GREATER**LONDON**AUTHORITY

planning report D&P/3131/02

26 March 2014

BBC Television Centre, White City

in the London Borough of Hammersmith & Fulham

planning application no. 2013/02355/COM

Strategic planning application stage II 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

Hybrid planning application for redevelopment of site comprising retention, remodelling, refurbishment and demolition to provide approximately 185,000 sq.m. of floor space, with up to 1,025 residential units, offices, leisure uses, and retention of BBC Studios and Post Production space (Listed Building and Conservation Area Consent also being sought)

The applicant

The applicant is **Stanhope** and the architect is **AHMM.**

Strategic issues

The principle of **mixed-use regeneration**, with housing, media, business, hotel and leisure uses is in accordance with strategic objectives for the **White City Opportunity Area** and is strongly supported.

The **masterplan** scheme is generally well designed and complies with London Plan urban design policies, including in respect of the proposed tall building. Outstanding issues and clarification has been provided in relation to **residential quality, affordable housing** delivery, the **mix of units**, **energy**, and **transport. Section 106 contributions** have been secured in accordance with the White City development infrastructure funding study.

The Council's decision

In this instance Hammersmith & Fulham Council has resolved to grant permission.

Recommendation

That Hammersmith & Fulham Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1 On 5 July 2013 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. This was referred to the Mayor under the following categories of the Schedule to the Order 2008:

1A - Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats;

1B Development which comprises or includes the erection of a building in Central London (other than the City of London) and with a total floorspace of more than 20,000 square metres;

1C - Development which comprises the erection of a building that is more than 30 metres high and is outside the City of London; and

3F -Development for a use other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use.

2 On 14 August 2013 the Mayor considered planning report D&P 3131/01, and subsequently advised Hammersmith & Fulham Council that the application broadly complied with the London Plan, for the reasons set out in paragraph 82 of the above-mentioned report, but asked that consideration be given to the possible remedies set out in the same paragraph to address outstanding deficiencies.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised in response to the Mayor's concerns (see below). On 19 December 2013 Hammersmith & Fulham Council decided that it was minded to grant planning permission for the revised application, and on 14 March 2014 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Hammersmith & Fulham Council under Article 6 to refuse the application or issue a direction to Hammersmith & Fulham Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application and any connected application. The Mayor has until 27 March 2014 to notify the Council of his decision and to issue any direction.

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 decision on this case, and the reasons will be made available on the GLA's website www.london.gov.uk.

Update

6 At the consultation stage Hammersmith and Fulham Council was advised that the application broadly complied with the London Plan in relation to the principle of the use, design and heritage aspects of the scheme. Further information was required in relation to the affordable housing offer, residential quality, play space, density, inclusive design, energy, and on aspects of the transport strategy. Taking each point in turn, the following is noted:

<u>Housing – affordable housing</u>

7 At consultation stage, the Council was advised that the applicant would need to confirm the precise level of affordable housing proposed, and that any quantum of affordable housing should take into account the recommendations of the of the Development Infrastructure Funding (DIF) Study, which confirms that it would generally be viable to provide 15% affordable housing

as well as the suggested DIF tariff payment. The Council was advised that GLA officers should be provided with the detailed viability assessment submitted by the applicant, in order to be satisfied that the scheme is maximising affordable housing delivery and meeting local needs, in accordance with London Plan policy 3.12 and the White City OAPF.

8 The Council was also advised that further information was required to confirm whether the scheme was securing the best outcome affordable housing in terms of tenure, numbers and range of units, including in the 'affordable rent' category, to ensure that the blend of affordable housing in the scheme reflects local housing needs and strategic objectives. Confirmation was required from the Council's housing team that the affordable housing types and tenure split reflect local housing needs.

9 The applicant submitted a viability appraisal which suggested that 10% affordable housing would be the maximum achievable on the site. Following the Council's independent review of the applicant's appraisal, the applicant increased the offer to 12% affordable housing (121 units) as a baseline, with potential to increase to a maximum of 17% (176 units) on the basis of two scheme reviews at key milestones. All the affordable units would be provided in the third phase of development, on development plots E, G and H. The Council accepted such a deferral of affordable housing delivery to later phases of the scheme in order to reduce the risk and cost of development on the initial phases, which include substantial costs of refurbishment of the listed building and delays caused by the ongoing occupation of the building by the BBC. This deferral has a positive impact on the overall scheme viability, allowing for the higher overall amount of affordable housing to be delivered along with a section 106 contribution of £10m.

10 In terms of tenure mix, the London Plan and Revised Early Minor Alterations set an expectation that there be a 60:40 split between social/affordable rent and intermediate housing. The White City OAPF suggests that two-thirds comprises social/ affordable rent and one-third intermediate housing, with the Council's Core Strategy policy specifying that 25% of all development in the OA to include social rented accommodation specifically to re-house residents of the White City Estate in the event of estate redevelopment.

11 The tenure of the units forming part of the negotiated 12% affordable as proposed would be 111 'discount market sale' (DMS or intermediate) units, and 10 affordable rent units (for people with special needs), all located in plot H. This baseline proposal represents an 8:92 split, which demonstrates a heavy weighting towards intermediate housing.

12 Although initial proposals from the applicant incorporated a higher proportion of social/affordable rent (35:65), the Council accepted the reduction in social/affordable rent levels in negotiating a higher overall amount of affordable housing. The Council has justified the low amount of social/affordable rented in this case on the basis that there are no current proposals to redevelop the estate, and it would be inappropriate to burden the viability of the current proposal with social rented units at this time.

13 The section 106 agreement does provide for a review of the tenure of both the 'baseline' and additional affordable units by a 'tenure determination method' set out in the legal agreement. The tenure review mechanism proposed in the s106 allows for future reconsideration of the tenure mix for both the 'baseline' units and any additional units procured through the review process. If the scheme was to be revised to incorporate affordable/social rented units, affordable/social rented units could only be provided on plot H, with any other additional affordable housing provided on plots E and G to be DMS.

14 The section 106 agreement also establishes that a set proportion of DMS units shall be made affordable for households at each of three levels of household income that are within the income ranges in the London Plan Annual Monitoring Report (AMR), representing a 'lower,' 'intermediate' and 'upper' income thresholds of £30,000, £40,000, and the upper limit of the GLA capped income. The levels and percentage of discount allow the proposals to constitute a

genuine form of 'affordable' intermediate offer that is affordable within the income ranges as updated in the London Plan AMR, and allows for a greater range of affordable housing to be offered.

15 Given the extraordinary development costs currently identified by the applicant, it has been demonstrated that the current offer is the maximum reasonable amount of affordable housing that could be delivered.

Housing Mix

16 As noted at stage 1, the Design and Access Statement illustrates a minimum scheme of 992 units across the entire site, and the ES considers a maximum scheme of 1,025 units. The applicant had set out an indicative mix for the scheme, which comprises 5% studio units, 33% 1-bed units, 42% 2-bed units, and 20% 3+ bed units/houses. Confirmation was sought that this mix meets local needs.

