyond the effects already caused by the other surrounding consented developments.

- 8.148 Officers consider that it is important that any evaluation of the daylight and sunlight impacts on existing and future occupiers must be considered in the context that the existing site is an underdeveloped plot which is part of the WCRA within which planning policies encourage the optimisation of density of developments. Accordingly, the height and massing of the proposed development is comparable with other nearby consented schemes including Westfield, BBC Television Centre, White City Place, Woodlands (ICL) and the adjacent WCL development.
- 8.149 Whilst the proposals will result in daylight and overshadowing impacts on WCL Phases 1 and 2 it should be considered that the positioning of the proposed development in relation to these phases is comparable with the relationship between blocks in other surrounding consented schemes. In the case of WCL Phase 2, the closer of the two Phases assessed, the results for the west elevation with the proposed development in place are comparable with those on the eastern elevation, which faces towards the outline consented blocks of Phases 3 to 5 WCL.
- 8.150 With regard to sunlight, a number of windows within Phases 1 and 2 would not meet the BRE guidelines for Annual Probable Sunlight Hours (APSH); this is the measure of sunlight that a given window may expect over a year period. To an extent this is as a result of the scale of the facing Centre House buildings in addition to the presence of balconies which form part of the design of the WCL phases 1 and 2. The balconies are required, for planning policy compliance, and to provide amenity space as well as acting as mitigation to prevent overheating. These balconies serve to limit the available view of sky, thus reducing the amount of light reaching the window. Notwithstanding this, it is considered the relationship would be acceptable in this high-density Opportunity/Regeneration Area in order to optimise residential quantum that is provided at a good overall standard.

Solar Glare:

- 8.151 An assessment has been carried out to show the likelihood of solar glare occurring at six test points in the vicinity of the site as a result of the proposed Centre House development. The assessment of solar glare from the elevations of Centre House has been carried out in the proposed baseline condition, not accounting for future schemes coming forward. As other schemes come forward the ES forecasts that they will in part obstruct the view of Centre House and lessen the potential for solar glare reflectivity off some elevations of Centre House.
- 8.152 The ES results for the points tested show that solar glare does not occur within the 3° radius of the foveal vision area. In the instance of View 2 at the junction of South Africa Road and Wood Lane heading south, while the assessment does show solar glare is likely to occur behind the traffic lights on the left side of the road heading in a southerly direction, the traffic flow is controlled by two further

signals located on the right side of the road. The assessment shows that these two signals are not within the proximity of the 3° radius foveal vision area.

Conclusions

- 8.153 The overall effects of the proposed development, upon existing occupiers within nearby properties and future occupiers within the adjacent developments are considered acceptable, on balance, given the location of the site is within an urban inner-city opportunity area, designated for tall residential development, where rigid application of the BRE guidelines would be inappropriate and would not enable development. As a result, a more flexible approach is considered justified when determining the overall effects of proposed development on the level of daylight, sunlight and overshadowing to current and future sensitive receptors.
- 8.154 Accordingly, and on balance, the proposed development is considered to comply with LBHF Local Plan policy HO11 (Detailed Residential Standards) which expects developments to achieve a high standard of design, proposals should take into account the protection of existing residential amenities, including daylight and sunlight, overshadowing and solar glare.

Internal Daylight and Sunlight for Future Occupiers

- 8.155 A Daylight and Sunlight within the Proposed Development report is submitted with the planning application and provides an analysis of the internal light levels within the new homes. The Report assessed the daylight and sunlight to almost half of the habitable rooms within the proposed development. This reveals that 75% of the rooms tested would meet or exceed the BRE target values for daylight. The Planning Statement suggests that this is a very high level of adherence for a large, dense development within an inner London location and it is recognised that there are locations in LBHF whereby daylight is reduced given the density of the more urban/central parts of the borough.
- 8.156 In terms of sunlight, in accordance with the BRE guidelines the design of the proposal seeks to avoid providing north-facing homes, with the elevations of Centre House principally facing east and west. However, as the site is a long, thin plot running from north to south, the orientation restricts the number of windows facing in a southerly direction, therefore higher sunlight levels cannot often be achieved.
- 8.157 In addition, the report shows that projecting or recessed balconies restrict sunlight received within the development. However, it must be noted that whilst the balconies limit sunlight they provide valuable amenity space for every new home and are required to meet local planning policy requirements. Furthermore, whilst the sunlight reaching the balconies is not included within the assessment of internal light levels it will contribute to the perception of sunlight for future residents.
- 8.158 The level of sunlight received within the development is considered to be acceptable for a large development within a dense urban location and the new

homes will provide a satisfactory level of natural light in accordance with LBHF Local Plan policy HO11.

- 8.159 **Conclusions on Residential Amenity:** It is considered that the proposed development, would not result in significant harm to the amenities of adjoining occupiers in terms of daylight/sunlight, over-shadowing, and privacy. It is considered that the proposals, have been designed so that they do not unduly prejudice the development potential of the adjoining sites, including the adjoining White City Living development which have the capacity to contribute towards the comprehensive regeneration of the Opportunity Area, by virtue of the extent of the daylight, sunlight, overshadowing and privacy impacts. In this regard, the development would respect the principles of good neighbourliness. The proposed development is therefore considered to be acceptable and would be in accordance with policies 3.5, 3.6, 3.8, 7.3, 7.6, 7.7, 7.14 and 7.15 of the London Plan (2016), Local Plan policies HO11, DC1, DC2 and DC3 and the Council's Planning Guidance Supplementary Planning Document and White City Opportunity Area Planning Framework (2013).

Standard of Residential Accommodation

- 8.160 The proposed dwellings have the following proposed internal area ranges:

- Studios: 37-43 m²
- 1 Bedroom Flats: 50-55m²
- 2 Bedroom Flats: 61-81m²
- 3 Bedroom Flats: 86-144m²

- 8.161 Therefore, all dwellings exceed the minimum internal space standards, as required in policy 3.5 of the London Plan. Floor to ceiling heights within all primary habitable areas are at least 2.5m in height. This accords with the requirements for the standard of accommodation as set out within London Plan policy 3.5. In accordance with Standard 12 of the Mayor's Housing SPG each residential core within the proposed development would serve no more than 8 units on each floor.

Outdoor Amenity Space

- 8.162 Local Plan Policy HO4 (Housing Quality and Density) states that family housing on upper floors should have access to a balcony and/or terrace. The Mayor's Housing SPG requires 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant; the minimum depth of balconies should also be 1500mm.
- 8.163 The proposals maximise outdoor amenity space for the residential units, with all the units benefitting from private amenity space. This is in the form of various sized balconies, with some larger terraces on the upper floors. These exceed the minimum standards as set out in the Mayor's Housing SPG.

- 8.164 In addition, the proposal benefits from landscaped communal amenity areas at twelfth floor level of the southern block. This will provide circa 600 sq m of additional landscape communal amenity space for residents with outstanding views across London. Not every resident is expected to use the roofspace and so some residents may opt to frequent the external private residential courtyards within the WCL development being constructed as part of phases 1D and 2. The use of these areas for Centre House residents would be secured within the s106 agreement.
- 8.165 In addition, the new dwellings will benefit from the 1.5ha of easily accessible and well-designed public open space which is being provided within the adjoining WCL development, in addition to the local public spaces at Television Centre Forecourt and Helios (and Hammersmith Park beyond), Westfield (Relay Square) and Imperial College (Woodlands) and potentially the Dairy Crest site campus. It is considered that the development is well served by local public spaces that provide additional amenity space for the Centre House residents.

Playspace

- 8.166 Local Plan Policy OS3 (Playspace for Children and Young People) states that in new residential developments which provide residential units suitable for families, communal playspace will be required on-site which is suitable for a range of ages and requirements. The GLA's Supplementary Planning Guidance (SPG) 'Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation' (2012) recommends that 10 sq m of play and recreation space is provided for children and young people in new developments.
- 8.167 Using the GLA benchmark provided within the Mayor's Play and Informal Recreation SPG the requirement for the proposal would be 350 sq m of dedicated playspace provision. This would serve the 35 children estimated to reside within the proposed development once completed and fully occupied.
- 8.168 The playspace requirements for the proposed development and the neighbouring WCL are delivered on-site together. Whilst some of the playspace for the proposed development is delivered at ground floor level in front of the northern block and on the southern block's roof garden level, the majority is provided within the WCL site. The landscape drawings demonstrate that, between the two sites, the policy compliant 350 sq m of child play space for the proposed development is provided, as well as the full playspace provision for WCL.
- 8.169 In addition, Chapter 16 (Socio-Economics) of the Environmental Statement includes a baseline analysis of the local area which indicates that there is currently a good provision of child play space for children aged 5 years and above, including five play spaces within 400m and a further five play spaces within 800m of the site. The five playspaces within 400m of the site are White City Close Playground, Exhibition Close Playground, Vine Square Playground, Linacre Court Playground and Hammersmith Park Playground.
- 8.170 As the proposed development will accommodate its child playspace requirements on-site, and is also proximate to a number of other play areas suitable for children over 5 years of age, it is considered that the proposal

complies with Local Plan policy OS3 and the requirements of the GLA's Playspace SPG.

Transportation and Highways

- 8.171 **The NPPF (2019)** requires that developments which generate significant movement are located where the need to travel would be minimised, and the use of sustainable transport modes can be maximised; and that development should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. The NPPF (Paragraph 110) requires applications for development to:
- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
 - b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
 - c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
 - d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
 - e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
- 8.172 NPPF Paragraph 111 states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.
- 8.173 NPPF Paragraph 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 8.174 **London Plan Policies 6.1, 6.3, 6.10, 6.11 and 6.13** set out the intention to encourage consideration of transport implications as a fundamental element of sustainable transport, supporting development patterns that reduce the need to travel or that locate development with high trip generation in proximity of public transport services. The policies also provide guidance for the establishment of maximum car parking standards.
- 8.175 **Local Plan Policy T1** sets out the Council's intention to 'work with strategic partners to improve transport provision, accessibility and air quality in the borough, by improving and increasing the opportunities for cycling and walking, and by improving connections for bus services, underground, national and regional rail'. **Local Plan Policy T2** relates to transport assessments and travel plans and states "All development proposals would be assessed for their

contribution to traffic generation and their impact on congestion, particularly on bus routes and on the primary route network”. **Policies T3, T4, T5 and T7** relate to opportunities for cycling and walking, vehicle parking standards, blue badge holders parking and construction and demolition logistics. **Policies 5.16 and 5.17** are relevant to waste and recycling. **Local Plan Policy CC7** sets out the requirements for all new developments to provide suitable facilities for the management of waste.

