GREATER**LONDON**AUTHORITY

planning report D&P/3685/01

22 March 2016

Oaklands, Old Oak Common

in the London Borough of Hammersmith and Fulham

(Old Oak Park Royal Development Corporation)

planning application no.15/0091/FUL

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

Redevelopment of the Oaklands House site to provide 3 mixed-use blocks ranging in height from 6 to 26-storeys. Comprising 611 residential units and 3,500 sq.m. of flexible commercial floorspace (A1, A2, A3, A4, B1, D1 and D2).

The applicant

The applicant is **Genesis** and **QPR**, and the architect is **CZWG**.

Strategic issues

The strategic issues in relation to this application are the **regeneration** of the Old Oak Common area, the provision of **housing** and **affordable housing**, **density**, **urban design**, **inclusive access**, **climate change** and **transport**.

Recommendation

That the Old Oak Park Royal Development Corporation be advised that the proposal is supported in principle. However the additional information requested in paragraph 83 must be submitted to ensure the proposal complies with London Plan policies.

Context

1 On 2 February 2016 the Mayor of London received documents from the Old Oak Park Royal Development Corporation 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 17 March 2016 to provide the Old Oak Park Royal Development Corporation 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 1A and 1C of the Schedule to the Order 2008:

- Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.

- Development which comprises or includes the erection of a building more than 30 metres high and is outside of the City of London.

3 Once the Old Oak Park Royal Development Corporation 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 or allow the Old Oak Park Royal Development Corporation to determine it itself, unless otherwise advised. In this instance if the Old Oak Park Royal Development Corporation resolves to refuse permission it need not refer the application back to the Mayor.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 This site is located within the Old Oak and Park Royal opportunity area and development corporation boundary. The 1.18 hectare site is bounded by the London Underground Railway line to the west, a triangle shaped piece of Network Rail land to the north which separates the site from the Grand Union Canal, Network Rail land to the east and the access road for the Crossrail Depot site to the south.

7 The closest part of the Transport for London Road Network (TLRN) is the Gypsy Corner junction of the A40 which lies approximately 1.2 kilometres to the south west. The nearest part of the Strategic Road Network (SRN) is Harlesden High Street approximately 1 kilometre to the north. The site entrance is 900 metres from Willesden Junction station which provides services on the Bakerloo Line, North and West London Lines and London Overground to Watford Junction. It is also within 150 metres walk of bus stops on routes 228 and 266. Therefore the public transport access level (PTAL) at the site entrance is currently 3 on a scale of 1 to 6b where 6b is the most accessible. However the PTAL drops to 2 within the site itself. North Acton station providing access to London Underground Central Line is 1kilometres from the site and so does not count towards the PTAL.

Details of the proposal

8 Permission is sought to redevelop the Oaklands House site to provide 3 mixed-use blocks ranging in height from 6 to 26-storeys. Comprising 611 residential units of which 33% will be affordable housing and 3,500 sq.m. of flexible commercial floorspace (A1, A2, A3, A4, B1, D1 and D2). Including 120 underground car parking spaces, 1,080 cycle spaces, amenity space, landscaping and associated public realm.

9 A new site access road is also proposed linking the existing access road and Old Oak Common Lane. In the future this road will connect to a bridge that will cross the Grand Union Canal into the Old Oak North area. This will unlock a large area of the opportunity area for redevelopment.

Case history

10 A series of pre application meetings between the applicant, the OPDC and the GLA have taken place over the last 18 months. During this time the parameters of the scheme, mix of uses and design of the proposal has been refined and revised by the applicant in response to the feedback from the OPDC and GLA officers.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Principle of development — *London Plan; Old Oak Common Park Royal OAPF*
- Regeneration — *London Plan; the Mayor's Economic Development Strategy*
- Housing — *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Density — *London Plan; Housing SPG*
- Urban design — *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Tall buildings/views — *London Plan, London View Management Framework SPG*
- Inclusive access — *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Climate change — *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*

12 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 London Plan Consolidated with alterations since 2011).

