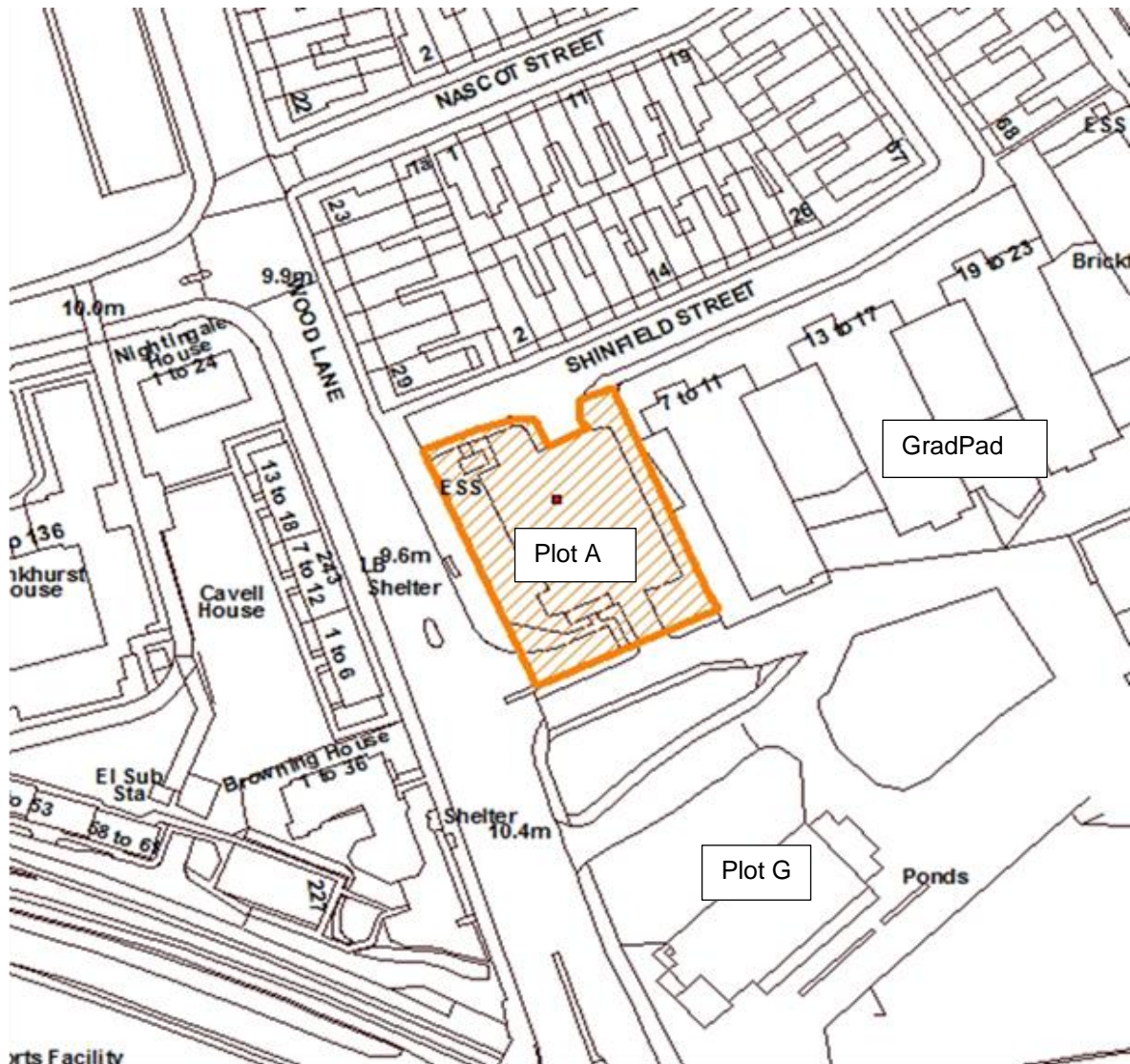


Ward: College Park & Old Oak

Site Address:

92 Wood Lane, London W12 0FJ



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Reg. No:
2022/03492/FUL

Date Valid:
30.11.2022

Committee Date:
17 October 2023

Conservation Area:
N/A

Case Officer:
Jesenka Oezdalga

Applicant:

Imperial College London

C/o Agent

Description:

Erection of part 3 storey rising to 12 storeys building, for purpose-built student accommodation (Sui Generis) use, with commercial, business and service (Class E) use at ground floor; ancillary campus security and facility management space, laundry, cycle parking and associated works.

Drg. Nos: See condition 2.

Application Type:

Full Detailed Planning Application

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Officer Recommendation:

1) That the Committee resolve that, subject to there being no contrary direction from the Mayor for London, that the Director of Planning and Property be authorised to grant planning permission upon the completion of a satisfactory legal agreement and subject to the conditions listed below.

2) That the Committee resolve that the Director of Planning and Property, after consultation with the Assistant Director, Legal Services and the Chair of the Planning and Development Control Committee be authorised to make any minor changes to the proposed Heads of Terms of the legal agreement or proposed conditions, which may include the variation, addition, or deletion of conditions, any such changes shall be within their discretion.

CONDITIONS

In line with the Town and Country Planning Act 1990 and the Town and Country Planning (Pre-commencement Conditions) Regulations 2018, officers have consulted the applicant on the pre-commencement conditions included in the agenda and the applicant has raised no objections.

1. Time Limit

The development hereby permitted shall not commence later than 3 years from the date of this decision.

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. Drawings

The development hereby permitted shall be carried out and completed in accordance with the following drawing numbers.

Floor Plans

- (00) _001 Rev PL01 – Site Location Plan;
- (00) _003 Rev PL01 – Existing Site Plan;
- (20) _100 Rev PL05 – Ground Floor Plan;
- (20) _101 Rev PL06 – Level 01;
- (20) _102 Rev PL05 – GA Plan Level 02;
- (20) _103 Rev PL04 – Level 03-05;
- (20) _106 Rev PL05 – Level 06-08;
- (20) _109 Rev PL04 – Level 09;
- (20) _110 Rev PL04 – Level 10-11;
- (20) _112 Rev PL03 – Roof Plan;

Proposed Elevations

- (20) _200 Rev PL04 – Elevation Wood Lane (West);
- (20) _201 Rev PL04 – Elevation North;
- (20) _202 Rev PL04 – Elevation East;
- (20) _203 Rev PL04 – Elevation South;

Proposed Sections

- (20) _300 Rev PL04 – Section

To ensure full compliance with the planning application hereby approved and to prevent harm arising through deviations from the approved plans, in accordance with D1, D2, D3, D4, D5, D7, D8, D9, D11, D12, D13, D14, HC1, HC3, HC4, H15, G5 and G7 of the London Plan 2021 and Policies DC1, DC2, DC3, DC7 and DC8 of the Local Plan (2018).

3) Hoardings

No development shall commence until a scheme for temporary fencing and/or enclosure of the site has been submitted to and approved in writing by the Local Planning Authority. The temporary fencing and/or enclosure shall be retained for the duration of the development in accordance with the approved details. No part of the temporary fencing and/or enclosure of the site shall be used for the display of commercial advertisement hoardings unless the relevant advertisement consent is sought from the Local Planning Authority.

To ensure a satisfactory external appearance and to prevent harm to surrounding residential occupiers, the street scene and public realm, in accordance with Policy D4 of the London Plan (2021), Policies DC1, DC8 and CC12 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

4) Construction Management Plan

Prior to the commencement of the development hereby permitted, a Construction Management Plan (CMP) shall be submitted to and approved in writing by the Local Planning Authority. The CMP shall include:

- (a) Relevant foundations, and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent).
- (b) Contractors' method statements.
- (c) Waste classification and disposal procedures and locations.
- (d) Location of site offices, ancillary buildings, plant, wheel-washing facilities, stacking bays and car parking.
- (e) Details of storage and any skips, oil and chemical storage.
- (f) Membership of the Considerate Contractors Scheme.
- (g) Delivery locations and the proposed control measures and monitoring for noise, vibration, lighting, 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.
- (h) 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.
- (i) Details of the use of on-road Ultra Low Emission Zone compliant Vehicles e.g., Euro 6 and Euro VI.
- (j) Provisions within the site to ensure that all vehicles associated with the construction works are properly washed and cleaned to prevent the passage of mud and dirt onto the highway.

The works shall be carried out in accordance with the relevant approved CMP throughout the project period.

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 SI 1, T7 and GG3 of the London Plan (2021) Policy D14 of the London Plan, Policies DC1, DC12, CC6, CC7, CC10, CC11, CC12 and CC13 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

5) Construction Logistics Plan

Prior to commencement of the development hereby permitted, a Construction Logistics Plan in accordance with Transport for London guidance shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). The Construction Logistics Plan shall cover the following minimum requirements:

- (a) Site logistics and operations.
- (b) Construction vehicle routing.
- (c) Contact details for site managers and details of management lines of reporting.
- (d) Location of site offices, ancillary buildings, plant, wheel-washing facilities, stacking bays and car parking.
- (e) Storage of any skips, oil, and chemical storage etc. and Access and egress points.
- (f) The impact on the bus stop adjacent to the site on Wood Lane and include details of temporary bus stop facilities if required during the construction phase of the development.
- (g) The Cumulative impact on Wood Lane associated with the construction of the TfL cycleway on Wood Lane, and other construction activities along the Wood Lane corridor.
- (h) Membership of the Considerate Contractors Scheme.

The works shall be carried out in accordance with the approved Construction Logistics Plan throughout the whole construction period.

To ensure that appropriate steps are taken to limit the impact of the proposed construction works on the operation of the public highway, the amenities of residents and the area generally in accordance with Policy T7 of the London Plan and T1, T6 and T7 of the Local Plan (2018).

6) Contamination: Preliminary Risk Assessment

No development shall commence until a preliminary risk assessment report is submitted to and approved in writing by the Local Planning Authority. 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 Policies CC9 and CC13 of the Local Plan (2018) and SPD Key Principles LC1 to LC7 (2018).

7) Contamination: Site Investigation Scheme

No development shall commence within the development until a site investigation scheme is submitted to and approved in writing by the Local Planning Authority. 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 Policies CC9 and CC13 of the Local Plan (2018) and SPD Key Principles LC1 to LC7 (2018).

8) Contamination: Quantitative Risk Assessment Report

Unless the Local Planning Authority agree in writing that a set extent of development must commence to enable compliance with this condition, no development shall commence until, 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 Local Planning Authority. 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 Policies CC9 and CC13 of the Local Plan (2018) and SPD Key Principles LC1 to LC7 (2018).

9) Contamination: Remediation Method Statement

Unless the Local Planning Authority 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 Local Planning Authority. 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 Policies CC9 and CC13 of the Local Plan (2018) and SPD Key Principles LC1 to LC7 (2018).

10) Contamination: Verification Report

Unless the Local Planning Authority agree in writing that a set extent of development must commence to enable compliance with this condition, no development shall commence until the approved 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 Local Planning Authority. 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 Local Planning Authority is to be informed immediately and no further development (unless otherwise agreed in writing by the Local Planning Authority) 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 Local Planning Authority. 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 Policies CC9 and CC13 of the Local Plan (2018) and SPD Key Principles LC1 to LC7 (2018).

11) Contamination: Onward Long-Term Monitoring Methodology

Unless the Local Planning Authority agree in writing that a set extent of development must commence to enable compliance with this condition, no development (except Enabling Works) shall commence until an onward long-term monitoring methodology report is submitted to and approved in writing by the Local Planning Authority 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 Local Planning Authority 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 Policies CC9 and CC13 of the Local Plan (2018) and SPD Key Principles LC1 to LC7 (2018).

12) Piling Method Statement

No impact piling shall take place until a piling method statement (detailing the type of piling to be undertaken and the methodology by which such piling would be carried out including measures to prevent and minimise the potential for damage to subsurface water or sewerage infrastructure, and the 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.

To prevent any potential to impact on local underground water and sewerage utility infrastructure, in accordance with Policies CC3 and CC5 of the Local Plan 2018 and Key Principles of the Planning Guidance SPD 2018. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the details of the piling method statement.

13) Air Quality Dust Management Plan (Construction)

Prior to the commencement of the construction phase of the development hereby permitted, an Air Quality Dust Management Plan (AQDMP) to mitigate air pollution from the construction phase of the development shall be submitted to and approved in writing by the Local Planning Authority. The AQDMP submitted shall be in accordance with the Councils AQDMP Template 'C' and shall include the following details:

(a) Site Location Plan indicating sensitive off-site receptors within 50m of the red line site boundaries.

(b) Construction Site and Equipment Layout Plan.

(c) Inventory and Timetable of dust generating activities during construction site activities.

(d) Air Quality Dust Risk Assessment (AQDRA) that considers the potential for dust soiling and PM10 (human health) impacts for sensitive receptors off-site of the development within 250 m of the site boundaries during the demolition phase and is undertaken in compliance with the methodology contained within the Mayor of London 'The Control of Dust and Emissions during Construction and Demolition', SPG, July 2014 and its subsequent amendments.

(e) Site Specific Dust, and NO_x Emission mitigation and control measures including for on-road and off-road construction traffic as required by the overall Medium Dust Risk Rating of the site and shall be in a table format.

(f) Details of Site Particulate (PM10) and Dust Monitoring Procedures and Protocols including locations of a minimum of 2 x MCERTS compliant Particulate (PM10) monitors on the site boundaries used to prevent levels exceeding predetermined PM10 Site Action Level (SAL) of 190 µg/m³, measured as a 1-hour mean. Prior to installation of the PM10 monitors on site the calibration certificates of MCERTS compliant PM10 monitors and the internet-based log-in details to enable access to

the real-time PM10 monitoring data from the PM10 monitors shall be issued to Hammersmith & Fulham Council by e-mail to constructionairqualitymonitoring@lbhf.gov.uk. The data from the on-site Particulate (PM10) monitors shall also be made available on the construction site air quality monitoring register website <https://www.envimo.uk>

(g) Details of the Non-Road Mobile Machinery (NRMM) used on the site with CESAR Emissions Compliance Verification (ECV) identification that shall comply with the minimum Stage V NOx and PM10 emission criteria of The Non-Road Mobile Machinery (Type-Approval and Emission of Gaseous and Particulate Pollutants) Regulations 2018 and its subsequent amendments. This will apply to both variable and constant speed engines for both NOx and PM. An inventory of all NRMM for the first phase of construction shall be registered on the NRMM register <https://london.gov.uk/non-road-mobile-machinery-register> prior to commencement of construction works and thereafter retained and maintained until occupation of the development.

(h) Details of the use of on-road Ultra Low Emission Zone (ULEZ) compliant vehicles e.g., minimum Petrol/Diesel Euro 6 and Euro VI

Developers must ensure that on-site contractors follow best practicable means to minimise dust, particulates (PM10, PM2.5) and NOx emissions at all times. Approved details shall be fully implemented and permanently retained and maintained during the construction phases of the development.

To comply with the requirements of Policy SI 1 of the London Plan and Policy CC10 of the Local Plan (2018).

14) Ventilation Strategy

Prior to commencement of above ground works in the development hereby permitted, a Ventilation Strategy Report to mitigate the impact of existing poor air quality for the self-contained student accommodation (Class Sui Generis) shall be submitted to and approved in writing by the Local Planning Authority. This is applicable to all locations on all residential floors where the Annual Mean Nitrogen Dioxide (NO₂), and Particulate (PM₁₀, PM_{2.5}) concentrations are equal to 30ug/m³, 20ug/m³ and 10 ug/m³ respectively and where current and future predicted pollutant concentrations are within 5% of these limits. The report shall include the following information:

(a) Details and locations of the ventilation intake locations at rear roof level or on the rear elevations of all student accommodation floors

(b) Details and locations of restricted opening windows (maximum 200mm for emergency purge ventilation only) for all habitable rooms (Bedrooms, Living Rooms, Study).

(c) Details and locations of ventilation extracts, to demonstrate that they are located a minimum of 2 metres away from the air ventilation intakes, to minimise the potential for the recirculation of extract air through the supply air ventilation intake in

accordance with paragraph 8.9 part 'C' of Building Standards, Supporting Guidance, Domestic Ventilation, 2nd Edition, The Scottish Government, 2017.

(d) Details of the independently tested mechanical ventilation system with Nitrogen Oxides (NO_x) and Particulate Matter (PM_{2.5}, PM₁₀) filtration with air intakes on the rear elevation to remove airborne pollutants. The filtration system shall have a minimum efficiency of 90% in the removal of Nitrogen Oxides/Dioxides, Particulate Matter (PM_{2.5}, 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. 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.

To comply with the requirements of Policy SI1 of the London Plan and Policy CC10 of the Local Plan (2018).

15) Ventilation Strategy (compliance)

Prior to occupation of the development hereby permitted, details of a post installation compliance report of the approved ventilation strategy, as required by Condition 14, to mitigate the impact of existing poor air quality shall be submitted to and approved in writing by the Local Planning Authority. The report shall be produced by an accredited Chartered Building Services Engineer (CIBSE). Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

To comply with the requirements of Policy SI1 of the London Plan and Policy CC10 of the Local Plan (2018).

16) Zero Emission Heating compliance

Prior to occupation of the development hereby permitted, details of the installation of the Zero Emission MCS certified Air/Water Source Heat Pumps or Electric Boilers to be provided for space heating and hot water for the Student Accommodation (Class Sui Generis) use and the non-residential uses (Class E) shall be submitted to and approved in writing by the Local Planning Authority. Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

To comply with the requirements of Policy SI1 of the London Plan and Policy CC10 of the Local Plan (2018).

17) Ultra Low Emission Strategy

Prior to occupation of the development hereby permitted, an Ultra Low Emission Strategy (ULES) shall be submitted to and approved in writing by the Local Planning Authority. Details shall include:

- (a) Procurement policy and processes for contractors and suppliers that will incentivise and prioritise the use of Zero Exhaust Emission Vehicles in accordance with the emission hierarchy of 1) Walking Freight Trolley 2) Cargo bike (3) Electric Vehicle, (4) Alternative Fuel e.g., Hydrogen.
- (b) Use of Zero Exhaust Emission Vehicles in accordance with the emissions hierarchy (1) Walking Freight Trolleys (2) Cargo bike (3) Electric Vehicle, (4) Alternative Fuel e.g., CNG, Hydrogen.
- (c) Facilities and measures that will minimise the impact of vehicle emissions from increasing personal deliveries e.g., carrier agnostic parcel locker, concierge, Cargo bike bays etc.
- (d) Reduction and consolidation of deliveries and collections e.g., Waste
- (e) Re-timing of deliveries and collections outside of peak traffic time periods of 07:00-10:00 and 15:00-19:00 hrs.

The ULES shall be monitored and reviewed on an annual basis and any subsequent modifications or alterations to the ULES should be submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented prior to occupation and the ULES hereby permitted shall thereafter operate in accordance with the approved details.

To comply with the requirements of Policy SI 1 of the London Plan and Policy CC10 of the Local Plan (2018).

18) Revised Flood Risk & Sustainable Drainage Strategy (SuDS)

Prior to commencement of the development hereby permitted, a revised Flood Risk and Sustainable Drainage Strategy (SuDS), identifying further details updated flood mitigation measures and details of how surface water would be managed on-site in line with principles of the Flood Risk Assessment (Ref: 075208-CUR-00-XX-RP-C-92001 Rev P04) be submitted to and approved in writing by the Local Planning Authority.

Information shall include details on the proposed flood mitigation measures to the design, location, and attenuation capabilities of the proposed sustainable drainage measures including rain gardens, permeable paving, green roofs and attenuation tanks. Details of the proposed flow controls and flow rates for any discharge of surface water to the combined sewer system should also be provided, to demonstrate achievement of greenfield rates for final discharges. Rainwater harvesting should also be integrated to collect rainwater for re-use in the site. The Strategy shall be implemented in accordance with the approved details, and thereafter all SuDS measures shall be retained and maintained in accordance with the approved details and shall thereafter be permanently retained in this form.

To ensure that sufficient drainage capacity is made available to cope with the new development, and to avoid adverse environmental impact upon the community and to prevent any increased risk of flooding and to ensure the satisfactory storage of/disposal of surface water from the site in accordance with Policies SI 12 and SI 13 of the London Plan (2021) and Policy CC3 and CC4 of the Local Plan (2018).

19) Revised Drainage Strategy

Prior to commencement of the development hereby permitted a revised drainage strategy detailing any on and/or off-site drainage works, shall be submitted to and approved in writing by the Local Planning Authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the relevant phase shall be accepted into the public system until the drainage works referred to in the strategy have been completed. Details shall be implemented in accordance with the approved details and thereafter permanently retained in this form.

To ensure that sufficient drainage capacity is made available to cope with the new development; and to avoid adverse environmental impact upon the community in accordance with Policies SI 12 and SI 13 of the London Plan (2021).

20) Green/Brown Roofs

Prior to commencement of relevant works, details of all green and brown roofs within the development; including the identification of further opportunities for these roofs, including details of types of roofs and a planting maintenance plan shall be submitted to and approved in writing by the Local Planning Authority. The development shall not be occupied until the scheme has been carried out in accordance with the approved details and shall thereafter be permanently retained in this form.

To ensure the provision of green roofs in the interests of sustainable urban drainage and habitat provision, in accordance with Policies SI 12, S1 13, G1 and G6 of the London Plan (2021) and Policy OS5 and CC4 of the Local Plan (2018).

21) Sustainability

Within 6 months of the of occupation or any use of the development, a BREEAM certificate confirming that the development achieves an 'Excellent' BREEAM rating shall be submitted to and approved in writing by the Local Planning Authority.

In the interests of energy conservation, reduction of CO2 emissions and wider sustainability, in accordance with Policies SI 1, SI 2, and SI 3 of the London Plan (2021) and Policies CC1, CC2 of the Local Plan (2018).

22) Revised Energy Strategy

Prior to commencement of the development hereby permitted, a revised Energy Strategy for the development shall be submitted to and approved in writing by the Local Planning Authority. The revised strategy shall include details of energy efficiency and low/zero carbon technologies and confirm that CO2 emissions would be reduced in line with the London Plan targets. No part of the development shall be used or occupied until it has been carried out in accordance with the approved details and shall thereafter be permanently retained in this form.

In the interests of energy conservation and reduction of CO2 emissions, in accordance with Policies London Plan Policies SI 2, SI 3 and SI 4 and Policies CC1 and CC2 of the Local Plan (2018).

23) Waste Capacity (Thames Water)

The development shall not be occupied until confirmation has been submitted to and approved in writing by the Local Planning Authority, in consultation with Thames

Water, that either waste capacity exists off site to serve the development, or all wastewater network upgrades required to accommodate the additional flows from the development have been completed prior to occupation of the development, or an infrastructure phasing plan has been agreed with Thames Water to allow the development to be occupied.

The development may lead to sewage flooding and Thames Water may need to undertake network reinforcement works to ensure sufficient capacity is provided to accommodate additional flows from the new development. The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](https://www.thameswater.co.uk/preplanning).

24) Water Infrastructure (Thames Water)

The development shall not be occupied until confirmation has been submitted to and approved in writing with Thames Water that either all water network upgrades required to accommodate the additional flows from the development has been completed, or an infrastructure phasing plan has been agreed with Thames water to allow the development to be occupied. Where an infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed infrastructure phasing plan.

The development may lead to no/low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](https://www.thameswater.co.uk/preplanning).

25) Noise Levels

Prior to commencement of the development hereby permitted, a noise assessment shall be submitted the Local Planning Authority for approval in writing of external noise levels incl. reflected and re-radiated noise and details of the sound insulation of the building envelope, and of acoustically attenuated mechanical ventilation as necessary to achieve internal room and (if provided) external amenity noise standards in accordance with the criteria of BS8233:2014. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

To ensure that the amenity of occupiers of the development site is not adversely affected by noise from transport and industrial/ commercial noise sources, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

26) Separation of commercial and noise sensitive premises.

Prior to commencement of the development hereby permitted, details shall be submitted to and approved in writing by the Local Planning Authority, of the sound insulation of the floor/ ceiling/ walls separating the commercial part(s) of the development from the student accommodation. Details shall demonstrate that the sound insulation value $D_{nT,w}$ is enhanced by at least 10dB 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 studios/ noise sensitive premises.

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

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).

27) Separation of noise sensitive rooms in the student accommodation studios

Prior to commencement of the development hereby permitted, details shall be submitted to and approved in writing by the Local Planning Authority, 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 the student accommodation. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

To ensure that the amenity of occupiers of the development site is not adversely affected by noise transmission between adjoining studio units, at unreasonable levels, due to unsuitable layout and arrangement of rooms and communal areas, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

28) Anti- vibration mounts and silencing of machinery etc.

Prior to their installation, details of anti-vibration measures shall be submitted to and approved in writing by the Local Planning Authority. The measures shall ensure that machinery, plant/ equipment is 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.

To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

29) Hours of Use of Terraces

Any outdoor use of the terrace area on Level 09 associated with the student accommodation use shall only be used between 07.00 hours and 23:00 hours daily.

To ensure that control is exercised over the use of these terrace so that undue harm is not caused to the amenities of the occupiers of the development and neighbouring residential properties because of noise and disturbance, particularly in the quieter night-time hours, in accordance with policy CC11 and CC13 of the Local Plan (2018) and guidance within the Planning Guidance Supplementary Planning Document (2018).

30) Flat roof areas

No part of any roof of the development identified on the approved plans (excluding the Level 09 communal terrace area) shall be used as a roof terrace or other form of open amenity space. No railings or other means of enclosure shall be erected on the remaining roofs for the purpose of a roof terrace or other form of open amenity

space, and no other alterations shall be carried out to any elevations to form access onto the roofs or open spaces.

The use of the roofs as a terrace or open areas as amenity spaces would increase the likelihood of harm to the existing residential amenities of the occupiers of neighbouring properties as a result of noise and disturbance and loss of privacy contrary to Policies HO11 and CC11 of the Local Plan (2018).

31) Noise from Use and Activities.

Noise from uses and activities within the building/ development site shall not exceed the criteria of BS8233:2014 at neighbouring noise sensitive/ habitable rooms and private external amenity spaces.

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

32) Lighting

Prior to their installation, details of external artificial lighting shall be submitted to and approved in writing by the Local Planning Authority. 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 Note 01/21: Guidance Notes for the Reduction of Obtrusive Light'. 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 building does not cause excessive light pollution and to conserve energy when they are not occupied, in accordance with Policy CC12 of the Local Plan (2018).

33) Materials

Prior to the commencement of the façade installation, details of particulars and samples (where appropriate) of all the materials to be used in all external faces and roofs of the building; including details of the colour, composition and texture of the pre-cast panels and metal cladding; details of all surface windows including window opening and glazing styles (in a manner that will take into account the privacy and amenity of residential premises overlooked by the development); balustrades to flat roofs, and roof terraces; roof top plant and general plant screening; entrances and ground floor glazing, including shopfronts, shall be submitted to and approved in writing by Local Planning Authority. The development shall be carried out in accordance with the details as approved and thereafter permanently retained in this form.

To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, and to preserve the character and appearance of the surrounding conservation areas and other heritage assets; in accordance with Policies D3, D4, D8, D9 and HC1 of the London Plan, Policies DC1, DC2, DC3 and

DC8 of the Local Plan (2018) and guidance contained within the Planning Guidance Supplementary Planning Document (2018).

34) Sample Panels

Prior to the installation of the facade installations, sample panels for the development, shall be produced for on-site inspection by Council Officers, along with the submission to the Local Planning Authority of samples of these materials, for subsequent approval in writing. The development must be carried out in accordance with the submitted material samples and sample panel, and the development shall thereafter be permanently retained and maintained as such.

To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, and to preserve the character and appearance of the surrounding conservation areas and other heritage assets; in accordance with Policies D3, D4, D8, D9 and HC1 of the London Plan, Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018), and guidance contained within the Planning Guidance Supplementary Planning Document (2018).

35) 1:20 Details - Building

Prior to the commencement of the above ground works, detailed drawings at a scale not less than 1:20 (in plan, section, and elevation) of typical sections/bays of the approved buildings shall be submitted and approved in writing by the Local Planning Authority. These shall include details of the proposed façade and cladding treatment, fenestration (including framing and glazing details), balustrades (including roof terrace), entrances, and ground floor glazing details. The development shall be carried out in accordance with the details as approved and thereafter permanently retained in this form.

To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, and to preserve the character and appearance of the surrounding conservation areas and other heritage assets; in accordance with Policies D3, D4, D8, D9 and HC1 of the London Plan, Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018), and guidance contained within the Planning Guidance Supplementary Planning Document (2018).

36) 1:20 Roof Top Plant Enclosures

Prior to completion of the above ground core structures, detailed drawings at a scale not less than 1:20 (in plan, section, and elevation) of the rooftop plant enclosures for the building shall be submitted to and approved in writing by the Local Planning Authority. No part of the building shall be used or occupied until the enclosures have been constructed in accordance with the approved details, and the enclosures shall thereafter be permanently retained in this form.

To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, in accordance with Policies D3, D4, D8, D9 and HC1 of the London Plan, Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018).

37) Window Glass

The window glass of the ground floor Class E use hereby approved shall be clear and shall not be mirrored, tinted or otherwise obscured.

To ensure a satisfactory external appearance and to prevent harm to the street scene, in accordance with policies DC1 and DC2 of the Local Plan (2018).

38) Entrance Doors

The ground floor entrance doors to the development and integral lift/stair cores shall not be less than 1-metre-wide and the threshold shall be at the same level as the adjoining ground level fronting the entrances to ensure level access.

To ensure the development provides ease of access for all users, in accordance with Policy E10 of the London Plan, and Policy DC1 and HO6 of the Local Plan (2018).

39) Self-Closing Doors

Prior to first occupation of each building, all external doors shall be fitted with self-closing devices, which shall be maintained in an operational condition; and at no time shall any external door be fixed in an open position.

To ensure that the amenity of occupiers of the development site and surrounding properties are not adversely affected by noise /odour /smoke /fumes, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

40) Secure by Design

Within 3 months prior to occupation, a statement of how 'Secure by Design' requirements are to be adequately achieved shall be submitted to and approved in writing by the Local Planning Authority. Such details shall include, but not be limited to site wide public realm CCTV (including the pedestrian link between Shinfield Street and the campus) and a feasibility study relating to linking CCTV with the Council's borough wide CCTV system, access controls, lower ground floor security measures and means to secure the site throughout construction in accordance with BS8300:2009. No part of the development shall be used or occupied until these measures have been implemented in accordance with the approved details, and the measures shall thereafter be permanently retained in this form.

To ensure that the development incorporates suitable design measures to minimise opportunities for, and the perception of crime and provide a safe and secure environment, in accordance with Policy D11 of the London Plan (2021), and Policies DC1 and DC8 of the Local Plan (2018).

41) Protection of Existing Trees

The development hereby permitted shall not commence until the two existing trees in the proximity of the development to be retained, including trees that sit within the proposed hoarding line of the development, have been protected from damage in accordance with BS5837:2012 during both the demolition and construction works.

To ensure that trees on site are retained and to prevent harm during the course of the construction works, in accordance with accordance with Policies DC1, DC8, OS2 and OS5 of the Local Plan (2018).

42) Landscaping & Public Realm

Prior to commencement of the landscape/public realm works hereby permitted, details of the proposed soft and hard landscaping of all areas external to the building shall be submitted to and approved in writing by the Local Planning Authority. The details shall include, but are not limited to: planting schedules and details of the species, height and maturity of any trees and shrubs, including sections through the planting areas; depth of tree pits, containers, and shrub beds; details relating to the access of each building, pedestrian surfaces, wayfinding, disabled drop off areas, loading bays, pedestrian crossings means of pedestrian/cyclist conflict resolution, materials, kerb details, external steps and seating, street furniture, bins and lighting columns that ensure a safe and convenient environment for blind and partially sighted people. The landscaping works shall be carried out in accordance with the approved details and shall thereafter be permanently retained in this form.

