Fulham Gasworks
in the London Borough of Hammersmith & Fulham
planning application no. 2016/02983/COMB

Strategic planning application stage 1 referral

The proposal
Hybrid planning application (part outline, part full) for demolition of existing buildings and structures (excluding listed buildings) and redevelopment to provide a residential-led mixed-use development comprising the erection of new buildings ranging from a single storey pavilion up to 27 storeys to provide up to 1,375 residential units (297 of which in full) (Class C3) and a total of 13,129 sq.m. non-residential uses (Use Classes A1 - A4, B1, B8, D1 and D2), the provision of a new publically accessible open space, new pedestrian and vehicle routes, accesses and amenity areas, basement level car park with integral servicing areas and other associated works.

The applicant
The applicant is St William and the architect is Robin Partington Architects.

Strategic issues summary
Land uses: residential-led redevelopment of this disused gas facility is supported, but the applicant should commit to providing replacement cultural and employment uses, including affordable workspace and shops. (paragraphs 18-28)

Open space: quantum of open space broadly supported, but the applicant should address concerns about the usability and quality of the spaces. (paragraphs 21-23 and 44-47)

Housing: the absence of an affordable housing offer at this stage is a significant concern and the applicant should address concerns raised in respect of the proposed mix. (paragraphs 29-41)

Urban design: broad masterplan approach supported, but significant concerns are raised in respect of the relationship of some blocks to the public realm, the layout in some areas, the design code and residential quality. (paragraphs 42-51)

Heritage: the applicant should seek to retain the locally listed Gasholder No.7 within the masterplan, if possible. (paragraphs 52-59)

Transport: contributions required towards buses and station upgrades (paragraphs 73-94)

Recommendation
That Hammersmith & Fulham Council be advised that, whilst the principle of the proposal is supported, the application does not comply with the London Plan, for the reasons set out in paragraph 98 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan.
Context

1 On 19 July 2016 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 29 August 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

- Category 1A: “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”.
- Category 1C: “Development which comprises or includes the erection of a building more than thirty metres high and outside the City of London”.

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

Site description

5 The 6.52 hectare site comprises a former gas storage facility located between Imperial Wharf and the Kings Road. The site is bound to the north by Michael Road and Gwyn Close and to the south and west by Imperial Square and Imperial Road. To the south east is the Chelsea Creek development (GLA reference PDU/2388a, Council reference 2011/01472/COMB), currently under construction, whilst to the north east is the West London Line. The site was previously used for gas production, but the gasholders have been decommissioned and only the gas pipelines, gas governor and pressure reduction station (PRS) remain in use. A planning application is currently being considered for a replacement PRS at the northern end of the site (Council reference 2015/04762/FUL). A number of the redundant buildings on the site are let on a short term basis to small businesses and art galleries.

6 Part of the site is located within the Imperial Square and Gasworks Conservation Area, along with the Imperial Square cottages to the west. The disused Gasholder No.2, Chief Engineer’s Building, Research Laboratory and War Memorial are all Grade II listed, whilst Gasholder No.7 is locally listed. Much of the site is also located within Flood Zone 3. The site is also located within the South Fulham Riverside Regeneration Area, which is designated in the Council’s Local Plan and for which an SPD has been adopted.

7 The closest part of the Transport for London Road Network (TLRN) is the A3220 which lies approximately 1km to the north east. The A308 (Kings Road) to the north of the site, and A217 (Wandsworth Bridge Road) to the west, form part of the Strategic Road Network (SRN). When an internal route network is established, most parts of the site will be within a 12 minute (960 metres) walking threshold to Fulham Broadway Underground station which is served by the District Line (Wimbledon branch). The entire site will be within walking distance of Imperial Wharf national rail station on the West London Line. Passenger services on the West London Line include frequent London Overground services from Stratford/Willesden Junction to Clapham Junction and hourly Southern services from Milton Keynes to South Croydon. There are also ten bus routes within walking distance to
the site. Due to the size of the site the public transport access level (PTAL) from the site boundary varies from 2 to 6a, on a scale of 1 to 6b where 6b is most accessible. Currently, vehicular access to the site is from Sands End Lane through the junction with Edith Row/Michael Road/Waterford Road. There is a further vehicular access via the link road to Imperial Road south east of Fulmead Street.