13 The following are also relevant material considerations:

- The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance.
- The Old Oak Park Royal OAPF 2015.
- The OPDC draft Local Plan February 2016.
- The Hammersmith and Fulham draft Local Plan 2015.
- The Hammersmith and Fulham Core Strategy 2011 and Development Management Local Plan 2013.

Principle of development

14 The site is located in the Old Oak Park Royal Opportunity Area. Policy 2.13 of the London Plan seeks developments in opportunity areas to optimise development outputs and densities, provide necessary social and other infrastructure to sustain growth, support wider regeneration and realise the scope for intensification associated with proposed improvements to public transport

accessibly. It also states development should contribute towards meeting the minimum guidelines for housing and employment estimates.

15 Also relevant are policies 3.3 and 3.4 of the London Plan which seek to increase the supply of housing and optimise the housing potential of developments.

16 The Old Oak Park Royal OAPF identifies Old Oak Common as capable of providing a minimum of 24,000 new homes and 55,000 new jobs. Whilst the London Plan sets Hammersmith and Fulham Council an annual new homes target of 1,031. The provision of 611 residential units is therefore strongly supported by strategic planning policy.

17 The provision of 3,500 sq.m. of commercial floorspace is supported by policies 2.13, 4.1 and 4.3 of the London Plan and the objectives in the Old Oak Park Royal OAPF (pages 68-69).

Housing

Affordable housing

18 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 local planning authoirty 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 include the strategic target that 60% of new affordable housing should be for social rent or affordable rent and 40% for intermediate rent or sale.

19 London Plan policy 3.12 is supported by paragraph 3.71, which urges the local planning authorities to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit or other recognised appraisal methodology is recommended for this purpose. Paragraph 3.75 highlights the potential need for re-appraising the viability of schemes prior to implementation in order to take account of economic uncertainties and ensure that maximum public benefit is secured over the period of the development.

20 Of the 611 residential units 202 (33%) will be affordable units. The affordable units will be provided as 61 social rent units, 61 affordable rent units and 80 shared ownership units. The remaining 409 units will be privately rented (PRS) and retained by the applicant – Genesis. The applicant's financial viability assessment and the OPDC's independent appraisal should be submitted to GLA officers for inspection before the application is referred back to the Mayor to ensure the proposal provides the maximum reasonable amount of affordable housing.

21 In line with the guidance contained in paragraphs 3.1.24 and 4.4.40 of the Housing SPG; the S106 agreement should secure by way of covenant; the long term retention of PRS units. Given that the financial viability assumptions have been run assuming the provision of PRS, the S106 agreement should also include a claw back mechanism to recoup the affordable housing contribution if the units are sold out of the long term PRS market.

Housing choice

22 London Plan Policy 3.8 and the associated supplementary planning guidance promote housing choice and seek a balanced mix of unit sizes in new developments. The Housing SPG suggests that local policies requiring a range of unit sizes could be applied flexibly to long term PRS schemes in higher density developments on the edge of town centres or transport nodes to reflect demand and the distinct viability challenges faced by long term PRS when competing with traditional for market sale. The indicative mix submitted by the applicant is detailed below.

	Market	**Intermediate**	**Social & AR**	**Total**
1-bed (2 persons)	113	9	21	**143**
2-bed (3 persons)	36	21	18	**75**
2-bed (4 persons)	259	50	64	**373**
3-bed (5 persons)	1	-	19	**20**
Total	**409**	**80**	**122**	**611**

23 The allocation of large family units to the social and affordable rented tenures is supported as is the omission of studio units. Given the site's location and the advice in the Housing SPG the mix is acceptable in strategic planning terms.

Child playspace

24 Policy 3.6 of the London Plan sets out that "development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs." Using the methodology within the Mayor's supplementary planning guidance 'Shaping Neighbourhoods: Play and Informal Recreation SPG the applicant anticipates that there will be approximately 163 children within the development.