To ensure a satisfactory external appearance of the development and relationship with its surroundings, and the needs of the visually impaired are catered for in accordance with the Equality Act 2010, Policies D3, D4, D8, D9 and HC1 of the London Plan, Policies DC1, DC2, DC3, DC8, OS2 and OS5 of the Local Plan 2018.

43) Replacement Landscaping

Any landscaping removed or severely damaged, dying or becoming seriously diseased shall be replaced with a tree or shrub of equivalent size and species to that originally required to be planted.

To ensure a satisfactory external appearance and biodiversity in accordance with policies OS4, DC2 and DC8 of the Local Plan (2018) and in the interest of air quality, to comply with the requirements of Policy CC10 of the Local Plan (2018).

44) Artificial Nesting Opportunities

Prior to the commencement of the development, details of 'artificial nesting opportunities' within the development shall be submitted to the Local Planning Authority for approval. These details shall incorporate bird and bat boxes, including specialise boxes for Black Redstarts. The details to be submitted to the Local Planning Authority for approval shall include a timetable for provision and shall be implemented in accordance with the approved timetable and thereafter retained in accordance with the approved details.

To ensure that satisfactory provision is made for 'artificial nesting opportunities' within the development thereby enhancing the biodiversity of the site in accordance with policy OS4 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD 2018.

45) Television Interference

Details of methods proposed to identify any television interference caused by the proposed development, including during the construction process, and the measures proposed to ensure that television interference that might be identified is remediated in a satisfactory manner shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development above ground (excluding site clearance and demolition) hereby permitted. The approved

remediation measures shall be implemented immediately that any television interference is identified.

To ensure that television interference caused by the development is remediated, in accordance with Policies DC2 and DC10 of the Local Plan (2018).

46) Airwaves Interference Study

Prior to commencement of development the following details shall be submitted to and approved in writing by the Local Planning Authority:

- (a) The completion of a Base-Line Airwaves Interference Study (the Base-Line Study) to assess airwave reception within/adjacent to the site; and of required; and
- (b) The implementation of a Scheme of Mitigation Works for the purpose of ensuring nil detriment during the Construction Works identified by the Base-Line Study.

Such a Scheme of Mitigation Works shall be first submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details prior to occupation and shall thereafter be permanently retained in this form.

To ensure that the existing airwaves reception is not adversely affected by the proposed development, in accordance with Policies DC1, DC2 and DC8 of the Local Plan (2018).

47) Permitted Development Rights - Telecommunications

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking or re-enacting that principal 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.

To ensure that the visual impact of telecommunication equipment upon the surrounding area can be considered, in accordance with Policies DC1 and DC8 of the Local Plan (2018).

48) Window Cleaning Equipment

Prior to the occupation of the development hereby approved, details of the proposed window cleaning equipment shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the appearance, means of operation and storage of the cleaning equipment. The building shall not be used or occupied until the equipment has been installed in accordance with the approved details and shall thereafter be permanently retained in this form.

To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, in accordance with Policies D3, D4, D8, D9 and HC1 of the London Plan, Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018).

49) Cycle Parking

The development shall not be used or occupied until the provision of cycle parking spaces have been provided in accordance with the approved plans and made available to visitors and staff, and such cycle storage/parking facilities shall be permanently retained thereafter in accordance with the approved details.

To ensure the suitable provision of cycle parking within the development to meet the needs of future site occupiers, in accordance with Policy T5 of The London Plan and Policy T3 of the Local Plan (2018).

50) Active Travel Zone Assessment

Prior to the first occupation of the development hereby permitted, a night-time Active Travel Zone Assessment shall be submitted to and approved in writing by the Council. The assessment shall be undertaken in accordance with TfL's methodology and shall include, but not be limited to, details of the management of personal safety and lighting. Any necessary mitigation identified within the approved night-time Active Travel Zone Assessment shall be implemented in full prior to the first occupation of each use and shall be permanently retained thereafter.

To ensure the quality, safety and accessibility of pedestrians and cyclists in accordance with Policy T1, T2, T4 and T5 of the London Plan (2021).

51) Refuse

Prior to the first occupation of the development hereby permitted, the refuse storage enclosures, including provision for the storage of recyclable materials shall be provided as indicated on the approved drawings. All the refuse/recycling generated by the building hereby approved shall be stored within the approved areas and shall be permanently retained thereafter in accordance with the approved details.

To protect the environment and to ensure that satisfactory provision is made for refuse/recycling storage and collection, in accordance with Policies CC6 and CC7 of the Local Plan (2018) and SPD Key Principle WM1 (2018).

52) Aerobic Food Digester (AFD)

Prior to occupation of the development hereby permitted, details of the installation/commissioning of Aerobic Food Digesters (AFD) for the non-residential uses (Class E) to mitigate the impact of air pollution from vehicles associated with the removal of food waste shall be submitted to and approved in writing by the Local Planning Authority. Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

To comply with the requirements of Policy SI1 of the London Plan and Policy CC10 of the Local Plan (2018).

53) Inclusive Access Management Plan

No part of the development hereby approved shall be occupied or used until an Inclusive Access Management Plan has been submitted to and approved in writing by the Local Planning Authority. The plan shall set out a strategy for ongoing consultation with specific interest groups regarding accessibility. On-going

consultation shall then be carried out in accordance with the approved IAMP. The development shall not be operated otherwise than in accordance with the Inclusive Access Management Plan as approved and thereafter be permanently retained in this form.

To ensure that the proposal provides an inclusive and accessible environment in accordance with the Policy E10 of the London Plan (2021) and Policy E3 of the Local Plan (2018).

54) Lifts

Prior to first occupation of each building, details of fire rated lifts shall be submitted and approved in writing by the Local Planning Authority. All the lifts shall have enhanced lift repair services, running 365 days/24-hour cover, to ensure 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.

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 D12 of the London Plan (2021), and Policy DC1 and HO6 of the Local Plan (2018).

55) Fire Strategy

The development shall be carried out and completed in accordance with the submitted Fire Statement prepared by Hoare Lea consultants dated 26 May 2023. The development shall be implemented in accordance with these details prior to occupation and shall thereafter be permanently retained in this form.

To ensure full compliance with, in accordance with Policy D12 of the London Plan (2021).

56) Student Accommodation

The student use shall be used solely for the purposes of a student accommodation only during the academic year and for no other purpose, whether permitted by the Town and Country Planning (Use Classes) Order 1987 (as amended), or otherwise, or any subsequent Order or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

In granting this permission, the Council has had regard to the circumstances of the case. The Council wishes to have an opportunity to consider such circumstances at that time, and to ensure the uses are compatible with the adjoining land uses and to ensure that the amenity of occupiers residing in surrounding residential properties would be safeguarded in accordance with Policies WCRA, WCRA 1, CF3, DC1, DC2, DC7, DC8, E1, HO11, T1, T2, TLC3, TLC5, CC10, CC11, CC11, CC12 and CC13 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

57) Hours of Operation (Ground floor Commercial Use)

The hours of operation of any Class E floorspace hereby approved within the development hereby permitted shall be between 0700 hours to 2300 hours on any day.

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).

58) Revised Whole Life-Cycle Carbon Assessment

Prior to commencement of the development hereby permitted, an updated Whole Life-Cycle Carbon Assessment for the development shall be submitted to and approved in writing by the Local Planning Authority. The development shall be built in compliance with the approved details.

Within 6 months of occupation or any use of the development, a post-construction monitoring report setting out how the development met with the requirements of the approved Assessment in part (i) of the condition shall be submitted to and approved in writing by the Local Planning Authority.

In the interests of energy conservation and reduction in carbon, in accordance with London Plan Policy S I2.

59) Circular Economy Assessment Post-Construction Report

Within 6 months of occupation or any use of the development, a post-construction monitoring report setting out how the construction process met the requirements of the approved Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority.

In the interests of reducing waste and supporting the Circular Economy, in accordance with London Plan Policy S I7.

JUSTIFICATION FOR APPROVING THE APPLICATION

1) Land Use: The proposed land uses are supported by adopted policy. Officers consider that the residential led, student accommodation use is appropriate in the White City Opportunity / Regeneration Area which is well served and accessible by public transport. The proposal has adopted a design-led approach to optimise the capacity of a site in keeping with its surroundings. The student accommodation use in conjunction with the ground floor Class E use is supported in land use terms subject to the satisfaction of other development plan policies and considered to be in accordance with the NPPF; London Plan Policies GG1, GG2, SD1, H1, H15 and Local Plan Policies WCRA, WCRA1 and HO9.

2) Student Accommodation: The quality of the student accommodation is considered to be of an acceptable level and will meet an identified need as well each of the criteria set out in the development plan. 35% of the accommodation would be

affordable as set out within the London Plan and an Education Provider and nominations agreement will be secured by legal agreement prior to occupation together with a final Student Management Plan. As such is considered to be in accordance with London Plan Policy H15 and Local Plan Policy HO9.

3) Design and Heritage: It is considered that the proposals will deliver good quality architecture which optimises the capacity of the site with good quality student and commercial accommodation. The proposed development is a tall building located in a regeneration area and therefore is supported in principle by Local Plan Policy (2018) DC3 and London Plan (2021) Policy D9. Following careful assessment, it is not considered the development would have a disruptive and harmful impact on the skyline and would comply with the impact frameworks of both policies. The proposal is not considered to result in any harm to the setting of any adjacent heritage assets, having regard and applying the statutory provisions of Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposal is also considered to be in line with national guidance in the NPPF and strategic local policies on the historic environment and urban design. As such, the Proposed Development is considered acceptable having regard to the NPPF, NPPF, Policies D3, D4, D6, D8, D9 and HC1 of the London Plan (2021) and Policies DC1, DC2, DC3, DC7, and DC8 of the Local Plan (2018).

4) Impact on Neighbouring Properties: The impact of the proposed development upon adjoining occupiers is considered acceptable. There would be no significant worsening of noise/disturbance and overlooking, no unacceptable loss of sunlight or daylight or outlook to cause undue detriment to the amenities of neighbours. In this regard, the development would respect the principles of good neighbourliness. The proposed development therefore accords with Policies D3, D6, D8 and D13 T4, D4, D11 and D14 of the London Plan 2021 and Policies CC11, CC13, DC2, DC3, HO4 and HO11 of the Local Plan 2018 and Key Principle HS6 and HS7 of the Planning Guidance SPD.

5) Transport: 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. Provision would be made for only blue badge car parking spaces and cycle parking. External impacts of the development would be controlled by conditions and section 106 provisions, related to blue badge parking, cycle and refuse storage, delivery and servicing management plan and a construction logistics plan while the monitoring of the travel plans is secured by legal agreement. Adequate provision for storage and collection of refuse and recyclables would be provided. The accessibility level of the campus is good and therefore it is considered that the site is well served by public transport. In addition, servicing and road safety and travel planning initiatives would be implemented in and around the site to mitigate against potential issues. The proposed development therefore accords with Policies T1, T2, T3, T4, T5, T6.1, T6.4 and T6.5 of the London Plan 2021 and Policies T3, T4, T5, T7 and CC7 of the Local Plan 2018.

6) Sustainability and Energy: The proposed development has been designed to meet the highest standards of sustainable design and construction. The application proposes several measures to reduce CO2 emissions to exceed London Plan targets, a revised Energy Strategy is secured by condition to ensure the highest

levels of savings. The proposal would achieve an 'excellent' BREEAM rating and delivering this is secured by condition. The proposal would incorporate brown and green roofs and a revised Sustainable Urban Drainage Strategy would be required by condition to reflect final design detail. The proposal would thereby seek to reduce pollution, waste, and minimise its environmental impact. Subject to the inclusion of conditions requiring the implementation of the submitted and revised documents requiring submission of Sustainability and Energy Statements, the proposed development accords with Policies SI2, SI3 and SI4 London Plan Policies of the London Plan 2021 and Policies CC1, CC2 and CC7 of the Local Plan 2018.

7) Flood Risk and drainage: The site is in Flood Zone 1. A Flood Risk Assessment (FRA) has been submitted which advises standard construction practices to ensure the risk of flooding at the site remains low, however mitigation measures are required to be submitted and approved by condition. Sustainable drainage systems (SUDS) would be integrated into the development to cut surface water flows into the communal sewer system. Subject to the inclusion of conditions requiring the submission of a Surface Water Drainage Strategy and submission of an updated Flood Risk Assessment officers consider that the proposed approach would be acceptable and in accordance with Policies SI 12 and SI 13 of the London Plan 2021 and policy requiring flood risk assessment and development to mitigate flood risk, Policies CC2, CC3, CC4 and CC5 of the Local Plan 2018 which requires development to minimise future flood risk.

8) Air Quality: There will be an impact on local air quality because of the construction of the proposed development. However, inclusion of conditions prior to the commencement of above ground works for each phase of the development are included to mitigate the development. During construction, an Air Quality Dust Management Plan for construction works is required by condition which will mitigate the air quality impacts of the development. In addition, a contribution toward the monitoring of air quality during the construction works to mitigate against potential issues is secured through the S106 Agreement. The Air Quality Assessment shows that there is no significant impact on local air quality during the operation phase. It is noted that there is not expected to be an exceedance of the one-hour objective at any onsite location where there is relevant exposure, and the air quality neutral target is met. As such the proposed development can accord with Policy SI 1 of the London Plan 2021 and Policy CC10 of the Local Plan 2018.

9) Land Contamination: Conditions will ensure that the site would be remediated to an appropriate level for the sensitive residential and open space uses. The proposed development therefore accords with Policies CC9 of the Local Plan 2018.

10) Microclimate: The development would not result in an unacceptable wind microclimate that would cause harm, discomfort or safety issues to pedestrians or the environment around the buildings or surrounding properties. Conditions are secured to provide additional mitigation measures through the materials and landscaping. The proposal is considered to comply with Policies GG1, D8 and D9 of the London Plan 2021 and Policies DC3 and CC2 of the Local Plan 2018.

11) Arboriculture, Ecology and Biodiversity: As part of the development new trees/shrubs will be planted within the public realm and within the roof terraces. The

new public realm incorporates recommendations to enhance the biodiversity value such as the inclusion of wildlife planting as part of the landscaping and a biodiverse roof. Subject to the inclusion of conditions the proposed development accords with Policies G5 and G7 of the London Plan 2021 and Policies OS1 and OS5 of the Local Plan 2018 in terms of ecological and urban greening.

12) Security: No objections are received from the Designing Out Crime Officer. The overall security strategy and design intent is considered acceptable at this stage and the next stage of the process is to continue dialogue with the applicant and architects to agree the detail of measures to be incorporated within the development. A condition would ensure the development would provide a safe and secure environment for all users. The proposals are considered to be well designed and in accordance with the NPPF and Policy DC1 of the Local Plan 2018.

13) Archaeology: The site is not located within a locally defined Archaeological Priority Area. The Greater London Archaeological Advisory Service (GLAAS) support the conclusion that there is low potential for the site to contain archaeology remains and confirms that no further archaeological work or condition is required in this particular instance. The proposed development therefore accords with Policy HC1 of the London Plan 2021 and DC1 and DC8 of the Local Plan 2018.

14) Local Economy and Employment: The development would generate construction related full time equivalent (FTE) jobs over the build period and jobs once the development is complete and operational. The proposal would however provide only a limited number of employment opportunities on the site once operational due to the nature of the proposed uses. The employment and training initiatives secured through the S106 agreement would bring significant benefits to the local area while a local procurement initiative will be entered into by way of the legal agreement to provide support for businesses. Furthermore, contributions through the community use for borough residents would have a positive effect on the borough. The development is therefore in accordance with London Plan Policy E2 and Local Plan Policies E1 and E4.

15) Accessibility and Safety: 10% of the student accommodation rooms would be wheelchair accessible and include two blue badge car parking spaces and cycle storage spaces for adapted/larger cycles are provided on-site. The development would provide level access, and lifts to all levels and suitable circulation space. Conditions would ensure the proposal would provide ease of access for all persons, including those with mobility needs. Satisfactory provision is therefore made for users with mobility needs, in accordance with Policies D5 and D11 of the London Plan 2021; and Policy H06 of the Local Plan 2018. An Inclusive Accessibility Management Strategy is secured by way of condition.

16) An updated Fire Strategy has been provided in response to the requirement of a second staircase and evacuation lifts. The proposal will provide a high-quality environment for disabled and impaired members of the community and the commitments within the Access Statement are positive and deliverable by way of conditions. As such the proposal will comply with London Plan Policies E10, D5 and D12 Local Plan Policies DC1 and DC2 as well as Planning Guidance SPD Key Principles DA1, DA4, DA5, DA6, DA7, DA8, DA9, DA11, DA12 and DA13.

17) Objections: Whilst many issues have been raised by objectors to the scheme it is considered, for the reasons explained in the detailed analysis, that planning permission should be granted for the application subject to appropriate safeguards to ensure that necessary controls and mitigation measures are established. This decision is taken on the basis of the proposed controls, mitigation measures and delivery commitments contained in the draft conditions and Heads of Terms for the Section 106 Agreement set out in this committee report, which are considered to provide an adequate framework of control to ensure as far as reasonably practicable that the public benefits of the scheme will be realised in accordance with relevant planning policies whilst providing the mitigation measures and environmental improvements needed to address the potential impacts of the development.

18) Conditions: In line with the Town and Country Planning Act 1990 and the Town and Country Planning (Pre-commencement Conditions) Regulations 2018, officers have consulted the applicant on the pre-commencement conditions included in the agenda and the applicant has raised no objections.

19) Planning Obligations: Planning obligations to offset the impact of the development and to make the development acceptable in planning terms are secured. Contributions relating to the provision of economic development initiatives, including local training and employment opportunities and procurement, local infrastructure improvements, monitoring, public realm improvements and carbon offset payment are secured. The proposed development would therefore mitigate external impacts and would accord with Policy CF1 of the Local Plan 2018.

LOCAL GOVERNMENT ACT 2000 LIST OF BACKGROUND PAPERS

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

Application form received: 29 November 2022

Drawing Nos: See Condition 2

Policy documents:

National Planning Policy Framework (NPPF) 2021

The London Plan 2021

LBHF - Local Plan 2018

LBHF – Planning Guidance Supplementary Planning Document 2018

LIST OF CONSULTATION & NEIGHBOUR COMMENTS (ADDRESSES).

Consultation Comments:

Historic England	09.12.2022
Historic England (GLAAS)	14.12.2022
Thames Water – Development Control	21.12.2022 and 20.07.23
Metropolitan Police Service	23.12.2022 and 08.08.23
Design Out Crime Officer – Southwest Area	
Royal Borough of Kensington & Chelsea	27.01.2023
Greater London Authority (GLA)	30.01.2022
HSE – Planning Gateway One	09.01.2023 and 31.07.23
Transport for London (TfL)	07.02.2023

Neighbour Representations

Brickfields Area Residents	16.01.2023 and 23.01.2023
St Quintin and Woodlands Neighbourhood Forum & St Helens Residents Association	16.01.2023
13-44 Pankhurst House, W12	14.12.2022
23A Eynham Road, W12 0HA	08.12.2022, and 15.09.2023
14 Shinfield Street, W12 0HN	14.12.2022
23A Eynham Road, W12 0HA	15.01.2023
32A Eynham Road, W12 0HA	15.01.2023 and 11.09.2023
41 Eynham Road, W12 0HA	15.01.2023 and 15.09.2023
50A Eynham Road, W12 0HA	15.01.2023 and 12.09.2023
10A Eynham Road, W12 0HA	16.01.2023
27A Pavillion Terrace, Wood Lane, W12 0HT	16.01.2023
29 Pavillion Terrace, Wood Lane, W12 0HT	16.01.2023
3 Glenroy Street, W12 0HF	16.01.2023
38 Eynham Road, W12 0HA	16.01.2023
38 Eynham Road, W12 0HA	16.01.2023
38 Eynham Road, W12 0HA	16.01.2023
38 Eynham Road, W12 0HA	16.01.2023
38 Eynham Road, W12 0HA	16.01.2023
40A Eynham Road, W12 0HA	16.01.2023
56A Eynham Road, W12 0HA	16.01.2023
56A Eynham Road, W12 0HA	16.01.2023
60A Eynham Road, W12 0HA	16.01.2023
Flat 32, Pankhurst House, Du Cane Road W12 0UL	24.07.2023
24A Eynham Road, W12 0HA	11.09.2023
11 Nascot Street, W12 0HE	11.09.2023
52A Eynham Road, W12 0HA	12.09.2023
12 Shinfield Street, W12 0HN	12.09.2023
469 Latimer Road, W10 6RD	13.09.2023
278 Latimer Road London W10 6QW	13.09.2023
12 Snarsgate Street, North Kensington W10 6QP	13.09.2023
18A Eynham Road W12 0HA	15.09.2023
11 Nascot Street First floor flat, W12 0HE	15.09.2023
20 Harmood Street London NW1 8DJ	15.09.2023
22a Pavillion Terrace, Wood Lane W12 0HT	15.09.2023
62 Eynham Road, W12 0HB	15.09.2023

1.0 SITE DESCRIPTION AND SURROUNDINGS

The Site

- 1.1 The application site ('the site') referred to as "Plot A", is located within the north-west portion of the Imperial College London's - White City Campus North masterplan site. The campus lies to the north of the A40 Westway and at the edge of the borough's White City Regeneration Area (WCRA). The site forms part of Imperial's proposed wider White City campus, comprising two parts separated by the A40 Westway: White City North and South campuses. The site is located on the east side of Wood Lane and is bounded by Shinfield Street along the northern edge.
- 1.2 Plot A (shown on Figure 1 below) measures approximately 0.23 hectares in area. It forms part of the wider Imperial College White City North campus and remains the last plot of the masterplan to be constructed. The rectangular shaped site currently comprises a temporary surface level car park, lined by mature trees inside the site boundary on Wood Lane and Shinfield Street and a security cabin. Levels across the site vary slightly between 10.7m AOD and 9m AOD.

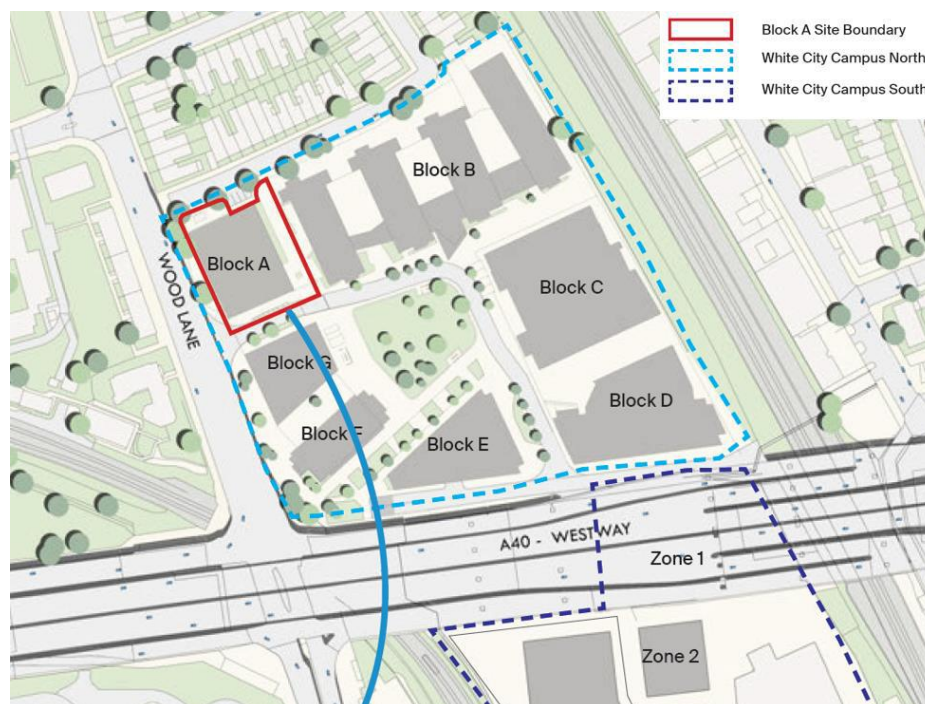


Figure 1 - White City North Campus & the application site outlined in red.

1.3 North Campus

The wider White City North Campus is approximately 2.27 hectares (5.60 acres) in size and broadly square in shape. Acquired by Imperial College London in September 2009, the White City North Campus has been developed out under two phases and is designed in the form of seven development plots, built around a central public square and connection routes. The campus comprises a mix of uses, including medical, life sciences, engineering and technology research/development uses, in buildings ranging

between 9-13 storeys, the ten storey GradPad student accommodation and a 35-storey residential tower.

- 1.4 The White City “North Campus” currently comprises the following six buildings:
- The Wood Lane Studios ‘Grad Pad’ buildings (Building B). Adjoins the application site to the east. Post-graduate student accommodation (606 postgraduate units and 9 residential units for key workers at Imperial College). The existing student accommodation is provided in the form of four connected finger blocks which comprise three storey residential elements adjacent to Shinfield Street to the north, stepping up from five and ten storeys towards the south.
 - The Molecular Science and Research Hub (Building C). A nine-storey building on the eastern part of the campus.
 - The Translation and Innovation Hub or ‘I-Hub’ (Building D). A 12-storey building in the south-east corner.
 - The Sir Michael Uren Biomedical Engineering Research Hub (Building E). A 13-storey building on the southern part of the campus.
 - Eighty-Eight Wood Lane (Building F). A 35-storey residential tower, on the south-west corner comprising 192 residential units.
 - The School of Public Health (Plot G) – Under Construction. Will provide a 10-storey building immediately to the south of the application site to accommodate offices, for Imperial College’s School of Public Health.

Surroundings

- 1.5 The surrounding townscape is of a mix of styles and form. The area to the north of the site and wider White City Campus North is residential in character. The site is bounded by two/three storey residential properties on Shinfield Street (Nos. 2-26 Shinfield Street and the side of No. 29/29a Pavilion Terrace which fronts Wood Lane). Beyond Shinfield Street are similar residential streets, including, Eynham Road and Nascot Street. Shinfield Street demarks the most northerly point of the White City Regeneration Area.
- 1.6 To the west on Wood Lane and outside the White City Regeneration Area is Cavill House, a four-storey, mixed-use building with retail units at ground floor level and residential flats to the upper floors. To the northwest of the site, is four storey residential building known as Nightingale House located on the corner of Wood Lane and Du Cane Road. Further northwest lies Hammersmith Hospital with its Imperial College research facilities incorporated into it, Linford Christie Stadium and the large expanse of Wormwood Scrubs. South beyond Cavell House is Browning House, a four-storey residential building and 227 Wood Lane, a low-rise office building the subject of a live planning application for the development of 60 affordable homes and 210 shared living units with heights of 7 to 18-storeys (LPA Ref: 2020/00300/FUL).
- 1.7 Directly to the east of Plot A is Wood Lane Studios GradPad blocks which form part of the wider White City Campus North site and comprises student accommodation. The West London Overground railway line and the administrative boundary with the Royal Borough of Kensington and Chelsea

(RBKC) lies beyond. Properties in RBKC are predominantly residential character and include a mix of two and three storey industrial units on Latimer Road. The area bounded by Highlever Road and Oxford Gardens is within in RBKC's Oxford Gardens Conservation Area. South of Plot A is the adjoining site at Plot G, where the School of Public Health is under construction, and forms part of the wider campus site.

- 1.8 The area in and adjacent to the White City Opportunity Area is undergoing significant regeneration and development. Land to the south of the A40 Westway is being brought forward by Imperial College in the form of White City Campus South. This site is subject to an outline permission for an employment-led mixed-use redevelopment to create a new research and innovation district, focussed on science, medicine, engineering and business, together with residential and hotel uses, with buildings ranging in height between 9 to 32-storeys. Meanwhile use buildings in the form of office and research and development uses currently occupy part of the site, subject to a temporary planning permission for 10 years. Further south, the White City Regeneration Area is formed by the residential-led developments on the White City Living and Centre House sites which are under construction together with the 2nd phase of the 'Gateway' scheme, a mixed-use employment led development, on the corner of Wood Lane and South Africa Road and Westfield and the second phase developments on the BBC TV Centre site.

Designations

- 1.9 The application site is located within the White City Opportunity Area (WCOA) as designated in the London Plan (2021) and the White City Regeneration Area (WCRA) in the H&F Local Plan (2018). The site is located within Local Plan Strategic Site Policy (WCRA1) - White City East, an area of land that extends northwards from north of Westfield and includes the BBC TV Centre and former Media Village site (now formed by part of the Gateway development) up to and including White City Campus North site. The Shinfield Street properties demark the most northerly point of the Regeneration / Opportunity Area.
- 1.10 The site does not fall within a conservation area or any of the buildings listed (statutory or local listings) nor in a designated area of archaeological importance. There are a number of heritage assets in the wider area including several conservation areas nearby. The closest conservation areas are the Old Oak and Wormholt Conservation Area to the west; Wood Lane Conservation Area to the south; and Oxford Gardens/St Quintin Conservation Area (in the Royal Borough of Kensington and Chelsea) to the east. Listed buildings in the area are the Burlington Danes School (Grade II) to the north and the BBC Television Centre (Grade II), located approximately 500 metres to the south. The site is not within any designated London View Management Framework view or key views as defined in the Local Plan.
- 1.11 The site falls within the Environment Agency's Flood Risk Zone 1 (low probability of flood risk) and an Air Quality Management Area (which covers the whole borough).

- 1.12 The site is situated near the Wormwood Scrubs Local Nature Reserve (LNR), located approximately 485 metres north-west of the site. There are trees on the site, but none are protected by Tree Preservation Orders (TPO's).

Transport

- 1.13 The site has a Public Transport Access Level (PTAL) ranging between 2 to 6a, on a scale of 0 to 6b, where 6b represents the highest level of access to the public transport network. Most of the campus falls within a PTAL range of 6, indicating an "Excellent" level of accessibility. A bus stop (southbound – Wood Lane) is located directly outside the site and serves four bus routes. Northbound services can be accessed across the road outside Browning House. A total of ten daily bus services operates along Wood Lane, near to the site.
- 1.14 White City London Underground station (Zone 2) is 6 minutes (500 metres) walk to the south of the site, served by the Central Line. Wood Lane London Underground station, served by the Circle and Hammersmith & City lines, is a further 200m to the south. The closest cycle hire docking station is located on Wood Lane, approximately 100 metres (3 minutes) walk to the south of the site. Shepherd's Bush rail station is the closest station to the site, approximately 22 minutes' walk from the site. The station is served by London Overground and Southern rail services to key destinations including Clapham Junction and Watford Junction.
- 1.15 Construction of the Wood Lane Cycleway was approved in January 2022. This encompasses improvements along Wood Lane between Du Cane Road and Shepherd's Bush Green. This route is a proposed extension to Cycleway 34. Enabling works will include public realm improvement works along Wood Lane.
- 1.16 Vehicular access is via Wood Lane. The main pedestrian access points are via segregated footpaths into the site on Wood Lane, Shinfield Street and via the underpass beneath the Westway to the south. There is a signalised pedestrian crossing located to the north of the site at the junction of Du Cane Road and underneath the Westway to the south. The (A40) Westway (an elevated dual carriageway at this location) runs east-west, located 50 metres to the south. Forms part of the Transport for London Road Network (TLRN). Wood Lane forms part of the Strategic Road Network (SRN). Controlled Parking Zones 'NN' which includes the residential street to the north operates Monday to Saturdays, between 09.00 – 17.00 and zone 'N' to the north-west (including Du Cane Road) operates Monday to Fridays, between 09.00 – 17.00.

2.0 PLANNING HISTORY

- 2.1 The proposed development is located within the White City Campus North Masterplan. The campus comprising a group of buildings already developed in two main phases over the last 12 years across the wider site. Plot A is the

last remaining undeveloped plot on the campus, comprising open land covered by a temporary car park hardstanding. Plot A (along with Plot G) has an existing full planning permission. The planning history for the North Campus is summarised below.

