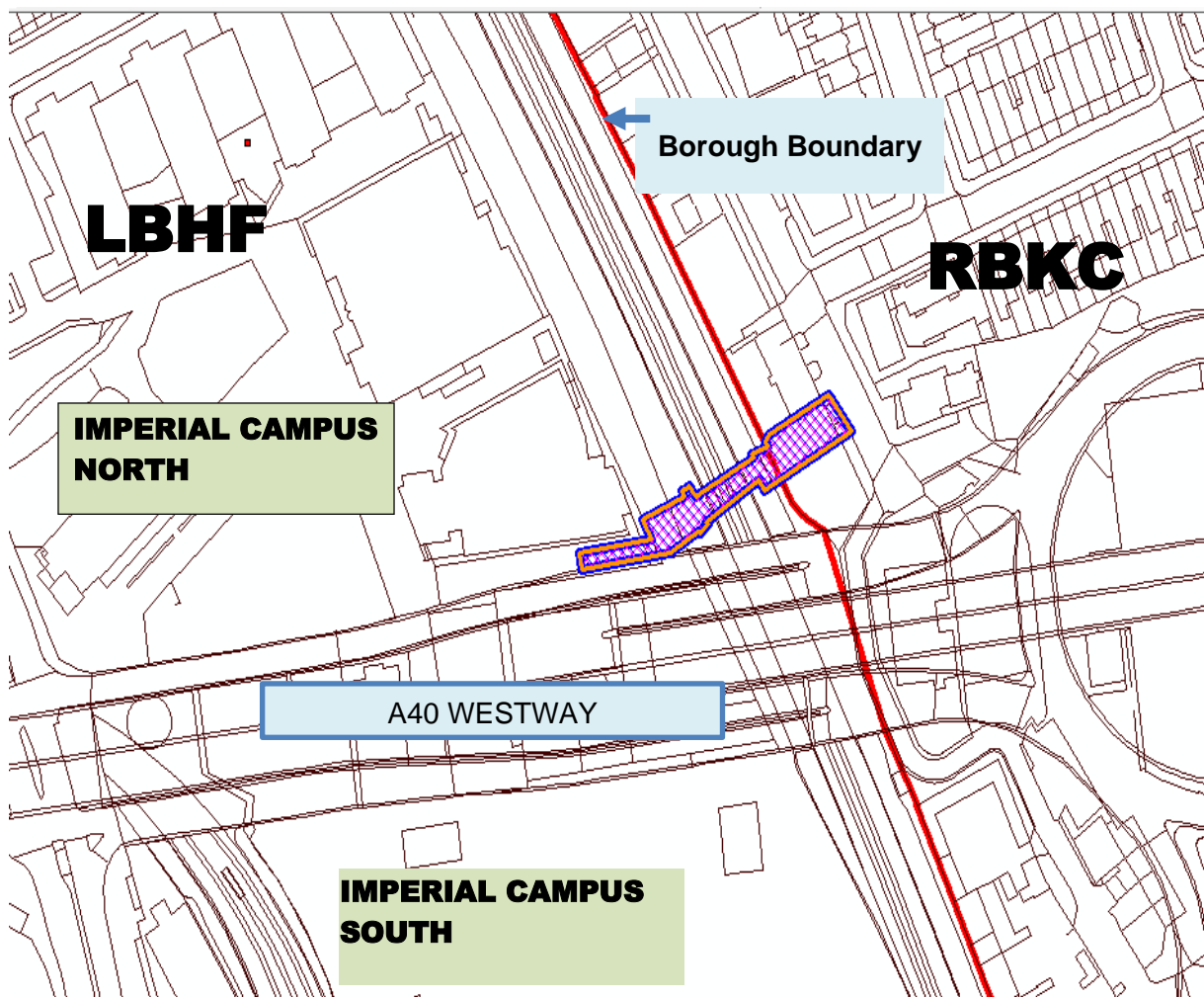

Ward:

College Park and Old Oak

Site Address:

Land to the north of the A40 (the Westway) adjacent to the Translation and Innovation Hub (I-Hub), 84 Wood Lane, London W12 0BZ.



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FOR IDENTIFICATION PURPOSES ONLY - DO NOT SCALE.

Reg. No:

2025/00389/FUL

Case Officer:

Jesenska Oezdalga

Date Valid:

05.02.2025

Conservation Area:

N/A

Committee:

10.06.2025

Applicant:

Imperial College Thinkspace Ltd
(c/o Agent)

Description:

Construction of a new publicly accessible underpass for pedestrians and cyclists between Imperial White City Campus and Latimer Road.

Drg. Nos: See Condition 2

Application Type:

Full Planning Permission

OFFICER RECOMMENDATION:

- (1) That the Committee resolve that the Director of Planning and Property be authorised to grant planning permission upon the completion of a satisfactory legal agreement and subject to the conditions listed below.
- (2) That the Committee resolve that the Director of Planning and Property, after consultation with the Assistant Director of Legal Services and the Chair of the Planning and Development Control Committee be authorised to make any minor changes to the proposed Heads of Terms of the legal agreement or proposed conditions, which may include the variation, addition or deletion of conditions, any such changes shall be within their discretion.

CONDITIONS

1. Time Limit

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).

2. Approved Drawings

The development hereby permitted shall be carried out in complete accordance with the following approved drawings:

WCEX1901 STA ZZ ZZ DR H 0001 P01
WCEX1901 WT8 LA ZZ DR L 0001A P03
WCEX1901 WT8 LA ZZ DR L 00002 P04
WCEX1901 WT8 LA ZZ DR L 00003 P03
WCEX1901 WT8 LA ZZ DR L 00004 P04
WCEX1901 WT8 LA ZZ DR L 00005 P04

Reason: To ensure full compliance with the planning application hereby approved and to prevent harm arising through deviations from the approved plans arising through deviations from the approved plans, in accordance with Policies DC1 and DC2 of the Local Plan (2018).

3. TFL Asset Protection Agreement (APA)

Prior to commencement of the development hereby permitted, an Asset Protection Agreement (APA) shall be entered into with Transport for London (TfL), as required by TfL. The Asset Protection Agreement is required to ensure the development is constructed in such a manner that the safety and/or operation and/or structural integrity of the relevant TfL Assets shall not be threatened or prejudiced in anyway. A copy of the completed Asset Protection Agreement for the development shall be submitted to the Local Planning Authority and shall be fully maintained during the construction works of the development.

Reason: To ensure that the development does not impact on existing Transport for London infrastructure, in accordance with Policy T3 of the London Plan (2021).

4. Hoardings

Prior to commencement of the development hereby permitted, a scheme for the erection of a temporary fencing (minimum height 2.5 metres), around the perimeter of the site with the railway embankment, shall be submitted to and approved in writing by the Local Planning Authority. The temporary fencing shall be installed in accordance with BS 5975-2:2024 prior to the start of any construction works and thereafter be retained for the duration of the works in accordance with the approved details. No part of the temporary fencing 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, and to ensure the development's air pollution impacts are mitigated in accordance with the requirements of Policies DC1, DC2, DC8, CC10 and CC12 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

5. Construction Management Plan

Prior to the commencement of the development hereby approved, a Construction Management Plan (CMP) shall be submitted to and approved in writing by the Local Planning Authority. Details shall include control measures for dust, noise, vibration, lighting, delivery locations, waste classification and disposal procedures/locations; location of site offices, ancillary buildings etc.; hours of working including advance notice of exceptional hours of work where appropriated; advance notification to neighbours, and other interested parties of the proposed works and public display of contact details including accessible phone contact to persons responsible for the site works, 24 hours daily for the duration of the works. The development shall be carried out in accordance with

the Construction Management Plan. Additionally, the site or Contractor must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being undertaken.

Reason: To ensure that the amenity of occupiers of surrounding premises is not adversely affected by noise, vibration, dust, lighting or other emissions from the building site, in accordance with Policies CC11, CC12 and CC13 of Local Plan (2018).

6. Construction Logistics Plan

Prior to the commencement of the development hereby permitted, a Construction Logistics Plan (CLP) prepared in accordance with TfL CLP Guidance, shall be submitted to and approved in writing by the Local Planning Authority. The CLP shall cover the following minimum requirements:

- a) Community engagement and liaison to be carried out 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, retained and maintained throughout the construction 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).

