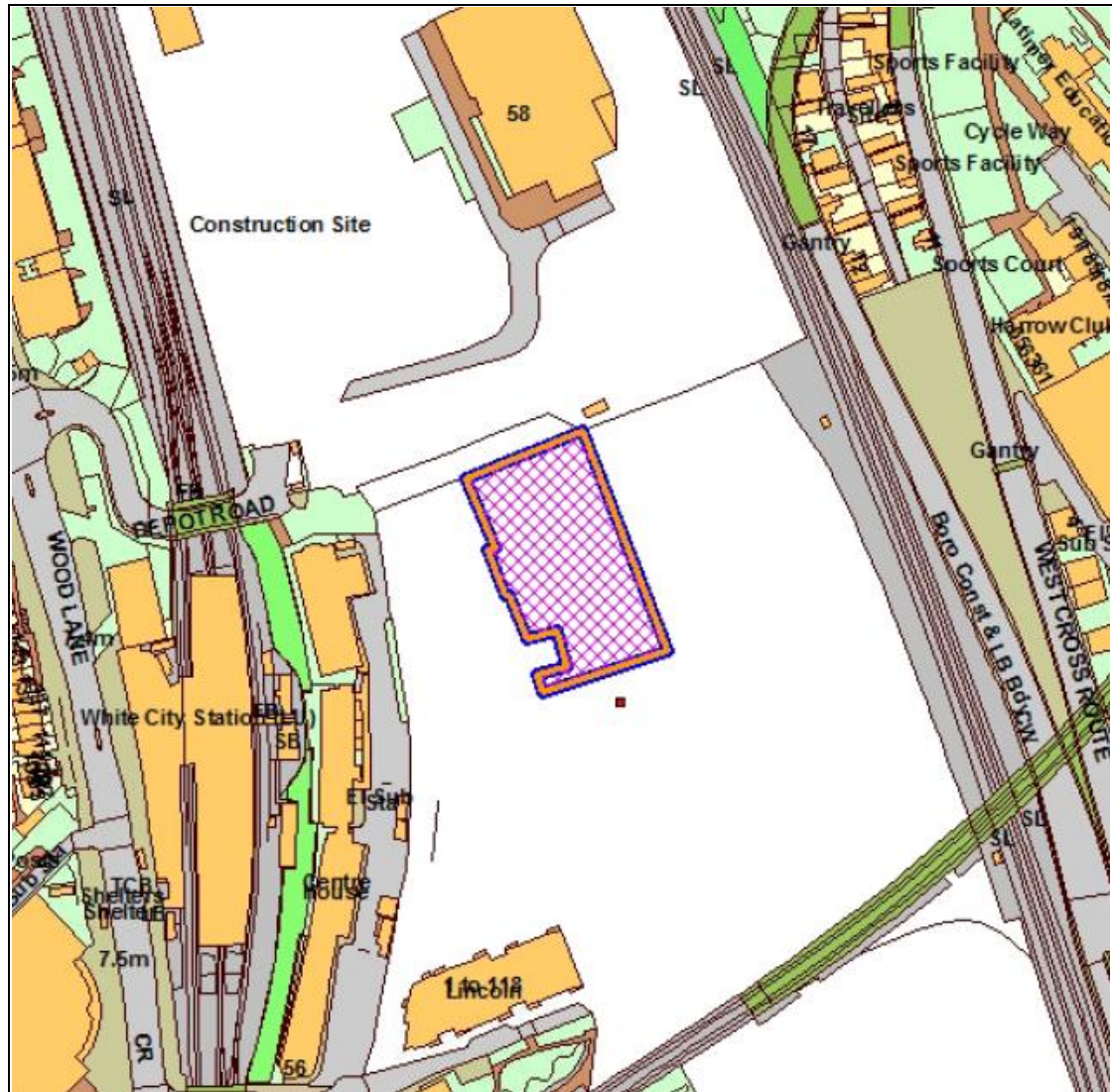


**Ward:** College Park And Old Oak

**Site Address:**

White City Living 54 Wood Lane London W12 7RQ



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LA100019223 (2013).  
For identification purposes only - do not scale.

**Reg. No:**  
2024/02570/FUL

**Case Officer:**  
Sinead Winship-David  
Jesenka Oezdalga

**Date Valid:**  
14.11.2024

**Conservation Area:**  
Wood Lane Conservation Area - Number 42

**Committee Date:**  
30.07.2025

**Applicant:**

St James

120 Bermondsey Street London SE1 3TX

**Description:**

Erection of a 30-storey building (plus plant) with single storey basement for residential (C3) use, with ancillary uses at the ground floor level and including associated landscaping, access, car and cycle parking and other engineering works.

Drg Nos: See Condition 2

**Application Type:**

Full Detailed Planning Application

**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 satisfactory legal agreement in accordance with 3 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 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 make any minor changes to the heads of terms of the legal agreement and finalise the legal agreement to deal with the matters set out in Section 26 of this report.

## **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) Drawings**

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

- 425-PTA-P5-00-DR-A-0012 Rev S4-PL1
- 425-PTA-P5-00-DR-A-0013 Rev S4-PL1
- PTA-425-PP-1001 Rev PL5
- PTA-425-A-PL-B1 Rev PL3
- 425-PTA-P5-B1-DR-A-0019 Rev S4-PL1
- 425-PTA-P5-XX-DR-A-0011 Rev S4-PL1
- 425-PTA-P5-ZZ-DR-A-0015 Rev S4-PL1
- 425-PTA-P5-ZZ-DR-A-0017 Rev S4-PL1
- 425-PTA-P5-ZZ-DR-A-0016 Rev S4-PL1
- 425-PTA-P5-ZZ-DR-A-0014 Rev S4-PL1
- D389-C-CUR-SW-XX-DR-5201
- D389-C-CUR-SW-XX-DR-5202
- 425-PTA-P5-ZZ-DR-A-1602 Rev S4-PL1
- 425-PTA-P5-ZZ-DR-A-1603 Rev S4-PL1
- 425-PTA-P5-ZZ-DR-A-1601 Rev S4-PL1
- 425-PTA-P5-ZZ-DR-A-1604 Rev S4-PL1
- 425-PTA-P5-B1-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-00-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-01-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-02-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-03-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-04-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-05-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-06-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-07-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-08-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-09-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-10-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-11-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-12-DR-A-1201 Rev S4-PL1

- 425-PTA-P5-13-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-14-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-15-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-16-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-17-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-18-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-19-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-20-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-21-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-22-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-23-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-24-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-25-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-26-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-27-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-28-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-29-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-30-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-RF-DR-A-1201 Rev S4-PL1
- 425-PTA-P5-RF-DR-A-0018 Rev S4-PL1
- 425-PTA-P5-ZZ-DR-A-1650 Rev S4-PL1
- 425-PTA-P5-ZZ-DR-A-1651 Rev S4-PL1
- 425-PTA-P5-XX-DR-A-0010 Rev S4-PL1
- PTA-425-PP-1010 Rev PL10
- PTA-425-PP-1011 Rev PL11

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 D1, D2, D3, D4, D5, D6, D7, D8, D9, D11, D12, D13, D14, HC1, HC3, HC4, G5 and G7 of the London Plan 2021 and Policies DC1, DC2, DC3, DC7 and DC8 of the Local Plan (2018).

### **3) Hoardings**

Prior to commencement of the construction phase of the development hereby permitted, a scheme for temporary solid timber hoarded fencing (minimum height 2.5 metres) around the perimeter of the site on all site boundaries and/or enclosure of the site 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 demolition/site clearance works and thereafter be retained for the duration of the building works. 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 surrounding residential occupiers, the street scene and public realm, in accordance with Policy D4 of the London Plan (2021), Policies DC1, DC8 and CC12 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

#### **4) Construction Management Plan**

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

- a detailed plan showing phasing,
- relevant foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent),
- contractors' method statements,
- waste classification and disposal procedures and locations,
- location of site offices, ancillary buildings, plant, wheel-washing facilities, stacking bays and car parking,
- details of storage and any skips,
- oil and chemical storage,
- membership of the Considerate Contractors Scheme,
- 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,
- 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,
- details of the use of on-road Ultra Low Emission Zone compliant Vehicles e.g. Euro 6 and Euro VI, and
- provisions within the site to ensure that all vehicles associated with the construction works are properly washed and cleaned to prevent the passage of mud and dirt onto the highway.

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

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

#### **5) Construction Logistics Plan**

Prior to the commencement of the construction phase of the development hereby permitted submit a Construction Logistics Plan in accordance with Transport for London and CLOCS guidance shall be submitted to and approved in writing by the Local Planning

Authority (in consultation with Transport for London). The Construction Logistics Plan shall cover the following minimum requirements:

- Site logistics and operations, on site plan of scale 1:500.
- Programme of works detailing the estimated number, size and routes of construction vehicles per day/week and to demonstrate how these have been reduced in relation to CLOCS planned measures and any traffic management measures.
- Establishment of a Construction Working Group detailing frequency to be held during the construction phase, involving all identified stakeholders. Stakeholders to include local neighbours, other construction sites within the vicinity of the development and other relevant stakeholders.
- Details from minutes of first Construction Working Group set up in advance of construction phase detailing stakeholder engagement and liaison undertaken in developing the CMP.
- Details on cumulative impacts and use of consolidation and co-ordination measures to be enabled to reduce impact of construction vehicle movements.
- Details on how complaints received will be actioned.
- Details on the display of contact details including accessible phone contact to persons responsible for the site works for the duration of the works.
- Construction vehicle routing and for avoidance of doubt, use of Fountain Park Way and the basement for large construction vehicle access is not supported.
- Submission of Imperial approval to use Depot Bridge access, to ensure vehicles are not directed to Fountain Park Way. Access via Fountain Park Way and the Underground link to be removed.
- Contact details for site managers and details of management lines of reporting.
- Detailed plan showing phasing.
- Location of site offices, ancillary buildings, plant, wheel-washing facilities. stacking bays and car parking.
- Storage of any skips, oil, and chemical storage etc.
- Access and egress points, with times of vehicle access restrictions to be set out at peak times,
- Details of the access arrangements and delivery locations on the site.
- Details of any vehicle holding areas, and restriction of vehicle numbers to no more than six vehicles maximum in any one hour; and other matters relating to traffic management to be agreed as required.
- Provision of any boundary hoarding to be behind any visibility zones.
- Details on monitoring, checklist and enforcement to be undertaken to ensure compliance with CLOCS.
- Highway Safety Assessment to be submitted, as set out under CLOCS section 5.1.
- Efficiency and sustainability measures to be undertaken for the works; and
- Details of Membership of the Considerate Contractors Scheme and confirmation that appointed contractors are CLOCS members and accredited to FORS Silver or above.

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

Reason: To ensure that appropriate steps are taken to limit the impact of the proposed construction works on the operation of the public highway, the amenities of residents and

the area generally in accordance with Policies T4 and T7 of the London Plan (2021) and T1, T6 and T7 of the Local Plan (2018).

## **6) Footway, Footpath and Cycleway layout**

Prior to the commencement of any above ground works, details of the road, footway, footpath and cycleway layout for the development, or relevant part thereof, shall be submitted to and approved in writing by the Council. The submitted details shall show the alignment, widths, surfacing arrangements, kerbs, access ramps (including the car park ramps with confirmation of vertical clearance), forward visibility sight lines and vision splays, speed restraint measures, turning heads, gradients, street lighting and drainage in respect of this part of the development and its connectivity with the rest of White City Living masterplan and beyond the north boundary with Imperial.

The development shall thereafter be implemented in full accordance with the approved plans and the building shall not be occupied until the approved ramps, roads, accesses, footways, footpaths and cycleways have been constructed and made available for use.

The development shall thereafter be maintained in full accordance with the approved details.

Reason: To ensure that the detailed design of the access ramps provides sufficient vertical clearance and capacity for vehicle manoeuvring in the interest of public safety and to ensure that the detailed design of the roads, footways and cycleways would avoid vehicle/pedestrian conflict in accordance with policies T1, T4 and T5 of the Local Plan (2018) and the Council's Planning Guidance Supplementary Planning Document.

## **Land Contamination:**

### **7) Contamination: Verification Report**

No development shall commence, save for any approved Enabling Works or (unless the Council agree in writing that a set extent of development must commence to enable compliance with this condition) until the approved remediation method statement prepared by Buro Happold (ref. 0040402, dated 6 December 2018) has been carried out in full and a verification report confirming these works has been submitted to, and approved in writing, by the Council. This report shall include: details of the remediation work carried out; results of any verification sampling, testing or monitoring including the analysis of any imported soil; all waste management documentation showing the classification of waste, its treatment, movement and disposal; and the validation of gas membrane placement. If, during development, contamination not previously identified is found to be present at the site, the Council is to be informed immediately and no further development (unless otherwise agreed in writing by the Council) shall be carried out until a report indicating the nature of the contamination and how it is to be dealt with is submitted to, and agreed in writing by, the Council. Any required remediation shall be detailed in an amendment to the remediation statement and verification of these works included in the verification report. All works must be carried out in compliance with and by a competent person who conforms to 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. This condition is required to ensure that no unacceptable risks are caused to humans, controlled waters, or the wider environment during and following the development works, in accordance with Policies CC9 and CC13 of the Local Plan (2018) and SPD Key Principles LC1 to LC7 (2018).

#### **8) Contamination: Onward Long-Term Monitoring Methodology**

No development shall commence, save for any approved Enabling Works or (unless the Council agree in writing that a set extent of development must commence to enable compliance with this condition) until an onward long-term monitoring methodology report, in connection with condition 7, is submitted to and approved in writing by the Council where further monitoring is required past the completion of development works to verify the success of the remediation undertaken. A verification report of these monitoring works shall then be submitted to and approved in writing by the Council when it may be demonstrated that no residual adverse risks exist. All works must be carried out in compliance with and by a competent person who conforms to 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. This condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with Policies CC9 and CC13 of the Local Plan (2018) and SPD Key Principles LC1 to LC7 (2018).

#### **Thames Water:**

#### **9) Piling Method Statement**

No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling would be carried out including measures to prevent and minimise the potential for damage to subsurface water or sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the Local Planning Authority, in consultation with the relevant water or sewerage undertaker. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan.

Reason: To prevent any potential to impact on local underground water and sewerage utility infrastructure, in accordance with Policies CC3 and CC5 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).



## **10) Foul Water Capacity**

No development shall be occupied until written confirmation has been submitted to, and approved in writing by the Local Planning Authority that either:

1. Foul water Capacity exists off site to serve the development, or
2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. 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, or
3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed.

Reason: To ensure any identified potential network reinforcement required to accommodate the proposed development can be carried out and to prevent sewage flooding and/or potential pollution incidents in accordance with Policies CC3 and CC5 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

## **Air Quality:**

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

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

Reason: To comply with the requirements of Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

### **12) Non- Road Mobile Machinery (NRMM)**

Within a minimum of seven days prior to commencement of the enabling works, site clearance or demolition works 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 Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

### **13) Ventilation Strategy**

Prior to commencement of above ground works of the development hereby permitted, a Ventilation Strategy Report to mitigate the impact of existing poor air quality for the residential units (Use Class C3) 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 (NO<sub>2</sub>) - 10ug/m-3, Particulate (PM<sub>10</sub>) - 15 ug/m-3 and Particulate (PM<sub>2.5</sub>) - 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 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 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 (NO<sub>2</sub>) and Particulate Matter (PM<sub>2.5</sub>, PM<sub>10</sub>) filtration with air intakes on the rear elevation to remove airborne pollutants. The filtration system shall have a minimum efficiency of 90% in the removal of Nitrogen Oxides/Dioxides, Particulate Matter (PM<sub>2.5</sub>, PM<sub>10</sub>) in accordance with BS EN ISO 10121-1:2014 and BS EN ISO 16890:2016.
- 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.

The whole system shall be designed to prevent summer overheating and minimise energy usage and shall be maintained in accordance with manufacturer specifications.

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 Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

### **14) Ventilation Strategy (compliance)**

Prior to occupation of the development hereby permitted, details of a post installation compliance report, including photographic confirmation of the mitigation measures as included in the approved ventilation strategy as required by Condition 13 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 Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

#### **15) Indoor air quality**

Prior to occupation of the development hereby permitted, details (including manufacturer specification, installation/commissioning certificates and photographic confirmation) of the installed electric induction cooking stove in the kitchens of the residential units (Use Class C3) shall be submitted to and approved in writing by the Local Planning Authority.

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

Reason: To comply with the requirements of Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

#### **16) Secondary Mains Electricity Power/Uninterruptable Power Supply (UPS) compliance**

Prior to occupation of the development hereby permitted, details (including manufacturer specification, installation/commissioning certificates and photographic confirmation) of secondary mains electricity power supply or Zero Emission 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 Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

#### **17) Local Air Quality Building Emissions Heating Plant compliance**

Prior to occupation of the development, details (including manufacturer specification, installation/commissioning certificates, and photographic confirmation) of the installed Air Source Heat Pump (ASHP), to be provided for space heating and hot water for the water for the residential units (Use Class C3) shall be submitted to and approved in writing by the Local Planning Authority.

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

Reason: To comply with the requirements of Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

#### **18) Ultra Low Emission Strategy**

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

- Procurement policy and processes for contractors and suppliers that will incentivise and prioritise the use of Zero Exhaust Emission Vehicles in accordance with the emission hierarchy of 1) Walking Freight Trolley 2) Cargo bike (3) Electric Vehicle.
- Use of Zero Exhaust Emission Vehicles in accordance with the emissions hierarchy (1) Walking Freight Trolleys (2) Cargo bike (3) Electric Vehicle.
- Reduction and consolidation of deliveries and collections e.g., Waste
- Re-timing of deliveries and collections outside of peak traffic time periods of 07:00-10:00 and 16:00-19:00 hrs
- Facilities and measures for the residential units (Class C3) that will minimise the impact of vehicle emissions from increasing personal deliveries e.g., parcel lockers, concierge, Cargo bike bays etc
- The ULES shall be monitored and reviewed on an annual basis and any subsequent modifications or alterations to the ULES shall 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 Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

### **19) Electric Vehicle Charging Points**

Prior to the first occupation of the development hereby approved, details of the location and specification of the on-site electric vehicle charging points (EVCP) shall be submitted to, and approved in writing by, the Local Planning Authority. A minimum of 20% of the on-site blue badge parking bays shall have active electric vehicle charging points providing a minimum output of 7kW.

The electric vehicle charging points shall be installed in full accordance with the approved details prior to the first occupation of the development and shall be maintained and retained for the lifetime of the development.

Reason: To encourage the use of electric vehicles and to mitigate against poor air quality in accordance with Policy SI 1 and T6 of the London Plan (2021) and Policy CC10 of the Local Plan (2018). To ensure the suitable provision of electric vehicle charging within the development to meet the needs of future site occupiers and users, in accordance with policy T4 of the Local Plan (2018).