17 Following our consultation response, the applicant has confirmed the mix and quantum for the plots for which they are seeking detailed permission; that these will not include any affordable housing, and will achieve a higher proportion of smaller units than set out in the indicative mix:

Studio	**1-bed**	**2-bed**	**3-bed**	**Total**
28 (6%)	161(35%)	212 (46%)	56 (12%)	457

18 The viability assessment (which informed the final affordable housing offer) considered a total of 1,022 units, and taking into account the above quantum set out for the detailed application, put forward the following mix for the remainder of the site:

Tenure	**Studio**	**1-bed**	**2-bed**	**3-bed**	**4-bed**	**5-bed**	**Total**
Private	33	104	180	106	2	18	443
Social Rented		2	8				10
DMS		55	46	11 (10%)			112
Total	33 (6%)	161 (28%)	234 (41%)	117 (21%)	2 (.3%)	18 (3%)	565

19 Although the Housing Strategy sets out that 36% of affordable housing that is allocated funding in the 2011-15 round would be expected to have three or more bedrooms, none of the proposed social rented units would be large units; this is in the context of the units are intended being for a specific need that has been identified by the Council, and is therefore acceptable. This proposal also puts forward 10% of its intermediate housing as having three or more bedrooms, and 24% of the total 565 units to be delivered in the outline phases would be 3 bedrooms or larger, and this is welcomed.

20 The Council has considered the mix proposed in the detailed part of the application as compliant with local policy and responding to local need; likewise the indicative mix put forward with the outline components of the proposal is in accordance with local policy, and the flexibility within those plots to vary the mix provides the opportunity to adjust the proposals to respond to local need as identified at the time of the consideration of the reserved matters applications. In the context of the conditions and section 106 clauses relating to reviewing affordable housing tenure and mix, the circumstances of the tenure mix, and the special nature of the proposed social rented housing, the approach to housing is accepted, and outstanding issues with regards to housing have been resolved.

Residential Quality and Density

21 At consultation stage the applicant was asked to elaborate on how the scheme responds to the criteria which help ensure an acceptable standard of accommodation for future residents, as set out in the Mayor's London Housing Design Guide. The applicant was also asked to confirm the site density.

22 The applicant has calculated the net site residential density to be 232 units/hectare, or 664 hr/hectare. As noted at stage 1, the site has a public transport accessibility level (PTAL) of 6a, and is classified as central in character whereby a density range of between 650-1,100 habitable rooms per hectare is suggested in the London Plan. The proposal is therefore of an appropriate density for its location. This is reinforced by its high quality design and access to public realm and open space.

23 For plots that have been submitted in outline, the applicant has noted that the architects have endeavoured to provide a broad mix of dual aspect units, with the illustrative masterplan eliminating any single aspect, north facing units, and 68% of all units being dual aspect.

24 Within plots B and C (the plots within and adjacent to the listed building), a small number (22) of north facing single aspect units are proposed, but the proposals have been constrained by the requirement to respect the form, orientation and setting of the listed building. 28% of units are illustrated as dual aspect.

25 The Council has proposed conditions on the plots which have been submitted in outline requiring all residential units to comply with minimum space standards and submission for approval details of the design to ensuring appropriate mitigation to limit the noise levels within the residential units from external noise sources. Provision of private amenity space will be controlled by approval of parameters plans which illustrate where balconies will be provided and shared private landscaped areas. Outstanding issues relating to residential quality have been addressed.

Children's play space

26 At consultation stage, the applicant was asked to confirm the child yield as the submission documents were inconsistent. Bearing in mind that the detailed mix and tenure in the latter phases may change, resulting in a potentially different child yield, the applicant has submitted a revised calculation that indicates that up to 215 children are predicted to live in the development, of which 98 would be under the age of 5, requiring a total of 980 sq.m. of doorstep playable space.

27 The applicant has also submitted revised play strategy that highlights the areas where doorstep playable space could be delivered for each development plot, which confirms that the minimum provision for under 5s can be accommodated on site and would meet the minimum space requirements. All outstanding matters relating to children's play space have been satisfactorily addressed.

Inclusive design

28 At consultation stage, issues around the design of the shared surface and taxi rank, ramp systems for the site and routes to the World Service Building entrance and down to the railway arches, step-free routes and shared spaces were raised.

29 The applicant has consulted further with the local access group and submitted revisions to the proposals that resolve many of the issues noted above, or set out how detailed design at reserved matters stages will be able to resolve any outstanding details. Revisions include the incorporation of accessible drop-off points, with flush road and pavement surfaces, within 50 metres of dwelling, workplace, hotel and retail entrances, defined raised kerbed pavement edges in routes where there is frequent traffic and heavier goods vehicles, specific raised 'taxi upstand pad' areas for wheelchair users where there are kerb-free areas, and a series of 1:21 slopes to

the approaches of Building A and B/C for all to use. All outstanding matters relating to inclusive design have been resolved.

Climate Change

30 At consultation stage, further information was sought in terms of modelled evidence of proposed carbon savings, details of connection opportunities to future district heating networks, confirmation that all residential and non-domestic uses would be connected to the proposed site heat network and illustration of the network route, as well as confirmation that the site heat network would be supplied from a single energy centre.

31 Modelling results have been submitted to confirm the savings claimed in the submitted energy strategy. The applicant has provided a plan and phasing schedule that confirms that all building types will be connected to the site heat network. The applicant has also confirmed the route of the network, the size of the proposed CHP engines, and illustrated how the site heat network will be supplied from a single energy centre in plot A; this will be secured by condition. Details on the amount of PV proposed have been provided as well.

32 At consultation stage the applicant was asked to demonstrate efforts to enable connections to the future local district heating network. Evidence of correspondence with the developers of the White City district heating network (DEPDU) has been submitted, including consideration of delivery and connection opportunities for the application site. The DEPDU proposals rely on the incorporation of an area-wide energy centre on the Westfield site across the road. Although Westfield has not incorporated an energy centre which would be large enough to achieve this in their current proposal, the applicant has confirmed their ongoing engagement with DEPDU, Westfield and LBHF to progress plans to deliver a network.

33 The further information submitted addresses the outstanding concerns relating to climate change, and all matters relating to this area have therefore been resolved.

Transport for London's comments

Car, cycle and coach parking

34 Given the hybrid nature of the application, appropriate planning conditions have been placed on the consent in order to control the number and location of both car and cycle parking spaces. This is in line with the recommendations set out in the White City Opportunity Area Planning Framework (OAPF) and consents on neighbouring sites. Further work has also been undertaken to justify parking provision for the remaining BBC uses on site, and this provision is now accepted. It is also accepted that any coaches arriving at the site will have provision for pick up and set down within the main forecourt area. These conditions also include requirements for provision of blue badge parking and electric vehicle charging points in line with London Plan standards. In addition, planning obligations have been used to require submission of a car park management plan and provision of three car club spaces. This is all welcomed by TfL.

