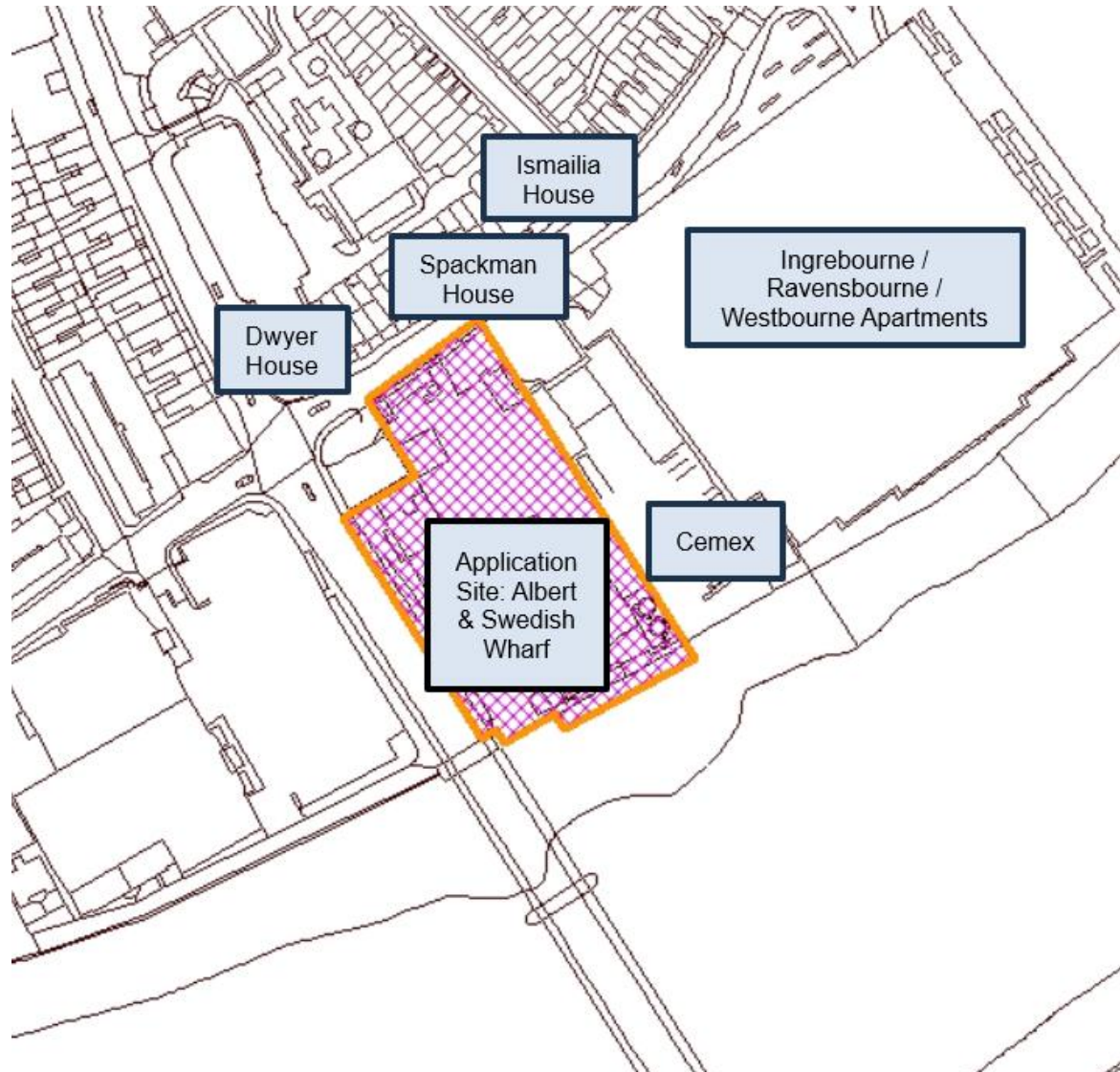


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**Ward:** Sands End

**Site Address:**

Land At Albert Wharf and Swedish Wharf, Wandsworth  
Bridge Road London SW6 2TY



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For identification purposes only - do not scale.

**Reg. No:**  
2021/03898/FUL

**Case Officer:**  
Roy Asagba-Power

**Date Valid:**  
06.12.2021

**Conservation Area:**  
Sands End Conservation Area - Number 41

**Committee Date:**  
13.02.2024

**Applicant:**

Henley Fusion Limited  
C/O Agent

**Description:**

Demolition of all existing buildings and structures; provision of new buildings ranging from 5 to 17 storeys in height comprising: safeguarded wharf for flexible general industrial / storage or distribution floorspace (use classes B2/B8/E(g)(iii)) for waterborne cargo handling including ancillary office accommodation at ground and mezzanine levels; with residential dwellings (use class C3) and ancillary communal floorspace above; a cafe/restaurant on the upper courtyard (use class E(b)); a new Thames Path with associated lift/stair access; a new jetty; communal and private amenity space and landscaping; vehicular access and servicing facilities; car and cycle parking; plant and all associated ancillary and enabling 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 of 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.

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#### **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 other than where those details are altered pursuant to the conditions of this planning permission:

### Site Plan

TP-0002 Proposed Site Plan 11163-EPR-00-00-DR-A-TP-0002 P3

### Proposed Plans

TP-2000 Basement Plan 11163-EPR-ZZ-B1-DR-A-TP-2000 P3  
TP-2100 Ground Floor Plan 11163-EPR-ZZ-00-DR-A-TP-2100 P4  
TP-2101 First Floor Plan 11163-EPR-ZZ-01-DR-A-TP- P4  
TP-2102 Second Floor Plan (Lower Courtyard) 11163-EPR-ZZ-02-DR-A-TP-2102 P4  
TP-2103 Third Floor Plan (Upper Courtyard) 11163-EPR-ZZ-03-DR-A-TP-2103 P4  
TP-2104 Fourth Floor Plan 11163-EPR-ZZ-04-DR-A-TP-2104 P4  
TP-2105 Fifth Floor Plan 11163-EPR-ZZ-05-DR-A-TP-2105 P4  
TP-2106 Sixth Floor Plan 11163-EPR-ZZ-06-DR-A-TP-2106 P4  
TP-2107 Seventh Floor Plan 11163-EPR-ZZ-07-DR-A-TP-2107 P4  
TP-2108 Eighth Floor Plan 11163-EPR-ZZ-08-DR-A-TP-2108 P3  
TP-2109 Ninth Floor Plan 11163-EPR-ZZ-09-DR-A-TP-2109 P3  
TP-2110 Tenth Floor Plan 11163-EPR-ZZ-10-DR-A-TP-2110 P3  
TP-2111 Eleventh Floor Plan 11163-EPR-ZZ-11-DR-A-TP-2111 P3  
TP-2112 Twelfth Floor Plan 11163-EPR-ZZ-12-DR-A-TP-2112 P3  
TP-2113 Thirteenth to Fourteenth Floor Plan 11163-EPR-ZZ-13-DR-A-TP-2113 P3  
TP-2115 Fifteenth Floor Plan 11163-EPR-ZZ-15-DR-A-TP-2115 P3  
TP-2116 Sixteenth Floor Plan \*from P2 11163-EPR-ZZ-16-DR-A-TP-2116 P3  
TP-2117 Roof Plant (A1) Floor Plan 11163-EPR-ZZ-16-DR-A-TP-2117 P1  
TP-2121 Roof Plan 11163-EPR-ZZ-RF-DR-A-TP-2121 P3

### River Wall

WSP-ST-SK-FN-002

### Proposed Elevations

TP-4101 South Elevation 11163-EPR-ZZ-XX-DR-A-TP-4101 P3  
TP-4102 North Elevation 11163-EPR-ZZ-XX-DR-A-TP-4102 1:200 P4  
TP-4103 East Elevation 11163-EPR-ZZ-XX-DR-A-TP-4103 P4  
TP-4104 West Elevation 11163-EPR-ZZ-XX-DR-A-TP-4104 P4  
TP-4105 Courtyard - South Elevation 11163-EPR-ZZ-XX-DR-A-TP-4105 P4  
TP-4106 Courtyard - North Elevation 11163-EPR-ZZ-XX-DR-A-TP-4106 P3  
TP-4107 Courtyard - East Elevation 11163-EPR-ZZ-XX-DR-A-TP-4107 P4  
TP-4108 Courtyard - West Elevation 11163-EPR-ZZ-XX-DR-A-TP-4108 P4

### Proposed Sections

TP-5101 Section AA 11163-EPR-ZA-XX-DR-A-TP-5101 P4  
TP-5102 Section BB 11163-EPR-ZB-XX-DR-A-TP-5102 P4  
TP-5103 Section CC 11163-EPR-ZZ-XX-DR-A-TP-5103 P3  
TP-5104 Section DD 11163-EPR-ZZ-XX-DR-A-TP-5104 P3

### Proposed Bay Details

TP-5501 Bay 01 Towers Side Elevation 11163-EPR-ZZ-XX-DR-A-TP-5501 P3  
TP-5502 Bay 02 Towers South Elevation 11163-EPR-ZZ-XX-DR-A-TP-5502 P3

TP-5503 Bay 03 Typical Mansion Block 11163-EPR-ZZ-XX-DR-A-TP-5503 P3  
TP-5504 Bay 04 Block C Typical Elevation 11163-EPR-ZC-XX-DR-A-TP-5504 P4  
TP-5505 Bay 05 Block C North Elevation 11163-EPR-ZC-XX-DR-A-TP-5505 1:50 P4  
TP-5506 Bay 06 Block B East Elevation 11163-EPR-ZZ-XX-DR-A-TP-5506 P3

### Schedules

Schedule of Accommodation 11163-EPR-ZZ-XX-SH-A-00-0002 P1

Schedule of Accommodation Residential 11163-EPR-ZZ-XX-SH-A-00-0003 P1

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, D6, D7, D8, D9, D11, D12, D13, D14, HC1, HC3, HC4, 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. These details shall include the proposed sequencing/phasing of the development. The temporary fencing and/or enclosure shall be retained for the duration of the enabling, demolition and building works 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) Demolition Management Plan**

Prior to the commencement of the demolition phase of the development, a Demolition Management Plan (DMP) shall be submitted to and approved in writing, by the Local Planning Authority. The DMP shall include:

- a) Details of location of site offices, ancillary buildings, plant, wheel-washing facilities, stacking bays and car parking.
- b) Storage of any skips.
- c) Oil and chemical storage.
- d) Membership of the Considerate Contractors Scheme.
- e) 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 0800-1300 hrs on Saturdays and not on Sundays or Bank Holidays.
- f) 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.
- g) Details shall also include the use of on road Ultra Low Emission Zone compliant Vehicles e.g. Euro 6 and Euro VI.
- h) Provisions within the site to ensure that all vehicles associated with the demolition works are properly washed and cleaned to prevent the passage of mud and dirt onto the highway.

i) Details of the use of River Thames, to reduce demolition vehicle movements on the surrounding 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 Policy D14 of the London Plan (2021), Policies DC1, DC12, CC6, CC7, CC10, CC11 and CC12 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

### **5) Demolition Logistics Plan**

Prior to the commencement of the demolition phase of the development, a Demolition Logistics Plan (DLP) in accordance with the Transport for London Guidance shall be submitted to and approved in writing by the Local Planning Authority. The works shall cover the following minimum requirements:

- a) Site logistics and operations.
- b) Demolition vehicle routing.
- c) Details of the estimated number, size and routes of demolition vehicles per day/week.
- d) Details of the use of Ultra Low Emission Zone (ULEZ) compliant Vehicles e.g. Euro 6 and Euro VI.
- e) Details of the access arrangements and delivery locations on the site.
- f) Details of any vehicle holding areas; and other matters relating to traffic management to be agreed as required.
- g) Efficiency and sustainability measures to be undertaken for the works; and Membership of the Considerate Contractors Scheme.
- h) Details of the use of River Thames, to reduce demolition vehicle movements on the surrounding 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 Policy T7 of the London Plan (2021) and T1, T6 and T7 of the Local Plan (2018).

### **6) Construction Management Plan**

Prior to the commencement of the construction phase 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) A detailed plan showing phasing relevant foundations, basement, and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), contractors' method statements.
- b) Waste classification and disposal procedures and locations.
- c) Location of site offices, ancillary buildings, plant, wheel-washing facilities, tacking bays and car parking.
- d) Details of storage and any skips, oil and chemical storage.
- e) Membership of the Considerate Contractors Scheme and contractors accredited to FORS silver.

- f) 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, and not on Sundays or Bank Holidays.
- g) 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.
- h) Details of the use of on-road Ultra Low Emission Zone compliant Vehicles e.g. Euro 6 and Euro VI
- i) 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.
- j) Details of the use of the River Thames, to reduce construction vehicle movements on the surrounding 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).

## **7) Construction Logistics Plan**

Prior to the commencement of the construction phase 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) Detailed plan showing phasing.
- e) Location of site offices, ancillary buildings, plant, wheel-washing facilities, stacking bays and car parking.
- f) Storage of any skips, oil, and chemical storage etc.
- g) Access and egress points, with times of vehicle access restrictions to be set out at peak times.
- h) Details of the access arrangements and delivery locations on the site.
- i) Details of any vehicle holding areas, and restriction of vehicle numbers to no more than 6 vehicles maximum in any one hour; and other matters relating to traffic management to be agreed as required.
- j) Efficiency and sustainability measures to be undertaken for the works; and
- k) Membership of the Considerate Contractors Scheme and appoint contractors who are accredited to FORS Silver or above.
- l) Details of the use of the River Thames, to reduce construction vehicle movements on the surrounding highway.

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 (2021) and T1, T6 and T7 of the Local Plan (2018).

### **8) 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).

### **9) 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).

### **10) 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).

### **11) 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).

### **12) 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 work 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).

### **13) 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).

### **14) Piling Method Statement**

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. 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.

### **15) Archaeology**

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

- B. Where appropriate, details of a programme for delivering related positive public benefits.
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.

This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and is in accordance with Policy HC1 of the London Plan and Policy DC8 of the Local Plan (2018).

### **16) Air Quality Dust Management Plan (Demolition phase)**

Prior to the commencement of the demolition phase of the development hereby permitted, an Air Quality Dust Management Plan (AQDMP) to mitigate air pollution 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 'A' 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 Demolition 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 NOx Emission mitigation and control measures including for on-road and off-road construction traffic as required by the overall Medium/High 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/m<sup>3</sup>, 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](mailto:constructionairqualitymonitoring@lbhf.gov.uk)
- g) The data from the on-site Particulate (PM10) monitors shall also be made available on the council's construction site air quality monitoring register <https://www.envimo.uk> website.
- h) 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 IV NO<sub>x</sub> and PM<sub>10</sub> 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 NO<sub>x</sub> and PM. An inventory of all NRMM for the first phase of demolition shall be registered on the London City Hall NRMM register GLA-NRMM-Register prior to commencement of demolition works and thereafter retained and maintained until occupation of the development.

i) Details of the use of on-road Ultra Low Emission Zone (ULEZ) compliant vehicles e.g., minimum Petrol/Diesel Euro 6 (AIR Index <https://airindex.com/> Urban NO<sub>x</sub> rating A) and Euro VI.

Developers must ensure that on-site contractors follow best practicable means to minimise dust, particulates (PM<sub>10</sub>, PM<sub>2.5</sub>) and NO<sub>x</sub> emissions at all times. Approved details shall be fully implemented and permanently retained and maintained during the demolition phases of the development.

To comply with the requirements of Policy SI1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

### **17) Air Quality Dust Management Plan (Construction phase)**

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 PM<sub>10</sub> (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<sub>x</sub> 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 (PM<sub>10</sub>) and Dust Monitoring Procedures and Protocols including locations of a minimum of 2 x MCERTS compliant Particulate (PM<sub>10</sub>) monitors on the site boundaries used to prevent levels exceeding predetermined PM<sub>10</sub> Site Action Level (SAL) of 190 µg/m<sup>3</sup>, measured as a 1-hour mean. Prior to installation of the PM<sub>10</sub> monitors on site the calibration certificates of MCERTS compliant PM<sub>10</sub> monitors and the internet-based log-in details to enable access to the real-time PM<sub>10</sub> monitoring data from the PM<sub>10</sub> monitors shall be issued to Hammersmith & Fulham Council by e-mail to

constructionairqualitymonitoring@lbhf.gov.uk. The data from the on-site Particulate (PM<sub>10</sub>) 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 IV NO<sub>x</sub> and PM<sub>10</sub> 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 NO<sub>x</sub> and PM. An inventory of all NRMM for the first phase of construction shall be registered on the London City Hall NRMM register GLA-NRMM-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 (PM<sub>10</sub>, PM<sub>2.5</sub>) and NO<sub>x</sub> 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 (2021) and Policy CC10 of the Local Plan (2018).

### **18) Ventilation Strategy**

Prior to commencement of above ground works of the residential building in the development hereby permitted, a Ventilation Strategy Report to mitigate the impact of existing poor air quality for the residential units 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 (NO<sub>2</sub>), and Particulate (PM<sub>10</sub>, PM<sub>2.5</sub>) concentrations are equal to 20ug/m<sup>3</sup>, 20ug/m<sup>3</sup> and 10 ug/m<sup>3</sup> 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 residential floors.

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

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<sub>x</sub>) and Particulate Matter (PM<sub>2.5</sub>, PM<sub>10</sub>) 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<sub>2.5</sub>, PM<sub>10</sub>) in accordance with BS EN ISO 10121-1:2014 and BS EN ISO 16890:2016.

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 SI 1 of the London Plan (2021) and Policy

CC10 of the Local Plan (2018).

### **19) 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 19 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 Surveyor (MRICS). 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 SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

### **20) Zero Emission Heating compliance**

Prior to occupation of the development, 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 residential units and non-residential uses 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 SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

### **21) Deliveries and Collections**

At the development hereby permitted no deliveries nor collections/ loading nor unloading shall occur other than between the hours of 10:00 to 16:00 and 19:00 to 21:00 hrs on Monday to Friday and 10:00 to 18:00 on Saturdays and at no time on Sundays and Public/Bank Holidays.

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 Development Management Local Plan (2018).

### **22) 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 (2021) and Policy CC10 of the Local Plan (2018).

### **23) Aerobic Food Digester (AFD)**

Prior to occupation of the development hereby permitted, details of the installation/commissioning of Aerobic Food Digesters (AFD) for the Commercial Use (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 SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

### **24) Flood Risk Assessment (FRA)**

The development hereby permitted shall be carried out in accordance with the measures contained within the approved Flood Risk Assessment (Prepared by WSP January 2023). No part of the development shall be used or occupied until all flood prevention and mitigation measures have been installed in accordance with the submitted details and the development shall be permanently retained in this form and maintained as necessary thereafter.

To reduce the impact of flooding to the development and future occupants, in accordance with Policies SI 5 and SI 13 of the London Plan (2021) and Policy CC3 of the Local Plan (2018).

### **25) Surface Drainage Strategy/SuDS**

Prior to commencement of the development (excluding Enabling and Demolition Works) hereby permitted, full details of the Surface Water Drainage Strategy and Design shall be submitted to the Local Planning Authority for approval which shall include the Sustainable Drainage Systems (SuDS) to be used to manage surface water discharge from the site, within each part of development as appropriate. SuDS Measures shall include but not be limited to rainwater harvesting for collection and re-use of surface water, soft landscaping including living roofs, permeable hard surfaces and attenuation storage and controlled release of stormwater. Confirmation of discharge connections and rates shall be provided along with maintenance information for each SuDS measure. Detailed Plans shall be provided to show all SuDS measures and how they connect to the wider drainage network. The detailed SuDS scheme must demonstrate that it has been developed in accordance with the overarching principles set out in the Flood Risk Assessment (January 2023), in compliance with the London Plan Drainage Hierarchy to minimise any required discharge of surface water to the sewer network. The Detailed Strategy and Designs

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 Policy SI 13 of the London Plan (2021) and policies CC1, CC2, CC4, CC5, OS1, OS4 and OS5 of the Local Plan (2018).

## **26) Green and Brown Roofs**

Prior to commencement of relevant works to the buildings, final details of all green and/or brown roofs within the development; including the identification of further opportunities for these roofs, 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 blue and 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).

## **27) Updated Energy Strategy**

Prior to commencement of the development hereby permitted (excluding enabling and demolition works), an updated Energy Strategy for the development shall be submitted to and approved in writing by the Local Planning Authority. The 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 S I2, S I3 and S I4 of the London Plan (2021) and Policies CC1, CC2 and CC7 of the Local Plan (2018).

## **28) Wastewater 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 has 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.

To ensure sufficient capacity is provided to accommodate additional flows from the new development in accordance with as recommended by Thames Water and in accordance with Policy CC4 of the Local Plan (2018).

## **29) 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.

To ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development as recommended by Thames Water and in accordance with Policy CC4 of the Local Plan (2018).

### **30) Transport and/or industrial noise sources**

Prior to commencement of above ground works noise assessment shall be submitted to the Local Planning Authority for approval of external noise levels incl. reflected and re-radiated noise and details of the sound insulation of the building envelope, orientation of habitable rooms away from major noise sources 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 and surrounding premises is not adversely affected by vibration, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

### **31) Separation of noise sensitive rooms in neighbouring flats**

Prior to commencement of the residential buildings in the development, 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 adjoining dwellings. 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 noise in accordance with Policies CC11 and CC13 of the Local Plan (2018).

### **32) Separation of communal facilities/plant etc. noise from noise sensitive premises**

Prior to commencement of above ground works, 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 ground floor plant room from the residential units. Details shall demonstrate that the sound insulation value  $D_{nT,w}$  is sufficiently enhanced above the Building Regulations value and, where necessary, additional mitigation measures implemented to contain commercial noise within the commercial premises and to achieve the criteria  $L_{Amax,F}$  of BS8233:2014 within the dwellings/ noise sensitive premises. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

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).

### **33) Sound Insulation of commercial building envelope e.g. Wharf Warehouse**

Prior to commencement of the construction phase of the commercial building of the development, details shall be submitted to and approved in writing by the Local Planning Authority, of sound insulation of the building envelope and other mitigation measures, as appropriate. Details shall demonstrate that noise from uses and activities are contained within the building/ development site and shall not exceed the criteria of BS8233:2014 at neighbouring noise sensitive/ habitable rooms. 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 noise in accordance with Policies CC11 and CC13 of the Local Plan (2018).

### **34) External noise from machinery, extract/ ventilation ducting, plant, mechanical gates, etc.**

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

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

### **35) Emergency Generators**

Prior to first operational use of each building, details shall be submitted to and approved in writing by the Local Planning Authority to confirm that sound emitted by standby or emergency generators, during power outages or testing does not exceed the lowest daytime ambient noise level LAeq (15min) as measured or calculated according to BS4142:2014.

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

### **36) Anti- vibration mounts and silencing of machinery etc.**

Prior to commencement of the relevant part of the development, 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).

### **37) Vibration levels**

Prior to commencement of above ground works, details shall be submitted to and approved in writing by the Council, of building vibration levels and, together with appropriate mitigation measures where necessary. Details shall demonstrate that vibration will meet a level that has low probability of adverse comment, and the assessment method shall be as specified in BS 6472:2008. No part of the development shall be occupied until the approved details have been implemented. Approved details shall 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).

### **38) Extraction and Odour Control system for non-domestic kitchens**

Prior to the installation of extract and odour systems to the commercial building, details shall be submitted to and approved in writing by the Council, of the installation, operation, and maintenance of the odour abatement equipment and extract system, including the height of the extract duct and vertical discharge outlet, in accordance with Appendix 4G of the LBHF Planning Guidance Supplementary Planning Document - February 2018. Approved details shall be implemented prior to the commencement of the use and thereafter be permanently retained.

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

### **39) Floodlights, security lights and decorative external 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 amenity of occupiers of surrounding premises is not adversely affected by lighting, in accordance with Policies CC12 and CC13 of the Local Plan (2018).

### **40) Noise from Use and Activities**

Noise from uses and activities within the new residential and commercial buildings 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).

#### **41) Mechanical Gates: Location/ Installation/ Separation**

No part of the gates or their supports shall be in direct contact with the external walls or other external parts of adjacent buildings while open or closed.

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

#### **42) Mechanical Gates: Anti- vibration mounts and silencing**

Prior to use, gate posts shall be installed with proprietary anti-vibration isolators to prevent structural or airborne vibration noise being transmitted and the closing mechanism shall be buffered to adequately silence the operation of the gates.

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

#### **43) Extraction and Odour Control system for non-domestic kitchens**

Prior to commencement of use of the non-residential part of the development, details shall be submitted to and approved in writing by the Council, of the installation, operation, and maintenance of the odour abatement equipment and extract system, including the height of the extract duct and vertical discharge outlet, in accordance with Appendix 4G of the LBHF Planning Guidance Supplementary Planning Document - February 2018. Approved details shall be implemented prior to the commencement of the use and thereafter be permanently retained.

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

#### **44) Balconies/Terraces**

Other than the areas explicitly identified on the approved drawings as a balcony or roof terrace, no other part of any roof of the new buildings shall be used as a roof terrace or other form of open amenity space. No alterations shall be carried out; nor planters or other chattels placed on the roofs. No railings or other means of enclosure shall be erected on the roofs, and no alterations shall be carried out to any elevation of the application properties to form access onto the roofs.

The use of the roofs as a terrace 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).

#### **45) Hours of Use of Terraces – café restaurant**

Any outdoor use of the terrace areas hereby approved to the café/restaurant shall only be used between 08.00 hours and 20:00 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, in accordance with policy CC11 and CC13 of the Local Plan (2018) and guidance within the Planning Guidance Supplementary Planning Document (2018).

#### **46) Materials**

Prior to the commencement of the relevant part of the development (excluding demolition works), details of particulars and samples (where appropriate) of all the materials to be used in all external faces of the buildings; including details of the colour, composition and texture of the brick, concrete and metal work; 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 or screening to balconies and roof terraces; roof top plant and general plant screening; entrances and ground floor glazing, including shopfronts, canopy 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 preserve the character and appearance of the surrounding conservation areas and other heritage assets; and to protect the amenities of neighbouring occupiers in terms of overlooking and privacy, in accordance with Policies D3, D4, D8, D9 and HC1 of the London Plan (2021), and Policies DC1, DC2, DC3, DC8 and HO11 of the Local Plan (2018) and guidance contained within the Planning Guidance Supplementary Planning Document (2018).

#### **47) Sample Panels**

Prior to the installation of the facade installations of the relevant part of the development, sample panels detailing brick colour, bond, pointing style, mortar colour, and curtain walling 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 (2021), Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018), and guidance contained within the Planning Guidance Supplementary Planning Document (2018).

#### **48) 1:20 Details – Typical Bays**

Prior to the commencement of the relevant part of the development (excluding demolition), detailed drawings at a scale not less than 1:20 (in plan, section, and elevation) of typical sections/bays of the approved commercial and residential 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 (2021), Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018), and guidance contained within the Planning Guidance Supplementary Planning Document (2018).

#### **49) 1:20 Details - Boundaries**

Prior to the commencement of the public realm surface works, detailed drawings at a scale not less than 1:20 (in plan, section, and elevation) of boundary walls, fences, railings, and gates shall be submitted and approved in writing by the Local Planning Authority and no part of the development shall be used or occupied prior to the completion of the relevant works in accordance with the approved details.

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 (2021) and Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018).

#### **50) 1:20 Roof Top Plant Enclosures**

Prior to the relevant part of the development, detailed drawings at a scale not less than 1:20 (in plan, section, and elevation) of the rooftop plant enclosures for each building shall be submitted to and approved in writing by the Local Planning Authority. No part of the relevant 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 (2021) and Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018).

#### **51) Roller Shutters**

Prior to the relevant part of the development detailed drawings at a scale not less than 1:20 (in plan, section, and elevation) of the wharf elevation including walls, roller shutters/ gates shall be submitted and approved in writing by the Local Planning Authority and no part of the development shall be used or occupied prior to the completion of the relevant works in accordance with the approved details.

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 (2021) and Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018).

#### **52) Window Glass**

The window glass of any ground floor non-residential use hereby approved shall be clear and shall not be mirrored, 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 LBHF Local Plan (2018).

### **53) Advertisements**

No advertisements shall be displayed on the development hereby approved without details of the advertisements having first been submitted to and approved in writing by the Local Planning Authority.

To ensure a satisfactory external appearance and to preserve the integrity of the design of the development, and to ensure that the amenity of occupiers of surrounding premises is not adversely affected by artificial lighting, in accordance with Policies DC1, DC2, DC8, DC9 and CC12 of the Local Plan (2018).

### **54) Entrance Doors & Thresholds**

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

To ensure the development provides ease of access for all users, in accordance with Policy D5 of the London Plan (2021), and the LBHF SPD (2018).

### **55) 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).

### **56) Refuse**

No removal of refuse to external areas shall be carried out other than between the hours of 10:00 to 16:00 and 19:00-21:00 on Monday to Friday and 10:00 to 18:00 on Saturdays; and at no time on Sundays and Public/Bank Holidays.

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).

### **57) Secure by Design**

The development of the commercial and residential building (save demolition and site clearance) shall not commence until a statement of how 'Secured by Design' requirements in relation to the new residential and commercial buildings are to be adequately achieved has been submitted to and approved in writing by the Local Planning Authority. The approved details shall be carried out prior to use of the development hereby approved and permanently maintained thereafter.

To ensure a safe and secure environment for users of the development, in accordance with Policy DC2 of the Local Plan (2018).

### **58) Secure by Design (post completion)**

Within 3 months prior to occupation of the residential and commercial building, a

statement of how 'Secure by Design' requirements have been 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 and a feasibility study relating to linking CCTV with the Council's borough wide CCTV system, access controls, security measures throughout the site and means to secure the site throughout construction works in accordance with BS8300:2009. The security measures shall be implemented in accordance with the approved details and 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, DC2 and DC8 of the Local Plan (2018).

### **59) Landscaping & Public Realm**

Prior to commencement of the landscape/public realm works hereby permitted, final details of the proposed soft and hard landscaping works to all areas of the development and external to the buildings shall be submitted to and approved in writing by the Local Planning Authority having regard to the 'Using Green Infrastructure to Protect People from Air Pollution', Mayor of London, GLA, April 2019 guidance.

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, all paving and external hard surfaces, boundary walls, railings, gates, fences, and other means of enclosure.

Any plants which die, are removed, become seriously damaged and diseased within a period of five years from completion of the development shall be replaced in the next planting season with others of similar size and species. The landscaping and public realm 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 Policies D3, D4, D8, D9 and HC1 of the London Plan (2021), and Policies DC1, DC2, DC3, DC8, OS2 and OS5 of the Local Plan (2018).

### **60) Landscape and Ecological Management Plan**

Prior to the commencement of the public realm works within the development hereby permitted, a Landscape and Ecological Management Plan shall be submitted to and approved in writing by the Local Planning Authority for all the landscaped areas in the development. This shall include details of management responsibilities and maintenance schedules for all landscape areas, as well as a habitat management plan and monitoring report which shall set out objectives and prescriptions for the management of new areas of vegetation and public open spaces within the development, for a minimum period of 5 years from the date of occupation of that



phase.

The landscape and ecological management plan shall be implemented in accordance with the approved details and shall thereafter be permanently retained in this form.

To ensure that the development provides an attractive natural and visual environment, and that the biodiversity of the site is protected and enhanced where possible in accordance with Policies CC2, DC1, DC8, OS2, OS4, and OS5 of the Local Plan (2018).

#### **61) Play space**

Prior to first occupation of the residential buildings hereby permitted, the details of outdoor play space, including play equipment, boundary treatments and ground surface treatment of the outdoor play spaces shall be submitted to the Local Planning Authority for approval. Any play equipment shall be designed to be fully inclusive to ensure the play areas are accessible to all and shall be implemented in accordance with the approved plans, to be permanently retained thereafter.

To ensure equal life chances for all, and to prevent groups such as blind people and disabled children being excluded from use of public realm and other amenities by designs failing in detail to take specific needs into account, in accordance with Policy S4 of the London Plan (2021) and Policy OS3 of the Local Plan (2018).

#### **62) Artificial Nesting Opportunities**

Prior to occupation of the residential and commercial buildings, details of 'artificial nesting opportunities' including bird and bat boxes within the development shall be submitted to the Local Planning Authority for approval. The 'artificial nesting opportunities' shall be installed in accordance with the approved details prior to the first occupation of the development and shall be permanently maintained thereafter.

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 G6 of the London Plan (2021), Policy OS4 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

#### **63) Television Interference**

Prior to the commencement of the development hereby permitted (and excluding site clearance and demolition work) 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. 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).

#### **64) Airwaves Interference Study**

Prior to commencement of the development hereby permitted (and excluding site clearance and demolition work) the following details shall be submitted to and

approved in writing by the Local Planning Authority:

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  
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).

#### **65) 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).

#### **66) Window Cleaning Equipment**

Prior to the occupation of the buildings hereby approved, details of the proposed window cleaning equipment for each relevant building 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. Each 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 (2021) and Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018).

#### **67) Car Parking**

No part of the of the residential and commercial buildings hereby approved shall be occupied until the 9 designated blue badge parking spaces have been provided in accordance with approved drawings. These accessible parking spaces shall be permanently retained for the life of the development for use by holders of a valid blue badge.

To ensure the provision and retention of disabled car parking facilities, in accordance with Policies D5, T6, T6.1, T6.4 and Policy T6.5 of the London Plan (2021) and Policies E3, HO6, T1 and T5 of the Local Plan (2018).

#### **68) Cycle Parking**

a) Prior to occupation of the residential and/or commercial building hereby approved

the provision of cycle parking spaces including full details of the provision for both cargo cycles and e-cycles spaces made available to residents, visitors and staff shall be submitted to and approved in writing by the Local Planning Authority. The cycle storage/parking facilities shall be permanently retained thereafter in accordance with the approved details.

b) Prior to occupation of the Wharf use hereby approved the provision of cycle parking spaces including full details of the provision for both cargo cycles and e-cycles spaces made available for visitors and staff shall be submitted to and approved in writing by the Local Planning Authority. The 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 (2021) and Policy T3 of the Local Plan (2018).

### **69) Electric Vehicle Charging Points**

Prior to occupation of the buildings hereby approved, details of the installation and commissioning reports of the active electric vehicle charging points (minimum 22 kW) for all of the 9 on-site disabled car parking spaces and a minimum of one of the 3 servicing bays, are submitted to and approved in writing by the Local Planning Authority. The approved electric vehicle charging points shall be installed and retained in working order for the lifetime of the development.

To encourage the use of electric vehicles and to mitigate against poor air quality in accordance with Policy SI 1 and T6 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

### **70) Zero Emission Delivery Hub**

Prior to occupation of the development hereby permitted, details of the installation of a minimum of five cargo bike parking spaces with cargo bike stands must 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 encourage the use of zero emission vehicles and to mitigate against poor air quality in accordance with Policy SI 1, and T6 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

### **71) Refuse**

No part of the development hereby approved shall be occupied until the approved refuse storage enclosures for each relevant part of the site, as indicated on the approved drawings, have been provided for the storage of refuse and recyclable materials. All the refuse/recycling facilities shall be retained thereafter in accordance with the approved details.

To ensure the satisfactory provision of refuse storage and recycling and to prevent harm to the street scene arising from the appearance of accumulated rubbish, in accordance with Policies DC2, CC6 and CC7 of the Local Plan (2018) and SPD Key Principle WM1 (2018).

### **72) Waste Management Strategy**

The development hereby permitted shall be undertaken in full accordance with the

approved Waste Management Strategy and shall be 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 Policy T7 of the London Plan (2021) and Policies CC6 and CC7 of the Local Plan (2018) and SPD Key Principle WM1 (2018).

### **73) Basement Waterproofing**

Prior to commencement of the development (excluding Enabling and Demolition Works) hereby permitted, details of the structural water-proofing measures proposed for the basement, including any detailed plans and specifications, shall be submitted for approval by the council to demonstrate that there will be no increase in flood risks from groundwater on or off site as a result of the development.

To prevent any increase in flooding within the basement as a result of internal sewer flooding in accordance with Policy CC3 of the Local Plan (2018).

### **74) Lifts**

Prior to first occupation of the commercial and residential buildings, 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).

### **75) Fire Strategy**

The development shall be carried out and completed in accordance with the submitted Fire Statement prepared by Hilson Moran. 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).

### **76) Signage Strategy – Thames Path**

Prior to six months of the completion of the development, a signage strategy including the access to the Thames Path shall be submitted to and approved in writing by the Local Planning Authority. Approved details shall be fully implemented prior to the completion of the development and thereafter permanently retained and maintained.

To ensure a satisfactory external appearance of the development and relationship with its surroundings, in accordance with Policies DC1, DC2 and DC9 of the Local Plan (2018).

### **77) Number of Residential Units**

The total number of residential units (Class C3) hereby approved shall not exceed 276 residential units, unless details have been submitted to and approved in writing by the Local Planning Authority.