- 2.2 Phase 1 was granted planning permission in November 2010 (ref: 2010/02218/FUL) for 606 postgraduate units and 9 residential units for Imperial key workers (Grad Pad - Block B).
- 2.3 Phase 2 was granted planning permission in December 2012, under a 'hybrid' (part detailed/part outline) planning application (ref: 2011/04016/COMB). Permission was granted for 6 buildings ranging in height from 3 to 35 storeys, arranged around a public square, for a mixed-use development including residential, education, administration offices, a business and research hub, and community uses, as well as a hotel with supporting retail / café / restaurant facilities. The hotel use was subsequently replaced by the Sir Michael Uren Biomedical Engineering and Research Hub building.
- 2.4 The hybrid permission has been altered by way of several minor material amendments, namely ref: 2015/01328/VAR (granted in March 2016); ref: 2015/06109/VAR (granted in December 2016); and ref: 2018/01256/VAR (granted November 2020). The phase has come forward under a series of detailed and reserve matters applications which are summarised below. Detailed elements included Buildings C, D, and F. A subsequent amended application was submitted and approved in detail for Building E (Sir Michael Uren hub).
- 2.5 Building 'C' (Education Use) is 9 storeys in height (plus basement) and comprises approximately 23,000 sqm GEA, which was originally permitted for uses including office, research, education and computation space, coupled with a publicly accessible health centre, day care centre, café, restaurant and retail uses at ground floor level. Following approval of Section 73 "variation of condition" application (ref: 2015/06109/VAR) approved in 2016, Building C has been completed and is now occupied by Imperial College London's Department of Chemistry.
- 2.6 Building 'D' (New Business Incubator and Offices) is part 6, part 12 storeys in height and comprises approximately 22,500 sqm GEA of floorspace for a mixture of offices and 'incubator' business units. Imperial's technology transfer company, 'Thinkspace' runs the facility as the "I-Hub" and the activities span the breadth of Imperial's own areas of research. The I-Hub opened in 2017 and is occupied by a variety of new businesses.
- 2.7 Building 'E' (Biomedical Engineering Research Hub – Sir Michael Uren Foundation) is a 13-storey building comprises laboratory and office facilities for biomedical engineering research space for engineers, clinicians, and scientists. The laboratory and office space building replaced a previous consent hotel use under permission 2015/01329/FUL.

2.8 Building 'F' (Residential building with ground floor retail /café / restaurant uses). 35 storeys in height and 192 residential units. 59 units (31%) are affordable rent units for Imperial College staff. Building F is occupied and known as "Eighty-Eight Wood Lane".

Plots A & G

2.9 Outline permission originally granted for Plot A (along with Plot G) under the Masterplan for the following development:

- Building A – Academic offices and support facilities; Part 3/ Part 5 storey building with a maximum GEA of 5,900sqm.
- Building G – Academic offices, retail and café/bar; 7 storeys building with a maximum GEA of 6,500sqm.

2.10 The two plots frame the only access road into the northern campus. The outline planning permission was supported by parameter plans and a design guidelines document. Plots A and G were the only two buildings reserved, to be approved as part of a future Reserved Matters Application.

2.11 A Reserved Matters application (ref: 2017/04463/RES) was submitted in November 2017, with respect to the scale and appearance of the proposed buildings for Plots A and G, to provide academic offices, education and research facilities (entirely consistent with the outline permission). This application was approved on 9 May 2018. However, following a review of the potential occupiers on these plots and the recognition of the potential to house the School of Public Health on the campus, the Applicant opted to progress a new development for both Buildings A & G that would breach the parameters and design codes of the original outline permission.

2.12 Having identified the scope to accommodate the School of Public Health on the campus, a separate 'drop in' detailed planning application was submitted alongside a refinement of the wider landscape masterplan strategy which incorporates the two sites. The proposal looked to provide improved accessibility into and through the wider Imperial College campus and improve connectivity to the former Dairy Crest site (to the South of The Westway) following its acquisition by the Applicant to deliver Imperial's future South Campus in White City.

2.13 A detailed planning permission (Ref: 2018/01234/FUL) was granted on 3 November 2020 for an alternative scheme for Plots A and G, for research & development, offices and Community Research Space, together with commercial floorspace at ground floor within retail uses and other ancillary uses across both plots. This detailed permission superseded the original reserved matters approval (ref: 2017/04463/RES) for Buildings A and G.

2.14 Plot A was approved in the form of a part 3, part 5, part 7 storey building, together with a single level of basement, comprising a total of 9,224 sqm of floorspace (GEA), including up to 623 sqm (GIA) of retail uses. A 10 storey (plus basement) building was approved on Plot G, to accommodate the

School of Public Health. The permission includes associated alterations to the landscaping within the red-line area for the application.

- 2.15 Alongside the full planning permission (ref: 2018/01234/FUL) for Plot A and G, a further variation to the outline planning permission was also granted permission (ref: 2018/01256/VAR). Both applications are subject to an updated S106 agreement signed on 3 November 2020.
- 2.16 As referred to above, Phase 2 has been modified through various amendment proposals for the White City Campus North Masterplan and included six "Section 73" planning applications, the last decision issued in November 2020 for ref: 2018/01256/VAR sits alongside ref: 2018/01234/FUL for Plot A and G. The S73 applications are summarised below:
- 2nd August 2013 - Ref: 2013/02980/VAR: This permission secured amendments to the wording of certain conditions to enable the development to be delivered in phases rather than its entirety.
 - 4th November 2013 - Ref: 2013/02525/VAR: The approved amendments related to Buildings 'C' and 'D' and altered the floorspace and design of the two buildings. The amendments were required to improve the appearance and efficiency of the buildings, and closely align the space to meet the requirements of the end user.
 - 4th April 2014 - Ref: 2013/05635/VAR: A total of 7 amendments were granted under this permission and mostly related to the external design of Building C, borne out of a requirement to allow for flexibility over the lifetime of the building and to improve the building's efficiency and functionality.
 - 15th March 2016 - Ref: 2015/01328/VAR: Enable the Biomedical Engineering Research Hub to replace the original hotel use for Building E in the Masterplan permission. Several details were amended to enable the building to sit within the revised Masterplan so that both were entirely consistent with one another. Changes included alterations to the landscaping and public realm, internal vehicular circulation road and the layout of the shared central car park basement levels.
 - 2nd December 2016 - Ref: 2015/06109/VAR: To facilitate the Department of Chemistry occupying Building C, a total of 7 amendments were granted permission together with a deed of variation to the Section 106 agreement. The changes included an amendment to the Use Class/Description of development, external appearance, increase to the number of flues and the redesign of the central square basement car park.
 - 3 November 2020 - Alongside the grant of full planning permission (ref: 2018/01234/FUL) in respect of Buildings A and G themselves, a further variation to the outline planning permission (Ref: 2018/01256/VAR) was secured to allow for reconfiguration of access junction head, removal of central square basement car park, amendments to at grade vehicle and cycle parking facilities and associated changes to the public realm and landscaping to accommodate the revised footprints of buildings A and G.
- 2.17 In addition, there have been multiple applications seeking approval of details reserved by conditions to enable the commencement of the construction and

occupation on site in relation to Building's 'C', 'D', 'E' 'F' and 'G', as well as several Section 96a Non-Material Amendments approved. A temporary planning permission (ref: 2016/03129/FUL) was granted on 16 December 2016 for "temporary car parking for 27 standard spaces, 2 disabled and 6 motorcycle bays; erection of a security cabin with associated hard and soft landscaping, a temporary post and rail fence and lighting bollards".

3.0 CURRENT APPLICATION

- 3.1 The proposal seeks full (detailed) planning permission for an alternative development on Plot A. The development proposes the erection of a standalone building in the form of a part 3 / part 6 / part 9 and rising to 12 storey building, comprising 8,037 sqm GIA (8,713 sqm GEA) floorspace. Plot A immediately adjoins the Wood Lane Studios Grad Pad block. This corner site faces onto Wood Lane and Shinfield Street. The proposal would deliver 216 purpose-built, en-suite rooms of student accommodation use (Class Sui Generis), together with ancillary facilities, including a campus security and facility management space, laundry and internal cycle parking on the ground level, alongside a ground floor commercial space (Class E) fronting Wood Lane. This would be included together with ancillary plant, servicing, blue badge and visitor cycle parking, the creation of a public realm and wider landscaping improvements.
- 3.2 The current proposal seeks to bring forward an amended scheme to the extant/consented permission, granted in November 2020 (ref: 2018/01234/FUL) for Plots A & G. The proposal would replace the consented Part 3 / Part 5 / Part 7 storey building on Plot A granted for "academic offices and support facilities". In support of the proposal, the Applicant states the provision of additional student accommodation on the campus would provide the opportunity to further develop the postgraduate community, as well as consolidate a clear transition between the established residential community to the north of Shinfield Street and the academic activities within the rest of campus.
- 3.3 Plot G, located on the adjoining plot, is being built out in accordance with the extant 2020 permission. The building is set to be completed for the School of Public Health by the end of 2023.
- 3.4 A key element to the design of Plot A is the integration of the plot within the wider consented landscape masterplan for the north campus. The landscaping proposals outside Plot A are set to be completed in accordance with the details granted under the permission (Ref: 2018/01256/VAR), except for the retention of two existing trees which were previously approved to be removed and replaced. No changes are proposed to the rest of the approved landscape masterplan in respect of land outside of the red-line area. Similarly Plot G is still coming forward in accordance with the 2020 detailed permission.
- 3.5 The changes to "Plot A" amount to a similar footprint to extant 2020 permission. The layout approach broadly mirrors the approach taken in the previous scheme in terms of building lines. The ground floor floorplate is set

back slightly behind columns to the Wood Lane elevation, with a more significant set-back to the south, due to the design of a colonnade to this elevation. The existing mature trees fronting Wood Lane and Shinfield Street would be removed, with new tree planting and public realm improvements proposed along these routes. Two trees (an Ash and a Hornbeam), fronting Shinfield Street would be retained as part of the latest proposals. The approach to remove the existing trees was permitted under the masterplan approval and the more recent 2020 permission. The maximum height of the proposed building would be taller and now be circa 41 metres (previously approved height of the building was circa 30 metres).

Details of the Proposed Development

Floor Layouts

- 3.6 A single main lobby entrance is proposed serving the student accommodation. The main student accommodation entrance would be in the southeast corner of the building, fronting the central square of the campus. The main east/west pedestrian route would be via the entrance off Wood Lane, alongside the south elevation of the building, widened through the introduction of a two-storey colonnade at ground floor level. A security office would be integrated on the south elevation to monitor the vehicle entry gates into the site. A north-south route adjacent to the east elevation adjacent to the Grad Pad blocks through the campus from Shinfield Street would be retained as a step free pedestrian and cycle access route.
- 3.7 The GIA at ground level is 1,096 sqm comprising 666 sqm (ancillary student accommodation) and 430 sqm flexible commercial space. The commercial space would front Wood Lane with return frontages on Shinfield Street (north elevation) and the main campus entrance (south elevation). The floor to ceiling height at ground floor level is proposed to be broadly in line with the ground floor level to the School of Public Health use in Plot G. The commercial space is designed to be a column free layout, with a 4.5m floor to ceiling height to enable flexibility and installation of MEP service requirements. The space would be adaptable to meet future market conditions and requirements. Any subdivision and the final use of the space would fall in Class E and would be determined at a later stage. A delivery and service area to support the student accommodation and commercial functions of the building is proposed to the rear (east elevation) of the building, between Plot A and the Grad Pad buildings. The east elevation would include access to cycle storage, waste and recycling areas, service and plant rooms alongside a dedicated security office on the south elevation to monitor incoming and outgoing vehicle traffic to the campus.



Figure 2: Proposed ground floor layout

- 3.8 The first-floor layout would provide 25 student accommodation studios, fronting the three primary elevations (north/west or south elevations). The proposed rooms are designed to reflect the exiting arrangements in the adjacent Grad Pad block and to meet different requirements of post graduate students. A central communal/dining amenity space (284 sqm), plus a games room and laundry facilities is proposed on the first-floor level. Windows on the east elevation, serving the central communal / amenity space would provide direct surveillance to the pedestrian and cycle route to the rear of the site and adjacent to the existing Grad Pad building.



Figure 3: First floor layout

3.9 The rest of the upper floors (Level 02 above) would provide a further 191 students' studios, designed as a range of standard, premium and accessible rooms. On Level 02 the studios would be arranged around an external green roof, in the form of a courtyard space, set on the east side of the building, and with the massing of the building extending upwards around this open courtyard.

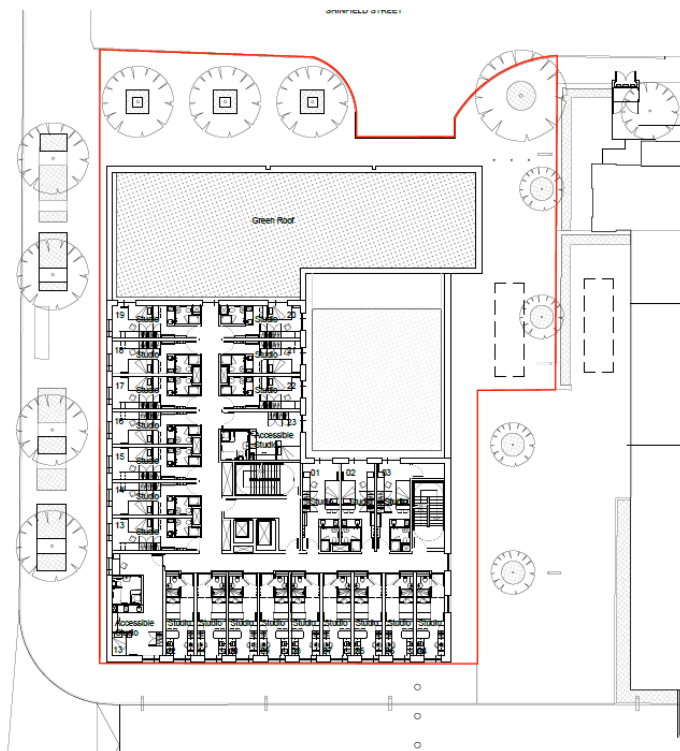


Figure 4: Upper Floor Layouts – Levels 03 - 05

- 3.10 The height of the proposed development would range from 3 to 12-storeys. The massing of the proposed building is broadly in line with the overarching massing principles established in the previous planning permission, albeit the tallest elements exceed that of the permitted office building Plot A. The building is proposed to gradually step down towards Shinfield Street to the north in three stages and would be three storeys in height at its northern end, fronting Shinfield Street, rising towards the south, to 4, 6, 9 and then 12 storeys. The transition in scale from a 3 storey development along the northern edge of the masterplan to the 10+ storey building heights around the central square and onto the southern edge of the campus following the design principles of the GradPad blocks. The tallest element of the building at 12 storeys, would be located at the southern end adjacent to the public square. The maximum height would align and match the adjacent School of Public Health building (Plot G), to create a consistent profile and enclosure of the Wood Lane frontage and the public square to the rear.
- 3.11 The building would extend to overall parapet height of 39.55m. A lift overrun, and rooftop plant would extend to a maximum height of 1.93m above the parapet height. Maximum height (41.5 metres). The number of student rooms proposed per floor would vary depending on the step of the building. The floor plates of the building to the south are reduced further for the three top floors (levels 09 - 11). Alongside the proposed courtyard roof space at second floor level, green roofs would be incorporated on each of the three stepped roofs, to enhance outlook and the site's biodiversity. A small outdoor terrace area (180 sqm) for student use is proposed on Level 09, fronting Wood Lane and return north frontage, facing Shinfield Street. The top roof level of the building (Level 12) is designed primarily to house MEP (mechanical, electrical and plumbing) plant equipment.

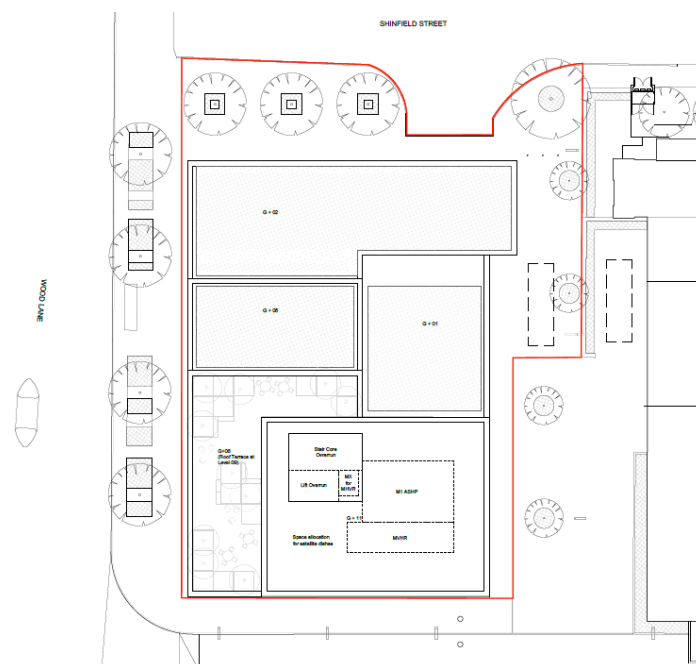


Figure 5: Roof Layout

3.12 The student accommodation would provide the option of a range of studio layouts. The general layout and arrangements are based on the Grad Pad principles. The size of the studios would range between 17 and 27 sqm. The proposed **216 rooms** would provide a mix of 92 x Essential Studio rooms (17 m²); 95 x Standard Studio rooms (ranging between 18 m² – 25 m²) and 8 x Premium Studio rooms (27 m²). 10% (21 rooms) are designed as larger Wheelchair Accessible Studios, ranging between 27 m² - 34 m². The wheelchair accessible studios would include enlarged bathrooms with wheelchair accessible showers and manoeuvring zones on access routes around furniture items. All the student rooms are designed as self-contained studios. The rooms would have en-suite bathroom as well as a small kitchenette, bedspace, storage and study / seating area. Dual aspect units are proposed on the building corners. The floor-to-floor height of a student accommodation floor is set to 2,925mm, to achieve a minimum clear floor to ceiling height within the studios of 2,400mm. Imperial College London would be responsible for the managing and operating the accommodation directly and allocating rooms to its students. The table below summarises the breakdown on the number of rooms and the proposed floorspace per type of studio.

Studio type	Area	Number of units
Essential Studio	17 m ²	92
Standard Studio	18 m ² - 25 m ²	95
Premium Studio	27 m ²	8
Wheelchair Accessible Studio	27 m ² - 34 m ²	21
Total		216

3.13 Two typical room layouts are illustrated in the floorplans below.

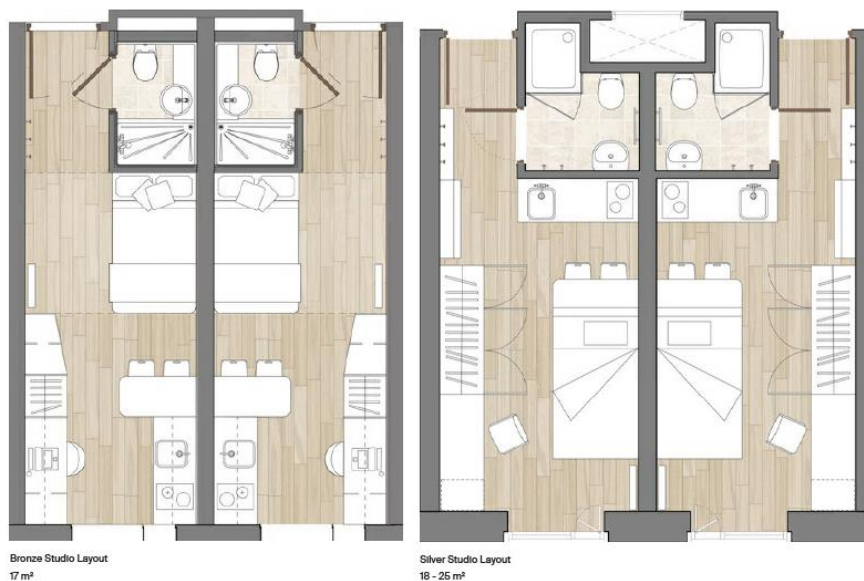


Figure 6: Typical Studio Layouts

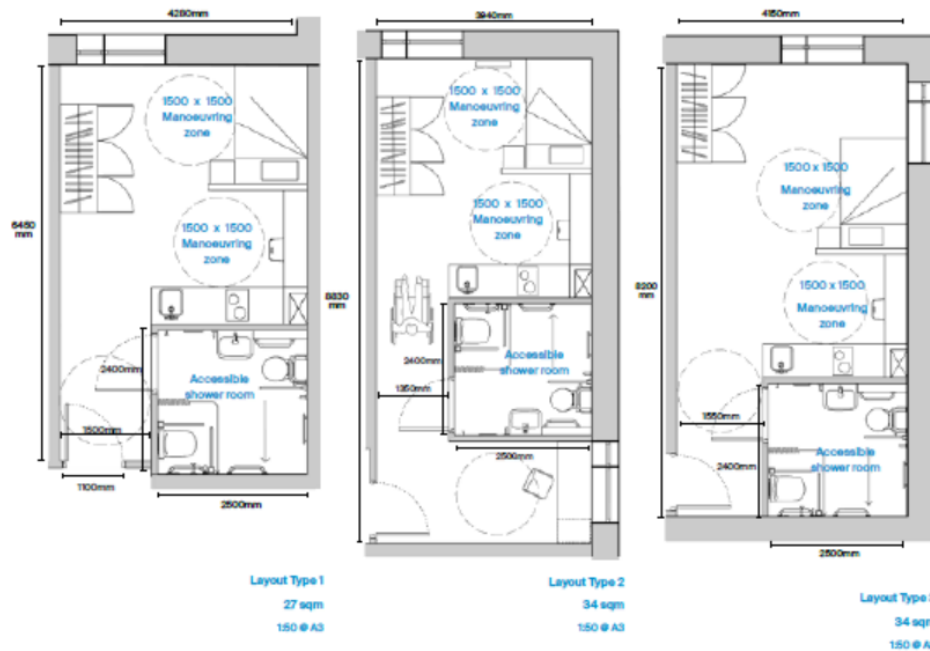


Figure 7: Wheelchair Accessible Layout Types

- 3.14 Access to each floor of the building is provided by two lifts (an 8 person and a 14-person lift), both located in the main core which can operate as firefighting and evacuation lifts. At least two staircases are provided throughout the building. Level access is provided to the communal space at Level 01 and the external terrace at Level 09. The wheelchair adaptable rooms are located where possible close to the main circulation core to provide a shorter travel distance.

Architectural Treatment

- 3.15 The design and massing arrangement is based upon providing a transition in scale from a low-rise 2/3 storey residential scale along the northern edge of the site, fronting Shinfield Street to larger scale, 10+ storey buildings located around the central square and matching the scale of adjacent the Grad Pad building and to the southern edges of the campus. Vertical emphasis is proposed to the elevations along Shinfield Street to reflect the lower scale, domestic residential character of the terraced housing along the northern site boundary. The step up in scale along Shinfield Street established mirroring the approach of the existing GradPad building would complete the remaining corner block defined through Plot A, fronting onto Wood Lane. The main body of the building would be wrapped into a consistent fenestration grid that reflects the use of the building and expresses the individual rooms within the building. The roof terrace at Level 09 is marked by a raised balustrade with metal infill uprights that retain the primary facade grid and add transparency at the top of the building. The top of the building and elements of the eastern elevation refer to the wider campus development, with a distinctly expressed crown to the top to conceal roof top plant equipment in closer context street view. Larger areas of secondary cladding material and glazed areas express communal zones along the eastern elevation to reflect the larger scale of the campus context buildings.

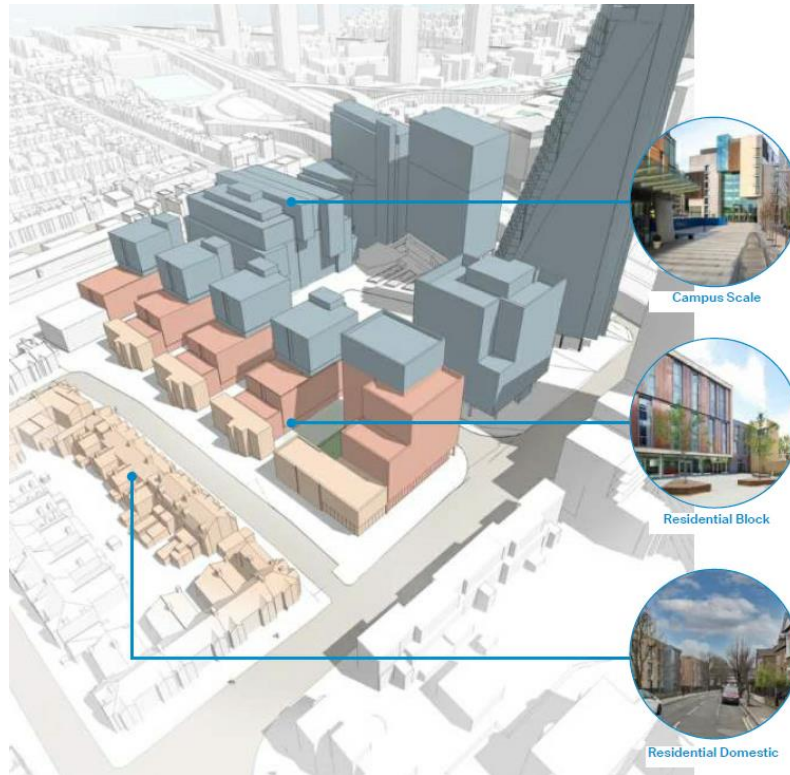


Figure 8: Massing Arrangements

- 3.16 The elevations would be formed by a precast concrete panel frame structure, with use of copper-coloured aluminium cladding. Within this grid structure, larger “double bays” with extensive glazing are proposed at ground floor level and at first floor level to the south elevation and most of the west elevation. Single bays inset with buff-coloured and copper-coloured aluminium cladding and “domestic scale” windows (with copper-coloured aluminium spandrel panels) are proposed to the remainder of the first floor and all floors above.



Figure 9: Wood Lane Elevation

Public Realm

- 3.17 The consented masterplan public realm space expresses a spatial hierarchy of site entrances, central square, pedestrian connections, main entrances with cafe terraces and servicing zones. The scheme has been designed so that all landscape works outside of the application red line are still able to be delivered as per the current planning permission ref: 2018/01234/FUL. No amendments are therefore required to the existing planning permissions (ref:

2018/01256/VAR or ref: 2020/18/01234/FUL) to accommodate the proposals. All materials, planting and street furniture would match the wider masterplan public realm strategy. Within the site, two existing mature trees would be retained in the latest proposals. Both trees are located along Shinfield Street and are Category A trees.



Figure 10: Public Realm Masterplan

Access and Servicing

- 3.18 The site is designed as a car free development, except for the inclusion of two Blue Badge parking spaces adjacent to Plot A site and form part of total of 22 blue badge car parking spaces delivered across the masterplan. The accessible parking distributed across the campus provides accessible parking near each building entrance and with direct level access. The vehicle access point is located on Wood Lane and site access would be controlled through security rated rising bollards set at over 24m from Wood Lane avoiding queues. The main vehicle movements pass around the central square and into one of the mews spaces or into the servicing bays of buildings D and E. The public realm is predominantly pedestrian, with vehicles expected to transit through at low speeds. An Imperial campus bus and taxi drop-off / pick-up point would locate adjacent to the pavilion with ample turning space provided for a large coach. Taxis will also be able to drop-off and turn at the northern entrance to Building E. Loading bays are provided in the various mews spaces to facilitate access to substations in plot A and B, chemical stores to the north of Building C, and deliveries and refuse collections to all buildings generally. Motorcycle parking spaces are provided in the eastern Mews space and the east-west pedestrian link.



Figure 11: Site Wide Access & Parking Strategy

- 3.19 Cycle stands are provided throughout the public realm for short stay use and within the buildings for extended stay use. A total number of 75 stands (150 spaces) are provided as part of the consented scheme, distributed widely to provide short stay spaces close to building entrances. The amended scheme increases the number by 4 stands (8 spaces) because of the requirements of Plot G. These additional stands are also located adjacent to the eastern facade of Plot G. Long stay, secure and sheltered cycle parking is provided for each building, including Plot A. Additional cycle parking is also provided in a new cycle hub beneath the Westway (for up to 1,136 bicycles) which will serve both the north and south campus. Space has also been identified on Wood Lane to provide a TfL/Santander Cycle docking station for up to 36 bikes (32m²).
- 3.20 Residential waste storage would be provided at ground floor. On the collection day, on-site facilities team would transfer the refuse to and from the external staging area on the far side of the loading bay in advance of the refuse vehicle arriving. Residents would be responsible for transferring refuse and recycling waste from their units to the refuse store. A separate bin store for commercial waste from the Class E use is provided at ground level. The Imperial Estates Team will arrange for a private contractor to collect commercial waste on either a daily basis or every two days.
- 3.21 The proposed external lighting and installation would be designed to provide sufficient light for safe access onto and around the site. The public access route, the pedestrian walkways, vehicle pathways and the car park would be lit. The lighting scheme would be designed to be as energy efficient as

possible, using LEDs and designed to minimise light spill. Fittings would be switched on at dusk and off at dawn to reduce light pollution and energy waste.

- 3.22 A secured planning obligation (for application ref: 2018/01234/FUL) includes a contribution for the construction of the underpass beneath the West London Railway Line, to provide pedestrian and cycle link between the Imperial site and public highway at Latimer Road at Royal Borough of Kensington and Chelsea. At this stage, discussions are ongoing between relevant stakeholders for the delivery of the underpass.

Energy Provision

- 3.23 The energy strategy for the proposed development will minimise energy use and CO2 emissions through the incorporation of an efficient shell, lighting, ventilation, and an air source heat pump system to maximise opportunities for heat recovery and reuse. Although windows are designed to be openable, the windows of certain façades will be closed due to acoustic constraints on site. Therefore, both a passive solution and a mechanical solution will be provided.

Construction Works

- 3.24 Construction works are estimated to take approximately 18 months (1.5 years) to complete including enabling and fitting out works. The construction of the proposed building would be in a single phase.
- 3.25 A site-specific Construction Traffic Management Plan (CTMP) is submitted with the application. Subject to the grant of full planning permission and once the Principal Contractor has been appointed, the CTMP and additionally CLP (Construction Logistics Plan) would be further developed to include details of the proposed methodologies, programme, method statements and detailed mitigation measures, forming a full CTMP and CLP. The contents of the CTMP and CLP would at this stage be secured by planning conditions.

Environmental Impact Assessment (EIA)

- 3.26 A screening opinion was issued 12 September 2022 (ref: 2022/01482/SCREIA), confirming the site is not located within a sensitive area, as defined in Regulation 2 (a)-(g) of the 2017 EIA Regulations. In terms of the Schedule 2, Category 10 (b) 'Urban Development Projects' threshold, there are no residential units proposed. Student accommodation falls within the 'Sui Generis' use class and as such the proposed development cannot be viewed as residential development. The total area of the proposed development site is 0.23 ha. The development therefore falls below all relevant criteria in category 10 (b), concluding that an EIA (Environmental Statement) would not be required.

Amendments

- 3.27 Amendments have been received in response to the requirements of the Health and Safety Executive (HSE) and comments by the Mayor of London, in response to the HM Government Building Regulations Advisory Committee (BRAC). BRAC has published correspondence regarding the provision of a single staircase in tall residential buildings (over 18m). In the original scheme,

Levels 3 to 9 of the proposal were served by a single staircase which constitutes the only escape and firefighting staircase. HSE advised this was not appropriate. A second staircase has been designed into the internal layout of the proposed build, to comply with the Building Regulations 2010 (as amended) and policies D5 and D12 of the London Plan. The amendments have been designed into the proposed envelope of the proposal without the need to increase the height or massing of the building. The description of the development has not changed as the result of revisions to the internal layout and minor alterations to the façade of the building.