- 8.176 **Planning SPD (2018) Key Principles WM1, WM2, WM7 and WM11** are also applicable which seek off-street servicing for all new developments.
- 8.177 A Transport Assessment (TA) prepared which accompanies this planning application in accordance with Local Plan Policy T2. A Framework Travel Plan is also submitted with the planning application, which sets out measures to encourage the use of sustainable transport.
- 8.178 The Transport Assessment provides a full review of the impact of the proposals on the local highway and public transport networks. The location of the site in close proximity to a major transport interchange combined with mainline rail services, bus routes, Underground services and the low level of proposed parking means that nearly all of the trips to and from the site will be by sustainable modes of travel.

Trip Generation

- 8.179 The proposed number of residential trips by mode is provided in Table 4 as set out in the Transport Assessment. The Council’s Highways Officer has reviewed the residential trip forecasts (by mode) and considers these to be an accurate reflection of the trip rates for the residential element.

Table 4 Residential trip generation by mode

Mode	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			Daily		
	In	Out	Total	In	Out	Total	In	Out	Total
Car Driver	1	5	5	3	2	5	22	25	47
Car Passenger	0	2	2	1	1	2	8	9	17
Underground	16	91	107	58	34	92	440	483	923
Train	3	14	17	9	5	14	69	75	144
Bus	10	56	66	36	21	57	272	298	570
Taxi	0	1	1	0	0	1	2	3	5
Motorcycle	1	3	4	2	1	3	15	16	31
Cycle	3	16	19	10	6	17	79	87	166
Walk	8	45	52	28	17	45	217	238	454

Total 41 231 272 148 86 234 1,124 1,234 2,358

8.180 The proposed number of office use trips by mode is provided in Table 5. The Council's Highways Officer has reviewed the flexible uses trip forecasts (by mode) and considers these to be an accurate reflection of the trip rates for the residential element.

Table 5 Trip generation by mode for the proposed flexible uses

Mode	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			Daily		
	In	Out	Total	In	Out	Total	In	Out	Total
Car Driver	0	0	0	0	0	0	0	0	0
Car Passenger	0	0	0	0	0	0	0	0	0
Underground	21	1	22	2	18	21	91	89	180
Train	10	0	10	1	8	9	41	40	81
Bus	8	0	9	1	7	8	35	34	70
Taxi	0	0	0	0	0	0	1	1	1
Motorcycle	1	0	1	0	1	1	4	4	8
Cycle	4	0	4	0	3	4	16	15	31
Walk	5	0	5	0	4	5	20	20	40
Total	49	2	51	5	42	47	208	203	411

8.181 The TA demonstrates that there would be an overall reduction in vehicle trip generation (which includes vehicles associated with deliveries, waste collection and taxi drop-off / collections) during the peak periods and across the day. Consequently, the TA concludes that the proposal would have negligible effects in terms of severance and driver delay on local roads. Transport Officers have reviewed the TA and agree with these conclusions.

Public Transport

8.182 The TA also considered the impact on the public transport network and concludes that in terms of rail, the change of use from commercial to residential would result in a slight reduction in overall rail trips. The proposal would result in an overall increase in Underground trips. The greatest peak increase in passengers as a result of the proposed development is shown to be 0.5% on the eastbound services to Shepherd's Bush, which is considered to represent a negligible effect.

8.183 Whilst there would be a net increase in bus trips as a result of the proposed development, the TA demonstrates that these would be distributed further across

the bus network and would have a negligible effect on the bus network overall. TfL do not require any specified s106 contributions towards public transport in terms of increased capacity (for buses, trains or London Underground) and therefore, the impact on public transport overall, is considered to be within acceptable tolerances and can be accommodated within the existing services.

Car Parking

- 8.184 Local Plan Policy T4 states that any proposed development should conform to the maximum parking standards, as set out in Policy 6.13 of the London Plan. Given the site's urban location with excellent public transport accessibility, an entirely car-free scheme is proposed, with the exception of 16 x accessible parking spaces provided within the White City Living basement underneath Phase 2 which is currently under construction. This aligns with the minimum car parking standards set by the London Plan as required for the highly sustainable location of the site.
- 8.185 Local Plan Policy T5 requires that new developments must provide accessible off-street parking for Blue Badge Holders. The minimum blue badge parking provision standards must be compliant with the Mayor of London's blue badge parking standards for off-street car parking (2006).
- 8.186 Draft London Plan policy T6.1 requires that at least one designated disabled persons parking bay per dwelling for three per cent of dwellings is available from the outset. The policy also requires that as part of a Car Parking Design and Management Plan, the applicant should outline the remaining bays to a total of one per dwelling for ten per cent of dwellings can be requested and provided when required as designated disabled persons parking in the future.
- 8.187 In accordance with Draft London Plan policy T6.1, a total of 16 (3%) disabled persons parking spaces will to be provided within the basement of WCL. There will be a pedestrian link provided from this car parking directly into the site with lifts within the building cores to provide step-free access for disabled users from the basement level to the upper levels. Blue Badge Holder residents would also have access to a parking space, subject to availability. The car parking spaces will be made available to Centre House residents (with Blue Badges or for occupiers within the accessible units) within the provisions of the car park management plan, which as this covers both Centre House and WCL developments, it is recommended to secured as a planning obligation within the s106 Agreement.
- 8.188 The applicant has provided further indicative plans of the WCL basement which demonstrates there is sufficient floorspace to create an additional 37 fully accessible car parking spaces, which are planned to be constructed at a later date, in line with further phases of the adjoining development. This parking must be provided to ensure that no double counting between both developments occurs, in respect of the provision of accessible parking spaces if full demand is taken up in both developments. It is considered that as the applicant is capable and promoting both developments, it would be within their control to ensure no double counting occurs. The applicant has provided some detail of how this could work within a technical note, in response to comments made by the Access Forum and LBHF officers. Officers consider that subject to an acceptable

mechanism being secured in the car park management plan, in addition to residents being restricted from obtaining car parking permits (for local CPZs) the car parking levels are appropriate for this development. These will be secured as s106 obligations.

- 8.189 The Transport Assessment concludes that the public transport services are frequent, cover an extensive area and provide access to a wide range of services and amenities. It is considered that there would be no adverse impact on traffic generation and congestion. As such, a predominantly car-free scheme is considered to be acceptable, in accordance with Local Plan Policies T4 and T5.

Cycle Parking

- 8.190 The cycle parking standards outlined in Table 6.3 of the London Plan recommend a minimum of 1 space per one bedroom flat or studio, and 2 spaces for all other dwellings. Policy T5 (Cycling) of the Draft London Plan (2017) increases the minimum standards required for new developments. The draft policy requires 1 space per studio unit, 1.5 spaces per 1-bedroom unit and 2 spaces per all other dwellings.
- 8.191 The Draft London Plan has not yet been adopted. However, the proposal has been designed in line with these new standards. The proposed unit mix results in a requirement for 893 long-stay residential cycle parking spaces and 13 short-stay residential visitor spaces.
- 8.192 The proposed development provides secure, weather proof and accessible long-stay residential cycle parking spaces within the building's basement. The cycle parking provision meets the Draft London Plan standards by providing a total of 915 long stay spaces, and 13 short stay spaces.
- 8.193 The long-stay residential cycle parking will be provided in the proposed development's basement and this will ensure the cycle parking is compliant with the principles required by the London Cycling Design Standards (2016). The parking area will primarily be accessed via an entrance on the south side of the south building, via a cycle lift. The short stay residential visitor parking spaces will be provided, in the form of Sheffield stands, within the public realm in well-lit locations with natural surveillance. TfL has questioned whether the qualitative requirements of the standards are met in addition to acknowledging the quantitative standards are complied with. The applicant has provided a further supporting document which demonstrates that the secure storage racks can be designed to meet a full range of abilities and differing needs within an accessible location in the building.
- 8.194 Whilst flexible uses are proposed within the scheme's commercial units the cycle parking provision for these has been calculated on a 'worst case' basis to ensure that the minimum requirements for each use are met. Accordingly, 22 secure long stay and 45 short stay parking spaces are provided for the commercial uses. The long-stay commercial parking will be provided using cycle racks within the basement. The short-stay commercial parking spaces will be provided, in the

form of Sheffield stands, within the public realm in well-lit locations with good natural surveillance.

- 8.195 In addition to on-site cycle parking the Santander Cycle Hire scheme has recently been extended into LBHF. The nearest cycle docking station to the site is located at Westfield Ariel Way, adjacent to White City bus station, approximately 320m walk south of the site. The docking station has capacity for 42 bicycles. A new docking station has also been secured through s106 obligations for the adjoining WCL site and will provide additional Santander Cycle Hire scheme capacity within the area. No further docking station is required.
- 8.196 TfL has proposed the contributions from the s106 agreement could be used to implement the emerging cycle superhighway within the vicinity of the site. It is understood that this project is still being explored by TfL and LBHF and should the need arise in the future.

Servicing and Waste

- 8.197 Local Plan policy CC7 highlights the importance of sustainable waste management, ensuring that new developments have sustainable waste and recycling store facilities. A Delivery, Servicing and Waste Management Plan support the application. The site will share the WCL basement service area for waste collection and general servicing. It will also use Arrival Square, which is a drop off area for taxis and/or parcel (non-perishable goods) deliveries.
- 8.198 Residential deliveries for the site that consist of perishable goods will be delivered to the WCL basement service area. Non-perishable goods destined for the site will be delivered to the WCL Phase 1 concierge and / or Arrival Square. Taxis will also drop off and pick up in Arrival Square. These facilities are currently under construction. Therefore, there is a high degree of certainty that the provisions would be in place, when the Centre House development is completed (if the scheme is built out in accordance with the ES timeframe).
- 8.199 There are three servicing bays in the WCL basement service yard, capable of accommodating vehicles up to the size of an 8m rigid vehicle (7.5 ton box van), which is typically used for internet/food deliveries at any one time. One of the bays closest to the Phase 1 commercial unit space can also accommodate small articulated vehicle, such as used by supermarket retailers for smaller stores in urban/constrained locations.
- 8.200 Each residential core within the Centre House buildings will have dedicated bin storerooms, located at lower ground floor adjacent to the cores. The site management team will transfer waste from the cores to compactors, located in the WCL service yard. Commercial waste will be temporarily stored in a dedicated commercial bin store within the accommodation and moved by the facilities management team to the WCL service yard, to coincide with scheduled collections.
- 8.201 The WCL basement service area has four portable skip compactors provided for use by the proposed development and the WCL development. These compactors are accessible by a refuse skip lorry (7.10m in length), which would remove/empty/replace the refuse compactors. Swept path analysis for the refuse

skip lorries has been carried out to ensure that the necessary vehicular manoeuvres can be carried out safely.

