

6 January 2016

**Former Parsons Green Depot**  
**in the London Borough of Hammersmith and Fulham**  
**planning application no. 2015/05287/OUT**

**Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

**The proposal**

Outline planning application for demolition of existing buildings and redevelopment of the site to include the erection of a series of 3, 4, 5 and 6 storey plus basement buildings and conversion of existing railway arches, comprising a maximum of 119 residential units (totally 16,500sq.m.); a maximum of 1,100sq.m. of Class A1/A2/A3/A4 retail/cafe/restaurant/bar floorspace; a maximum of 2,315sq.m. of Class B1 workspace and Class D2 leisure floorspace (maximum 575sq.m.) in podium block; and maximum of 1,739sq.m. of Class B1 workspace in Block H; together with associated car parking, new access, landscaping and public realm.

**The applicant**

The applicant is **Transport for London** and the agent is **Nathaniel Lichfield & Partners**.

**Strategic issues**

The principle of mixed use development is supported in strategic planning terms. However, further information and discussion is required on **housing, affordable housing, urban design, inclusive access, sustainable development** and **transport** to ensure compliance with London Plan policies.

**Recommendation**

That Hammersmith and Fulham Council be advised that while the application is generally acceptable in strategic planning terms, the application does not yet comply with the London Plan, for the reasons set out in paragraph 111 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

**Context**

1 On 1 December 2015, the Mayor of London received documents from Hammersmith and Fulham Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 11 January 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1B of the Mayor of London Order 2008:

- *1B “Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings (c) outside Central London and with a total floorspace of more than 15,000 square metres.”*

3 Once Hammersmith and Fulham Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London’s statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## **Site description**

5 The 1.38 hectare site is located to the east of Parsons Green Lane opposite Parsons Green Underground Station. The site is irregularly shaped and extends for approximately 350 metres along the northern edge of the District Line. At its narrowest point the site is approximately 6 metres wide.

6 The site was originally used as a railway depot to service the District Line as a maintenance depot and was until recently safeguarded for the Chelsea and Hackney Line (Crossrail 2). The land is still designated in the Council’s Proposals Map for the Chelsea and Hackney Line (Crossrail 2) but has been identified by TfL as surplus to requirement for this use. It is also considered as non-designated industrial land. It is currently occupied by a variety of employment uses including storage, showrooms, workshops, offices, leisure and a car pound (Class A1, B1, B2, B8 and D2). The western part of the site contains predominantly one to two storey shed structures and a taller four storey brick building fronting Parsons Green Lane (used as a bridge club and offices above). Buildings on the north eastern part of the site have been demolished and the car pound currently operates from this site. The surrounding area is predominately residential, comprising a mix of terraced housing, mansion blocks and post-war apartment blocks.

7 Part of the south west of the site (south of the railway arches) falls within Parsons Green Conservation Area. The remainder of the site is not within a conservation area but two conservation areas lie to the north. The site is an out of town centre location with Fulham being the closest Major Town Centre.

8 Parsons Green (District Line, Wimbledon branch) is the closest London Underground station and lies 40m to the west of the site. Seven bus routes (295, 211, 28, 391, 424, 14, 414) serve the site from stops on Fulham Road, located within 500 metres. These buses operate at an average of more than seven buses per hour. The public transport accessibility level (PTAL) of the site is good and estimated at 4 (on a scale of 1 to 6b, where 6b is ‘excellent’). The nearest section of the Transport for London Road Network (TLRN) is Finborough Road, located approximately 1.1 kilometre to the east of the site. The nearest section of the Strategic Road Network (SRN) is Fulham Road, located 175 metres north of the site. Primary access is via Parsons Green Lane, with secondary vehicular access also provided off Harbledown Road and Barclay Road, albeit use of these is restricted by planning conditions.

## Details of the proposal

9 Transport for London (TfL) intends to redevelop the site for a mixed-use residential-led scheme comprising a total of 119 residential units (totalling 16,500sq.m.), a maximum of 1,100sq.m. of Class A1-A4 retail/cafe/restaurant/bar floorspace; a maximum of 2,315sq.m. of Class B1 workspace and Class D2 leisure floorspace (maximum 575sq.m.) in a podium block; and maximum of 1,739sq.m. of Class B1 workspace in Block H. Associated car parking, new access, landscaping and public realm works are also being proposed. Outline planning permission for land use, access, layout and scale is being sought for approval.

10 The remaining matters (appearance and landscaping) are reserved for later approval. However, indicative information is provided relating to the reserved matters in order to demonstrate that a satisfactory development could be accommodated on the site.

11 The scheme involves a series of buildings including up to 119 homes, comprising 106 apartments and 13 townhouses, and associated car parking and plant. The buildings range from three storeys for the townhouses, and up to six storeys for the mixed-use components. The development also proposes public realm upgrades with routes cutting through the site and access via shared surfaces, areas of open amenity space, street trees and planting.