7. Air Quality Emissions Control and Dust Management Plan (Construction)

Prior to the commencement of the of the development hereby permitted, details of Air Quality Emissions Control including Nitrogen Oxides (Nox), Particulates (PM₁₀, PM_{2.5}) emission control of Non-Road Mobile Machinery (NRMM), On Road Vehicles and fugitive dust emissions to mitigate air pollution shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall include:

- a) Details of the Non-Road Mobile Machinery (NRMM) used on the site with CESAR Emissions Compliance Verification (ECV) identification that shall comply with the minimum Stage V NO_x and PM₁₀ emission criteria of The Non-Road Mobile Machinery (Type-Approval and Emission of Gaseous and Particulate Pollutants) Regulations 2018 and its subsequent amendments. This will apply to both variable and constant speed engines for both NO_x and PM. An inventory of all NRMM for the first phase of construction shall be registered on the London City Hall NRMM register [GLA-NRMM-Register](#) prior to commencement of construction works and thereafter retained and maintained until occupation of the development.
- b) Details of the use of on-road London Ultra Low Emission Zone (ULEZ) compliant vehicles from on-site contractors and suppliers of services and materials to the site e.g., minimum Petrol/Diesel Euro 6 and Euro VI.
- c) Details of installation of solid timber hoarding (minimum height of 2.5m) in accordance with BS5975-2:2024 including photographic confirmation of installed solid timber hoarding around the perimeter of the site on all site boundaries.

Developers must ensure that on-site contractors follow best practicable means to minimise dust, particulates (PM₁₀, PM_{2.5}) and NO_x emissions at all times in compliance with Mayor of London 'The Control of Dust and Emissions during Construction and Demolition', SPG, July 2014. Approved details shall be fully implemented and permanently retained and maintained during the construction of the 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).

8. Materials and Public Art

Prior to the commencement of the relevant works of the development hereby approved, particulars and samples (where appropriate) of all the materials to be used including details of the ceramic tiles and retaining walls within the underpass and externally, including details of boundary treatments and street furniture, alongside provision of details of any public art to be installed within the structure, shall be submitted to, and approved in writing by the Local Planning Authority, in consultation with Transport for London (TfL). The development shall be completed in full accordance with the approved details and shall thereafter be retained permanently in that form.

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

9. Wayfinding

Prior to practical completion of the development hereby approved, 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 via the White City Imperial Campus; to improve connectivity to White City Underground Station, Wood Lane Underground Station and White City Bus Station; and clarify how the wayfinding signage will be delivered. Part of the strategy shall include provision of additional signage to assist in ensuring of inclusive access. The approved wayfinding signage shall be provided prior to the first use of the development in accordance with the approved details permitted and shall be permanently retained thereafter.

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).

10. Soft and Hard Landscaping Details (Design)

Prior to commencement of the development hereby approved, details of the proposed soft and hard landscaping of all external and internal to the underpass shall be submitted to and approved in writing by the Local Planning Authority. The details shall include, where relevant: planting schedules and details of the species, height and maturity of any trees and shrubs, including sections through the planting areas; depth of tree pits, containers and shrub beds; details relating to the access of the underpass, pedestrian surfaces, materials, kerb details, external seating, street furniture, bins and lighting columns that ensure a safe and convenient environment for blind and partially sighted people. The landscaping works shall be carried out in accordance with the approved details and shall thereafter be permanently retained in this form.

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) and Policies DC1, DC8, OS2 and OS5 of the Local Plan (2018).

11. Planting – Replacement

Any trees, shrubs or planting pursuant to the soft landscape details that is removed, or seriously damaged, dying or diseased within five years of the date of planting shall be replaced in the next planting season with a similar size and species to that originally required to be planted.

Reason: To ensure that the development provides an attractive natural and visual environment in accordance with Policies DC1, DC8, OS2, OS4 and OS5 of the Local Plan (2018).

12. Lighting

Prior to first use of the development hereby approved, details of any proposed external artificial lighting, including lighting within the underpass and security lights shall be submitted to and approved in writing by the Local Planning Authority and no use 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'. The relevant Structure shall not be used 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 nearby residential properties and natural habitat is not adversely affected by lighting and to ensure a satisfactory external appearance, and to prevent harm to the street scene and public realm 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 the Council's Planning Guidance Supplementary Planning Document.

13. Flood Risk and Drainage

The development hereby permitted shall be carried out in accordance with the measures contained within the approved Flood Risk Assessment and Drainage Strategy (Rev P03) prepared by Curtins and dated 22 November 2024. No part of the development shall be used until all flood prevention and mitigation measures have been installed in accordance with the submitted details and the development shall be permanently retained in this form and maintained as necessary thereafter.

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

14. Inclusive Access

Prior to the first use of the development hereby approved, an Inclusive Access Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall include details of resting points for wheelchair users at intervals along the route and at the entry points to the underpass. The underpass shall not be used until measures have been installed in accordance with the approved details and shall thereafter be permanently retained in this form.

Reason: To ensure the proposal provides a fully inclusive and accessible environment in accordance with Policy D5 of the London Plan (2021) and Policies DC1 and DC2 of the Local Plan (2018).

RECOMMENDED REASONS FOR APPROVAL

- 1) Principle of development:** The principle of the construction of the East-West (EW) Link is secured by a S106 obligation attached to the original hybrid permission, granted December 2012 (ref. 2011/04016/COMB) and detailed permission for Buildings A and G (ref: 2018/01234/FUL). The proposed development would enable significant improvements to the east west pedestrian

and cycling connectivity/accessibility and permeability of the area, allowing access to a wide range of services, facilities, and transportation infrastructure. The underpass would reduce journey times and promote active travel. The proposal is therefore supported subject to the satisfaction of other development plan policies and is in accordance with Policies WCRA, WCRA1, DC1, DC2, and T3 of the Local Plan (2018).

- 2) **Design and Heritage:** The proposed scheme represents an opportunity to complement the regeneration of White City through the provision of additional permeability and pedestrian links. As the proposal is also considered acceptable and considered to be in line with national guidance in the NPPF as a whole and with strategic local policies relating to 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, and DC8 of the Local Plan (2018).
- 3) **Inclusive access:** The development will provide additional permeability and accessibility between White City and the surrounding environment: including provision of a useable pedestrian and cycle route. A condition would ensure the development provide accessible access for all users. The proposed development therefore complies with Local Plan Policies DC1 and DC2 of the Local Plan (2018).
- 4) **Transport and highways:** It is considered that the overall impact of the proposed development set out in the Transport Statement is acceptable. The development will allow for enhanced cycling and pedestrian connectivity between Latimer Road (RBKC) and Wood Lane (LBHF). A series of conditions and planning obligations will secure sufficient mitigation to ensure that the development is accessible and can operate without undue impacts upon the local highway network. The proposal therefore accords with Policies T1, T3, and T7 of the Local Plan (2018).
- 5) **Impact on residential amenity:** The proposed development is not considered to have an unacceptable impact upon the amenities and living conditions within surrounding properties in respect of daylight, sunlight, overshadowing, overlooking/privacy, noise, and vibration impacts. The proposed development is therefore considered to be acceptable in accordance with Policies CC10, CC11, CC12, CC13, and DC2 of the Local Plan (2018).
- 6) **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. The proposals are considered to be well designed and in accordance with the Policy D5 of the London Plan (2021) and Policy DC1 of the Local Plan (2018).
- 7) **Legal Agreement:** Planning obligations to offset the impact of the development and to make the development acceptable in planning terms are secured. The proposed development would therefore mitigate external impacts and would accord with Policy INFRA1 of the Local Plan (2018).

- 8) 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 had raised no objections.

LOCAL GOVERNMENT ACT 2000

LIST OF BACKGROUND PAPERS

All Background Papers held by case officer named above

Application received: 27 November 2024

Drawing Nos: As listed in Condition 2 above

Policy documents:

National Planning Policy Framework 2024

The London Plan 2021

LBHF - Local Plan 2018

LBHF - Planning Guidance Supplementary Planning Document 2018

Consultation Comments:

Comments from:

Transport For London

Crime Prevention Design Advisor – SW London office

EdCity Development Director, EdCity Walk, London W12

Queens Park Rangers Football Club

Transport For London – Spatial Planning

Transport For London – Spatial Planning

Date:

06.03.25

07.03.25

11.03.25

11.03.25

20.03.25

15.05.25

Neighbour Comments:

26 Shinfield Street W12

21.02.25

Gumball House, 303-315 Latimer Road W10

11.03.25

316-318 Latimer Road W10

11.03.25

64A Stroud Green Road N4

11.03.25

Flat 24 88 Wood Lane W12

13.03.25

3 Hereford Road W2

14.03.25

82 Wood Lane Molecular Sciences Research Hub W12

14.03.25

Flat 170 88 Wood Lane W12

16.03.25

No Address Given

17.03.25

82 Wood Lane W12

17.03.25

306 Latimer Road W10	19.03.25
6 Duke Street, St James' SW1Y	21.03.25
56A Eynham Road W12	23.03.25
22 Shinfield Street W12	07.04.25