25 The applicant has submitted a full play strategy in the design and access strategy which audits the existing play and open space facilities in the surrounding area. This confirms that there is no play provision in the surrounding area for children aged 0 -5 within 100 metres of the development and for children aged 5-11 within 400 metres of the site. It also confirms that Wormwood Scrubs Park is well within an 800 metres walking distance of the site and can provide playspace for children aged 12 and up.

26 Playspace for the 138 children aged 0-11 must therefore be provided on site. At present the applicant is showing all general amenity space as playspace. The statement by the applicant that the proposal provides 1,620 sq.m. of child playspace is therefore misleading. Whilst GLA officers accept general amenity space is often playable the designated child playspace appears to be limited to the podium between blocks B and C. The size of this area of playspace should be confirmed to GLA officers before the application is referred back to the Mayor. OPDC should also consider how it will condition the provision of playable elements in the other amenity spaces to ensure they are genuinely playable if they are to be used to meet the play space requirements.

27 The Old Oak Park Royal OAPF makes clear that given the shortage of amenity space in the opportunity area and the scale of development each development coming forward should accommodate its own recreational demand on site.

Density

28 The site has a Public Transport Accessibility Level (PTAL) of 3 to 2 (on a scale where 6b is the highest). Usually (and in reference to the density matrix contained in table 3.2 of the London Plan) this would restrict development to a density of around 240 units per hectare. However London Plan paragraph 2.62 states that with regard to opportunity areas the scope for larger areas to determine their own character should be fully realised in terms of densities, including those towards the top of the relevant density scale where appropriate. This is particularly important given the relatively high density of the scheme and the number of children expected to be living within the development.

29 The Old Oak Park Royal OAPF identifies the site as suitable for residential densities of 550 units per hectare. This increased density is linked to the new High Speed 2, Crossrail 1 and Great Western mainline station proposed at Old Oak North. As such the proposed residential density of this scheme at 518 units per hectare is acceptable.

Urban design

Layout

30 The scheme is laid out in response to proposed and emerging routes and spaces set out in the Old Oak Park Royal Opportunity Area Framework and its success relies on the wider area being redeveloped accordingly.

31 The layout reflects the importance of the proposed Genesis Road and creates a simple and well defined building line which is well populated with residential foyers and commercial units along it, ensuring it will feel safe and inviting through all times of the day. Building A is chamfered in its southern corner responding to pedestrian desire lines and creating additional public realm where Genesis Road and Old Oak Common Lane converge. Whilst this set back is only on the lower floors and the building above over-sails this space, the height of the under croft and spacing between the columns ensures this feels like a public space and ensures views across the space are not obstructed.

32 The southern edge of the proposal also creates a strong building line on to the Old Oak Common Lane. This is set back allowing for a generously planted public realm along here and allowing for views of Building A when approached from the east which is welcomed. The ground floor is occupied by commercial uses, a residential core and a small number of apartments. The location of apartments facing this busy street is concerning, in particular if this results on them having a number of bedrooms at street level, as this would undermine their quality as well as the quality of the frontage on to the public realm. If residential uses are the only uses which can be located here, the applicant is encouraged to consider and alternative typology, where these units are self-contained two storey maisonettes, locating the more sensitive occupations such as bedrooms at first floor level and providing them all with a direct entrance from the public realm.

33 The proposed north-south pedestrian route between Blocks B and C is provides additional permeability through the area. Block B locates entrances to two cores and internal amenity space fronting on to this space and Block C a large row of apartments. In order to ensure this space feels well used the apartments looking on to the space from Block C all need to have direct access on to this space, ideally these would be their main addresses, with front doors and post-boxes to ensure they are used as such. The recently completed residential scheme in Elephant & Castle by Lend Lease is a good example of this approach.

Residential quality

34 The residential quality of the scheme can be improved. Whilst a number of cores serve more than the recommended number of units on each floor, this is mostly limited to the lower floors and does not go over nine units around each landing. Block A1 however does include 9 units on all floors which is disappointing. Only one of the core benefits from natural daylight and ventilation, as all others are centralised with in the blocks. Further information on how the landings have been designed to ensure their overall quality is not compromised by the higher than recommended number of units and lack of natural daylight and ventilation to them.