3.28 The proposed amendments are summarised as below:

- Changes to the internal layout of the proposed building following the introduction of a second stair core to serve all floors of the proposal for enhanced fire safety requirements.
- New studio type to provide a wider range of student studio room options. The smallest studios would range from 17 sqm and between 18 sqm to 25sqm (compared to initially proposed studio rooms of 18sqm to 21sqm). Eight premium rooms retained, and 21 accessible rooms will be provided.
- Change in the number of bedrooms from 212 to 216.
- A reconfiguration and reduction of the communal space by 86 sqm (proposed 432 sqm in total) due to the introduction of the second staircase. An amenity space ratio of 2 sqm per bedroom would still be retained.
- Alterations to north, south and east elevational treatment to reflect the amendments to the internal layout of the building.

Supporting Information

3.29 The following supporting documents were originally submitted with the application:

- Design and Access Statement (“DAS”) dated 23 November 2022 prepared by Carey Jones Chapman Tolcher (CJCT);
- Planning Statement (Including Tall Building Assessment and draft S106 Head of Terms) dated November 2022 prepared by JLL;
- Townscape, Visual and Heritage Impact Report dated November 2022 prepared by The Townscape Consultancy;
- Daylight, Sunlight and Overshadowing Report dated 27 November 2022 prepared by OSM Chartered Surveyors;
- Daylight, Sunlight and Overshadowing - Non-Technical Summary dated 27 November 2022 prepared by OSM Chartered Surveyors;
- Air Quality Report Rev 2 dated 4 November 2022 prepared by Hoare Lea;
- Sustainability Statement Rev 02 dated 10 November 2022, prepared by Hoare Lea;
- Sustainability - Energy Strategy Rev 03 dated 10 November 2022 prepared by Hoare Lea;
- Sustainability - Assessment of Overheating Risk Rev 03 dated 6 October 2022 prepared by Hoare Lea (part of Energy Strategy);

- Sustainability – Whole Life Carbon Assessment Rev 03 dated 10 November 2022 prepared by Hoare Lea;
- Acoustics - Environmental Noise Survey Rev 03 dated 4 November 2022 prepared by Hoare Lea;
- Wind Microclimate Report dated October 2022 prepared by Imperial College Developments Ltd;
- Developers Method Statement Rev P02 dated 24 October 2022 prepared by Curtins;
- Fire Statement and Fire Gateway One Form prepared by Hoare Lea;
- Statement of Community Engagement dated November 2022, prepared by Camargue;
- Student Accommodation Management Plan dated August 2022 prepared by Steer;
- Flood Risk Assessment & Drainage Strategy Rev P04 dated 8 November 2022 prepared by Curtins;
- Transport Assessment dated September 2022 prepared by Steer;
- Framework Travel Plan dated September 2022 prepared by Steer;
- Outline Delivery and Servicing Plan dated September 2022 prepared by Steer;
- Outline Construction Traffic Management Plan dated September 2022 prepared by Steer.

3.30 The following documents have been submitted as part of revised proposal:

- Plot A - Transport Addendum prepared by Steer Group dated June 2023;
- Fire Engineering - Stage 2 report - Revision 02 – 26 May 2023 prepared by Hoare Lea;
- Fire Safety Statement for Planning prepared by Hoare Lea;
- Fire Statement Form prepared by Hoare Lea;
- Daylight, Sunlight and Overshadowing Report prepared by OSM Chartered Surveyors dated 19 June 2023;
- Daylight, Sunlight and Overshadowing - Non-Technical Summary prepared by OSM Chartered Surveyors dated 19 June 2023;
- Sustainability - Energy and Sustainability Reports prepared by Hoare Lea - Revision 01 – dated 26 May 2023;
- Revised drawings and Design and Access Statement Addendum Rev P03 dated 13 July 2023 prepared by CJCT.

4.0 PUBLICITY AND CONSULTATION

Referral to the Mayor of London

- 4.1 Under the terms of the Town & Country Planning (Mayor of London) Order 2008, the Greater London Authority (GLA) has been notified. The proposed development comprises the erection of a building of more than 30 metres high outside the City of London. Category 1C(c) of the 2008 Order.
- 4.2 The Mayor of London formally considered the original proposal on 30 January 2023 and issued a Stage 1 report. A summary is set out in paragraph 4.32-4.33 this report.

- 4.3 Should committee resolve to grant planning permission the application would need to be referred to the Mayor of London again (Stage 2) prior to the issue of any decision notice. The mayor has a period of 14 days from the date of notification to consider the council's resolution before issuing a decision as to the call-in of the application for the mayor to act as the local planning authority, or to allow the application to proceed.

Pre-Application Public Engagement

- 4.4 In accordance with the National Planning Policy Framework (NPPF), the Applicant undertook a detailed programme of pre-application engagement with the Council's Planning, Urban Design Officers, and technical officers. Pre-application discussions were held between September 2021 and October 2022.
- 4.5 The Applicant has submitted a Statement of Community Engagement (SOCE) which sets out the programme of engagement undertaken with local stakeholders, local groups, and residents between the pre-application period and submission of the proposal. This includes details of the pre-application meetings held with officers at H&F and GLA/TfL (Transport for London). This has allowed the applicant to consider the views of Council, GLA, TfL, key shareholders and the local community when developing the final plans.
- 4.6 The Applicant engaged with residents' groups and neighbours through a series of consultation events. A consultation process has been undertaken in accordance with the adopted Statement of Community Involvement for the borough, as well as being in line with principles of the Localism Act and the National Planning Policy Framework.
- 4.7 The Statement of Community Involvement submitted with the application summarises the pre-application engagement undertaken by the Applicant in 2022. Imperial undertook publicity to promote the consultation and invite the community to participate at both events held. Invitation letters were sent out to those who were most likely to be affected by the proposals – including residential and commercial properties close to the site, residents' associations and community groups. Imperial wrote to its campus teams to promote the consultation and displayed posters at key locations across White City Campus North. Imperial also wrote to stakeholders to let them know about the plans and offer a briefing.
- 4.8 The first consultation drop-in events took place in the Molecular Sciences Research Hub on 19 July and at Brickfields Hall on 20 July 2022. Provided the community an opportunity to see the proposals at this stage, speak to members of the project team and provide feedback.
- 4.9 In total approximately 24 people attended the first round of consultation events. Seven feedback forms were completed. Along with those submitted at the event, a further 12 feedback forms were submitted online. The feedback period ran until 9 August 2022 (three weeks in total).

- 4.10 A second round of consultation took place in October and November 2022 following requests from the local community and feedback from H&F officers. Publicity for this event was issued in w/c 3 October 2022, with digital material and the feedback forms available between Monday 10 October 2022 and Wednesday 2 November 2022 (three weeks in total). A drop-in event was held at Brickfields Hall on Tuesday 18 October 2022 (4-8 pm).
- 4.11 A total of 27 people attended this consultation event. 11 feedback forms were completed at the event. A further five feedback forms were submitted online, and one was submitted by post.
- 4.12 Across the events and written feedback, the majority of comments received related to matters concerning the design, height and massing of the proposed building, type of use proposed at the ground floor, trees and landscaping on Plot A, operational concerns (lighting, noise, servicing, construction issues), commitments to delivering a public open space (central square), plans for “underpass” and east-west connection between H&F and RBKC and the wider offers to the local community (more commercial and community space that public can visit and benefit from).
- 4.13 Representatives from local groups – including the Du Cane Residents’ Association, and the St. Quintin and Woodlands Neighbourhood Forum and St Helen’s Residents’ Association attended. The following feedback was given to the representatives: The design and height of the building should be considerate to the surrounding, concern raised about “studentification” of the area and need for more green space, delivering of wider masterplan, public space and pedestrian/cycling routes through the site, safety of bus stop on Wood Lane Imperial’s engagement with local schools and Imperial is considered overall a positive neighbourhood presence.

Design Review Panel

- 4.14 A Design Review Panel (DRP) was held 2 August 2022 at the pre-application stage. In summary the DRP supported the general principles of the development. The panel suggested that both the scale/massing and architectural treatment of the development would benefit from additional review to ensure that proposals retained a degree of compatibility with adjacent developments, namely the Gradpad buildings and the School of Public Health, (currently under construction). Further amendments to the scheme were introduced post the DRP.

Disability Forum Planning Group

- 4.15 Detailed proposals were presented to the Council’s Disability Forum Planning Group (‘DFPG’) at the pre-application stage on 21 September 2022. In response the DFPG suggested that the design team liaise with Grad Pad and Imperial’s Disability Advisory Service Medical Wellbeing and Disability team to better understand what design approach was successful on other student accommodation projects.

GLA

- 4.16 A pre-application meeting was held by the Applicant on 21 July 2022 with GLA/TfL and H&F officers. The GLA provided comments. In summary the GLA confirmed they were supportive of the proposal and provision of a student accommodation-led mixed-use development, subject to addressing issues raised in relation to urban design, urban greening and trees, transport, energy and climate change, air quality and noise.

Application Stage

- 4.17 The planning application has been the subject of two separate rounds of formal publicity and consultation by the Council (as the Local Planning Authority), in accordance with statutory requirements.
- 4.18 The application has been advertised on the following basis:

- The scheme comprises a Major Development.

Residents and Amenity Groups

First Public Consultation (December 2022 – January 2023)

- 4.19 The application was publicised by way of site notices posted around the site, a press advert (published 14 December 2022) and 1400+ neighbour letters sent on 7 December 2022 to individual properties.
- 4.20 The following comments were received:
- 19 objections, including 15 from Eynham Road (residential street north of the site) including 5 representations from one resident.
 - Representations received from two Resident/Amenity Groups: Brickfields Area Residents Association and the St Quintin and Woodlands Neighbourhood Forum and St Helens Residents Association.
 - 1 representation in support.
- 4.21 The objections/support comments along with consultee/resident association representations are summarised in paragraphs 4.26 – 4.29 below.

Second Public Consultation (July 2023 – September 2023)

- 4.22 The application was revised in July 2023. Amendments included the introduction of a second staircase, revisions to the internal layout, an increase of studio units from 212 to 216 rooms and minor façade alterations to the east, west and south elevations.
- 4.23 Notification letters (dated 21 July 2023) sent to all residents/amenity groups who previously commented on the previous proposals between December 2022 – January 2023 and all the neighbours in Shinfield Street, Cavill House Wood Lane, together with site notices posted around the site.
- 4.24 The following comments have been received:
- 17 objections - 8 objections from Eynham Road (4 from addresses in first round), 2 from Nascot Street, 1 from Pavillion Terrace and 1 from Shinfield

Street opposite the site, 1 from Pankurst House - Du Cane Road and 2 from residents in RBKC.

- No further representations from the amenity/resident groups.

4.25 The contents of these representations are summarised in paragraphs 4.30 below.

Objections from Individual Residents (First Round)

4.26 19 objections received. The objections are summarised as follows:

- Overdevelopment: Plot A proposal will increase the density on the campus further without the provision of necessary infrastructure and facilities for the residents.
- Height and massing: The proposal should revert to a 4 to 5 storeys and less density.
- Public square reduced in size, have less greenery and would not receive sufficient light because of the proposed height of the building.
- The square will most likely turn into a roundabout for deliveries and taxis.
- Loss of daylight/sunlight to properties on Shinfield Street.
- Create a dangerous wind tunnel effect.
- Increase noise and disturbance from occupants and use roof terrace on the 9th floor.
- Adverse impact from air conditioning.
- Increase traffic congestion and poor air quality.
- Incongruous 12 storey building next to 2-3 storey houses.
- Objections made by residents during consultation events ignored.
- Proposed cycling/pedestrian route through the Imperial site is now being called a pedestrian route. Loading bays, bike storage and bins indicated on the ground floor instead would impact on the use of this route.
- Proposal will reduce ability for surrounding residents to install solar panels due to existing and additional overshadowing from tall buildings on site.
- Additional hard landscaping not compliant with sustainable drainage.
- Will danger existing mature trees at the edge of the site.
- Light pollution.
- Development will be of no benefit to existing local residents.
- The location of electric substation and waste storage detrimental impact on health and property value;
- No affordable housing provided.
- Increase anti-social behaviour.

Brickfields Area Residents Association

4.27 A joint letter (signed by 15 residents) was received, objecting to the proposal on the following grounds:

- Fully support the representations from St Quentin and Woodlands Forum and St Helens Residents Association.
- Overdevelopment: Plot A proposal will increase this density even more without the provision of necessary infrastructure and facilities for the residents in terms of useful retail units/medical clinics/pharmacies etc.
- 'Public Square', local facilities and height of building: reduced and overshadowed square to what was originally "promised", the square has

potential to become a roundabout for deliveries, additional hard landscaping not compliant with sustainable urban drainage.

- Pedestrian/ Cycling route: Wood Lane, the A40 slipways, Scrubs Lane and North Pole Road are normally congested and worse over the weekends. A cycling and pedestrian route was offered to the residents in Brickfields back in 2010/2012 and which would provide a safer route away from Wood Lane traffic through Imperial grounds and onto future development on the south side of A40. It is inconsistent in the proposal and if this route is still in the proposals, the route from Eynham Road/Shinfield Street appears to go past waste bins and recycling store, loading bays and bike storage, hardly a pleasant short cut.
- Terrace on 9th floor: The disturbance, nuisance and noise break out from such a high-level open terrace adjacent to a quiet residential area is not acceptable.
- Sustainability: The proposed development appears to blight any significant ability for residents to generate power from roof top solar panels with properties already overshadowed by the existing building, particularly by Plot E which has greatly reduced sun reach.

The St Quintin and Woodlands Neighbourhood Forum and St Helens Residents Association

4.28 A resident's association with a membership of some 370 residents in North Kensington (RBKC), located in the area to the east of the site and the West London Line. Object to the application on the following grounds:

- Proposed use as student housing (The application is contrary to Policy WCRA1 in significantly increasing the level of student accommodation on the site and failing to add to 'non-student accommodation');
- Overdevelopment of the site (plot ratio similar of Canary Wharf);
- Building height (proposed 12 storey building would significantly overshadow public square);
- Transport (Plot A shows as PTAL 2 on WebCat model, data for traffic generation is not accurate in terms of volume of deliveries, there are no significant road or traffic improvements proposed, Wood Lane is severely congested route);
- Fire Safety and Evacuation Procedure (necessary provision of a second staircase);
- Failure by the applicants to deliver on S106 commitments (the construction of a pedestrian/cycle underpass between the Woodlands site and the southern end of Latimer Road in RBKC);
- No record of pre-application advice given by the officers.

Support

4.29 One representation received in support. Summarised as follows:

- Imperial College has and is bringing real opportunity to everyone living in the neighbourhood.
- Student accommodation at an affordable rent can help encourage more UK students from outside London and non-traditional university backgrounds to apply to this world class institution.

- It is an open site, with security presence at the entrance. The route from Wood Lane by Scale Space is being landscaped to make an attractive alternative route to avoid traffic fumes on Wood Lane.
- Supportive of the honourable way Imperial College has conducted its planning process, subject to following mitigations measures:
 - Commitment to keep the 220/72 bus stop on Wood Lane outside the Imperial White City campus.
 - No further permissions granted for student or co-living accommodation in White City and Old Oak ward, to avoid studentification of the area and associated negative effects.
 - Construction noise mitigation: No Sunday/Bank Holiday or Saturday morning working (e.g., hoists/crane lifts/similar).
 - To offer any housebound residents within the Brickfields Hall catchment area, with chronic or terminal conditions, a one mid-week UK break or equivalent cash displacement bursary.

Objections from Individual Residents (Second Round)

4.30 17 representations received (to date) to the revised proposals. The objections received are comparable to the representations received to the original proposal, however, are summarised below.

- Proposal would increase density in the area.
- Impact on traffic, bus services and pedestrian movement.
- Impact on health care capacity.
- The public square is reduced in size and landscaping.
- 12 storey building would overshadow central square.
- The square would become a roundabout for delivery vehicles and taxis and would not have any amenity value.
- Promised cycling and pedestrian route through the campus not included in the ground floor plan.
- Residents would not be able to install solar panels as proposed building would overshadow their properties.
- Noise, disturbance and overlooking from proposed open terrace on the 9th floor.
- Potential light pollution from the building.
- Impact from wind tunnels effects.
- No benefits for residents.
- Issues raised by residents in previous consultation events not taken into consideration.

Hammersmith Society

4.31 No response received to date.

Consultation Responses – First Public Consultation (December 2022 – January 2023)

Greater London Authority (GLA)

4.32 The Mayor of London formally considered the original proposal on 30 January 2023 and issued a Stage 1 report. The Mayor's Stage I supports the proposal in principle and the response is summarised below:

- **Land use principles and student accommodation:** The land use proposals and the overall quantum of student accommodation is supported. The quality of the proposed student accommodation is acceptable. 10% of the rooms would be wheelchair accessible which is welcomed.
- **Affordable student accommodation:** 35% affordable housing is currently proposed which is acceptable and would accord with the Fast Track Route criteria in the London Plan.
- **Urban design and heritage:** The design, layout, height, massing and architectural and material quality is acceptable. The proposals would not harm any designated heritage assets.
- **Fire safety:** An additional staircase should be provided on levels 3 and above, in line with the proposed changes to Building Regulations.
- **Transport:** The transport mitigation attached to the wider masterplan consent should be carried over. In addition to this, it is recommended that site specific mitigation is directed at Heathy Streets measures as identified by the Active Travel Zone assessment and ensuring high quality links to the strategic cycling network. Servicing arrangements should be reviewed to maximise the quality of the public realm, walking and cycling routes within the site.
- **Climate change:** The energy strategy is acceptable, subject to further energy efficiency improvements being considered and further discussion regarding compatibility with the existing District Heat Network.
- **Environment:** The retention of Grade A trees on Shinfield Street is welcomed. However, mitigation and replacement planting are required to compensate for the loss of trees on Wood Lane which should be further clarified and secured. The air quality and noise mitigation strategy are acceptable and should be secured.

4.33 The GLA confirm they will not respond again formally to the amended scheme and the next involvement would be at Stage 2 referral, post committee.

Transport for London (TfL)

- 4.34 Further to the Stage 1 response, TfL submitted detailed comments to the original proposal. The comments are summarised as follows:
- **Transport Assessment:** The approach to trip generation and mode share is acceptable on the basis that the transport mitigation package secured for the outline permission is carried over to any new permission for Plot A.
 - **Public Transport:** TfL agrees with the conclusion that the introduction of student accommodation on Plot A would have a lesser impact than the consented academic offices, particularly at peak times on public transport.
 - **Bus Services:** Mitigation is not sought in this instance.
 - **Access and Site Layout:** Further information requested to ensure sufficient capacity and no user conflicts.
 - **Car Parking:** Details of management of two accessible parking bays, accessed from Wood Lane should be submitted to ensure they can be accessed by those who need them; alongside details of distances from the front door to accessible units.

- **CPZ Parking Permit Free obligation:** A Controlled Parking Zone (CPZ) surrounds the site, and any permission should include a 'permit free agreement'.
- **Cycle Parking:** Long and short stay cycle parking meet London Plan standards. In line with London Plan policy T5, the design and quality should meet the London Cycle Design Standards (LCDS) and this provision should be secured by condition. Further details should identify on the plan and mitigation should be secured with regards to the site and the proposed cycle store access from the east of the site and how it will connect to the strategic cycling network (including planning Wood Lane route) in the locality and consider the key destinations / origins of cyclists.
- **Active Travel Zone / Healthy Streets:** Welcome the applicant has undertaken an Active Travel Zone (ATZ) Assessment covering both day and night-time periods. It is noted that the routes to Places of Worship only include Christian sites; this should be revised to reflect London's diverse population. In line with London Plan policy T2, the necessary mitigation to address this and support active travel amongst the proposed site occupants should be secured.
- **Travel Plan:** A framework travel plan has been submitted in support of the application. This is welcomed and the overarching objectives align with London Plan policy T4. The travel plan should be secured, monitored, enforced, reviewed and funded via a planning obligation.
- **Delivery and Servicing:** Notwithstanding the fact that on-site servicing aligns with London Plan policy T7, the current proposals have an adverse impact on the public realm and the cycling access. As TfL noted at pre-application stage, the proposed servicing route dominates the eastern frontage of the site and that vehicles must reverse within the site, on the main walking and cycling route from Wood Lane. TfL requests that the applicant explores options to rationalise the servicing with that for the adjacent block B to optimise the public realm and frontage along this link.
- **Construction:** It is welcomed that a Construction Management Traffic Plan (CTMP) has been submitted, including principles supporting London Plan policy T7. TfL is particularly interested in seeing more detail regarding the provisions for buses and cyclists during the construction phase; and how safe and efficient transport operations on Wood Lane will be safeguarded. Any proposed temporary or permanent changes to the bus stop fronting the site should be agreed in advance with TfL. On this basis, liaison with TfL and the Council is required to agree detail of construction arrangements and a construction logistics plan (CLP) which should be conditioned and signed off by the Council in consultation with TfL prior to commencement in line with policy T4 of the London Plan.
- **Student Management Plan:** A student management plan has been submitted and should be secured in perpetuity as part of any permission, including the necessary monitoring and updates for every academic year.

4.35 No further detailed comments provided by TfL following the revisions.

Royal Borough of Kensington and Chelsea (RBKC)

4.36 No objection to the original proposal. No further comments provided following the revisions.

Historic England

4.37 Confirm no comments to make on the scheme.

Historic England - Greater London Archaeological Advisory Service

4.38 No objection. No further assessment or conditions necessary.

Health and Safety Executive (HSE)

4.39 HSE requested design changes to the original proposals, to comply with the Building Regulations. Necessary in terms of fire safety to provide separated access and egress routes from the accommodation (a second staircase) and to ensure that only suitable materials are used in external walls.

4.40 The HSE confirm the revisions are acceptable in addressing the previous fire safety requirements concerns.

Environment Agency

4.41 No response received.

Thames Water

4.42 No objection. Conditions and informatives recommended regarding the piling method statement and impacts on existing waste and water infrastructure.

Metropolitan Police

4.43 The Designing Out Crime Officer raise no objection to the proposal. Provided design recommendations and encourage further consultation once the detailed design stage is reached.

NHS Northwest London

4.44 Requested a Section 106 financial contribution towards the provision of healthcare facilities within a 1.5-mile radius of the proposed development site.

5.0 POLICY CONTEXT

Planning Policy Framework

5.1 The Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011 are the principal statutory considerations for town planning in England.

5.2 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).

5.3 In this instance the statutory development plan comprises the London Plan (2021), the Local Plan (2018) and the Planning Guidance Supplementary Planning Document - 2018 (hereafter referred to as Planning Guidance SPD). Several strategic and local supplementary planning guidance and other documents are also material to the determination of the application.

National Planning Policy Framework (2021)

- 5.4 The National Planning Policy Framework - NPPF (2021) is a material consideration in planning decisions. The NPPF, as supported by the Planning Practice Guidance (PPG), sets out national planning policies and how these are expected to be applied.
- 5.5 The NPPF does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved and proposed development that conflicts should be refused unless other material considerations indicate otherwise.

The London Plan

- 5.6 The London Plan (2021) was published in March 2021 and is the Spatial Development Strategy for Greater London. The Plan provides the strategic planning policies for London, setting out an integrated economic, environmental, transport and social framework for growth over the next 20-25 years. The proposal has been assessed in line with the updated policies set out in the Plan.

The Local Plan

- 5.7 The Council adopted the new Local Plan on 28 February 2018. The policies in the Local Plan together with the London Plan make up the statutory development plan for the borough. The Planning Guidance Supplementary Planning Document (SPD) (February 2018) is also a material consideration in determining planning applications. This provides supplementary detail to the policies and is organised around key principles.
- 5.8 With regard to this application, all planning policies in the National Planning Policy Framework (NPPF), London Plan (2021), Local Plan (2018), and Planning Guidance Supplementary Planning Guidance (SPD) which have been referenced where relevant in this report have been considered with regards to equalities impacts through the statutory adoption processes, and in accordance with the Equality Act 2010 and Council's PSED. Therefore, the adopted planning framework which encompasses all planning policies which are relevant in Officers' assessment of the application are considered to acknowledge protected equality groups, in accordance with the Equality Act 2010 and the Council's PSED.

6.0 PLANNING CONSIDERATIONS

- 6.1 The main planning considerations material to the assessment of this application are listed below:
- Principle of development - land uses
 - Student accommodation
 - Class E uses
 - Accessibility
 - Fire Safety

- Crime/Safety and Security
- Residential Amenity: including impact on the existing amenity of the neighbouring properties in terms of daylight, sunlight, solar glare, overlooking and privacy.
- Design and Heritage: The design quality/external appearance, including materials of the proposed building; and
- The impact of the development on the street scene and character and appearance of the surrounding conservation areas and other heritage assets.
- Highways in terms of traffic generation, servicing, and parking.
- Energy efficiency and Sustainability; and
- Other environmental impacts including flood risk and drainage, air quality and land contamination, noise vibration, archaeology, wind climate and ecology and biodiversity.

7.0 PRINCIPLE OF DEVELOPMENT - Land Uses

- 7.1 **London Plan Policy GG2 (Making the best use of land)** encourages developments to proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected and on brownfield site and in Opportunity Areas. The same policy encourages the adoption of a design-led approach to determine the optimum capacity of a site.
- 7.2 **Policy SD1 ‘Opportunity Areas’** requires “plan for and provide the necessary social and other infrastructure to sustain growth and create mixed and inclusive communities, working with infrastructure providers where necessary; and support wider regeneration (including in particular improvements to environmental quality) and integrate development proposals to the surrounding areas especially areas for regeneration.”
- 7.3 **Policy E8** refers to London’s higher and further education providers. The policy states their development should be promoted and their integration into regeneration and development opportunities to support social mobility and the growth of emerging sectors encouraged across all parts of London. The supporting text to the policy (at paragraph 6.8.3) makes specific references to Imperial College London. It identifies support for life sciences research, development, manufacturing and commercialisation, including at Imperial’s White City Campus; and then identifies support for the low carbon and environmental goods and services sector in west London, including the development of a major innovation campus by Imperial College at White City.
- 7.4 The proposal is for a mix use development comprising purpose-built student accommodation and a commercial, business and service use (Class E) on part of the ground floor of the building.
- 7.5 The site is a brownfield site in the White City Opportunity Area (WCOA), as defined in the London Plan, the White City Regeneration Area (WCRA) in the H&F Local Plan and in a highly sustainable location. Both Policy WCOA and

WCRA identify a range of acceptable land uses as part of a major mixed regeneration proposal. Reference to student accommodation as an acceptable land use is set out in Policy WCRA. The site is also located in Local Plan Strategic Site Policy WCRA1 'White City East'. This strategic policy requires "White City East" to be developed for housing and employment uses, including creative, academic and research/academic purposes. On sites primarily developed for research/academic purposes, a mix of uses is considered appropriate, including non-student accommodation and other non-academic uses. The potential for over-concentration of student accommodation in this location is a relevant planning policy consideration, given the site circumstances and noting that London Plan Policy H15 requires student accommodation schemes to contribute towards achieving mixed and balanced neighbourhoods. Paragraph 5.26 of the Local Plan adds "Student accommodation will be considered on these sites, but it should not compromise the overall housing capacity of the area, nor should it create large areas of predominantly student housing".

- 7.6 The proposed building would complete the remaining component of a wider comprehensive regeneration development of the Imperial North Campus. The plot forms part of a detailed planning permission (for Plots A&G), granted in November 2020. The focus of this assessment is based on the proposed change from an office led to student accommodation scheme and the amendments to the height, scale mass and design of the development. The proposed development would have a similar floorspace to the last approved 2020 scheme (8,036 sqm GIA). The current proposed total floorspace would be to 8,037sqm GIA.
- 7.7 The delivery of student accommodation on Plot A was not granted by any of the previous planning permissions for the wider masterplan. The site is however located alongside the existing Wood Lane Studios Grad Pad - built out in under the first phase of masterplan in 2012 and provides 606 units of postgraduate student accommodation. The Grad Pad is made up of 4 stepped blocks and play a critical role in the function of campus, in providing a vibrant community for "living, working and studying". Whilst the proposal would bring the overall quantum of post-graduate student accommodation on the White City North Campus site to over 800 units, it is considered that the land use would fit well alongside other similar uses on the campus including the 192 self-contained homes in the 32-storey residential tower. The proposed development would form and complete an integral part of Imperial's White City Campus North and there is a synergy between the student accommodation and the research and development activities on site. The development of Plot A for a student accommodation use is therefore considered acceptable in land use terms.

Student Accommodation Use

- 7.8 **London Plan Policy H1**, Table 4.1, of the London Plan establishes a 10-year target of 16,090 homes for the London Borough of Hammersmith and Fulham. Paragraph 4.1.9 of the London Plan states that net non-self-contained student accommodation should count towards meeting housing targets on a 2.5:1 ratio, meaning 2.5 bedrooms are equivalent to a single home. The Mayor's

Academic Forum has established that there is an annual requirement for 3,500 PBSA bed spaces over the plan period.

- 7.9 The proposal would provide a modern, fit-for-purpose building delivering 216 student bed spaces, the equivalent of 86 conventional housing units. The proposal would contribute positively to the above housing target and subject to meeting the criteria in London Plan Policy H15 and Local Plan HO9 is therefore considered acceptable. This is considered in more detail below.
- 7.10 **London Plan Policy H15 (Purpose-built student accommodation)** seeks to ensure that local and strategic needs for purpose-built student accommodation is addressed. The policy requires student accommodation to contribute to a mixed use and inclusive neighbourhood, with the proposed accommodation for student use, of which most bedrooms, including all the affordable bedrooms, must be secured via nomination agreement. Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation, in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.
- 7.11 An assessment of the proposal in accordance with Policy H15 criteria is set out below:
- (1) at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood
- 7.12 The adjoining “GradPad” student accommodation (Building B in the approved masterplan) has proved successful in helping to create a dynamic “live, study & work hub” on the North campus and has resulted in demand for postgraduate student accommodation far outstripping supply. Plot A immediately adjoins the “GradPad” and as in the case of Building B also fronts Shinfield Street. It is recognised that provision of additional student accommodation on the site provides the opportunity to further develop the postgraduate community, as well as consolidate a clear transition between the established residential community to the north of Shinfield Street and the academic activities within the rest of the Imperial campus. The proposal would meet an existing demand for student accommodation provision in the borough.
- (2) the use of the accommodation is secured for students
- 7.13 The proposed building would be for student accommodation, secured by way of legal agreement and would be operated by the Applicant: Imperial College, an education provider.
- (3) the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider.

7.14 In advance of occupation of the building, an agreement would be required to be entered into under the s106 legal agreement with the Applicant: Imperial College London to ensure the use of the accommodation is secured for students, 35% affordable student accommodation is provided, and that the scheme is managed and operated directly by Imperial.

(4) the maximum level of accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance.

7.15 The Applicant has confirmed that 35% of the proposed student accommodation would be affordable. The student accommodation provision would adhere to the threshold requirements set out in Policy H15 of the London Plan and qualify for the Fast-Track Route, whereby a viability assessment in line with the Mayor's Affordable Housing and Viability SPG will not be necessary.

(5) the accommodation provides adequate functional living space and layout.

7.16 The proposed building will feature 216 student units in the form of studios with ancillary shared living and dining facilities and outdoor amenity space.

7.17 The proposal would provide four different studio typologies. Each studio would have its own en-suite bathroom, cooking/dining space and sleeping/study area. An additional 432 sqm of shared amenity space would be provided, equivalent to 2 sqm per room, together with 180 sqm of outdoor amenity space at Level 09. The units and their layout are considered to offer an acceptable standard of student accommodation.

7.18 Part B of London Plan Policy H15 encourages student accommodation to be in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes. The proposal is itself a mixed-use scheme within a regeneration area with good local and London wide transport connectivity.

7.18 **Local Plan Policy HO9** recognises the London-wide need for student accommodation, and to assist in meeting this need, it will support applications for student accommodation as part of mixed-use development schemes within the White City and Earls Court and West Kensington Opportunity Areas. Applications for student accommodation outside of these areas will be assessed on a site-by-site basis. The principle of student accommodation provision is therefore supported by Policy HO9 subject to the demonstration of no adverse local impacts through the six criteria set out.