To ensure the development carried out does not exceed the cumulative maximum approved and to ensure the quantum of floor space keeps within the parameters assessed in relation to the development in accordance with the National Planning Policy Framework, Policies D4, D5, D6, D7, D8, D9, HC1, SI 1 and G5 of the London Plan (2021) and Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018).

### **78) Commercial Building – café/ restaurant**

The commercial part of the development hereby permitted shall only be used as flexible general industrial / storage or distribution with ancillary office accommodation (Classes B2/ B8/ E(g)) and a café/ restaurant (Class E(b)) and for no other purpose (including any other separate purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987, as amended, (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 special circumstances of the case. Certain other uses within the same use class may be unacceptable due to effect on residential amenity or traffic generation, in accordance with Policies DC1, DC4, HO11, CC11, CC13 and T1 of the Local Plan (2018)

### **79) Whole Life-Cycle Carbon Assessment - Post-Construction**

Within 6 months of occupation or use of the development, a post-construction monitoring report setting out how the development has met with the requirements of the approved Whole Life-Cycle Carbon Assessment 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 SI2 (2021).

### **80) Circular Economy Assessment Post-Construction Report**

Within 6 months of occupation or 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 SI 7 (2021).

### **81) Photovoltaic (PV's) system**

No part of commercial and residential buildings hereby approved shall be occupied until full details of the proposed photovoltaic (PV's) system on the roofs of building are submitted to and approved in writing by the Local Planning Authority at a scale no less than 1:20 in plan, section and elevation. Such details shall be implemented prior to occupation or use of the building and shall be retained thereafter.

To ensure that the development is consistent with the Mayor's sustainable design objectives, to ensure a satisfactory external appearance and to prevent harm to the

street scene and public realm, in accordance with Policies SI 2, SI 3, D1, D4 of the London Plan (2021), Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

### **82) London Heliport - Cranes and aviation lighting**

The 17-storey building should be fitted with aviation lighting which includes one on each corner of the Thames side elevation at the highest point of the building .

To give visual guidance to pilots to ensure that the development does not interfere with the navigation of aviation in accordance with Policy D9 of the London Plan.

### **83) Thames Navigation**

Prior to any occupation of the wharf a Full Navigational Risk Assessment, including a detailed passage plan and operational plan shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Port of London Authority. The proposed development shall only proceed in accordance with the approved details.

In order to ensure the acceptable position of the marine structures, and impact on freight operators and the River Thames in accordance with Policies SI15 and SI16 of the London Plan and OS4, RTC3 and RTC4 of the Local Pan (2018).

### **84) Thames Flood Defences**

A detailed scheme to replace the river wall/ flood defence shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Environment Agency prior to the construction phase of the development. This scheme shall be in line with approved drawing *WSP-ST-SK-FN-002*, which provides a minimum setback for subterranean elements of 7450mm (with a 300mm tolerance zone) and a crest level of 6.35m AOD.

The scheme shall be supported by structural and stability calculations to achieve a life expectancy of the river wall of no less than 100 years without needing a major intervention.

The detailed design will also investigate and, where feasible, implement, ecological enhancement measures into the river wall. Potential measures shall include Tiber fenders between MHWN and MHWS and Vertipools. Further consideration shall be given into the potential to incorporate new floating reedbed habitats (subject to navigational requirements); increased mud flat habitat and/or additional planters. The development shall then only proceed in accordance with the approved scheme and shall be maintained as such thereafter.

Further information is required to clarify the following:

- Whether the applicant will replace the soil adjacent to the flood defence with fill between the existing and proposed flood defences.
- That the proposed flood defence is sufficiently robust considering further site investigations.
- Whether an intertidal terrace is feasible and appropriate.
- Details on how the proposed jetty will tie into the flood defence.

To ensure the flood defence structure is consummate with the lifetime of the development (the applicant has committed to replacing the existing river wall) and will secure ecological enhancements along the wall and proposed jetty in line with the

Environment Act 2021, the NPPF, Policies SI13 of the London Plan and RTC1, RTC2, RTC3, RTC4 and CC3 of the Local Plan (2018).

**85) Agent of Change Principle - Operational Management Plan**

Prior to the first occupation of the development hereby permitted an Operational Management Plan to address potential noise nuisance or noise environmental health impacts shall be submitted to and approved in writing by the Local Planning Authority setting out the following:

- a) A commitment from the owner of the development to ensure that the approved mitigation set out in the Agent of Change Assessment Nov 2021 and Agent of Change Addendum Jan 2023 are installed properly, is maintained in perpetuity and is correctly repaired in the event of failure, paying reference to any relevant British Standards adopted at the date of this planning permission.
- b) A commitment to provide an information pack to all residents of the development which shall include an explanation of:
  - i. The mitigation provided and how it works.
  - ii. The maintenance responsibilities in respect of the mitigation provided
  - iii. Confirmation that the filtration system for the Mechanical Ventilation and Heat Recovery system will be maintained as part of the servicing responsibilities of the site owner for all units.
  - iv. The procedures to follow in the event the Mechanical Ventilation Heat Recovery system fails.
  - v. Residents' responsibilities to make use of the mitigation provided to protect themselves from exposure to potential noise nuisance or noise environmental health impacts arising from neighbouring uses.
  - vi. The Complaints Procedure, being the procedure residents should follow if there are any complaints about any noise nuisances or noise environmental health impacts alleged to arise from neighbouring uses. In the first instance, it is expected that the owner of the development/management company will be contacted via a clearly identified liaison officer.
  - vii. The support to be given with any specific equality needs (e.g. ill health, disabilities, language barriers etc).

Thereafter the Operational Management Plan shall be implemented and retained as approved for the lifetime of the development.

To ensure the implementation of satisfactory mitigation measures in relation to the operation of the site for the proposed occupiers of the development and existing surrounding occupiers relating to air, noise, vibration and lighting pollution as recommended by Thames Water and in accordance with London Plan Policies SI 1 and SI15 and Policies CC10, CC11, CC12 and CC13 of the Local Plan (2018).

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**JUSTIFICATION FOR APPROVING**  
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**(1) Land Uses:**

The proposed land uses are supported by adopted policies relating to the South Fulham Riverside Regeneration Area (SFRRA), Thames Policy Area and Safeguarded Wharf including those which are specified in the Council's Strategic Policy SFRRA. Officers consider that the proposed reinstatement of the wharf with ancillary offices, residential uses, an extension to the riverwalk and a café/ restaurant adjacent to the riverwalk are appropriate in this location. The proposed development would retain and improve the vitality of the protected wharf together with a new jetty to re-establish the transport of cargo by river rather than road. The proposals are consistent with the allocated land uses within the SFRRA. The proposal has adopted a design-led approach to optimise the capacity of a site in keeping with its surroundings within an emerging high-density area. The supporting information, including the Environmental Statement demonstrate that the development provides a good range of services and amenities for the occupiers of the site. The proposed uses are therefore supported in land use terms subject to the satisfaction of other development plan policies and would be in accordance with the NPPF; Policies GG1, GG2, SD1, E2 and H1 of the London Plan (2021); and Policies SFRRA, RTC1, RTC2, RTC3, RTC4, HO1, HO3 and HO4 of the Local Plan (2018).

## **(2) Housing:**

The proposal would contribute to the overall housing delivery targets for the borough and the regeneration area. The provision of 276 new homes (including 35% affordable) is acceptable. The proposed housing mix and tenure mix are also considered to be acceptable, as is the standard of accommodation provided for prospective occupiers. The proposal is considered to be in accordance with the NPPF; Policies GG4, H1, H4, H6 and H10 of the London Plan (2021); and Policies HO1, HO2 (b), HO3, HO4, HO5, HO6 and HO11 of the Local Plan (2018).

## **(3) Design and Heritage:**

It is considered that the proposals would deliver good quality architecture which regenerates part of the South Fulham Riverside Regeneration Area and optimises the capacity of the site with good quality office, commercial and residential accommodation within a high-quality public realm. The proposed development includes tall buildings 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, notably the Sands End conservation area, 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, DC8 and DC9 of the Local Plan (2018).

## **(4) Impact on Neighbouring Properties and Agent of Change Principle:**

The impact of the proposed development upon adjoining occupiers and future occupiers is considered on balance to be acceptable. It is acknowledged that the proposal results in some instances whereby losses of sunlight or daylight are recorded within adjacent developments and existing residential receptors. The resulting retained sunlight and daylight conditions within the most affected properties are considered to be typical of high-density, urban high-rise developments. Consideration has also been given to issues relating to noise/disturbance and outlook/overlooking/loss of privacy and in the



round not considered impacts would be such as to warrant refusing planning permission, considering the wider benefits of the scheme. The design of the development acknowledges the siting and proximity of adjoining sensitive receptors has been designed in a manner to reduce the impacts where possible. In this regard, the development would respect the principles of good neighbourliness. The proposed development, on balance, broadly accords with Policies SI15, D3, D6, D8, T4, D4, D11, D13 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:**

Subject to appropriate enabling and mitigations works, it is considered that the scheme would not have an unacceptable impact on the highway network or local parking conditions. Provision would be made for blue badge car parking, cycle parking (including cargo and E bikes). External impacts of the development would be controlled by conditions and section 106 provisions, and a Section 278 will be necessary in respect of various enabling and mitigation works on the public highway, including works on the site frontage, the creation of a new vehicle crossover/access on Townmead Road, improvements to the existing pedestrian and cycling environment surrounding the immediate vicinity of the Site, and implementation of a scheme to improve crossing facilities at the junction of Wandsworth Bridge Road, Carnwath Road and Townmead Road. Appropriate conditions and clauses in the proposed s106 agreement will also be required relating to a range of matters; these will include, but not be limited to, securing satisfactory provision for the storage/collection of refuse and recyclables, the provision of blue badge parking, cycle and refuse storage, construction logistics plan, travel plans, a service and delivery plan and related monitoring. The site is well served by public transport and consequently benefits from a good accessibility level. In addition, servicing and road safety and travel planning initiatives would be implemented in and around the site to mitigate against potential issues. Subject to appropriate mitigation measures the proposed development is therefore on balance considered to be acceptable assessed against development plan Policies T1, T2, T3, T4, T5, T6.2, T6.3, T6.5 and T7 (London Plan 2021) and Policies RTC4, T1, T2, T3, T4, T5, T7 and CC7 (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 incorporate a mixture of green and brown 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 SI 2, SI 3 and SI 4 of the London Plan (2021) and Policies CC1, CC2 and CC7 of the Local Plan (2018).

#### **(7) Flood Risk and drainage:**

The majority of the site is in Flood Zone 3 which indicates a high risk to flooding from the River Thames. However, the site is well defended from this form of flood risk by the Thames Barrier and also the local river wall defences. 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 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. 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. Conditions are secured to provide additional mitigation measures through the materials and landscaping. Subject to the inclusion of conditions the proposed development accords with Policies D8, D9, G5 and G7 of the London Plan 2021 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, Policy D11 of the London Plan 2021 and Policy DC1 of the Local Plan 2018.

**(13) Archaeology:**

The site is within an area of archaeological interest. In line with, the Greater London Archaeological Advisory Service (GLAAS) a condition has been attached to secure further archaeological investigation. 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 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 Policies E2 and E3 and Local Plan Policies E1 and E4.

**(15) Accessibility and Safety:**

10% of the residential units would be wheelchair accessible and one blue badge car parking space and cycle storage spaces for adapted/larger cycles would be 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, D7 and D11 of the London Plan 2021; and Policy H06 of the Local Plan 2018.

**(16) Fire Strategy:**

A Fire Strategy has been provided to include response to recent requirements of a second staircase and evacuation lifts. The HSE have considered the proposals and raise no objections to the latest amended proposals. The proposal will provide a high-quality environment for disabled and impaired members of the community and the commitments within the Accessibility 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) Environmental Impact Assessment:**

The Environmental Statement, and the various technical assessments together with the consultation responses received from statutory consultees and other stakeholders and parties, enable the Council to determine this application with knowledge of the likely significant environmental impacts of the proposed development.

**(18) 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.

**(19) 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.

**(20) 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 affordable housing, economic development initiatives, including local training, employment opportunities and procurement, towards public realm, and environmental improvements, social, physical, economic, and transport infrastructure, monitoring 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.

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

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

Application form received: 3rd December 2021  
Drawing Nos: see above

**Policy documents:** National Planning Policy Framework (NPPF) 2023  
The London Plan 2021  
LBHF - Local Plan 2018  
LBHF – Planning Guidance Supplementary Planning Document  
2018

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**LIST OF CONSULTATION & NEIGHBOUR COMMENTS (ADDRESSES).**

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**Consultation Comments:**

**Date**

**Comments from:**

**GLA**

Port Of London Authority

XXXXXX

20.12.21

Port Of London Authority	27.01.22
Port Of London Authority	15.02.22
Port Of London Authority	29.07.22
Port Of London Authority	17.01.24
Transport For London - Land Use Planning Team	07.03.23
Transport For London - Land Use Planning Team	09.01.24
London Fire and Emergency Planning Authority Fulham Station	14.02.22
Health And Safety Executive Fire Safety	08.03.23
Thames Water - Development Control	10.01.22
Thames Water - Development Control	01.03.23
Thames Water (Thames Tunnel Team)	04.01.22
Thames Water (Thames Tunnel Team)	01.03.23
Environment Agency - Planning Liaison	28.01.22
Environment Agency - Planning Liaison	02.01.24
Environment Agency - Planning Liaison	02.01.24
Historic England London Region	23.12.21
Historic England London Region	16.02.23
London Borough Of Wandsworth	22.04.22
Crime Prevention Design Advisor - Hammersmith	06.01.22
Crime Prevention Design Advisor - Hammersmith	03.03.23
British Airports Authority Plc	21.12.21
London Heliport	08.03.23
Civil Aviation Authority - Directorate of Airspace Policy	21.02.23
MP Chelsea & Fulham, Minister for Energy, Clean Growth & Climate Change, House of Commons London SW1A 0AA	09.08.22

### **Neighbour Representations**

### **Date**

Fulham Society 1 Rosaville Road SW6	05.03.23
7 Alderville Road SW6	07.01.22
18 Alderville Road SW6	18.01.22
18 Alderville Road SW6	07.01.22
18 Alderville Road SW6	22.02.23
18 Alderville Road SW6	18.01.24
2 Althea Street SW6	10.08.22
26 Althea Street SW6	17.01.22
27 Althea Street SW6	25.01.22
7 Ashcombe Street SW6	09.01.22
7 Ashcombe Street SW6	01.03.23
7 Ashcombe Street SW6	17.01.24
7 Ashcombe Street SW6	18.01.24
11 Ashcombe Street SW6	17.01.24
39 Ashcombe Street SW6	07.01.22
50 Barclay Road SW6	10.01.22
24 Bradbourne Street SW6	13.03.23
37 Breer Street SW6	20.02.23
49 Breer Street SW6	04.01.22
21 Broomhouse Road SW6	25.01.22
12A Broughton Road SW6	13.03.23

49 Burnfoot Avenue SW6	11.03.23
Concierge Office Fulham Riverside 5 Central Avenue, SW6	17.01.24
3 Ingrebourne Apartments SW6	22.12.21
3 Ingrebourne Apartments SW6	17.01.24
4 Ingrebourne Apartments 5 Central Avenue SW6	21.01.22
7 Ingrebourne Apartments SW6	20.01.22
9 Ingrebourne Apartments 5 Central Avenue SW6	12.01.22
9 Ingrebourne Apartments 5 Central Avenue SW6	17.01.24
13 Ingrebourne Apartments 5 Central Avenue SW6	24.12.21
13 Ingrebourne Apartments SW6	30.07.22
20 Ingrebourne Apartments 5 Central Avenue SW6	20.01.22
22 Ingrebourne Apartments 5 Central Avenue SW6	08.01.22
22 Ingrebourne Apartments 5 Central Avenue SW6	24.07.22
22 Ingrebourne Apartments 5 Central Avenue SW6	05.01.22
25 Ingrebourne Apartments 5 Central Avenue SW6	19.01.24
26 Ingrebourne Apartment Townmead Road SW6	21.01.22
55 Ingrebourne Apartments, 5 Central Avenue SW6	31.12.21
55 Ingrebourne Apartments 5 Central Avenue SW6	09.08.22
14 Ravensbourne Apartments 5 Central Avenue SW6	31.01.22
36 Ravensbourne Apartments 5 Central Avenue SW6	18.01.22
45 Ravensbourne Apartments 5 Central Avenue SW6	09.06.22
45 Ravensbourne Apartments 5 Central Avenue SW6	10.08.22
45 Ravensbourne Apartments 5 Central Avenue SW6	18.01.24
90 Westbourne Apartments 5 Central Avenue SW6	19.01.22
13 Westbourne Apartments 5 Central Avenue SW6	18.01.22
Carnwath Road SW6	23.03.23
33 Chiddingstone Street SW6	11.03.23
33 Chiddingstone Street SW6	08.01.24
Flat Ground Floor 57 Chiddingstone Street SW6	11.03.23
51 Chipstead Street SW6	21.01.22
51 Chipstead Street SW6	11.03.23
Clancarty Road SW6	20.12.21
6 Dolby Road SW6	08.01.22
24 Dymock Street SW6	14.01.22
27 Dymock Street SW6	21.01.22
12 Edenhurst Avenue Harwood Road SW6	13.03.23
16 Elswick Street SW6	14.03.23
16 Elswick Street London SW6	14.01.22
Studio K, Chelsea Studios, 414-416 Fulham Road SW6	18.01.24
26 Gowan Avenue SW6	21.01.22
30 Hamble Street SW6	08.08.22
15a Hugon Road SW6	07.01.22
15a Hugon Road SW6	30.07.22
15a Hugon Road SW6	15.03.23
43 Hugon Road SW6	07.01.22
40 Hurlingham Square SW6	09.01.22
106 Hurlingham Road SW6	17.01.24
46 Langthorne Street SW6	07.01.22
46 Langthorne Street SW6	27.07.22
58 Langthorne Street SW6	14.03.23
52a Niton Street SW6	21.01.22
13 Oakley Street SW3	22.01.22

68 Orbain Road SW6	13.03.23
22 Philpot Square SW6	17.01.22
22 Philpot Square Peterborough Road SW6	22.02.23
36 Philpot Square Peterborough Road SW6	22.02.23
25 The Piper Building Peterborough Road SW6	17.01.24
Flat 66, The Piper Building Peterborough Road SW6	11.03.23
46 Hurlingham Square Peterborough Road SW6	12.03.23
46 Hurlingham Square SW6	12.03.23
Flat 70, Sullivan Court Peterborough Road SW6	13.03.23
11 Rivermead Court Ranelagh Gardens SW6	14.03.23
76 St Dionis Road SW6	17.01.24
76 St Dionis Road SW6	17.01.24
10 Willow Lodge 71 Stevenage Road SW6	22.01.22
5 Stokenchurch Street SW6	07.03.23
1 Sunlight Mews SW6	12.03.23
1 Sunlight Mews SW6	12.03.23
1 Sunlight Mews SW6	18.01.24
1 Sunlight Mews SW6	18.01.24
Flat 4, Cyprus House 183 Townmead Road SW6	19.01.22
Flat 4, 183 Cyprus House Townmead Road SW6	20.06.22
Flat 4, 183 Cyprus House Townmead Road SW6	20.06.22
Flat 4 Cyprus House 183 Townmead Road SW6	20.06.22
4 Cyprus House 183 Townmead Road SW6	31.01.24
Flat 12 Dwyer House 2 Townmead Road SW6	12.01.22
Flat 20 Dwyer House 2 Townmead Road SW6	11.01.22
Flat 20 Dwyer House 2 Townmead Road SW6	11.01.22
20 Dwyer House 2 Townmead Road SW6	22.02.22
Flat 20 Dwyer House 2 Townmead Road SW6	13.03.23
Flat 20 Dwyer House 2 Townmead Road SW6	18.01.24
Flat 23 Dwyer House 2 Townmead Road SW6	30.03.23
Stanier House, Townmead Road SW6	27.01.22
10 Spackman House 12 Townmead Road SW6	08.01.22
58b Townmead Road SW6	09.01.22
Ground Floor Flat 40 Wandsworth Bridge Road, SW6	25.02.23
54 Wandsworth Bridge Road SW6	21.01.22
79 Wandsworth Bridge Road SW6	18.01.24
88 Wandsworth Bridge Road London SW6	22.01.22
123-125 Wandsworth Bridge Road SW6	18.01.24
239 Wandsworth Bridge Road SW6	08.01.22
263 Wandsworth Bridge Road SW6	18.01.24
266 Wandsworth Bridge Road SW6	21.01.22
284 Wandsworth Bridge Road SW6	11.03.23
284 Wandsworth Bridge Road SW6	17.01.24
4 Carrins House 291 Wandsworth Bridge SW6	15.03.23
304 Wandsworth Bridge Road SW6	12.03.23
304 Wandsworth Bridge Road SW6	17.01.24
312 Wandsworth Bridge Road SW6	21.01.22
312 Wandsworth Bridge Road SW6	14.03.23
3 Wandon Road SW6	21.01.22
5 Hobury Street Chelsea, SW10	20.01.22
Apartment 4.3 Hardwick House Waterfront Drive SW10	14.01.22
66 Lincoln's Inn Fields WC2A	10.01.24

Stantec Ltd the Stills 1st Floor, 80 Turnmill Street	EC1M 5QU	25.03.22
5 Endeavour Square	Stratford, London E20 1JN	07.03.23
County Hall	Oxford City OX1 1NE	22.02.22
3 Pittodrie Street	Aberdeen AB24 5AD	14.03.23
No Address Given		18.01.22
No Address Given		20.01.22
No Address Given	C/O Agent	21.01.22
No Address Given		24.01.22
No Address Given		09.08.22
No Address Given		19.01.24
No Address Given		23.01.24

## 1.0 SITE DESCRIPTION, SURROUNDINGS

### Site

- 1.1 The site (approximately 0.85 ha) is located on the north bank of the river Thames and includes two separate wharves; Albert Wharf and Swedish Wharf. The site is occupied by industrial machinery, shed-like buildings and open hard surface areas used for parking and loading, visible from the frontage to Townmead Road.



**Image 1: Site and Surroundings**

- 1.2 The lawful use of Albert Wharf is as a car auction business. Most of the area is made up of hardstanding which was used for the parking of vehicles prior to one of the twice-weekly auctions. There are railings separating the site from the river. The main building is near to Townmead Road (and so furthest from the Thames) as are smaller associated buildings. More recently, along its western boundary the site has been in use as a temporary bar use.
- 1.3 Swedish Wharf is also predominantly open and used for the storage and transfer of fuel. There are a number of storage tanks (including some underground) and associated infrastructure.

### Surrounding Area



- 1.4 To the west, the site is bound by Wandsworth Bridge. Beyond this is on the other side of the bridge is the former Hurlingham Retail Park. Permission granted for a residential-led, mixed use scheme, comprising 269 residential dwellings (ref 2018/02354/VAR) which is under construction with heights ranging from 5, 7, 8, 10 and 12- storeys.
- 1.5 To the east, is Comley's Wharf (a safeguarded wharf), a concrete batching plant operated by CEMEX which includes car parking area; a single and six storey building together with various structures and equipment associated with concrete batching plant. Further to the east, is the Fulham Riverside mixed use residential development (three to fifteen storeys) which includes Sainsbury's along the Townmead Road frontage.
- 1.6 Immediately to the north, is the Porcelanosa retail showroom (at the junction of Wandsworth Bridge Road). Further to the north, on the opposite side of Townmead Road are the flatted residential developments including Dwyer House and Spackman House which range between two and seven storeys.



**Image 2: Surrounding Riverside Context**

### **Policy Designations**

- 1.7 Swedish Wharf is a designated safeguarded Wharf to ensure they are protected for river cargo handling uses; Albert Wharf is not safeguarded. The site is located within the South Fulham Regeneration Area as defined in the Local Plan.
- 1.8 The site is located within the Sands End Conservation Area. The Studdridge Street Conservation Area is situated to the north. Old York Road Conservation Area is in Wandsworth. There are no listed buildings on the site, although to the north-west (outside the site), The Hurlingham Pub at 360 Wandsworth Bridge Road is a locally listed building.

- 1.9 The site is situated in Flood Risk Zones 3 and is subject to the Thames Policy Area designation. The Thames River is a Nature Conservation Area. A proposed Thames Path route is identified along the river frontage in the Local Plan proposals map, which seeks to link in with the existing Thames Path to the east and west.
- 1.10 The application site is not located in a town centre or key local centre and is not located in a neighbourhood or satellite parade.
- 1.11 The site is also subject to Health and Safety Executive (HSE) notification regulations associated with the fuel storage depot on Swedish Wharf. This triggers consultation with the HSE on the application.

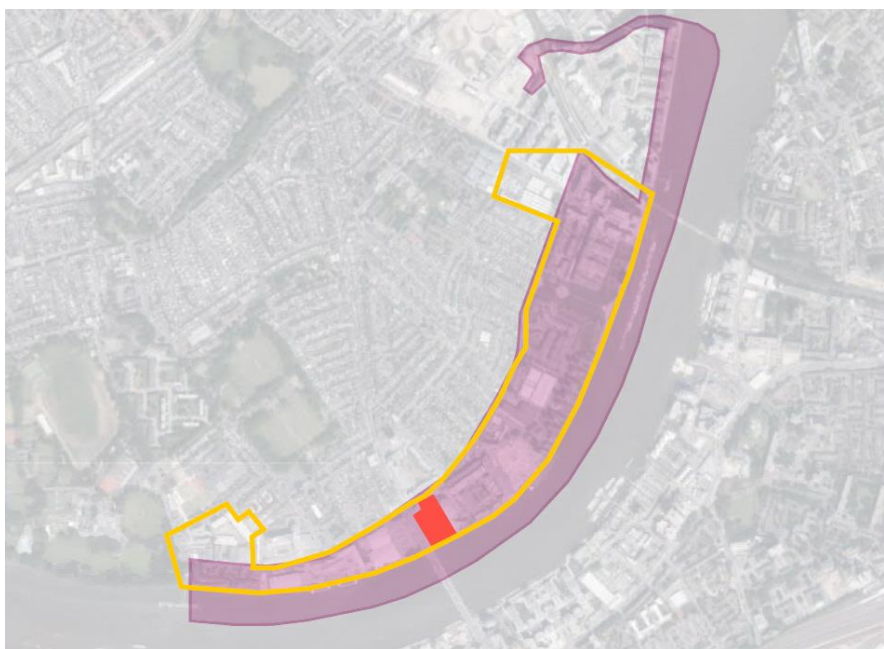


Image 3: SFRA (Yellow) and Sands End Conservation Area (Pink)

## Transport

- 1.12 The site has a public transport accessibility level (PTAL) of 4 to the west of the site and 3 to the east (on a scale of 1 to 6 where 1 is lowest and 6 is highest). The closest station to the site is Wandsworth Town Rail Station which is approximately 800 metres to the south on the other side of the River Thames via Wandsworth Bridge. Parson's Green London Underground Station (District Line) is 1.2 kilometres to the north. Imperial Wharf Overground Station (West London Line) is approximately 1 kilometre to the east. Fulham Broadway Underground Station (District Line) is over 1.5 kilometres to the north. The nearest bus stops to the site are located on Townmead (Routes 434, C3) and Wandsworth Bridge Road (Routes 28, 295, N28).
- 1.13 A cycleway is located along Wandsworth Bridge Road. The closest cycle hire docking station to the site is at the corner of Wandsworth Bridge Road and Stephendale Road approximately 170 metres to the north of the site. Wandsworth Bridge Road forms part of the Strategic Road Network. The closest section of the Transport for London Road Network (TLRN) is the A3/ A3205 to the south across the river at Wandsworth Bridge Roundabout.

## **2.0 RELEVANT PLANNING HISTORY**

### **2.1 Albert and Swedish (and Comley's Wharf)**

In 2015, planning permission (ref 2014/03250/FUL) was granted for the redevelopment of site together with the adjacent Comleys Wharf to provide a mixed use residential-led scheme for the erection of a five-storey building (facing Townmead Road), a part-five/part-six storey building (facing Wandsworth Bridge Road), a part-eight/part-nine storey building around a raised podium and a thirteen-storey building to provide: 237 dwellings (Class C3) and ancillary gymnasium; site wide energy centre; 9,875 sq./m Safeguarded Wharf including 8,069 sqm (GIA) of concrete batching plant with ancillary offices (use class B2); 579 sq./m (GIA) of retail/cafe/restaurant/bar floorspace (use classes A1/A2/A3/A4); new Thames Path with associated lift/stair access (to both east and west of the Site); new jetty within the River Thames to serve the wharf; associated hard and soft landscaping; private open space; vehicular access and servicing facilities; car parking and cycle parking; and other works incidental to the proposals. The s106 legal agreement included a financial contribution of £12.3m towards off-site affordable housing. This permission is no longer extant.

### **2.2 Albert Wharf (Fulham / Thameside Motor Auctions)**

The site was originally used for the balling of paper (1954) and gained planning permission for a motor auction site in 1976. Since this time a number of applications relating to advertisements along Wandsworth Bridge have been granted.

In 2017 and 2019 three temporary planning permissions (ref 2017/00498/FUL, 2017/02292/FUL and 2019/01745/FUL) have been granted for the installation of a covered seating area, bar area with associated pergola, beach huts, waste and refuse storage.

### **2.3 Swedish Wharf (Oil storage site)**

The Swedish Wharf site has been in use as a petrol and oil storage and distribution depot since at least 1954. Since this time a number of planning applications relating to outbuildings (garages and sheds) and storage tanks have been granted. Some planning applications relating to advertisement consent within the site have also been granted.

### **2.4 Comley's Wharf (adjacent to the east)**

In 2012, planning permission (ref 2010/01792/FUL) was granted for the redevelopment of site to provide a replacement concrete plant, aggregate storage facility, transfer building and conveyors and siting of batch cabin and office portacabin with associated cycle storage area. Subsequently amended in 2014 by a non-material variation (ref 2013/04999/NMAT) which approved amendments to the wording of conditions 3, 4, 7, 9, 10, 14 and 18, and the addition of conditions 20, 21, 22, 23 and 24.

In 2014, a certificate of lawfulness (ref 2014/05472/CLE) was granted to confirm that the Implementation of the 2012 planning permission 2010/01792/FUL (as subsequently amended by ref. 2013/04999/NMAT) had commenced due.

In 2021, a planning application was submitted for the erection of a new aggregate storage facility to replace existing, including internal storage bins and enclosed staircase (on western façade), with installation of new transfer conveyors and a new above ground hopper, receiving barge delivered aggregates directly. This application (ref: 2021/04047/FUL) is still under consideration.

## **2.5 Porcelonosa Showroom (adjacent to the north)**

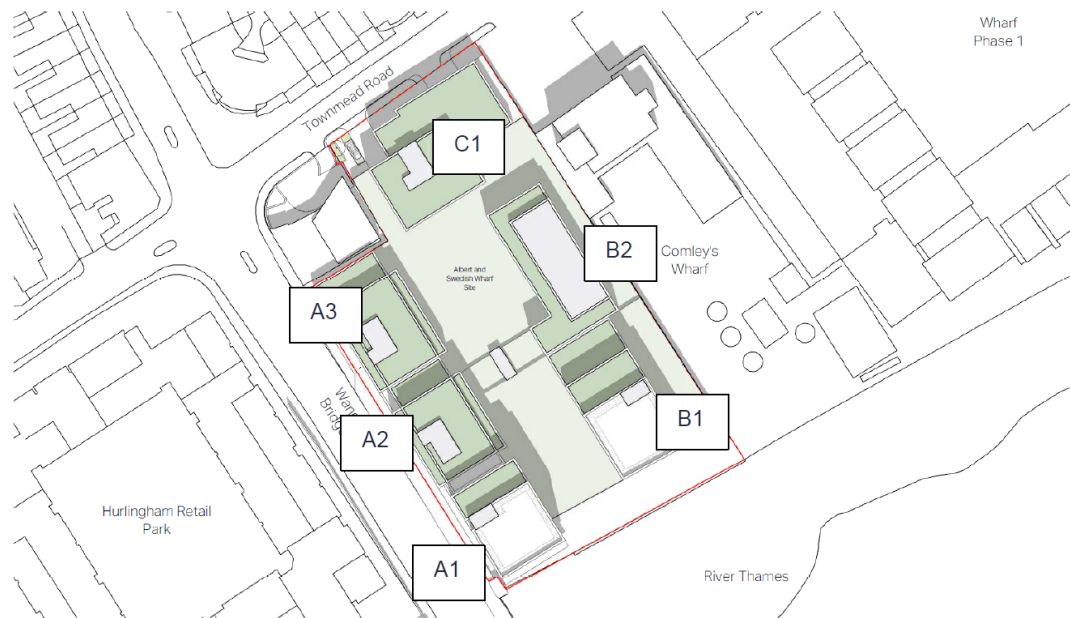
The Porcelonosa site does not form part of the application site but is located adjacent to the site on its eastern and southern boundary. The site was originally a petrol service station (1950) but gained planning permission in 2002 for a three storey (plus basement) building for use as showroom together with related office accommodation, a design studio and store (ref: 2001/02040/OUT) which has been constructed.

## **2.6 Hurlingham Retail Park (opposing corner to the west)**

This does not form part of the application site but lies to west on beyond Wandsworth Bridge. In 2014, planning permission was granted for a mix use redevelopment consisting of the erection of buildings ranging between 3 and 12 storeys (plus basement); providing 239 dwellings (Class C3); 3,045 sqm (GIA) of flexible retail / restaurant / public house / wine bar floorspace (use classes A1, A2, A3, A4); upgraded Thames Path; works of repair and alterations to the river wall; associated hard and soft landscaping, public and private open space, new public realm, pedestrian and cycle routes, vehicular access and servicing facilities, car parking (213 spaces) and cycle parking (556 spaces). This site is under construction.

## **3.0 DESCRIPTION OF DEVELOPMENT**

- 3.1 The application seeks full planning permission for the demolition of all existing buildings and structures and the erection of a mixed residential and commercial development. The proposed development involves the provision of 6 new buildings (A1, B1, A2, B2, A3 and C1) ranging from 5 to 17-storeys in height.



**Image 4: SFRRRA (Yellow) and Sands End Conservation Area (Pink)**

**Blocks A1 and B1** - the two riverside blocks are the tallest elements at 17 and 13 storeys respectively. Would be clad in metal and glass to create an industrial riverside aesthetic.

**Blocks A2, B2 and B3** - the three middle 'mansion' blocks are stepped down in height. Blocks A2 and A3 which face Wandsworth Bridge Road rise to 9 and 11 storeys high and Block B2 would be 9/10 storeys. These middle 'mansion' blocks would include light coloured brick materials to contrast with the black brick used to between these buildings and recessed metal clad forms at roof level.

**Block C** – has a reduced height of 5 storeys along Townmead Road which rises to 8 storeys towards the middle of the site. Along Townmead Road, this Block would have a 'warehouse' appearance that includes a simple grid of punched window openings with a darker brick tone.

- 3.2 The proposed uses would include the re-introduction of a safeguarded wharf for flexible general industrial / storage or distribution floorspace (use classes B2/B8/E(g)(iii)) for waterborne cargo handling including ancillary office accommodation at ground and mezzanine levels; with residential dwellings (use class C3) and ancillary communal floorspace above; a cafe/restaurant on the upper courtyard (use class E(b)); a new Thames Path with associated lift/stair access; a new jetty; communal and private amenity space and landscaping; vehicular access and servicing facilities; car and cycle parking; plant and all associated ancillary and enabling works.

Use	Proposed GIA	Proposed GEA
Industrial/wharf	4,699	4,860
Residential	26,588	29,442
Ancillary Residential (communal space including bikes, bins, residential entrances)	4,036	4,408
Residential amenity (internal shared amenity space for residents)	250	260
Café/Restaurant	71	76
<b>Total</b>	<b>35,644</b>	<b>39,046</b>

**Table 1: Proposed Floor Areas**

### **The Wharf/ Industrial Use**

- 3.3 The development will provide a 4,860 sqm GEA safeguarded wharf in the form of flexible general industrial / storage or distribution floorspace (use classes B2/B8/E(g)(iii)) including ancillary office accommodation.
- 3.4 The wharf would comprise a 'box' at the base of the buildings facing the river and would be accessed from a dedicated entrance on Townmead Road. The wharf has been designed in consultation with the Port of London Authority (PLA); will have a 7m and 10m clear height beneath the lower and upper courtyard areas respectively, as required by the PLA and will extend externally up to the river's edge (circa 10m open yard). A new jetty for waterborne cargo handling use is proposed in connection with a flexible industrial space to ensure the long-term use of the wharf.