## **Environmental:**

### **20) Flood Risk and Sustainable Drainage Strategy**

Prior to commencement of the development (excluding Enabling Works) hereby permitted, an updated Flood Risk and Sustainable Drainage Strategy (SuDS), identifying further details of updated flood mitigation measures and details of how surface water would be managed on-site shall be submitted to and approved in writing by the Local Planning Authority. The updated Flood Risk and Sustainable Drainage Strategy shall be prepared in accordance with the principles of the approved Flood Risk Assessment.

Information shall include details on the proposed flood mitigation measures to the proposed basement levels, the design, location, and attenuation capabilities of the

proposed sustainable drainage measures including rain gardens, green roofs and attenuation tanks. Details shall further be provided of the proposed flow controls and flow rates for any discharge of surface water to the combined sewer system, with the aim of achieving greenfield rates for final discharges. It should further be demonstrated that rainwater harvesting has been 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 ensure that sufficient drainage capacity is made available to cope with the new development, and to avoid adverse environmental impact upon the community and to prevent any increased risk of flooding and to ensure the satisfactory storage of/disposal of surface water from the site in accordance with Policy SI 13 of the London Plan (2021) and Policy CC3 and CC5 of the Local Plan (2018).

### **21) Green/Brown Roofs**

Prior to commencement of the relevant part of the development, details of all green/brown roofs within the development; including the identification of further opportunities for these roofs (if feasible), planning, maintenance schedules and ecological enhancement measures 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 S1 13, G1 and G6 of the London Plan (2021) and Policy OS5 and CC4 of the Local Plan (2018).

### **22) Whole Lifecycle Carbon Assessment Post-Construction**

Prior to the occupation of the development hereby permitted, the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. Together with any supporting information, it should be submitted to and approved by the Local Planning Authority in writing.

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

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

Prior to the occupation of the development, a postconstruction monitoring report should be completed in line with the GLA's Circular Economy Statement Guidance. The report should be submitted to and approved by the Local Planning Authority in writing.

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).

## **24) Sustainability and Overheating**

The development hereby permitted shall be undertaken in full accordance with the approved sustainability statement (v.2, dated September 2024) and dynamic overheating report (v.3 dated September 2024). All measures shall be implemented prior to the first occupation of the building and shall be permanently retained thereafter.

Reason: In the interests of sustainability, energy consumption, reduction of CO2 emissions and reduction of water usage, in accordance with London Plan Policies SI2, SI3 and SI4 and Policies CC1, CC2 and CC7 of the Local Plan (2018).

## **25) Energy Strategy**

The development shall be carried out in accordance with the approved Energy Strategy (Dated September 2024) prepared by Hodkinson Consultancy and achieve a minimum 57% reduction in residential regulated carbon dioxide calculated using the Part L 2013 methodology and SAP 10.2 carbon dioxide emission factors.

No part of the development shall be used or occupied until it has been carried out in accordance with the approved details and shall thereafter be permanently retained in this form.

Reason: In the interests of energy conservation and reduction of CO2 emissions, in accordance with London Plan Policies SI2, SI3 and SI4 and Policies CC1, CC2 and CC7 of the Local Plan (2018).

## **Noise:**

### **26) Background Noise**

Prior to the commencement of above ground works, a noise assessment shall be submitted to, and approved in writing by, the Local Planning Authority. The noise assessment shall include details of external noise levels (including reflected and re-radiated noise) and details of the sound insulation of the building envelope. Details shall further be provided to demonstrate that internal rooms and external amenity spaces shall comply with BS8233:2014.

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

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

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

Prior to the first installation of any plant, details shall be submitted to and approved in writing by the Local Planning Authority, of the external sound level emitted from plant/ machinery/ equipment and mitigation measures as appropriate. The measures shall ensure that the external sound level emitted from plant, machinery/ equipment will be lower than the lowest existing background sound level by at least 10dBA in order to

prevent any adverse impact. The assessment shall be made in accordance with BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity.

A post installation noise assessment shall be carried out where required to confirm compliance with the sound criteria and additional steps to mitigate noise shall be taken, as necessary.

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

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

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

Prior to the use of any machinery, plant/ equipment, details of anti-vibration measures shall be submitted to and approved in writing by the Local Planning Authority. The measures shall ensure that any machinery, plant, extract/ ventilation system and ducting are mounted with proprietary anti-vibration isolators and fan motors are vibration isolated from the casing and adequately silenced.

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

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

## **29) Vibration Levels**

Prior to commencement of above ground works, details shall be submitted to and approved in writing by the Local Planning Authority, of building vibration levels (generated by the railway), together with appropriate mitigation measures where necessary. The criteria to be met and the assessment method shall be as specified in BS 6472:2008.

No part of the development shall be occupied until the approved details have been implemented. Approved details shall thereafter be permanently retained.

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

### **30) Separation of noise sensitive rooms (communal areas)**

Prior to commencement of the development, details shall be submitted to and approved in writing by the Local Planning Authority, of the sound insulation of the floor/ ceiling/ walls separating the basement car park and communal facilities from noise sensitive premises (i.e. dwellings). Details shall demonstrate that the sound insulation value  $D_{nT, w} + C_{tr}$  [and  $L'_{nT, w}$ ] is enhanced by at least 15dB above the Building Regulations value and, where necessary, additional mitigation measures implemented to contain commercial noise within the commercial premises and to achieve the criteria  $L_{Amax, F}$  of BS8233:2014 within the noise sensitive premises.

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

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

### **Artificial lighting:**

#### **31) Floodlights, Security lights and Decorative External Lighting**

Prior to occupation of the development, details of external artificial lighting, including security lighting, shall be submitted to and approved in writing by the Local Planning Authority. Lighting contours shall be submitted to demonstrate that the vertical illumination of neighbouring premises is in accordance with the recommendations of the Institution of Lighting Professionals in the 'Guidance Note 01/21: Guidance Notes for the Reduction of Obtrusive Light'. Details should also be submitted for approval of measures to minimise use of lighting and prevent glare and sky glow by correctly using, locating, aiming and shielding luminaires.

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

Reason: To ensure that the amenity of occupiers of surrounding premises is not adversely affected by lighting, in accordance with Policies CC12 and CC13 of the Local Plan (2018).

### **Design and Materials:**

#### **32) Materials**

Prior to the commencement of the façade installation, details of particulars and samples (where appropriate) of all the materials to be used in all external faces and roofs of the buildings; including details of the colour, composition and texture of the materials, and metal work; details of all surface windows including window opening and glazing styles (in a manner that will take into account the privacy and amenity of residential premises overlooked by the development); balustrades to balconies and roof terraces; roof top plant and general plant screening; entrances and ground floor, shall be submitted to and approved in writing by Local Planning Authority.

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



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, Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018) and guidance contained within the Planning Guidance Supplementary Planning Document (2018).

### **33) Sample Panels**

Prior to the commencement of the facade installations, sample panels for the development, detailing brick colour, bond, pointing style, mortar colour, and curtain walling shall be produced for on-site inspection by Council Officers, along with the submission to the Local Planning Authority of samples of these materials, for subsequent approval in writing.

A supporting statement shall further be submitted to the local planning authority for approval in writing setting out the detailed specifications of each material indicating performance, sustainability rating, impacts from weathering and exposure to pollution sources in order to demonstrate that the materials are of the highest quality.

The development must be carried out in accordance with the submitted material samples and sample panel, and the development shall thereafter be permanently retained and maintained as such.

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, Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018), and guidance contained within the Planning Guidance Supplementary Planning Document (2018).

### **34) Detailed drawings (1:20)**

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

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

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, Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018), and guidance contained within the Planning Guidance Supplementary Planning Document (2018).

### **35) Detailed drawings – boundaries (1:20)**

Prior to the commencement of the public realm surface works, detailed drawings at a scale not less than 1:20 (in plan, section, and elevation) of boundary walls, fences, railings, and gates shall be submitted and approved in writing by the Local Planning Authority and no part of the development shall be used or occupied prior to the completion of the relevant works in accordance with the approved details. Details shall further demonstrate that no permanent boundary structure shall be erected that would unduly inhibit the flow of pedestrians between the development and any future development to the immediate north.

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

### **36) Detailed drawings – Roof Top Plant Enclosures (1:20)**

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

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

### **37) Secure by design**

Prior to the first occupation of the development hereby approved, a statement of how "Secured by Design" requirements are to be adequately achieved, shall be submitted to and approved in writing by the Local Planning Authority. The approved secured by design measures shall be implemented in accordance with the approved statement prior to occupation of the development hereby approved.

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 and DC8 of the Local Plan (2018).

### **38) Obscured glass**

The window glass at ground level shall not be mirrored, painted, or otherwise obscured, other than where it serves a stair core, wet riser inlet or other servicing area and shall be permanently retained as such.

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

### **39) Landscaping and public realm**

Prior to completion of the landscape/public realm works hereby permitted, details of the proposed soft and hard landscaping of all areas external to the building shall be submitted to and approved in writing by the Local Planning Authority.

The details shall include, but are not limited to: planting schedules and details of the species, height and maturity of any trees and shrubs, including sections through the planting areas; depth of tree pits, containers and shrub beds; details relating to the access of building, pedestrian surfaces, wayfinding, disabled drop off areas, loading bays, pedestrian crossings means of pedestrian/cyclist conflict resolution, materials, kerb details, external steps and seating, street furniture, bins and lighting columns that ensure a safe and convenient environment for blind and partially sighted people. Details shall further be provided of provision made for rainwater harvesting.

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 D3, D4, D8, D9 and HC1 of the London Plan (2021), Policies DC1, DC2, DC3, DC8, OS2 and OS5 of the Local Plan (2018).

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

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

Any landscaping removed or severely damaged, dying or becoming seriously diseased within 5 years of first planting shall be replaced with a tree or shrub of similar size and species to that originally required to be planted.

The landscape and ecological 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, and that the biodiversity of the site is protected and enhanced where possible in accordance with Policies CC2, DC1, DC8, OS2, OS4, and OS5 of the Local Plan (2018).

### **41) Play equipment**

Prior to the commencement of above ground works, a scheme detailing the play equipment, boundary treatments and ground surface treatment of the outdoor play spaces, shall be submitted to the local planning authority and approved in writing. Any play equipment will be designed to be fully inclusive to ensure the play areas are

accessible to all and will be implemented in accordance with the approved plans, to be permanently retained thereafter. No less than 310sqm of play space shall be provided in total, with the quantum required to be provided for each age group. The play space shall include the provision of play equipment as appropriate for each age group.

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 GG1 of the London Plan (2021), policies OS1 and OS3 of the Local Plan (2018), the Council's Planning Guidance Supplementary Planning Document, and any other relevant best practice guidance.

#### **42) Details of benches, litter bins and signage**

Prior to the first occupation of the development hereby approved, details including the locations of the benches, litter bins and signage shall be submitted to and approved in writing by the local planning authority. The street furniture listed above shall be designed and sited to be fully inclusive and accessible for all users and will not provide any obstruction to disabled persons or people of impaired mobility and/or sight. The building shall not be occupied until the benches, litter bins and signage as approved have been provided, and must be permanently retained thereafter.

Reason: To ensure the satisfactory provision of facilities, in accordance with policies OS2 and OS3 of the Local Plan (2018) and the Council's Planning Guidance Supplementary Planning Document.

#### **43) Airwaves Interference Study**

There shall be no construction above the first floor to any development hereby permitted until the following details shall be submitted to and approved in writing by the Local Planning Authority:

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

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

Reason: To ensure that the existing airwaves reception is not adversely affected by the proposed development, in accordance with Policy D11 of the London Plan (2021).

#### **44) Post-Construction Airwaves Study**

Prior to the occupation of the Development the following information shall be submitted to the Local Planning Authority:

- i) The completion of a Post-Construction Airwaves Study (the Post-Construction Study) to minimise detrimental impacts to airwaves reception attributable to the development.
- ii) The implementation of a Scheme of Mitigation Works for the purpose of ensuring no material impact to the airwave reception attributable to the development identified by the Post-Construction Study, shall take place within 3 months of the submission of the Post Construction Study.

Such Scheme of Mitigation Works shall be first submitted to and approved in writing by the Council.

Reason: To ensure that the existing airwaves reception within/adjacent to the development site is not adversely affected by the proposed development, in accordance with Policy D11 of the London Plan (2021).

#### **45) Permitted Development Rights - Telecommunications**

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking or re-enacting that principal Order with or without modification), no aerials, antennae, satellite dishes or related telecommunications equipment shall be erected on any part of the development hereby permitted, without planning permission first being obtained.

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).

#### **46) Window Cleaning Equipment**

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

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

#### **Highways:**

##### **47) Blue Badge Parking**

Prior to the first occupation of any residential unit within the development hereby approved, blue badge accessible parking bays shall be installed and made available for eligible residents in accordance with the approved plans.

The blue badge parking bays shall be permanently retained as such for the lifetime of the development and made available for use by holders of a valid blue badge, at no additional cost to the occupier.

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).

#### **48) Cycle Parking**

Prior to the first occupation of any residential unit within the development hereby approved, full details of the cycle parking and associated facilities shall be submitted to and approved in writing by the Local Planning Authority.

The details shall include, but not be limited to:

- provision of 5no. accessible cargo bike parking spaces with cargo bike stands at ground floor level,
- the secure, covered, level and weatherproof storage for a minimum of 294 long-stay bicycles within an easily accessible part of the building, with 15 larger cycle spaces to be provided at grade for ease of access,
- the secure cycle parking for 5 short-stay bicycle users at grade,
- provision of safe routes for pedestrians and cyclists to travel within the basement car park and provision of alternative access, to remove conflict with vehicles,
- provision for cycle storage areas to be step-free from outside and inside,
- facilities to include cyclist storage lockers and equipment for basic maintenance, such as pumps, water, changing and lockers.

The approved cycle storage/parking facilities shall be completed prior to the first occupation of any residential unit within the development and permanently accessible for the storage of bicycles for residents and, where applicable, visitors for the lifetime of the development.

Reason: To ensure the suitable provision of cycle parking within the development to meet the needs of future site occupiers and users, in accordance with Policy SI 1 and T5 of The London Plan (2021), Policy T5 and T7 and CC10 of the Local Plan (2018).

#### **49) Car Parking and Cycle Parking Management Plan**

Prior to the first occupation of the development hereby permitted, a Car and Cycle Parking Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Car and Cycle Management Plan shall cover the following minimum requirements:

- Detailed layout demonstrating how private general car parking spaces will either not be made available for Phase 5 occupiers or clarify how the overall number will be reduced to align with the agreed ratio of 0.4, setting out a maximum of 65 spaces.
- Detailed layout, design and location plan of the long-stay, short-stay and cargo cycle storage areas.
- Details on how allocation of 10% Blue Badge car parking spaces to specific users will be provided, location and management of blue badge car parking spaces, to ensure

these are available for residents with valid blue badge only, in accordance with the blue badge car parking condition (without charge).

- The means of lighting and security of the cycle store and car park.
- Details on who is responsible for management and monitoring of the cycle storage area,
- The means of managing, monitoring, maintaining and enforcing the servicing layby, car park and cycle parking in perpetuity.
- On site road safety scheme, to include how daytime deliveries, taxi drop off and pick-ups and stopping by blue badge holder vehicles on site will be managed to ensure the safety of pedestrians. The scheme shall demonstrate how, in the absence of kerbs and vehicular entries into the envelope of the building, the risk of collisions between stopped vehicles and pedestrians, particularly those who are blind or partially sighted shall mitigated.

The approved parking spaces shall be marked out on-site and shall be operated only in accordance with the approved details and shall thereafter be permanently retained in this form.

Reason: To ensure the satisfactory provision and retention of parking facilities, in accordance with Policy T6 and T7 of the London Plan and T4 and T5 of the Local Plan (2018) and SPD key principle TR6 (2018).

## **50) Delivery and Servicing Plan**

Prior to the first occupation of the development a site wide Delivery and Servicing Plan in accordance with Transport for London's Delivery and Servicing Plan Guidance shall be submitted to and approved in writing by the Local Planning Authority. Details to include:

- times and frequency of servicing, waste and recycling vehicles connected to all users of the development,
- the types of vehicles to be used and hours of their operation, for all users of the development,
- location and management of servicing, waste and recycling vehicles for all users of the development,
- management strategy to prevent vehicles queuing on the internal roadway, at times when demand to access the Phase 1 concierge point is high,
- details on approach to remove bollards from essential servicing and delivery laybys, and details on how the on-site service yard will be maximised for use by Phase 5 and bins moved from the building to the main service yard for collection,
- details on how servicing and delivery vehicle movements will be reduced and how these operational trips would be promoted and encouraged to be undertake by more sustainable modes of delivery,
- mechanisms to be employed to minimise and reduce service and delivery trips accessing the site for all users of the development outside of peak traffic times,
- details that refuse storage enclosures for each permitted use, have been provided for the storage of refuse and recyclable materials, and that these identify servicing, waste and recycling areas off the public highway for all users of the development,
- the dimensions and layout of servicing and delivery laybys within the site connected to Phase 5 and associated turning spaces,

- space for vehicles to turn so that they may enter and leave the service yard in forward gear,
- details of swept path analysis to demonstrate that vehicles can enter and exit the site in forward gear without causing unreasonable delays and conflict with users on the wider masterplan site,
- details on reduction and consolidation of deliveries and collections, e.g. waste,
- quiet loading/unloading measures, in accordance with Building Design Guidance for Quieter Deliveries (TfL),
- details of measures setting out how the DSP will be managed, monitored and enforced.

The measures/scheme shall be implemented in accordance with the approved details upon the first occupation of the building hereby permitted and thereafter be permanently retained in this form.

Reason: To ensure that satisfactory provision is made for the parking and turning of delivery, refuse and servicing arrangements, do not compromise highway safety and to ensure that the amenity of surrounding properties are not adversely affected by noise and disturbance, in accordance with Policy T7 of The London Plan (2021), Policies T2, CC11 and CC13 of the Local Plan (2018) and SPD Key Principle TR28 (2018).

### **51) Operational Management Plan**

Prior to first occupation of the development hereby approved, an Operational Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Operational Management Plan shall include:

- details of hours of operation for the different permitted users,
- unless otherwise agreed in writing with the Local Planning Authority, the core staffing hours are given as 0800-1800 Monday-Saturday and 1000-1600 on Sunday,
- details on responsibility for the car and cycle management plan to cover enforcement relating to car parking and vehicular activity on-site,
- details on measures to enforce car and cycle parking management plans in event of non-compliance being identified,
- details on monitoring long-stay and short-stay cycle parking use, to include who provision about how this would be increased should demand be identified,
- details on security, to ensure that no removal of refuse nor bottles/cans to external bins or external refuse storage areas shall be carried out other than between the hours of 08:00 to 20:00 on Monday to Friday and 10:00 to 18:00 on Saturdays; and at no time on Sundays and Public/Bank Holidays,
- details on how short-stay cycle parking spaces will be maintained and managed,
- full details of refuse storage (including provision for the storage of recyclable materials), for all users
- management details setting out how restricted vehicle access will be managed and enforced,
- No deliveries nor collections/loading nor unloading, involving vehicles larger than 7.3m, shall occur at the development hereby approved within the lay-by at grade level, and



- lighting management plan relating to the operation, management and monitoring of the site for all permitted users.