**Details of the proposal**

8. This is a hybrid planning application seeking permission for the comprehensive redevelopment of the site for a mix of uses, partly in detail and partly in outline. The table below sets out the total floorspace sought:

<table>
<thead>
<tr>
<th>land use</th>
<th>Use Class</th>
<th>maximum floorspace (GEA, sq.m.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>residential</td>
<td>C3</td>
<td>161,768</td>
</tr>
<tr>
<td>retail/café/restaurant</td>
<td>A1-A4</td>
<td>5,213</td>
</tr>
<tr>
<td>office</td>
<td>B1</td>
<td>5,362</td>
</tr>
<tr>
<td>community/leisure</td>
<td>D1-D2</td>
<td>420</td>
</tr>
<tr>
<td>National Grid Depot</td>
<td>B8</td>
<td>2,134</td>
</tr>
<tr>
<td>residential facilities</td>
<td>ancillary to C3</td>
<td>1,603</td>
</tr>
<tr>
<td><strong>total</strong></td>
<td></td>
<td><strong>176,500</strong></td>
</tr>
</tbody>
</table>

9. The residential floorspace equates to a maximum of 1,375 flats, 297 of which would be in the detailed component, which is hatched on the below development plot plan. The retail and office uses are generally located on the ground floor of the blocks. As part of the contractual arrangement with National Grid, the applicant will be providing a new depot building with ancillary facilities, fronting Imperial Road – this is within the outline element of the scheme, in block B2.
The masterplan would create a network of predominantly pedestrian streets, although a new road link is proposed between Michael Road and Imperial Road. New public open spaces will be created, including a 0.78 hectare park and a 0.37 hectare square. The statutorily listed buildings are all proposed to be retained, with the Chief Engineer’s Building and Research Laboratory refurbished for commercial use and Gasholder No.2 retained in its original location, but as part of the landscape design for the new park.

A large basement area is proposed, comprising the majority of parking and servicing requirements. 119 car parking spaces are proposed for the detailed element of the scheme, with a maximum ratio of 0.4 spaces per unit for the rest of the scheme. Cycle parking and an energy centre is also proposed in the basement.

The building heights vary across the scheme, with the majority of the blocks ranging between 7 and 12 storeys. There will also be four towers of 16, 17, 18 and 27 storeys along the eastern boundary of the site with the Chelsea Creek development. The outline component of the scheme is proposed with all matters reserved, but design details would be controlled through parameter plans and a design code.

Case history

Changes to the way gas is stored within the distribution network has made the gasholders redundant and they were decommissioned in 2012. Planning permission was granted on 5 March 2015 for the demolition of five redundant gasholders and three ancillary buildings, including remediation and site levelling works (Council reference 2014/03637/FUL). This was approved subject to a S106 agreement requiring a building contract for the wider redevelopment of the site to be entered into prior to the demolition of the locally listed Gasholder No.7.

Some of the gas pipelines on the site remain in use at present and as part of the redevelopment, National Grid will require certain infrastructure to be provided. An application has been submitted by National Grid, and is currently under consideration, seeking permission for a replacement pressure reduction station (PRS), associated structures and compound with access from
Cwyn Close (Council reference 2015/04762/FUL). This is the only part of the existing gasworks site that does not form part of the current application and the relocation of the PRS is part of the enabling works required to bring the site forward.

15 The application scheme considered here was subject to formal pre-application discussions with GLA officers, with a pre-application meeting being held on 28 April 2016. GLA officers supported the principle of the residential-led mixed use redevelopment of the site. The key strategic concerns raised included employment, affordable housing, heritage and urban design, with the layout, design code and parameters in particular requiring further work.