- 8.202 The Council's Highways officer and Waste Management officer raise no objections to the servicing and waste delivery operations, which are considered to be in accordance with Local Plan Policy CC7.

Construction Impacts

- 8.203 Local Plan policy T7 (Construction and demolition logistics) outlines that all construction, demolition, utilities and major logistic activities within the borough will be required to work with the council in developing the scope and impact of their operations. In order to mitigate the impact of any additional traffic or potential disruption to the network, careful planning and co-ordination with the council is required to ensure the smooth operation of the highway network.
- 8.204 An Outline Construction Logistics Plan has been submitted with the planning application and outlines the proposed measure in order to minimise the impacts of construction on the local highway network and on neighbouring occupiers. This considers the planned redevelopment of the ICL owned Dairy Crest site which may require works to improve and re-plan the Depot Road access. The Construction Logistics Plan considers the highway and pedestrian safety within the existing bridge if it is to remain in situ at the time of the Centre House development work and ICL works. Highways Officers have no raised any objection to the outline CLP although a final detailed CLP would be required at the time, which can be conditioned. Highways Officers have advised that it is important the construction logistics to arise from all developments nearby, are considered comprehensively to avoid congestion and minimise conflicts within the highway from the movement of large vehicles. Subject to the CLP addressing this matter to the satisfaction of the highways authority and TfL, it is considered the construction movements can be accommodated within the highways network.
- 8.205 Conclusions on Transport and Highways: It is considered that the overall traffic impact of the proposed development would be acceptable and in accordance with Local Plan policy T1. The level of car, motorcycle and cycle parking is assessed as being acceptable in accordance with Local Plan policy T3 and the Council's "Planning Guidance" Supplementary Planning Document. The site is highly accessible and well served by public transport. The proposed development would enhance pedestrian and cycle linkages to the development sites to the north and south and to the Wood Lane from the proposed space between the north and south buildings creates an opportunity to establish a new east-west pedestrian/cycle route through the strategic site. Such improvements would the benefit of the wider White City Opportunity/Regeneration Area. It is considered that any impacts arising from the development would be mitigated by conditions and s106 provision to contribute towards sustainable transport infrastructure measures within the White City Opportunity/Regeneration Area and prevent significant increase in on-street parking pressures in surrounding roads.
- 8.206 A car park management, servicing, road safety and travel planning initiatives would be implemented in and around the site to mitigate against potential

adverse impacts. The proposed development is therefore considered acceptable in accordance with policies 6.1, 6.3, 6.9, 6.10, 6.11, 6.13 and Table 6.3 of the London Plan (2016), policies T1, T2, T3, T4 and T7 of the Local Plan and the Council's "Planning Guidance" Supplementary Planning Document and White City Opportunity Area Planning Framework (2013).

Environmental Considerations

8.207 The following environmental impacts have been assessed within the ES and supporting planning application documents.

- Noise and Vibration
- Air Quality
- Water Resources and Flood Risk
- Ecology
- Waste
- Ground Contamination
- Wind Microclimate
- Daylight and Sunlight
- Electronic Interference
- Socio-Economics
- Cumulative and Interactive Effects
- Residual Effects
- Sustainability and Energy
- Archaeology

8.208 The below sections comprise a planning assessment of the development impacts against adopted planning policies, supplementary planning guidance and the National Planning Policy Framework.

Noise and Vibration

8.209 **London Plan Policy 7.15** states that development proposals should seek to reduce noise by minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, a development and promoting new technologies and improved practices to reduce noise.

8.210 **Local Plan Policy CC11** seeks to control the noise and vibration impacts of developments, requiring the location of noise and vibration sensitive development 'in the most appropriate locations'. Design, layout and materials should be used carefully to protect against existing and proposed sources of noise, insulating the building envelope, internal walls floors and ceilings, and protecting external amenity areas. Noise assessments providing details of noise levels on the site are expected 'where necessary'. **Local Plan Policy CC13** seeks to control pollution, including noise, and requires proposed developments to show that there will be 'no undue detriment to the general amenities enjoyed by existing surrounding occupiers of their properties'.

8.211 ES Non-Technical Summary; An assessment on the effects of noise and vibration from the project has been undertaken (Chapter 7, ES Volume I). Mitigation measures to reduce the potential effect of construction noise and ground-borne vibration have been recommended in the ES. Due to the slight change in traffic flows due to construction activities, a negligible significance of

effect has been predicted at all receptors with the exception of NSR 2 which is expected to experience a minor adverse effect post- mitigation during both Phase 1 and 2 demolition and construction.

- 8.212 In terms of the operational development, if noise emissions from fixed mechanical plant and equipment are kept to 10 dB below the background noise level, the long-term effect at existing receptors with high sensitivity levels will be negligible. The ES forecasts that traffic noise generated by the development during operation at the year of opening will have a negligible impact across all receptors.
- 8.213 In considering the effects of noise further, it is noted that the site is adjacent to White City Station where the western boundary of the site is approximately 15m from the nearest rail line. The site is also located in proximity to Wood Lane and Depot Road. The A3220 is also located 300m to the east of the site. Therefore, consideration must be had for the impact of transport noise and vibration on future residents of the proposed development.
- 8.214 In terms of the impact of fixed plant on neighbouring occupiers, LBHF's Planning Guidance SPD (2018) requires that planning applications shall demonstrate that the combined external noise level at maximum capacity, emitted by plant, machinery or equipment, will be at least 10dBA lower than the typically lowest existing representative background. Where noise sources exceed the council's noise limit, details of mitigation measures will be required, such as the installation of silencers, screening, enclosures, anti-vibration isolators, relocation of the offending noise source or replacement with quieter alternatives.
- 8.215 Planning Assessment: The submitted Noise Assessment presents plant noise limits to be met by the proposed development. These outline that emitted noise from plant, received at nearby noise sensitive properties, must be 10 dB below the existing background noise levels. The Assessment identifies existing residential and commercial properties within the local areas as well as future receptors such as the BBC TV Centre properties, WCL and Former Dairy Crest site properties.
- 8.216 The specifications for plant within the proposed development are not currently known. However, the ES advises that noise from fixed mechanical plant and equipment can be mitigated through good mechanical design, choice of location, selection of quieter equipment and installation of acoustic silencers and louvres, which can be conditioned.
- 8.217 Planning policy requires that internal ambient noise levels, for future residents of the proposed development, meet the internal noise maximum LAeq,T during the night-time in bedrooms of 30 dB(A), and 35 dB(A) during the daytime in bedrooms and living rooms.
- 8.218 The Noise Survey shows that, as a result of local background noise sources, noise levels inside the development's habitable residential room could be exceeded without mitigation measures. Noise from external sources can be controlled through the appropriate specification of façade elements that can be conditioned.

- 8.219 Calculations of the acoustic façade glazing requirement have been carried out based on typical sized bedrooms. The Assessment demonstrates that, based on the measured noise levels at site, in conjunction with the proposed glazing and required ventilation, noise levels within the development will be reduced in line with the planning policy requirements to provide good internal ambient noise levels in all habitable rooms across the site, and such provision is secured by conditions, in line with the advice of the Environmental Health Officer.
- 8.220 A vibration survey was carried out around the site to determine the suitability of the area for residential occupation. The measured vibration levels are below or within the range of values which would give rise to a 'low probability of adverse comment' at all locations, meaning that future occupants are unlikely to notice any vibration impacts.
- 8.221 In conclusion, the proposed development would provide an acceptable living environment in terms of ensuring the residential properties are designed to minimise noise from external sources. Subject to conditions recommended by the councils Environmental Health Officers requiring details of sound insulation between residential apartments, noise-sensitive communal areas and between commercial uses, the internal standards of accommodation would be acceptable.

Air Quality

- 8.222 **LBHF** was designated as an Air Quality Management Area (AQMA) in 2000 for two pollutants - Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). The main local sources of these pollutants are road traffic and buildings (gas boiler emissions).
- 8.223 **Paragraph 181** relates to air quality and it states that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
- 8.224 **London Plan Policy 7.14** seeks that development proposals minimise pollutant emissions and promote sustainable design and construction to reduce emissions from the demolition and construction of the buildings; not worsen existing poor-quality air quality. Where additional negative air quality impacts from a new development are identified, mitigation measures will be required to ameliorate these impacts. This approach is consistent with paragraphs 120 and 124 of the NPPF. Further the Mayor of London's Air Quality Strategy provides a framework of policy which aims to improve air quality in London.
- 8.225 **The Mayor's Air Quality Strategy (2010)** seek to minimise the emissions of key pollutants and to reduce concentrations to levels at which no, or minimal, effects on human health are likely to occur.
- 8.226 **Local Plan Policy CC10** seeks to reduce potential adverse air quality impacts arising from new developments and sets out several requirements.

