21 January 2009

Hammersmith Hospital (Block J)
in the London Borough of Hammersmith & Fulham
planning application no. 2008/03642/OUT

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<thead>
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<th>Strategic planning application stage 1 referral (new powers)</th>
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<th>The proposal</th>
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<td>Outline application for 8,600 sq.m. building for use as biomedical research laboratories, associated support/write up areas and plant space.</td>
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<th>The applicant</th>
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<td>The applicant is Imperial College, and the architect is Sheppard Robson.</td>
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<th>Strategic issues</th>
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<td>The proposed development is supported in principle and is acceptable in urban design terms. Further work is needed in relation to climate change mitigation and adaptation. Transport issues also need to be addressed, and an employment and training strategy should be secured.</td>
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<th>Recommendation</th>
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<td>That Hammersmith &amp; Fulham Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 44 of this report; but that the possible remedies set out in paragraph 46 of this report could address these deficiencies.</td>
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**Context**

1. On 15 December 2008 the Mayor of London received documents from Hammersmith & 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 23 January 2009 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 1C of the Schedule to the Order 2008: “Development which comprises or includes the erection of a building…more than 30 metres high and outside the City of London.”
Once Hammersmith & 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.

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

Site description

The application site is within the east quarter of the Hammersmith Hospital campus to the north of Du Cane Road. It is currently occupied by the 4-storey Accident & Emergency block, a red brick building of late Victorian construction. Adjoining the site to the north is the existing Block L, which has outline planning permission for redevelopment for a new biomedical research centre. To the north east is the recently completed Burlington Danes Imaging Centre, with the Burlington Danes School playing fields and Wormwood Scrubs open space beyond. To the east fronting Du Cane Road is a recently completed 5-storey key worker residential development. The remainder of the hospital campus is characterised by buildings of various architectural quality, age and height.

The area to the south of the site across Du Cane Road is predominantly residential, comprising 3-storey 1960’s flatted accommodation with more traditional semi-detached suburban development beyond.

The nearest London Underground stations are East Acton and White City, 900 metres west and south east of the site respectively. Both stations offer access to Central line services. The site is well served by buses, with five routes (7, 70, 72, 272, 283) accessible from Du Cane Road and route 95 accessible from a nearby stop on the A40 Westway. The site has a public transport accessibility level (PTAL) of 2 on a scale of 1 to 6, where 6 is classed as excellent. The nearest section of Transport for London Road Network (TLRN) is the A40 Western Avenue, approximately 200 metres to the south.

Details of the proposal

The application seeks outline planning permission for a 8,600 sq.m. (gross internal area) building for use as biomedical research laboratories, associated support/write up areas and plant space. The proposed building comprises two conjoined elements of five and six storeys, designed to integrate with the recently approved Block L to the north. The maximum height to plant roof level is approximately 30 metres above ground level, with floor-to-floor heights of 4.2 metres. Matters of landscaping and external appearance are reserved for future approval.

The building has been designed to integrate with the recently approved Block L redevelopment, with a glazed atrium through the centre of the building on a north-south axis, enabling connectivity through to Block L. The accident and emergency service will be relocated elsewhere within the hospital campus.

Case history

The application site forms part of the wider Hammersmith Hospital campus. A number of buildings on the campus have been redeveloped in recent years, the most recent being the new Burlington Danes Imaging Centre which lies immediately to the east of the application site. Block L, to the north of the site, has planning permission for redevelopment for a new biomedical research centre.
Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- World city role: London Plan
- Urban design: London Plan; PPS1
- Transport: London Plan; the Mayor’s Transport Strategy; PPG13; Land for Transport Functions SPG
- Parking: London Plan; the Mayor’s Transport Strategy; PPG13
- Health: London Plan; Health Issues in Planning BPG
- Climate change: London Plan; PPS1, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor’s Energy Strategy; Sustainable Design and Construction SPG

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 Hammersmith & Fulham Unitary Development Plan 2003 and the London Plan (Consolidated with Alterations since 2004).

Principle of proposed development

13 London Plan policy 3B.5 Supporting innovation, seeks to support the retention and development of London’s leading edge research capabilities, for example medical research, and encourage an adequate supply of environmentally attractive, high quality and affordable premises for business and research and academic institutions. This is supported by paragraph 3.164 which recognises that London has a concentration of the major medical research institutions in the UK and that together with other key research institutions they should be retained and their development needs supported. London Plan policy 3A.22, which seeks to promote the continued role of London as a national and international centre of medical excellence and specialised facilities, is also relevant.

14 The proposed development will provide high quality new research laboratories and associated facilities for Imperial College’s medical teaching and research functions. It represents the next stage in the planned improvement of the College’s existing facilities in the east quarter of the Hammersmith Hospital campus. The new facilities will contribute to maintaining the College’s pre-eminence in the fields of biomedical research and development. The proposal is consistent with the objectives of London Plan policies 3B.5 and 3A.22 and is supported in principle.

Urban design

15 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage and views.

