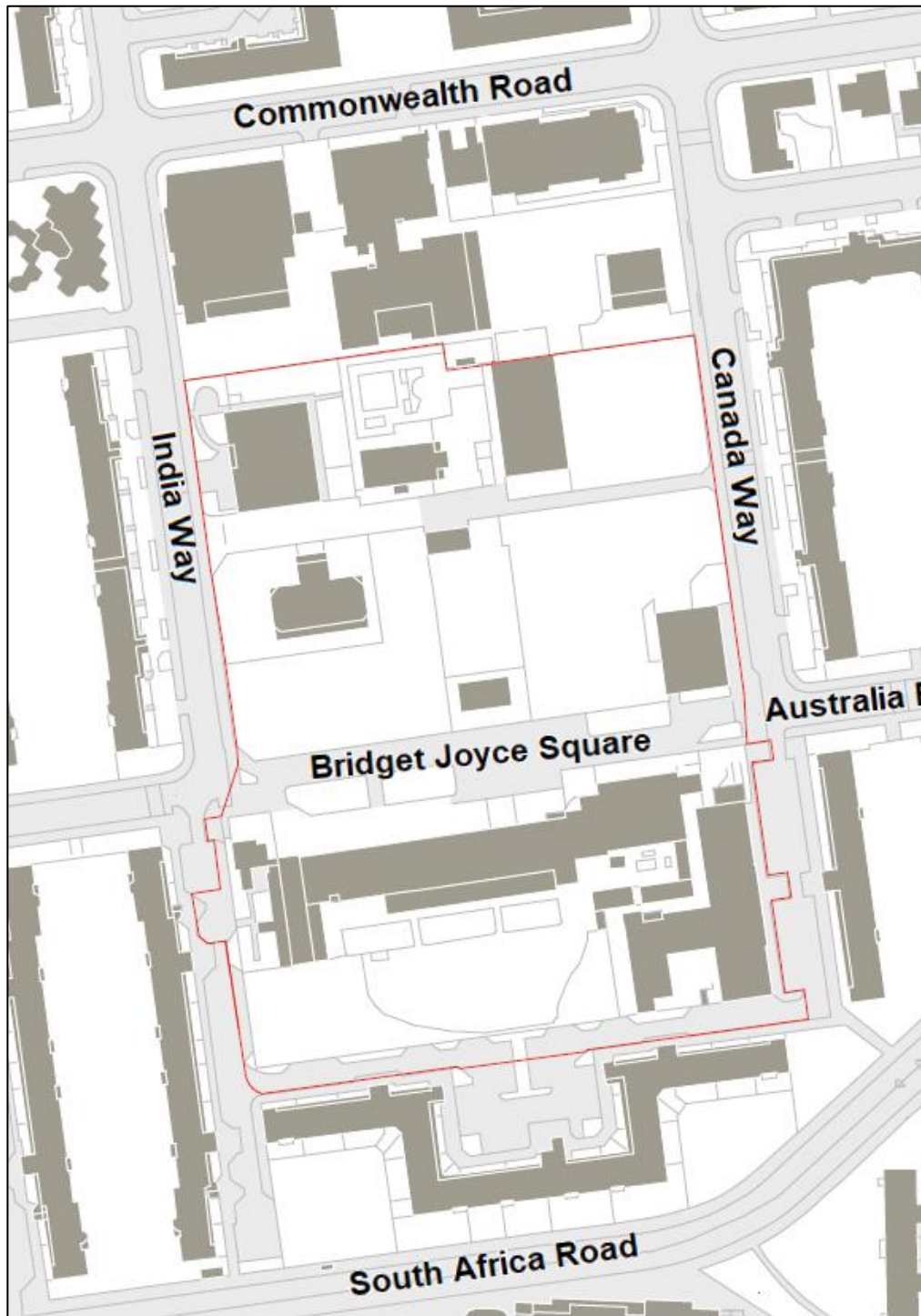

Ward: White City

Site Address:

White City Central, White City Estate, London, W12



For identification purposes only - do not scale.

Reg. No:

2024/01938/FR3

Case Officer:

Jacques Du Plessis

Date Valid:

02.08.2024

Conservation Area:

N/A

Committee Date:

02.04.2025

Applicant:

Hammersmith & Fulham Council
C/o Agent

Description:

Demolition of existing buildings and the redevelopment of the site with the erection of 8 new buildings ranging from 1 to 6 storeys to provide 253 residential units (Use Class C3), a new children's day nursery (Use Class E) and a new community centre (Use Class F), with associated refuse storage, cycle parking and Blue Badge car parking, together with the provision of an all-weather games pitch, outdoor children's play facilities, and new hard and soft landscaped public open space. The proposals include the erection of a temporary community centre building (Use Class F).

Drg. Nos: See Condition No.2

Application Type:

Full Regulation 3 - LBHF is Developer

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29.0 CONCLUSION AND RECOMMENDATION

Officer Recommendation:

- 1) That the Committee resolve that the Director of Planning and Property be authorised to grant permission subject to the conditions listed below (as amended or varied in accordance with 2) below) and subject to the completion of a Memorandum of Understanding dealing with the matters set out in Section 28.0 of this Report.
 - 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 changes to the conditions listed below, which may include the amendment, addition or deletion of conditions.
 - 3) 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 finalise the Memorandum of Understanding to deal with the matters set out in Section 28 below.
-

CONDITIONS

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

Time Limit

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

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

Drawings

- 2) The development hereby permitted shall be constructed in accordance with the approved drawings marked.

2001-MAE-SW-ZZ-DR-A-04001 P01; 2001-MAE-SW-ZZ-DR-A-04100 P01
2001-MAE-SW-ZZ-DR-A-04200 P01; 2001-MAE-SW-ZZ-DR-A-04300 P01
2001-MAE-SW-ZZ-DR-A-04301 P01; 2001-MAE-SW-ZZ-DR-A-04302 P01
2001-MAE-SW-00-DR-A-05100 P01; 2001-MAE-SW-00-DR-A-05101 P03
2001-MAE-SW-00-DR-A-05102 P02; 2001-MAE-SW-00-DR-A-06100 P02
2001-MAE-SW-01-DR-A-06101 P02; 2001-MAE-SW-02-DR-A-06102 P02
2001-MAE-SW-03-DR-A-06103 P02; 2001-MAE-SW-04-DR-A-06104 P02
2001-MAE-SW-05-DR-A-06105 P02; 2001-MAE-SW-06-DR-A-06106 P02
2001-MAE-SW-07-DR-A-06107 P02; 2001-MAE-SW-ZZ-DR-A-06200 P01
2001-MAE-SW-ZZ-DR-A-06300 P01; 2001-MAE-SW-ZZ-DR-A-06301 P01
2001-MAE-SW-ZZ-DR-A-06302 P01; 2001-MAE-BB-00-DR-A-06100 P02
2001-MAE-BB-00-DR-A-06101 P02; 2001-MAE-BB-01-DR-A-06102 P02
2001-MAE-BB-01-DR-A-06103 P02; 2001-MAE-BB-02-DR-A-06104 P02
2001-MAE-BB-02-DR-A-06105 P02; 2001-MAE-BB-RF-DR-A-06106 P02
2001-MAE-BB-RF-DR-A-06107 P02; 2001-MAE-BB-RF-DR-A-06108 P02
2001-MAE-BC-00-DR-A-06100 P02; 2001-MAE-BC-01-DR-A-06101 P02
2001-MAE-BC-02-DR-A-06102 P02; 2001-MAE-BC-03-DR-A-06103 P02
2001-MAE-BC-04-DR-A-06104 P02; 2001-MAE-BC-RF-DR-A-06105 P02
2001-MAE-BD-00-DR-A-06100 P02; 2001-MAE-BD-01-DR-A-06101 P02
2001-MAE-BD-02-DR-A-06102 P02; 2001-MAE-BD-03-DR-A-06103 P02
2001-MAE-BD-04-DR-A-06104 P02; 2001-MAE-BD-RF-DR-A-06105 P02
2001-MAE-BE-00-DR-A-06100 P02; 2001-MAE-BE-01-DR-A-06101 P02
2001-MAE-BE-03-DR-A-06103 P02; 2001-MAE-BE-05-DR-A-06105 P02
2001-MAE-BE-RF-DR-A-06106 P02; 2001-MAE-BF-00-DR-A-06100 P02
2001-MAE-BF-01-DR-A-06101 P02; 2001-MAE-BF-03-DR-A-06103 P02
2001-MAE-BF-05-DR-A-06105 P02; 2001-MAE-BF-RF-DR-A-06106 P02

2001-MAE-BG-00-DR-A-06100 P02; 2001-MAE-BG-01-DR-A-06101 P02
2001-MAE-BG-03-DR-A-06103 P02; 2001-MAE-BG-04-DR-A-06104 P02
2001-MAE-BG-RF-DR-A-06105 P02; 2001-MAE-BB-ZZ-DR-A-06200 P01
2001-MAE-BB-ZZ-DR-A-06201 P01; 2001-MAE-BC-ZZ-DR-A-06200 P01
2001-MAE-BD-ZZ-DR-A-06200 P01; 2001-MAE-BE-ZZ-DR-A-06200 P01
2001-MAE-BE-ZZ-DR-A-06201 P01; 2001-MAE-BF-ZZ-DR-A-06200 P01
2001-MAE-BF-ZZ-DR-A-06201 P01; 2001-MAE-BG-ZZ-DR-A-06200 P01
2001-MAE-BB-ZZ-DR-A-06300 P01; 2001-MAE-BB-ZZ-DR-A-06301 P01
2001-MAE-BB-ZZ-DR-A-06302 P01; 2001-MAE-BB-ZZ-DR-A-06303 P01
2001-MAE-BB-ZZ-DR-A-06304 P01; 2001-MAE-BC-ZZ-DR-A-06300 P01
2001-MAE-BC-ZZ-DR-A-06301 P01; 2001-MAE-BD-ZZ-DR-A-06300 P01
2001-MAE-BD-ZZ-DR-A-06301 P01; 2001-MAE-BE-ZZ-DR-A-06300 P01
2001-MAE-BE-ZZ-DR-A-06301 P01; 2001-MAE-BE-ZZ-DR-A-06302 P01
2001-MAE-BF-ZZ-DR-A-06300 P01; 2001-MAE-BF-ZZ-DR-A-06301 P01
2001-MAE-BF-ZZ-DR-A-06302 P01; 2001-MAE-BG-ZZ-DR-A-06300 P01
2001-MAE-BG-ZZ-DR-A-06301 P01; 2001-MAE-BB-ZZ-DR-A-22400 P01
2001-MAE-BD-ZZ-DR-A-22401 P01; 2001-MAE-BD-ZZ-DR-A-22402 P01
2001-MAE-CH-00-DR-A-06100 P02; 2001-MAE-CH-01-DR-A-06101 P02
2001-MAE-CH-02-DR-A-06102 P02; 2001-MAE-CH-RF-DR-A-06103 P02
2001-MAE-CH-ZZ-DR-A-06200 P01; 2001-MAE-CH-ZZ-DR-A-06201 P01
2001-MAE-CH-ZZ-DR-A-06300 P01; 2001-MAE-CH-ZZ-DR-A-06301 P01
2001-MAE-CH-ZZ-DR-A-06302 P01; 2001-MAE-CH-ZZ-DR-A-22401 P01
2001-MAE-CH-ZZ-DR-A-22402 P01; 2001-MAE-CH-ZZ-DR-A-22403 P01
2001-MAE-NU-00-DR-A-06100 P01; 2001-MAE-NU-01-DR-A-06101 P01
2001-MAE-NU-02-DR-A-06102 P02; 2001-MAE-NU-RF-DR-A-06103 P02
2001-MAE-NU-ZZ-DR-A-06200 P01; 2001-MAE-NU-ZZ-DR-A-06201 P01
2001-MAE-NU-ZZ-DR-A-06202 P01; 2001-MAE-NU-ZZ-DR-A-06300 P01
2001-MAE-NU-ZZ-DR-A-06301 P01; 2001-MAE-NU-ZZ-DR-A-22401 P01
2001-MAE-NU-ZZ-DR-A-22402 P01;

1263_P0101; 1263_P0102; 1263_P0103; 1263_P0160; 1263_P0161

776-FH-XX-00-DP-L-102 P2; 776-FH-XX-00-DP-L-201 P2
776-FH-XX-00-DP-L-202 P2; 776-FH-XX-00-DP-L-402 P2
776-FH-XX-00-DP-L-403 P2; 776-FH-XX-00-DP-L-404 P1
776-FH-XX-00-DP-L-406 P1; 776-FH-XX-00-DP-L-407 P2
776-FH-XX-00-DP-L-501 P2; 776-FH-XX-00-DP-L-502 P2
776-FH-XX-00-DP-L-503 P2; 776-FH-XX-00-DP-L-801 P2
776-FH-XX-00-DP-L-802 P2; 776-FH-XX-00-DP-L-904 P1
776-FH-XX-01-DP-L-100 P1.

Reason: To ensure full compliance with the planning application hereby approved and to prevent harm arising through deviations from the approved plans, in accordance with Policies D1, D2, D3, D4, D5, D8, D9, D11, D12, D13, HC1, HC3, HC4 and G7 of the London Plan (2021), and Policies DC1, DC2, DC3, DC7, DC8 and DC9 of the Local Plan (2018).

Community Liaison Group

- 3) Prior to commencement of the development hereby permitted, a Community Liaison Group shall be established and maintained for the duration of the construction works hereby approved, having the purpose of:

- a. informing nearby residents and businesses of the building programme and progress of demolition and construction works for each phase of the development.
- b. informing nearby residents and businesses of appropriate mitigation measures being undertaken as part of each phase of the development.
- c. informing nearby residents and businesses of considerate methods of working such as working hours and site traffic.
- d. providing advanced notice of exceptional hours of work, if and when appropriate.
- e. providing nearby residents and businesses with an initial contact for information relating to the works and procedures for receiving/responding to comments or complaints regarding the development with the view of resolving any concerns that might arise.
- f. providing telephone contacts for nearby residents and businesses 24 hours daily throughout the works for the development; and
- g. producing a leaflet prior to the commencement of the development for distribution to nearby residents and businesses, identifying progress of the development and which shall include an invitation to register an interest in the Liaison Group.

The terms of reference for the Community Liaison Group shall be submitted to the Local Planning Authority for approval prior to commencement of any works on site. The Community Liaison Group shall meet at least once every quarter until completion of the development.

Reason: To ensure satisfactory communication with residents, businesses, and local stakeholders throughout the construction of the development, in accordance with the Policies CC10, CC11, CC12, CC13, DC2, and T7 of the Local Plan (2018).

Building Contract

- 4) No demolition works hereby permitted shall be undertaken before:

- a. A building contract for the redevelopment of the site for the Nursery, Community Centre and the housing development hereby permitted has been entered into; and
- b. Notice of demolition in writing and a copy of the signed building contract has been submitted to the Local Planning Authority.

Reason: To ensure that the public benefits are delivered, and demolition does not take place prematurely, in accordance with Policy DC1 of the Local Plan (2018).

Phasing

- 5) No development shall commence until a final phasing plan showing the location of all development phases plus the programme of phasing, including any sub-phases of development and including the completion of the public realm works has been submitted to and approved by the Local Planning Authority. Development shall proceed in accordance with the approved phasing strategy.

Reason: To ensure that the development is carried out in a comprehensive, orderly manner, and within a reasonable timescale for the benefit of the existing and future occupiers of the development and other occupiers of the surrounding area and to assist with the identification of each chargeable development (being the Phase) and the calculation of the amount of CIL payable in respect of each chargeable development in accordance with the Community Infrastructure Levy Regulations 2010 (as amended).

CONTAMINATED LAND

Preliminary Risk Assessment Report

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

Reason: Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. The 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, and in accordance with Policy SD1 of the London Plan (2021), Policies CC5, CC8, CC9 and CC11 of the Local Plan (2018) and SPD Key Principles LC1 to LC7 (2018).

Site Investigation Scheme

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

Reason: Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. The 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, and in accordance with Policy SD1 of the London Plan (2021), Policies CC5, CC8, CC9 and CC11 of the Local Plan (2018) and SPD Key Principles LC1 to LC7 (2018).

Quantitative Risk Assessment Report

- 8) No development within a Phase (other than development which the Local Planning Authority has agreed in writing under Condition 6 and/or Condition 7 that needs to take place for this report to be produced) shall commence until a quantitative risk assessment report has been submitted to and approved in writing by the Local Planning Authority.

This report shall: assess the degree and nature of any contamination identified on the site through the site investigation; include a revised conceptual site model from the preliminary risk assessment based on the information gathered through the site investigation to confirm the existence of any remaining pollutant linkages and determine the risks posed by any contamination to human health, controlled waters and the wider environment. All works must be carried out in compliance with and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Reason: Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. The 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, and in accordance with Policy SD1 of the London Plan (2021), Policies CC5, CC8, CC9 and CC11 of the Local Plan (2018) and SPD Key Principles LC1 to LC7 (2018).

Remediation Method Statement

- 9) No development within a Phase (other than development which the Local Planning Authority has agreed in writing under Condition 6 and/or Condition 7 that needs to take place for this statement to be produced) shall commence until, a remediation method statement has been submitted to and approved in writing by the Local Planning Authority. This statement shall detail any required remediation works and shall be designed to mitigate any remaining risks identified in the approved quantitative risk assessment. All works must be carried out in compliance with and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Reason: Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. The 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, and in accordance with Policy SD1 of the London Plan 2021, Policies CC5, CC8, CC9 and CC11 of the Local Plan (2018) and SPD Key Principles LC1 to LC7 (2018).

Verification Report

- 10) No development within a Phase (other than development which the Local Planning Authority has agreed in writing under Condition 6 and/or Condition 7 that has to take place for this statement to be produced) shall commence until the work set out in 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 Local Planning Authority. This report shall include the following: Details of the remediation works carried out; results of any verification sampling, testing or monitoring including the analysis of any imported soil; all waste management documentation showing the classification of waste, its treatment, movement and disposal; and the validation of gas membrane placement.

If, during development, contamination not previously identified is found to be present at the site, the Local Planning Authority is to be informed immediately and no further development (unless otherwise agreed in writing by the Local Planning Authority) shall be carried out until a report indicating the nature of the contamination and how it is to be dealt with is submitted to, and agreed in writing by, the Local Planning Authority. Any required remediation shall be detailed in an amendment to the remediation statement and verification of these works included in the verification report. All works must be carried out in compliance with and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Reason: Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. The 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, and in accordance with Policy SD1 of the London Plan (2021), Policies CC5, CC8, CC9 and CC11 of the Local Plan (2018) and SPD Key Principles LC1 to LC7 (2018).

Onward Long-Term Monitoring Methodology Report

- 11) No development within a Phase (other than development which the Local Planning Authority has agreed in writing under Condition 6 and/or Condition 7 that has to take place for this statement to be produced) shall commence until an onward long-term monitoring methodology report has been submitted to and approved in writing by the Local Planning Authority, to deal with cases where further monitoring is required after the completion of development works to verify the success of the remediation undertaken. All works must be carried out in compliance with and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Reason: Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. The 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, and in accordance with Policy SD1 of the London Plan (2021), Policies CC5, CC8, CC9 and CC11 of the Local Plan (2018) and SPD Key Principles LC1 to LC7 (2018).

CONSTRUCTION

Demolition, Ground and Enabling Works

- 12) Prior to the commencement of any demolition, ground and/or enabling works for each phase of the development, final details of the demolition, ground and/or enabling works shall be submitted to and approved in writing by the Local Planning Authority (any such works approved under this Condition 12 are referred to in other conditions as "Demolition, Ground and Enabling Works"). The enabling works shall proceed in accordance with the approved details.

Reason: To ensure that the development is carried out in a satisfactory manner in accordance with Policies DC1, and CC2 of the Local Plan (2018).

Hoardings

- 13) Prior to commencement of Demolition, Ground and Enabling Works for each Phase of the development hereby permitted, a scheme for temporary solid timber hoarded fencing (minimum height 2.5 m) around the perimeter of the site on all site boundaries, enclosing the relevant phase shall be submitted to and approved in writing by the Local Planning Authority. The temporary solid timber hoarded fencing and/or enclosure in accordance with BS 5975-2:2024 shall be installed prior to the start of any site clearance/demolition works and thereafter be retained for the duration of the building works in accordance with the approved details. No part of the temporary fencing and/or enclosure of the site shall be used for the display of commercial advertisement

hoardings unless the relevant advertisement consent is sought from the Local Planning Authority. Approved details shall be fully implemented and permanently retained and maintained during the demolition and construction phases of the development.

Reason: To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, in accordance with Policies D1 and D8 of the London Plan (2021), Policies DC1, DC2, DC8 and CC12 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

Piling Method Statement

- 14) No piling shall take place within a Phase until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out (where relevant) including measures to prevent and minimise the potential for damage to subsurface water or sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: To prevent any potential to impact on local underground water and sewerage utility infrastructure, in accordance with Policy SI 5 of the London Plan (2021) and Policies CC3 and CC5 of the Local Plan (2018). The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the details of the piling method statement.

Demolition Management Plan

- 15) Prior to the commencement of the Demolition, Ground and Enabling Works hereby permitted within a Phase, a Demolition Management Plan (DMP) shall be submitted to and approved in writing, by the Local Planning Authority. The DMP shall include:
- a. Details of location of site offices, ancillary buildings, plant, wheel-washing facilities, stacking bays and car parking.
 - b. Storage of any skips.
 - c. Oil and chemical storage.
 - d. Membership of the Considerate Contractors Scheme and FORS Silver accreditation.
 - e. Delivery locations and the proposed control measures and monitoring for noise, vibration, lighting, restriction of hours of work and all associated activities, audible beyond the site boundary to 0800-1800hrs Mondays to Fridays and 0800-1300 hrs on Saturdays and not on Sundays or Bank Holidays.
 - f. Community sustainability and liaison to be carried prior to submission of the DMP to inform development of the DMP approach. Details of engagement are to be submitted as an appendix to the DMP to identify concerns raised by residents and how these are addressed.

- g. Details of the named person and contact responsible for advance notification to neighbours and other interested parties of proposed works, and the public display of contact details including accessible phone contact to persons responsible for the site works for the duration of the works.
- h. Details shall also include the use of on road Ultra Low Emission Zone compliant Vehicles e.g. Euro 6 and Euro VI and Direct Vision vehicles to star rating 3
- i. Provisions within the site to ensure that all vehicles associated with the demolition works are properly washed and cleaned to prevent the passage of mud and dirt onto the highway.

The works shall be carried out in accordance with the approved DMP.

Reason: To ensure that occupiers of surrounding premises are not adversely affected by noise, vibration, dust, lighting, or other emissions from the building site in accordance with Policy D14 of the London Plan (2021), Policies DC1, DC12, CC6, CC7, CC10, CC11 and CC12 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

Demolition Logistics Plan

- 16) Prior to the commencement of the Demolition, Ground and Enabling Works within a Phase of the development hereby permitted, a Demolition Logistics Plan (DLP) shall be submitted, in accordance with TfL CLP Guidance, to and approved in writing by the Local Planning Authority. The works shall cover the following minimum requirements:

- a. Community engagement and liaison to be carried prior to submission of the CLP to inform development of the CLP approach. Details of engagement to be submitted as appendix to the CLP to identify concerns raised by residents and how these are addressed
- b. Regular community liaison meetings during the construction phase of the development.
- c. site logistics and operation
- d. construction vehicle routing to avoid local schools and no deliveries to occur during school arrival departure times.
- e. Details of the estimated number, size and routes of construction vehicles per day/week
- f. Details of the use of Ultra Low Emission vehicles
- g. Efficiency and sustainability measures to be undertaken for the works; and details on CLOCS compliant site operations.

The works shall be carried out in accordance with the approved DLP.

Reason: To ensure that occupiers of surrounding premises are not adversely affected by noise, vibration, dust, lighting, or other emissions from the building site in accordance with Policy T7 of the London Plan (2021) and T1, T6 and T7 of the Local Plan (2018).

Construction Management Plan

17) Prior to commencement of the of the construction phase within a Phase of the development hereby permitted, a Construction Management Plan (CMP) shall be submitted to and approved in writing by the Local Planning Authority. The CMP shall provide details of how construction works are to be undertaken and shall include:

- a. A detailed plan showing phasing of relevant foundations, basement, and ground floor structures and, for any other structures below ground level, including piling (temporary and permanent), contractors' method statements.
- b. Waste classification and disposal procedures and locations.
- c. Location of site offices, ancillary buildings, plant, wheel-washing facilities, tacking bays and car parking.
- d. Details of storage and any skips, oil and chemical storage.
- e. Membership of the Considerate Contractors Scheme and contractors accredited to FORS silver.
- f. Delivery locations and the proposed control measures and monitoring for noise, vibration, lighting, restriction of hours of work and all associated activities, audible beyond the site boundary to 0800-1800hrs Mondays to Fridays and 0800-1300hrs on Saturdays, and not on Sundays or Bank Holidays.
- g. Community engagement and liaison to be carried prior to submission of the CMP to inform development of the CMP approach. Details of engagement to be submitted as an appendix to the CMP to identify concerns raised by residents and how these are addressed.
- h. Details to include the named person and contact responsible for advance notification to neighbours and other interested parties of proposed works and public display of contact details including accessible phone contact to persons responsible for the site works for the duration of the works.
- i. Details of the use of on-road Ultra Low Emission Zone compliant Vehicles e.g. Euro 6 and Euro VI and Direct Vision vehicles to star rating 3.
- j. Provisions within the site to ensure that all vehicles associated with the construction works are properly washed and cleaned to prevent the passage of mud and dirt onto the highway.

The development shall be carried out in accordance with the approved CMP. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.

Reason: To ensure that occupiers of surrounding premises are not adversely affected by noise, vibration, dust, lighting or other emissions from the building site in accordance with Policies GG3, SI 1, SI 8, SI 10 and T7 of the London Plan (2021), and Policies DC1, DC2, CC6, CC7, CC10, CC11, CC12 and CC13 of the Local Plan (2018).

Construction Logistics Plan

- 18) Prior to commencement of the development hereby permitted within a Phase, a Construction Logistics Plan (CLP) shall be submitted, in accordance with TfL CLP Guidance, to and approved in writing by the Local Planning Authority. The CLP shall be in accordance with Transport for London Guidance. The CLP shall cover the following minimum requirements:
- a. Community engagement and liaison to be carried prior to submission of the CLP to inform development of the CLP approach. Details of engagement to be submitted as appendix to the CLP to identify concerns raised by residents and how these are addressed
 - b. site logistics and operations
 - c. construction vehicle routing
 - d. Details of the estimated number, size and routes of construction vehicles per day/week details of the use of Ultra Low Emission Zone (ULEZ) compliant Vehicles e.g. Euro 6 and Euro VI, including vehicles compliant with Direct Vision Standard star rating 3
 - e. details of the access and egress arrangements
 - f. delivery locations on the site
 - g. details of any vehicle holding areas; and other matters relating to traffic management to be agreed as required
 - h. Efficiency and sustainability measures to be undertaken for the works
 - i. membership of the and details on CLOCS compliant site operations
 - j. Details of any vehicle holding areas, and restriction of vehicle numbers to no more than 4 vehicles maximum in any one hour; and other matters relating to traffic management to be agreed as required.

The works shall be carried out in accordance with the approved CLP. Approved details shall be fully implemented and retained and maintained throughout the construction phase of the development.

Reason: To minimise the impacts of construction-related vehicle movements and facilitate sustainable construction travel to the site in accordance with Policy T7 of the London Plan (2021) and Policies T1 and T6 of the Local Plan (2018).

Air Quality Dust Management Plan (Demolition)

- 19) Prior to the commencement of the demolition phase (excluding installation of hoarding and MCERTS compliant Particulate (PM10, PM2.5) monitors around the perimeter of the site) within each phase of the development hereby permitted, details of an Air Quality Dust Management Plan (AQDMP) in accordance with the Council's AQDMP Template 'E' shall be submitted to and approved in writing by the Local Planning Authority. The demolition works shall be carried out in accordance with the approved AQDMP during the demolition phases of the development.

Reason: To comply with the requirements of the NPPF, Policy SI 1 of the London Plan (2021), Policy CC10 of the Local Plan (2018) and the council's Air Quality Action Plan.

Air Quality Dust Management Plan (Construction)

- 20) Prior to the commencement of the construction phase (excluding installation of hoarding and MCERTS compliant Particulate (PM10, PM2.5) monitors around the perimeter of the site) within each phase of the development hereby permitted, details of an Air Quality Dust Management Plan (AQDMP) in accordance with the Council's AQDMP Template 'F' shall be submitted to and approved in writing by the Local Planning Authority.

The construction works shall be carried out in accordance with the approved AQDMP during the demolition phases of the development.

Reason: To comply with the requirements of the NPPF, Policy SI 1 of the London Plan (2021), Policy CC10 of the Local Plan (2018) and the council's Air Quality Action Plan.

Non-Road Mobile Machinery (NRMM)

- 21) Within a minimum of seven days prior to commencement of the enabling works, site clearance or demolition works of the first phase of the development hereby permitted, details of the Non-Road Mobile Machinery (NRMM) to be used shall be submitted to and approved in writing by the Local Planning Authority. The NRMM shall have CESAR Emissions Compliance Verification (ECV) identification and 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 shall be registered on the London GLA NRMM register [GLA-NRMM-Register](#). Approved details shall be fully implemented and thereafter permanently retained and maintained until occupation of the complete development.

Reason: To comply with the requirements of the NPPF, Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018) and the council's Air Quality Action Plan.

DRAINAGE

Updated Sustainable Drainage Strategy (SuDS)

- 22) Prior to commencement of the development hereby permitted (excluding Demolition, Ground and Enabling Works) within a Phase, an updated Sustainable Drainage Strategy (SuDS), which details how surface water will be managed on-site in-line with the London Plan Drainage Hierarchy's preferred SuDS measures, shall be submitted to and approved in writing by the Local Planning Authority. Information shall include details on the design, location and attenuation capabilities of the proposed sustainable drainage measures such as rainwater harvesting, green/blue roofs, permeable hard surfacing and landscape-based SuDS features such as raingardens and swales. Details of the proposed flow controls and flow rates for any discharge of surface water to individual connections to the combined sewer system must also be provided, with the aim of achieving greenfield run-off rates for final discharges. Details/results of further infiltration tests should be included in the updated SuDS Strategy and integration of infiltration measures implemented where feasible on the site. Where feasible, rainwater harvesting should also be integrated to collect rainwater for re-use in the site.

The Strategy shall be implemented in accordance with the approved details, and thereafter all SuDS measures shall be retained and maintained in accordance with the approved details and shall thereafter be permanently retained in this form.

Reason: To prevent any increased risk of flooding and to ensure the satisfactory storage of/disposal of surface water from the site in accordance with Policy SI 13 of The London Plan (2021) and Policy CC1, CC2, CC3, CC4, CC5, OS1, OS4 and OS5 of the Local Plan (2018).

Water Network

- 23) Prior to first occupation within a Phase of the development hereby permitted, a housing and Infrastructure Phasing Plan (HIPP) shall be submitted to and approved in writing by the Local Planning Authority.

The HIPP must either:

- a. Confirm that all water network upgrades required to accommodate the additional flows from the development have been completed or, if not:
- b. Set out how the water network is to be upgraded to accommodate the additional flows, and include the following information:

The number of dwellings in the Development which are permitted to be occupied; the timings for when dwellings in the Development may be occupied; and whether such occupation is contingent on delivery of infrastructure for the water network and if so what the terms of the conditions for such occupation are. No occupation shall take place other than in accordance with the approved HIPP.

Reason: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Condition required by Thames Water, to ensure that sufficient water capacity is made available to cope with the new development; and to avoid adverse environmental impact upon the community in accordance with Policy SI 5 of the London Plan (2021).

Foul Water

- 24) Prior to first occupation within a Phase of the development hereby permitted, a report ("the Foul Water Report") shall be submitted to and approved in writing by the Local Planning Authority. The report must either:
- a. demonstrate that (i) foul water capacity exists off site to serve the development, or (ii) that any foul water network upgrades required to accommodate the additional flows from the development have been completed: or
 - b. contain a development and infrastructure plan which shows that foul water will be dealt with in some other way.

Where a development and infrastructure phasing plan are agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason: Network reinforcement works may be required to accommodate the Proposed Development. Any reinforcement works identified will be necessary to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at www.thameswater.co.uk/preplanning

Living Roof

- 25) Prior to commencement of above ground works within a Phase of the development hereby permitted, details of all living roofs, including a planting maintenance plan shall be submitted to and approved in writing by the Local Planning Authority. The development shall not be occupied until the scheme has been carried out in accordance with the approved details and shall thereafter be permanently retained in this form.

Reason: To ensure the provision of green roofs in the interests of sustainable urban drainage and habitat provision, in accordance with Policies G5, G6 and SI 13 of the London Plan (2021) and Policy OS5 and CC4 of the Local Plan (2018).

ENVIRONMENT

Sustainability Statement

- 26) Prior to commencement of each phase of the development hereby permitted, an updated Sustainability Statement shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: In the interests of energy conservation and wider sustainability, in accordance with Policies SI 2, SI 3 and SI 4 of the London Plan (2021) and Policies CC1, CC2 and CC7 of the Local Plan (2018).

Energy Strategy

- 27) Prior to commencement of the development hereby permitted, an Update Energy Strategy shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: In the interests of energy conservation, reduction of CO2 emissions and wider sustainability, in accordance with Policies SI 2, SI 3 and SI 4 of the London Plan (2021) and Policies CC1, CC2 and CC7 of the Local Plan (2018).

BREEAM Report

- 28) Prior to commencement of each phase of the development hereby permitted, an updated BREEAM Report confirming that any non-residential uses within that phase achieve a minimum 'Excellent' BREEAM rating shall be submitted to and approved in writing by the Local Planning Authority.

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

BREEAM Excellent rating

- 29) Within 6 months of the occupation of any of the non-residential buildings hereby permitted, a BREEAM post-completion assessment and certification, confirming that those buildings achieve a minimum 'Excellent' BREEAM rating, shall be submitted to and approved in writing by the Local Planning Authority.

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

Whole Lifecycle Carbon Assessment

- 30) Prior to commencement of each phase of the development hereby permitted, an updated Whole Life-Cycle Carbon Assessment shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of energy conservation and reduction in carbon emissions, in accordance with London Plan Policy SI 2 (2021).

Whole Lifecycle Carbon Assessment Post-Construction

- 31) Prior to first occupation of the buildings hereby permitted, a post-construction monitoring report setting out how the development has met the requirements of the Whole Life-Cycle Carbon Assessment approved under Condition 31 or, if not, provision for action to be taken to ensure that the development will meet those requirements, shall be submitted to and approved in writing by the Local Planning Authority. The applicant should complete the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance.

Reason: In the interests of energy conservation and reduction in carbon emissions, in accordance with London Plan Policy SI 2 (2021).

Circular Economy Assessment

- 32) Prior to commencement of each phase of the development hereby permitted, an updated Circular Economy Statement together with details of any measures necessary to ensure that the Statement's requirements are met shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of maximising the re-use of materials and reducing waste and supporting the Circular Economy, in accordance with London Plan Policy SI 7 (2021).

Circular Economy Assessment Post-Construction Report

- 33) Prior to first occupation of the buildings hereby permitted, a post-construction monitoring report setting out how the construction process has met the requirements of the Circular Economy Statement approved under Condition 33, or, if not, action to be taken to ensure that the development will meet those requirements, shall be submitted to and approved in writing by the Local Planning Authority. The post-construction monitoring report should be completed in line with the GLA's Circular Economy Statement Guidance, and the applicant submit it to the GLA.

Reason: In the interests of maximising the re-use of materials and reducing waste and supporting the Circular Economy, in accordance with London Plan Policy SI 7 (2021).