Trip generation

35 Although the issues raised by TfL at Stage 1 regarding trip generation have not been fully resolved, these issues relate primarily to the previous trip generation of the TV Centre under full occupation rather than of the future development. It is accepted that trip numbers are in line with those assumed through Scenario B of the OAPF Strategic Transport Study.

Mitigation and Development Infrastructure Funding Study (DIFS)

36 The impact of the development will largely be mitigated through the White City DIFS tariff as follows; £2.2m for highways improvements in and around the White City Opportunity

Area (OA), £200,000 towards a new cycle hire docking station in an agreed location on Wood Lane, and £450,000 towards additional bus capacity in the OA. These contributions are seen as appropriate by TfL and are welcomed.

37 In addition, there is a contribution of approximately £3m which will be placed into a general infrastructure funding pot which may be available for further transport mitigation. In line with recent discussions between the council, TfL and other developers in the area, the council and TfL must now revisit the transport study and transport interventions to update the assumptions including validation of the area wide VISSIM model. TfL would welcome further discussion with the council on how this funding could be used towards transport improvements including road space management, signal strategies, greater protection of bus network and where deliverable junction improvements.

London Underground infrastructure

38 TfL had previously identified that plots E, F, G and H are in close proximity to the Hammersmith and City line viaduct, and therefore appropriate controls would need to be placed on any permission to ensure that these will not result in an unacceptable impact on London Underground infrastructure. A planning condition has been applied in line with TfL advice and London Plan Policy 6.2 Providing Public Transport Capacity and Safeguarding Land for Transport.

Pedestrian and cycle routes

39 The provision of new pedestrian and cycle links through the site which increase access to Hammersmith Park and Wood Lane station is welcomed by TfL. Although it is understood that for security reasons these routes may sometimes need to be closed, the closures will be controlled by an Operations Management Plan which has been secured by condition. The development proposals also allow for the potential provision of a north-south pedestrian and cycle route between Plot G and the Hammersmith and City line viaduct, which would allow the creation of a link between the site and Shepherds Bush Market. Although funding cannot be committed for this until further feasibility work is undertaken, the section 106 agreement contains a requirement for the applicant to use reasonable endeavours to work with TfL to deliver this route. This is welcomed and is in accordance with London Plan Policy 6.9 Cycling.

40 TfL is currently working up options for an east-west cycle route, a major infrastructure project which is set to carry significant cycle trips in the future. The western end of the route is set to start in the vicinity of Savoy Circus/ Westway close to the development site. There may in the future be an opportunity to integrate this into the development site.

Other issues

41 A requirement for a standalone Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP) has been secured by condition. In addition, planning obligations have been used to secure submission and ongoing monitoring of a Travel Plan, which is welcomed.

42 In summary, the issues raised by TfL at Stage 1 have now been addressed and the application is considered compliant with the transport policies of the London Plan. The mitigation secured through the section 106 agreement and DIFS is welcomed, although TfL through the White City Implementation Group would welcome the opportunity to work with the council and developers in order to identify what additional funding for transport from the general infrastructure funding pot will be required.

Response to consultation

43 The application was advertised by site and press notices, and with two rounds of letters of consultation sent to 2,097 neighbouring properties. A total of 33 responses were received; 10 responses were received for the first round of consultation, of which 3 were objections and one was a petition signed by 37 names. 23 responses to the second consultation included duplicates as well as additional objections. Concerns raised by objectors related to the following:

- *Land use principles*: Unacceptable housing density

- *Transport:* level of additional cars, increased pressure on on-street car parking, adverse effect on road traffic safety, increased congestion to surrounding streets

- *Amenity:* daylight and sunlight implications due to height of buildings; adverse impacts on residential amenity and the park in terms of overshadowing, overlooking and loss of privacy; light and noise pollution to neighbours

- *Design:* impact on the character and appearance of the area and the conservation area; unacceptable impact on the skyline, excessive height of the tower, over-bearing development; impact on the listed building; visual impact will negatively affect property value; undesirable precedent set by allowing a tall building

- *Local infrastructure:* impact and increased pressure on facilities in Hammersmith Park, lack of green park spaces, no provision for local schools

44 In relation to the objections raised, matters relating to impact upon residential amenity are not in this instance strategic planning matters and have been assessed by the Council in the committee report, with appropriately worded conditions and planning obligations secured. In relation to the objections raised in relation to land use principles, design, local infrastructure and transport, these matters have been dealt with in this and the previous report, with the scheme found to be acceptable and in accordance with the London Plan.

45 With regards to statutory consultees, English Heritage, London Fire Brigade, Natural England and the Health and Safety Executive raised no objections. Other statutory consultees responded as follows:

- **English Heritage (Archaelogy):** Requests further archaeological investigations, which the Council has secured by way of condition.

- **London and Middlesex Archaeological Service (LAMAS):** no objections, although some concern over the height of the tower.

- **Environment Agency (EA):** No objections, subject to conditions requiring to foul and surface water drainage schemes and restrictions as set out in the Flood Risk Assessment.

- **Inner North West London NHS:** Request section 106 financial contribution for healthcare services to meet the needs of the new population. Confirm that capital contributions are required as part of pooled s106 contributions in White City.

- **Twentieth Century Society (TCS):** support principle for redeveloping the site and endorse the approach taken to retaining the listed parts of the building subject to detailed design, which has been amended to address TCS concerns.

- **Hammersmith Society (HS):** supports the principle of development. Strong concerns raised with regards to the height, design and massing of the 25 storey tower which is thought would harm the setting of the listed building, Hammersmith Park and Wood Lane Conservation Area. Concerns are also raised with regards to the shortfall of amenity play space for children.

- **Hammersmith and Fulham Historic Buildings Group (HFHBG)**: Support overall development principles. Strong objection to the design and height of the tower which should be no higher than the existing East Tower.

- **LBHF Disability Forum**: No objections, subject to conditions on detailed design of shared surfaces, the ring road, level thresholds to the buildings, platform lifts, lifetime homes, wheelchair accessible housing and car parking.

- **Frithville Gardens Residents Group (FGRG)**: supported the principle for redevelopment of the site, but concerns with regards to Plots E (Drama Block) and Plots F (Townhouses), the access gates to the site at the end of Frithville Gardens, on-site car parking and the construction processes.

- **Thames Water:** Concerned about surface water and combined sewer drainage flooding/overflows and supportive of use of SUDS to alleviate impacts; seeks collaboration between GLA, EA and Thames Water to identify solutions to the above issue. Requests condition requiring submission of a piling method statement.

46 The Royal Borough of Kensington and Chelsea, MacFarlane Road Residents Association, and White City Neighbourhood Forum did not respond to the consultation.

Article 7: Direction that the Mayor is to be the local planning authority

47 Under Article 7 of the Order the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at stage I, therefore there is no sound planning reason for the Mayor to take over this application.

Legal considerations

48 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

49 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 03/2009 (*'Costs Awards in Appeals and Other Planning Proceedings')* emphasises that parties usually pay their own expenses arising from an appeal.