### **Residential Use**

- 3.5 The development would provide 276 new residential units on the upper floors; 35% (based on floorspace) would be affordable housing.
- 3.6 The residential element will have access to both Townmead Road and Wandsworth Bridge Road from 4 separate cores at street level; one on Townmead Road and three on Wandsworth Bridge Road. Access to the Blocks (B1 and B2) on the eastern part of the site will be from the podium courtyard; access to this courtyard can be taken from any of the 4 residential entrance cores to street level, as well as through the Thames Path.
- 3.7 All residents will have access to shared internal residential amenity space located around the lower courtyard on the second floor in Block A3 as well as the 'linking' area between blocks A with B2. These amenity spaces are accessed either through the main/largest entrance (Block A3) or off the lower courtyard. The enclosed spaces in the link area could accommodate a range of ancillary uses, including communal work/ lounge or gym spaces.

### **Café/ Restaurant Use**

- 3.8 A café/restaurant (use class E(b)) of 76 sqm GEA will be provided at upper courtyard level. A new extension to the Thames Path is proposed and access to the new Path will be provided by lift/stairs from Wandsworth Bridge Road. The path will extend along the river up to the eastern Site boundary. It has been



designed to enable continuation along Comley's Wharf should that be redeveloped in the future.

### **Public Realm including Extension to Thames Riverside Walk**

- 3.9 The proposals involve the inclusion of a Thames riverside walk over the operational, safeguarded wharf 'box' below which includes the potential to connect the Thames Path and Wandsworth Bridge Road in the future.

### **Access Arrangements: vehicular, cycling and pedestrians.**

- 3.10 Vehicular access and servicing facilities for the residents would be provided from Townmead Road on Site. There is no general parking other than 9 disabled car parking spaces (with electric charging facilities) and 3 servicing bays are proposed. The industrial wharf would have separate vehicular and pedestrian access along Townmead Road.
- 3.11 In total, 509 long-stay cycle parking spaces and 16 short-stay spaces are proposed for the residential and café/restaurant uses are proposed. The additional required cycle spaces for the 'wharf' use will be secured by conditions but is yet to be determined due to the flexible uses proposed.

### **Inclusive Access**

- 3.12 The building will provide an inclusive environment throughout (including in the landscaped areas), maximising access for all. All entrances provide level access into the building and internal spaces are designed to be suitable for use by people with disabilities.
- 3.13 Across the development, 90% of residential units are designed to meet M4(2) and 10% (28) designed to meet M 4(3) wheelchair user dwellings.

### **Revisions Post Submission**

- 3.14 The original submission has been amended on four occasions to include the following key changes: reduction in height of tallest blocks from 20 and 15 storeys to 17 and 13 storeys respectively; second staircases added and revised layout to address the Health and Safety Executive's fire safety requirements; a 10m setback from the Thames River to comply with the Environment Agency's flood defence constraints and Block C which fronts Townmead Road was reduced in height by the equivalent of 2 storeys to mitigate daylight and sunlight impacts.

### **Construction Works**

- 3.15 Demolition and construction works are estimated to take approximately 31 months (2.5 years) to complete and allow for enabling and fitting out works. The construction of the proposed buildings would be in a single phase.
- 3.16 Chapter 5 of the Environmental Statement (ES) describes the proposed programme of demolition and construction works, specifically the key activities that will be undertaken prior to the completion and operation of the proposed development. Chapter 5 considers early-stage planning for the management of complex issues such as working near to existing residential property, to busy main roads and in proximity to underground constraints and surface utilities and other infrastructure and forms basis of a Construction Environmental Management Plan ('CEMP') that will be implemented over the duration of construction works.

- 3.17 An Outline CEMP, ES Volume 3, Appendix: Demolition and Construction – Annex 1, has been provided and sets out construction related management/mitigation and monitoring measures described within ES Volume 1, Chapter 16: Mitigation and Monitoring Schedule. The CEMP defines amongst other things, the hours of operation, dust control measures vehicle emission control, a schedule of all plant, nonroad and road mobile vehicles. In addition to the environmental management measures and procedures (such as noise control, protection of ecology and water reserves etc.), consideration shall also be given to construction materials quantities and best practice environmental standards for construction sites.
- 3.18 Subject to the grant of fulling planning permission, the implementation of the CEMP and any other required management plans (e.g. Dust Management Plan, Construction Logistics Plan ('CLP', Site Waste Management Plan (SWMP)) will be secured through appropriately worded planning conditions. It is intended that the CEMP (and other plans, as relevant) will be 'live working' documents, and that the Principal Contractors appointed representative will update the documents accordingly with any amended construction environmental management measures as the Proposed Development progresses. In addition, the site will be registered with the UK's Considerate Constructors Scheme 1.

### **Environmental Impact Assessment**

- 3.19 An Environmental Impact Assessment (EIA) request for a Scoping Opinion, pursuant to Regulation 15 of the Town and Country Planning (EIA) Regulations 2017, was submitted to the Council in July 2021 (ref: 2021/02725/SCOEIA). The EIA scoping letter related to the following development:

'The redevelopment of the site comprising the demolition of the existing structures on-site and the construction of six buildings (A1, A2, A3, B1, B2, and C1) ranging between ground plus 7 to 19 storeys, providing a residential-led scheme comprising approximately 300 units with flexible commercial space proposed at the upper courtyard level and the reprovision of the safeguarded Swedish Wharf located across the ground floor. The residential offering will include a mix of private sale, social rent and affordable intermediate homes.'

- 3.20 The Council's Scoping Opinion was issued on 2 January 2024.
- 3.21 The Environmental Impact Assessment, prepared by Trium (and others), as part of the planning application comprised: ES Volume 1 – Main Assessment; Volume 2 - Townscape and Visual Impact Assessment TVIA accompanied by a full set of views and verified images and Volume 3 Technical Appendices – background data, technical reports, tables, figures and surveys.

### **Other Supporting Documents**

- 3.22 Together with the Environmental Statement, the following supporting documents including revisions have been submitted with the application: -
- Planning Statement prepared by DP9
  - Application Drawings and Schedules, prepared by EPR and Gillespies.
  - Design and Access Statement, prepared by EPR, Gillespies.
  - Statement of Community Involvement, prepared by Concilio.
  - Financial Viability Assessment, prepared by DS2.
  - Affordable Housing Statement, prepared by DS2.



- Daylight and Sunlight: Internal D&S and Overshadowing Report, prepared by GIA.
- Daylight and Sunlight: Impact on Neighbouring Properties, prepared by GIA.
- Energy Statement (including Overheating Analysis), prepared by Twin and Earth.
- Sustainability Statement, prepared by Twin and Earth.
- Whole Lifecycle Carbon Report, prepared by Twin and Earth.
- GLA Whole Lifecycle Carbon Reporting Spreadsheet, prepared by Twin & Earth
- Circular Economy Statement, prepared by Twin and Earth
- Transport Assessment, prepared by Caneparo Associates
- Residential Travel Plan, prepared by Caneparo Associates
- Delivery and Servicing Plan, prepared by Caneparo Associates
- Outline Construction Logistics Plan, prepared by Caneparo Associates
- Residential Site Management Parking Plan, prepared by Caneparo Associates
- Flood Risk Assessment, prepared by WSP
- Drainage Strategy, prepared by WSP
- Ventilation Statement, prepared by Hilson Moran
- Fire Statement, prepared by Hilson Moran
- Safeguarded Wharf Report, prepared by Ramboll and
- Agent of Change Report, prepared by Trium.

3.23 The site is with an Air Quality Dust Management Area and near the GLA Air Quality Focus Area.

## **4.0 PUBLICITY AND CONSULTATIONS**

### **Pre-application**

- 4.1 In accordance with the National Planning Policy Framework (NPPF), the Applicant has undertaken a detailed programme of pre-application engagement with the Council's Planning, Urban Design Officers, and other officers;
- 4.2 In December 2020, the applicants commenced initial formal pre-application discussions in connection with a larger mixed-use redevelopment proposal for buildings ranging between 6 and 23 storeys to provide: 350-380 dwellings (Class C3); a replacement safeguarded wharf; flexible commercial floorspace; new Thames Path; associated hard and soft landscaping; private open space; vehicular access and servicing facilities; car parking and cycle parking; and other works incidental to the proposals.
- The main initial concerns related to: the acceptability of the proposed land uses; the re-provision of the protected Albert wharf; the amount and tenure of affordable housing; the proposed scale of the development; quality of the residential accommodation quality and amenity space; agent of change principles; design and height; and access/deliveries/servicing.
- 4.3 In January 2021, the applicant entered into a Planning Performance Agreement and has been in pre-application dialogue with the Council since January 2021 and the proposals have evolved through various iterations in response to

resident engagement, negotiations with officers and a re-assessment of the proposals by the Applicant Henley Fusion.

### **Pre-Application Public Engagement**

- 4.4 The Applicant has submitted a Statement of Community Involvement (SOI) which sets out the programme of engagement undertaken by the applicant since 2021 between the pre-application period, submission of the original proposal and preparation/submission of revisions to the scheme. Engagement included a range of consultation activities including digital webinar events, in-person public exhibitions, stakeholder meetings, local mailings, and providing surveys for residents.
- 4.5 The Applicants have sought to engage with residents and the site's immediate neighbours through a series of consultation events in the last 3 years. This has allowed the applicant to take into account the views of Council, GLA, key shareholders and the local community when developing the final revised plans submitted in December 2023. The consultation 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 NPPF.
- 4.6 Consultation took place in three phases over a seven-month period between April and October 2021 and was designed to be as accessible as possible at a prior to and after the lifting of Covid restrictions. In addition to social media advertising, individual 15,000 invitations were sent to the local community, encouraging them to take part in digital webinar events, in-person public exhibitions, stakeholder meetings, local mailings, and surveys. A range of consultation activities were undertaken including:
- A consultation website was set up and updated to gather feedback.
  - During the first 3-week consultation phase (April and May 2021), the website received 1,505 views and 61 survey responses. Over 60% of respondents supported the provision of new homes and jobs.
  - The second round (July 2021) of online consultation generated 884 website visits and 31 survey responses. In total, 73% of respondents agreed that the site was in need of regeneration.
  - The third round of consultation (October 2021) was an in-person public exhibition (post Covid restrictions) at Parsons Green Sports and Social Club. The event was advertised via 5,000 flyers and letters to key political and community stakeholders. In total 141 people visited the website, the 13 people attended the event, including representatives from the Peterborough Road Area Residents Association and 6 feedback surveys were completed.
  - Meetings were held with community groups including: Peterborough Road and Area Resident Association; Hammersmith & Fulham Historic Buildings Group; The Fulham Society and Wandsworth Bridge Road Association

- Invitations were sent to the brief the Local MP, LBHF ward councillors in Sands End and Palace Riverside wards and adjacent ward councillors in St. Mary's Park and Fairfield wards in LB Wandsworth. Chelsea & Fulham Meetings with
- 4.7 The feedback from 98 survey responses across 3 phases of consultation highlighted the following:-
- support for on-site affordable housing, an extension to the Thames Path for pedestrians and more green/ biodiverse spaces including private gardens.
  - concerns raised regarding: whether the working wharf would cause disruption; height/ massing; potential overshadowing; increased traffic and parking, particularly on Wandsworth Bridge Road and its busy junction with Carnwarth Road/ Townmead Road.
- 4.8 In response, the applicant's amended their proposals to include:
- 35% on site affordable housing
  - an outline plan to extend the Thames Path on a raised podium, accessible to the public from Wandsworth Bridge Road and featuring public open space
  - a car free permit development with 600 cycle spaces
  - the height was reduced from a maximum 23 to 20 storeys.
  - Outdoor space was increased to provide landscaped courtyards and roof terraces, including new planting to improve the biodiversity of the site.

#### **Design Review Panel**

- 4.9 The emerging proposals were presented to the Design Review Panel in April 2021 (original scheme) and November 2021 (revised proposals).
- 4.10 At the first meeting, the Panel considered the principles of development and highlighted the following main issues: townscape and visual impact; architecture and appearance; public realm and river walk; servicing and deliveries and housing quality/ entrances.
- 4.11 At the second meeting, the Panel welcomed the revised proposals. The Panel considered that significant progress had been made to deal with a complex site. The Panel acknowledged that the integration and retention of the working wharf was a technical constraint and that bringing forward a more comprehensive approach including the development of Comley's Wharf was not an option. Overall, the Panel recommended further refinement of the scheme to ensure a high-quality, robust and durable development is delivered at this prominent location
- 4.12 The Panel raised the following detailed comments:
- Townscape and Visual Impact: Generally, the composition of the scheme could work within views, however the massing and architectural composition of the development require further development to ensure that the development would provide a positive addition to the surrounding townscape. The view from Wandsworth Bridge Road should be carefully considered against the consented scheme on the Hurlingham Retail Park and the massing of the scheme, between the tall buildings and lower blocks should be simplified.

- Architecture and appearance: The palette and coding of the different blocks requires clarity and refinement. In particular, the tall buildings should take a more simplified approach to produce a more vertical emphasis and pronounced crown. The 'warehouse' blocks along Townmead Road would also benefit from refinement through a consistent datum height and the upper lightweight floors of these blocks should be refined to embed these within the main building form. Given the prominence of the site and its riverfront location, quality should be guaranteed from the outset.
- Public realm and river walk: Introduction of the river walk and access to the upper deck of the scheme is encouraging as is the enlargement and re-provision of enhanced areas of public access. The general approach to the river walk and composition to integrate this within the scheme was supported by the Panel and could create a positive contribution to the river frontage and additional activity/interest to the gateway of Wandsworth Bridge. The panel suggested a further review of the pedestrian experience to encourage access to these new spaces and so it's clear that they are public, rather than private spaces. The panel recommended a review of the location of the cores/frontages of the development fronting onto the stepped access, create a better integration of these features with the surrounding public realm.
- Servicing and deliveries: The panel queried the delivery strategy, regarding: the access/servicing requirements of the retained wharf uses, alongside the potential deliveries to the residential component of the scheme; whether the scale of the communal servicing area would meet the proposed requirements; how each of the cores of the building would be serviced and whether deliveries of large goods could be appropriately managed by the current approach.
- Housing quality and entrances: The quality and detailing of cores and entrances should be consistent across the scheme. The updated approach to ensure resident access to podium amenity areas was welcomed by the Panel.

### **Secured by Design**

- 4.13 The applicant met the Metropolitan Police Design out Crime Officer on 25 June 2021 to discuss secure by design principles.

### **Transport**

- 4.14 The applicant met with Transport for London on 30th June 2021 to discuss transport principles.

### **Fire Access**

- 4.15 The applicant met with London Fire Brigade on 8th October 2021 to discuss fire access principles.

### **Viability**

- 4.16 The applicant met with the LBHF planning team including BPS, the Council's independent consultant on 13<sup>th</sup> October 2021 to discuss financial viability principles.

### **Environmental Quality**

- 4.17 The Council's Planning and Environmental Quality officers met the applicant on 12th November 2021 to discuss noise, overheating and air quality.

### **Affordable Housing Tenures**

- 4.18 The applicant met with the Council's Planning and Housing Teams on 17th November 2021 to discuss affordable housing tenures.

### **Greater London Authority**

- 4.19 GLA pre-application meetings on the proposed development took place on 14 May and 10 September 2021. The GLA's follow up pre-application advice note was issued on 22 October 2021 and made the following key comments on the proposals:

- Re-activation of the safeguarded wharf as part of a high density, residential-led mixed use co-locational scheme is supported, subject to the delivery of the proposed safeguarded wharf use being secured and further details relating to the proposed freight-handing capacity and acoustic design and Agent of Change mitigation measures.
- Given the scale of industrial re-provision proposed associated with the re-activated safeguarded wharf, the proposed scheme would be subject to the 35% affordable housing threshold in the London Plan, as the London Plan benchmark for industrial re-provision would be met.
- The design and layout is supported. However, more generous gaps in the massing of recessed linking elements between Blocks A3, A2 and A1 is encouraged to ensure improved sunlight into the courtyard and to provide scope for additional dual aspect units.
- The proposed architecture, materiality and landscaping is of a high standard and is strongly supported.
- The proposed tall buildings will need to be justified. The applicant is required to demonstrate that the proposals accord with the qualitative assessment criteria for tall buildings as set out in Part C of London Plan Policy D9, taking into account the visual, heritage, environmental, functional and cumulative impacts and architectural quality.
- A range of other matters relating to play space, transport, climate change and urban greening should also be addressed

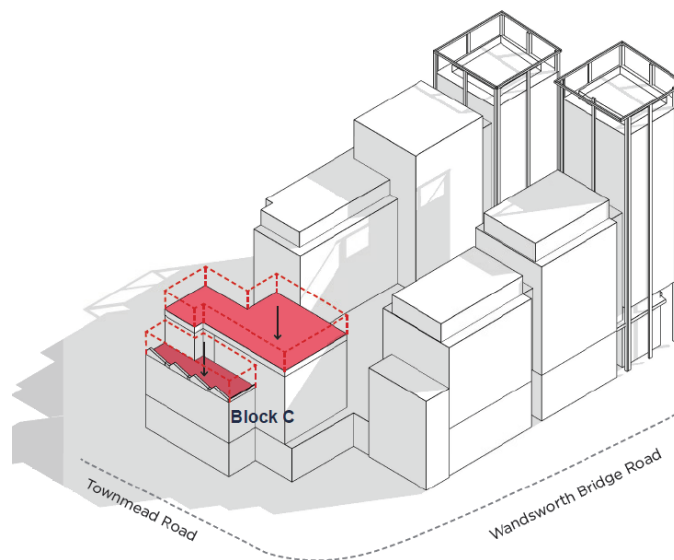
### **APPLICATION STAGE CONSULTATION**

- 4.20 The planning application has been the subject of four separate publicity and consultation stages by the Council as local planning authority, in accordance with statutory requirements.
- 4.21 The application has been advertised on the following basis:
- The scheme comprises a Major Development.

- Accompanied by an Environmental Statement in accordance with EIA Regulations 2017.
- Might affect the character and appearance of neighbouring conservation areas and heritage assets.

#### **Fourth Public Consultation (January 2024)**

4.22 The application was last revised in December 2023. The revisions included amendments to Block C (fronting Townmead Road): the 4th floor was removed; the remaining residential floors between 2 to 7 were compressed to minimise floor to ceiling heights; the parapet heights have been reduced; the mix of flats has changed to include more family units; windows and balconies have moved and a revised daylight and sunlight report has been submitted.



**Image 5: Fourth Round of Public Consultation - Proposed Changes**



**Image 6: Townmead Road – Revised Elevation**

4.23 The latest revisions were publicised in January 2024 by way of 1,750 neighbour letters to individual properties in surrounding buildings or streets (on 4 January 2024). The consultation deadline ended on 18<sup>th</sup> January 2024.

### **Neighbour Representations**

4.24 The fourth round of consultation (following further revisions) generated 26 responses. In summary, the following comments were received:

#### **Objections**

- No need for housing/ lack of affordable units / too many units
- Overdevelopment / scale
- Height/ 17 storey building / impact on skyline
- Design /materials are out of keeping
- Traffic impact / congestion/ delivery vehicles
- Limited public transport and parking; Travel plan required
- Difficult to hire taxis/ Ubers due to traffic restrictions
- No plan for cycle underpass
- Environmental impact
- Air pollution
- Privacy
- Loss of winter sun
- Loss of sunlight/ overshadowing
- Disruption during construction
- Empty properties not for families
- Devalue existing property
- Loss of view
- Right to light / inadequate light
- Quality of life
- Proximity to existing cement works

#### **4.25 Porcelanosa**

- Scale - Welcome reduction to 5 – 17 storeys instead of the 6 – 20 storeys but still results in loss of daylight on southern elevation facing river and the scale remains out of character and contrary to SFRRRA Strategic Policy
- Prejudice future developability of the store in terms of scale – due to impacts on light and privacy of any future occupant.
- Harms visibility of signage - long views of signage would be obscured.
- If planning permission is granted, s106 or conditions should: prevent the insertion of windows / light openings into walls (particularly on Blocks A and C adjacent to the Porcelanosa site) without planning permission; the developer should liaise with/consult Porcelanosa during the construction to ensure that access to the Porcelanosa store is not inhibited and that any damage and dirt to the store is remediated swiftly; replacement Porcelanosa signage at the developers cost to minimise the detrimental economic impacts; and a restriction on the continued use of Loading Bay B within a fixed period following the implementation of the planning permission.

## Environment Agency

4.26 No objections subject to conditions

## TfL

4.27 No objections subject to appropriate conditions and legal agreement.

### THIRD PUBLIC CONSULTATION (FEBRUARY 2023 - MARCH 2023)

4.28 The application was revised in February 2023. The revisions included an amended to the site layout with a setback for the building line of Block A from the river to provide the Environment Agency with 10m clear access to the River Wall, a vehicular access along on the Comley's Wharf boundary to provide fire access and a reconfigured massing.

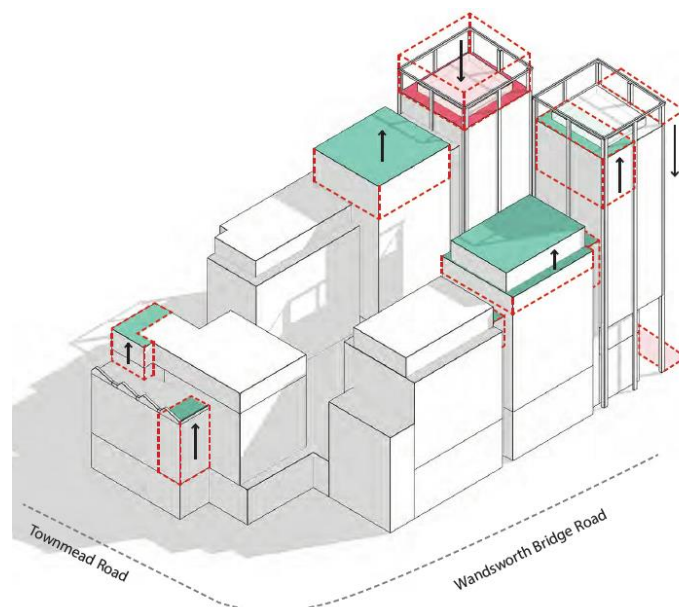


Image 7: Round 3 of Consultation - Proposed Changes

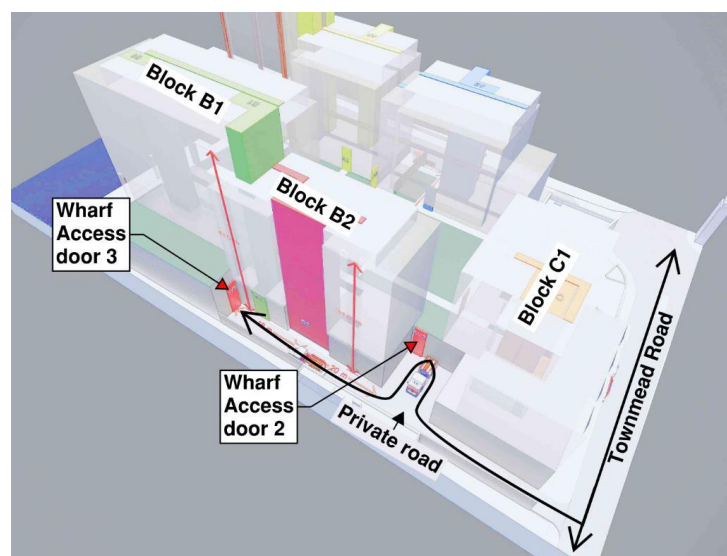


Image 8: Round 3 of Consultation – Proposed Fire Access



4.29 The revisions were publicised between February 2023 - March 2023 by site notices posted around the site, a press advert (published 22 February 2023) and by way of 1,750 neighbour letters to individual properties in surrounding buildings or streets (on 14 February 2023). In summary, the following comments were received:

### **Neighbour Representations**

4.30 The third round of consultation (following revisions) generated 32 responses.

#### **Objections**

In total 29 objection letters on the grounds of:

- Proposed 17 storey height / design
- Residential amenity – light/ overshadowing, noise, traffic, privacy
- Overdevelopment
- Out of keeping/ skyline
- Lack of green
- Traffic/ road capacity
- Car parking
- Cargo bikes
- Unaffordable housing
- Overcrowding
- Stress on local services
- Pollution/ air quality
- Health and wellbeing
- loss of view and right of light
- strain on infrastructure
- access to Thames path and design
- building works
- no commercial space for small businesses
- no good for normal families
- cumulative impact
- not built for local residents
- potential for empty flats

#### **Support**

4.31 One additional letter of support on the grounds of wider community benefit.

#### **Neutral**

4.32 Two additional letter welcoming public access along the Thames path and note that 106 contributions are required.

#### **Health and Safety Executive (HSE)**

4.33 Following discussions in November 2022, the applicant submitted a revised fire statement. On 8 March 2023, the HSE confirmed that they are now content with the fire safety design and raise no objections to the proposals.

#### **Transport for London (TfL)**

4.34 TfL raised no objections to the amended proposals

- The increased cycle provision complies with London Plan policy T5.

- The 2 new vehicular crossings provide better safety implications for disabled parking users and cyclists to access the building; however this leads to a decrease in pedestrian amenity along Townmead Road contrary to London Plan Policy T2 (Healthy Streets). As Townmead Road is a borough highway, the revised layout should be agreed with LBHF.
- A financial contribution would secure Wandsworth Bridge/Townmead Road junction improvements in accordance with London Plan policy T1.
- A Stage 1 Safety Audit of the proposed changes to road layout should be agreed with LBHF. Hammersmith and Fulham officers.

### **Port of London Authority (PLA)**

4.35 PLA supports the proposed development subject to the appropriate conditions, after agreeing appropriate floor loadings for the wharf (to ensure the long-term use and viability of the wharf):

Navigation – After reviewing the updated preliminary Navigational Risk Assessment (NRA) the PLA considers that the finalised scheme will need a full, detailed NRA to fully reflect the operation and set any required conditions. A detailed NRA will be secured by condition and will include a detailed passage plan and operational plan to show that a full assessment has been made on the impact of navigational safety in the area.

Safeguarded Wharf Designation - Swedish Wharf is one of a finite number of strategically important Safeguarded Wharves on the River Thames in London and subject to Ministerial Directions and the relevant policies within the 2021 London Plan, including policy SI15. The PLA is fully supportive of the maximisation of use 3 of Swedish Wharf for waterborne cargo freight handling up to 24 hours a day in line with its designation and extant planning policy.

The submitted 'Safeguarded Wharf Statement of Conformity' as part of the amended application highlights that the built floorspace of the industrial wharf box has been reduced. However, the overall safeguarded wharf area remains 5,345 m<sup>2</sup> and the updated design forms an improvement over the previous with the introduction of the fire access road and improved access arrangements. Therefore, the PLA consider that the policy test requirements contained within policy SI15 of The London Plan will be met as a result of the proposed development, particularly with regard to ensuring that the existing and potential capacity and operability of the safeguarded wharf is retained, nor constrain the long-term use and viability of the wharf.

Transport Assessment – the PLA welcome that the amended Transport Assessment which continues to highlight that both the Light Freight and Heavy Freight scenarios for safeguarded wharf operations assume 24-hour operation of the wharf. To remain in conformity with London Plan policy SI15 it is vital that the reactivated safeguarded wharf continues to have the ability to be able to operate for 24 hours a day in line with tidal movements, to ensure that the long-term use and viability of the wharf is not negatively constrained both now and into the future.

### **Environment Agency (EA)**

4.36 The EA raise no objections to the amended proposals as applicants have demonstrated that; the flood defence wall will be replaced with a new wall designed for the lifetime of the development; the buildings will have a minimum

setback of 10m at ground level which change to 9.70 metres at higher floors; the new flood defence will be structurally independent of any proposed buildings and the 900mm secant piles will have a 120-year design life. These details will be secured by condition.

#### **Thames Water (TW)**

- 4.37 TW raise no objections in respect of waste, the proposed development is located within 15 metres of a strategic sewer and TW requests that
- a condition be attached requiring a piling method statement.
  - that petrol / oil interceptors be fitted in all car parking/washing/repair facilities to prevent oil-polluted discharges entering local watercourses
  - all water network upgrades required to accommodate the additional demand to serve the development have been completed or agreed by TW
  - informative be attached stating that the developer should take account of TW minimum water pressure in the design of the proposed development.

#### **Thames Tideway Tunnel (TTT)**

- 4.38 TTT No objection subject to an informative that the developer read their guidelines to assist developers working close to Tideway Infrastructure.

#### **Metropolitan Police Secure by Design (SBD)**

- 4.39 The Met Police raise no objections and provide a set of security recommendations regarding the site/ layout / design and suggest further consultation once the detailed design stage is reached and that the development should achieve SBD accreditation when completed. The design should include
- Site Layout / Design: well defined building boundary with appropriate fencing/ railings; clearly defined communal spaces with a management strategy/ signage; lighting strategy; CCTV monitoring; planting should not impede the opportunity for natural surveillance and avoid hiding places; sustainable furniture on communal areas discourages ASB; clear sight lines
  - Building Envelope: no linkage between public, private and commercial areas; secure lobbies at the residential entrances with the lifts/stairs behind a secondary access/egress door; outer residential and secondary communal doors should be self-closing and meet specific security rating with fob access linked to individual residential units; communal postal strategy for secure lobbies or through the wall; use of access control at each floor is recommended; all door sets allowing direct access into the flats as well as easily accessible windows/ balcony doors should be SBD approved and certificated; balconies close to one another should have privacy frosted or glazed screens; private ground floor terraces/ those facing the public space should have defensible landscaping without hindering surveillance; basement car park should be separated, private and public spaces with full height, fob access controlled self-closing gates with an appropriate opening time; fob access from basement car parking to residential cores via security rated doors; fob access security rated doors into cycle and bin stores with a good lighting scheme; CCTV & lighting strategy around the building, basement car park and communal areas, including entrances & exits, postal strategy, cycle and bin stores, all footpaths, communal, podium and associated areas to main building; management strategy for podium shared amenity spaces

#### **Historic England (HE)**

- 4.40 HE raised no objections

### **London Heliport (LH)**

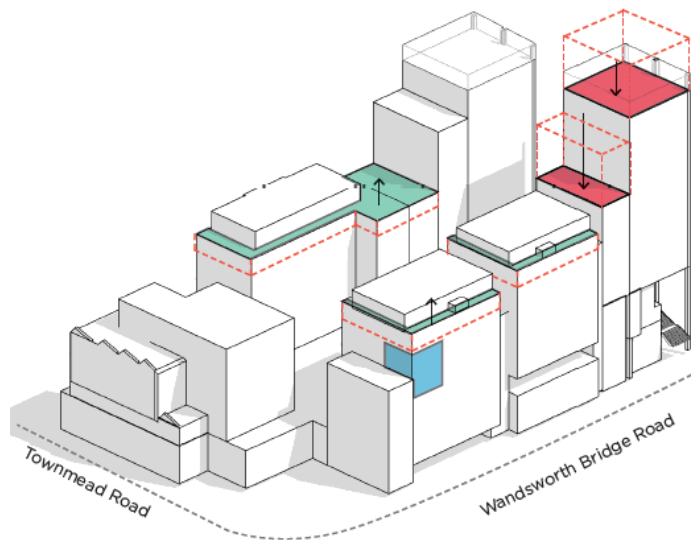
4.41 LH raise no objections subject to conditions regarding the installation of cranes in accordance with CAA guidelines/ consultation and that the tallest buildings be fitted with aviation lighting to give visual guidance to pilots on grounds of safety.

### **Civil Aviation Authority (CAA)**

4.42 CAA raise no objections

## **SECOND PUBLIC CONSULTATION (JULY 2022 – AUGUST 2022)**

4.43 The application was revised in July 2022. The revisions included a reduction in the height of tallest building from 20 storeys to 17 storeys, a reduced quantum of residential units and various amendments to the detailed design.



**Image 9: Second Round of Public Consultation – Proposed Changes**

4.44 The revised application was re-publicised between July 2022 – August 2022 by site notices posted around the site, a press advert (published 20 July 2022) and by way of 1,750 neighbour letters to individual properties in surrounding buildings or streets (on 14 July 2022). The following summary representations were received:

### **Neighbour Representations**

4.45 The second round of consultation (following revisions), generated an additional 6 objections on the following grounds:

- Height is excessive/ impact on skyline
- Traffic
- Inadequate public transport
- Daylight and sunlight
- Air quality
- Construction noise, dust and disturbance
- Densely populated
- Cumulative impact of development

### **Greg Hands MP**

- 4.46 Considered that the revisions included no substantial changes and maintained his original objections

### **Cemex, Comleys Wharf**

- 4.47 Objection the proposals on the following summary grounds: noise; transport impact; marine jetty and its navigational and environmental impacts; agent of change principle; impact on future development and prospective residential occupiers at Albert & Swedish and Comley wharves.

### **Greater London Authority (GLA) Stage 1 Report**

- 4.48 The GLA generally support the application, but it does not yet fully comply with the London Plan. However, the possible remedies set out in this report could address these deficiencies.

- a) Land use - re-activation of the existing safeguarded wharf as part of a high density, residential-led mixed use scheme is supported subject to the delivery of the wharf being secured, including the freight handling capacity and the agreed agent of Change mitigation measures, with any road safety issues addressed.
- b) Housing and affordable housing – support 35% affordable housing with a 49:51 tenure split between social rent and intermediate housing (by habitable room). Given the quantum of industrial floorspace, the scheme could be eligible for the Fast Track Route, subject to LBHF borough being comfortable with the proposed tenure split. The proposed housing affordability and play space provision is acceptable, subject to S106 obligations being secured.
- c) Urban design and heritage – strong support for the design, layout, landscaping and public realm. Public access along the Thames Path and spill out publicspace should be secured. The residential quality is acceptable. The height and massing strategy which includes tall buildings is supported and the proposals would not harm any designated heritage assets or views. The application complies with locational and plan-led principle set out in London Plan Policy D9 on tall buildings. In terms of the qualitative criteria for tall buildings, the architectural and materials quality and the visual, heritage, functional, environmental and cumulative impacts are acceptable. Although a moderate degree of further refinement to the detailing and appearance of the rear and side elevations of the towers should be considered. Conditions are required to secure residential and environmental quality, inclusive design and fire safety.
- d) Transport - A financial contribution should be secured to facilitate Healthy Streets improvements at the adjacent junction and pedestrian crossing point on Wandsworth Bridge Road. The net increase in HGV trips can be accommodated on the strategic road network, but road safety implications must be mitigated. A Road Safety Audit is required as well as a Wharf Operational Management Plan to ensure that the timing and number of HGV movements is managed. Further details of the cycle parking should be provided to demonstrate compliance with the London Cycling Design Standards. A Parking Design and Management Plan, Delivery and Servicing Plan, Construction Logistics Plan and Travel Plans are required by condition. If the wharf is used for last mile logistics / freight uses which rely on the distribution of goods by vans / small HGVs, it is important to incorporate the potential for rapid electric charging, given the air quality benefits.

e) Climate change and urban greening - The energy, urban greening and drainage strategies are supported. The approach to noise mitigation is acceptable and is in line with the Agent of Change principles. The provision of noise and air quality mitigation measures, including mechanical ventilation and winter gardens should be secured.

### **Health and Safety Executive (HSE)**

4.49 The HSE raised the following significant concerns on 10 August 2022:

- a) Fire service access and facilities - inadequate fire service access arrangements and firefighter travel distances to blocks B1 and B2 which will hinder firefighting operations.
- b) Means of escape - drawings show the single staircase serving block C1 descends to the basement; single residential staircase should not descend to a basement level due to the risk posed to the only means of escape.

4.50 On 23 September 2022, following the submission of the applicants revised Fire Safety Statement (23 August 2022) with a package of fire precautions to support the design proposals, the HSE issued concluded that:

- The revised proposed site layout, landscaping, spatial coordination and package of fire precautions do not provide reasonable fire service access and facilities. Design changes necessary to provide reasonable fire service access and facilities will affect land use planning considerations such as site layout, landscaping and appearance of the development.

4.51 On 23 November 2022, the HSE had a joint follow up meeting with the applicant and LBHF planning officers to find an acceptable way forward.

### **Port of London Authority**

4.52 Subject to appropriate conditions the PLA supports the proposed development made the following additional comments: The development fulfils the policy test requirements contained within policy SI 15 (Water Transport) of the London Plan. In order to continue to comply, particularly, there is a need for the provision of further detail via condition on the required mitigation measures to ensure that prospective future occupiers are protected, and that prospective and existing wharf operators can continue to operate at full capacity without the risk of complaint.

### **Cemex, Comleys Wharf**

4.53 Objection the proposals on the following summary grounds: noise; transport impact; marine jetty and its navigational and environmental impacts; agent of change principle; impact on future development and prospective residential occupiers at Albert & Swedish and Comley wharves.