The operational management plan measures/scheme shall be implemented upon first occupation of the building hereby permitted in accordance with the approved details and thereafter be permanently retained in this form.

Reason: To ensure that satisfactory provision is made for the management, monitoring and enforcement of site users to ensure that the amenity of surrounding properties is not adversely affected by noise and disturbance, in accordance with Policy T7 of The London Plan (2021), Policies T2, CC11 and CC13 of the Local Plan (2018) and SPD Key Principle TR28 (2018).

## **52) Refuse**

Prior to the first occupation of the development hereby permitted, provision for the storage and collection of refuse shall be made in full accordance with the approved Operational Waste Management Strategy (ref. 0040402 rev P01, dated 30 August 2024). The refuse facilities shall be maintained in their approved form permanently thereafter.

Reason: To ensure the satisfactory provision for refuse storage and recycling in accordance with policy CC6 of the Local Plan 2018 and the Council's Planning Guidance Supplementary Planning Document.

## **53) Inclusive Access Management Plan**

Prior to the commencement of the development hereby permitted, an Inclusive Access Management Plan (IAMP) shall be submitted to the local planning authority and approved in writing which sets out a strategy for ongoing consultation with specific interests' groups with regard to accessibility of the relevant part of the site. This shall include the access between the development site and any future development to the immediate north of the site where appropriate and relevant. On-going consultation must then be carried out in accordance with the approved IAMP. The development shall not be operated otherwise than in accordance with the Inclusive Access Management Plan as approved and thereafter be permanently retained in this form.

Reason: To ensure that the proposal provides an inclusive and accessible environment in accordance with the Policy D5 of the London Plan (2021), policies HO6 and E3 of Local Plan 2018 and the Council's Planning Guidance Supplementary Planning Document.

## **54) Fire rated lifts**

Prior to first occupation of the building hereby approved, details of fire rated lifts shall be submitted and approved in writing by the Local Planning Authority. All the lifts shall have enhanced lift repair services, running 365 days/24-hour cover, to ensure no wheelchair occupiers are trapped if a lift breaks down. The fire rated lifts shall be installed as approved and maintained in full working order for the lifetime of the development.

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

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

#### **55) Fire Strategy**

The development shall be carried out and completed in accordance with the approved Stage 2 Fire Strategy prepared by Introba (version P05, dated 12 September 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 Policy D12 of the London Plan (2021).

#### **56) Microclimate**

Prior to the first occupation of the development hereby permitted, microclimate mitigation shall be implemented in full accordance with the approved Wind Microclimate Assessment (ref. #2305377– REV D, dated 12 August 2024). The microclimate mitigation shall be permanently retained thereafter.

Reason: To ensure that suitable measures are incorporated to mitigate potential adverse wind environments arising from the development, in accordance with Policies GG1, D8 and D9 of the London Plan (2021) and Policies DC3 and CC2 of the Local Plan (2018).

#### **57) No advertisement**

No advertisements shall be displayed on or within any elevation of the building, forecourt or public spaces without details of the advertisements having first been submitted to and agreed in writing by the Local Planning Authority.

Reason: In order that any advertisements displayed on the building are assessed in the context of an overall strategy, to ensure a satisfactory external appearance and to preserve the integrity of the design of the building, in accordance with policies DC1 and DC9 of the Local Plan (2018).

#### **58) No alteration**

No alterations shall be carried out to the external appearance of the development hereby approved, including the installation of air conditioning units, water tanks, ventilation fans or extraction equipment, not shown on the approved drawings.

Reason: To ensure a satisfactory external appearance and prevent harm to the street scene, and to safeguard the amenities of neighbouring residential occupiers, in accordance with policy DC1 and DC2 of the Local Plan (2018) and the 'Planning Guidance' Supplementary Planning Document (2018).

#### **59) Residents' Bar**

The residents' bar area, as denoted on approved dwg. no. 425-PTA-P5-00-DR-A-1201 Rev. S4-PL1, shall be used only as an amenity space for residents of the White City Living masterplan site and only in a manner that is ancillary to the approved residential (use

class C3) use of the building. The residents' bar shall not be open to members of the public and shall not be operated as a commercial premises separate from the residential building within which it is located.

Reason: A sui generis drinking establishment use would raise materially different planning considerations which would require separate consideration by the Local Planning Authority.

#### **60) Amplified sound**

Neither music nor amplified voices emitted from the residents' bar 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).

#### **61) Outdoor seating**

Any outdoor seating areas hereby approved shall operate within the following hours only:

- Monday to Saturday: 0700 to 2200 hours
- Sunday and Public Holidays 0700 to 2200 hours

Reason: To ensure that the development does not result in conditions prejudicial to the amenities of local residents by reason of noise and disturbance in accordance with policy CC11 of the Local Plan (2018).

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#### **Reason(s) for granting planning permission:**

##### **1) Land Use and Principle of Development**

The proposed development forms the final phase of the White City Living Masterplan and is consistent with the land use principles established by the outline consent (ref. 2023/01965/VAR). The development would deliver 163 residential units on previously developed land within the White City Opportunity Area, in accordance with the London Plan Policies GG2, GG4, SD1 and H1, and Local Plan Policies HO1, WCRA and WCRA1.

##### **2) Design, Townscape and Heritage**

The proposed building is of high architectural quality and responds positively to its context, completing the northern edge of the Central Gardens and acting as a gateway marker. The design is consistent with the approved Design Codes and Parameter Plans and would enhance the character and appearance of the Wood Lane Conservation Area. The proposal is in accordance with London Plan Policies D3 and HC1 and Local Plan Policies DC1, DC2 and DC8.

##### **3) Housing Quality and Mix**

The development would provide a high standard of residential accommodation, with all units meeting or exceeding minimum space standards and benefiting from

private amenity space. The scheme includes a mix of unit sizes, including family-sized homes, and 10% of units are designed to be wheelchair adaptable. The proposal accords with London Plan Policies D6 and H10 and Local Plan Policies HO4, HO5 and HO11.

**4) Affordable Housing**

The affordable housing provision for the masterplan, including Phase 5, has been secured through previous consents and legal agreements. The viability of Phase 5 has been independently assessed and determined to be unable to viably support additional affordable housing beyond that already secured. The masterplan scheme delivers 24% onsite affordable housing and a payment in lieu of £34.5m. The proposal is therefore in accordance with London Plan Policies H4 and H5 and Local Plan Policy HO3.

**5) Transport and Accessibility**

The site benefits from excellent public transport accessibility (PTAL 6a). The development includes appropriate levels of cycle parking and accessible parking, with a strategy to increase provision if required. A Delivery and Servicing Plan, and Construction Logistics Plan will be secured by condition. Travel plans will be secured through the legal agreement. The proposal is in accordance with London Plan Policies T1, T5 and T6 and Local Plan Policies T1, T2, T3, T4 and T5.

**6) Environmental Impact Assessment**

The Environmental Statement Addendum confirms that the proposed development would not give rise to any new or significant adverse environmental effects. All previously identified residual effects remain valid, with marginal improvements to wind microclimate conditions as a result of the mitigation included in the detailed design. The proposal complies with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

**7) Sustainability and Energy**

The development achieves a 57% reduction in regulated residential carbon emissions through on-site measures and will connect to a low-carbon site-wide energy network. A carbon offset payment will be secured to achieve net zero. The proposal is in accordance with London Plan Policies SI2, SI3 and SI4 and Local Plan Policies CC1 and CC2.

**8) Flood Risk and Drainage**

The site lies within Flood Zone 1 and is at low risk of flooding. The drainage strategy integrates with the wider masterplan and includes SuDS features. The proposal is in accordance with London Plan Policies SI12 and SI13 and Local Plan Policies CC3 and CC4.

**9) Biodiversity and Urban Greening**

The development achieves an Urban Greening Factor of 0.42, exceeding the London Plan target. The landscaping strategy supports biodiversity and includes green roofs and pollinator-friendly planting. The proposal is in accordance with London Plan Policy G5 and Local Plan Policies OS1 and OS5.

**10) Amenity**

The development would not result in unacceptable impacts on the amenity of existing or future residents in terms of daylight, sunlight, privacy, or overlooking.

The proposal complies with London Plan Policies D6 and D14 and Local Plan Policies DC2, DC3 and HO11.

**11)Environmental Quality**

The scheme includes robust strategies for air quality, noise, vibration, and waste management. The acoustic design and air quality assessments confirm compliance with relevant standards. The proposal complies with London Plan Policies SI1 and D14 and Local Plan Policies CC10, CC11 and CC13.

**12)Inclusive Design and Accessibility**

The development has been designed to be inclusive and accessible, with step-free access throughout and 10% of homes designed to M4(3) standards. The proposal is in accordance with London Plan Policies D5 and S3 and Local Plan Policy DC2.

**13)Planning Obligations and Infrastructure**

The masterplan development is subject to a legal agreement that secures planning obligations including affordable housing, financial contributions to the White City Opportunity Area Fund, delivery of public open space, employment and skills initiatives and highways initiatives. A deed of variation will amend the legal agreement to incorporate the drop in permission and to bind the permission to all obligations contained therewithin. The deed of variation will further amend the carbon offsetting clause to increase the payment in line with the Council's tariff schedule. The proposed development would therefore mitigate external impacts and would accord with Policy CF1 of the Local Plan 2018.

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

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

Application form received: 11th October 2024  
Drawing Nos: See Condition 2

**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:**

**Comments from:**

Transport for London (TFL) - Spatial Planning  
Health And Safety Executive Fire Safety  
Historic England London Region  
Thames Water - Development Control  
London Underground Limited – Infrastructure protection  
Civil Aviation Authority - Safety Regulation Group  
Active Travel England  
Greater London Authority (GLA)

**Dated:**

13.12.24  
13.12.24  
28.11.24  
10.12.24  
13.12.24  
28.11.24  
29.11.24  
04.12.24

## **Neighbour Comments:**

### **Letters from:**

### **Dated:**

Newall Court, Bronze Walk London W12	12.12.24
Apt. 307 3 Television Centre 101 Wood Lane London W12	02.12.24
H617 101 Wood Lane London W12	11.12.24
704, 3 Television Centre 101 Wood Lane London W12	11.12.24
Apt 401, 3 Television Centre 101 Wood Lane London W12	08.12.24

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## **OFFICER REPORT**

### **1. Background**

1.1. The application site, known as Plot C1 (Phase 5), forms part of the wider White City Living (WCL) Masterplan, a comprehensive residential-led redevelopment of the former Marks & Spencer warehouse site at 54 Wood Lane, W12. The WCL Masterplan benefits from outline planning permission (ref: 2014/04726/OUT, as amended by subsequent Section 73 applications, the most recent being ref: 2023/01965/VAR) for up to 2,030 residential units, alongside commercial, community and leisure uses, extensive public realm, and associated infrastructure. The masterplan is being delivered in five phases, with Reserved Matters approvals already granted for Phases 1 to 4. Phase 5 represents the final component of the masterplan and is brought forward as a full planning application due to timing constraints.

1.2. Condition 2 of the original masterplan permission ref. 2014/04726/OUT (as amended) specifies time limits for reserved matters of each phase to be submitted. The time limit for submission of reserved matters for Phase 5 (subject of the current application) expired on 16 December 2022.

1.3. The developer has therefore submitted a standalone drop in application for Phase 5. This application does not seek to intensify the development, nor does it seek any other changes to the approved masterplan. It seeks only to rectify the departure from Condition 2(iii) as described in para. 9.1 – 9.7 below and provide a mechanism to allow for this phase to be brought forward and delivered.

### **Mayoral Referral**

1.4. Under the terms of the Town & Country Planning (Mayor of London) Order 2008, the Greater London Authority has been notified as the proposals constitute 'Large Scale Development' as defined by the Order.

1.5. The GLA responded on 4 December 2024 and advised that given the scale and nature of the proposals, they had concluded that the current application does not give rise to any new strategic planning issues. As such, the application will not need to be referred to the Mayor of London prior to issuing a decision notice.

## 2. Site & Surroundings

### White City Living Masterplan Site

2.1. The application site was previously occupied by a 21,807sqm Marks and Spencer warehouse with associated car parking and service yard. The site was acquired by the St James Group in 2014. The former warehouse was demolished and Phases 1, 2 and 3 of the White City Living masterplan have been delivered. Construction of Phase 4 lawfully commences in 2025. The masterplan site comprises approximately 4.28 hectares.

2.2. The current application relates only to Phase 5 of the masterplan development which is located to the northern extent of the site. This site has been cleared.



Figure 1 – Plan showing the WCL Masterplan as approved. Phase 5 is edged in red

### Surrounding Area

2.3. The site is highly accessible, which is reflected in its Public Transport Accessibility Level (PTAL) of 6b. White City Bus Station with numerous bus services is located to the south of the Site and White City and Wood Lane London Underground Stations are a short walk to the north and south of the masterplan site respectively, providing access to the central, circle and Hammersmith and City Lines. Shepherd's Bush Station is also located approximately 800m to the south of the Site and is served by overground and National Rail services.

## Planning Designations

- 2.4. The London Plan (2021) designates the site within the White City Opportunity Area, which is expected to deliver a substantial number of new homes and jobs through comprehensive regeneration. The White City Opportunity Area Planning Framework (WCOAPF, October 2013) identifies the site within the White City East Area and within a proposed housing area as part of mixed-use schemes.
- 2.5. The Local Plan (2018) identifies the site as being located within the Wood Lane Conservation Area, which was designated by LBHF in 1991 to principally protect the Grade II Listed BBC Television Centre which is located 100m west of the masterplan site. It is also designated the Local Plan as being within a regeneration area and the White City Opportunity Area/White City Regeneration Area, and within Strategic Site WCRA1 'White City East'. The site is affected by Aerodrome safeguarding of Heathrow 150m and Northolt 91.4m and is also located in close proximity to listed buildings most notably the BBC Television Centre and the Dimco Building off Ariel Way. The site is located within Flood Risk Zone 1 and is also located within a borough-wide Air Quality Management Area. The masterplan site does not contain any listed buildings or any nationally designated heritage assets such as scheduled monuments or registered parks and gardens and is not within an Archaeological Priority Area nor is it affected by any strategic views

## 3. Relevant Planning History

### WCL Masterplan

- 3.1. The original planning application (Ref: 2014/04726/OUT) for the comprehensive redevelopment of the site was granted permission on 16th December 2015 with the following description.

*“Planning application (part detailed/part outline) for the demolition of all existing buildings and structures and the redevelopment of the site for residential and mixed uses comprising the erection of new buildings ranging from 11 to 30 storeys to provide up to 1,465 residential units (Class C3) and use classes (A1-A5, B1, D1 & D2), the provision of a new publicly accessible open space, new pedestrian and vehicle routes, accesses and amenity areas, basement level car park with integral servicing areas and other associated works: Detailed planning application for up to 37,935 sqm. (GEA) new residential floorspace with ancillary residential facilities (C3) (excluding basement floorspace); up to 1,995 sqm. (GEA) flexible commercial floorspace (A1-A5), community (D1) and leisure (D2) (excluding basement floorspace); provision of a new basement level; provision of a new bridge over the central line cutting; means of access; and associated amenity space, landscaping, car parking and cycle parking, energy centre, and other associated infrastructure works”.*

- 3.2. This permission was varied in 2017 (ref: 2016/03907/VAR - the First Variation Application dated May 2017) and varied again in 2018 (ref: 2017/04377/VAR - the Second Variation Application) dated 25th June 2018. The description of the development of the second variation application is as follows:



*“Variation to conditions 1-8 of planning permission 2016/03907/VAR (for the comprehensive phased redevelopment of the site for a residential-led mixed-use development) granted 23/05/2017 in order to permit minor material amendments to the outline form of development. Amendments comprise modifications to the approved Parameters Plans and Development Specification and Parameters Report that cover design alterations to Development Plots B1 (varying the horizontal parameters (to -0.92m to +27.98m) to permit an extended southern building line), Development Plots D1 and E1 (varying parameters to extend the maximum heights by an additional +2.31m and 8.86m), Development Plots D2, D3 and E2 (varying parameters to extend maximum heights by an additional +4.79m) and incorporating a new additional Development Plot E3 (to comprise residential use within a new building up to 74.45m in height). The specified amendments would facilitate the optimisation of residential units to increase the overall maximum unit numbers from 1,477 to 1,814 units including the provision of an additional 118 affordable units (35% of the additional units)”.*

3.3. Permission was granted in September 2022 for a further variation to the consent (ref. 2021/02896/VAR). The description of development reads as follows:

*“Planning application under Section 73 of the Town and Country Planning Act (1990) seeking variations of Planning Conditions pursuant to planning permission Ref: 2017/04377/VAR (dated June 2018) for amendments to vertical and horizontal parameter plans of Phases 4&5 (Condition 3), amendments to Design Codes (Condition 4) increase in unit numbers (Condition 7) and in the maximum floorspace (Condition 8). The proposals will result in the demolition of all existing buildings and structures and redevelopment of the site for residential and mixed uses comprising the erection of new buildings ranging from 11-35 storeys to provide up to 2,030 residential units (Class C3) and use classes E, F1, F2 and sui generis (drinking establishment and takeaway), the provision of a new publicly accessible open space, new pedestrian and vehicle routes, accesses and amenity areas, basement level car park with integral servicing areas and other associated works”.*

3.4. A further application to vary the permission was approved in July 2023 (ref. 2023/01965/VAR) and remains the extant masterplan consent. The description of development was as follows:

*“Planning application under Section 73 of the Town and Country Planning Act (1990) seeking variations of Planning Conditions pursuant to planning permission Ref: 2021/02896/VAR (dated September 2022) for amendments to the vertical and horizontal parameters of Phase 4 (Condition 3), amendments to Design Codes (Condition 4) and amendments to the maximum floorspace (Condition 8). The proposals will result in the demolition of all existing buildings and structures and redevelopment of the site for residential and mixed uses comprising the erection of new buildings ranging from 11-35 storeys to provide up to 2,030 residential units (Class C3) and use classes E, F1, F2 and sui generis (drinking establishment and takeaway), the provision of a new publicly accessible open space, new pedestrian and vehicle routes, accesses and amenity areas, basement level car park with integral servicing areas and other associated works”.*

3.5. Reserved matters approval has been granted for Phase 2 (ref: 2017/04567/RES), Phase 3 (ref: 2019/01300/RES) and Phase 4 (ref: 2023/02105/RES).