OFFICER'S REPORT

1. BACKGROUND

- 1.1. This report relates to the submission of a full planning application for the construction of an East-West Link, also referred to as the 'underpass', beneath the West London Railway Line, between the London Borough of Hammersmith and Fulham ('LBHF') and the Royal Borough of Kensington and Chelsea ('RBKC'). The application concerns only the section of the East-West Link (including the underpass) to be provided on the LBHF side of the borough boundary. A separate application (ref: PP/24/08435) has been submitted for the access works associated with the RBKC side of the borough boundary.
- 1.2. The S106 legal agreement attached to the original hybrid permission, granted December 2012 (ref. 2011/04016/COMB) primarily related to the delivery of the Imperial White City Northern Campus. It required construction of an underpass from Imperial's White City Campus (LBHF) and Latimer Road (RBKC) before completing the remaining buildings on campus. The original permission has been varied multiple times during the building of the Northern Campus. More recently, the S106 requirement for the establishment of the underpass was secured in Section 73 with permission (ref. 2018/01256/VAR and detailed permission for Buildings A and G (ref: 2018/01234/FUL), also called the 'A and G Permission', approved 3 November 2022.
- 1.3. Schedule 1 of the Section 106 agreement to the 'A and G Permission' outlines the details of the underpass and requires the construction of the underpass prior to the practical completion of the last of the two remaining buildings on the Northern Campus. Building G was built in 2024 and is now the new School of Public Health. A resolution to grant planning permission for a student accommodation led scheme for Building A (ref. 2022/03492/FUL is pending a Stage 2 referral and final decision. The full planning history is outlined in section 3 of this report.
- 1.4. Full planning permission is sought for:

'Construction of a new publicly accessible underpass for pedestrians and cyclists between Imperial White City Campus and Latimer Road.'
- 1.5. The underpass would be constructed by Imperial Thinkspace Limited (ITL), a subsidiary owned by Imperial College. As the subway passes under a rail line, Network Rail requires a public body to take charge of the work if ITL fails to complete and maintain it.

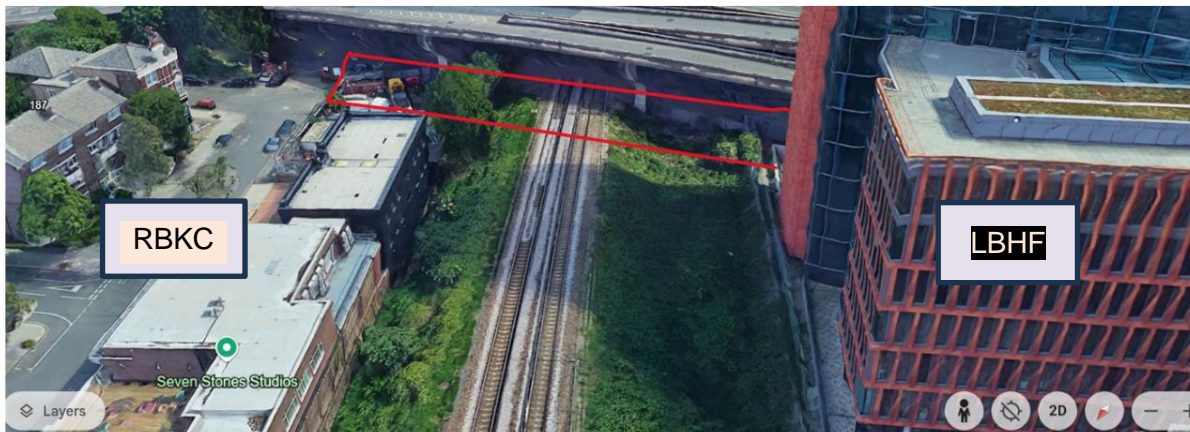
- 1.6. The East-West Link including the underpass is almost wholly in LBHF, and it is a longstanding Imperial College commitment that that is supported by the council and RBKC. The underpass is expected to be constructed and maintained at no cost to the Council and the agreements listed below (which are mainly in response to Network Rail requirements) are necessary in this context. These agreements sit outside the planning legislation but are required to be in place before construction commences on the underpass, and this will be reflected in the proposed s106 legal agreement.
- Tripartite agreement for the construction of the underpass (between Network Rail, Imperial Thinkspace Limited and the Council).
 - Permissive path agreement (between Network Rail, Imperial Thinkspace Limited and the Council), relating to the maintenance of the underpass.
 - Separate maintenance agreement (between Imperial Thinkspace Limited and the Council), so that the applicant can assume the maintenance obligations.

2. SITE AND SURROUNDINGS

- 2.1. The site is located on the Imperial College White City North Campus to the north of the A40 (the “Westway”), adjacent to the Translation and Innovation Hub (“I-Hub”). The proposed tunnel works beneath the West London Railway Line would connect the White City Campus North (LBHF) and the Latimer Road area (RBKC). The LBHF site measures 405 sqm in area. The RBKC site measures 332 sqm in area. The middle portion of the site comprises an existing railway (West London) line, with vegetated embankments on either side. The Central section located on the embankment is owned by Network Rail. The western portion, also located in LBHF, comprises a hardstanding area within the Imperial Campus.



IMPERIAL – UNDERPASS



Site and aerial view of proposed location of Underpass

- 2.2. The site is bound by Wood Lane to the west, the West London Railway line to the east, and the Imperial White City Campus developments to the north and south. The western corner of the site is located within the Imperial White City Campus North. The borough's boundary with RBKC extends along the eastern edge of the railway line embankment.
- 2.3. Land immediately to the north is formed by the development of Imperial's North Campus that has been substantially completed. The campus provides a wide range of research facilities, offices, post and undergraduate facilities, 192 residential units, retail/café/restaurant uses (ground level) and public realm. The campus is largely built out and occupied. Plot G (School of Public Health) was the last plot to be completed and is open and operational. Plot A is the final plot to be developed.
- 2.4. The elevated Westway (A40) bounds the site to the south. Existing pedestrian connections are available providing direct access to Campus North, under the A40 Westway into Campus South, or to continue through campus to connect to Wood Lane.
- 2.5. Further south, the former Dairy Crest currently accommodates temporary buildings as part of a new research and innovation district for Imperial College, known as Scale Space. This temporary development occupies part of this site until Imperial's White City Campus South masterplan is delivered. The southern masterplan was approved in 2021 (ref. 2018/00267/OUT). The campus will create a new research and innovation campus focused on science, medicine, engineering and business across c.200,000sqm of floorspace and include a hotel and residential uses, supported by new places to eat, drink and shop, including three acres of new public spaces. The first phase is being delivered via enabling/infrastructure works. A new bridge is being constructed across the Central Line to connect Wood Lane, and central public realm works. The new bridge will provide a new permanent access route for vehicles, cyclists, and pedestrians. The new bridge is set to open in the summer of 2025. Phase 1 works have also commenced for the delivery of Development Zone 1. This involves the erection of two small buildings under the Westway.

- 2.6. The RBKC side (nos. 18a, 299 and 301 Latimer Road) is located on the south-western side of Latimer Road. The land is boarded up and used for the temporary storage of vehicles secured by 2m tall metal fencing round the perimeter. The surrounding area comprises a mixture of 2 and 3 storey buildings including light industrial, office and residential uses. The Oxford Gardens Conservation Area and a sports centre are situated beyond.
- 2.7. The site is located within the White City Regeneration Area (WCRA) and designated in the White City Opportunity Area (WCOA) in the London Plan. The WCOA covers approximately 110 hectares at the eastern edge of the borough and along the boundary with the RBKC. The site is located within Strategic Site policy WCRA1 (White City East).
- 2.8. The site is not within a conservation area or accommodate any heritage assets. The site is within a Nature Conservation Area related to rail side habitats. Contains a designated green corridor which follows the West London Line along the eastern boundary. None of the existing trees on the Site are covered by a Tree Preservation Order (TPO). The site is located within Flood Zone 1 (low probability) and within a borough-wide designated Air Quality Management Area (AQMA).
- 2.9. The site currently has a Public Transport Accessibility Level (PTAL) of 6a, where 6b represents the highest level of public transport accessibility and 1 the lowest. The site is located within a short walking distance of two underground stations: White City (Central Line) and Wood Lane (Hammersmith and City Line). White City Underground Station is approximately 300m south of the site. There are several bus routes serving Wood Lane to the west. The site is within walking distance of Latimer Road Underground Station on the Circle and Hammersmith & City lines. Both sides of the proposal would be within a 20-minute walk of Shepherd's Bush Overground and Underground services.