16 The application is in outline form with external appearance and landscaping reserved for future approval. The material submitted demonstrates that there is a clear design rationale for the proposal, that the scale of the proposed building is compatible with the surrounding campus buildings and its form is appropriate in relation to the existing context. In particular, the architect has taken care to break down the mass of the building at the south east corner in response to the more domestic scale of development to the east and south. The building will provide continuity to the progressive stepping down of mass from the Commonwealth Building through the
consented Block L towards Du Cane Road, with the proposed building having a 3-storey appearance from Du Cane Road, being set back from third floor and above.

17 The main entrance is logically placed at the south east corner of the building facing Du Cane Road. It will benefit from and be given prominence by a canopied landscaped plaza, subject to detailed approval.

18 Whilst detailed design does not form part of the application, design concept elevations have been submitted and potential elevational treatment has been considered. The main principle of differentiating between the primary elements of the building is supported. At reserved matters stage the Council should ensure a high quality of materials and facade treatment which is visually interesting and makes a positive contribution to the area.

19 London Plan policy 4B.5 requires all future development to meet the highest standards of accessibility and inclusion. Information in relation to inclusive access arrangements is somewhat limited, although it is recognised that it is somewhat constrained at this stage by the outline nature of the proposals. At detailed design stage the Council should require the applicant to demonstrate how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development and how inclusion will be maintained and managed. Further guidance is provided in the Mayor’s Supplementary Planning Guidance ‘Accessible London: achieving an inclusive environment.’

Climate change

20 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to the mitigation of and adaptation to climate change and to minimise carbon dioxide emissions (Policy 4A.1).

Climate change mitigation

21 London Plan policies 4A.4-11 focus on mitigation of climate change and require a reduction in a development’s carbon dioxide emissions through the use of passive design, energy efficiency and renewable energy measures. The London Plan requires developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures and prioritising decentralised energy, including renewables.

22 The applicant has submitted a sustainability statement which includes a descriptive account of passive design measures, and low and zero carbon energy technologies considered for the development. Reference is made to an energy strategy report for the development but this document has not been made available to GLA officers. The following comments are therefore made on the basis of information included in the sustainability statement.

Baseline carbon dioxide emissions

23 The applicant has not provided an energy demand assessment, as required by London Plan policy 4A.4. A total carbon dioxide saving of 32.6% beyond minimum Building Regulations 2006 requirements is stated, but calculations have not been provided to substantiate this. The scheme should be modelled with building regulations approved software to establish the baseline carbon dioxide emissions. Non-Building Regulations controlled emissions should be added to this baseline. Total emissions should be expressed as emissions from heating, cooling and electricity demand.

Be lean
A series of energy demand reduction measures are proposed, but information is currently limited. Whilst the intention to reduce carbon dioxide emissions beyond building regulations requirements is welcomed, the level of detail provided is not sufficient to substantiate the claimed 21.8% reduction in carbon dioxide emissions from passive design and energy efficiency measures. These savings should be modelled with the building regulations approved software used for the baseline emissions to demonstrate how this figure has been reached. U values (W/m²K) and air tightness levels should be specified. Information should be provided in relation to the lighting needs of the development and how the standards to be adopted will exceed the baseline assumptions. A comparison of the building emissions rate (BER) with Building Regulations target emissions rate (TER) should be provided.

Be clean

The building is proposed to be connected to a site wide combined heat and power (CHP) network planned to replace the existing site wide steam heating system which serves the various hospital buildings. This is welcomed in line with London Plan policies 4A.5 and 4A.6. Further information is required in relation to:

- A simple schematic of the planned new network showing Block J connected into it.
- Information on the timing of the new network and CHP installation, and when Block J will be connected into it.
- The size of the CHP engine, how much of the thermal load of the new block it will provide and information on how the 10.9% CO2 saving from the CHP has been calculated.
- Details of the energy centre, its location on plan and information on whether it will house all heat generating plant required including CHP, back-up boilers etc.

The energy strategy lacks detail in relation to cooling, but the information provided indicates that the development will have an active cooling load and that mechanical ventilation systems may be required. Further information is needed in relation to these systems to understand their energy consumption and associated carbon emissions, and what proportion of the development’s cooling load will be provided by the proposed borehole water cooling system.

Be green

London Plan policy 4A.7 adopts a presumption that developments will achieve a reduction in carbon emissions of 20% from on site renewable energy generation, unless it can be demonstrated that such provision is not feasible.

The applicant proposes a borehole water cooling system, which is estimated to provide a 3.3% carbon dioxide saving. This falls substantially short of the 20% target set by London Plan policy 4A.7, and the applicant has not provided a full renewable energy options appraisal, so it is not possible to assess whether any other technologies may be suitable for the development. If the target cannot be achieved for technical reasons, a full explanation needs to be provided. Again, carbon savings from renewable energy technologies should be substantiated by detailed analysis. This information should be provided before the application is referred back to the Mayor at stage two.

Summary
Whilst the applicant appears to have applied the energy hierarchy set out in London Plan policy 4A.1, further work is required in relation to baseline emissions, energy efficiency measures, the proposed CHP system, cooling requirements and renewable energy before the application can be deemed compliant with London Plan energy policies.