50 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the

Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

51 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

52 The principle of redevelopment of this site and the proposed mix of uses are consistent with the aspirations for the White City Opportunity Area and London Plan policies. Outstanding issues relating to residential quality, affordable housing delivery, the mix of units, inclusive access, climate change mitigation and transport have been satisfactorily resolved, and the Council and applicant have agreed appropriate planning conditions and s106 contributions, including White City OAPF-related infrastructure works.

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GREATER**LONDON**AUTHORITY

planning report D&P/3131/01

14 August 2013

BBC Television Centre, White City

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Strategic planning application stage 1 referral

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The proposal

Hybrid planning application for redevelopment of site comprising retention, remodelling, refurbishment and demolition to provide approximately 185,000 sq.m. of floor space, with up to 1,025 residential units, offices, leisure uses, and retention of BBC Studios and Post Production space (Listed Building and Conservation Area Consent also being sought)

The applicant

The applicant is **Stanhope** and the architect is **AHMM.**

Strategic issues

The principle of **mixed-use regeneration**, with housing, media, business, hotel and leisure uses is in accordance with strategic objectives for the **White City Opportunity Area** and is strongly supported.

The **masterplan** scheme is generally well designed and complies with London Plan urban design policies, including in respect of the proposed tall building. There are, however, outstanding issues and clarification required in relation to some aspects, including **residential quality, affordable housing** delivery, the **mix of units**, **energy**, and **transport**, together with s106 contributions in accordance with the White City development infrastructure funding study.

Recommendation

That Hammersmith & Fulham Council be advised that the application is broadly acceptable but does not fully comply with the London Plan at this stage, with the reasons and remedies set out in paragraph 82 of this report.

Context

1 On 5 July 2013 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 16 August 2013 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 the following categories of the Schedule to the Order 2008:

1A - Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats"; –

*1B Development which comprises or includes the erection of a building in Central London (other than the City of London) and with a total floorspace of more than 20,000 square metres; an*d

1C - Development which comprises the erection of a building that is more than 30 metres high and is outside the City of London;

3F "Development for a use other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use"

3 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.

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 The application relates to the BBC TV Centre presently containing studios, stages and offices used for television production. The site contains a number of existing buildings, including the prominent Question Mark ("Doughnut") Buildings, restaurant block, drama block and land to the south, a 15 storey office block (East Tower), and a multi-storey car park. The total site area is 5.7 hectares.

7 The site is bounded to the east by Wood Lane, to the west by Hammersmith Park, South Africa Road to the north and Macfarlane Road to the south. A railway viaduct for London Underground lines dissecting the site in a north east to south west direction. The surrounding area comprises a mix of land uses, including Westfield Shopping Centre, other development sites such as Imperial West and the Former Unigate Dairy site, as well as residential streets with terraced housing.

8 The site is within the White City Opportunity Area (WCOA), and with the exception of the car park, the site is within the Wood Lane Conservation Area. The BBC TVC is also Grade II listed building, with the central 'inner ring' and Studio 1 forming the special interest.

9 The nearest parts of the Transport for London Road Network (TLRN) is the A40 Westway, 500 metres to the north and the A3220 West Cross Route, accessed via the Holland Park Roundabout (850 metres to the south-east). The A4020 Uxbridge Road, 500 metres to the south, forms part of the Strategic Road Network (SRN).

10 The site is served by a number of high frequency bus routes which are within a short walking distance on Wood Lane and at White City bus station. The site is also within 50 metres of Wood Lane station and 150 metres of White City station, providing access to Hammersmith and City and Central line services. Shepherd's Bush rail station, which is served by London Overground and Southern services, is approximately 900 metres to the south east of the site. The site therefore has an excellent public transport accessibility level (PTAL) rating of 6a to 6b across the site (on a scale of 1 to 6b, where 6b is the most accessible).

Details of the proposal

11 The applicant is seeking planning permission for the comprehensive redevelopment of the site, including renovation and adaptation of some buildings. The site has been divided into eight plots, with detailed permission sought for some elements and outline planning permission for others (noted in brackets):

- Plot A - Stages 4 and 5: facade retention and two storey rooftop extension to provide retail, studio and office space (detailed);
- Plot B - Inner Ring, Helios: retention and refurbishment to provide 193 residential units, boutique hotel, retail and 'media experience' leisure space (detailed);
- Plot C- Outer Crescent: demolition with new buildings up to 9 storeys to contain 254 residential units (detailed with approval of landscaping reserved for a later date);
- Plot D - Restaurant Block: Demolition and replacement with building up to 8 storeys to contain approximately 71 residential units (outline approval for up to 8,000 sq.m. with all matters reserved);
- Plot E - Drama Block: demolition and replacement with building up to 8 storeys to contain approximately 167 units (all matters reserved)
- Plot F - Land to the rear of the Drama Block to be cleared and replaced with up to 20 townhouses (all matters reserved);
- Plot G - East Tower: demolition of existing 15 storey (detailed) building and replacement with a 25 storey tower to contain 167 residential units, with flexible ground floor commercial uses (detailed with details of internal layouts reserved);
- Plot H - MSCP: demolition and construction of building up to 9 storeys to contain approximately 120 residential units and 1,000 sq.m. of flexible retail/leisure space at ground level (all matters reserved).

12 Associated parking, landscaping, public realm, utility infrastructure works and alterations to vehicular and pedestrian routes are proposed as part of the masterplan proposals.

13 In total, up to 186,000 sq.m. (GEA) of floor space would be provided, with up to 1,025 residential units (120,744 sq.m), approximately 33,000 sq.m. of office floor space, a 47-bed hotel, 9,500 sq.m. Class A1-A4 retail space, 12,000 sq.m. of Class D1/D2 leisure space, and 2,500 sq.m. flexible commercial/leisure space.

14 Listed building consent is required for works on Plot A, B, C, D, E and G, together with conservation area consent.

Case history

15 The applicant has engaged in pre-application discussions in the lead up to the application submission, having acquired the site in July 2012. GLA officers have confirmed support in principle for a mixed use redevelopment, including a tall building, subject to resolution of strategic issues relating to affordable housing, detailed design, access, the approach to the energy strategy, transport and DIF matters (ref D&P/3131).

Strategic planning issues and relevant policies and guidance

16 The relevant issues and corresponding policies are as follows:

- Principle of development *London Plan*
- Housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Affordable housing *London Plan; PPS3; Housing SPG, Housing Strategy; draft Revised Housing Strategy;*
- Density *London Plan; PPS3; Housing SPG;*
- Tall buildings/views *London Plan, Revised View Management Framework SPG;*
- Urban design *London Plan;*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Sustainable development *London Plan; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy; Sustainable Design and Construction SPG*
- Transport/parking/CIL *London Plan; the Mayor's Transport Strategy*

17 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, 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 (2010) and the London Plan (2011).