12 The indicative land use schedule is outlined below.

Use	Class C3 Residential	Class A1-A4 Retail	Class B1 Workspace and Class D2 Leisure*	<b>Total</b>
Proposed floorspace GIA (m <sup>2</sup> )	16,439	1,100	4,054	<b>21,593</b>

\* proposal floorspace includes a maximum of 575sq.m. of Class D2 Leisure floorspace at ground floor (max 300sq.m.) and basement (max 275sq.m.)

## Case history

13 A pre application meeting was held between the applicant and GLA officers on 13 October 2015 at City Hall. The applicant was advised that the principle of mixed-use residential-led redevelopment on this site was supported in principle. However, this was subject to clarification and further details on aspects of the scheme including employment, housing, affordable housing, urban design, inclusive access, sustainable development and transport.

## Strategic planning issues and relevant policies and guidance

14 The relevant issues and corresponding policies are as follows:

- Employment *London Plan; the Mayor's Economic Development Strategy; Land for Industry and Transport SPG*
- Housing *London Plan; Housing SPG; draft interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; Housing SPG; draft interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; draft interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*

- Inclusive Access *London Plan; Accessible London: achieving an inclusive environment SPG*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG*

15 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Hammersmith and Fulham Core Strategy and Proposals Map (2011); the Development Management Local Plan (2013); and 2015 the London Plan (Consolidated with Alterations since 2011).

16 The following are also relevant material considerations:

- National Planning Policy Framework and the accompanying National Planning Practice Guidance;
- The draft Minor Alterations to the London Plan (2015);
- Hammersmith and Fulham Planning Guidance Supplementary Planning Document (July 2013); and,
- Hammersmith and Fulham Draft Local Plan (Regulation 18) (January 2015).

## **Principle of development**

17 The scheme involves the comprehensive redevelopment of the site, currently in employment/industrial uses. As a residential-led mixed-use development, the proposals would result in the loss of existing employment and leisure floorspace. The existing floorspace is estimated to be 7,224sq.m. of employment and industrial land uses (Classes A1, B1, B2, B8 and D2), which is occupied by a range of local businesses with approximately 254 jobs (186 full time and 68 part time jobs) which equates to 220 FTEs.

18 The applicant is proposing to replace the existing floorspace with a maximum of 5,175sq.m. of employment generating floorspace, of which a maximum of 1,100sq.m. would be used for retail uses (Class A1/A2/A3/A4), and a maximum of 4,075sq.m. would be used for flexible workspace and leisure uses (Classes B1 and D2). The applicant has estimated that the proposed commercial floorspace could support 278 FTE jobs, which is an increase in the estimated current number of jobs.

19 Whilst there is a net loss of approximately 2,000sq.m. of employment floorspace the applicant has indicated that there will be an increase of approximately 58 FTE jobs. The proposed employment floorspace has the potential to result in an increased employment density and job numbers, which is supported in strategic planning terms.

20 GLA officers have acknowledged that the site has been designated as safeguarded land for Crossrail, and that the businesses currently occupying the land are on short leases with six-month break clauses, and that all leases will expire by 2022. Notwithstanding this, the uses on site serve a particular local need, by virtue of the cheaper rent and light industrial location. The applicant has indicated that they have been working with the businesses and an industrial agency team to assist the existing occupiers to source alternative premises, which is welcome. GLA officers note that the applicant has indicated that some of the displaced businesses may be able to be relocated on site which would be supported. If any of the displaced businesses wish to relocate, the applicant should support them to do so, including measures for temporary relocation.

### Loss of industrial land

21 The London Plan promotes a rigorous approach to industrial land management to ensure sufficient stock of land and premises is provided to meet the future needs of different types of industry and related uses in different parts of London, including good quality and affordable space. London Plan Policy 4.4 'Managing industrial land and premises' promotes an evidence based approach to reconcile demand and supply of industrial land through three types of location: strategic industrial locations; locally significant industrial sites; and other industrial sites (non-designated).

22 Taking into account London Plan Policy 4.4 and guidance in the Mayor's Land for Industry SPG, sites are monitored against benchmarks to manage industrial land release. The SPG sets an indicative industrial land release benchmark for Hammersmith and Fulham of 39 hectares over the period 2011-2031 with restricted release of industrial land (with exceptions in White City and Old Oak).

23 The proposed development would result in the release of non-designated industrial land. Whilst not protected under the London Plan, any loss of such industrial land needs to be carefully monitored and managed by the Council. The Council should therefore be satisfied that the quantum of industrial land released by this proposal does not undermine its wider employment capacity.

### Loss of community facility/leisure use

24 London Plan Policies 3.1 'Ensuring equal life chances for all' and 3.16 'Protection and enhancement of social infrastructure' seek to protect community facilities which meet the needs of particular groups and communities and resist their loss. Policy 3.1 states that proposals involving the loss of these facilities without adequate justification or provision for replacement should be resisted. Policy 3.16 goes further and states that the loss of social infrastructure without any existing re-provision should be resisted. It is understood that the site currently accommodates a bridge club and climbing wall with an approximate floorspace of 526sq.m.

