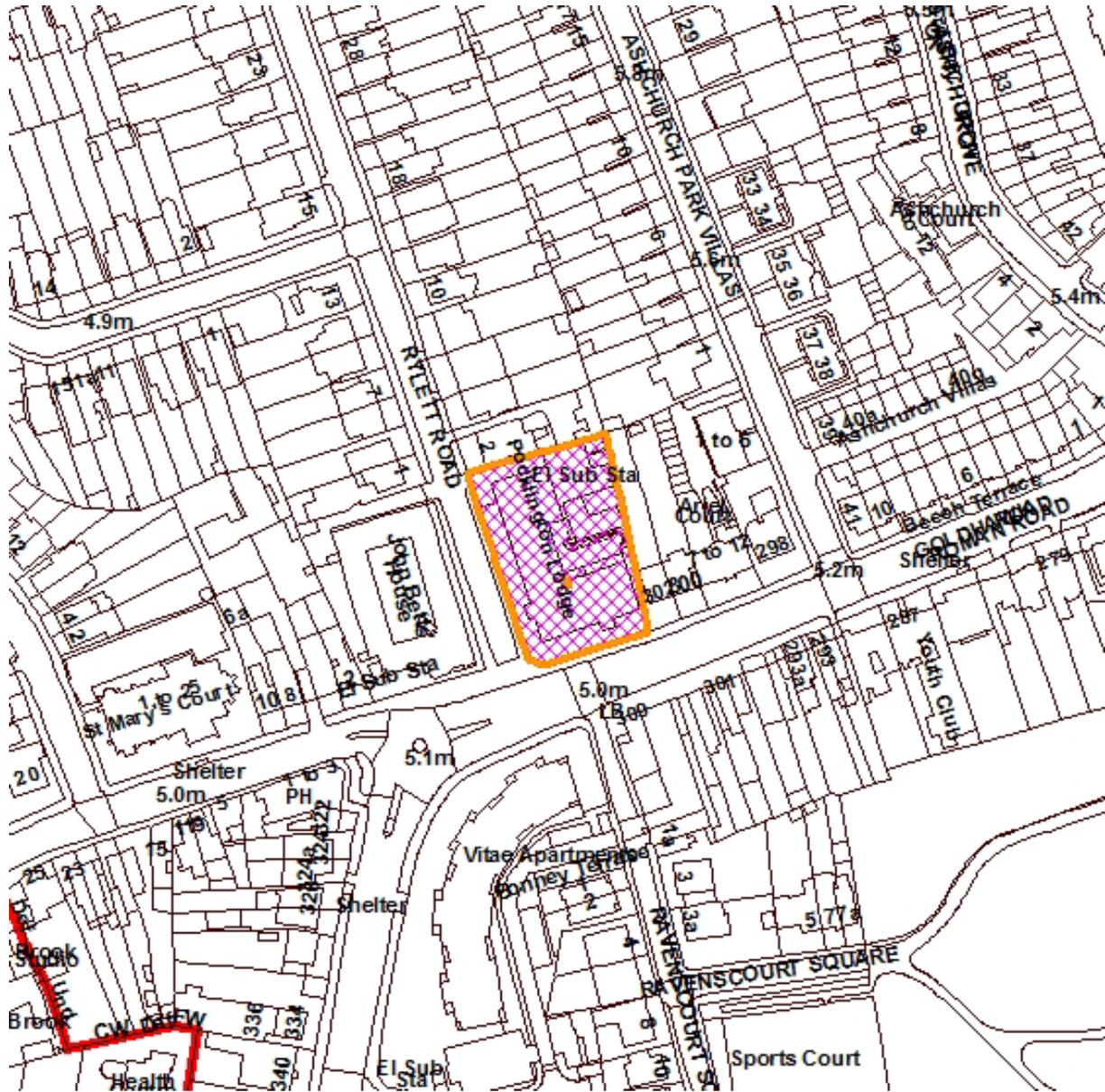


**Ward:** Wendell Park

**Site Address:**

Pocklington Lodge Rylett Road London W12 9PQ



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

**Reg. No:**  
2023/00717/FUL

**Case Officer:**  
Anisa About

**Date Valid:**  
27.04.2023

**Conservation Area:**  
Constraint Name: Ravenscourt And Starch Green  
Conservation Area - Number 8

**Committee Date:**  
16.07.2024

**Applicant:**

Thomas Pocklington Trust  
c/o Agent 203 Westminster Bridge Road Lambeth London  
SE1 7FR  
United Kingdom

**Description:**

Demolition of rear buildings (including Warden's bungalow); Erection of new two storey Mews building to provide 4 x 1-bed new residential units (Use Class C3) and part one-part two storey upward extension to Pocklington Lodge to provide 15 x 1-bed additional residential units (Use Class C3) for blind and visually impaired persons, cycle storage, refuse storage, new landscaping and amenity space, new dog run, fenestration changes to existing building and other associated works.

Drg Nos: Refer to Condition 02.

**Application Type:**

Full Detailed Planning Application

**Officer Recommendation:**

(1) That the Committee resolve, 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.

**Conditions:**

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

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

- 2) The development hereby permitted shall be carried out in complete accordance with the following approved drawing numbers, other than where those details are altered pursuant to the conditions of this planning permission:

Proposed Site Plan: 21-108\_050\_P7  
Proposed Ground Floor Plan: 21-108\_100\_P8  
Proposed First Floor Plan: 21-108\_101\_P7  
Proposed Second Floor Plan: 21-108\_102\_P7  
Proposed East and West Elevations: 21-108\_400\_P6  
Proposed North Elevations: 21-108\_401\_P6  
Proposed South Elevations: 21-108\_402\_P6  
Proposed Street Elevations: 21-108\_405\_P2  
Received: 04/07/2024

+ Approved documents:

Addendum Report dated July 2024 Revision P1;  
Heritage Statement prepared by JMS Planning and Development Ltd dated March 2023;  
Arboricultural Impact Assessment prepared Silva Arboricultural Ltd ref.23011, dated March 2023;  
Daylight & Sunlight Report prepared by Delva Patman Redler dated 28 February 2023;  
Flood Risk Assessment and SuDS/Drainage Strategy prepared by Mason Navarro Pledge ref: 222478-MNP-XX-XX-RP-C-0001 REV P02, dated March 2023;  
Energy & Sustainability Statement prepared by JS Lewis Ltd, dated March 2023;  
Proposed UGF Plan dwg. ref: 21-108 SK-25 Rev.P1 and Urban Greening Factor Sheet;  
Transport Statement prepared by Pulsar Transport, dated March 2023;  
Fire Safety Statement prepared by CHPK Fire Engineering Limited, ref. FE01716 Rev.A, dated 09 March 2023;  
Structural Engineering Feasibility Report prepared by Tully De'Ath Consultants dated 29 November 2018;  
Construction Management and Logistics Plan (First Draft);  
Design and Access Statement dated July 2024 version P2.

To ensure full compliance with the planning application hereby approved and to prevent harm arising through deviations from the approved plans.

- 3) Prior to commencement of above ground works, a revised energy strategy to include full details of the energy efficiency measures and on-site renewable energy generation (such as air source heat pumps) be submitted to and approved in writing by the Council, to demonstrate achievement of the minimum carbon reduction levels as set out in the approved energy strategy (reference report).

Approved details shall be fully implemented and permanently retained and maintained for the lifetime of the development.

In the interests of energy conservation and reduction of CO2 emissions, in accordance with Policies SI2 and SI4 of the London Plan (2021), and Policies CC1 and CC2 of the Local Plan (2018).

- 4) The development shall be carried out and completed in full accordance with the details contained within the approved Flood Risk Assessment and SuDS/Drainage Strategy by Mason Navarro Pledge dated March 2023 (ref: 222478-MNP-XX-XX-RP-C-0001 REV P02). All flood prevention and mitigation measures (including Sustainable Drainage Measures) shall be installed prior to occupation of the hereby approved flats which shall be created in accordance with the contents of the approved FRA. The development shall be permanently retained in this form and be maintained as necessary thereafter.

To limit the impact on flood risk and mitigate the susceptibility of the development to flooding in accordance with Policies CC2, CC3 and CC4 of the Local Plan (2018).

- 5) Prior to the commencement of the demolition phase (excluding installation of hoarding around the perimeter of the site) of the development hereby permitted, an Air Quality Dust Management Plan (AQDMP) in order to mitigate air pollution shall be submitted to and approved in writing by the Council. The AQDMP submitted shall be in accordance with the Councils AQDMP Template 'B' and shall include the following details:

- a) Site Location Plan indicating sensitive off-site receptors within 50m of the red line site boundaries
- b) Demolition 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 on-site and 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 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 Low/Medium Dust Risk Rating of the site and shall be in a table format.
- f) Details of installation of solid hoarding (minimum height of 2.5 m) including photographic confirmation of installed hoarding around the perimeter of the site
- g) Details of Site Dust Monitoring Procedures and Protocols including photographic confirmation of the installation of a minimum of 4 x Dust Deposition monitors on the site boundaries used to prevent dust levels exceeding the Site Dust Action Level (SDAL) of 200 mg/m<sup>2</sup>/day, averaged over a 4-week period as referenced in paragraph 4.41 of IAQM 'Monitoring in the Vicinity of Demolition and Construction Sites', Version 1.1, October 2018 guidance.
- 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 V NO<sub>x</sub> and PM10 emission criteria of The Non-Road Mobile Machinery (Type-Approval and Emission of Gaseous and Particulate Pollutants) Regulations 2018 and its subsequent amendments. This will apply to both variable and constant speed engines for both 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 and Euro VI