Housing Quality Mark (HQM) Report

- 34) Prior to commencement of each phase of the development hereby permitted, an updated HQM Report confirming that the residential units achieve a minimum '4 star' HQM rating shall be submitted to and approved in writing by the Local Planning Authority.

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

Housing Quality Mark (HQM) 4-star rating

- 35) Within 6 months of the occupation of any part of the residential buildings hereby permitted, a HQM post-construction assessment and certification, confirming the residential units achieve a minimum '4 star' HQM rating, or, if not, action to be taken to ensure that the units will achieve that rating, shall be submitted to and approved in writing by the Local Planning Authority, in order to verify that the measures contained within the HQM Report approved under Condition 35 have been implemented in full.

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

AIR QUALITY

Ventilation Strategy

- 36) Prior to commencement of above ground works within each phase of the development hereby permitted, a Ventilation Strategy Report to mitigate the impact of existing poor air quality for the two hundred and fifty-three self-contained dwellinghouses (Use Class C3) and children's day nursery (Use Class E) shall be submitted to and approved in writing by the Local Planning Authority. This is applicable to all receptor locations where Council 2030 WHO aligned Annual Mean Air Quality Targets for Nitrogen Dioxide (NO₂) – 10ug/m⁻³, Particulate (PM₁₀) - 15 ug/m⁻³ and Particulate (PM_{2.5}) - 5 ug/m⁻³ 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 elevations of all residential and nursery use 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 and nursery use 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 (NO₂) and Particulate Matter (PM_{2.5}, PM₁₀) filtration with air intakes on the rear elevation to remove airborne pollutants. The filtration system shall have a minimum efficiency of 90% in the removal of Nitrogen Oxides/Dioxides, Particulate Matter (PM_{2.5}, PM₁₀) in accordance with BS EN ISO 10121-1:2014 and BS EN ISO 16890:2016.
 - 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 use floors and classrooms on the nursery use 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

Reason: To comply with the requirements of the NPPF, Policy SI 1 of the London Plan (2021), and Policy CC10 of the Local Plan (2018) and the council's Air Quality Action Plan

Ventilation Strategy (Compliance)

- 37) Prior to first occupation within each Phase of the development hereby permitted, details of a post installation compliance report including photographic confirmation of the mitigation measures as detailed in the approved ventilation strategy as required by Condition 37 to mitigate the impact of existing poor air quality shall be submitted to and approved in writing by the Local Planning Authority. The report shall be produced by an accredited Chartered Building Surveyor (MRICS). Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

Reason: To comply with the requirements of the NPPF, Policy SI 1 of the London Plan (2021), and Policy CC10 of the Local Plan (2018) and the council's Air Quality Action Plan.

Indoor Air Quality

- 38) Prior to occupation of the development within a phase hereby permitted, details (including manufacturer specification, installation/commissioning certificates and photographic confirmation) of the installed electric induction stoves in the kitchens of the two hundred and fifty-three self-contained dwellinghouses (Use Class C3), children's day nursery (Use Class E[f]) and new community centre (Use Class F) 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.

Reason: To comply with the requirements of the NPPF, Policy SI 1 of the London Plan (2021), and Policy CC10 of the Local Plan (2018) and the council's Air Quality Action Plan.

Green Vegetation Barriers (Air Quality)

- 39) Prior to the occupation of the development within a Phase 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:
- a. planting schedules, details of species, height plus 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; and
 - b. photographic confirmation of installed green vegetation barriers (minimum height of 1.5 metre) on the site boundaries with Commonwealth Road, India Way, and Canada Way.

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.

Reason: To comply with the requirements of the NPPF, Policy SI 1 of the London Plan (2021), and Policy CC10 of the Local Plan (2018) and the council's Air Quality Action Plan.

Zero Emission Heating (compliance)

- 40) Prior to the occupation of each phase of the development hereby permitted, details (including manufacturer specification, installation/commissioning certificates and photographic confirmation) of the installed Zero Emission MCS certified Air/Water Source Heat Pumps and back up Heat Battery electric boilers to be provided for space heating and hot water for the two hundred and fifty-three self-contained dwellinghouses (Class C3 use) and the non-residential uses (Classes E (f) and F1 uses) shall be submitted to and approved in writing by the Local Planning Authority. Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

Reason: To comply with the requirements of the NPPF, Policy SI 1 of the London Plan (2021), Policy CC10 of the Local Plan (2018) and the council's Air Quality Action Plan.

Ultra-Low Emission Strategy

- 41) Prior to the occupation of the development within a Phase hereby permitted, an Ultra Low Emission Strategy (ULES) shall be submitted to and approved in writing by the Local Planning Authority. Details shall include:
- a. Facilities and measures that will minimise the impact of vehicle emissions from increasing personal deliveries for the residential use (Class C3) e.g., carrier agnostic parcel locker, concierge, Cargo bike bays etc.
 - b. Procurement policy and processes for contractors and suppliers for the community use (Use Class F1), and nursery (Use Class E[f]) that will incentivise and prioritise the use of Zero Exhaust Emission Vehicles in accordance with the emission hierarchy of 1) Walking Freight Trolley 2) Cargo bike (3) Electric Vehicle.
 - c. Use of Zero Exhaust Emission Vehicles for the community use (Use Class F1), and nursery (Use Class E[f]) in accordance with the emissions hierarchy (1) Walking Freight Trolleys (2) Cargo bike (3) Electric Vehicle.
 - d. Reduction and consolidation of deliveries and collections for nursery (Use Class E) and community centre (Use Class F) e.g., Waste.
 - e. Re-timing of deliveries and collections for nursery (Use Class E) and community centre (Use Class F) outside of peak traffic time periods of 07:00-10:00 and 15:00-19:00 hrs.

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

Reason: To comply with the requirements of the NPPF, Policy SI 1 of the London Plan (2021), Policy CC10 of the Local Plan (2018) and the council's Air Quality Action Plan.

Secondary Mains Electricity Power/Uninterruptable Power Supply (UPS) compliance

- 42) Prior to occupation of each phase of the development hereby permitted, details (including manufacturer specification, installation/commissioning certificates and photographic confirmation) of Zero Emissions secondary mains electricity power supply or Uninterruptable Power Supply (UPS) in accordance with BS9999, BS 9991, and BS 7671 for fire and life safety equipment 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.

Reason: To comply with the requirements of the NPPF, Policy SI 1 of the London Plan (2021), Policy CC10 of the Local Plan (2018) and the council's Air Quality Action Plan.

Waste Water Heat Recovery System (WWHRS)

- 43) Prior to occupation of each phase of the residential development hereby permitted, details (including manufacturer specification, installation / commissioning certificates and photographic confirmation) of the installed Wastewater Heat Recovery System (WWHRS) for the dwellinghouses (Use Class C3) in that phase 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.

Reason: To comply with the requirements of the NPPF, Policy SI 1 of the London Plan (2021), Policy CC10 of the Local Plan (2018) and the council's Air Quality Action Plan.

Battery Solar Energy Storage Systems (BSESS)

- 44) Prior to occupation of each phase of the development hereby permitted, details (including manufacturer specification, installation/commissioning certificates and photographic confirmation) of the installed Battery Solar Energy Storage Systems (BSESS) for the residential use (Class C3) and the non-residential uses (Classes E (f) and F1 uses) shall be submitted to and approved in writing by the Local Planning Authority. Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

Reason: In the interests of energy conservation, reduction of CO2 emissions and wider sustainability, in accordance with NPPF, Policies SI2, SI3 and SI4 of the London Plan (2021) and Policies CC1, CC2, CC7, CC10 of the Local Plan (2018) and the councils Air Quality Action Plan.

NOISE

Background Noise Levels (plant, machinery/ equipment)

- 45) Prior to occupation of each phase of the development hereby permitted, details of the external noise level emitted from plant/ machinery/ equipment and mitigation measures as appropriate for the relevant building or buildings shall be submitted to and approved in writing by the Local Planning Authority.

The measures shall ensure that the external sound level emitted from plant, machinery/ equipment will be lower than the lowest existing background sound level by at least 10dBA, to prevent any adverse impact. The assessment shall be made in accordance with BS4142:2014+A1:2019 at noise sensitive premises, which have the potential to be affected by the development, 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 relevant Building and thereafter be permanently retained in this form.

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).

Anti- vibration mounts and silencing of machinery etc.

- 46) Prior to occupation of each phase of the development hereby permitted, details of anti-vibration measures for the relevant building or buildings shall be submitted to and approved in writing by the Local Planning Authority. The measures shall ensure that machinery, plant/ equipment, extract/ ventilation system and ducting are mounted with proprietary antivibration isolators and fan motors are vibration isolated from the casing and adequately silenced. Approved details shall be implemented prior to occupation of the relevant Building and thereafter be permanently retained in this form.

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).

Internal/External Room Noise Criteria

- 47) The noise level in rooms of the proposed residential units and the nursery/community centre uses hereby approved shall meet the noise standard specified in BS8233:2014 for internal rooms and external amenity areas.

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

Residential Sound Insulation

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

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

Extraction and Odour Control system for non-domestic kitchens

- 49) Prior to the installation of extract and odour systems to the nursery and community centre buildings, details shall be submitted to and approved in writing by the Local Planning Authority, of the installation, operation, and maintenance of the odour abatement equipment and extract system with ePM1 90% (F9) particulate filtration, including the height of the extract duct and vertical discharge outlet, in accordance with Appendix 4G of the LBHF Planning Guidance Supplementary Planning Document - February 2018. Approved details shall be implemented prior to the commencement of the use and thereafter be permanently retained.

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

External doors

- 50) Prior to occupation/use of the Nursery and Community Centre hereby permitted, all external doors to the school premises shall be fitted with self-closing devices, which shall be maintained in an operational condition and at no time shall any external door be fixed in an open position.

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

Tannoy or Address Systems

- 51) No tannoy or public address systems shall be used in relation to the development hereby permitted.

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

Music/ Loud/ Amplified Voices

- 52) Neither music nor amplified voices emitted from the Nursery and Community Centre hereby permitted shall be audible at any residential/ noise sensitive premises.

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

Floodlights, Security lights and Decorative External Lighting

- 53) Prior to occupation of each phase of the development hereby permitted, details of any proposed external artificial lighting, including security lights of the relevant building or buildings, shall be submitted to and approved in writing by the Local Planning Authority and no occupation shall take place until the lighting has been installed in full accordance with the approved details.

Such details shall include the number, exact location, height, design, and appearance of the lights, together with data concerning the levels of illumination and light spillage and the specific measures, having regard to the recommendations of the Institution of Lighting Professionals in the 'Guidance Note 01/21: Guidance Notes for the Reduction of Obtrusive Light'. to ensure that any lighting proposed does not harm the existing amenities of the occupiers of neighbouring properties. The relevant building or buildings shall not be used or occupied until any external lighting provided has been installed in accordance with the approved details and shall thereafter be permanently retained in this form.

Reason: To ensure that the amenity of occupiers of the development site / surrounding premises and natural habitat is not adversely affected by lighting, in accordance with Policies GG1, D3 and D11 of the London Plan (2021), Policies CC12, CC13, DC1, DC2 and DC8 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

Lights off (Nursery & Community Centre Buildings)

- 54) Prior to first occupation/use of the Nursery and Community Centre hereby permitted, a scheme for the control and operation of the proposed lighting within the building, during periods of limited or non-occupation, shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented prior to the occupation and be operated only in accordance with the approved details.

Reason: To ensure that the buildings do not cause excessive light pollution and to conserve energy when they are not occupied, in accordance with Policies D9 of the London Plan (2021) and Policy CC12 of the Local Plan (2018).

Hours of Use (Roof Terraces and All-Weather Pitch)

- 55) The outdoor space / all-weather pitch / terrace areas serving the Community Centre Building hereby approved shall only be used between 07.00 hours and 19:00 hours daily.

Reason: To ensure that control is exercised over the use of the outdoor space / terrace areas so that undue harm is not caused to the amenities of the occupiers of the development and neighbouring residential properties because of noise and disturbance, particularly in the quieter night-time hours, in accordance with policy CC11 and CC13 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

Hours of Use of Nursery External Areas

- 56) The external areas serving the Nursery hereby approved shall only be used between 08.00 hours and 18:00 hours daily.

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

HIGHWAYS

Highways Works

- 57) Prior to commencement of each phase of the development hereby permitted, (excluding Demolition and Ground Enabling Works), details of the highway work identified in the Active Travel Zone route assessment (Transport Assessment Rev 05, dated June 2024) shall be submitted to and approved by the Local Planning Authority. The works include:
- a. Any improvements to the pedestrian routes between the application site and Wormholt Park, White City Underground Station, Wood Lane Underground Station, White City Bus Station, Shepherds Bush Market Underground Station and the White City Estate Roads; measures to include surface treatment/repairs, lighting and wayfinding; footway widening works; tree planting within the surrounding area; provision of tactile paving where necessary; and reinstatement /improvement works to the footways on the site frontages.
 - b. Highways improvement works at the Australia Road junction with India Way and the Australia Road junction with Canada Way at the locations where the new public realm interfaces with the public highways.
 - c. The provision of green features such as rain gardens and tree planting along the Australia Road corridor extending from Bridget Joyce Square westwards to Bloemfontein Road and Bridget Joyce Square eastwards to South Africa Road creating a green east / west corridor through the estate that links to and through the new public realm space.
 - d. Improvements to the lighting and signage on pedestrian link that connects South Africa Road to Australia Road, which will improve pedestrian connectivity and wayfinding between the application site and the bus stops on South Africa Road.
 - e. Install tactile paving to the crossing point of the entry to Wood Lane Estate (Route 3: Site to White City Underground Station) to make this route accessible to all.
 - f. Provide measures to make Route 7: Site to India Way accessible and safer for cyclists.
 - g. The rearrangement / reprovion of parking required to be removed to the east of the site along Canada Way should be reaccommodated further south so there is no loss of on street parking

The development shall not be occupied until these works have been implemented in accordance with the approved details.

Reason: In the interests of highway safety, in accordance with Policies T1, T2, T3 and T4 of the London Plan (2021) and Policy T1 of the Local Plan (2018).

S278 Agreement (Highway Works)

- 58) Prior to 6 months of first occupation of each phase of the development hereby permitted, an agreement under Section 278 of the Highways Act 1980 for that phase shall be entered into with the Local Planning Authority for the Highway Works approved under Condition 57 in line with the Council's Streetsmart standards.

Reason: To ensure safe and accessible pedestrian access and a satisfactory standard of appearance and to maintain pedestrian and highway safety, in accordance with Policy T1 of the Local Plan (2018).

Wayfinding Signage Strategy

- 59) Prior to commencement of each phase of the development hereby permitted, a Wayfinding Signage Strategy shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall set out measures to improve cycling and walking wayfinding in the vicinity of the site; improved connectivity to Wormholt Park, White City Underground Station, Wood Lane Underground Station, White City Bus Station and Shepherds Bush Market Underground Station; and clarify how the wayfinding signage will be delivered. The development shall not be occupied until these works have been implemented in accordance with the approved details.

Reason: To ensure that the proposal provides an inclusive and accessible environment and provided cycle infrastructure within and around the development in accordance with the Policy D5, D8 and T5 of the London Plan (2021) and Policies E3 and T3 of the Local Plan (2018).

Existing Car Parking

- 60) Prior to commencement of each phase of the development hereby permitted, details of the re-provision of any existing parking spaces affected/relocated by that Phase (if any) shall be submitted to and approved in writing by the Local Planning Authority.

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

Proposed Car Parking

- 61) Prior to first occupation of each phase of the development hereby permitted, the parking spaces (including the required accessible parking) shall be provided in accordance with the approved drawings. The accessible parking spaces shall be permanently retained for the life of the development for use by holders of a valid blue badge.

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

Electric Vehicle Charging Points

- 62) Prior to first occupation of each phase of the development hereby permitted, details of the installation including location and type of active electric vehicle charging points (minimum 7kW) for a minimum of twelve on-site car parking spaces must be submitted to and approved in writing by the Local Planning Authority. The remaining 14 parking spaces provided on site shall have passive Electric vehicle charging provision. The approved electric vehicle charging points shall be installed and retained in working order for the lifetime of the development.

Reason: To encourage sustainable travel in accordance with Policies GG3, D5, SI 1, T6 and T7 of the London Plan (2021), and Policies CC1 and T4 of the Local Plan (2018).

Car Parking Management Plan

- 63) Prior to first occupation of each phase of the development hereby permitted, a Car Parking Management Plan for the relevant phase shall be submitted to and approved in writing by the Local Planning Authority. The Car Parking Management Plan shall include the following details:
- a. Details of Car Club Membership and the car park layout including the car club spaces.
 - b. Monitoring of future demand for the blue badge parking spaces at the site
 - c. Monitoring the future demand for electric charging facilities.
 - d. Details of measures to manage parking in the proposed turning head.
 - e. The proposed allocation of and arrangements for the management of parking spaces including disabled parking bays serving the residential development.
 - f. Details of how the Nursery use (Class E[f]) and Community Centre use (Class F) parking spaces would be monitored.
 - g. Details of the controls of means of entry to the central access road; and
 - h. The safety and security measures to be incorporated within the development to ensure the safety of car/cycle parking areas.

The car parking shall be provided and managed in accordance with the approved Car Parking Management Plan for the lifetime of the development.

Reason: To ensure that the development does not lead to the obstruction of adjacent streets and in the interests of highway safety, in accordance with Policies T1, T2, T3 and T4 of the London Plan (2021) and Policy T1 of the Local Plan (2018).

Road Safety Audit(s)

- 64) Prior to commencement within each phase of the development hereby permitted of works to any operational vehicular access to the site, detailed design post construction stage 2 & 3 Road Safety Audit(s) for that phase shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the accesses and proposed roads do not compromise highway safety or the safety of pedestrians on the footway, in accordance with policy 7.2 of the London Plan, Policies T4 and T5 of the Local Plan 2018.

Cycle Parking

- 65) Prior to first occupation of each phase of the development hereby permitted, details of secure, accessible, level and covered cycle storage, including 5% accessible / larger storage provision, for the relevant building or buildings, shall be submitted to and approved in writing by the Local Planning Authority. Details shall include type of cycle spaces (Sheffield or two-tier stands) to be provided and access/security arrangements to the cycle parking facilities. No building shall be occupied until the relevant approved facilities have been provided for that building. The cycle parking facilities shall thereafter be retained for the development hereby permitted and not used for any other purpose.

Reason: To ensure the suitable provision of cycle parking within the development to meet the needs of future site occupiers, in accordance with Policy T5 of The London Plan (2021) and Policy T3 of the Local Plan (2018).

Cargo bicycle parking

- 66) Prior to occupation within each phase of the development hereby permitted, details (including manufacturer specification, location and type, installation/commissioning certificates and photographic confirmation) of the installed minimum of two ground level cargo bicycle parking spaces 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.

Reason: To encourage sustainable travel in accordance with Policies GG3, D5, SI 1, T6 and T7 of the London Plan (2021), and Policies CC1 and T4 of the Local Plan (2018) and the council's Air Quality Action Plan.

Delivery & Servicing Management Plan

- 67) Prior to first occupation of each phase of the development hereby permitted, of the development hereby permitted, a Delivery and Servicing Plan (DSP) shall be submitted to and approved in writing by the Local Planning Authority. Details shall include the management and times of deliveries to avoid peak times, emergency access, collection of waste and recyclables, times and frequencies of deliveries and collections, quiet loading/unloading measures, and vehicle movements.

The development shall take place, and after completion the site shall be managed, in accordance with the approved details for the lifetime of the development.

Reason: To ensure that satisfactory provision is made for delivery, servicing and refuse storage and collection and to ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by noise, in accordance with Policies T2 and T7 of the London Plan (2021) and Policies T2, CC11 and CC13 of the Local Plan (2018) and SPD Key Principle TR28 2018.

Deliveries and Collections

- 68) For the Nursery use (Class E[f]) and Community Centre use (Class F) hereby permitted no deliveries nor collections/ loading nor unloading shall occur other than between the hours of 10:00 to 16:00 and 19:00 to 21:00 Monday to Friday, 10:00 to 18:00 on Saturdays and at no time on Sundays and Public/Bank Holidays.

Reason: To ensure that deliveries and collections occurs without compromising highway safety, in accordance with Policy D5 of the London Plan (2021), Policies HO6, T1 and T5 of the Local Plan (2018) and SPD Key Principle TR6 (2018).

Demolition and Construction Workers Travel Plan

- 69) Prior to commencement of the development hereby permitted, a Demolition and Construction Workers Travel Plan ("the Plan"), which shall include provision for monitoring and action to be taken if targets set out in the Plan are not being met, shall be submitted to, and approved in writing by, the Local Planning Authority. The Plan shall be implemented in full compliance with the approved details.

Reason: To ensure that the existing amenities of residents are safeguarded and to ensure that the operation of the use does not add unduly to existing levels of traffic generation, in accordance with Policies T2, CC11 and CC13 of the Local Plan (2018).

Residential Travel Plan

- 70) Prior to the first occupation of the development hereby permitted, a BREEAM compliant Residential Travel Plan which shall include provision for monitoring and action to be taken if targets set out the Residential Travel Plan are not being met, shall be submitted to and approved in writing by the Local Planning Authority. The Residential Travel Plan shall include information on how alternative methods of transport to and from the development, (other than by car) will be encouraged and details of how this will be reviewed and monitored. The Residential Travel Plan shall be implemented in full compliance with the approved details and shall thereafter be retained whilst the residential use remains in operation.

Reason: To ensure that the existing amenities of residents are safeguarded and to ensure that the operation of the use does not add unduly to existing levels of traffic generation, in accordance with Policy T3 of the Local Plan (2018).

Nursery and Community Centre Travel Plans

- 71) Prior to first occupation or operational use of the Nursery (Class E[f]) and Community Centre (Class F) hereby permitted, updated Travel Plans in line with TfL's guidance, which shall include provision for monitoring and action to be taken if targets set out the Travel Plans are not being met, shall be submitted to and approved in writing by the Local Planning Authority. Upon the occupation of the building, the Travel Plans shall be implemented in full compliance with the approved details and shall thereafter continue to be fully implemented whilst the use remains in operation. Such details shall include information on how alternative methods of transport to and from the nursery and community centre other than by car will be encouraged.

Reason: To ensure that the development does not generate an excessive number of car trips which would be contrary to the Council's policies of car restraint set down in Policies T2 and T4 of the Local Plan (2018).

REFUSE / WASTE

Refuse

- 72) Prior to first occupation of each phase of the development hereby permitted, the refuse storage enclosures indicated on the approved drawings for the relevant building or buildings shall be provided for the storage of refuse and recyclable materials. Provision shall be made for bulky waste storage area(s) with capacity of a minimum 10m² for every 50 housing units and be accessible to refuse collectors. All the refuse/recycling/bulky waste storage facilities shall be retained thereafter in accordance with the approved details.

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

Waste Management Strategy

- 73) The development hereby permitted shall be undertaken in full accordance with the Operational Waste Strategy by SLR dated 21 June 2024 and the site shall be operated thereafter in accordance with the approved details.

Reason: To protect the environment and to ensure that satisfactory provision is made for refuse/recycling storage and collection, in accordance with Policy T7 of the London Plan (2021) and Policies CC6 and CC7 of the Local Plan (2018) and SPD Key Principle WM1 (2018).

DESIGN

Details and Materials

- 74) Prior to commencement of each phase of the development hereby permitted, (excluding Demolition and Ground Enabling Works), particulars and samples (where appropriate) of all the materials to be used in all external faces of the building or buildings; including details of the colour, composition and texture of the brickwork, details of bond, colour, mortar mix and mortar colour to be used, any stonework and metal; details of all external windows; including window opening and glazing styles; balustrades to balconies and roof terraces; roof top plant and general plant screening; and all external hard surfaces including paving, boundary walls, railings, gates, fences, and other means of enclosure shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, in accordance with Policies D3, D4, D8, D9 and HC1 of the London Plan (2021), Policies DC1 and DC8 of the Local Plan (2018) and guidance contained within the Planning Guidance Supplementary Planning Document (2018).

1:20 Details

- 75) Prior to commencement of each phase of the development hereby permitted (excluding Demolition and Ground Enabling Works), detailed drawings at a scale not less than 1:20 (in plan, section, and elevation) of typical sections/bays of each of the approved Buildings shall be submitted and approved in writing by the Local Planning Authority. These shall include details of the proposed cladding, fenestration (including framing and glazing details), balustrades (including roof terraces), entrances, roof top plant and plant screening, handrails, canopies and junctions between Building elements. The development shall be carried out in accordance with the details as approved and thereafter permanently retained in this form.

Reason: To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, and to preserve the character and appearance of the surrounding conservation areas and other heritage assets; in accordance with Policies D3, D4, D8, D9 and HC1 of the London Plan (2021), Policies DC1, DC2 and DC8 of the Local Plan (2018) and

guidance contained within the Planning Guidance Supplementary Planning Document (2018).

1:20 Roof Top Plant Details

- 76) Prior to commencement of each phase of the development hereby permitted (excluding Demolition and Ground Enabling Works), details of any enclosure(s) to be fitted to roof mounted equipment at a scale of 1:20 (in plan, section, and elevation) of the rooftop plant enclosures for each building shall be submitted to and approved in writing by the Local Planning Authority. No relevant part of the development shall be used or occupied until any enclosure(s) have been constructed in accordance with the approved details, and the enclosure(s) shall thereafter be permanently retained in this form.

Reason: To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm and ensure that the amenity of occupiers of surrounding premises is not adversely affected by noise, in accordance with Policies D3, D4, D8, D9 and HC1 of the London Plan (2021) and Policies DC1, DC8, CC11 and CC13 of the Local Plan (2018).

1:20 Details – Boundaries

- 77) Prior to the commencement of each phase of the development hereby permitted (excluding Demolition and Ground and Enabling Works), detailed drawings at a scale not less than 1:20 (in plan, section, and elevation) of boundary walls, fences, railings, gates, and measures to mitigate privacy of principal ground floor windows, shall be submitted and approved in writing by the Local Planning Authority and no part of the development shall be used or occupied prior to the completion of the relevant works in accordance with the approved details.

Reason: To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, in accordance with Policies D3, D4, D8, D9 and HC1 of the London Plan (2021) and Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018).

No Roller Shutters

- 78) No roller shutters shall be installed on any part of the nursery or community centre building hereby approved.

Reason: To ensure a satisfactory external appearance and to prevent harm to the street scene, in accordance with policies DC1, DC2 and DC5 of the LBHF Local Plan (2018).

Roofs

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

Reason: The use of the roofs as a terrace (other than as identified on the approved drawings) would increase the likelihood of harm to the residential amenities of the occupiers of neighbouring properties, as a result of noise and disturbance and loss of privacy contrary to Policies HO11 and CC11 of the Local Plan (2018).

External alterations

- 80) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking or re-enacting that principal Order with or without modification), no alterations shall be carried out to the external appearance of the buildings hereby permitted, including the installation of air-conditioning units, ventilation fans, extraction equipment, balustrades, fencing, canopies or roof structures not shown on the approved drawings. No plumbing, extract flues or pipes, plant, water tanks, water tank enclosures or other structures that are not shown on the approved plans, shall be erected upon the roofs of the buildings hereby permitted.

Reason: To ensure a satisfactory external appearance and to prevent harm to the amenities of the occupiers of neighbouring residential properties, in accordance with Policies DC1 and DC8 of the Local Plan (2018).

Aerials and Satellite Dishes

- 81) Prior to first occupation of each phase of the development hereby permitted, details of any aerials and satellite dishes for the relevant building or buildings shall be submitted and approved in writing by the Local Planning Authority. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking or re-enacting that principal Order with or without modification), no additional aerials, antennae, satellite dishes or related telecommunications equipment shall be erected on any part of the relevant part of the development hereby permitted.

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

Photovoltaic Panels

- 82) Prior to first occupation of each phase of the development hereby permitted, full details of the proposed photovoltaic (PV's) system on the roofs of the building or buildings shall be submitted to and approved in writing by the Local Planning Authority at a scale no less than 1:20 in plan, section and elevation. Such details shall be implemented prior to occupation or use of the building and shall be retained thereafter.

Reason: To ensure that the development is consistent with the Mayor's sustainable design objectives, to ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, in accordance with Policies SI 2, SI 3, D1, D4 of the London Plan (2021), Policies DC1, DC2,

DC3 and DC8 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

Window Cleaning Equipment

- 83) Prior to first occupation of each phase of the development hereby permitted, details of the proposed window cleaning equipment for the relevant building or buildings shall be submitted and approved in writing by the Local Planning Authority. The details shall include the appearance, means of operation and storage of the cleaning equipment. No relevant building within the development shall be used or occupied until the equipment has been installed for that building in accordance with the approved details and the approved equipment shall thereafter be permanently retained in this form.

Reason: To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, in accordance with Policies D3, D4, D8, D9 and HC1 of the London Plan (2021) and Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018).

Obscured Glass

- 84) The window glass of any ground floor non-residential use hereby approved shall be clear and shall not be mirrored, or otherwise fully obscured.

Reason: To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, in accordance with Policy D8 of The London Plan (2021) and Policies DC1 and DC8 of the Local Plan (2018).

Secure by Design

- 85) Prior to commencement of each phase of the development above ground level hereby permitted, a statement of how 'Secured by Design' requirements in relation to the new building or buildings are to be adequately achieved shall be submitted to, and approved in writing by, the Local Planning Authority. The approved details shall be carried out prior to use of the development hereby approved and permanently maintained thereafter.

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

Secure by Design (post completion)

- 86) Within 3 months prior to first occupation of each phase of the development, a statement of whether 'Secure by Design' requirements have been adequately achieved and any further measures required to ensure those requirements will be achieved shall be submitted to, and approved in writing by, the Local Planning Authority.

Reason: To ensure that the development incorporates suitable design measures to minimise opportunities for, and the perception of crime and provide a safe and secure environment, in accordance with Policy D11 of the London Plan (2021), and Policies DC1, DC2 and DC8 of the Local Plan (2018).

No Advertisements

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

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

LANDSCAPING

Protection of Existing Trees

- 88) Prior to commencement each phase of the development hereby permitted, all the trees on the development site that have been identified for retention, shall be protected from damage in accordance with BS5837:2012 during construction works. No construction shall take place until any such trees are adequately protected as per BS5837:2012.

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

Replacement Trees, shrubs etc

- 89) All planting, seeding and turfing approved as part of the agreed soft landscaping scheme shall be carried out in the first planting or seeding seasons following the occupation of the buildings hereby permitted or the completion of the development, whichever is the sooner; and any trees or shrubs which die, are removed or become seriously damaged or diseased within 5 years of the date of the initial planting shall be replaced in the next planting season with others of similar size and species.

Reason: To ensure a satisfactory external appearance in terms of the provision of tree and shrub planting, in accordance with Policy G7 of the London Plan (2021) and Policies OS1, OS2, OS5, DC1, DC2, DC8 of the Local Plan (2018).

Soft and Hard Landscaping

- 90) Prior to first occupation of each phase of the development hereby permitted, details of the proposed soft and hard landscaping of all areas external to the relevant building or buildings shall be submitted to and approved in writing by the Local Planning Authority. The details shall include: planting schedules and details of the species (invasive species and avoid species due to pests and diseases etc), height and maturity of any trees and shrubs, including sections through the planting areas; depth of tree pits, containers, and shrub beds; details relating to the access of each building, including pedestrian surfaces, materials, kerb details, external steps and seating that ensure a safe and convenient environment for blind and partially sighted people.

Details shall also include details of ground cover for the Site of Importance for Nature Conservation (SINC) to be used as a 'forest school'. To qualify as a Forest School under the Forest School Association, the site needs to be 'woodland or natural environment'.

The landscaping works shall be carried out in accordance with the approved details and shall thereafter be permanently retained in this form.

Reason: To ensure a satisfactory external appearance of the development and relationship with its surroundings, and the needs of the visually impaired are catered for in accordance with the Equality Act (2010), Policies D5, G1, G5, G6 and G7 of the London Plan (2021), and Policies DC1, DC8, OS2 and OS5 of the Local Plan (2018).

Landscape Management Plan

- 91) Prior to commencement of landscaping works approved by Condition 89, a Landscape Management Plan shall be submitted to, and approved in writing by, the Local Planning Authority for all the landscaped areas. This shall include details of management responsibilities and maintenance schedules for all landscape areas. The landscape management plan shall be implemented in accordance with the approved details and shall thereafter be permanently retained in this form.

Reason: To ensure that the development provides an attractive natural and visual environment in accordance with Policies D5, G1, G5, G6 and G7 of the London Plan (2021), and Policies DC1, DC8, OS2 and OS5 of the Local Plan (2018).

Outdoor Play Spaces (Nursery & Community Centre)

- 92) Prior to first occupation of the Nursery Building and Community Centre in the development hereby permitted, a scheme detailing the size of play space, play equipment, boundary treatments and ground surface treatment of the outdoor play spaces shall be submitted to and approved in writing by the Local Planning Authority. Any play equipment must be designed to be fully inclusive to ensure the play areas are accessible to all and must be implemented in accordance with the approved plans, to be permanently retained thereafter.

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

Artificial Nesting Opportunities

- 93) Prior to first occupation of each phase of the development hereby permitted, details of 'artificial nesting opportunities' including bird and bat boxes within the development shall be submitted, and approved in writing by, the Local Planning Authority. The 'artificial nesting opportunities' shall be installed in accordance with the approved details prior to the first occupation of any building within that phase and shall be permanently maintained thereafter.

Reason: To ensure that satisfactory provision is made for 'artificial nesting opportunities' within the development thereby enhancing the biodiversity of the site in accordance with Policy G6 of the London Plan (2021), Policy OS4 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

BNG Biodiversity Gain Plan

- 94) Prior to commencement of the development hereby permitted within a Phase, a Biodiversity Gain Plan shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity gain plan must include:
- a. information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;
 - b. the pre-development biodiversity value of the onsite habitat;
 - c. the post-development biodiversity value of the onsite habitat;
 - d. any registered offsite biodiversity gain allocated to the development and the biodiversity and the biodiversity value of that gain in relation to the development;
 - e. any biodiversity credits purchased for the development;
 - f. a valid metric calculation attached in excel form, which demonstrates that the minimum 10% objective has been achieved; and
 - g. any such other matters as the Secretary of State may by regulations specify.

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Policies G1 and G6 of the London Plan (2021), Policy OS5 of the H&F Local Plan (2018) and Schedule 7A of the Town and Country Planning Act 1990.

BNG Habitat Management and Monitoring Plan

- 95) Prior to commencement of the development hereby permitted within a Phase, a Habitat Management and Monitoring Plan ('the HMMP') prepared in accordance with the approved Biodiversity Gain Plan shall be submitted and approved in writing by the Local Planning Authority. The HMMP should include:
- a. a non-technical summary;
 - b. the roles and responsibilities of the people or organisation(s) delivering the HMMP;
 - c. the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;

- d. accompanying plans of the site boundary, baseline and proposed habitats, provided in GIS format;
- e. the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- f. the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority,

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Policies G1 and G6 of the London Plan (2021), Policy OS5 of the H&F Local Plan (2018) and Schedule 7A of the Town and Country Planning Act 1990.

Habitat and Enhancement Works Compliance

- 96) Prior to the first occupation of each phase of the development hereby permitted, confirmation of the following shall be submitted to and approved in writing by the Local Planning Authority.
- a. the habitat creation and enhancement works set out in the approved HMMP have been completed; and
 - b. a completion report, evidencing the completed habitat enhancements, has been submitted to, and approved in writing by the Local Planning Authority.

The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP. Monitoring reports shall be submitted to the local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Policies G1 and G6 of the London Plan (2021), Policy OS5 of the H&F Local Plan (2018) and Schedule 7A of the Town and Country Planning Act 1990.