## FIRST PUBLIC CONSULTATION (DECEMBER 2021 – JANUARY 2022)



Image 10: Round 1 of Consultation

4.54 The application was publicised by way of site notices posted around the site, a press advert (published 16 December 2020) and by way of 1,750 neighbour letters to individual properties in surrounding buildings or streets on (22 December 2020). In summary the following comments were received:

### Resident Groups and individuals

#### Objections

4.55 In total, 59 objections were received from residents and individuals on the grounds of:

- No demand for development
- Design, height and massing; too large and out of keeping
- tallest building is too high; does not relate to adjacent buildings
- adverse harm to riverscape
- building line on Townmead Road
- too many flats
- affordability and empty flats
- insufficient on-site parking and inadequate vehicular access
- traffic generation and impact on road junction
- cycle parking facilities should be secure
- construction noise and traffic
- pedestrian/ road safety; no pedestrian-controlled crossing at junction
- insufficient public transport
- air /dust pollution and asthma
- loss of light/ overshadowing
- loss of privacy
- noise
- drainage/ SUDS
- proposals contrary to South Fulham Riverside SPD (2013)
- lack of trees

- loss of river view
- right to light
- cumulative construction works
- lack of green
- flats purchased off-plan by investors rather than targeted at residents

#### Letters of Support

4.56 In total, 7 letters of support were received and included the following summary comments:

- site has been an eyesore for decades; it is in disrepair and poorly used
- development will improve Wandsworth Bridge/ Townmead
- support high density development
- s106 contributions will improve road safety at dangerous junction with cycling and pedestrians prioritised
- much needed housing including affordable housing
- creation of jobs
- Thames Path extension

#### Neutral Letters

4.57 In total, 6 letters neither objecting nor supporting on made the following summary comments:

- Neglected site; proposals result in significant improvement
- broadly welcome development;
- maintaining a working wharf is welcome; doubt proposed uses are sustainable
- unclear how many parking spaces
- welcome the river walk
- support pedestrian crossing improvements at Wandsworth Bridge junction
- would welcome an underpass under the bridge to the Thames path and a range of shops and cafes facing the Thames to benefit the community.
- opportunity for trees and living walls to make the area much nicer.
- Consider impact on water table and riverbank
- an assessment of how alternative water transport will be used to could help to minimise HGV movements could help mitigate this.

#### **Greg Hands MP**

4.58 Reuse of underused site/ wharves is welcomed but raise objections on the grounds of:

- proposed 20 storey height of tallest buildings; the previous consent 2014/03250/FUL was between 5 and 13 storeys
- visual change to the waterfront, surrounding area, skyline and that would dominate the entrance to Fulham at Wandsworth Bridge Road
- additional residential units (281) compared to previous permission (233) could have adverse effects on the local community and infrastructure.
- inappropriate housing location adjacent to existing cement works.
- impact on local road network; no off-street parking for residents or visitors



### **Fulham Society**

4.59 Welcome development on this site, and the retention of the working wharf but raise the following concerns:

- very tall tower adjacent to the bridge constitutes over-development in terms of height and bulk; would prefer a less dominant building on the bridge and have the taller tower set to the east of the site.
- Materials should have a minimal warehouse effect, without the intrusive contrasting mansard extensions.
- vehicular access - dropping off arrangements, unless access to the site and drop-off and delivery are well controlled because Townmead Road and Imperial Road are not accessible for through traffic, go via the heavily trafficked Wandsworth Bridge junction and will increase traffic at the Sainsbury roundabout on Townmead Road.
- river walk - there is plenty of space between the river and development on the Albert Wharf site for a seated planted area with a walkway to the end of the Swedish Wharf site rather than the proposed virtually inaccessible upper area that is set back from the river. In addition, a path could be made between Swedish Wharf and Comley's Wharf to allow people to walk back to Townmead Road.

### **Wandsworth Bridge Road Residents Association**

4.60 Supports the proposals in principle and welcome a car free development but objects on the grounds of:

- traffic and pollution;
- impact of HGV traffic during construction and associated air pollution (alternatives should be explored eg barges on the river as per Thames Tideway scheme);
- inadequate SUDS/ permeable ground and management of flood risk;
- biodiversity is disappointing - the central square is too small with limited light and limits tree planting and nesting opportunities for swallows and bats (bird/ bat boxes could be incorporated into the design);
- limited general public access along Wandsworth Bridge Road due to blank façade which should be softened or opened to commercial uses;
- no public access to the gated square;
- encourage Cargo bikes and care permit free development;
- maximise insulation, minimum heating and water-use;
- the affordable housing element should be clearly defined and its' building spec should match the rest of the development and any s106 funding must be allocated to the community of South Fulham rather than elsewhere in the borough

### **Porcelanosa UK**

4.61 Object to the proposals on the following grounds:

- height - results in a significant change to the street scene, immediate environment and character of Sands End Conservation Area; proposals do not accord with the South Fulham Riverside Regeneration area.
- lengthy construction period of 31 months causing noise, dust, disruption to operation of business, solar glare/ overshadowing/ loss of light/ potential damage to glazed showroom
- additional traffic - during construction and operational phases could cause misuse of Porcelanosa's car park and deter customers

- obscures established long range signage - facing the river and a replacement sign should be provided at the developers cost

### **Cemex UK (Comley's Wharf)**

4.62 Object to the proposals on the following noise grounds: based on the information available, it's not possible to establish whether or not the CEMEX site noise is a dominant feature of the noise climate at the proposed development site.

### **Statutory Consultees**

#### **Transport for London (TfL)**

4.63 TfL did not raise objections and made the following summary comments

- a) ATZ, Healthy Streets and Vision Zero - the existing junction at Wandsworth Bridge Road, Townmead Road and Carnworth Road has no formal crossing facilities for pedestrians or cyclists. To mitigate the development impacts, TfL requests that LBHF secure a financial contribution towards pedestrian and cycling facilities at this junction in line with Healthy Streets.
- b) Access and Parking – this car permit free development is welcomed; a Parking Management Plan should be secured to address access to **9 disabled** spaces with electric charging points. The additional residential vehicular access from Townmead Road to access disabled spaces/ 3 delivery bays will require a new vehicle crossover (secured by s278 agreement with LBHF). Arrangements on Townmead Road for taxis/ short stay servicing vehicles should be clarified.
- c) Cycling – the on-site 509 long-stay cycle spaces and 16 short-stay spaces accord with London Plan and 16 spaces are located in the public realm areas to serve the non-residential units. Cycle lifts should demonstrate compliance with the London Cycle Design standards and details should be secured by condition.
- d) Trip Generation - TfL will confirm if any mitigation is required when trip generation details are provided.
- e) Wharf Use – support principle of river-based movement which would contribute to the reduction of road-based movement of cargo. To support carbon free travel, hydrogen refuelling and/or rapid electric charging points should be provided. The development should embrace sustainable last-mile movements, including cycle and electric vehicle. Where not suitable, the additional HGV movements would need to mitigate their impacts through limits on their movements in peak hours/ sensitive times e.g. school pick-up/ drop-off. A Wharf Operational Management Plan is required to manage HGV movements for the lifetime of the development, in line with recommendations in the road safety audit.
- f) Travel Plan - the Travel Plan contains mode share targets; the targets encourage higher active mode use and anticipates an increase in active travel over public transport use of 6%. The final TP and all agreed measures should be secured by legal agreement.

- g) Management Plans - A Construction Logistics Plan (CLP), Delivery and Servicing Plan (DSP) for the residential and ancillary commercial space, and a Wharf Operational Management Plan will need to be secured by condition.

**Port of London Authority (PLA)**

4.64 The PLA raises no objections to the proposed cargo use, and the extension to the river walk subject to conditions and informatives. The PLA is fully supportive of maximising the use of the safeguarded Swedish Wharf for waterborne cargo freight in line with its designation. The proposed waterborne cargo handling 'box' (with residential uses above) would result in a reactivation freight-handling with no reduced capacity in line with Ministerial Direction.

- a) Noise - additional information is required including: a more detailed noise assessment to ensure that prospective future users are protected, and that prospective wharf operators are able to operate at full capacity without the risk of complaint; mitigation measures for balconies, particularly on southern boundary and whether the proposed glazing insulation needs to be greater than currently specified. These details can be secured by condition.
- b) Transport – Chelsea Harbour Pier River bus services are in close proximity to the as well as Plantation Wharf on the south side of the Thames within walking distance to/from the proposed development. Both river bus stops should be highlighted within the associated welcome packs for the development and travel plan. The PLA support the potential to utilise the Thames to transport construction material/ spoil through the Construction Environment Management Plan (CEMP) and Draft Construction Logistics Plan (DCLP).
- c) Air Quality - confirmation is required to demonstrate that any operations in the wharf box do not eliminate ventilation requirements to ensure that any potential adverse effects that arise are adequately mitigated, in line with the Agent of Change principle.
- d) Navigation - the PLA agrees with the preliminary Navigational Risk Assessment (NRA) based on assumptions provided by the PLA; the proposed jetty would be of benefit to the safeguarded wharf and improve navigational access. The full NRA must include a detailed passage plan and operational plan to show that a full assessment has been made on the impact of navigational safety in the area as well as ongoing monitoring/ maintenance of the marine works to the riverbed fronting these wharves.
- e) Ecology - there are several habitat enhancements proposed under the recommendations section of the Preliminary Ecological Appraisal (PEA). These proposals are supported, and it is recommended that the implementation of these are secured by planning conditions together with the Habitat Management Plan / Landscape Management Plan.

### **Environment Agency (EA)**

4.65 The EA raised objections to the proposals on the grounds the following grounds:

- a) Flood defences – the applicant needs to demonstrate that the riverwall has sufficient capacity to support the proposed operations/structures for the lifetime of the proposed development. Otherwise, the applicant needs to put forward a remediation/replacement strategy to meet the required design life.
- b) Proximity to Flood defence Line - The proposed Blocks A1 and B1, are within approximately ten metres of the riverwall. Also, the primary columns and stairs of Block A1 are directly above buried elements; and all proposed structures should be 3 metres from any buried elements which form part of the flood defence. The position of buried elements will need to be confirmed by ground investigation and the proposed structures set back accordingly.
- c) Marine Jetty – it is unclear how the marine jetty will tie into the existing flood defence line. The Applicant needs to demonstrate how the flood defence line will be raised (to 6.35m AOD) while ensuring usability of the safeguarded wharf.
- d) Landscaping - planting trees within 16 metres of flood defence will require root protection and the trees cannot be positioned directly above any buried elements.
- e) River restoration - there is no baseline assessment included or enhancement provided. Plans should be provided to address significant aquatic ecological enhancement; this should ideally include a setback.

### **Health and Safety Executive (HSE)**

4.66 HSE that the fire statement be resubmitted to address all the particulars specified in the Secretary of State template after 1 August 2022.

### **Metropolitan Police - Crime Prevention Design**

4.67 The Designing Out Crime Officer raises no objection to the proposal, subject to Secured by Design (SBD) principles being incorporated into the layout and design of this development. The Designing Out Crime Officer made the following recommendations relating to:

- a) Site Layout / Design  
Robust fencing/railings on building boundaries; communal management strategy and signage to prevent unrestricted public access; lighting strategy (designed by an engineer) with no light pollution or glare; CCTV; link with lighting strategy and LBHF control room if necessary; planting should not impede natural surveillance nor create hiding places; communal area furniture that does not encourage ASB; clear sight lines/ redesign of any 'hidden' alcoves.
- b) Building Envelope  
No linkage between public, private and commercial areas; secure residential entrance lobbies with the lifts/ stairs behind a secondary access/egress door to prevent tailgating; security rated outer and secondary residential communal doors that are self-closing/ locking with fob access controlled with audio / visual

access to the individual residential units; no trade buttons; communal postal strategy (secure lobbies or through the wall); access control at each floor; SBD certificated doors/easily accessible windows to balconies or an agreed equivalent; balconies close to one another should have frosted or glazed screens; private ground floor terraces and those facing the public space should have defensible landscaping space without hindering surveillance; basement car park should be separated from private and public spaces with full height, protected fob access for controlled gates; exit/fire buttons far enough away so that it can't be pushed with a stick from outside; self-closing car park gates and fob access with security rated self-closing/ locking doors from the basement to the residential cores; security rated doors to cycle/ bin stores; bike storage only be accessed from inside the cores; CCTV & lighting strategy operating set times to prevent ASB.

- c) Further consultation is encouraged once the detailed design stage is reached and planning permission is granted, to discuss any aspect of the SBD accreditation.

#### **Thames Water - Development Control (TWDC)**

4.68 TWDC raise no objections subject to recommended conditions and informatives.

#### **Thames Water Thames Tunnel Team (TWTTT)**

4.69 TWTTT raise no objections subject to a recommended informative.

#### **Greater London Archaeological Advisory Service (GLASS)**

4.70 GLASS raise no objections subject to appropriate conditions and informatives.

#### **British Airports Authority (BAA)**

4.71 BAA raise no objections. However, if a crane is needed for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane, as per the requirements set out by CAP1096. <https://publicapps.caa.co.uk/modalapplication.aspx?appid=11 & mode=detail & id=5705> purposes BAA draw your attention to the following:

#### **Oxford City Council (OCC) - Thames Path Manager**

4.72 OCC raise no objection subject to the following comments:

- the extension of the Thames Path River walk within the site is a benefit
- the Thames Path should be step free but the provision of a lift provides that accessibility benefit for all users, and it should be clearly sign posted and available at all times.

## **5.0 ENVIRONMENTAL STATEMENT**

### **Environmental Statement**

5.1 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and The Marine Works (Environmental Impact Assessment, as amended) Regulations 2017 sets out procedures for EIAs. The EIA applications are divided into Schedule 1 and Schedule 2 applications under the EIA Regulations.

5.2 Schedule 1 developments constitute those that are likely to have significant effects on the environment, such as major chemical or petrochemical projects and construction of ground or air transport infrastructure, and for which EIA is mandatory. For all other developments in Schedule 2, the need for an EIA is determined based on the following:

- It is within one of the classes of development stated in Schedule 2; and
- either it exceeds the applicable threshold criteria for that class of development in Schedule 2; or any part of the development is to be carried out in a 'sensitive area<sup>3</sup>'; and
- it is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

5.3 Schedule 2 Part 10(b), states that for urban projects which include more than 150 dwellings, the development should be screened for the potential for their environmental effects. Unlike the EIA Regulations, there are no formal thresholds within the Marine Works EIA Regulations, and therefore professional judgment is required to establish if the works have the potential to have significant adverse effects on the marine environment. The proposed development exceeds 150 dwellings and taking into account the scale and nature of the development there is the potential for significant environmental effects.

5.4 Based on the above, the proposed development is considered to constitute 'EIA Development' and the applicant's consultant, Trium LLP submitted an Environmental Statement (ES) dated Nov 2021 in relation to the original submissions involving demolition and new buildings ranging from 6 to 20-storeys in height. The submitted ES describes the likely significant effects of the proposed development during demolition and construction, and on subsequent completion and operation. The ES comprises three technical volumes: the main report; townscape and visual impact, and technical appendices.

5.5 Volume 1, the Main Report comprises the following non-technical and technical chapters:

- Chapter 1. Introduction
- Chapter 2. EIA Methodology
- Chapter 3. Alternatives & Design Evolution
- Chapter 4. The Proposed Development
- Chapter 5. Demolition and Construction
- Chapter 6. Traffic and Transport
- Chapter 7. Air Quality
- Chapter 8. Noise and Vibration
- Chapter 9. Wind Microclimate
- Chapter 10. Daylight, Sunlight, Overshadowing and Solar Glare
- Chapter 11. Geo-environmental and Ground Conditions
- Chapter 12. Water Resources, Flood Risk and Drainage
- Chapter 13. Built Heritage
- Chapter 14. Effect Interactions
- Chapter 15. Likely Significant Effects and Conclusions
- Chapter 16. Mitigation and Monitoring Schedule

- 5.6 Volume 2, Townscape and Visual Impact Assessment comprises a full set of views and verified images.
- 5.7 Volume 3, Technical Appendices comprises background data, technical reports, tables, figures and surveys.

### **EIA Process**

- 5.8 The EIA identifies the likely significant environmental effects (both beneficial and adverse) of a development. It aims to prevent and, where prevention is not possible, to reduce and/or mitigate any significant adverse environmental effects, where these are identified, and to enhance any beneficial effects. Overall, it proactively seeks to integrate mitigation within the development proposals to avoid significant effects from arising.
- 5.9 The ES has been prepared in accordance with applicable legislation, guidance, and case law for the preparation of such documents. Specifically, this ES has been undertaken in accordance with the Institute of Environmental Management and Assessment (IEMA) Quality Mark indicator checklist and with due consideration to the following:
- Interpretation of the proposed development plans as well as the formulation of assumptions in the absence of information, as the basis for the individual technical assessments
  - Consultation with key statutory and non-statutory stakeholders on the issues to be considered within the EIA.
  - Collection, use and assessment of the most up-to-date baseline information and likely evolution of that baseline without the amended proposed development or in the future.
  - Use of relevant guidance and good practice methods to predict the likely nature, scale and significance of any environmental change; and
  - Reporting of the results of the EIA process in the ES in a transparent way, to provide the information required to inform the decision-making process.

### **EIA Scoping**

- 5.10 An Environmental Impact Assessment (EIA) request for a Scoping Opinion, pursuant to Regulation 15 of the Town and Country Planning (EIA) Regulations 2017, was submitted to the Council in July 2021 (ref: 2021/02725/SCOEIA). The EIA scoping letter related to the following development:

‘The redevelopment of the site comprising the demolition of the existing structures on-site and the construction of six buildings (A1, A2, A3, B1, B2, and C1) ranging between ground plus 7 to 19 storeys, providing a residential-led scheme comprising approximately 300 units with flexible commercial space proposed at the upper courtyard level and the re-provision of the safeguarded Swedish Wharf located across the ground floor. The residential offering will include a mix of private sale, social rent and affordable intermediate homes.’

- 5.11 The Council’s ES Scoping Opinion was issued on 2 January 2024 with no requests for additional technical assessment chapters to be included in the ES. The scoping

in of disciplines/ topic areas requires their inclusion in the ES that must accompany a subsequent planning application for an EIA development.

5.12 The following disciplines were 'scoped in'

- Air Quality
- Built Heritage
- Climate Change
- Daylight, Sunlight, Overshadowing and Solar Glare
- Geo-environmental (Land Contamination, Ground Conditions, Groundwater and Soils)
- Noise and Vibration
- Traffic and Transport
- Townscape, Heritage and Visual Assessment TVIA
- Wind Microclimate

5.13 The topics scoped out included the following:

- Archaeology
- Aviation
- Daylight, Sunlight and Overshadowing - Internal, new receptors within the Proposed Development
- Ecology and Biodiversity
- Greenhouse Gas Emissions (GHG)
- Health
- Socio-Economics
- Light Pollution
- Project Vulnerability, Major Accidents and Natural Hazards
- TV Radio Interference
- Waste and Materials
- Water Resources, Drainage and Flood Risk
- Format and Content of the EIA
- Cumulative Schemes

### **The Environmental Statement**

5.14 The ES and its subsequent revisions identify the nature of the proposed development and the likely environmental effects. It also presents the measures proposed to eliminate, reduce, or mitigate any likely significant adverse effects on the environment (referred to as 'mitigation' measures). The ES identifies environmental impacts and the effects during the demolition and construction phase, and on completion and occupation of the proposed development.

5.15 A technical assessment of each scoped-in discipline is set out within a respective chapter of the ES. In each chapter, a description of the assessment methodology is given together with the existing site conditions.

5.16 This is followed by an assessment of the likely effects of the proposed development, taking into account mitigation measures that are embedded in the development proposals; the consideration of the need for additional mitigation or any recommendations for enhancement measures to reduce or offset any



significant adverse effects identified during the assessment. A concluding assessment is then provided on the residual effects that would remain after these measures have been implemented.

- 5.17 The 'scale' of the predicted effects has been classified according to their scale. The definitions of the scale used follow either that set out below, or as specified within the individual technical ES chapters:
- Negligible – Imperceptible effect
  - Minor – Small effect of no significant consequence
  - Moderate – Medium effect (limited extent, duration, magnitude)
  - Major – Large effect (considerable extent, duration, magnitude; may be in breach of recognised acceptability, legislation, policy or standards)
- 5.18 The definitions of the 'nature' of the resultant minor, moderate or major effect are defined as follows:
- Neutral: no noticeable beneficial/ adverse effect or neither beneficial/adverse overall
  - Beneficial: positive effect to an environmental / socio-economic resource or receptor
  - Adverse: negative effects to an environmental / socio-economic resource or receptor.
- 5.19 Once the effect has been identified, the assessment then determines whether the effect is considered 'significant' or 'not significant'. If a significant adverse effect is identified, measures are required to reduce or remove the effect; these measures are referred to as 'mitigation measures'. Once the mitigation measures have been identified, the effect is re-assessed to understand whether the scale of the effect has changed because of the mitigation measures (referred to as 'residual effects').
- 5.20 As well as assessing the impacts of the proposed development on its own, effects resulting from a combination of the proposed development and other surrounding development schemes (known as 'cumulative schemes') are also assessed. The combination of lots of different effects from the proposed development on a single receptor are assessed as well, and these are referred to as 'effect interactions'.
- 5.21 All of the likely effects are reported within the ES (November 2021) and the likely significant beneficial, adverse and neutral residual effects (after mitigation measures) are specifically highlighted. The submitted non-Technical Summary of the ES sets out a summary of the likely significant effects with the detailed assessment being contained within each relevant technical topic assessments of the ES (Volumes 1-3).

### Demolition and Construction

- 5.22 The demolition and construction works are anticipated to take approximately 31 months, commencing with site establishment and any necessary surveys and investigations, before demolition of the existing structures commences. The construction works are expected to comprise of the following main sub-stages:
- Enabling Works and Demolition;
  - Piling and Substructure (i.e. basement construction);
  - Superstructure (i.e. above ground construction);
  - Envelope and Cladding;

- Fit Out;
- Commissioning and Close Out; and
- External and Landscaping Works, including the proposed marine deck.

5.23 Prior to the start of the enabling and demolition works, discussions with LBHF and other relevant consultees (such as Transport for London) will be undertaken in relation to demolition/ construction logistics and demolition/ construction environmental management plans before any demolition works on-site. These would be secured by conditions.

5.24 The demolition and construction of the proposed development will result in an increase in daily total traffic by no higher than 1% with all construction traffic using Townmead Road. The increase in the absolute numbers of heavy goods vehicles is low with no more than 22 heavy goods vehicles on any road during the peak hours, and a total of 110 heavy goods vehicles across the day. There will be an increase in the number of vehicles (a maximum of a 39% increase) on roads surrounding the proposed development due to construction traffic.

5.25 No significant adverse effects will therefore occur as a result of the small increase to traffic on the network to car drivers (in terms of severance, delay, accidents and safety); pedestrians and cyclists (in terms of delay, amenity, fear and intimidation); underground, rail and bus networks due to changes in capacity or in barge movements as a result of demolition and construction activities associated within the Proposed Development.

5.26 The assessment undertaken has shown that the impact of construction traffic on the study area will be negligible. As a result, no additional physical off-site highway improvement measures will be required and no management measures over and above those that have been covered previously have been identified as being necessary to accommodate the demolition and construction phase of the Proposed Development. An Outline Construction Logistics Plan has been submitted with the planning application. A Detailed Construction Logistics Plan would be prepared by the Contractor prior to commencement on-site to control the potential impacts of the construction process including construction traffic as well as noise and air impacts.

### Cumulative Effects

5.27 A total of 21 cumulative schemes were considered. The cumulative effects of these schemes coming forward in conjunction with the proposed development were assessed for each of the technical disciplines presented above. The proposed development would result in regeneration, reinstate a protected wharf, provide housing (including affordable housing) and will lead to employment opportunities and other direct and indirect socio-economic benefits that would otherwise not be realised should the site be left in its current state.

5.28 During demolition and construction there is the potential for a temporary significant adverse cumulative effect to occur in relation to construction noise at Dwyer House and 360 Wandsworth Bridge Road as a result of cumulative construction noise and vibration from the proposed Development and the adjacent Hurlingham Retail Park development. It is noted however that this is based on a reasonable worst-case assessment.

5.29 During demolition and construction, and once the proposed development is completed and operational, there is the potential for a significant adverse cumulative effect to occur on the future residential at Hurlingham Retail Park in terms of daylight amenity.

### **EIA Summary**

5.30 The proposed development would result in the following significant effects:

- a) During construction: significant adverse effects as a result of the demolition/ construction works with regards to noise, built heritage, townscape, views, daylight and sunlight amenity and solar glare;
- b) Completed and operational: significant adverse effects relating to daylight and sunlight amenity and solar glare. In particular, a major adverse daylight impact was noted for the residential occupiers at 4, 6, 8 and 10 Townmead Road, Spackman House and Dwyer House
- c) significant beneficial effects relating to built heritage, townscape and views

### **Updated ES Statements**

#### ES Revision: July 2022

5.31 In response to on-going engagement, in July 2022, the applicant submitted a revised ES which took account of changes to the submitted scheme. The changes included the following: the tallest building (Block A1) was reduced from 20 storeys to 17 storeys; the main façade brickwork on Blocks A2, A3 and B2 were raised by one storey; Block C materials were altered to match that used atop Blocks A2, A3 and B2 and changes to the associated residential units and mix.

5.32 The changes to the massing, residential units and mix were considered further in relation to the potential for these assessments to affect the relevant chapters in the Nov 2021 ES Volume 1 (Traffic and Transport; Air Quality; Wind Microclimate; Daylight, Sunlight, Overshadowing and Solar Glare; and Built Heritage) and Volume 2 Townscape and Visual Impact Assessment. The proposed amendments did not generate any additional or different likely significant effects to those reported upon within the November 2021 ES.

#### ES Revision: February 2023

5.33 Following continued discussions, further changes were made to the proposed scheme and key amendments since the revised July 2022 update included: Block A1 was moved back from the River Thames by approximately 5m, Block A2 has increased in height by 1 floor, Block B1 was reduced from 15 to 13 storeys, fire tender access was provided to the ground floor of B1 and B2; residential cores were joined to increase fire safety; industrial space reduced by approximately 500m<sup>2</sup> (GEA); café/restaurant reduced by 73m<sup>2</sup> (GEA); residential units has increased from 274 to 285 (+11) and the mix of housing was altered.

5.34 An updated Flood Risk Assessment (FRA) was submitted in support of these proposed amendments, in addition to an updated Navigational Risk Assessment (Annex A). The updated FRA and NRA do not change the effects identified in ES

Volume 1, Chapter 12. The changes to the massing, residential units and mix were further assessed as there is the potential for these to affect the ES assessments of Traffic and Transport, Air Quality, Noise and Vibration, Wind Microclimate, Visual Daylight, Sunlight, Overshadowing and Solar Glare; Built Heritage, Townscape & Impact Assessment and Greenhouse Gas Assessment. The updated report concludes that the proposed amendments do not generate any additional or different likely significant effects to those reported upon within the November 2021 ES.

#### ES Revision: December 2023

- 5.35 Additional changes were proposed as part of on-going changes regarding daylight and sunlight impacts. Notably Block C has been reconfigured: reduced in height by one storey; the remaining residential floors between level 2 to 7 were compressed to minimise floor to ceiling heights; parapet heights have been reduced; windows and balconies have been moved and the mix of residential units has changed.
- 5.36 The changes to the massing, residential units and mix have been assessed further in relation to the ES assessment, as there is the potential for these Chapters to be affected: Traffic and Transport; Air Quality; Noise and Vibration; Wind Microclimate; Daylight, Sunlight, Overshadowing and Solar Glare; Built Heritage; Townscape & Visual Impact Assessment and Greenhouse Gas Assessment.
- 5.37 The reduction in heights of Block C, would improve the daylight and/or sunlight levels to properties at 8, 6, 10, 14, 16 and 18 Townmead Road, Dwyer House and Spackman House. Overall, the proposed changes do not generate any additional or different likely significant effects to those reported in the November 2021 ES.

#### **EIA Conclusion**

- 5.38 The EIA process has demonstrated that, once the proposed development is fully complete and occupied, likely major (significant) adverse effects are limited to localised impacts on daylight. An assessment of environmental topics falling outside of the EIA process is provided in subsequent sections of this report.
- 5.39 Officers are satisfied that the ES complies with the 2017 Regulations and that sufficient information has been provided for the assessment of the environmental impact of the proposal. In terms of the review of the ES, officers accept the conclusions, subject to the imposition of appropriate planning conditions and planning obligations. The planning assessment in this committee report identifies the relevant planning issues and where conditions and obligations are considered necessary to mitigate the effect of the development.

#### **6.0 POLICY CONTEXT**

- 6.1 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.
- 6.2 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).

- 6.3 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 (2023)**

- 6.4 The National Planning Policy Framework - NPPF (as updated 2023) 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.
- 6.5 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. A Written Ministerial Statement (WMS) published on the 24 May 2021 in relation to First Homes has also been taken into consideration.

### **The London Plan**

- 6.6 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 policies set out in the Plan. The London Plan is supported by guidance, which provides further information about how the London Plan should be implemented in the form of Supplementary Planning Guidance ('SPG') documents which have also been considered in determining this application.

### **The Local Plan**

- 6.7 The Council Local Plan was adopted 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. The Council has adopted an Affordable Workspace SPD in October 2022. This SPD provides guidance on the application and implementation of policies relating to affordable workspace. The Council also adopted a Railway Arches SPD in October 2022 which covers topics that frequently need to be addressed when considering proposals and applications for the development of railway arches.
- 6.8 With regard to this application, all planning policies in the National Planning Policy Framework (NPPF), London Plan (2021), Local Plan (2018), and Supplementary Planning Guidance (SPG) / 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 Page 125 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.

## **7.0 PLANNING CONSIDERATIONS**

7.1 The main planning considerations material to the assessment of this application are listed below:

Principle of development –

- Thames Policy Area
- Regeneration/ Opportunity Area – South Fulham Riverside
- Safeguarded Wharf
- Tall Buildings
- Employment
- Commercial Space
- Housing including Affordable Housing
- Accessibility
- Fire Safety
- Crime/Safety and Security
- Residential Amenity: daylight, sunlight, solar glare, overlooking and privacy.
- Urban Design and Heritage: design quality/external appearance and impact on the street scene and character and appearance of the surrounding conservation areas and other heritage assets.
- Transport in terms of traffic generation, delivery/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.

## **8.0 PRINCIPLE OF DEVELOPMENT**

### **Thames Policy Area**

- 8.1 The site lies within the Thames Policy Area (TPA) identified in the Local Plan. London Plan Policy SI14 stresses the strategic importance of the River Thames and its linked waterways and how they provide environmental, economic and health and wellbeing benefits for Londoners and play a key role in place making. London Plan Policy SI15 supports development that facilitates an increase in the amount of freight transported on London's waterways.
- 8.2 Local Plan policy RTC1 recognises the importance of the riverside and encourages development to optimise the potential of sites and improve the environment of the River Thames. The policy states that any waterside developments need to respect the flood defences and enhance these where necessary. It is also important to extend and improve the Thames Path National Trail, together with pedestrian and cycling routes to link it to the surrounding area, which will often depend on the development of the vacant and underused riverside sites. Any development on the riverside needs to respect the unique character of

the river and riverside, having particular regard to the height massing and bulk of the development.

- 8.3 Local Plan Policy RTC3 seeks to secure the quality for all new development and ensure that it respects and enhances the character of the riverside, its natural environment and that it delivers high standard of accessible and inclusive design. The policy encourages the greening and naturalising of the riverbank and flood defences to create habitats for wildlife. Any proposal for this site will need to meet these requirements, and, by their design, contribute to creating an attractive, safe and interesting environment.
- 8.4 The proposed development is set back 10m from the river to safeguard and ensure satisfactory flood defences and would include tree planting with root protection measures. A detailed scheme to replace the river wall / flood defence will investigate and, where feasible, implement, ecological enhancement measures into the river wall. Further consideration will be given into the potential to incorporate new floating reedbed habitats (subject to navigational requirements) and increased mud flat habitat and/or additional planters. The design of the pier structure includes the provision for fish refuge and vertipools (artificial rock pools) which create new wildlife habitats, delivering net gains for biodiversity. The Environment Agency has considered the proposals and subject to appropriate conditions raises no objections to the amended proposals which includes a greater setback than originally proposed.
- 8.5 The proposals include an extension to the Thames Path with 24-hour lift / staircase access for cyclist and pedestrians. In addition, the development secures associated highway improvements at the Wadsworth Bridge junction that will enhance public access to the extended footpath.
- 8.6 In respect of proposals for tall buildings, further policy guidance is provided in policy DC3 'Tall Buildings'. The South Fulham Riverside Regeneration Area policy has additional guidance for this area.
- 8.7 Subject to conditions, the proposals accord with Local Plan policy RTC1 and RTC3 of the Local Plan.

### **Regeneration Area and Opportunity Areas**

- 8.8 Chapter 11, Paragraph 124 (c) of the NPPF states that planning decisions should give substantial weight to the value of using suitable brownfield land in meeting the need for homes and other identified needs. Paragraph 124 (d) promote and support the development of under-utilised land and buildings.
- 8.9 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.
- 8.10 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.”

8.11 The Local Plan Strategic Policy Regeneration Areas Policy directs and supports major regeneration and growth in four main areas including the South Fulham Riverside Area. Strategic Policy SFRRRA provides opportunities for high quality residential and mixed-use development whereby development should:

- be predominantly for residential purposes as this would contribute to meeting the South Fulham Riverside target of 4,000 addition dwellings by 2035.
- include employment-based uses that will meet local business needs, particularly in the vicinity of Imperial Wharf Station and on sites close to the Wandsworth Bridge Road, Townmead Road and Carnwath Road junction.
- include appropriate small-scale retail, restaurants and leisure uses which are likely to be appropriate on the Thames frontage.
- create high quality public realm, especially on the riverside where a very high standard of urban design will be required.
- integrate and connect with the surroundings, particularly with the river.
- implement cycling and pedestrian access to the bridge and therefore connection to the south of the river.
- provide appropriate social, physical, and environmental infrastructure to support the needs arising from development and the area as a whole.
- acceptable in terms of transport accessibility and impact.
- be sensitively integrated with the existing townscape, ensuring no substantially harmful impact on heritage assets, and respect for the scale of the surrounding residential buildings.

8.12 The application site falls within the South Fulham Riverside Regeneration Area which comprises a mix of land uses and includes underutilised and vacant riverfront commercial sites that sit alongside new large residential developments. The area is in fragmented ownership, and access to the riverside is limited, restricted to isolated passages around large plots of land.

8.13 The area has been designated a regeneration area because it is capable of a substantial increase in homes and jobs along the riverfront. The majority of the SFRRRA lies within the Sands End Conservation Area, designated to protect the River Thames and riverside from unsympathetic development. The London Plan seeks to protect safeguarded wharves in London (Hurlingham, Swedish and Comleys in LBHF).

8.14 The supporting text to Strategic Policy SFRRRA (para 5.100) states that it is ‘important that employment space should be located in the most accessible parts of the SFRRRA being Imperial Wharf Station, with a secondary location around the junction at Wandsworth Bridge Road, Townmead Road and Carnwath Road where it is closest to a number of bus routes that run both along Wandsworth Bridge Road and along Townmead Road. With many previous employment sites being redeveloped for housing, it is important that some replacement employment opportunities are provided in new development schemes to create a mixed use area and provide jobs locally.’



8.15 The proposal would deliver a mixed-use development in line with strategic policy SFRRRA, addressing housing needs in the borough as well as contributing to the borough's housing target set out by the London Plan in line with Policy HO1. Given part of the site is a safeguarded wharf, the proposals should comply with Policy SI15, hence being compatible with Wharf uses, capacity and operability.

### Safeguarded Wharves

8.16 The borough has three safeguarded wharves in the SFFRA. The importance of safeguarding wharves is identified in the London Plan under policy SI 15. Swedish Wharf and the adjacent Comleys Wharf were recommended for retention in the GLA's updated Safeguarded Wharves Review (2019). Safeguarding Directions were issued by the Secretary of State in relation to both wharfs on 19 February 2021. The Safeguarding Directions require all applications for permission on a safeguarded wharf be referred to the Mayor.

8.17 The London Plan seeks to safeguard the wharfs for the purposes of water-borne freight handling. London Plan Policy SI15 aims to ensure that sufficient waterborne freight handling capacity is maintained across London in terms of the overall network of safeguarded wharves. It states that development proposals that facilitate an increase in the amount of freight transported on London's waterways should be supported. Swedish Wharf and the adjacent Comley's Wharf are protected by a safeguarding direction and London Plan Policy SI15 for use in connection with cargo-handling.



Image 11: Safeguarded Wharves: Swedish and Comley's Wharves

8.18 The proposed mixed use needs to be assessed against the planning policy criteria set out in Part G of Policy SI15. This states that development proposals on a safeguarded wharf that include the provision of a water freight use below or alongside another land use must ensure that the water freight use is secured in the long-term and that the development is designed so that there are no conflicts of use and that the freight handling capacity of the wharf is not reduced.