18 The following are also a relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework
- The Revised Early Minor Alteration to the London Plan
- Hammersmith and Fulham Development Management DPD (Submission version) (July 2012)
- White City OAPF (Second Public Consultation June 2013)

Principle of Development

Mix of uses

19 The site is within the White City Opportunity Area (WCOA) as designated in policy 2.13 and Map 2.4 and of the London Plan. Annex 1 of the London Plan identifies an indicative capacity of 10,000 new jobs and a minimum of 5,000 new homes in the opportunity area over the plan period to 2031, and provides the strategic policy direction which includes de-designation of the historic strategic industrial location (SIL), potential for mixed density housing

and a focal point for office development, housing-led intensification which supports local regeneration, improvements to connectivity with the wider area and scope to enhance education and research capabilities in the area.

20 The GLA and Hammersmith & Fulham Council are jointly producing an Opportunity Area planning framework (OAPF) and the most recently produced draft sees reuse of Television Centre for media, leisure, entertainment, creative use and the provision of offices for the BBC's production partners. The site falls within the 'White City East' area where a significant number of large development sites and mixed-use regeneration are highlighted, and where housing, media, business, hotel and leisure uses are expected.

21 The scheme sees the retention of BBC uses on the site, which will enable the legacy of the BBC to remain in the area. Whilst there would be a loss of traditional Use Class B1 office floor space to residential and other uses, scheme would generate up to 2,330 jobs on site once completed, equating to nearly a quarter of the target set in the London Plan for new jobs in the WCOA. Therefore, the loss of employment floorspace (Use Class B) on this local site does not cause concern at the strategic level.

22 A range of retail and leisure uses are proposed and the applicant has submitted a retail assessment, confirming that the quantum of Class A floor space is in proportion with and complimentary to the overall development, and would have a minimal impact upon the Shepherds Bush Town Centre. The site is a suitable location for a hotel, within the WCOA and in close proximity to the town centre. The general mix of uses proposed in this scheme is in accordance with strategic objectives of the London Plan and the WCOA and are strongly supported.

Social infrastructure and DIF

23 With the increased population to be generated by the collective developments in the WCOA, the draft OAPF sets out a number of essential infrastructure requirements including education provision, employment and training, healthcare, open space, transport and electricity supply. There is a tariff based charge in place, which this development would be expected to make, secured in the s106 agreement.

Housing

24 The scheme proposes a mixed use development containing up to 1,025 homes in a series of converted buildings, new flatted low rise blocks, a tower and terraced housing. The scheme represents 20% of the expected new homes for the WCOA and is welcomed in principle.

25 The applicant has provided two potential scenarios in terms of the mix and tenure for the purposes of the Environmental Impact Assessment, as follows but these are not for determination:

Tenure	**Studio**	**1-bed**	**2-bed**	**3-bed**	**4-bed**	**5-bed**	**Total**
Private	56	277	375	157	2	18	885
Social Rented	0	14	30	27	0	0	71
DMS	0	21	23	10	0	0	54
Total	56	312	428	194	2	18	1,010

Tenure	Studio	1-bed	2-bed	3-bed	4-bed	5-bed	Total
Private	56	277	375	157	2	18	885
Social Rented	0	14	30	27	0	0	71
DMS	0	47	22	0	0	0	69
Total	56	338	427	184	2	18	1,025

Affordable Housing

26 At this stage, the applicant has not confirmed the precise level of affordable housing that it would be providing but has confirmed that this would be subject of a detailed viability assessment, to be independently reviewed on behalf of the Council. This will need to take account of the recommendations of the Development Infrastructure Funding (DIF) Study, which confirms that it would generally be viable to provide 15% affordable housing as well as the suggested DIF tariff payment. Further discussion would be expected before the application is reported back at Stage 2 in relation to the toolkit appraisal and details shared with GLA officers, in order to be satisfied that the scheme is maximising affordable housing delivery and meeting local needs and in accordance with London Plan policy 3.12 and the White City OAPF.

27 In terms of tenure, at present the assumptions in the Environmental Statement are that any affordable housing comprises social rent and discounted market sale (DMS). In line with the NPPF, the revised early alterations to the London Plan introduces 'affordable rent' as an additional affordable housing product along with social rent and intermediate housing. The Mayor's Housing SPG notes that at least for the duration of the 2011-15 investment round, the Government anticipates that funding of social rent provision will only be supported in limited circumstances. Therefore housing providers, supported by the relevant local authorities, will have to make a strong case to demonstrate why affordable rent would not be a viable alternative to social rented units within schemes. This does not preclude support for provision of social rent through applicants or Boroughs own resources/funds but before doing so the applicant will need to consider whether the scheme will indeed be securing the best outcome affordable housing in terms of numbers and range of units in line with the requirement to maximise output as required by London Plan Policy 3.11, 3.12 and paragraphs 4.3.2 – 4.3.28 of the Mayor's Housing SPG.

28 The applicant is also currently suggesting that the intermediate provision would all be 'discount market sale' units (DMS), which is a lower than market price cost shared equity product, where the new build home is purchased at a discounted price, without the need for public subsidy. The level and percentage of discount will be important and need to be sufficiently large to constitute a genuine form of 'affordable' intermediate offer that is affordable within the income ranges as updated in the London Plan Annual Monitoring Report (AMR).

29 In accordance with the London Plan and Revised Early Minor Alterations, there is an expectation that there be a 60:40 split between social/affordable rent and intermediate housing. The White City OAPF suggests that two-thirds comprises social/ affordable rent and one-third intermediate housing. Further discussion would be expected regarding the blend of affordable housing, to ensure that the scheme reflects local housing needs and strategic objectives. The applicant would be expected to sensitivity test the proposed and alternative scenarios so as to ensure that the maximum reasonable amount of affordable housing is secured. It may be that in providing a greater range of affordable units, including some at rents above target rent, further units could be delivered. This aspect should be analysed as part of the toolkit appraisal, and shared with GLA officers before the application is referred back at Stage 2. Confirmation from

the Council's housing team, that the affordable housing types and tenure split reflect local housing needs, should be confirmed. The provision would need to be secured in the s106 agreement.

30 Officers would also note that provisions will need to be put in place for re-appraising the viability of the scheme prior to implementation given the outline nature of the application, length of time that may pass from initial toolkit appraisal to actual build out and because this scheme could be built in phases and there are likely to be abnormal costs. Further discussion on this aspect would be welcomed and appropriate mechanisms would need to be secured in any s106 agreement. The draft s106 planning obligations together with the Council's independent assessment should be shared with GLA officers prior to the Stage 2 referral in order to be clear that the approved scheme reflects London Plan policy and the Housing SPG.

Housing mix

31 The applicant has set out an indicative mix for the scheme, which comprises 5% studio units, 33% 1-bed units, 42% 2-bed units, and 20% 3+ bed units/houses. In the absence of confirmation regarding the final affordable housing, the applicant should note the Housing Strategy, which sets out that 36% of affordable housing that is allocated funding in the 2011-15 round would be expected to have three or more bedrooms. Further discussion is expected once this has been finalised, including confirmation that such a mix would meet local housing needs, with the agreed mix secured as part of any planning permission.