7.19 An assessment of the proposal in accordance with the requirements of Policy HO9 'Student Accommodation' of the Local Plan (2018) criteria is provided below:

(a) The site is in an area with good public transport accessibility (with the entrance to the proposed student accommodation within part of the campus defined as having a PTAL of 6a and close to several local convenience services. The scheme would be car free (except for two accessible car parking spaces) and would be permit-free. Furthermore, the provision of accommodation in the immediate vicinity of academic buildings on the Campus North site at Hammersmith Hospital and the proposed Imperial College's South Campus, to be developed to the south of the Westway would generally facilitate travel on foot. The proposals are not considered to generate additional demands for on-street parking.

(b) The site is vacant and would not result in the loss of existing housing.

(c) The development will not have a detrimental impact on the local area subject to the inclusion of a Student Management Plan. A framework student management plan has been prepared as part of the planning application documentation, to demonstrate the amenity of neighbouring properties can be protected and the steps to be taken to minimise the impact of the proposed use on neighbouring uses. There would be no risk of overlooking or loss of privacy and an air quality assessment, a noise assessment, a daylight, sunlight and overshadowing assessment, a flood risk assessment, a wind microclimate report, a transport assessment and a delivery and servicing plan have all been submitted to demonstrate that there would be no effects that might give rise to any significant adverse impacts to adjoining occupiers. A final Student Management Plan would be secured through the S106 Agreement.

(d) As set out above, the proposed accommodation would be of high-quality design, with a range of suitably sized rooms to meet the needs of individual student. The proposed would be acceptable in terms of internal daylighting tested in the submitted Daylight, Sunlight and Overshadowing Report and complying with the recently updated BRE guidance: Site layout planning for daylight and sunlight: a guide to good practice (2022);

(e) Wheelchair accessible accommodation in the form of 21 studios would be provided to meet the needs of disabled students in accordance with relevant British Standards; and

(f) The student accommodation will be secured for occupation by students enrolled with Imperial College London, an Education Provider. A requirement for 35% of the studios provided would be defined as affordable accommodation in line with the London Plan requirements in Policy H15.

7.20 The inclusion of a second staircase has resulted in a reconfiguration of the units which has resulted in a change to the number of bedrooms from 212 to 216. A new studio type has been added to the mix to provide greater variety in the accommodation options, whilst maintain adequate and functional living space for students. The smallest studios are now 17 sqm with the majority of rooms being placed at either the 17 sqm or the 18 sqm to 25sqm range, whilst retaining eight larger premium rooms. The reconfiguration has reduced the

communal space by 86 sqm, however a ratio of 2 sqm per bedroom would be retained. The revised scheme will also provide 21 accessible rooms thereby providing achieving the Local Plan Policy HO6 requirement that 10% of new housing should meet M4(3) accessible design.

- 7.21 The provision of purpose-built student accommodation in this location is supported in the London Plan and Local Plan. The proposed use would provide a complementary use to the existing mixture of uses which contribute towards a balanced community on the wider campus. The campus is maturing, and it is considered that Plot A will make a positive impact in completing the Masterplan and finalising the public realm to create a sense of place and activity. A requirement for 35% of the accommodation to be affordable, would be met in line with the London Plan. Imperial College London (an Education Provider) would manage and operate the accommodation directly and this would be secured in the S106 Agreement. An updated version of the Student Management Plan will be required and would also be secured via a planning obligation prior to occupation. As such the proposal is in accordance with London Plan Policy H15 and Local Plan Policy HO9.

Commercial, Business and Service use (Class E)

- 7.22 A flexible (Class E) Commercial, business and service use is proposed on part of the ground floor which fall within a Class E use – i.e., retail, financial and professional services (not medical); café or restaurant, office, research and development facility, clinics, health centres, creches, day nurseries.
- 7.23 **London Plan Policy E8 (Sector growth opportunities and clusters)** identifies that “employment opportunities for Londoners across a diverse range of sectors should be promoted and supported” with both convenience and comparison retail, cafés and restaurants promoted under Policy E9 (Retail, markets and hot food takeaways). Policies E1 and E2 generally promote development to provide (former “B-class”) office and light industrial uses (now within use Class E(g)). Policies S2 and S3 also are generally supportive of health facilities (within Use Class E(e)) and nurseries (within Use Class E(f)) and Policy S5 promotes the provision of indoor sports, recreation and fitness facilities (within use Class E(d)).
- 7.24 **Local Plan Strategic Site Policy WCRA1 ‘White City East’** broadly requires “White City East” to be primarily developed for research/academic purposes, but only as part of a mix of uses including non-student accommodation and other non-academic uses. However, the supporting text at paragraph 5.26 is more specific in promoting employment and local retail and supporting infrastructure on both of Imperial College’s two key sites to the north of White City East (i.e., Campus North and Campus South) as part of ensuring that the council achieves its aims for regenerating the area for a mix of uses. Policy E1 supports the creation of new employment opportunities whilst Policy CF1 also provides general support for childcare, leisure, recreation, sports and medical and health facilities within Class E, particularly from major development proposals.

- 7.25 Commercial uses are already well-established as acceptable uses for Plot A. The proposed commercial use part of the ground floor is consistent with the Local Plan which seeks to promote a new mixed-use area in White City Regeneration Area, under Policy WCRA1.

Land Use Conclusion

- 7.26 The proposals would deliver further regeneration, increased employment opportunities and student accommodation within the White City Opportunity area, through a development that would support Imperial College London's White City Campus North and would contribute to the creation of high quality mixed-use urban quarter within the Wider White City East sub-area, as sought by Local Plan Policies WCRA and WCRA1 and London Plan policies GG1 (Building strong and inclusive communities) and SD1 (Opportunity Areas).
- 7.27 Officers consider the proposal in land use terms is considered appropriate within this strategic location, and consistent with relevant national, regional, and local planning policies. Officers therefore consider the proposal, subject to S106 legal agreement to secure the benefits identified and agreed, is in accordance with London Plan Policies GG1, GG2, SD1, E8, H1, H15 and Local Plan Policies WCRA, WCRA1 and HO9. These benefits however need to be weighed against the design and form of the proposed new build and whether the development would have an unacceptable impact on the amenities of neighbouring properties and the local area or impact significantly on the highway network and the generation of traffic.

Accessibility

- 7.28 **London Plan Policy S3** seeks to ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach. **London Plan Policy D5** seeks to ensure developments achieve the highest standards of accessible inclusive design and be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
- 7.29 **Local Plan Policy DC1 (Built Environment)** require new development to be designed to be accessible and inclusive to all who may use or visit the proposed buildings. **Policy D2 (Design of New Build)** states that new build development must be designed to respect the principles of accessible and inclusive design. **Principle DA1 (Inclusive design) together with DA2, DA3,** of the Planning Guidance SPD requires that new buildings are designed to be accessible and inclusive to all who may use or visit the building.
- 7.30 Both **London Plan Policy D7 (Accessible housing)** and **Local Plan Policy HO6 (Accessible housing)** require residential development to ensure that at least 10% of all units meet Building Regulation requirement M4(3) 'wheelchair user dwellings' i.e., designed from the outset to be wheelchair accessible, or easily adaptable for residents who are wheelchair users with the remaining 90% to be designed to M4(2) 'accessible and adaptable dwellings'.

- 7.31 The proposed development would comply with this requirement. In total 21 student rooms (equivalent of 10% of the total number of studios) are defined as wheelchair accessible rooms, in accordance with Building Regulation requirement M4(3). The wheelchair accessible units would be distributed throughout the building at various levels to ensure that they are not clustered together.
- 7.32 The external approaches to building entrances, lobbies and vertical circulation that have been reviewed at this stage are designed to meet the guidance of Approved Document M, Volume 2. Two Blue Badge bays would be provided adjacent to the building and close to the main entrance. Accessible cycle parking would be provided at the ground floor of the building. Level access to all floors of the building is provided by two lifts (an 8 person and a 14-person lift), both located in the main core. Level access is provided to the communal space at Level 01 and the external terrace at Level 09. The wheelchair adaptable rooms are located where possible close to the main circulation core to provide a shorter travel distance.
- 7.33 Compliant dimensions of communal corridors, lift and stair landings, and clear landings in front of all entrances would be required throughout detailed design and construction in line with Approved Document M. A minimum of 1500 x 1500mm clear space would be provided outside the lift doors at each level.
- 7.34 The Council's Disability Forum engaged with the Applicant and officers at the pre-application stage. A meeting was held on 21 September 2022. The following recommendations were provided:
- Liaising with the "GradPad" and Imperial's Disability Advisory Service Medical Wellbeing and Disability team on successful design outcomes in other student accommodation projects.
 - Understand whether space for a wheelchair transfer and storage space plus charging plug for 2 wheelchairs would be needed.
 - Ensure prospective students are informed about accessible and inclusive arrangements in each room and on the site.
 - Consider relocating the two furthest wheelchair rooms on Levels 01 and 02 to be near the lifts.
 - Ensure people with limited mobility in hands or arms as well as wheelchair users can open doors and fire doors independently
 - Ensure the fire strategy considers disabled people in event of fire including a strategy for providing PEEPs to individual disabled students that need them.
 - Clarify whether lifts are firefighting and/or fire evacuation lifts.
 - Ensure wheelchair users will be able to use communal amenity space for students on Level 01 and communal rooftop terrace on Level 09 independently (level access, door widths etc).
 - Ensure recycling, refuse arrangements and post boxes will be inclusive for disabled students to use independently.

- Ensure Class E commercial area and toilets including accessible toilets compliant.
- Ensure the D&A statement describes how this development is inclusive for all disabled students. Provide accessible design and inclusive design principles to guide detailed designs later to ensure development complies with all details of ADM Vol 2 and BS8300 2018 Vol 2.
- Ensure the travel plan includes travel plans for all disabled students including location and distance to bus stops and tube stations, nearest pedestrian crossing etc.
- Consider appointing inclusive access consultant to support design team on ensuring disabled students have a positive experience when using this accommodation.

7.35 In response to recommendations highlighted by the Disability Forum at the pre-application stage, the Applicant sought to address and clarify points within the submitted Design and Access Statement (23 November 2022) Section 7.0 'Inclusive Design and Access for all'. Recommendations would be further incorporated where possible in the following design stages of the project (i.e., fit out details).

7.36 A condition is proposed requiring an Inclusive Access Management Plan (IAMP) be provided (Condition 53). This would set out a strategy for ongoing consultation with specific interests' groups regarding the accessibility of site.

7.37 It is considered that the proposal would provide a high-quality environment for disabled and impaired members of the community and the commitments within the Access Statement are positive and deliverable by way of conditions. As such the proposal will comply with Policy D5 and D7 of the London Plan and Policy DC1 and HO6 of the Local Plan.

Fire Safety

7.38 **Policy D12 in the London Plan** requires the applicant to prepare a detailed draft Fire Safety Statement by a suitably qualified third-party assessor, to demonstrate that the proposed development has been designed to offer a safe environment for residents. **Policy D5** further seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

7.39 A Fire Safety Statement for Planning and Fire Safety Form, prepared by Hoare Lea was submitted with the application. However, following changes in building regulations relating to the provision of a second staircase in tall residential buildings, together with the response from Health and Safety Executive (HSE) as a statutory consultee and the Mayor of London, required design changes for the proposal to comply. The proposal has been revised and an amended Fire Safety Statement for Planning and Fire Safety Form, together with additional Fire Engineering Stage 2 report, prepared by Hoare Lea, were submitted in July 2023 alongside a submission to the HSE as part

of the Gateway One process. The proposed revisions are primarily to the internal layout of the building. A second staircase has been added into the design whilst maintaining the functional living space for the occupants.

- 7.40 The fire statement states that the adopted fire safety design standards are Approved Document B volume 1 ('ADB1') and volume 2 ('ADB2'). The design team and fire engineers have considered the functional requirements of Part B of Schedule 1 of the Building Regulations, as well as relevant parts of the London Plan (Policies D5 and D12) and the provisions for mobility impaired escape and the need for evacuation lifts.
- 7.41 Officers have been advised that the size of the development falls within the scope of Regulation 7(2), as the building has a storey height in excess of 18m above the lowest adjacent external ground level, the external wall construction, and specified attachments including balconies, solar shading or solar panels, would achieve European Classification A2-s1, d0 or Class A1, with the exceptions as outlined in Regulation 7(3). Membranes used as part of the external wall construction above ground level should achieve a minimum Class B-s3, d0. The primary external material would be pre-cast panels, and the applicant would ensure it achieves appropriate certification for non-combustible materials. To limit the spread of fire within the building, all wall and ceiling linings will satisfy the appropriate classification stated in Approved Document B Volumes 1 and 2.
- 7.42 Smoke ventilation will be provided in the common corridors. Sprinklers are proposed throughout the building and the sprinkler systems should follow Appendix E of ADB. To facilitate the use of the evacuation lift, all the residential stairs should be provided with refuge spaces with minimum dimensions of 900mm x 1400mm outside of clear escape width of the stair. The refuge would be provided with an emergency voice communication (EVC) system, designed and installed in accordance with BS 5839-9:2011. The campus is provided with a security office which will have 24h management of the fire systems.
- 7.43 The commercial area at ground level would be fully separated from the student rooms on the upper floors, without sharing means of escape facilities. Smoke ventilation will be provided in the common corridors to ensure that the corridors remain tenable in case of a fire in a studio. Final exits serving stairs will be accessed via protected passageways.
- 7.44 Access for fire-fighting appliances is provided to all façades. Guidance of ADB Volumes 1 and 2 have been used for this aspect of the fire strategy and access to the dry riser inlets will be provided within 18m from the fire tender locations.
- 7.45 Public roads and on campus private roads serve all sides of the building. The emergency vehicle tracking route within the site to the siting points for appliances would be clear and unobstructed.

- 7.46 For the reasons outlined, above officers are satisfied that the third-party consultants appointed by the Applicant have considered the building construction, means of escape and evacuation and emergency access arrangements, passive and active fire safety systems and access and facilities for emergency services including firefighting lifts. Accordingly, the current fire safety features proposed demonstrate that the requirements of the Building Regulations have been satisfied.
- 7.47 The HSE were consulted in response to the revised proposals and confirm acceptability of proposed fire safety design and in effect removed their initial objections.
- 7.48 The proposal would be subject to a final assessment of compliance, which would be completed when the Building Regulations application is submitted. Officers are satisfied that the submitted Fire Statement provides sufficient information for the planning stage and recommends that a condition is imposed to ensure that the strategy is implemented, and the development is carried out in accordance with this document. As such the proposal will comply with London Plan Policies D5 and D12.

Crime, Safety and Security

- 7.49 The NPPF seeks to ensure that planning decisions promote public safety and consider wider security and defence requirements. They should anticipate and address all plausible malicious threats and natural hazards and create safe, inclusive, and accessible places that have high levels of amenity and do not undermine quality of life, community cohesion and resilience to due crime and disorder.
- 7.50 **London Plan Policy D11 (Safety, security, and resilience to emergency)** states that Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area. **Local Plan Policy DC1 (Built Environment)** seeks to ensure that new developments, new publicly accessible open spaces and new community and leisure facilities are inclusive and accessible, contribute to improving quality of life and reducing the incidence of crime and anti-social behaviour (paragraphs 2.57, 10.5 and 12.3).
- 7.51 The development has been carefully designed to provide natural surveillance over the adjoining streets and public space. To supplement the on-site staff presence, there will be an electronic access control system and the campus's security office will also be located on the ground floor of the building. In addition, there will be a comprehensive CCTV system covering all entrance and final exit doors, communal spaces, and some internal circulation areas (such as lifts and stair wells), with live CCTV feeds monitored in the building's management office.

- 7.52 Matters relating to security measures in association with the proposed design have been considered by the Metropolitan Police Service - Crime Prevention Officer in order to improve the security of the buildings and their immediate surroundings, bring forward a high standard of public realm and meet 'Secured by Design' accreditation.
- 7.53 The Crime Prevention Officer has been consulted and is generally satisfied the development would be able to achieve a 'Secured by Design' (SBD) silver award once complete, subject to design recommendations provided. Following amendments to layouts, the crime prevention officer confirmed there are no further comments. Officers are satisfied that the overarching SBD principles have been established and reflected in the current proposals and will be carried into subsequent design stages. To ensure the overall security strategy and design intent is retained at the next stage of the design process, a planning condition regarding secure by design criteria is included in accordance with Policy DC1 of the Local Plan which requires development to reduce the opportunities for criminal behaviour.

8.0 AMENITY CONSIDERATIONS

Residential Amenity

Daylight, Sunlight, Overshadowing and Solar Glare

- 8.1 **Policy D6 of the London Plan**, supported by the Mayor's Housing SPG, seeks to ensure that high quality housing schemes are delivered, which includes providing sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing, and maximising the useability of outside amenity space. **London Plan Policy D8** reiterates the importance of ensuring that tall buildings do not compromise the comfort and enjoyment of neighbouring residential properties and open spaces to new development.
- 8.2 There are no specific policies about daylight, sunlight or overshadowing in the Local Plan. **Policy HO11 of the Local Plan** includes requirements for residential developments to avoid detrimental impacts on the amenities of residents in the surrounding area. The policy states the protection of existing residential amenities, including such issues such as loss of daylight, sunlight, privacy, and outlook. **Policy DC1 (Built Environment) and DC3 (Tall Buildings)** require development to be well designed and respect of the principles of good neighbourliness. **Policy DC2 (Design of New Build)** refers to impact generally and the principles of 'good neighbourliness'. **Key Principles HS6 and HS7** of the Planning Guidance SPD seek to protect the existing amenities of neighbouring residential properties, in terms of outlook, light, and privacy.
- 8.3 A daylight/sunlight and overshadowing assessment has been submitted based on the Building Research Establishment (BRE) guidance set out in 'Site Layout Planning for Daylight and Sunlight - A Guide to Good Practice' published in June 2022 and British Standard EN 17037: 2018 – Daylight in buildings. The report is based on the scheme's current proposed design

massing. The 3D computer model for testing daylight, sunlight and overshadowing has been created from the drawing information.

- 8.4 The BRE Guide states in its own introduction that: *“The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design.”*
- 8.5 The residential properties closest to the proposed development which either face directly on to the development site or have an unobstructed view of the development site have been tested, as well as existing amenity areas surrounding the site.
- 8.6 The assessment considers the impact of the proposed development at Plot A on to any adjacent surrounding buildings and amenity areas, as well as the potential light levels within the new student units within the proposed scheme and to the proposed roof terrace. The report also considers the Daylight, Sunlight and Overshadowing impact of the proposed scheme in conjunction with the scheme opposite at 227 Wood Lane. Main habitable rooms of existing neighbouring residential properties have been considered. Habitable rooms in residential properties are defined as kitchens, living rooms, dining rooms and bedrooms.
- 8.7 For daylight adequacy to existing neighbouring residential properties, the Vertical Sky Component (VSC) and No Skyline (NSL) assessments have been carried out, and for sunlight adequacy the Annual Probable Sunlight Hours (APSH) study is carried out. The assessment carried out is based on the standard values/targets set out in the BRE guidelines. Alternative target values referred to for skylight often used in dense urban areas have not been applied in this case.
- 8.8 **The Vertical Sky Component (VSC) test** calculates the amount of skylight received at the centre of an existing window. The target value is at least 27% VSC or more. If this value cannot be achieved, the skylight to the existing window should not be reduced by more than 20% (0.8 times) of its the current value, as this may be deemed to have a noticeable impact on daylight levels.
- 8.9 **The No Skyline (NSL) assessment** (also known as Daylight Distribution test) divides those areas of the working plane within an existing room which can receive direct skylight, from those which cannot. It provides an indication of how good the daylight distribution is within an existing room at working plane level. The BRE advises that an existing room may be affected if the area of the working plane in a room which can receive direct skylight is reduced by more than 20% (0.8 times) of its current value. The Interior Illuminance assessment in the current updated guidance is an alternative climate-based daylight test which uses target illuminance (lux) values.
- 8.10 **Annual Probable Sunlight Hours (APSH)** is the measure of the level of sunlight reaching the window on the external face of a building. The BRE

Guide recommends that the appropriate date for undertaking a sunlight assessment is on 21st March, this being the spring equinox. Calculations of both summer and winter sunlight availability are also made. The target value is at least 25% of annual probable sunlight hours, and at least 5% in winter. If this target cannot be achieved, the existing sunlight values should not be reduced by more than 20% (0.8 times) in either period or have a reduction in sunlight received over the full year greater than 4% of annual probable sunlight hours, which would represent an adverse impact. The target number of hours of sunlight to be received within a proposed room are:

- Minimum level of sunlight exposure - 1.5 hours
- Medium levels of sunlight exposure - 3 hours
- High levels of sunlight exposure - 4 hours

Daylight Assessment

8.11 Daylight results were tested for the 13 terraced properties on the northside of Shinfield Street (nos. 2-26) and 29/29A Pavilion Terrace (located on the corner of Wood Lane and Shinfield Street), together with existing properties located on the west side of Wood Lane in Nightingale House (Du Cane Road/Wood Lane), Cavill House (243 Wood Lane), Browning House (part of the 227 Wood Lane development), and the closest GradPad studio units on the North Campus.

8.12 In summary the following details/results have been provided:

- 344 windows tested for VSC daylight standards (147 = Pavilion Terrace & Shinfield Street and 197 = others).
- 97% of the Pavilion Terrace & Shinfield Street windows (142 out of 147) meet the VSC daylight standard. Of the five windows not meeting the VSC standard 3 result in only a minor loss and two with a moderate impact to Shinfield Street properties.
- 255 of the total 344 windows (74%) meet the recommended VSC daylight standards.
- 185 rooms tested for the NSL standard (41 = Pavilion Terrace and Shinfield Street and 135 = others).
- All the rooms tested in Pavilion Terrace & Shinfield Street meet the NSL standards.
- 32% of the Grad Pad Studios meet the NSL standards.
- 96% (23 out of 24 rooms) tested in Cavill House meet the NSL standards.
- 100% of the rooms tested in Nightingale and Browning House meet the NSL standards.

8.13 The results are summarised in more detail below:

- **29/29A Pavilion Terrace and the 13 properties on the northside of Shinfield Street:** The daylight levels of all the habitable windows/rooms tested with the proposed development in place would meet the recommended standards, with 97% compliance for daylight VSC, and 100% for daylight NSL. The properties therefore meet the BRE guidelines.

- **Nightingale House:** The existing residential flats in the block would meet the recommended standards, with 100% for daylight for VSC and NSL. All the properties therefore meet the BRE guidelines.
- **Cavell House:** The existing residential properties fronting Wood Lane would largely meet the recommended standards for daylight levels for the total habitable windows/rooms tested. 77% meet daylight VSC targets and 96% for daylight NSL. Of the 24 rooms tested for NSL (18 Living/Kitchen/Dining rooms and 6 Bedrooms) the results show that there would be 1 minor reduction to a kitchen at first floor level. All the remaining 23 rooms tested would meet the NSL criteria. The assessment on this property therefore demonstrates a high level of compliance with the BRE guidelines.
- **Browning House:** The existing residential flats would meet the recommended standards for daylight levels and sunlight levels with all the habitable windows/rooms tested with the proposed development in place meeting daylight VSC and 100% for daylight NSL. All the properties therefore meet the BRE guidelines.
- **Wood Lane Studios-GradPad:** A daylight assessment of the existing student accommodation on the North Campus has been carried out with the proposed development in place. Results indicate that only 19% daylight VSC and 32% for daylight NSL, for the existing student bedrooms windows/rooms tested would meet the recommended standards.

Daylight – Conclusion

- 8.14 The overall daylight results demonstrate there is a high level of compliance with the BRE guidelines for all the existing neighbouring properties located outside the campus, with only a minimal impact identified to 5 windows in existing residential properties in Shinfield Street. All the rooms tested for these windows however comply with Daylight - No Skyline (NSL) Assessment. No impact has been identified with respect to 29 and 29A Pavilion Terrace, Nightingale House and Browning House and only one kitchen window not meeting the NSL in Cavill House.
- 8.15 For the Grad Pad Studios, located next to Plot A, there would be more significant reductions in the levels of daylight. 77 windows to the student bedrooms out of 95 windows tested would fall short of the VSC recommendations following development. Of this reduction, 27 windows are considered to have a minor to moderate reduction, and 50 windows are considered to experience a more substantial reduction. For NSL of the 72 rooms tested (2 Living/Kitchen/Dining rooms and 70 student accommodation/bedrooms), the results show that 23 rooms tested would meet the NSL criteria following development of the proposed scheme. Of the remaining room 49 rooms, 6 rooms would fall below the recommendations to minor-moderate level, and 43 rooms would experience a substantial reduction.
- 8.16 The results for the existing student accommodation on the campus are mainly impacted due to the orientation and proximity of the neighbouring plot to

development site and the fact that the existing windows on the west elevation currently face onto an open car park which is an interim situation. The rooms affected, are used as student bedrooms, and are mainly occupied in the evenings and used intermittently for study for the day and are occupied on a short-term letting basis during the academic year. The assessment adds that the daylight distribution contours indicate desk areas in most of the student bedrooms would be located close to the window, where most of the light would be retained and where it is needed most for student study. The BRE guide adds that bedrooms are less important than other habitable rooms and that bedrooms require less daylight than other habitable rooms.

- 8.17 In summary, the results of the assessment show that whilst there are some reductions to neighbouring individual windows, the amount of daylight received within most of the rooms remains high and meets the BRE guidelines. The BRE results therefore conclude that for the most affected buildings outside the campus, the results are relatively good. Officers therefore consider that the overall effects are not so great, or to a level which is unacceptable to warrant refusal of planning permission.

Sunlight

- 8.18 In summary the following details are provided:

- 135 rooms tested for the Annual Probable Sunlight Hours (APSH) Assessment.
- All 40 rooms in the Pavilion Terrace and Shinfield Street properties meet the APSH standard (100%) tested with the proposed development in place.
- All the rooms tested in Nightingale, Cavill and Browning House meet the APSH standards (100%) with the proposed development in place.
- 40% of the rooms in the Grad Pad Studios tested would meet the APSH standards.
- Wood Lane Studios-GradPad - 40% of the rooms tested would meet annual sunlight targets and 17% for winter sunlight with the proposed Plot A development in place.

- 8.19 The overall sunlight results present there is no adverse impact to the existing residential properties at Pavilion Terrace, Shinfield Street, Nightingale House, Cavell House and Browning House. For the Grad Pad Studios, there would be more significant reductions for both annual and winter sunlight. The proposal is acceptable as the students will use their bedrooms mainly in the evenings, and their residency is short term.

Overshadowing Existing Amenity Areas

- 8.20 No. 28 Pavilion Terrace Garden / 29 and 29A Pavilion Terrace Garden / Nightingale House Garden / Cavell House Garden / Grad Pad Studios - Front Amenity Area on Shinfield Street and the central North Campus Amenity Area were all tested for overshadowing.
- 8.21 The overshadowing test show the existing gardens or amenity area at Pavilion Terrace, Nightingale House and Cavell House would meet the BRE

recommendations with no adverse overshadowing impact from the proposals. The central amenity area within the Imperial College campus site would experience a very minor reduction in sunlight below the recommended level of reduction.

Cumulative Impact on Existing Surroundings - Daylight, Sunlight and Overshadowing

- 8.22 An additional assessment based on the cumulative effect of the proposed scheme at 227 Wood Lane, along with the impact of the proposed development on Plot A has been carried out for the existing surrounding residential properties and amenity areas.
- 8.23 The daylight results for 29/29A Pavilion Terrace and properties along Shinfield Street demonstrate that with the cumulative scenario there would be a slight increase to the impact upon existing surrounding buildings and amenity areas with Plot A in place with two additional minor reductions at Pavillion Terrace and along Shinfield Street. Overall, the results would meet the recommended standards with 95% for daylight VSC, and 95% for daylight NSL, of the total habitable windows/rooms tested. The sunlight results state all the existing residential properties would meet the recommended standards.
- 8.24 In the case of Nightingale House, the existing residential flats would meet the recommended standards at 100% for daylight and sunlight of the total habitable windows/rooms tested. For Cavell House there would be a small reduction with 67% for daylight VSC and 96% for daylight NSL, with 67% for sunlight, of the total habitable windows/rooms tested, however the assessment adds this is because of the proposal at 227 Wood Lane being included with Plot A in place.
- 8.25 For the GradPad block, there would be additional impacts to existing student bedrooms that would meet the recommended standards, with 19% daylight VSC and 29% for daylight NSL, whilst for sunlight 40% for annual sunlight and 11% for winter sunlight would be achieved.
- 8.26 In terms of overshadowing to existing amenity areas the cumulative effect shows that the existing amenity areas at Pavilion Terrace, Nightingale House and Cavell House would meet the BRE recommendations with no additional adverse overshadowing impact from the proposals 227 Wood Lane. However, the central amenity area within the Imperial College campus site would experience a minor reduction in sunlight below the recommended level of reduction with both developments in place.
- 8.27 All the neighbouring properties show full compliance with the BRE Guidance. Therefore, the effect on sunlight from the proposed development is likely to be minimal in this case.

Daylight and Sunlight to Proposed Student Accommodation

- 8.28 A daylight and sunlight assessment has been undertaken for the proposed student accommodation bedrooms within the development, in accordance with the BRE guide's recommendations. The BRE advises that daylight and sunlight levels should be assessed for the main habitable rooms of a proposed dwelling. Habitable rooms in residential properties are defined as kitchens, living rooms, dining rooms. Bedrooms are also considered as a habitable room. However, they are considered less important as they are mainly occupied at night.
- 8.29 Daylight factor results show that 43% of the total habitable bedrooms tested within the proposed development would meet the recommended daylight level standards. The interior illuminance results show that 54% of the total habitable windows/bedrooms tested within the proposed development.
- 8.30 The results are lower mainly due to the proximity of the adjacent Grad Pad Studios to the east and the building at Plot G to the south. However, students occupy bedrooms on a short-term basis over the academic year and expected to predominantly spend most of their time in their bedrooms in the evenings or at night-time.
- 8.31 In terms of sunlight, 43% of the total habitable bedrooms tested within the proposed development meet the recommended standards. The BRE guidance acknowledges that if a room faces significantly north of due east or west, the recommended sunlight target is unlikely to be met. In this case many of the student rooms effected would face north or due east. Although the daylight and sunlight levels within most of the proposed student rooms fall below the recommended target, desk in each bedroom would be located close to the window, where most of the light is and where it is needed most for a student.
- 8.32 For overshadowing, the two-hour sun on the ground test was taken at the communal roof terrace at ninth floor level of Plot A. The result of the overshadowing analysis demonstrates that the proposed roof terrace would receive good levels of sunlight, whereby it would receive at least 2 hours of sunlight to more than 50% of its area and would therefore meet the BRE criteria.
- 8.33 With the proposed scheme at 227 Wood Lane to the southwest, if built out as approved, the daylight factor results would vary to some extent and result in a slight increase to the impact upon existing surrounding buildings and amenity areas with Plot A in place. There would be two additional minor reductions to daylight levels at Pavilion Terrace and along Shinfield Street, however there would be no additional impact to sunlight levels at these properties. There would also be four additional reductions to daylight and sunlight at Cavell House, however these reductions would be as a direct result of the proposed 227 Wood Lane scheme given that the windows affected do not face the site at Plot A. There would be reductions to daylight and sunlight to an additional three windows and six rooms at Wood Lane Studios GradPad (B1), and these

reductions range from minor to substantial. There would be no additional reductions to daylight and sunlight at Nightingale House as a result of the proposals at 227 Wood Lane.

- 8.34 The assessment shows 37% of the student bedrooms tested within the proposed development would meet the recommended standards. The interior illuminance results show that 51% of the total windows/rooms tested within the proposed development would meet the recommended standards. The sunlight exposure results show that 43% of the total habitable bedrooms tested, with the proposed scheme at 227 Wood Lane in place. The overshadowing results taken for the communal roof terrace at ninth floor level show that more than 50% of its area would meet the BRE criteria.
- 8.35 Officers have considered effects of the proposals on daylight, sunlight, overshadowing and solar glare. The policy framework clearly supports the flexible application of daylight, sunlight, and overshadowing guidance to make efficient use of land, and not to inhibit density. These policy documents resist the rigid application of guidelines and signal a clear recognition that there may be circumstances in which the benefits of not meeting them are justifiable, so long as acceptable levels of amenity are still enjoyed. Whilst there is the possibility of some isolated alterations in daylight, sunlight and overshadowing to neighbouring properties, the results discussed above illustrate the development will not lead to effects to warrant withholding planning permission. As such, the conclusions presented in the supporting documents are considered acceptable.