Ecological Impact assessment.

- 97) Prior to commencement of the development hereby permitted within a Phase, an Ecological Impact Assessment shall be submitted to and approved in writing by the Local Planning Authority. Details shall include locations of habitat provision (e.g. bat & bird boxes/bricks, log piles).

Fox dens have previously been recorded within the site. It is imperative that the recommendations regarding Fox dens are followed; where found they must be assessed for the presence of cubs. If cubs are present, the den should be left undisturbed until the cubs are old enough to disperse (in autumn).

Reason: To ensure that the development enhances biodiversity in accordance with Policy G6 of the London Plan (2021), Policy OS4 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

ACCESS

Inclusive Access Management Plan

- 98) Prior to the first occupation of each phase of the development hereby permitted, an Inclusive Access Management Plan for the relevant Phase of the development shall be submitted to and approved in writing by the Local Planning Authority. The plan shall set out a strategy for ongoing consultation with specific interest groups regarding accessibility of the relevant part of the site. The development shall not be operated otherwise than in accordance with the Inclusive Access Management Plan as approved and thereafter be permanently retained in this form.

Reason: To ensure that the proposal provides an inclusive and accessible environment in accordance with the Policies D5 and E10 of the London Plan (2021) and Policies DC1, DC2, DC8 and HO6 of the Local Plan (2018).

Entrances

- 99) The ground floor entrance doors to all publicly accessible parts of the buildings and integral lift/stair cores hereby permitted shall not be less than 1-metre-wide and the threshold shall be at the same level as the adjoining ground level fronting the entrances to ensure level access.

Reason: To ensure the development provides ease of access for all users, in accordance with Policy D5 of the London Plan (2021), and Policies DC1 and HO6 of the Local Plan (2018).

Lifts

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

Reason: To ensure that the development provides for the changing circumstances of occupiers and responds to the needs of people with disabilities, in accordance with Policy D5 of the London Plan (2021), and Policies DC2 and HO6 of the Local Plan (2018).

Fire Strategy

- 101) The development shall be carried out and completed in accordance with the submitted Fire Statement by BB7 (3 July 2024). The development shall be implemented in accordance with these details prior to occupation and shall thereafter be permanently retained in this form.

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

NURSERY / COMMUNITY CENTRE

Nursery/Community Use

- 102) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (“the 2015 Order”) or any statutory instrument revoking and re-enacting the 2015 Order with or without modification, the nursery and community centre hereby permitted shall be used for no other purpose (including any other purpose in Classes F1 and E[f] of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (“the 1987 Order”), or in any provision equivalent to those Classes in any statutory instrument revoking and re-enacting the 1987 Order with or without modification).

Reason: In granting this permission, the Local Planning Authority has had regard to the special circumstances of the case. Other uses within the same use Class or a Class to which the 2015 Order would otherwise authorise the use to be changed may be unacceptable due to effect on residential amenity or traffic generation, in accordance with policies

Community Use Facilities

- 103) Prior to first occupation of the Community Centre hereby permitted, a Community Facilities Strategy (CFS) shall be submitted to and approved in writing by the Local Planning Authority. The CFS shall provide details relating to securing access to the Community Use Building outside working hours by the local community and cultural groups / organisations. The development hereby permitted shall not be operated otherwise than in accordance with the CFS as approved.

Reason: To secure public access to the Community Use Building, provide a mix of facilities and to maintain a development that will contribute to the vitality of the Community Centre, in accordance with Policies DC8 and TLC1 and TLC2 of the Local Plan (2018).

Nursery Management Plan

- 104) Prior to first occupation of the Nursery Building hereby permitted, full details of a Nursery Management Plan for the school and associated community uses have been submitted to, and approved in writing by, the Local Planning Authority. Upon the commencement of the use, the Nursery Management Plan shall be implemented in full compliance with the approved details and shall thereafter continue to be fully implemented whilst the use remains in operation. Such details shall include information on the school hours of use; the number and times of recreation breaks; and a plan for staff supervision at arrival and leaving times and recreation times including after school and pre-school activities to include management of school for out of hours community uses.

Reason: To ensure that the use does not result in loss of amenity to neighbouring residents in terms of noise and disturbance, in accordance with Policies T1, HO11, CC10, CC11, CC12, CC13, of the Local Plan (2018).

RECOMMENDED REASONS FOR APPROVAL

- 1) **Land Use:** The proposed land use for Community Centre, Nursery and residential purposes are supported by adopted policy. Officers consider that the replacement nursery plus community uses, and residential use development is appropriate in this location. The proposals support existing residents by offering a mix of new housing options with varying sizes and tenures, promoting a more sustainable community. They will ensure adequate social, environmental, transport, and physical infrastructure, with facilities co-located for efficient use. The plans include creating a permeable street layout that integrates well with the surrounding area and maintaining certain commercial uses in zones less suitable for housing. The proposal is therefore supported in land use terms subject to the satisfaction of other development plan policies and is in accordance with the NPPF, Policies SD1 and H1 of the London Plan (2021); and Policies WCRA2, HO1, HO3 and HO4 of the Local Plan (2018).
- 2) **Affordable Housing:** The proposal would help to regenerate the wider area whilst maximising the value of the existing site. The development provides a policy compliant 50% of affordable housing on site. This is supported in order to maximise the delivery of much needed affordable housing within the borough. The proposal is therefore considered to be in accordance with the NPPF; Policies H1, H4, H6 and H10 of the London Plan (2021); and Policy HO3 of the Local Plan (2018).
- 3) **Housing:** The proposal would contribute to the overall housing delivery targets for the borough and the regeneration area. The proposal provides a range of unit sizes which are considered to respond positively to the site characteristics and the wider demographics and would lead to a development that would maintain a mixed and balanced ward. The residential element of the Proposed Development would provide private amenity for future occupants together with a high standard of residential accommodation. The density is acceptable, given the location and transport accessibility of the site and the acceptable quality of the residential accommodation, which will deliver 253 homes. The proposal is therefore supported and is considered to be in accordance with the NPPF; Policies H1, H4, H6 and H10 of the London Plan (2021); and Policies HO1, HO3, HO4, HO5 and HO6 of the Local Plan (2018).
- 4) **Design and Heritage:** The proposed scheme represents an opportunity to regenerate the site in accordance with the Council's Local Plan policies. It is considered that the proposal would result in an overall positive outcome in terms of its regeneration and in accordance with relevant national guidance and regional and local policies. The proposals are not considered to result in any harm to the setting of any heritage assets. Overall, having regard to the public benefits of the proposal, and applying the statutory provisions of

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF, the proposal is considered to be acceptable. The proposal is also considered to be in line with national guidance in the NPPF as a whole and with strategic local policies on the historic environment and urban design. Proposed Development is considered acceptable having regard to the NPPF, Policies D3, D4, D6, D8, D9 and HC1 of the London Plan (2021) and Policies DC1, DC2, DC3, DC4, DC7 and DC8 of the Local Plan (2018).

- 5) **Transport:** There would be no adverse impact on traffic generation and the scheme would not result in congestion of the road network as the proposals are secured as car permit free. Conditions would secure satisfactory provision of cycle and refuse storage, construction and logistics and management while a Travel Plan is secured by condition. Adequate provision for storage and collection of refuse and recyclables would be provided. The accessibility level of the site is very good and is well served by public transport. External impacts of the development would be controlled by conditions. In addition, servicing and road safety and travel planning initiatives would be implemented in and around the site to mitigate against potential issues. The Proposed Development therefore accords with Policies T1, T2, T3, T4, T5, T6, T6.1 and T7 and T9 of the London Plan (2021); and Policies T1, T2, T3, T4 and T5 of the Local Plan (2018).
- 6) **Impact on Neighbouring Properties:** The impact of the Proposed Development upon adjoining occupiers is considered acceptable with no significant worsening of noise/disturbance and overlooking, no unacceptable loss of sunlight or daylight or outlook to cause undue detriment to the amenities of neighbours. In this regard, the development would respect the principles of good neighbourliness. The Proposed Development therefore accords with Policies T4, D4, D11 and D14 of the London Plan (2021); and Policies CC11, CC13, DC1 and DC2 of the Local Plan (2018) and Key Principle HS6 and HS7 of the Planning Guidance SPD.
- 7) **Safety and Access:** A condition would ensure the development would provide a safe and secure environment for all users in accordance with London Plan Policy 7.3 and Policy DC1 of the Local Plan 2018. The development would provide 10% of all units as wheelchair units, level access, a lift to all levels and suitable circulation space. Level access will be provided to all school building entrances and from playground to outdoor classrooms. Conditions would ensure the proposal would provide ease of access for all persons, including disabled persons. Satisfactory provision is therefore, made for users with mobility needs, in accordance with Policies D5 and D11 of the London Plan (2021); and Policy H06 of the Local Plan (2018).

- 8) **Sustainability and Energy:** The application proposes a number of measures to reduce CO2 emissions with a carbon offset payment secured. A revised Sustainable Urban Drainage Strategy would be required by condition to reflect final design detail. The proposal would thereby seek to reduce pollution and waste and minimise its environmental impact. The Proposed Development therefore accords with Policies SI 2, SI 3, SI 4 and G5 of the London Plan (2021); and Policies CC1 and CC2 of the Local Plan (2018).
- 9) **Flood Risk:** The site is in Flood Zone 1. The development hereby permitted shall be carried out in accordance with the submitted Flood Risk and Drainage Strategy (July 2024) prepared by Waterman plus Flood Risk Assessment and Drainage Addendum (Feb 2025) prepared by Waterman. Sustainable drainage systems (SUDS) would be integrated into the development to cut surface water flows into the communal sewer system with further information on surface water drainage secured by condition. The development would therefore be acceptable in accordance with the NPPF; Policies SI 12 and SI 13 the London Plan (2021); and Policies CC3 and CC4 of the Local Plan (2018).
- 10) **Land Contamination:** Conditions will ensure that the site would be remediated to an appropriate level for the sensitive residential and open space uses. The Proposed Development therefore accords with Policy CC9 of the Local Plan (2018).
- 11) **Air Quality:** There will be an impact on local air quality because of the construction of the Proposed Development. However, conditions having effect prior to the commencement of above ground works for each phase of the development are proposed, to mitigate the impact of the development. During demolition and construction works, an Air Quality Dust Management Plan for construction works will be required by condition which will mitigate the air quality impacts of the development. In addition, a contribution toward the monitoring of air quality during the construction works to mitigate against potential issues is secured through the S106 Agreement. The Air Quality Assessment shows that there is no significant impact on local air quality during the operation phase. It is noted that there is not expected to be an exceedance of the one-hour objective at any onsite location where there is relevant exposure, and the air quality neutral target is met. As such the Proposed Development can accord with Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).
- 12) **Arboriculture, Ecology and Biodiversity:** As part of the development new trees/shrubs will be planted within the public realm and within the roof terraces. The new public realm incorporates recommendations to enhance the biodiversity value wildlife planting as part of the landscaping and a biodiverse roof. Conditions are secured to provide additional mitigation measures through the materials and landscaping and protection of neighbouring trees during construction works. Subject to the inclusion of conditions the Proposed Development accords with Policies D8, D9, G5 and G7 of the London Plan (2021) and Policies OS1 and OS5 of the Local Plan (2018) in terms of ecological and urban greening.

- 13) **Security:** No objections are received from the Designing Out Crime Officer. The overall security strategy and design intent is considered acceptable at this stage and the next stage of the process is to continue dialogue with the applicant and architects to agree the detail of measures to be incorporated within the development. A condition would ensure the development would provide a safe and secure environment for all users. The proposals are considered to be well designed and in accordance with the NPPF, Policy D11 of the London Plan (2021) and Policy DC1 of the Local Plan (2018).
- 14) **Mitigation Measures:** Proposals include 50% (measured by unit numbers) Affordable Housing, 10% Wheelchair User Dwellings, 215 trees within the local area, travel plans, carbon offset payment and local training, and employment opportunities and procurement are secured. The Proposed Development would therefore mitigate external impacts and would accord with Policy INFRA 1 of the Local Plan (2018).
- 15) **Objections:** Whilst many issues have been raised by objectors to the scheme it is considered, for the reasons explained in the detailed analysis, that planning permission should be granted for the application subject to appropriate safeguards to ensure that necessary controls and mitigation measures are established. This decision is taken on the basis of the proposed controls, mitigation measures and delivery commitments contained in the draft conditions and set out in this committee report, which are considered to provide an adequate framework of control to ensure as far as reasonably practicable that the public benefits of the scheme will be realised in accordance with relevant planning policies whilst providing the mitigation measures and environmental improvements needed to address the potential impacts of the development.
- 16) **Conditions:** In line with the Town and Country Planning Act 1990 and the Town and Country Planning (Pre-commencement Conditions) Regulations 2018, officers have consulted the applicant on the pre-commencement conditions included in the agenda and the applicant has raised no objections.
- 17) **The Development Plan:** The Proposed Development does not accord with the provisions of Policy OS2 (Access to Parks and Open Spaces) of the Local Plan which seeks to resist development on public open space of borough-wide importance as identified in the Council's Open Space Hierarchy as OS30 White City Community Garden, unless it can be demonstrated that such development will not harm its open character, and its function as a sport, leisure or recreational resource, and its contribution to biodiversity and visual amenity. The Proposed Development will reduce the open space in OS30 by 2,352 sqm (40.7%), which is contrary to Local Plan Policy OS2, as it impacts the open character of the space. However, this policy conflict is considered to be outweighed by the mitigating factors and public benefits the development will bring. In the light of the remainder policies referred to in the rest of this Report, the Proposed Development accords with the Development Plan taken as a whole.

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

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

Application form received: 2nd August 2024
Drawing Nos: As listed in condition 2 above

Policy documents:

National Planning Policy Framework (NPPF), 2024
The London Plan, 2021
LBHF - Local Plan, 2018
LBHF – Planning Guidance Supplementary Planning Document, 2018

Consultation Comments

Date:

Comments from:

Greater London Archaeology Advisory Service	20.08.24
Crime Prevention Design Advisor – Hammersmith	04.09.24
	10.03.25
Historic England London Region	15.08.24
	07.03.25
Greater London Archaeology Advisory Service	15.08.24
Active Travel England	15.08.24
	28.02.25
Sport England	14.08.24
Thames Water - Development Control	02.09.24
	07.03.25
UK Power Networks	16.08.24
White City Residents Association (WCRA Committee)	18.10.24
White City Community Centre India Way, W12	18.10.24
Director of Soup4Lunch Ltd. 57 Sedgeford Road, W12	17.10.24
Our Lady of Fatima, Commonwealth Avenue, W12	16.10.24
Somali Parents CIC, India Way, W12	25.11.24
UK Power Networks	04.03.25

Neighbour Comments

Letters Objecting:

White City Estate Residents

53 Mackay House White City Estate London W12	02.09.24
15 Cornwallis House London W12	13.09.24
Flat 12 Wolfe House White City Estate Shepherd Bush W12	28.08.24
Flat 34 Cornwallis House, White City Estate, India Way W12	21.08.24
19 Davis House Australia Road White City Estate W12	15.09.24

36 Hargraves House Australia Road London W12	28.08.24
34 Mackay House White City Estate London W12	28.09.24
16 Cornwallis House White City W12	27.09.24
40 Champlain House W12	24.08.24
50 Lawrence Close White City W12	03.10.24
Flat 23 Evans House Australia Road London W12	04.10.24
Flat 23 Evans House Australia Road London W12	21.03.25
110 Champlain House Australia Road White City W12	15.10.24
110 Champlain House Australia Road White City W12	29.01.25
18 MacKenzie Close White City W12	15.10.24
Flat 75, Champlain House, White City Estate w12	15.10.24
12 Mackay House W12	15.10.24
12 Mackay House W12	16.10.24
12 Mackey House W12	17.10.24
131 Bloemfontein Road White City Estate W12	15.10.24
131 Bloemfontein Road White City Estate W12	16.10.24
131 Bloemfontein Road White City Estate W12	30.01.25
7 Mackenzie Close White City Estate W12	16.10.24
7 Mackenzie Close, London W12 (duplicate)	16.10.24
34a Hargraves House White City W12	17.10.24
Champlain House, White City Estate W12	05.02.25

Beyond White City Estate

90 Wormholt Road London W12	31.08.24
57 Batman Close London W12	25.09.24
22 Batman Close London W12	21.08.24
88 Adelaide Grove London W12	22.09.24
70 Adelaide Grove W12	23.09.24
80 Batman Close White City W12	24.09.24
12 Wormholt Road London W12	09.10.24
38 Roxwell Road Ground Floor W12	09.10.24
19 Boscombe Road London W12	16.10.24
29 Ethelden Road London W12	16.10.24
50b Ormiston Grove Shepherds Bush W12	16.10.24

Letters in Support:

62 Ellenborough House, London N22	26.11.24
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Neutral Comments/Queries:

17 Hargraves House Australia Road London W12	30.08.24
No Address Given	04.10.24
38 Roxwell Road W12	09.10.24
10 Cobbold Road W12	16.10.24
21 Carteret House W12	17.03.25

1.0 BACKGROUND

Council's Building Homes and Communities Strategy

- 1.1** The White City Central project sits within the portfolio of Council-owned sites which form part of the Council's Building Homes and Communities Strategy where the Council will utilize its land and property assets to meet key administration priorities to deliver affordable housing and financially support the Council's services.
- 1.2** The Council's Building Homes and Communities Strategy seeks to: capitalise on the potential to renew key community assets so that they are modern, fit-for-purpose and which can support key outcomes in the community; leverage Council land to increase the supply of affordable homes, contributing to London Plan targets and the administration's commitment to delivery 1,500 new genuinely affordable homes, and; change the way the Council delivers services, so that they are focused in community locations.

2.0 SITE AND SURROUNDINGS

White City Estate

- 2.1** The White City Estate is a large housing development in the northern part of the borough. Founded on the site of the 1908 White City Exhibitions, where grand pavilions, displays and structures celebrated colonial and imperial Britain. The estate was built by the London County Council in the late 1930s. Twenty-three blocks were completed by the outbreak of the war, with the rest completed afterward. It is one of the largest local authority estates in the area, comprising approximately 2,000 homes along with various community facilities. The established landscape and robust, character architecture creates a strong feeling of place, enriched by its long-standing residents.
- 2.2** The estate is characterized by its consistent linear housing blocks, which have deck access walkways at every level on their street façades and balconies overlooking expansive lawn areas between blocks. The blocks are built in a red brick mix, with white painted deck soffits and white windows. Pitched roofs and tall chimney stacks create a distinctive roof line.

The Site

- 2.3** The Application Site, a 2.19-hectare area, is in the southern part of the White City estate. It is bordered by St John XXIII Catholic Primary School to the north, estate roads to the east and west, and the Mackay House and car parking spaces to the south.
- 2.4** The site features a mix of low-rise buildings, primarily single storey, in varying conditions, along with public, semi-private, and private open spaces. Some buildings are vacant. The site includes a designated Public Open Space and a Local Site of Importance for Nature Conservation (SINC). The area currently serves as a barrier to movement within the estate. There are two east-west routes through the site, with no publicly accessible north-south access.

- 2.5** A key feature of the site is Bridget Joyce Square, a pedestrianized and multifunctional public space on part of Australia Road. Located between the Randolph and Beresford Nursery and Early Years Centre and two playgrounds. The Council led project was opened to the public in 2015. Comprises permeable block paving and incorporates Sustainable Urban Drainage Systems (SuDS), including paving, rain gardens, trees and planted basins.

Site Designations

- 2.6** The site is within a London Plan 'Opportunity Area' for regeneration.
- 2.7** The site and wider area are subject to the following policy designations:
- a) White City Opportunity Area (London Plan designation).
 - b) White City Strategic Site Policy Area – Reference: WCRA2 (denoted by yellow dotted line and hatch).
 - c) Open Space – White City Community Garden, Reference: OS30 (denoted by green dotted line); and
 - d) Nature Conservation Area – White City Community Gardens, Reference: L1 (denoted by green hatch).

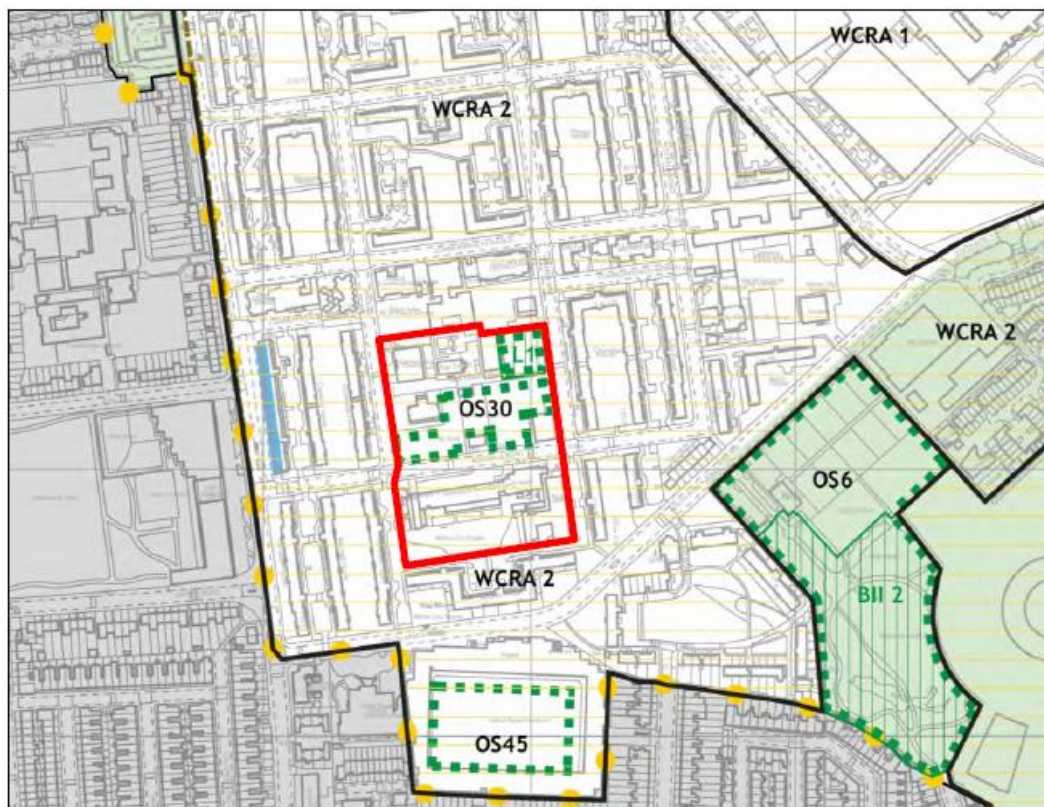


Figure: Hammersmith & Fulham Adopted Policies Map Extract

- 2.8** The Site is not located within a Conservation Area and its immediate surroundings do not include any Statutory Listed Buildings. The wider surrounding area includes the following designated heritage assets:

- a) Old Oak and Wormholt Conservation Area (110m to the west and 310m to the north of the Site).
- b) Wood Lane Conservation Area (110m to the east of the Site).
- c) Ingersoll and Arminger Conservation Area (260m to the south of the Site).
- d) BBC Television Centre – Grade II listed (280m to the east of the Site); and
- e) Pillar Box Outline No.49 Tunis Road – Grade II listed (320m to the south-east of the Site).

2.9 According to the Environment Agency's Flood Zone Maps, the Site is in Flood Zone 1 (low risk of flooding).

2.10 None of the existing trees on the Site are covered by a Tree Preservation Order (TPO).

2.11 The site is not located within an Archaeological Priority Area.

Transport

2.12 The site is located about 475 metres west of White City Station (Central Line) and 480 metres west of Wood Lane Station (Circle and Hammersmith & City Lines). Several bus routes, including 72, 95, 220, 228, 272, 283, and N72, serve the nearby South Africa Road, Wood Lane, Bloemfontein Road, and the Westway (A40), with multiple stops within walking distance of the site.

2.13 Currently, the site has a Public Transport Accessibility Level (PTAL) ranging from 1b to 2, on a scale of 0 to 6b (0 being very poor and 6b excellent). However, improvements on completion of the nearby EdCity development will raise the PTAL to 4, significantly enhancing public transport accessibility. According to TfL's 'Time Mapping' the site is highly accessible, ensuring future residents can easily reach various destinations via sustainable transport options.

2.14 The closest underground station, White City Underground, is located approximately 700m to the east of the site and is on the London Central Line.

2.15 The Site is located within Controlled Parking Zone (CPZ) O (Monday to Saturday 9am to 5pm).

Nature Conservation & Trees

2.16 There are no statutory designated nature conservation sites within the site boundary, although there is one statutory site (Wormwood Scrubs Local Nature Reserve) within a 1km radius, along with nine non-statutory Sites of Importance for Nature Conservation (SINCs) in the same area. Additionally, five internationally protected sites are located within a 20km radius, including Richmond Park, Wimbledon Common, Lee Valley, South-West London Waterbodies, and Epping Forest.

- 2.17** The application site includes the White City Community Gardens SINC, which is designated as a Nature Conservation Area of Local Importance in the Local Plan. This SINC, covering approximately 1,250 sqm, is located at the site's northeast corner.
- 2.18** An arboricultural survey conducted in April 2024 identified 113 individual trees, 17 tree groups, and 5 hedges on the site. Of these, 2 trees are classified as Category A (high quality), 9 trees and 3 groups as Category B (moderate quality), 88 trees, 13 groups, and 5 hedges as Category C (low quality), and 14 trees and 1 group as Category U (poor condition, recommended for removal).

Air Quality

- 2.19** The site lies within the Hammersmith & Fulham Air Quality Management Area (AQMA), which has exceeded air quality standards for nitrogen dioxide (NO₂) and particulate matter (PM₁₀) due to traffic emissions.

3.0 SITE HISTORY

- 3.1** The area's planning history comprises of the planning permissions for the Randolph and Beresford Centre, White City Health Centre, Hammersmith North Housing Office, White City Community Centre, One O'clock Club, and the White City Adventure Playground and Building. However, this is not considered relevant to the current proposals.
- 3.2** An **Environmental Impact Assessment (EIA) Screening Opinion** was issued on 7 August 2023 (Ref: 2022/00623/SCREIA) pursuant to Regulation 6 of the Town and Country Planning (EIA) Regulations 2017 for; the proposed redevelopment of the site involving; demolition of the existing buildings and; erection of 8 new buildings ranging from 1 to 9 storeys in height to provide approximately 270 residential units, 1,600 sqm of community space, a replacement nursery, a Multi-Use Games (MUGA), outdoor children's play facilities, and hard and soft landscaped public open space.
- 3.3** It was considered that the Proposed Development, as set out in paragraph 3.2 above, is not likely to result in significant adverse effects on the environment by virtue of factors such as its nature, size, or location, with appropriate mitigation in place. The Site is not within, near or close to a sensitive area and does not meet with the criteria set out within Schedule 2 of the Regulations. The scheme would not be unusually complex and would not have potentially hazardous environmental effects. The potential effects of the proposal are considered likely to be of a more localised nature and not so significant in terms of their magnitude/extent or sensitivity to warrant a full assessment by way of an Environmental Statement.
- 3.4** It was considered that all the localised impacts relating to the Proposed Development could be satisfactorily assessed by way of supporting reports that should be submitted with any detailed planning application. Therefore, in accordance with Regulation 6 of the EIA Regulations 2017, officers

agreed with the applicant's screening opinion that the Proposed Development does not warrant an EIA.

4.0 PROPOSED DEVELOPMENT

- 4.1** This application seeks planning permission for the demolition of the existing buildings and structures and the redevelopment of the site, delivering eight new buildings ranging from 1 to 6 storeys, to provide 253 residential units (Use Class C3), a new children's day nursery (Use Class E) and a new community centre (Use Class F), with associated refuse storage, cycle parking and Blue Badge car parking, together with the provision of an all-weather games pitch, outdoor children's play facilities, and new hard and soft landscaped public open space.
- 4.2** The Proposed Development will be delivered over two main phases (north/south of Bridget Joyce Square) of the development, with Phase 1 covering the northern half of the Site and including the nursery, Community Hub and Blocks B and C, and with Phase 2 covering the southern half of the Site and including Blocks D, E, F and G.
- 4.3** The proposals also include the erection of a temporary community centre building (Use Class F) on part of the site.



Figure 1: Site Plan



Figure 2: Aerial View

Community Centre and Nursery

- 4.4** The proposals for the site include the development of a new, purpose-built Community Hub, offering 1,559 sqm of community space to accommodate existing services. The ground floor will feature a cafe accessible from both Bridget Joyce Square and the Adventure Playground, serving as a central point for the community. Additionally, there will be a large, double-height community hall, spaces for Special Educational Needs (SEN) services, changing facilities, and a new UK Power Networks substation. The first floor will house a community centre, family centre, the One O'clock Club, Hammersmith and Fulham Housing Office, and an outdoor play area. The roof will include an all-weather games area, replacing the current pitch.
- 4.5** The development includes a new day nursery, located at the site's north-west corner, replacing the Randolph and Beresford Early Years Centre. The nursery will be accessed from India Way. Located to minimize disruption to the existing nursery by allowing demolition and redevelopment to occur while the nursery continues to operate. The new nursery will provide 1,574 sqm of space, a 10% increase in nursery floorspace, and will also maintain the same amount of outdoor space. The adjacent White City Community Gardens Nature Conservation Area will be incorporated into the nursery's outdoor teaching and recreation areas to enhance its forest school curriculum.
- 4.6** To ensure uninterrupted service during construction, temporary facilities will be provided for some of the existing community uses, allowing community groups and services to continue operating on-site. The temporary structure will be located at the south-east corner of the site. Final details would be secured through planning conditions.



Image 1: View of hub from redesigned Bridget Joyce Square

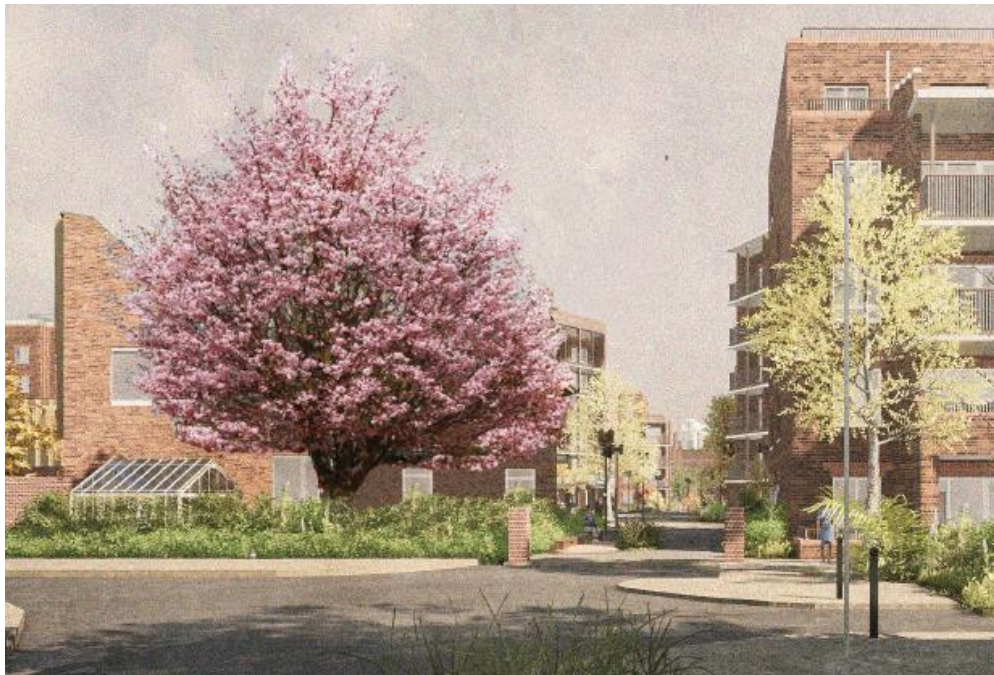


Image 2: View of hub and community garden from India Way



Image 3: View of nursery from India Way



Image 4: View of nursery from forest play area

Residential Provision

- 4.7** The Proposed Development will provide 253 new homes, with 127 of these designated as affordable housing, making up 50% of the total units. The affordable housing will be split according to policy guidelines, with 60% allocated to social rented tenure and 40% to intermediate tenure.

Unit Size	Market Tenure	Social Rent Tenure	Intermediate Tenure	TOTAL
1 bed	68 (54%)	22 (29%)	21 (41%)	111 (44%)
2 bed	49 (39%)	22 (29%)	28 (55%)	99 (39%)
3 bed	8 (6%)	27 (35%)	2 (4%)	37 (15%)
4 bed	1 (1%)	5 (7%)	0 (0%)	6 (2%)
TOTAL	126 (100%)	76 (100%)	51 (100%)	253 (100%)

Table 1: Housing Tenure Mix

- 4.8** The homes will feature a variety of unit sizes across all tenures, designed to meet or exceed the minimum internal floor space and outdoor amenity requirements outlined in the London Plan and local planning guidelines. Each home will include a private amenity space and access to extensive landscaped community areas within the development. Additionally, 77% of the homes will be dual-aspect, and the design will incorporate modern energy-efficient features, such as mechanical ventilation and heat recovery systems (MVHR), to minimize energy consumption and reduce costs.
- 4.9** All units will be flats, with the following distribution:
- 111 units (44%) as 1-bed.
 - 99 units (39%) as 2-bed.
 - 37 units (14%) as 3-bed.
 - 6 units (2%) as 4-beds.
- 4.10** All the proposed units meet or exceed the National Technical Standards, in terms of overall unit sizes and the internal space standards of individual rooms and storage space. Each unit will have a private amenity space (terrace or balcony) that exceeds the minimum standards.
- 4.11** The development will provide accessible homes, with 27 homes (11%) designed to meet the highest accessibility standards (Part M4(3)) of the Building Regulations) and 226 homes (89%) designed to meet the adaptable standards (Part M4(2)).

Temporary Community Building

- 4.12** A temporary community centre is proposed on the site of the disused health centre to temporarily house the One O'clock Club (OOC), Randolph Beresford Family Annexe (RBFA) and White City Community Centre (WRCA) whilst the wider masterplan is under construction.



Image 5: Location of the proposed temporary community building

Bridget Joyce Square

- 4.13** The Site includes a central area of public open space known as Bridget Joyce Square, which comprises a pedestrianised section of public highway on Australia Road, together with the area of land in front of the Randolph and Beresford Nursery and Early Years Centre. The space is predominantly comprised of a paved surface and includes a number of Sustainable Urban Drainage Systems (SuDS) features, including permeable paving, rain gardens and planting.
- 4.14** The landscape strategy comprises a hierarchy of open spaces based on accessibility that have been designed to meet the diverse needs of the various different users of these spaces. The centrepiece is a new Bridget Joyce Square, which as with the existing Bridget Square is located at the centre of the site. The new Bridge Joyce Square has been designed as a flexible, multi-use space that includes outdoor seating, mature tree planting, planted pockets with a new 'wiggly wall' that references the current square, and a new outdoor gym. The space prioritises pedestrian movement and vehicle access is limited to a turning head and loading bay on the southern side of the square.

Existing Car Parking

- 4.15** In order to provide the access to the south of the site and improve the public realm a total of 19 parking spaces will be removed and re provided for residents of the White City Estate, located adjacent to Mackay House. A total of 3 parking spaces will also be re-provided on site for the nursery and 3 parking spaces provided for the community hub.

Highway Stopping Up Order

- 4.16** As part of the redevelopment of the site, existing areas of public highway would be stopped up, reverting the land to public local authority ownership, which would allow the construction of new buildings and improvements to the public realm. All of Australia Road that falls within the site red line boundary is proposed to be stopped under the Section 247 of the Town and Country Planning Act 1990. The Stopping Up order will be made upon planning permission. Pedestrian and Cycle access will be maintained following the stopping up so the stopping up of Australia Road will not impact upon its existing operations from a transport perspective.