Residential quality

32 The applicant has provided a range of flat typologies for the different plots for which detailed permission is sought, and has committed to meeting the minimum unit size standards and dwelling space standards within the Housing SPG and London Housing Design Guide. This is welcomed and should be secured as part of any planning permission, together with securing these commitments for the outline elements.

33 The Mayor's guidance sets out a number of other criteria which help ensure an acceptable standard of accommodation for future residents. In this respect, the applicant should provide a narrative of efforts made to provide dual aspect units, and no solely north facing single aspect units – for both the detailed and outline aspects as this is presently lacking. In light of the fact that the internal layout of some buildings, particular the tower, is also reserved for determination, further details regarding commitments to meeting LHDG, in terms of space standards, private amenity space, dual aspect and elimination of solely north facing units should be provided.

34 Also noting that there are several areas on the site where noise levels and air quality may be affected by rail, road traffic and the uses within the development itself (such as the studios), it is expected that the facade design of the affected units will need to incorporate specialised mitigation features. Specific conditions would be expected to secure these details.

Children's play space

35 Based on the Mayor's SPG, and using the indicative housing mix indicated, the applicant has indicated in its Environmental Statement that up to 212 children are predicted to live in the development of which 104 would be under the age of 5. The Design and Access statement

indicates a higher provision when broken down plot by plot. As such, clarification of the overall child yield is required, with this being likely to alter depending on the overall affordable housing offer.

36 The landscaping plans to date show communal amenity spaces across the site and between the blocks and where there are "opportunities" for play. Confirmation that the minimum provision for under 5s can be accommodated on site is still required, with clarification that the areas shown in the plans would meet the minimum space requirements. This is particularly given the high density and mixed use nature of the development. As part of any planning permission, the minimum provision of dedicated on-site play space for under 5 year olds, as well as the detailed design of the various play areas will be determined at reserved matters stage. Provision for older children would also be expected to be accommodated in the surrounding area, and secured as part of the DIF tariff.

Density

37 The site has a public transport accessibility level (PTAL) of 6a, and is classified as central in character whereby a density range of between 650-1,100 habitable rooms per hectare is suggested in the London Plan. In accordance with the guidance set out in paragraph 3.35 of the Housing SPG, given the mixed use nature of the scheme, the applicant should provide a calculation of density based on net residential density. There may also be merit in calculating the plot ratio, given the mix of uses. Nevertheless, in light of the location within the White City Opportunity Area and contribution that the scheme is making to place shaping in the area, a high density scheme would be appropriate for this site, reinforced by its high quality design and access to public realm and open space.

Tall buildings and urban design

38 The site is located in the White City Opportunity Area and pre application discussions focused on delivering the key urban design elements of the OAPF. These are largely achieved and reflected within the current scheme, which is welcomed. and should ensure that the redeveloped listed building plays its part in securing the wider regeneration of the area.

39 The iconic elements of the scheme, comprising Studios 1 to 3 and the circular Helios Courtyard, are retained as is the northern office wing, although the latter is much altered inside to form contemporary office space aimed at creative industries. All these key elements are sensitively considered and the reuse of the key historic elements and of the less significant elements of the scheme has been approached in a well-considered and imaginative way. The applicant's and the design team's overall approach is exemplary, and the setting of the listed building and its relationship to the surrounding area will be considerably enhanced.

40 In terms of the developments plan, a new route will be opened through the 'doughnut' building which will link Hammersmith Park to the new White City Green, delivering one of the key east-west routes across the wider opportunity area and ensuring activity that would compliment the new retail uses proposed at the base of the building and ensure that the space around the TV Centre is perceived as part of the public realm. As noted in the transport comments below, further detail on the nature of the route through the building would be helpful to ensure that it is large enough and easily readable as a space through which the public can pass. The forecourt design integrates well with White City Green, and the developer is encouraged to work with Westfield and Berkeley Group to investigate the potential decking of the Central Line cutting.

41 In addition new routes are provided around the perimeter of the 'doughnut' and through the Hammersmith and City Line cutting the add considerably to the permeability of the wider area, connecting the major residential and retail uses and green spaces and delivering the other key elements of the OAPF Urban Design Strategy. These are major civic gestures that are strongly supported.

42 To the western side of the building, the reconstruction of the outer ring of the 'doughnut' to provide new residential development replaces the existing monolithic back wall of the BBC TV centre with an elegantly articulated facade with balconies and set backs on the upper floors that would provide overlooking and engagement of the park, considerably enhancing the park's setting.

43 The overall height mass and bulk of the development has paid due deference to the listed building and the wider townscape. On redevelopment, there can be a tendency to push the limits, however in this instance the development team have taken a reasonable and contextual approach, which is welcomed. The provision of town houses to the south of the site help to manage the change in scale from the core of the site to the 2 /3 storey terraces to the south.

44 The current draft of the OAPF supports the principle of increasing the height of the East Tower building if that can be done in such a way as to improve its appearance and providing that it does not have a detrimental impact on the setting of the listed building and adjacent conservation areas. The current scheme increases the height of the building to 22 storeys from 15 storeys. The townscape analysis shows that the existing building makes little contribution to the local townscape and is very bland and utilitarian. The proposed tower, whilst taller, is more elegantly proportioned and articulated with the elevation being split into a larger 4 storey grid. Whilst the tower and some of the other plots, such as C and E are visible above the roof line of the two and three storey terraces to the south of the site, such as at Stanlake Terrace, the exsiting tower is already visible in these views as is the car park in other views. Given the overall scale of what is proposed and the high quality of its architecture it is not considered that there would be harm to the local townscape. Similarly along Wood Lane the replacement of the multi storey car park with new residential accommodation would considerably enhance the character of Wood Lane. The East Tower will also be visible in views across White City Green where it will serve as a vertical foil to the more horizontal mass of the main BBC TV Centre. In addition the OAPF identifies the importance of the tower in views east west across the Westfield site as a means of orientating pedestrians and providing way finding across the OA.

45 The architectural quality of the scheme has been carefully considered and compliments the setting of the listed building maintaining and reflecting the spirit and character of the original building without slavishly copying it.

46 The overall quality of the residential elements of the scheme is high given the constraints of working within a listed building and the strong geometries that need to be designed around.

47 In summary, this is an exemplary scheme that reflects well on both the client and design team and makes a significant contribution to the delivery of the White City Opportunity Area.

Inclusive design

48 The application is accompanied by an access statement, addressing both the masterplan and individual plots. Given the prominence and challenges to the site in terms of the listed buildings, existing routes, range of uses and level changes, there have been a series of pre-application discussions about the proposals in an effort ensure that the highest standards of

inclusive design are achieved on this significant regeneration site, that would continue to receive a number of visitors, as well as catering for residents and workers. The scheme has also been subject to discussion with the Hammersmith & Fulham Disability Forum.

49 Key issues to date have been the design of the shared surface and taxi rank, ramp systems for the site and routes to the World Service Building Entrance and down to the railway arches. The Disability Forum has also noted some concerns regarding the step-free routes, shared spaces, car park, housing layouts, wheelchair accessible and Lifetime Homes standards. At the time of writing, these points were the subject of further discussion and clarification it is expected that the outstanding points are satisfactorily resolved before the application is reported back at Stage 2.