3.6. There have been numerous applications for approval of details to satisfy the requirements of various conditions attached to the Masterplan consent. Similarly, there have been multiple s96a non-material amendment applications since the grant of the original outline consent. Those that are relevant to the current application are listed below:

- **2016/02063/NMAT** approved 1 August 2016: amendments to ref. 2014/04726/OUT dated 16th December 2015 (revisions to the wording of conditions 36, 37, 39, 74 and 85 to require details to be submitted and approved, prior to commencement of the relevant works (within a development plot)).
- **2016/03806/NMAT** approved 20 October 2016: amendment to ref. 2014/04726/OUT granted 16th December 2015 (revisions to amend the wording of condition 42 to read "prior to the completion of the basement slab within each development plot...")
- **2017/02913/NMAT** approved 16 October 2017: amendment to ref. 2016/03907/VAR dated 23rd May 2017 (reconfiguration of the basement level).
- **2019/00722/NMAT** approved 1 August 2018: amendments to ref. 2017/04377/VAR dated 25 June 2018 (revisions to the approved horizontal and vertical parameter plans to allow amendments to the proposed form and height of Building E1; clarification to the ground floor land uses parameter plan (to indicate flexible ground floor uses in Building E2); and position and siting of buildings D2, D3, E2, E3; amendments to the Mandatory Design Code; and Phasing Plan; including variation of condition 4 (design codes and parameter plans) and condition 5 (phasing plan)).
- **2021/02215/NMAT** approved 3 September 2021: amendment to ref. 2017/04377/VAR dated 25 June 2018 (to revise the description of development as set out in the consented Decision Notice to omit references to building heights and quantum of residential units and to update the approved land uses in line with the current Use Class Order).
- **2024/02171/NMAT** approved 3 October 2024: amendment to ref. 023/01965/VAR dated 21 August 2024 (vary Condition 4 of planning permission ref. 2023/1965/VAR with changes to the design code relating to the height of the base component on Building C1 (reduced from 9m to 6m) and the removal of glazed terracotta as the primary facing material on Building C1)

## Surrounding Sites

3.7. The surrounding area currently comprises predominantly of commercial, residential and retail uses. Immediately to the north of the site is the former Dairy Crest site. Outline consent (ref. 2018/00267/OUT) was granted in April 2021 for an application submitted by Imperial College London for the re-development of the site. The scheme for Imperial Campus South comprises predominantly of research, offices and educational use buildings, as well as 373 residential units and a new hotel.

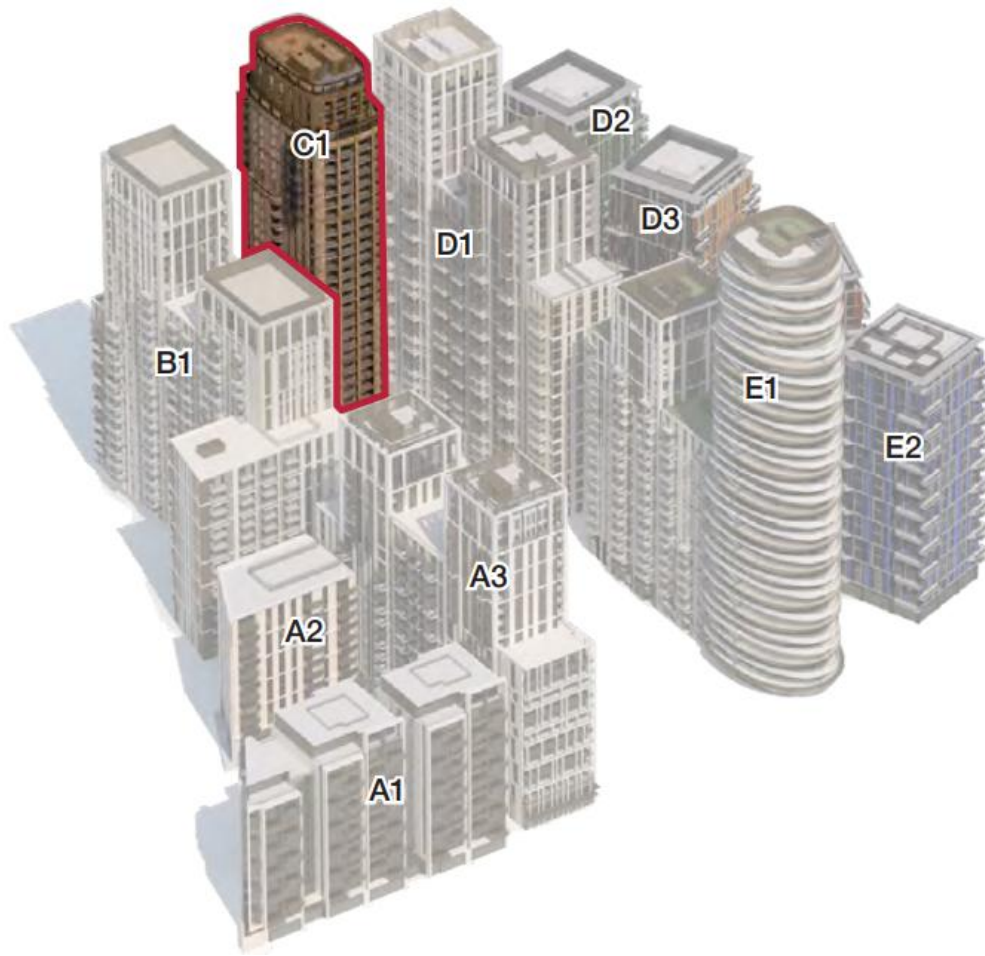
3.8. The Westway Travellers' site is located approximately 250m to the northeast of the masterplan site underneath the A3320 flyover. To the east is the West London Line Railway, the railway embankment is designated as a Green Corridor and area of Nature Conservation and the A3320 lies beyond this. The A3320 is a major multi-lane highway

and is set at an elevated level for much of its length, therefore acting as a major physical barrier between the areas either side of it. The area immediately to the east of the West Cross Route is largely occupied by commercial buildings and lies within the Royal Borough of Kensington and Chelsea.

3.9. Approximately 300m to the south of the masterplan site is Westfield Shopping Centre. The site has planning permission for a retail/leisure extension and residential dwelling on land to the north of the existing shopping centre (ref. 2013/05115/OUT). The retail and leisure extension has been completed, along with the residential Block K. In April 2021 a new outline planning application was submitted for a mixed-use scheme at the Westfield site (ref. 2021/01101/OUT). This involves the erection of new buildings ranging from 30m-122m AOD above podium plus basement level, and the provision of up to 1700 (Class C3) residential units. Outline consent was granted in January 2024.

#### **4. Description of Development**

4.1. This application seeks full planning permission for the development of Plot C1 (Phase 5) within the White City Living Masterplan. The proposal comprises the construction of a single, predominantly residential building, completing the final phase of the masterplan and forming the northern edge of the 'Central Gardens'. The building is designed as a "marker typology" within the masterplan, signifying a key gateway at the northern entrance to the site and establishing a future connection with the adjacent Imperial College London (ICL) South campus. The proposals also include associated engineering works, access arrangements, and landscaping features that support the wider townscape and placemaking objectives of the White City Opportunity Area.



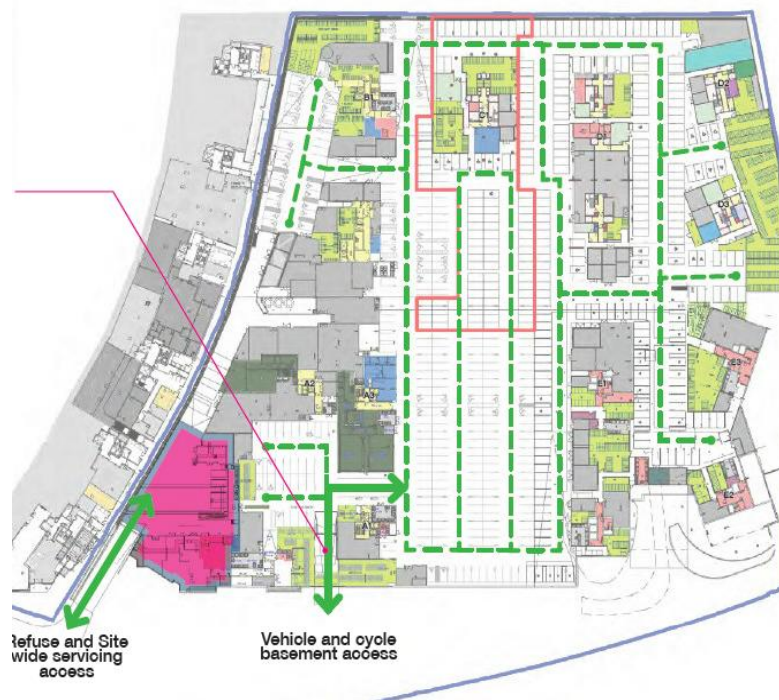
*Figure 2 – Building Plot C1 showed in context of wider WCL masterplan*

4.2. The development includes:

- 163 private tenure residential units, delivered in a range of apartment sizes and layouts, including M4(2) and M4(3) compliant homes.
- Residential ancillary uses at ground floor level, including resident amenities and access facilities.
- Extensive public realm and landscape enhancements, including the completion of the Central Gardens with the introduction of the Autumn Garden and a distinctive water feature surrounding the building.
- Basement-level infrastructure, integrating car and cycle parking, refuse storage, and servicing facilities, in line with the sitewide strategy.
- Architectural design that conforms to the approved Design Codes and Parameter Plans, including a curved building form, articulated massing, and a clear top-middle-bottom façade hierarchy.
- Compliance with the Outline Masterplan Consent (ref. 2021/02896/VAR as amended), including alignment with the approved Development Specification, Parameter Plans, and Design Codes.

4.3. The proposed development includes the completion of the sitewide basement strategy, with Plot C1 (Phase 5) forming the final component of the shared basement infrastructure. The Phase 5 basement accommodates:

- 90 car parking spaces, including 5 accessible bays (3% provision), with capacity to increase to 17 accessible bays (10%) if required.
- 294 long-stay cycle parking spaces, including 15 accessible spaces, and 4 short-stay visitor spaces at grade.
- Dedicated refuse and recycling stores for residential and ancillary uses, with managed transfer to the central compaction facility in Phase 1.
- Plant and servicing areas, including water treatment and sprinkler valve rooms.
- Fire-fighting and evacuation infrastructure, including protected lobbies, fire-fighting shafts, and mechanical smoke ventilation systems.



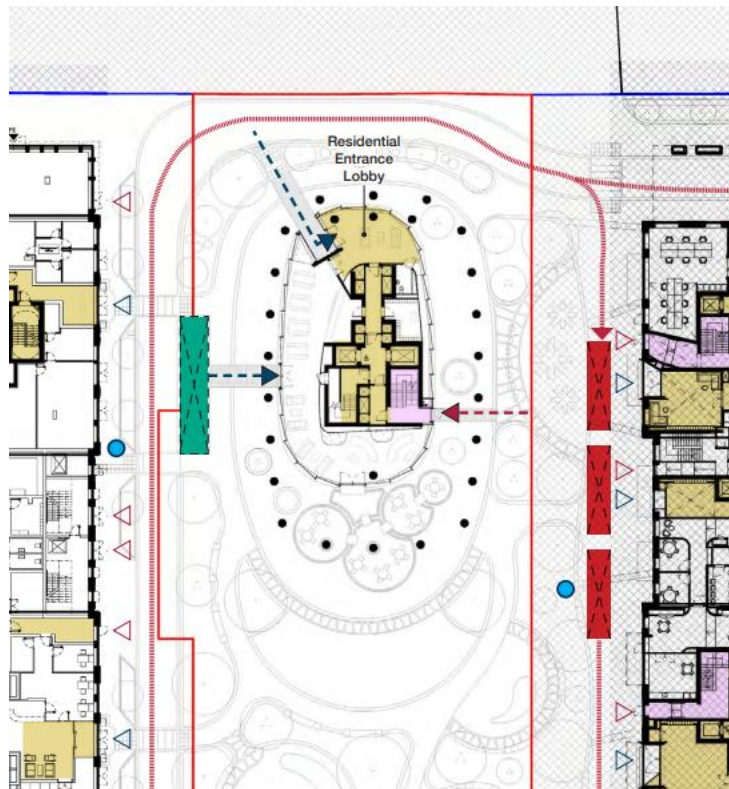
*Figure 3 – Plan showing the masterplan basement as approved. Phase 5 is edged in red*

4.4. Above ground, the building is arranged over 30 storeys, with a rooftop plant enclosure and private amenity terrace. The residential accommodation is configured to provide a mix of 1, 2, 3, 4, and 5-bedroom homes, including:

- 90% of homes designed to M4(2) standards (Accessible and Adaptable Dwellings).
- 10% of homes designed to M4(3) standards (Wheelchair Adaptable Dwellings).

All homes are dual or triple aspect, with no single-aspect units proposed. The number of homes around a core typically varies between 8 and 6. On upper storeys between 1 and 4 dwellings-per-floor are provided. Private amenity is provided to all homes via recessed balconies, projecting balconies, terraces, or rooftop gardens, all meeting or exceeding the Nationally Described Space Standard (NDSS) requirements. The building's layout and vertical circulation strategy includes a central core with two staircases (one fire-fighting shaft and one evacuation stair), Two lifts, including a fire-fighting lift and a dedicated evacuation lift. All corridors and lobbies designed to meet fire safety and accessibility standards.





*Figure 4 – Plan showing ground floor of Plot C1 building. Phase 5 is edged in red*

- 4.5. The proposed building - Plot C1 (Phase 5) would provide a total of 163 homes, with 100% Private Market tenure. The building features a range of apartment types and sizes, including single storey apartments and a two-storey penthouse. Homes are provided in a variety of sizes as following:

1B2P	64 homes
2B4P	84 homes
3B5P	12 homes
4B7P	1 home
4B8P	1 home
5B10P	1 home
<b>Total</b>	<b>163 homes</b>

- 4.6. The building is designed as an “object in the round,” with a distinctive curved form and a rich, gridded façade. Key design features include a tripartite composition of Base, Middle, and Top, with each element articulated through materiality and massing. Proposed materials and colour scheme consist of metallic façade palette contrasting with the masonry tones of surrounding buildings, using bronze and copper hues with gold accents. Sawtooth-profiled infill cladding panels contribute to texture and variation. Bay windows on upper levels provide panoramic views and enhanced daylighting to internal spaces. A “Room in the Garden” concept at ground level incorporates a glazed undercroft, lily-pad terraces, and a surrounding water feature.

- 4.7. The proposed development includes a comprehensive landscape and public realm strategy that completes the northern extent of the 'Central Gardens' and enhances the setting of Plot C1 (Phase 5). The 'Autumn Garden' would complement existing 'Spring Garden' to the south and would feature semi-mature trees and specimens selected for seasonal interest and biodiversity value, amenity and play lawns, pathways, and intimate seating areas.
- 4.8. A water feature surrounding the base of Plot C1 would include a shallow, animated water body with integrated lighting and a cascade edge, "Lily pad" terraces and island planters that extend the internal amenity spaces into the landscape and stepping-stone bridges providing level access to the building entrances.
- 4.9. The "Room in the Garden" concept would integrate the building's ground floor with the landscape through a glazed undercroft space that visually and physically connects interior amenity areas with the surrounding gardens and sculptural columns and a transparent enclosure that elevate the building and enhance permeability. A dynamic lighting strategy would animate this space by night, creating a northern gateway marker.
- 4.10. Hard and soft landscaping design would be consistent with the wider masterplan, with details such as resin-bound gravel paths, granite kerbs, and dry-stone planters, integrated seating, Sheffield cycle stands, and feature lighting. A planting strategy would support pollinators and enhance biodiversity.
- 4.11. Play and amenity space provision would include 310 sqm of dedicated play space for all age groups, informal play opportunities integrated into the landscape and seating, lawns, and spill-out spaces for residents and visitors.
- 4.12. The proposal achieves a standalone Urban Greening Factor (UGF) score of 0.42 for Phase 5, therefore exceeding the London Plan target of 0.4 for residential developments. In addition, extensive green roofs, species-rich lawns, and marginal planting would be provided to support biodiversity and sustainable drainage.
- 4.13. The following documents have been submitted for approval:
- Site Location Plan (prepared by Patel Taylor Architects)
  - Existing and Proposed Plans (prepared by Patel Taylor Architects)
  - Design and Access Statement (prepared by Patel Taylor Architects)
  - Sustainability Statement, Whole Lifecycle Carbon Assessment, Circular Economy Statement, Overheating Assessment and Energy Assessment (prepared by Hodkinson)
  - Daylight and Sunlight Assessment (prepared by eb7)
  - Access Statement (prepared by David Bonnett Associates)
  - Fire Strategy, including Gateway One form and Qualitative Design Review (prepared by Introba)
  - Affordable Housing Summary Report (prepared by St James)
  - Environmental Statement, Transport Assessment, Travel Plan, Delivery and Servicing Plan, Operational Waste Management Strategy, Biodiversity Net Gain Exemption Letter (prepared by Buro Happold)
  - Statement of Community Involvement (prepared by Iceni)
  - Lighting Strategy (prepared by Or light and Vector)
  - Urban Greening Factor Plan (Mudoch Wickham)

- Construction Management Plan (prepared by St James)
- Construction Logistics Plan (prepared by St James)
- Acoustic Planning Report (prepared by RBA)
- Drainage Strategy, including Flood Risk Assessment (prepared by Powell Tolner)
- Wind and Microclimate Assessment (prepared by RWDI) and
- Air Quality Dust Management Plan (prepared by AECOM).

## **5. PUBLICITY AND CONSULTATION**

### **Consultation Responses**

#### **5.1. Greater London Authority (GLA)**

The Mayor of London has responded stating that the proposal raises no new strategic issues and as such has directed that under article 5(2) of the Order above, the Mayor of London does not need to be consulted further on this application and the Council may, therefore, proceed to determine the application without further reference to the GLA. As such should planning permission be granted, this application would not need to be referred to the Mayor of London for Stage 2 prior to the issue of any decision notice.

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

It is acknowledged that the application site, located within Phase 5 of the White City Living development, benefits from excellent public transport accessibility (PTAL 6a) due to its proximity to Wood Lane and White City Underground stations and multiple bus routes. While the proposed trip generation aligns with the previously consented scheme and is not expected to result in material changes to transport impacts, concerns have been raised regarding the overprovision of car parking (0.55 spaces per unit), which exceeds London Plan Policy T6 standards for a high PTAL location. Transport for London (TfL) recommends that the scheme be car-free, except for disabled persons' parking, and that electric vehicle charging infrastructure be provided in line with Policy T6.1(C). Cycle parking provision meets London Plan minimum standards, but further clarity is required on the proportion of two-tier racks and the usability of the northern store. A full Parking Design and Management Plan (PDMP), Construction Logistics Plan (CLP), and Delivery and Servicing Plan (DSP) should be secured by condition. The Travel Plan is acceptable and should be secured, monitored, and funded via the s106 agreement. TfL also recommends coordination with London Underground Infrastructure Protection due to the site's proximity to LU assets.

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

The Health and Safety Executive (HSE), as a statutory consultee under the Planning Gateway One process, reviewed the application and confirmed that it is content with the fire safety design as it relates to land use planning matters. HSE noted that the proposed 30-storey residential building includes appropriate firefighting shafts and multiple stair cores. However, HSE identified several technical matters that should be addressed at later regulatory stages, including extended travel distances, open-plan apartment layouts, means of escape from balconies and cycle stores, and fire safety



considerations related to electric vehicles. While these issues do not affect the current planning determination, HSE advises that the applicant demonstrate compliance with relevant fire safety standards, including BS9991:2024, during subsequent design and building control stages.