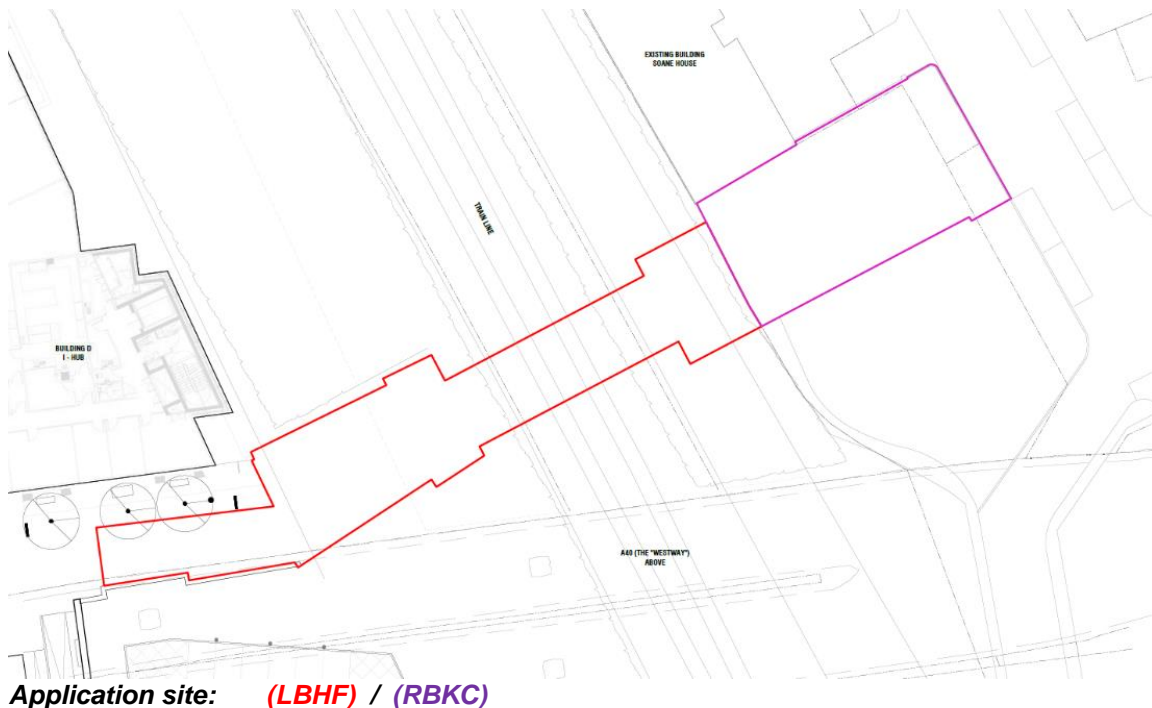
3. RELEVANT PLANNING HISTORY

- 3.1. The original outline planning permission for Imperial White City Campus North (ref: 2011/04016/COMB) was approved on 21 December 2012. The S106 agreement attached to this permission first established the principle of creating an East-West Link between Imperial and Latimer Road.
- 3.2. A subsequent Section 73 and a drop in planning applications associated with Plots A and G (ref: 2018/01234/FUL) was granted on the 3 November 2020 for two standalone buildings. The target date set to deliver the East-West Link in the Section 106 Agreement is based on practical completion of the last of Buildings A and G. Plot A is still to be delivered.
- 3.3. In 2014, and during the construction of the Northern Campus, two concurrent applications were submitted by Imperial to RBKC (ref: PP/14/06751) and LBHF (ref: 2014/04546/FUL) for the construction of an underpass beneath the West London Railway Line, linking Latimer Road with Imperial Campus on the opposite side of the railway. Neither application was determined, as it was considered the applications were submitted prematurely, with further information on the maintenance and security

of the East-West Link remaining outstanding. Since the 2014 submission, there have been ongoing discussions between Network Rail, Imperial College, RBKC and the Council about the design, construction and maintenance of the underpass. The design has been subject to a softer approach and includes current best practices for pedestrian and cyclist safety and closer alignment with the material and furnishings within the Imperial Campus.

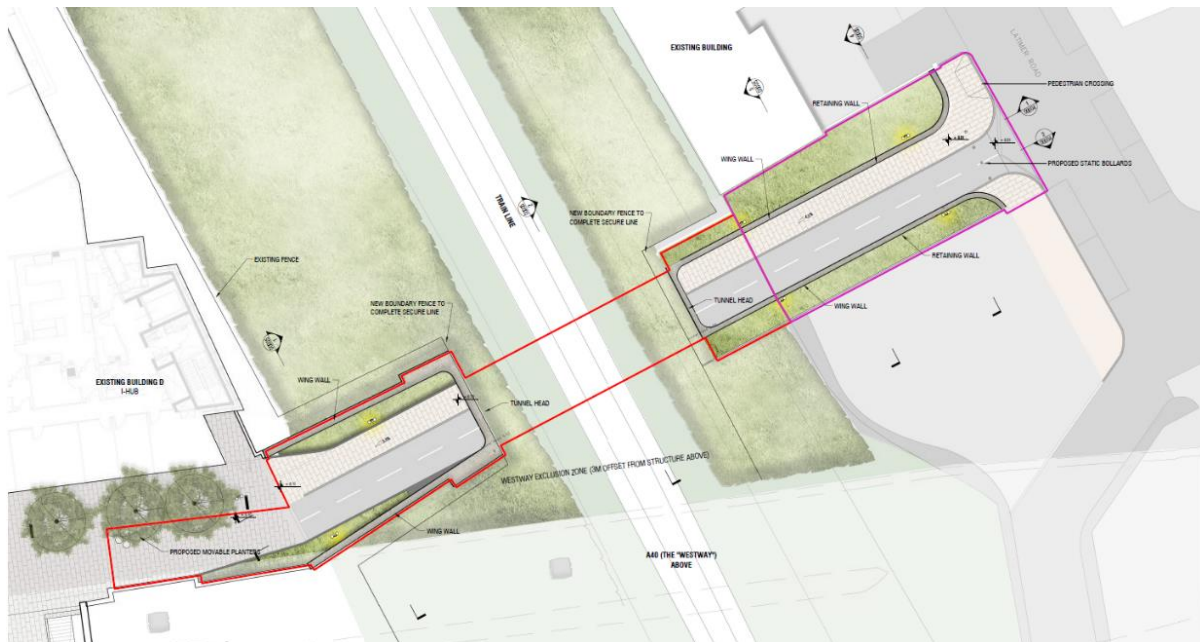
4. PROPOSAL

- 4.1. The application seeks planning permission for the part of the proposed underpass located within LBHF. This includes the western mouth of the underpass (entrance/exit) and the underpass itself. A parallel request was made to the RBKC for access and exit from Latimer Road (ref: PP/24/08435).



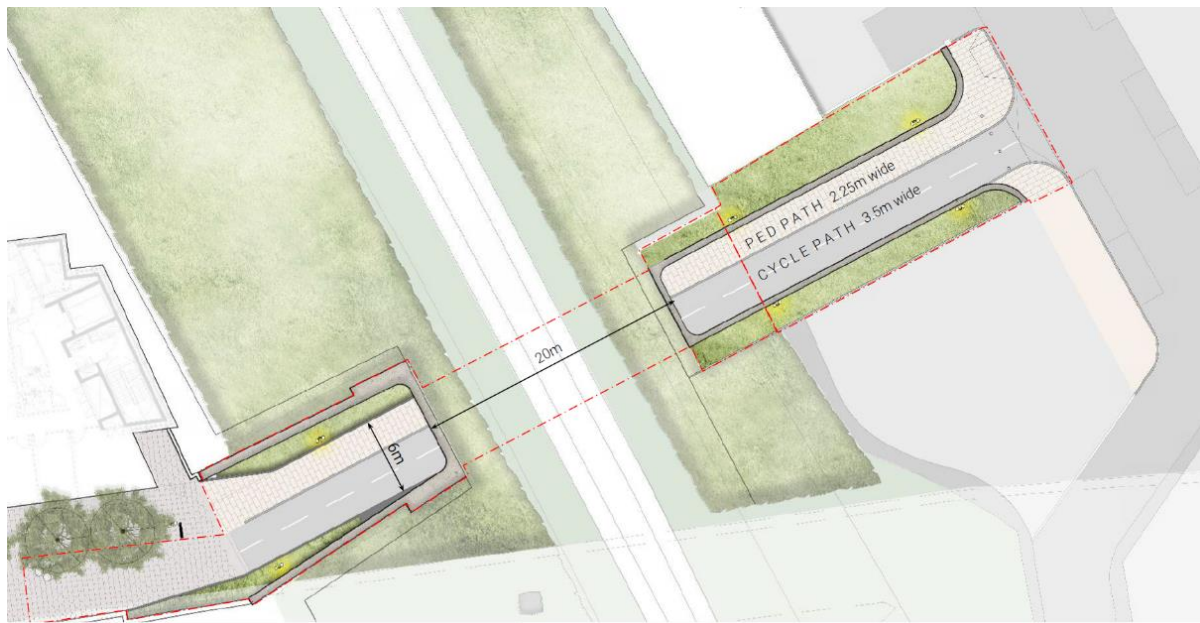
- 4.2. The original S106 agreement established the principle of creating an underpass between Imperial College and Latimer Road. The 2012 legal agreement was varied following amendments to the Northern Campus masterplan, but the commitment to deliver the underpass was kept.
- 4.3. The East-West Link is designed to enhance connectivity between Imperial's two White City campuses, surrounding amenities, and the wider community on both sides of the West London Line. The underpass is aimed at overcoming the existing barriers that currently impede pedestrian and cycle access in the area, and to serve residents and Imperial visitors. The underpass is intended to improve connectivity and safety, promote active travel and reduce neighbourhood segregation.
- 4.4. The proposed East-West Link would run perpendicular to the railway line (located north of the concrete columns supporting the A40 Westway) with the underpass extending beneath the railway lines. The underpass access would provide shared but divided space for pedestrians and cyclists. The underpass would be publicly

accessible and open to the public at all hours under normal circumstances. The underpass is expected to be closed only for maintenance and cleaning purposes and would not be gated.