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

- 6) Prior to the commencement of the construction phase (excluding installation of hoarding around the perimeter of the site) of the development hereby permitted, an Air Quality Dust Management Plan (AQDMP) in order to mitigate air pollution shall be submitted to and approved in writing by the Council. The AQDMP submitted shall be in accordance with the Councils AQDMP Template 'D' and shall include the following details:
- a. Site Location Plan indicating sensitive off-site receptors within 50m of the red line site boundaries
  - b. Demolition Site and Equipment Layout Plan
  - c. Inventory and Timetable of dust generating activities during construction site activities.
  - d. Air Quality Dust Risk Assessment (AQDRA) that considers the potential for dust soiling and PM10 (human health) impacts for sensitive receptors on-site and off-site of the development within 250 m of the site boundaries during the construction phase and is undertaken in compliance with the methodology contained within 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 Low/Medium Dust Risk Rating of the site and shall be in a table format.
  - f. Details of installation of solid hoarding (minimum height of 2.5 m) including photographic confirmation of installed hoarding around the perimeter of the site
  - g. Details of Site Dust Monitoring Procedures and Protocols including photographic confirmation of the installation of a minimum of 4 x Dust Deposition monitors on the site boundaries used to prevent dust levels exceeding the Site Dust Action Level (SDAL) of 200 mg/m<sup>2</sup>/day, averaged over a 4-week period as referenced in paragraph 4.41 of IAQM 'Monitoring in the Vicinity of Demolition and Construction Sites', Version 1.1, October 2018 guidance.
  - 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 V NOx and PM10 emission criteria of The Non-Road Mobile Machinery (Type-Approval and Emission of Gaseous and Particulate Pollutants) Regulations 2018 and its subsequent amendments. This will apply to both variable and constant speed engines for both NOx and PM. An inventory of all NRMM for the first phase of construction shall be registered on the London City Hall NRMM register GLA-NRMM-Register prior to commencement of construction 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 and Euro VI

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

In the interests of air quality, in accordance with Policy SI1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

- 7) Prior to commencement of above ground works in the development hereby permitted, a Ventilation Strategy Report to mitigate the impact of existing poor air quality for the nineteen self-contained dwellinghouses (Use Class C3) shall be submitted to and approved in writing by the Local Planning Authority. This is applicable to all residential floors where Hammersmith & Fulham Councils 2030 Annual Mean Air Quality Targets for Nitrogen Dioxide (NO<sub>2</sub>) - 20ug/m<sup>3</sup> , Particulate (PM10) -20ug/m<sup>3</sup> and Particulate (PM2.5) - 10 ug/m<sup>3</sup> are exceeded 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 elevation of all residential floors
- b) Details and locations of ventilation extracts, to demonstrate that they are located a minimum of 2 metres away from the air ventilation intakes on all residential floors, 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
- c) Details of the independently tested mechanical ventilation system with Nitrogen Dioxide (NO<sub>2</sub>) and Particulate Matter (PM2.5, PM10) filtration with air intakes on the rear elevation to remove airborne pollutants. The filtration system shall have a minimum efficiency of 90% in the removal of Nitrogen Oxides/Dioxides, Particulate Matter (PM2.5, PM10) in accordance with BS EN ISO 10121-1:2014 and BS EN ISO 16890:2016.
- d) 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.

The whole system shall be designed to prevent summer overheating and minimise energy usage. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications and shall be the responsibility of the primary owner of the property. Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

In the interests of air quality, in accordance with Policy SI1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

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

In the interests of air quality, in accordance with Policy SI1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

- 9) Prior to occupation of the development hereby permitted, the installation/commissioning certificates of electric induction cooking stove in the kitchens of the nineteen self-contained dwellinghouses (Use Class C3) 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.

In the interests of air quality, in accordance with Policy SI1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

- 10) Prior to the occupation of each phase of the development hereby permitted, details of the proposed hard and soft landscape scheme in full accordance with the 'Using Green Infrastructure to Protect People from Air Pollution', Mayor of London, GLA, April 2019 guidance to mitigate existing poor air quality shall be submitted to and approved in writing by the Local Planning Authority. The details shall include green vegetation barrier (minimum height of 1.5 metres) on the site boundaries with Goldhawk Road (A402) and Rylett Road; planting schedules and details of the species, height and maturity of replacement trees and shrubs including sections through the planting areas, depths of tree pits, containers, and shrub beds; hard surfacing materials and an implementation programme. 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. Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

To ensure a satisfactory external appearance of the development, and in the interests of urban greening in accordance with Policies D3, G5 and G7 of the London Plan (2021), and Policies DC1, DC2, OS1 and OS5 of the Local Plan (2018).

- 11) 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 each of the fifty-three self-contained residential units (Class C3) use and the non-residential uses (Classes E, F.1 and F.2) 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.

In the interests of air quality, in accordance with Policy SI1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

- 12) A minimum of one month prior to occupation of the development hereby permitted, details of the installation/commissioning reports of the Waste Water Heat Recovery System for the nineteen self-contained dwellinghouses (Use Class C3) 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.

In the interests of air quality, in accordance with Policy SI1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

- 13) No development shall commence until a preliminary risk assessment report is submitted to and approved in writing by the Council. This report shall comprise: a desktop study which identifies all current and previous uses at the site and surrounding area as well as the potential contaminants associated with those uses; a site reconnaissance; and a conceptual model indicating potential pollutant linkages between sources, pathways and receptors, including those in the surrounding area and those planned at the site; and a qualitative risk assessment of any potentially unacceptable risks arising from the identified pollutant linkages to human health, controlled waters and the wider environment including ecological receptors and building materials. All works must be carried out in compliance with and by a competent person who conforms to LCRM: Land Contamination Risk Management (Environment Agency 2023) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. This condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with policy CC9 the Local Plan (2018) and key principles LC1 to LC7 of the Planning Guidance Supplementary Planning Document (2018).

- 14) No development shall commence until a site investigation scheme is submitted to and approved in writing by the Council. This scheme shall be based upon and target the risks identified in the approved preliminary risk assessment and shall provide provisions for, where relevant, the sampling of soil, soil vapour, ground gas, surface and groundwater . All works must be carried out in compliance with and by a competent person who conforms to LCRM: Land Contamination Risk Management (Environment Agency 2023) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. This condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with policy CC9 the Local Plan (2018) and key principles LC1 to LC7 of the Planning Guidance Supplementary Planning Document (2018).



- 15) Unless the Council agree in writing that a set extent of development must commence to enable compliance with this condition, no development shall commence until, following a site investigation undertaken in compliance with the approved site investigation scheme, a quantitative risk assessment report is submitted to and approved in writing by the Council. This report shall: assess the degree and nature of any contamination identified on the site through the site investigation; include a revised conceptual site model from the preliminary risk assessment based on the information gathered through the site investigation to confirm the existence of any remaining pollutant linkages and determine the risks posed by any contamination to human health, controlled waters and the wider environment. All works must be carried out in compliance with and by a competent person who conforms to LCRM: Land Contamination Risk Management (Environment Agency 2023) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. This condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with policy CC9 the Local Plan (2018) and key principles LC1 to LC7 of the Planning Guidance Supplementary Planning Document (2018).

- 16) Unless the Council agree in writing that a set extent of development must commence to enable compliance with this condition, no development shall commence until, a remediation method statement is submitted to and approved in writing by the Council. This statement shall detail any required remediation works and shall be designed to mitigate any remaining risks identified in the approved quantitative risk assessment. All works must be carried out in compliance with and by a competent person who conforms to LCRM: Land Contamination Risk Management (Environment Agency 2023) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. This condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with policy CC9 the Local Plan (2018) and key principles LC1 to LC7 of the Planning Guidance Supplementary Planning Document (2018).

- 17) Unless the Council agree in writing that a set extent of development must commence to enable compliance with this condition, no development shall commence until the approved remediation method statement has been carried out in full and a verification report confirming these works has been submitted to, and approved in writing, by the Council. This report shall include: details of the remediation works carried out; results of any verification sampling, testing or monitoring including the analysis of any imported soil; all waste management documentation showing the classification of waste, its treatment, movement and disposal; and the validation of gas membrane placement. If, during development, contamination not previously identified is found to be present at the site, the Council is to be informed immediately and no further development (unless otherwise agreed in writing by the Council) shall be carried out until a report indicating the nature of the contamination and how it is to be dealt with is submitted to, and agreed in writing by, the Council. Any required remediation shall be detailed in an amendment to the remediation statement and verification of these works included in the verification report. All works must be carried out in compliance with and by a competent person who conforms to LCRM: Land Contamination Risk Management (Environment Agency 2023) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. This condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with policy CC9 the Local Plan (2018) and key principles LC1 to LC7 of the Planning Guidance Supplementary Planning Document (2018).

- 18) Unless the Council agree in writing that a set extent of development must commence to enable compliance with this condition, no development shall commence until an onward long-term monitoring methodology report is submitted to and approved in writing by the Council where further monitoring is required past the completion of development works to verify the success of the remediation undertaken. A verification report of these monitoring works shall then be submitted to and approved in writing by the Council when it may be demonstrated that no residual adverse risks exist. All works must be carried out in compliance with and by a competent person who conforms to LCRM: Land Contamination Risk Management (Environment Agency 2023) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. This condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with policy CC9 the Local Plan (2018) and key principles LC1 to LC7 of the Planning Guidance Supplementary Planning Document (2018).

- 19) Prior to commencement of the development, a noise assessment shall be submitted to the Council 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.

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

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

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by household/neighbour noise transmission to adjoining dwellings at unreasonable levels due to unsuitable layout and arrangement of rooms and communal areas, in accordance with Policies CC11 and CC13 of the Local Plan 2018.

- 21) Prior to commencement of the development, details shall be submitted to and approved in writing by the Council, of the sound insulation of the floor/ ceiling/ walls separating the plant rooms dwellings. Details shall demonstrate that the sound insulation value  $D_{nT,w}$  and  $L'_{nT,w}$  is enhanced by at least 10dB above the Building Regulations value and, where necessary, additional mitigation measures implemented to contain commercial noise within the commercial premises and to achieve the criteria  $L_{Amax,F}$  of BS8233:2014 within the dwellings/ noise sensitive premises. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

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

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

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

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

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

- 24) Prior to commencement of the development hereby approved, a Demolition Method Statement and a Construction Management Plan shall be submitted to and approved in writing by the Council. Details shall include control measures for dust, noise, vibration, lighting, delivery locations, restriction of hours of work and all associated activities audible beyond the site boundary to 0800-1800hrs Mondays to Fridays and 0800 -1300 hrs on Saturdays with no works permitted on Sundays and Bank Holidays, 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. Approved details shall be implemented 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, CC6, CC7, CC10, CC11 and CC12 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

- 25) Prior to occupation of the of the development hereby permitted, a Waste Management Strategy (WMS) shall be submitted to and approved in writing by the Local Planning Authority. Details shall include the management and times of refuse/recycling collection; details of the waste collection pick up area (within 10m drag distance of the public highway); and location of loading bays and vehicle movements. The approved details shall be implemented prior to occupation and the WMS hereby permitted shall thereafter operate in accordance with the approved details. The WMS shall be regularly monitored and reviewed and any subsequent modifications or alterations to the WMP should be submitted to and approved in writing by the LPA.