### Context

8.19 The adjacent Comley's Wharf is a safeguarded operational wharf which comprises a concrete batching plant. The proposed development would therefore also need to comply with Part H of Policy SI15 which states that development proposals

adjacent to a safeguarded wharf should be designed to minimise the potential for conflicts of use and disturbance, in line with the Agent of Change principle.

### Proposed Use

8.20 Swedish Wharf is no longer in wharf use in terms of handling freight by water and does not currently have an operational river frontage, with the oil fuel which is stored on site being distributed by road. The proposal would re-activate the safeguarded wharf use on the site, which is strongly supported in principle by both the GLA and PLA.

8.21 The principle of a mixed-use scheme comprising residential accommodation above a retained safeguarded wharf has already been established through the previous lapsed planning permission referred to above, albeit the site boundary differed slightly in that it also comprised Comley's Wharf. As with the previous 2015 planning approval, the wharf would be accommodated within a concrete enclosed 'wharf box', with residential blocks and a communal courtyard amenity space at podium level.



Image 12: Footprint of uses (Ground floor)



Image 13: Cross Section Wharf Box with residential above

8.22 The applicants have worked with the PLA to ensure that the safeguarded wharf element of the proposal meets the PLA's operational requirements. The new freight handling wharf will include:

- an enclosed 'wharf box' with mitigation to prevent noise and dust noise break allowing for controlled 24 hour operations/ 7 days per week;
- a proposed jetty (50m long) to facilitate offloading of cargo from marine vessels / barges via cranes.with enhanced cargo handling facilities for river deliveries;
- improved on-site cargo and storage facilities



**Image 14: Reactivated Active Wharf**

8.23 Vehicle access would be via the existing site access on Townmead Road, with a 17-metre frontage maintained on this side of the wharf. The height of the podium would range from 7 to 10-metres in terms of clear head room, with the higher floor to ceiling heights adjacent to the Thames. A mezzanine office is proposed adjacent to Townmead Road.

8.24 The proposal re-provides 5,345 sqm total area for safeguarded wharf. This includes external uncovered areas but doesn't include the marine deck/jetty area. The size of the proposed wharf box would total 4,860 sqm in general industrial / warehouse and distribution and light industrial Class B2/ B8 / E(g)(iii) use. Overall, the proposed re-provision exceeds the existing safeguarded area (5,200 sqm) ensuring no net loss, in accordance with the requirements of London Plan Policy S15 and Safeguarding Direction. There would be some minor reconfiguration of the designated area to enable the wharf to function appropriately, as shown above. This is acceptable.

8.25 The proposed wharf box has been designed to ensure maximum flexibility and long-term viability to enable a range of waterborne freight handling activities, it is understood that the two main options being considered at this stage. This includes a heavy cargo / freight-based option comprising construction, excavation and demolition waste. The alternative option is for a light freight / cargo urban logistics option.

8.26 The wharf would accommodate a maximum freight handling threshold of 350,000 tonnes per year / 1,246 tonnes per day. This would translate to 391 barges per annum or seven to eight barges per week (with between 1 and 2 barges arriving and departing per day).

8.27 The PLA has been involved from an early stage in the design and layout of the re-provided wharf. The PLA is fully supportive of the maximisation of the use of Swedish Wharf for waterborne cargo freight handling up to 24 hours a day in line with its designation and extant planning policy.

### Navigation

- 8.29 The PLA have reviewed the applicant's Safeguarded wharf assessment and the submission of an updated Preliminary Navigational Risk Assessment undertaken by the applicants specialist consultants Nash. The submitted Preliminary NRA is sufficient to be able to make an early assessment of the proposal, subject to the requirement that a full NRA is secured by condition. A detailed Navigational Risk Assessment will be undertaken to determine the associated level of risk and to confirm the relevant risk control measures which would be adopted by the proposed development to ensure that the level of risk is 'As Low as Reasonably Practicable'.
- 8.30 A detailed NRA will fully reflect the final form of marine infrastructure and its operation and to furthermore set any required conditions including on matters such as maneuvering over high water. The scope of the NRA will be agreed with the PLA, as the Statutory Navigation Authority, and include key consultees such as Cemex. The detailed NRA will also include a detailed passage plan and operational plan to show that a full assessment has been made on the impact of navigational safety in the area. The PLA consider that the matter of potential overlapping barges at Comley's Wharf will also be considered in the detailed NRA and this would be secured by condition in line with PLA requirements for the construction and operation of the proposed jetty.
- 8.31 The re-activation of the existing safeguarded wharf as part of a high density, residential-led mixed use development would accord with London Plan Policy SI15, SFRRRA Strategic Policy. However, this is subject to the delivery of the wharf related element of the proposal being secured, including the freight handling capacity and the agreed Agent of Change mitigation measures, with any road safety issues addressed.
- 8.32 Subject to appropriate conditions, officers are satisfied that the proposed development is compatible with policy SI15 of the London Plan and Local Plan policies RTC1, RTC3 and RTC4.

### **Employment Use**

- 8.33 London Plan Policy E1 relates to offices. The policy supports new office provision of different sizes, including lower cost and affordable workspace, particularly in town centres. Policy E2 supports the provision of suitable business space, with a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises. Policy E3 relates to affordable workspace. The policy states that planning obligations may be used to secure affordable workspace.
- 8.34 Local Plan Policy E1 sets out the borough's aspirations for mixed use and new employment schemes, and the retention, enhancement and intensification of existing employment uses. The policy states that these industries will require flexible and affordable space suitable for small- and medium-sized enterprises in large new business developments.

8.35 One of the objectives of the strategic policy SFRRRA is to deliver 500 new jobs by 2035 (see Table below on Regeneration Areas targets - p.41 of the Local Plan), providing a range of skills and competencies.

Regeneration Area	Indicative new homes	Indicative new jobs
White City Regeneration Area (WCRA)	6,000	10,000
Hammersmith Regeneration Area (HRA)	2,800	10,000
Fulham Regeneration Area (FRA)	7,000	9,000
South Fulham Riverside Regeneration Area (SFRRRA)	4,000	500
<b>Total</b>	<b>19,800</b>	<b>29,500</b>

Table 2: LBHF Regeneration Areas: Indicative target homes and jobs

8.36 According to London Plan Policy E2, on underutilized sites where a loss of employment is proposed, a mixed-use enhancement of employment sites will be considered acceptable, subject to the satisfactory retention or replacement of employment uses in the scheme where this continues to be appropriate. The scheme would create new employment opportunities by providing B2/B8 and E class uses which would contribute to achieving the target set out for this regeneration area. The re-provision of a wharf on this underused site in collaboration with the PLA represents a significant contribution to the re-instatement of local employment floorspace. This modernized floorspace with its associated jetty would be the reactivation of the wharf in line with the London Plan Policy E2 and Local Plan Policy E1 and SFRRRA Strategic Policy.

### Tall Buildings

8.37 London Plan Policy D9 supports high density development and requires LPAs to identify appropriate locations for tall buildings and the height of tall building will vary but should not be less than 6 storeys or 18 metres as measured from ground to the floor level of the uppermost storey. Local Plan Policy DC3 states that tall buildings may be appropriate in the South Fulham Riverside Area. The Local Plan defines tall buildings as those which are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor.

8.38 The South Fulham Riverside SPD (2013) is more than 10 years old and predates both the London Plan (2021) and Local Plan (2018). The SPD provides supplementary planning guidance on the height and massing of development in the area. The SPD states that heights up to 7-storeys would be generally appropriate East of Wandsworth Bridge Road, with some higher buildings to provide variation in height and mark key locations. Building heights can be increased towards the river frontage to give definition and presence to the riverside. 10-storeys is mentioned in the SPD as a threshold which should not be exceeded but this applies west of Wandsworth Bridge Road.

8.39 In terms of compliance with Policy D9, officers consider that the site is located within a broadly defined area where tall buildings can be supported. As such, officers consider that the application would accord with the locational and plan-led requirement set out in Part B of Policy D9. Notwithstanding this, an assessment of



the scheme against the qualitative criteria set out in Part C of London Plan Policy D9 is still required.

### **Housing Supply**

- 8.40 Paragraph 60 of the NPPF sets out that sufficient amount and variety of land can come forward where it is needed to boost the supply of housing including an appropriate mix of housing types for the local community. Paragraph 66 of the NPPF actively encourages the delivery of affordable housing on major sites.
- 8.41 London Plan Policy SD1 supports the growth potential of Opportunity Areas. Table 2 above gives an indicative capacity of 4,000 new homes in the SFFRA.
- 8.42 London Plan Policy H1 (Increasing housing supply) sets ten-year targets for net housing completions that each local planning authority should plan for. To ensure that ten-year housing targets are achieved, boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, especially those within PTALs 3 to 6 or within 800 metres of a station or town centre. Table 4.1 of the London Plan specifies a minimum ten-year housing target of 16,090 homes, which is equivalent to 1,609 homes per annum for Hammersmith and Fulham.
- 8.43 Local Plan Policy HO1 (Housing Supply) supports the delivery of new housing but is predicated on the housing target derived from the previous version of the London Plan. Table 1 of the Local Plan supporting the policy sets out indicative housing targets for the South Fulham Riverside Regeneration Area which this development site sits in SFFRA which has a target of 4,000 new homes. The housing target outlined in Policy HO1 are superseded by the more up to date requirements of Policy H1 of the London Plan.
- 8.44 The proposal includes 276 net additional residential units and would therefore make an important contribution towards meeting the local and strategic minimum housing targets of 1609 homes per annum for Hammersmith and Fulham. The proposals would accord with policies H1 of the London Plan and SFFRA and HO1 of the Local Plan.

### **Affordable Housing and Housing Mix**

- 8.45 London Plan Policy H4 (Delivering affordable housing) sets a strategic target of 50% of all new homes delivered across London to be genuinely affordable. Policy HO3 of the Local Plan states that affordable housing will be sought on all developments capable of providing 11 or more self-contained dwellings and will be negotiated based on a borough wide target of 50% provision. The proposal would comprise 276 dwellings and trigger the threshold.
- 8.46 Policy H5 of the London Plan states the threshold level of affordable housing is a minimum of 35%. Part E states that schemes can follow the fast-track viability route and are not required to submit viability information nor be subject to a late stage viability review if they meet or exceed the relevant threshold level of affordable housing on site without public subsidy; are consistent with the relevant tenure split; meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant; and demonstrate that they have taken account of the strategic 50% target and have sought grant to increase the level of affordable housing.

- 8.47 The policy states that to ensure an applicant fully intends to build out the permission, a requirement for an Early-Stage Viability Review be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough).
- 8.48 Policy HO3 of the Local Plan (2018) states that housing development should increase the supply and improve the mix of affordable housing to help achieve more sustainable communities in the borough. The borough target for development capable of more than 11 units is 50%, which is in line with the London Plan strategic target. The policy requires that affordable housing should be provided in line with the following: a. a borough wide target that at least 50% of all dwellings built should be affordable; b. 60% of additional affordable housing should be for social or affordable renting, especially for families and 40% should be a range of intermediate housing; c. affordable dwellings should be located throughout a new development and not concentrated on one part of the site; d. the provision of affordable rented and social rented housing in ways that enable tenants to move into home ownership.
- 8.49 In respect of the London Plan, industrial sites (including the wharf area) are normally subject to the 50% affordable housing threshold. A lower 35% threshold is only applicable where the scheme would meet the requirement to ensure no net loss of industrial capacity. This is calculated on the basis of either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65% plot ratio (the ratio of total development floor area to site area), whichever is the greater in line with the London Plan. In this case, there is no existing industrial floorspace on site, so the 65% plot ratio would be used to assess industrial re-provision.
- 8.50 The applicant has provided information in relation to the site areas and industrial / wharf re-provision;. The 65% plot ratio target for this site is 4,790 sqm. The applicants submitted accommodation schedule prepared confirms that the proposed industrial floorspace is 4,860 sqm GEA which exceeds the minimum target and this has been confirmed in writing by the GLA.
- 8.51 The scheme would therefore be subject to the 35% affordable housing threshold in accordance with the London Plan.
- 8.52 The applicant submitted a Financial Viability Assessment (FVA) to the Council as the proposed tenure split does not accord with the requirements set out in Hammersmith and Fulham Local Plan Policy HO3. However, because the scheme accords with the required London Plan affordable housing threshold (35%) and generally accords with the minimum tenure split requirements set out in London Plan Policy H6, the scheme accords with the GLA Fast Track Route criteria.
- 8.53 The applicants have worked with officers and the Council's independently appointed viability consultant BPS through various pre-application and application versions of the scheme. During the pre-application stage, the scheme proposals varied between 298 and 324 residential units. The original planning application submission comprised 281 residential units with 35% affordable housing by habitable room, of which some 51% was intermediate housing and 49% was social rent.

8.54 In response to the planning constraints identified regarding requirements for a set back from the river, fire safety access, height/ massing and impact on daylight and sunlight along Townmead Road, the proposed design includes a revised footprint with a reduced massing comprising 276 units, (35% affordable housing by floorspace) with an affordable tenure split of 47% Social Rent to 53% Intermediate (by habitable room). The social rent homes would be provided in Block C and intermediate housing in Blocks A3 and B2. The intermediate tenure would be flexible between shared ownership and London Living Rents in line with affordability caps to be secured by s106.

8.55 The proposed tenure mix has been reviewed by LBHF housing officers and they are satisfied with the proposed overall tenure split subject to early and late-stage review mechanisms within the s106. The review mechanisms will enable officers to compare the viability assessment at application stage with actual achieved values and costs. If the original assessment was too pessimistic then a late payment to the Council will be required, or additional dwellings will be required to be delivered as affordable housing. In addition, the s106 will include a review of the proposed tenure mix to ensure that this best meets the Council's housing needs prior to commencement of development.

8.56 The proposed 81 affordable residential units would contribute to delivery of much needed housing in the borough and London as a whole in line with London Plan H4 and H5 Policy HO3 of the Local Plan.

#### Mix

8.57 Policy H10 of the London Plan (Housing Size Mix) states that schemes should consist of a range of unit sizes. The proposed mix of units (see Table 3 below) has remained virtually the same since the original submission and is considered acceptable.

8.58 Policy HO5 of the Local Plan relates to housing mix. Sets out that the council will work with registered providers and other house builders to increase the supply and choice of high-quality residential accommodation that meets local resident's needs and aspirations and demand for housing. The policy sets out aims which should be considered on a site-by-site basis:

a) for affordable rented housing approximately:

- 1 bedroom: 10% of units;
- 2 bedrooms: 40% of units;
- 3 bedrooms: 35% of units;
- 4 bedrooms 15% of units;

b) for intermediate housing approximately:

- 1 bedroom: 50%;
- 2 bedrooms: 35%;
- 3 or more bedrooms: 15% of units.

8.68 The affordable housing mix would comprise of 26 social rent units with 4% 1-bed, 4% 2-bed, 73% 3- beds and 19% 4-beds in the development. The 55 intermediate units would include 49% 1-beds, 40% 2-beds and 11 % 3-beds or more.



8.69 Overall, 30 (52%) of the 58 proposed family units (3-bed and above) would be affordable units housing. Notably, 26 (80%) of the affordable family units would be for social rent.

8.70 The site is in the SFRRRA and has a PTAL rating of predominately 3 and 4. The mix is considered to respond to the accessible nature of the site whilst including a proportion of much need larger units, including 3 and 4-bedroom units which could support family accommodation. The mix and tenure of the proposed affordable housing are below:

Tenure	Studio	1B2P	2B3P	2B4P	3B4P	3B5P	4B6P	Total
Market	10	88	1	68	0	28	0	195
Intermediate	0	27	1	21	6	0	0	55
Social Rent	0	1	1	0	19	0	5	26
Total	10	116	3	89	25	28	5	276

**Table 3: Proposed housing mix by tenure (this mix is subject to further review in the s106)**

Affordability

8.71 The social rent units would be provided at guideline target social rent levels, which would be secured via the S106 agreement. In terms of the intermediate element, the applicant is seeking a degree of flexibility to provide either London Living Rent or shared ownership; or a combination of the two, so long as the shared ownership homes meet the following affordability criteria, which the applicant has been agreed with LBHF Housing officer.

- 1-bedroom units – up to a maximum of £50,000
- 2-bedroom units: at least 50% to £60,000/ no more than 50% to £80,000.
- 3-bedroom units: at least 50% to £70,000/ no more than 50% to £90,000

8.72 The affordability of shared ownership total monthly housing costs shall not exceed 40% of net household income, where net household income shall not exceed 70% of gross household income. This is supported in principle and would be generally accord with London Plan Policy H6, subject to these minimum requirements being secured via the S106 agreement.

8.73 For rental properties, housing costs means rent and service charge. London Living Rent (LLR) would be secured by reference to the GLA’s ward level London Living Rents. Eligibility for the LLR units would be for households on incomes up to a maximum of £60,000.

8.74 Discussions with LBHF Housing Officers have taken place to ensure the affordable housing is affordable with a mix of rented and intermediate homes is secured. Officers are satisfied that the provision of affordable housing in this case has been met and provides a suitable tenure split to meet local need. The affordable rent levels and intermediate tenures would be secured by the Section 106 Agreement to ensure they remain at genuinely affordable levels. Subject to this and meeting other housing policy/standard requirements, the proposals are supported in

accordance with London Plan Policies H4, H5, and H6 of the London Plan and Local Plan Policies HO1 and HO3.

## **Housing Standards**

- 8.75 In terms of residential minimum space standards set out at London Plan Policy D6 and Local Plan Policy HO4, the proposals are of high quality and provide adequately sized rooms. Table 1.3 of policy D6 of the London Plan (2021) sets out space standards for different residential units. Policy D6 of the London Plan also requires that the number of dual aspect units should be maximised. For the units proposed as part of this scheme the standards would be as follows:
- 1b/1p - minimum 39 sqm (bath) or 37 sqm (shower) GIA (proposed: 42 sqm GIA)
  - 1b/2p – minimum 50 sqm GIA (proposed range 52 sqm to 78 sqm GIA)
  - 2b/3p – minimum 61 sqm GIA (proposed range: 61 sqm to 91 sqm GIA)
  - 2b/4p – minimum 70 sqm GIA (proposed range: 70 sqm to 103 sqm GIA)
  - 3b/4p - minimum 74 sqm GIA (proposed range: xx sqm to xx sqm GIA)
  - 3b/5p - minimum 86 sqm GIA (proposed range: 86 sqm to 116 sqm GIA)
  - 4b/6p – minimum 99 sqm GIA (proposed range: 99 sqm to 116 sqm GIA)
- 8.76 The residential accommodation is well designed internally and externally with a good mix of unit sizes. All the units would comply with the standards for their given size. As a result, the units would be of a sufficient size to provide a suitable internal living arrangement. All the new homes of the Proposed Development will contain adequately sized rooms and convenient and efficient room layouts in compliance with London Plan Policy D6 and Local Plan Policy HO4.
- 8.77 In terms of outlook, north facing windows have been avoided wherever possible. Overall, the scheme proposes 54% dual and triple aspect units. Single aspect units predominantly face east and west. There are no north facing single aspect units. The provision of dual aspect homes has been incorporated within the layout and development constraints by projecting and recessing the elevations of the blocks to create small corners and the potential for additional aspects and outlooks. The majority of units adjacent to the Comley's Wharf (on Block B) and above the entrance to the proposed wharf box on Townmead Road (Block C) are dual aspect.
- 8.78 The applicant explored the introduction of more breaks between the blocks to ensure increased sunlight into the courtyard and increased provision of dual aspect homes. However, this is not desirable due to the noise constraints associated with Wandsworth Bridge Road and Comley's Wharf. Based on the potential noise levels identified and proposed mitigating arrangement of the blocks which helps to buffer and reduce noise within the courtyard, the proposed arrangement is considered satisfactory.
- 8.79 Winter gardens are proposed for the units in Blocks B1 and B2 which are adjacent to Comley's Wharf. The visualisations provided demonstrate these private amenity spaces would be of a good standard, providing attractive and usable internal spaces which are well-integrated to the dwellings. Increased floor to ceiling heights are proposed for all units on the first four floors to improve daylight levels and the overall residential quality. All of the other homes would have 2.5 metre floor to ceiling heights.

- 8.80 A set back area of 'green buffer' landscaping is proposed at podium level adjacent to the eastern boundary with Comley's Wharf to mitigate potential environmental and residential quality issues for the lowest residential units on the scheme. This would comprise hedge planting and dense tree and understory planting along a 4-metre wide section running along the length of Blocks B1 and B2.
- 8.81 The unit per core per floor ratio is acceptable and is in line with the Housing SPG benchmark, with the proposed cores serving a maximum of 8 homes on each floor. Natural daylight into the longer internal communal corridors has been incorporated into the proposals where possible.
- 8.82 A daylight and sunlight assessment has been submitted with the application which includes an assessment of the daylight levels provided to the new residential units. This was carried out using the 2022 revision of the BRE guidelines. Overall daylight amenity within the scheme will be good, and the level of compliance with BRE targets is good, particularly considering the urban context. Therefore, it is considered that the proposal would provide a suitable standard of amenity for future occupiers.
- 8.83 Policy D6 of the London Plan specifies a minimum floor to ceiling height of 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling. The flats have been designed to have ceiling heights of 2.5m. Therefore, all the units would comply with the London Plan requirements on floor to ceiling heights which indicates a good standard of accommodation.
- 8.84 Overall, the residential quality of the scheme is considered to be of an acceptable standard and complies with London Plan Policy D6

#### Accessible Housing

- 8.85 In accordance with London Plan Policy D7 and Local Plan Policy HO6, 10% of the units would be built to M4(3) wheelchair accessible standard (10%) whilst the remainder would all be M4(2). The entrance to the communal areas and external areas are designed with accessibility in mind and lifts have been provided which meets the requirements of Part M of the Building Regulations. The proposal is considered acceptable in this regard and would provide suitable accessibility for all potential occupiers in accordance with London Plan Policy D7 and Local Plan Policy HO6.

#### **Café/Restaurant Use**

- 8.86 Strategic Policy SFRRRA of the Local Plan states that proposals for development within the SFRRRA should include appropriate small-scale retail, cafes and leisure uses to support day to day needs.
- 8.87 The proposed development includes the provision of a 76 sqm GEA café/restaurant (use class E(b)) at upper courtyard level adjacent to the proposed Thames Path extension and a new riverside 'pocket' park.
- 8.88 The proposed scale and nature of the café/restaurant use accords with Strategic Policy SFRRRA of the Local Plan as the use would be adjacent to the Thames riverside and a new Thames Path extension.

### **Private Open Space**

- 8.89 Policy S4 of the London Plan (Play and Informal Recreation) states that development proposals should incorporate high quality, accessible play provision for all ages, of at least 10 sqm per child based on the GLA calculator. Local Plan Policy HO4 sets out that 'ground level family housing should have access to private gardens/amenity space. Family housing on upper floors should have access to shared amenity space, children's play space, and/or a balcony or terrace subject to acceptable amenity and design considerations.'
- 8.90 Local Plan Policy HO11 and SPD Key Principle HS1 require all new developments to make provision for open space to meet the needs of occupiers and users. It is also required that all new dwellings have access to an area of amenity space appropriate to the type of housing being provided. The Mayor's Housing SPG Standards 26 and 27 require a minimum of 5sqm. of private outdoor space to be provided for 1-2 person dwellings and an extra 1sqm. for each additional occupant, and where balconies are provided, these be designed to respect the amenity of neighbours and should have a minimum depth of and width of 1500mm. The latter is also reiterated under Planning Guidance SPD Key Principle HS1. This key principle also states that every new family (3 or more bedrooms) dwelling should have access to amenity or garden space, and for family dwellings on upper floors this space may be provided either as a balcony or terrace and/or communally within the building's curtilage.
- 8.91 In terms of communal space Key Principle HS1 states that this should: - have a well-designed area for children's play adequate to meet the needs of the development; - be overlooked by surrounding development; - be accessible to wheelchair users and other disabled people; - be designed to take advantage of direct sunlight; - have suitable long term management arrangements in place to ensure open space is well managed over the life of the development.
- 8.92 All of the new homes will be provided with private amenity space (in line with Policy D6), largely in the form of a balconies or terraces, albeit in some cases through winter gardens. In total, over 2,500 sqm (or an average of 9sqm per home) of private amenity space is provided.
- 8.93 All residents will have access to a mix of shared external amenity spaces, principally through two large courtyard podiums (upper and lower), as well as series of communal roof terraces on a number of buildings which occur at varying levels.
- 8.94 Amenity space would be provided through small garden areas at ground floor level and balconies to the upper floor units along with communal amenity space and play space. Private open space, communal outdoor amenity space and play space are provided. Each residential unit is assigned 10m<sup>2</sup> of external amenity space. The proposed balconies have been designed in accordance with SPD policy HS1. Where this is not provided as part of the private open space in the form of a balcony or terrace, the residual amount will be provided within the shared private communal amenity space. In total 175 sqm of external community amenity space is provided at Podium Level. A further 495 sqm is provided at ground floor level.
- 8.95 In addition, all residents will also have access to shared internal residential

amenity space located around the lower courtyard. These spaces, which extend to 766 sqm could accommodate a range of ancillary uses, including communal work, lounge areas or gym spaces.

8.96 As a result, in this instance it is considered that the level of external amenity space provision is acceptable and would provide a suitable residential environment for future occupiers.

### **Children's Play Space**

8.97 Policy S4 (Play and Informal Recreation) of the London Plan states that development proposals for schemes that are likely to be used by children and young adults should increase opportunities for play and informal recreation and enable children and young people to be independently mobile. The Policy further states that for residential development proposals should incorporate good-quality accessible play provision for all ages. At least 10 square metres of play space should be provided per child that provides a stimulating environment, is accessible to all safely from the street and forms an integral part of the surrounding neighbourhood. These spaces should also incorporate trees, be overlooked to enable passive surveillance and not be segregated by tenure.

9.98 Play space provision should be made available to all housing tenures to promote social inclusion. Play space should normally be provided on-site however, off-site provision may be acceptable in circumstances where it can be demonstrated that this would address the needs of the development and is within an accessible and safe walking distance. Off-site provision will be acceptable and is secured by a Section 106 obligation.

8.99 The applicant has assessed the play space requirements for the scheme, using the GLA calculator. This yields an overall on-site requirement for 923 sq.m. of play space provision. The applicant's draft play space strategy proposes 713 sq.m. of on-site play space at podium and roof top level. The majority of play 'doorstep' and 'local' space requirements for children aged 0-4 years and 5 to 11 years would be met on site, with a shortfall in on site provision and requirement for some off-site play space provision. All of the youth play space for children aged 12 and over would be met off-site. In view of the site constraints, this is acceptable in this particular instance.

8.100 The majority of play space proposed within the scheme would be located within the internal courtyard, including a large public lawn area with incidental play which would be to the far south of the courtyard and next to the Thames Path and cafe at the base Block A1. These elements would be accessible to all tenures. Further roof top level play space is proposed which would be incorporated with the residential roof top communal space and landscaping and available to residents within those blocks.

8.101 The applicant has agreed to make a £47,250 financial contribution to mitigate on site shortfall for older children, discussed with Parks, likely to be allocated to South Park). Subject to off-site play space for children aged 12+ being secured by way of a financial contribution secured in the S106 under Public Realm and Environmental Improvements. The play space proposals are supported in accordance with London Plan Policy S4 and Policy HO4.

## **Public Space**

- 8.102 London Plan Policy SI 16 (part g) which states that development proposals should improve and expand the Thames Path and the towpaths, improve alignment with the waterway where relevant, enhance them as walking routes, and provide better linkages to the transport network. In accordance with this, Local Plan Policy RTC2 seeks accessible and inclusive public access to the riverside, including through-Site links when riparian development takes place and the provision and enhancement of the Thames Path National Trail (the riverside walk).
- 8.103 The application site is subject to a Thames Path designation. The proposed development includes the extension to the Thames Path/riverside walk, extending over the 'wharf box', with stairs and lift access from Wandsworth Bridge Road, to create an active waterfront comprising a new café/restaurant unit and an adjacent 'pocket' park. The potential continuation of the Thames Path towards Fulham Wharf should Comley's Wharf be redeveloped would be future proofed.
- 8.104 The proposed extension to the Thames Path is complies with London Plan Policy SI 16 and Local Plan Policy RTC2.

## **Land Use Conclusion**

- 8.105 The mix of uses proposed will help to reactivate the safeguarded wharf along the riverside and regenerate the wider SFRRRA. The Proposed Development would contribute towards the priorities identified in LBHF's Industrial Strategy and generate a wide range of economic benefits including the re-instigation of a safeguarded wharf together with the delivery of affordable housing and an extension to the river path as sought by Local Plan Policies SFRRRA Strategic Policy, RTC1 and RTC3 and London Plan policies GG1 (Building strong and inclusive communities) GG2 (Making the best use of land) and SD1 (Opportunity Areas).
- 8.106 Officers consider the proposal in land use terms is considered appropriate within this 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 and SD1 and Local Plan Policies SFRRRA. 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**

- 8.107 London Plan Policy GG1 seeks inclusivity in new buildings and spaces to enhance the identity, legibility, permeability and inclusivity of neighbourhoods. 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. Policy D7 of the London Plan requires suitable housing. Residential development should ensure that at least 10 per cent of dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. All other dwellings should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

8.108 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.

8.109 London Plan Policy D7 (Accessible housing) and Local Plan Policy HO6 (Accessible housing) both 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'.

8.110 The application complies with the accessible housing standards in the London Plan Policy D7, with a good range of wheelchair accessible unit sizes proposed across the housing tenures and types; this would be secured by condition. The proposed design has inclusive access arrangements in terms of communal core entrances, access onto the Thames Path and through the upper and lower podium level courtyards. The Thames Path would be served by a lift as well as stairs at an acceptable incline. The proposed approach is acceptable and complies with London Plan Policy D5.

8.111 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**

8.112 Policy D12 in the London Plan requires major applications to be accompanied by a detailed draft Fire Safety Statement, prepared by a suitably qualified third-party assessor, to demonstrate demonstrating how the development proposals would achieve the highest standards of fire safety. Policy D12 of the London Plan states that the provision of stair cores which are designed with appropriate features to allow simultaneous evacuation should be explored wherever possible.

8.113 London Plan Policy D5 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.

8.114 A fire statement has been prepared by a specialist consultant and submitted as part of the planning application, as required by London Plan Policy D12. This sets out the applicant's fire safety approach in terms of building construction, means of escape, passive and active fire safety systems (including sprinkler systems), access and facilities for firefighting services. The fire strategy has been amended to accord with the HSE's fire requirements for proposals involving tall buildings. The HSE has worked with the applicant to ensure fire safety compliance and raise no objections to the latest proposals. Subject to the agreed details being secured by condition the proposals accord with London Plan Policies D5 and D12.

### **Crime, Safety and Security**

8.115 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.

8.116 Along with the Design and Access Statement (DAS), a Crime Impact Statement was submitted with the application. The development has been designed to minimise the security risk within the development and the immediate surrounding area. During the construction period, a level of physical and procedural practices would be agreed with the contractor to include robust perimeter delineation of the site.

8.117 Once completed and operational, the development would have a security, safety and access control roles. A comprehensive CCTV system would provide extensive coverage and act as a visual deterrent. The on-site team would be able to monitor CCTV views at any time and CCTV would be connected to Council's system. Vehicle and pedestrian routes are intended to have security gates installed. Residents and occupants would be given fob or key access.

8.118 A lighting strategy would add to enhancing a safer environment. Lighting would be designed into the entrances, routes and spaces, whilst assisting users as part of a site way-finding strategy. It is recommended that CCTV at the entrances and appropriate lighting be provided throughout the development to improve public safety.

8.119 The Crime Prevention Officer has been consulted and raises no objections with the scheme at this design stage. Generally satisfied the development would be able to achieve a 'Secured by Design' (SBD) accreditation once complete, subject to design recommendations being provided. Officers are satisfied that the overarching SBD principles have been established and reflected in the current proposals which would be carried into subsequent design stages. To ensure the overall security strategy and design intent, 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.



## 9.0 RESIDENTIAL AMENITY CONSIDERATIONS

9.1 One of the key objections received from residents relates to the impact of the proposed development on the amenity of the surrounding residential occupiers. Matters relating to agent of change principle, daylight/sunlight and overshadowing plus loss of outlook and overlooking and privacy are covered in this section of the report.

### Agent of change principles

- 9.2 The NPPF makes clear that the occupants of any new development should not be introduced into an environment whereby they are likely to be adversely impacted (significantly) by existing land uses. Notably, new development should be integrated effectively with existing businesses and should not have unreasonable restrictions placed on them as a result of development permitted after they were established.
- 9.3 London Plan Policy D13 (Agent of Change) places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Part D requires that development proposals should manage noise and other potential nuisances by ensuring good design and exploring mitigation measures. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them. This means that where new developments are proposed close to existing noise-generating uses, the scheme should be designed in a more sensitive way to protect the new occupiers, such as residents complaining about noise and other nuisances from existing businesses or activities.
- 9.4 The existing site comprises primarily of industrial buildings, machinery and hardstanding. The lawful use of the site is as a car auction site, a fuel storage and transfer depot. More recently, Albert Wharf on the western part of the site (closest to Wandsworth Bridge) has included a temporary meanwhile use as a bar. Swedish Wharf is a Safeguarded Wharf that is protected from for appropriate uses and is not currently in operation as a wharf but is currently being used as an oil storage depot. The site is in close proximity to existing commercial uses including:-
- CEMEX Concrete Plant (immediately to the east at Comley's Wharf);
  - Porcelanosa (immediately to the north-west of the site) and
  - Sainsbury's Fulham (to the north-east of the site).
- 9.5 The applicants' consultants have prepared and submitted an 'Agent of Change' report to support various relevant chapters in the ES. The report identifies assesses the impacts that future occupiers may be exposed to as a result of the existing land uses. The assessment includes, where relevant, recommendations for additional assessment and any mitigation measures. The following have been included in the assessment: noise; vibration; dust; odour and lighting.
- 9.6 The proposed development has been designed to be sensitive to the industrial uses proposed on the site as well as those undertaken on the adjacent CEMEX concrete plant to the east. The Agent of Change report outlines the range of

considerations and mitigation measures incorporated in relation to noise, vibration, light, dust and odour. This notes that the CEMEX facility has an existing planning permission for improvement to their operations. This permission is extant but has not been fully implemented. However, due to the conditions associated with this permission in relation to dust and pollution management, the current operation is considered to represent the 'worst-case scenario' in terms of the potential for environmental impact.

#### Dust/ Air Quality

- 9.7 A detailed air quality impact assessment has been submitted to determine whether the use of the Safeguarded Wharves (including Swedish Wharf and Comley's Wharf) could impact on the Proposed Development in terms of air quality and dust emissions.
- 9.8 The residential dwellings would be situated above an industrial wharf 'box' that would be completely contained and mechanically ventilated. The containment of the Safeguarded Wharf will dust emissions associated with the activities even in the worst-case scenario.
- 9.9 In terms of air quality, emissions from the operational on-site industrial wharf are associated with road vehicle and river traffic movements delivering to and exporting from the wharf. The submitted ES Volume 1, Chapter 7: Air Quality (paragraph 7.31) sets out traffic data for two scenarios representing potential options for the Safeguarded Wharf. The option involving river to road transfer of aggregates, with aggregate exported from the Safeguarded Wharf using Heavy Goods Vehicles was used to model the air quality assessment as it represents a worst-case scenario. In addition, the concrete and cement batching activities at the adjacent CEMEX Comley's Wharf site were incorporated into the design to ensure future users are not exposed to poor air quality.
- 9.10 Overall, the report concludes that subject to conditions the proposed development has been designed to be sensitive to the industrial uses on and adjacent to the site and is designed to mitigate potential air quality and dust impacts by containing the industrial wharf activities on-site and setting residential dwellings at a height well above the adjacent CEMEX facility, with associated mitigation as discussed above. The air quality assessment demonstrates that the surrounding businesses and on-site industrial wharf activities will not adversely affect the proposed development with respect to air quality and dust, and as such the Proposed Development will not have any implications upon current and future operations of surrounding businesses.

#### Noise

- 9.11 Potential for noise, vibration, dust, odour and lighting impacts associated with the replacement safeguarded wharf operations on site would be mitigated by incorporating this activity within the enclosed concrete wharf box, with residential homes above and the blocks laid out to surround and shelter the two internal communal courtyard spaces.
- 9.12 The applicant's noise assessment revealed that the existing dominant noise sources consists of road traffic and building services plant. Wandsworth Bridge Road is to the west, Townmead Road to the north and Comley's Wharf to the east

of the site; notably the building services noise was attributed to the refrigeration plant associated with the nearby supermarket, to the west of the site, and the operations from Comley's Wharf were undistinguishable from other environmental noise sources. The potential for adverse noise impacts within the habitable rooms of the proposed development is minimised when the internal noise level guidance values are complied with. The noise mitigation measures outlined in the applicants Noise and Vibration report include the implementation of appropriate glazing specifications.