25 It is understood that the applicant is not intending to replace the climbing wall, but that demand for such a facility could be met locally in the 'Clip n Climb Chelsea centre'. The Council should be satisfied with the relocation of the climbing wall to its new location in terms of capacity.

26 The applicant has indicated that there is potential for the bridge club to relocate to the proposed D2 flexible leisure floorspace, which would be strongly supported.

### Loss of car pound

27 There are no explicit policies in the London Plan to protect car pounds, however, the Land for Industry and Transport SPG does note that sui generis uses that have similar characteristics to B-Class uses (including land for transport functions) fall within an industrial definition and should be considered in the same light. In this instance, there are no strategic concerns in relation to the loss of this facility, given the low number of jobs and the priority to be afforded to higher density uses, including housing in such central locations near to public transport.

### Summary

28 Subject to the re-provision of community facilities, and the introduction of workspace units on site, the proposed mixed-use residential led development of the site is acceptable in strategic planning terms.

## Employment

29 The proposal seeks to provide a significant amount of employment floorspace, totalling 5,175sq.m. to be provided over a range of land uses (Classes B1 (a, b and c), D2, A1, A2, A3 and A4). The London Plan promotes a town centre first approach and Policy 4.7 'Retail and Town Centre Development' states that the scale of any retail, commercial and leisure provision should be related to the size, role and function of the existing town centre and its catchment. The site is an out of town centre location and is not identified by Council as being part of a local parade or neighbourhood centre. Given the increase in main town centre uses proposed in the scheme (over 2,500sq.m. of retail, office, employment floorspace) the impact of the development on Fulham Town Centre needs to be assessed in accordance with NPPF paragraph 26 in order to justify the possible introduction of retail/town centre uses on this site.

30 The applicant has submitted a Town Centre Assessment to accord with NPPF requirements. This assessment concludes that the proposals would not have a significant adverse impact, and therefore complies with the tests set out in the NPPF. GLA officers are satisfied that the development will not have a negative impact on Fulham Town Centre or any neighbourhood centres.

31 London Plan Policy 4.1 'Developing London's Economy' provides strategic support for the provision of employment floorspace and seeks to ensure the availability of sufficient and suitable workspaces in terms of type, size and cost. The applicant is proposing to provide up to 4,054sq.m. of flexible commercial units (300sq.m. each and capable of sub-division) which are anticipated to be suitable for a range of B1 business activities including offices, studios and light industrial, as well as a maximum of 575sq.m. of Class D2 leisure uses.

32 The applicant is proposing a maximum of 3,500sq.m. of flexible B1 floorspace in the form of workspaces. The London Plan promotes mixed-use developments as a general principle, and mixed-use developments with office provision are particularly encouraged by London Plan Policies 4.2 'Offices' and 4.3 'Mixed use developments and offices'. However, as set out in paragraph 7.1.3 of the Housing SPG, such developments, in locations which may be marginal or unviable for commercial activity should be informed by realistic assessments of the commercial components of the housing-led development. The applicant has submitted an Economic and Employment Land Statement that evaluates the appropriateness of the provision of mixed-use scheme and the provision of commercial floorspace. The Council should secure through the section 106 agreement that affordable and modern workspaces will be provided to ensure the commercial units are occupied, well-used and have realistic rents.

## Housing

### Housing choice

33 London Plan Policy 3.8 'Housing Choice' encourages a choice of housing based on local needs, while affordable family housing is stated as a strategic priority. Policy 3.11 also states that priority should be accorded to the provision of affordable family housing. The proposed indicative mix submitted by the application is outlined below.

<b>Tenure</b>	<b>Private</b>	<b>Intermediate affordable</b>	<b>Affordable rented</b>	<b>Total (and %)</b>
1 Bed flat	13	15	4	32 (27%)
2 Bed flat	31	12	6	49 (41%)
3 Bed flat	14	5	5	24 (20%)
4 Bed flat	~	~	1	1 (1%)
4 Bed house	8	~	~	8 (7%)
5 Bed house	5	~	~	5 (4%)
<b>Total</b>	<b>71</b>	<b>32</b>	<b>16</b>	<b>119</b>
	<b>60%</b>	<b>40%</b>		

34 The proposal indicates that there will be a range of dwelling sizes which is welcome. The provision of 32% (38 units) of family sized dwellings is supported and welcome by GLA officers.

35 London Plan Policy 3.3 'Increasing housing supply' affirms the Mayor's determination to work with relevant partners to increase London's housing supply by an average of 42,000 net additional homes to meet the need identified in the plan, enhance the environment, improve housing choice and affordability, and to provide better quality accommodation for Londoners. To achieve that figure, the London Plan has set an annual target of 1,031 additional dwellings in Hammersmith and Fulham for the ten-year period from 2015 to 2025. Therefore the provision of dwellings in the proposal is supported in strategic planning terms.