To ensure that satisfactory provision is made for refuse storage and collection and that associated vehicle servicing activities do not adversely impact on the highway, in accordance with Policy T7 of the London Plan (2021), and Policies CC7 and T2 of the Local Plan (2018).

- 26) The development shall be carried out and completed in full accordance with the details contained within the approved Fire Statement (prepared by CHPK Fire Engineering ref. FE01716 Rev. A, dated 09 March 2023). No part of the development shall be used or occupied until all mitigation, measures and means within the approved document have been implemented in full and shall thereafter be retained for the lifetime of the building hereby approved.

To ensure that the development incorporates the necessary fire safety measures in accordance with the Policy D12 of the London Plan (2021).

- 27) The hereby approved development must be implemented in strict accordance with the tree protection plan/measures outlined in the submitted Arboricultural Impact Assessment prepared Silva Arboricultural Ltd ref. 23011, dated March 2023.

In the interest of sustainability requirements and comply with Policies CC1 and OS5 of the Local Plan (2018).

- 28) Prior to commencement of the development, a full and detailed Staff/Visitor Travel Plan shall be submitted to and approved in writing by the Council and thereafter the development shall be carried out and operated in accordance with the agreed details contained within the plan.

Reason: To ensure that car journeys to the site are minimised as far as possible and promote sustainable and active travel to and from the site and thereby reduce negative impact on traffic, congestion and parking stress in the local area, in accordance with London Plan policies and policy T2 and T3 of the Local Plan (2018).

- 29) No part of the development hereby approved shall be occupied prior to the provision of the refuse storage enclosures, as indicated on the approved drawings. The refuse storage enclosures shall be permanently retained thereafter in accordance with the approved details.

Reason: To ensure that the use does not give rise to smell nuisance and to prevent harm to the character and appearance of the area arising from the appearance of accumulated rubbish, in accordance with Policies DC8, CC6 and CC7 of the Local Plan 2018.

- 30) The development hereby approved shall be carried out and completed in accordance with the details of the proposed cycle storage as shown on approved drawing:

Proposed Ground Floor Plan: 21-108\_100\_P8

This development shall not be occupied until the cycle storage provision has been made in accordance with the agreed details, and it shall be permanently retained and maintained for the life of the development.

To ensure satisfactory provision for the cycles and thereby promote sustainable and active modes of transport, in accordance with Policy T3 of the Local Plan (2018).

- 31) 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; balustrades or screening to balconies and roof terraces 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 DC1, DC2, DC3, DC8 and HO11 of the Local Plan (2018) and guidance contained within the Planning Guidance Supplementary Planning Document (2018).

- 32) 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 development shall be submitted and approved in writing by the Local Planning Authority. These shall include details of the proposed fenestration (including framing and glazing details) and entrances. 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 to preserve the character and appearance of the surrounding conservation areas and other heritage assets; in accordance with Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018), and guidance contained within the Planning Guidance Supplementary Planning Document (2018).

**Justification for Approving the Application:**

- 1) It is considered that the proposed development would result in an uplift of 16 residential units for blind and visually impaired people, that are of an acceptable standard, accord with the Nationally Described Spaces Standards (NDSS) and would help the council meeting housing targets. The proposal complies with Local Plan (2018) Policies HO1, HO4, HO5, HO6, HO11, CC1, CC7, CC9, CC10, CC11, CC13, T1, T2, T3 and T4, associated Key Principles of the Hammersmith and Fulham SPD (2021) and London Plan (2021) Policies D6, D12, D14, H1, HC1, SI1, T1, T5, T6, and T7. Additionally, works would serve to preserve the significance of the adjacent non-designated heritage assets and the character and appearance of the wider Ravenscourt and Starch Green conservation area, in accordance with s.16, 66 and s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF (2021), the London Plan (2021), Policies DC1, DC4 and DC8 of the Local Plan (2018) and Key Principles AH2 and CAG3 of the Planning Guidance SPD (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: 16th March 2023  
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

## **Consultation Comments:**

### **Comments from:**

The Hammersmith Society  
Historic England London Region  
Thames Water - Development Control  
Crime Prevention Design Advisor - Hammersmith

### **Dated:**

18.09.23  
11.05.23  
11.05.23  
31.05.23

## **Neighbour Comments:**

### **Letters from:**

Flat 17 Pocklington Lodge Rylett Rd London W12 9PQ  
37B Ashchurch park villas london London w12 9sp  
32 Pocklington Lodge Rylett Road London W12 9PQ  
32 Rylett Road London W12 9SS  
44 Pocklington Lodge Rylett Rd London W12 9PQ  
Flat 1 4 Rylett Road London W12 9NL  
Flat 1 4 Rylett Road London W12 9NL  
Flat 44 Pocklington Lodge Rylett Rd London W12 9PQ  
37B Ashchurch Park Villas London W12 9SP  
Flat 40 Pocklington Lodge Rylett Rd London W12 9PQ  
Flat 34 Pocklington Lodge Rylett Rd London W12 9PQ

### **Dated:**

19.05.23  
05.06.23  
08.06.23  
09.06.23  
17.05.23  
15.05.23  
23.05.23  
18.03.24  
05.06.23  
02.06.23  
07.06.23

## **1.0 SITE DESCRIPTION AND RELEVANT HISTORY**

- 1.1 The application site is located on the corner of Rylett Road and Goldhawk Road, within the Ravenscourt and Starch Green Conservation Area. The existing building contains 50 self-contained studio flats for blind or partially-sighted people and is owned by the Thomas Pocklington Trust charity.
- 1.2 The existing building is three storeys with an additional loft level. John Betts House, directly opposite on the western side of Rylett Road, is another substantial building and is two storeys with a loft level. The remainder of Rylett Road is predominantly made up of two-storey detached and semi-detached Victorian dwellings. Adjacent to the site to the east, the buildings at Nos. 300-302 Goldhawk Road are four storeys including a semi-basement, and are taller than the existing Pocklington Lodge.
- 1.3 There are a number of locally listed Buildings of Merit nearby, including Nos. 300 and 302 Goldhawk Road and the entire terrace on the south side of Goldhawk Road which runs through Nos. 279-309 Goldhawk Road.



#### 1.4 Relevant Planning history:

1997/02099/FUL - Redevelopment of site frontages on Rylett Road and Goldhawk Road by the demolition of the existing building and its replacement by a new three storey building to provide 24 one-bedroom self-contained flats, 3 two-bedroom self-contained flats and 5 bed-sitting rooms with 8 car parking spaces (including one garage) and associated landscaping. Approved 30 December 1997.

1999/00789/FUL - Conversion of superintendent's house into 2 no. self-contained flats and the erection of a dormer roof extension and an entrance porch. Approved 28 May 1999.

2020/00805/FUL - Erection of two additional storeys to the existing building at Pocklington Lodge in connection with the creation of 17 residential units for blind and partially-sighted people; formation of cycle storage, refuse storage and associated external works. Refused. 22.12.2021

Reasons for refusal can be summarised as follows:

1. The development is considered to be unacceptable in terms of design, architecture and visual amenity.
2. The development is not considered to provide satisfactory provision for inclusive access for all.
3. Insufficient detailed information has been supplied with the application to enable a full assessment of whether the proposals comply with the London Plan's sustainable drainage hierarchy
4. The proposed new units are not considered to provide a satisfactory level of amenity for the new occupants.
5. The applicant has not submitted a Planning Fire Statement that is considered to meet the requirements of London Plan (2021) Policy D12
6. The submitted Daylight and Sunlight Report does not contain an analysis of the impact of the development in terms of overshadowing of adjacent gardens and amenity spaces.

+ Current proposal:

- 1.5 The current application is for the demolition of rear buildings (including Warden's bungalow); Erection of new two storey Mews building to provide 4 x 1-bed new residential units (Use Class C3) and part one-part two storey upward extension to Pocklington Lodge to provide 15 x 1-bed additional residential units (Use Class C3) for blind and visually impaired persons, cycle storage, refuse storage, new landscaping and amenity space, new dog run, fenestration changes to existing building and other associated works.
- 1.6 The dog run will be relocated to the rear north-western corner of the site where a store currently stands. This would provide space for assistance/guide dogs to be exercised as needed.

- 1.7 The demolition of the Garden House will allow for the expansion and improvement of the courtyard to include new landscaping, planting, and seating areas resulting in an additional 137.1m<sup>2</sup> of communal amenity space. Additionally, the proposal provides 41.4m<sup>2</sup> of shared rooftop terrace to the north of the design. The overall shared amenity area is increased by 102%.
- 1.8 It is part of the proposal to expand the bin storage capacity on site. In this regard, the existing refuse store located adjacent to the vehicular access to the site will remain broadly in its current location and will be expanded to cope with the demand of the new residents. The bins in this store will be collected from Rylett Road, as existing.
- 1.9 No new car parking spaces are proposed as part of the development due to the fact that the proposed occupiers will be blind or significantly visually impaired.

+ Public Engagement

- 1.10 A Statement of Community Involvement (SOVI) supports the current planning application and summarises the pre-application engagement undertaken by the applicant.
- 1.11 A meeting with the residents was organised to take place via zoom on 23 November 2022, at 7pm. Following the meeting, a copy of the recording in the form of video and audio was circulated amongst tenants via e-mail. The main issues raised during this consultation event can be summarised as follows:
  - o Tenant disruption as building works is carried out
  - o Car parking
  - o Size of existing shared facilities including lounge and laundry room
- 1.12 A second consultation event was organised for the residents. To ensure meaningful engagement, the applicant commissioned braille plans and a 3-D Model of the proposal which was on display a week before the consultation meeting in the communal room of Pocklington Lodge. In addition, a draft Construction and Environmental Management Plan (CEMP) was circulated amongst tenants to address queries raised in the first consultation. This was to allow tenants to review the information prior to the consultation event.
- 1.13 A consultation event was organised for the week of Monday 5th to Friday 9th of December to take place in the communal room at Pocklington Lodge. An e-mail was sent to residents to inform them of the consultation event to be carried out in the site. Consultation was planned to start at 7:00 pm each evening to ensure all tenants could attend. Sessions finished at around 9:00 pm

1.14 The SOCI confirms the total number of tenants that attended the consultation were 34, which is a good level of turnout considering there are currently 46 tenants in total. After the week-long consultation event, a summary Q&A was prepared and circulated to tenants. In summary the feedback was generally supportive of the of additional accommodation on site. A summary of the responses is provided below:

- o Adequacy of dog pen in terms of capacity and location
- o Scope to provide a rooftop terrace for communal use
- o The need to design the outdoor amenity space to be fit for purpose, as there were some concerns regarding planting in the middle of the courtyard and how that could become a hazard.
- o Scope to provide additional car parking can be provided for resident's assistants/visitors
- o London Standard cycle parking provision - excessive as it is not required for tenants.
- o capacity of bin store and construction stages of the proposal including dust and mitigation measures and construction hours

1.15 Main changes to the scheme following consultation feedback include:

- o Changes to the layout of the fourth floor were made to allow for a roof terrace to be used as additional communal space.
- o The dog run and bike store were relocated, and the bike store capacity reduced in size and capacity to provide sufficient capacity for visitors only.
- o The design of the mews building was further developed to include directional windows to the first floor of Flat 3 to allow for more daylight.
- o Bins and car parking were re-conceived in order to incorporate an additional car parking space next to the existing bin store, resulting in 3 spaces in total.