50 The above points aside, the applicant has committed to ensuring that 10% of the residential units and hotel rooms would be designed to wheelchair accessible housing standards or capable of adaption, with access to a second lift being made available for all units above ground floor level. Typical floor plans are provided for the detailed applications showing these units. These commitments should be secured by way of condition, together with a requirement that the outline elements also achieve the same standards. In terms of Lifetime Homes, it is acknowledged that in the case of the listed buildings that there are some areas where it is difficult to achieve all the relevant standards, and the applicant has set out its commitment to best practice, which is welcomed. More detailed assessment would be expected at reserved matter stage. Commitments to achieving level access and inclusive work space should also be secured.

51 In terms of parking, the scheme includes 52 Blue Badge Bays at upper and lower basement, located in reasonable proximity to lift/stair cores. Given the parking levels are below the expected one space per wheelchair accessible unit, a car parking management plan would be appropriate so as to ensure that there are sufficient blue badge spaces kept available for the accessible units. The management of taxi drop-off and community transport points should also be subject to a management plan.

Climate change mitigation

52 In this instance the applicant has presented two options for its proposed energy strategy. The first is a "conventional approach" in accordance with the Mayor's energy hierarchy, and the second is an "alternative approach" that prioritises the use of renewable energy.

53 In considering the first approach, the applicant is proposing to reduce carbon emissions by 38.9%, thus exceeding the London Plan requirement.

Energy efficiency

54 In total, 26.5% savings will be achieved from energy efficiency measures - 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 (MVHR), efficient lighting controls, variable speed drives and high efficiency services. The demand for cooling will be minimised through high performance glazing and low energy lighting. It is noted that these savings appear high and should be supported by further evidence. The applicant should provide further information (e.g. SAP and BRUKL sheets) demonstrating how these savings will be achieved.

District heating

55 The applicant has carried out an investigation and has not identified any existing district heating networks within the vicinity of the proposed development. The GLA is aware of the proposed White City district heating network, the applicant should investigate and provide further information on the White City district heating network and how this site will be developed to align with the plans for the wider area. The applicant has provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available, however further information is needed on connection opportunities as mentioned above.

56 The applicant is proposing to install a site heat network however, confirmation that all apartments, rooms within the hotel and non-domestic building uses will be connected to the site heat network. A drawing showing the route of the heat network linking all buildings on the site should be provided. If the development is phased, the applicant should show on the drawing(s) how the network will evolve in relation to the phasing of the development.

57 There also remains outstanding information confirming that the site heat network will be supplied from a single energy centre. Details of the floor area and location of the energy centre should be provided and clearly shown on the development plan drawings. The system would need to be secured in the s106 agreement.

CHP

58 A total of 9.21% savings will be achieved from a combined heat and power plant, which will provide the lead source of heat for the site wide energy network. Further information should be provided on the load profile and the proposed size of the CHP engine to be installed as a lead heat source. The CHP size should be optimised in relation to the heat demand of the development. Confirmation should also be provided that the hotel rooms will be connected to the site heat network served by the CHP.

Renewable energy

59 The applicant states that 4,000 sq.m. of roof space is available for photovoltaic installation giving a further 8.6% savings. Further information should be provided on the estimated amount of PV (sq.m. and/or installed capacity) that is proposed to be installed.

Alternative energy approach

60 The applicant has presented a preferred approach in relation to its energy strategy and is seeking support for this alternative system. The difference relates largely to the prioritisation of renewable energy (comprising of photovoltaic modules, solar hot water panels and heat pumps supplemented with gas fired boilers) and the absence of CHP in the preferred approach. This approach results in additional carbon savings of 0.9%. The applicant notes that this system has greater resilience to utility price increases, is more flexible and enables a building by building phasing, and is future proofed to enable heat exchangers to be installed for connection to a low/zero carbon district heating systems. The applicant is suggesting that in the future, it will be less carbon efficient to produce heat with a gas fired CHP plant than a gas fired condensing boiler.

61 Whilst the applicant's commitment to achieving the highest level of carbon dioxide savings is acknowledged, the London Plan and draft OAPF clearly prioritise CHP networks that enable future connection into larger, low carbon district heating networks over the provision of renewable energy. The applicant has not demonstrated that a policy compliant approach is not viable or that there are special circumstances in this case to justify an exception to policy. Furthermore, given

there is such a marginal difference between the two systems and that this is a hybrid application, there is even less of a case to be made to pursue the alternative approach. The approved technology is required to complement a site wide heating system, that can also link into a wider network in the future and this would need to be secured in the s106 agreement. On this basis, the alternative approach put forward by the applicant is not supported.

Climate change adaptation

62 The applicant has submitted a sustainability statement, carried out in accordance with LBHF and GLA guidance, and including relevant Code for Sustainable Homes and BREEAM pre-assessments. It is intended that all homes meet Code for Sustainable Homes Level 4 and 'Very Good' for the hotel and commercial space. The documents set out a number of techniques proposed to reduce energy consumption and cut carbon emission in line with the Mayor's standards. This includes use of energy efficient measures such as high performance facade, reduced electric lighting heating gains and good lighting controls, high efficiency heat recovery units for ventilation and the use of efficient central plant and equipment.

63 Water saving measures are proposed to achieve a 30% reduction in water use, together with rainwater harvesting and sustainable urban drainage is proposed with surface water reductions being achieved primarily through the use of attenuation storage and controlled surface water flooding. Additional surface water reductions will be achieved through the use of green roofs, and together with green wall systems, planting and boxes this would aid biodiversity enhancement. Details of this and other sustainable which should be secured by way of condition. The applicant is also encouraged to examine opportunities to divert or store rainwater within the public open spaces. In particular there are emerging good examples of utilising rainwater as a form of art/interest whereby rainwater can add visual interest and excitement, potentially with some temporary storage within the public realm.

Transport

Parking

64 The scheme proposes a maximum of 455 parking spaces for the 1,025 residential units, which equates to a ratio of one space per unit for the proposed townhouses, 0.4 spaces per unit for flats and an additional 0.04 spaces per unit for visitor parking. The area has a high level of public transport accessibility and suffers from congestion on the local road network. The strategic transport study carried out as part of the of the OAPF supports this, as concluding that a ratio of between 0.2 and 0.4 spaces per residential units is necessary to avoid unacceptable impacts on the local highway network. As such, parking provision should be reduced by a minimum of 45 spaces, and preferably further to encourage travel by sustainable modes. This aside, blue badge parking is being proposed in line with Lifetime Homes standards and electric vehicle charging points (EVCP) in line with London Plan standards.

65 The approach to car parking for the new non-residential uses is restrained, with 20 spaces for the office use, five spaces for the retail and leisure uses and a further three spaces for the hotel. This provision is predominantly for blue badge and operational uses, and is acceptable although EVCPs should be included within this provision, in line with London Plan standards.