- 8.227 ES Non-Technical Summary: An assessment has been undertaken of the impact that future traffic flows and also on site energy generation equipment will have on local air quality (Chapter 8, ES Volume I). The whole of LBHF has been declared as an Air Quality Management Area (AQMA) due to failure to meet certain air quality objectives. The potential risk for construction activities to impact upon local air quality has been assessed, and mitigation measures have been recommended based on this risk. With implementation of these mitigation measures, the ES considers the impact from construction is considered to be insignificant.
- 8.228 The proposed development will be car free (with the exception of servicing and deliveries plus provision for accessible parking bays). As such it is predicted there will be an overall reduction in total motor vehicle numbers on surrounding roads as a result of the development (compared to the existing site use). It is therefore concluded that the impact from operational traffic emissions associated with the proposed development will be insignificant. Pollutant concentrations have been predicted at residential locations on site and all are predicted to meet relevant air quality objectives.
- 8.229 It is predicted that all receptors will meet relevant air quality objectives, with the maximum impact from energy centre emissions (which includes emissions associated with the proposed Centre House development and WCL development) predicted to be minor adverse at four modeled receptors located within the WCL development. The impact from energy centre emissions at the remaining 39 receptor locations, including all receptors on the proposed Centre House development is predicted to be negligible. It is therefore concluded in the ES that the impact from energy centre emissions will not be significant.
- 8.230 Assessment: The Council's Air Quality Officer has reviewed the AQ Assessment in the ES and requested further evidence to ensure the assessment was fully comprehensive and robust. The ES contained an assessment of the impacts at the worst-case receptors, within the development, and within the adjacent WCL development. The additional data produced confirmed the worst-case receptors had been considered within the ES and it was not considered necessary to require an amendment to the ES Air Quality Chapter. The ES demonstrated that air quality did not deteriorate at the nearest existing residential receptors including those within the Wood Lane Estate properties or the Travelers Site by Westway.
- 8.231 Notwithstanding the findings, it was recognized that the assessment was based on a range of assumptions relating to the emissions from combustion plant (within the energy centre in WCL) and assumptions in terms of emissions from traffic in the area, based on up-to-date forecast data. In light of these assumptions, air quality officers have recommended the imposition of conditions which require details of the Combustion Plant to be in compliance with Emission Standards set by the Local Plan/London Plan, an Air Quality Dust Management Plan and a Low Emissions Strategy. Subject to these conditions, it is considered that adequate mitigation measures could be secured to ensure the development is able to demonstrate compliance with the current London Plan policy 7.14 and Local Plan policy CC10.

Water Resources and Flood Risk

- 8.232 **The NPPF** seeks to meet the challenge of climate change, flooding and coastal change by supporting the transition to a low carbon future in a changing climate taking account of flood risk and coastal change.
- 8.233 **London Plan Policies 5.11, 5.12, 5.13, 5.14 and 5.15** require new development to comply with the flood risk assessment and management requirements of national policy, including the incorporation of sustainable urban drainage systems, and specifies a drainage hierarchy for new development. **Policy 5.3** identifies the efficient use of natural resources (including water) as a principle for informing the achievement of other policies in the London Plan. **Policy 5.11** Part A subsection b recognises the role of green roofs and walls in delivering sustainable urban drainage objectives. **Policy 5.13** further states that development should utilise SuDS unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and manage surface water run-off close to source. **Policy 5.14** states that planning decisions must ensure that adequate waste water infrastructure capacity is available in tandem with development.
- 8.234 **Local Plan Policy CC2** requires major developments to implement sustainable design and construction measures, including making the most efficient use of water.
- 8.235 **Local Plan Policy CC3** requires a site-specific Flood Risk Assessment (FRA) for developments in Flood Zones 2 and 3 that: a. addresses the NPPF requirements; b. takes account of the risk of flooding from all relevant sources; c. integrates appropriate flood proofing measures where there is a risk of flooding; and d. provides structural waterproofing measures in subterranean elements and using non-return valves or equivalent to protect against sewer flooding.
- 8.236 **Local Plan Policy CC4** ('Minimising surface water run-off with sustainable drainage systems') requires all proposals for new development to 'manage surface water run-off as close to its source as possible and on the surface where practicable, in line with the London Plan drainage hierarchy'. It also requires all major developments to implement SuDS 'to enable reduction in peak run-off to greenfield run off rates for storms up to the 1 in 100-year event (plus climate change allowance)' and to provide a sustainable drainage strategy to demonstrate how the strategy will enable these requirements. These are to be retained and maintained for the lifetime of the development, with details of their planned maintenance to be provided.
- 8.237 **Draft London Plan Policy SI13** sets out the same requirement and additionally states that proposals for impermeable paving should be refused and that drainage should be design and implemented to address water efficiency, river quality, biodiversity and recreation.
- 8.238 ES Non-Technical Summary: Demolition and construction activity could potentially cause temporary but significant effects on water quality. Mitigation measures are recommended in Chapter 9 ES Volume I. With the suggested mitigation, the ES considers the impacts to all nearby water bodies that could be affected to be negligible.
- 8.239 The ES considers the impacts on drainage infrastructure during construction to be negligible through the implementation of the outlined mitigation including dewatering and other groundwater control measures (secured by conditions).

- 8.240 Through the diversion of the majority of surface water from combined sewers, the ES considers there will be a reduction in the pressure being placed on the combined sewer, thus reducing flood risk on site and to other receptors downstream. The magnitude of change and residual significant effect to site users has therefore been assessed in the ES as negligible.
- 8.241 Although there will be an increase in water demand and capacity required for foul drainage, the development will need to meet water efficiency standards through a number of measures. The development is looking to meet the 105 l/person/day London Plan requirement through the use of water efficiency measures. This will assist in reducing potable water and foul water demand, through design and construction.
- 8.242 Assessment: Officers, taking advice from the Lead Local Flood Risk Authority advisor and Thames Water, have reviewed the FRA. In broad terms, the FRA is considered to be acceptable as sufficient further information and clarification has been provided in relation to the ground water protection measures to be integrated.
- 8.243 The site is in the Environment Agency's Flood Zone 1 which indicates a low risk to flooding from the River Thames. There is therefore no need to assess or mitigate this source of flood risk.
- 8.244 Surface water flood risk is present on a part of the site, and this has been assessed in the submitted Flood Risk Assessment (FRA). A Surface Water Management Strategy will be implemented on the site which will help manage stormwater run-off from the site. The FRA also confirms that the finished floor levels will help protect site from impacts in the event of a major storm event.
- 8.245 Detailed discussions have taken place with the LLFA and the applicant with regards to the drainage strategy and whether this could (1) include additional forms of sustainable urban drainage (SUDs), (2) confirm the proposed method of discharge to the storm relief sewer and what Thames Water has agreed to, (3) provide further specific detail on the attenuation storage tanks including their location and volume; (4) whether the level of green and brown roofs maximise the area within the roof for this type of drainage; (5) clarify the climate change factor (at 40%) underpin the calculations in the surface water drainage strategy, (6) provide detailed plans of the surface water drainage; (7) confirm the run-off rates at 3 l/s, (8) clarify the foul water discharge rates, (9) provide further details of the operations and maintenance plans of the SUDS and (10) guarantee the incorporation of rainwater harvesting.
- 8.246 In response, further technical clarification has been provided to the satisfaction of Environmental Policy and Planning Officers and the LLFA and as such, conditions are considered appropriate to ensure that the development is carried out in accordance with the detailed surface water strategy, which incorporates SUDS. The drainage condition will be worded to require a detailed Sustainable Urban Drainage System (SUDS), Surface Water Drainage Plan and a Whole Life Management and Maintenance Scheme for these measures is submitted to and approved in writing by the Local Planning Authority. The SUDS scheme shall be designed to include measures prioritized by the London Plan Drainage Hierarchy such as the provision of green, brown and blue roofs, rainwater harvesting

specifications and provisions, attenuation storage tanks with an attenuation minimum volume of 536 sqm and controlled flow rates in accordance with the Flood Risk Assessment by Buro Happold (dated September 2019), the Surface Water Drainage Strategy Note by Buro Happold (dated 19th December) and the SUDS Management and Maintenance scheme (Annex D) dated 20/12/2018.

- 8.247 It is also noted that a basement and lower ground floor are proposed, so there will be a need to include structural water-proofing measures which can be conditioned in accordance with the requirement of Policy CC3.

Ecology

- 8.248 **The NPPF 2019** requires that development should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); minimise impacts on and provide net gains for biodiversity, preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability; and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- 8.249 **London Plan Policy 7.19** requires development proposals to make positive contributions to biodiversity (its protection, enhancement, creation and management) wherever possible and to prioritise improving access to nature in arrears deficient in accessible wildlife sites. **Policy 7.21** of the London Plan supports the retention of existing trees of value and encourages the provision of additional trees, particularly large-canopied species, in new developments.
- 8.250 **Local Plan Policies OS1 and OS5** seeks to enhance biodiversity and green infrastructure in LBHF by (inter alia) maximising the provision of gardens, garden space and soft landscaping, and seeking green and brown roofs and planting as part of new development; seeking retention of existing trees and provision of new trees on development sites; and adding to the greening of streets and the public realm.
- 8.251 **Draft London Plan** sets more ambitious targets for ecology and urban greening, which includes a target to increase tree cover in London by 10% by 2050.
- 8.252 **Draft London Policy G5** states that major development proposals should 'contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage'. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments, based on Urban Greening Factors set out in Table 8.2 of the draft Local Plan. Higher standards of greening are expected of predominately residential developments (target score 0.4).
- 8.253 **Draft London Policy G7** states that existing trees of quality should be retained wherever possible or replace where necessary. New trees are generally expected in new development, particularly large-canopied species.

- 8.254 **Non-Technical Summary:** An assessment of the potential impacts to local ecology as a result of the proposed development has been undertaken (Chapter 10, ES Volume I). Very few ecological constraints are associated with the site itself with no habitats of conservation importance or protected/notable fauna or plant species identified during the survey. The habitats present on site include buildings, hard standing, planted trees and shrubs; all of which are common and widespread. Suitable habitat for nesting birds is present in the form of small trees and shrubs with a small stand of non-native invasive Japanese knotweed identified adjacent to the western boundary.
- 8.255 Although no direct impacts on the adjacent Central Line West of White City Site of Interest for Nature Conservation (SINC) are anticipated during demolition or construction, implementation of supplementary mitigation measures detailed in the CEMP to manage airborne dust, waste, noise/vibration and construction lighting will ensure that these elements do not cause a significant effect to this ecological feature.
- 8.256 The CEMP will also detail control measures to avoid potential impacts on nesting birds during building demolition and vegetation removal and prevent the spread of the non-native invasive Japanese knotweed.
- 8.257 Upon completion of the development, the site will incorporate new buildings and hard-standing as well as green infrastructure including ground level soft landscaping and a roof garden at level 11. Generalist bird species and invertebrates will benefit from the soft landscaping which will include trees, shrubs and climbers, while drystone planters and walls will offer invertebrate habitat which will create a minor beneficial effect for local biodiversity.
- 8.258 With implementation of the proposed supplementary mitigation, no effects are considered likely to be significant during demolition/construction or operation. A number of supplementary measures have been recommended in the ES to enhance the site for biodiversity in line with planning policy objectives, which will have minor beneficial effects for biodiversity.
- 8.259 **Planning Assessment:** Officers have reviewed the ES and are in agreement with the conclusions relating to ecological impact. The combination of proposed landscaping works within the public realm and roof garden provision of green and brown roofs, and tree replanting would ensure that the proposed development would deliver biodiversity gains, above the current baseline condition of the site in accordance with Local Plan policies OS1 and OS5, London Plan policies 7.19 and 7.21 and the NPPF (2019).