+ Inclusive Design Review Panel

1.16 Proposals were presented to the Inclusive Design Review Panel on 19 March 2024. Overall, the panel were supportive of the approach to the extensions to the site to provide additional housing for blind and partially sighted people. They also supported works to upgrade the existing homes through provision of new windows and communal entrances circulation cores.

1.17 Many of the questions raised by the panel, related to the coproduction of the future design of upgraded areas of communal amenity within the building and within new external landscaped spaces; alongside how practical issues such as access to bin stores and areas for dog-runs would be secured. The panel were encouraged that the Thomas Pocklington trust had already undertaken consultation on these matters with the tenant resident association and had committed to further consultation post-planning approval in relation to the detailed design of these elements.

Officer comments - the support of the IDRPP regarding the design of the scheme and the enhancement of accesses to the development is acknowledged. Many of the points raised by the panel particularly in relation to upgrade of internal facilities do not require planning consent and can be dealt with through day-to-day building management. Other items mentioned as referenced in this report and may be subject to further detail through conditions.

## 2.0 PUBLICITY AND CONSULTATION RESPONSES

2.1 A site notice and press advert were published to advertise the application and 259 notification letters were sent to the occupants of neighbouring properties. 10 responses were received from 7 addresses within Pocklington Lodge.

2.2 The comments are summarised below:

- Concerns regarding overlooking, particularly if the Trust decide to sell the building to commercial or standard residential.
- The existing flats are in need of refurbishment, the Trust should allocated funds to this before adding more flats to the building.
- The proposal will harm the status of Ravenscourt and Starch Green Conservation area. It has no design flow and is overpowering and unsympathetic to local built environment which are mainly 3 floors tall. It is out of character to the area and neither adds character or blends into the fabric of the conservation area.
- The building works will be very disruptive in terms of noise and dust for occupants of Pocklington Lodge and neighbours.
- Communal facilities at the Lodge will become even more crowded due to addition of new residents;
- The Tenants' Association of Pocklington Lodge has surveyed 43 out of the 50 current tenants as to their stance on the proposed plans. The results are: 31 Object, 5 are in support and 7 are neutral. The majority of the tenants were in support of Thomas Pocklington Trust increasing the number of homes they have for blind/visually impaired people but the reasons why those who objected to the plans were as follows:
  - loss of sunlight to communal garden, not enough communal space for all residents, communal lounge will not be big enough, Some tenants are concerned that the kindness/generosity will be affected by the greater number of visually impaired people in the area, The new tenants of the building will require orientation training in the area. This service is usually provided by the council. It is already overstretched. disruption to health and safety during the construction of the new homes. For example, the noise, dust, new obstacles, lack of light to flats (due to scaffolding and boarding), lack of ventilation to flats, reduced use in facilities (including laundry, garden, guide dog toilet area, lift, etc). As the tenants of Pocklington Lodge are blind or severely sight impaired, this disruption is worse and may cause mental health issues. Tenants would like a written undertaking from Thomas Pocklington Trust that it will assist in relocating plants owned by the tenants and will be compensated new for old if the plants do not survive.

2.3 Case Officer comments: Material planning issues will be assessed in the report below. In respect of other matters:

- Officers note the concerns for the increase in the number of blind and partially-sighted people in the area, and the implications for the community. However, this is not a matter than can be considered as part of the planning application;
- Certain matters relating to the construction phase of any development on this site, such as vehicle logistics, and noise and nuisance control, could be controlled via conditions attached to any planning permissions. Other matters, such as security and access for existing residents, are the responsibility of the building owner/management;
- The status of other properties owned by the Trust is not a material planning consideration for this case, which must be determined on its own merits.

2.4 The Hammersmith Society commented that they objected to the previous 2020 scheme, however the current application proposals are a significant improvement on the previous scheme: the design is more sensitive to its urban context and addresses the priorities of the Conservation Area. The proposals bring variety and architectural order to the streetscape and have the potential to bring new life to this drowsy building. We would support approval of this scheme, conditional on the choice of external materials and development of the design of the top storey.

2.5 External and Statutory consultation responses:

2.6 Thames Water recommend conditions to secure surface and foul water details; and an informative relating to water pressure.

2.7 Metropolitan Police Designing Out Crime Officer (DOCOC) commented that as this is an extension atop an existing building and 4 new flats it is not suitable to achieve Secure by Design accreditation.

### 3.0 POLICY FRAMEWORK

3.1 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.

3.2 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).

3.3 In this instance the statutory development plan comprises the London Plan (2021) and the Local Plan (2018). A number of strategic and local supplementary planning guidance and other documents are also material to the determination of the application.

#### + National Planning Policy Framework (2023)

3.4 The National Planning Policy Framework (NPPF) came into effect on 27 March 2012 and was subsequently revised in 2019, 2021 and more recently in 2023 and 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.

3.5 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.

#### + London Plan

3.6 The London Plan was published in March 2021. It forms the Spatial Development Strategy for Greater London and sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. It forms part of the development plan for Hammersmith and Fulham.

#### + Local Plan

3.7 The Council adopted the new Local Plan on 28 February 2018. The policies in the Local Plan together with the London Plan make up the statutory development plan for the borough. The Planning Guidance Supplementary Planning Document (SPD) (February 2018) is also a material consideration in determining planning applications. It provides supplementary detail to the policies and is organised around key principles.

## 4.0 PLANNING CONSIDERATIONS

4.1 The key planning issues to be addressed as part of this proposal would be:

- o Land Use - The acceptability of the increase in units and the intensification of the use including Affordable housing;
- o The quality of the new flats to be created;
- o Design and visual amenity, including the impact on the character and appearance of the conservation area;
- o Impact on the existing amenities of neighbouring residents, in terms of light, outlook, privacy and sense of enclosure;
- o Construction management and logistics;
- o Highways matters, e.g. parking permits, cycle parking, refuse storage
- o Environmental Matters;

## 4.2 LAND USE

- 4.3 The new mews building and extension will provide a total of 19 new residential units. However, the number of net additional units are 16 units as three of the existing units will be lost with the re-configuration of the internal layout and plant rooms at Pocklington Lodge. This is considered to be acceptable in land use terms. Pocklington Lodge is a residential building, owned by the Thomas Pocklington Trust charity, with 50 existing studio units occupied by blind and visually impaired people. The additional 19 new units would also provide for this group. A legal agreement will ensure that the new units will only be occupied by blind and visually impaired people.
- 4.4 The provision of housing is a significant issue, with paragraph 60 of the National Planning Policy Framework (NPPF 2023) outlining that local planning authorities should seek to significantly boost the supply of housing. This need for housing is recognised within Policy H1 of the London Plan (2021), with Table 4.1 of this Policy outlining that a minimum of 1,609 new residential dwellings should be provided per year within the Borough of Hammersmith and Fulham up to 2031. Policy HO1 of the Local Plan (2018) specifies that the Borough of Hammersmith and Fulham will continue to seek at least 1,031 additional dwellings a year in the period up to 2035.
- 4.5 The proposal would result in the net-gain of sixteen (16) residential units. Officers consider that this would be consistent with the aims of the NPPF (2023), Policy H1, Table 4.1 of the London Plan (2021) and Policy HO1 of the Local Plan (2018).

### + History of the Thomas Pocklington Trust

- 4.6 Pocklington Lodge was opened by the Pocklington Trust on 28 October 1968, as at the time the Trustees identified that whilst there were plenty of employment opportunities available to workers with a visual impairment in London, the same could not be said for the capital's stock of suitable, affordable housing. Pocklington Lodge has remained with the charity since its opening in 1968 and in order to meet increased demand, additional residential units are now proposed.
- 4.7 The Planning statement outlines the need for accommodation for blind and partially sighted people. The Registered Blind and Partially Sighted People, England 2019-2020 Report published by the National Statistics on 25 Feb 2021 confirms that there were 20,945 new registrations in the period of 2019-2020 or 57 new registrations per day. This has increased slightly from 56 a day (20,605 new registrations) in 2016-2017.
- 4.8 In London, as of 31st March 2020, 40,415 people have been registered as blind/partially sighted which represents an increase of 1,185 people from March 2017 data.
- 4.9 In Hammersmith and Fulham, a total of 875 people were registered as being blind or partially sighted of which 610 are registered blind/severely sight impaired persons and 270 are registered as partial sight/sight impaired persons of which 125 are 75 years of age or over, 25 are between 65-74 years old, 60 are between 50-64 years old and 55 are between the age of 18-49.

- 4.10 It is important to highlight that people that have a Certificate of Vision Impairment (CVI) from an ophthalmologist choose whether to be included in their Local Authority's register of blind or partially sighted people; registration is not automatic and so not everybody that has been certified as having vision impairment is recorded on a Local Authority register.
- 4.11 According to National Statistics in Hammersmith and Fulham only, the working age population of registered people with visual disabilities is estimated to be 360. Taking into consideration the statistics, the need for this type of facilities will increase rather than decrease in the near future. The aim of the Pocklington Trust is to support the visually impaired, with a special focus on people who are of working age, as to enable them to enjoy good fortunes ranging from emotional and physical well-being to economic circumstances and networks.
- 4.12 Given the shortage of dedicated facilities for the visually impaired within the locality and within the wider area of London, it is considered that the application proposal will meet an important need and the provision of high quality housing for visually impaired people. The proposal would result in a moderate intensification of an existing specialist accommodation for the blind and visually impaired. The existing building contains 50 studio units. The proposal will result in an uplift of 16 new high quality residential units designed to accommodate the needs of blind and visually impaired people. The scheme proposes one-bedroom units only, and of a size that comply with Nationally Described Spaced Standards. Owing to the specific needs of blind and partially sighted residents, all new units are provided with a separate bedroom, which aids in navigation and is a requirement for the many residents who have an assistance dog. This is supported by Local Plan policy H07.