#### Density

36 London Plan Policy 3.4 'Optimising Housing Potential' states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. The site is within an urban location where the density matrix sets a guideline of 200 to 700 habitable rooms (or 45 to 260 units) per hectare on a site such as this where the PTAL is 4, although the London Plan notes that these ranges should not be applied mechanistically.

37 The applicant has provided a density figure of 86 units per hectare. However, as the proposal is for mixed use development the density calculations need to be undertaken in accordance with paragraph 1.3.47 of the Housing SPG. The proposal has 119 units on a site area for density purposes of 1.05 hectares. This equates to 113 units per hectare. This falls within the ranges set out in the London Plan which is supported.

#### Residential quality

38 London Plan Policy 3.5 promotes quality in new housing provision and sets out minimum space standards at Table 3.3. As of 1 October 2015 the Government's technical housing standards came into effect. The Mayor intends to adopt the new technical guidance through a minor alteration to the London Plan. In advance of this the Mayor has released a policy statement setting out that from 1 October 2015 the relevant London Plan policy and associated guidance in the Housing SPG should be interpreted by reference to the nearest equivalent new national technical standard.

39 Whilst it is noted that the internal layout for the application is only indicative at this stage and will be finalised for the reserved matters stage, the applicant has indicated that they will be aiming to achieve a high level of residential quality. It is anticipated that 76% of all units will be dual aspect, all dwellings will be provided with outdoor amenity space and that a maximum of six units will share the same core, which is welcome. The illustrative dwelling layouts indicate that all units will meet or exceed the Mayor's minimum space standards set out in Table 3.3 of the London Plan.

40 The high residential quality should be ensured as the layouts are finalised as part of the reserved matters. Further analysis of the residential quality is detailed under 'urban design' below.

#### Children's playspace

41 London Plan Policy 3.6 'Children and Young People's Play and Informal Recreation Facilities' seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's Supplementary Planning Guidance 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site as a minimum.

42 The applicant has indicated that 466sq.m. of playspace will be provided adjacent to Block E, in accordance with the requirements set out in the Shaping Neighbourhoods: Play and Informal Recreation SPG which is welcome. The playspace location is adjacent to an existing play facility which is strongly supported. The applicant is encouraged to enter discussions with Hammersmith and Fulham Council about how these two facilities can be integrated. Connection between these two playspace facilities will be essential to ensure the functionality of the playspace.

### **Affordable housing**

43 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so each council should have regard to its own overall target for the amount of affordable housing provision. This target should take account of the requirements of London Plan Policy 3.11, which includes the strategic target that 60% of new affordable housing should be for social rent and 40% for intermediate rent or sale.

44 While the Mayor has a set strategic investment benchmark that across the affordable rent programme as a whole rents should average 65% of market rents, this is an average investment output benchmark for this spending round and not a planning policy target to be applied to negotiations on individual schemes.

45 Policy 3.12 is supported by paragraph 3.71, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit appraisal might need to be independently verified. Paragraph 3.75 highlights the potential need to re-appraising the viability of schemes prior to implementation in order to take account of economic uncertainties and ensure the maximum public benefit is secured over the period of the development.

46 Hammersmith and Fulham Council has set an overall target as required by London Plan Policy 3.11, and expects 40% affordable housing to be provided on sites where 10 or more dwellings are proposed, however the Council proposes no tenure mix between affordable or intermediate.



47 The applicant is intending to provide 40% of affordable homes with a tenure mix of 67% intermediate and 33% affordable rent. The applicant has indicated that the proposed affordable housing strategy is the outcome of the viability assessment undertaken. It is understood by GLA officers that Hammersmith and Fulham Council are undertaking an independent assessment of the viability report. The findings of this report should be shared with GLA officers prior to the application being referred back to the Mayor.

48 The applicant has indicated that the affordable housing will be provided across a variety of unit sizes which is also welcome. Although it is noted that only 9% of the affordable housing provision are intended to be provided in family sized homes. The applicant intends to provide the affordable housing provision within Block E of the proposal, while intermediate housing will be dispersed throughout Blocks A to D, which is welcome. The intention to provide affordable housing on the same site as market dwellings is strongly supported.

## **Urban design**

49 Given the spatial constraints of the site and the intention to include a mix of uses, the public realm needs to ensure a clear hierarchy of routes and access points across the site. As the landscaping strategy is developed the applicant should ensure the site is clearly legible and pedestrians are afforded priority of vehicle/servicing areas.

50 The proposed layout enables a new east/west pedestrian route through the site, with further connections to the existing street pattern to the north. This will contribute positively towards improved local connectivity and is welcome.