35 The proportion of dual aspect units is maximised throughout the scheme by the provision of through units at the end of each corridor which is welcomed, but further information needs to be provided on the overall percentage of dual aspect units on each floor of the scheme. Confirmation that all units meet the London Plan Space Standards and have at least 2.5 metre clear floor to ceiling heights is also required.

36 As set out previously, a number of bedrooms are located at street level facing Old Oak Common Lane. This significantly undermines the quality of these rooms as well as the frontage on to the public realm. The applicant should consider an alternative typology along here of either two storey maisonettes or more commercial space at ground level.

37 As discussed under 'transport' below, the Crossrail depot will be an operational facility from May 2017, with 24 hours a day, 7 days a week access, which will impact on the future residential quality of the development. London Plan Policy 7.15 sets out how noise impacts should be minimised and mitigated and the applicant should provide further detail on this.

Height and massing

38 The massing of the scheme reflects the high density being proposed. The overall height is considered acceptable, given the changing context of the area. The distribution of massing on the site is also supported, with a taller element on the convergence of Genesis Road and Old Oak Common Lane contributing to the legibility of the area. The lower height of block B3 will ensure the single aspect flats facing the courtyard will receive enough daylight which is welcomed given the tightness of this courtyard.

Appearance

39 The use of brick as the main cladding material is strongly supported, providing a robust and long-lasting outer skin to the buildings. The precise choice of brick and quality of detailing will be critical to the final appearance of the scheme, and more detail on this is required, including specific materials being proposed and 1:50 example details. The local authority will be required to monitor this closely to ensure these are not reduced in quality post-planning permission.

Inclusive access

40 The applicant's design and access statement demonstrates that the principles of inclusive access have been incorporated throughout the scheme. In accordance with the Government's technical housing standards, 20% of units have been designed so that they can be converted for occupancy by disabled occupants to Building Regulations Part M(2) standard. Plans detailing the layout of these units have also been submitted. As such the proposal complies with London Plan policies 7.1 and 7.2.

Climate change

Energy efficiency standards

41 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 low energy lighting with mechanical ventilation with heat recovery.

42 The strategy for reducing the risk of overheating dwellings includes solar control glazing on west facing facades, shading from balconies and dual aspect dwellings. The applicant has undertaken a dynamic overheating assessment using both CIBSE Guide A and CIBSE TM52 methodologies, this is welcomed. The results of the study conclude that with the proposed strategy the development is predicted to meet the CIBSE recommendations for both Guide A and TM52.

43 Comfort cooling is proposed for the office and retail uses. The demand for cooling in the office and retail will be minimised through energy efficient plant and solar control glazing. The applicant has demonstrated that all spaces will comply with the Part L2A solar gain limits.

44 Based on the information provided, the proposed development does not appear to achieve any carbon savings from energy efficiency alone compared to a 2013 Building Regulations compliant development.

45 The applicant should model additional energy efficiency measures, for instance higher heat recovery efficiency on the residential units, and commit to the development exceeding 2013 Building Regulations compliance through energy efficiency alone.

District heating

46 The applicant has identified that development is within the Old Oak Decentralised Energy Strategy which is currently investigating the potential for a district heating network. The development has been identified in Old Oak Decentralised Energy Strategy as potential being within Phase 2 of the network build out with an indicative timescale of 2017-2025 given. The applicant has stated that connection will unlikely be delivered to the site within the 2017-2025 time period outlined due to it being an island site and is therefore proposing a standalone approach design to allow for connection to the heat network in the future. The applicant should prioritise connection to the network contact should be made with the OPDC to determine the current understanding on timescales for the network delivery to the development site. The applicant should then confirm how the timescales align with the development of the network. Should it be anticipated that the network will be delivered within a relatively short period after completion of the development (i.e. 5 years) the applicant should investigate a temporary gas boiler solution rather than installing an on-site low carbon solution. Evidence of correspondence should be provided.

47 The applicant is proposing to install a site heat network. However, the applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network.