+ Affordable Housing

- 4.13 Local Plan Policy HO4 (and London Plan Policy H4) require that developments of 11 or more self-contained dwellings to provide affordable housing in line with the council's borough-wide target of 50% and the relevant tenure splits.
- 4.14 In this case, given the specialist nature of the housing to be provided, it is not considered that formal affordable housing provision is required. The proposed units are for the sole use of the Thomas Pocklington Trust, a charity which provides low-cost, specialist accommodation for blind or partially sighted people. If the application were to be approved, the applicant has indicated their agreement to enter into a s106 Legal Agreement which confirms that the units will only be occupied by qualifying persons with specialist needs.

## 5.0 HOUSING QUALITY AND DENSITY

- 5.1 In order to optimise the use of land London Plan Policy D3 and GG2 state development should 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 to jobs, services, infrastructure and amenities by public transport, walking and cycling. Para. 3.3.21 states comparing density between schemes using a single measure can be misleading as it is heavily dependent on the area included in the planning application site boundary as well as the size of residential units.



- 5.2 London Plan Policy H2 (Small sites) sets out that Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making. The site is approximately 0.19 hectares in size and therefore represents a small site for the purpose of this policy.
- 5.3 Local Plan Policy HO4 expects housing in existing residential areas to be predominantly low to medium density and to consist of low to medium rise developments, it recognises that high density development may be appropriate in highly accessible areas, subject to design, compatibility with local contexts and transport impacts and highway capacity. It adds that high density housing with limited car parking can help ensure housing output is optimised and may be appropriate in locations with high levels of PTAL, provided it is compatible with the local context and principles of good design and is satisfactory in other respects.
- 5.4 The proposed additional floors will contain a total of 19 units, however the net uplift is 16 additional units, as three of the existing units would be lost as a result of the re-configuration of the internal layout and plant rooms. It is assumed that the existing residents would be re-accommodated within the new extension, however this is a matter for the Trust and not a material Planning consideration.
- 5.5 According to London Plan Policy D6, the minimum GIA for a one-bed, one-person (i.e., studio) unit is 39sq.m. where a full bathroom is provided. For a one-bed, two-person unit the minimum is 50sq.m. Planning Guidance SPD Key Principles HS1 and HS2 are also relevant with regards to internal space and amenity space provision for new dwellings, and reflects the requirements set out in the abovementioned London and National standards. A minimum of 5sq.m. of private outdoor space should be provided for a 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. In exceptional circumstances, where site constraints make it impossible to provide private open space for all dwellings, a proportion of dwellings may instead be provided with additional internal living space equivalent to the area of the private open space requirement.
- 5.6 Local Plan Policy HO6 requires 10% of new housing should meet the Building Regulations requirement M4(3) 'Wheelchair user dwellings' and be designed to be accessible to wheelchair users. The remaining 90% should meet M4(2) 'Accessible and adaptable dwellings' where feasible.
- 5.7 In considering appropriate residential densities, London Plan Policy D3 moves away from a focus on numerical density ranges towards a focus on a design-led approach, that also takes into account existing and planned infrastructure provision.

- 5.8 A total of 15 x 1b 1p and four x 1b 2p mews style dwellings are proposed. All units comprise a kitchen, a living room, and a separate bedroom and bathroom. All have GIA of between 37-53sq.m. Although the Council would not usually allow 1-person units studio to have a separate bedroom, preferring them to be true studio-style open-plan layouts to compensate for the smaller size, in this case Officers are prepared to accept the applicant's justification that a physically separated bedroom is required due to the specialist nature of the accommodation. The Trust advises that open-plan rooms/ units are not advisable for people with visual impairments because the separation between rooms aides wayfinding around the flat and there is also a need for the occupant to sleep in a separate room to a guide dog. Accordingly, having regard to the exceptional circumstances of this case, the proposed layouts are considered to be acceptable for the number of people each is designed to accommodate.
- 5.9 15 of the 19 new flats proposed include private amenity space of minimum 5sqm and minimum width of 1.5m. Residents would also have access to the existing communal garden and amenity space. Currently, shared external amenity space is provided in the form of a small courtyard garden area on the north side of the building. The demolition and relocation of the rear building will result in an additional 137.1 sqm of communal amenity space and it is part of the proposal to provide a 41.4 sqm rooftop terrace.
- 5.10 This creates a total of 338.6 sqm of communal amenity space on site, roughly equating to around 4.9m<sup>2</sup> per person. The overall shared amenity area on site is increased by 102%, this is considered to be an acceptable approach given the specialist nature of the use of the site.
- 5.11 9 out of the 19 new units would be dual aspect. All of the habitable rooms benefit from at least one window. It is considered that the new units would benefit from acceptable levels of light and outlook. Given the separation distance and relationship with surrounding buildings, there would be no privacy or overlooking issues for the new units or for neighbours. Conditions are attached for details of enhanced sound insulation between the flats, to ensure that undue noise and disturbance does not transfer between them.

+ Accessibility

- 5.12 In accordance with the London Plan Policy D7 and Local Plan Policy HO6 the standards for access require 90% of the units to be built to building regulations standard M4(2) 'Accessible and adaptable buildings', with the remaining 10% built to standard M4(3) 'Wheelchair accessible dwellings'.

5.13 In respect of access, the new units will be accessed internally from the existing stairwell and the existing lift to the new proposed third and fourth floors. For this development, which is for 16 net new dwellings, two would require to be wheelchair accessible M4(3) and the remainder should meet M4(2). The wheelchair accessible dwellings would be the two ground floor units in the mews building, which are wheelchair accessible units - M4(3)(2b) compliant- and the rest of the proposed units are accessible and adaptable dwellings - M4(2) compliant. The wheelchair units would have level access, and direct access to private external amenity. In this respect, the proposal would provide suitable accessibility for all potential occupiers in accordance with London Plan Policy and D7 and Local Plan Policy HO6.

## 6.0 DESIGN AND HERITAGE

### + Design

- 6.1 The NPPF states that development should respond to local character and history and the surrounding environment and setting, whilst not preventing innovation but extends this to recognise a role for change and increased densities. The NPPF (section 16) advocates a positive strategy for conserving and enhancing the historic environment, taking account of (amongst other things) the desirability of new development to make a positive contribution to local character and distinctiveness. The NPPF states that economic, social, and environmental gains are to be sought jointly and simultaneously in order to deliver positive improvements in the quality of the built, natural, and historic environment.
- 6.2 In determining applications, Paragraph 203 of the NPPF states that LPAs should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses; the positive contribution that conservation of heritage assets can make to sustainable communities; and the desirability of new development making a positive contribution to local character and distinctiveness. Paragraph 205 requires great weight to be given to an asset's conservation (and the more important the asset, the greater the weight should be) when considering the impact of a proposed development on the significance of a designated heritage asset, irrespective of the amount of harm.
- 6.3 Paragraph 194 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 grade II listed buildings, or grade II registered parks or gardens, should be exceptional." Paragraph 208 states that where a development proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Paragraph 209 concerns the effect of an application on non-designated heritage assets that should be considered 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."

- 6.4 Paragraph 212 states that "Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably." Paragraph 213 recognises that 'Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance'.
- 6.5 London Plan Policy DC1 states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 6.6 Local Plan Policy DC1 states that 'Development 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. In particular, development throughout the borough should be of the highest standard of design that respects local context and character and should protect and enhance the character, appearance and setting of the borough's conservation areas and its historic environment'.
- 6.7 Local Plan Policy DC4 states that 'The council will require a high standard of design in all alterations and extensions to existing buildings. These should be compatible with the scale and character of existing development, their neighbours, and their setting. In most cases, they should be subservient to the original building. Alterations and extensions should be successfully integrated into the architectural design of the existing building. In considering applications for alterations and extensions the council will consider the impact on the existing building and its surroundings and consider the following:
- a) Scale, form, height and mass;
  - b) Proportion;
  - c) Vertical and horizontal emphasis;
  - d) Relationship of solid to void;
  - e) Materials;
  - f) Relationship to existing building, spaces between buildings and gardens;
  - g) Good neighbourliness; and
  - h) The principles of accessible and inclusive design.'
- 6.8 Local Plan Policy DC8 states that the council will '...aim to protect, restore or and enhance the quality, and character, appearance and setting of the borough's conservation areas and its historic environment, including listed buildings, historic parks and gardens, buildings and artefacts of local importance and interest, archaeological priority areas and the scheduled ancient monument'. This is supported by Planning Guidance SPD Key Principle CAG3. SPD Key Principles AH1 and AH2 relate to the protection of heritage assets, and CAG3 relates to development in Conservation Areas.

#### + Site context

- 6.9 The site is occupied by the existing Pocklington Lodge development, with an L-shaped form providing frontages to both Goldhawk Road and Rylett Road. The existing development is of 3 storey massing, featuring a pitched roof and several dormer/gable features. The architecture of the building has a modest and simple detailing with yellow brick and concrete sills and contrasting brickwork sills providing main detailing to elevations. At ground floor the gable frontages within the roof detailing are replicated and serve to some articulation to key building entrances. To the rear of the site, a single storey caretakers house, again in simple detailing occupies the internal environment. The building has a dated appearance and needs some renewal/upgrade. As such, the development makes a neutral contribution to the Ravenscourt and Starch Green Conservation Area.
- 6.10 The current proposals have been subject of significant pre-application and post submission discussions with officers, particularly with regards to the design of the scheme and upgrades to the existing building.