Outlook/sense of enclosure

- 8.36 **Local Plan Policy DC2 and Policy DC3** state that all new builds and tall buildings must be designed to respect good neighbourliness and the principles of residential amenity. **Local Plan Policy DC2**, at part E states that all proposals must be designed to respect good neighbourliness and the principles of residential amenity.
- 8.37 **Key Principle HS6** of the Planning Guidance SPD states that 'The proximity of a new building or an extension to an existing building can have an overbearing and dominating effect detrimental to the enjoyment by adjoining residential occupiers of their properties' and prescribes a method for assessment of outlook:' Although it is dependent upon the proximity and scale of the proposed development, a general standard can be adopted by reference to a line produced at an angle of 45 degrees from a point 2 metres above the adjoining ground level of the boundaries of the site where it adjoins residential properties. If any part of the proposed building extends beyond these lines, then on-site judgement would be a determining factor in assessing the effect which the extension would have on the existing amenities of neighbouring properties.' Where original rear gardens are less than 9 metres depth, a measurement is taken from ground level at the boundary. Where there are existing circumstances, such as buildings which would be replaced in a redevelopment, it would be inappropriate not to have regard to these.

8.38 At present neighbouring residential properties in Shinfield Street/Pioneer Way, west side of Wood Lane and the Grad Pad have unobstructed views across to a temporary car park, meaning they enjoy daylight and outlook conditions which are more akin to a suburban location rather than an urban environment in central London. It would not be realistic for there to be an expectation that this character should prevail for a brownfield site in a regeneration area and consideration to the previous permissions on this site including the extant 2020 permission. The height, form and massing of the proposed development has been designed to respond to existing surrounding conditions, with a stepped arrangement. The tallest element of the proposed development is set furthest away from the residential properties to the north in Shinfield Street, reducing in height to 3 storeys on the northern boundary.

8.39 The tallest 12 storey element of the proposed development would be located on the southernmost part of the site and furthest from the residential properties in Shinfield Street. Although the proposal would be taller than the 2020 permission, officers consider that the design of the development has been carefully considered to minimise the impacts on outlook and privacy and both the principle and height, scale, design/form of the proposed development is acceptable. Officers conclude that whilst the development is clearly visible from surrounding the neighbouring properties, it would not adversely harm the amenities of the surrounding occupiers. Based on on-site judgement, it is considered that the loss of outlook or increase the sense of enclosure would not be to such an extent to warrant the withholding planning permission.

Privacy/overlooking

8.40 **Key Principle HS7 (iii)** of the Council's Planning Guidance SPD sets an 18m standard from windows in new development to existing windows, in order to protect privacy. The SPD clarifies that the 18m distance would 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.

8.41 The design of the buildings has considered minimising the potential for overlooking and decreased sense of enclosure. The stepped arrangement similar to the approach followed on the Grad Pad buildings would break up of the mass and reduce the scale of the building when viewed from neighbouring residential properties.

8.42 In relation to the neighbouring properties, the buildings ensure window to window separation distance are a minimum of 18m. It is considered that the gap between the development and closest neighbouring properties would ensure that no loss of privacy or significant overlooking would occur to existing properties. Accordingly, officers are of the opinion that the proposal would not have an unacceptable impact on the privacy to neighbouring properties. Further details of the proposed material and glazing treatment to windows are required to be submitted by condition. Whilst acknowledging the objections received, it is considered that the proposed building does not result in a significant loss of outlook, privacy or overlooking to neighbouring properties to warrant refusal of planning permission and as such, it is

considered that it complies with Local Plan Policies DC2, DC3, HO4 and HO11 and Key Principle HS6 and HS7 of the Planning Guidance SPD.

- 8.43 Overall officers are satisfied that the proposal would provide acceptable amenity and environmental standards for existing and future residents. The proposals are considered to be well designed and in accordance with the NPPF, London Plan, and Policies HO11, DC1, DC2 and DC3 of the Local Plan and the Council's Planning Guidance Supplementary Planning Document.

9.0 DESIGN, HERITAGE, AND TOWNSCAPE

Design

- 9.1 **The NPPF** 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.
- 9.2 **The NPPF** 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 users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 9.3 Chapter 3 (Design) of the London Plan 2021 seeks to secure the delivery of good design through a variety of ways. Policies D3 (Optimising Site Capacity through the Design-Led Approach), D4 (Delivering Good Design), D6 (Housing Quality and Standards), D8 (Public Realm) and D9 (Tall Buildings) are particularly relevant to the consideration of this application. Policy D3 highlights that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, through careful consideration of issues such as form and layout, experience, alongside consideration of quality and character. Policy D4 highlights that where appropriate, visual, environmental and movement modelling /

assessments should be undertaken to analyse potential design options for an area, site, or development proposal. These models, particularly 3D virtual reality and other interactive digital models alongside use of design review should, where possible, be used to inform decision-taking, and to engage Londoners in the planning process. Policy D6, promotes a series of quality and standards new housing development should aim to achieve. Policy D8 sets a series of criteria to ensure that ensure the public realm is well-designed, safe, accessible, inclusive, attractive and well-connected. Policy D9 promotes a plan-led approach to tall buildings and a framework to assess the impacts of such developments.

- 9.4 **Local Plan Policies DC1, DC2 and DC3** are particularly relevant to the assessment of design. Policy 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 DC3 (Tall Buildings) identifies four areas within which tall building may be appropriate, including White City Regeneration Area; the policy also sets a framework to assess proposals for tall buildings in those areas.

Architectural Character

- 9.5 The architectural character of the proposal scheme is informed by the varied character of the local area, and particularly the more recent developments which have taken place within the White City Regeneration Area, most notably the Imperial College, North Campus. The treatment of the proposed development aims to create a positive response to this character whilst also giving the scheme its own distinctive appearance. The elevations would be formed by a precast concrete panel frame structure, with use of copper-coloured aluminium cladding. Within this grid structure, larger “double bays” with extensive glazing are proposed at ground floor level and at first floor level to the south elevation and most of the west elevation. Single bays inset with buff-coloured and copper-coloured aluminium cladding and “domestic scale” windows (with copper-coloured aluminium spandrel panels) are proposed to the remainder of the first floor and all floors above.

Tall Building

- 9.6 As part of a building which varies in scale, the tallest element of the building is at 12 storeys and has been subject to significant design development to ensure that the appearance and architectural detailing of the scheme is of the highest quality achievable.
- 9.7 Overall, the building is composed of a strong structural grid which gives the proposal a clear and robust expression. This is coupled with the transition in the scale of proposals from the interface with Shinfield Street to the south.

- 9.8 The design of the tall building features a well-designed recessed top feature which has a double-height order featuring a complementary structural frame detailed in glazing and vertical metal louvres. This approach gives the building a distinctive 'crown' feature. The metal louvre detailing also forms a feature of the northern elevation of the development to the building core. This detailing is helpful to break-up this elevation and give the building a complete approach to its appearance.
- 9.9 The development seeks to bring forward uses which would add additional activity and provide animation to the public realm surrounding the site, particularly along Wood Lane and the central pedestrian entrance to the Imperial North campus.
- 9.10 The proposals have been subject to review by the Hammersmith and Fulham Design Review Panel, where the panel supported the approach to design of the building.
- 9.11 1:20 bay studies of the development, further details of the proposed materials and sample panels are proposed to be secured by condition as part of the suggested conditions attached to this report.
- 9.12 The introduction of a second staircase has necessitated in minor alterations to the elevational treatment. The architectural approach has not however been compromised with key features such as the open colonnade, flexible uses at ground floor, legible corner features, double height glazing and good building materials all been retained. Overall, it is considered that the proposal scheme would provide a high quality of design which would both improve and complement the quality of other tall/large buildings within the White City Regeneration Area and the wider area.

Tall Building Assessment

- 9.13 **Local Plan Policy DC3 (Tall Buildings)** highlights, tall buildings, which are significantly higher than the general prevailing height of the surrounding townscape and which have a disruptive and harmful impact on the skyline, will be resisted by the council. The policy also highlights several areas within which development of tall buildings would be appropriate.
- 9.14 The application site is situated in an area within which tall/large buildings would be considered appropriate. Therefore, the principle of a tall building-up to 12 storeys would comply with Policy DC3 in this regard.
- 9.15 Local Plan (2018) Policy DC3 provides a framework for the assessment of applications for tall buildings in regeneration areas. Tall buildings, which have a disruptive and harmful impact on the skyline, will be resisted by the council. The framework includes a number of criteria which should be met:

Impact assessment

a. has a positive relationship to the surrounding townscape context in terms of scale, streetscape and built form;

9.16 As suggested above, the scale of the proposed tall building forms part of a building which creates a transition in scale between the residential terraces to the site, to the more significant 10+ storey tall buildings within the Imperial North Campus. As such, the development is considered to have a positive relationship to the surrounding built form.

b. is of the highest quality of architectural design and materials with an appropriate form and silhouette which contributes positively to the built heritage and image of the borough;

9.17 The architectural appearance of the development has a complementary character to other high-quality buildings within the local environment; namely the School of Public Health, (currently under construction) and the Gradpad buildings. The development would form a positive frontage to both Shinfield Street and Wood Lane, complementing the character of the wider Imperial North Campus.

c. has an acceptable impact on the skyline, and views from and to open spaces, the riverside and waterways and other locally important views and prospects;

9.18 The proposal would, due to the presence of other tall buildings across the Imperial North Campus have limited visibility within local views. This visibility would also be reduced in future if the consented redevelopment of 227 Wood Lane were to be implemented. As such, whilst the development would lead to some localised changes to views, these changes are not considered to be detrimental; given the presence of other tall buildings within these views.

d. has had full regard to the significance of heritage assets including the setting of, and views to and from, such assets, has no unacceptable harmful impacts, and should comply with Historic England guidance on tall buildings;

9.19 The development is not considered to result in any harm to the setting of adjacent heritage assets. (Further detailed assessment of this element is provided later in this report).

e. is supported by appropriate transport infrastructure;

9.20 The development is a car-free development, in close proximity to Wood Lane/White City tube stations. An appropriate level of cycle parking provision is also designed in to the scheme.

f. has an appropriate design at the base of the tall building and provides ground floor activity;

9.21 The base of the building is considered to provide a high level of ground floor activity, incorporating Class E units and an activated ground floor frontage to Wood Lane.

g. interacts positively to the public realm and contributes to the permeability of the area;

- 9.22 The development is designed to complete the final phase of the Imperial North campus, building upon the public realm/permeability principles of the original masterplan. This would also include improvement to the public realm within Wood Lane.

h. is of a sustainable design and construction, including minimising energy use and the risk of overheating through passive design measures, and the design allows for adaptation of the space;

- 9.23 The proposal is considered to be of a sustainable design and seeks to achieve an 'Excellent' BREEAM rating. Further detailed consideration of these matters is made elsewhere in this report.

i. does not have a detrimental impact on the local environment in terms of microclimate, overshadowing, light spillage and vehicle movements; and

- 9.24 The proposals are not considered to have a detrimental effect on the local environment. Again, further detailed consideration of these matters is made elsewhere in this report.

j. respects the principles of accessible and inclusive design.

- 9.25 The proposals are considered to meet the principles of accessible and inclusive design. Again, further detailed consideration of these matters is made elsewhere in this report.

- 9.26 Overall, the proposal scheme is considered to comply with Local Plan (2018) policy DC3 and the development of a tall building would not result in a disruptive or harmful impact upon the skyline.

- 9.27 **London Plan Policy D9 (Tall Buildings)** is split into three elements, Part A provides a London wide definition of a tall building, Part B, highlights the need for boroughs to take a plan-led approach to the development of tall buildings within Local Plans, and Part C provides an impact framework to assess proposals for tall buildings. The policy definition for a tall building is a building which is 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.

- 9.28 Consequently, at 12-storeys the proposed development would constitute a tall building for the purpose of Policy D9.

- 9.29 The following section provides a detailed assessment of the application against the impact framework of Policy D9 as required based on part C of the policy.

Impact assessment

Visual Impacts

- 9.30 a) *the views of buildings from different distances:*
- i. *long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views*
 - ii. *mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality*
 - iii. *immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.*
- 9.31 The proposed development, given the scale of the tall building up to 12 storeys and the scale of adjacent tall buildings, would impact upon predominantly upon immediate, mid-range views. The application is supported by a detailed Townscape, Visual and Heritage Impact Report. (TVHIR).
- 9.32 The outcomes of this assessment are considered in later sections of this report. The area surrounding the application site currently features several other large/tall buildings, mainly through the ongoing development of the White City Regeneration Area, and more locally the Imperial College North Campus.
- 9.33 In summary, the existing and consented large/tall buildings within the surrounding area serve to significantly screen views and visibility of the proposal scheme particularly in mid and long-range views. The new building would successfully coalesce with the existing buildings to avoid a harmful and disruptive impact upon the skyline. The main extent of visibility and impact would be within eastbound views from Bentworth Road, and southbound views along the corridor of Scrubs Lane and Wood Lane. In these views the harmful impacts of the development upon the skyline would be limited due to the existing cluster of tall buildings forming the Imperial North Campus, namely 88 Wood Lane and the Sir Michael Uren Building developments. The proposal would serve to create a more balanced and gradual transition when the group of tall buildings are appreciated in these views.
- a) *whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding*

- 9.34 The proposed development would create a more gentle and gradual transition between the existing/proposed cluster of tall buildings within the Imperial North Campus. The proposal scheme would therefore aid legibility and wayfinding to this campus.
- b) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.*
- 9.35 The architectural quality of the development has been fully considered throughout the design process and subject of Design Review. The use of pre-cast concrete as the main interface material of the development would be durable throughout its lifespan. The details of bay studies will be provided through condition.
- c) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area*
- 9.36 The proposal site is not located in a Conservation Area and does not include any heritage assets. Following careful consideration of the impacts of the development, (as discussed in the section below), the proposals would not result in any harm to the setting or significance of any adjacent heritage assets.
- d) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it*
- 9.37 The proposal site is not within the setting of any World Heritage Site.
- e) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river.*
- 9.38 The proposal is not located close to the river Thames. Therefore, there would be no impact in this regard.
- f) buildings should not cause adverse reflected glare*
- 9.39 The design principles of the scheme include provision of fenestration set into reveals and the scale of fenestration is limited to achieve thermal efficiency of each student room. As such, these measures should avoid adverse reflected glare from the development upon the surrounding environment.
- g) buildings should be designed to minimise light pollution from internal and external lighting*

- 9.40 The existing site will be replaced with a mixed use development. A condition would ensure that external illumination from all external artificial lighting relating to the development shall be in accordance with the recommendations of the Institution of Lighting Professionals in the 'Guidance Note 01/21 for the reduction of obtrusive light 2021'.

Functional Impacts

- 9.41 The second set of impacts to be assessed under Policy D9 are the functional impacts. As evidenced in the submitted Design and Access Statement, there are dedicated access, entry, and maintenance, that show these concerns have been thought about during the design process. Incorporating these domains into the design from an early stage has resulted in a proposal that would function in a safe and efficient manner while preserving the amenity of neighbours and residents. Additionally, a Fire Statement, details the safety measures utilised in this design and authenticates the fire safety level of the proposed building. This is in line with part C2(a), (b), and (c) of Policy D9.
- 9.42 Transport impacts are dealt with by part C2(d) of Policy D9 and it must be demonstrated that the transport network has capacity to accommodate the development. The submitted Transport Assessment has found that there are no sound transport objections to the proposal and so it is clear that the local transport network has sufficient capacity. As the transport assessment shows, the proposal is located near London Underground, there are several bus routes and the local street and cycle network is flat, and usable so that residents of this development would have plentiful transport options, despite not having access to a car.

Environmental Impacts

- 9.43 The third set of impacts to be assessed under Policy D9 are the environmental impacts of the development. The proposed development is seeking to achieve an 'Excellent' BREEAM rating which ensure that this proposal would meet the highest environmental and sustainability standards.
- 9.44 A Daylight, Sunlight, and Overshadowing Assessment has been prepared which shows that there would be some minor reduction in terms of daylight amenity for the surrounding area. The Assessment however states the neighbouring properties will retain a good level of amenity for an urban location, and therefore some reductions are inevitable.
- 9.45 Overall, it is considered that these reductions are acceptable and that the retained levels of sunlight and daylight amenity are good for an urban location such as this. Consequently, this proposal would not have an unacceptable impact on surrounding daylight and sunlight levels.
- 9.46 The form of the building would have a stepped effect, with varying height, and the taller element is furthest away from surrounding properties to the north. Therefore, part C3(b) of Policy D9 is complied with.

Tall Building conclusion

- 9.47 Considering the development of a tall building at this location, the principle of development is supported by Local Plan Policy DC3. Given the surrounding townscape context, (namely the emerging Imperial North Campus), the current proposals are not considered to have a disruptive or harmful impact on the skyline for the purposes of Policy DC3.
- 9.48 Furthermore, the scheme is considered to provide a positive addition to the skyline and the surrounding townscape creating a more balanced and transition between existing and consented tall buildings and the lower density of the residential context to the north of the site. As such, the proposal is considered to comply with the impact frameworks set out in Local Plan (2018) Policy DC3 and London Plan (2021) Policy D9.
- 9.49 The scheme is considered to provide a positive addition to the skyline and the townscape of the borough and would comply with both Local Plan (2018) Policy DC3 and London Plan (2021) Policy D9.

Heritage and Townscape

- 9.50 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.
- 9.51 It is key to the assessment of these applications 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 s.66 duties of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the requirements set out in the NPPF.
- 9.52 **S66 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.
- 9.53 **Paragraph 184 of the NPPF** states: Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to of Outstanding Universal Value. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 9.54 **Paragraph 190 of the NPPF** states: Local Planning Authorities should identify and assess the significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of

a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

- 9.55 **Paragraph 192 of the NPPF** states: In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.
- 9.56 **Paragraph 193 of the NPPF** states: 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.
- 9.57 **Paragraph 194 of the NPPF** states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
 - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be exceptional.
- 9.58 **Paragraph 195 of the NPPF** states that where a Proposed Development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.
- 9.59 **Paragraph 202 of the NPPF** states: 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.
- 9.60 **The NPPF** makes a clear distinction between the approach to be taken in decision-making where the Proposed Development would affect the significance of designated heritage assets (listed buildings, conservation

areas, Registered Parks and Gardens) and where it would affect the significance of non-designated heritage assets (buildings of local historic and architectural importance).

- 9.61 **The NPPF** also makes a clear distinction between the approach to be taken in decision-making where the Proposed Development would result in 'substantial' harm and where it would result in 'less than substantial' harm.
- 9.62 Case law indicates that following the approach set out in the NPPF will normally be enough to satisfy the statutory tests. However, when carrying out the balancing exercise in paragraph 202, it is important to recognise that the statutory provisions require the decision maker to give great weight to the desirability of preserving designated heritage assets and/or their setting.
- 9.63 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.
- 9.64 The scheme would impact indirectly on heritage assets. These impacts are considered separately in the following sections.
- 9.65 Impacts are mainly focussed upon the setting of a limited number of heritage assets, including statutory Listed Buildings and Conservation Areas. In order to fully assess the proposal scheme, officers have agreed the scope of supporting documents with the applicant. The applicant's statements submitted with the application, identifies the significance of designated/non-designated heritage assets within a study area surrounding the application site, within Hammersmith & Fulham.
- 9.66 In the first instance, the assessment to be made is whether the development within the setting of a designated heritage asset will cause harm to that designated heritage 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 202 and 203 of the NPPF as appropriate.
- 9.67 **Local Plan Policy DC8 (Heritage and Conservation)** states that the council will conserve the significance of the borough's historic environment by protecting, restoring, and enhancing its heritage assets. These assets include listed buildings, conservation areas historic parks and gardens, the scheduled monument of Fulham Palace Moated site, unscheduled archaeological remains and buildings and features of local interest. When determining applications affecting heritage assets, the council will apply the following principles:
- a. the presumption will be in favour of the conservation, restoration and enhancement of heritage assets, and proposals should secure the long-term future of heritage assets. The more significant the designated

- heritage asset, the greater the presumption should be in favour of its conservation;
- b. applications affecting designated heritage assets, including alterations and extensions to buildings will only be permitted if the significance of the heritage asset is conserved or enhanced;
 - c. applications should conserve the setting of, make a positive contribution to, or reveal the significance of the heritage asset. The presence of heritage assets should inform high quality design within their setting;
 - d. applications affecting non-designated heritage assets (buildings and artefacts of local importance and interest) will be determined having regard to the scale and impact of any harm or loss and the significance of the heritage asset in accordance with paragraph 135 of the National planning Policy Framework;
 - e. particular regard will be given to matters of scale, height, massing, alignment, materials and use;
 - f. where changes of use are proposed for heritage assets, the proposed use, and any alterations that are required resulting from the proposed use should be consistent with the aims of conservation of the asset's significance, including securing its optimum viable use;
 - g. applications should include a description of the significance of the asset concerned and an assessment of the impact of the proposal upon it or its setting which should be carried out with the assistance of a suitably qualified person. The extent of the requirement should be proportionate to the nature and level of the asset's significance. Where archaeological remains of national significance may be affected applications should also be supported by an archaeological field evaluation;
 - h. proposals which involve substantial harm, or less than substantial harm to the significance of a heritage asset will be refused unless it can be demonstrated that they meet the criteria specified in paragraph 133 and 134 of the National Planning Policy Framework;
 - i. where a heritage asset cannot be retained in its entirety or when a change of use is proposed, the developer should ensure that a suitably qualified person carries out an analysis (including photographic surveys) of its design and significance, in order to record and advance the understanding of heritage in the borough. The extent of the requirement should be proportionate to the nature and level of the asset's significance;
 - j. the proposal respects the principles of accessible and inclusive design;
 - k. where measures to mitigate the effects of climate change are proposed, the applicants will be required to demonstrate how they have considered the significance of the heritage asset and tailored their proposals accordingly;
 - l. expert advice will be required to address the need to evaluate and conserve archaeological remains, and to advise on the appropriate mitigation measures in cases where excavation is justified; and
 - m. securing the future of heritage assets at risk identified on Historic England's national register, as part of a positive strategy for the historic environment.

9.68 The Council's Supplementary Planning Guidance SPD is relevant, in particular Key Principles AH1 (Information Requirements for applications for

consent affecting heritage assets); AH2 (Protection of Heritage Assets); CAG1 (Land Use in Conservation Areas); CAG2 (Urban Design in Conservation Areas) and CAG3 (New Development in Conservation Areas). These Key Principles provide guidance which seeks to ensure that heritage assets are conserved in a manner appropriate to their significance in accordance with the NPPF.

Application site – Heritage constraints

- 9.69 The application site is not located within a Conservation Area and does not feature any designated/non-designated heritage assets.

Approach to assessment of heritage and townscape

- 9.70 The assessment deals with heritage and townscape issues in two ways. Firstly, there is a review of the wider of wider townscape implications of the development; focussed in-part upon consideration of key heritage receptors. Secondly, the assessment reviews the impact of the development upon the character, significance and setting of heritage assets.
- 9.71 Given that the application site is not located in a Conservation Area and does not contain any listed buildings, the main considerations of the scheme relate to the impact of the development upon the setting of surrounding heritage assets. To support the assessment of these impacts, as discussed above, the applicant has submitted a fully detailed Townscape, Visual and Heritage Impact Report, (TVHIR) and a Planning Statement.
- 9.72 Details of the outcome of these assessments are considered below.

Townscape Assessment – Views

- 9.73 To assess the impact of the Proposed Development, the application includes a Heritage, Townscape and Visual Impact Assessment which assesses a series of views from an agreed selection of locations around the site. Within some of the images, wirelines have been used, where the degree of visibility or impact on the skyline is the most important part of the assessment. However, most of the studies are fully rendered representations of the proposed scheme which indicate the development and the design of the facades in its urban context.
- 9.74 Given the scale of recent developments both existing and consented as part of the regeneration of White City, the townscape impacts of the proposed development would be significantly reduced. The development would in many views be either screened or coalesce with existing large/tall buildings in the local area.

Westward facing Views

- 9.75 In most of the westward facing views, (particularly views within RBKC), the visibility of the proposal scheme would be limited. Existing tall buildings within the Imperial North Campus would largely screen the proposal, with limited glimpsed views of the top floors or side profiles of the taller element of the scheme visible the only elements visible within these views.

- 9.76 The scope of change would be negligible, and the impact of change would be neutral/beneficial.

Northward facing Views

- 9.77 Within northward facing views, the development would again be largely screened by the presence of other tall/large buildings forming the Imperial North Campus (including Building F and G) and the elevated section of the Westway.
- 9.78 The scope of change would be negligible and the impact of change neutral/beneficial.

Southward facing views

- 9.79 Within southward facing views, particularly those from Scrubs Lane/Wood Lane the development would have additional visibility in a small series of views. However, cumulatively, this visibility needs to be considered based upon other tall buildings currently occupying these views, namely the on-going development of the Plot G, (School of Public Health) and 88 Wood Lane. In these localised views the development would form a slightly more prominent, yet transitional building to these more significant taller buildings.
- 9.80 The scope of change would be moderate and the impact of change neutral/beneficial.

Eastward facing views

- 9.81 In many eastward facing views of the development the proposal scheme would be viewed adjacent to both Plot G, (School of Public Health) and the existing 88 Wood Lane development. The building would balance and provide a gentler transition between this building and the predominant foreground residential context of views. This visibility would also be reduced significantly in future, if redevelopment of the adjacent 227 Wood Lane site were to be implemented.
- 9.82 The scope of change would be moderate and the impact of change neutral/beneficial.
- 9.83 Townscape impacts of views within the local area have been considered, and it is considered that although the proposal would result in some change to views, the impact of these changes, would be largely neutral/ beneficial.

Impacts on Heritage Assets

- 9.84 The proposal site is not situated within a Conservation Area and does not feature any designated/non designated heritage assets. Given the scale and massing of the proposed development, there is a need to consider wider impacts upon the setting, character and significance of surrounding Conservation Areas and heritage assets.

Heritage Assets - Conservation Areas

- 9.85 The proposed development would have limited impacts upon the setting of adjacent Conservation Areas. With the only area being affected being the Old Oak and Wormholt Conservation Area.
- 9.86 The Old Oak and Wormholt Conservation Area was designated in May 1980. The significance of the Conservation Area is largely focused upon the grain, layout and character of residential estates of Old Oak and Wormholt. These estates are notable examples of the suburban extension of London and high quality, planned early twentieth century public housing. The estates have distinctive 'cottage garden' character and garden suburb architecture; complemented by open areas and soft landscaping. The Westway environs have a slightly distinctive character to the more structured and complete Old Oak and Wormholt Estates.
- 9.87 Generally, the setting of the Conservation Area varies significantly, featuring a variety of post-war housing developments, Wormwood Scrubs prison and Hammersmith Hospital Campuses. The wider setting of the area also features the recent and ongoing development of the Imperial North Campus. Consequently, the contribution of setting to the significance of the asset is also varied. Whilst the estates themselves are well preserved and are complemented by the character of other post-war housing developments, other more recent developments have a distinctive and contrasting appearance to that of the Conservation Area. However, the character and appearance of the estates remains clearly legible overall.

Assessment of Impact

- 9.88 The proposal scheme would be visible in several background views of the Conservation Area, mainly from the Westway area, in these views the development would be situated adjacent to existing tall buildings occupying the Imperial North Campus, as such the building form would coalesce with the existing buildings. Although visible within these background views, the development would have a clear contrast with the well-preserved character of the Conservation Area, which has remained clear and legible following the implementation/completion of these other developments. As such, given this contrast the development is not considered to result in any harmful impact upon the setting of the Conservation Area.

Heritage Assets – Statutory Listed buildings and Locally Listed (Buildings of Merit)

- 9.89 There are a few listed buildings in the vicinity of the site, the setting of which may be affected due to a potential inter-visibility with the Proposed Development.
- 9.90 Following consideration of these assets, the only heritage asset which require assessment is the Grade II listed Burlington Danes School.

Assessment of Harm

- 9.91 The applicant has considered the impact of the proposed development upon the setting of this heritage asset through careful consideration of views of the

site, namely from the courtyard/playground of the school. In these views, more modern developments as part of the school campus and the adjacent Latymer School would largely screen the proposed development. As such, whilst the tall building proposed would be partially visible within the setting of adjacent heritage assets, the character and appearance of these assets and their setting would be preserved overall. Given the distances between the proposed development and these assets, (alongside intervening developments), the impact of visibility upon the setting of each asset would be limited and as such, officers do not consider that the development would result in any harm to the setting or significance of these heritage assets. As such the development would be considered acceptable having regard to and applying the statutory provisions in Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Design, Heritage, and Townscape Conclusion

- 9.92 The proposed scheme represents an opportunity to optimise development of a partially vacant site in accordance with the London Plan and Council's Local Plan policies. The site currently fails to contribute positively to the permeability, legibility, and identity of the local area overall and the proposed scheme provides considerable potential to address these issues.

Urban Design and Heritage Balance:

- The application site is located within an area identified as suitable for the development of a tall building by Local Plan policy DC3 and London Plan Policy D9. Following careful consideration, officers conclude that the proposed development would not result in any disruptive and harmful impact on the skyline and would therefore comply with the impact framework of both of these policies.
- The proposed scale and massing of the proposal is not considered to result in any harm to the setting or significance of any nearby heritage assets.
- The development would have some intervisibility in localised townscape views. However, the impact upon these views would be neutral to beneficial overall.
- The configuration, design and materiality of the proposed development is thought to be well considered and would provide a high-quality development which would enhance the appearance of the local area, complementing the character of other tall buildings in the local area, including recently completed/ongoing developments within the Imperial North Campus.

- 9.93 Officers have assessed the impact of the proposal on the heritage assets and consider that for the reasons summarised above it is appropriate to grant planning permission having regard to and applying the statutory provisions in Section 66 and 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. In summary, it is considered that by optimising the use of the site to provide a development of this scale it is possible to provide the number of significant

important benefits outlined above. Although some elements of conflict with policy have been identified above, overall, the Proposed Development is considered acceptable having regard to the NPPF, Policies D3, D4, D6, D8, D9 and HC1 of the London Plan (2021) and Policies DC1, DC2, DC3, DC7 and DC8 of the Local Plan (2018).

10.0 HIGHWAYS AND TRANSPORT

- 10.1 **The NPPF** 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. 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.
- 10.2 In determining this application, consideration has been given to the requirements of **Policies GG2, GG3, T1, T2, T4, T5, T6, T6.1, T6.5 and T7 of the London Plan**, as well as the Healthy Streets for London strategy, published by TfL, in assessing the effects on the local highway network along with the proposed car parking, cycling parking and servicing requirements.
- 10.3 **London Plan Policy T6** sets 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 in relation to blue badge parking at Policies T6.4 and T6.5. London Plan Policy T5 sets out the requirements for cycle parking in accordance with the proposed use.
- 10.4 **Policies T1, T2, T3, T4, T5 and T7 of the Local Plan** which relate to traffic impact/transport assessments, car parking standards, cycle parking, encouraging walking have been considered. **Policy CC7** sets out the requirements for all new developments to provide suitable facilities for the management of waste. **Planning SPD (2018) Key Principles WM1, WM2, WM7 and WM11** are also applicable which seek off-street servicing for all new developments.
- 10.5 The following transport reports have been submitted in relation this application:
- Transport Assessment
 - Transport Assessment Addendum
 - Framework Travel Plan
 - Servicing and Delivery Management Plan
 - Construction Management Plan
 - Student Management Plan

Site Accessibility

- 10.6 The application site is located on the corner of Wood Lane and Shinfield Street, known as Plot A within the wider Imperial College London masterplan development site. Wood Lane is classified as an 'A' road, the A219, forming part of the London Distributor Road network maintained by the borough.
- 10.7 It is noted that Plot A has a Public Transport Accessibility Level (PTAL) rating of 2. However, Plot A is located on the edge of an area classified as 6a 'excellent', which includes several of the other Plots within the wider masterplan site area.
- 10.8 In response to this PTAL rating, the applicant has undertaken a manual assessment for the PTAL rating, which is a recognised alternative. The manual assessment identifies that the site can be assigned a PTAL rating of 6a 'excellent'. This reflects the sites proximity to public transport networks, service availability and walking time to public transport, with numerous bus routes accessed on Wood Lane and White City and Wood Lane London Underground stations, within reasonable walking distance.