**Climate change adaptation**

London Plan policy 4A.9 outlines five principles for ensuring effective adaptation to climate change in new developments. Further guidance is given in the Mayor’s Supplementary Planning Guidance ‘Sustainable Design and Construction,’ which sets out the Mayor’s essential and preferred standards for sustainable design and construction.

Climate change adaptation has not been addressed by the applicant. Whilst the desire to meet BREEAM ‘excellent’ is welcomed, the measures identified in London Plan policy 4A.9 need to be addressed. The applicant should commit to include measures such as living roofs, sustainable urban drainage systems and low water use systems.

**Transport**

TfL notes that the existing site access for vehicles from Du Cane Road will be retained. The increase of 190 staff is not likely to cause a major impact on any transport networks and no junction capacity assessment is required.

Six parking spaces will be provided, one of which will be for disabled use. The London Plan does not contain parking standards specifically for medical laboratories but reference to B1 standards in the transport assessment (TA) is accepted as a robust approach. Applying these standards would result in a maximum allowance of nine spaces, so the proposed six spaces are acceptable. The disabled parking space should be enforced as appropriate to prevent misuse.

TfL notes that 69 cycle parking spaces will be provided for this development. This level of provision is supported. Employee and visitor cycle parking should be accessible, safe and secure to encourage its use. Also, showering and changing facilities should be provided for staff. Adhering to these measures will comply with London Plan Policy 3C.22 Improving conditions for cycling.

TfL expects this development to offer local improvements for pedestrians such as footway resurfacing, the provision of better street lighting and the upgrade of crossings where they do not comply with BV165 standards. This would support London Plan Policy 3C.21 Improving conditions for walking.

Given that the site will generate additional demand for bus travel, TfL would also expect the applicant to carry out a condition survey of bus stops within 400 metres of the site. The level of contribution required to bring stops up to current TfL’s accessibility standards can then be identified. This would help the scheme comply with London Plan Policy 3C.20 Improving conditions for buses.

TfL welcomes the submission of a draft travel plan which is in accordance with London Plan Policy 3C.2 Matching development to transport capacity. Further detailed advice to the developer with regard to monitoring and implementation can be provided by TfL’s Smarter Travel Unit. The plan should be secured and monitored through the section 106 process.

In summary, TfL has no objection in principle to the proposed development, provided that employee and visitor cycle parking is provided in accordance with TfL standards.

**London Development Agency’s comments**
In accordance with the London Plan and the Economic Development Strategy, the London Development Agency (LDA) seeks to maintain and develop London as a top international destination and principal UK gateway for visitors, tourism and investment. Attracting students to London’s universities is integral to the growth of the capital’s economy and as such the LDA supports the principle of this proposal to redevelop and modernise a currently outdated building that is also in poor condition. The proposal is in general conformity with London Plan policy 3A.25 Higher and further education in that it will help to support and maintain London’s international reputation as a centre of excellence in higher education and it will take into account the future needs of the biomedical research sector.

In accordance with London Plan policies 3B.1 Developing London’s economy and 3B.11 Improving employment opportunities for Londoners, the LDA recommends the Council secures an employment and training strategy from the applicant to ensure that the economic benefits that arise from this proposal are maximised for local residents and businesses. During the construction phase of the development the applicant should consider initiatives that will allow for the recruitment of apprentices from local schools, as well as encouraging the recruitment of new employees from school leavers, older people and those that have been out of work for the long-term. Furthermore, the use of small and medium-sized enterprises (SMEs) should be encouraged during the construction phase of the development through appropriate advertising, e.g. sending out notification leaflets to all local SMEs prior to construction commencing. Should any job opportunities become available within the completed development (cleaners, security etc) then these jobs should be advertised locally to ensure that local residents within are given the opportunity to apply.

Local planning authority’s position

As yet unknown.

Legal considerations

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

There are no financial considerations at this stage.

Conclusion

London Plan policies on are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Urban design**: there is a clear design rationale for the proposed development, which complies with London Plan policy 4B.1.
• **Climate change**: insufficient information has been provided to assess compliance with London Plan climate change mitigation and adaptation policies. In its current form, the application cannot be deemed compliant with London Plan policies 4A.1, 4A.3 and 4A.4-11.

• **Transport**: a bus stop condition survey has not been undertaken. The application does not therefore comply with London Plan policy 3C.20.

• **Employment**: in the absence of a commitment to provide an employment and training strategy, the application does not comply with London Plan policy 3B.11.

45 On balance, the application does not comply with the London Plan.

46 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

• **Climate change**: modelling work for baseline carbon dioxide emissions and proposed savings should be provided. Further information as detailed above should be provided in relation to passive design and energy efficiency measures and integration with the proposed site wide CHP network. A full renewable energy feasibility assessment should be provided, and additional technologies considered. Commitments to include suitable climate change adaptation measure should be made.

• **Transport**: a bus stop condition survey should be undertaken and a section 106 contribution towards their upgrade may be required.

• **Employment**: an employment and training strategy should be secured by condition or via section 106 agreement.

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for further information, contact Planning Decisions Unit:

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