#### **5.4. London Underground (LU)/DLR Infrastructure Protection**

LU confirmed in writing that they have no comment to make on this planning application as submitted.

#### **5.5. Thames Water**

Thames Water raised no objection to the proposed development in relation to water supply infrastructure but requested several conditions and informatives be attached to any planning permission. Thames Water also requested a piling method statement due to the site's proximity to strategic sewers and advised that petrol/oil interceptors be installed in car parking areas. Concerns were raised regarding the lack of clarity in the drainage strategy, specifically whether foul water will be discharged via gravity or pumped. Thames Water also advised that the development should incorporate protection against sewer flooding and avoid construction within 3 metres of water mains or underground assets.

#### **5.6. Active Travel England**

Active Travel England confirmed they will not be submitting detailed comments on this planning application as submitted.

#### **5.7. Airport Safeguarding**

Airport Safeguarding authority has confirmed that it has no safeguarding objections to the proposed development. However, it advises that if a crane is required during construction, and it exceeds 100 metres in height, the crane operator should notify the Civil Aviation Authority (CAA) and the Defence Geographic Centre in advance. Notification should include the crane's precise location, maximum height, and the start and completion dates, in accordance with CAA guidance on crane notification procedures.

#### **5.8. Historic England**

Historic England has confirmed that it is not offering advice on this application, noting that this should not be interpreted as a comment on the merits of the proposals. The local planning authority is advised to seek the views of its specialist conservation and archaeological advisers. Historic England requests not to be reconsulted unless there are material changes to the proposals and notes that its response relates only to designated heritage assets. For archaeological matters, the Greater London Archaeological Advisory Service (GLAAS) should be consulted if the proposals meet their published criteria.

## **Residents and Amenity Groups**

- 5.9. Neighbour notification letters were sent to 1,781 properties. Additionally, a site notice was posted on 4 December 2024, and a press advert was also published on 4 December.
- 5.10. A total of five objections were received from local residents. The contents of the representations received are summarised below.
- 5.11. In terms of concerns relating to transport and highways, objections were raised to the level of car parking proposed, which is considered to exceed the maximum standards set out in local and regional policy and that additional parking will exacerbate existing congestion on Wood Lane and Ariel Way, impacting bus services, pedestrian safety, and cycle routes. Further concerns were raised that the submitted Transport Assessment is lacking reference to relevant policy and not including a Healthy Streets or Active Travel Zone assessment. Requests were made for the Council to clarify how the development will contribute to active travel improvements and how White City Regeneration Area funds will be used to mitigate highway impacts.
- 5.12. In terms of height, scale and design, objections were raised to the proposed 30-storey height which is considered out of character within the surrounding low-rise context and conservation area. Concerns were raised that tall buildings erode community cohesion, block daylight, and negatively affect mental well-being. Comments were made that high densities can be achieved through mid-rise development and that towers are driven by developer profit rather than community need. Specific reference was made to overshadowing of nearby heritage assets, including the BBC Television Centre and Hammersmith Park.
- 5.13. Concerns were raised that the development will worsen air pollution, noise, and traffic congestion in an already busy area with increased delivery traffic, e-scooter use, and lack of supporting infrastructure such as affordable shops, pharmacies, and community facilities. Objections were raised to the loss of daylight and privacy, particularly for residents in nearby buildings such as Newall Court. Calls for more green space, trees, and biodiversity-enhancing features to mitigate the urban heat island effect and improve local well-being.
- 5.14. In some representations the Council was requested to consider the long-term environmental and social impacts of the development, including its effect on future generations and to consider more “person-centred” approach to planning that prioritises community needs, environmental sustainability, and quality of life over density and profit.

## **Public Engagement**

- 5.15. A Statement of Community Involvement (SCI) prepared by Iceni dated August 2024 has been submitted in support of the application. The submitted SCI outlines the public engagement undertaken by the applicant, St James, in relation to the proposed development of Plot C1 (Phase 5) of the White City Living masterplan. The consultation period ran from 8th to 28th July 2024 and included the following activities:

- 5.16. Community Newsletter: A four-page A4 newsletter was distributed via Royal Mail to 3,603 local homes and businesses. The newsletter provided a site-wide update, information on a community summer fair, employment and training opportunities, and a planning update on the Phase 5 proposals. It explained that the Drop-In Planning Application aligns with the Outline Planning Consent (ref: 2023/01965/VAR), with no changes to the total number of homes (2,030), building heights, parking provision, phasing, or environmental impacts. Clear annotations were used to highlight proposed changes, and contact details were provided for feedback via email and phone.
- 5.17. Stakeholder Engagement: Emails were sent to local ward councillors (College Park & Old Oak, Shepherd's Bush Green, Wormholt), the MP for Hammersmith, local residents' associations, the Hammersmith Society, and key stakeholders including TfL, Westfield, and Imperial College London. A copy of the newsletter was included in all correspondence.
- 5.18. Two responses were received: One from a local resident expressing concern about building proximity, and one from the MP for Hammersmith, requesting clarification on the number of homes, tenure, and accommodation mix.
- 5.19. The submitted SCI concludes that the applicant has actively engaged with the local community and key stakeholders and remains committed to ongoing dialogue throughout the planning process.

## **6. Environmental Impact Assessment**

- 6.1. The White City Living development falls within Part 10 (b) (Infrastructure Projects – Urban Development Projects) of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulation 2017. Phase 5, which is the subject of the current application, would fall within the schedule 2 criteria as the development includes more than 150 dwellings. However, it would have been unlikely to have required an Environmental Statement as a standalone development given that the surrounding area is heavily urbanised.
- 6.2. An Environmental Statement (ES) addendum has been submitted by the applicant. The ES addendum has been presented as an update to the previous site-wide ES reporting to avoid artificially segmenting the development.
- 6.3. Case law has established that development sites must be considered in their entirety when determining whether or not they constitute EIA development. The principle of segmenting or 'salami slicing' refers to the practice of dividing a single, larger project into smaller, seemingly independent parts which would avoid triggering the relevant EIA thresholds. Courts have held that where project components are functionally or physically interdependent—such as infrastructure built to serve a development - they must be assessed together as one project. The Courts interpretation of the EIA Regulations (2017) has most recently been reaffirmed in *Ashchurch Rural Parish Council v Tewkesbury Borough Council [2023]*. The Courts ruled that dividing functionally interdependent parts of a development for the purposes of EIA is unlawful and that the environmental impacts of the whole development must be considered cumulatively.

- 6.4. The application site, referred to as Phase 5, was designed as part of the White City Living masterplan. The site delivers roads, outdoor spaces and landscaping that is functionally interdependent to the masterplan development. Vehicular access to the site can only be achieved through the masterplan site. Phase 5 cannot be considered in isolation from the Masterplan for the purposes of EIA.
- 6.5. The approach adopted by the applicant, in preparing an ES addendum to the Masterplan ES, is therefore considered to be sound and consistent with the Courts interpretation of the EIA Regulations (2017).
- 6.6. As established above, the original Masterplan development was subject to an EIA due to the scale of the proposals and the potential for significant environmental effects to occur. The Environmental Impact Assessment (EIA) comprised an Environmental Statement (ES) which was submitted with the planning application (the 2014 ES). The amendments made in 2015 (subject to the original but revised development scheme) were further supported by additional environmental information in the form of an ES Addendum (the 2015 ES Addendum).
- 6.7. Further amendments were made to the consented scheme, through a planning application to vary the proposals for Phase 1 in 2016. An ES Statement of Conformity (the 2016 ES Statement of Conformity) was prepared and submitted with the planning application (ref: 2016/03907/VAR) prior to a permission being granted. It concluded that the amendments to the proposed development would not lead to any previously unidentified significant environmental effects and that the conclusions of the 2014 ES and 2015 ES Addendum remained valid.
- 6.8. An application was approved in July 2018 which (ref: 2017/04377/VAR) varied conditions 1-8 of the planning permission for 2016/03907/VAR, and sought amendments to the approved parameter plans, development specifications, and parameter reports to allow for alterations to horizontal and vertical parameters. This, in turn, revised the maximum allowable residential units and floorspace on site. An ES Addendum (the 2017 ES Addendum) was prepared in support of this application which concluded that all environmental effects, and their significance, for the proposed development reported within the 2014 ES, and as updated by the 2015 ES Addendum, remained unchanged. This was except for several effects which saw minor increases and decreases in effect significances. No new significant effects were predicted except for the interactive effect of air quality and noise on Wood Lane residents and Imperial College Block C, which would be temporarily significant due to traffic noise.
- 6.9. Since the 2017 ES Addendum was completed, there have been changes to the cumulative developments in the surrounding area in addition to further non-material amendment applications at White City Living. Specified Non-Material Amendment applications included ES Statements of Conformity and Addenda which identified that there were no changes to the conclusions in the previous ES and Addenda.

- 6.10. A further application was approved in September 2022 (ref: 2021/02896/VAR) which varied conditions 3, 4, 7 and 8 of the masterplan consent. An ES addendum (the 2021 ES Addendum) was prepared to support this application. The Addendum identified one previously unidentified significant environmental impact relating to operational traffic noise 15 years post full build out. This had previously been assessed to be negligible and was increased to moderate to minor adverse.
- 6.11. An application to vary conditions 3, 4 and 8 of the extant permission, (ref. 2021/02896/VAR) was approved in August 2024 (ref. 2023/01965/VAR). An ES Statement of Conformity was prepared which concluded that environmental effects, and their significance, for the proposed development remained as reported within the 2021 ES and its predecessors where relevant.
- 6.12. The current application does not seek any changes to the approved Masterplan with Phase 5 having previously benefited from outline consent (ref. 2023/01965/VAR). However, the applicant was unable to achieve the reserved matters submission deadline set within condition 2 of the outline consent. Condition 2 required applications for approval of reserved matters pursuant to Plot C1 (i.e. Phase 5) before the expiration of 7 years from 16th December 2015 - so by 16th December 2022. The applicant has therefore submitted a 'drop in' application for full planning permission for Phase 5/Plot C1 to allow the Masterplan to be delivered in its entirety.
- 6.13. The ES Addendum includes a review of cumulative schemes that have come forward since the 2023 Statement of Conformity. It concludes that the cumulative effects remain unchanged and that the proposed development does not give rise to any new or significant cumulative impacts.
- 6.14. The ES Addendum confirms that
- All residual environmental effects previously predicted within the 2021 ES Addendum and subsequent 2023 ES Statement of Conformity remain valid and unchanged
  - The only exception is wind microclimate, where updated modelling based on the detailed design of Phase 5 has identified marginal improvements in pedestrian comfort levels due to the inclusion of landscaping and mitigation measures.
  - No further supplementary mitigation is required beyond that already embedded in the design.
- 6.15. The ES Addendum has been reviewed by the Council's Environmental Policy, Land Contamination, Environmental and Highways Officers who have raised no objections to the contents of the report, subject to the imposition of planning conditions. The Environmental Statement (2014), the subsequent Environmental Statement Addendums and Statements of Conformity (between 2015-2023) and the submitted further information to the Environmental Statement and their various technical assessments together with the consultation responses received from statutory consultees and other stakeholders and parties, enable the Council to determine this application with knowledge of the likely significant environmental impacts of the proposed development.

## **7. Planning Policy Framework**

- 7.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise.
- 7.2. 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.
- 7.3. 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).
- 7.4. 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). A number of strategic and local supplementary planning guidance and other documents are also material to the determination of the application.

### **National Planning Policy Framework (2024)**

- 7.5. 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)**

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

### **LBHF Local Plan (2018)**

- 7.7. The Council Local Plan was adopted on 28 February 2018. The policies in the Local Plan together with the London Plan make up the statutory development plan for the borough. The Planning Guidance Supplementary Planning Document (SPD) (February 2018) and Affordable Workspace SPD (October 2022) are also a material consideration in determining planning applications.

## **8. Planning Considerations**

8.1. The main considerations material to the assessment of this application have been summarised as follows:

- Principle of development and land use
- Design and heritage
- Residential amenity
- Highways
- Environmental considerations
- Accessibility

## **9. Principle of Development and Land Use**

### **Outline Consent and Expiration of RMA Deadline**

- 9.1. The application site lies within the wider White City Living masterplan development site. The application site accommodates Phase 5 of the masterplan, which comprises Plot C1 and a large area of outdoor amenity space. The masterplan site was granted outline planning permission on 16 December 2015, for the demolition of existing buildings and structures and redevelopment of the Site for residential and mixed uses under reference 2014/04726/OUT subject to various conditions including deadlines for approval of reserved matters.
- 9.2. Condition 2(iii) of the outline consent required the reserved matters for Plot C1 (Phase 5) to be submitted to the Council before the expiration of 7 years from the date of the permission (i.e. by 15 December 2022). Condition 2(iii) further required development to be commenced within Plot C1 within 2 years of the approval of the last of the reserved matters approvals (RMA) for Plot C1. The RMA for Plot C1 was not submitted before the deadline December 2022. The outline consent has been subject to various amendments as detailed within the Planning History section of this report.
- 9.3. The developer wished to continue to build out Phase 5/Plot C1 to allow for completion of the masterplan, in line with the outline consent. However, as the relevant time limit condition – Condition 2(iii) – could no longer be complied with, an application for reserved matters approval could no longer be accepted. Furthermore, the Town and Country Planning Act 1990 (as amended) explicitly prohibits the approval of applications under s73 that would have the effect of extending the time within which an application for reserved matters approval must be made. The relevant provision is contained within section 73, subsection 5 of the TCPA 1990 (as amended).
- 9.4. LBHF legal services sought King's Counsel (KC) opinion to establish if (a) an application could be approved under s96a that would have the effect of extending the time within which an RMA application must be made; and (b) whether a drop-in application could alternately be used to grant full planning permission for Phase 5/Plot C1.
- 9.5. Regarding the use of an application under s96a, commonly referred to as an application for a 'non-material amendment', the advice in Counsel's opinion confirmed that such an application could not be used to vary Condition 2(iii) and extend the RMA deadline. The effect of granting such an amendment would be to allow for Plot C1 to be developed under the outline consent, where the current outline consent no longer

allows for Plot C1 to come forward. Plot C1 would not be considered immaterial in the context of the outline consent as a whole and therefore the amendment sought could not be considered non-material.

- 9.6. Counsel advised that a drop-in application for full planning permission could be an appropriate legal remedy to allow for the delivery of Plot C1, and therefore the final phase of the masterplan, to be brought forward. Such an application would need to be consistent with the approved outline consent, so as not to render it physically impossible to build out the remainder of the masterplan development.
- 9.7. The current application has been prepared as a drop-in application for full planning permission. The proposals within the application are consistent with the approved masterplan (as amended) and would not render any part of the wider development unimplementable. Officers are therefore satisfied that the use of a drop in application, in this instance, is procedurally acceptable and an appropriate mechanism to allow for the delivery of the final phase of the masterplan development.

## Land Use

- 9.8. **NPPF (2024) 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.”
- 9.9. **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:
- 9.10. **Policy GG2** states that to create successful sustainable mixed-use places which make the best use of land.
- 9.11. **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.
- 9.12. **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.

- 9.13. **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.
- 9.14. **Local Plan (2018) 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.
- 9.15. 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.
- 9.16. The application seeks permission for the delivery of a wholly residential building (Plot C1) and associated resident's amenity space, car parking and cycle parking. The principle of residential development at this site was established through the granting of outline consent for the White City Living masterplan (ref. 2014/04726/OUT). Phases 1 – 3 of the development have been completed and work on Phase 4 is due to lawfully commence imminently. Plot C1 comprised the fifth, and final, phase of the masterplan development. The current application does not seek to intensify the development, nor does it seek any other changes to the approved masterplan. It seeks only to rectify the departure from Condition 2(iii) as described in para. 9.1 – 9.7 above and provide a mechanism to allow for this phase to be brought forward and delivered. It is considered that the principle of residential development at the site has been well established through the implementation of the earlier phases of the masterplan. The delivery of Phase 5/Plot C1 would allow for the full benefits of the masterplan, as approved, to be realised and would help meet the local identified housing need. The proposed land use is therefore considered acceptable in principle and in accordance with Policies GG2, GG4, SD1 and H1 of the London Plan (2021). Policies HO1, WCRA and WCRA1 of the Local Plan (2018) and the White City Opportunity Area Planning Framework (2013).
- 9.17. A residents' bar is proposed to the ground floor of Building C1 which is described within the supporting documents as being a residential amenity space, rather than a commercial use. There is no objection in principle to this, noting that the scheme does provide a comprehensive mix of amenities for residents. However, a condition will be attached to this consent to prevent the residents' bar being used in a manner that is not ancillary to the residential use of the building.

## Affordable Housing

- 9.18. **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.
- 9.19. **London Plan Policy H4** sets a strategic target of 50% of all new homes to be genuinely affordable. **Policy H5** provides for the 'threshold' approach to affordable housing, setting a requirement of 35% of new homes to be affordable subject to the development's compliance with all other relevant policies.
- 9.20. **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.
- 9.21. The masterplan consent has secured the delivery of 492 on-site affordable homes which is equivalent to 24% of all units. 427 (87%) of these affordable units have been completed within Phase 2 and the remaining 65 affordable units will be delivered within Phase 4.
- 9.22. A payment in lieu was secured against the Masterplan consent to contribute towards the funding and delivery of off-site affordable housing. The contribution secured totalled £34.5m and has been paid in full by the developer.
- 9.23. The current drop-in application does not propose any additional residential units. The viability assessment undertaken as part of the masterplan consent, and its subsequent amendments, were inclusive of the 163 units to be delivered within Phase 5/Plot C1. Nonetheless, it was considered pertinent to undertake a further review of the viability of Phase 5, to establish whether there had been any changes to the previously agreed viability inputs.
- 9.24. The Council instructed BPS Chartered Surveyors to undertake a review of the financial viability assessment (FVA) submitted by the developer. The scope of BPS's work comprised a review of the cost and value inputs within the Phase 5 appraisal to determine whether the scheme could viably make any additional affordable housing contributions. A number of site-wide inputs have previously been agreed in the assessment of the masterplan applications and were therefore not revisited in BPS's assessment. This includes the benchmark land value (£100,000,000) and target IRR (15%).
- 9.25. The developer provided an updated build cost plan for Phase 5 which was reviewed by a cost consultant appointed by BPS. The cost consultant concluded that the costs broadly appeared to be appropriate and in line with current BCIS data results.
- 9.26. The developer's FVA calculated expected sales values at Phase 5 to be marginally higher than achieved values at Phase 3 of White City Living. The earlier phases of WCL provide a robust comparable for expected sales values in Phase 5 and thus the assumptions made by the developer were considered appropriate by BPS.
- 9.27. The BPS review concluded that Phase 5 would run an IRR deficit of -6.23%, against the agreed IRR of 15%. On that basis, BPS concluded that the scheme could not viably support any further contribution towards the delivery of affordable housing.