#### + Design of proposal

- 6.11 The main works to the building relate to the roof level of the existing development, here the existing pitched roof would be demolished and replaced by contemporary 1 or 2 storey extensions which would be detailed in either brick to match the existing development: or an upper-level contrasting metal cladding. The arrangement of fenestration within both elements of the scheme has been carefully designed to align with the arrangement of within the lower levels of the building and the cladding broken up with vertical piers to give these elements richer detailing overall.
- 6.12 The new upper floors are designed to incorporate setbacks to allow for the development to provide external areas of amenity to future residents of the new units and allow for these elements to appear as being more subordinate to the main building form. This would result in a building with a 4-storey massing adjacent to existing properties to the north of Rylett Road and at a 5-storey massing to the corner of Rylett Road/Goldhawk Road and adjacent to the significant mass of properties along the prominent Goldhawk Road frontage.
- 6.13 Within the lower levels of the building, the main changes to the development relate to the inclusion of replacement windows and new entrance portals, which are designed to provide a more inclusive and accessible experience for both current and future residents. The design of the portal is also considered to provide a visual connection with the more contemporary language of the revised building crown.
- 6.14 Within the rear environment of the site, following the demolition of the existing caretaker's property, a new mews development would occupy the north-eastern corner of the site. This mews property would provide additional residential accommodation and has been designed in a simple, contemporary detailing, which could complement the extensions to the main building. The remaining space provided by the demolition of the existing building would be used to provide additional hard/soft landscaping for the enjoyment of future residents.

6.15 Overall, the design of the proposals is considered to provide a positive enhancement to the existing building, adding additional character to the development and improving its visual appearance in the prominent street scene of Goldhawk Road. As such, the proposal is considered to represent a high quality of design.

+ Heritage

6.16 Local Planning Authorities are required to identify and assess the significance of any heritage asset affected by a proposal, including by development affecting the setting of a heritage asset (para 200 of the NPPF). This assessment shall be taken 'into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal' (para 200 of the NPPF).

6.17 The heritage assets directly affected by the proposals are Ravenscourt & Starch Green Conservation Area and the setting of the locally listed, (buildings of merit) 300 - 302 Goldhawk Road. Given the modest scale of alterations and extensions proposed by the current application, proposals are not considered to have any additional impact upon other adjacent heritage assets.

6.18 The Conservation Area covers a large area, and its significance mainly relates to the development and evolution of the area around Ravenscourt Park and mix of developments found around this key open space, including a mix of Victorian and Edwardian housing. As suggested above the buildings currently occupying this site and to the west are both more modern in nature and make little contribution to significance of the Conservation Area. The locally listed, (buildings of merit) at 300-302 Goldhawk Road are attractive 4 storey villas which represent more historic typologies of development which would have been found along this stretch of Goldhawk Road.

+ Assessment of harm

6.19 The Council is required to undertake an assessment of the impact of the submitted proposals on the significance of the heritage assets.

6.20 Section 66(1) of the Listed Buildings Act applies to the determination of planning applications. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that:

'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'

6.21 Section 72 of the above Act states in relation to Conservation Area that:  
'In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'

- 6.22 Most of the proposed external and internal alterations to the existing building, although increasing the scale of the building, are considered to represent an improvement to the character of the existing building and have some beneficial impact when viewed from local townscape views. These changes would give a building of modest/neutral character a more positive and characterful appearance. As such, these extensions would be considered to have a positive impact upon the street scene and would not result in harm to the character of the Ravenscourt and Starch Green Conservation Area.
- 6.23 Similarly, considering the impact upon the adjacent locally listed, (buildings of merit) at 300 - 302 Goldhawk Road, the detailing of the extensions has been sensitively designed to be set lower than both the eaves and ridgeline of these developments, allowing the villas to remain the prominent feature in this setting. As such, the development is not considered to result in any harm to these assets.
- 6.24 Details and materials in relation to the extensions and alterations to the existing building, alongside hard/soft landscaping, will be secured by a condition.
- 6.25 Overall, subject to conditions, the proposed works, due to their design, scale, and situation, would not have any harmful impacts upon the setting of the above identified heritage assets. The development would preserve the character and appearance of the Conservation area and the special architectural or historic interest of the locally listed, (buildings of merit), and the setting of adjacent designated/non-designated heritage assets would be unaffected by proposals.
- 6.26 Officers have assessed the impact of the proposal on the heritage assets and consider that it is compliant with s.66 and s.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.
- 6.27 The proposed development is also considered acceptable in accordance with the NPPF, Policy HC1 of the London Plan and Policies DC1, DC4, and DC8 of the Local Plan and Key Principles AH1, AH2 and CAG3 of the Planning Guidance SPD.

## 7.0 NEIGHBOURING AMENITY

- 7.1 The main issues in respect of the impact on neighbouring amenity are loss of outlook and sense of enclosure; overlooking; and loss of daylight and sunlight.
- 7.2 Local Plan (2018) Policy DC2 states that all new-build development should respect the principles of good neighbourliness. Policy HO11 also requires developments to respect the following:
- Privacy enjoyed by neighbours in adjoining properties;
  - Daylight and sunlight to rooms in adjoining properties;
  - Outlook from windows in adjoining properties; and
  - The sense of openness between properties.

- 7.3 With respect to outlook/sense of enclosure, Key Principle HS6 of the Planning Guidance SPD (2018) provides further guidance. As a general rule, new development should not infringe an angle of 45 degrees from either ground level or a point 2 metres above ground level, depending on the depth of the adjoining residential rear garden:
- i) Proposals that adjoin residential properties with rear gardens less than 9 metres in length to the adjoining rear boundary, the line should be measured from a point at the rear residential boundary at ground level; or
  - ii) Proposals that have rear gardens (or distance to adjoining residential properties) of more than 9 metres in length to the rear boundary, should be measured at a height of 2 metres from ground level from a point of the adjoining boundary; or
  - iii) If any part of the proposed building extends beyond these lines, then on-site judgement will be a determining factor in assessing the impact the extension will have on the existing amenities of neighbouring properties.
- 7.4 With respect to privacy, Key Principle HS7 of the Planning Guidance SPD (2018) states that any new windows should be positioned at least 18 metres from existing habitable room windows. This will be measured by an arc of 60 degrees taken from the centre of the proposed new window, to ensure there is no loss of privacy. If this standard cannot be met, then windows should be designed to ensure that no loss of privacy will occur.

+ Daylight/Sunlight

- 7.5 The Council has regard to the guidance set out in Building Research Establishments' (BRE) Report 2022 "Site Layout Planning for Daylight and Sunlight - A guide to good practice". This guidance is used as aid to prevent and/or minimise the impact of a new development on the availability of daylight and sunlight in the environs of the site. Although it provides numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design.
- 7.6 Vertical Sky Component (VSC) - VSC is a measure of the direct skylight reaching a point from an overcast sky. It is the ratio of the illuminance at a point on a given vertical plane to the illuminance at a point on a horizontal plane due to an unobstructed sky. For existing buildings, the BRE guideline is based on the loss of VSC at a point at the centre of a window, on the outer plane of the wall. The BRE guidelines state that if the VSC at the centre of a window is less than 27%, and it is less than 0.8 times its former value (i.e. the proportional reduction is greater than 20%), then the reduction in skylight will be noticeable, and the existing building may be adversely affected.
- 7.7 No-Sky Line (NSL) - NSL is a measure of the distribution of daylight within a room. It maps out the region within a room where light can penetrate directly from the sky, and therefore accounts for the size of and number of windows by simple geometry. The BRE suggest that the area of the working plane within a room that can receive direct skylight should not be reduced to less than 0.8 times its former value (i.e. the proportional reduction in area should not be greater than 20%).



7.8 Annual Probable Sunlight Hours (APSH) - In relation to sunlight, the BRE recommends that the APSH received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter. Where the proposed values fall short of these, and the absolute loss is greater than 4%, then the proposed values should not be less than 0.8 times their previous value in each period (i.e. the proportional reductions should not be greater than 20%).

7.9 The applicant's Daylight and Sunlight report which has been carried out in line with BRE considers the potential impacts of the proposed development on daylight, sunlight and overshadowing on the following residential properties:

The full list of assessed properties is as follows;

- o John Betts House
- o 1 Rylett Road
- o 3 Rylett Road
- o 2 Rylett Road
- o 2b Rylett Road
- o 302 Goldhawk Road
- o 299-301 Goldhawk Road
- o 307-309 Goldhawk Road
- o Vitae Apartments

+ John Betts House, Rylett Road

7.10 John Betts House is a 2/3 storey residential flatted building on the west side of Rylett Road. The submitted Daylight and Sunlight Report indicates that all of the relevant windows/rooms tested would comply with BRE guidelines for Vertical Sky Component (VSC). Of the 44 rooms tested, 9 of those (20.4%) would fail to comply with the BRE No-Sky Line test. All nine rooms would retain NSL levels of between 55% - 73% which is considered high for an urban location such as this. Officers consider that the number of exceedances and the level to which the properties would be impacted is within acceptable limits, and that the public benefits to providing additional specialist accommodation on this site would outweigh any harm identified. For sunlight, none of the relevant windows tested would infringe the BRE guidance for Annual Probable Sunlight Hours.

7.11 In terms of outlook, it is considered that the separation distance between Pocklington Lodge and John Betts House is sufficient to ensure that the additional height and bulk on the application site would not result in a significantly increased sense of enclosure or loss of outlook. The proposed new flat windows on the additional floors facing John Betts House would be no closer than existing windows on the lower floors. Given they would also be at least two storeys higher than the uppermost windows on John Betts House, Officers are satisfied there would be no loss of privacy or overlooking for residents of John Betts House.

+ 2 and 2B (The Folly) Rylett Road

7.12 No. 2 Rylett Road is a detached, two-storey Victorian villa immediately to the north of Pocklington Lodge, with the two buildings separated by about 5 metres. 2B Rylett Road ('The Folly') is located at the end of No. 2's rear garden, to the north east of the main Pocklington Lodge building. Of the 37 windows/ rooms tested on both of these properties, there would be no infringements of the BRE guidance in terms of either daylight or sunlight. No. 2 has two side windows facing Pocklington Lodge, however, the bulk and mass of the extension would not be visible from these windows, given it is set away from the boundary, and therefore no objections are raised in terms of privacy or outlook impacts to No. 2B The Folly's principal elevation faces west, towards No.2, and therefore the additional floors would be visible from this property but only in oblique views. Considering also the separation distance, no objections are raised in terms of outlook or privacy impacts for No. 2B.

+ 300 and 302 Goldhawk Road

7.13 Nos. 300 and 302 Goldhawk are a pair of four-storey (including semi-basement level) villas adjacent to Pocklington Lodge to the east on Goldhawk Road. Both have generous rear gardens that extend northwards, adjacent to the Lodge's courtyard amenity space. The rear elevation of the existing Pocklington Lodge, although a storey lower, extends by approximately 4 metres beyond the rear elevation of No. 302. No. 302 has five windows in the side elevation of their property, facing towards the building. In total 10 windows/ rooms tested, there would be no infringements of the BRE guidance for daylight. One relevant window at No. 302 was tested for sunlight, there would be no infringements of the guidance.