48 The site heat network will be supplied from a single energy centre. This will be 350 sq.m. in size and located in the basement of Building B.

Combined Heat and Power

49 The applicant is proposing to install a 360 kW_e /389 kW_{th} gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating (75% of the total heat load). As outlined above connection to the external heat network should first be prioritised over a standalone solution.

50 A reduction in regulated carbon dioxide emissions of 322 tonnes per annum (43%) will be achieved through this second part of the energy hierarchy.

Renewable energy technologies

51 The applicant has investigated the feasibility of a range of renewable energy technologies but is not proposing to install any renewable energy technology for the development as the target in Policy 5.2 is met through CHP. The applicant has however identified that PV would be the most suitable renewable technology to complement the CHP. The inclusion of PV would be welcomed.

Overall carbon savings

52 Based on the energy assessment submitted at stage I, the table below shows the residual carbon dioxide emissions after each stage of the energy hierarchy and the carbon dioxide emission reductions at each stage of the energy hierarchy.

53 A reduction of 308 tonnes of carbon dioxide per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 41%.

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

Flood Risk

55 The site is within Flood Zone 1 and does not have any significant surface water risk. Therefore the proposals are acceptable in terms of London Plan Policy 5:12, although it should be noted that extensive areas of surface water flood risk lie within close proximity of the site.

Surface Water Run-off

56 Drainage is a critical issue across the OPDC. This is because the foul, surface water and combined sewer networks across the area are already at capacity. Furthermore there are already areas at significant surface water flood risk, although this particular site is not directly affected.

57 Therefore an OPDC wide Integrated Water Management Strategy is being produced. Key to this will be the aim of major reductions in surface water discharge from existing sites in order to create capacity in the sewer networks to take foul discharges from the various development sites.

58 The sustainability statement is referred to in the Design & Access statement and comments that, *"A strategy has been developed to reduce water demand through water efficiency, rainwater collection via 'blue roofs', and SUDS strategies for irrigation. Storm water will be attenuated through 'blue roofs'. Surface water run-off will be attenuated through SUDS elements such as storm-water planters, and linear rain gardens.*

59 This approach is in principle acceptable in terms of London Plan Policy 5:13, although the details of the Drainage Strategy have not been seen, therefore a suitable planning condition should be applied to any planning permission. GLA officers suggest the proposed wording:-

"No development shall commence until a sustainable drainage regime meeting the requirements of London Plan policy 5:13 has been submitted to and approved by the local planning authority in consultation with the relevant Lead Local Flood Authority."

REASON: To ensure that sustainable management of water and minimise the potential for surface water flooding."

Transport for London

60 Subject to successful passage of the Hybrid Bill, a new HS2 station will be built at Old Oak Common, to the east of the site. The proposed station is due to open in 2026 and will provide interchange with Crossrail and Great Western rail services. Following public consultation in late 2014, two new London Overground stations have been proposed, one on the North London Line at Old Oak Common Lane to the south west of the site and one on the West London Line at Hythe Road, north of the canal. Public transport access will increase substantially when the new HS2 station is operational and new pedestrian links are opened up in the surrounding area.

61 Vehicle access to the site will be afforded from Old Oak Common Lane to the south of the site via a new priority junction. The development creates a new access road called the 'Genesis Road' through the site, which will serve the development in the interim but will form part of a new primary route through the Old Oak Park area – providing a northeast to southwest route via a new bridge over the Grand Union Canal – to connect to other sites to the north of the canal. The 'Genesis Road' is designed with built-in flexibility to be adapted in the future when needed to function as a primary route and accommodate buses, HGVs along general traffic through the development sites to the north.

62 TfL appreciates how crucial the access road is to the delivery of a new route through site and is generally supportive of the proposed arrangements. However, it is expected that further modifications and refinements such as the signalisation of the junction, and changes to the geometry of the junction might be required in order to respond to increases in traffic flows from development sites to the north. There is a presumption that the proposed junction is in the most suitable location and of optimum design. TfL however requests that additional information on the design process, including the rationale for settling on the current location and design of the junction, be included in the Highway Design Report before confirming acceptability of this proposal. While there is concern regarding the potential difficulties with adapting the road in the future once the loading bays and parking bays are embedded, it is considered this can be addressed through Section 278, which might include an indicative 'end state' highway proposal, thus providing the legal basis to remove/ modify interim parking on the road when required.