Strategic planning issues and relevant policies and guidance

16 The relevant issues and corresponding policies are as follows:

- **Land use principles** London Plan
- **Housing and affordable housing** London Plan; Housing SPG; Housing Strategy; Providing for Children and Young People’s Play and Informal Recreation SPG; Social Infrastructure SPG
- **Density** London Plan; Housing SPG
- **Urban design and heritage** London Plan; Character and Context SPG
- **Tall buildings** London Plan; London view management framework SPG
- **Inclusive design** London Plan; Accessible London: achieving an inclusive environment SPG
- **Sustainable development** London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy
- **Transport and parking** London Plan; the Mayor’s Transport Strategy;
- **Crossrail/CIL** London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG

17 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 Core Strategy (2011), Development Management Local Plan (2011), the draft Local Plan (2015) and the 2016 London Plan. The South Fulham Riverside Supplementary Planning Document (2013) and the National Planning Policy Framework (NPPF) are also relevant.

Principle of development

18 The site lies within the South Fulham Riverside Regeneration Area, which is identified in the Council’s Core Strategy (2011) for residential-led riverside development, providing employment opportunities and visitor facilities. Strategic Policy SFR identifies the area as having the potential to deliver around 2,200 new homes and 300-500 jobs, although it is noted that the Draft Local Plan (2015) increases the housing target to 4,000 homes. The Draft Local Plan and South Fulham Riverside Supplementary Planning Document (SFRSPD) support the comprehensive residential-led redevelopment of the site with supporting community facilities and open space.

Employment and culture

19 There are a number of existing buildings on the site that are in use for a variety of purposes, primarily as business space for local creative sector firms, but also as art galleries. The applicant’s environmental statement notes that a minimum of 245 people are employed on the site. GLA officers recognise that the temporary relocation of these businesses, many of which are located within the Phase 1 development area, will be necessary to facilitate the development of the site. There is
however the potential to accommodate some of the existing businesses within the 5,362 sq.m. of office space proposed. The applicant should therefore commit to offering a minimum quantum of employment space to local SMEs or agreed workspace providers, and a proportion at affordable rents. The Council should secure these measures through the S106 agreement.

20 Given the presence of a number of art spaces and galleries within the site and the Council’s objective of encouraging visiting infrastructure in the South Fulham Riverside Regeneration Area, the applicant should commit to providing some ground floor space for arts and cultural use. This should be located prominently within the scheme, ideally fronting the village square.

Open space

21 The Council has identified the site as falling within an area that is deficient in public open space and the SFRSPD suggests that around 1.1 hectares of open space should be delivered in the east of the Regeneration Area. The Draft Local Plan proposes a site specific requirement to provide an area of public open space of at least 1 hectare on this site.

22 A total of 3.05 hectares of publically accessible open space is proposed, including a 0.78 hectare park and a 0.37 hectare village square. The figure does not take into account aspects such as the vehicle routes, water features and cafe spill out areas. The applicant should therefore present the open space quantum as net figures and also break them down by type of open space. A plan setting out this hierarchy should also be provided.

23 As discussed in more detail in the urban design section of this report, there are significant concerns over the legibility and usability of the proposed public open spaces. The extent of water proposed and the lack of proper definition and animation to many of the spaces is a particular concern. Further discussion regarding the provision of open space, including the parameter plans and design code which will control its quantum and design, is required before the application can be considered acceptable.

Housing

24 London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London, and sets a target for the Council to deliver a minimum of 10,312 homes in the Plan period 2015-2025. The Council’s Draft Local Plan recognises the potential for the South Fulham Riverside Regeneration Area to deliver 4,000 homes. The principle of housing as part of the mixed-use redevelopment of this site, providing 34% of the housing target for the Regeneration Area, is therefore supported.

Retail, leisure and community

25 London Plan Policy 4.7 requires new out of centre retail development to be subject to an assessment of impact. The Council’s Strategic Policy SFR seeks to ensure that no new major stores are constructed and that new shopping for the day to day needs of residents and workers would be appropriate as part of proposals in this area. A maximum of 5,213 sq.m. of Use Class A1-A4 floorspace is proposed and the applicant is seeking flexibility to deliver a range of unit sizes and types of retail. Up to 420 sq.m. of community/leisure uses (Use Classes D1 and D2) is also proposed. The applicant has submitted a retail assessment, which demonstrates that the likely expenditure from residential occupants of the development is expected to exceed the turnover of the proposed retail space. The proposal would therefore provide genuine walk-to retail facilities for local residents and will help to animate ground floor frontages, as envisaged by the SFRSPD. Furthermore, the expected trade diversion from nearby centres and parades is not expected to be detrimental to the health of those centres.
26 Notwithstanding this, the Council should impose restrictions on the proportion of each A Use Class in order to promote diversity in the retail offer. The maximum floorspace of individual retail units should also be capped and the Council should secure a proportion of the floorspace for small, affordable/independent shops, in line with the requirements of London Plan Policy 4.9. A minimum proportion of floorspace for community uses should also be secured. GLA officers welcome further discussions with the applicant and the Council with a view to agreeing appropriate planning obligations.