7.14 In terms of the impact of the development in terms of overshadowing of adjacent gardens and amenity spaces. Both gardens of 300 and 302 Goldhawk Road would retain at least two hours of sunlight on 21 March in the proposed condition, the factor of former value, and whether the results meet the BRE numerical guidelines (i.e., at least 50% or at least 0.8 times former value). 67% to 62% and 70% to 59% respectively. Both gardens/amenity spaces assessed would satisfy the BRE guidelines for sun on ground.

7.15 Overall, the proposed development would not result in undue harm in terms of loss of daylight, sunlight and overbearing impact to the neighbouring properties. Pocklington Lodge is already a substantial building that dominates views from the garden in the direction of 300 and 302 Goldhawk Road, and Officers do not consider that there would be any significant harm caused in terms of loss of outlook or increased sense of enclosure.

+ South side of Goldhawk Road

7.16 Nos. 301-309 Goldhawk Road are on the southern side of the road directly opposite Pocklington Lodge. Given these properties are to the south of the site, and are separated by a distance of almost 30 metres, no concerns are held about the impact to these properties in terms of light, outlook, or privacy.

+ Impact on existing Pocklington Lodge residences:

- 7.17 Concern has been raised by some of the existing residents of Pocklington Lodge about the impact of creating additional flats in the building, including the stress on communal facilities (such as the common room, laundry room, and garden) if more residents were to move in. In terms of the existing internal communal facilities would still be adequate, this is a matter for the applicants, as each of the flats provides for full self-containment and provision of additional, shared facilities and spaces is not a Planning requirement.
- 7.18 As discussed above, 15 of the 19 new flats proposed include private amenity space of minimum 5sqm. Currently, shared external amenity space is provided in the form of the courtyard garden area on the north side of the building. The demolition and relocation of the rear building will result in an additional 137.1 sqm of communal amenity space and it is part of the proposal to provide a 41.4 sqm rooftop terrace. This creates approximately a total of 338.6 sqm of communal amenity space on site, roughly equating to around 4.9m<sup>2</sup> per person. The overall shared amenity area on site is increased by 102%, this is considered to be an acceptable approach given the specialist nature of the use of the site.

## 8.0 HIGHWAYS

8.1 Local Plan (2018) Policy T1 sets out the council's high-level borough wide targets for transport, including (amongst other things):

- Promoting and supporting the continued development of initiatives designed to encourage modal shift away from private vehicles, in order to improve congestion and air quality within the borough;
- Developing and promoting safe environments for cyclists and pedestrians to encourage residents and businesses to consider these modes; and
- Ensuring that traffic generated by new development is minimised so that it does not add to parking pressure on local streets or congestion or worsen local air quality.

8.2 Local Plan (2018) Policy T2 requires that all development proposals be assessed for their contribution to traffic generation and their impact on congestion, particularly on bus routes and on the primary route network. The council will require a Transport Assessment (TA), together with a Travel Plan where a development is anticipated to generate a level of trips that impacts on the local network or have an impact on any strategic routes. Delivery and servicing plans should also be secured and co-ordinated with travel plans.

8.3 Local Plan (2018) Policy T3 makes clear that opportunities for cycling and walking will be promoted; with developments required to provide convenient, safe, and secure cycle parking within the boundary of the site as well as suitable changing and showering facilities; as well as contributions to improve cycle hire schemes where necessary. With regards to car parking, Policy T4 states that all new development will have to conform to the council's vehicle parking standards; including parking for blue badge holders and provision of electric parking bays.

- 8.4 The site is located on a mainly residential area with Stamford Brook Underground Station a short 0.3 miles (7 minute walk) from the application site serving the District Line. In addition, the site is served by bus routes 293 and 94 with bus stops located along Goldhawk Road. A local parade containing services and shops is located on the junction of Askew Road and Goldhawk Road. Therefore, the overall accessibility of the site is considered to be very good.
- 8.5 A Transport Statement was submitted with the application. Given the nature of the residents at the site, it is anticipated that the vast majority of trips to and from the site will be undertaken by walking or by public transport. It is considered that the demand for car parking and cycle parking for residents will be very low and car and cycle parking facilities would be used mainly by visitors, contractors visiting the site for maintenance works, etc. As such, the proposals would involve reducing the number of usable car parking spaces on site from four to two (mainly for the purposes of maintenance contractor vehicles to be used on an as needed basis).
- 8.6 Given the above, and the good public transport accessibility and cycle provision in the area, it is unlikely that there would be overspill parking generated by the proposals. In the case that there is demand for more car parking for visitors than provided, pay and display (or pay by phone) car parking bays are available on Rylett Road, directly outside the site. Moreover, during the course of the application car parking arrangements were amended to remove the disabled car parking space shown fronting Rylett Road as this did not comply with the required standards for accessible car parking spaces. Given the site entrance is in close proximity to the pay and display car parking bays available on Rylett Road. Residents who need to be dropped or picked up can easily do so from this location. This has the added benefit of consolidating the refuse and recycling arrangements in one place as the hardstanding is no longer required for car parking.
- 8.7 Vehicular and pedestrian access points are proposed to be maintained as existing. Refuse storage is proposed to be formalised, with bin stores located in the north-western corner of the site, to minimise the distance that refuse will need to be carried from the units to the refuse stores. The north-western store will be collected from Rylett Road, and refuse collection arrangement will remain as existing. The capacity of the bin store has been increased to provide better arrangements for existing residents and cater to the increase in residents.
- 8.8 Cycle parking is proposed to be improved, with four visitor cycle parking spaces proposed adjacent to the Rylett Road pedestrian access, and five long-stay cycle parking spaces (including one for a larger bicycle) provided in the eastern part of the site. It is unlikely that any residents will be able to cycle, so a reduction in cycle parking provision from London Plan standards has been considered appropriate.

8.9 Residents have raised concerns that the addition of 16 net additional flats will lead to an increase in the number of visitors' cars causing congestion and parking stress on Rylett Road. Although the site has a low PTAL score of 2-3 according to TfL's methodology, it is still accessible by two buses from Central London/ Shepherd's Bush as well as Stamford Brook Underground Station which is less than 10 minutes' walk from the site. A condition is attached for a staff/visitor Travel Plan to ensure that car journeys to the site are minimised as far as possible, and therefore no further objections are raised in terms of highways impact.

#### + Building Works

8.10 To manage the construction phase of the development and the associated impacts of construction traffic accessing the site, a Demolition and Construction Logistics Plan (DLP/CLP) will be secured by condition. The DLP/CLP will include details of the anticipated number of construction vehicles associated with the development of the site, the duration of the works, how the site will be managed and how construction traffic will be managed in terms of arrivals and routeing. The DLP/CLP and associated monitoring fees can also be included within the legal agreement, and will remain live a document with ongoing consultation with the Council's Highways Officers.

8.11 In summary, there are no objections to the proposal based on highways, traffic or parking. Subject to the outlined conditions and legal obligations the proposal accords with the above policies.

#### 9.0 AIR QUALITY

9.1 London Plan Policy SI 1 states that development proposals should not lead to deterioration of existing poor air quality, create any new areas that exceed air quality limits or create unacceptable risk of high levels of exposure to poor air quality.

9.2 Local Plan Policies CC1 and CC10 seek to reduce levels of local air pollution and improve air quality in line with the national air quality objectives by reducing the potential adverse air quality impacts of new developments, requiring the submission of an air quality assessment and mitigation measures where appropriate. These are supported by Planning Guidance SPD Key Principles AQ1 to AQ5.

9.3 The development site is located within the councils Air Quality Management Area (AQMA), and an area of existing poor air quality due to the road traffic emissions from Goldhawk Road (A402). The development proposal will introduce new residential receptors into an area of very poor air quality.

9.4 The demolition/construction activities and the operational phase of the development have the potential to contribute to a worsening of local air quality, unless appropriate steps are taken to prevent it. Accordingly, an Air Quality Assessment has been submitted with the application to assesses the development's potential impacts on local air quality taking into account of the potential temporary impacts during the demolition and construction phase and the operational impacts caused by increase in traffic flows and emissions from the plant on the site. The assessment has been reviewed by the Council's Air Quality Officer. Further details are required by conditions, including the submission of Air Quality Dust Management Plans (Demolition and Construction phases); a Ventilation Strategy and post installation compliance report; details of the installation of Zero Emission MCS Certified Air/Water Source Heat Pumps and Electric Boilers for residential and non-residential uses; the submission of a Delivery and Servicing Plan. A payment of £3,000 per year of the demolition and construction phases of the development for the council's compliance monitoring of the AQDMP and to maintain the councils Construction Site Monitoring Register Website will be secured by a s.106 agreement.

## 10.0 FLOOD RISK AND SUSTAINABLE DRAINAGE

10.1 The site is within the Environment Agency's Flood Zone 3. A Flood Risk Assessment (FRA) has been provided. Most of the new units being created are at roof level and would not be at risk of flooding due to their location. No further information is required in relation to flood risk for these flats. There are 2 new ground floor units being provided. Although in Flood Zone 3, the site is well protected from flood risk from the River Thames due to the presence of the Thames Barrier and other defences such as river walls. The main potential flood risk to the site would be surface water during a major storm event. Surface water modelling maps show that the site is low risk, although there could be some ponding in the car park area. This part of the site will be redeveloped as part of the proposals and sustainable drainage measures are included which will help to reduce these risks.

10.2 It is noted that as part of the re-development, it is proposed to incorporate green roofs to the extension to the existing building (600m<sup>2</sup>). For the new building, a blue/green roof is proposed covering an area of 120m<sup>2</sup>. Discharges of surface water will be limited to 1 l/s for all storm events up to the 1 in 100 year event, taking account of climate change (by applying a factor of +40%). It is also proposed to include permeable paving in the new car parking areas (100m<sup>2</sup>). These SuDS measures will help provide a significant reduction in runoff compared to the existing situation, attenuating flows to the sewer of between 90-97%. Rainwater harvesting does not appear to have been considered though and this is at the top of the Drainage Hierarchy and should be included where possible. It may be possible to collect rainwater for re-use for irrigation of the soft landscaping around some of the site, so this should be explored further.