51 The form and massing strategy responds to the surrounding context. The applicant is proposing a range of building heights from three to six storeys, with proposed townhouses in the eastern portion of the site being consistent in scale to the surrounding residential accommodation, which is supported. The stepping back of upper floors reduces the impact of the development of the surrounding area.

52 As the pre application meeting report highlighted, given the modest scale of the proposal, the parameter plans forming the outline application should include a relatively high level of detail, including securing the location of blocks, entry points to both commercial units and residential cores, and the size and extent of both communal and private amenity spaces. As part of this proposal the applicant is seeking approval for the layout, including entrances, and the extent of communal and private amenity space.

53 The applicant should secure details to ensure appropriate design and residential quality outcomes. These details should include minimum contiguous lengths of inactive frontages, maximum core to units ratios of no more than 8 units sharing the same core on each level, minimum space standards, minimum percentage of dual aspect and minimum floor to ceiling heights of 2,500mm. It is noted that the applicant has indicated that 76% of units will be dual aspect which is welcome, however as the internal layout is yet to be confirmed, the design and access statement should set parameters to ensure a high residential quality is maintained throughout the development of the internal layout.

54 The access strategy proposed by the applicant improves access through the site and to the surrounding area. The applicant should provide further details on the interaction between pedestrian, cyclists and vehicles along the shared route locations (Blocks B, C and D; and Block G) and if any pedestrian access will be provided onto Shottendane Road and Barclay Road.

55 The applicant has provided indicative information on the intended architectural appearance of the development. This includes likely facing materials and how these are reflective of the site and its local context, and the indicative floor plans for the residential component also indicate that balconies provided for the apartments will be inset. This approach is supported. The applicant should provide additional information in the design and access statement indicating how they intend to create articulation to vary the building form.

## **Inclusive access**

56 The aim of London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all of us, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

57 The design of the landscaping and the public realm is crucial to how inclusive the development is for many people. As the landscape strategy is developed, the applicant should confirm that the site is accessible for people of all abilities. The proposal should ensure that the routes from public transport facilities to the new entrances are legible and clearly identifiable, and that way finding is clear to make access easy, safe and comfortable. Any future landscape strategy should provide details of regarding levels, gradients and surface materials of paths and how they are providing segregation from traffic and turning vehicles, and how any level changes in the routes will be addressed. Details of how pedestrians will be segregated from vehicles will be particularly important along the shared route located out the front of Blocks B, C and D and along Block G.

58 Pedestrian access from the nearest public transport nodes (including Parsons Green Station), should be inclusive and usable for a range of users, including disabled people. The applicant should provide suitable crossing points (including dropped kerbs and correctly designed tactile paving), suitable path widths and surface finishes. They should demonstrate that accessible and inclusive routes are provided to ensure that people can easily access the proposed development.

59 In accordance with London Plan Policy 3.8, the applicant has confirmed that all of the residential units will meet Lifetime Homes standards, and that 10% of units to be wheelchair accessible or easily adaptable which is welcome. The applicant should provide details on where these units will be located and ensure they are provided across a range of tenure types, so as to afford disabled and elderly people similar choices as non-disabled people. Typical layouts for wheelchair units should also be included in the design and access statement.

60 As set out in the Mayor's Housing Standards Policy Transition Statement, the Council should secure compliance with building regulations M4(2) and M4(3) by condition.

61 The Housing SPG provides further guidance regarding wheelchair accessible housing and parking, suggesting that one space per wheelchair unit is expected (i.e. 12 spaces). It is understood that the applicant is intending to provide 10 blue badge parking spaces. As this does not meet the policy requirements for 1:1 blue badge parking to wheelchair units, the applicant should provide robust justification as to why they are not meeting the policy requirements. Plans of the proposed layout should also clearly indicate the proximity of the blue badge parking spaces to the wheelchair accessible housing. The applicant should include a mechanism to ensure that the supply and demand of the accessible bays are regularly monitored and provision reviewed, to ensure that provision equates to the demand from disabled residents and visitors and that the bays are effectively enforced.

## **Sustainable development**

### Energy

62 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole.

63 Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.

### Energy efficiency standards

64 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include mechanical ventilation with heat recovery and variable speed drives.

65 The demand for cooling will be minimised through overhangs from balconies and openable windows (with acoustic buffers). The applicant has stated that the development meets Part L criterion 3 on overheating with a low to medium risk of high temperatures in summer. This is not considered sufficient to demonstrate that the dwellings are not at risk of overheating and to demonstrate compliance with Policy 5.9. Any dwellings showing a risk of high temperatures in summer above 'slight' should be reviewed and additional information passive measures integrated to address overheating risk. The applicant should provide information demonstrating how the cooling hierarchy in Policy 5.9 has been followed as part of the design and providing evidence to demonstrate that overheating risk has been properly addressed. Dynamic thermal modelling in line with CIBSE TM52 and CIBSE TM49 is recommended. At the very least Par'L compliance checklists should be provided confirming that the risk of high temperatures in summer is 'slight' or lower, based on reasonable assumptions for ventilation.