63 As advised at pre-application stage, the importance of maintaining access to the Crossrail depot needs to be considered. The depot will be an operational facility and will therefore require access 24 hours a day, 7 days a week. 'Genesis Road' will be shared with the depot. It is therefore essential that access to the depot (during its construction and operation) is not obstructed during the construction of the proposed development. It was also be noted that the Crossrail depot will be operational from May 2017, and from this point, noise and visual impacts on the site will be different from today (while the depot is under construction) and impacts on future residents of the development will therefore need to be considered in greater detail.

64 The applicant should be the mindful of the HS2 proposal to construct a 'logistics tunnel' at a depth of approximately 15 metres beneath the site. The depth and alignment of the

tunnel will have implications for the structure of the proposed buildings. It is therefore imperative that the structural design process take account of the interface of the buildings' foundation with the tunnel corridor. The applicant is therefore advised to liaise with the OPDC and the HS2 team during the structural design process in order to ensure that the final design of the structure of buildings reflects the HS2 proposal.

65 In terms of cycling, the 'Genesis Road' will provide part of a primary east-west cycle route, which will need to be segregated from vehicular traffic. This is not currently included in the proposed design. However, it is considered that the generous width of carriageway will allow the road to accommodate segregated cycle lanes when required.

66 The proposal includes 120 car parking spaces, which equates to 0.2 spaces per dwelling. The level of car parking is consistent with the maximum permissible provision in the Old Oak Park and Park Royal OAPF. However, TfL would support a lower level of car parking in the interest of minimising the impact of the development on the adjoining highway network, which already suffers from significant congestion at peak periods, and promoting the use of sustainable transport modes. The car park is located at basement level and is accessed by a ramp from 'Genesis Road'. TfL expects that future occupiers will be prevented from applying for permits to park in the surrounding controlled parking zone (CPZ). This should be secured through the Section 106 agreement for the site.

67 The car parking includes 20 accessible spaces for blue badge holders of the residential units. The accessible parking spaces are conveniently located adjacent to the lift cores. This level of accessible car parking spaces equates to 3% of the overall residential units and considerably less than 1 space per wheelchair accessible unit encouraged by TfL. Assuming that the proposal is compliant with London Plan policy 3.8 (*"ten per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users"*) 61 accessible parking spaces would need to be provided. The OAPF Principle T3 states that *"disabled parking for residents and visitors will be a priority"*. Five disabled car parking spaces are provided at grade within the 'Genesis Road' for visitors of the commercial use. The on-street accessible parking spaces are acceptable in the interim but may need to be modified as part of the permanent highway design. Disabled parking for staff of the commercial use is required.

68 The proposal includes 5 car club parking spaces. The location of the car club spaces are not indicated on the basement plan. However, this requirement can be secured by legal agreement. A total of 25 electric vehicle charging points (EVCP) will be provided. The proposed EVCPs do not meet the London Plan 20% minimum requirement. The basement plan does not include details of the car parking spaces fitted with EVCPs. The details of EVCPs should be secured by the appropriate legal agreement.

69 A total of 1,080 long stay cycle parking spaces are provided at basement level for the residential use. Whilst this quantum satisfies the London Plan requirement, TfL will be seeking higher standards for all developments in the Old Oak area. The applicant should therefore consider the reallocation of car parking to cycle parking in order to achieve this.

70 The basement plan does not indicate how many cycle parking spaces are accommodated in each cycle store and therefore the level of provision proposed cannot be verified. The proposal is required to provide long-stay cycle parking for staff in accordance with the London Plan. Additionally, the development must include short-stay cycle parking at the level recommended by the London Plan for both the residential and non-residential uses. Details of those should be secured by condition.