#### Vibration

- 9.13 The applicant's vibration study indicates imperceptible existing levels of vibration and very low levels of potential re-radiated noise. Furthermore, the potential future operations of Comley's Wharf and the industrial wharf proposed as part of the Proposed Development do not include activities that are typically associated with generating significant levels of vibration. Based on these existing low levels of potential vibration / re-radiated noise, the vibration report concludes that it is unlikely that the completion and operation of the proposed development will adversely affect the operation of the existing uses which contribute to these vibration levels.

#### Light Pollution

- 9.14 The Proposed Development has been designed to minimise residential units facing towards Comley's Wharf. Over 40 units have at least one of their windows overlooking Comley's Wharf, however these units are generally dual aspect and are at second floor (on top of the wharf box some 9.5m above ground) and are set back by over 10m from the site boundary. Consequently, any activities at Comley's Wharf which require outdoor artificial floodlighting, are likely to be directed downward and will not reach these residential facades.
- 9.15 The proposed wharf within the site will be designed to respect the proposed residential units. The office building within the CEMEX site has large north-west and south-east facing windows as such and any light spill from that office use are unlikely to reach the residential windows. Larger apertures of living rooms within the proposed development are fitted with fins which help mitigate any lighting from the office and/or operational wharf at the adjoining CEMEX site.
- 9.16 Regarding Porcelanosa, none of the glazed element's face towards the proposed residential units and so would not affect them in terms of light spillage. The north-western and south-western edges of the site are bound by Townmead Road and Wandsworth Bridge Road respectively. Directional streetlighting is located along both roads, and therefore is not likely to flood any light upwards to residents of the proposed Development. Given the residential nature of the east facing elevation of the neighbouring Hurlingham Retail Park redevelopment (Ref. 2013/02870/FUL and 2018/02354/VAR), and the relative distance from the proposed units facing towards Hurlingham Retail Park, it would not result in any light spill effects.
- 9.17 In conclusion, existing sources of artificial lighting surrounding the site are unlikely to adversely impact the new proposed residential units within the Proposed Development by excessive streetlighting or floodlighting. Therefore, the risk of artificial light nuisance to future occupants is considered to be negligible, and as such it is not considered that the Proposed Development will affect the operation of existing uses surrounding the site, and at the industrial wharf on-site, in relation

to lighting.

### CEMEX

9.18 In respect of the adjacent CEMEX facility, the following key mitigation measures are proposed at the application site:

- raising the height of residential uses approximately 15 to 20 metres above the level of the CEMEX concrete plant
- the provision of enclosed private space in the form of winter gardens are proposed for all of the homes along the eastern boundary of the proposed development;
- a green buffer consisting of dense landscape vegetation along the eastern boundary to act as a buffer between the CEMEX site and the lowest residential homes on the Block B next to the adjacent wharf;
- amenity spaces provided within a courtyard within the centre of the proposed development away from other sources of emissions including the CEMEX site;
- majority of units adjacent to the Comley's Wharf (on Block B) and above the entrance to the proposed wharf box on Townmead Road (Block C) are dual aspect.
- Mechanical ventilation is provided throughout the proposed development to ensure that windows can be closed when required to allow residents to control the noise levels, whilst avoiding the risk of overheating during summer months.

9.19 In line with the Agent of Change principle, prospective future residents are required to be made aware of the existing and potential safeguarded wharf operations at both the reactivated Swedish wharf and the operational Comley's wharf, the likely surrounding current and future noise level and the mitigation measures that have been put in place as part of the development to protect amenity. In this policy context, it should also be made clear that for prospective occupiers / owners within the development, any potential noise complaint at or below an agreed noise level (which should be agreed in consultation with relevant stakeholders) would not be acceptable, given the established and potential future noise generating uses located on and adjacent to this development.

9.20 The submitted agent of change report concludes that with regards to air quality, dust, noise, vibration and lighting, this Agent of Change Assessment has demonstrated that through a careful and iterative design process, whereby relevant mitigation has been built into the proposed development following design testing. The development would ensure that future occupants and users will not experience significant adverse environmental effects as a result of existing and permitted activities associated with surrounding businesses and land uses, including the industrial wharf provided on-Site. As such, the proposed development does not have the potential to limit or interfere upon the current and future permitted operations of surrounding businesses.

9.21 The applicant's report has been reviewed by the PLA and the LBHF Noise Protection Team. Subject to the above proposed mitigation measures for the Cemex/ Comley Wharf site and a detailed noise emission assessment and operational management plan for Albert and Swedish Wharf being secured by conditions, officers raise no objections. The operational management plan would ensure that all mitigation is fully installed, maintained in perpetuity and correctly repaired in the event of failure.

9.22 Overall, the proposed mitigation measures are considered acceptable and in line with the agent of change principles set out in London Plan Policy London Plan D13 and D14 and Local Plan.

#### **Outlook/sense of enclosure**

9.23 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.

9.24 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.

9.25 In terms of outlook the closest properties are to north and west:

- Dwyer House No 2 Townmead Road (19m away and is 6/7-storeys);
- Nos. 4, 6, 8 and 10 Townmead Road (19m away and is 2/3-storeys);
- Spackman House No 12 Townmead Road (18.5m and is 5 storeys);
- 14-18 Townmead Road (20m at an oblique angle and 2/3-storeys) and
- Hurlingham Retail Park development (20m-22m away, under construction).

9.26 In respect of the existing opposing properties along Townmead Road, have variable heights that range between 2 and 7 storeys. All of these properties include habitable rooms in their south elevation facing the application site. Notably, the latest amended proposals include a reduction in height from 7 storeys to 5 storeys via the removal of 1 floor and the compression of floor to ceiling heights above the first floor. Overall, the reduced height results in- a 5-storey building that is more consistent with the tallest opposing buildings which are some 19m away. The proposed 5-storey height along Townmead Road is also comparable with the 5-storey shoulder height approved along Townmead Road as part of the 2015 planning permission for the redevelopment of a larger site which included Comley's Wharf (ref 2014/03250/FUL).

9.27 Based on on-site judgement, officers are satisfied that the development would not lead to any undue loss of outlook or increased sense of enclosure to the occupants of the occupants of the opposing existing developments along Townmead Road.

9.28 Along Wandsworth Bridge Road, the proposed development includes mid-blocks

which range between 5 and 10-storeys at shoulder height and the flank elevation of the 17 storey tall building fronting the river. To the west, on the opposite side of Wandsworth Bridge is Hurlingham Retail Park which is under construction; the opposing east facing elevation of that development is between 20m and 22m away and includes a range of buildings between 6 and 8 storeys. Based on the distance between the properties and site judgement, it is not considered that the proposals would have an undue impact in this South Fulham Riverside Regeneration area which supports tall buildings and high density residential development.

9.29 Overall, the development would not result in an unacceptable loss of outlook or increased sense of enclosure to adjacent properties complying with Policies DC1, DC4 and HO11 of the Local Plan (2018).

### **Overlooking/ Privacy**

9.30 SPD Key Principle HS7 (iii) 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.

9.31 The proposed residential units fronting the river would have no impact on existing properties, given the distance across the river. The nearest residential properties are

- To the E (beyond the Cemex site): Fulham Wharf above Sainsbury's site (46m)
- To the NW (opposite corner): 360 Wandsworth Bridge Road (46m)
- To the west: Hurlingham Retail Park redevelopment (range 20m-22m) and
- To north (opposing side of Townmead Road): Dwyer House (19m); Nos. 4, 6, 8 and 10 Townmead Road (19m); Spackman House (18.5m) and 14-18 Townmead Road (20m).

9.32 The building line of the proposed development would be set back at least 1.5m behind the site boundary. Given that the existing distances (in brackets above) between the opposing sites would not be reduced, none of the windows or balconies in the proposed development would be within 18m of existing opposing development. The proposals would not result in any undue loss of privacy in accordance with SPD Key Principle HS7 (iii).

### **Noise**

9.33 There are a number of noise generating activities and uses in close proximity of the site, including Wandsworth Bridge Road and Townmead Road and the adjacent safeguarded Comley's Wharf. The proposed reactivated wharf use and freight handling use also has the potential to generate noise impacts. The applicant's noise and vibration assessment states that the proposed residential homes could be provided with acceptable internal noise levels, in accordance with the relevant British Standards for daytime and night time noise. This would require appropriate mitigation measures in the form of acoustic glazing, winter gardens on some facades and levels within the scheme, including the implementation of the proposed enclosed concrete wharf box design. All apartments will be mechanically ventilated, so that they do not rely on openings in the facade to provide minimum amounts of ventilation required during the summer to address the risk of overheating.

9.34 Acoustic design principles have been incorporated in the design and layout of the scheme, with the blocks arranged to shelter the internal courtyard space from the noise associated with the adjacent roads and safeguarded wharf and by raising the level of the podium and residential homes on the site, so that it is situated between 10 and 20 metres above the level of the industrial / wharf uses. The noise levels within the northern courtyard would comply with the British Standard. However, the majority of the southern courtyard would not comply, given its more open nature. This is acceptable and the proposed mitigation measures should be secured, in line with London Plan Policy D14 and Local Plan Policies.

### **Daylight, Sunlight, Overshadowing & Solar Glare - neighbouring properties**

9.35 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.

9.36 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) requires development to be designed to respect residential amenity and to demonstrate good neighbourliness. This is expanded on within the Planning Guidance SPD (2018). Key Principles HS6 and HS7 of the SPD seek to protect the existing amenities of neighbouring residential properties, in terms of outlook, light, and privacy.

9.37 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. 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."

9.38 The daylight and sunlight assessment is included in the ES chapter 10 and supporting technical appendices have been amended. The assessments and supporting evidence have been reviewed by a daylight/sunlight advisor appointed by the Council (Schroeders Begg (UK) LLP) having regard to the sensitivities and objections received on this matter.

9.39 The quality of the daylight and sunlight within the neighbouring properties has been assessed using the Vertical Sky Component (VSC), No Sky Line contour (NSL) Average Daylight Factor (ADF) and Annual Probable Sunlight hours (APSH)

assessments as recommended within the BRE document 'Site layout for daylight and sunlight'.

- 9.40 Alternative target values referred to for skylight to neighbouring properties (Daylight VSC) and sometimes sunlight, are often used in dense urban areas have been applied in this case. However, in the first instance, background to the BRE Guide and tests and guidelines are provided as follows.
- 9.41 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.
- 9.42 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.
- 9.43 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 whole year greater than 4% of annual probable sunlight hours, which would represent an adverse impact.
- 9.44 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
- 9.45 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.
- 9.46 Where reductions do not meet BRE Guidelines (for daylight and / or sunlight), ordinarily reductions will be noticeable. For transgressions not meeting target BRE Guidelines for daylight, these have initially been considered in reference broad reduction adversity as follows:
- Minor Adverse: Reductions in VSC or NSL of >20% to 30%.



- Moderate Adverse: Reductions in VSC or NSL of >30% to 40; and
- Major Adverse: Reductions in VSC or NSL of greater than 40%.

Alternative Targets for Daylight – Neighbouring Review

9.47 Whilst no Alternative Target has been set for this proposed redevelopment, it is acknowledged that there is minimal massing currently existing on the application site and that suitable and flexible interpretation of the BRE Guide is relevant; when commencing with limited existing massing, some transgressions to BRE guidelines are anticipated for appropriate development of the site. Appropriate judgement should also be considered in terms of retained levels of daylight and sunlight in consideration of various applicable appeal cases of similar context.

**Daylight Review of Affected properties**

9.48 Daylight results (and as applicable for sunlight) were tested for the following neighbouring properties;

Broadly north, north-east or north-west of site:

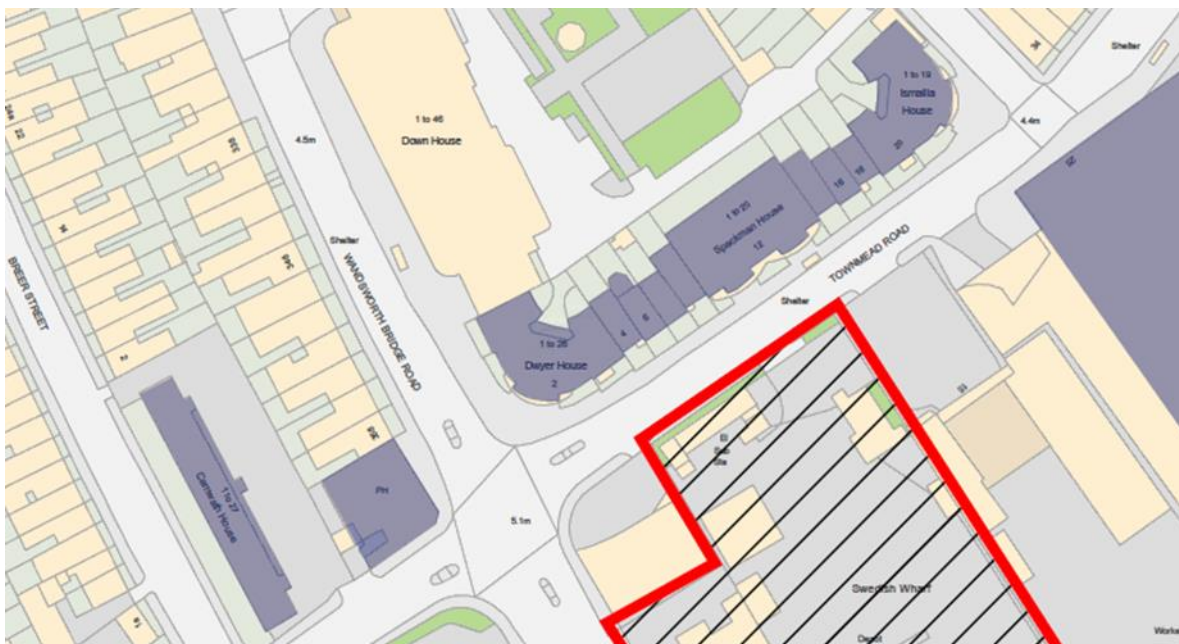
- Dwyer House, No. 2 Townmead Road
- Nos. 4, 6, 8 & 10 Townmead Road
- Spackman House, No.12 Townmead Road
- Ismailia House, No. 20 Townmead Road

Broadly east & north-east of site:

- Fulham Wharf (Westbourne Apartments & Ravensbourne Apartments)

Broadly west, north-west & south-west of site:

- Carnwath House, Carnwath Road
- 360 Wandsworth Bridge Road, (former Hurlingham PH)
- Hurlingham Retail Park (consented, yet to be built)



**Image 15: Relationship of application site with neighbours to the north**

9.49 For applicable reductions in daylight to the following properties, these meet BRE Guide default target criteria and accordingly not discussed further;

Ismaila House, No. 20 Townmead Road

No. 360 Wandsworth Bridge Road (former Hurlingham Public House)

Fulham Wharf (Westbourne Apartments & Ravensbourne Apartments)

9.49 For the remaining neighbouring properties have reductions not meeting BRE Guide default target criteria, the effects of the proposal are summarised as follows;

Dwyer House, No. 2 Townmead Road:

- 26 No. windows (window groups) each serving a habitable room front onto Townmead Road and applicable for analysis.
- For daylight VSC, 15 No. out of 26 No. rooms served by windows having reductions not meeting BRE Guidelines are summarised in **Table 1**.

**Table 4 Dwyer House – Daylight VSC reductions not meeting BRE Guide default target criteria.**

Floor	Room Ref.	Window Ref.	Existing VSC	Proposed VSC	Reduction %
<b>Living/dining (*anticipated to incorporate a kitchen)</b>					
Ground	R1/F00	W1/F00	17.8	13.9	21.9%
Ground	R3/F00*	W3/F00	18.5	10.4	43.8%
1 <sup>st</sup>	R1/F01	W1/F01	27.4	21.9	20.1%
1 <sup>st</sup>	R3/F01*	W3/F01	26.9	17.6	34.6%
2 <sup>nd</sup>	R3/F02*	W3/F02	28.7	19.8	31.0%
3 <sup>rd</sup>	R3/F03*	W3/F03	30.1	21.8	27.6%
4 <sup>th</sup>	R3/F04*	W3/F04	31.3	23.9	23.6%
<b>Bedrooms</b>					
Ground	R2/F00	W2/F00	24.7	16.7	26.2%
Ground	R4/F00	W4/F00	28.6	16.0	34.7%
1 <sup>st</sup>	R2/F01	W2/F01	27.7	18.5	27.1%
1 <sup>st</sup>	R4/F01	W4/F01	30.6	17.7	32.2%
2 <sup>nd</sup>	R2/F02	W2/F02	29.4	20.1	25.0%
2 <sup>nd</sup>	R4/F02	W4/F02	32.2	19.7	28.9%
3 <sup>rd</sup>	R2/F03	W2/F03	30.8	21.7	22.3%
3 <sup>rd</sup>	R4/F03	W4/F03	33.5	21.9	25.5%

9.50 From **Table 4**, whilst there are transgressions to BRE Guidelines, in consideration of living/dining rooms, the majority of reductions are 'minor adverse' (an isolated 1 No. 'major adverse' reduction and 4 No. 'moderate adverse' reduction); supplementary assessment has been issued for the theoretical analysis of 'without balconies' and in almost all instances, BRE Guide target for reduction would be met evident that balcony soffits are adding some inherent sensitivity. For bedrooms with reductions not meeting BRE Guide default target criteria, the majority of reductions are 'minor adverse' (an isolated 2 No. 'moderate adverse' reduction); in all instances, a VSC of 16 or above is retained which could be considered reasonable for bedroom use in such context.

9.51 For daylight distribution, reductions to all living/dining rooms (including those incorporating a kitchen), where reductions are applicable in daylight distribution these meet BRE Guide default target criteria. For bedrooms, all reductions would also meet the BRE Guide default target criteria except in 5 No. isolated instances where reductions could be considered 'minor / moderate'.

**Nos. 4, 6, 8 & 10 Townmead Road:**

9.52 These 4 No. dwellings appear dual-aspect and living rooms appear to be served by windows in the rear elevation thus facing away from the proposal / unaffected by the proposal. For those habitable rooms served by windows within the front elevation / facing the proposal, these appear to be predominantly bedrooms plus each having a ground floor kitchen (the remaining hallways and bathrooms are not considered habitable rooms / not applicable for review).

9.53 VSC reductions do not meet BRE Guide default target criteria to all habitable rooms analysed are typically 'moderate adverse' reductions to all habitable rooms served by windows within the front elevation / facing the proposal. However, notwithstanding such reductions, in all instances, a VSC of 17.5 or above is retained for bedrooms which should be considered reasonable for bedroom use in such context. For the 4 No. kitchens, retained VSCs range 16.1 to 19.7 reflecting the lowest floor / ground floor reviewed. Potentially, if the kitchens are falling below 13m<sup>2</sup> in area (thus duration of occupancy may be limited), in reference to the Major of London Housing SPG, given the size of the rooms, there is some judgment in interpretation whether the room is considered strictly 'habitable' in reference to the SPG (with kitchens above 13m<sup>2</sup>-15m<sup>2</sup> usually always included as habitable rooms), although it is important to note, LBH&F policies do not have such exclusion but appeal decisions still being relevant.

9.54 Daylight Distribution: Reductions in daylight distribution do not meet BRE Guide default target criteria to all habitable rooms analysed and considered 'major adverse' in terms of reduction. However, the majority of rooms are bedrooms and the BRE Guide does recognise that daylight distribution is less important for bedrooms. Retained values for the kitchens based upon the analysis submitted indicate that circa half of the room area at working plane would have access to direct skylight.

### **Spackman House, No. 12 Townmead Road:**

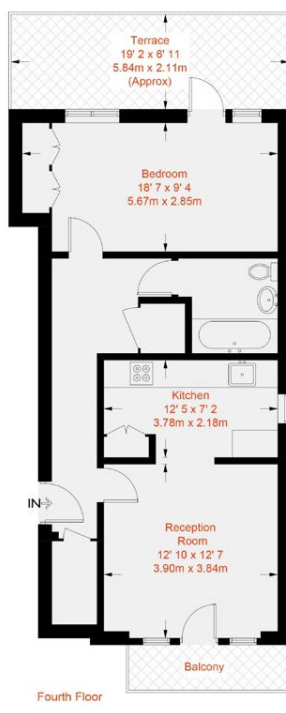
9.55 Spackman House comprises 20 No. flats (4 No. flats x 5 floors) and the living rooms to these flats are served by windows in the front elevation / site facing. The image below depicts the elevation of Spackman House facing site.



**Image 16** – Spackman House, 12 Townsmead Road – elevation facing site

9.56 From Image 16 we highlight that due to the two, projecting communal staircase / lobbies, associated living/dining room windows either side of each respective projecting staircore are recessed due to the projecting 'winged-walls of the staircore. Furthermore, the living/dining windows have balcony soffits projecting above these windows at ground, 1<sup>st</sup> and 2<sup>nd</sup> floor (and the soffit at ground floor is particularly pronounced as this extended for incorporation into the staircore entrance canopies). Both of these features restrict daylight availability resulting in greater inherent sensitivity to obstruction opposite.

9.57 A floor-plan of a 4<sup>th</sup> floor flat within Spackman House is presented within Image 17 – Spackman House – 4<sup>th</sup> floor flat (assumed other flats of similar arrangement).



**Image 17** – Spackman House

9.58 For daylight VSC, 16 No. out of 20 No. rooms served by windows have reductions not meeting BRE Guidelines are summarised in Table 5.

**Table 5 – Spackman House – Daylight VSC reductions summary (living/dining rooms).**

Floor	Room Ref.	Window Ref.	Existing VSC	Proposed VSC	Reduction %
Ground	R13/F00	W13/F00	14.6	3.6	75.3%
Ground	R14/F00	W14/F00	12.8	6.2	51.6%
Ground	R15/F00	W15/F00	11.3	5.1	54.9%
Ground	R16/F00	W16/F00	12.1	7.3	39.7%
1 <sup>st</sup>	R13/F01	W13/F01	23.2	11.7	49.6%
1 <sup>st</sup>	R14/F01	W14/F01	21.2	13.1	38.2%
1 <sup>st</sup>	R15/F01	W15/F01	21.4	13.6	36.4%
1 <sup>st</sup>	R16/F01	W16/F01	20.8	14.8	28.8%
2 <sup>nd</sup>	R9/F02	W9/F02	24.9	14.3	42.6%
2 <sup>nd</sup>	R10/F02	W10/F02	22.8	15.2	33.3%
2 <sup>nd</sup>	R11/F02	W11/F02	23.0	15.8	31.3%
2 <sup>nd</sup>	R12/F02	W12/F02	22.2	16.8	24.3%
3 <sup>rd</sup>	R5/F03	W5/F03	32.2	22.9	28.9%
3 <sup>rd</sup>	R6/F03	W6/F03	30.8	24.2	21.4%
3 <sup>rd</sup>	R7/F03	W7/F03	30.9	24.7	20.1%
3 <sup>rd</sup>	R8/F03	W8/F03	29.8	25.0	16.1%
4 <sup>th</sup>	R5/F04	W6/F04	27.7	20.4	26.4%
4 <sup>th</sup>	R6/F04	W7/F04	26.0	22.2	14.6%
4 <sup>th</sup>	R7/F04	W8/F04	26.7	21.8	18.4%
4 <sup>th</sup>	R8/F04	W9/F04	24.8	22.5	9.3%

9.59 For daylight VSC, 16 No. out of 20 No. rooms served by windows have reductions not meeting BRE Guidelines are summarised in Table 5. For these 20 No. living/dining rooms applicable for review, for ground, 1<sup>st</sup> & 2<sup>nd</sup> floor i.e. those windows with a balcony soffit above, reductions are considered typically 'major adverse' reductions at ground floor and typically 'moderate adverse' reductions at 1<sup>st</sup> and 2<sup>nd</sup> floor. For the 3<sup>rd</sup> & 4<sup>th</sup> floors i.e. without the balcony soffit above, reductions are typically 'minor adverse' at 3<sup>rd</sup> floor and typically reductions meet BRE Guide default target criteria at 4<sup>th</sup> floor.

9.60 It is noted that existing VSC values are low to the ground floor windows; VSCs ranging just 11.3 – 14.6 despite very limited massing directly opposite / a predominant existing open site (although obstruction existing from Comley's Wharf office block). Retained VSC values range just 3.6 – 7.3 at ground floor (thus both existing and proposed values below mid-teens, especially in the proposed scenario). Retained VSC values at 1<sup>st</sup> floor are ranging 11.7 – 14.8 (thus relatively close to but below mid-teens), for 2<sup>nd</sup> floor and VSC values ranging 14.3 – 16.8

(thus broadly mid-teens). For the 3<sup>rd</sup> and 4<sup>th</sup> floor, VSC values are in excess of a VSC of 20 thus beyond 'mid-teens'.

9.61 The BRE Guide recognises that balcony soffits can have a significant restriction on direct skylight with inherent sensitivity relating to windows below balcony soffit positions. Accordingly, the BRE Guide does all consideration of the theoretical consideration of 'without balcony' analysis to enable consideration of the contribution factor of inherent sensitivity to such windows. Equally, the BRE Guide recognises that larger reductions in VSC may be unavoidable if the existing window has projecting wings on one of both sides. Accordingly, in order to seek to remove the inherent sensitivity of these windows due to have a recessed position resulting from both the balcony soffits (as applicable) and winged walls, supplementary analysis review has presented the 'theoretical analysis' of 'without balconies and without winged walls' within Table 6;

**Table 6 – Spackman House – Daylight VSC reductions summary WITHOUT balcony soffits or winged walls – theoretical review (living/dining rooms).**

Floor	Room Ref.	Window Ref.	Existing VSC	Proposed VSC	Reduction %
Ground	R13/F00	W13/F00	32.1	19.9	38.0%
Ground	R14/F00	W14/F00	31.5	22.7	27.9%
Ground	R15/F00	W15/F00	31.1	23.0	26.0%
Ground	R16/F00	W16/F00	30.1	23.4	22.3%
1 <sup>st</sup>	R13/F01	W13/F01	33.7	22.2	34.1%
1 <sup>st</sup>	R14/F01	W14/F01	33.1	24.8	25.1%
1 <sup>st</sup>	R15/F01	W15/F01	32.8	25.0	23.8%
1 <sup>st</sup>	R16/F01	W16/F01	31.8	25.2	20.8%
2 <sup>nd</sup>	R9/F02	W9/F02	35.1	24.4	30.5%
2 <sup>nd</sup>	R10/F02	W10/F02	34.5	26.7	22.6%
2 <sup>nd</sup>	R11/F02	W11/F02	34.1	27.0	20.8%
2 <sup>nd</sup>	R12/F02	W12/F02	33.1	27.1	18.1%
3 <sup>rd</sup>	R5/F03	W5/F03	36.1	26.8	25.8%
3 <sup>rd</sup>	R6/F03	W6/F03	35.5	28.7	19.2%
3 <sup>rd</sup>	R7/F03	W7/F03	35.1	28.9	17.7%
3 <sup>rd</sup>	R8/F03	W8/F03	34.2	28.8	15.8%
4 <sup>th</sup>	R5/F04	W6/F04	35.8	28.5	20.4%
4 <sup>th</sup>	R6/F04	W7/F04	35.7	30.4	14.8%
4 <sup>th</sup>	R7/F04	W8/F04	35.5	30.6	13.8%
4 <sup>th</sup>	R8/F04	W9/F04	34.3	29.9	12.8%

9.62 From Table 6 for the 'theoretical review' (without balcony soffits or winged walls), it is noted that typically, reductions would be typically 'minor adverse' reduction to

ground, 1<sup>st</sup> and 2<sup>nd</sup> floor (i.e. with the balcony soffits and winged walls now removed) and at 3<sup>rd</sup> and 4<sup>th</sup> floor (i.e. winged walls removed), reductions considered to be typically meeting BRE Guide. Thus, whilst reductions would not typically meet BRE Guide at ground, 1<sup>st</sup> and 2<sup>nd</sup> floor in the 'theoretical review' these are relatively close to target thus it can be concluded that the inherent sensitivity of the balconies and winged walls is a significant factor in the degree of adversity in real terms to the overall analysis results. Reductions at 3<sup>rd</sup> and 4<sup>th</sup> floor would typically meet BRE Guide in this theoretical review.

9.63 In conclusion, notwithstanding the adversity of impacts / reductions in real terms and which will be noticeable, actual retained levels of daylight VSC could be considered acceptable to 1<sup>st</sup> and 2<sup>nd</sup> floor and readily acceptable at 3<sup>rd</sup> and 4<sup>th</sup> floor. Whilst it is noted existing levels at ground floor are already particularly low and likely to have necessitated some inherent increased use of artificial lighting then ordinarily the case, such increase in impact is anticipated to result in some greater reliance on artificial lighting occurring. However, to highlight, even if a proposed scheme was to fully meet BRE Guide default target, a retained VSC of 9 would still result to one of the living rooms (in consideration of a 20% reduction to an existing VSC value of 11.3 in respect of window ref. W15/F00) thus significantly below 'mid-teens' even in such a scenario.

9.64 For Daylight Distribution, all rooms meet BRE Guide default target criteria for daylight distribution except in 3 No. isolated instances; these relate to furthest living/dining room to the west at ground, 1<sup>st</sup> & 2<sup>nd</sup> floor which is the room which is most centrally opposite the proposal and equally having inherent imitations of winged walls and balcony soffits applicable to these particular floors. For these 3 No. isolated living/dining rooms not meeting BRE Guide default target criteria, given that existing levels of daylight distribution are almost 100% of the room able to receive direct skylight at the working plane, even with moderate reduction, for two of these rooms, in the proposed scenario, a daylight distribution of over 60% is retained which should be considered reasonable whilst the remaining living room, being at ground floor is the worst affected with a retained daylight distribution of circa 40% so a significant part of the front half of the main living room would still have direct skylight at the working plane.

9.65 Similar to daylight VSC, a theoretical review of without balcony soffit and without winged walls has been undertaken which would result for these particular 3 No. rooms having typically, 2 No. rooms just falling into 'moderate adverse' reduction and 1 No. room 'minor adverse' reduction. Thus, for these isolated 3 No. rooms, still relatively close to BRE Guide target for this theoretical review.

9.66 Similar to daylight VSC, a theoretical review of without balcony soffit and without winged walls has been undertaken which would result for these particular 3 No. rooms having typically, 2 No. rooms just falling into 'moderate adverse' reduction and 1 No. room 'minor adverse' reduction. Thus, for these isolated 3 No. rooms, still relatively close to BRE Guide target for this theoretical review.

#### **Nos. 14, 16, 18 Townmead Road:**

9.67 VSC reductions meet BRE Guide default target criteria to all habitable rooms analysed except relating to the windows serving 2 No. rooms within No.14 Townmead Road (such reductions, are considered very close to BRE Guide default

target and retained values of VSC would be 19.8 and 21.4 respectively which should be considered readily acceptable.

9.68 For any applicable reduction in daylight distribution, these meet BRE Guide default target criteria.

**Carnwath House, Canwath Road:**

9.69 There is one isolated reductions to VSC not meeting BRE Guide default target and for the given context, should be considered acceptable.

**Hurlingham Retail Park, 362 Wandsworth Bridge Road & 1-3 Carnwath Road (redevelopment to mixed-use residential scheme – not yet built):**

9.70 This residential mixed-use scheme to the south-west of site is consented but not yet built (although the original planning permission ref. 2013/02870 dated December 2014 has been implemented). The north-east elevation of this consented scheme will be facing the proposal (opposite side of Wandsworth Bridge Road) and containing residential on the upper floors. The BRE Guide relevant at that time was the 2<sup>nd</sup> edition (2011), which for review of the provision of daylight within the proposal, this was considered on the basis of the Average Daylight Factor (ADF) seeking a target ADF for a given room use (1% ADF for bedrooms and 1.5% for living rooms or living/kitchen/dining rooms and 2% for habitable kitchens).

9.71 Given the consented Hurlingham proposed residential block does not currently exist (although consent implemented with some initial enabling works), in reference to BRE Guide methodology, it is reasonable to consider differing review to that in comparison of an existing building since currently and within the short to medium-term future, there are no occupants that could experience a shift change in daylight or sunlight.

9.72 Accordingly, given provision of daylight within the consented Hurlingham scheme was historically reviewed in reference to the Average Daylight Factor (ADF), for further continuity (and given the Hurlingham scheme is not yet built), review of the impact of the application upon this consented scheme has also been considered as to what ADF would result in the proposed scenario (if both schemes were to be built).

9.73 Whilst acknowledged as withdrawn, the former BRE Guide 2<sup>nd</sup> edition (2011) is relevant for ADF review and for the ADF input considered, reference has been made to the BRE Guide 2<sup>nd</sup> edition for this purpose. For this Alternative Target approach, for continuity, ADF is considered the most appropriate measure although it is accepted that such a review is reference to the former BRE Guide - Site layout planning for daylight and sunlight – a guide to good practice (2<sup>nd</sup> edition, 2011). Whilst the 2<sup>nd</sup> edition of the BRE Guide was withdrawn and replaced with the 3<sup>rd</sup> edition, published on the 8<sup>th</sup> June 2022, it is considered reasonable to still consider the impact of the application proposal upon the consented Hurlingham scheme in reference to Alternative Target criteria on an ADF basis, as all in reference to the BRE Guide 2<sup>nd</sup> edition. For reference, we extract the para. F8 of the BRE Guide 2011 and in particular F8 sub-clause (i) & (ii) as follows;



*'F8 - However, there are some situations where meeting a set ADF target value with the new development in place could be appropriate as a criterion for loss of light:*

- (i) Where the existing building is one of a series of new buildings that are built one after another, and each building has been designed as part of the larger group*
- (ii) As a special case of (i), where the existing building is proposed but not built. A typical situation might be where the neighbouring building has received planning permission but not yet been constructed...'*

9.74 In having considered such Alternative Target criteria, a reasonable approach is;

- A) To consider, in the first instance, the proposed habitable rooms within the Hurlingham scheme for the given room use, that could still achieve the target ADF for the given room use once the effect of the Albert & Swedish Wharf application has been factored. Where losses are applicable but the target ADF for the given room use is still met, then this can be considered as meeting target. Target ADF has been considered as 1.5% for living/kitchen/dining rooms (thus ADF for the room targeted for predominant room use rather than the BRE Guide default) and 1% for bedrooms.
- B) Where the ADF value falls below the target for the given room use, the target ADF in the proposed scenario (and in some instances, the room ADF may have already been below the target ADF value before the effect of the Albert & Swedish Wharf application is considered), then to consider whether such losses and retained levels could still be considered reasonable within the overall context of such factors as a urban London and development opportunity area.

9.75 We summarise and comment upon the impact to the proposed habitable rooms within Hurlingham on an ADF basis as follows;

**Daylight ADF:**

9.76 In the first instance, a summary of the impact of the proposal upon rooms likely to have some affected / reasonable to include has been presented as follows

**Table 7 Hurlingham (consented scheme not yet built) – ADF Summary for rooms applicable for review**

Floor	Total rooms reviewed	ADF room analysis		ADF below room target	
		Still Meets ADF target after any losses	NOT Meeting ADF target	Loss not exceeding 20% but room originally met ADF	Greater losses (exceeding 20%)
3 <sup>rd</sup>	16	7	9	2	7
4 <sup>th</sup>	16	9	7	2	5
5 <sup>th</sup>	16	11	5	2	3
6 <sup>th</sup>	16	12	4	2	2
7 <sup>th</sup>	8	8	-	-	-
8 <sup>th</sup>	6	6	-	-	-
<b>Total</b>	<b>78</b>	<b>53 (c.68%)</b>	<b>25 (c.32%)</b>	<b>8</b>	<b>17</b>

- 9.77 From this ADF Summary Table 7, 78 No. rooms have been considered as applicable for ADF analysis review, served by window(s) where this is the potential for a reduction / possible affect from the proposal; predominantly, these rooms therefore, have windows facing north-east. Whilst the detailed analysis within the application confirms that there would be some reduction in ADF to almost all of these rooms analysed (as ordinarily the case where this is an increase in massing / greater obstruction to daylight availability), in consideration of such reductions, 53 No. rooms out of the 78 No. rooms (thus circa 68%), would still retain a target ADF that meets the ADF target considered for the given room use.
- 9.78 For the 25 No. rooms not meeting the ADF target for the applicable room use, 7 No. would have limited losses not exceeding 20% from the original ADF value. For the remaining 17 No. rooms, 12 No relate to living/dining/kitchen rooms and 5 No. bedrooms.
- 9.79 For the 12 No. living/kitchen/dining rooms, the retained ADF ranges 0.9 to 1.1 (thus broadly bedroom quality) except in three isolated instances where the retained ADF is less at 0.6 to 0.7. For the 5 No. bedrooms, retained ADF 0.6 to 0.7.
- 9.80 As background, it is often the case in urban development that there is some limited proportion of rooms not meeting ADF target due to various factors within site constraints including development in denser urban environments where provision of daylight can be harder to achieve. We highlight that when the Hurlingham scheme was designed, this was effectively over an open-site opposite and so it is not unsurprising to such reductions. For 68% of the rooms applicable for review, these would continue to meet target ADF for the given room use. For the remainder, which some impacts are noted, typically, the retained ADF values could be considered relatively close / not unusually for a small proportion of rooms within in a multi-unit scheme achieving such values.
- 9.81 If broad consideration to EIA was given in reference to Hurlingham, we are of the opinion such impact would be broadly 'minor to moderate adverse' overall.