66 The applicant has stated that the non-domestic elements of the development are expected to require cooling. Evidence should be provided to demonstrate that the units have been designed in line with Policy 5.9 in the interest of minimising cooling demands.

67 The development is estimated to achieve a reduction of 24 tonnes per annum (9%) in regulated CO<sub>2</sub> emissions compared to a 2013 Building Regulations compliant development. Sample DER and TER sheets have been provided. BRUKL sheets including efficiency measures alone (i.e. excluding PV) should also be provided to support the savings claimed under this step of the energy hierarchy (please note that savings from heat recovery are accounted for in this tier rather than the 'be clean' tier).

### District heating

68 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

69 The applicant is proposing to serve all apartments and commercial elements of Blocks A to E via a communal heating network. The applicant, however, states that the townhouses and standalone blocks will be served by individual boilers. An illustrative plan showing the route of the heat network linking all relevant buildings should be provided.

70 While it is accepted that the houses in Block G are too far from the rest of the development to justify the connection to the site heat network, Block F and other blocks are all in close proximity so it is expected that these will all be linked to the site heat network.

71 The site heat network will be supplied from a single energy centre located in the basement between Blocks B and C.

72 The communal heating system will be served by communal gas boilers. The houses will be served by individual boilers.

#### Combined heat and power

73 The applicant has investigated the feasibility of CHP. However, due to the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

#### Renewable energy technologies

74 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install solar thermal panels on the roof of the houses and solar PV on the roof of all other buildings. A roof plan showing the proposed installation of PV has been provided. A plan should also be provided identifying the location of the solar thermal and whether there are any issues with pitch and orientation to be considered to optimise output.

75 Information should be provided on the size of the proposed solar thermal and solar PV installation. Enough information should be provided to support the savings claimed.

76 The applicant has also stated that air source heat pumps will be considered for the non-domestic elements. It is unclear whether these have been included in the carbon savings calculations. This should be clarified. The applicant should also clarify whether the air source heat pumps would be used for cooling only or also for heating.

77 A reduction in regulated CO<sub>2</sub> emissions of 77 tonnes per annum (28%) is claimed through this third element of the energy hierarchy.

#### Overall carbon savings

78 Based on the energy assessment submitted at stage 1, the table below shows the residual CO<sub>2</sub> emissions after each stage of the energy hierarchy and the CO<sub>2</sub> emission reductions at each stage of the energy hierarchy.

	Total residual regulated CO <sub>2</sub> emissions	Regulated CO <sub>2</sub> emissions reductions	
	(tonnes per annum)	(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building regulations	275		
Energy Efficiency	251	24	9%
CHP	251	0	0%
Renewable energy	174	77	28%
<b>Total</b>		<b>101</b>	<b>37%</b>

79 A reduction of 101 tonnes of CO<sub>2</sub> per year in regulated emissions compared to a 2013 Building Regulations compliant development is claimed, equivalent to an overall saving of 37%.

80 The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan, however the comments above should be addressed before the carbon dioxide savings and compliance with London Plan energy policy can be verified.

#### Flood risk

81 The Flood Risk Assessment (FRA) has been prepared by Civil Engineers. The FRA confirms that the site is within Flood Zone 3a but is protected to a high standard from tidal flooding by existing flood defences.

82 The south west element of the site is generally free from any significant surface water flood risk; however, the north eastern element of the site is located within a high surface water flood risk area, as shown on an EA map extract contained within the FRA itself.

83 Although this surface water flood risk is acknowledged in some parts of the FRA, in other sections the FRA erroneously states that the risk of flooding from all other sources is low. The risk is high being defined as greater than 1 in 30 year risk of flooding.

84 Therefore the FRA should be corrected to consistently acknowledge this risk, and to provide a more detailed justification of the proposed mitigation measures. It may be that raising of ground floor levels in combination with the other proposed mitigation measures is a suitable approach but without a more detailed consideration of likely flood levels versus proposed ground levels it is not possible to determine whether or not the proposals comply with London Plan Policy 5.12.

85 The applicant should provide this information and analysis prior to any stage 2 referral to the Mayor.

#### Sustainable drainage

86 There are significant areas of high surface water flood risk affecting the north eastern corner of the site and extensive areas within the local vicinity, therefore the application of London Plan Policy 5.13 will be an important consideration for this site.

87 The FRA states that the proposals will result in an overall reduction in man-made surfacing and will achieve at least a 50% reduction in surface water discharge by using a range of SUDS techniques; however these are not yet defined.

88 In principle, this approach is an acceptable implementation of London Plan Policy 5.13; however a suitable planning condition should be applied to any planning permission requiring the approval of the sustainable drainage regime by Hammersmith and Fulham Council Lead Local Flood Authority. The techniques used should be focused toward to the top of the sustainable drainage hierarchy contained within London Plan Policy 5.13.