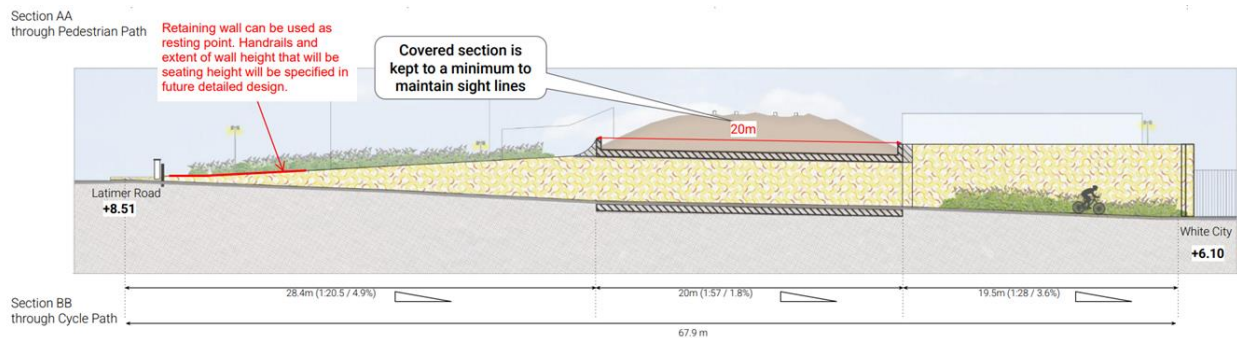
Aerial Plan – Underpass and approaches

- 4.5. The underpass would be 20m in length and 5.75m wide, providing a shared space for pedestrians and cyclists. The pedestrian path would be 2.25m wide. The cycle path is 3.5m wide. Both provide a width that will accommodate the anticipated volume of pedestrians and cyclists and enable separate travel in both directions. The underpass would have a consistent floor to ceiling height of 2.85m. This will provide pedestrians/cyclists with a clear, unobstructed path through the tunnel. Unobstructed splayed sight lines at the tunnel approach would provide visibility and safety.



Underpass: Length/width

- 4.6. As the West London Railway line is built on a raised embankment, the underpass will connect to the White City Campus and Latimer Road at ground level. Levels and gradients of the East-West link (68m long) are designed to be Disability Discrimination Act (1995) (DDA)-compliant. Gradients vary between 1:57 (within the underpass), 1:28 (access via LBHF), and 1:20.5 from Latimer Road.



Section: Underpass and approaches

- 4.7. Proposed excavation and construction works would involve the installation of temporary/permanent steel sheet piles, a reinforced concrete launch slab, a prefabricated reinforced concrete box culvert, reinforced concrete head walls and brick faced wingwalls on the east and west approaches together with services and landscaping works.
- 4.8. The East-West Link would utilise a material palette like the White City Campus and the existing public realm on Latimer Road. Yorkstone paving is designed for pedestrian path treatment on the RBKC side and underpass. Where the underpass meets the existing Imperial Campus, the Yorkstone paving would switch to match the existing Imperial paving treatment. The cycle path would be finished in standard tarmac, for textural contrast. The use of painted lines can be incorporated during the final design development. Tactile paving and stationary bollards, spaced 1.2m apart, are proposed at the intersection between the East-West Link and Latimer Road to slow down cyclists moving through the tunnel and prevent vehicles/mopeds from entering the underpass. Existing retractable bollards used for the existing delivery/servicing arrangements for the Imperial I-Hub building and movable planters would narrow the cycling path and encourage cyclists to slow down via the Imperial Campus.
- 4.9. Art, wayfinding and signage would be included to enhance the placemaking and contribute to the creation of a destination from either borough. Internally, the walls of the underpass would incorporate artwork, providing a pleasant visual experience for members of the public. The walls of the underpass would be tiled, ceramic mosaic design, and would reflect light. Final details will form part of Imperial's broader public art strategy, based upon 'Science for Humanity' and further details of this element would be sought through recommended conditions. The tiled surface would be easy to maintain. The underpass will be lit throughout and at all hours of the day to ensure a safe, safe, and inviting environment.
- 4.10. Landscaping will be integrated to match the White City North Campus and Development Zone 1 (White City South Campus), designed to slow down cyclists and

create a softer corridor between the North Campus and the upcoming DZ1 development under the Westway.

- 4.11. The proposed landscaping is designed to ensure a seamless environment with wider campus treatment. A green wall would frame the entrance and exit on the LBHF side and with the wider ecology/SINC rail corridor. A secure fence line would be maintained along the edge of the railway land. The proposed landscaping would be designed so not to impede the opportunity for natural surveillance and avoid the creation of hiding places. On the RBKC side, the proposal is for more colourful treatment. New mature trees would assist in reducing potential wind tunneling. Hedge planting and movable planters assist in softening the space and slowing cyclists.
- 4.12. The proposed underpass maximises natural light intake. Artificial lighting linked to the wider Imperial masterplan strategy is designed to enhance safety and reduce the risk of anti-social behaviour. Lighting fixtures outside the underpass would be installed in line with the existing Imperial White City Campus treatment. A lighting strategy for both applications would create uniformity, reducing the difference between light and dark patches and reducing light pollution or glare. Five CCTV cameras are proposed and would be positioned in the underpass, three of which will be vandal-resistant, surface-mounted cameras while two would be covert cameras fitted to the proposed light poles. The final details of the CCTV mounting fixtures and integration capabilities will be secured by the S106 agreement.
- 4.13. The application is supported by the following documents:
- Application Drawings, prepared by West 8
 - Planning Statement, prepared by DP9
 - Design Statement including outline lighting strategy, prepared by West 8
 - Transport Statement, prepared by Stantec
 - Flood Risk Assessment including drainage strategy, prepared by Curtins
 - Geo-Environmental Assessment, prepared by Curtins
 - Security Statement, prepared by Buro Happold
 - Consultation Logistics Plan, prepared by Sisk
 - Statement of Community Involvement, prepared by Concilio
 - Tree Survey, prepared by Canopy Consultant
 - Construction Traffic Management Plan Proforma, prepared by Meedhurst.

5. PUBLICITY & CONSULTATION

- 5.1. Notification letters sent to 360 properties. A site notice and a press advert were posted on 26 February 2025.
- 5.2. In total, sixteen representations were received from residents/businesses all in support of the proposal. The representations' content is summarised below.
- 5.3. Proposal is long overdue; will be hugely beneficial to the local neighbourhood; would benefit community facilities and amenities on both sides; enhance connectivity and provide communities with a new, more direct, safer, and more attractive pedestrian and cycle link; proposals will reduce commuting/travel times and provide a safer route for cyclists; a sustainable urban environment; opportunities to celebrate the

natural landscape; important link is well-lit, secure and maintained providing a safe and convenient route for both pedestrians and cyclists; welcome proposed planting and opportunity for new public art; proposals need to facilitate access for cargo bikes.

- 5.4 **Transport for London (TfL):** Commented on its capacity as the strategic transport authority and landowner of the A40 Westway. In terms of strategic transport, the proposal is supported, as it will enhance the linkage between the two boroughs and increase active travel opportunities. In landownership terms, this is subject to the Westway asset protection matters being resolved, and comments on underpass design and function being addressed. Subject to conditions or securing planning obligations through a s106 agreement, the application would be considered acceptable.
- 5.5. **Designing Out Crime:** Acknowledge pre-application consultation has taken place with the Applicant's design team prior to the submission. Satisfied with the Security measures outlined in the Security Statement of Intent and the Design Access Statement. Application reviewed by the Counter Terrorism Security Advisor (CTSA) and comments sent to RBKC about the entrance off Latimer Road. Hostile Vehicle Mitigation is sought to meet the existing curtilage and be based on agreed security Operational Requirements. PAS 68 bollards are proposed on the RBKC side installed to the London Cycling Scheme specification of 1.5m. CTSA preference is for PAS 69 standard HVM bollards to be installed at 1.2m.