### **Daylight – Conclusion**

- 9.82 Given that there is minimal massing on site, for meaningful development in consideration of this being an opportunity / regeneration area, some transgressions from BRE Guide default target criteria. The effects to each property having reductions not meeting BRE Guide default target criteria has been summarised.

### **Sunlight**

- 9.83 All applicable properties have been considered for sunlight review. In terms of room use, living rooms are the main focus for review and where reductions are applicable, these meet BRE Guide to existing neighbouring residential properties except to Spackman House and summarised as follows for reductions not meeting BRE Guidelines;
- There are 4 No. living rooms at ground having reductions not meeting BRE Guide default target criteria for APSH (and for 3 No. are also not meeting APSH for winter hours). In addition, there is 1 No. isolated

living/dining rooms not meeting BRE Guide for APSH winter hours only (at 1<sup>st</sup> floor); the table below summarises these results (not meeting BRE Guide default target criteria).

**Table 8 Spackman House – Sunlight reductions not meeting BRE Guide default target criteria (living/dining rooms).**

Floor	Room Ref.	Window Ref.	APSH			APSH winter hours		
			Extg.	Prop.	Reduction	Extg.	Prop.	Reduction
Ground	R13/F00	W13/F00	31	14	54.8%	Meets BRE		
Ground	R14/F00	W14/F00	29	19	34.5%	11	2	81.8%
Ground	R15/F00	W15/F00	24	11	54.2%	15	3	80.0%
Ground	R16/F00	W16/F00	25	18	28.0%	10	3	70.0%
1 <sup>st</sup>	R14/F01	W14/F01	Meets BRE			16	3	81.3%

- From this table, reductions to the ground floor APSH would result in ‘major adverse’ reductions to 2 No. rooms and more ‘minor / moderate adverse’ reductions to the remaining 2 No. rooms. For all other living rooms within Spackman House, where reductions are applicable, these meet BRE Guide default target.
- For APSH winter hours, there are 4 No. living rooms (including 3 No. at ground floor), would have ‘major adverse’ reductions although winter sunlight is often harder to maintain given the low angle of the sun appearing in the sky.
- As for daylight review, these results are in part due to inherent imitations of winged walls and balcony soffits (although the latter not applicable for the 3<sup>rd</sup> floor). For theoretical review without winged walls and balcony soffits, in terms of reductions to APSH, these would be meet target or be very close. There would still be significant reductions to winter hours but as highlighted, winter sunlight is often more sensitive to development changes.

### **Overshadowing Existing Amenity Areas**

9.84 5 No. neighbouring amenity areas have been considered for review;

Area	Description
1	Collective main amenity area for Dywer House, Spackman House, Ismailia House & Down House.
2	Rear gardens to Nos. 23-51 (odds) De Morgan Road
3	Fulham Wharf communal Terrace Garden
4	Fulham Wharf communal Courtyard Garden
5	Hurlingham (consented scheme) – communal courtyard

9.85 Whilst typically, there would be some limited effect to these amenity areas, these are a reasonable distance from the proposal. Transient overshadowing assessment has been undertaken and submitted and from that submission, we have considered the contents and whilst analysis of the BRE Guide 2 hour

sunlight test at 21<sup>st</sup> March has not been provided, we have interpreted from the shadow review that should the 2 hour test be formally undertaken, it is evident that there would be negligible loss / BRE Guide target criteria would be met.

9.86 In summary, effects to sunlight to amenity areas are limited and anticipated that they would readily meet the BRE Guide default target criteria in respect of the BRE Guide review of two hours sunlight test at the 21<sup>st</sup> March (equinox).

9.87 **Sunlight – Impact upon neighbouring PV panels:**

Neighbouring Fulham Wharf has PV panels located on the roof. Preliminary assessment has been undertaken in reference to the BRE Guide and impact to sunlight is not more than significant 0.9 times former provision; thus more detailed review is not considered necessary in respect to BRE Guidance / limited impact.

### **Daylight and Sunlight to Proposed Residential**

9.88 A daylight and sunlight assessment has been undertaken for the habitable rooms within the proposed residential part of the development. Habitable rooms in residential properties are defined as kitchens, living rooms, dining rooms and bedrooms.

9.89 Daylight has been reviewed on an illuminance method (using climate files) and in terms of quantitative review, circa 81% of habitable rooms (635 No. out of 786 No. habitable rooms) meet target provision for daylight which could be considered reasonable for the given context. In terms of the 151 No. rooms not meeting target, these relate to 101 No. living rooms, 40 No. bedrooms and 10 No. kitchens.

9.90 From a qualitative viewpoint, it is reasonable to consider that 94 No rooms are still reasonably close to daylighting target criteria. For the remaining 57 No. rooms (35 No. living rooms and 21 No. bedrooms and 1 No. kitchen), there are greater transgressions from daylighting targets. However, it is noted that just over half of these rooms relate to proposed dwellings for market sale. It is not uncommon for some limitations to daylighting levels to some habitable rooms within a major residential development, especially at lower floors and incorporation of balcony amenity areas etc (soffit above windows) which inherently limit daylight provision but seen as important amenity.

9.91 In terms of sunlight exposure to dwellings, this has been reviewed and 76% of dwellings meet BRE Guide target criteria; it could be considered that is still a reasonable provision in a major multi-dwellings scheme with various site constraints.

9.92 In terms of sunlight to amenity, whilst the main courtyard amenity area does not meet BRE Guide target criteria (36% of the area able to receive 2 hours or more of sunlight on the 21<sup>st</sup> March equinox – target is 50% area), there are 3 No. additional areas that readily do meet target and we understand some will be accessible to all residents as an alternative, if desirable.

9.93 It is concluded that generally, reasonable daylight and sunlight provision has been made for the future occupants of the proposed residential part of this scheme given a major multi-dwellings scheme with various site constraints.

## **10.0 DESIGN, HERITAGE, AND TOWNSCAPE**

### **Design**

- 10.1 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.
- 10.2 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.
- 10.3 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.

10.4 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**

10.5 The architectural character of the proposal scheme is informed by both the historic context of the site and character of new development being brought forward as part of the regeneration of the South Fulham Riverside Regeneration Area. The development seeks to complement the approach of adjacent consented/implemented and completed developments; whilst also seeking to reference the prominent frontage of the site to the river and gateway to Wandsworth Bridge.

10.6 The scheme seeks to vary character between the different blocks introducing three different typologies of development.

### River frontage buildings

10.7 Towards the river frontage, taller buildings, with an 'industrial riverside' appearance are proposed. The two blocks, introduce a strong metal Corten frame to give the building a strong structural appearance and vertical hierarchy. These elements are supplemented by secondary and tertiary elements detailed in glazing and metal cladding panels.

10.8 At ground floor level the Corten detailing is extruded to the recessed external, public staircase which provides access to the upper level riverwalk and podium amenity areas. (This area also provides a functional relationship and visual acknowledgement of the retained wharf use). The base of river frontage buildings is considered to be of a high-quality and open-up views/access to the public podium level.

10.9 The middle section of these blocks is simpler in detailing but serves to allow the Corten frame to appear as the primary elevation detail with other elements of elevations appearing recessive in key views. The horizontal design of balconies would complement the character of those within adjacent Fulham Wharf development.

10.10 The crown of these buildings is designed again to allow the Corten frame to open up to the skyline and enclose upper floor rooftop plant. The approach allows for the crown of the building to appear more legible from surrounding views of the building and again, provide a wayfinding experience to Wandsworth Bridge.

### Mansion Blocks

10.11 The mansion block typologies are designed to incorporate brick façades and well-ordered elevations with lightweight metal detailed, upper floor 'pavilion' style structures at roof level. The design of these blocks is considered to create a complementary relationship to the style and character of neighbouring developments within the Fulham Reach and Hurlingham Retail Park developments, which would give some consistency to detailing of the area.

### Warehouse Block

10.12 The warehouse block is again detailed in brick with a structural grid to the façade of this building. the façade facing to Townmead Road features additional detailing and a saw-tooth roofscape to complement the treatment of the historic, locally listed façade of the original Fulham Wharf development to the east. The approach is again considered robust and would complement the character of adjacent development.

10.13 Overall, the scheme is considered to represent a high quality of design, which makes a positive contribution to the site and the legibility of this prominent site. The scheme would have its own character, but also complement the character of adjacent developments and the regeneration of the South Fulham Riverside Regeneration Area.

## **Tall Building**

### **Tall Building Assessment.**

10.14 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.

10.15 The application site is situated in an area within which tall/large buildings would be considered appropriate, the South Fulham Riverside Regeneration Area. Therefore, the principle of tall buildings-up to 17 storeys would comply with Policy DC3 in this regard.

10.16 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;

The proposal seeks to bring forward tall buildings to the central and southern aspects of the site, with the tallest buildings being 13 and 17 storeys respectively to the prominent river frontage of the site. The arrangement of buildings on site, seeks to step-up in scale from the 5-storey massing of the block facing Townmead Road, to the more significant blocks fronting the river.

This approach is consistent with other recent developments in the local area, including the Fulham Wharf and Hurlingham Retail Park developments, which illustrate a similar stepping up in building form towards the river frontage. 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;

The architectural appearance of the development is considered to represent a high-quality of design. The lower blocks fronting Townmead Road and Wandsworth Bridge Road are designed to follow a warehouse style appearance which is complementary to the historic context of the site and its surroundings. These blocks are complementary to the adjacent Fulham Wharf development. The taller buildings fronting the river are of a slightly different character and serve to respond well to the form and appearance of the other tall buildings in this environment; the Corten structure and supplementary detail of these blocks is considered to represent a high-quality of design. Further detail of the detailing and materials of all blocks would be subject to conditions.

- 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;

The proposals are accompanied by a Townscape and Visual Impact assessment which illustrates the wider impact of the scheme upon a series of surrounding townscape views. Following due consideration of these views, whilst it is acknowledged that the development would result in some change to particular views, this is not considered to have an adverse impact overall. Changes to views would be moderate to beneficial and would not result in detrimental impacts upon the skyline of Hammersmith and Fulham. The views from the river would be enhanced and the tallest building would provide a positive wayfinding experience to Wandsworth Bridge.

- 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;

The impact of the development has been fully considered upon heritage assets as set out in the latter sections of this report. Given that the proposal site is situated in the Sands End conservation area, the proposals have been considered with due regard the tests of both the NPPF and Planning (Listed Buildings and Conservation areas) Act 1990. The Sands End conservation area is ongoing significant change as part of the redevelopment of sites within the South Fulham regeneration area and the proposals are considered acceptable in this regard. The proposals are not considered to result in any harm to any heritage assets surrounding the application site. (Again, further detailed assessment of this element is provided later in this report).

- e) is supported by appropriate transport infrastructure;



The development is car-free and supported by adequate cycle storage provision.

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

The retention of the operational wharf as part of the development has limited the opportunity to create fully animated and active ground floor treatments. However, the integration of multiple residential entrance cores, the stepped riverwalk, public podium deck and active uses to the river frontage are considered appropriate in terms of providing animation to the base of the building.

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

The development is designed to bring forward proposals to upgrade and complement the existing movement and permeability of the wider Thames footpath as delivered by the redevelopment of other sites within this area. The retention of the functional wharf, (as required by policy), does however limit the scope permeability across the site. However, the design of the proposal is considered alongside other principles of the proposal scheme, to improve upon the current arrangement adding to the permeability and public realm of the area.

- 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;

The current design is based on sustainable design and construction principles. The development includes a range of energy efficiency measures to help with over-heating. An Air Source Heat Pump (ASHP) energy system is proposed as are PV panels on the roof. A Whole Life-cycle Carbon Assessment has been undertaken taking into account the materials quantities and loads, the operational energy consumption of the built scheme, with total emissions estimated; 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. These details are secured by conditions.

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

The proposals are not considered to have an undue 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.

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.

10.17 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.

10.18 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. Consequently, the proposed development would constitute development of tall buildings for the purpose of Policy D9.

10.18 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

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.

10.19 The proposed development varies between 5 to 17 storeys would impact upon a range of views of the site the proposals are accompanied by a Townscape and Visual Impact assessment which illustrates the wider impact of the scheme upon a series of surrounding townscape views. Following due consideration of these views, whilst it is acknowledged that the development would result in some change to particular views, this is not considered to have an adverse impact overall. Changes to views would be moderate to beneficial and would not result in detrimental impacts upon the skyline of Hammersmith and Fulham. The views from the river would be enhanced and the tallest building would provide a positive wayfinding experience to Wandsworth Bridge.

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.

10.20 The architectural quality of the development has been fully considered throughout the design process and subject of Design Review. The architectural appearance of the development is considered to represent a high-quality of design. The lower blocks fronting Townmead Road and Wandsworth Bridge Road are designed to follow a warehouse style appearance which is complementary to the historic context of the site and its surroundings. These blocks are complementary to the adjacent Fulham Wharf development. The taller buildings fronting the river are of a slightly different character and serve to respond well to the form and appearance of the other tall buildings in this environment; the Corten structure and supplementary detail of these blocks is considered to represent a high-quality of design. Further detail of the detailing and materials of all blocks would be subject to conditions.

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

10.21 The impact of the development has been fully considered upon heritage assets as set out in the latter sections of this report. Given that the proposal site is situated in the Sands End conservation area, the proposals have been considered with due regard to the tests of both the NPPF and Planning (Listed Buildings and Conservation Areas) Act 1990. The Sands End conservation area is undergoing significant change as part of the redevelopment of sites within the South Fulham regeneration area and the proposals are considered acceptable in this regard. The proposals are not considered to result in any harm to any heritage assets surrounding the application site. (Again, further detailed assessment of this element is provided later in this report).

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

10.22 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.

10.23 The proposal located adjacent to the river Thames. Proposals have been designed to retain the functional use of Albert and Swedish Wharf, whilst also providing a podium public realm, and access to a stepped river walk, to connect with other adjacent sites in future. The scale of the proposals is not considered to result in a canyon effect along the river and the scale of the tall buildings proposed would complement the scale of other tall buildings addressing this stretch of river frontage. The tallest building would also provide a wayfinding experience to

Wandsworth Bridge.

f. buildings should not cause adverse reflected glare

10.24 The design principles of the scheme include provision of fenestration set into reveals. 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

10.25 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

10.26 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.

10.27 Transport impacts are dealt with by part C2(d) of Policy D9 and it must be demonstrated that subject to appropriate conditions the transport network has capacity to accommodate the development. There are no sound transport objections to the proposal. There are several public transport modes nearby including 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

10.28 The third set of impacts to be assessed under Policy D9 are the environmental impacts of the development. The proposed development is seeking is supported by a sustainability report, energy statement and whole life carbon assessment which ensure that this proposal would meet the highest environmental and sustainability standards.

10.29 A Daylight, Sunlight, and Overshadowing Assessment has been prepared which shows that there would be some 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.

10.30 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.

10.31 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

10.32 Considering the development of a tall building at this location, the principle of development is supported by Local Plan Policy DC3. Given the design, location, and stepped massing; alongside the architectural detailing of the scheme, the current proposals are not considered to have a disruptive or harmful impact on the skyline for the purposes of Policy DC3.

10.33 Furthermore, the scheme is considered to provide a positive addition to the skyline and the surrounding townscape creating a visual marker building, and positive wayfinding experience to Wandsworth Bridge from the surrounding townscape. 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.

10.34 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**

10.35 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.

10.36 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 section 66 and section 72 duties of the Planning (Listed Buildings and Conservation areas) Act 1990 and the requirements set out in the NPPF.

10.37 Section 72 of the Planning (Listed Buildings and Conservation areas) Act 1990 requires that: With respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

10.38 Paragraph 195 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.

10.39 Paragraph 201 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.

- 10.40 Paragraph 203 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.
- 10.41 Paragraph 205 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.
- 10.42 Paragraph 206 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.
- 10.43 Paragraph 207 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.
- 10.44 Paragraph 208 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.
- 10.45 Paragraph 209 of the NPPF states: The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage

asset.

- 10.46 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).
- 10.47 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.
- 10.48 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 208, 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.
- 10.49 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.
- 10.50 The scheme would impact directly on heritage assets. These impacts are considered separately in the following sections.
- 10.51 Impacts are mainly focussed upon the Sands End conservation area. 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.
- 10.52 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 208 and 209 of the NPPF as appropriate.
- 10.53 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.

10.54 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.

## **Townscape Assessment – Views**



10.55 To assess the impact of the proposed development, the application includes a Townscape and Visual Impact Assessment which assesses a series of 17 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, many 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.

10.56 The buildings proposed within the current scheme, vary between 5 storeys along the Townmead Road context, stepping-up to two taller buildings of 13 and 17 storeys to the river frontage. As such, the townscape impacts of the proposal can be summarised to be limited to local/mid-range views of the proposal when views from context of adjacent built form and open spaces, and longer-range views along the river corridor.

#### Northward/river facing Views

10.57 Within northward facing views, the development would largely be visible only in views along the river corridor. With the taller buildings providing a change to this frontage, beyond that of the previous developments, (both consented/implemented) along this stretch of the river. Whilst the change would be significant, the impact of this change would be limited owing to the scale and high-quality of other taller buildings which have been developed throughout this section of the river corridor. In these views, the massing and architecture of the scheme would limit any townscape harm and would also provide a key wayfinding experience to Wandsworth Bridge.

10.58 In other views looking north from London Borough of Wandsworth, (beyond those views on the immediate river frontage), only the crown of the taller buildings would be appreciated in these views.

10.59 The scope of change would be significant, and the impact of change neutral/beneficial.

#### Westward facing Views

10.60 In most of the westward facing views, the visibility of the proposal scheme would be limited. Generally, the development would be visible within localised views along Townmead Road. In these views the main element of the scheme which would be visible, is the 5-storey block fronting Townmead Road itself. The design quality of this block coupled with its respective height and detailing which complements the adjacent Fulham Wharf development would serve to limit any adverse impacts of the development. In some other localised views, where the development is visible, only the crown of the taller buildings would be appreciable as a background feature of views.

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

#### Eastward facing views

10.62 In many eastward facing views of the development the proposal scheme would not be readily visible, apart from localised views along the riverwalk,

(adjacent to Hurlingham Retail Park), Carnwath Road and Wandsworth Bridge Road. These local townscape impacts should be considered alongside the existing consented/implemented developments within the Regeneration Area, and alongside the design quality of the scheme. The consistency in stepped massing of all proposals serves to reduce the townscape impacts of proposals in these views.

10.63 In some other localised views, where the development is visible, only the crown of the taller buildings would be appreciable as a background feature of views; this is particularly the case in some views from Hurlingham Park.

10.64 The scope of change would be moderate/negligible, and the impact of change would be neutral/beneficial.

#### Southward facing views

10.65 Within southward facing views, particularly those from both Stephendale Road and Wandsworth Bridge Road, the development would have additional visibility in a small series of views. The development would introduce prominent features in the background of these views, particularly in the case of the two tall buildings fronting the river. Other blocks of the proposal in the immediate background of these views would have a similar visual impact to the existing Fulham Wharf development. In the case of the taller building, these elements should be considered with due regard to these buildings providing a positive wayfinding experience to Wandsworth Bridge.

10.66 The scope of change would be moderate/significant, and the impact of change neutral/beneficial.

10.67 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, and the impact of these changes would, given the scale of development and the high-quality of design be largely neutral/ beneficial.

#### **Application site – Heritage constraints**

10.68 The application site is situated in the Sands End Conservation area.

#### Sands End Conservation Area

10.69 The Sands End conservation area was designated in 1991. The conservation area was designated because of the importance of protecting the riverside from unsympathetic development and to encourage the preservation and enhancement of the riverside itself, ensuring that new development is of a good and appropriate design.

10.70 Since the time of its designation, the area has also been designated as part of the Fulham Riverside Regeneration Area. As such, the conservation area has been subject of significant development, including the Imperial Wharf development and more closely to the application site, the Fulham Wharf and, (ongoing) Hurlingham Retail Park developments.

10.71 Cumulatively, these developments have established a new character to the Riverfront, bringing forward a more significant scale of development and the

introduction of tall buildings within this setting. This change has been carefully managed to balance and mitigate harm to the conservation area whilst allowing development to proceed which meets the aspirations of the regeneration area designation. Any harm to character and appearance of the Conservation Area, has largely already occurred following implementation of these earlier developments.

#### Assessment of Impact

10.72 In assessing the impact of the proposal scheme upon the character and appearance of the conservation area, officers have given due regard to existing context of the site, and the extent of other major developments implemented or completed recently. The current buildings occupying the site, being of a modern industrial character, make a negligible contribution to the character and significance of the conservation area. The proposal scheme would introduce a development of high-quality design, with façades/detailing which would provide complement the form of other more recent developments in this setting. Furthermore, the tallest buildings occupying the river frontage would provide an animated frontage to the river, which complements on-going development of adjacent sites, and provides a positive wayfinding experience to Wandsworth Bridge. Considering the evolving character of the local area, the development is not considered to result in any harmful impacts to the character or appearance of the Sands End conservation area.

#### **Impacts upon the setting of other heritage assets**

10.73 Given the scale of the proposals, namely the tallest buildings at 13 and 17 storeys respectively, the development would have added intervisibility from the surrounding area, which is covered in more detail in the townscape assessment above. However, from a heritage perspective, there is a need to consider whether the intervisibility of the scheme would result in any harmful impacts to other assets both within Hammersmith and Fulham and beyond in London Borough of Wandsworth.

10.74 Officers have reviewed the Heritage Statement and Townscape and Visual Impact assessment submitted in support of the application and would agree with the outcomes of the applicants' assessments.

10.75 Considering the impact of the development upon the setting of both the Hurlingham and Studdridge Street conservation areas, the degree of visibility from both areas, would be limited overall. In such instances where the development is visible, it would mainly be the crown of the tallest building which would have some visual reference. The only exception to this within views from South Park. Here the scheme would become legible as a background feature of this view and would be observed in a similar, but diminished manner to the existing Barton House development, (20 storeys). Views to the development would be largely screened by the canopy of mature trees within this setting and consequently, the development is not considered to result in any harm to the setting of either conservation area.

10.76 A similar conclusion can be made when considering the impacts upon the

setting conservation areas within London Borough of Wandsworth. In these instances, significant developments along the southern river edge, would generally minimise any intervisibility of the scheme within these areas. Any visibility would largely be in relation to the crown of the taller buildings proposed.

10.77 In considering the impacts upon setting of adjacent statutory and locally listed buildings, again intermittent land uses and recent developments, (both consented and implemented), would mitigate any impact upon the setting of heritage assets. The only exceptions to the this, are as follows:

10.78 Wandsworth Bridge – the development would result in a new taller building in close proximity to the bridge and its approach. Given the limited architectural or structural detailing of the bridge, this is not considered to detract from views of the bridge of its setting, and as discussed above, is considered to provide a positive wayfinding experience to the bridge.

10.79 Putney Railway Bridge – the development would have a degree of visibility from outward views from the bridge, in a similar manner to other consented schemes. This visibility is not considered to detract or result in any harm to the heritage asset overall.

10.80 Fulham Wharf Warehouse, Townmead Road – the northern block of development fronting onto Townmead Road, would result in some visual change to the setting of this asset, however owing to the high-quality of design, following a warehouse aesthetic of this element, this would have a similar impact to the recent development to the eastern extent of the asset, (Fulham Wharf), and it is not considered to result in any detrimental or harmful impacts overall.

10.81 The development is not considered to result in any harm to the Sands End conservation area or the setting of other designated/non-designated heritage assets within the local area., having regard to and applying the statutory provisions in Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

#### Design, Heritage, and Townscape Conclusion

10.82 The proposal scheme represents an opportunity to optimise development of key regeneration site in accordance with the London Plan and Council's Local Plan policies.

#### 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 frameworks of both of these policies.
- The proposed scale and massing of the proposal would not result in any

harm to the Sands End conservation area. Furthermore, it is not considered that proposals would result in any harm to result in any harm to the setting or significance of any other 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, Thames Riverside and reinforcing the legibility and identity of the South Fulham Riverside Regeneration Area. and the wider locality.
- The proposals would provide a new public space at podium level which would be animated by new active uses. This space would, given the need to retain the functional wharf use at this location be accessed by a stepped/lift access to a new section of river walk, which would enable and allow for future connectivity and permeability to other elements of the river walk delivered/identified in this area.

10.83 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 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.

10.84 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). Further discussion of the public benefits of the scheme, are referenced in in the conclusion of this report.

## **11.0 HIGHWAYS AND TRANSPORT**

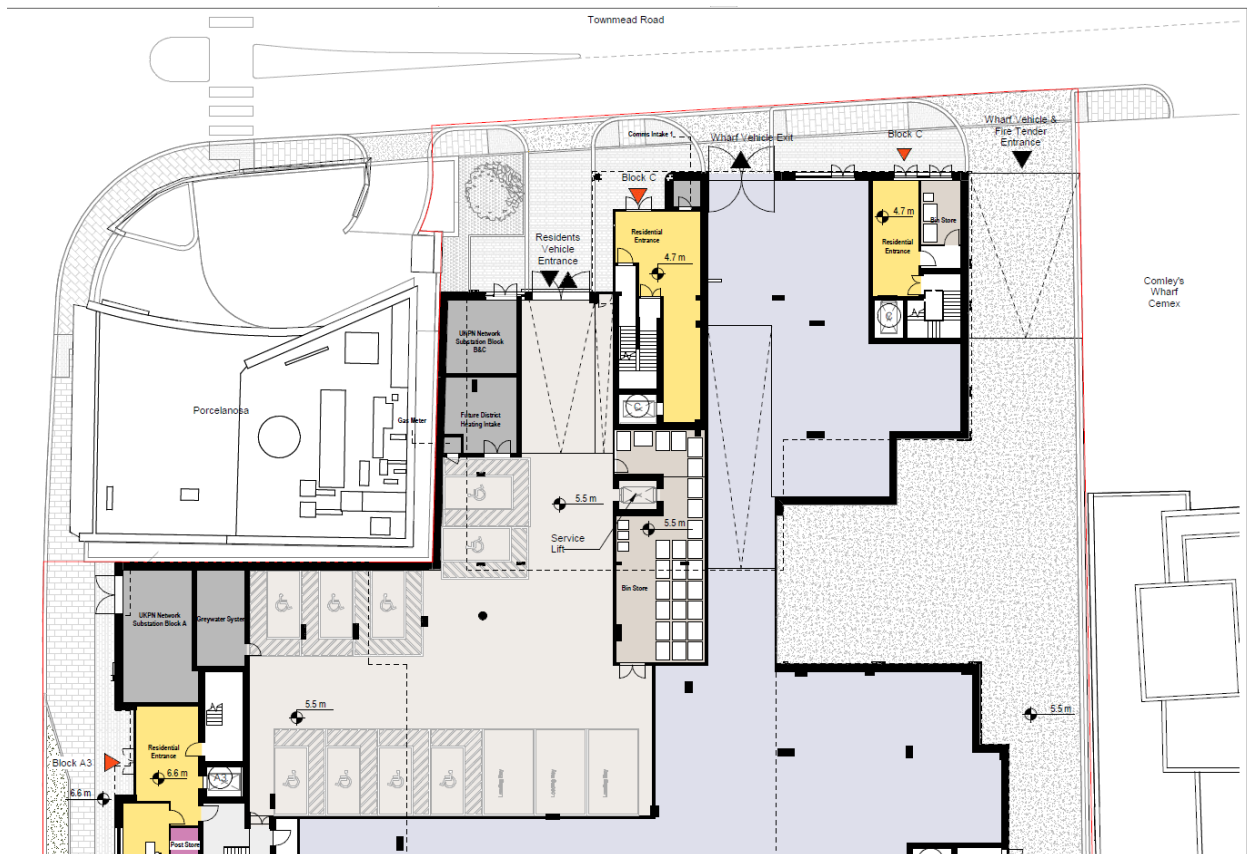
11.1 The NPPF requires that developments which generate significant movement are located where the need to travel would be minimised, and the use of sustainable transport modes can be maximised; and that development should protect and exploit opportunities for the use of sustainable transport modes for 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.

11.2 In determining this application, consideration has been given to the requirements of Policies 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.

- 11.3 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.
- 11.4 Local Plan Policies T2, T3, T4, T5, T6 and T7 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.
- 11.5 The application site is bound by Wandsworth Bridge Road (A219) to the west, the River Thames to the south and is accessed directly from Townmead Road. The site is near the junction of Wandsworth Bridge Road, Carnwarth Road and Townmead Road. The site achieves a public transport accessibility level score of PTAL 3/4 which is good. The proposed development would include 276 residential units, commercial floorspace with 9 car parking spaces for blue badge holders, 3 servicing bays, associated cycle parking and waste storage.
- 11.6 The following transport reports have been submitted in relation to this application:
- Transport Assessment
  - Residential Travel Plan
  - Residential Site Management Parking Plan
  - Delivery and Servicing Plan
  - Outline Construction Logistics Plan

### **Access, circulation and highways safety**

- 11.7 The wharf is currently accessed from a dedicated entrance on Townmead Road, this shall be retained. The residential part of the proposal will be accessed from both Townmead Road and Wandsworth Bridge Road (pedestrian and cycle Access only).
- 11.8 There will be a new (additional) residential vehicle access from Townmead Road to access nine (9) disabled car parking spaces and three (3) servicing bays, adjacent to the existing access to the wharf. This will require a new vehicle crossover to be delivered via s278 agreement.



**Image 18: Communal access points**

11.9 A communal residential entrance for Block C would be located between these two vehicle entrances and would serve pedestrians and cyclists. The other communal entrances for residents arriving by foot or bike are located on Wandsworth Bridge Road. The Block C communal core entrance is in close proximity to the safeguarded wharf vehicle entrance / exit, although it has been set back to mitigate potential safety concerns.

11.10 There will also be pedestrian access points from residential blocks B1 and B2 on the east of the site from the podium courtyard. Access to the courtyard would from any of the residential entrance cores to street level, as well as from the Thames Path. The site will have a split podium with an upper and lower courtyard. Access to the Thames Path would be open 24/7, and public access in perpetuity will be secure through a S106 obligation.

11.11 Given the close relationship between Block C and the safeguarded wharf, the proposed highways works on Townmead Road will be designed with features to minimise potential conflict between vulnerable road users / active modes and Heavy Goods Vehicles (HGVs) and other vehicles. The highways works will be delivered via a s278 agreement.

11.12 The safeguarded wharf is currently accessed from a vehicle dedicated entrance on Townmead Road, which would be retained in the proposed scheme. A separate new vehicle entrance on Townmead Road would be provided to the west of the existing site access which would serve the residential element of the scheme, providing access to the nine disabled car parking spaces and three loading bays. This new residential vehicle access will require a new vehicle

crossover to be delivered via a s278 agreement with the Council.

- 11.13 All highway works will be subject to a Stage 1 Road Safety Audit including relevant vehicle tracking, to ensure the designs are fit for purpose prior to implementation.
- 11.14 Arrangements on Townmead Road for taxis and short stay servicing will be balanced against the need to reduce vehicle dominance and prioritise the safety of vulnerable road users. These details will be secured by s106 obligations/ conditions.

### **Active Travel Zone, Healthy Streets and Vision Zero**

- 11.15 An Active Travel Zone (ATZ) report has been submitted with the application it assessed walking and cycling routes in the vicinity of the application site and the scope was informed by Transport for London and LBHF.
- 11.16 The introduction of high-density residential development on top of a reactivated safeguarded wharf will give rise to an increase in pedestrian and cycle demand and HGV movements.
- 11.17 The Active Travel Zone (ATZ) assessment identified areas for improvement. LBHF have secured appropriate highways works obligations in the S106 to address these issues and deliver Healthy Streets measures in line with London Plan Policy T2.
- 11.18 It is notable that the adjacent junction at Townmead Road, Wandsworth Bridge Road and Carnwath Road does not have any formal crossing facilities for pedestrians or cyclists. The Council's Public Realm Team are developing a scheme to improve the junction for cyclist and pedestrians; the proposed junction improvement scheme would remove the community severance and improve connectivity and safety for pedestrians and cyclists. To mitigate the development impacts, in line with TfL and LBHF Highway objectives, the applicant has agreed to an obligation to secure the development and implementation of the proposed pedestrian and cycling improvements at this junction. This will be secured by a s106 in accordance with London Plan Policies T2 and T4.
- 11.19 In addition to the above, the ATZ assessment identifies several areas for pedestrian improvement. To this end, the building line would be set back on both the Wandsworth Bridge Road and Townmead Road elevations to provide a wider footway, which is welcomed. The proposed development will also provide a missing section of the Thames Path elevated above the safeguarded wharf and accessible from Wandsworth Bridge Road. Public access and maintenance arrangements would be secured in perpetuity as part of any permission.

### **Car parking**

- 11.20 The site has a PTAL rating of 3/4. In accordance with London Plan policy T6, the proposal will not provide any new private car parking spaces on the development site except for 9 disabled parking spaces. The proposed parking is located on the ground floor and is accessible via a vehicular crossover from Townmead Road. The car park area will also be used for servicing with 3 loading bays and a turning



head for waste collection vehicles.

- 11.21 All car parking spaces (100%) will be equipped with active electric vehicle charging points located on the transfer zones. The details will be secured by planning condition.
- 11.22 A permit-free agreement will be secured which will prevent all occupiers (other than blue badge holders) from obtaining a permit to park on-street
- 11.23 The management of the 9 disabled parking spaces will be the responsibility of the Site Management Team (SMT), who will be tasked with:
- Allocation of the spaces;
  - Monitoring the usage of spaces;
  - Security and enforcement (including the enforcement of informal car parking in the public realm)
- Further details of the car parking management will be secured through a planning obligation.
- 11.24 The proposed development provides 3.6% blue badge holder parking at ground floor within the site in a shared car park area, this is in accordance with the London Plan (2021), which requires a disabled parking provision of 3% of the total residential units from the outset.
- 11.25 The eastern side of Wandsworth Bridge Road, including Townmead Road, forms part of LBHF's Controlled Parking Controlled Parking Zone (CPZ) 'Z' which controls parking between the hours of 09:00-17:00 Monday to Saturday. Similarly, the western side of Wandsworth Bridge Road including Carnwath Road, is located within the LBHF CPZ 'Q' which controls parking between the hours of 09:00-17:00 Monday to Saturday.
- 11.26 A parking beat survey was undertaken on Wednesday 22nd, Thursday 23rd and Sunday 26th June 2022 with overnight beats taken at 05:00 on all dates i.e. when resident parking is expected to be at its highest. The survey area includes a 200m walking distance around the Site covering Carnwath Road, Dymock Street, Breer Street and De Morgan Road.
- 11.27 The survey identified that at 05:00 on Wednesday there were 135 vehicles parked and 33 spaces available (80.4% occupancy), at 05:00 on Thursday there were 137 vehicles parked and 31 spaces (81.5%) and at 05:00 on Sunday there were 129 vehicles parked and 39 spaces. The surveys suggest that the surrounding road network is below the 90% utilisation level where parking stress is usually expected to start to occur. To minimise the impact of the development a S106 contribution has been secured towards a review of the times of the CPZs in the vicinity of the site.
- 11.28 Car club membership for use by future residents will be secured through a S106 obligation, car clubs provide an alternative to car ownership for those that require occasional car use.

## **Cycling**

- 11.29 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.

11.30 The quantity of cycle parking accords with London Plan Policy T5, comprising 509 long-stay cycle parking spaces and 16 short-stay spaces. A further 16 spaces are located within the public realm areas to serve the non-residential units. Plans demonstrating compliance with the London Cycle Design standards should be provided with details of cycle parking secured by condition. Further details of the facilities for ebikes and cargo bikes will also be secured by condition.

### **Travel Plan**

11.31 A framework Travel Plan was submitted with the application. The final Travel Plan and all agreed measures would be secured by s106, a monitoring fee for the commercial and residential elements of the development would also be secured by obligation.