10.3 Conditions are attached to ensure the development complies with the FRA including the use of permeable paving and blue/green roof. Overall, subject to the conditions and obligations recommended above, no objection would be raised under London Plan Policy SI 1 and Local Plan Policies CC1 and CC10 on air quality grounds.

## 11.0 ENERGY EFFICIENCY AND SUSTAINABILITY

- 11.1 An Energy and Sustainability Assessment has been submitted with the application. The scheme is a major development and therefore the inclusion of sustainable design and construction measures, including carbon reduction measures, is required. An Energy and Sustainability Statement has been provided with the application.
- 11.2 The Energy Assessment shows that an overall reduction in CO<sub>2</sub> emissions for the scheme of 82% is achieved. This is well beyond the 35% target in the London Plan and the GLA's benchmark expectation for major residential schemes of at least a 50% reduction. In order to achieve net zero carbon, a payment in lieu of £6,692 will be required, which can be included as part of the s106 Agreement. The calculations show that all of the CO<sub>2</sub> savings come from the use of on-site renewable energy.
- 11.3 The final approach is not yet decided though, and it is stated that although the preferred solution is outlined in the Energy Strategy with regards to the use of Heat Pumps, it is stated that the options will be reviewed again at detailed design stage. It is explained that any selected option will remain policy compliant with regards to meeting the CO<sub>2</sub> emissions targets. As well as heat pumps, solar PV panels are also proposed. The proposed approach is for the new roof level flats not to connect to the communal heating network, but to use individual hot water heat pumps. The mews block will be treated differently and have its own air source heat pump providing heating and hot water. The scheme will also use LED lighting, include heat recovery on the ventilation systems and have a better airtightness performance than required.
- 11.4 In order to make the proposal 'zero carbon' it is proposed to make a payment in lieu of approximately £6,692. In broad terms, the approach outlined is acceptable, however it is noted that the specification used for the energy use and CO<sub>2</sub> calculations is only indicative. Detailed specifications for each unit would be produced at detailed design stage. If the application were to be acceptable in other respects, then a condition could be attached for a revised energy assessment, and a legal agreement signed to ensure the payment in lieu.
- 11.5 With regard to broader sustainability issues, some information is provided on issues such as materials, waste, biodiversity, water use and flood risk. The approach outlined is generally acceptable, however if the application were acceptable in all other respects then a condition would be attached requiring further details, to secure compliance with Local Plan Policies CC3 and CC4.

## 12.0 FIRE STRATEGY

- 12.1 London Plan Policy D12 requires development proposals to achieve the highest standards of fire safety, embedding these at the earliest possible stage. Part (b) states that all major development proposals should be submitted with a Fire Statement, that shows how the proposals respond to and contain information on the requirements of both parts A and B of London Plan Policy D12.

12.2 A Fire Statement prepared by CHPK Fire Engineering accompanies this application to confirm the suitability of the proposal in terms of Fire Safety, compliance with Part B of Building Regulations 2010 and London Plan Policy D12. The report concludes that the proposed development will be compliant with Policy D12.

### 13.0 LAND CONTAMINATION

13.1 Local Plan Policy CC9 states that the Council will support the remediation of contaminated land and that it will take measures to minimise the potential harm of contaminated sites and ensure that mitigation measures are put in place. The Policy requires applicants to carry out site assessment and submit a report of findings on sites where contamination is known to be present, to establish the nature and extent of contamination.

13.2 Potentially contaminative land uses (past or present) have been identified at, and or, near to this site, and the proposal would introduce uses that are vulnerable to potential contamination. Therefore, to ensure that no unacceptable risks are caused to humans, controlled waters, or the wider environment during and following the development works conditions are attached covering the assessment and remediation of contaminated land.

13.3 Subject to the conditions recommended above, no objection would be raised under Local Plan Policy CC9 on land contamination grounds.

### 14.0 ECOLOGY AND BIODIVERSITY

14.1 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, based on Urban Greening Factors set out in Table 8.2 of the London Plan. Where Local Plans do not have UGF scores, the London Plan UGF identifies scores of 0.4 for predominately residential developments and 0.3 for predominately commercial developments should be applied.

14.2 London Policy G7 states that existing trees of quality should be retained wherever possible or replaced where necessary. New trees are generally expected in new development, particularly large-canopied species.

14.3 Local Plan Policies OS1 and OS5 seek to enhance biodiversity and green infrastructure in LBHF by (inter alia) maximising the provision of gardens, garden space and soft landscaping, and seeking green and brown roofs and planting as part of new development; seeking retention of existing trees and provision of new trees on development sites; and adding to the greening of streets and the public realm.



14.4 An Arboricultural Report prepared by Silva Arboriculture Ltd accompanies this application and confirms that to facilitate the design footprint one Category C individual tree (T1) and one tree from a Category C group of trees (G5) will need to be removed. Both trees are located within the redline application boundary and have no public amenity.

14.5 The report goes on to state that the removal of the tree (G5) within the group of category C group of trees will not have a detrimental impact on the root protection areas (RPA) of other trees on the group, as the proposed tree to be removed is a good distance from the other trees in the group. The removal of the tree is required in order to install a new store which will be located within the RPA, notwithstanding, it is proposed that a no-dig surface is used to ensure that roots are not disturbed.

14.6 It is part of the proposal that the application will provide an enhanced communal amenity area with new landscaping, trees and planting within the courtyard. Soft and hard landscaping and planting will have significant benefits to the current and future occupiers of the site and the wider area. In addition, the proposed scheme provides private amenity space for 15 of the 19 proposed new units in the form of terraces. The proposed scheme includes sedum roofs and green/blue roofs totalling 720m<sup>2</sup>, this is made up of 600m<sup>2</sup> on the main building and 120m<sup>2</sup> on the mews building. Landscaping and management details to be provided by condition.

14.7 The proposal seeks to protect and retain existing trees on site while providing an overall improvement in Urban Greening Factor (UGF).

#### 15.0 PLANNING OBLIGATIONS / COMMUNITY INFRASTRUCTURE LEVY (CIL)

+ Mayoral and Local CIL

15.1 The Mayor's CIL (Community Infrastructure Levy) came into effect in April 2012 and new fee rates came into effect in April 2019. This would contribute towards the funding of Crossrail. The GLA expect the Council, as the Collecting Authority, to secure the levy in accordance with London Plan Policy DF1. This development would be subject to a London wide community infrastructure levy. This development is liable for an estimated Mayoral CIL of £50,760.00 (plus indexation).

15.2 The Council's Community Infrastructure Levy (CIL) is also a charge levied on the net increase in floorspace arising from development in order to fund infrastructure that is needed to support development in the area. The CIL Charging Schedule was presented to Council and approved 20 May and has formally taken effect since the 1st September 2015. This development is liable for an estimated local CIL of £74,700.00 (plus indexation).

+ S106 Heads of Terms

- 15.3 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'.
- 15.4 London Plan Policy DF1 (Delivery of the Plan and Planning Obligations) states that: "Development proposals should provide the infrastructure and meet the other relevant policy requirements necessary to ensure that they are sustainable and to support delivery of the Plan.
- 15.5 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).
- 15.6 The planning obligations set out in the heads of terms below are considered necessary to make the development acceptable in planning terms, they are related to the development and fairly and reasonable in scale and kind to the development. A Section 106 agreement is therefore required to ensure the proposal is in accordance with the statutory development plan and to secure the necessary infrastructure to mitigate the needs of the Proposed Development.
- 15.7 In view of the fact the Section 106 agreement will be the subject of extended negotiations, officers consider that circumstances may arise which may result in the need to make minor modifications to the conditions and obligations (which may include the variation, addition, or deletion). Accordingly, the second recommendation has been drafted to authorise the Director of Planning and Property, after consultation with the Assistant Director Legal Services and the Chair of the Planning and Development Control Committee, to authorise the changes they consider necessary and appropriate, within the scope of such delegated authority.
- 15.8 The Applicant is expected to agree to enter into a legal agreement with the Council to which would include the following site-specific items (i.e. items which are not on the CIL r123 list):
- 1) Energy and Sustainability - carbon dioxide emission offset contribution of £6,692.
  - 2) Air Quality - £3,000 per annum for the demolition and construction phases of the development will be required for the Council's compliance monitoring of the AQDMP and to maintain the councils Construction Site Monitoring Register Website.
  - 4) Demolition and Construction Logistics Plans - submission; and a contribution of £5,000 per year until completion of construction towards monitoring.

5) Car Permit Free - To prohibit any occupiers of the 19 new residential units, other than Blue Badge Holders, from obtaining a parking permit, under Section 16 of the Greater London Council (General Powers) Act 1974.

6) Travel Plan - submission and implementation of an approved Residents Travel Plan. A contribution of £3,000 at yr 1, 3 and 5 towards Travel Plan monitoring.

7) Clause/s to ensure that the new units will only be occupied by blind and visually impaired people and not available as open market housing.

## 16.0 CONCLUSION

16.1 In considering planning applications, the Local Planning Authority needs to consider the development plan as a whole and planning applications that accord with the development plan should be approved without delay, unless material considerations indicate otherwise and any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

16.2 In the assessment of the application regard has been given to the NPPF, London Plan, Publication London Plan, and Local Plan policies as well as guidance.

16.3 In summary, the proposed upward extension of the existing residential facility for blind and visually impaired people and intensification of use is acceptable in land use terms. The proposed development would contribute towards the quantity of the borough's specialise housing stock. The proposal is acceptable in visual terms and is considered to be of a good quality of design which would not adversely impact upon the setting of the nearby Conservation Area. Subject to conditions the proposal would not result in unacceptable impacts upon the amenities of neighbouring residential properties. The new residential units comply the relevant standards and provide a good quality of accommodation for the new occupants. Highways, transportation and environmental matters including energy and sustainability, flood risk, air quality, land contamination, and ecology and biodiversity have also been satisfactorily addressed and will be subject to conditions and a legal agreement. In these respects, the proposals comply with the relevant policies of the NPPF (2023), the London Plan (2021), the Local Plan (2018) and the relevant Key Principles within the Planning Guidance Supplementary Planning Document (2018).

16.4 Officers have taken account of all the representations received and in overall conclusion for the reasons detailed in this report it is considered, having regard to the development plan as a whole and all other material considerations, that planning permission should be granted subject to the conditions listed, and the completion of a s106 agreement.

16.5 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.

## 17.0 RECOMMENDATION

17.1 The application is therefore recommended for approval, subject to the recommendations above.