Waste

- 8.260 **London Plan Policies 5.16 and 5.18** seeks to achieve waste net self-sufficiency. It seeks to (inter alia) minimise waste, encourage the reuse and reduction in use of materials, increase recycling and composting levels in local authorities and in construction, excavation and demolition, reduce the proportion of waste exported from London and wherever practicable waste should be removed from and brought to sites by water or rail transport.
- 8.261 **Local Plan Policies CC6 and CC7** sets out the Council's intention to pursue the sustainable management of waste and requires all new developments to 'include suitable facilities for the management of waste generated by the development,

including the collection and storage of separated waste and where feasible on-site energy recovery’.

- 8.262 ES Non-Technical Summary: An assessment has been made of the effects of solid waste generation and management during demolition, construction and operation of the proposed development (Chapter 11, ES Volume I). After mitigation measures have been implemented, it has been estimated that the demolition and construction works related to the proposed development will result in an effect significance of negligible.
- 8.263 An Operational Waste Management Plan (OWMP) has been developed for the proposed development. It has been estimated that around 374 tons of residual waste and 250 tons of recyclable waste will be generated per year from residential activities. Additionally, it has been estimated that around 104 tons of commercial residual waste, 104 tons of commercial recyclable waste will be generated per year once the proposed development is in full operation. These make up a total of 478 tons of residual MSW and 353 tons of recyclable MSW per year. Predictions by WRWA show that LBHF have a surplus waste management capacity of approximately 443,100 tons per year in 2026, and in the WAWA area as a whole, a surplus capacity of approximately 16,900 tons per year in 2026. As such, it has been estimated that an effect significance of negligible deriving from residual waste and recyclable waste will result.
- 8.264 Planning Assessment: The ES reports that the residual effects will not be significant. During the demolition and construction period, in order to ensure that pressure on local waste infrastructure is minimised and effects reduced, mitigation measures in the form of a SWMP will be employed which will be conditioned. The Council’s Waste and Recycling Team have reviewed the proposals and raise no objections, and confirm that the details as submitted are acceptable. It is considered that the proposals are capable of providing for the sustainable management of waste in accordance with Local Plan policies CC6 and CC7 and London Plan policies 5.16 and 5.18.

Ground Contamination

- 8.265 **London Plan Policy 5.21** explains that ‘the Mayor supports the remediation of contaminated sites and will work with strategic partners to ensure that the development of brownfield land does not result in significant harm to human health or the environment, and to bring contaminated land to beneficial use’. For decision-making, the policy requires ‘appropriate measures’ to be taken to ensure that development on previously contaminated land does not activate or spread contamination.
- 8.266 **Local Plan Policy CC9** requires a site assessment and a report on its findings for developments on or near sites known to be (or where there is reason to believe they may be) contaminated. Development will be refused ‘unless practicable and effective measures are to be taken to treat, contain or control any contamination’. Any permission will require that any agreed measures with the council to assess and abate risks to human health or the wider environment are carried out as the first step of the development.
- 8.267 **Key principles LC1-6 of the Planning Guidance SPG** identify the key principles informing the processes for engaging with the council on, and assessing, phasing and granting applications for planning permission on contaminated land. The latter principle provides that planning conditions can be

used to ensure that development does not commence until conditions have been discharged.

- 8.268 ES Non-Technical Summary: A study assessing the potential for exposure to contaminated land as a result of the proposed development coming forward has been undertaken (Chapter 12, ES Volume I).
- 8.269 During the below ground works of construction, the ES confirms that there are also potential risks associated with the possible presence of unexploded ordnance (UXO). These potential ground related risks have been assessed as moderate to minor adverse significance. The ES advises that the potential risks are capable of mitigation by the implementation of an appropriate programme of investigation and by the subsequent design and implementation of a Remediation Strategy.
- 8.270 During the operational phase, the ES confirms that any contamination in the Made Ground or shallow aquifer will have been excavated, treated, capped, or removed during the construction of the development. According to the ES, all the potential risks associated with the ground conditions will be mitigated during the construction phase by the implementation of the approved Remediation Strategy. The evidence for the successful completion of these works will be presented in a Verification or Completion Report.
- 8.271 Planning Assessment: Chapter 12 Ground Conditions of the submitted Environmental Statement has been reviewed by the Council's Contaminated Land Officer who advises that the ES correctly presents the likely risks of the final development prior to undertaking ground investigations to a greater extent than would be normally recommended. In light of the findings, it is recommended that 6 conditions are required to ensure that the development would not result in unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with policies CC9 and CC13 of the Development Management Local Plan. These conditions would include the requirement to secure approval for a preliminary risk assessment, a site investigation, a remediation method abatement, and qualitative risk assessment based on the remediation strategy, a verification report and an on-going long-term monitoring report.

Wind Microclimate

- 8.272 **London Plan Policy 7.6** states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to (inter alia) wind and microclimate. **London Plan Policy 7.7** states that tall buildings should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing.
- 8.273 **The Mayor's Sustainable Design and Construction SPG** recognises at paragraph 2.3.7 that large buildings can alter their local environments and affect the micro-climate and notes that the Lawson Comfort Criteria can be used to assess the impact of a large building on the comfort of the street environment. It further states that developers should assess the potential impacts at ground level of any building that is significantly taller than its surroundings.

- 8.274 **Local Plan Policy DC3** states that tall buildings should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing.
- 8.275 **Local Plan Policy CC2** seeks to ensure that developments are comfortable and secure for users and avoid impacts from natural hazards. In supporting text paragraph 13.7 explains that this policy is intended to ensure that developments help to enhance open spaces and contribute to well-being.
- 8.276 **Draft London Plan** further addresses wind and microclimate. Indirectly, draft Policy GG1 requires streets and public spaces to be planned for circulation by the comfort in comfort and safety, and to be welcoming. More directly, draft Policy D8 addresses the environmental impact of tall buildings, requiring careful consideration of the wind (and daylight, sunlight penetration and temperature) conditions around tall buildings and their neighbourhoods so that they do not compromise the comfort and enjoyment of them. Draft paragraph 3.1.2 further states the importance of a comfortable pedestrian environment with regard to levels of sunlight, shade, wind, and shelter from precipitation.
- 8.277 ES Non-Technical Summary: The study (in Chapter 13, ES Volume I) combines measured pedestrian level wind speeds at key areas in and around the site with long-term wind frequency statistics to determine the probability of local wind speeds exceeding comfort and safety thresholds for a range of common pedestrian activities based on the industry standard Lawson criteria. This defines the type of activities for which the wind conditions would be safe and comfortable.
- 8.278 Whilst the ES anticipates that the wind conditions during the construction and demolition process are expected to deteriorate, the perception of those crossing the site during the demolition and construction phase is likely to be as much affected by expectations of conditions around a building site as by the actual wind speeds. Consequently, no mitigation measures were identified for demolition and construction as they are not expected to be the driving considerations during those phases.
- 8.279 Wind conditions in and around the proposed development site within the context of both existing and future surrounds are rated (in the ES) as suitable, in terms of pedestrian safety for use by the general public.
- 8.280 In terms of pedestrian comfort, the ES predicts that the wind conditions within the context of the existing surrounds would be generally suitable, for their intended use. However, exceptions to this occur at a ground level entrance located along the south-facing façade of North Block Tower, at an outdoor seating area located within the southern region of the terrace of South Block Tower and at a number of upper level balconies in both North and South Block Towers.
- 8.281 For all the adverse effects of the proposed development, the introduction of the soft landscaping proposals and mitigation – whose performance is expected to be verified via wind tunnel testing as a condition of planning consent – conditions would be required to improve, to the extent that they become suitable for planned uses. The ES predicts a residual effect, subject to condition, which would be negligible.
- 8.282 Assessment: It is considered that the Microclimate Mitigation Scheme should be

secured as a condition to ensure mitigation measures are designed to provide an appropriate wind environment throughout and surrounding the development in accordance with policies 7.6 and 7.7 of the London Plan (2016) and Local Plan Policies DC3 and CC2.

Daylight and Sunlight

- 8.283 **London Plan Policy 7.6** requires new buildings and structures to ensure that they do not cause unacceptable harm to the amenity of surrounding land and buildings in relation to a number of factors, including overshadowing. Policy 7.7 further states that tall buildings should not adversely affect their surroundings in terms of overshadowing and reflected glare.
- 8.284 **The Mayor's Housing SPG Policy 7.6** makes clear that 'an appropriate degree of flexibility' should be applied when assessing the impacts of new development on surrounding properties and within developments. Paragraph 1.3.45 states 'Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.' Paragraph 1.3.46 further states 'The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.'
- 8.285 **Local Plan Policy HO11** addresses detailed residential standards and, in seeking a high standard of design, seeks to ensure the protection of existing residential amenities; 'including issues such as loss of daylight, sunlight, privacy and outlook'. **Local Plan Policies DC2** and **Policy DC3** states that all new builds and tall buildings must be designed to respect good neighbourliness and the principles of residential amenity.
- 8.286 **SPD Key Principle HS1** states that, "Where communal open space is provided, development proposals should demonstrate that the space: is designed to take advantage of direct sunlight..." And, **SPD Key Principle SDC1** states that, "Other effects buildings can have on the local climate include: Overshadowing and reducing access to sunlight"
- 8.287 **The BRE Guidelines** are typically used to assess daylight and sunlight. The Guideline sets out three methods for assessing daylight into a room including the Vertical Sky Component (VSC) method; plotting of the no-sky line method and the Average Daylight Factor (ADF) method. The introduction to the guide however stresses that it should not be used as an instrument of planning policy and should be interpreted flexibly because lighting is only one design factor for any scheme. Sunlight assessment is based on annual probable sunlight hours (APSH) and winter sunlight hours. In terms of overshadowing of gardens and open spaces the BRE guide recommends that for an open space to appear adequately sunlit through the year, more than half of the space should receive at least two hours of sunlight at the March equinox.