Access

- 10.9 Vehicle access to the site would be via Wood Lane, from the improved all movements access to be constructed as part of the wider Imperial London College masterplan access strategy once Plot A and G are completed. Security measures would be provided as part of the development to control vehicle access to prevent unauthorised entry and to retain as much of the 'pedestrian-led' environment as possible.
- 10.10 Vehicles accessing Plot A will be directed to this main access point, which serves the wider masterplan site. Servicing and delivery vehicles for Plot A would be directed to the rear (eastern) boundary of Plot A, within 30metres of the site access, along the shared vehicle route with Plot B, to gain access to the loading bay to the rear of the plot. This access strategy is in line with the previous 2020 approval.
- 10.11 Pedestrian and cycle access would also be available from Shinfield Street providing a northern connection into the site, via a new public realm space, which would be shared with the servicing and delivery landing bay.
- 10.12 Two Blue Badge parking bays are to be provided adjacent to the proposed student accommodation block, in addition to the wider site Blue Badge parking bays serving the wider masterplan. The two parking spaces are not incorporated within the Plot A redline planning boundary, and as such would need to be secured through the S106 agreement to ensure the spaces are provided solely for use by holders of a valid Blue Badge connected to the student accommodation.

Trip Generation

- 10.13 In order to assess the relative change in travel demand from the previously approved office use to the proposed student accommodation in this application, an updated Transport Assessment has been submitted. The TA

includes a revised trip rate calculation, comparing the previous office development, with the proposed student accommodation and smaller office component, the subject of this planning consideration.

- 10.14 For the previous consented use, for the office block, a multi-modal assessment was presented based on trip rates within the TRICS database. The trip generation for the consented scheme can be seen below, within Table 6.1 extracted from the TA.

Table 6.1: Plot A – Consented Scheme Trip Generation

Mode	AM Peak			PM Peak			Daily		
	In	Out	Total	In	Out	Total	In	Out	Total
National Rail / London Underground	68	17	85	21	81	102	602	541	1,143
Bus, minibus or coach	15	5	20	6	19	25	146	132	278
Taxi	2	0	2	0	2	3	17	15	32
Motorcycle, scooter or moped	1	0	1	0	1	1	9	8	16
Driving a car or van	1	0	1	0	1	1	9	8	16
Passenger in a car or van	0	0	0	0	0	0	0	0	0
Bicycle	9	2	11	3	10	13	77	70	147
On foot	122	97	218	155	172	327	1754	1704	3458
Other	0	0	0	0	0	0	0	0	0
Total	218	121	338	185	286	472	2,614	2,477	5,091

- 10.15 This analysis sets out that on a daily basis, the previous consented office use had the potential to generate around 5,000 two-way total trips. In the AM peak would have equated to 338 two-way trips and in the PM peak this equated to 472 two-way trips.
- 10.16 Taking into account the car-free/car lite nature of the consented scheme, with only essential Blue Badge car parking available on-site, the overall modal split for sustainable modes of travel was indicated as 92%, including 32% undertaken by London Underground, 25% by London Buses and 6% by National Rail.
- 10.17 In order to determine the estimated trip generation for the proposed development, the TRICS database was again interrogated for residential student accommodation, within a PTAL 6a area.
- 10.18 The original TA sets out that two sites were selected from TRICS to inform the revised trip generation travel demand profile, connected to the proposed 212 units. It is recognised that the trip generation submitted in the original TA was based on the first submission and that the number of units being sought has been increased to 216 units in total in the revised proposals.

10.19 Table 6.5 is the direct comparison connected to the student accommodation, extracted from the TA.

Table 6.5: Student Accommodation

Mode	AM Peak			PM Peak			Daily		
	In	Out	Total	In	Out	Total	In	Out	Total
Underground, metro, light rail, tram	1	6	7	5	3	8	45	49	94
National Rail	0	1	1	1	1	2	8	9	18
Bus, minibus or coach	1	5	5	4	2	6	35	38	73
Taxi	0	1	1	1	0	1	7	8	15
Motorcycle, scooter or moped	0	0	0	0	0	0	1	2	3
Driving a car or van	0	0	0	0	0	0	1	2	3
Passenger in a car or van	0	0	0	0	0	0	1	2	3
Bicycle	0	2	2	1	1	2	11	12	23
On foot	0	4	4	3	2	5	29	32	61
Other	0	0	0	0	0	0	0	0	0
Total	2	19	21	16	9	25	140	153	293

10.20 In recognition that this trip generation profile was based originally based on a 212-unit scheme, a Transport Addendum was submitted to determine the change in numbers as a result of the proposed 216 units. This analysis is set out in the Transport Addendum and identifies six additional two-way total trips could be generated over a day.

10.21 A comparison of Table 6.1 and Table 6.5 (extracted from the TA) identifies that the proposed student accommodation would result in an overall reduction of total two-way trips in comparison to the consented office development, with 21 two-way trips identified at the AM peak and 25 two-way trips identified at the PM peak.

10.22 In addition to the student accommodation, a smaller element of office use is proposed within Plot A, the TA assessed the trip generation connected to a flexible Class E land use. Table 6.7 extracted from the TA identified that a flexible Class E use could generate an additional 101 two-way total daily trips.

Table 6.7: Flexible Class E Uses (presumed B1 Office Use)

Mode	AM Peak			PM Peak			Daily		
	In	Out	Total	In	Out	Total	In	Out	Total
Underground, metro, light rail, tram	2	0	3	0	2	3	17	15	32
National Rail	0	0	0	0	0	1	3	3	6
Bus, minibus or coach	2	0	2	0	2	2	13	12	25
Taxi	0	0	0	0	0	0	3	2	5
Motorcycle, scooter or moped	0	0	0	0	0	0	1	0	1
Driving a car or van	0	0	0	0	0	0	1	0	1
Passenger in a car or van	0	0	0	0	0	0	1	0	1
Bicycle	1	0	1	0	1	1	4	4	8
On foot	1	0	2	0	2	2	11	10	21
Other	0	0	0	0	0	0	0	0	0
Total	7	1	8	1	8	9	54	47	101

10.23 Taking into account both the student accommodation and flexible Class E land use, the combined revised trip generation for the proposed development can be seen in Table 6.8, extracted from the TA.

Table 6.8: Total Trip Generation – Proposed Development

Mode	AM Peak			PM Peak			Daily		
	In	Out	Total	In	Out	Total	In	Out	Total
Underground, metro, light rail, tram	3	6	9	6	5	11	62	64	126
National Rail	1	1	2	1	1	2	12	12	24
Bus, minibus or coach	2	5	7	4	4	9	49	50	98
Taxi	0	1	1	1	1	2	10	10	20
Motorcycle, scooter or moped	0	0	0	0	0	0	2	2	4
Driving a car or van	0	0	0	0	0	0	2	2	4
Passenger in a car or van	0	0	0	0	0	0	2	2	4
Bicycle	1	2	2	1	1	3	16	16	32
On foot	2	4	6	4	4	7	41	42	83
Other	0	0	0	0	0	0	0	0	0
Total	9	20	29	17	17	34	194	200	394

- 10.24 The same mode split analysis has been assumed to apply to the student accommodation, therefore the site continues to identify that 92% of all trips will be undertaken by sustainable modes of travel.
- 10.25 A total of 394 total daily two-way trips are anticipated to be generated by the combined student accommodation and flexible Class E land use.
- 10.26 The majority of these trips will be undertaken by sustainable/public transport (63%) and active travel (29%). It is anticipated that 150 total trips would be undertaken by rail/underground and around 98 total trips would be undertaken by bus.
- 10.27 In comparison to the consented office development, this represents a net reduction of around 4,500 total trips of a daily basis.
- 10.28 Aside from servicing, most of the vehicular trips to the site are likely to be by taxi (and private hire vehicles). The trip generation assessment considers that a total of 20 taxi trips (5% of the total trips) would be generated by the development on a typical day. The analysis does not take account of student moving in or moving out days when the number of vehicles trips would be higher in association with students accessing the accommodation block at the beginning and end of term. Consideration of the impact of these trips and how they would be managed is set out within the separate Student Management Plan.

Walking

- 10.29 The TA includes an Active Travel Zone Assessment, directed at Healthy Street measures and cover two routes:
- Route one, westbound, connecting Plot A with the Hammersmith Hospital along Du Cane Road.
 - Route two, southbound, connecting Plot A with Shepherds Bush along Wood Lane.
- 10.30 The S106 agreement signed in 2020 included a Highways Contribution of £250,000 and a Cycle Contribution of £20,000 and could be used towards the enhancements of Healthy Streets. A review has been undertaken of the proposed mitigation measures identified in the ATZ in comparison with the mitigation measures that were secured within the existing Section 106 agreement for this plot for an alternative use.
- 10.31 This comparison has identified that additional mitigation measures will be required for the proposed uses to be secured in connection to this proposed development, in recognition of improvements that will need to be made to the wider highway and public realm since the previous scheme was approved in 2020 to support active travel amongst the proposed site occupants.
- 10.32 The proposed development aims to increase pedestrian and cycle permeability into the site by providing improvements to the public realm along the north, south and western boundaries. The existing connection from

Shinfield Street is proposed to be enhanced via the public realm improvements, making access into the site from this boundary more open.

Cycling

- 10.33 The **London Plan Policy T5** (including the London Cycling Design Standards) and **Local Plan Policy T2** seeks to develop and promote a safe environment for cyclists across the borough to encourage future residents and businesses to consider these modes. **Local Plan Policy T3** seeks to increase and promote opportunities for cycling through the provision of convenient, accessible, safe and secure cycle parking within the boundary of the site. Appendix 8 of the Local Plan seeks to ensure that satisfactory cycle parking is provided for all developments.
- 10.34 The TA and Transport Addendum sets out the cycle parking for the proposed development. Provision is made for 198 cycle spaces (170 long-stay and 26 short-stay). All 198 cycle spaces are provided at ground floor level, in a mixture of two-tier stands and Sheffield stands. A dedicated internal cycle area will provide the two-tier stands and 26 short-stay Sheffield stands are provided within the public realm space close to Shinfield Street and the cycle store area. Provision has been made for four Sheffield type stands to accommodate larger cycles within the cycle store area. Long and short stay cycle parking would meet London Plan standards in accordance with London Plan policy T5.
- 10.35 Provision of the cycle parking provision would be secured by a planning condition. The condition will also secure the large Sheffield stands to ensure compliance with the London Cycle Design Standards (LCDS), for a minimum of 5% accessible cycle parking.

Car Parking, Blue Badge spaces and Taxi Parking Demand

- 10.36 **London Plan Policy T6, T6.1, T6.4 and T6.5** state that proposals should encourage the reduction in the need to travel, especially by car. The London Plan sets no maximum car parking standards, but notes that in PTAL 4-6 areas, on-site car parking should be limited to operational needs, parking for disabled people and the needs for servicing as necessary.
- 10.37 The proposed development would result in the removal of the temporary surface car park which has capacity for around 35 car parking spaces, which served as car parking for essential staff connected to Imperial College London. As part of the original wider masterplan for this site, provision was made for an underground car park, within Central Square. The previous permission for Buildings A and G included the removal of the consented basement car park for 123 cars; and the provision of blue badge only (at grade) parking bays, two per building. A total of 22 disabled parking bays would be provided across the masterplan in accordance with the consented scheme. Officers therefore consider the proposals retain the wider policy objectives of providing car-free development whilst ensuring adequate parking facilities for users of accessible bays.

- 10.38 Two accessible parking bays, accessed from Wood Lane, are to be provided in line with the masterplan permission. The two spaces would be sited outside the redline of this proposal, in space between Plot A and the Grad Pad block. The two spaces would be managed by the on-site management team alongside the site-wide accessible parking provided on the campus, to ensure the spaces can be accessed by those who need them. The Applicant adds that the maximum distance from the front door to the accessible units are 82m, excluding vertical travel. The two blue badge spaces would be secured by the S106 Agreement.
- 10.39 Taking the above into consideration, Plot A is concluded as being offered as 100% car-free, based on the position that no car parking is proposed within the planning redline boundary. Any permission would include a 'permit free agreement' secured through the S106 Agreement.
- 10.40 The Transport Addendum refers to an on-site car park management strategy, to reflect that this Plot is 100% car-free. A car parking management plan (CPMP) will be sought as a planning obligation for Plot A, recognising that this is located within the wider masterplan site. The CPMP will be required to set out the management of all the Blue Badge spaces across the entire campus and how these will be allocated and managed in relation to specific plots. The CPMP will also be required to cover how taxi's will be managed in connection to the wider site operations.
- 10.41 Plot A is located within Controlled Parking Zone (CPZ) area 'NN' that restricts car parking on-street during the day, between 0900-1700 Monday to Saturday and opposite area 'N', which operates under similar restrictions. The nearest car club bay (Zipcar) is located on Oxford Gardens approximately 1.1 kilometres (14 minutes' walk) to the east of the site.
- 10.42 Given the potential for the proposed development to have an impact on the existing CPZ, a review of the CPZ mitigation measures secured under in the last S106 agreement will be captured. A further contribution to ensure that this covers the proposed new student accommodation block coming forward will be secured through the S106 agreement.

Framework Travel Plan

- 10.43 A Framework Travel Plan (FTP) has been submitted alongside the Transport Assessment and Transport Addendum and Student Management Plan in line with London Plan policy T4. A final FTP document would be secured through the Section 106 agreement, as an obligation with a monitoring fee of £5,000 on Years 1, 3 and 5 for both the student accommodation and the ground floor commercial use, following the first occupation of the relevant part of the building. The FTP sets out the key objectives and measures to be incorporated in a final full Travel Plan which would aim to target the shared living accommodation connected to the students. The travel patterns of employees and students influenced by the car-free nature of the development and the impact of employees currently not be covered by this FTP will need to be revised.

- 10.44 A full Travel Plan would also need to incorporate, site wider measures such as:
- Consideration of the number of taxi spaces to support the site.
 - Improvements to the frequency and routing of the 'shuttle' bus service to reflect the proposed increase in student numbers on-site and how would future improvements to the shuttle service be funded.
 - Details including costs for appointing a Travel Plan Coordinator over the lifespan of the Travel Plan to ensure these measures are deliverable.
- 10.45 A series of specific measures connected to the student accommodation, should also be undertaken in an updated full travel plan.
- Options to enable increased cycle parking provision to be provided if identified over the lifespan of the Travel Plan
 - Installation of 'live' stream transport information boards within the foyer areas for the student accommodation
 - Any associated website to include a dedicated page on travel and accessibility information relating to the site
 - Subsidised options for students to obtain an Oyster card/or similar, and
 - What measures have been included to enable bike repair to be undertaken within the cycle store.

Student Management Plan

- 10.46 A Student Management Plan (SMP) has been submitted as Appendix D of the TA. This is noted as a draft document. The final SMP will need to be updated to reflect the 216 student units. There are a number of aspects being put forward as part of the student management plan which cover the wider masterplan.
- 10.47 Further information will be required to identify how student arrival/departures periods at the beginning and end of term would be managed and if car parking spaces within the campus, taking into account the existing student rooms provided in the GradPad building and how these will be made available to enable students to book, if arriving by car or if alternative arrangement will be provided within the boundaries of the wider campus site. Specific details in a final SMP will also need to be included, to cover the following:
- Contact details of the company and named person responsible for the management of Plot A and the associated Student Management Plan.
 - That waste collection bins are presented for collection, on the collection day and returned to the waste store area and not left out within the public realm space.
 - A designated person is always available to ensure that large vehicles can be guided into the loading pad area, this should be the same person identified within the Servicing and Delivery Plan, for consistency.
 - The named on-site person should also be responsible for maintaining the area around Plot A, to prevent waste being left out within the public realm space blocking routes through the site.
 - If different from the above, the contact details and name of the person responsible for the co-ordination of student arrival and departures should be included within a final SMP.

- The SMP needs to set out the extent of management / enforcement responsibility. Details on how the arrivals and departures will be enforced and length of booked slots if longer than the assigned 20mins.
- A commitment that the SMP will be secured in perpetuity should also be given by the applicant.

10.48 For this reason, officers recommended the SMP be secured as a planning obligation rather than condition. The SMP should be prepared in conjunction with the requested Car Parking Management Plan (CPMP) to ensure that these two management documents, which cover the wider masterplan site, are aligned with each other.

Waste Management Plan and Servicing and Delivery Plan

- 10.49 The **London Plan policy T7 and Local Plan policy CC7** seek that all developments have suitable, off-street, facilities to manage servicing and waste generated by the development. The London Plan policy T7 and Planning Guidance SPD principle TR27, sets out that adequate space servicing, storage and deliveries should be made off-street.
- 10.50 The applicant has submitted a Delivery and Servicing Plan (DSP), as Appendix G of the TA. This details that a new waste store would be provided at ground floor in the north-east corner of the Plot.
- 10.51 All waste, servicing and deliveries for the proposed building being is proposed from the loading bay adjacent to Plot A on the eastern boundary, shared with the public realm space. The loading bay location has been maintained as per the previous permission for office use. This would now be used for all waste collection, servicing and deliveries connected with both the student accommodation and flexible Class E land use. The loading bay has been designed to accommodate one large vehicle (12m). The assessment has been detailed that up to 14 delivery and servicing trips could be generated on a daily basis. The external levels in the service area are set lower to assist with providing a pedestrian/cycle access from Shinfield Street through the campus to allow pedestrians and cyclists to manoeuvre around the loading bay.
- 10.52 An updated DSP will need to set out a clear management strategy around how all vehicles' movements will be marshalled, along the secondary vehicle route in recognition of the length and complexity of the reversing movement required to access the loading bay, within the public realm space.
- 10.53 Officers recommend that a final DSP be secured within the Section 106 agreement as an obligation, as elements set out in the DSP are outside the application site, including the vehicle access route from the main access, the secondary vehicle access between Plot A and Plot B and the booking/scheduling system with is indicated as being part of the wider masterplan site management approach.
- 10.54 An updated DSP will require a commitment to prevent delivery/servicing of the site via residential streets (Shinfield Street), details on how the loading pad

and secondary vehicle route will be managed and what opportunities have been taken to promote consolidation of deliveries and servicing as part of the wider masterplan site, to reduce vehicle arrivals and departures for Plot A and the contact details of the person who will be responsible for the DSP.

- 10.55 Reference is made to the Travel Plan Coordinator as being responsible for the DSP, along the security team. Confirmation of the final roles, responsibilities, contact details and the person responsible for management of the documents to be secured as obligations for this plot in respect to: DSP, SMP, CPMP and FTP.

Construction Logistics Plan

- 10.56 The **London Plan Policy T7 and Local Plan Policy T7** seek that all developments prepare a Construction Management Plan to manage the construction impacts and ensure the smooth operation of the highway network.
- 10.57 The applicant has submitted a draft Construction Traffic Management Plan (CTMP), as Appendix H of the TA. The CTMP at this stage identifies preliminary proposals to manage construction. A final CLP will be required to provide a greater level of detail covering construction processes, details regarding environmental and amenity impacts and associated mitigation measures, site logistics plan, traffic management (to cover a cumulative approach), vehicle routing, health and safety and community liaison meetings.
- 10.58 The approval of a final CMP/CLP ahead of the commencement of the development will be secured by conditions to ensure the construction works will minimise the likelihood of congestion during the construction phase, including the monitoring and control of vehicles entering and exiting the site will be undertaken (reference made to CLOCS and FORS), the vehicle routing and how workers will travel to and from the site.
- 10.59 A final CLP will be expected to include the proposed vehicle routes to the site agreed with the Council and TfL, cumulative considerations around delivery times and agreements in place with contractors already on-site and contractors that may be operating in close proximity to the site in order regulate deliveries and eliminate bottlenecks and construction vehicles stopping/waiting on the surrounding highway network seeking access to the site. The final CLP will also need to include details relating to the impact and possible relocation of the existing bus stop outside the site on Wood Lane (southbound route).
- 10.60 The CLP will need to be fully finalised and developed to comply with the TfL Construction Logistics Plan (CLP) guidance, which seeks to minimise the impact of construction traffic on unsuitable roads and restrict construction trips to off-peak hours only. The final CLP would be secured as an obligation, with a monitoring fee of £3,000.

10.61 Subject to the submission of the updated documents secured by condition or obligation and the mitigation measures required for the development by way of an updated legal agreement, officers consider that the proposed development would be acceptable and in accordance with London Plan policies T6, T6.1, T6.4 and T6.5 and Local Plan policies T3, T4, T5, T7 and CC7.

11.0 ENVIRONMENTAL CONSIDERATIONS

11.1 The following environmental impacts have been assessed and documents submitted supporting planning application.

- Flood Risk and Drainage
- Energy and Sustainability
- Air Quality
- Ground Contamination
- Noise and Vibration
- Light Pollution
- Archaeology
- Arboriculture, Ecology and Biodiversity
- Wind Microclimate

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

Flood Risk

11.3 **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.

11.4 **London Plan Policies SI 12 (Flood risk management) and SI 13 (Sustainable drainage)** outline strategic objectives in relation to flood risk management and sustainable drainage. **Local Plan Policy CC2** requires major developments to implement sustainable design and construction measures, including making the most efficient use of water. **Local Plan Policies CC3 (Minimising Flood Risk and Reducing Water Use) and CC4 Minimising Surface Water Run-Off with Sustainable Drainage Systems)** contain similar requirements designed to assess and mitigate against the risk of flooding and integrate surface water drainage measures into development proposals.

11.5 In compliance with the requirement of Local Plan Policy CC3, a Flood Risk Assessment (FRA) and Drainage Strategy (8 November 2022) have been prepared and are included with the application. It is noted that layout amendments to the proposal did not affect FRA and the same document was re-submitted in July 2023. The site is located within the Environment Agency's Flood Zone 1 which indicates a 'very low' risk to surface water flooding from the Thames. There is no basement level proposed, so groundwater and internal sewer flood risks are also considered low. In case of a major storm event there is a risk of surface flooding, however mitigation measures are

proposed through the implementation of a surface water management and SuDS measures.

11.6 The development of this plot forms part of the phase works over the wider Imperial College site. As a result of this, site wide measures have previously been designed, approved and installed that this phase of development is intended to connect into. The FRA confirms that the development will not impact on the discharge rates for the wider Imperial campus scheme.

11.7 Thames Water raise no objection to the proposal subject to conditions/informatives. The Environment Agency have not commented on the proposal.

Drainage

11.8 A Sustainable Drainage System (SuDS) and Foul Water Strategy has been prepared in support of this planning application. A range of SuDS measures are proposed across the site to reduce flood risk. The foul water strategy includes two pipe runs passing below the footprint of the proposed building to serve all foul water drops internally. The design would be further developed at a later stage. It is proposed to discharge foul water into the Thames Water combined sewer in Wood Lane. Thames Water have confirmed capacity within the sewer for the proposed development via a pre-planning application.

11.9 Plot A is one part of a large, phased development comprised of numerous different plots on the Imperial College White City site. A previous planning application was submitted and approved for the developments of Plots A and G (ref: 2018/01234/FUL) including associated hardstanding and landscaping. A Drainage Strategy report was written by Curtins in support of application 2018/01234/FUL, and following approval has been under construction. The revised Plot A development is proposed to connect to the fully approved and partially constructed below ground surface water network with attenuation and flow restrictions installed. The combined discharge rates for the two sites are set at 42l/s and this is not proposed to increase because of this application. In addition, the attenuation provision already provided is sufficient for both plots for events up to and including the 1 in 100 year +40%CC event and as such no increase in below ground storage is required. Additional drainage measures will be introduced as part of the proposed drainage design for the Plot A building. The measures include 813.2m² of green roof, comprising 486.8m² of intensive green roof and 326.4m² of a wildflower grass green roof. These measures aim to slow the time of entry to the network, enhance water quality and biodiversity and improve amenity. The proposed drainage will provide a betterment of 89.8% reduction in the discharge rate from the site when compared with the existing uncontrolled run-off rate. Infiltration to the ground has not been deemed suitable for this site. This approach is acceptable and, overall, considering the site circumstances and constraints, the proposals comply with the drainage hierarchy and are in accordance with London Plan Policy SI12.

11.10 Although the proposals are considered acceptable in principle, officers consider that some elements of the proposals require some further detailed

design work. The SuDS features will include green and brown roofs and use of landscaped based features such as tree pits and other features to minimise reliance on the attenuation tank that is implemented in Plot G.

- 11.11 Subject to the inclusion of conditions requiring the submission of a Surface Water Drainage Strategy and an updated Flood Risk Assessment officers consider that the proposed approach would be acceptable and in accordance with Policies SI 12 and SI 14 of the London Plan and Policies CC3 and CC4 of the Local Plan requiring flood risk assessment and development to mitigate future flood risk.

Energy and Sustainability

- 11.12 **London Plan Policies SI 2 (Minimising greenhouse gas emissions), SI 3 (Energy infrastructure), SI 4 (Managing heat risk)** require development proposals should minimise carbon dioxide emissions and exhibit the highest standards of sustainable design and construction, they should provide on-site renewable energy generation and boroughs should seek to create decentralised energy network.
- 11.13 **Policies SI 2 and SI 3** set out how new development should be sustainable and energy saving. **Policy SI 2** 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.
- 11.14 **Policy SI 3** states that within Heat Network Priority Areas, which includes the site, major development proposals should have communal low-temperature heating systems in accordance with the following hierarchy:
- a). Connect to local existing or planned heat networks.
 - b). Use zero-emission or local secondary heat sources (in conjunction with heat pump, if required)
 - c). Use low-emission combined heat and power (CHP) (only where there is a case for CHP to enable the delivery of an area-wide heat network, meet the development's electricity demand and provide demand response to the local electricity network)
 - d). Use ultra-low NOx gas boilers.
- 11.15 **Policy SI 4** requires development proposals to minimise adverse impacts on the urban heat island through design, layout, orientation, materials, and the incorporation of green infrastructure. This should be demonstrated by following the cooling hierarchy along with an assessment using The Chartered

Institution of Building Services Engineers (CIBSE) guidance on assessing and mitigating overheating risk in new developments, using TM59 and TM52 for domestic and non-domestic developments, respectively.

- 11.16 **Local Plan Policy CC1 (Reducing Carbon Dioxide Emissions)** requires all major developments to implement energy conservation measures with a view to reducing carbon dioxide emissions. The policy, however, refers to the previous version of the London Plan and as such has been partly superseded by the more up to date requirements contained in the new London Plan. **Local Plan Policy CC2 (Sustainable Design and Construction)** seeks to ensure the implementation of sustainable design and construction measures by implementing the London Plan sustainable design and construction policies.
- 11.17 An Energy Strategy dated 10 November 2022 was initially provided with the application as required. Following revisions to the scheme, an Energy Strategy Addendum dated 26 May 2023 was submitted. As the scheme is a major development, the proposals are required to comply with the London Plan's zero carbon requirement. The Energy Assessment sets out how efficiency and low/zero emission technologies are proposed be integrated to reduce the new development's CO₂ emissions. The statements set out that the proposals would integrate the following sustainability measures within the scheme.
- 11.18 The London Plan Energy Hierarchy has been used to guide the design to minimise energy use and reduce associated CO₂ emissions. Energy efficiency measures have been integrated to make use of natural daylight and solar gain where possible and high levels of airtightness have been provided. Renewable energy will be used on-site in the form of Air Source Heat Pumps (ASHPs) to provide heating and hot water. Inclusion of PV panels has been considered but space within the development is limited and the roof areas which could be designed for PV installations would be occupied by the Heat Pumps, green roofs or student amenity space. In addition, roof areas on the upper floors would be overshadowed by the adjacent 35-storey residential tower in Plot F. Constraints would also apply to the lower roof levels due to the stepped arrangement of the proposed building with the tallest element at the southern end and PV's would also have an adverse visual impact on the lower roof levels. The Mayor requested that an overshadowing study be provided to demonstrate that installing photovoltaic across the development is not available nor viable. An Overshadowing Study has been provided which confirms this option is not feasible for this building.
- 11.19 With regards to the separate London Plan requirement to reduce CO₂ emissions by 15% through energy efficiency measures alone, the proposal falls short of this target, achieving a 11.7% target. The Energy Strategy explains that the building fabric and systems have been maximised and despite exploring additional opportunities to improve energy efficiency through passive measures, it has not been possible to reach the 15% improvement target for non-residential uses. This is due to the high hot water load requirement of the proposed 216 student rooms which negatively impacts the

carbon reductions at the Be Lean Stage. The Applicant adds the scheme has been designed to be as energy efficient as possible given the site's limitations, through passive means as well as the inclusion of the Air Source Heat Pumps (ASHPs). However, given the site constraints, it would not be possible to achieve a viable and deliverable scheme and hit the 15% improvement target. Officers consider that the justifications provided for the shortfall of meeting the GLA's required energy efficiency target for the non-residential element of the proposal is reasonable and in the wider context of the proposal and the overall performance of the whole scheme in terms of CO2 reduction, considers it acceptable on this occasion. Details of the energy efficiency measures would be subject to condition to ensure all possible improvements are incorporated in the final building design.

- 11.20 Consideration has been given to connecting into nearby heat networks. There is an existing operational CHP based District Heat Network (DHN) within the White City Campus North masterplan, operated by Imperial College London (ICL). Heating and cooling for the remaining building on the campus will however rely solely on Air Source Heat Pumps (ASHPs), as renewable low carbon technology has developed. The applicant is not proposing to connect the proposed building to the existing ICL DHN at this point of time due to the impact on carbon emissions and air quality and because there is currently no decarbonisation plan in place for this DHN. This means a connection of the proposed ASHP system to the ICL DHN would not be technically feasible at this stage due to compatibility issues. It is noted that there are two others proposed DHN's in the area: the Hammersmith & Fulham and the White City DHN. GLA officers recommend that the applicant should investigate methods of connecting the proposed ASHP system to the masterplan ICL DHN to help with the decarbonisation of this network. The Applicant has advised this is currently not technically possible. The applicant has committed to the provision of a two-way connection within the proposed building design to incorporate a connection to either the existing ICL DHN or either of these two proposed DHNs should this be possible in the future. This is a welcomed approach and would be secured through the S106 Agreement.
- 11.21 Overheating risks have been assessed which shows that passive design measures can minimise overheating risk to a degree, but due to site constraints and orientation they are not able to fully meet all requirements. There may be occasions when natural ventilation openings must remain closed for noise, pollution, or other reasons when a centralised air handling unit will be able to prevent summertime overheating. Tempered air will be provided via the MVHR units to mitigate studio overheating. The tempered air solution works alongside the MVHR by cooling the air to 18°C before supplying it into the space. If the outside air is cooler than 16°C, then it will supply the outside air without further cooling. This is considered an energy efficient way of reducing indoor temperatures by mechanical means.
- 11.22 Overall, the proposed carbon reduction measures are calculated to reduce CO2 emissions by 69.4% through on-site measures. This meets the minimum requirement of 35% set in the London Plan for major schemes and exceeds the new benchmark figure of a 50% reduction recently adopted by the GLA.