11.32 The Travel Plan should incorporate, site wide measures such as:

- Consideration of how taxi arrivals are managed within the site.
- Consideration as to how powered two wheelers will be incorporated and managed within the site
- Location of notice boards around the site and ensuring updated information is provided on a regular basis.
- Details including costs for appointing a Travel Plan Coordinator over the lifespan of the Travel Plan to ensure all measures set out in the action plan are delivered.
- A series of specific measures connected to the development 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
- Subsidised options for employees to obtain an Oyster card/or similar measures.

11.33 A significant number of local amenities and services are within walking distance which are likely to be used by residents. In addition, several public transport nodes are available within convenient walking distance of the Site; including bus, underground and rail services.

11.34 The Site is well served by public transport, with convenient access to London Underground, London rail networks and bus services. There are numerous regular bus services that operate in the vicinity of the Site, with the closest bus stops being located approximately 100-190m north of the Site along Townmead Road. The nearest station being Wandsworth Town Rail Station (800m / 10-minute walk) which offers National Rail services of the Proposed Development. Parsons Green Underground Station is located approximately 1,600m / 19-minute walk from the Site. Chelsea Harbour Pier is located 1.2km (15 minute walk) to the east of the Site and provides access to the London River Bus

service. The pier can be reached via the off-road route via Imperial Park and provides access to river bus route: RB6

### **Trip generation and impacts**

11.35 The Proposed Development including both the residential, commercial units and wharf will result in 238 two-way trips in the AM peak and 205 two-way trips in the PM peak, of which the majority will be undertaken by public transport, walking and cycling. This is an increase in person trips when compared to both the existing operation of the site as a wharf and seasonal bar.

11.36 The change in absolute vehicle trips is considered negligible with circa 3 additional HGV (18t tipper trucks) arriving and departing in the AM peak, and no change in the PM peak, when compared with the existing operations. The removal of the existing seasonal bar will also result in a reduction in trips during the evening period as well as the number of taxis stopping in the locality.

11.37 When compared with the consented scheme, the Proposed Development will result in a minor decrease in the number of vehicle trips with the removal of all general parking from the site with a negligible change in the number of consented delivery trips. The increase in person trips relates mainly to residents and staff (wharf) utilising Underground, rail and bus services in the locality.

11.38 The expected number of servicing vehicle movements to and from the Development will be:

- 12 daily deliveries per 100 residential units
- 1.35 daily deliveries per 100 sqm of retail

On this basis, the forecast daily servicing and delivery vehicle trips is 72 per day.

11.39 Based on survey data analysed from the Consented Scheme's TA (ref: 2014/03250/FUL) and new survey undertaken on Wednesday 29th June 2022; 4,723 HGVs annually, or 18 HGVs in and out per day, would be generated by the safeguarded wharf use.

11.40 The PLA consider that a similar cap of 18-20 HGVS per day and limitation on vehicle activity at Swedish Wharf would be contrary to the safeguarded wharf status and present a significant barrier to the long-term operation and viability of the wharf by restricting the ability to maximise the use of the water for handling goods and materials. The Safeguarded Wharves Review (2019) and London Plan (2021) considers that restricting or removing wharf operations will inevitably lead to an increase in road traffic and water freight elsewhere on the transport network.

11.41 A cap on vehicle movements at the Wharf hasn't been sought. However, a Wharf Operational Management Plan will be secured to mitigate the negative impacts of HGV movements on the surrounding environment, and will include limits on HGV movements in peak hours and sensitive times such as school pick-up and drop-off times; noise reduction measures, and ensuring HGV movements are continuously managed (e.g. marshalling), for the lifetime of the development.

## Delivery and Servicing

- 11.42 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.
- 11.43 The servicing strategy for the Development will be undertaken at separate locations for the residential / café/restaurant use, and the safeguarded wharf land uses:
- Residential + cafe/restaurant – delivery vehicles and waste collection vehicles will use the turning head facility and 3 x loading spaces within the shared car park to wait, load and unload. The shared car park can be accessed by a dedicated vehicle crossover on Townmead Road.
  - Safeguarded Wharf – delivery vehicles and waste collection vehicles to the safeguarded wharf will make use of the loading facilities included within the demise of the wharf itself accessed via a dedicated vehicle crossover on Townmead Road.
- 11.44 The proposed turning head within the Site has been designed with sufficient space for the largest vehicle to turn. The on-site servicing solution has been designed to accommodate the anticipated number of servicing vehicles and the largest anticipated vehicles, up to and including LBHF waste collection vehicles. Wayfinding signage and markings will be provided to clearly direct drivers to the loading bays.
- 11.45 Vehicle swept path analysis was undertaken to demonstrate the suitability of the loading facilities and demonstrate that delivery and servicing vehicles can enter and exit the Development in forward gear without restricting access to other vehicles attending the Development.
- 11.46 All delivery and servicing for the Development will take place on-site. All vehicles must access the Site via the two separate vehicle crossovers on Townmead Road. Parking and Loading is not permitted on Townmead Road due to the double yellow line and single line blips on both sides of the carriageway. Similarly, there is no opportunity to stop on Wandsworth Bridge Road due the presence of double yellow lines and double yellow blips.
- 11.47 Residential deliveries can vary significantly but are generally focused on online shopping deliveries including food shopping, undertaken by transit vans. Residents are likely to purchase bulky items such as furniture or appliances on infrequent occasions, which require 7.5t box vans. A concierge and post room will be located within Block C for the coordination of all post, packages and general deliveries to the residential units.
- 11.48 Deliveries to the café/restaurant will primarily be by bicycle, motorcycle and small vehicles on account of the type of goods typically delivered, such as couriered documents, postal mail and stationery. Where larger vehicles are required, it is envisaged these will comprise transit and panel vans, with occasional use by box vans. Deliveries of perishable goods will likely be made by refrigerated vans.

- 11.49 Waste will be moved from each of the individual stores to the car park by the SMT shortly before collection each day and returned to the stores immediately after. Waste will be managed by private collection for the commercial elements while the residential waste collection will fall in line with the Council's collection regime. The strategy has been developed to ensure that a waste collection vehicle can arrive within 10m of where waste will be presented in the service yard whilst ensuring waste is always stored away from the public highway.
- 11.50 The Delivery and Servicing Plan for the residential and ancillary commercial space, and a Wharf Operational Management Plan, will be secured by condition/obligation in line with London Plan Policies T2, T3 and T7. The vehicle access to the Safeguarded Wharf has been divided into segregated vehicle access for entry and exit to improve circulation.

### **Construction Logistics**

- 11.51 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.
- 11.52 The applicant has submitted a Draft Construction Logistics Plan that outlines the estimated construction vehicle movements associated with the proposed development. 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, cumulative impacts, health and safety and community liaison meetings.
- 11.53 The approval of a final CMP/CLP together with a DMP/DLP for the demolition works ahead of the commencement of the development will be secured by obligations, 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 the vehicle routing and how workers will travel to and from the site.
- 11.54 A final CLP would 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. Details on restricted construction vehicle hours of access in conjunction with an agreed limit on the number of construction vehicles to a maximum per hour. The final CLP will also need to include details relating to the impact and protection of vulnerable road users on Townmead Road.
- 11.55 The CLP will include a communication strategy that includes a commitment to hold regular Community Liaison Meetings with local residents and businesses.
- 11.56 The CLP will need 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

DLP/CLP would be secured within the S106 Agreement.

## **Overall Summary**

11.57 On balance, subject to the inclusion of the suggested conditions and obligations, the effects on the local highway network along with the proposed car parking, cycling parking and servicing of the Development is considered acceptable having regard to the NPPF, Policies T1, T2, T4, T5, T6, T6.1, T6.5 and T7 of the London Plan, as well as the Local Plan Policies T2, T3, T4, T5, T6 and T7.

## **12.0 ENVIRONMENTAL CONSIDERATIONS**

### **Flood Risk and Drainage**

- 12.1 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. The NPPF seeks to guide development to areas of low flood risk, ideally to Flood Zone 1. Where there are no reasonably available sites in Flood Zone 1, then sites in Flood Zones 2 and 3 would be considered.
- 12.2 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. London Plan Policy SI 12 requires development proposals to ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible, in line with the drainage hierarchy. Policy SI 5 (Water infrastructure) states that development proposals should minimise the use of mains water; incorporate measures to help achieve lower water consumption; ensure that adequate wastewater infrastructure capacity is provided; and minimise the potential for misconnections between foul and surface water.
- 12.3 Local Plan Policy CC2 requires major developments to implement sustainable design and construction measures, including making the most efficient use of water. 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. Policy CC3 requires development proposals within Flood Zones 2 and 3 to provide a Flood Risk Assessment and requires that all developments that include a subterranean element must provide details of the structural waterproofing measures to be integrated to prevent any increase in on or off-site groundwater flood risk. Consideration is also required with regards to the conservation of water resources through water efficiency measures.
- 12.4 The site lies within Flood Zone 3 which indicates a high risk to flooding from the River Thames. However, the site is well defended from this form of flood risk by the Thames Barrier and also the local river wall defences.
- 12.5 The site proposals include a large number of new residential units which means that the risk to flooding on the site will be more vulnerable. An Exception Test

has been carried out for this and is considered to be acceptable in principle to develop the site in this respect, subject to the FRA being acceptable.

- 12.6 The FRA notes that the current level of the river walls in this part of the borough are above the current statutory minimum requirement of 5.41m AOD as they stand at 5.98m AOD (Swedish Wharf) and 6.10m AOD at Albert Wharf. These are close to the required height of 6.35m AOD by 2100 to provide continued protection. In line with the EA requirements, the river wall defence along the boundary of the site will be replaced with a confirmed height of 6.35m AOD.
- 12.7 There are areas in the site adjacent to Wandsworth Bridge Road which have a high risk of surface water flooding. Flood risk management measures are included as part of the proposed design by ensuring that all residential uses (other than entrances and lobbies) are raised to first floor level and above.
- 12.8 A 50m long marine deck/ jetty is proposed for barges to use when berthing at Swedish Wharf. With regards to this new structure in the river it is stated that: The marine deck is not expected to cause any significant impact on river conveyance, due to the limited footprint of the piles and large section of the River Thames in the area, although part of the structure might be partially submerged during extreme high tide. The top of the deck is at least 5.41m AOD and therefore the marine deck would sit above current extreme water level. The PLA has worked with the applicant to secure an acceptable jetty design and raise no objections subject to appropriate conditions.
- 12.9 A basement level is proposed for the new development for plant and equipment only. Sewer flood risk at this level is likely to be low due to this intended use. Groundwater is present in this location and the FRA confirms that waterproofing of the basement will be provided and these details will be secured by condition.
- 12.10 Most of the ground floor will continue in use as the safeguarded wharf uses although there will be some other uses such as bin storage and car parking. Ground floor levels are set at different levels on different parts of the site. The ground floor finished floor level will be 5.5 AOD for most of the building, with a ramp access down to street level at Townmead Road, which is at a lower level (4.7 AOD). The internal floor finishes are set at 5.5m AOD which would provide some protection from being impacted by flood water in the event of a breach of the river wall defences. Safe routes to the first floor will be available if there was ever a need to evacuate the ground floor levels due to flooding.
- 12.11 The communal residential entrances on Wandsworth Bridge Road are higher at 6.6 AOD. The residential podium and lowest floor within the scheme would be between 10 and 7 metres above the finished ground floor level.
- 12.12 No residential use is proposed at basement/ground floor levels other than main entrance/lobby uses and all new residential uses are at 2nd floor and above. The new flats are therefore not at risk from flooding.
- 12.13 The FRA notes that a Flood warning and Evacuation Plan will be produced before the site is occupied. The use of raised finished podium floor levels and submission of a Flood Evacuation Plan would be conditioned.

## **Sustainable Urban Drainage (SUDs)**

- 12.14 A range of Sustainable Urban Drainage (SUDs) measures are proposed. The site has been divided into for the purposes of managing surface water a southern catchment covering the majority of the site (7,320m<sup>2</sup>) which is proposed to discharge to the River Thames unrestricted. A small area to the north of the site (230m<sup>2</sup>) is proposed to drain to an attenuation tank (8m<sup>3</sup>) to store run-off for controlled discharge to the Townmead Road combined sewer.
- 12.15 This includes green roofs, rain gardens, permeable paving areas, with attenuation capacity provided via storage tanks below the safeguarded wharf. This has been designed to accommodate a 1 in 100-year storm event, allowing for 40% increase due to climate change. The nature of the schemes design means that full infiltration would not be appropriate given that the main courtyard area where the new landscaping is proposed sits at podium level above wharf box at lower levels to enable safeguarded uses. However, surface level landscape features may be suitable to help manage run-off for some storms and the use of such measures will be secured by conditions.
- 12.16 Thames Water raise no objection to the proposal subject to conditions/informatives. The Environment Agency have commented and raise no objections to the proposal. Subject to appropriate conditions to secure additional information, taking into account the development constraints in this particular instance the drainage strategy is considered acceptable.
- 12.17 Subject to appropriate drainage strategy and flood risk management approach being secured by condition, the scheme complies with the and is in accordance with London Plan Policy SI12 and SI13 and Local Plan Policy CC2 and CC3.

## **Energy and Sustainability**

- 12.18 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.
- 12.19 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 net 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 net 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.
- 12.20 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.
- 12.21 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.
- 12.22 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.
- 12.23 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.

### **Energy strategy**

- 12.24 An Energy Strategy has been provided with the application. The Energy Statement (including overheating analysis), Sustainability Statement and Whole Lifecycle Carbon Report have been prepared in consultation with officers at LBHF and the GLA.
- 12.25 The Energy Statement is based on the London Plan energy hierarchy of 'Be Lean, BeClean, Be Green'. Through a combination of 'Be Lean' mechanisms, the following range of energy efficiency measures have been included: natural daylight and solar gain, improved thermal insulation levels, energy efficient lighting, heat recovery on the ventilation system, energy efficient space heating and hot water systems, shading will also be provided where required to help with over-heating. An Air Source Heat Pump (ASHP) energy system is also proposed as are PV panels on the roof,
- 12.26 The Energy Statement sets out that there are no district heat networks (DHN) in the vicinity. Where it is not possible to connect to a DHN, the scheme should be designed to enable the future potential to a DHN should one come forward at a future date.
- 12.27 Active cooling is proposed in the form of a mechanical ventilation and heat recovery system. This is not normally encouraged but given the need to ensure that the noise mitigation strategy can be achieved during summer months, whilst

also avoiding overheating, this is on balance acceptable in this particular instance, noting the noise levels and noise generating uses within and surrounding the scheme.

- 12.28 A roof layout has been provided demonstrating that for some roof areas, the roof's potential for a photovoltaic (PV) installation has been maximised, taking into account the shading caused by the two towers and the location of ASHPs and other heating plant rooms and roof top level amenity space. Where solar panels are proposed (Blocks B2 and A3) they would be integrated with green / biodiverse roofs.
- 12.29 London Plan Policy SI2 requires the energy performance of completed developments to be monitored, verified and reported following construction ('Be Seen'). This would be secured through the S106 legal agreement.

### **Sustainability**

- 12.30 The submitted Sustainability Statement sets out the proposed sustainability strategy for the Site, focusing on how the current design seek to meet the principles established in the Mayor's Sustainable Design and Construction SPG (April 2014). The statement summarises the development's sustainability credentials for a wide range of environmental aspects. These include:
- The development comprises previously developed land;
  - Energy efficient design;
  - The communal energy efficient ASHP system;
  - Renewable energy in the form of PVs on the roof;
  - Water efficiency and smart metering;
  - Material efficiency and low environmental impact;
  - Nature conservation and biodiversity;
  - Tackling increased temperatures;
  - Flooding;
  - Air and noise pollution;
  - Light pollution; and
  - Promotion of sustainable transport.
- 12.31 The proposed sustainability strategy is the result a collaborative process at early stages in the project to ensure sustainability principles are central to the design of the development. The topic areas outlined above, overlap with and are addressed in other sections of this report. The submitted document has been reviewed by the Council's Environmental Quality Team and they raise no objections.

### Whole Life-cycle Carbon

- 12.32 Whole Life-Cycle Carbon (WLC) emissions are the carbon emissions resulting from the construction and the use of a building over its entire life including its demolition and disposal. The GLA This guidance explains how to prepare a WLC assessment in line with Policy SI 2 F of the London Plan 2021 using the WLC assessment template in order to capture a development's carbon impact.
- 12.33 A Whole Life-cycle Carbon Assessment has been undertaken for this development. This reviews the embodied carbon emissions associated with the

proposed development, taking into account 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.

- 12.34 The proposed development meets the GLA benchmark but not the more stringent aspirational target. The main source of embodied carbon emissions are associated with the steel and concrete required for the main structures. There are some options under consideration to further reduce emissions which will be explored further at detailed design stage and would be secured by a pre-commencement condition and a post-construction monitoring report would also be secured by condition.

### Circular Economy

- 12.35 A Circular Economy Statement has been submitted 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. A condition would be attached to secure a post-construction report which would provide further details for each phase. This complies with London Plan Policy SI7.
- 12.36 Overall, the residential element meets the required energy efficiency targets of reducing emissions by 10% through energy efficiency measures as it achieves 18%.
- 12.37 The minimum overall reduction in CO2 emissions of 35% is also met as the design of the residential units reduces emissions by 78%. This also meets the more stringent GLA benchmark target of 50% for major residential schemes.
- 12.38 The non-residential element of the scheme does not meet the minimum targets - achieving 8% CO2 reduction via energy efficiency measures (compared to a target of 15%) and achieving a 13% reduction in CO2 emissions overall. It is acknowledged that recent changes in the Building Regulations make it more difficult for non-residential schemes to meet the London Plan targets even if measures such as energy efficiency and renewable energy generation have been maximised. This is due to the targets being set with reference to the 2013 Building Regulations which have since been updated in 2021, raising the baseline that the energy efficiency and total carbon reduction percentage improvements are measured against. The revised targets came into effect in January 2023, and making it harder to achieve the targets against the more stringent Building Regulation requirements. The GLA acknowledge that achievement of the London Plan targets has become more challenging because of these changes as the CO2 baseline assessment for non-residential developments now includes low carbon heating as standard (whereas this is not the case for residential schemes). This has the effect of reducing the CO2 reduction figures for non-residential developments relative to the baseline. However, applicants are still be expected to follow the energy hierarchy to

maximise carbon savings before offsetting is considered, which has been done in this case.

<b>CO2 reduction measures</b>	<b>Residential use</b>	<b>Non-Residential use</b>
<b>GLA Energy Efficiency - CO2 reduction target</b>	10%	15%
<b>Albert &amp; Swedish Energy Efficiency Achieved</b>	18%	8%
<b>GLA Minimum CO2 reduction target - achieved via all on-site measures (incl. renewables)</b>	35% 50% (additional GLA benchmark target)	35%
<b>Albert &amp; Swedish Energy Assessment Achieved</b>	78%	13%
<b>CO2 emissions to be offset to achieve net zero carbon</b>	22%	87%
<b>Overall CO2 target to be achieved</b>	Net zero	Net zero

Table 9: Summary of Albert and Swedish Wharf CO2 reduction performance against London Plan targets

12.39 The original submissions resulted in an estimated carbon offset payments of £329,598. The applicants have worked collaboratively with officers to revise the design to achieve some additional CO2 reductions through on-site measures, particularly for the residential element of the scheme. As a result, the estimated payment in lieu has fallen some 40% to £203,743 (which includes £165,133 for the residential element and £38,610 for non-residential) to achieve the zero-carbon target for this scheme. This approach is welcomed as London Plan and Local Plan policies prioritise inclusion of on-site measures over use of the offset payment route although policy terms it is acceptable under both adopted plans to use offset payments as part of the approach to achieving net zero carbon overall. This offset payment will be secured as part of the s106 Agreement.

#### Digital connectivity

12.40 Policy SI6 requires development proposals to ensure sufficient digital connectivity, including full fibre connections and mobile connectivity, and provide space for mobile digital connectivity infrastructure. Development proposals should ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users. This should be secured by condition.

#### **Other Environmental Impacts**

## Air Quality

- 12.41 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.
- 12.42 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.
- 12.43 An Air Quality Assessment has been submitted with the application, EIA Volume 1 Chapter 7-Air Quality (Ref. APS\_P1166A\_A1-2) dated November 2021. The proposals have been considered by the LBHFs Air Quality Officer.
- 12.44 The site is in an area of existing poor air quality that exceeds the councils 2030 Annual Mean Air Quality Targets for Nitrogen Dioxide and Particulates (PM2.5, PM10). The development is located within the Council's Air Quality Management Area (AQMA) and within the GLA Air Quality Focus Area 61.
- 12.45 In terms of dust risk the site requires mitigation and conditions be attached to secure this during the demolition and construction phases of the development.
- 12.46 GLA The Local Plan also confirms that the whole of LBHF is an Air Quality Management Area for Nitrogen Dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>). The modelling of NO<sub>2</sub> levels in the vicinity identifies that the objective levels would be exceeded on Wandsworth Bridge Road. However, it is understood that this is not directly attributable to the proposed safeguarded wharf operations and HGV traffic but is expected in the baseline scenario and associated with traffic levels in the area. Mechanical ventilation is proposed throughout the scheme to ensure there is no exposure to poor air quality for residents within the scheme.
- 12.47 The applicant's Air Quality Assessment conclude that the Proposed Development is not likely to result in any significant air quality effects and that the air quality for future residents would be acceptable. The development is not expected to give rise to any significant impacts in terms of air quality, subject to appropriate conditions being included to mitigate potential temporary impacts during the construction phase. The energy strategy for the scheme is based on a renewable / low carbon and Zero local emission Air Source Heat Pump solution. The scheme is also car free, excluding the required minimum quantum of disabled car parking. The application therefore meets the air quality building emissions neutral criteria. This is acceptable and complies with the London Plan Policy SI1.
- 12.48 The Council's Air Quality Officer) reviewed the submitted ES and raised no objections, subject to conditions. Therefore, several conditions are recommended for various air quality control measures in relation to both construction and operational phases of the proposal 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**

- 12.49 London Plan Policy SD1 encourages the strategic remediation of contaminated land. 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.
- 12.50 The applicants' submissions include Phase 1 Desk Study Report by WSP, dated September 2021 and additional reports relating to contamination.
- 12.51 No objection is raised by the Council's Contaminated Land officers to the proposed development or land uses subject to the full set of contaminated land conditions and informatives being attached 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 Page 209 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**

- 12.52 London Plan Policy D14 (Noise) sets out measures to reduce, manage and mitigate noise to improve health and quality of life. 12.49 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'.
- 12.53 A Noise and Vibration assessment is included in Chapter X of the Environmental Statement Volume 1: Main Report.
- 12.54 There are a number of noise generating activities and uses in close proximity of the site, including Wandsworth Bridge Road and Townmead Road and the adjacent safeguarded Comley's Wharf. The proposed reactivated wharf use and freight handling use also has the potential to generate noise impacts. The applicant's noise and vibration assessment states that the proposed residential homes could be provided with acceptable internal noise levels, in accordance with the relevant British Standards for daytime and night time noise. This would require appropriate mitigation measures in the form of acoustic glazing, winter gardens on some facades and levels within the scheme, including the implementation of the proposed enclosed concrete wharf box design. All apartments will be mechanically ventilated, so that they do not rely on openings in the facade to provide minimum amounts of ventilation required during the

summer to address the risk of overheating.

- 12.55 Acoustic design principles have been incorporated in the design and layout of the scheme, with the blocks arranged to shelter the internal courtyard space from the noise associated with the adjacent roads and safeguarded wharf and by raising the level of the podium and residential homes on the site, so that it is situated between 10 and 20 metres above the level of the industrial / wharf uses. The noise levels within the northern courtyard would comply with the British Standard. However, the majority of the southern courtyard would not comply, given its more open nature. This is acceptable and the proposed mitigation measures should be secured, in line with London Plan Policy D14.
- 12.56 The Council's Environmental Protection team have considered the proposals and raise no objections subject to conditions regarding sound insulation, plant machinery and construction and servicing management plans. Subject to these conditions the proposals would accord with London Plan Policy D14 and Policies CC11 and CC13 of the Local Plan.

### **Light Pollution/ Solar Glare**

- 12.57 Local Plan Policy CC12 (Light Pollution) seeks to control the adverse impacts of lighting arrangements including that from signage and other sources of illumination.
- 12.59 Details relating to Exterior Lighting in the Design and Access Statement and light spillage are included with the application.
- 12.60 Conditions 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' and that lights of the commercial building are controlled and switched off when not in use. As such officers consider that the proposal accords with the requirements of Policies CC12 of the Local Plan 2018.

### **Archaeology**

- 12.61 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.
- 12.62 The application site lies in an area of archaeological interest. The applicant submitted a desk-based historic environment assessment with the ES. This concludes there is potential for the proposed development to impact upon significant buried heritage assets of archaeological interest within the site. This includes a high potential for paleo-environmental remains, prehistoric marsh and riverfront activity, late medieval field boundaries and post-medieval truncated

remains of 19th century and 20th century buildings.

- 12.63 Historic England's, Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to the borough and were consulted. GLAAS considers that the proposed development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. A condition would be attached to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. Subject to this condition the proposals accord with the NPPF, Policy HC1 of the London Plan 2021 and Policy DC8 of the Local Plan 2018.

### **Arboriculture, Ecology and Biodiversity**

- 12.64 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.
- 12.65 Policy G1 of the London Plan states that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network. 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 Plan 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.
- 12.66 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. 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.

### A Preliminary Ecological Appraisal

- 12.67 A range of urban greening measures are proposed. In accordance with EA requirements the development has been set back from flood defences to ensure



ecological enhancements to the river wall. The detailed design of the new river wall and proposed jetty will where feasible, implement, ecological enhancement measures into the river wall such as vertipools which are artificial rock pools designed to create new wildlife habitat, delivering net gains for biodiversity. Further consideration will also be given to the potential to incorporate new floating reedbed habitats (subject to navigational requirements); increased mud flat habitat and/or additional planters. This is secured by condition.

- 12.68 The proposals include soft landscaping and tree planting within the upper and lower courtyards, biodiverse roof gardens and dense buffer landscaping alongside podium boundary with Comley's Wharf. A range of small, medium and large trees would be provided within the courtyard, which would be incorporated with generous underplanting, amenity lawns, informal play areas and permeable hard surfaces. The submitted ES Volume 3, Appendix Ecology – Annex 2 (BNG) states that native tree and hedgerow species will be planted. The Council's Ecology Officer has reviewed the proposed planting schedule and supports a variety of native planting across the development to increase benefit to wildlife and these details will be secured by condition.



Image 18: Landscaping Master Plan

- 12.69 This overall approach to urban greening is welcomed and would provide substantial net gains in terms of urban greening and biodiversity compared to the existing situation. This approach is in line with the London Plan. The applicant has undertaken an urban greening factor (UGF) assessment which shows that the site would achieve a UGF score of 0.46. This exceeds the 0.4 UGF benchmark set by the London Plan.
- 12.70 Subject to the inclusion of conditions officers consider that the proposed development accords with Policies G1, 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**

- 12.71 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.
- 12.72 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.
- 12.73 The proposed development was assessed in Chapter 9 (Wind Microclimate) of the ES (Nov 2021) and the subsequent addendums. The baseline conditions around the site in its existing condition (referred to as the 'existing site') and within the wider surrounding area (within a 360m radius of the site) have been defined using wind tunnel testing to provide a detailed, quantitative assessment of the existing wind microclimate conditions in terms of pedestrian comfort and safety.
- 12.74 The design has been developed to include wind mitigation measures such as screens around seating on the podium level; balustrades, 2.5m high trees potted trees and shrubs, pergolas and a 50% porous roof for the terrace of Block A; balustrades to balconies on the eastern elevation of Block B1 and landscaping in the form of tree provision or suitable planting.
- 12.75 Overall pedestrian comfort and safety are assessed to be suitable for walking, sitting, and standing within the site and in the vicinity during both the winter and summer months and no specific mitigation measures would be required. Officers consider that the proposed development accords with Policies GG1, Page 219 D8 and D9 of the London Plan (2021) and Policies DC3 and CC2 of the Local Plan (2018).

## **13.0 SOCIO ECONOMICS/ EQUALITY CONSIDERATIONS**

### **Socio-economic**

- 13.1 The NPPF (paragraph 38) states that as well as improving environmental conditions, local planning authorities should work proactively with applicants to secure developments that will improve the economic and social conditions of the area. In particular, paragraph 8 acknowledges that these three overarching objectives, are interdependent and need to be pursued in mutually supportive ways:
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
  - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the

needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective – to protect and enhance our natural, built and historic environment.

- 13.2 The London Plan states that good growth that is socially and economically inclusive and environmentally sustainable underpins the whole of the London Plan (paragraph 1.01). London Plan Policy GG1 seeks to build strong and inclusive communities through inclusive engagement. London Plan Policy GG2 seeks to make the best use of land in Opportunity Areas to support amongst other things additional homes and workspaces that are car free and well connected by public transport, walking and cycling. The supporting paragraph 1.3.1 notes that the mental and physical health of Londoners is, to a large extent, determined by the environment in which they live. Transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics.'
- 13.3 The Local Plan will set out the council's vision for the borough until 2035, including placing more people in decent, affordable homes in a stronger local economy that provides training and job opportunities for local residents. Strategic Policy SFRRRA seeks 500 jobs within the South Fulham Riverside area. 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. Supporting paragraph 7.2.1 acknowledges that the borough faces socio-economic difficulties, including acute affordable housing need and high levels of deprivation. Continued economic growth in the borough will require a growing work force. These jobs will not go to unemployed residents in the borough unless they have the necessary qualifications and skills. Where major developments come forward that do not employ and/or train local people in their construction/operation, they will aggravate this situation.
- 13.4 The proposed residential led development would provide 276 new homes; 35% of these would be affordable. A large proportion of these homes are targeted at families where the need amongst local residents severe. In addition, the re-provided safeguarded wharf facility would create new employment floorspace and associated local jobs. The construction period would result in employment for a period of time and the s106 secures training and employment opportunities for local residents.
- 13.5 The development would include improved public access to the river, help to displace traffic p by making use of sustainable marine transport, contribute to pedestrian and cycle improvements at the Wandsworth Bridge Road junction and include noise, air quality and vibration mitigation measures.
- 13.6 Under Local Plan Policy CF1, the Council will work with its strategic partners to provide borough-wide high quality accessible and inclusive facilities and services for the community. Supporting paragraph 9.3 makes clear that the Council will ensure that the strategies for the borough's four regeneration areas fully take into account the need to provide appropriate education. Furthermore, para 9.5 sets out key educational priorities which include meeting the statutory responsibility to meet

demand for school places.

- 13.7 The Council's Children's Services have considered the proposals. The development is anticipated to potentially generate a need for 142 primary places. The nearest primary schools are Langford, Sullivan, and Holy Cross/Fulham Bilingual. The closest secondary schools are Fulham Boys, Lady Margaret and LOS.
- 13.8 Children's services concluded that there are sufficient primary school places within the accepted DfE travel time to school allowances. It is acknowledged that demand may be more acute at secondary phase, but pressure is usually mitigated by secondary aged students travelling beyond their borough of residence to attend the high school of their choice. The proposals accord with Policy CF1 of the Local Plan.
- 13.9 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.

## **14.0 COMMUNITY INFRASTRUCTURE LEVY (CIL)**

### **Mayoral / Borough CIL**

- 14.1 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. The GLA expect the Council, as the Collecting Authority, to secure the levy in accordance with London Plan Policy 8.3.
- 14.2 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.
- 14.3 Community Infrastructure Levy is payable, both to the London Mayor and to the Borough (although certain types of use/floorspace are exempt from Borough CIL given the site's location). The development also qualifies for Social Housing Relief.
- 14.4 In conclusion the estimated payable amount for Mayoral CIL would be £2,210,180 and an estimate for LBHF Borough CIL of £12,562,660 . This would be total of £14,772,820 payable CIL.

## **15.0 SECTION 106 HEADS OF TERMS**

- 15.1 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'.

- 15.2 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.
- 15.3 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).
- 15.4 The planning obligations set out in the heads of terms below are however 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, including financial obligations 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.
- 15.5 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.
- 15.8 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:

**1) Affordable Housing**

35% split 47:53 between social rent and intermediate.

**2) Employment & Skills**

- 10% of the labour employed in the construction phase to be Hammersmith & Fulham residents, of which
- 32 are apprenticeships and
- 14 are paid work experience placements, plus
- 14 unpaid work experience placements for H&F residents and/or students of H&F schools, plus
- £336,000 financial contribution towards E&S, plus
- 10% of the build cost to be spent on businesses based in H&F, plus
- £6,375 financial contribution to supporting Small to Medium Enterprises be included in the supply chain.

**3) Carbon Offsetting**

£203,743 payment lieu

**4) Parks Contribution**

£47,250 (to mitigate on site shortfall for older children)

**5) Air Quality Dust Management Plan (AQDMP) Monitoring**

£10,000 per annum throughout demolition and construction phases

**6) Maintenance of river walk and public realm**

To be secured in perpetuity

**7) Local Law Enforcement (the river walk and public)**

£80,000

**8) Site Operations Management Plan**

Operational Management Plan for the residential / commercial use and a Wharf operational plan.

**9) Highways**

- Junction improvements to Wandsworth Bridge Road/Carnwath Road/Townmead Road – providing new cyclist/ pedestrian facilities
- Thames Footpath Extension, Public Right of Way obligation, public access to the Thames path  
And Safeguard future access / connectivity under Wandsworth Bridge and to the wider Thames Path network.
- Car club memberships
- Car and Cycle Parking Management Plan
- Controlled Parking Zone review contribution £15,000
- Micromobility hub provision
- Resident and business car parking - permit free
- Servicing & Delivery Management Plan monitoring (£3000 per annual review for Years 1, 3, and 5)
- Residential and Commercial Travel plan and monitoring (£5000 per annual review, years 1,3 and 5)
- Construction Workforce Travel Plan & Monitoring Contribution £3,000 per annum
- Provision of a Demolition and Construction Logistics Plans, and monitoring (£5,000 per annum)
- S278 Highways works including footway and new crossover, amendment to existing parking / waiting restrictions, and tree planting/greening on Townmead Road. Improvements to the existing pedestrian and cycling environment surrounding the immediate vicinity of the Site (including wayfinding measures), and implementation of a scheme to improve crossing facilities at the junction of Wandsworth Bridge Road, Carnwath Road and Townmead Road.

**10) Wheelchair Accessible Units**

10% of all units (4 in total) within Residential Building to be provided as Wheelchair User Dwellings meeting the requirements set out in M4(3)(2)(b) category 3: "wheelchair user dwellings" of the 2015 edition.

## **11) Legal Fees**

A commitment to meet the costs of the Council's associated legal fee

### **16.0 CONCLUSION**

- 16.1 In considering the planning application, 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.
- 16.2 In the assessment of the application regard has been given to the NPPF, London Plan, and Local Plan policies as well as guidance.
- 16.3 The proposal would result in the redevelopment of a site within the South Fulham Riverside Regeneration Area and will contribute to 276 new homes (including 35% affordable housing) and jobs set out in the London Plan (2021). The re-instigation of a working wharf with modern facilities to enable long term viability of cargo related activities along the Thames (potentially reduces deliveries on the local road network), the provision of affordable homes and commercial uses would represent a significant betterment of the current underuse of the site. It is considered that the proposal is acceptable in land use and the quantum of the proposed land uses, will not give rise to any unacceptable impacts within this urban Regeneration Area within inner London and will amount to sustainable development in accordance with the National Planning Policy Framework.
- 16.4 The impact of the proposed development upon adjoining occupiers is considered on balance to be acceptable. It is acknowledged that the proposal results in some instances whereby some losses of sunlight or daylight are recorded within adjacent developments and existing residential receptors. The resulting retained sunlight and daylight conditions within the most affected properties are considered to be typical of high-density urban high-rise developments. Consideration has also been given to issues relating to noise/disturbance and outlook/overlooking/loss of privacy and assessed in the round it is not considered that the likely Impacts would be such as to warrant refusing planning permission, taking into account the wider benefits of the scheme.
- 16.5 The redevelopment would contribute beneficially to the local area and the borough by creating a high-quality built environment, delivering a good sustainability rating, and would see a car-free development with policy compliant cycle spaces and adapting to climate change.
- 16.6 The height, scale and massing of the proposed built form is considered appropriate and provides a high-quality design response to the site and surrounding townscape context; namely complementing the quality of other developments either consented/implemented within the South Fulham Riverside Regeneration Area. . The elevations have an architectural character which provide interest and the relationship between the built form and public realm would assist in the creation of a sense of place. Public realm improvements, including the extension and delivery of a fully accessible Thames Path and podium level public space within the site.
- 16.7 The application site is in the South Fulham Riverside 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.

- 16.8 The proposals are not considered to result in any harm to the Sands End conservation area, or to the setting of adjacent designated/non designated heritage assets. The proposals are therefore considered to be in accordance with the NPPF with regards to heritage.
- 16.9 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.