- 8.288 Non-Technical Summary: An assessment has been made of the likely environmental effects of the proposed development with respect to daylight and sunlight and overshadowing, on the existing and future surrounding buildings (Chapter 14, ES Volume I). The assessment has been undertaken in accordance with the relevant local policies and industry best practice guidance to assess the significance of the proposed development in terms of daylight, sunlight, overshadowing and solar glare.
- 8.289 During demolition of the current buildings, there is likely to a progressive reduction in the bulk and massing on the site. The extent of the changes to daylight, sunlight and overshadowing during demolition is likely to be beneficial to the sensitive receptors in the short term. The ES predicts that the sensitive receptors will temporarily enjoy gradually decreasing daylight and sunlight levels until the new buildings are completed and occupied. Overall the effects of the proposed development during construction will be negligible.
- 8.290 The effects of the proposed scheme in isolation on the daylight, sunlight and overshadowing on the existing neighbouring receptors have been considered in the ES and overall will be of negligible significance, which will be permanent (long term) and at a local scale.
- 8.291 The ES predicts that the daylight and sunlight and overshadowing effects to the future receptors at WCL Phases 1 and 2 overall will be moderate adverse, which will be permanent (long term) and at a local scale.
- 8.292 The daylight and sunlight effects to the future receptors at the Former Dairy Crest site will overall be minor adverse, which will be permanent (long term) and at a local scale. It should be noted that the emerging plans for the site identifies residential uses towards the centre of this site unlike the consented development. As such, daylight and sunlight impacts may improve subject to the disposition of land uses within the site to the north.
- 8.293 The daylight and sunlight effects on the future sensitive receptors as a result of the proposed development once completed and occupied in future Scenarios has been considered and will result in moderate adverse effects, which will be permanent (long term) and at a local scale.
- 8.294 Planning Assessment: The residual effects of the proposed development are considered acceptable given the location of the site within an urban inner-city environment, designated for high-rise residential development, where rigid application of the BRE guidelines would be inappropriate. A more flexible approach is required when determining the overall effects of proposed development on the level of daylight, sunlight and overshadowing to current and future sensitive receptors.
- 8.295 Assessment: Paragraphs 8.105 to 8.159 include a detailed planning assessment of the sunlight and daylight impacts including a policy assessment with regard to the amenity considerations.

Electronic Interference

- 8.296 The potential impacts of the proposed development upon telecommunication networks have been assessed (Chapter 15, ES Volume I). The use of tower

cranes during the demolition and construction phase has the potential to disrupt satellite and terrestrial television reception in small and isolated areas to the immediate north-west of the site. Mitigation of this impact comprises repositioning antennas and satellite dishes which is likely to restore all reception, leaving no residual effects. The construction phase is likely to alter local coverage of the TETRA radio network. Whilst it is not possible to predict how coverage will change, should any adverse impact be identified, alterations to the TETRA network would bolster coverage, restoring optimal reception conditions.

- 8.297 It can be concluded that the proposed development may adversely impact the reception of digital satellite and television services for small number of users located on Wood Lane, adjacent to the site, and may cause degradation to TETRA coverage. However, the ES recommends simple mitigation (antenna relocation and network enhancement respectively) that is anticipated to restore the reception of all services leaving no long-term residual effects for any television or radio user. The mitigation could be secured by way of a planning condition.

Socio-Economics

- 8.298 **London Plan Policy 3.1** presents the Mayor's commitment to ensuring equal life chances for all Londoners, borne out of the recognition that meeting the needs of particular groups and communities is key to addressing inequalities and fostering diverse communities. **Policies 3.3, 3.8 and 3.11** relate to increasing housing supply, ensuring housing choice and reaching affordable housing targets. **Policy 3.6** state that all children and young people have safe access to good quality, well-designed, secure and stimulating play and informal recreation facilities. **Policy 3.16** sets out that London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population. **Policy 3.17** states the Mayor will support the provision of high quality health and social care appropriate for a growing and changing population, particularly in areas of under-provision or where there are particular needs. **Policy 4.12** seeks to improve access to employment and employment opportunities for Londoners, supporting local employment, development and training.
- 8.299 **Local Plan Policies E1 and E2** relate to employment uses. The Local plan states that plans for the WCRA should
- 8.300 **Draft London Plan** provides revised housing targets for LBHF. For the period 2019/20 to 2028/29 the Draft London Plan sets out a target for 16,480 new homes to be delivered, an annual average of 1,648.
- 8.301 ES Non-Technical Summary: A socio-economic impact assessment has been undertaken using a wide range of information sources, including Census data and studies/assessments relating to businesses, housing, travel and commuting patterns, education and health care (Chapter 16, ES Volume I). The proposed development has been assessed with regards to its potential population generation and the impacts this new population could have on the local economy and social infrastructure assets. Non- residential components of the scheme have been assessed with regards to potential employment generation and the impact this could have on the local labour market
- 8.302 During the demolition and construction phase the proposed development will

generate beneficial employment effects. Although temporary in nature, this employment will boost the local economy and could provide training and job opportunities for local residents with the construction and associated industries.

- 8.303 In respect of the completed development, the ES considers that it would have an overall positive effect on the LBHF and Greater London economies. Employment benefits would be generated during the operational phase through the job opportunities created by the new commercial and retail uses on-site. It is identified that the provision of new residential units would also increase local spending within the LBHF and Greater London economies.
- 8.304 The proposed development will deliver additional residential units of various sizes and tenures including affordable key worker housing units. This provision will help to meet an identified demand for new housing and affordable housing within LBHF and Greater London. The assessment concludes that in the long term there will be negligible effects on education infrastructure and a beneficial effect on the provision of open space within the local area. It is concluded however that there is likely to be a minor adverse effect on the provision of primary health care facilities locally, given assessments of existing capacity and anticipated levels of demand arising from new residential populations.
- 8.305 The ES recommends that a planning obligation be used to collect funds towards local health care provision, which has been factored in in reaching these conclusions.
- 8.306 Planning Assessment: It is considered that the proposals would provide economic and social benefits as a result of the additional employment created from the construction processes and on-going operational jobs, that partially offset the loss of B1 employment generating floorspace. In light of the tenure of the affordable key worker units, which would be managed by Imperial College London, the development would facilitate the retention of London-based staff at the ICL White City campus which would deliver some indirect economic benefit as a result of the nature of the research, technology and medical sciences developed at the University. The proposals are on balance, considered to be in accordance with policies E1 and E2 of the Local Plan (2018) with regards to employment provision, and WCRA and WCRA1 with regards to the wider benefit to the regeneration area due to the support given to economic growth (increased expenditure and ICL activities/projects).

- *Cumulative and Interactive Effects*

- 8.307 An assessment has been undertaken of the potential for interactive cumulative effects to arise (Chapter 17, ES Volume I) that is, whether individual receptors could be subject to the interaction of more than one effect simultaneously, leading to more significant effects on those individual receptors.
- 8.308 The ES confirms that future occupants of the WCL and the Former Dairy Crest sites may be subject to short term minor to major interactive effects resulting from both construction noise (including from construction vehicles) and vibration, air quality and also townscape visual impacts during the construction phase, as is the case in all construction projects. The ES confirms that the significance of the individual effects of noise and vibration, air quality and visual impact do not worsen interactively. These have been shown to have minor to major short term adverse

effects depending upon factors such as time of day, construction stage and proximity of construction equipment to individuals within these receptor buildings. The ES considers that the effects are in the most part reversible and short term.

8.309 It is noted that other nearby close residential and business/commercial receptors have the potential to be exposed to temporary minor adverse effects on air quality as a result of dust during the construction phase and also to townscape and visual impacts of varying degrees from the construction phase to operational phase. The ES considers that the interactive effect, of all effects together, will be minor to major adverse at worst, and also temporary/short term in nature.

8.310 During the operational phase there are not expected to be any significant adverse interactive cumulative effects on these close distance receptors (including the future WCL and Former Dairy Crest site developments) (and rather, only townscape/visual effects which range from minor neutral to major beneficial and moderate reduction in daylight sunlight/overshadowing of amenity areas).

8.311 In townscape and visual impact terms, a neutral effect has been predicted at views 1, 5, 7 and 8 at Kensal Green Cemetery, Oxford Gardens Conservation Area, Darfield Way, and Avondale Park Gardens respectively. This contrasts with the eight moderate and major beneficial effects predicted to other views, in addition to other significant beneficial effects to certain character and conservation areas.

- *Residual Effects*

8.312 The following effects are predicted in the ES to be significant (that is, more than negligible or minor). Some of these effects are beneficial while others are adverse. Note that these effect significances are after mitigation has been implemented.