Depot

27 As part of the applicant’s contractual obligations with National Grid, the existing depot on the site needs to be replaced as part of the redevelopment. The application therefore proposes a replacement depot on Imperial Road, within Development Plot B2, comprising 2,134 sq.m. of Use Class B8 floorspace and ancillary offices. Whilst this element is in outline and the detailed design of the depot is reserved, it would be a covered facility and has been integrated into the masterplan with controls in place to ensure it would have an acceptable appearance and would not unduly impact on the amenities of future occupiers. This part of the proposal is therefore acceptable in principle.

Summary

28 As set out above, given the site’s context within the South Fulham Riverside Regeneration Area, the principle of the housing-led mixed-use redevelopment of this site is strongly supported, and the provision of retail and leisure floorspace is acceptable in accordance with strategic policy. The applicant should however address comments above in respect of employment and cultural space, and should also clarify and address concerns over the quantum, usability and quality of the proposed public open space.

Housing

29 The application proposes up to 1,375 residential units in total, 297 of which are proposed in the detailed component of the application, in Phase 1 of the development. A housing mix schedule for Phase 1 is provided below:

<table>
<thead>
<tr>
<th>unit type</th>
<th>number</th>
<th>percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>studio</td>
<td>15</td>
<td>5</td>
</tr>
<tr>
<td>one-bed</td>
<td>84</td>
<td>28</td>
</tr>
<tr>
<td>two-bed</td>
<td>141</td>
<td>48</td>
</tr>
<tr>
<td>three-bed</td>
<td>54</td>
<td>18</td>
</tr>
<tr>
<td>four-bed</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>total</td>
<td>297</td>
<td>100</td>
</tr>
</tbody>
</table>

Table 1: detailed component housing mix

30 For the outline component, the development specification and parameters document specifies a target mix for later phases of the development, in line with Table 2 below:
Affordable housing

31 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. The applicant has not yet submitted a viability assessment. The absence of any viability information or an affordable housing offer at this stage raises significant concern, given that scheme of this size and scale must deliver a substantial quantum of affordable housing, in each phase of development. The applicant is strongly advised to approach registered providers to inform the affordable offer, as well as prioritising affordable family housing.

32 GLA officers will work closely with the Council to ensure that the viability is robustly assessed and that affordable housing delivery is maximised. GLA officers will also expect there to be a review mechanism built into the S106 agreement to seek an increase in on site provision as part of this phased development, should viability improve after grant of outline planning permission.

Residential mix

33 London Plan Policy 3.8, together with the Mayor’s Housing SPG, seek to promote housing choice and a balanced mix of unit sizes in new developments. London Plan Policy 3.11 establishes that strategic priority be afforded to the provision of affordable family homes.

34 As set out in Table 1, as part of the detailed component of the scheme, a total of 19% of units are proposed for family accommodation, although no detail has been provided on the proposed tenure of these units. It is therefore not possible at this stage to determine whether affordable family accommodation has been prioritised in accordance with London Plan Policy 3.11.

35 With regard to the outline component, there are concerns about the broad percentage targets set out in Table 5 of the development specification and parameters document. These wide ranges do not give enough of a guarantee over the future housing mix and could result in an exceptionally low delivery of family housing. The applicant should tighten up these controls in consultation with the Council and GLA officers. Again, there is an expectation that affordable family housing is prioritised and GLA officers request that a target mix is included for affordable rent and intermediate tenures.