Submitted Documents

- 4.17** The following documents have been submitted in support of the applications

- Cover Letter, 31 July 2024
- Architectural Drawings
- Air Quality Assessment
- Arboricultural Implications Assessment
- Biodiversity Enhancement Strategy
- Biodiversity Net Gain Assessment
- BREEAM Pre-assessment
- CIBSE TM45 Report
- Circular Economy Statement
- Community Centre Travel Plan
- Construction Logistics Plan
- Daylight and Sunlight Assessment (Neighbouring Properties)
- Daylight and Sunlight Assessment (Internal)
- Delivery and Servicing Management Plan
- Demolition Logistics Plan
- Design, Landscape and Access Statement
- Detailed Fire Strategy – Community Hub
- Detailed Fire Strategy
- Detailed Fire Strategy
- Ecological Impact Assessment
- Energy Strategy Report
- Equality Impact Assessment
- Financial Viability Appraisal
- Flood Risk Assessment and Drainage Strategy

- Framework Demolition and Construction Environmental Management Plan
- Gateway One Form
- Housing Quality Mark (HQM) Report
- Internal and External Lighting Report
- London Plan Fire Statement
- Noise Assessment
- Non-domestic Overheating Assessment
- Nursery Travel Plan
- Operational Waste Management Strategy
- Parking Design and Management Plan
- Phase 2 Ground Investigation Report
- Phase 3 Remediation Strategy
- Planning Statement
- Plant Noise Assessment
- Residential Travel Plan
- Statement of Community Involvement
- Statement of Community Involvement Addendum
- Summer Overheating Assessment
- Sustainability Statement
- Transport Assessment
- Ventilation Report
- Whole Lifecycle Carbon Assessment

4.18 The following revised and updated documents were submitted on 24 February 2025.

- Landscape Planning Addendum
- Arboricultural Statement Addendum
- Biodiversity Net Gain (BNG) Addendum
- Updated Statutory Biodiversity Metric Calculation Tool spreadsheet
- Updated Energy Strategy Report
- Updated GLA Energy Memo
- Updated Circular Economy Statement
- Updated GLA Circular Economy Template
- Updated GLA Circular Economy Memo
- Pre-redevelopment Audit by WPS
- Updated Whole Life Carbon Assessment
- Updated GLA Whole Life Carbon Memo
- Updated BRREAM Pre-assessment
- Updated HQM Pre-assessment
- Transport and Highways Technical Note
- Updated Operational Waste Management Strategy
- Flood Risk Assessment and Drainage Strategy Addendum
- Foul Flow Letter by Curtins

5.0 PUBLICITY AND CONSULTATION

- 5.1** The Applicant has undertaken a comprehensive programme of community and stakeholder engagement including discussion with community groups and residents on the estate and surrounding the site.

Pre-Application Public Engagement

- 5.2** In accordance with the National Planning Policy Framework (NPPF revised December 2024), the Applicant has engaged with the Local Planning Authority (LPA) and a number of other statutory consultees to ensure an integrated design process prior to the submission of this planning application.
- 5.3** The Applicant has discussed the evolving proposals with the London Borough of Hammersmith & Fulham Planning. In addition, the Applicant has sought to engage the local community, details of which are provided in the Statement of Community Involvement and the Statement of Community Involvement Addendum submitted in support of this application.
- 5.4** This engagement has included discussions with staff and governors at the Randolph and Beresford Early Years Centre, local community operators and groups, the Disability Forum Planning Group, local Designing Out Crime Officers, and the White City Estate Residents' Advisory Panel. Their feedback has been integral in shaping the submitted proposals.
- 5.5** The application proposals have also been refined based on extensive pre-application discussions with the Local Planning Authority (LPA) and the Greater London Authority (GLA), which included a series of meetings and workshops held between September 2020 and June 2024.
- 5.6** The timeline for engagement activities mirrored the design stages:
- Autumn: gathering community priorities
 - Winter 2020/21: design options 1
 - Spring 2021: design options 2
 - Spring/ summer 2022: preferred option
 - Winter 2022: pre planning exhibition
 - Winter 2022/23: submit planning application
- 5.7** The Applicant involved residents in:
- 18 Awareness raising and insight gathering activities
 - 13 Co-production sessions on key themes
 - 10 Activities with targeted audiences
 - 11 Exhibition events
 - 18 Resident Advisory Panel meetings
 - 26 Sessions with on-site operators
 - 25 Meetings with other community and council stakeholders.

On-site Operators

- 5.8** The Applicant facilitated 19 sessions with On-site operators and a further 12 sessions with stakeholders within the Council and 13 sessions specifically around the nursery re-provision. Further activities and conversations around finalising the design were handled by the design team and the Council.

Design Review Panel (DRP)

- 5.9** Given the site's prominence, the design underwent independent scrutiny through presentations to the Council's Design Review Panel (DRP). The proposal scheme was presented to the Design Review Panel twice as part of the pre-application process. The first review took place on 14 September 2021. The second review on 1 March 2022.
- 5.10** The initial DRP session focused on establishing design principles, such as layout, mass, and scale. During the second review, the panel noted that the scheme had developed significantly from the first (Design Principles stage) review and consequently commented that the scheme was underpinned by a much-improved set of design principles, which provide a coherent and legible masterplan, and a clear heart to the White City Estate.
- 5.11** Overall, the panel were encouraged by the evolution of the scheme and consider the masterplan has a successful coherence and legibility. The panel felt the scheme could provide a high-quality outcome to both the community-focused and residential elements of the development. The scheme was working hard to reaffirm the character of the site and the wider White City estate. Fundamentally, the character areas proposed seem well resolved and clearly illustrate the functions of the different areas of the development.
- 5.12** The panel however, noted that further work was required to provide additional detailing and enhancement to the appearance of the residential components of the scheme; this alongside review of the landscaping and vehicular access/servicing components of the scheme would also be welcomed to create the highest quality of place.
- 5.13** Landscaping - The panel suggested that further work was required to integrate between areas of landscaping and the ground floor elements of each building to ensure that the character of the development is strengthened through the relationship between spaces and the buildings that enclose them. Bridget Joyce Square was referenced as a key area for further review, to ensure that the scale of the square and interaction with vehicle access/service routes is successful to avoid conflict between these elements, prioritising the pedestrian/community use of the space.
- 5.14** Architecture and appearance - The panel felt the general façade treatment of the scheme could also be finessed to reaffirm and ensure the quality of these blocks through careful consideration of the detail and proportionality to the residential buildings; furthermore, ensuring that balconies appear as integrated parts of individual buildings and strengthening the palette of materials to anchor the development within the wider White City estate.

5.15 Parking - The panel questioned whether options have been explored to accommodate some of this parking within the surrounding streets. Generally, the panel felt that this could be an appropriate solution to improve the local street environment and could be linked to landscaping improvements around the edges of the development.

5.16 Officer comments – following the presentation of the scheme to the panel, there have been several revisions to the proposal scheme which serve to respond to the comments of the panel and feedback from design officers. As such, it is considered that the updated design strategy as presented in the current application submission serves to respond positively to many of the comments raised by the panel and provides a high-quality design solution. Detailed comments upon design are provided in the body of this report for further consideration.

Inclusive Design Review Panel

5.17 The proposal scheme was presented to the Inclusive Design Review Panel in July 2023.

5.18 The panel welcomed the design principles of the scheme including the provision of new housing, community facilities, and provision of open and play space for all ages.

5.19 The panel noted that there has been production undertaken as part of the scheme development, but suggested that the development team should seek opportunities for a wider co-production group of a representative group of residents and community groups with lived experience to work together on specific design and construction issues, whilst also looking as to how shared community facilities could be delivered to maximise the opportunities of a new purpose built buildings on a smaller footprint. However, the panel recognised that this element of the scheme is challenging.

5.20 Furthermore, the panel made several recommendations including:

- Suggestions that the scheme should be informed by lived experience of residents reflected in final inclusive design proposals, e.g. housing layouts, Design and Access Statements, and fire evacuation strategies etc.
- Consideration of the impact of inclusive design throughout the lifetime of the development, and it was considered important to consider possible mitigations early to barriers identified by residents and community groups. e.g. air quality and noise during construction.
- Landscape design of the scheme is an important consideration and should be designed to be as inclusive as possible. Review should be undertaken to ensure pavements with dropped kerbs at crossing points with tactile paving provided for both the new road from Canada Way and throughout Bridget Joyce Square.

- Management of vehicular servicing within Bridget Joyce Square, requires clear signage and tactile paving to alert users of this space of these movements and ensure that vulnerable pedestrians feel safe when crossing the site.
- Housing design and layouts should be reviewed to ensure that all units achieve key space requirements and that accessible units should comply with wheelchair accessible housing standards.
- Welcomed the provision of a new community hub and suggested that the internal layout of this element should be subject of further review to minimise travel distances within the individual buildings, to ensure that spaces at upper floor levels including offices/meeting rooms are accessible to all future users of the building. Further attention should be given to how the buildings work inclusively and are managed, when either of the lifts breaks down.

5.21 Furthermore, the landscape design of the scheme, particularly within Bridget Joyce Square has been fundamentally reviewed to provide more legible, direct and safer routes throughout this key space. Detailed comments upon inclusive and accessible design principles of the scheme are provided in the body of this report for further consideration.

5.22 Officer comment: following the presentation of the scheme to the panel, there have been several revisions to the proposal scheme which serve to reflect upon the recommendations of the panel and feedback from design officers. As such, it is considered that the updated design strategy as presented in the current application submission serves to resolve many of the comments raised by panel members. There have been additional co-production activities in advance of the application submission and key details including internal layouts of both the residential and community buildings have been updated in response to the panel comments.

Secured by Design

5.23 The applicant states that each stage of the design development process has been informed by consultation with the Borough Designing Out Crime Officers (DOCOs), whose comments and recommendations have been taken on board and shaped the submitted proposals. The scheme has been designed with the intent of attaining 'Silver' Secured by Design certification.

5.24 Key feedback from the DOCOs that has been incorporated into the scheme design. A number of recommendations relating to the security of the ground floor public realm in order to reduce opportunities for anti-social behaviour have been implemented. Further changes have been made to the design of communal entrances, resident access, visitor access, mail delivery, cycle stores, bin stores, plant rooms, ground floor windows/doors and balconies.

Application Stage

- 5.25** The planning application has been publicised by the Council as the local planning authority, in accordance with statutory requirements.
- 5.26** The application has been advertised on the following basis:
- The Proposed Development is a major development.
 - The Proposed Development may affect the setting of conservation areas and other designated heritage assets.
 - The Proposed Development does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated. This is pursuant to the provisions of Policy OS2 (Access to Parks and Open Spaces) of the Local Plan which seeks to resist development on public open space of borough-wide importance as identified in the Council's Open Space Hierarchy as OS30 White City Community Garden.

RESIDENTS

First Public Consultation (21 August to 16 October 2024)

- 5.27** The application was advertised by way of site notices posted around the site (dated: 21 August 2024) and a publicised press notice (14 August 2024) with an expiry date for comments of 4 October 2024. In addition, 2,210 individual notification letters were sent to neighbouring properties.

Second Public Consultation (8 January to 29 January 2025)

- 5.28** The purpose of this consultation was to advise that the Council had uploaded additional information relating to the planning application. This information related specifically to residential block 'Block F'; comprising floor plans, sections and elevations (uploaded 10/12/2024); Energy Strategy Report (10/12/2024); and Equality Impact Assessment (11/12/2024).

Third Public Consultation (28 February to 21 March 2025)

- 5.29** The purpose of the third consultation was to advise that the Council had received amendments to the proposals, comprising revisions made to the proposed landscaping scheme within Bridget Joyce Square and updated supporting technical documents (Landscape Addendum; Arboricultural Statement; Biodiversity Net Gain; Energy Strategy Report; Circular Economy Statement; Whole Life Carbon Assessment; Updated BREEAM Pre-assessment; Home Quality Mark Pre-assessment; Transport and Highways Technical Note; Operational Waste Management Strategy; Flood Risk Assessment and Drainage Strategy; and Foul Flow Letter).
- 5.30** The proposed design changes are limited to minor amendments to the landscaping scheme within Bridget Joyce Square, comprising:
- a) Moving the vehicular turning head further south to provide more space for pedestrians within Bridge Joyce Square.
 - b) The creation of a more direct and legible east/west pedestrian route through the space.

- c) Maximising new planting within the square.
- d) Increasing new tree planting (with 6no. additional trees).
- e) The creation of a planted buffer along the northern edge of the turning head to provide protection and visual screening.
- f) The omission of the secondary access to the Community Hub and with an increase in planting to provide a green setting to the boule area within the square; and
- g) The relocation of the planting and signage at the western entrance to Bridget Joyce Square from India Way.

5.31 All the representations received up to the publication of the report have been recorded and are summarised below.

- 30 Objections
- 1 Supporting letter
- 4 Neutral comments/queries

5.32 The various objections are summarised under the following categories:

- **Lack of Consultation and Transparency:** The development process has been marked by manipulation and false promises, with residents claiming they were never properly consulted or involved in decision-making. There is criticism of the lack of a promised residents' steering committee and the trivial matters residents were consulted on, like the colour of doors, instead of more significant decisions.
- **Non-Residents in Key Roles:** The development committee includes non-residents, such as Father Richard Nesbitt, who are making decisions that directly impact those who live in the area. Residents feel that those without a personal stake in the community should not have such influence.
- **Enduring Disruption:** Residents, especially those affected by the Ark Swift development, have endured years of disruption, noise, and pollution. The prospect of continued disruption from the new development is causing significant distress to those already impacted.
- **Heartless Evictions and Community Disruption:** The Council has been accused of evicting vulnerable residents, such as a terminally ill caretaker, and closing vital community resources like the White City Adventure Playground and the One O'Clock Club, which have provided essential services for families, especially those with disabled children.
- **Loss of Community and Green Spaces:** The removal of vital green spaces, including children's play areas, is a major concern. Bridget Joyce Square and other spaces that foster community interaction are threatened by the development. The destruction of 80 mature trees and the relocation of the Randolph Beresford Nursery are also criticized.
- **Environmental and Infrastructure Concerns:** No studies have been conducted on the environmental or infrastructural impacts, including the potential strain on already overstretched services like healthcare, transportation, and sewage systems. There are concerns about increased pollution and the loss of biodiversity.

- **Affordable Housing Concerns:** The Council's claim that the development will provide affordable housing is questioned. The "Right to Buy" legislation could lead to these affordable homes being sold into private ownership, undermining long-term housing solutions for the community.
- **Overdevelopment and Poor Design:** The Proposed Development is considered too large for the area, with buildings that are out of sync with the existing estate. There are concerns about overcrowding, insufficient disabled access, and emergency access during construction.
- **Flooding and Drainage Issues:** The estate already suffers from frequent flooding due to an outdated drainage system, and the addition of new housing units is expected to exacerbate these issues.
- **Discontent with the Consultation Process:** The consultation process is described as a "sham," with a lack of meaningful engagement and misrepresentation of community feedback. The Resident Advisory Panel (WCERAP) was seen as ineffective, with its role limited to a "sounding board" rather than a decision-making body.
- **Alternative Development Proposals:** Instead of focusing on large-scale new developments, some residents suggest improving existing structures, such as installing lifts in buildings without them or developing unused roof spaces.
- **Increased Strain on Local Services:** Concerns are raised about the strain the new development will place on already struggling services, such as medical facilities, policing, and social care.
- **Overall Opposition to the Development:** Many residents are strongly opposed to the development, feeling that it prioritizes financial gain over the well-being of the existing community, and they demand a reconsideration of the proposal that respects the needs of current residents.

COMMUNITY GROUPS

White City Residents Association

- 5.33 The consultation process for the White City Central (WCC) development is criticized for being exclusionary, incomplete, and not truly involving the community. Key concerns include a lack of collaborative approach ('co-production'), miscommunications, and the marginalization of local residents. Notably, WCRA state that they were not invited to engage in the statutory consultation stage, and many local people were unaware of the project or its scale. The choice of the name "White City Central" led to confusion, and the consultation did not prioritize or effectively engage with the local community, including rejecting engagement through WCRA Open Meetings for extended periods. The White City Estate Resident Advisory Panel (WCERAP) was also misrepresented as having a decision-making role, when it was only a sounding board for consultation, not involved in shaping the development itself. The presentation of the consultation process as co-production was misleading, as local residents had minimal influence over the actual plans for WCC.

- 5.34** The WCRA also made comments on behalf of the White City Community Centre, opposing the proposed demolition and redevelopment of the White City Community Centre for several reasons. They argue that the planned Community Hub does not provide a like-for-like replacement of the existing Centre, that the needs of its users have not been adequately considered and that there has been a lack of meaningful consultation with the community. The WCRA also expresses concerns about the integration of the Community Centre with other statutory services, which could create stress for residents. They feel that the design process has been inadequate, with minimal input from them and other relevant stakeholders, and that the Hub's design does not address the practical and emotional needs of the people who rely on the Centre. Additionally, the WCRA highlights issues such as accessibility and conflicting services being housed in the same building, which could make it harder for vulnerable residents to access support.

Somali Parents CIC

- 5.35** A representative of Somali Parents CIC strongly supports the proposed redevelopment of the White City Estate. The project addresses housing and community needs by providing 253 residential units, with 50% as social and affordable housing. It includes new facilities like a children's nursery, community centre, and sports pitch, improving the quality of life for residents, especially families. The temporary community centre ensures continuity of services. The project has broad community support, especially from the Somali community, and is seen as a vital opportunity for better housing and facilities. The commenter urges swift approval from the planning committee.

STATUTORY CONSULTATIONS

Greater London Authority (GLA) Stage 1 Referral

- 5.36** London Plan policies on estate regeneration, social infrastructure, equality, affordable housing, urban design, heritage, transport, environment and sustainable infrastructure are relevant to this application. The GLA confirms that whilst they support the proposals in principle, the application does not fully comply with these policies, as summarised below. The GLA concludes that possible remedies set out in their report could address these deficiencies.
- a) Land Use Principles: The proposed optimisation of this existing estate for a residential-led mixed use development in an opportunity area with new high-quality community floorspace is strongly supported in principle, subject to the affordable housing and community uses being appropriately secured.
 - b) Equality: An Equalities Impact Assessment (EqIA) should be prepared in support of the application.
 - c) Affordable housing: The proposal delivers 127 affordable housing units (54% by habitable room), with a tenure split of 64% social rent / 36% London Shared Ownership. Subject to acceptable affordable tenures, the proposals may be eligible to follow the fast-track route. An Early-Stage Viability Review is required to be secured.

- d) Urban Design and heritage: There are no design issues of strategic concern. Clarification on the provision of evacuation lifts is required. No harm would be caused to the significance of heritage assets and as such, the development complies with London Plan Policy HC1.
- e) Transport: £125,000 should be secured towards the step-free access and capacity scheme at White City London Underground station. Issues identified in the road safety audit and the findings of the Active Travel Zone assessment should be addressed.
- f) Environment and sustainable infrastructure: Further information on the proposed energy strategy, whole life-cycle carbon assessment, and circular economy assessment are required. A commitment to post-completion reporting prior to occupation on whole life-cycle carbon and circular economy matters should be secured. Further information on urban greening and biodiversity is required.

Historic England (GLAAS)

- 5.37** GLAAS considered the proposals with reference to information held in the Greater London Historic Environment Record and made available in connection with this application and conclude that the proposals are unlikely to have a significant effect on heritage assets of archaeological interest and don't recommend any archaeological conditions to be attached to any approval. GLAAS confirmed that the Site is not in an Archaeological Priority Area.

Historic England (HE)

- 5.38** HE provides advice when their engagement can add most value and they confirmed in this case they are not offering advice.

Thames Water (TW)

- 5.39** TW raise no objection to the proposals but made the following comments.

- a) Waste Comments: With regard to Combined Wastewater network infrastructure capacity, TW do not have any objection to the planning application, based on the information provided. The Proposed Development is located within 15 metres of a strategic sewer and TW requests that a condition be attached to any approval requiring the submission of a Piling Method Statement for approval.
- b) Groundwater discharges: TW would like an informative be attached to any approval advising that a Groundwater Risk Management Permit is required from TW for discharging groundwater into a public sewer.
- c) Surface Water: TW advises that if the developer follows the sequential approach to the disposal of surface water, they will have no objection.
- d) Water Comments: With regard to water network infrastructure capacity, TW requests that a condition be attached to any approval requiring the submission of Foul Water Capacity. TW recommend an informative be attached to any approval stating that TW will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the Proposed Development.

Transport for London (TfL)

5.40 TfL raise no objection to the proposals but made the following comments.

- a) Stopping Up: The proposed stopping up of Australia Road is acceptable in strategic transport terms, with 24/7 pedestrian and cycle access and maintenance to be secured in planning permission.
- b) Impact Assessment and Public Transport Mitigation: The trip generation estimation is reasonable, with £125,000 sought for station improvements, including step-free access at White City LU station, in line with London Plan policies T3 and T4.
- c) Cycle Parking: The Transport Assessment ("TA") confirms compliance with London Plan cycle parking standards, with design details to be provided prior to determination to ensure proper accommodation for all users.
- d) Car Parking: A total of 32 parking spaces are proposed, including spaces for disabled parking, electric vehicle charging, and specific re-provisioning for the nursery and community hub. A parking management plan should be secured as part of any permission.
- e) Healthy Streets / Active Travel Zone (ATZ) Assessment: Vehicle access will be rationalized, and pedestrian/cyclist access increased, with a positive overall impact on Healthy Streets indicators. Improvements identified in the ATZ assessment should be secured through financial contributions or works.
- f) Demolition and Construction Logistic Plan: Demolition and construction principles align with TfL guidance, with vehicle routings, timings, and logistics plans to be agreed with LBHF, and a full plan to be secured by condition.
- g) Travel Plans and Delivery and Servicing Plans: Travel and servicing plans for all occupiers should be secured as part of any permission, in accordance with London Plan policy T4.

Active Travel England

5.41 Given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. ATE and TfL have also been consulted via the Stage 1 referral to the Mayor of London.

UK Power Network

5.42 UK Power Network requested that access to the substations will not be affected by the building works/alterations, as UK Power Networks require access 24/7.

Sport England

5.43 Sport England advises that:

- a) If the development involves the loss of a sports facility, it should be assessed against Paragraph 103 of the National Planning Policy Framework (NPPF) and local policies on social infrastructure, as well as any approved Playing Pitch or Built Sports Facility Strategies.

- b) If new sports facilities are being provided, they should align with local strategies and be designed following Sport England's or relevant National Governing Body guidelines.
- c) The development of additional housing will increase demand for sports facilities. If existing facilities can't meet this demand, new or improved facilities should be provided in accordance with local policies and strategies.
- d) The NPPF and PPG highlight the importance of promoting healthy lifestyles, especially in new housing developments, and Sport England's Active Design guidance should be considered to encourage physical activity through design.

Design Out Crime Officer (Met Police)

5.44 The Design Out Crime Officer confirms that the development has the potential to achieve Secured by Design (SBD) accreditation and makes the following recommendations.

- a) Fobs for stair lobbies should grant access only to residents of the respective floor, not all residents in the block.
- b) The community centre should have a glazed secure entrance lobby with two access control points, as per Youth and Community Centre Safety Scheme (YACCSS) guidance.
- c) A staff member behind a protected reception desk should be able to lock down the lobby if needed.
- d) Fire doors should be equipped with contact alarms.
- e) Ongoing consultation with the applicant and relevant authorities is recommended to ensure the building obtains SBD certification before occupation or use.

6.0 POLICY CONTEXT AND PLANNING CONSIDERATIONS

Planning Framework

6.1 The Town and Country Planning Act 1990 (referred to as 'the Act'), the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011 are the principal statutory considerations for town planning in England and Wales. Collectively, the three Acts create a 'plan led' system, which requires local planning authorities to determine planning applications in accordance with an adopted statutory Development Plan, unless there are material considerations which indicate otherwise (section 38(6) of the 2004 Act as amended by the Localism Act).

6.2 In this instance the statutory development plan comprises the London Plan 2021 and the Local Plan 2018. There is also the Planning Guidance Supplementary Planning Document 2018 (hereafter referred to as Planning Guidance SPD).

National Planning Policy Framework 2024 (NPPF)

6.3 National Planning Policy Framework 2024 (NPPF) is a material consideration in planning decisions. The NPPF, as supported by the Planning Practice Guidance (PPG), sets out national planning policies and how these are expected to be applied.

6.4 The NPPF does not change the statutory status of the development plan as the starting point for decision making. Proposed Development that accords with an up-to-date Local Plan should be approved and Proposed Development that conflicts should be refused unless other material considerations indicate otherwise.

6.5 All planning policies in the NPPF, London Plan 2021, Local Plan 2018 and Planning Guidance SPD which have been referenced where relevant in this report, have been considered with regards to equalities impacts through the statutory adoption processes, and in accordance with the Equality Act 2010 and Council's PSED. Therefore, the adopted planning framework which encompasses all planning policies which are relevant in officers' assessment of the application are considered to acknowledge protected equality groups, in accordance with the Equality Act 2010 and the Council's PSED.

The London Plan (2021)

6.6 The London Plan (2021) was published in March 2021 and is the Spatial Development Strategy for Greater London. The proposals have been assessed in line with the updated policies set out in the Plan. Together with the Local Plan, the London Plan forms the Development Plan.

LBHF Local Plan (2018)

6.7 The Local Plan (February 2018) sets out the Council's vision for the borough until 2035. It contains development policies to be used by the Council in helping to determine individual planning applications. The Local Plan should be read and considered alongside the London Plan and will be supplemented by supplementary planning documents (SPDs) including the Planning Guidance SPD.

Planning Considerations

6.8 The following sections consider the following key planning considerations:

- Principle of Development
- Layout, Height, and Massing
- New Housing (Density, Housing Mix, Affordable Housing, Tenure, Affordability, Delivery, Financial Viability Assessment)
- Standard of accommodation (Security, Internal size layout, Aspect, Amenity space, Accessible Homes, Privacy, Daylight/Sunlight (within the development))
- Landscape and Play Space
- New School
- Design, Appearance and Heritage (Scale and Massing, Architectural Character, Heritage and Townscape, Application site – Heritage constraints, Demolition of the buildings currently occupying the site,

- other heritage assets impacted by the proposals, Townscape, Conclusion)
- Amenity Impacts (Overlooking/Privacy, Daylight, Sunlight, and Overshadowing, Daylight and Sunlight, Daylight Assessment, Open Space/Overshadowing, Conclusion)
- Highways and Transport (Access, Car Parking, Cycle Parking, Trip Generation, Healthy Streets, Construction Logistics, Delivery and servicing, Travel Plan, Mitigation)
- Sustainability and Energy
- Flood Risk Drainage and Water Resources
- Waste and Recycling
- Ground Conditions
- Air Quality
- Noise and Vibration
- Ecology
- Archaeology
- Fire Safety
- Designing out crime
- Socio Economics / Social Value

PLANNING ASSESSMENT

7.0 PRINCIPLE OF DEVELOPMENT

Policy Context

- 7.1 The NPPF 2024** states that applications should be considered in the context of a presumption in favour of sustainable development and that development proposals which accord with the development plan should be approved without delay. This means that planning decisions should generally lean towards approving development proposals that align with the principles of sustainable development, unless there are strong reasons to refuse based on national policies or significant adverse impacts outweighing the benefits; essentially prioritizing development that considers economic, social, and environmental factors equally. The NPPF requires planning policies and decisions to give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.
- 7.2 NPPF Para. 61** states: “to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”
- 7.3 NPPF Section 8** seeks promotion of healthy and safe communities. Para. 96 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction and enable and support healthy lives. Para. 98 states that to provide the social, recreational

and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision of shared spaces and community facilities.

7.4 NPPF Para. 100 states that LPAs should take a proactive, positive and collaborative approach to meeting the requirement for a sufficient choice of early years. places to meet the needs of existing and new communities.

7.5 NPPF Paras. 103 – 108 promote access to open space and recreation.

The London Plan (2021)

7.6 The London Plan Policy focuses on optimising brownfield sites, particularly for new housing development, removing the restrictive density matrix and placing the emphasis on design-led sustainable development. The following strategic policies are considered most relevant to the application:

7.7 Policy GG2 (Making the Best Use of Land) sets out the criteria that must be addressed in order to create successful sustainable mixed-use places that make the best use of land. This includes

- enabling the development of brownfield land, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites.
- prioritising sites which are well-connected by existing or planned public transport.
- 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; and
- applying a design-led approach to determine the optimum development capacity of sites.

7.8 Policy GG4 (Delivering the Homes Londoners Need) sets out the criteria that must be addressed in order to create a housing market that works better for all Londoners. This includes:

- ensuring that more homes are delivered; and
- supporting the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable.

7.9 Policy GG6 (Increasing efficiency and resilience) states that those involved in planning and development must:

- seek to improve energy efficiency and support the move towards a low carbon circular economy.
- ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards, while mitigating and avoiding contributing to the urban heat island effect.
- create a safe and secure environment which is resilient the impact of emergencies.

- take an integrated and smart approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.

7.10 Policy D3 (Optimising Site Capacity through a Design-led Approach) requires all development to make the best use of land by following a design-led approach. This policy contains a number of design principles which developments should incorporate, which whilst not repeated verbatim, are summarised below:

- Enhance the local context by delivering buildings which respond to local distinctiveness and character through their layout, orientation, scale, appearance and shape, whilst having regard to the existing and emerging street hierarchy, building types, forms and proportions.
- Be of high design quality, using attractive and robust materials.
- Be street-based with a clearly defined public and private environment.
- Deliver appropriate outlook, privacy and amenity.

7.11 Policy H1 (Increasing Housing Supply) set out annualised housing targets for London Boroughs over the next 10 years, with a strategic target to deliver 64,935 homes in London per annum. The Borough of Hammersmith & Fulham has been assigned with a ten-year housing target of 16,090. To optimise the potential for housing delivery, the Plan promotes delivery of housing on small sites, brownfield land, in areas with PTAL equal or superior to 3, on car park and low-density retail park sites, on public sector owned sites, and on identified industrial sites.

7.12 Policy S3 (Education and childcare facilities) aims to guide the development of education and childcare facilities to meet community needs effectively. Facilities should have entrances and playgrounds away from busy roads and link to footpath and cycle networks to encourage active travel for children. Designs should support shared use for community and recreational purposes, be inclusive and accessible to all, and incorporate outdoor space. Ideally, facilities should be situated near parks or green spaces, and existing facilities should not be reduced unless future demand is lacking.

7.13 Policy S4 (Play and informal recreation) addresses the need for play and informal recreation spaces, especially in developments used by children and young people. It calls for increased opportunities for play and independent mobility and ensures residential developments include at least 10 square meters of accessible, quality play space per child. Play areas should integrate with the surrounding neighbourhood, be safe and inclusive, and be accessible from the street.

7.14 Policy S5 (Sports and recreation facilities) focuses on sports and recreation facilities, encouraging accessible locations connected by public transport, walking, and cycling routes. The policy promotes multi-use facilities and collaboration between schools, universities, and community providers, as well as supportive measures like sports lighting where appropriate. Existing sports and recreational spaces should be preserved

unless assessments show they are no longer needed, are replaced with equivalent facilities, or the new development provides greater community benefits through alternative sports or recreational uses.

The Hammersmith & Fulham Local Plan (2018)

- 7.15 Policy HO1 (Housing Supply)** states that the Council will work with partner organisations and landowners to exceed the London Plan (2016) minimum target of 1,031 additional dwellings a year up to 2025 and to continue to seek at least 1,031 additional dwellings a year in the period up to 2035. It adds that new homes to meet London's housing need will be achieved by a number of measures, including the development of windfall sites.
- 7.16 Policy CF1 (Supporting Community Facilities and Services)** states that Council will work with its strategic partners to provide borough-wide high quality accessible and inclusive facilities and services for the community. Supplementary Planning Documents and Guidance

Principle of Residential / Mixed-Use Development

Policy Context

- 7.17 NPPF Paragraph 8** emphasizes the importance of supporting vibrant communities by providing a sufficient number and range of homes to meet the needs of current and future generations. Paragraph 61 highlights the need to significantly boost the supply of homes by ensuring sufficient land is available where it is needed. Paragraph 125 encourages the development of under-utilized land and buildings to meet housing needs, especially in areas with constrained land supply. Paragraph 128 advocates a positive approach to alternative uses of developed land to meet identified development needs, supporting proposals that make efficient use of sites providing community services, such as schools, while maintaining or improving service quality and access to open space.
- 7.18 The London Plan** sets an ambitious ten-year housing target for the borough of 16,090 new homes (1,609 new homes annually). This is an increase from the current adopted London Plan target of 1,031 new homes annually. Policy H1 sets out that for these housing targets to be met, boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites. Sites with existing or planned PTALs of 3-6 are identified specially as a potential source of increased housing capacity.
- 7.19 London Plan Policy GG2** states that to create successful sustainable mixed-use places which make the best use of land.
- 7.20 Local Plan Policy HO1** states that the Council will work to exceed the London Plan (2016) minimum target of 1,031 new homes per annum. Given this version of the London Plan is replaced, the Council should now be aiming to provide 1,609 new homes annually, an uplift of 578 new homes.

- 7.21 London Plan Policy H1** sets a ten-year housing target for the borough of 16,090 new homes, emphasizing the need to optimize brownfield sites and areas with high public transport accessibility levels (PTAL 3-6). Policy HO1 aims to exceed the previous target of 1,031 new homes annually, now targeting 1,609 new homes per year as required by the London Plan 2021.
- 7.22 Local Plan Policy WCRA** outlines that development proposals within the WCRA should contribute to the creation of 6,000 new homes across a range of tenures and the creation of 10,000 jobs, primarily in White City East, but also through smaller-scale developments in White City West.
- 7.23 Local Plan Policy WCRA2** further states that the Council will collaborate with estate residents and other stakeholders to facilitate estate renewal and build a sustainable community. This policy emphasizes that development within White City West should allow existing residents to remain in the area, offering a more sustainable community by providing new housing options with diverse tenures and unit sizes to increase housing choice.

Assessment

- 7.24** The proposals are for the demolition of the existing buildings and the redevelopment of the site with the erection of 8 new buildings ranging from 1 to 6 storeys to provide 253 residential units, a new day nursery, community centre, outdoor play and recreation facilities including an outdoor games pitch, together with new high-quality landscaped public open space.
- 7.25** The Proposed Development would generate a significant number of jobs throughout the demolition and construction programme (including jobs for local residents) that would “help to build a strong, responsive and competitive economy”. The proposed new homes will also provide a significant contribution towards the local economy, which is discussed further under Part (iv) below.
- 7.26** The Proposed Development would regenerate a currently under-utilised site with a high-quality, residential-led mixed-use development that would deliver jobs, homes, a new nursery, community facilities and environmental improvements. The proposals would enhance the townscape and contribute towards a “strong, vibrant and healthy” community by fostering “well-designed, beautiful and safe places”.
- 7.27** By placing sustainability at the heart of the project, the proposals would make a contribution to tackling climate change by “making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.
- 7.28** It is, therefore, clear that the White City Central proposals represent a highly sustainable form of development and so, in accordance with paragraph 11 of the NPPF, there should be a presumption in favour of planning permission being granted.

- 7.29** In responding to the London Plan requirements, the Site represents a location where The London Plan calls for significant growth: it is brownfield; within an Opportunity Area; and is well connected. Furthermore, it is located within an area which has been identified by the local planning authority as appropriate for estate renewal. Accordingly, it is clearly a requirement for the project to make the best use of land by optimising the development capacity of the site in order to achieve these sustainable development objectives as set out in The London Plan and the Council's strategy for the borough.
- 7.30** The Proposed Development would make better and effective use of brownfield land to create homes that would directly support the economic growth and competitiveness of the capital and support the regeneration of inner London generally. In doing so it can unlock social benefits and enable opportunities for environmental improvements.
- 7.31** In summary, the principle of a residential development is considered to be in line with the core planning principles in the NPPF which places particular focus of stimulating economic growth. The provision of the additional employment connected with the construction, design, and development processes (including on-going project management and open space maintenance) would be considered to encourage economic growth in accordance with the NPPF.