Table 6. Residual Effects

Topic	Receptor	Effect	Residual Significance
Demolition and Construction			
Townscape, Heritage and Visual Impact	Close distance receptors TCA 1 and the Wood Lane Conservation Area	Townscape and visual effects during construction	Minor to Major Adverse
Operation			
Daylight/Sunlight	White City Living (Phases 1 and 2)	Reduction in daylight/sunlight levels and overshadowing	Moderate Adverse
Townscape, Heritage and Visual Impact	Townscape Character Area TCA 1	Improved townscape and visual effect due to well composed and high quality new buildings	Major Beneficial,

Townscape, Heritage and Visual Impact	Views 12 (Wood Lane Public Highway), 13 (BBC Television Centre Forecourt), 14 (Wood Lane at entrance of White City Living development), 15 (Wood Lane at South Africa Rd) and 16 (White City Employment Area)	Improved townscape and visual effect due to well composed and high quality new buildings	Major Beneficial
Townscape, Heritage and Visual Impact	Wood Lane Conservation Area	Improved townscape and visual effect due to well composed and high quality new buildings	Major Beneficial
Townscape, Heritage and Visual Impact	Views 2 (North Open space Little Wormwood Scrubs), 3 (North western open space – Wormwood Scrubs Park) and 4 (North eastern space – Kensington Memorial Park)	Improved townscape and visual effect due to well composed and high quality new buildings	Moderate Beneficial
Townscape, Heritage and Visual Impact	Views 1 (Kensal Green Cemetery), 5 (Kelfield Gardens – Oxford Gardens Conservation Area), 7 (Darfield Way) and 8 (Avondale Park Gardens Conservation Area)	Improved townscape and visual effect due to well composed and high quality new buildings	Moderate neutral
Water Resources and Flood Risk	Water Services Infrastructure	Reduction in amount of surface water drainage being discharged into surface water network and improvement to Flood Risk	Moderate Beneficial
Cumulative Effects			

Cumulative Effects-Interactive Effects	White City Living	Interaction effect (from construction noise and vibration, townscape and visual impact and air quality)	Short-term Minor-Major Adverse (during construction – moderate overall)
Cumulative Effects-Interactive Effects	Former Dairy Crest Site (now ICL)	Interaction effect (from construction noise and vibration, townscape and visual impact and air quality)	Short-term Minor-Major Adverse (during construction – moderate overall)
Cumulative Effects-Interactive Effects	Close Distance receptors	Interaction effect (from construction noise and vibration, townscape and visual impact and air quality)	Short-term Minor-Major Adverse (during construction – moderate overall)
Cumulative Effects – in Combination Effects	Viewpoints 1 (Kensal Green Cemetery), 5 (Oxford Gardens CA), 7 (Darfield Way) and 8 (Avondale Park Gardens)	Townscape Views	Moderate neutral effect

Sustainability and Energy

- 8.313 **The NPPF (2018)** requires new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change and to help to reduce greenhouse gas emissions, such as through its location, orientation and design. The NPPF in paragraph 152 expects new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption. When determining planning applications for renewable and low carbon development, the NPPF advises that local planning authorities should approve applications if the impacts are (or can be made) acceptable.
- 8.314 **London Plan Policies 5.1, 5.2 and 5.3** require developments to make the fullest contribution to the mitigation of and adaptation to climate change, ensure sustainable design and construction and minimise carbon dioxide emissions. Policies 5.5, 5.6, 5.7 and 5.8 require developments to provide decentralised energy, renewable energy and innovative energy technologies where appropriate.
- 8.315 **The Mayor’s Sustainable Design and Construction SPG** provides guidance on the implementation of London Plan Policy 5.3 and provides a range of additional guidance on matters relating to environmental sustainability.

- 8.316 **Draft London Plan Policy SI2** seeks to extend the extant requirement on residential development to non-residential development to meet zero carbon targets. It maintains the expectation that a minimum reduction of 35% beyond Building Regulations to be met on site (10% or 15% of which should be achieved through energy efficiency for residential development, and non-residential development). Where it is clearly demonstrated that the zero-carbon target cannot be met on site, the shortfall should be provided through a cash in lieu contribution to the borough's carbon offset fund, or off-site provided an alternative proposal has been identified and delivery is certain.
- 8.317 **Draft London Plan Policy SI3** identifies Heat Network Priority Areas. Supporting text explains that further information about the relevance of CHP in developments of various scales will also be provided in an Energy Planning Guidance document, which will be kept updated as technology changes, however this guidance has not yet been published. The draft Plan states that it is not expected that gas engine CHP will be able to meet the standards required within areas exceeding air quality limits with the technology that is currently available.
- 8.318 **Draft London Plan Policy SI4** seeks to minimise internal heat gain and the impacts of urban heat island effect through design, layout, orientation and materials. An energy strategy should demonstrate how development proposals will reduce potential for overheating and reliance on air conditioning systems in accordance with a hierarchy that prioritises the minimisation of internal heat generation through energy efficient design and reductions to the amount of heat entering a building.
- 8.319 **Local Plan Policy CC1** requires major developments to implement energy conservation measures by implementing the London Plan sustainable energy policies and meeting associated CO₂ reduction target and demonstrating that a series of measures have been taken to reduce the expected energy demand and CO₂ emissions. It requires the use of on-site energy generation to further reduce CO₂ emissions where feasible.
- 8.320 **Local Plan Policy CC2** seeks to ensure the implementation of sustainable design and construction measures by implementing the London Plan sustainable design and construction policies.
- 8.321 **London Plan policy 5.2** requires major development proposals to include a detailed energy assessment to demonstrate that the targets for carbon dioxide emissions are met. The London Plan energy hierarchy set out within the policy is:
1. Be lean: Use less energy
 2. Be clean: Supply energy efficiently
 3. Be green: Use renewable energy
- 8.322 In line with Policy 5.2, the revised GLA's energy assessment guidance explains that the carbon reduction target for new development changed in October 2016 as follows:
- 8.323 Zero carbon homes (as defined in section 5.2 of the Housing SPG) are expected for residential developments. This means that residential areas should achieve at least 35% reduction in regulated carbon emissions over Part L 2013 and the

remaining regulated CO2 emissions to achieve 100% saving are to be offset through a cash in lieu contribution to the relevant borough. For commercial/non-domestic development Carbon emissions should aim to be 35% below Part L 2013.

- 8.324 The desire to reduce energy demand and carbon emissions has been considered in the design and measures have been incorporated into the buildings' design to limit the buildings' energy consumption.
- 8.325 An Energy Statement that highlights a range of advanced Be Lean energy efficiency measures accompanies the planning application. They enable the proposed development to meet Part L1A 2013 Target Emission Rate (TER) and Target Fabric Energy Efficiency (TFEE) minimum standards for the residential aspect of the development through energy efficiency measures alone.
- 8.326 In line with the London Plan, the feasibility of decentralised energy production as a Be Clean measure has been examined, and the consideration is set out in the Energy Statement. The application of low carbon energy supply and generation through the use of an on-site Combined Heat and Power (CHP) achieves a regulated CO2 emission reduction of 36% over Be Lean emissions.
- 8.327 Since there is relatively limited roofspace available for solar photo-voltaics, the scheme will offset the remainder of its regulated CO2 emissions through a carbon offset payment (of £657,000), to be secured through the s106 agreement. There are 337 tonnes of residual CO2 associated with the residential aspect of the development. The residual CO2 is therefore proposed to be met through a carbon offset payment to be paid to the LBHF carbon offsetting fund. The Council's Environmental Policy Officer has reviewed the energy statement and raises no objections to the proposed energy strategy subject to conditions securing (a minimum) 35% CO2 emissions.
- 8.328 A full BREEAM Pre-Assessment is provided with the planning application and provides an illustrative route to achieve the 'Very Good' rating for the proposed ground floor commercial units. A post completion condition is recommended to ensure the development complies with the relevant rating for the proposed commercial units.
- 8.329 A Dynamic Overheating Report has also submitted with the planning application. The report considers the overheating risk for dwellings within the proposed development and uses analysis which is considered to be in line with the GLA's guidance on preparing energy assessments (March 2016) and the London Plan's Policy 5.9 cooling hierarchy.
- 8.330 The Overheating Report sets out that, following the cooling hierarchy, a number of passive mitigation measures have been applied to the design. These include reduced glazing areas to limit solar gains whilst maintaining good daylight level, external shading through balconies and overhangs and high reflectance blinds to operate during the day where necessary.

- 8.331 Based on these key design features and mitigation measures, all residential units and communal corridors tested are able to achieve thermal comfort targets for future residents, according to the report.
- 8.332 Conclusions on Sustainability/Energy: The submitted planning documents demonstrates to the satisfaction of officers that the proposed development can be designed to meet a high standard of sustainable construction subject to conditions. The proposed energy strategy includes a connection to the provision for a decentralised energy centre within phase 1 of the White City Living development, which incrementally becomes active as both developments are constructed. The proposed energy centre (within the adjoining development site) would provide the heating and hot water requirements for the development through Gas fired CHP units.
- 8.333 The development will contribute towards further CO2 reductions through façade design and the incorporation of green and brown roofs to supplement the provision of gas fired CHP units as appropriate to their carbon reduction target and energy profile, in addition to the Carbon off-setting contribution. This will result in a significant reduction of CO2 emissions beyond the Building Regulations 2010 compliant level. Subject to conditions, and s106 off-setting contribution which would enable compliance with the London Plan targets, the proposed development is therefore considered to be acceptable and would be in accordance with policies 5.1, 5.2, 5.3, 5.6, 5.7, 5.8, 5.9, 5.11, 5.12, 5.13, 5.14, 5.15, and 7.19 of the London Plan (2016), and would broadly comply with the intent of policies CC1, CC2, CC3, CC4, CC6, CC9 and CC10 of the Local Plan and the Council's Planning Guidance Supplementary Planning Document and White City Opportunity Area Planning Framework (2013).

Archaeology

- 8.334 **Local Plan Policy 7.8** states that new development should make provision for the protection of archaeological resources. It recognises the significance of London's heritage assets and historic environment and states the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping. Part E states that new developments should 'incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology' and notes that 'where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset'. Paragraph 7.31 notes that 'substantial harm to or loss of a designated heritage asset should be exceptional... Where a development proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal'. Paragraph 7.32 recognises the value of London's heritage, stating that 'where new development uncovers an archaeological site or memorial, these should be preserved and managed on-site. Where this is not possible provision should be made for the investigation, understanding, dissemination and archiving of that asset'.
- 8.335 **Local Plan Policy DC1** states the following: 'The existing character of the borough is heavily influenced by a variety of historical, landscape and architectural assets. Some of these are of national importance, such as listed buildings and the Fulham Palace Moated Site, whereas others are of borough importance, including archaeological priority areas... and locally listed buildings of merit. However,

whether they are of national or local importance, they should be considered in all developments in accordance with the policies of the National Planning Policy Framework (NPPF) and the associated Historic England Historic Environment Planning Practice Guide’.