BPS further undertook a sensitivity analysis to establish if the viability could be expected to improve should there be changes to sales values or construction costs. The sensitivity testing demonstrated that, even with an 80% improvement in private market sales values and an 80% reduction in build costs, the scheme still could not viably support an additional contribution towards affordable housing.

- 9.28. Officers have considered the advice provided by BPS regarding the viability of the scheme and are satisfied that the scheme cannot feasibly support any further contribution to affordable housing. On-site provision has been secured by the masterplan consent and included a payment in lieu, towards the delivery of offsite affordable housing paid in full by the developer. Viability testing for the masterplan development included Phase 5. Accordingly, the affordable provision already secured can be considered to cover the policy requirements arising from Phase 5. The on-site affordable units will be delivered prior to the first occupation of Phase 5/Plot C1 within Phases 2 and 4. The overall affordable provision, when both onsite and offsite contributions are considered cumulatively, have been reported as 35% in the assessment of the masterplan consent, most recently in ref. 2021/02896/VAR. It is therefore considered that the affordable housing provision is in accordance with the overarching aims of the NPPF, Policy H4 of the London Plan and Policy HO3 of the Local Plan.

### Housing Mix

- 9.29. **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.
- 9.30. **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.
- 9.31. **Local Plan Policy HO5** (Housing Mix) sets out the housing mix which developments should aim to meet. Market housing should propose a mix of unit sizes including larger family accommodation.
- 9.32. Phase 5/Plot C1 comprises only of market housing and thus policy seeks a balanced mix of sizes, including family sized units, rather than a prescriptive target. As show in the table below, Plot C1 would provide a mix of smaller sized units with 15 family sized units. The housing mix is therefore considered to be in accordance with the requirements of Policy HO5 of the Local Plan and H10 of the London Plan.

Type	Quantum	Percentage
1 bed	64	39%
2 beds	84	52%
3 beds	12	7%
4 beds	3	2%

## **Employment and Skills**

- 9.33. **Local Plan Policy E4** requires the provision of appropriate employment and training initiatives for local people of all abilities in the construction of major developments including visitor accommodation and facilities.
- 9.34. A comprehensive package of employment, skills and training obligations have been secured under the masterplan consent. This includes initiatives to cover the demolition, construction and operational phases. A financial contribution of £1m was secured towards the provision of workplace co-ordinators, vocational training, local business engagement and consultation. This was paid by the developer as part of the White City Opportunity Area Fund (WCOAF). The contribution was ringfenced within the masterplan legal agreement to be spent only on the aforementioned initiatives.
- 9.35. The masterplan legal agreement further secured the submission of a jobs, employment and training strategy (JEBS) for construction and operational jobs at the site. The developer has submitted a JEBS for each phase as they commenced and engage with the Council to provide relevant data to monitor compliance with the strategy. The developer will be required to submit a strategy specific to Phase 5.
- 9.36. The masterplan legal agreement further secures 55 apprenticeships and 40 trainees during the construction phase, for a period of ten years following the commencement of Phase 2. Should the developer be unable to provide the total quantum of apprenticeships and trainees then a payment of £1,500 will be due for each vacancy upon practical completion.
- 9.37. The original outline masterplan consent was granted in 2015 and the borough's initiatives and priorities in relation to employment and skills have shifted to meet current needs. Officers acknowledge the practical difficulties that would be presented if the JEBS requirements and on-site apprenticeship and training provisions were amended for Phase 5 – noting that it is the final phase of the masterplan development. Funding remains available via the WCOAF masterplan contribution which could be used to fund initiatives in line with the current needs of the borough's residents.
- 9.38. Subject to compliance with the remaining employment and skills obligations, it is considered the proposal would be in accordance with Policy E4 of the Local Plan.

## **10. 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).
- 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.

### **Dual Aspect**

- 10.5. Policy D6 of the London Plan requires that developments maximise the number of dual-aspect units. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Policy D3 (optimising site capacity through the design led approach).
- 10.6. All units within Plot C1 will benefit from at least two aspects, although in some instances this is achieved through secondary views onto a balcony. Most units, however, would benefit from a true dual aspect as defined by the London Plan. Where single aspect units, with secondary aspects onto balconies, are proposed, the units are not north facing and could still achieve cross-ventilation in the primary living spaces. The proposed layout is therefore considered to be in accordance with the aims of Policy D6 and would afford an acceptable standard of accommodation.

### **Amenity Space**

- 10.7. **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.
- 10.8. **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.
- 10.9. Each unit will have access to at least one private balcony or terrace. Balconies servicing one-bed units are a minimum of 5sqm and two-bed units are served by balconies of at least 7sqm. The private amenity space provided for each unit size does accord with the London Plan space standard. The larger, family sized units would again benefit from private amenity space but would not achieve the standard set in Key Principle HS1. However, the provision would meet or exceed that required by London Plan Policy D6 and residents would also benefit from access to the

various large open spaces that are provided as part of the development including play areas for children. Therefore, on balance, the amenity provision is considered acceptable.

### **Unit Sizes**

- 10.10. All units would meet or exceed the minimum space standards set in Policy D6 of the London Plan, which are consistent with the Nationally Described Space Standards.

### **Daylight and Sunlight**

- 10.11. **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.
- 10.12. Daylight and sunlight to proposed dwellings is assessed against Building Research Establishment's (BRE) guidance 'Site layout planning for daylight and sunlight: A guide to good practice' (BRE 209 3rd edition, 2022), which in turn references the British Standard BS EN17037:2018 'Daylight in buildings'. The 2022 update introduced a new method of assessment for internal daylight and sunlight amenity within new developments. These standards are generally considered more rigorous than those within the previous 2011 edition of the guidance.
- 10.13. A daylight and sunlight assessment has been submitted in support of the application to demonstrate the natural lighting that would be achieved within each home. The masterplan scheme was assessed under the superseded 2011 BRE guidance. The daylight and sunlight assessment therefore provides an assessment of Plot C1 under both the 2022 and 2011 methodology to allow for a comparison of the standards achieved across the wider masterplan. The model used for the assessment includes consented developments in the vicinity of the site, including Imperial Campus South which is to the immediate north of Plot C1.
- 10.14. The assessment shows that 188 out of 450 habitable rooms will achieve the daylight illuminance target. Units to the lower floors would suffer from the lowest compliance with the daylight illuminance target with compliance generally improving at higher floors. One-bedroom units at lower floors see particularly poor compliance with the daylight illuminance target with a number of units having no floorspace that would achieve compliance with the target lux. The scheme does perform better when assessed against the 2011 BRE criteria with 294 of 450 rooms (65%) achieving the requisite average daylight factor target. Other plots across the masterplan achieved a similar level of compliance, ranging between 65% - 84%.
- 10.15. The site is within an opportunity area where high density development within clusters of tall buildings does restrict the ability of residential units to achieve compliance with the relevant BRE criteria. The NPPF is clear that a rigid application of daylight and sunlight guidance should be avoided where an otherwise good standard of accommodation would be provided. The units are generously sized, with

private amenity space and good, functional layouts. Having regard to the otherwise good standard of accommodation, and the site context and nature of the development, it is considered that the daylighting results can be accepted. Regard is also given to the higher standards of compliance with the 2011 BRE guidance, noting that the scheme was originally designed to achieve the now superseded ADF targets.

- 10.16. With regard to sunlight, 65 of the 163 units would achieve compliance with the BRE standard. The current BRE guidance sets a target for each dwelling to achieve 1.5 hours of direct sunlight on March 21<sup>st</sup>, ideally within the main living room. Units to the lower floors, and those without a direct southern aspect, perform poorly against this metric. Compliance with the 2011 BRE APSP test is similarly poor. However, it is again considered that this standard of compliance is largely unavoidable at this site, given the particularly high density of development surrounding Plot C1. Options to improve both daylight and sunlight compliance have been explored by the developer but ultimately considered unfeasible. Increased areas of glazing are reported within the daylight and sunlight assessment to result in overheating and unacceptable levels of noise penetration. It is accepted that the site is heavily constrained by virtue of the scale of development in the immediate vicinity, including consented but not yet implemented schemes.
- 10.17. The proposed amenity spaces within Phase 5 have been assessed against the Sunlight Amenity test which evaluates the proportion of open space receiving at least two hours of direct sunlight on 21st March. The assessment confirms that the amenity provision meets the BRE target, with at least 50% of the area receiving the required sunlight exposure. While some areas show a slight reduction in compliance compared to previous assessments, this is primarily attributed to the cumulative impact of neighbouring consented developments, such as the Westfield Block C scheme, rather than the proposed Building 10 itself. Notably, the central courtyard (Area A05) would achieve full compliance in the absence of the updated Westfield scheme, and Area A06 continues to perform strongly with 92.6% of its area sunlit. Overall, the proposed development maintains a high standard of sunlight access to its outdoor spaces, ensuring a good level of amenity for future residents.

### **Outlook and privacy**

- 10.18. Building C1 is within a high-density urban development which by its nature is defined by having some degree of mutual overlooking. The eastern façade is set back approx. 11.6m from Building B1 (Phase 2) at its nearest point, and the western façade is set back approx. 10.9m from Building D1 (Phase 4). The floorplans have been designed to mitigate against both perceived and actual overlooking as far as can feasibly be achieved within a high-density scheme. The northern façade would be set back approx. 18m from the southern façade of the residential blocks proposed within the ICL South development to the immediate north of the site. This is considered to be an appropriate distance within an urban environment that would allow for an adequate level of privacy for residents of each development. On balance, officers consider that the level of mutual overlooking and privacy would be appropriate in a high-density urban development and the proposal is therefore broadly consistent with the aims of Policy DC2, DC3 and HO11 of the Local Plan.
- 10.19. In line with the assessment provided above, it is considered that the standard of accommodation that would be afforded to future residents would be acceptable

and largely meet or exceed the minimum requirements set in the London Plan and Local Plan. The proposals are therefore in accordance with Policy DC2, DC3 and HO11 of the Local Plan and Policy D6 and HO4 and the London Plan.

## **11. Design, Heritage and Townscape**

### **Design**

- 11.1. The NPPF seeks to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. The NPPF also requires that proposals should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.
- 11.2. **Chapter 3 (Design) of the London Plan 2021** seeks to secure the delivery of good design through a variety of ways. Policies D3 (Optimising Site Capacity through the Design-Led Approach), D4 (Delivering Good Design), D8 (Public Realm) and D9 (Tall Buildings) are particularly relevant to the consideration of this application.
- 11.3. **Policy D3** highlights that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, through careful consideration of issues such as form and layout, experience, alongside consideration of quality and character.
- 11.4. **Policy D4** highlights that where appropriate, visual, environmental and movement modelling / assessments should be undertaken to analyse potential design options for an area, site, or development proposal.
- 11.5. **Policy D8** sets out criteria to ensure that the public realm is well-designed, safe, accessible, inclusive, attractive and well-connected.
- 11.6. **Policy D9** requires local authorities to establish appropriate locations for tall building development and provides a framework for assessing the impacts of tall buildings to ensure that, among other things, they reinforce the spatial hierarchy of their context, are of exemplary architectural quality and take account of the significance of London's heritage assets and their settings.
- 11.7. **Local Plan (2018) Policies DC1, DC2 and DC3** are relevant to the assessment of design.
- 11.8. **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.
- 11.9. **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.
- 11.10. **Policy DC3 (Tall Buildings)** identifies areas within the borough where tall buildings may be appropriate and seeks to ensure, among other things, that tall buildings have a positive relationship to the surrounding townscape context, are of the highest quality of architectural design and materials, have an acceptable impact



on the skyline, have regard to the significance of heritage assets and respect the principles of accessible and inclusive design.

- 11.11. The proposed detailed design described in this drop-in application has been developed in compliance with Design Codes approved in planning consent 2014/04726/OUT and subsequently amended by planning consent 2021/02896/VAR. It has been subject to design review and scrutiny by LPA officers and the GLA during the pre-application stages.
- 11.12. The proposed scheme is an appropriate response to the Design Codes and other control documents and would complement the remainder of the White City Living masterplan. It would achieve a good standard of design that responds to its place as a “marker” building, being composed with a clear base, middle and top and with a façade characterised by a framework of bronze-colour ribs and inset copper-colour metal cladding panels. By virtue of its compliance with the approved outline consent Design Codes, it is considered to be in accordance with the NPPF; London Plan Policies D3, D4, D8, D9, and Local Plan Policies DC1, DC2 and DC3.

### **Built Heritage, Views and Townscape**

- 11.13. **Section 66(1) and Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990** states that when considering whether to grant planning permission for development which affects a listed building or its setting, or buildings or land in conservation areas, the LPA shall have special regard to the desirability of preserving the building or its setting, or the desirability of preserving or enhancing the character or appearance of that area. In this context, "preserving" means doing no harm.
- 11.14. **Paragraph 215 of the National Planning Policy Framework (2024)** states that where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, such harm should be weighed against the public benefits of the proposal.
- 11.15. **London Plan Policy HC1 (Heritage Conservation and Growth)** states, among other things, that development proposals affecting heritage assets and their settings should conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings.
- 11.16. **Policy DC8 (Heritage and Conservation)** states that the council will conserve the significance of the borough's historic environment by protecting, restoring and enhancing its heritage assets.
- 11.17. Revisions to the proposed vertical and horizontal parameters of Phases 4 and 5 were approved by planning consent (ref: 2021/02896/VAR), with further revisions to the vertical and horizontal parameters of Phase 4 by planning consent (ref: 2023/01965/VAR). The built heritage, views and townscape impacts of these revisions were assessed in ES Addenda Built Heritage, Townscape Character and Visual Impact Assessments (HTVIA) and it was considered that the revisions did not materially change the previous conclusions that the development, as a whole would, in overall heritage terms, enhance the built heritage and townscape of the area and would not result in additional harm to heritage assets beyond what had been previously identified and considered, on balance, to be acceptable.

11.18. The detailed proposals for Phase 5 comply with approved vertical and horizontal development parameters in planning consent (ref: 2023/01965/VAR) and therefore would give rise to no additional THVIA impacts. The proposals are considered to be in accordance with Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposals are also considered to be in accordance with the NPPF, London Plan Policy HC1 and Local Plan Policies DC1 and DC8.

## **12. Landscaping, Open Space, Biodiversity and Play Space**

- 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.

### **Biodiversity and Ecology**

- 12.4. Changes to the Environment Act 2021 introduced a mandatory 10% Biodiversity Net Gain (BNG) target for planning applications submitted from Monday 12 February 2024. This application was submitted after the relevant date; however, it is inextricably linked to the delivery of the Masterplan that was approved in December 2015 (ref: 2014/04726/OUT). The application site, when considered in isolation, is exempt from the mandatory BNG assessment as it does not impact any on-site priority habitat and the impact on the non-priority habitat on site is less than 25sqm.

The wider Masterplan site has not been subject to a mandatory BNG assessment as this consent pre-dates the introduction of the requirement.

- 12.5. The application includes an Urban Greening Factor (UGF) plan to demonstrate compliance with **Policy G5 (Urban Greening)** of the London Plan. Policy G5 sets a target UGF score of 0.4 for predominantly residential developments and a lower score of 0.3 commercial schemes. The UGF score is calculated by assigning weighted values to various surface cover types – for example green roofs, grassland or planted areas. Surfaces are assigned a higher value where they offer greater environmental and ecological benefits such as improved rainwater infiltration and enhanced biodiversity.
- 12.6. The site area of Phase 5, when assessed in isolation, achieves a UGF score of 0.42 thus exceeding the Policy G5 target score for residential developments. The site will deliver areas of semi-natural vegetation, an extensive green roof, flower rich perennial and groundcover planting and amenity grassland. The scheme will therefore contribute positively towards the enhancement of biodiversity and ecology at a previously developed site. The proposals are therefore in accordance with Policy G5 of the London Plan.

### **Play Space**

- 12.7. **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.
- 12.8. The play space requirement, across the entirety of the Masterplan has previously been calculated as 4,101sqm. This figure incorporates the child yield arising from all subsequent amendments to the original outline consent whereby the quantum of residential units was increased. The figure is inclusive of the provision required for Phase 5 to meet the requirements of Policy S4. Provision for play space across the site will be made within publicly accessible open spaces. The majority of the consented play space is within Phase 1, which has been completed, and Phase 3 with completion imminent. The remaining play space is to be delivered within the Phase 5 application site and will comprise a minimum area of 310sqm. Full details of the Phase 5 play provision will be secured by way of condition. This will require the delivery of the final quantum of play space prior to first occupation of any residential unit within Phase 5. It is noted that there is ample open space within the application boundary to deliver the requisite quantum of play space. The proposal is therefore considered to be in accordance with Policy S4 of the London Plan and Policy OS3 of the Local Plan, subject to a condition.

### **Open Space**

- 12.9. The White City Living development is structured around a series of interconnected landscape character areas, with Phase 5 (Plot C1) completing the northern end of the Central Gardens. Phase 5 will deliver the Autumn Garden, a continuation of the Central Gardens, which includes amenity lawns, seasonal planting, and accessible pathways. A reflective water feature surrounds the base of the building, incorporating island terraces and marginal planting to enhance visual interest and biodiversity.
- 12.10. The landscape design for Phase 5 integrates with the wider masterplan through

consistent use of materials, planting palettes, and street furniture. It provides a mix of formal and informal spaces, including play areas for different age groups, seating, and areas for social interaction.

- 12.11. The open space across the masterplan site is publicly accessible, including all play space delivered across the various phases. This has been secured by way of the legal agreement pursuant to the outline masterplan consent and all open space within Phase 5 will similarly be subject to this obligation.
- 12.12. The open space within Phase 5 of White City Living is designed to be publicly accessible, inclusive, and integrated with the wider masterplan. It provides a high-quality public realm that supports recreation, social interaction, and biodiversity, while enhancing pedestrian connectivity across the site and to surrounding developments. The open space provided within Phase 5 is therefore considered to positively contribute towards the delivery of genuinely usable open space within the borough and is in line with the aims of Policy OS1 of the Local Plan.

### **13. Amenity Impacts**

- 13.1. **Local Plan Policy HO11** addresses detailed residential standards and, in seeking a high standard of design, seeks to ensure the protection of existing residential amenities; 'including issues such as loss of daylight, sunlight, privacy and outlook'. Local Plan **Policy DC2** states that all new builds must be designed to respect good neighbourliness and the principles of residential amenity.
- 13.2. **Paragraph 130 (c) 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.