Density

36 London Plan Policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, the design principles in Chapter 7 and public transport capacity. The applicant has calculated the density of the overall proposal to be 211 units per hectare, but has not expressed this as a net density figure, factoring in the proposed ground floor commercial floorspace. Furthermore, no habitable room per hectare figure has been provided. Noting the absence of fixed habitable room quantum figures for the outline component, an illustrative mix should be devised to give a better indication of the likely scheme density, which should be informed by the target mix requested in paragraph 35. Further information is therefore required in order to confirm whether the scheme would fall within the London Plan density ranges. There is not an in-principle objection to high-density development on this site, which is within a locally identified Regeneration Area and has the potential to deliver significant public benefits. As set out in the relevant sections of this report, the

<table>
<thead>
<tr>
<th>percentage of unit type</th>
<th>studio</th>
<th>1-bed</th>
<th>2-bed</th>
<th>3-bed</th>
<th>4-bed</th>
</tr>
</thead>
<tbody>
<tr>
<td>5-20%</td>
<td>15-40%</td>
<td>30-70%</td>
<td>5-35%</td>
<td>0-6%</td>
<td></td>
</tr>
</tbody>
</table>

Table 2: outline component housing mix
application includes the provision of employment space and high quality residential units, which is supported. There are however strategic concerns relating to layout, open space and residential quality that will need to be resolved before the density of the proposal can be fully assessed.

**Housing quality and design**

37 London Plan Policy 3.5 promotes quality in new housing provision, with further guidance provided by the Mayor’s Housing SPG. As set out in the SPG, proposals above the London Plan density matrix should be exemplary. Key factors such as floor-to-ceiling heights, orientation, maximising ground floor individual access points, and number of units per core, are all essential to achieving high residential quality.

38 The residential units would comply with, or exceed, the London Plan and nationally described minimum space standards. All flats in the detailed component would be provided with London Plan compliant amenity space in the form of balconies or roof terraces, as well as 2.5 metre floor to ceiling heights. The ground floor units would have individual entrances from the public realm, which is welcomed.

39 Some amendments have been made to the residential layouts in the detailed component of the scheme following pre-application discussions. Following these amendments, the number of units per core are generally limited to 8, with the exception of two floors in Block A2 where 9 units are proposed, which is acceptable in the overall context. However, the proportion of dual aspect units is low at 44% and the applicant should seek to increase this by incorporating more through units.

40 The design code contains limited information on residential quality for the outline component. Aspects such as unit to core ratios, floor to ceiling heights, individual ground floor entrances and a target for the proportion of dual aspect units must be incorporated and GLA officers request further discussions with the applicant to ensure that the necessary level of detail is included.

**Children’s play space**

41 London Plan Policy 3.6 seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor’s Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance. Using the methodology within the Mayor’s SPG, the applicant has calculated that the detailed component of the development will be home to 33 children, 19 of which are expected to be under five years old. In accordance with the Mayor’s SPG, the development will need to provide, as a minimum, 10 sq.m. of door-stop play provision for every child under-five, and identify facilities for older children. The applicant proposes 330 sq.m. of play space, located in the public realm around the buildings and on the communal roof terrace. These spaces would cater for the needs of the under-12s, with space for older children to be provided in later phases as part of the park design. This approach is supported and would comply with the benchmarks established in the Mayor’s SPG. The Council should secure details of the on-site play space by condition and GLA officers request further discussions to ensure that a strategy for the delivery of play space is incorporated into the design code.

**Urban design**

42 The overall approach to the masterplan, including the network of public routes, scale, massing and quality of architecture is supported. There are however significant concerns over the layout of parts of the masterplan, which affects in particular the quality and usability of the public open space within the scheme. There are also significant concerns over the content of the design code document. These concerns are set out in more detail below and need to be fully addressed before the proposals can be considered acceptable.
Layout and public realm

43 The masterplan comprises three character areas, consisting of a conventional block and pedestrian route layout in the Imperial Quarter and the Garden Quarter, with the Park View character area comprising a series of blocks set in open space adjacent to the proposed park. The main central proposed spine route through the site, known as Sands End Lane, has been designed as a wide ‘village high street’ space, flanked by retail and cafe uses, with the potential to be used for a variety of purposes, including exhibitions. This would link into the adjacent Chelsea Creek development. The overall masterplan approach is supported and would improve pedestrian permeability between Kings Road and Imperial Wharf station, whilst ensuring an enhanced setting for the statutorily listed buildings on the site.