- 8.336 **Local Plan Policy DC8** states that the council will conserve the historic environment by protecting, restoring and enhancing its heritage assets and sets criteria for planning applications. Supporting paragraph 5.2.3 states that where the preservation of remains in situ is not possible or is not merited, ‘planning permission may be subject to conditions and/or formal agreement requiring the developer to secure investigation and recording of the remains and publication of the results’.
- 8.337 A desk-based assessment was carried out as part of the EIA Scoping process. A report dated March 2017 was submitted to LBHF, setting out the authors’ view that the site has low archaeological potential and that due to past activity at the site it was not considered necessary to prepare an EIA chapter on the potential for significant impacts on archaeology. There were no designated assets recorded on or in close proximity to the site and is it not within an Archaeological Priority Area. In addition, past uses of the site for activities such as brick-earth extraction and subsequent industrial and commercial uses have had a negative impact on the archaeological potential of the site. As such the author considered there was no potential for significant adverse effects on archaeology as a result of the proposed development and that it therefore did not need to be included in the EIA process.
- 8.338 Historic England has subsequently confirmed that no conditions or further investigation are necessary.

Community Infrastructure Levy (CIL) / Planning Obligations

- 8.339 This development would be subject to a London-wide community infrastructure levy (Mayoral CIL2). MCIL2 will also be chargeable at a rate of £80/sqm for new development except for health and education. Relief is available on residential floorspace for social housing. The GLA expect the Council, as the collecting authority, to secure the levy in accordance with Policy 8.3 of The London Plan.
- 8.340 The Proposed Development would not be liable for Borough CIL (BCIL). The LBHF CIL Charging Schedule identifies a nil rate within the White City Regeneration Area.
- 8.341 The Community Infrastructure Levy Regulations state that planning obligations may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.
- 8.342 **The NPPF (2019)** provides guidance for local planning authorities in considering the use of planning obligations. It states that ‘authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations and that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition’.

- 8.343 **London Plan Policy 8.2** states that: ‘When considering planning applications of strategic importance, the Mayor will take into account, among other issues including economic viability of each development concerned, the existence and content of planning obligations. Development proposals should address strategic as well as local priorities in planning obligations. Affordable housing and other public transport improvements should be given the highest importance’. It goes on to state: ‘Importance should also be given to tackling climate change, learning and skills, health facilities and services, childcare provisions and the provision of small shops.’
- 8.344 **Local Plan Policy INFRA1** (Planning Contributions and Infrastructure Planning) states: ‘The Council will seek planning contributions to ensure the necessary infrastructure to support the Local Plan is delivered using two main mechanisms: ‘Community Infrastructure Levy. The Council will charge CIL on developments in accordance with the CIL Regulations (as amended) and the LBHF CIL Charging Schedule. The Council will spend CIL on:
- 8.345 The Council will seek to negotiate S106s, where the S106 ‘tests’ are met, for:
- the provision of infrastructure projects or types not specified on the R123 List (through either financial contributions or ‘in kind’ delivery); and
 - ‘non-infrastructure’ provisions, such as for affordable housing (see policy H03) and S106 monitoring expenses.’
- 8.346 The LBHF CIL Charging Schedule identifies a number of exceptions to the R123 List where the Council intends to negotiate S106 obligations to secure the provision of infrastructure. Two of the identified exceptions are:
- 8.347 Provision of infrastructure which is required to ensure compliance by a development with a policy of the Development Plan and any relevant SPDs which specifically requires provision on the relevant site: and
- 8.348 An item of infrastructure or the improvement, replacement, operation or maintenance of any infrastructure) that is specifically required to make a planning application acceptable (subject to there being no more than 5 planning obligations (already entered into since April 10) for that item at the time).
- 8.349 The application involves the redevelopment of a derelict industrial site to provide a high quality residential-led scheme within White City Regeneration Area. The planning obligations set out in the heads of terms are therefore considered necessary to make the development acceptable in planning terms, they are related to the development and fairly and reasonable in scale and kind to the development. A Section 106 agreement is therefore required to ensure the Centre House proposals would be in accordance with the statutory development plan and to secure the necessary infrastructure to mitigate the needs of the proposed development.
- 8.350 Appropriate planning obligations in relation to car parking, collaboration with adjoining owners, district heating network connection, wheelchair accessible spaces and provision of amenity space will be entered into to ensure that these obligations are properly enforceable by the Council, whether they relate to the application site or are linked to the White Living development.

8.351 In view of the fact the Section 106 agreement will be the subject of extended negotiations, officers consider that circumstances may arise which may result in the need to make minor modifications to the conditions and obligations (which may include the variation, addition, or deletion). Accordingly, the second recommendation has been drafted to authorise the Strategic Director for Growth and Place after consultation with the Director of Law and the Chair of the Planning and Development Control Committee, to authorise the changes he/she considers necessary and appropriate, within the scope of such delegated authority.

S106 OBLIGATIONS

8.352 It is anticipated that the S106 for this development will include the following heads of terms:

- Affordable Housing - Minimum of 35% (185) residential units (by habitable room/unit) to be affordable housing comprising an intermediate rent tenure for key workers/ICL employees and an appropriate cascade mechanism to ensure the affordable housing remains affordable in perpetuity.
- The affordable housing will be provided at the following affordability levels
 - 17 x units (9%) at £173 (estimated weekly rent)
 - 38 x units (21%) at £248 (estimated weekly rent)
 - 22 x units (12%) at £267 (estimated weekly rent)
 - 12 x units (6%) at £290 (estimated weekly rent)
 - 96 x units (52%) at 316 (estimated weekly rent)
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- An Early Stage review mechanism to assess whether the development could provide additional affordable housing on-site, and or, off-site contributions.
- £3,309,000 contribution (based on £6,938 per residential unit consistent with the level of contribution secured as part of the WCL development) towards infrastructure projects and types which contribute to the achievement of the objectives of Policies WCRA and WCRA1 within the White City Regeneration Area, including but not limited to projects and types identified in the Development Infrastructure Funding Strategy (DIFS), associated with the development within the WCRA.
- £657,000 contribution towards off-setting of CO2 emissions
- £395,000 contribution towards Employment and Training Initiatives
- Open Space - Unrestricted public access to be maintained to the proposed open space
- Travel Plans & Monitoring (£3,000 for each review at Years 1, 3 and 5).
- £30,000 Review of Local Controlled Parking Zone O
- Future residents (besides blue badge holders) prohibited from applying for on-street parking permits for controlled zones on surrounding streets.
- Wheelchair User Dwellings; 10% of dwellings to be wheelchair user dwellings, being fully wheelchair accessible and wheelchair dwellings to be marketed as widely as reasonably practicable with a 6-month exclusivity period.
- Requirement for development (incorporating White City Living) to provide a connection point to District Wide Heating system;
- Car Park Management Plan – including the mechanism for ensuring accessible parking spaces (within the basement of White City Living) are made available to

residents in the Centre House development; including any future basement parking in later phases in White City Living to ensure there is sufficient accessible parking in both developments.

- Access to the external courtyards and amenity space in White City Living Phases 1D and 2 for occupiers of Centre House.

9.0 CONCLUSION

- 9.1 The residential-led redevelopment of this site is considered to be broadly acceptable in planning policy terms at a local and strategic level. The site is located within the White City Regeneration Area, an area within which local and strategic policies require housing delivery to be optimised. The site is identified within 'White City East', where development proposals should provide large amounts of housing for residents across a variety of tenures, house sizes and affordability, whilst ensuring that development provides high quality places for living and working that are well integrated with, and respect the setting of, the surrounding area.
- 9.2 The proposed development will provide 527 high quality new homes with a mix of private and intermediate rent accommodation. 35% of the residential accommodation (by both habitable room and unit number) will be intermediate rent affordable housing with employees of Imperial College London, given the first option of occupation.
- 9.3 The LBHF Local Plan sets a target of 6,000 new homes to be delivered within the White City Opportunity Area; it is evident that it is very unlikely that this will be met. Given that the target is set to be increased to 7,000 within the New London Plan, the delivery of new homes within the opportunity area is now of greater importance than ever.
- 9.4 The Local Plan Strategic policies and the White City Opportunity Area Planning Framework identify the Regeneration Area and this site as being suitable for redevelopment and for tall buildings. The proposed development provides for a new east-west pedestrian route between the two centrally located taller buildings which will mark the new connection into the White City Living (WCL) development and its new, expansive public open spaces directly to the east. The proposed redevelopment will regenerate a large, highly accessible under-utilised brownfield site in central London. The redevelopment will create new links into the adjoining WCL site as well as into Imperial's White City Campus to the north.
- 9.5 The assessment of heritage, townscape and visual impacts concludes that the proposed development would have positive effects and would enhance the townscape. The curvilinear composition and massing of the proposed development relates positively to the form and scale of the Grade II Listed BBC Television Centre and its iconic question mark footprint. The existing buildings on the site have no architectural merit and their replacement with exceptional quality architecture will enhance the Wood Lane Conservation Area.
- 9.6 The proposed development is therefore sustainable development. It addresses the three dimensions to sustainable development referred to in paragraph 8 of the National Planning Policy Framework:

- Economic: it would contribute to building a strong, responsive and competitive economy, by ensuring that the Site is developed in a manner that supports growth;
 - Social: it would support strong, vibrant and healthy communities, by contributing significantly to the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment and providing desperately needed market and affordable housing;
 - Environmental: it would protect and enhance the natural, built and historic environment, improve biodiversity, minimise waste and pollution and mitigate climate change.
- 9.7 The development would achieve its public benefits without causing significant harm to local amenity, transport conditions, local or strategic views or local or global climate. It would integrate successfully into the evolving fabric of the area, regenerating the site and wider White City Regeneration Area to a quality befitting its inner London location.
- 9.8 An Environmental Statement (Volumes I, II and III) is submitted in support of the Application. This adheres to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, describing the potential, residual and cumulative environmental impacts relating to transport, ecology, waste management, land contamination, electronic interference, socio-economics, noise, flood risk and drainage, air quality, daylight, sunlight, overshadowing, microclimate and wind effects and townscape, heritage and visual impacts. Where environmental impacts, as a result of the scheme are considered to be more than minor, mitigation is identified to minimise the potential effects on the environment. The mitigation is provided for within the scope of planning conditions and s106 obligations recommended.
- 9.9 Having regard to the national, regional and local planning policy and taking into consideration of the quality of the proposed scheme and the benefits it would deliver; it is considered that the proposed development is acceptable and it is recommended that planning permission should be granted.