Inclusive Design Review Panel

- 5.6. The proposal scheme was presented to the Inclusive Design Review Panel on 30 April 2025. The panel welcomed the design principles of the scheme, particularly there was support for how proposals would improve connectivity between White City and RBKC. The panel however noted a few issues which would warrant further consideration. Primarily concerns were raised regarding the distance / gradient of the ramped access either side of the underpass and how usable this would be for wheelchair users and people using walking aides. Additional concerns were raised as to how the shared spaces (between pedestrians and cyclists) would work in practice; alongside provision for signage to identify the gradients; use of appropriate material palettes for blind and visually impaired users; safety issues related to the scale and location of planters for wheelchair users; and ensuring appropriate luminance and lighting coverage and further engagement be undertaken to consider implications of Design for the Mind PAS particularly in relation to the public art strategy within the underpass.

Pre-application - Community Engagement

- 5.7. The Applicant has undertaken community and stakeholder engagement including discussion with community groups and residents surrounding the site. The applicant has provided a Statement of Community Involvement (SCI) that summarises the public consultation undertaken prior to the submission of the planning application. Concilio was appointed by the Applicant in March 2024 to perform the community consultation and manage pre-application consultation with neighbouring residents, occupiers, and interested stakeholders.

- 5.8. The following engagement was undertaken by the Applicant's project team:
- Dedicated consultation webpage (on Imperial website) – 3rd September 2024
 - Notification of the consultation event sent to key stakeholders' 4th–6th September 2024
 - 6,565 flyers delivered to residential and business properties around the site -9th September 2024
 - In-person drop-in public exhibition – 17/18 and 19 September 2024
 - Pop-up event at the I-Hub – 18 September 2024
- 5.9. The SCI states 198 people submitted comments for the East-West Link via the Imperial website and over 100 people attended the in-person consultation events and engaged with members of the project team. Key responses were safety and security, infrastructure and design, accessibility and connectivity, environmental considerations, timelines and delivery, public art and construction management. Overall, the feedback received was largely positive. The main concerns raised were safety and security, with queries about how pedestrian safety will be ensured and whether other safety measures will be implemented, including lighting and CCTV security.

6. POLICY CONTEXT

- 6.1. The Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011 are the principal statutory considerations for town planning in England.
- 6.2. Collectively the three Acts create a plan led system which requires local planning authorities to determine planning applications in accordance with an adopted statutory development plan unless there are material considerations which indicate otherwise (Section 38(6) of the 2004 Act as amended by the Localism Act).
- 6.3. The statutory development plan comprises the London Plan (2021); the Local Plan (2018) and the Planning Guidance Supplementary Planning Document (2018) (hereafter referred to as Planning Guidance SPD). Several strategic and local supplementary planning guidance and other documents are also material to the application's determination.

NPPF (2024)

- 6.4. The National Planning Policy Framework (NPPF) (2024) 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.

The London Plan (2021)

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

The Local Plan (2018)

- 6.6. The Council Local Plan was adopted on 28 February 2018. The policies in the Local Plan together with the London Plan make up the statutory development plan for the borough. The Planning Guidance Supplementary Planning Document (SPD) (February 2018) is a material consideration in determining planning applications.

7. PLANNING ASSESSMENT

- 7.1. The main considerations material for the assessment of this application have been summarised as follows:

- Principle of development
- Design
- Accessibility
- Highways and Transport
- Residential Amenity
- Fire Safety
- Security
- Other environmental considerations

8. Principle of Development

- 8.1. The principle of a pedestrian/cycle link between the two boroughs was established as an obligation in the original S106 agreement in 2012. The delivery of the underpass is a key aspiration for both boroughs and a long-term commitment to Imperial College London.
- 8.2. The proposed development would enable significant improvements to the East-West pedestrian and cycling connectivity/accessibility of the area, overcoming long-standing problems caused by the severance of the Westway and West London Railway Line. Provision of east-west (and north/south) pedestrian and cycling connections within the White City Regeneration Area is an important consideration to improve connections to existing communities.
- 8.3. Local Plan Strategic 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. Policy WCRA also refers to the provision of an east-west underpass to integrate and connect the White City Masterplan Area with its surrounding area, enhancing permeability. This is further supported by paragraph 5.21, which endorses the requirement of an underpass under the West London Line and secured as part of the Imperial College development, to improve pedestrian and cycling connectivity and support the Council's vision of ensuring a high proportion of trips undertaken on public transport, and by cycling and walking.
- 8.4. The proposed pedestrian/cycle link would improve permeability and significantly improve residents' access to a wide range of services, facilities, and transportation infrastructure. This underpass link would reduce journey times and promote active travel. The proposal would benefit the development of the remaining land within the

White City Regeneration Area and the wider regeneration experienced along Wood Lane. Providing a new cycle and pedestrian link that increases permeability and access across the boroughs is fully supported in policy terms.

- 8.5. The Applicant will be responsible for the construction of the underpass and will pay for the construction and maintenance costs. Network Rail will not accept Imperial College as the sole party responsible for the underpass structure under the West London Line and require the Council to take on this liability if the Applicant fails to complete the works or maintain the underpass, so to ensure safety of their railway. The tripartite agreement for the construction of the underpass will therefore require the Council to undertake the works if the Applicant fails to complete them. The Applicant will also take on the maintenance obligations, but the Council will be required to take over this responsibility, if necessary, as part of a maintenance agreement. Section 106 agreement also provides public access over the Imperial (North) site, which would allow access to the underpass. This access would not be dedicated as a public highway.
- 8.6. It is, therefore, clear that the proposals would accord Policies WCRA and WCRA1 of the Local Plan 2018. The proposal would also assist with achieving the regeneration aspirations for the Imperial campus and wider area and resulting significant public benefits in accordance with the Local Plan 2018

9. Design and Heritage

- 9.1. Strategic Policy WCRA (White City Regeneration Area) within the Local Plan requires development proposals to 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. 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. Local Plan Policy DC8 focuses on protecting and enhancing the borough's heritage assets, including listed buildings and conservation areas.
- 9.2. The existing site layout has a negative impact on the function and appearance of the area. The dead end formed by the existing railway embankment and the current back-of-house delivery arrangements to Imperial's I-Hub Building create an unfriendly and unwelcoming part of the wider campus. This perception is exacerbated by the provision of the Westway flyover structures. The proposed approach of the underpass and its associated works including the provision of additional lighting would provide a welcome improvement to this route. The accessible pedestrian/cycle routes would complete approaches from the north, south and west, connecting the East-West Link with both the North and South Campus of Imperial and the wider White City area. This intersection will soon be activated with the completion of the South's Development Zone 1 (DZ1) as two small buildings and outdoor seating.

- 9.3. The underpass has a simple and effective design. Proposed paving and materials are similar to the palette of materials used elsewhere across the campus.. A dark grey tone path would represent a shared space area, while a lighter tone representing a 'comfort zone' would also be located around building perimeters and entrances. The underpass walls would be clad in ceramic mosaic tiles to provide a high finish standard, suitably robust, and easy to maintain. The lamp columns are identical to those granted on the Imperial West Campus. This would ensure consistency on both sides and serve to highlight the underpass as an integral component of the Imperial campuses.
- 9.4. Since 2014, the design of the underpass has progressed on the basis that the East-West link will be as open as possible (with the minimum covered section), and that users would have visibility through the full route. Visibility and sight lines would be provided through the underpass. The proposal would include an underpass with the inclusion of pedestrian paving, a clear bike lane, integrated lighting and the potential for wall art thus providing a strong sense of place whilst maintaining the character connection to the surrounding area. The design will improve the entrance to the Imperial White City North and South Campus, which will improve this unused area.
- 9.5. The proposed development's design will deliver high-quality architecture combined with a safe and welcoming public realm that ensures it positively impacts the appearance of the street scene and surrounding area.
- 9.6. Schedule Paragraph 1.1 states that 'the underpass shall be constructed in accordance with a specification to be agreed between the Owner, the Council and Network Rail'. It is therefore expected that final details will be agreed by condition, as part of the ongoing detailed design process.
- 9.7. The proposals would not result in any harmful impacts to surrounding heritage assets or their setting and complement the character of the Imperial campus. In compliance with Local Plan Policies DC1 and DC2, 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 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 Local Plan Policies, WCRA, DC1, DC2 and DC8. Officers conclude that the proposal complies with Local Plan policies WCRA, DC1 and DC8.

10. Accessibility

- 10.1. London Plan Policy D5 seeks to ensure developments achieve the highest standards of accessible inclusive design.
- 10.2. Policy DC2 of the Local Plan states that new build development must be designed to respect the principles of accessible and inclusive design. Policy T3 of the Local Plan focuses on increasing opportunities for cycling and walking and enabling all residents to make better travel choices. The development should be inclusive and safe for all pedestrians.