#### **Daylight and Sunlight, Privacy and Overlooking**

- 13.2.1. **The BRE Guidelines** are typically used to assess daylight and sunlight. The Guideline sets out methods for assessing daylight into a room including the Vertical Sky Component (VSC) method and plotting of the no-skyline method. The introduction to the guide however stresses that it should not be used as an instrument of planning policy and should be interpreted flexibly because lighting is only one design factor for any scheme. Sunlight assessment is based on annual probable sunlight hours (APSH) and winter sunlight hours. In terms of overshadowing of gardens and open spaces the BRE guide recommends that for an open space to appear adequately sunlit through the year, more than half of the space should receive at least two hours of sunlight at the March equinox.
- 13.2.2. The daylight, sunlight and overshadowing impacts upon neighbouring developments, both those already constructed and those with extant consents, was considered most recently in the assessment of (ref. 2021/02896/VAR). The 2021 consent granted an increase to the horizontal and vertical parameters of Building C1 and reflects the bulk, scale and massing of the building as proposed within this drop in application. The daylight, sunlight and overshadowing report formed part of the 2021 ES addendum, which in turn has informed the 2024 ES addendum that has been prepared for the drop in application. Prior to this, the amenity impacts upon

neighbouring sites were assessed under (ref. 2017/04377/VAR). Officers accepted that the development, as then proposed, would not result in significant harm to the amenities of the nearest adjoining existing residential occupiers on Wood Lane or within the Wood Lane Estate. It was considered that the proposals were designed so that they do not unduly prejudice the development potential of the adjoining sites to the north, south or west which have the capacity to contribute towards the comprehensive regeneration of the White City Regeneration Area, by virtue of the extent of the daylight, sunlight, overshadowing and privacy impacts.

- 13.2.3. The 2021 ES addendum daylight, sunlight and overshadowing report further considered the impacts of the revised Building C1 massing on the other phases of the masterplan. The assessment concluded that there would be some additional reductions in light within Phase 2 and Phase 4 of the masterplan but was nevertheless considered acceptable in the 2021 assessment.

### **Imperial South**

- 13.2.4. The Imperial South (ICL South) site is located to the immediate north of Phase 5. ICL South benefits from an extant outline planning permission granted in 2021 for 373 residential dwellings within the southern blocks (phases 4 and 5), in addition to research, office, educational and academic uses elsewhere in the site (ref. 2018/00267/OUT). The ICL South southern blocks, phases 4 and 5, are planned to accommodate a hotel and residential dwellings from levels 1 up to 30. Plot 4 is located approx. 18m from Building C1 which has been accepted within the outline consent as being sufficient to ensure adequate levels of privacy for occupiers of the respective buildings. There have been no changes to either scheme or the context of either development that would lead officers to a different conclusion at this time.
- 13.2.5. The bulk, scale and massing of Building C1 has changed since the granting of the ICL South outline consent. Accordingly, the additional impacts were assessed under (ref. 2021/02896/VAR). The 2021 ES Addendum Daylight and Sunlight Assessment demonstrates that the proposed building would reduce daylight and sunlight levels below the former levels, as consented. Although the development, as revised does not considerably affect existing occupiers within surrounding residential accommodation, the future occupiers will be subject to lower levels of daylight/sunlight as a result of the revised development, as approved by ref. 2021/02896/VAR.
- 13.2.6. Notwithstanding the lowering of daylight and sunlight levels within the development to the north, it is considered subject to good design being secured at the reserved matters stage that a good standard of accommodation could still be secured in the adjoining development. It is important to note that the WCL development will only impact apartments in the southern elevation of the adjoining ICL development to the north. Again, there have been no material changes to either scheme or the context of either development that would lead officers to a different view than that presented in the assessment of (ref. 2021/02896/VAR). Accordingly, officers consider that, on balance, Building C1 would not have an unduly adverse effect on the standard of accommodation that would be afforded to future occupiers of the ICL South site.
- 13.2.7. The impacts of the WCL masterplan development on existing and proposed residential units in the wider area have been fully assessed under the outline consents. ICL South is the nearest future residential receptor to Phase 5 and

benefits from outline consent. Given the assessment outlined above, officers are satisfied that there would be no unduly adverse impacts upon daylight, sunlight, privacy or overlooking arising from Building C1 and that the conclusions drawn in the previous assessments under the masterplan consent remain valid. The proposal therefore complies with the aims of Policy HO11 and DC2 of the Local Plan.

## 14. Highways and Transport

### 14.1. Policy Context

- 14.1.1. **The NPPF** requires that developments which generate significant movement are located where the need to travel would be minimised, and the use of sustainable transport modes can be maximised; and that development should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.
- 14.1.2. **London Plan Policy T6** sets out the intention to encourage consideration of transport implications as a fundamental element of sustainable transport, supporting development patterns that reduce the need to travel or that locate development with high trip generation in proximity of public transport services. The policies also provide guidance for the establishment of maximum car parking standards in relation to hotel and leisure uses as well as blue badge parking at **Policies T6.4 and T6.5**. **London Plan Policy T5** sets out the requirements for cycle parking in accordance with the proposed use.
- 14.1.3. **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'.
- 14.1.4. **Local Plan Policy T2** relates to transport assessments and travel plans and states "All development proposals would be assessed for their contribution to traffic generation and their impact on congestion, particularly on bus routes and on the primary route network".
- 14.1.5. **Local Plan Policies T3, T4, T5 and T7** relate to opportunities for cycling and walking, vehicle parking standards, blue badge holders parking and construction logistics. **Local Plan Policy CC7** sets out the requirements for all new developments to provide suitable facilities for the management of waste.

### Site Accessibility

- 14.2. The application site is located within the White City Opportunity Area and benefits from excellent public transport accessibility, with a PTAL rating of 6a. The site is within a short walking distance of White City and Wood Lane Underground stations, providing access to the Central, Circle, and Hammersmith & City lines. Additionally, Shepherd's Bush Overground and National Rail stations are located approximately 800 metres to the south, and numerous bus routes serve the area via White City Bus Station and Wood Lane. The site is also well connected to the strategic road network,

with the A40 (Westway) approximately 500 metres to the north.

- 14.3. Vehicle access to the White City Living (WCL) site, including Phase 5, is primarily provided via the A219 Wood Lane, which connects to Fountain Park Way—a private internal road serving the wider masterplan. Vehicular movements within the site at the ground level are restricted to essential access only, including emergency services, deliveries, servicing, and drop-off. Access to the basement car park and servicing areas is managed via controlled ramps on Fountain Park Way, with bollards at key junctions regulating entry. For Phase 5 specifically, a managed service bay is located to the west of the building to facilitate deliveries and drop-off, while emergency access is provided via a north-south pedestrian axis between Phases 4 and 5. The proposed access strategy maintains the one-way circulation route established in earlier phases and integrates with the site-wide logistics and management systems.
- 14.4. Pedestrian and cycle access to the site at the ground level is facilitated through the internal network established by earlier phases of the WCL development. It is noted that concerns have been raised regarding the integration of Phase 5 with the wider pedestrian and cycle spine at the ground level, particularly in relation to the adjacent Imperial College London (ICL) campus to the north. The current layout does not address or include details of north-south pedestrian and cycle corridor, potentially undermining wayfinding and the prioritisation of sustainable travel modes. Therefore, it is recommended that further design revisions be considered to enhance permeability and connectivity through the site and further details with this regard would be secured by condition.
- 14.5. Cycle access to the White City Living (WCL) site, including Phase 5, is facilitated via the internal network established through earlier phases of the development, with primary access from Fountain Park Way. The site benefits from proximity to existing on-street cycle infrastructure along Wood Lane and is within a 20-minute cycling catchment of key destinations such as Kensington, Paddington, and Hammersmith.
- 14.6. The ICL South Campus to the north will provide stepped and level access between phase 5 and ICL. The landscape design proposes a highly permeable development providing important pedestrian and cycle connections with the Westfield shopping centre to the south and the existing Imperial College Campus development to the north beyond the A40 Westway. From the main site entrance on Wood Lane via a new bridge over the Central Line, a comprehensive network of vehicular and pedestrian routes will connect the development phases and associated public open spaces with links to the WCL site.

## **Car Parking**

- 14.7. Car parking for Phase 5 of the White City Living development is provided within the site-wide basement, accessed via a ramp located in Phase 1. This consolidated approach aligns with the masterplan strategy to minimise surface-level vehicle movements and maximise public realm and amenity space. The basement accommodates residents' car parking, with access managed through a controlled entry system. No surface-level residential parking is proposed within Phase 5, in keeping with the wider development's emphasis on pedestrian-priority design.

- 14.8. Car parking provision for Phase 5 includes 90 spaces (85 standard and 5 accessible), which is within the overall masterplan cap of 586 spaces. However, this would result in a ratio of 0.55 spaces per unit which exceeds the previously accepted ratio of 0.4 spaces per unit within the earlier phases. As such, a condition will restrict the overall number of spaces allocated to Phase 5 to ensure compliance with the previously approved ratio of 0.4 spaces per unit. It is acknowledged that the provision of on-site parking would be unlikely to be supported if the masterplan application were assessed against the current London Plan. However, the original outline consent predates the adoption of the current London Plan in 2021 and associated transport policies. The basement has been constructed, and the overall quantum of parking has been established under the masterplan consent. As such, it would be considered unreasonable to require that Phase 5 be car free given the special circumstances of the site and the application.
- 14.9. Provision of Disabled Persons Parking within this “Drop-In” application is provided at the level described in the London Plan 2021. This states that for developments exceeding ten homes, Disabled Persons Parking should be provided at 3% of the total number of homes at completion of development. The proposal for Phase 5 comprises of 5x No. ‘Wheelchair Accessible’ parking spaces. This corresponds to a 3% provision of all homes. Furthermore, the proposed layout of the Phase 5 basement will have the ability to increase the disabled parking provision to 10% overall provision of total homes if demand requires (as per London Plan 2021 requirements). This would necessarily reduce the total number of car parking spaces as Wheelchair Accessible spaces are larger.
- 14.10. A Car Parking Management Plan is to be secured by appropriate condition to ensure compliance with accessibility and electric vehicle charging standards, alongside the existing car permit-free agreement to restrict on-street parking within the masterplan legal agreement.

### **Cycle Parking**

- 14.11. Phase 5 will deliver 294 long-stay cycle parking spaces, including 15 accessible spaces, in accordance with the London Plan (2021) and London Cycle Design Standards. These spaces are located at basement level and accessed via a shared vehicle ramp. A mix of storage options are provided to balance spatial demands with residents’ needs. A mix of ‘two tier, stacking’ stands and Sheffield stands are provided.
- 14.12. In line with recommendations in the LCDS, 5% of the bicycles provision (total of 15 spaces) has been configured to accommodate larger, accessible cycles for disabled users or cargo bicycles. Short-stay cycle parking will be provided at ground level, with additional provision across the wider WCL site. While the quantum of cycle parking is policy-compliant, conditions are recommended to secure further details and improvements to the layout, access routes and supporting facilities to ensure the cycling infrastructure is inclusive, convenient, and encourages active travel.

### **Walking**

- 14.13. The proposals for White City Living Phase 5 demonstrate a strong commitment to promoting active travel and enhancing pedestrian connectivity. The development integrates a comprehensive network of pedestrian routes, including primary and



secondary footpaths, link bridges, and level access throughout. These routes would connect with the wider White City Living masterplan and adjacent developments, including Westfield London to the south and the Imperial College campuses to the north. The Residential Travel Plan outlines a clear strategy to encourage walking as a primary mode of travel, supported by initiatives such as Travel Information Packs, walking isochrones, and the promotion of local amenities within a 15-minute walk. The Stage 1 Road Safety Audit has informed design interventions to improve pedestrian safety, including enhanced visibility at junctions, surface treatments to alert drivers to pedestrian crossings, and relocated street furniture to reduce obstructions. The Transport Assessment confirms that the anticipated pedestrian trip generation from Phase 5 is modest and can be accommodated within the existing and proposed infrastructure without adverse impact. Therefore, the submitted strategy with the emphasis on walkability is supported and continued monitoring and coordination with neighbouring developments to ensure a cohesive and safe pedestrian environment is recommended and secured by the condition.

### **Framework Travel Plan**

- 14.14. The submitted Residential Travel Plan (RTP) for Phase 5 of the White City Living development outlines a framework for promoting sustainable travel behaviour among future residents. While the RTP builds upon the previously approved site-wide Framework Travel Plan and includes a range of initiatives—such as Travel Information Packs, cycle parking provision, and modal shift targets—it is considered to not fully address current policy expectations, notably the London Plan’s Healthy Streets approach or the Borough’s climate emergency objectives.
- 14.15. Therefore, the submitted RTP is considered acceptable as a framework at this stage and further details and monitoring would be secured by way of a planning obligation to include details on targets for reducing private car use, details on how active travel will be prioritised through design and updated monitoring data from completed phases with contact details for the Travel Plan Coordinator. Final travel plan details and the associated monitoring fee are secured by way of planning obligation within the masterplan legal agreement, which the current application would be bound by should permission be granted. Subject to this the proposal is in line with London Plan Policy T1 and the Borough’s Local Plan.

### **Delivery and Servicing**

- 14.16. The delivery and servicing strategy for Phase 5 of the White City Living development will integrate with the wider masterplan arrangements, with most deliveries managed via the central concierge facility located in Phase 1. Servicing vehicles will access the site via Fountain Park Way and utilise designated kerbside loading bays, including a dedicated layby adjacent to Phase 5. The Delivery and Servicing Plan (DSP) estimates approximately 18 two-way servicing trips per day, with peak hour activity expected to remain low and within acceptable limits. Waste collection will be managed by the estate team, with refuse transferred to the existing basement service yard for collection. Concerns have been raised regarding the reliance on Phase 1 facilities, which were not designed to accommodate the full masterplan demand. Therefore, a revised DSP will be secured by condition to ensure appropriate provision and management of servicing infrastructure, including the removal of bollards from designated laybys and the promotion of sustainable delivery modes such as cargo bikes. Further details should include measures to prevent vehicle queuing and ensure

that all servicing activity is managed to minimise impacts on pedestrian and cycle movements within the site.

## **Construction Logistics Plan**

- 14.17. The Construction Logistics Plan (CLP) for Phase 5 outlines a detailed strategy to manage construction traffic and minimise disruption to the surrounding area. The plan proposes access via Depot Road and Fountain Park Way, supported by a subterranean haul road beneath completed phases. A Delivery Management System (DMS) will coordinate all deliveries, with traffic marshals and holding zones ensuring safe and efficient vehicle movement. Even though, the concerns were raised about the use of Fountain Park Way and the underground link, particularly as this route is intended to serve Blue Badge parking and cycle access for other phases, officers note, following site visit that this route has been used for the construction of Phase 4 of the masterplan. Furthermore, subject to Imperial College approval, construction access would be available via the Depot Bridge and Imperial College site.
- 14.18. Therefore, it is recommended that a revised and updated CLP be secured via planning condition and include detailed phasing, vehicle routing, site layout, and compliance with CLOCS and FORS Silver standards. Additionally, the plan should demonstrate how construction vehicle numbers will be minimised, how complaints will be managed, and how site safety will be maintained. Given the site's proximity to London Underground infrastructure, consultation with LU Infrastructure Protection would be advised at that stage. These measures are essential to ensure that construction activities are managed in a way that supports sustainable transport, protects pedestrian and cyclist safety, and aligns with the Borough's climate and transport policies. The CLP must also address cumulative construction impacts in the wider White City area, including coordination with the delivery of the Wood Lane cycleway.

## **15. Accessibility**

- 15.1. **Policy S3 of the London Plan** seeks to ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach. **London Plan Policy D5** seeks to ensure developments achieve the highest standards of accessible inclusive design.
- 15.2. **Policy DC2 of the Local Plan** states that new build development must be designed to respect the principles of accessible and inclusive design.
- 15.3. The proposed development Plot C1 - Phase 5 of White City Living has been designed with an emphasis on inclusive and accessible design, in line with the London Plan and Building Regulations Approved Document M. The scheme provides step-free access throughout, with 90% of homes designed to M4(2) standards for accessible and adaptable dwellings, and 10% to M4(3) standards for wheelchair user dwellings. These wheelchair adaptable homes are located to maximise access, daylight, and views, and are designed with generous internal layouts, accessible bathrooms, and kitchens that can be adapted to suit individual needs. Communal areas, including corridors and lift lobbies, meet or exceed minimum width requirements, and all homes benefit from level access to private balconies or terraces.

- 15.4. Beyond the residential units, the development incorporates inclusive design principles across the wider site. Safe, legible, and accessible pedestrian routes are provided throughout the public realm, with clear wayfinding and separation from vehicular traffic. The building's entrances are clearly defined and sheltered, and the landscaping strategy includes accessible amenity spaces and play areas. The design also allows for future adaptability, with non-loadbearing partitions and flexible layouts that can accommodate changing needs over time. These measures ensure that the development is welcoming and usable for all residents and visitors, regardless of age or ability, and align with the borough's objectives for inclusive growth and sustainable communities.
- 15.5. The proposed development demonstrates inclusive and accessible design in both car parking and cycle storage provision. Within the basement of Phase 5, 90 car parking spaces are proposed, including 5 designated wheelchair accessible bays, equating to 3% of the total homes, in line with London Plan requirements. The layout has been designed to allow for future expansion to 10% accessible provision (17 bays) without structural alterations, ensuring flexibility to meet future demand. These accessible bays are located at ground level and close to residential cores to support ease of use. For cycle storage, 294 long-stay spaces are provided, including 15 accessible spaces (5%) for larger or adapted cycles such as handcycles and cargo bikes. These are located near the residential entrance and designed with sufficient clearance and Sheffield stands to accommodate a range of user needs. Additionally, four short-stay visitor cycle spaces are provided at ground level. The design of both facilities aligns with the London Cycle Design Standards and ensures that all residents, including those with mobility impairments, can access secure and convenient transport options.

## **16. Energy, Sustainability, Circular Economy and Overheating**

- 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 London Plan encourages Boroughs to adopt their own local cost of carbon. 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.

- 16.5. A report was approved by Cabinet on 1 April 2025 allowing the publication of a carbon offset cost guidance note. The guidance note establishes 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 are still required to maximise carbon savings through on-site measures before resorting to use of the offset payment. The “sliding scale” approach is intended to encourage this approach and incentivise developers to include more on-site carbon reduction measures. The local tariff came into force on the 1 July 2025.
- 16.6. **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.
- 16.7. **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**

- 16.8. The applicant has submitted an energy strategy that is specific to Phase 5. However, there are some areas where Phase 5 cannot be considered in isolation as Plot C1 will be connected to the site-wide energy network and therefore the overall methodology for reducing carbon emissions has been established through the outline consent.
- 16.9. The strategy follows the London Plan’s energy hierarchy—Be Lean, Be Clean, Be Green, and Be Seen—exceeding a 35% reduction in regulated CO<sub>2</sub> emissions through on-site measures. The development will connect to the existing White City Living heat network, which is being decarbonised via air source heat pumps (ASHPs) installed in Phase 4, ensuring low-carbon heating provision.
- 16.10. Under the Be Lean stage, the scheme incorporates enhanced building fabric performance, air tightness, and mechanical ventilation with heat recovery (MVHR) systems to reduce energy demand. These measures exceed the London Plan’s minimum energy efficiency target of 10% for residential spaces. The strategy also integrates passive design features to mitigate overheating, including solar control

glazing, external shading, and natural ventilation, aligning with Policy SI4 and Building Regulations Part O.