#### Climate change adaptation

89 Hammersmith and Fulham Council should secure through planning condition that the application responds to strategic policies regarding climate change adaptation, including use of low energy lighting and energy efficient appliances, metering, high levels of insulation, low water use sanitary-ware and fittings, in addition to biodiverse roofs.

## Transport

### Transport assessment

90 Although there is limited explanatory assessment of modal split and trip generation, it nonetheless contains acceptable details; the Transport Assessment (TA) methodology is acceptably robust. The applicant is however requested to clarify the exact predicted vehicle movements in the peak (AM) hour given the discrepancies identified between the TA's content and conclusion, also the number and proportion of van and larger servicing vehicles should be clearly given as a single total figure for the future post-development situation as well as the existing development. The traffic survey counts supplied for local streets are welcome, albeit these streets are not under the jurisdiction of TfL.

### Car parking

91 The documents presented indicate a provision of 0.5 spaces per apartment and 1 space per townhouse; clarification of the total basement spaces provision is requested as it varies between 55, 56 and 57 in different documents. There are a further 9 on-plot spaces for the townhouses and 7 on-street (on-site) spaces for parking for the commercial units. This represents an uplift of up to 13 spaces from the current provision, albeit the residential use led proposals will mean an overall decrease in movements/trip rate compared to the current situation where all buildings are in commercial use.

92 While it is appreciated this level of parking is within the London Plan standards, given the site's good access to public transport, there is scope for considering a reduction in residential provision, taking account of parking ratios recently approved for neighbouring and/or comparable schemes with good public transport access. Car club spaces have previously been discussed and it is disappointing that there is no reference to such provision or impediments encountered to providing a car club space on site as part of the submission. Further information/justification is therefore required.

93 The applicant has committed to providing the minimum standard of electric vehicle charging points (EVCPs), namely the provision of 20% active and 20% passive provision for residential and 10% for the other uses on site. Adequate levels of parking for blue badge holders should also be provided in accordance with London Plan Policy 6.13, this should equate to 12 residential spaces, and at ground floor, one for commercial staff. Provision of a dedicated blue badge space for visitors at ground floor (west end of the site) is also strongly recommended. The commitment to a car-and-permit free arrangement for residents and commercial users (to prevent them parking in public designated bays) is welcome.

94 The TA and accompanying framework Car Parking Management Plan provide the acceptable level of detail at this outline stage of how all parking spaces will be allocated and managed, although it is a concern that parking is currently intended to be marked out by a change in materials and it is not fully clear where on-street parking will be located and managed to allow for unimpeded and safe progress through the site by pedestrians and cyclists. Further comments are given in the 'walking and cycling' section below. In any case, a detailed plan for car parking management that resolves these issues, to be submitted and approved prior to occupation, should be conditioned.

### Cycle parking

95 Cycle parking for the development should be provided in accordance with the minimum standards as set out in Table 6.3 of the London Plan. The total quantum will depend on the mix of unit sizes. The applicant has committed to provide spaces to this standard, as well as shower(s) and changing space for commercial unit staff, which is welcome. All cycle parking facilities should be located where they can be accessed safely and conveniently by cyclists, designed in line with the latest London Cycle Design Standards (LCDS), and include larger spaces for disabled cyclists.

### Highways and public transport impacts

96 It was discussed at the pre application stage that there will be reduction in the number and sizes of vehicles accessing the site as a result of the proposals. This slight reduction overall has been borne out by the trip generation exercise. Therefore detailed traffic modelling of the TLRN and SRN is not required.

97 It is also accepted that the development is unlikely to impact negatively on buses either physically or in terms of capacity, nor on Parsons Green Station. However, construction impacts would need to be considered as there are some developments planned for construction in this area that may increase bus journey times (construction is dealt with below).

### Pedestrians and cycling

98 The provision of a new pedestrian and cycle connection from east to west is strongly supported as it will improve accessibility to/from the site and connectivity for pedestrians and cyclists through the area. The central vehicle-free path in this particular section should be wide enough to safely accommodate both pedestrians and cyclists and provide an attractive route for both users.

99 Although swept paths have been supplied for delivery vehicles and a large car moving into, within and exiting the site, the level of plan detail is insufficient to assess whether cyclists and pedestrians can pass safely through the site in the width-limited internal private roads. A safety audit at the next stage for the Parsons Green Lane exit is therefore recommended now, or failing that, a reserved matter submission together with a second road safety audit for the new ramped access area near the exit onto Harbledon Road.

100 A cycle level of comfort assessment informs severance issues for cyclists cycling to/from the site and can be used to support and influence borough plans to improve cycling conditions in the area. Also included in the TA is a Pavement Comfort Assessment, which is considered acceptable in its scope and conclusions, though there does not appear to be an accessibility audit of the two closest bus stops on Fulham Road in line with London Plan Policy 6.7. Prior to the submission of the first reserved matter, a more detailed PERS audit would be expected.