- 10.3. The proposal seeks to provide inclusive, step-free development and increase pedestrian and cycle accessibility where feasible. This will in turn improve the opportunity for sustainable modes of transport and provide access to a greater number of facilities such as leisure and retail, whilst also providing access to a greater number of public transport connections east and west of the railroad line. The Applicant has engaged an inclusive consultant to inform on the design of the proposal to ensure the East/West link can be entered, used and exited with ease by all.
- 10.4. Despite the underpass design being heavily constrained by the restrictions arising from the existing embankment and rail line, the internal height and all proposed gradients meet or exceed minimum requirements. There would be a 2.5m fall between Latimer Road and White City Imperial across a length of 68m. A gradient of 1:20.5 is acceptable and would be shallow enough to ensure ease of use, including for individuals with disabilities. Information regarding the gradient levels in the East-West link would be incorporated into the wider wayfinding strategy.
- 10.5. The 6m width would provide sufficient space to accommodate both pedestrians and cyclists and would be suitable for all users including wheelchair users, mobility scooter users and users with prams to pass each other in opposite directions. Conflict between cyclists and pedestrians would be reduced by the provision of a two-tone surface treatment and clear signage. In response to comments provided by the IDRP, the retaining walls at either end of the underpass would provide resting points for users. The covered section of the underpass has been designed to be as short as possible given the constraints of the site, therefore minimising the area without resting points. The final design of the East-West Link, including the incorporation of rest points, will be addressed as part of the detailed design as required by the Section 106 obligation (ref:2018/01234/FUL) and as per this obligation will be designed in conjunction with LBHF and Network Rail.
- 10.6. It is therefore considered that the proposal will provide a high-quality environment, increasing permeability and access for all members of the community, and the additional commitments within the Design and Access Statement are considered reasonable to be secured through the suggested conditions. The proposal will comply with Local Plan Policies DC1, DC2 and T3 and London Plan Policy D5.

11. Highways and Transport

- 11.1. London Plan Policy T2 as well as Transport for London's London Cycle Design Standards which seeks to create healthy streets, where walking and cycling are increased. As well as improving safety, Policy T5, which seeks to remove barriers to cycling routes across London and provide cycle infrastructure and Policy D8 looks to achieve a well design, safe, accessible and inclusive public realm that is well connected to the local and historic context. Local Plan Policy T1 sets out the Council's intention to 'work with strategic partners to improve transport provision, accessibility and air quality in the borough, by improving and increasing the opportunities for cycling and walking, and by improving connections for bus services, underground, national and regional rail. Policies T3 and T7 deal with opportunities for cycling and walking and demolition/construction logistics.

- 11.2. The current pedestrian route connecting the southern end of Latimer Road to the entrance to White City North Campus is via Latimer Road, North Pole Road and Wood Lane, and is around 1 km in distance. The proposal will improve the connectivity for pedestrians and cyclist through the site to the east and west and onwards to the north or south, improving walk times to those who are looking to access areas to the east in Latimer Road or such as White City and Wood Lane Underground and Shepherd's Bush Bus and Rail Stations.
- 11.3. The proposed East-West Link would significantly reduce travel time between these two points. The link would provide an accessible route for both pedestrians and cyclists. The link is designed as part of the wider Imperial Campus and forms part of a wider piece of infrastructure works, designed to improve connectivity through the immediate and surrounding area. A wayfinding strategy, linked to the Masterplan development coming forward for the South campus, would capture connectivity with the East-West Link.
- 11.4. The access strategy for the development is to create a permeable, well-connected, easy to navigate route which allows residents, students and workers, 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 people of all mobilities. Landscaping will be used to create an attractive space which feels welcoming and therefore promotes journeys on foot.
- 11.5. The underpass and associated routes would provide a safe and welcoming environment. The proposed development would be well lit, controlled by CCTV, and be of a high-quality robust design. The proposed underpass layout shows sufficient visibility at the entrance. Proposed planting would be kept to a low height. The interaction between the iHub and wider North Campus and proposed South Campus would be connected to the East-West Link. DZ1 will generate pedestrian activity and would see additional users in the public realm making use of the landscape design features proposed as part of this application.
- 11.6. It is expected that there will be light vehicular traffic within this area because of the existing iHub delivery and servicing. Existing controlled bollards in LBHF are designed to manage traffic entering the basement of the iHub building. This access arrangement operates as a one-way access point and is designed to control unauthorised motorists. The wider North Campus already incorporates substantial hostile vehicle mitigation measures. Vehicles approaching the South side of the iHub must pass through an existing security barrier at the Wood Lane entrance, which is equipped with security bollards demonstrating that the Campus already operates protection measures. The South Campus similarly will include bollards and security checks with vehicle access controlled via the new bridge link across the Central Line from Wood Lane.
- 11.7. The proposed barriers (planters and bollards) are designed to deter mopeds, e-scooters, and other unauthorised vehicles from using the East-West Link. Bollards would be spaced a minimum of 1200mm apart. The design approach is compatible with London Cycle Design Standards (LCDS) guidance on the prevention of unauthorised vehicle access. To reinforce this, the underpass will be managed and

monitored by Imperial's wider Security Team, with continuous CCTV surveillance to ensure the space remains safe and restricted to pedestrians and cyclists. The Applicant states that misuse will be actively discouraged and responded quickly to by on-site security personnel. Imperial is committed to creating and maintaining a safe and inclusive public space. The underpass will be treated as an extension of its campus, with constant checks and ongoing oversight to prevent unauthorised access and maintain a welcoming environment. The existing bollards on the iHub side will remain in place, effectively controlling access from that direction and further limiting the potential for misuse. Officers are satisfied that there will be sufficient space for cyclists and pedestrians.

- 11.8. The White City area is an integral part of the London Cycle Network, and there is significant potential for linking journeys to and from the site by bicycle. The site would connect onto onward cycle routes provided immediately to the site on Wood Lane. Cycleway CS34 on Wood Lane can be accessed from the west side of the site, by the Westway. CS34 can be used for connections to North Acton and towards the centre of London via other cycle routes
- 11.9. A comprehensive wayfinding strategy is in development that would link to the wider Imperial Campus North and South. A wayfinding strategy is conditioned (Condition 72) as part of the White City South Planning Permission (ref: 2018/00267/OUT). A condition shall be secured to ensure connectivity with the wider existing/proposed Imperial wayfinding strategies.

Construction Logistics

- 11.10. In accordance with Local Plan Policy T7, an Outline Construction Logistics Plan (CLP) has been submitted. It includes logistics and site set up, initial details of construction traffic routing and site access points, strategies on how construction of the development will take place with minimal disruption to the surrounding area, including management arrangements, site working hours, liaison and communication to reduce disruption to site neighbours. Final documents including works associated with the demolition/excavation phase would be required to include construction vehicle routing, construction vehicle numbers, and other matters relating to traffic management to be agreed. A final detailed DLP and CLP shall be secured through standard planning conditions.

Westway and interface with exclusion zone

- 11.11. The proposal is situated within the 3.0m 'exclusion zone' along the edge of the Westway. Due to the site's proximity to TfL infrastructure, infrastructure protection measures associated with the construction and maintenance of the proposed development would be required. TfL has exclusive rights in this area to maintain the Westway. In response to TfL comments, the applicant provided plans and specifications for the proposed works. The plans show the location of the 3m easement/offset with the underpass. This will allow TfL sufficient space to construct scaffolding to maintain the side (upstand) of the Westway structure. TfL has confirmed that the underpass will need to be closed whenever TfL needs to conduct maintenance activities within the 3.0m 'exclusion zone' to facilitate access, scaffolding, etc. TfL requests that an Asset Protection Agreement (APA) be secured as part of permission and is secured by condition.

S278 Agreement

- 11.12. Works on the RBKC side are anticipated to be incorporated into a S278 agreement and a Stage 1 safety audit condition. S278 works to the public highway on Wood Lane / A40 junction were previously secured under planning permission for Campus North, associated with Buildings works to A and G (ref: 2018/01234/FUL). The final highway works have not been completed on Wood Lane at this stage, as Plot A is still to be delivered. The Council seeks to improve cycle connectivity between the underpass, Imperial Campus North and Cycleway 34 under the existing S278 agreement, so to secure improvements to the existing cycle route and crossing facilities for cyclists at this point. Measures including surface treatment/repairs, lighting and wayfinding; replacement bollards, provision of tactile paving will also need to be completed within Imperial campus where necessary between the public highway and underpass.
- 11.13. 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.