- 16.11. The Be Clean stage confirms that Phase 5 will connect to the site-wide heat network, which prioritises ASHPs over Combined Heat and Power (CHP) engines, in line with Policy SI3. The network is designed to deliver 80% of heat from ASHPs and 20% from the existing CHP and gas boilers.
- 16.12. In the Be Green stage, the feasibility of additional renewable technologies was assessed. While rooftop solar PV was deemed unfeasible due to limited space, the connection to the ASHP-led heat network already provides substantial renewable energy benefits. The strategy achieves a 57% reduction in regulated CO<sub>2</sub> emissions for residential units, exceeding the London Plan's minimum requirements.
- 16.13. A carbon offsetting contribution will be required to achieve net zero. Using the locally adopted tariff, the carbon offsetting contribution will be £849,360 based on the Local Plan rates.
- 16.14. The sustainability statement reiterates the energy efficiency measures outlined above. It also supports Local Plan policies CC1 and CC2 by implementing energy conservation, sustainable construction, and low-carbon heating strategies. The development includes energy-efficient lighting, smart meters, and appliances. The development also meets overheating mitigation standards (CIBSE TM59), targets water consumption of 105 litres/person/day and includes sustainable drainage systems such as living roofs. Overheating mitigation is as set out in the relevant section of this report. Landscaping and planting strategies are intended to enhance ecological value, and green roofs are included to support biodiversity and manage surface water runoff. The developer has confirmed that they would introduce rainwater harvesting into Phase 5 and full details of this will be secured by way of condition.
- 16.15. The proposal is therefore in accordance with Policy CC1 of the Local Plan and Policy SI2 of the London Plan, subject to conditions requiring compliance with the energy strategy and the aforementioned carbon offsetting payment. This will be secured through the legal agreement.

### **Circular Economy Statement and Whole Life-Cycle Carbon Assessment**

- 16.16. The application includes a Whole Lifecycle Carbon Assessment (WLCA), following the GLA's guidance and using the One Click LCA Tool for calculations.
- 16.17. A Whole Life Cycle Carbon Emissions (WLCCE) Assessment has been submitted in support of the application. The assessment evaluates both operational and embodied carbon emissions over a 60-year period, in line with the methodology set out in the GLA guidance. The development achieves a total WLCCE of 1,155 kgCO<sub>2</sub>/m<sup>2</sup> (including sequestered carbon), which is within the GLA's benchmark of <1,200 kgCO<sub>2</sub>/m<sup>2</sup> for referable developments. The assessment demonstrates compliance with London Plan Policy SI 2 (Minimising Greenhouse Gas Emissions), confirming that the scheme has taken all reasonable steps to reduce lifecycle emissions through design measures such as high recycled content in materials and prefabricated components.

- 16.18. 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% target for the recycling of non-hazardous construction waste can be met. Energy, water and waste will be monitored throughout construction and 100% of timber used on site, including timber used in the construction phase, will be sourced from sustainable forestry sources. The statement demonstrates that various strategies can be implemented throughout the lifetime of the development to support a circular economy approach.

### **Overheating**

- 16.19. The application is supported by an overheating report which assesses the development's compliance with overheating mitigation requirements under CIBSE TM59 (2017) and Approved Document O (2021). The report evaluates a representative sample of dwellings and communal corridors using dynamic thermal modelling, incorporating passive design measures such as solar control glazing, external shading, thermal mass, and enhanced mechanical ventilation. All tested units and corridors meet the TM59 criteria under the mandatory DSY1 weather file (2020s, high emissions, 50% percentile scenario), demonstrating that the design effectively mitigates overheating risk. Where noise constraints limit window opening, active cooling is proposed to ensure compliance.
- 16.20. The strategy aligns with the London Plan Policy SI4 (Managing Heat Risk), which prioritises passive measures and minimising reliance on air conditioning. The design follows the London Plan cooling hierarchy and integrates efficient building fabric, shading, and ventilation. It also supports LBHF Local Plan Policy DC3 (Tall Buildings), which requires minimising energy use and overheating risk through sustainable design. The report confirms that the development meets national, regional, and local policy requirements, ensuring thermal comfort for future residents while addressing climate resilience and sustainability.

## **17. 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. A Phase 5 Drainage and SuDS Strategy Report has been provided with this application. A Flood Risk Assessment (FRA) has previously been carried out for the entire site. This has also been included with this submission. The site is situated

entirely within Flood Zone 1. Flood Zone 1 is defined as an area with an annual probability of flooding from rivers or the sea of less than 0.1%, which is classified as low.

- 17.4. As previously set out in supporting documents for the earlier applications, the drainage arrangements for Phase 5 will integrate into the wider drainage strategy for the wider White City Living site.
- 17.5. Surface water run-off will be collected and conveyed through the drainage network which is linked to the network developed for earlier phases, particularly Phase 1 where an attenuation tank is used to store surface water for controlled release into the Thames Water sewer network. This has been designed to have capacity for all Phases of the development so can accommodate flows from this Phase 5 proposal. Discharges from this system are limited to 15 l/s for the whole site, which has previously been agreed.
- 17.6. Consideration has been given to including Sustainable Drainage Systems (SuDS) in Phase 5 such as infiltration-based measures, although there is an extensive basement below the site which limits this. However, there are some planted areas at roof and podium levels, including living roofs.
- 17.7. Subject to conditions, the proposal is considered to be in accordance with Policy SI 12 and SI 13 of the London Plan and Policy CC2, CC3 and CC4 of the Local Plan.

## **18. Waste and Recycling**

- 18.1. **Local Plan Policies CC6 (Strategic Waste Management) and CC7 (Onsite 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 Operational Waste Management Strategy (OWMS) for Phase 5 outlines a comprehensive approach to managing residential waste for the proposed 163 residential units. The strategy includes internal waste segregation facilities within each unit, a dedicated basement-level waste storage room, and a centralised service yard for collection. Waste will be separated into mixed recyclables, residual, and organic streams, with provision for future food waste collection.
- 18.3. Weekly waste generation is estimated at approximately 33,705 litres, including 16,445 litres each of mixed recyclables and residual waste, and 815 litres of organic waste. To accommodate this, the development will provide a basement-level waste storage room with 13 bins: 4 for recyclables (1,280L), 5 for residual waste (1,100L), and 4 for organics (240L). This provision ensures at least two days' storage capacity for recyclables and residuals, and one week for organics, in line with LBHF's 2018 Planning Guidance SPD. Waste will be transferred by the Facilities Management (FM) team to a central service yard using electric towing vehicles, where it will be compacted into four 10,700L portable compactors (two each for recyclables and residuals).

- 18.4. The OWMS has been designed to effectively manage domestic waste for the lifetime of the development and is in accordance with Policy CC6 and CC7 of the Local Plan.

## **19. Land Contamination**

- 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. Given the nature of land contamination in existence, sitewide reports have been produced and previously approved that cover Phases 2 – 5 of the development. A sitewide remediation strategy demonstrated that no gas membrane is required throughout the site and therefore no further site investigations were required. A sitewide remediation method statement was approved under (ref. 2018/02701/DET) and has been resubmitted as part of this application. The RMS was prepared following detailed site investigation and monitoring and sets out the scope of works required on site. A verification report and long-term monitoring report is then required for each phase to confirm that the RMS works have been undertaken, and suitable monitoring will be in place. The verification report and long-term monitoring report for Phase 5 will be secured by way of condition. Subject to these conditions, the development can be considered to be in accordance with Policy CC9 of the Local Plan.

## **20. 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. White City Living Phase 5 development is located within an Air Quality Management Area (AQMA), which applies to the entire London Borough of Hammersmith and Fulham. The air quality assessment for the White City Living Phase 5 development concludes that the proposed scheme is acceptable in air quality terms, both during construction and once operational. During the construction phase, the scale and duration of works present a high risk of dust emissions; however, with best practice mitigation measures in place—such as dust suppression, wheel washing, and site management—the residual effects are expected to be minor adverse and not significant. The operational phase modelling shows that emissions from road traffic and the on-site energy centre (CHP and boilers) will result in negligible impacts at all assessed receptors. Predicted increases in NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> concentrations are imperceptible, and all short- and long-term air quality objectives are expected to be met. The development also meets the GLA's air quality neutral benchmarks for transport emissions, although building emissions slightly exceed benchmarks, suggesting a Low Emission Strategy and potential off-site mitigation may be required. This would be secured by appropriate conditions.
- 20.5. The Environmental Statement, which includes air quality considerations, concludes that there are no changes to the predicted effects of the development compared to previous assessments. Therefore, the environmental impacts, including air quality, remain acceptable and consistent with the conclusions of the 2021 Environmental Statement Addendum and the 2023 Statement of Conformity.
- 20.6. The proposed development will connect to the existing site-wide infrastructure and heat network, which is being supplemented with air source heat pumps in Phases 4 and 5. This approach supports the reduction of emissions and aligns with the London Plan's "Be Lean, Be Clean, Be Green" energy hierarchy. The Whole Life Cycle Carbon Assessment confirms that the development meets the Greater London Authority's benchmarks for carbon emissions. Additionally, the Sustainability Statement highlights measures such as energy-efficient design, water-saving fixtures, and the use of locally sourced materials to reduce environmental impact. These strategies collectively contribute to maintaining and improving air quality in the borough, supporting the planning policy objectives of both the London Plan and the LBHF Local Plan.
- 20.7. Council's Environmental Quality Officer (Air Quality) reviewed the submitted documents and raised no objections, subject to conditions. Therefore, several conditions are recommended for various air quality control measures in relation to both construction and operational phases of the proposal to ensure compliance with Policy CC10 of the Local Plan. Conditions relating to ventilation strategy, low emissions, delivery and servicing plan and Zero Emissions Heating (Air Source Heat Pump) would be secured to ensure compliance with Policy CC10 of the Local Plan. A compliance monitoring fee for the AQDMP can be drawn down from the WCOAF obligation already secured for the construction phase. Subject to conditions and obligation, the proposal would accord with Policy CC10 of the Local Plan and Policy SI 1 of the London Plan.

## 21. 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. An acoustic planning report has been submitted in support of the application. The report evaluates internal and external noise levels, sound insulation, plant noise, and vibration. The assessment confirms that the proposed design can meet the required internal noise criteria for residential use, including enhanced sound insulation between dwellings and between residential and non-residential uses.
- 21.6. The report confirms that external noise intrusion has been modelled using validated survey data and that the proposed building fabric, glazing, and mechanical ventilation strategy (MVHR) will ensure compliance with BS8233:2014 internal noise targets. External amenity areas, including balconies and terraces, are generally predicted to meet or be close to the 55 dB LAeq,16hr guideline. Where exceedances occur, they are minor and limited to a small number of balconies with direct exposure to nearby transport routes. The report concludes that these exceedances are acceptable in the context of the urban environment and the overall design.
- 21.7. Sound insulation between residential units is designed to exceed Building Regulations requirements by at least +5 dB, and by +10 dB where residential units adjoin non-residential spaces such as the residents' bar. The proposed wall and floor constructions have been reviewed and are considered capable of achieving these enhanced performance levels. The report also includes detailed specifications for mitigating flanking transmission through curtain walling systems and addresses potential wind noise issues from perforated panels.
- 21.8. Railway vibration has been assessed and found to be negligible due to the distance between Plot C1 and the nearest railway lines. Vibration Dose Values (VDVs) are well below thresholds for adverse comment, and no mitigation is required. Mechanical plant noise has also been assessed, with proposed rooftop plant screened and designed to meet noise limits relative to background levels.

- 21.9. A Level 1 Acoustic Ventilation and Overheating (AVO) assessment has been undertaken, identifying most façades as low/medium risk and the southern façade as negligible risk. This indicates that openable windows are generally suitable for mitigating overheating without compromising internal noise levels.
- 21.10. Overall, the acoustic design of Phase 5 is considered compliant with London Plan Policy D14 (Noise), as well as Local Plan Policy CC11 (Noise) and CC13 (Control of Potentially Polluting Uses). The report demonstrates that the development will provide a high standard of residential amenity in terms of acoustic environment, with appropriate mitigation measures incorporated into the design to address potential noise and vibration impacts. A condition will secure compliance with the acoustic planning report.

## **22. 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. An archaeological desktop study was submitted as part of the original outline application and a condition was attached to that permission requiring the submission of a full archaeological statement. A sitewide archaeological statement was submitted and approved under (ref. 2016/00728/DET). This report has been resubmitted as part of the current application. Given the nature of the content of the report, it is considered appropriate to accept this document as the findings and conclusions will remain valid.
- 22.4. The submitted Archaeological Statement, prepared by CgMs, expands upon the desktop assessment submitted with the approved outline. The statement clarifies the extent of post-depositional impacts, the lack of identifiable archaeological potential and that further archaeological fieldwork is unnecessary. Historic England reviewed the archaeological statement and have advised that they concur with the content and recommendations of this statement and the comprehensive work that has taken place to prepare this document. Having considered the submitted document. Historic England advises that no further archaeological work is necessary. This is therefore considered sufficient to satisfy the requirements of London Plan Policy HC1 and Local Plan Policy DC8.

## **23. 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 submitted a Stage 2 Fire Strategy prepared by a suitably qualified third-party assessor. This document seeks to demonstrate that the proposed development has been designed to offer a safe environment for residents. A London Plan Fire Statement has also been provided.

- 23.2. The submission has been reviewed by the HSE Planning Gateway One team who have confirmed that they are content with the details provided by the applicant. It is pertinent to note that many requirements related to fire safety are dealt with at later regulatory stages that fall outside the remit of planning.
- 23.3. The fire strategy adopts a "stay put" evacuation policy for residential units, with simultaneous evacuation for ancillary and amenity spaces. Two stair cores serve the building, each with firefighting shafts, and all apartments are fitted with sprinklers and appropriate fire detection. Mechanical smoke ventilation systems (MSVS) are proposed. Building C1 will include a wet riser system, firefighting lifts, and secure information boxes for fire services. Structural elements will achieve 120 minutes of fire resistance, and compartmentation is provided throughout, including 60-minute fire-rated apartment enclosures and 30-minute protected internal hallways. External wall materials will meet Class A2-s1, d0 or Class A1, and balconies will be constructed to the same standard. The car park and ancillary areas are treated independently with their own fire safety measures, including sprinklers and mechanical smoke ventilation.
- 23.4. Access for fire and rescue services has been designed in accordance with Approved Document B and London Fire Brigade guidance, ensuring fire appliance access within 18m of wet riser inlets and hydrants within 90m. The firefighting shaft includes a protected stair, firefighting lift, and ventilated lobby. Emergency power supplies will support all life safety systems, including alarms, sprinklers, and smoke control systems. The strategy also includes an evacuation alert system and secure information boxes, as required for buildings over 18m in height.
- 23.5. 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. Compliance with the fire statement and fire strategy will be secured by way of condition and the developer will be required to adhere to additional regulatory requirements that fall outside the remit of planning.

## **24. Designing Out Crime**

- 24.1. **The NPPF (2024) Paras. 96 and 102** seek to ensure that planning decisions promote public safety and consider wider security and defence requirements. They should anticipate and address all plausible malicious threats and natural hazards and create safe, inclusive, and accessible places that have high levels of amenity and do not undermine quality of life, community cohesion and resilience to due crime and disorder.
- 24.2. **Local Plan Policy DC2** requires developments to be designed in line with the principles of Secured by Design.
- 24.3. A condition shall be attached to any permission granted requiring the submission of a statement demonstrating how Plot C1 will achieve the relevant secured by design requirements. The developer has worked with the Metropolitan Police's design out crime team throughout the delivery of the masterplan to ensure all feasible best practice standards are met. There is a sitewide external CCTV network and internal CCTV within communal spaces and the basement. Full details of safety measures, specific to Phase 5/Plot C1 will be provided when discharging the relevant condition.

## **25. Community Infrastructure Levy (CIL)**

- 25.1. 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. An amended charging schedule was adopted in February 2019 (MCIL2). Under the London wide Mayoral CIL, the scheme would be liable for a CIL payment, with LBHF falling within charging Zone 1. Mayoral CIL payments are allocated to funding Crossrail 1 (the Elizabeth Line) and Crossrail 2.
- 25.2. 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.
- 25.3. The application site is within White City East Opportunity Area. Development within this defined area attracts a nil charge for Borough CIL as set out in LBHF's CIL charging schedule. Financial contributions towards the White City Opportunity Area Fund (WCOAF) have instead been secured within the Masterplan consent's legal agreement. The total WCOAF financial contribution secured under the Masterplan consent is £14,081,899. The contribution is inclusive of Phase 5 and a final payment will be due upon commencement of construction of Plot C1.

## **26. Heads of Terms and Legal Agreement**

- 26.1. The site-wide masterplan outline consent (ref. 2014/04726/OUT) was approved subject to a s106 legal agreement. There have been nine subsequent Deed of Variations since the original permission was granted. At each stage in amending the s106, LBHF officers have considered that the s106 obligations were required in order to make the development acceptable in planning terms and were compliant with the CIL regulations (at the time) given the obligations are/were reasonable, proportionate and would be directly related to the development.
- 26.2. The development proposed by the current application for full planning permission is intrinsically linked to the masterplan development. Building C1/Phase 5 was granted by way of the WCL outline consent. The planning obligations secured within the masterplan legal agreements had been negotiated so as to mitigate the impact of the whole development, including Phase 5. The current application does not seek an intensification of the development granted by the outline consent, nor does it seek any deviation from the approved scheme. As such, the impacts of the Phase 5 development have been suitably and appropriately mitigated by way of the planning obligations secured within the masterplan legal agreement.
- 26.3. It is therefore proposed that the masterplan s106 legal agreement is amended by way of a further deed of variation to incorporate the Phase 5 drop in permission. The amendments would not change the nature of the obligations sought, other than where specifically stated in this section. All obligations within the legal agreement would still apply.
- 26.4. The DoV would append the Phase 5 drop in decision notice and insert the reference number of the permission where necessary and relevant.

- 26.5. An amendment will be secured to the carbon offsetting obligation within the legal agreement to capture the enhanced local tariff which has been adopted as of the 1 July 2025.
- 26.6. The amendment shall secure a financial contribution of £849,360 to allow Phase 5 to achieve net zero. The existing wording within the legal agreement secured a carbon offset fund pot to cover both Phases 4 and 5, with the final contribution for each phase confirmed and paid at reserved matters stage. The pot comprised £1,416,165. Phase 4's offsetting cost was confirmed at reserved matters stage as £732,450. This leaves £683,715 in the pot to cover Phase 5 which falls short of the £849,360 required to achieve net zero.
- 26.7. As such, the carbon offsetting fund will be increased by £165,645 to £1,581,810 to cover this shortfall.

## **27. Conclusion and Recommendations**

- 27.1. In considering planning applications, the Local Planning Authority needs to consider the development plan as a whole and planning applications that accord with the development plan should be approved without delay, unless material considerations indicate otherwise and any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 27.2. 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 is in accordance with the aims and objectives of the policies contained within the relevant development plan documents.
- 27.3. It is therefore recommended that planning permission be granted in line with the recommendations given at the start of this report.