44 There are however significant concerns over the interaction between the ground floors of a number of the blocks and the public open space. This is a particular concern in respect of Blocks H1 and H2, which currently have limited entrances and fail to properly animate both the park and the public space created as a result of the gas main easement. The provision of water surrounding these blocks is also not supported, as this further restricts the ability of the blocks to address the public realm and the extent of water proposed also affects the usability of the proposed open space. GLA officers therefore reiterate advice provided at pre-application stage that these blocks must maximise the number of ground floor entrances. Illustrative ground floor layouts should therefore be provided to demonstrate how this can be achieved, with the details to be controlled through the design code.

45 Further work is also required to ensure that the space between Blocks E2 and E3 is well defined as a private courtyard. At present the extent of the proposed drop off area weakens this part of the park edge and undermines the legibility of the adjacent pedestrian routes. GLA officers suggest that the building line is extended across this space, to give improved definition to the park edge.

46 There are also concerns over the design of the park entrance from Sands End Lane, which is constrained by the siting of a pavilion style cafe with spill out space, the proposed access road and water feature. Early ideas for amendments to this layout appear promising, but further consideration will need to be given to the detailed layout of this important area, to ensure that the park access appears inviting for pedestrians. GLA officers welcome further discussions on this aspect.

47 With regard to the detailed component, the amendments made following pre-application discussions to reduce dead frontage and increase residential core entrances are welcomed. However, there remain concerns over the central courtyard drop off space, which has limited potential for activation from surrounding uses. GLA officers request that this space is decked over to provide more communal amenity space and an improved relationship with the flats above. The extent of internal communal residents facilities and concierge space is also a concern and the applicant should demonstrate how these spaces will be genuinely active to the street.

Scale and massing, strategic views

48 The scheme proposes predominantly 7-12 storey linear blocks, which would be in keeping with the emerging scale of development in the Imperial Wharf area. In addition, four taller tower elements of 16, 17, 18 and 27 storeys are proposed along the south-eastern boundary and adjacent to the railway line. The scale of these buildings would be similar to other consented tall buildings nearby, including the adjacent Chelsea Creek development and the Lots Road Power Station scheme. As such, the scale of the proposal is considered acceptable in principle, however given that the tall buildings are within the outline element, it will be important that the design code gives appropriate controls over the quality of design.
Given the siting and scale of the proposed towers, there would not be an adverse impact on any of the strategic views identified in the Mayor’s London View Management Framework SPG. The buildings would however appear prominently in the settings of a number of nearby conservation areas and listed buildings – this is discussed in more detail in the heritage section below. Furthermore, whilst the scale of development is broadly acceptable, in order to comply fully with London Plan Policy 7.7 the relationship to the public realm must be improved by addressing the concerns raised in paragraph 45 above.

Architectural treatment

As mentioned, three character areas are proposed and this is reflected in the appearance of the buildings. The Imperial Quarter would have an industrial character, reflected in the predominant use of red brick and dark metal, which would complement the retained listed buildings. The Park View towers would have a ‘free-form’ approach to their design, incorporating extensive glazing and cladding materials. The Garden Quarter would transition away from the park towards the surrounding residential area, with stone cladding, set back metal upper floors and buff brick elements. The overall approach to the appearance of the buildings is supported; however the quality of detailing and specification of materials will be critical to the appearance and durability of the scheme. The design code will need to give the necessary guarantees that such quality will be carried through into the detailed designs, particularly in relation to the tall buildings. The Council is also strongly encouraged to utilise appropriate conditions securing design detail and materials.

Outline component

Given the hybrid nature of the application, the majority of the plots are not fully designed and would come forward as reserved matters applications, controlled through the design code. As such it will be expected that key principles will be set at this stage through the control documents, namely the parameter plans and design code. These documents should provide clear guidance on aspects such as active frontage, residential core and individual unit entrances, residential layouts and active frontages. There are significant concerns over the wording and content of the design code as submitted and this document requires further work to ensure that it incorporates the necessary level of detail and clarity. GLA officers welcome further detailed discussions once the design concerns raised above are resolved.