66 The scheme proposes three car club spaces on site, with the initial year's membership for residents who do not own a car parking space as well as for all commercial uses on site funded through the Travel Plan. This is supported and should be secured through the section 106 agreement. As it is unclear how parking spaces will be purchased or allocated, the offer of free car club membership should be made to all residents to encourage them to not take up car

ownership or a car parking space. In addition, a car park management plan should be secured through the section 106 agreement, with a mechanism to ensure that the supply and demand of parking is reviewed, such that provision relates to any change in demand and that designated bays are effectively enforced.

67 Given the size of the hotel, coach parking would not be anticipated however, both the hotel and leisure uses on site may attract some coach trips, and as such a coach pick up and drop off point convenient for both uses should be provided, even if parking is not permitted.

Trip generation

68 As highlighted in the detailed comments directly to the borough, TfL has a number of technical concerns relating to the trip generation methodology that has been adopted for both the previous BBC use and the proposed uses on site. Until these issues are resolved, TfL are not able to reach any conclusions on the impact of the development on the capacity of the transport network, and therefore the level of mitigation that is required. Despite this a number of transport interventions are included in the White City DIFS, such as step free access at White City station, improvements to Shepherd's Bush Overground station, and various highway capacity improvements and interventions. It must be noted that enhancements to bus services would not be covered by CIL, and therefore contributions would have to be secured through the section 106 agreement.

Protection of infrastructure

69 Plots E, F, G and H are in close proximity to the Hammersmith and City line viaduct, and therefore appropriate controls will need to be placed on any permission to ensure that these will not result in an unacceptable impact on London Underground infrastructure. TfL have provided a suggested condition to the planning authority which must be applied to any consent, in line with London Plan policy 6.2.

Pedestrian and cycle environment

70 Audits of local public transport waiting areas and the surrounding pedestrian and cycle environment are expected support of the application, and these should be carried out and/or provided to TfL before the application is reported back at Stage 2.

71 This aside, the provision of new pedestrian and cycle links through the Question Mark buildings is supported - increasing access to Hammersmith Park and Wood Lane station for residents in the surrounding area. However, it is understood that security controls at the site are to be changed rather than removed and clarification on how access will be controlled should be provided. For example, it is uncertain whether the routes through the site would be open for supporters to access Loftus Road stadium before and after QPR matches, and whether the capacity of the route needs to be assessed to ensure it can accommodate this level of flow.

72 The scheme allows for the potential provision of a north-south pedestrian and cycle route between Plot G and the Hammersmith and City line viaduct, which would allow the creation of a link between the site and Shepherds Bush Market. Although this is welcomed, the applicant should clarify the width of the route that has been safeguarded. This would then feed in to further feasibility work which would be necessary to ascertain whether this route could accommodate cyclists and pedestrians safely, and further discussion would be appropriate in order to secure works or section 106 contributions towards delivery as appropriate.

73 The applicant is also encouraged to identify current pedestrian wayfinding in the vicinity of the site and identify locations for Legible London signage. This would encourage better use of routes through the site and open spaces such as Hammersmith Park. Signage should be funded through the section 106 agreement; a pair of signs usually cost around £10,000.

74 Given that the access to the multi-storey car park on Wood Lane will be removed as part of these proposals, the application proposes to widen the footway on Wood Lane adjacent to Plot H. This is supported and the requirement for this to be delivered through a section 278 agreement should be secured via an appropriate condition or planning obligation.

Cycle parking

75 Provision of cycle parking for all land uses is made in the scheme, in line with London Plan Revised Early Minor Alterations (REMA) standards. It is understood that all cycle parking will be provided within the lower ground floor and basement car parks, and appropriate conditions should therefore be secured on any consent requiring submission of details and routes to and from cycle stores.

Travel plan, servicing, deliveries and construction logistics

76 Although a standalone Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP) have not been submitted, the transport assessment contains information on construction and servicing arrangements, and details the principles that will be included within a CLP and DSP. The requirement for a CLP to be submitted and approved prior to commencement and a DSP prior to occupation of the development should be secured by condition on any consent. The outline principles of both the CLP and DSP appear sensible, although the CLP should also recognise that cycle safety measures are enforced during construction particularly in respect of construction vehicles being fitted with cycle specific safety equipment, including side-bars, blind spot mirrors and detection equipment to reduce the risk of collisions with cyclists.

77 A Travel Plan has been provided as an appendix to the transport assessment. Although much of the content is good, and the roles and responsibilities of the Travel Plan co-ordinator are well considered, there is a lack of information about the development itself. To function as a standalone document, the Travel Plan should include details of the type and quantum of the development, as well as providing an initial estimate of mode share and person trips for the various uses on site. Contact details for the Travel Plan author should also be included. It should also make a commitment to all surveys being in accordance with the TRAVL methodology. The Travel Plan should be secured, enforced, funded, and monitored as part of a section 106 agreement.

CIL

78 In accordance with policy 8.3 of the London Plan, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. All new developments that create 100 m² or more of additional floor space are liable to pay the Mayoral CIL. The levy is charged at £50 per square metre of additional floor space in LB Hammersmith and Fulham.

Local planning authority's position

79 The Council is still reviewing the application and is expected to report the application in October 2013.

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 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

81 There are no financial considerations at this stage.

Conclusion

82 London Plan policies regarding opportunity areas, mix of land uses, housing, affordable housing, tall buildings, urban design, access, climate change and transport are relevant to this application. The application broadly complies with the London Plan, there are some outstanding issues that need to be resolved and these and their potential remedies are set out below.

- **Principle of development**: The principle of a residential-led mixed use development with offices, television studio/leisure and other commercial space is acceptable on this regeneration site in the White City Opportunity Area.

- **Housing:** The applicant is still to confirm its affordable housing offer, and the viability assessment should be independently assessed in the context of the WC DIF tariff. Details of this, together with confirmation of the tenure and review mechanism should be shared with the GLA prior to the Stage 2 referral to ensure a scheme that is compliant with London Plan housing policies. Further details of the children's play areas needs to be provided and secured by condition. The density needs to be calculated. The residential quality in some areas requires qualifying.

- **Urban design and tall buildings:** The design is of a high standard, preserving and enhancing the character of the listed buildings and conservation area, and making a positive contribution to the White City Opportunity Area, public realm and the skyline.

- **Inclusive design:** Whilst the inclusive design provisions that have been made are welcomed, together with commitments to achieving 100% Lifetime Homes and 10% wheelchair accessible flats, there are several areas where further information and discussion is required. This relates to routes, ramp systems, entrances and drop-off points in particular.

- **Climate change:** The applicant has presented two options for the energy strategy. In relation to the conventional approach, the applicant has broadly followed the energy hierarchy to reduce carbon dioxide emissions however, further revisions and information is required before the proposals can be considered acceptable and the carbon dioxide savings verified. The alternative approach is contrary to policy and is not supported.

- **Transport:** a number of transport issues as detailed above require resolution in respect of the transport assessment and proposed mitigation in order to ensure compliance with the London Plan.

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