Principle of Redevelopment of Community and Nursery Uses

- 7.32** **NPPF Section 8** promotes healthy and safe communities, including community facilities and early years places.
- 7.33** **London Plan Policy S1**, Part D, supports development that optimizes land use, including co-locating social infrastructure and sharing facilities. Part F allows the loss of social infrastructure in areas of need only if re-provision plans are in place or if it's part of a broader public service transformation to modernize facilities. Part G encourages reusing redundant social infrastructure for other social purposes before considering alternative developments, unless it's part of a wider transformation plan.
- 7.34** **London Plan Policy S3** mandates that development projects should not result in a loss of education or childcare facilities. The supporting text underscores the critical role of high-quality education in enhancing life opportunities and promoting social mobility. It also emphasizes the importance of well-designed educational facilities for creating an effective learning environment.
- 7.35** **Local Plan Policy CF1** seeks to ensure the retention and enhancement of existing healthcare facilities, protect all existing community facilities and aims to improve school facilities.

7.36 The Site presently includes the following community facilities:

- a) One O'clock Club – 52 sqm (Use Class F)
- b) Family Annexe – 261 sqm (Use Class F)
- c) White City Adventure Playground Building – 288 sqm (Use Class F)
- d) White City Community Centre – 422 sqm (Use Class F)
- e) Randolph and Beresford Early Years Centre (nursery) – 1,434 sqm (Use Class E)
- f) Hammersmith & Fulham Housing Office – 1,082 sqm (ancillary residential)
- g) Former White City Health Centre (vacant) – 850 sqm (Use Class E)
- h) Over 50s Centre (vacant) – 164 sqm (Use Class F)

7.37 All the existing buildings are low-rise (and predominantly single storey) and vary in age and condition, with several buildings either underutilised or vacant. As such, the current use and configuration of the site represents a highly inefficient use of public land. In accordance with London Plan Policy S1, the application proposals represent an important opportunity to consolidate and co-locate the existing community uses within a high-quality, purpose-built Community Hub that is better able to meet the current and future needs of both the local community and the operators themselves.

7.38 The proposed Community Hub will provide 1,559 sqm of new, high-quality community space to accommodate the existing operators and services.

7.39 The proposals include the loss of the former White City Health Centre (Use Class E) and in accordance with Local Plan Policies CF1 and CF2, the application is accompanied by evidence demonstrating that there is no longer any identified need for this facility and associated services. As such, it is considered that the loss of the former White City Health Centre is acceptable in planning terms, on the basis there is no longer any identified need for the facility and the services have since relocated to a nearby, purpose-built medical facility, in accordance with the requirements of Local Plan Policies CF1 and CF2.

7.40 The proposals also include the provision of a new day nursery, to replace the existing Randolph and Beresford Early Years Centre, which is currently located at the southern end of the Site. The new nursery is located at the north-west corner of the Site and is principally accessed from India Way. The location of the new nursery, together with the phasing strategy for the development, seeks to minimise and mitigate potential disruption to the existing nursery by enabling the northern part of the site to be demolished and redeveloped whilst the existing nursery remains in operation. Once the new nursery building is complete, the Randolph and Beresford Early Years Centre will then relocate directly into their new building.

- 7.41** The proposed nursery building provides 1,574 sqm nursery floorspace (Use Class E) and the proposals will therefore deliver in a 10% net increase nursery floorspace at the Site. The proposals will also re provide the existing quantum of outdoor space for the nursery (which is subject to a separate Section 77 process). It is also proposed for the existing White City Community Gardens Nature Conservation Area (Reference: L1), which is located at the north-east corner of the Site, to form part of the new outdoor teaching and recreation space for the nursery, which will support and enhance the nursery's forest school curriculum.
- 7.42** In summary, the proposals will result in the demolition of a disparate group of low-rise community buildings of varying ages and condition, some of which are underutilised or vacant, and will provide high-quality replacement facilities in the form of a purpose-built Community Hub and new nursery, the design of which has been developed through an extensive co-production process with the local community and key local stakeholders. The proposed facilities will provide a significantly improved standard of accommodation within highly sustainable new buildings and will ensure that these vital community services are secured in the long-term.

Principle of Temporary Community Use

- 7.43** To ensure the continuity of service to the local community during the construction period, it is proposed to provide temporary facilities for the existing community uses. This will enable the existing community uses and groups to decant into a temporary structure and continue to operate on-site until such a time as the new Community Hub is operational, into which they will finally relocate. It is proposed that the temporary accommodation will be provided in the form of a temporary structure (i.e. portable buildings) on the site of the former White City Heath Centre building, located at the south-east corner of the site. Illustrative details of the temporary Community Hub, including plans, elevations and an area schedule, are provided in Section 8.0 of the Design, Landscape and Access Statement. It is anticipated that the final details of the proposed temporary community use and associated structure will be secured via planning condition.
- 7.44** On balance, it is concluded that the principle of the Proposed Development, subject to appropriate conditions, would accord with National Policies within the NPPF, London Plan 2021 and Policies H01, H03, DC1, DC2 and DC3 of the Local Plan 2018. The proposal would also assist with achieving the regeneration aspirations for the site and wider area and resulting significant public benefits in accordance with the Local Plan 2018.

8.0 LAYOUT, HEIGHT, AND MASSING

Layout

- 8.1** All existing buildings and structures on the site will be demolished to make way for new educational and residential spaces.
- 8.2** The Design and Access Statement submitted in support of this application reveals multiple layout options were considered.
- 8.3** The proposed masterplan is based on six key principles:
- 1) Responding to local character - Reflecting the area's architecture and history.
 - 2) Growing the community - Strengthening community bonds with a community centre, nursery, and open play spaces.
 - 3) Enhancing connections, views, and light - The building layout improves connections and creates open spaces.
 - 4) Landscape-led design - The landscape and architecture seamlessly blend for interactive spaces.
 - 5) Activating ground floor spaces - Ground floor layouts are designed to energize the streets and courtyards through active uses.
 - 6) Creating a cohesive urban space - The plan integrates residential, community, open, and play spaces into a unified design.
- 8.4** Additionally, the masterplan ensures the re-provision of vital services and infrastructure, including the children's nursery, community facilities, open spaces, and recreation areas, while providing new homes.
- 8.5** The Proposed Development includes eight buildings: six residential blocks, a central Community Hub, and a new day nursery. The residential blocks follow a mansion block typology, with a rectilinear, north/south orientation, maximizing light and dual-aspect units through chamfered projections. The layout mirrors the existing White City Estate, with linear blocks separated by tree-lined streets and open spaces.
- 8.6** The Community Hub is centrally located, consisting of two angled volumes that enclose the adventure playground and activate the public space in Bridget Joyce Square. The nursery is positioned at the north-west corner, featuring an L-shaped design with outdoor play spaces on the roof and ground level, including the existing SINC, to support its 'forest school' curriculum.
- 8.7** Officers consider that the layout of the scheme would provide a positive contribution towards the wider area and integrate the development within the surrounding context.

Height, Scale and Massing

- 8.8** The Proposed Development is designed to complement the surrounding Estate's scale, which generally features buildings of 5 storeys. The residential blocks are 4 storeys high, with a set-back 5th storey on the east and west sides (Blocks C, D, and G), and 5 storeys with a set-back 6th storey on the south side (Blocks E and F). Overall, the proposal reflects the height and scale of nearby buildings.
- 8.9** The development increases in height towards the centre of the site, where its impact on the surrounding area is minimal, with Block B reaching 6 storeys. The new nursery is 1 to 2 storeys high, while the Community Hub is 2 storeys with an enclosed roof space that includes a new all-weather sports pitch.
- 8.10** Extensive pre-application discussions with the Local Planning Authority and the Design Review Panel have ensured the height, scale, and massing are suitable for the site.
- 8.11** Officers conclude that the proposal optimizes the site's use and aligns well with the surrounding townscape, complying with Local Plan policies DC1 and DC8.

9.0 NEW HOUSING

- 9.1** **Paragraph 61 of the NPPF** supports the Government's objective of significantly boosting the supply of homes and seeks to ensure that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay
- 9.2** **Paragraph 64 of the NPPF** states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site.
- 9.3** **Paragraph 125 of the NPPF** promotes and supports the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively.
- 9.4** At the regional level, the **London Plan** emphasises the need for more homes in the capital at a range of tenures and of a range of sizes. As such there are several planning policies that seek to support the development of residential properties across the city.
- 9.5** **London Plan Policy GG4 (Delivering the homes Londoners need)** seeks to create a housing market that works better for all Londoners and create mixed and inclusive communities that meet high standards of design and provide for identified housing needs. **Policy H1** recognises the pressing unmet need for housing across London and sets out the strategic approach for significantly increasing housing supply. In Hammersmith and Fulham,

Table 4.1 of the London Plan specifies a minimum ten-year housing target of 16,090 homes, which is equivalent to 1,609 homes per annum (which represents a substantial 56% increase from the previous London Plan annual monitoring target of 1,031 new homes).

- 9.6 Local Plan Policy HO1 (Housing Supply)** supports the delivery of new housing but is predicated on the housing target derived from the previous version of the London Plan. The housing target outlined in Policy HO1 is therefore superseded by the more up to date requirements of Policy H1 of the London Plan.

Density

- 9.7** The London Plan focuses on optimising brownfield sites, particularly for new housing development, removing the restrictive density matrix and placing the emphasis on design-led sustainable development.
- 9.8 London Plan Policy GG2 (Making the Best Use of Land)** sets out the criteria that must be addressed to create successful sustainable mixed-use places that make the best use of land. This includes
- enabling the development of brownfield land, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites.
 - prioritising sites which are well-connected by existing or planned public transport.
 - proactively exploring 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; and
 - applying a design-led approach to determine the optimum development capacity of sites.
- 9.9 London Plan Policy GG4 (Delivering the Homes Londoners Need)** sets out the criteria that must be addressed to create a housing market that works better for all Londoners. This includes:
- ensuring that more homes are delivered; and
 - supporting the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable.
- 9.10 London Plan Policy D3 (Optimising site capacity through the design-led approach)** does not seek to rigidly apply a density matrix but rather states that development proposals ‘must make the most efficient use of land and be developed at the optimum density’ (with consideration being given to site context, connectivity and accessibility, and the capacity of surrounding infrastructure). Proposals that do not demonstrably optimise the housing density of a site should be refused, and greater scrutiny of design is required the greater the level on density.
- 9.11 Local Plan Policy HO4 (Housing quality and density)** 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. According to TfL's 'Time Mapping' the Site is highly accessible, ensuring future residents can easily reach various destinations via sustainable transport options. The Site currently has a Public Transport Accessibility Level (PTAL) range rating of 1b to 2 but improvements from the nearby EdCity development will raise the PTAL to 4.

9.12 The proposed scheme will deliver 253 units with 697 habitable rooms. This represents a density of 116 units per hectare (u/ha) and 318 habitable rooms per hectare (hr/ha). The following density factors that have been considered as part of the design-led approach are assessed under other sections of this report as follows:

- a) Form and Layout
- b) Experience – (safety, security, inclusive design, housing quality and residential amenity)
- c) Quality and character
- d) Neighbour amenity
- e) Transport infrastructure
- f) Green infrastructure
- g) Social infrastructure

9.13 Assessment of these factors demonstrates that the application scheme will optimise the development potential of the site and result in a high-quality development.

9.14 Officers are mindful of the fact that density is a guide to ensure optimisation of brownfield sites, and other issues should be considered, such as quality of design, sensitivity of works, new linkages and public routes through the site and other regeneration benefits of the scheme. Both London Plan 2021 and Local Plan 2018 policies are clear that density ranges should not be applied mechanistically, and developments should make efficient use of land to optimise housing delivery. Overall, the proposed density is considered acceptable, given the high quality of design (discussed further below), the site's characteristics, its capacity to accommodate growth and the fact that the proposal takes the form of a mid-rise development, in line with Policy HO4.

Housing Mix

9.15 The NPPF requires local planning authorities to deliver a wide choice of high-quality homes and to plan for a mix of housing in terms of size, type, tenure and range based on local demand.

- 9.16 London Plan Policy H10 (Housing size mix)** considers that schemes should consist of a range of unit sizes and should seek to deliver mixed and inclusive neighbourhoods. The policy further acknowledges the role that an appropriate housing mix can play in optimising the housing potential on sites. The supporting policy text also recognises that well designed 1 and 2-bed units have an important function as they can attract those wanting to downsize from their existing homes and free up existing family housing stock. 2-bed/4-person units are further considered to play a role in delivering homes which are suitable for families.
- 9.17 Local Plan Policy HO5 (Housing Mix)** sets out the housing mix which developments should aim to meet subject to viability, locational characteristics and site constraints being considered on a site-by-site basis.

Unit Type	Affordable Rent	Intermediate	Market
1 Bed	10%	50%	A mix of unit sizes including larger family accommodation
2 Bed	40%	35%	
3 Bed	35%	15%	
4 Bed	15%		

Table 2: Proposed Housing Mix

- 9.18** The proposed mix of unit sizes considered the local housing needs within the White City Estate, as the provision of a higher proportion of 1 bed social rented units will help alleviate some of the existing housing issues on the Estate, which includes a number of overcrowded homes, as well as a number of under-occupied family sized homes, which can be freed up by enabling the existing tenants to down-size. The proposed mix also seeks to provide a balanced mix of social rented units overall, including a high proportion of family sized social rent homes
- 9.19** The housing mix for the Proposed Development is stipulated in the following table:

Unit Type	Number	Percentage
1 Bed	111	44%
2 Bed / 3 Person	99	39%
3 Bed / 4 Person	37	15%
4 Bed / 6 Person	6	2%
Total	253	100%

Table 3: Dwelling Mix of Proposed Development

- 9.20** The social rented tenure dwellings propose a small over-provision of 1-bed units and a slight under-provision of 2-bed and 4-bed units, while precisely meeting the target for 3-bed units. These deviations from the targets are intentional, as the mix has been designed to meet the housing needs of current Estate residents on the housing list. This approach addresses local

demand, helps reduce overcrowding, and will free up under-occupied family homes within the existing Estate.

9.21 For the intermediate tenure dwellings, the proposal includes a small under-provision of 1-bed and 3- & 4-bed units, with a slight over-provision of 2-bed units.

9.22 Officers consider that the proposed range of unit types will create a balanced community. The proposed mix is acceptable and considers the wider strategic requirements of the Council in accordance with the NPPF, Policy H10 of the London Plan 2021 and Policy HO5 of the Local Plan 2018.

Affordable Housing

9.23 **Paragraph 64 of the NPPF** states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site.

9.24 **London Plan Policy H4 (Delivering affordable housing)** sets a minimum threshold of 50% affordable housing provision on public sector land where there is no portfolio agreement with the London Mayor.

9.25 **London Plan Policy H5** sets out the Threshold approach to applications. Supporting paragraph 4.5.3 clarifies that the percentage of affordable housing on a scheme should be measured in habitable rooms, however it may also be appropriate to measure the provision using habitable floorspace and that the affordable housing figures should be presented as a percentage of total residential provision in habitable rooms, floorspace and units to enable comparison.

9.26 **Policy HO3 of the Local Plan (Affordable Housing)** states that affordable housing will be sought on all developments capable of providing 11 or more self-contained dwellings and will be negotiated based on a borough wide target of 50% provision.

9.27 A total of 253 residential units would be delivered of which 127 (50%) would be provided as affordable units. The remaining 126 units would be provided for private sale.

9.28 The Proposed Development would provide 50.2% affordable housing provision when measured by unit number. The proposed quantum would therefore meet the 50% affordable housing provision required by the London Plan and the Local Plan.

Tenure

9.29 **London Plan Policy H6 (Affordable housing tenure)** describes the preferred affordable housing tenure arrangements across London, which comprises 30% low-cost rented homes, 30% intermediate products and 40% to be determined by the borough. All affordable homes are expected to meet the Mayor's definition of 'genuinely affordable homes.' **Policy HO3 of the Local Plan** defines the Council's preferred affordable tenure split as

60% social/affordable rented accommodation and 40% intermediate tenure homes.

- 9.30** The proposed accommodation schedule, setting out the proposed unit numbers, mix and tenure is provided in Table 4 below.

Unit Size	Social Rent	Intermediate	Private Sale	Total
1-bed/2-person	22	21	68	111
2-bed/3-person	22	28	49	99
3-bed/4-person	27	2	8	37
4-bed	5	0	1	6
Total no. units	76	51	126	253
% units	30%	20%	50%	100%

Table 4: Proposed Accommodation Schedule

- 9.31** For the 127 affordable units, 76 would be provided at Social Rent levels and 51 would be provided as Shared Ownership units. This equates to a tenure split within the affordable provision of 60% Social Rent and 40% intermediate tenure (S/O) when measured by unit.

- 9.32** The affordable housing unit mix is provided in Table 5 below.

Unit Size	Social Rent		Intermediate		Total 127 units %
	Proposal	Policy	Proposal	Policy	
1-bed	29%	10%	41%	50%	34%
2-bed	29%	40%	55%	35%	39%
3-bed	35%	35%	4%	15%	23%
4-bed	7%	15%			4%
	100%	100%	100%	100%	100%

Table 5: Proposed Housing Mix by Tenure

- 9.33** The supporting text (paragraph 6.53) to Local Plan Policy H05 acknowledges that for the intermediate housing, the Council's SHMA has identified a high need for 1-bedroom properties (64%) and 2-bedroom properties (30%), based on the Council's HomeBuy Register. The proposed unit mix will deliver 34% one-bedroom units and 39% two-bedroom units.
- 9.34** Officers consider that with regards to affordable housing mix, the Proposed Development is in line with Policy HO5 of the Local Plan 2018 and Policy H6 the London Plan 2021.

Affordable Housing Affordability

- 9.35** For the units to be delivered as Social Rent and the rent would be in line with the prevailing benchmarks set out in the Local Housing Allowance (LHA) (currently £140-£155 per week for a one bed, £160-£175 for a two bed and £185-£205 for a three bed). These weekly rents are exclusive of service charge.
- 9.36** The Shared Ownership units would be available to households with a combined per annum income of up to circa £90,000 which is in accordance with the London Plan 2021.
- 9.37** The Proposed Development is considered to be in accordance with Policies H4 and H6 of the London Plan 2021, Policies HO3 of the Local Plan 2018 Policy HO3, and The Affordable Housing and Viability Supplementary Planning Guidance (SPG) 2017.

Affordable Housing Delivery

- 9.38** It is currently anticipated that the Proposed Development will come forward as two phases and the indicative delivery programme for the development has been estimated at approx. 5 years, with construction works commencing in Q2 of 2026 with phased completions and practical completion anticipated in 2031.

Financial Viability Assessment

- 9.39** **London Plan Policy H5 (Threshold approach to applications)** states that in order to follow the Fast Track Route of the threshold approach, applications must meet all listed criteria which include meeting or exceeding the relevant threshold level of affordable housing on site without public subsidy. Instead, the Proposed Development has followed the Viability Tested Route outlined in London Plan Policy H5 and the Mayor's Affordable Housing and Viability SPG to demonstrate that the maximum reasonable amount of affordable housing is provided.

Applicant's Financial Viability Assessment

- 9.40** The application was submitted with a Financial Viability Assessment (FVA). Two scenarios have been modelled by comparing the Residual Land Value of the Proposed Development against the Benchmark Land Value of the existing site:
- Scenario 1: self-delivery by the Council (the project is being delivered under this scenario).
 - Scenario 2: developer-led delivery
- 9.41** The differences modelled here are focused on profit requirement, commercial income and funding costs. The aim for Scenario 1 is break even and Scenario 2 requires a developer's profit (20% on private residential GDV, 6% on affordable housing GDV and 15% on Commercial).

- 9.42** The applicant's appraisals conclude that the Council delivery scenario is the most viable displaying a deficit of - £5,111,492 compared to a deficit of - £66,017,921 outlined in the developer-led appraisal. On this basis the scheme is technically unviable, but it is noted that the Applicant is committed to providing 50% affordable housing which is considered in excess of the maximum reasonable amount based on the appraisals.

Assessment

- 9.43** The FVA submitted has been reviewed by independent consultants Aspinall Verdi (AV). The purpose of this independent review is to determine, whether the submitted FVA represents a reasonable assessment of site viability and whether the proposed scheme is sufficiently viable to support LBHF's policy requirements. The review concluded a marginal improvement on viability (c.£7million) but the assessment found the scheme to be unviable on a policy compliant basis with a deficit of -£59,320,800 if delivered under Scenario 2.
- 9.44** The RICS Practice Statement requires that all FVAs and subsequent reviews must provide a sensitivity analysis of the results and an accompanying explanation and interpretation in respective calculations on viability, having regard to risks and an appropriate return(s). AV's sensitivity analyses have demonstrated how the viability can change subject to adjustments to appraisal inputs – notably the sales values and construction costs. With increases in sales values of 5%, a Council-led scheme becomes viable, producing a surplus of c.£1,000,000. As such, if there are favourable shifts to the market over the development period, there may be scope for the scheme to be viable.

Deliverability

- 9.45** The Council considers that by applying its own internal performance metrics, which are based on a long-term cashflow model, this scheme is viable and deliverable. Furthermore, the Council will access central and local government grant funding in order to make the scheme viable. This approach is common in local authority and housing association development projects and is used across the country.
- 9.46** This long-term cashflow model is used consistently for all schemes in the Council's development programme and adopts specific assumptions which are different to the parameters of a commercial appraisal that are used by private/market developers.
- 9.47** The main differences are as follows:
- No/minimal land value allowance as the Council owns the site and subsequently, there are limited acquisition costs (in this instance the purchase of the former NHS health centre in 2019),
 - There is no allowance for profit as the Council is the developer. The Council is not applying the usual profit margin of circa 20% on cost which would typically be included by a commercial developer and is tested as part of viability assessment required for planning,

- Long term rental income is included which supports repayment of the costs of construction. The scheme is funded through a combination of Housing Revenue Account and Housing revenue account borrowing, Right to Buy (RTB) receipts, GLA grant, section 106 funds and sales receipts from shared ownership and private leasehold sales.

9.48 In summary, officers consider that although the proposed 50% by habitable room affordable housing represents in excess of the maximum reasonable level of affordable housing the scheme can viably support, the applicant is committed to delivering the scheme as proposed and recognise that there are longer term objectives. The project is being delivered under the council-led Scenario 1.

9.49 The proposals would secure an uplift in housing provision, including affordable homes, representing a substantial benefit to the Council where, like most of London, there is a considerable need for new homes particularly affordable homes. The Proposed Development would accord with Policies HO1, HO3 and HO4 of the Local Plan 2018, as well as the suite of housing policies in the London Plan 2021.

10.0 STANDARD OF ACCOMMODATION

10.1 Housing quality is a key consideration in the assessment of applications for new developments. **London Plan Policy D6 (Housing quality and standards)** requires all new dwellings to have 'high quality design and adequately sized rooms' in line with space standards. This is reinforced in **Local Plan Policy HO4 (Housing Quality and Density)**. All the homes would comply and, in some cases, exceed the relevant space standards set in Policy D6 of the London Plan, which are consistent with the Nationally Described Space Standard.

10.2 **The Mayor's Supplementary Planning Guidance** on 'Housing' makes clear that a key priority is to 'improve standards for the quality and design of housing, making sure that homes meet the needs of a changing population throughout their lives and are built to the highest environmental standards'.

10.3 **Local Plan Policy DC2 (Design of New Build) and Policy DC3 (Tall Buildings)** state that all new builds and tall buildings must be designed to respect good neighbourliness and the principles of residential amenity. Local Plan Policy DC2, at part E states that all proposals must be designed to respect good neighbourliness and the principles of residential amenity. Key Principles HS6 and HS7 (iii) of the Planning Guidance SPD are also applicable.

10.4 **Local Plan Policy HO11 (Detailed Residential Standards)** states several criteria which should be taken into account when ensuring that the design and quality of all new housing is of a high standard, meets the needs of future occupants and respects the principles of good neighbourliness.

- 10.5** In terms of privacy and outlook, Policies D6 and D9 of the London Plan and Policy HO11 of the Local Plan require the existing residential amenities to be protected, including levels of privacy and outlook. More detailed design guidance is included in the Council's Planning Guidance SPD. The residential layouts have also been assessed in terms of daylight and sunlight levels which are summarised below. Overall, officers are satisfied that the proposal would provide an acceptable standard of accommodation for its residents in accordance with Policies D6 of the London Plan 2021 and Policies DC2 and HO11 of the Local Plan 2018.

Security

- 10.6** **The NPPF 2023** (Paras. 96 and 102) seeks to ensure that planning decisions promote public safety and take into account wider security and defence requirements. They should anticipate and address all plausible malicious threats and natural hazards and create safe, inclusive and accessible places that have high levels of amenity and do not undermine quality of life, community cohesion and resilience to crime and disorder.
- 10.7** **London Plan Policy D11 (Safety, security and resilience to emergency)** states that development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.
- 10.8** **Local Plan Policy DC1 (Built Environment)** seeks to ensure that new developments, new publicly accessible open spaces and new community and leisure facilities are inclusive and accessible, contribute to improving quality of life and reducing the incidence of crime and anti-social behaviour (paragraphs 2.57, 10.5 and 12.3).
- 10.9** Secured by Design principles have been applied throughout the proposals. Appropriate lighting, railings and gates are proposed to ensure the security and privacy of the school, as well as private and communal residential spaces. All entrance doors as well as ground and first floor windows will be PAS24 certified and refuse, and cycle stores will be LPS rated. The proposals have been designed such that ground floor entrances achieve a good level of natural surveillance, and CCTV will be installed on all main entry and exit points.
- 10.10** Residential cores will also be well lit and prominently positioned with recessed entrances only used in specific locations. It is considered that collectively these design measures have been carefully considered to reduce the likelihood and fear of crime on the Site and, accordingly, the Proposed Development should be considered acceptable in this respect.
- 10.11** The proposals are considered to be well designed and in accordance with the NPPF, Local Plan, and Policy DC1 of the Local Plan which requires development to reduce the opportunities for criminal behaviour.

Internal Size Layout

- 10.12** All the of the units have been designed to meet or exceed the National Technical Standards and London Plan Policy D6 space standards in terms of overall unit sizes and the internal space standards of individual rooms and storage space.

Aspect

- 10.13** **London Plan policy D6** requires development proposals to maximise the provision of dual aspect dwellings. It goes on to state that single aspect dwellings should only be provided where it is considered a more appropriate design solution to meet the requirements of Policy D3 (Design-led Approach), and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- 10.14** A total of 77% homes are dual aspect as a minimum, and the homes will be built to the latest energy efficiency standards to keep consumption and costs as low as possible, including the use of mechanical ventilation and heat recovery systems (MVHR).
- 10.15** The application is also accompanied by a Housing Quality Mark (HQM) One Pre-assessment report, which confirms that the residential element of the Proposed Development is anticipated to achieve a 4 Star (Very Good) HQM rating, which could potentially be raised to 4.5 Stars through the implementation of some further enhancements. This demonstrates that the new homes that will be delivered by the scheme will be of a very high quality.

Amenity Space

- 10.16** **The London Plan policy D6** states that a minimum of 5sqm of private outdoor space should be provided for each 1- 2 person dwelling, plus an additional 1sqm for each additional occupant.
- 10.17** **Key principle HS1 (Amenity Space)** states the Council will expect to see a more generous provision of outdoor amenity space than the minimum provision standards in the London Plan Housing SPG and the Play and Informal Recreation SPG. Key Principle HS1 states that:
- Every new family (3 or more bedrooms) dwelling should have access to amenity or garden space of no less than 36 sqm.
 - Family dwellings with accommodation at garden level should have at least one area of private open space with direct access to it from the dwelling.
 - For family dwellings on upper floors this space may be provided either as a balcony or terrace and/or communally within the building's curtilage.
- 10.18** Each new home is provided with private amenity space, in accordance with the requirements of the LPG and London Plan, in the form of a terrace for ground floor units or a balcony for upper floor units.

- 10.19** Officers consider that the proposals represent an appropriate balance between communal and private open space and an appropriate level of space provision in accordance with Key Principle HS1.

Accessible Homes

- 10.20** Both **London Plan Policy D7 (Accessible housing)** and **Local Plan Policy HO6 (Accessible housing)** require residential development to ensure that at least 10% of all units meet Building Regulation requirement M4(3) 'wheelchair user dwellings' with the remaining 90% to be designed to M4(2) 'accessible and adaptable dwellings'.

- 10.21** In total, 11% of the 253 proposed new homes have been designed to meet Building Regulations Part M4(3) (wheelchair accessible homes), and the remaining 89% of homes have been designed to meet Part M4(2) (accessible and adaptable homes).

- 10.22** Specifically, 27 homes (11%) will be provided as M4(3) wheelchair accessible homes, as follows:

- 6 x 1b2p market tenure (located in Blocks D, E and F at ground floor level)
- 9 x 2b4p social rent (located in Blocks D and G from ground to fourth floor level)
- 12 x 3b5p social rent (located in Blocks D and G from ground to fourth floor level)

- 10.23** The Proposed Development accords with London Plan Policies S4, D6 and D7, and H&FLP Policies HO6 and HO11. It also accords with Standards 4, 11, 26 and 27 of the Mayor's Housing SPG and PGSPD Key Principles HS2, HS8, DA1, DA2 and DA3.

Privacy

- 10.24** The design of the buildings aims to minimize the potential for overlooking and decrease the sense of enclosure while staying true to the historic street pattern and character of the conservation area. The re-introduction of residential buildings will inevitably change the existing views across this underutilized plot, resulting in massing appropriate to the surrounding area and reflecting the existing levels of privacy enjoyed by residents in this highly urbanized area.

- 10.25** The balconies facing onto Bridget Joyce Square include metal balustrades with integral building signage and closely spaced balusters for privacy at first floor level, and on the upper floors are constructed from metal.

- 10.26** Overall officers are satisfied that the proposal would provide acceptable amenity and environmental standards for existing and future residents. The proposals are considered to be well designed and in accordance with the NPPF, Local Plan, and Policy DC1 of the Local Plan which requires development to reduce the opportunities for criminal behaviour.

Daylight / Sunlight / Overshadowing within the Development

10.27 Paragraph 130c of the NPPF states that Local Planning Authorities should refuse applications which they consider fail to make efficient use of land for housing, and in this context, authorities should take a flexible approach in applying policies of guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site, so long as the resulting scheme would provide acceptable living standards. This signals a policy shift away from rigid application of such guidance, which may unduly preclude new housing development.

10.28 A Daylight and Sunlight Impact Assessment has been submitted in support of this application in relation to the guidelines set out in the 2022 Building Research Establishment (BRE) Report 'Site layout planning for daylight and sunlight - A guide to good practice'.

Daylight

10.29 Following officers' review of the Daylight and Sunlight assessment submitted with the application for the Proposed Development, officers have considered the methodology and results in line with the standards set out in the UK National Annex of BS EN 17037.

10.30 The assessment concludes that 80% of the 701 habitable rooms tested meet or exceed these recommended targets. Notably, for 38 living/kitchen/diner (LKD) rooms that fall short of the 200-lux target for spaces with kitchens, they still meet or exceed the 150-lux target for living rooms. This is in accordance with the recent edition of the BRE guidelines (Appendix C, paragraph 17), which allows for local authorities to use discretion in applying alternative targets for combined spaces, provided kitchens are not considered as habitable spaces.

10.31 Taking this into account, it is concluded that the majority (86%) of all habitable rooms proposed offer very good daylight levels for future occupants. This is particularly notable given the constraints of urban development.

10.32 In terms of the remaining rooms that do not meet the recommendations, the distribution of these rooms is as follows:

- a. **84 LKDs** fall short of the 200-lux target: 41 achieve the minimum 100 lux MDI (acceptable for urban settings). 43 achieve between 43 and 99 lux MDI, due to obstructions like balconies and neighbouring buildings (typical in large-scale urban developments).
- b. **One living room** achieves 101 lux, slightly below the 150-lux target but above the 100-lux minimum for bedrooms.
- c. **Four kitchens** fall short of the 200-lux target: One achieves 192 lux (minor shortfall). Three range from 95 to 141 lux MDI.
- d. **11 bedrooms** fall short of the 100-lux target for bedrooms: 6 achieve at least 80 lux MDI (minor shortfall). 5 are in areas with limited daylight due to facade constraints.

10.33 Overall, the shortfalls identified are typical of urban developments and represent a very small proportion (approximately 2%) of the total accommodation proposed. Furthermore, nearly all units (99%) have at least one room that meets or exceeds the recommended daylight levels. In most cases, the levels achieved are close to the minimum required for habitable rooms.

10.34 Given the high proportion of rooms that meet or exceed the BRE 209 2022 daylight recommendations, and the nature of the shortfalls being consistent with typical urban design constraints, officers are satisfied that the Proposed Development performs well overall in terms of daylight provision. The scheme can therefore be considered to meet the necessary standards for daylighting.

Sunlight

10.35 The Daylight and Sunlight assessment submitted considers that the Proposed Development meets the key requirements for sunlight access, with particular focus on ensuring that living rooms receive adequate sunlight. According to BRE guidelines, living rooms are the primary focus for sunlight provision, and this scheme achieves good results in this regard. Of the 253 units tested, 77% would receive at least 1.5 hours of sunlight on March 21st in at least one habitable room, which demonstrates compliance with the guidelines.

10.36 The reduction in sunlight in some units is attributed to the design of amenity spaces, such as balconies, which block sunlight to the windows below. However, this is considered an acceptable trade-off, as these balconies provide outdoor space with access to sunlight, particularly in summer months when the sun is higher.

10.37 Overall, officers consider that the development maximizes sunlight availability, ensuring that future residents will benefit from high levels of natural light throughout the year.

Overshadowing

10.38 The overshadowing assessment for the Proposed Development indicates that the communal amenity spaces, both at ground level and on the roof, meet and often exceed the BRE guidelines for sunlight availability. BRE recommends that at least 50% of open amenity areas receive two or more hours of sunlight on the equinox, and this scheme achieves an average of 71% sunlight exposure on March 21st.

10.39 Most of the tested areas surpass the minimum requirement, with only four areas falling slightly short. Three of these areas meet the BRE target shortly after the equinox, indicating minimal impact. While the nursery staff's accessible open space at roof level experiences reduced sunlight in March, there are alternative sunlit spaces available, including a well-lit teaching roof area.

- 10.40** The sun exposure analysis for March and June shows that, overall, the open spaces will receive ample sunlight, particularly during summer months, when most areas will enjoy four or more hours of sunlight. Therefore, the development provides excellent sunlight for communal amenity spaces throughout the year, meeting the BRE criteria.
- 10.41** In the light of the above, the Proposed Development accords with NPPF paragraph 129c and London Plan Policy D6, Local plan HO4, HO11, DC1 and 2 and SPD HS8.
- 10.42** Officers have considered the internal effects. The policy framework clearly supports the flexible application of daylight, sunlight and overshadowing guidance in order to make efficient use of land, and not to inhibit density. These policy documents resist the rigid application of guidelines and signal a clear recognition that there may be circumstances in which the benefits of not meeting them are justifiable, so long as acceptable levels of amenity are still enjoyed. The Proposed Development would provide acceptable internal levels of amenity.