71 Supporting facilities such as lockers, showers and changing rooms for long-stay cyclists associated with the retail use is encouraged. Consideration should be given to providing spaces for less conventional bicycle types, such as tricycles, cargo bicycles and bicycles with trailers.

72 TfL recognises that the highway proposal will deliver public realm benefits and view this as a positive contribution to the wider pedestrian environment. Further improvements to conditions for pedestrians and cyclists in the vicinity of the site would nevertheless be welcomed.

73 With respect to the trip generation and net impacts of the development, TfL has highlighted some weaknesses in the methodology and data used. TfL will provide further comments and recommendations of appropriate mitigation measures (if required) once the amended transport assessment has been received

74 The transport assessment includes a basic description of the provisions for servicing and delivery for both the residential and commercial elements of the development which will be accommodated on-street in 'Genesis Road' via three loading bays. Such arrangement is considered acceptable in the interim but would need to be modified to accommodate the permanent highway design. TfL recommends that a full DSP be secured by condition and approved by OPDC prior to occupation of the development.

75 A Construction Logistics Plan (CLP) should be secured for the site by condition. The CLP should include measures to limit the impact of the development during the construction period, and include information on i) booking systems; ii) consolidated or re-timed trips iii) secure off-street loading and drop off facilities. Depending on the timing of construction the CLP will be expected to follow the Construction Logistics strategy for the wider OPDC area.

76 Additionally, applicants and their contractors are encouraged to sign up to the Fleet Recognition Scheme (FORS) which promotes better safety standards during construction. The FORS guidance can be found at http://www.tfl.gov.uk/info-for/freight/safety-and-the-environment/managing-risks-wrrr.

77 The applicant has not submitted a Residential and Workplace Travel Plans. The full Plans will need to be submitted to OPDC for approval prior to the occupation of the development and should include provisions for reviewing and monitoring. The Travel Plan should be secured through the Section 106 agreement.

78 In accordance with London Plan policy 8.3, *Community Infrastructure Levy*, the Mayor commenced CIL charging for developments on 1st April 2012. It is noted that the proposed development is within the London Borough of Hammersmith & Fulham, where the Mayoral charge is £50 per square metre Gross Internal Area (GIA). Further details can be found at: http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy.

Local planning authority's position

79 The applicant has engaged in lengthy pre-application discussions with the OPDC. It is expected that the OPDC planning committee will consider this application in April 2016.

Legal considerations

80 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 Corporation 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 Corporation under Article 6 of the Order to refuse the 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

81 There are no financial considerations at this stage.

Conclusion

82 London Plan policies on regeneration, housing, density, urban design, inclusive access, climate chance and transport are relevant to this proposal.

83 As detailed in the body of this report the principle of development is strongly supported. The provision of housing and commercial floorspace, the proposed density, accessibility and mix of units accords with London Plan policy. The layout, height, massing and proposed materials are supported.

84 However before the application is referred back to the Mayor the following matters need to be addressed.

- The applicant's financial review and the OPDC's independent review will need to be submitted to allow GLA officers to assess whether the proposal provides the maximum reasonable amount of **affordable housing** in accordance with policy 3.12 of the London Plan.

- The draft S106 agreement or Heads of Terms should include a covenant to secure the long term retention of the PRS units and a claw back mechanise to recoup the affordable housing contribution should they be sold out of the long term PRS market. To comply with the guidance in the Housing SPG.

- The residential quality of the development needs to be improved to ensure compliance with the **urban design** policies in chapter 7 of the London Plan.

- The size of the **playspace** between blocks B and C should be confirmed to ensure compliance with the policy 3.6 of the London Plan.

- The outstanding **energy** information should be submitted for assessment to ensure compliance with the policies in chapter 5 of the London Plan.

- The outstanding **transport** information should be submitted for assessment to ensure compliance with policies in chapter 6 of the London Plan.

85 The following should be secured by condition:-

- The details of the drainage strategy to ensure compliance with London Plan policy 5.13.

- Elements of play in the general amenity spaces.

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