12. Residential Amenity

- 12.1. Local Plan Policy DC2 states that all new construction must be designed to comply with the principles of residential amenity.
- 12.2. A Security Statement has been provided in support of the application in accordance with Imperial's commitments to ensure safe operation. The use of stainless-steel bollards located on the RBKC side and planters on the H&F would have an acceptable impact on residential living conditions according to Local Plan policies DC2 and CC11.
- 12.3. The proposed development will likely increase activity in the area, generating additional noise. Noise levels would not be significant, particularly given the location of the site north of the Westway and between the two main Imperial campuses. The completion of the development on the DZ1 plot of the south masterplan would create a busy thoroughfare that will discourage anti-social behaviour. The proposed would not materially impact the living conditions of the nearest residential properties. The increase in footfall and activity combined with the proposed level of lighting and CCTV, is unlikely to encourage criminal activity or anti-social behaviour. Cameras will be monitored by Imperial College. The Imperial CCTV system is already connected with the LBHF CCTV control system. There will also be an interface for the Metropolitan Police via the network. The proposal would have an acceptable impact on residential living conditions according to Local Plan policies DC2 and CC11.
- 12.4. The underpass and the approach will be well-lit, ensuring a sense of safety and security at all times of day and night. Imperial will manage the East-West Link to ensure it is a safe and well-maintained connection with the public. The proposal would have an acceptable effect on amenities, in accordance with Local Plan policy CC12.

13. Fire Safety

- 13.1. 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 users. Policy D5 further ensures that developments incorporate safe and dignified emergency evacuation for all building users.

- 13.2. The application is accompanied by a fire safety plan prepared by Buro Happold. The proposal does not include any residential units and meets any threshold criteria for a referral to HSE Planning Gateway One. The Fire statement outlines that the underpass is not a building and is classified as an outdoor space. Therefore, no specific fire safety measures are required for this space. The covered section of the underpass is 20 metres in length and opened at both ends, so pedestrians/cyclists can leave at either end in the event of a fire. The strategy states the underpass will be constructed of non-combustible materials and non-combustible lining materials. In the event of a fire, the supporting statement states that services will be able to access Latimer Road and locate suitable parking locations near the underpass.
- 13.3. 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.

14. Security

- 14.1. London Plan Policy D11 seeks to design out crime, stating that developments maximise resilience and minimise potential risks to ensure the creation of a safe and secure environment. Local Plan Policy DC2 requires developments to be designed in line with the principles of Secured by Design.
- 14.2. The proposed development would be well lit and incorporate CCTV monitoring maintained by Imperial and connected to their Control Room. Hostile Vehicle Mitigation is sought to meet the existing curtilage both on the RBKC and LBHF side off Wood Lane. Officers consider that the Proposed Development accords with the London Plan and Policy DC2 of the Local Plan in respect of safety and resilience to emergencies.

15. Other Environmental Considerations

- 15.1. Local Plan Policy CC2 requires developments to implement sustainable design and construction measures, Policies CC3 (Minimising Flood Risk and Reducing Water Use) and CC4 (Minimising Surface Water Run-Off with Sustainable Drainage Systems) contain requirements designed to assess and mitigate against the risk of flooding and integrate surface water drainage measures into development proposals.
- 15.2. The site is located within Flood Zone 1 (less than 0.1% annual probability of flooding), so flood risks from the River Thames are low. The main source of flooding is from surface water during extreme rainfall and from sewer flooding. A Flood Risk Assessment (FRA) is provided by Curtins on behalf of the Applicant. Surface water flood mapping shows there are potential risks of flooding around the proposed site of the underpass, with the flooding hotspot areas identified on the RBKC side. The FRA notes that the drainage arrangements are split so that some surface water will be managed across the LBHF and RBKC sides.

- 15.3. The risk is considered medium to low (between 0.1% and 3.3% in any given year) and runoff will be reduced through the proposed drainage design in the wider Imperial White City Campus North and South Masterplans. It is proposed to use channel drainage at the entrances and along the underpass to collect surface water. Much of the site in LBHF would be absorbed into the existing drainage infrastructure serving Blocks C&D of the White City Campus North. The FRA also states that the system was built to accommodate run-off from the underpass, and there will be no increase in discharge rates. The FRA states there are no sewers within the site area due to the rail line passing through the centre. A surface water pump and attenuation tank connection were provided as part of Plot D construction.
- 15.4. Officers consider that subject to a condition requiring compliance with the Flood Risk Assessment, the proposed development accords with Policies CC3 and CC4 of the Local Plan 2018.
- 15.5. Local Plan Policy CC9 requires a site assessment and a report on its findings for developments on or near sites known to be (or where there is reason to believe they may be) contaminated. Development will be refused 'unless practicable and effective measures are to be taken to treat, contain or control any contamination'. Any permission will require that any agreed measures with the council to assess and abate risks to human health or the wider environment are taken as the first step of the development.
- 15.6. A Phase 1 Preliminary Risk Assessment Report has been prepared by Curtins on behalf of the Applicant. The development site (land within the North and South Campus) has previously conducted ground investigation and data from nearby developments has been utilised for consideration. Given the development and intrusive works comprising excavation works to form an underpass going beneath the railway, this would result in a large-scale removal of soils and sub-surface activity which increases the potential for encountering contaminated land. The risk assessment determines an overall low level of risk to environmental receptors associated with the proposed development and concludes no further requirements such as a generic quantitative risk assessment (GQRA) are required to determine the potential contamination risk on-site and therefore no further ground investigation works are required. Potentially contaminative land uses (past or present) have been identified at, and or near to this site. An informative will be included requiring the applicant to contact the Council if any unexpected materials or malodours are encountered during construction works.
- 15.7. 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.
- 15.8. 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) and South Africa Road. During demolition and construction works, dust and PM₁₀ releases are anticipated, but these impacts can be minimized through good practice and mitigation measures, leading to negligible effects. Subject to the inclusion of conditions seeking to

minimize air quality effects during the demolition and construction works, 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.

- 15.9. During construction works, the implementation of good industry standards, guidance and practice procedures (i.e. Considerate Contractors scheme) will be followed to minimise noise effects. General construction hours will be adhered to, Specific out of hours working may also be required for elements of sheet piling and box jacking works and will be dependent on possession working dates from Network Rail. Noise and vibration during these periods will be managed to reduce impacts, and mitigation measures will be set out within the final Construction Management Plan and Construction Logistics Plan secured by conditions. Officers consider subject to the inclusion of conditions requiring the implementation of the submitted documents and further information, the proposed development will accord with Policies CC11 and CC13 of the Local Plan.
- 15.10. The site is located within the Wormwood Scrubs Railway Embankment SINC (Site of Importance for Nature Conservation) covered by Local Plan Policy OS4. The proposal will only cover a small area of the SINC and result in minor tree loss to facilitate the construction of the underpass entrances. Most of the existing trees on the embankment will be retained and a continuous corridor of vegetation would remain in place ensuring that habitat connectivity through this part of the SINC is maintained. The SINC is also regularly subject to ongoing vegetation management from Network Rail as part of their maintenance programme, to maintain the safe operation of the rail network. Minor habitat loss during construction would be offset by Imperial's broader proposals for the wider White City Campus, increasing ecology value in the area. The proposed development would therefore not negatively impact this site (in terms of impacting biodiversity) and is acceptable in accordance with Policy OS4.

16. CONCLUSION AND RECOMMENDATION

- 16.1. The proposed development would improve connectivity and encourage activity that is likely to have positive impact on the character of the area. The development is a significant improvement from the existing appearance of the site.
- 16.2. The underpass is well design, ensuring the safety of pedestrian and cyclist. The design is simple and attractive and would improve the appearance of the area. The notable benefits provided by the scheme summarized in the report outweigh any issues. The proposed development therefore complies with policies outlined in the Local Plan.
- 16.3. The following Heads of Terms are proposed and are agreed with the applicant to further mitigate the impacts of the development.

General Obligations

- Secure Public Access via Imperial College land to the underpass.
- Delivery of the East-West Link (including underpass), prior to practical completion of 'Building A'.

- Completion of the agreements (tripartite agreement, permissive path agreement and maintenance agreement) as denoted in Paragraph 1.6 of the report, before commencement of the development hereby approved.

Highways Obligations

- Provision of a Construction Works Workforce Travel Plan & Monitoring Contribution prior to commencement of the development (**£3,000 per annum**)
- Provision of a Construction Logistics Plan monitoring fee in accordance with Condition 6 (**£5,000 per annum**).
- Completion of S278 Highways Works to the Wood Lane / A40 junction in accordance with the requirements of Schedule 4 of the S106 agreement (ref: 2018/01234/FUL) dated 3 November 2020, prior to the first operational use of the underpass.

Air Quality Obligation

- Air Quality Dust Compliance: Monitoring fee of **£5,000 per annum** from the commencement of the development, for the purpose of reviewing and monitoring the construction site AQDMP compliance plan (Condition 7) during the construction works of the development.

- 16.4. Subject to the obligations and conditions discussed in this section of the report, officers are satisfied that there would be no additional harm to the safe operation of the highway. Active travel routes would be improved to enhance pedestrian and cyclist safety, and adequate provision would be made on site for cycle parking. As such, the proposal complies with the relevant London Plan and Local Plan policies.
- 16.5. Accordingly, officers support the proposed development in line with the recommendations at the start of this report.