11.0 OPEN SPACE

- 11.1 NPPF Para. 104** states that existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus requirements or the loss resulting from the Proposed Development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
- 11.2 London Plan Policy G4**, Part B, emphasizes that development should not result in the loss of protected open spaces. It encourages the creation of publicly accessible open spaces, especially in areas with a deficiency.
- 11.3 Local Plan Policy OS1** outlines the Council's commitment to protecting, enhancing, and increasing parks, open spaces, and biodiversity by:
- a) establishing a hierarchy of open spaces, including metropolitan open land, and areas of nature conservation importance.
 - b) requiring a mix of public and private open spaces in key regeneration areas like White City, Earls Court, West Kensington, and South Fulham.
 - c) improving existing parks, open spaces, and recreational facilities.

11.4 Local Plan Policy OS2 focuses on reducing open space deficiencies and enhancing the quality and accessibility of existing spaces. It specifies:

- a) opposing development on public open space of strategic or borough-wide importance unless it does not harm its character, recreational function, or contribution to biodiversity.
- b) opposing development on open spaces of local importance unless the development provides a qualitative gain for the community and replaces the space with an equivalent or better one.
- c) requiring accessible new open spaces in major developments, especially in regeneration areas.
- d) seeking improvements to existing spaces, such as Linford Christie Stadium, when development impacts them.

11.5 The Site includes the White City Community Garden, which is designated Open Space (Small Local Parks and Open Spaces, reference: OS30) and extends to 5,778 sqm, covering approximately 26% of the overall Site area. However, only 3,582 sqm of this space is publicly accessible, as the former White City Adventure Playground, which closed to the public in 2020, covers 2,196 sqm or 38% of the OS30 area.

11.6 Overall, the existing Site contains 14,552 sqm of open space (including OS30), of which 6,127 sqm (42.1%) is publicly accessible open space; 2,320 sqm (15.9%) is restricted access open space, and 6,105 sqm (42.0%) is private open space.

11.7 The OS30 designated open space is centrally located within the Site, and its boundary is determined by the current Site layout. To align with the Council's Building Homes and Communities Strategy and meet the objectives of the London Plan and Local Plan, including optimizing development within the White City Opportunity Area/Regeneration Area while maintaining surrounding amenity and responding to the local townscape, new buildings are proposed within the OS30 boundary, with the taller elements located at the centre of the Site.

11.8 The development will reduce the open space in OS30 by 2,352 sqm (40.7%), which is contrary to Local Plan Policy OS2, as it impacts the open character of the space. However, this policy conflict is considered to be outweighed by the mitigating factors and public benefits the development will bring.

11.9 The proposal includes 12,096 sqm of open space, with 9,006 sqm (74.5%) designated as new public realm. This represents a significant increase of 2,879 sqm (47%) in public realm compared to the existing site, benefiting the wider community. While there is a reduction in OS30 open space, the overall increase in public realm is viewed as a mitigation of the conflict with Policy OS2.

- 11.10** Dealing with **NPPF Para. 104**, because of the increase in public realm compared to the existing site, it is considered that the requirements of that paragraph of national guidance are met, because the increase in public realm compared to the existing site means that “equivalent or better provision” will be made by the Proposed Development. It appears from *R (Brommell) v Reading Borough Council* [2018] EWHC 3529 at para 28 that to satisfy Para. 104 it is not required that replacement provision be equivalent or better in terms of both quality and quantity, but simply that both quality and quantity are relevant parameters in judging whether provision is equivalent or better. The provision will be equivalent or better because of the increased public realm, even though the overall quantity of open space will be reduced. Even if this is not accepted, it is considered that the Proposed Development is still acceptable, because as set out in next paragraph it must be assessed in the context of its overall benefits.
- 11.11** The development should be assessed within the context of the entire Development Plan, not just individual policies. The proposals align with other key planning objectives and will provide substantial public benefits, including 253 new homes (50% affordable housing), a new nursery, and a community hub. While there is a conflict with Local Plan Policy OS2, the Proposed Development is considered to comply with the Development Plan overall due to the mitigation measures and significant public benefits.

12.0 LANDSCAPING, BIODIVERSITY, TREES, URBAN GREENING FACTOR AND PLAY SPACE

Policy Context

- 12.1 NPPF Section 8** emphasises the importance of healthy and safe communities (including play spaces), **Section 12** emphasises the importance of achieving well-designed places and **Section 15** emphasises the importance of conserving and enhancing the natural and local environment.
- 12.2 London Plan Policy D6 (Housing quality and standards)** requires developments to consider the provision of public, communal and open spaces. **Policy G5 (Urban Greening)** states that major development should contribute to the greening of London, incorporating measures such as high-quality landscaping, green roads, green walls and nature-based sustainable drainage. **Policy S4 (Play and informal recreation)** further requires the provision of good quality, well-designed and stimulating play and informal recreation provision for children, including trees and greenery where possible. **NPPF Para. 135** states that planning decisions should ensure that developments will function well and add to the overall quality of the area and are visually attractive as a result of appropriate and effective landscaping as well as good architecture and layout.

12.3 Local Plan Policy OS1 (Parks and Open Spaces) states that the Council will protect, enhance, and increase the provision of parks, open space and biodiversity in the borough. **Policy OS3 (Play space for Children and Young People)** states that proposals should not result in the loss of existing play space or an increased deficiency in the availability of such play space. It requires well-designed provision of accessible, inclusive, safe and secure communal play space in new residential developments to cater to the needs of all children. The scale and nature of its provision should be proportionate to the scale and nature of the Proposed Development. **Policy OS5 (Greening the Borough)** seeks to enhance biodiversity and green infrastructure in the borough by (inter alia) maximising the provision of gardens, garden space and soft landscaping, and seeking green and brown roofs and planting as part of new development; seeking retention of existing trees and provision of new trees on development sites; and adding to the greening of streets and the public realm.

Landscaping

12.4 The landscaping strategy seeks to complement the architectural treatment of the new buildings to create defined character areas throughout the site:

- a) **Big Tree Streets and Public Play-** vertical timber fins and expressed vertical piers to balconies pairs with the mature trees to provide vertical articulation and a strong civic façade.
- b) **Mid tree streets-** buildings make stronger reference to the existing linear blocks, incorporating expressed lintels, corbelled brick piers and horizontal elements, including metal balconies broken up by paired bays.
- c) **Play-on-the-Way residential courtyards-** an articulation of mass and variation in brickwork provides a clear distinction to residential courtyards, which incorporate their own meadow planting and seating.
- d) **Forest Play and Learning-** open facades encourage blending of interior/exterior spaces and maximise appreciation of the landscape.

12.5 In addition to the above character areas, a new community garden providing growing space and a greenhouse is provided. A clear central node is created by the orientation of the new buildings and the widened Bridget Joyce Square being fully pedestrianised from east-west, with significant native planting, rain gardens and public art enhancing the new central community space.

12.6 Landscape proposals have been informed by Sustainable Urban Drainage (SuDS) principles, including permeable surfaces and vegetated raingardens and planting, green and blue roofs and semi-mature and mature trees being integral to the proposal. The existing Site of Importance for Nature Conservation (SINC) located in the north-eastern area of the site will be retained and incorporated into the new nursery garden.

- 12.7** It is noted that there is some loss of open space in the proposals, however the masterplan increases the amount of higher quality and publicly accessible open space and play space provision takes a flexible approach, incorporating a forest school, nature garden and an innovative variety of play options with active surveillance- including an SEN playground and play on the way amenities.

Trees

- 12.8** **The NPPF** (Para. 136) stresses the importance of trees and makes clear that planning decisions should ensure that new streets are tree-lined.
- 12.9** **London Plan Policy G7** makes clear that development should seek to retain and protect trees of value and replace these where lost. London Plan Policy G5 sets out the concept and defines Urban Greening Factor (UGF) as a tool used to evaluate and quantify the quality of urban greening provided by a development and aims to accelerate greening of the built environment, ensuring a greener London as it grows. It calls on boroughs to develop their own UGF targets, tailored to local circumstances, but recommends an interim target score of 0.40 for Proposed Development that is predominantly residential.
- 12.10** **Local Plan Policy OS5**, which sets out the Council's aim to enhance biodiversity and green infrastructure, seeks the retention of existing trees and the provision of new trees on development sites, and for development to add to the greening of streets and the public realm.
- 12.11** A Tree Survey and Arboriculture Impact Assessment (AIA) has been provided by the applicant.

Assessment

- 12.12** The AIA includes the results of an arboricultural survey that was undertaken at the Site in April 2024. The survey identified a total 113 individual trees, 17 groups of trees and 5 hedges located within and immediately adjacent to the Site.
- 12.13** Of the trees surveyed, 2 individual trees were recorded as Category 'A' status (high quality), 9 individual trees and 3 groups were recorded as Category 'B' status (moderate quality), 88 individual trees, 13 groups and 5 hedges were recorded as Category 'C' status (low quality), and 14 individual trees and 1 group were attributed Category 'U' status (recommended for removal on the grounds of good arboricultural practice).
- 12.14** As set out in the AIA, the proposals seek to retain as many viable existing trees as possible, and where existing trees are required to be removed, they are replaced at a ratio of 2:1, with two new trees to be provided for each existing tree that is removed.

- 12.15** Specifically, the proposals include the retention of 28 individual trees and 5 groups of trees, and the removal of 85 individual trees and 12 groups of trees and 5 hedges. Of the trees, groups and hedges to be removed, 5 are Category 'B', 80 are Category 'C', and 15 are Category 'U'. All of the existing Category 'A' trees are to be retained, and all of the existing Category 'U' are to be removed on the grounds of good arboricultural practice.
- 12.16** It is proposed that the loss of existing trees will be fully mitigated through a comprehensive scheme of replacement tree planting, with a total of 215 new trees to be replanted across the site, which as set out above equates to a re-provision ratio of 2:1. The proposed new tree planting will comprise a mix of large, medium and small stem trees, including a mix of single and multi-stem trees.
- 12.17** The AIA states that the Proposed Development has maximised the retention of existing trees, and in particular existing high-quality trees, and that the loss of existing Category B and C trees is fully offset through the provision of a significant amount of new tree planting.
- 12.18** It is considered that the Proposed Development is broadly compliant with Local Plan Policy OS5, having regard to the proposed tree planting. Furthermore, the overall benefits from the Proposed Development of providing a new nursery, community centre and much needed housing outweigh any conflict with Policy OS5 arising from the removal of existing trees.

Biodiversity

- 12.19** **NPPF** Para. 187 provides that planning decisions should contribute to and enhance the natural and local environment. Para. 183 sets out the principles which authorities should apply when determining planning applications.
- 12.20** **London Plan Policy G6**, Part A, states that Sites of Importance for Nature Conservation (SINCs) should be protected. Part C states where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts: (1) avoid damaging the significant ecological features of the site; (2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site, and; (3) deliver off-site compensation of better biodiversity value.
- 12.21** **Local Plan Policy OS4** states that designated nature conservation areas will be protected from development likely to cause demonstrable harm to their ecological value unless: (a) the Proposed Development would release a site for built development needed to realise a qualitative gain for the local community in pursuance of other physical, social and economic regeneration objectives of the Local Plan, and measures are included for the protection and enhancement of any substantive nature conservation

interest that the site may have so that there is no net loss of native species and no net loss of habitat; or (b) provision is made for replacement nature conservation interest of equal or greater value elsewhere in the locality.

Sites of Importance for Nature Conservation (SINCs)

- 12.22** An Ecological Impact Assessment (EclA) has been submitted in support of the application which confirms that there are no statutory designated sites within the Site boundary but notes that the application site includes the White City Community Gardens SINC, which is designated as a Nature Conservation Area of Local Importance in the Local Plan (ref: L1).
- 12.23** The SINC spans approximately 1,250 sqm and is located at the north-east corner of the Site. The EclA includes the results of a survey of the White City Community Gardens SINC, which was undertaken on 7th February 2022, which found the area to comprise amenity grassland with introduced shrubs, scattered trees and hardstanding, whilst also containing outdoor gym equipment. Plant species observed during the site survey included species commonly associated with urban areas. The survey noted that the SINC contains amenity grassland, planted shrubbery, scattered trees and hardstanding and provides some opportunities for invertebrates, nesting birds and foraging bats. The survey found that the habitats within the SINC are not considered ecologically notable or important on a local level, with the value of the SINC being derived from the availability of accessible greenspace within the urban environment, rather than the biodiversity interest of the habitats present.
- 12.24** A survey of the wider Site, conducted in August and September 2023, found low bat activity and no bats emerging. It also determined that the Site's existing habitats have low value for nesting birds, invertebrates, and hedgehogs. The report assesses the potential ecological impacts of the Proposed Development and recommends several mitigation measures.
- 12.25** The Wormwood Scrubs Local Nature Reserve (LNR), located 745m away, is outside the 500-meter buffer zone for construction disturbance and is not expected to be impacted by the development. Additionally, while three Sites of Importance for Nature Conservation (SINCs) within 1km (White City Community Garden, Wormholt Park, and Hammersmith Park) could be affected by construction, the report concludes that the already heavily urbanized environment and separation of the Site from these SINCs by residential areas and busy roads will mean that impacts will be avoided.
- 12.26** Mitigation measures proposed include bat bricks and boxes, bird boxes, new tree planting, hedgehog-friendly fencing, and landscaping. Demolition and vegetation removal should occur outside the bird nesting season, and lighting will be designed to minimize impact on nocturnal animals. The report also mentions a potential fox den in the community garden and recommends monitoring and management actions if cubs are found.

- 12.27** For the White City Community Garden SINC, a separate Biodiversity Enhancement Strategy has been prepared, which includes ecological enhancements like tree-mounted bird and bat boxes, invertebrate hotels, new tree planting, and removal of invasive species. The development will involve 16% of the SINC area, but the strategy aims to mitigate these impacts.

Biodiversity Net Gain

- 12.28** A Biodiversity Enhancement Strategy and Biodiversity Net Gain Report have been submitted in support of the application.
- 12.29** Changes to the Environment Act introduced a mandatory 10% Biodiversity Net Gain (BNG) target for planning applications submitted from Monday 12 February 2024.
- 12.30** The Biodiversity Net Gain Assessment shows the development will result in a 33.54% reduction in habitat units. There are net losses of medium distinctiveness area habitats in two broad habitat groups, and too few gains at higher distinctiveness categories to offset these losses. The broad habitat groups concerned are individual trees and grassland. The development will result in a 52.75% increase in hedgerow units. To achieve no net loss and a 10% biodiversity net gain, onsite enhancements and/or offsite habitat creation and/or the purchase of biodiversity credits (as a last resort) are required to be secured through conditions and a Memorandum of Understanding (as referred to in section 28 of this Report). The final biodiversity measures will be implemented through these conditions and the Memorandum of Understanding.
- 12.31** In the light of the above, the Proposed Development will be sustainable development and accord with NPPF paragraphs 187 and 193, H&FLP Policies OS4 and OS5, and PGSPD Key Principles BD1 and BD7.

Ecology

- 12.32** **London Plan Policy G5 (Urban Greening)** states that development proposals should integrate green infrastructure from the beginning of the design process, which could include tree planting; green roofs and walls; and soft landscaping. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. Higher standards of greening are expected of predominantly residential developments (target score 0.4). **Policy G7 (Trees and Woodlands)** seeks the retention of trees wherever possible, and states that any loss should be replaced, and additional trees should be planted where possible.
- 12.33** **Local Plan Policy OS5 (Greening the Borough)** seeks to enhance biodiversity and green infrastructure in the borough.

- 12.34** The Proposed Development incorporates a range of ecological enhancements, including bird boxes, bat boxes, invertebrate hotels log piles, hedgehog boxes, new planting including new trees, and the removal of invasive, non-native species. The external lighting scheme has also been designed to minimise the impact on nocturnal animals, including the use of UV free LEDs emitting warm white light with a peak wavelength of >550nm, and any existing vegetation to be removed will be done outside of nesting season.
- 12.35** The proposals will retain all existing Category A (high quality) trees and seek to retain as many Category B (moderate quality) and Category C (low quality) trees as possible. Where existing trees are required to be removed to facilitate the development or due to their very poor condition, these trees will be replaced at a ratio of 2:1, with a total of 215 new trees to be planted across the site.
- 12.36** The Proposed Development is in accordance with Policy G5 of the London Plan 2021 and Policy OS5 of the Local Plan 2018.

Urban Greening Factor ('UGF')

- 12.37** An UGF assessment has been submitted based on **Policy G5 of the London Plan**. The policy recommends target scores of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development. For the proposed design, including the existing trees, the score is 0.4 and therefore in line with the recommended score of 0.4.
- 12.38** An indicative outline calculation of the existing UGF shows that the before score sits a little lower at 0.31 compared to the proposed 0.4 UGF.

Play Space

- 12.39** **The London Plan Policy S4** and the **Mayor's Play and Informal Recreation SPG (2012)** require developments to provide 10sqm of play space per child generated by the scheme.
- 12.40** The Site currently has 4,528 sqm of play space, including a playground, MUGA, and the closed White City Adventure Playground, which accounted for 49% of the space. The estate also has an additional 1,110 sqm of play areas. With 1,462 children in the area, this provides 3.85 sqm of play space per child, or 2.3 sqm excluding the Adventure Playground.

- 12.41** The Proposed Development will provide 4,826 sqm of play space, a 107% increase from the current site.

Play Space	Age Groups	Area
Adventure playground	5-17 years old	1,047 sqm
Nature garden (shared with the nursery)	5-17 years old	418 sqm
Bridget Joyce Square	5-17 years old	1,600 sqm
Residential courtyards	0-11 years old	1,172 sqm
Community garden	12-17 years old	201 sqm
Southern boundary	5-17 years old	200 sqm
Rooftop kick-about	5-17 years old	188 sqm
TOTAL	-	4,826 sqm

Table 6: Proposed Play Space Provision



Existing and Proposed Play Space within the White City Estate

- 12.42** The Proposed Development will increase the total play space in the estate, providing 3.47 sqm per child, or 3.74 sqm when including shared educational space. This is close to the current provision of 3.85 sqm per child and significantly higher than the 2.3 sqm per child when excluding the closed White City Adventure Playground.
- 12.43** The play strategy includes a variety of play elements, such as natural, adventurous, and inclusive features for children of all ages and abilities. Additionally, three of the four existing play spaces in the wider estate will be enhanced with new equipment to improve quality during construction.

13.0 DESIGN, HERITAGE, AND TOWNSCAPE

Policy Context

- 13.1 The NPPF** emphasizes the importance of high-quality design and a good standard of living for current and future occupants of land and buildings. It also stresses the need to conserve heritage assets in a way that highlights their significance for future generations. The NPPF views good design as essential for sustainable development, enhancing places for people. Section 12 outlines key design principles, stating that developments should: function well over time, be visually attractive, respect local character and history, create a strong sense of place, maximize site potential, and promote safe, inclusive, and accessible spaces that support well-being and community cohesion.
- 13.2 Chapter 3 (Design) of the London Plan 2021** focuses on achieving good design through policies such as D3, D4, D6, and D8. Policy D3 emphasizes maximizing land use by following a design-led approach that considers site form, layout, experience, and quality. Policy D4 encourages visual, environmental, and movement assessments, including the use of digital models and design reviews, to inform decisions and engage the public. Policy D6 promotes quality standards for new housing developments, while Policy D8 outlines criteria to ensure well-designed, safe, accessible, and connected public spaces.
- 13.3 Local Plan Policy HC1** section C states that development proposals affecting heritage assets or 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 be actively managed.
- 13.4 Local Plan Strategic Policy WCRA** (White City Regeneration Area) within the Local Plan (2018) notes that the opportunity exists in the WCRA for substantial mixed-use development which will help to regenerate the wider area, by providing new housing, including affordable housing, a greater range of job opportunities and community and leisure facilities. This policy also requires development proposals to:
- a) improve connections to existing communities, including between White City West, the town centre and east to RBKC to improve both north-south and east-west connectivity within the WCRA and connections to the wider area.
 - b) ensure that development extends and integrates with the urban grain and pattern of development in the WCRA and its surrounding area.

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

13.6 Local Plan Policy DC8 focuses on protecting and enhancing the borough's heritage assets, including listed buildings and conservation areas. Key principles include prioritizing the conservation of heritage assets, ensuring proposals respect their significance and setting, and requiring assessments of impact. Alterations are only permitted if they conserve or enhance the asset's value. Proposals causing substantial harm will be refused unless justified, and changes of use must maintain the asset's significance. The policy also emphasizes accessible design, climate change considerations, and expert advice on archaeological matters.

Site Context

13.7 Designed in the 1930s, the White City estate was built between the 1930s and 1960s on the site of the former White City exhibitions (starting with the Franco-British Exhibition in 1908). Comprising 2000 homes and community facilities including a housing office, family annexe, one o' clock club, an adventure playground building and the Randolph Beresford early years centre, the estate is also served by extensive open space and play spaces including an adventure playground, nature conservation area and the central public space, Bridget Joyce Square.

13.8 The proposal is for the demolition of the existing buildings occupying the central portion of the estate, and Bridget Joyce Square to allow for the construction of a mixed-use development comprising a new community facility, educational facility and 6 new blocks of residential accommodation, with associated parking and landscaping, (including a new Bridget Joyce Square). The masterplan seeks to respond to the existing site context as well as being informed by consultation with local residents to address issues with the current site configuration and buildings as well as provide new housing across the site and re-provide community and educational facilities.

13.9 Given the demolition of the existing community facilities on-site, the proposals also bring forward development of temporary buildings occupying the south-eastern portion of the site, to accommodate these functions.

Layout

- 13.10** The masterplan incorporates 6 new residential blocks ranging from 5-6 storeys on a roughly north-south alignment along with a central consolidated community hub fronting a new arrangement of public space, incorporating a replacement to Bridget Joyce Square. The Randolph Beresford Nursery is re-provided in an L-shaped building to the north-east of the site, with an adventure playground and open space facilities positioned between the nursery and the new community hub. The existing substation is moved and incorporated into the new community space.
- 13.11** Accommodating a community centre, housing office, one o'clock club and the Randolph Beresford Family centre, the new community hub and flank walls of Block B provide a strong civic frontage and meeting point on the route through the site running east-west across Australia Road.
- 13.12** The layout of the masterplan has been informed by resident co-production, seeking to address issues raised by residents and users of the community buildings during the consultation process, including better wheelchair accessibility and a desire to extend the nursery teaching space into the landscape. In line with the requirements of Strategic Policy WCRA of the local Plan, both north-south and east-west connectivity within the WCRA and connections to the wider area are improved by the proposal, including more direct pedestrian access to public transport facilities, including Shepherds Bush rail and bus stations and White City and Wood Lane Underground stations.
- 13.13** Ground floor layouts and balconies throughout the site have been orientated to maximise active surveillance and activation of the public realm. Layouts throughout the site have also been informed by a comprehensive Inclusive Design Strategy.

Scale and Massing

- 13.14** Buildings throughout the White City area (with some exceptions, including the Ed City development to the east of the site) are generally 3-5 storeys in height and the residential buildings within White City Central are 5 storeys, which has informed the scale and massing of the new development. Residential blocks C, D & G sit to the edge of the site fronting existing residential buildings and have a 4-storey massing with a set-back 5th floor. Blocks E and F sit further within the site and are 5 storeys with a set-back 6th floor. Block B sits at the heart of the site and is designed to be the tallest building at 6 storeys. This block is intended to act as a way-finding element within the scheme and form a central axis and pivot point where the community hub meets Block B and the widened Bridget Joyce Square. The new community hub is 2 storeys with an enclosed roof sports pitch and the nursery building is part 1, part 2 storeys.

Townscape impacts

- 13.15** Verified views are provided within the submission and these show the most significant impact of the new blocks on views to be AVR_L05 (between Denham House and Mackay House), AVR_L07 (Between Cornwallis House and Denham House on Australia Road) and AVR_L08 (immediately to the north of Mackay House, within the estate). From these verified views, it is noted that the new blocks sit comfortably within their context. Where the scale of buildings is taller than the immediate surrounding context, the architectural treatment and materials are complementary to the surrounding area.
- 13.16** Assessments of views from the Wood Lane, Old Oak and Wormholt and Ingersoll and Arminger Conservation Areas provided within these verified views confirm that there would be no impact or harm on to setting of the surrounding conservation areas, in compliance with Policy DC8 of the Hammersmith & Fulham Local Plan (2018). Furthermore, the development is not considered to result in any harmful townscape impacts.

Design and appearance

Residential blocks

- 13.17** The existing White City estate is defined by post-war linear housing blocks featuring modest architectural detailing. Residential blocks are predominantly detailed in reddish-brown brickwork featuring pitched roofs with expressed lintels and white stucco dressings. Expressed cores and prominent chimneystacks, alongside integrated projecting balconies and deck-access arrangements give the existing development its character. Blocks are typically arranged in U, L and rectangular formats.
- 13.18** The proposed new residential blocks reference the material palette and architectural form of the existing housing blocks and more widely, the 1930s architecture in the area which in turn references high density and richly detailed Edwardian mansions of West London.
- 13.19** Brick forms the principal building material for the residential blocks with a mixture of complementary brick tones combined with a blueish brick plinth serving to visually ground the buildings and provide coherence across the site. In common with the existing housing blocks, lintels will be expressed using a lighter complementary brick and this will extend to parapets. Articulated elements found on the existing buildings, including corbelled piers and contrasting balcony elements will also be incorporated. Cycle storage will be contained internally on the ground floor of residential blocks.

Community hub and nursery

- 13.20** The community hub and nursery building design seeks to complement the design of the existing estate and new build housing blocks. Both buildings are designed to feature simple, yet high-quality detailing, the nursery is detailed using brick façades with timber louvres and glazing to create a lightweight appearance which blends with the landscaping on the site. The community hub building also features brickwork detailing and integrates with

the landscape using timber fins and glazing and cross-laminated timber construction. Both buildings seek to bring appropriate levels of active frontages to the ground floor along Australia Way/Bridget Joyce Square and India Way.

Temporary community buildings

- 13.21** Temporary community facilities will be required during the redevelopment of the site- details of the proposed temporary modular units have been included with the proposal and are deemed acceptable from a design perspective.

Design Review and Inclusive Design Review Panels

- 13.22** Proposals were presented to both the Design Review and Inclusive Design Review Panels. Both panels gave support to the principles of the design concept for both the replacement school and residential elements of the scheme. A series of detailed observations were made by both panels, to assist in the refinement of the detailed design of the scheme. These recommendations, alongside officer feedback were taken forward through revisions to the proposals ahead of planning submission.

- 13.23** The development is considered to represent a high quality of design, which would complement the character of the surrounding area; and provide a scheme with its own contemporary character overall.

Design, Heritage, and Townscape Conclusion

- 13.24** The proposed masterplan presents a high-quality contextual response to the existing site providing residential and community facilities of a high-quality design and maximising opportunities to optimise the development capacity of the site, introduce improved public realm and landscaping, active frontages and circulation and connectivity through the estate and into the wider area, as required by Strategic Local Plan Policy WCRA.
- 13.25** The proposals would not result in any harmful impacts to surrounding heritage assets or their setting, or to local townscape and would serve to respect and complement the character of the White City estate. In compliance with Local Plan Policies DC1 and DC8, it is considered that for the reasons above, the proposal would create a high-quality development complementing the existing urban environment that respects and enhances its townscape context. The proposal is a high standard of design which respects the scale, mass, form and grain of surrounding development and the local design context and incorporates sustainability objectives and the principles of accessible and inclusive design, in compliance with the NPPF, London Plan (2021) Policies D3, D4, D5, D8 and HC1, Local Plan Policies, WCRA, DC, DC2 and DC8.

14.0 AMENITY IMPACTS

14.1 Policies DC1, DC2, CC11, CC13 and HO11 of the Local Plan 2018

require all proposals to be formulated to respect the principles of good neighbourliness. SPD Housing Key Principles 6, 7 and 8 seek to protect the existing amenities of neighbouring residential properties in terms of outlook, light, privacy and noise and disturbance.

14.2 SPD Key Principle HS6 notes that the proximity of a development can have an overbearing and dominating effect detrimental to the enjoyment by adjoining residential occupiers of their properties.

14.3 One of the key objections received relates to the impact of the Proposed Development on the amenity of the surrounding residential occupiers. Matters relating to daylight/sunlight plus loss of outlook and overlooking and privacy are covered in this section of the report.

Overlooking/Privacy

14.4 Local Plan Policy DC4 and HO11 seek to ensure that new development will respect the principles of good neighbourliness, in particular the amenities of the neighbouring properties and other properties most directly affected by the proposal.

14.5 The design of the buildings has considered minimising the potential for overlooking and decreasing the sense of enclosure whilst remaining true to the historic street pattern. The proposal is formed around the following principles:

- Prioritising bedrooms facing onto primary play spaces
- No balconies facing Randolph Beresford Nursery Forest School Outdoors Area
- Units articulated to sit mainly behind mature tree specimens to offer seasonal shading/ view protection

14.6 The proposed levels of window-to-window distances compare with or exceed the current levels within the estate. Overall, the impact on surrounding residential properties will be acceptable and in accordance with the NPPF, Local Plan, and Policy DC1/DC2 of the Local Plan.

Daylight, Sunlight, and Overshadowing

14.7 The British Research Establishment (BRE) guide on 'Site layout planning for daylight and sunlight', sets out good practice for assessing daylight and sunlight impacts for new development. In urban and city centre areas, BRE Guidelines advise that the guidance be applied flexibly. The applicant's Daylight and Sunlight report which has been carried out in line with BRE and considers the potential impacts of the Proposed Development on daylight, sunlight and overshadowing on existing neighbouring residential buildings. Officers have considered the applicant's report in terms of impact on habitable rooms.

Daylight and Sunlight

- 14.8 Paragraph 130c of the NPPF** states that Local Planning Authorities should refuse applications which they consider fail to make efficient use of land for housing, and in this context, authorities should take a flexible approach in applying policies of guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.
- 14.9 London Plan Policy D6 (Housing Quality and Standards)** supported by the Mayor's Housing SPG, seeks to ensure that high quality housing schemes are delivered, which includes providing sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing, and maximising the usability of outside amenity space.
- 14.10** There are no specific policies about daylight, sunlight or overshadowing in the Local Plan. **Policy HO11 of the Local Plan** includes requirements for residential developments to avoid detrimental impacts on the amenities of residents in the surrounding area. The policy refers to the protection of existing residential amenities including such issues such as loss of daylight, sunlight, privacy, and outlook. **Policy DC1 (Built Environment)** requires development to be well designed and respect of the principles of good neighbourliness. **Policy DC2 (Design of New Build)** requires development to be designed to respect residential amenity and to demonstrate good neighbourliness. This is expanded on within the **Planning Guidance SPD (2018)**. **Key Principles HS6 and HS7 of the SPD** seek to protect the existing amenities of neighbouring residential properties, in terms of outlook, light, and privacy.
- 14.11** A Daylight and Sunlight Impact Assessment prepared by GIA (who are leading specialists in this field) has been submitted in support of this application.
- 14.12** The daylight and sunlight assessment has been carried out with regard to the guidelines set out in the 2022 Building Research Establishment (BRE) Report 'Site layout planning for daylight and sunlight - A guide to good practice'. A 3D massing computer model for testing daylight, sunlight and overshadowing has been created from the submitted drawing information. The BRE guidelines are not mandatory and explicitly state that the numerical target values should be interpreted flexibly, particularly in urban locations. Appendix F of the BRE guidelines provides advice on setting alternative targets for access to daylight and sunlight. It states that to ensure that new development matches the height and proportions of existing buildings, the daylight and sunlight targets for those windows could be set to those for a "mirror image" building of the same height and size, an equal distance away on the other side of the boundary. This Mirror Massing approach has been used in this case.

- 14.13** For daylight adequacy to existing neighbouring residential properties, the Vertical Sky Component (VSC) and No Skyline (NSL) assessments have been carried out, and for sunlight adequacy the Annual Probable Sunlight Hours (APSH) study is carried out. The assessment carried out is based on the standard values/targets set out in the BRE guidelines.
- 14.14 The Vertical Sky Component (VSC)** test calculates the amount of skylight received at the centre of an existing window. The target value is at least 27% VSC or more. If this value cannot be achieved, the skylight to the existing window should not be reduced by more than 20% (0.8 times) of its the current value, as this may be deemed to have a noticeable impact on daylight levels.
- 14.15** VSC targets apply to unfettered plain facades. The presence of balconies and external walkways can reduce VSC values at windows neighbouring a site. Where balconies or overhangs are present, it is not uncommon for two sets of VSC figures, one with these obstructions in place, and one with their effect removed from the calculations to be presented.
- 14.16 The No Skyline (NSL) assessment** (also known as Daylight Distribution test) divides those areas of the working plane within an existing room which can receive direct skylight, from those which cannot. It provides an indication of how good the daylight distribution is within an existing room at working plane level. The BRE advises that an existing room may be affected if the area of the working plane in a room which can receive direct skylight is reduced by more than 20% (0.8 times) of its current value.
- 14.17 Appendix C of the 2022 BRE guidelines** details a methodology for assessing daylight within Proposed Developments which replaces the Average Daylight Factor (ADF) methodology that was previously used in the (2011) version. The new methodology is more complex and is a more accurate simulation of actual daylight levels but has targets that are generally more difficult to achieve in an urban context. The Interior Illuminance assessment in the current updated guidance is an alternative climate-based daylight test which uses target illuminance (lux) values.
- 14.18 Annual Probable Sunlight Hours (APSH)** is the measure of the level of sunlight reaching the window on the external face of a building. The target value is at least 25% of annual probable sunlight hours, including at least 5% in winter. There will be an adverse impact if an existing window receives less than 25% of annual probable sunlight hours and less than 0.8 times its former annual value, or less than 5% of annual probable sunlight hours in winter (between 21 September and 21 March), and less than 0.8 times its former value during that period, and also has a reduction in sunlight over the whole year greater than 4% of annual probable sunlight hours.

Daylight Assessment

14.19 The Daylight and Sunlight Impact Assessment assesses the effect of the Proposed Development on the daylighting and sun lighting conditions of the following nearby buildings:

- Malabar Court
- Cornwallis House
- Denham House
- Mackay House
- Champlain House
- Evans House
- St John XXIII Catholic Primary School
- St John XXIII Catholic Nursery School
- Our Lady of Fatima Catholic Church

14.20 The results of the assessment show that the properties Malabar Court and Our Lady of Fatima Catholic Church will fully meet the BRE guideline values for VSC and DD with the Proposed Development in place and are therefore not commented on further.

Cornwallis House

14.21 Cornwallis House is a 5-storey residential block located west of the proposed nursery and community centre. With the Proposed Development in place 68% of the windows comply with VSC guidelines, with minor reductions in daylight for 32 windows. Of these, 18 serve kitchens (non-habitable rooms) and 14 serve bedrooms, which have lesser daylight needs. The daylight that will be received is an improvement on the target value that would be derived from using a Mirror Massing approach, ensuring overall daylight levels are consistent with the wider estate. All rooms comply with NSL, and no APSH assessment is needed for sunlight as the windows do not face due south.

Denham House

14.22 Denham House, a 5-storey residential block, is located west of Block D. 55% of windows comply with VSC, with 46 windows experiencing varying reductions in daylight, primarily in kitchens and bedrooms. The daylight that will be received is only minimally below the target value that would be derived from using a Mirror Massing approach. With the Proposed Development in place 91% of rooms comply with NSL, and no APSH assessment is required due to the building's orientation.

Mackay House

14.23 Mackay House is a 5-storey residential block located south of the site. 56% of windows meet VSC standards, with 83 windows affected by varying reductions in daylight, mainly in kitchens and bedrooms. The Mirror Massing assessment shows minimal reductions in daylight. 99% of rooms comply with NSL, and no APSH assessment is required.

Champlain House

- 14.24** Champlain House, a 5-storey residential block, is located east of the site. 44% of windows meet VSC guidelines, with significant reductions in daylight for 65 windows, mainly in kitchens and bedrooms. For most affected windows, the daylight that will be received is an improvement on the target value that would be derived from using a Mirror Massing approach. 84% of rooms comply with NSL, with some reductions in living areas. With the Proposed Development in place 49% of windows meet sunlight requirements, with some facing west and impacted by overhanging walkways.