Heritage

London Plan Policy 7.8 ‘Heritage Assets and Archaeology’ states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should “have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses” and in relation to conservation areas, special attention must be paid to “the desirability of preserving or enhancing the character or appearance of that area”. Recent judgements have provided detailed consideration of the statutory duty imposed on local planning authorities. The Court of Appeal in Barnwell Manor held that a finding of harm to a listed building or its setting is a consideration to which the decision maker must give considerable weight and importance. The same principle applies to conservation areas, and there should be a strong presumption against granting permission that would harm the character or appearance of a conservation area.

The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and
may derive from a heritage asset’s physical presence or its setting. Where a proposed development will lead to ‘substantial harm’ to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

**On-site heritage assets**

54 The Grade II listed Gasholder No.2, Chief Engineer’s Building, Research Laboratory and War Memorial will be retained in their current locations, which is welcomed. The Grade II listed Gasholder No.2 dates back to 1830 and is reputed to be the oldest gasholder in the world. Its retention as the central focal point of the new park is strongly supported. The other listed buildings would be re-used for commercial purposes, appropriate to their historic purpose and complimentary to their new locations as part of the village high street space. Subject to detailed reserved matters and listed building consent applications, the settings of these statutorily listed buildings would be enhanced and public access and appreciation of these heritage assets would be improved, which is supported.

55 The proposal would however result in the loss of locally listed Gasholder No.7. The NPPF makes clear that where a proposed development will lead to substantial harm or total loss of the significance of a heritage asset, consent should be refused, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits to outweigh the harm or loss. It is however noted that there is planning permission for the demolition of this structure (Council reference 2014/03637/FUL), albeit subject conditions and S106 obligations requiring its permanent retention to be further explored as part of future redevelopment. As such, the applicant must demonstrate through a design exercise that it is not possible to retain the gasholder frame as part of the scheme.

**Setting of off-site heritage assets**

56 The proposal has the potential for visual impact on the settings of other nearby conservation areas and listed buildings. The applicant’s townscape, heritage and visual impact assessment (THVIA), sets out a number of proposed views showing the potential impact the development would have on nearby heritage assets. In particular, the Lots Village, Studdridge Street, Moore Park and Brompton Cemetery Conservation Areas are close to the site and there are a number of listed buildings located nearby, most notably the Church of England Chapel and Arcades of the Brompton Cemetery, which have special historic interest in terms of their architectural design and detailing, as well as their landscape arrangement along a symmetrical, axial alignment.

57 The taller elements of the scheme would be visible in the settings of a number of the surrounding conservation areas, in particular Lots Village, Studdridge Street and Moore Park. However, these are urban conservation areas from which a number of existing tall buildings are visible and as such there would be no harm to the setting of these heritage assets, subject to high quality design being achieved at reserved matters stage.

58 The 27 storey tower would be very clearly visible in views from the Grade I registered Brompton Cemetery, above the Grade II* listed colonnade and other listed funerary monuments. There are already a number of instances of tall buildings visible in this setting, including the Empress State Building (built in 1958-61 comprising 28 floors with an additional 3 floors added in 2003) and the consented Lots Road Power Station scheme, which is a detailed approval. In the majority of views looking south along the axial route the proposed tower would rise above the listed colonnade and/or individual monuments. Of particular concern is the impact shown in View 29B whereby the wireline of the maximum development plot parameter shows the potential for the tower to coalesce with the cupola of the listed colonnade. The applicant should demonstrate through the design code and more
detailed illustrative CGs that a more slender design than that shown as a maximum parameter, with a more elegant silhouette, will be achieved through detailed design.

59 In summary, the applicant should seek to retain the locally listed gasholder, if possible, and provide further detail to justify the impact of the tallest building on the Brompton Cemetery, in order to ensure that the proposal complies with London Plan Policy 7.8 and the NPPF.