- 11.23 Whilst the overall reduction in CO₂ emissions meet the minimum on-site requirement for carbon reductions, it still falls short of achieving the zero-carbon target in the London Plan. As such, a carbon offset payment is required to be secured. This is calculated based on a net-zero carbon target for both domestic and non-domestic element using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The policy confirms that the section 106 can be used to secure this payment as well as a post completion Energy Strategy review to ensure that the target emissions are achieved or improved upon. A carbon offset payment of £177,317 has been estimated and this carbon offset payment to mitigate the impact would be secured via S106 agreement contribution. The final contribution calculation will be subject to the outcome of a revised Energy Strategy secured by a condition.
- 11.24 In broad terms, the approach is acceptable in energy policy and CO₂ reduction terms although there may be scope to revise the approach with regards to onsite energy generation.

Sustainability

- 11.25 As required of a major development; a Sustainability Statement has been provided with the application. The sustainability statement identifies the key planning policies in relation to sustainable design and construction set out in the Local Plan and the London Plan. The sustainability measures that will be designed in include water efficiency, waste management and recycling facilities, use of building materials with low environmental impacts where possible, including recycled materials where feasible, inclusion of measures to minimise noise pollution and air quality impacts, flood risk and sustainable drainage measures (see separate comments), sustainable transport measures and biodiversity improvements.
- 11.26 A BREEAM Multi-Residential Assessment has being undertaken applicable to the Student Residential element (majority) of the scheme. The commercial element is less than 500m² so has not been assessed directly under a standalone assessment but will benefit from the site wide features from the multi-residential assessment. The sustainability statement has committed the development to meeting a BREEAM 'Excellent' rating. The current anticipated baseline score is 73.90%, equivalent to a BREEAM 'Excellent' rating, with a difference between the minimum required score for a BREEAM 'Excellent' rating of 70% of 3.90%.
- 11.27 A condition will require submission of a post-construction certificate to demonstrate that a rating of 'Excellent' has been achieved.

Whole Life Carbon

- 11.28 As the proposed development is GLA referable a Circular Economy Statement and Whole-Life Cycle Carbon Assessment have been provided in accordance with London Plan Policy SI 7.

11.29 A Whole Life-cycle Carbon Assessment has been undertaken in accordance with the London Plan, which considers the draft GLA Guidance (2020). This reviews the embodied carbon emissions associated with the proposed development, considering the materials quantities and loads, the operational energy consumption of the built scheme, with total emissions estimated and compared to the GLA benchmarks. The report outlines a range of opportunities which could be undertaken to reduce the carbon associated with the development at the more detailed design stage when materials are being selected and specified. The GLA have requested that a further review should be secured through a pre-commencement condition and a post-construction monitoring report should also be secured by condition.

Circular Economy

11.30 A Circular Economy Statement has been submitted which takes into account the GLA's draft guidance (2020) and outlines how circular economy principles will be incorporated in the design, construction and management of the proposed development, including through minimising materials use and the sourcing and specification of materials; minimising and designing out waste at various stages; and by promoting re-usability, adaptability, flexibility and longevity. This is supported and complies with London Plan Policy SI7. The GLA have requested that a post-construction report be provided with further details secured via a planning condition.

11.31 Officers consider the proposed energy and sustainability strategies align with the latest requirements of the London Plan. It is recommended that the implementation of the measures outlined in the Energy Strategy and Sustainability Assessment be conditioned.

11.32 Officers therefore consider that subject to conditions, the proposed development accords with Policies London Plan Policies SI 2, SI 3 and SI 4 and Policies CC1, CC2 and CC7 of the Local Plan.

Air Quality

11.33 **London Plan Policy SI 1 (Improving air quality)**, supported by the Mayor's Control of Dust and Emissions during Construction and Demolition SPG (July 2014), provides strategic policy guidance on avoiding a further deterioration of existing poor air quality. All developments will be expected to achieve Air Quality Neutral status with larger scale development proposals subject to EIA encouraged to achieve an air quality positive approach.

11.34 Local **Plan Policy CC10 (Air Quality)**, states that the Council will seek to reduce the potential adverse air quality impacts of new developments through a range of policy measures.

11.35 An Air quality report dated 4 November 2022 was submitted with the application as required and assesses the likely impact of the construction works and operational stages on local air quality and its subsequent effect on sensitive receptors.

- 11.36 The site is located adjacent to nearby emissions sources (i.e., Wood Lane (A219) and the Westway (A40)). The development site is located within a borough wide Air Quality Management Area (AQMA), declared 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). Also sited within the 'Acton A40 North Acton rail/Gypsy Corner/Savoy Circus/White City' Air Quality Focus Area (AQFA), the Low Emissions Zone (LEZ) which currently charges Heavy Goods Vehicles (HGVs), Light Goods Vehicles (LGVs), buses / minibuses and coaches that do not meet Euro VI (NO_x and particulate matter (PM)) standards and the Ultra-Low Emissions Zone (ULEZ) following the recent expansion which took effect on the 29 August 2023. The ULEZ standards are Euro III (NO_x), Euro IV (NO_x) and Euro VI (NO_x and PM) standards.
- 11.37 The main effects are expected to take place during construction phase, related to dust deposition and emissions from construction vehicles and machinery on the site. Earthworks activities and emission magnitude associated with the construction works are expected to be medium. It is considered that the overall effect of development-generated construction traffic on nearby designated ecological sites is likely to be insignificant. The number of trips per year associated with the Proposed Development is 2,190 trips/yr. The Total Benchmark Trip Rate for the Proposed Development is 24,282 trips/yr. As such, the number of trips per year associated with the Proposed Development is less than the Total Benchmark Trip Rate and therefore the Proposed Development is considered Air Quality Neutral with regard to transport emissions during the demolition and construction phase. Any potential impacts associated with construction traffic would be temporary in nature, with the construction programme anticipated to have a maximum duration of approximately 18 months. With the inclusion of best practice mitigation measures, which include a Construction Environmental Management Plan (CEMP) and taking into consideration that construction vehicles are now expected to meet the more stringent Low Emission Zone (LEZ) emission standards (equivalent to the Ultra-Low Emission Zone (ULEZ) standards, the residual effects on all receptors are expected to be insignificant.
- 11.38 Once operational, the proposed development, is not expected to have a significant impact on local air. The development does not include any combustion plant and the results of the operational phase traffic screening assessment indicate that the trip generation associated with the proposed development is below the relevant criteria in the EPUK (Environmental Protection UK) and IAQM (Institute of Air Quality Management) guidance. The proposed energy strategy comprises ASHPs and would, therefore, not have any associated on-site building emissions. As such, the development would be better than 'air quality neutral' in terms of building emissions.
- 11.39 Design interventions are proposed to improve the internal air quality conditions for future residents of the student accommodation building. Due to the emissions from transportation sources, mitigation will be required in the form of additional ventilation for the proposed residential use on all floors. These

include the installation of NOx/NO2 filters to be fitted to the ventilation system servicing all residential units on all floors and an ongoing maintenance schedule will be established to maintain the filtration system. The mitigation approach would also consist of a mechanical ventilation plant located at roof level where concentrations are expected to be closer to background levels, which are below the annual mean AQO and WHO guideline which would ensure clean air intake. The annual mean AQO at the ground floor MVHR intakes at the rear of the building for non-residential areas, circa 40 metres away from Wood Lane is not expected to be exceeded in compliance with Part F of the Building Regulations (2021). This is considered acceptable and should be secured by condition.

- 11.40 Several conditions are recommended for various air quality control measures in relation to both construction and operational phases of the proposal. Conditions relating to ventilation strategy, low emissions, delivery and servicing plan and Zero Emissions Heating (Air Source Heat Pump) compliance would be secured by conditions to ensure compliance with Policy CC10 of the Local Plan. Subject to these conditions, the proposal would accord with Policy CC10 of the Local Plan and Policy SI 1 of the London Plan.

Ground Contamination

- 11.41 **London Plan Policy SD1** encourages the strategic remediation of contaminated land.
- 11.42 **Local Plan Policy CC9** ensures that no unacceptable risks are caused to humans, controlled waters, or the wider environment during and following the development works. 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.
- 11.43 A summary of previous geo-environmental assessments carried out in relation to White City North Campus – Plot A and Phase 2 Geo-Environmental assessment both dated 24 October 2022 were submitted with the application. Historically, a Phase 1 Desk Study and ground investigation works for the wider Imperial West site was prepared in October 2013 and approved (2013/04966/DET) as part of discharging Condition 73 attached to planning permission ref: 2013/02525/VAR, with the recommendation that only additional works would be required on a plot-by-plot basis, if there is insufficient information to derive a plot specific Remediation Strategy. Following the subsequent grant of planning permission ref: 2018/01234/FUL for development of Plots A and G, a Phase 2 Geo-environmental assessment (prepared by Curtins) was approved (ref: 2020/02985/DET) as part of discharging to Conditions 7 (Preliminary Risk Assessment) and 8 (Site Investigation Scheme) attached to the that planning permission.
- 11.44 Based on the information available to date, the overall risk for the redevelopment is considered low. Further detailed information is however

required for an acceptable Desk Study/Preliminary Risk Assessment to be considered acceptable as the currently submitted assessment relies on previous, historic desk study assessments that are at this stage considered outdated. Additional intrusive investigations might be required prior to the commencement of construction to further quantify the levels of contaminants and explore beneath the ground. If remediation is required, these details can be appropriately and reasonably secured by way of conditions.

- 11.45 In summary, the assessment of ground conditions and implementation of the recommendations conclude that the site poses a minimal risk of significant harm to potential end users of the site or the controlled waters environment. Further ground investigation would however be required to confirm this and allow geotechnical data to be gathered to inform construction of the development.
- 11.46 No objection is raised by the Council's Contaminated Land Officers to the proposed development or land uses subject to attaching the full set of contaminated land conditions/informatives to ensure an adequate desk study and preliminary risk assessment is completed and ensure the works are adequately undertaken in accordance with the old CLR11/new LCRM (land contamination risk management) requirements. Subject to the inclusion of the conditions, officers consider that the proposed development accords with Policy SD1 of the London Plan and Policy CC9 of the Local Plan.

Noise and Vibration

- 11.47 **London Plan Policy D14 (Noise)** sets out measures to reduce, manage and mitigate noise to improve health and quality of life.
- 11.48 **Local Plan Policy CC11** advises that noise and vibration impacts will be controlled by locating noise sensitive development in appropriate locations and protected against existing and proposed sources of noise through design, layout, and materials. Noise generating development will not be permitted if it would materially increase the noise experienced by occupants/users of existing or proposed noise sensitive areas in the vicinity. **Policy CC13** seeks to control pollution, including noise, and requires proposed developments to show that there would be 'no undue detriment to the general amenities enjoyed by existing surrounding occupiers of their properties'.
- 11.49 Environmental Noise Survey dated 4 November 2022 was submitted with the application. The Survey quantifies the existing ambient and background noise levels on the site in order to establish the design constraints on noise emissions from the operation of plant and outline proposed building façade acoustic performance. The existing baseline is heavily influenced by noise levels from traffic on the existing road networks.
- 11.50 The submitted noise assessment confirms that noise emission limits for fixed plant have been set in line with guidance in BS 4142:2014 and taking into account the requirements of LBHF. The proposed noise limits are set at 10 dB below the typical background noise level and aim to reduce the risk of disturbance to residents due to noise emitted from plant associated with the

development. The plant would be designed and attenuated to minimise disturbance at nearby residential properties. Plant and servicing during the operational phase would be conditioned to be below existing background noise levels and as such the long-term effect is likely to be of negligible to minor significance.

- 11.51 Consideration has been given to the impact of increase noise levels during the construction and operational phases of development. The cumulative impact of neighbouring construction works has also been taken into consideration. Receptors in various locations around the site have been identified, comprising predominantly existing residential properties. The impact on the living conditions of the proposed student occupiers have been assessed for the operational stage.
- 11.52 Works during the construction stages are anticipated to increase noise levels immediately adjacent to the site. However, these works would only be of a temporary nature only and short to medium term. Best practice measures are proposed to mitigate against noise and vibration. Measures proposed include controlling hours of working, using appropriate machinery and following best practice procedures. Advanced notifications and consultation of particularly noisy activities is considered beneficial, and procedures should be put in place for noise complaints to be addressed. These measures are indicated in the submitted Construction Traffic Management Plan and a final Construction Environmental Management Plan (CEMP) would be conditioned. With these measures in place, it is considered that the residual noise and vibration effects of the construction works on surrounding residents would range from Negligible to Minor Adverse.
- 11.53 The applicant's noise assessment states that the noise issues associated with the adjacent busy roads can be reduced to an acceptable level by using appropriately specified glazing and building fabrics, together with a suitable ventilation strategy, via mechanical heat and ventilation recovery. This would ensure that the overheating and noise criteria can be met, which would necessitate windows being closed during sleeping hours to achieve an appropriate internal acoustic environment during sleeping hours. This is acceptable and the proposed mitigation measures should be secured, in line with London Plan Policy D14.
- 11.54 Officers consider that the impacts for noise and vibration have been satisfactorily assessed. The proposed development is considered acceptable subject to mitigation measures including appropriate sound insulation between the ground floor commercial use and student accommodation on the upper floors, insulation and anti-vibration measures for machinery and plant and suitable noise level limits secured by conditions. Subject to the inclusion of conditions requiring the implementation of the submitted documents and submission of further information, officers consider that that residents of the proposed development and neighbouring occupiers would not experience any significant adverse noise or vibration impacts.
- 11.55 The environmental protection team have considered the proposals and raise

no objections subject to conditions regarding sound insulation, plant machinery and construction management. Subject to these conditions the proposals would accord with London Plan Policy D14 and Policies CC11 and CC13 of the Local Plan.

Light Pollution

- 11.56 **Local Plan Policy CC12 (Light Pollution)** seeks to control the adverse impacts of lighting arrangements including that from signage and other sources of illumination.
- 11.57 The proposal would comprise a residential led – student accommodation development. A condition would ensure that vertical external illumination of neighbouring premises from all external artificial lighting relating to the development shall be in accordance with the recommendations of the Institution of Lighting Professionals in the 'Guidance Note 01/21 for the reduction of obtrusive light 2021'. This would be secured by condition.
- 11.58 As such officers consider that the proposal accords with the requirements of Policies CC12 of the Local Plan 2018.

Archaeology

- 11.59 **London Plan Policy HC1 (Heritage conservation and growth)** states that new development should make provision for the protection of archaeological resources. Together with Policy DC1 of the Local Plan, **Policy DC8** sets out the principles for the conservation and protection of heritage in the borough. 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.
- 11.60 The site lies outside of an Archaeological Priority Area. Previous archaeological investigations for Imperial College Campus wider site concluded that there is a low archaeological potential, partly because of truncation and disturbance from recent developments.
- 11.61 Historic England's – The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to the borough and were consulted on the original and amended scheme. GLAAS agree with the findings of the assessment and confirm that no further archaeological work or condition is required in this instance.
- 11.62 Officers consider that the that the details submitted sufficient addresses the archaeological considerations and accords with the NPPF, Policy HC1 of the London Plan 2021 and Policy DC8 of the Local Plan 2018.

Arboriculture, Ecology and Biodiversity

- 11.63 The NPPF 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.

- 11.64 **London Plan 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. Higher standards of greening are expected of predominately residential developments (target score 0.4). **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.
- 11.65 **London Plan Policy G6** seeks to protect Sites of Importance for Nature Conservation (SINCs) and avoid harm. Where harm is unavoidable, this should be managed and mitigated to secure net biodiversity aim.
- 11.66 **Local Plan Policies OS1 and OS5** seeks to enhance biodiversity and green infrastructure in the borough 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. **Policy OS4** relates to nature conservation areas and green corridors and prevent harm to ecological (habitats and species) value from development.
- 11.67 The design of the public realm immediately surrounding Plot A incorporates the wider masterplan design strategy to maintain consistency across the site and underpin the place-making strategy. This includes the use of the same palettes of materials and street furniture, including paving, light columns, bins, seating, signage and a consistency in colours and textures. A range of urban greening measures are proposed. New trees are to be planted in steel planters and ground at the entrance level. The proposal includes intensive green roofs on two levels and a native wildflower extensive green roof at level 12 as well and to the lift overrun. The provision of an accessible roof terrace at level 9 necessitates a different approach to provide urban greening and promote biodiversity, with the numerous planters at varying heights instead proposed to support both tree planting and herbaceous planting, whilst still allowing for the provision of picnic tables, cantilevered benches (on the planters), tables and chairs as well as loose chairs to facilitate sitting out.
- 11.68 The proposed site development has been calculated as providing an Urban Greening Factor of 0.34. Almost 780 sqm of green roofs are added to the development (roof above Level 01, 03 and 06). The public realm surrounding

the building has however already been consented as part of a separate application. Due to the site constraints; access, building servicing, public footpaths and installed below ground utilities, this public realm is predominately hard surfacing and alternative design solutions compromise the usability of the site. The extent of hard surfacing within the redline boundary therefore affects the overall building score. When the building footprint is calculated as a standalone calculation with the public realm within the red line excluded then an Urban Greening Factor of 0.40 is achieved. Overall, officers consider that proposals for potential urban greening have been maximised and taking into consideration the characteristics of the site the application would accord with London Plan Policy G4.

- 11.69 Within the site there are two existing mature trees which are to be retained (Ash and Hornbeam). Both trees are located along Shinfield street and are Category A trees. The trees will be protected in accordance with BS 5837:2012 during the construction works. The remainder of the trees on the site of Plot A will however be lost as part of the proposals. The tree loss was however approved as part of the Masterplan and a mitigation strategy was approved through the provision of new landscaping across. The site wide Masterplan results in a substantial uplift in trees, with the entire central square dedicated to a soft landscape environment once the works are completed.
- 11.70 The new public realm incorporates recommendations to enhance the biodiversity value such as the inclusion of wildlife planting as part of the landscaping and a biodiverse roof. The final measures to be included will come forward as part of the landscaping details required by condition.
- 11.71 Subject to the inclusion of conditions officers consider that the proposed development accords with Policies G5, G6 and G7 of the London Plan and Policies OS1, OS4 and OS5 of the Local Plan in terms of ecological and urban greening.

Wind Microclimate

- 11.72 **London Plan Policy GG1** requires streets and public spaces to be planned for circulation by the comfort in comfort and safety, and to be welcoming. **London Plan Policy D8** addresses the environmental impact of tall buildings, requiring careful consideration of the wind conditions around tall buildings and their neighbourhoods so that they do not compromise the comfort and enjoyment of them.
- 11.73 **Policies D8 and D9 of the London Plan and Policy DC3 of the Local Plan** require consideration to be given to avoiding detrimental microclimatic impacts as part of tall building proposals. **Policy CC2** seeks to ensure that developments are comfortable and secure for users and avoid impacts from natural hazards.
- 11.74 Wind Microclimate Report dated October 2022 was submitted with the application. This report provides an assessment of the pedestrian-level wind environment around the proposed development against comfort and safety criteria. A detailed Computational Fluid Dynamics (CFD) study focuses on

pedestrian access routes, amenity spaces, outdoor seating areas, bus stops, drop-off points and building entrances. Additionally, an assessment of the roof terrace within the proposed development is included. The study combines numerically obtained pedestrian level wind speeds at key areas within and around the Site of the Proposed Development with long-term wind frequency statistics transposed from the weather station to determine the probability of local wind speeds exceeding comfort and safety thresholds for a range of common pedestrian activities.

11.75 All schemes that were identified as under construction at the time of this assessment have been considered to be completed and therefore, treated as existing context. The assessment comprises the following three scenarios:

- Baseline Scenario: The existing condition of the site within the existing surrounding context.
- Proposed Scenario: The proposed development on the site within the existing surrounding context; and
- Cumulative Scenario: The proposed development on the site within the existing surrounding context and consented schemes.

The 3D model constructed for the study includes the built area within a radius of approximately 500 meters from the site. The Lawson Criteria sets a threshold wind speed and a threshold frequency to the suitability of an activity. The results for the Baseline scenario indicate that the existing wind environment within the site and its surroundings is largely suitable for sitting and standing throughout the year with relatively calm wind conditions.

11.76 The results of the assessment indicated that the wind environment within the proposed development site and its immediate surroundings remains within the safety and comfort criteria for all pedestrians and therefore, no additional mitigation is required. The proposed development once completed is expected to experience wind conditions on the site and surrounding area suitable for the intended use. The winter results of assessment identified some localised windiness at around the proposed building entrance located on the south façade and at the roof terrace, which can be mitigated with suitable landscaping or implementing seating area on the terrace in the area identified as suitable for “sitting”.

11.77 Overall pedestrian comfort and safety is assessed to be suitable for walking, sitting, and standing within the site during both the winter and summer months. It is considered that the impacts outlined above at the south entrance and on the terrace on the 9th floor can be secured by appropriate conditions in terms of materials and landscaping. Officers consider that the proposed development accords with Policies GG1, D8 and D9 of the London Plan (2021) and Policies DC3 and CC2 of the Local Plan (2018).

12.0 SOCIO-ECONOMIC BENEFITS/SOCIAL VALUE

- 12.1 **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 including visitor accommodation and facilities.
- 12.2 The development would generate temporary construction jobs and there will be an opportunity during the construction phase for employment placements/apprenticeships for H&F residents.
- 12.3 Overall the proposals will help deliver further regeneration, increased employment opportunities and housing provision for people living/studying within the White City Opportunity area and within the Wider White City East as required by Local Plan Policies WCRA and WCRA1 and London Plan policies GG1 (Building strong and inclusive communities) SD1 (Opportunity Areas). The development would be expected to generate approximately 28 full time employment.
- 12.4 The applicant would be required to work with the borough and local training, employment, and education agencies to maximise local take up of positions during the construction phase of the development. The legal agreement will secure that 10% of the construction costs will be offered as local procurement contracts and are secured for the local economy together with delivering by way of a contribution secured by obligation to apprentices, and work placements.
- 12.5 The proposed development would deliver 216 student beds. The development would also contribute to the overall housing delivery targets for the borough providing the equivalent of 86 homes based on Paragraph 4.1.9 of the London Plan which states that student accommodation should count towards meeting housing targets on a 2.5:1 ratio, meaning 2.5 bedrooms are equivalent to a single home.
- 12.6 The NHS North West London have requested a capital payment towards the provision of healthcare facilities towards the provision of healthcare facilities which the NHS deem necessary for the proposed student accommodation scheme at White City Campus North. The basis for this contribution is the use of the HUDU Model which is advertised as a tool for assessing the health service requirements and costs impacts of new residential development. The validity of using a tool for residential development to calculate net increase in population and assigning it to student accommodation, which has an entirely different profile, has been questioned.
- 12.7 Since the request for a financial contribution was made prior to two recent High Court decisions which specifically address the questions as to whether it is lawful for section 106 contributions to be used to fund the provision of NHS services has been made. NHS England has the function of arranging for the provision of services for the health service in England and must exercise its functions in relation to “*clinical commissioning groups*” (CCG’s) so as to secure that services are provided in accordance with the National Health

Service Act. NHS England is obliged to determine and then pay the amount to be allotted in a financial year to each CCG towards meeting the expenditure of that group “*which is attributable to the performance by it of its functions in that year*”. Importantly, NHS England may make a new allotment increasing or decreasing an allotment previously made. The requested contribution is therefore not being targeted towards a public facility which has been directly harmed by the proposed development, but rather towards general funding replicated by the statutory duties of the NHS. It is therefore considered that the request by NHS North West London for a financial contribution has not been demonstrated to be necessary. Alternatively funding towards physical, social Infrastructure and initiatives, including schools and education has been sought.

- 12.8 In summary, the development will have an overall positive socio-economic impact through the provision of employment opportunities and through the provision of student accommodation including the provision of 35% affordable student housing.
- 12.9 Finally the completion of the North campus and the finalization of the new public realm and landscaping features associated with the consented masterplan will also serve the needs of proposed residents and the wider community; and make tangible improvements to connectivity to the wider regeneration area and biodiversity.

13.0 COMMUNITY INFRASTRUCTURE LEVY (CIL)

Mayoral / Borough CIL

- 13.1 Mayoral CIL (Community Infrastructure Levy) came into effect in April 2012 and is a material consideration to which regard must be had when determining this planning application. Under the London wide Mayoral CIL the development would be subject to a CIL payment. This would contribute towards the funding of Crossrail. The GLA expect the Council, as the Collecting Authority, to secure the levy in accordance with London Plan Policy 8.3.
- 13.2 The Council has also set a local CIL charge levied on the net increase in floorspace arising from developments to fund infrastructure that is needed to support development. The CIL Charging Schedule has formally taken effect since the 1 September 2015.

14.0 SECTION 106 HEADS OF TERMS

- 14.1 The NPPF 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’.

- 14.2 **London Plan Policy DF1** recognises the role of planning obligations in mitigating the effects of development and provides guidance of the priorities for obligations in the context of overall scheme viability.
- 14.3 **Local Plan Policy INFRA1** (Planning Contributions and Infrastructure Planning) advises that 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 (CIL) and Section 106 Agreements (s106).
- 14.4 The planning obligations set out in the heads of terms below are 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 proposal is in accordance with the statutory development plan and to secure the necessary infrastructure to mitigate the needs of the proposed development.
- 14.5 In view of the fact the Section 106 agreements 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 Chief Planning Officer 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.
- 14.6 To this end, and in compliance with the above policies, the following Heads of Terms have been agreed with the applicant to be included within a legal agreement:
- **Public Realm and Environmental Improvements Contribution** of £400,000.
 - **Physical and Social Infrastructure and Initiatives, including schools and education Contribution** of £406,208
 - **Carbon Offset Contribution** of £177,317. Final payment calculation subject to the outcome of the revised Energy Strategy secured by condition no. 22.
 - **Employment/Training /Local Procurement Contribution:** including:
 - An Employment & Skills financial contribution of £52,500 to carry out and provide procuring training and employment during the construction of the development.
 - 10% of the labour employed on the construction of the development to be H&F residents, including:
 - 5 apprenticeships created into which H&F residents are employed.
 - Submit a Jobs, Employment and Training (JETS) to the Council for approval.
 - 10% of the build cost to be spent on suppliers based in H&F

- Non-compliance with the agreed number of apprentices and placements attracting a contribution of £7,000 per apprentice/placement not created, and
 - Prepare a Local Procurement Strategy and / Local Procurement Supply Chain Financial Contribution of £6,375
- **Demolition and Construction Site Air Quality Dust Compliance Monitoring Contribution:**
 - £10,000 payable for the purposes of reviewing and monitoring the construction site AQDMP compliance plan during the construction phases of the development.
 - Contribution paid every 12 months from the anniversary of the Commencement of the Development until Practical Completion of the Development of the Development
- **Construction Logistics Plan Contribution:**
 - A monitoring fee of £3,000 given the likely cumulative impacts of development in the White City Regeneration Area.
- **Construction Workforce Travel Plan & Monitoring Contribution**
 - A monitoring fee of £5,000 per year of construction.
 - Contribution paid every 12 months from the anniversary of the Commencement of the Development until Practical Completion of the Development of the Development
- **Submission of Final Travel Plans and Monitoring Contribution:**
 - Travel Plans for each land use (student accommodation and ground floor commercial use). Each Travel Plan to be monitored at years 1, 3 and 5 with a monitoring fee of £5,000 per submission.
- **CPZ Review Contribution:**
 - **£5,000** in connection to the CPZ review of CPZ Zone 'NN'
- **Cycle and Pedestrian Improvements Contribution:**
 - £50,000 cycle and pedestrian improvements contribution.
- **Highways**
 - £30,000 towards highway works in the vicinity of the application site.
- **No business / student accommodation parking permits** other than a Blue Badge Holder) to apply for a Parking Permit for any controlled parking zone in the Borough.
- **Provision of two blue badge parking spaces** provided with active electric vehicle charging points (minimum 22 kW).
- **A site wide Cycle and Car Park Management Plan.**
- **A site wide Delivery and Servicing Plan.**

The DSP shall demonstrate that all servicing and deliveries shall take place from within the site. Details shall include:

- (a) Use of Zero Exhaust Emission Vehicles in accordance with the emissions hierarchy (1) Walking Freight Trolleys (2) Cargo bike (3) Electric Vehicle, (4) Alternative Fuel e.g., CNG, Hydrogen.
- (b) Facilities and measures that will minimise the impact of vehicle emissions from increasing personal deliveries e.g., carrier agnostic parcel locker, concierge, etc.
- (c) Reduction and consolidation of deliveries and collections e.g., Waste
- (d) Re-timing of deliveries and collections where possible outside of peak traffic time periods of 07:00-10:00 and 15:00-19:00 hrs.
- (e) Times, frequency and management of deliveries and collections including collection of waste and recyclables.
- (f) Operations of the loading bay (s) as identified on the approved plans.
- (g) Emergency access, and vehicle movement at the site entrance and throughout the development.
- (h) Quiet loading/unloading mitigation including silent reversing measures in accordance with Building Design Guidance for Quieter Deliveries, TFL, June 2018.

- **Student Accommodation**

- A maximum 216 student units to be provided within the development.
 - Student accommodation to be operated directly by Imperial College London GradPad.
 - 35% of the student studios to be provided as affordable student accommodation. Defined as a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55% of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living; or the annual rent cost for affordable purpose-built student accommodation that the Mayor of London sets out in the London Plan Annual Monitoring Report,
 - Framework Student Management Plan prior to first occupation of the student accommodation. The management plan shall include details for the arrangement for day-to-day management arrangements during the academic year; access and security; communal area management including use/management of the terrace area; accessibility management; maintenance; individual room management; tenancy agreements (including but not limited to tenant conduct); moving in and out procedure (including vehicular and pedestrian arrivals/departures); lighting and security; antisocial behaviour and fire and health and safety procedures and liaison. The development shall not be operated otherwise than in accordance with the Student Management Plan as approved.
 - A minimum 21 studios (10%) shall be designed and be capable of adaptation as Accessible Wheelchair Studios.
- **A Deed of Variation to the existing S106 Agreement in respect of Planning Permission ref: 2019/0124/FUL & 2018/01256/VAR dated 3 November 2020**, involving the omission of relevant clauses relating to Plot A and secure relevant clauses in respect to the site wide masterplan legal agreement.

- **Council's Legal Costs** - Payment of the Council's reasonable legal and other professional costs incurred in preparing the S106 agreements.

15.0 CONCLUSION

- 15.1 In considering planning applications, the Local Planning Authority needs to consider whether or not the proposed development accords with the development plan as a whole and any other material considerations. The NPPF explains that planning applications that accord with the development plan should be approved without delay.
- 15.2 In the assessment of the application regard has been given to the NPPF, London Plan, and Local Plan policies as well as guidance. It is considered that the proposal is acceptable in land use and design terms. The quantum of the proposed land uses, and the resulting nature of the site does not give rise to any unacceptable impacts and will amount to sustainable development in accordance with the National Planning Policy Framework.
- 15.3 The proposal would result in the redevelopment of a site providing 216 student rooms of which 35% would be affordable units which would meet the policy requirements of the London Plan.
- 15.4 The proposed development is considered to have an acceptable impact upon the amenities and living conditions within surrounding properties in respect of daylight, sunlight, overshadowing, overlooking/privacy, and noise impacts.
- 15.5 The redevelopment would also contribute beneficially to the local area and the borough by creating a high-quality built environment, delivering an excellent sustainability rating, and would see a car free development with policy compliant cycle spaces and adapting to climate change.
- 15.6 The height, scale and massing of the proposed built form is appropriate and provides a satisfactory design response to the site and surrounding townscape, delivering an appropriate level of density with regard to its location and the size of the site. The elevations have an architectural character which provide interest across the frontages and the relationship between the built form and public realm would assist in the creation of a sense of place.
- 15.7 The application site is located in the White City Regeneration Area, an area which is considered suitable for the development of tall buildings, following the approach of Local Plan (2018) Policy DC3. Following consideration of the framework of this policy, the proposal scheme is not considered to result in any disruptive or harmful impact upon the skyline and is also considered acceptable when assessed against the framework of London Plan (2021) Policy D9. As such, development of a tall building is considered to comply with the tall building policies.
- 15.8 No harm has been identified to the setting of adjacent heritage assets.

15.9 It is recommended that planning permission be granted for the proposed development, subject to no contrary direction from the Mayor of London, the completion of a satisfactory Legal Agreement based on the Heads of Terms outlined above and subject to the conditions listed at the beginning of this report.