Evans House

- 14.25** Evans House, a 5-storey residential block, is located east of the site. 44% of windows comply with VSC, with 31 windows experiencing varying reductions in daylight, mainly in kitchens and bedrooms. The daylight that will be received is only minimally below the target value that would be derived from using a Mirror Massing approach. 91% of rooms comply with NSL, with minor reductions in kitchens and bedrooms. 53% of windows comply with sunlight requirements, with many affected by overhanging walkways and their westward orientation.

St John XXIII Catholic Primary School

- 14.26** This primary school includes 1-2 storey buildings to the north of the site. 91% of windows meet VSC standards, with 10 windows experiencing minor reductions, including 3 with large reductions due to being beneath a brise soleil structure. 97% of rooms comply with NSL, and all windows facing within 90 degrees of due south comply with sunlight requirements.

St John XXIII Catholic Nursery

- 14.27** Located to the east of the primary school, the nursery has a single-storey building. Only 25% of windows meet VSC standards, with 6 windows experiencing minor reductions. All rooms experience minor reductions in NSL but retain good daylight distribution. Sunlight compliance is met for windows facing within 90 degrees of due south.

Open Space/Overshadowing

- 14.28** The Report includes an overshadowing assessment, which illustrates the effect of the Proposed Development on sunlight availability (sun on the ground) to the playgrounds located immediately to the north of the site. These are the St John XXIII Catholic Primary School playground (Area A1) and the St John Catholic Primary School Nursery playground (Area A2).
- 14.29** The results show that both playgrounds would retain very high levels of sunlight availability, with 74.13% of Area A1 and 96.56% of Area A2 receiving at least 2 hours of sun on 21st March, which fully accords with the BRE guidelines for sunlight to amenity space.

Conclusions - Daylight, Sunlight, and Overshadowing

- 14.30** GIA have completed a comprehensive technical analysis of the impact to daylight and sunlight produced by the Proposed Development at White City Central. This includes an assessment of overshadowing in neighbouring playgrounds and amenity space. The design has been rigorously tested throughout the process to minimize any negative impacts on surrounding residential properties.
- 14.31** While some alteration of light to adjoining properties is inevitable when constructing new buildings, the BRE guidelines allow for flexibility depending on site-specific factors. Given the low-rise, partially vacant nature of the existing site and its relationship with surrounding buildings, the Mirror Image approach recommended by the BRE Guidelines has been applied.
- 14.32** The primary analysis compares the daylight and sunlight levels of neighbouring properties before and after the development (Existing vs. Proposed). Additionally, a “Mirror Massing” exercise was conducted, which helps ensure that the new development aligns in height and proportions with existing buildings, providing a fair and equitable level of daylight and sunlight. This approach was particularly relevant due to the linear block configuration of the existing buildings, many of which face one another.
- 14.33** By testing the mirror massing as an alternative baseline, GIA aimed to ensure that the new development would maintain consistent daylight and sunlight levels similar to those already present on the estate. The analysis indicates that some surrounding properties may experience changes beyond the BRE recommendations, but these changes align with the adjusted targets set by the mirror massing. In many cases, the daylight and sunlight that will be received by neighbouring properties is better than the values that would be derived from using a Mirror Massing approach.
- 14.34** It is important to note that the BRE guidelines are intended to be applied flexibly, especially in urban environments. The BRE itself acknowledges that natural lighting is just one aspect of site design. GIA believes that the Proposed Development is appropriate within its context and that it will protect the amenity of neighbouring properties, ensuring sufficient daylight and sunlight in accordance with both the London Plan (2021) and the Hammersmith & Fulham Local Plan (2018). Ultimately, GIA is confident that the impact on surrounding properties falls within the flexible application of the BRE Guidelines.

15.0 HIGHWAYS AND TRANSPORT

- 15.1** The **NPPF** requires that developments which generate significant movement are located where the need to travel would be minimised, and the use of sustainable transport modes can be maximised; and that development should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people.
- 15.2** In determining this application, consideration has been given to the requirements of **Policies GG2, GG3, T1, T2, T4, T5, T6, T6.1 and T7 of the London Plan**, as well as the Healthy Streets for London strategy, published by TfL in 2017, in assessing the effects on the local highway network along with the proposed car parking, cycling parking and servicing requirements. London Plan Policy T6 and T6.1 state that proposals should encourage the reduction in the need to travel, especially by car.
- 15.3** **Policies T1, T2, T3, T4, T5 and T7 of the Local Plan** which relate to traffic impact/transport assessments, car parking standards, cycle parking, encouraging walking have been considered. Policy CC7 sets out the requirements for all new developments to provide suitable facilities for the management of waste. **Planning SPD (2018) Key Principles WM1, WM2, WM7 and WM11** are also applicable which seek off-street servicing for all new developments.
- 15.4** The planning application is supported by a Transport Assessment (TA) which includes a Healthy Streets Assessment, Delivery / Servicing Plan, Travel Plans and Operational Waste Strategy. The Transport Assessment assesses the impact on trip generation, car and cycle parking, access arrangements, delivery and servicing. The TA has been reviewed by the Council's Transport and Highways Officer who raises no objections to the proposals subject to planning conditions and obligations.
- Pedestrian and cycle access strategy**
- 15.5** Currently the site is accessible by both pedestrian and cycle to the west and east via both Australia Road and New Zealand Way. In terms of vehicular access, the site is accessible from two access points to the west of the site, one via Australia Road onto Bridget Joyce Square and the second off India Way onto New Zealand Way. Australia Road is currently a no through route for vehicles with a gate on the eastern side.
- 15.6** The access strategy for the Proposed Development is to create a permeable, well-connected, easy to navigate site which allows all residents, regardless of mobility, to walk or easily use a wheelchair to / from their home. The new public realm will be paved with high-quality materials and will be level to ensure the site is accessible to persons of all mobilities. Landscaping will be used to create an attractive space which feels welcoming and therefore promotes journeys on foot.

- 15.7** The Proposed Development will provide new areas of public realm, between the residential blocks. The new public realm at Bridget Joyce Square will involve the creation of an attractive, permeable site which will ensure the site feels connected to the local area and creates a pedestrian-friendly space, therefore encouraging both existing and future residents to undertake many of their day-to-day journeys on foot.
- 15.8** The Proposed Development will improve the connectivity for pedestrians through the site to the east, west and south improving walk times to those who are looking to access areas to the east such as White City and Wood Lane Underground and Shepherd's Bush Bus and Rail Stations.
- 15.9** The site is well connected to a series of cycle routes linking through the borough and the increased permeability of the site will improve upon this. Landscaping will be used to create an attractive space which feels welcoming and therefore promotes journeys by bike.
- 15.10** The White City area is an integral part of the London Cycle Network, and there is significant potential for journeys to and from the site to be undertaken by bicycle. There are no cycle routes provided immediately adjacent to the Proposed Development site. However, south of the site, on South Africa Road, dedicated on-road cycle lanes for the majority of its extent are provided. To the east, upon connection to Wood Lane, further on-road cycle lanes are provided. The majority of the route to White City and Wood Lane underground stations can be undertaken on cycle lanes. In addition, cycleway CS34 can be accessed from the north of the site, on Westway. CS34 can be used for connections to North Acton and towards the centre of London via other cycle routes.
- 15.11** The pedestrian and cycle strategy includes a S278 highways works planning condition that secure highways improvement works at the Australia Road junction with India Way and the Australia Road junction with Canada Way at the locations where the new public realm interfaces with the public highways.
- 15.12** The S278 works will include the provision of green features such as rain gardens and tree planting along the Australia Road corridor extending from Bridget Joyce Square westwards to Bloemfontein Road and Bridget Joyce Square eastwards to South Africa Road creating a green east / west corridor through the estate that links to and through the new public realm space. In addition, the S278 works will include improvements to the lighting and signage on pedestrian link that connects South Africa Road to Australia Road, which will improve pedestrian connectivity and wayfinding between the application site and the bus stops on South Africa Road.

Vehicular Access

- 15.13** Currently the site is only accessible from two access points to the west of the site, one off Australia Road onto Bridget Joyce Square and the second off India Way onto New Zealand Way. The Proposed Development aims to reduce reliance on cars, the proposed vehicular access strategy will provide one vehicular access point to the south off the Mackay House access road. A single access point with internal turning head will be formed through the site with all vehicles accessing the site from the southern access at Mackay House and then turning via a dedicated turning head.
- 15.14** The proposed vehicular access point has been designed to the relevant Manual for Streets (MfS) and Design Manual for Road and Bridges (DMRB) standards. The internal site access road design has been subject to a Stage 1 Road Safety Audit (RSA). A detailed design post construction stage 2 & 3 Road Safety Audits will be secured by planning condition. A Parking Management Plan will also be secured by planning condition, it will include details of measures to manage parking in the proposed turning head.
- 15.15** An emergency access is also provided at the north-eastern corner of the site although this will only be used if an emergency vehicle / fire tender is required to access the northern section of Block B.

Car Parking

- 15.16** **London Plan Policy T6 (Car parking)** state that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking. Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy.
- 15.17** **Local Plan policy T4 (Vehicle Parking Standards)** states that: "The Council will only consider the issuing of permits for on street parking in locations where the PTAL level is considered 2 or lower (TfL's public transport accessibility level)."
- 15.18** **Local Plan Policy T5 (Blue Badge Parking Provision)** sets out that off-street, car parking for Blue Badge Holders is a requirement in residential development if vehicular access is available.
- 15.19** The existing site currently accommodates parking that is used for the existing nursery (including the family annex building and the adventure playground), the housing office and a small number of spaces within the boundary of the community centre. A total of 14 parking spaces are located in front of the nursery at Bridget Joyce Square, a total of 10 parking spaces are located on New Zealand Way in front of the community buildings and housing office, and 2 spaces are provided within the community centre site boundary.

- 15.20** It is proposed that the site will be car free with the exception of blue badge parking and the re-provision of the community use and nursery parking. Blue Badge parking will be provided in line with the London Plan with 3% of the dwellings (8 spaces) from the outset and space for an additional 7% (18 spaces) will be allowed for within the design. The Proposed Development will provide a total of 32 parking spaces.
- 15.21** Demand will then be monitored, with further blue badge spaces provided, if required, up to a provision that equates to 10% of units. A Parking Management Plan secured by planning condition will include details of allocation and monitoring of future demand for the blue badge parking spaces at the site.
- 15.22** In order to provide the access to the south of the site and improve the public realm a total of 19 parking spaces will be removed and re-provided for residents of the White City Estate, located adjacent to Mackay House. A total of 3 parking spaces will also be re-provided on site for the nursery and 3 parking spaces provided for the community hub.
- 15.23** A parking beat survey was undertaken on two neutral weekday nights as per the Lambeth survey methodology, and on a neutral weekday morning to establish the level of parking demand for the surrounding residential area and during the existing nursery drop of time period. The survey dates were Tuesday 12th September 2023 and Wednesday 13th September 2023. The parking survey was undertaken once between 00:00-05:30 during both evening surveys, and a spot parking beat was undertaken at 08:00 on the 13th of September.
- 15.24** The parking beat survey was undertaken for the local area surveying a 200m radius, as per Lambeth parking survey guidance. The majority of the roads contained within the parking beat survey are subject to permit holder only parking, pay and display parking, or time restricted parking. Within the survey area there are a total of 846 car parking spaces, of these, 464 spaces are Permit Holder / 8 Hour Pay and Display Mon - Sat 0900-1700 and 382 spaces are Permit Holder Only Mon- Sat 0900-2030. The survey results indicate that there are 211-351 available car parking spaces on roads surrounding the site at any one time.
- 15.25** During the 12th of September 2023 03:00 beat the parking survey undertaken recorded 635 parked vehicles, providing a parking occupancy percentage of 75.0%. During the 13th of September 2023 03:00 beat the parking survey undertaken recorded 620 parked vehicles, providing a parking occupancy percentage of 73.2%. During the 13th of September 2023 08:00 beat the parking survey undertaken recorded 495 parked vehicles, providing a parking occupancy percentage of 58.5%. The survey results did indicate that parking is approaching capacity on some streets, although parking does not exceed the available capacity on any roads during this period.

- 15.26** The parking beat results indicate any overspill as a result of the development can be accommodated within the local network. A permit free obligation will be secured that restricts future occupiers from obtaining parking permits in the vicinity of the site (except blue badge holders) to limit overspill parking in the surrounding area. A parking review obligation will also be secured, so parking demand within the White City Estate can be reviewed post completion / occupation of the development.

Electric charging

- 15.27** 25% of parking spaces (7 spaces) for the residential units will be provided with active charging facilities with the remaining 75% (19 spaces) provided with passive provision. This is in line with Policy T6.1 of the London Plan. The electric charging facilities will be secured by planning condition, and demand will be monitored through the Parking Management Plan condition.

Car Clubs

- 15.28** Car club is a membership scheme that offers people use of a car on a pay-as-you-go basis. The scheme saves the additional costs and inconvenience of residents owning or using their own car and means that residents have easy access to a car for those occasional journeys
- 15.29** Currently the closest Zipcar Car Club space to the site is located on Australia Road, approximately 50m west of the site. There is one car in this location. Zipcar also provides rental vehicles near to Shepherd's Bush station. A single car available to hire is located 1.5km to the east of the site at Shepherd's Bush station. Car club membership will be secured as measure in the Travel Plan for the site, offering car club use as an alternative to car ownership for new occupiers at the site.

Cycle Parking

- 15.30** **London Plan Policy T5 (Cycling) and Local Plan Policy T3 (Increasing and promoting Opportunities for Cycling and Walking)** seek to develop and promote a safe environment for cyclists across the borough to encourage residents and businesses to consider these modes. Policy T3 seeks to increase and promote opportunities for cycling through the provision of convenient, accessible, and safe secure cycle parking within the boundary of the site. Appendix 8 of the Local Plan seek to ensure that satisfactory cycle parking is provided for all developments.
- 15.31** To further encourage and support the Mayor's target for 80% of all trips in London to be made by foot, bicycle or public transport by 2041, a total of 457 cycle parking spaces will be provided for the proposed residential units. Cycle parking will also be provided for both the nursery and community centre in line with the London Plan parking cycle parking standards.
- 15.32** Of the 457, 451 will be long stay spaces and a further 6 will be short stay spaces. Cycle parking will also be provided for the nursery and community centre in line with the London Plan standards. With a total of 1 long stay spaces and 18 short stay spaces being provided for the community centre

and 4 long stay space and 18 short stay spaces being provided for the nursery. The details of the proposed cycle parking will be secured by planning condition. The layout of the cycle stores and parking spaces will be designed in accordance with the standards contained within Chapter 8 of the London Cycle Design Standards. And 5% of the proposed cycle parking provision will be suitable for accessible / larger cycles.

- 15.33** In addition, there are a number of cycle hire cycles and Santander Cycle Docking Stations within close proximity to the site which can be utilised by residents without access to a private bicycle. The area surrounding the site benefits from a number of existing cycle parking spaces a total of 105 docking stations for Santander Cycles are located at Westfield Ariel Way (40 docking station spaces), BBC White City (36 docking station spaces); and Westfield Library Corner (27 docking station space).

Public Transport Accessibility

- 15.34** Public Transport Accessibility Levels (PTAL) are measure which rates locations by distance from frequent public transport services. The application site has a measured PTAL ranging from 1b to 2, with most of the site falling within 2.

- 15.35** With the implementation of the committed Ed-City development (which is under construction) directly to the east of the site walk distances to the east will be shortened and improved. As a result, the site will be within 700m (from the centre of the site) of White City London Underground Station. A manual PTAL calculation of the site indicates that the site once this committed development is complete the PTAL of the site will increase to 4 which is considered a good level of accessibility to public transport.

Buses

- 15.36** Queens Park Rangers FC Bus Stop is located to the south of the development on South Africa Road approximately 75m from the south western boundary of the site, requiring a 2- minute walk. The bus stop has seating, is sheltered and is served by services 228 and 283. The nearest bus stop to the site is served by frequent local bus services and provide local connections to Shepherd's Bush, Hammersmith and other local destinations. These services would allow future residents the opportunity to travel locally using sustainable modes.

Rail

- 15.37** The closest railway station to the site is Shepherd's Bush Railway Station, approximately 1.5km comprising an 18-minute walk south-east of the site and is part of the Southern Interchange. It connects to the West London Line and the Southern Line. The railway station is served by London Overground.
- 15.38** Shepherd's Bush Railway station provides up to 5 services towards Stratford, 6 services to Clapham Junction and 1 service to Milton Keynes Central per hour. As a result of the improved permeability through the site

and internal pedestrian/cycle links, the walk time for existing and future residents to the train station will be minimised.

Underground

- 15.39** The closest underground railway station to the site is White City, approximately 800m representing an 8-minute walk east of the site along South Africa Road and Wood Lane. White City underground station is on the Central Underground Line. White City underground station provides up to 8 services towards Epping and West Ruislip per hour. Additional services can be accessed from Wood Lane underground station, which is located 750m from the Proposed Development, equivalent to a 9-minute walk from the site. Wood Lane connects to the Hammersmith & City Underground line and the Circle Underground line.

Healthy Streets Approach

- 15.40** The Healthy Streets Approach is a system of transport policies and strategies to help Londoners reduce single occupancy vehicle movements and encourage walking, cycling and the use of public transport. The overall aim of the Healthy Streets Approach is to help create a vibrant city where people can live active and healthy lives by putting this ethos at the heart of decision making.
- 15.41** The Healthy Streets Approach is based on ten indicators which describe the experience of people using streets. The indicators are essential for a healthy street environment. The ten indicators are:
- Pedestrians from all walks of life.
 - People choose to walk, cycle and use public transport.
 - Easy to cross.
 - Shade and shelter.
 - Places to stop and rest.
 - Not too noisy.
 - People feel safe.
 - Things to see and do.
 - People feel relaxed; and
 - Clean air.
- 15.42** The ten indicators have informed the design principles and transport strategy for the Proposed Development. The proposed public realm which includes multiple outdoor spaces including 'The Community Adventure Playground' and 'The Community Garden' within the site has been designed to consider the needs of all pedestrians and users. This has been achieved by designing the public realm with sufficient width to accommodate multiple pedestrians including those who are physically impaired and may require more space to move through the site. Furthermore, the gradients of walk routes are as shallow as possible to create easy walking conditions for all users. People choose to walk, cycle and use public transport

Active Travel Zone (ATZ)

- 15.43** A daytime and nighttime Active Travel Zone (ATZ) audit (against the 10 healthy streets indicators) was undertaken of the key walking and cycling routes in the vicinity of the application site.
- 15.44** Within the ATZ, the routes to key destinations and facilities have been mapped. The seven destinations assessed were: -
- Route 1: Site – South Africa Road Bus Stop.
 - Route 2: Site – Wormholt Park.
 - Route 3: Site – White City Station.
 - Route 4: Site – Wood Lane Station.
 - Route 5: Site – White City Bus Station.
 - Route 6: Site – Shepherds Bush Market Station; and –
 - Route 7: Site – India Way.
- 15.45** As per the Healthy Streets Transport Assessment Guidance, commentary on the 'worst' part of the journey to each of the above destinations has been provided to highlight issues and help identify potential improvements to support sustainable travel to/from the application site.
- 15.46** The audit of Route 3 to White City Underground Station highlighted a high and steep kerb at the crossing point of the entry to Wood Lane Estate. This steep kerb does not have any tactile paving to assist vision impaired footway users. A S278 condition will be secured to install tactile paving to this crossing point to make this route accessible to all.
- 15.47** The audit of Route 7 to India Way to access London Cycleway 34 identified that the space available for cyclists to use is considerably reduced due to the on-street parking that is provided on both sides of the road. This does not leave enough space for a car and cyclist to comfortably pass each other on the road. The speed bump in the middle of the road may also deter some less experienced cyclists from using this route to access London Cycle 34. A S278 condition will be secured to provide measures to make this section of the route accessible and safer for cyclists.

Trip Generation

- 15.48** The TA that has been submitted with this application outlines existing and projected trip generation and modal split. The TA outlines how the proposals result in a negligible impact on the local transport network.
- 15.49** The Nursery and Community centre are existing and are being re-provided on site so the net impact (in terms of trip generation) of providing these uses would be negligible. The development will be predominately car-free (permit free), with only 26 Blue Badge car parking spaces provided in line with London Plan parking standards. As such, it is estimated that the majority of the car driver trips would be generated by 26 of the 253 units.
- 15.50** A review of TRICS database has been undertaken to determine the trip generation associated with the proposed residential element of the

development. The trip generation data shows that the Proposed Development would be expected to generate 143 two-way person trips within the AM peak hour and 116 two-way movements in the PM peak hour.

- 15.51** The Proposed Development will lead to an increase in pedestrian and cycle trips and public transport trips to and from the site. The change in demand, when balanced against the quantity and quality of the existing pedestrian and cycle networks and public transport networks means that the additional trips associated with the Proposed Development will not have a noticeable effect on the capacity of these networks. The assessment of all sustainable transport modes suggests that the transport demand of the Proposed Development can be accommodated on the public transport, walking and cycling networks.
- 15.52** In total, the development will generate up to 132 two-way walking trips in either peak period. This equates to approximately one pedestrian trip arriving or departing the site every 25 seconds. Trips which are undertaken wholly on-foot are likely to be distributed over a variety of routes surrounding the development.
- 15.53** The multi-modal trip generation of the Proposed Development considered the number of trips generated by the Proposed Development that will utilise public transport networks, including bus, rail and underground. The weekday AM and PM peak hours represent the busiest time in terms of background public transport trips, so the effects of the Proposed Development on public transport network has been considered during the weekday AM and PM peak hours.
- 15.54** It is anticipated that all trips by bus will be undertaken from the most local bus stops situated on South Africa Road. The Proposed Development is likely to generate up to 37 two-way bus trips in the PM peak period. Bus stops on South Africa Road benefit from two frequent bus services, the 228 service which operates three times an hour during peak periods, and the 283-bus service which operates six times per hour during peak periods. Assuming that an equal number of development-generated bus users access each bus, 33.3% of bus trips will use the 228 service, whilst 66.6% will use the 283 service. At most, in either peak hour, there will be an additional 25 bus passengers on the 283-bus service. This service benefits from 6 buses per hour and this equates to an additional 4 passengers per bus as a result of the development.
- 15.55** The Proposed Development is likely to generate up to 11 two-way rail trips, this occurs during the PM peak period. Due to the location of the development, it is anticipated that all development trips undertaken by rail will be made to Shepherd's Bush Overground station to the southeast of the site. Shepherd's Bush overground benefits from two frequent rail services, providing access to Stratford five times per peak hour, and Clapham Junction five times per peak hour. Assuming that an equal number of development-generated rail users access each train, 50% of rail trips will be made towards Clapham, whilst the remaining 50% will be made towards

Clapham Junction. At most, during either peak hour, there will be an additional 6 rail passengers on either rail service. Both services benefit from 5 trains per hour and this equates to just over 1 additional passenger per train as a result of the development.

- 15.56** Due to the location of the development, and the services available at surrounding underground stations, it is anticipated that development trips undertaken by underground modes will be split equally between White City Underground and, Wood Lane Underground stations. The Proposed Development is likely to generate up to 31 two-way underground trips, this occurs in the PM peak period. During the busiest peak hour, a total of 16 two-way trips will be made to each local underground station. This equates to less than one trip every 3 minutes and is unlikely to be considered significant.

Delivery and Servicing

- 15.57** A Delivery and Servicing Management Plans (DSMP) has been submitted with the planning application. This document sets out how on-site deliveries and refuse collection will be managed. Deliveries to Blocks C, D, G and the Nursery will take place on the site perimeter with deliveries for Blocks B, E and F and the Community Centre taking place from the central internal loading bay. The lay by will also be used by the nursery for SEN drop off pick up requirements if required.
- 15.58** The use of the layby will be coordinated with the nursery to ensure that no servicing trips are undertaken during the SEN nursery pick and drop off times. The internal access road and loading bay has been designed to accommodate a 10m rigid HGV / a refuse collection vehicle as a minimum.
- 15.59** The predicted daily delivery and servicing vehicle trips for the Proposed Development were calculated using the servicing trips rates from comparable residential schemes within TRICS. The Proposed Development is expected to generate 28 deliveries per day, two are likely to arrive and depart in the weekday AM peak hour and two are likely to arrive and depart in the weekday PM peak hour. With regard to the nursery and community centre the level of deliveries per day is likely to be nominal with a maximum of two deliveries per day considered a worst-case estimate. Swept path analysis has been undertaken to show a delivery and refuse vehicle accessing the internal road and loading bay for the proposed site.
- 15.60** Refuse collection associated with Blocks C, D, G and the Nursery will take place on-street. Refuse collection associated with Blocks B (Southern Section) E, F and the Community Centre will take place via the internal loading bay. The Community Centre bin store will be located directly adjacent to the Block B southern bins store. A communal refuse store for Block B northern will be provided which will be located within 10m of the highway and 25m from the Block to ensure that maximum drag distances for Eurobins are not exceeded and therefore refuse collection operatives will be able to collect directly from the refuse stores. All of the refuse collection locations conform with the LBHF SPD carry distance of 25m for residents

and 10m for refuse collection personnel. The Delivery and Servicing Plan will be secured by planning condition and associated monitoring fees will be secured via a Planning obligation.

Fire Tender and Emergency Access

- 15.61** The masterplan layout has been designed to ensure that fire tender and emergency vehicles can access each building within the site at all times. All dry riser inlets are accessible within 18m from the either the site perimeter or via the internal access roads. The northwest of the site the dry riser inlet at Block B will be accessed by the fire tender via hard standing landscaping which will be designed with a vehicle corridor of a minimum 3.7m width, which is suitable to provide access to fire tenders and allow them to operate safely when they have reached their destination within the site.
- 15.62** In order to accommodate this vehicle corridor and fire tender tracking a total of 14.7m of existing on street parking is required to be removed to the east of the site along Canada Way. However, this loss can be reaccommodated further south so there is no loss of on street parking. Swept path analysis has been undertaken to show a fire tender accessing the proposed site via the internal access road. The rearrangement / reprovion of parking will be included in the S278 highways works planning condition.
- 15.63** An indicative routing plan showing how construction traffic is currently anticipated to access/depart the site on the strategic road network is included in the documents. Construction traffic arriving from the north of the site would access the site via Westway to the west and south via Uxbridge Road and to the east via South Africa Road with all routes ending up on Bloemfontein Road. Construction vehicles will then turn onto Commonwealth Avenue then India before turning left into the site off Australia Road. Construction traffic leaving the site will route via Australia Road west before reaching Bloemfontein Road. Construction vehicles routing west will then route to Westway with those routing west using Uxbridge Road and those routing north and south using South Africa Road and Wood Lane.

Construction Logistics

- 15.64** In accordance with **Local Plan Policies T2 an T7** an Outline Construction Logistics Plan (CLP) has been submitted in accordance with Policy T7 of the Local Plan. Final documents including works associated with the demolition phase would be required to include construction vehicle routing, updated construction vehicle numbers, and other matters relating to traffic management to be agreed. Indicative construction vehicle movements including routing have been provided.
- 15.65** The application includes both an Outline Demolition Logistics Plan (ODLP) and an Outline Construction Logistics Plan (OCLP), which outline measures to ensure safe and efficient vehicle movements during demolition and construction, minimize impacts on local traffic, and reduce environmental effects.

- 15.66** The plans specify the types and sizes of construction vehicles required for each phase, along with expected vehicle movements per day. The Site Manager will oversee the development and implementation of a Site Traffic Management Plan in line with HSG144 guidelines.
- 15.67** To minimize disruption, vehicle routing follows a priority system: (1) Motorways, (2) Primary Road Networks, and (3) Local Roads. Routes aim to avoid residential roads and those with HGV or width restrictions.
- 15.68** An indicative routing plan showing how construction traffic is currently anticipated to access/depart the site on the strategic road network is included in the documents. Construction traffic arriving from the north of the site would access the site via Westway to the west and south via Uxbridge Road and to the east via South Africa Road with all routes ending up on Bloemfontein Road. Construction vehicles will then turn onto Commonwealth Avenue then India before turning left into the site off Australia Road. Construction traffic leaving the site will route via Australia Road west before reaching Bloemfontein Road. Construction vehicles routing west will then route to Westway with those routing west using Uxbridge Road and those routing north and south using South Africa Road and Wood Lane.
- 15.69** All drivers will receive training and a routing plan to ensure compliance. Wheel washing facilities will prevent debris on local roads. Deliveries will be scheduled using a web-based system to avoid peak traffic hours (08:00-09:00 and 17:00-18:00).
- 15.70** A final, detailed Demolition and Construction Logistics Plan will be secured via standard planning conditions. In addition, a construction workers Travel Plan will be secured by planning condition and associated monitoring fees will be secured via a Planning obligation to manage the movements associated with the arrival and departure of the construction workforce. It is forecast that the staff will travel to the site via public transport, walking and cycling.
- 15.71** A final Construction Management Plan will be agreed with the Local Planning Authority via a pre-commencement condition, in line with Local Plan 2018 Policy T7 and Planning Guidance SPD Key Principle TR21. Details shall include control measures for delivery locations, numbers, size and routing of construction vehicles and other matters relating to traffic management to be agreed.

Delivery and servicing

- 15.72** The application includes a Delivery and Servicing Management Plan (DSMP) by SLR, detailing the strategy for deliveries, servicing, and refuse collection to minimize impact on the local highway network and residents.
- 15.73** Vehicular access will be via existing estate roads on the eastern and southern sides, with a single access point on the southern edge near Mackay House. This leads to an internal turning head and central loading bay. Deliveries to Blocks C, D, G, and the nursery will be made along the estate roads, while deliveries to Blocks B, E, F, and the Community Hub will occur at the central loading bay, which can also be used for the nursery's SEN drop-offs and pick-ups.
- 15.74** The DSMP includes swept path analysis showing that refuse vehicles can safely collect waste on-site, entering and exiting in forward gear. Anticipated servicing trip rates are based on similar residential developments, with the residential element expected to generate 28 two-way deliveries per day, including 4 two-way trips during peak hours. The nursery and community centre are expected to generate up to 2 deliveries per day.
- 15.75** To reduce congestion, deliveries will be encouraged outside peak hours (08:00-09:00 and 17:00-18:00). These measures will be formalized in the final Delivery and Servicing Plan, secured through a planning condition.

Operational Waste Management Plan

- 15.76** The application includes an Operational Waste Management Plan (OWMP) outlining a waste strategy aligned with the Waste Hierarchy. It details sustainable waste management principles to minimize environmental impact. The OWMP specifies refuse and recycling storage for each block/core, ensuring it meets the Council's waste capacity requirements for general waste, dry recycling, and food waste.
- 15.77** Refuse collections will follow the same routes as deliveries and servicing. Eleven bin stores will be provided: six along the site's perimeter on India Way and Canada Way, and five from the internal access and loading bay. All bin stores are designed to meet the Council's standards, with a maximum carry distance of 10 meters for collection staff and 25 meters for residents.

Travel Plan

- 15.78** The site is located close to numerous public transport opportunities. Furthermore, the location of the site means that a large number of destinations for work, shopping, education and leisure can be reached by walking and cycling. Given this, separate Travel Plans have been prepared for the proposed residential units, the nursery and the community centre respectively, in order to encourage sustainable travel behaviour.
- 15.79** Framework Travel Plans (FTP) have been prepared for the nursery, community hub and residential uses, which set out a range of preliminary management strategies and measures to support and encourage

sustainable travel. The primary objective of the Travel Plans is to set out a long-term strategies to facilitate and encourage travel to the site by sustainable modes of transport. The initiatives and measures that form part of the Travel Plans are a mixture of 'hard' and 'soft' measures. The 'hard' measures include the provision of facilities such as safe and secure cycle parking. The 'soft' measures include initiatives such as providing information on public transport services and the health benefits of walking and cycling. The Travel Plans will be secured by planning condition and associated monitoring fees will be secured via a Planning obligation.

- 15.80** In summary, subject to the above obligations and conditions, the Council's Highway officers consider that the proposal would not result in a severe impact on the highway network and is acceptable having regard to all relevant policies.

16.0 ENERGY AND SUSTAINABILITY

- 16.1** **Section 14 of the NPPF** seeks to ensure that developments plan for climate change.

- 16.2** **London Plan Policies SI 2 (Minimising greenhouse gas emissions), SI 3 (Energy infrastructure) and SI 4 (Managing heat risk)** require that development proposals should minimise carbon dioxide emissions and exhibit the highest standards of sustainable design and construction, provide on-site renewable energy generation and seek to connect to decentralised energy networks where available or design their site so it is future-proofed and capable of connecting if there are further developments in the area in the future.

- 16.3** **Policies SI 2 and SI 3** set out how new development should be sustainable and energy saving. Under **Policy SI 2 of the London Plan**, major developments must achieve net zero-carbon performance. These developments are expected to meet or exceed carbon reduction targets through on-site measures, achieving a minimum of a 35% reduction in emissions beyond Building Regulations. For major residential developments, the benchmark is a 50% reduction in carbon emissions as per the GLA Energy Assessment Guidance. Where it is clearly demonstrated that net-zero carbon cannot be fully achieved on-site, any shortfall can be provided either: 1) through a cash in lieu contribution to the borough's carbon offset fund, or 2) off-site provided that an alternative proposal is identified, and delivery is certain.

- 16.4** The Council currently uses the GLA's £95/tonne for carbon offset payments, which is considered not to fully cover local reduction costs or incentivize developers to maximize on-site measures. The London Plan encourages Boroughs to adopt their own local cost of carbon.

- 16.5** In 2024, the Council commissioned a **Carbon Pricing Viability Assessment** to assess and test the viability of different development types to accommodate a range of carbon offset rates in order to better reflect the costs of implementing local carbon reduction measures and encourage maximisation of on-site carbon reduction measures. This assessment looked at two approaches: a single higher cost or a sliding scale with lower costs for higher on-site reductions.
- 16.6** A report will be presented to **Cabinet on 1 April 2025** seeking approval to publish a carbon offset cost guidance note. If approved, this guidance note will establish set a new “sliding scale” approach to calculating carbon offset payments for major new developments based on the local carbon pricing mechanism set out in the guidelines (rather than the current GLA cost of £95/tonne). Developments would still be required to maximise carbon savings through on-site measures before resorting to use of the offset payment. The “sliding scale” approach proposed in the guidance note is intended to encourage this approach and incentivise developers to include more on-site carbon reduction measures.
- 16.7** **The Local Plan (2018)** outlines the Council’s goal to make the borough the greenest and environmentally sustainable by 2035. This includes requiring new developments to reduce energy use, minimize non-renewable resources, and promote low or zero-carbon technologies to cut carbon emissions and harmful air pollutants. Major developments, in particular, will be held to these standards, as buildings are the primary source of carbon emissions in H&F.
- 16.8** **Local Plan Policy CC1 (Reducing Carbon Dioxide Emissions)** requires all major developments to implement energy conservation measures with a view to reducing carbon dioxide emissions. The policy, however, refers to the previous version of the London Plan and as such has been partly superseded by the more up to date requirements contained in the new London Plan. **Local Plan Policy CC2 (Sustainable Design and Construction)** seeks to ensure the implementation of sustainable design and construction measures by implementing the London Plan sustainable design and construction policies.
- Energy and Sustainability**
- 16.9** Combining all the carbon saving measures encouraged by the London Plan Energy hierarchy of ‘be lean’, ‘be clean’, and ‘be green’, this development is anticipated to reduce CO2 emissions on Site by 62% for the domestic part of the development and 28% for the non-domestic element resulting in a site wide reduction of 102 tonnes of CO2 a year compared to a baseline of 258 tonnes for a Building Regulations compliant scheme. At the ‘Be Lean’ stage, the Proposed Development meets the GLA target of 10% regulated CO2 emission reductions for the residential portion of the scheme (achieving 11%), but the 15% reduction target for the non-residential element of the scheme is not met. This currently demonstrates a 4% improvement through energy efficiency measures which is equivalent to a 0.5 tonne reduction in CO2 emissions. Meeting the 15% target can be difficult for non-residential

schemes but a condition is included requiring the submission of a revised Energy Strategy which will provide details of any additional energy efficiency measures incorporated at design stage along with an assessment of their carbon reduction performance. The non-residential element of the scheme represents a relatively small proportion of the total CO2 emissions of the whole site (13.3 tonnes of CO2 a year for the baseline scheme compared to 244.6 tonnes for the residential element). To meet the 15% figure would require additional savings of 1.5 tonnes of CO2 to be found.