101 Whilst the outline nature of the proposal is noted, access approval is being sought and therefore the applicant is requested to submit prior to determination further detail on what was requested at the pre application stage. The requests included an on-site 3 metre minimum wide shared path, and the need to account for edge conditions and flows of pedestrians and cyclists (including at peak times). This advice is also referenced in the London Cycling Design Standards, section 4.5.7.

### Travel planning and construction

102 The single generic framework Travel Plan supplied was assessed using the ATTRIBUTE assessment tool, following recent discussion with the applicant a commitment has been given to revise it before planning determination to supply the required level of detail and to divide the report into a residential and a workplace travel plan, so that different travel patterns for the different land uses can be addressed.

103 Measures to support reduced car parking provision including a range of green travel planning initiatives should be secured, monitored and funded through the eventual section 106 agreement. These could include but are not limited to: subsidised Oyster cards; cycle vouchers/free bicycles; subsidised car membership; marketing and promotional events. An appropriate figure, to fund the provision of travel plan measures should be agreed with the Council.

104 The supplied framework Demolition and Construction Logistics Plan and Construction Management Plan (CMP) are each welcomed and their content fit for purpose. They identify that special measures to protect the adjacent railway line and associated infrastructure will be necessary; these should be worked up in consultation with London Underground Infrastructure Protection prior to implementation and in conjunction with the production of full detailed plans. It should be secured by condition to be discharged in consultation with TfL.

### Delivery and servicing

105 Any vehicles undertaking a refuse collection or any delivery and servicing activity for the townhouses to the east will enter from Barclay Road; a turning head will allow vehicles to perform a three point turn before exiting into Barclay Road in a forward gear. Vehicles undertaking a collection of refuse and servicing activity for the apartments or commercial units will use the main entrance on Parsons Green Lane and, because there is no turning room on this narrow site, will exit onto Harbledon Road using a modified access restricted to exit only. This will permit a straight-on movement –as well as the current left turn – onto Harbledon Road.

106 A good framework delivery and servicing plan (DSP) has been provided and its content is considered acceptable for this stage. The final, detailed document should be secured by condition.

### Planning obligations and the community infrastructure levy

107 In accordance with Policy 3.8 of the London Plan, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1 April 2012. All new developments that create 500sq.m. or more of additional floorspace are liable to pay the Mayoral CIL. The levy is charged at £50 per square metre of additional floorspace in the London Borough of Hammersmith and Fulham.

## **Local planning authority's position**

108 It is understood by GLA officers that Hammersmith and Fulham Council is likely to report this applicant to its planning committee in March 2016.



## Legal considerations

109 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## Financial considerations

110 There are no financial considerations at this stage.

## Conclusion

111 London Plan policies on retail and town centre uses, employment, housing, affordable housing, urban design, inclusive design, sustainable development and transport are relevant to this application. In general the scheme is supported in strategic planning terms. However, further information and discussion, as stated below, is required to ensure the proposal complies with the London Plan:

- **Principle of development:** Subject to the re-provision of community facilities, and the introduction of workspace units on site, the proposed mixed-use residential led development of the site is supported in strategic planning terms. Overall this is an excellent example of the use of public land holdings to deliver jobs and homes for Londoners.
- **Employment:** The increase in employment capacity on the site is supported.
- **Housing:** The housing choice and density are generally supported in strategic planning terms. Hammersmith and Fulham Council should include conditions to secure the high residential quality indicated in the outline submission.
- **Affordable housing:** The applicant is intending to provide 40% affordable housing which is welcome. The Council's independent assessment of the applicant's viability report should be supplied to GLA officers prior to the application being referred back to the Mayor.
- **Urban design:** The level of detail including in the outline planning application is welcome. GLA officers request additional information regarding the access for pedestrians with particular regard to the shared surface areas. Further details (outlined in the body of this report) are required to secure a high residential quality and architectural form for the proposal.
- **Inclusive access:** The applicant should make note of the comments made in this report and consider the matters raised as the reserved matters are finalised. As set out in the Mayor's Housing Standards Policy Transition Statement, the Council should secure compliance with building regulations M4(2) and M4(3).

- **Sustainable development:** Further information and discussion (detailed in the body of this report) are required before the proposals can be considered acceptable and the carbon dioxide savings verified. The proposal does not comply with London Plan Policy 5.12 'Flood Risk' and further work is required. This information should be submitted for assessment before the application is referred back to the Mayor. Conditions securing commitment for climate change adaption measures should be included within the application when it is referred back to the Mayor.
- **Transport:** The applicant is required to further clarify and justify the level of residential car parking, and preferably reduce the amount to reflect the site's accessibility while also exploring the feasibility of introducing measures to improve cycle and pedestrian amenity/safety on-site and undertake safety access audit(s). Planning conditions are required to secure a car parking management plan, DSP, DCLP and CMP, with both a residential and workplace travel plan secured by the section 106 agreement.

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