- 16.10** In respect of 'Be Clean' (supply energy efficiently) the application site is located to a Heat Network Priority Area (HNPA). However, there are currently no existing District Heating Networks (DHNs).
- 16.11** The proposed strategy aims to future-proof the development by providing on-site community heating for all dwellings, with provisions for easy integration into a DHN if one becomes available. Since no existing heating/cooling networks are available, localised plant rooms will be installed at ground level within each block, while the nursery and community centre will have their own independent systems.
- 16.12** Air Source Heat Pumps (ASHPs) are chosen as the best technology for heating, as they work efficiently at lower delivery temperatures.
- 16.13** The use of localised plant rooms minimizes distribution losses, improving overall system efficiency and resilience. This setup ensures each building has access to low-carbon heat from the start and prevents reliance on the development's phasing. If a plant room fails, only one block will be affected, ensuring security for residents.
- 16.14** At the 'Be Green' stage the renewable technologies feasibility study carried out for the development identified photovoltaics (PV) and ASHPs as suitable technologies for the development. The incorporation of renewable technologies contribute CO2 emissions reductions of 51% for the residential units and 24% for the non-residential elements of the scheme.
- 16.15** In order to achieve the London Plan requirement for major developments to meet net zero carbon emissions, the remaining emissions would need to be offset by a payment-in-lieu contribution. The proposed carbon offset cost guidance note (paragraph 16.6 above) has not been presented to Cabinet for approval at the time of publication of this committee report. If the Cabinet approved the Guidance Note, officers will give further advice to the Planning Committee at the committee meeting.
- 16.16** The application includes a Part O Summer Overheating Report, detailing design measures to reduce overheating following the London Plan cooling hierarchy, implementing passive measures wherever possible to manage heat. Active cooling is only proposed for limited areas in the non-residential uses where high occupancy levels could cause potential overheating risks. It confirms that all tested dwellings comply with Part O (2021) of the Building Regulations and CIBSE TM59:2017. Communal corridors were assessed,

and the proposed natural ventilation strategy meets the CIBSE TM59:2017 recommendations. A Non-domestic Overheating Assessment for the Nursery and Community Hub, conducted according to CIBSE Guide A and TM52:2013, shows that the buildings pass, though some rooms (e.g., the main hall, family centre, and offices) may require external air tempering during peak periods. The report recommends adding cooling systems in these areas to maintain acceptable internal temperatures.

- 16.17** A BREEAM Pre-assessment has been undertaken for the proposed day nursery and community centre (i.e. the proposed non-residential uses) and the results indicate that the day nursery and community centre are capable of attaining BREEAM 'Excellent'. It is anticipated that a planning condition would be included to secure the final BREEAM certification confirming that a score of 'Excellent' has been achieved. The residential elements have been assessed using the Home Quality Mark (HQM) scheme and achieve a 4-star rating out of a possible 5 which demonstrates high levels of sustainability. BREEAM and HQM requirements will be secured by condition.
- 16.18** Subject to conditions and a Carbon Offset Payment, officers consider that the development meets the requirements of Policies SI 2, SI 3 and SI 4 of the London Plan 2021 and Policies CC1 and CC2 of the Local Plan 2018 implementing measures wherever possible to provide a high level of sustainability and will ensure the proposal can be considered operationally net zero carbon in line with Policy SI 2. Measures include the following: re-using previously developed land, car free development, encouraging cycle use by providing cycle parking, providing recycling facilities, including water efficiency measures and sustainable energy measures to reduce CO₂ emissions, using sustainable building materials, tree planting that increases biodiversity, flood risk minimisation measures and noise and air quality mitigation measures.

Circular Economy Statement and Whole Life-Cycle Carbon Assessment

- 16.19** The application includes a Whole Lifecycle Carbon Assessment (WLCA), following the GLA's guidance and using the One Click LCA Tool for calculations.
- 16.20** The WLCA assesses the carbon emissions over the entire life cycle of the development and helps inform design decisions to reduce these emissions. The results are provided in the GLA Life Cycle Assessment spreadsheet.
- 16.21** The A1-A5 module emissions for the development covering the impacts of construction materials and the construction phase are calculated at 631.733 kgCO₂e/m², which meets the GLA's benchmark of 850 kgCO₂e/m². Modules B and C of the assessment covering additional activities post construction such as use of the buildings, their repair, maintenance, refurbishment etc also meets the GLA benchmark, performing at 241.821 kgCO₂e/m². This also achieves the more stringent aspirational target of less than 300 kgCO₂e/m².

- 16.22** The Whole Life Carbon Assessment uses GLA methodology to calculate an accurate assessment of the building's carbon impact on the environment. The WLCA was undertaken at an early design stage maximising the opportunity to incorporate carbon-reduction measures and measure these gains. These additional reports have been developed to inform the proposals in line with the Council's commitment to delivering exemplary sustainability standards. The strategy includes:
- Ensuring materials and resource use is minimised in line with the first principle of the circular economy.
 - Ensuring designs are flexible to respond to waste elimination (second principle)
 - Managing demolition/construction and municipal waste to maximise recycling and minimise waste (third principle).
- 16.23** A requirement for the submission of a post construction Whole Life Carbon Assessment will be secured by condition.
- 16.24** The Circular Economy Statement demonstrates the measures in place to incorporate Circular Economy principles within the design, construction, and use of the buildings. It outlines the key principles that will be adopted for the implementation of the scheme to conserve resources and minimise waste (eliminating it where possible). The Statement shows that the 95% targets for the diversion of demolition waste from landfill and for it to be re-used, recycled and/or recovered and for recycling of excavation and construction can be met.
- 16.25** Officers therefore consider that subject to the inclusion of the conditions referenced above and the inclusion of the carbon offset payment in the Memorandum of Understanding, the Proposed Development accords with Policies SI 2, SI 3 and SI 4 of the London Plan 2021 and Policies CC1, CC2 and CC7 of the Local Plan 2018.

17.0 FLOOD RISK DRAINAGE AND WATER RESOURCES

- 17.1** **Section 14 of the NPPF** seeks to meet the challenge of climate change, flooding, and coastal change by supporting the transition to a low carbon future in a changing climate taking account of flood risk and coastal change.
- 17.2** **London Plan Policies SI 12 (Flood risk management) and SI 13 (Sustainable drainage)** outline strategic objectives in relation to flood risk management and sustainable drainage. Local Plan **Policy CC2** requires major developments to implement sustainable design and construction measures, including making the most efficient use of water. Local Plan **Policies CC3 (Minimising Flood Risk and Reducing Water Use) and CC4 Minimising Surface Water Run-Off with Sustainable Drainage Systems)** contain similar requirements designed to assess and mitigate against the risk of flooding and integrate surface water drainage measures into development proposals.

- 17.3** The Site is located within Flood Zone 1 (less than 0.1% annual probability of flooding).
- 17.4** In compliance with the requirement of Local Plan Policy CC3, a Flood Risk Assessment ('FRA') has been submitted in support of this planning application.
- 17.5** The FRA confirms that the risk of flooding from sewers, groundwater, and artificial sources is low, with no recorded instances of sewer flooding on-site. The site includes an existing Sustainable Urban Drainage Systems (SuDS) scheme, consisting of attenuation basins, rain gardens, and permeable paving, designed to reduce runoff from hard surfaces such as Australia Road and the adjacent nursery school car park.
- 17.6** Drainage calculations show that, under existing conditions, the site has a discharge rate of 33.8 l/s for a 1-in-1 year event and 172.5 l/s for a 1-in-100-year event, based on 60% impermeable area. The Proposed Development's drainage strategy, aligned with the Mayor's drainage hierarchy, divides the site into two catchment areas, with each phase of development having its own drainage plan.
- 17.7** To comply with the London Plan and LBHF Local Plan policies, surface water runoff from the site will be restricted to the greenfield rate of 3.4 l/s (or 1.55 l/s/ha), accounting for climate change. The proposed SuDS strategy will include a combination of blue roofs, permeable paving, underground storage, green roofs, swales, and rain gardens, providing a total storage volume of 2,824m³.
- 17.8** The on-site drainage network and SuDS will be privately maintained for the duration of the development, with an indicative maintenance schedule provided. The final maintenance plan will be secured by a planning condition.
- 17.9** Overall, the Proposed Development has a low flood risk, and the SuDS strategy ensures sustainable drainage by reducing the runoff rate to the greenfield rate for the 1-in-100-year event plus a 40% climate change allowance.
- 17.10** Officers therefore consider that subject to conditions requiring compliance with the Flood Risk Assessment and the submission of an updated Sustainable Drainage Strategy, the Proposed Development accords with Policies SI 12 and SI 13 of the London Plan 2021 and Policies CC3 and CC4 of the Local Plan 2018.

18.0 WASTE AND RECYCLING

- 18.1 Local Plan Policies CC6 (Strategic Waste Management) and CC7 (On-site Waste Management)** sets out the Council's intention to pursue the sustainable management of waste and requires all new developments to 'include suitable facilities for the management of waste generated by the development, including the collection and storage of separated waste and where feasible on-site energy recovery'.
- 18.2** The application includes an Operational Waste Management Plan (OWMP) prepared by SLR, outlining a sustainable waste strategy that adheres to the Waste Hierarchy. The plan ensures minimal environmental impact and details the refuse and recycling storage arrangements for each block. It confirms that the stores meet the Council's waste capacity requirements for general waste, dry recycling, and food waste.
- 18.3** Refuse collection will follow the same routes used for deliveries and servicing. Eleven bin stores are provided, with six collected from the perimeter of the site (India Way and Canada Way) and five collected from the site's vehicular access and loading bay. The bin stores are designed to meet the Council's standards, with maximum carry distances of 10 meters for refuse collection personnel and 25 meters for residents.
- 18.4** Subject to the inclusion of conditions requiring the implementation of the submitted documents as set out above, officers consider that the Proposed Development accords with Policies CC6 and CC7 of the Local Plan 2018.

19.0 GROUND CONDITIONS

- 19.1 NPPF Paragraph 196** states planning decisions should ensure that sites are suitable for their proposed new use taking account of ground conditions and after remediation the land should not be capable of being determined as contaminated land.
- 19.2 London Plan Policies SD1 and E7** supports the remediation of contaminated sites.
- 19.3 Local Plan Policy CC9 (Contaminated Land)** ensures that no unacceptable risks are caused to humans, controlled waters, or the wider environment during and following the development works. Key principles LC1-6 of the Planning Guidance SPG identify the key principles informing the processes for engaging with the Council on, and assessing, phasing, and granting applications for planning permission on contaminated land. The latter principle provides that planning conditions can be used to ensure that development does not commence until conditions have been discharged.

- 19.4** The applicant has submitted a Phase 2 ground investigation report which presents the results of site sample testing. Key findings include:
- a) Asbestos was found in two localized areas of topsoil and four areas of made ground, making these unsuitable for re-use in soft landscaping.
 - b) Polycyclic aromatic hydrocarbons (PAHs) were detected in two areas of made ground, which also cannot be reused in soft landscaping.
 - c) The risk to controlled waters is considered low.
 - d) No ground gas protection is needed, and radon levels are below action thresholds, so no radon protection is required.
- 19.5** Additionally, the application includes a Phase 3 Remediation Strategy, which outlines remediation measures to address contamination risks. These include removing contaminated topsoil and installing a 450mm clean capping layer in landscaping areas around the nursery and community centre. For hardstanding areas (such as buildings, roads, and pavements), no further remediation is needed, as the hard surfaces will prevent contaminant exposure.
- 19.6** To ensure proper management of contamination risks, the implementation of the Remediation Strategy should be secured through a planning condition.
- 19.7** Officers consider that potentially contaminative land uses (past or present) are understood to occur at, or near to, this site; or a sensitive use is proposed. Conditions are required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with policies CC9 and CC13 of the Local Plan.
- 19.8** No objection is raised by the Council's Contaminated Land Officers to the Proposed Development or land uses subject to attaching the standard contaminated land conditions relating to investigation and remediation works. Subject to the inclusion of the conditions, officers consider that the Proposed Development accords with Policy SD1 of the London Plan and Policy CC9 of the Local Plan.

20.0 AIR QUALITY

- 20.1 NPPF Paragraph 199** relates to air quality, and states planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan. The Council's Air Quality Action Plan 2025-2030 was approved and adopted by the Council on the 16th of December 2024.
- 20.2 London Plan Policy SI 1 (Improving air quality)**, supported by the Mayor's Control of Dust and Emissions during Construction and Demolition SPG (July 2014), provides strategic policy guidance on avoiding a further deterioration of existing poor air quality. All developments will be expected

to achieve Air Quality Neutral status with larger scale development proposals subject to EIA encouraged to achieve an air quality positive approach.

- 20.3** **Local Plan Policy CC10 (Air Quality)**, states that the Council will seek to reduce the potential adverse air quality impacts of new developments through a range of policy measures.
- 20.4** The site is located within the Council's borough wide Air Quality Management Area (AQMA) for two pollutants - Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀, PM_{2.5}). The site is also in an area of existing poor air quality due to road traffic emissions from Westway (A40), Wood Lane (A219), South Africa Road and Bloemfontein Road. The primary sources of these pollutants in the Borough are road traffic and Combustion Plant to provide space heating and hot water. Accordingly, new developments are required to demonstrate that they will not exceed air quality neutral standards or contribute towards a worsening of air quality at the construction or operational stage, over the lifetime of the development.
- 20.5** The applicant has submitted an Air Quality Assessment (AQA) which is an assessment of the likely significant effects on local air quality as a result of the Proposed Development. The AQA outlines best practices and design measures to minimize air quality effects during operation, as well as strategies to mitigate dust and air quality impacts during demolition and construction.
- 20.6** The baseline review showed only one instance of exceeding the NO₂ Air Quality Objective (AQO) at a monitoring site near a busy road, far from the development site. No other exceedances of NO₂, PM₁₀, or PM_{2.5} AQOs were found near the site. The report predicts that future air quality in the area will exceed WHO guidelines for NO₂, PM_{2.5}, and PM₁₀ by 2035, though national and local policies are expected to help improve air quality by then.
- 20.7** To mitigate air quality impacts, the development will include mechanical ventilation with filtration systems for the nursery, community hub, and residential units, targeting particulate and NO_x reductions. This aims to meet more stringent Council 2030 WHO aligned air quality targets.
- 20.8** The proposed residential element of the Proposed Development would be car free with future residents not being allowed on-street, car parking permits except for blue badge holders who will be allowed to park on-street.
- 20.9** The AQA confirms that the development is Air Quality Neutral (AQN) in terms of building-related and transport emissions. During demolition and construction, dust and PM₁₀ releases are anticipated, but these impacts can be minimized through good practice and mitigation measures, leading to negligible effects. These measures are outlined in a Framework Demolition and Construction Management Plan, with final dust mitigation

details to be secured through a standard planning condition for a Construction Environmental Management Plan (CEMP).

- 20.10** The Council's Air Quality team has reviewed the Air Quality Assessment submitted with the application. It is considered that the Proposed Development will introduce new receptors into an area of poor air quality that currently fails the WHO air quality guideline values for NO₂, PM_{2.5} and PM₁₀. Additional Mitigation measures will be required to make the development acceptable in accordance with policy CC10. Officers recommend that conditions be attached to any approval requiring details to be submitted for approval relating to (1) Air Quality Dust Management Plans (Demolition and Construction); (2) Ventilation Strategy; (3) Ventilation Strategy (Compliance); (4) Green Infrastructure; (5) Zero Emission Heating compliance; (6) Indoor Air Quality, Waste (7) Secondary Mains Electricity Power/Uninterruptable Power Supply (UPS) compliance (8) Waste Water Heat Recovery System (WWHRS), (9) Battery Solar Energy Storage Systems (BSESS), (10) Ultra Low Emission Strategy and (11) Electric Vehicle Charging points.
- 20.11** Subject to the inclusion of conditions prior to the commencement of above ground works of the development to address mitigation measures, officers consider that the Proposed Development can accord with Policy SI 1 of the London Plan 2021, Policy CC10 of the Local Plan 2018 and the Council's Air Quality Action Plan.

21.0 NOISE AND VIBRATION

- 21.1 London Plan Policy D14 (Noise)** sets out measures to reduce, manage and mitigate noise to improve health and quality of life.
- 21.2 Local Plan Policy CC11 (Noise)** advises that noise and vibration impacts will be controlled by locating noise sensitive development in appropriate locations and protected against existing and proposed sources of noise through design, layout, and materials. Noise generating development will not be permitted if it would materially increase the noise experienced by occupants/users of existing or proposed noise sensitive areas in the vicinity.
- 21.3 Local Plan Policy CC13 (Control of Potentially Polluting Uses)** seeks to control pollution, including noise, and requires Proposed Developments to show that there will be 'no undue detriment to the general amenities enjoyed by existing surrounding occupiers of their properties'.
- 21.4 SPD Key Principle NN3**, concerning the sound insulation between dwellings, states that 'Careful consideration should be given to stacking and layout of rooms in relation to adjoining walls/floors/ceilings. To ensure the amenity of occupiers is not adversely affected by noise, the Council expects all parts of adjoining dwellings to enhance the sound insulation, including where the adjoining room is of a similar use.'

- 21.5** The applicant has submitted an Acoustic Report which is a noise impact assessment to identify any site risks and constraints to the development due to existing and future sources of noise and vibration.
- 21.6** The Acoustic Report includes a Noise Assessment by 24 Acoustics, based on environmental noise surveys conducted in October 2021 and August-September 2023. Sound meters were placed at four locations on the Site, and the results showed typical daytime noise levels ranging from 53-55 dB LAeq,16hr and night-time levels between 44-47 dB LAeq,8hr. Road traffic noise is minimal, with the main sources of noise expected to be the proposed play areas and all-weather games pitch.
- 21.7** To mitigate noise from the roof-level nursery play area and all-weather pitch, acoustic screens and timber slats are proposed, along with natural screening from nearby buildings. The all-weather pitch, located on the western wing of the community centre, will cover 177 sqm, be floodlit, and operated by a booking system with restricted use hours (until 21:00). Mitigation will include heavy gauge mesh fencing or soft netting and adherence to a Noise Management Plan, which will be secured by planning conditions.
- 21.8** All new homes will feature mechanical ventilation and heat recovery systems, with recommended glazing and sound installation specifications to meet BS 8233:2014 standards and WHO guidelines, secured by planning conditions.
- 21.9** Additionally, a Plant Noise Assessment has been conducted to evaluate the impact of noise from mechanical plants like Air Source Heat Pumps and air handling units. The assessment shows that plant noise will be at least 9-10 dB below the background noise level at nearby residential properties, ensuring minimal disturbance.
- 21.10** In conclusion, the Proposed Development has been assessed for noise and vibration impacts in accordance with the relevant planning policies, standards and guidance, and it is not considered likely to give rise to any adverse noise impacts on local amenity, and future residents will enjoy a good standard of noise amenity.
- 21.11** During construction, on-site, the implementation of good industry standards, guidance and practice procedures (i.e. Considerate Contractors scheme) will be followed in order to minimise noise effects. Noise and vibration will be managed to reduce impacts, and mitigation measures have been set out within the Construction Management Plan and Construction Logistics Plan secured by conditions.
- 21.12** Subject to the inclusion of conditions requiring the implementation of the submitted documents and submission of further information, officers consider that the Proposed Development accords with the NPPF and Policies CC11 and CC13 of the Local Plan.

22.0 ARCHAEOLOGY

- 22.1** **London Plan Policy HC1 (Heritage conservation and growth)** states that new development should make provision for the protection of archaeological resources. **Policy DC8 of the Local Plan** sets out the principles for the conservation and protection of heritage in the borough.
- 22.2** The site is not located within a locally defined Archaeological Priority Area.
- 22.3** Historic England (GLAAS) commented that there is no need for archaeological investigation in connection with the Proposed Development.
- 22.4** Officers consider that the details submitted sufficiently address the protection of archaeological resources in accordance with Policy HC1 of the London Plan 2021.

23.0 FIRE STRATEGY

- 23.1** With the introduction of **Policy D12 in the London Plan** and updates to Planning Practice Guidance in relation to fire safety, the applicant has prepared a Fire Safety Statement prepared by a suitably qualified third-party assessor, to demonstrate that the Proposed Development has been designed to offer a safe environment for residents. **Policy D5** further seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings.
- 23.2** The application is supported by a London Plan Fire Statement, together with detailed Fire Strategies for the residential, nursery, and community areas, and a Gateway 1 Form.
- 23.3** The Fire Statement outlines that the residential areas will follow a 'stay put' evacuation strategy, while the Community Hub and nursery will have simultaneous evacuation plans. All residential flats will be equipped with Grade D1 LD1 fire detection and BS 9251 sprinklers. Travel distances within single-level flats will not exceed 20 meters to the entrance door. Multi-storey maisonettes will have ground-level exits and escape windows from first-floor bedrooms.
- 23.4** Each residential block will have at least two cores, except for Block G, which has a single core. All residential cores will be constructed as firefighting shafts with firefighting lifts, stairs, and dry risers. Dry riser inlets will be accessible within 18 meters of fire service parking.
- 23.5** The Community Hub will have escape travel distances within the limits set by fire safety standards. Ground floor exits will lead directly to safety, while the second floor will have a protected stair with an occupancy limit of 60

people. The central stair serving the first and second floors will have a 300-person capacity, sufficient for all occupants.

- 23.6** The Nursery will also adopt a simultaneous evacuation strategy, with direct escape routes from most ground floor rooms and two protected stairs from the first floor leading to ground-level exits.
- 23.7** The statement submitted concludes that the proposed fire safety measures meet the highest standards and comply with London Plan policies D12 and D5(B5).
- 23.8** Accordingly, it is considered that the proposal accords with the London Plan and Policy D12 of the Local Plan in respect of safety and resilience to emergencies.
- 23.9** Subject to the inclusion of a condition requiring an updated Fire Strategy officers consider that the Proposed Development accords with the London Plan and Policy D12 of the Local Plan in respect of safety and resilience to emergencies.
- 24.0** **DESIGNING OUT CRIME**
- 24.1** **Local Plan Policy DC2** requires developments to be designed in line with the principles of Secured by Design.
- 24.2** A Secure by Design officer has been involved in the development of the design, through workshops. Their input has helped to develop the access strategy and courtyard lighting proposals, in particular. The Design and Access Statement sets out how the scheme is designed with safety and crime prevention in mind.
- 24.3** Subject to the inclusion of a condition requiring Secure by Design accreditation, officers consider that the Proposed Development accords with the London Plan and Policy D12 of the Local Plan in respect of safety and resilience to emergencies.

25.0 DEVELOPMENT BENEFITS / SOCIAL VALUE

25.1 The applicant would be required to work with the borough and local training, employment, and education agencies to maximise local take up of these positions during the construction phase of the development. The Local Planning Authority will also seek to secure that 10% of the construction costs will be offered as local procurement contracts and are secured for the local economy.

25.2 The proposals would offer a range of significant planning benefits for the wider community, including:

- a) The optimisation of a highly accessible and sustainable brownfield site which is at present underutilised. The Proposed Development would make better and effective use of brownfield land to deliver a community centre plus nursery and create homes that would directly support the economic growth and competitiveness of the capital and support the regeneration of inner London generally. In doing so it can unlock social benefits and enable opportunities for environmental improvements.
- b) The Proposed Development would make better and effective use of brownfield land to create homes that would directly support the economic growth and competitiveness of the capital and support the regeneration of inner London generally. In doing so it can unlock social benefits and enable opportunities for environmental improvements
- c) The opportunity to deliver new housing, including a substantial number (50%) of affordable homes. This will be a meaningful contribution towards the Borough's housing need and housing choice. The delivery of 253 high quality new homes, 127 of which would be delivered as affordable units.
- d) Provision of a new highly sustainable, energy efficient and accessible nursery and community centre which achieves BREEAM Excellent rating and provides new teaching, play and educational facilities including an on-site forest school.
- e) Rented homes provided at the most affordable rents for tenants (i.e. Social Target Rent)
- f) Nursery facilities (the playground at ground floor, the main hall and the art/design technology and food technology classrooms to be made available for community use out of school hours) retaining and increasing current community use of the site.
- g) Provision of a high-quality new Community Hub.
- h) New play facilities that are accessible to the wider community, including a new Adventure Playground.
- i) A significant amount of new open space, with a net uplift in public open space including planting of 215 new trees (with a reprovion ratio of 2:1).
- j) An appropriate townscape response to the Site and surrounding area, considering the requirement to provide much needed market and affordable homes.

- k) A development that seeks to support sustainable environmental objectives through taking steps to achieve reductions in energy consumption, carbon, water usage and waste production. A 59% reduction in Carbon emissions across the development, constituting and very substantial annual decrease of CO₂ in the atmosphere. The nursery and community centre will achieve BREEAM Excellent.
- l) The Proposed Development provides an opportunity for multiple economic and employment benefits to Hammersmith and Fulham not only during the construction process, but also in the future through the provision of homes and contributions to the community.
- m) A contribution towards the provision of local infrastructure through CIL.

26.0 COMMUNITY INFRASTRUCTURE LEVY (CIL)

Mayoral / Borough CIL

- 26.1** Mayoral CIL (Community Infrastructure Levy) came into effect in April 2012 and is a material consideration to which regard must be had when determining this planning application. Under the London wide Mayoral CIL, the scheme would be liable for a CIL payment. The GLA expect the Council, as the Collecting Authority, to secure the levy in accordance with London Plan Policy DF1.
- 26.2** The Council has also set a Borough CIL charge levied on the net increase in floorspace arising from development to fund infrastructure that is needed to support development. The Borough CIL Charging Schedule was presented to Council and approved 20 May and has formally taken effect since the 1 September 2015.
- 26.3** This development is liable for London-wide community infrastructure levy (Mayoral CIL2) and Borough CIL but qualifies for Social Housing Relief.

27.0 EQUALITY IMPACT

- 27.1** An Equality Impact Assessment ("the Assessment") was submitted with the application. The Assessment deals with the development during construction and once completed. Public authorities when exercising their functions are obliged by the Equality Act 2010 to have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited under the 2010 Act, to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it, and to foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 27.2** The Assessment states that there will be some potential negative impacts during construction on older people, the disabled, children and young people and mothers with young babies, from temporary closure of some footpaths and pavements and other works related barriers, air pollution, noise, loss of the community buildings, unsecured building works, temporary loss of play

space and impact of noisy works on school pupils' revision. A further potential negative impact is inappropriate behaviour by workers on the Site towards women passers-by.

- 27.3** However, mitigation of these impacts is possible and if the mitigation is put in place, what would otherwise be negative impacts on these groups will be neutral. Mitigation includes alternative footpath routes, control of noise, vibration and air pollution during construction, provision of the temporary community building, ensuring the construction site is secure, enhancement of the play spaces close to the Site and requiring contractors to report unacceptable conduct of employees on the Site.
- 27.4** Also, the construction phase is anticipated to have a positive impact on younger people and unemployed residents, because they will have access to apprenticeships, employment and training opportunities.
- 27.5** The completed development will have positive impacts for people with protected characteristics. The new community hub will be positive for all protected characteristic groups. The residential development will also be positive, providing new homes (including a substantial proportion of affordable housing) which will be larger and more accessible than existing homes on the estate, with blue badge parking spaces, good lighting and inclusive design of the public realm as well as the dwellings, as well as other specific improvements of benefit to older and disabled people. The day nursery, and play areas, equipment and strategy will be positive for children and young people, including disabled children and young people.
- 27.6** The Assessment identifies a potential negative impact on older people who suffer from age related impairments by reason of the altered built environment, but states that this can be mitigated by adequate signage and use of suitable surfacing material.
- 27.7** In conclusion, it is considered that any potential negative impacts can be neutralised by appropriate mitigation and that the overall impact on persons with protected characteristics will be positive.

28.0 MEMORANDUM OF UNDERSTANDING AND CONDITIONS; THE COUNCIL AS APPLICANT AND DEVELOPER

- 28.1** The Council is both the landowner and Applicant, and it is proposed that the Council will build out the development.
- 28.2** It is lawful for the Council to grant planning permission in those circumstances, and to attach conditions to such a planning permission.
- 28.3** However, it is not legally possible for the Council as landowner to enter into a unilateral obligation or agreement under section 106 of the Town and Country Planning Act. The reason for this is that the Council as Local Planning Authority cannot enforce a planning obligation against the Council as landowner. That is because although these are two different Council

functions, the Council is a single entity in law. A person cannot realistically be said to enforce legal obligations against themselves.

- 28.4** It is therefore proposed that matters which would otherwise be dealt with in a section 106 obligation will be set out in a Memorandum of Understanding, containing undertakings from the Council. The Memorandum will be at substantially the same level of detail as a section 106 obligation and the proposal to enter into a Memorandum of Understanding is a material consideration for the determination of this planning application.
- 28.5** Failure by the Council to honour the undertakings in the Memorandum of Understanding (or to comply with the conditions) may constitute maladministration, and a decision not to comply with them could potentially be the subject of an application for judicial review on the grounds of failure to take account of material considerations, taking account of irrelevant considerations or acting so unreasonably that no reasonable Council could act in that way.
- 28.6** Also, the conditions would be legally enforceable under the Town and Country Planning Act by the Council against any person to whom the Site or the development is disposed of, whether in whole or part, and the Council has undertaken that if it disposes of the whole or part of the Site or development (other than individual dwellings) it will require a section 106 obligation from the buyer containing the same undertakings (or their substance) as will be contained in the Memorandum.
- 28.7** A summary of the matters to be dealt with in the proposed Memorandum of Understanding is set out below.

A. Affordable Housing

B. Wheelchair Units

C. Employment, Training and Local Procurement Strategy

- a. A financial contribution of £335,478 to support delivery of the Council's Industrial Strategy "Upstream London", including to support employment, skills and local procurement activities.
- b. At least 10% of the total number of people employed on the construction of the development are local (H&F) residents, including: (i) 30 apprenticeships and (ii) 12 paid work experience placements.
- c. 12 unpaid work experience placements for local (H&F) residents and students of local (H&F) schools.
- d. Local (H&F) businesses are procured in the supply chain of the construction of the development to a value of at least 10% of the build cost
- e. None of these contributions are double counted with any social value contributions committed by a procured developer as part of the procurement process

- f. Evidence of any of these outputs should be reported to the LPA on a quarterly basis.

D. Car Parking Permits

E. Open space and play space

F. Offsite Biodiversity enhancements and/or purchase biodiversity credits to achieve 10% BNG

G. Energy and Sustainability

- a. Carbon Offset Payment (Est. £290,686 calculated at GLA's £95/tonne for carbon offset payments)

H. S278 Highways Agreement / Highways improvement works

I. Monitoring Allocations The Council will undertake to allocate the following sums for monitoring:

- 1) Air Quality Dust Management Plan Compliance: £30,000 allocated every 12 months from the Commencement of Development (including Demolition Works) for the purpose of reviewing and monitoring the demolition and Construction site AQDMP compliance plan during the demolition and construction phases of the development.
- 2) Construction Logistics Plan: £5,000 per year of construction (and demolition) works, for the purposes of reviewing and monitoring the Demolition Logistics Plan, Demolition Management Plan, Construction Logistics Plan and Construction Management. Monitoring to include reference to a Community Liaison Group Meeting, to be held with residents/occupiers prior to commencement of development, and at regular intervals, to ensure that they are aware of the impacts and have had the opportunity to input into the CLP.
- 3) Construction Workforce Travel Plan: £5,000 allocated every 12 months from the anniversary of commencement of development).
- 4) Residential Travel Plan: £5,000 allocated at review years 1, 3 and 5) from first occupation of this part of the development.
- 5) Nursery Travel Plan: £5,000 allocated at review years 1, 3 and 5) from first occupation of this part of the development.
- 6) Community Centre Travel Plan: £5,000 allocated at review years 1, 3 and 5) from first occupation of this part of the development.
- 7) Carbon Dioxide Emissions Offset allocation of £298,610 and any subsequent uplift subject to a revised Sustainability Statement and Energy Statement secured by Conditions 27 and 28. Development to be capable of connecting into a District Energy Network.

J. Local Planning Authority's Legal Costs - Payment of the reasonable legal and other professional costs incurred in preparing the Memorandum of Understanding.

29.0 CONCLUSION AND RECOMMENDATION

- 29.1** The proposal involves the comprehensive redevelopment of the site, including the demolition of existing buildings and construction of 8 new buildings (1-6 storeys) to provide 253 homes, with 50% affordable housing. It also includes a new children's nursery, community centre, landscaped open space, an all-weather games pitch, and outdoor play facilities.
- 29.2** The site is part of a designated growth and regeneration area (White City Opportunity Area and Regeneration Area). The design optimizes land use and is informed by extensive community engagement, which included co-production sessions, exhibitions, and meetings with local stakeholders. The project responds to the local context and aims to deliver a high-quality development in line with the objectives of the Council.
- 29.3** The development will increase publicly accessible open space by 47%, incorporating child play features, SuDS features (rain gardens, swales, permeable paving), and ecological enhancements (new trees and planting). It will retain existing Category A trees and plant 215 new trees to replace any removed.
- 29.4** The scheme incorporates localised energy centres, active/passive design measures, ASHP, and PV to reduce CO2 emissions by 59% compared to building regulations. The nursery and community hub are designed to achieve a BREEAM 'Excellent' rating.
- 29.5** The proposal represents a significant regeneration opportunity, delivering much-needed housing, community facilities, and a high-quality, sustainable development. It aligns with national, regional, and local planning policies and best practices, considered as a whole.
- 29.6** This application has been assessed in terms of potential environmental impacts and having regard to design / amenity related impacts and the proposed changes to the detailed component of the scheme, the application is acceptable in all respects.
- 29.7** The height, scale and massing of the proposed built form is appropriate and provides a satisfactory design response to the site and surrounding townscape, delivering an appropriate level of density with regard to its location and the size of the site. The architectural character of the scheme is considered to represent a high-quality of design.
- 29.8** The application has been assessed against all relevant planning policies in the Development Plan including the Local Plan 2018 and London Plan 2021 and against the guidance set out in the National Planning Policy Framework 2024. The Proposed Development does not accord with the provisions of Policy OS2 (Access to Parks and Open Spaces) of the Local Plan which seeks to resist development on public open space of borough-wide importance as identified in the Council's Open Space Hierarchy as OS30 White City Community Garden, unless it can be demonstrated that such

development will not harm its open character, and its function as a sport, leisure or recreational resource, and its contribution to biodiversity and visual amenity. The Proposed Development will reduce the open space in OS30 by 2,352 sqm (40.7%), which is contrary to Local Plan Policy OS2, as it impacts the open character of the space. However, this policy conflict is considered to be outweighed by the mitigating factors and public benefits the development will bring including the increase in publicly accessible open space. The development is considered to comply with the Development Plan, taken as a whole, and any conflict with the Development Plan is outweighed by the substantial benefits of the Proposed Development.

- 29.9** Officers support the Proposed Development in line with the recommendations at the start of the report.