**Inclusive design**

60 In accordance with London Plan Policy 3.8, the applicant has confirmed that all of the residential units will meet Building Regulation M4(2) standards, and that 10% of the units will be designed to be fully adaptable and adjustable to wheelchair users (M4(3) standards). However, the design and access statement for the detailed component does not specify where the accessible units will be located. This should be confirmed to ensure that they are spread across unit sizes and tenures. The Council should secure compliance with Building Regulations M4 (2) and M4 (3) by condition, for both the detailed and outline components of the scheme.

61 The proposals would also create new areas of public realm, which are subject to design detail. It is intended that level access is proposed to the commercial units in the detailed component and this should be specified in the design code for the outline component.

62 Furthermore, the applicant should engage with the GLA’s Strategic Access Panel to gain disabled users input on the proposals, based on their personal experience, to ensure that the development achieves the highest standards of accessible and inclusive design in accordance with London Plan Policy 7.2.

**Climate change - mitigation**

**Energy efficiency**

63 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include heat recovery ventilation where appropriate and low energy lighting. The demand for cooling will be minimised through solar control glazing on sensitive facades and natural ventilation through openable windows.

64 An overheating analysis using thermal dynamic modelling has been undertaken to assess the overheating risk within the conditioned areas of the building; its results demonstrate that all main habitable rooms tested pass the required CIBSE TM52 criteria for all design weather years. However, a few of the apartments fail the future weather scenario (2050). Mitigation measures have been proposed for the spaces failing and these include external shading such as overhangs and louvres on the south-west and south-east façade of the top floor penthouse. These mitigation measures are sufficient to prevent any heavy risk of overheating. The applicant should commit to introducing these mitigation measures.

**District heating**

65 The applicant has identified one potential district heating network at a distance of 450 metres from the development. The applicant has stated that it is unclear when this network would become operational and therefore it has been disregarded from further consideration. The applicant should contact the local borough energy officer to determine the current situation of this network and provide evidence of any correspondence in order to demonstrate that this has been fully investigated. The applicant has, however, provided a commitment to ensuring that the development is designed to allow
future connection to a district heating network should one become available. The applicant is proposing to install a site heat network and a drawing showing the route of the heat network linking all buildings on the site has been provided. The site heat network will be supplied from a single energy centre. This will be 594 sq.m. in size and located at basement level of Building A2.

66 The applicant is proposing to install a 770 kWe / 872 kWth gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating meeting 75% of the total development’s demand. The applicant has stated that initially the heat demand will be met by gas fired boilers and the proposed CHP will be installed when circa 50%-70% of the homes have been constructed. The applicant should clarify if this approach has been taken into account in the calculations for the detailed phase. It appears as though all areas have been modelled assuming a CHP installation whereas it is understood that a CHP will not be included in the design of the detailed phase. The applicant should therefore update and present the carbon emissions and savings for the detailed phase separately in order to verify the performance of the detailed phase only.

Renewable energy

67 The applicant has investigated the feasibility of a range of renewable energy technologies but is not proposing to install any renewable energy technology for the development. The applicant has stated that the available roof space is limited for PV installation due to the incorporation of brown/green roofs and mechanical plant. A roof layout should be provided clearly indicating any constraints for a likely PV installation.

Summary

68 Overall the measures proposed result in a 41% reduction in regulated carbon dioxide emissions compared to a 2013 Building Regulations compliant development, which exceeds London Plan emission targets. The applicant should however address the above concerns to enable these savings to be verified.

Air quality

69 There are concerns about the location of the proposed energy centre, which would not enable discharge through the tallest element of the scheme and could therefore affect air quality at the higher levels of the taller blocks. London Plan Policy 7.14 requires that air quality impacts are minimised, so the applicant should give consideration to relocating the energy centre and flue to Block H1. Once the location and phasing of the energy centre have been detailed the applicant should undertake a more detailed assessment of the pollution dispersal across the site (including existing roads, proposed site roads and the energy centre). This should be used to understand the limitations and challenges from air quality for each phase of the development and any necessary revisions should be incorporated into the parameter plans and/or design code.

70 The applicant should also propose a strategy for detailed assessment of each phase of the development. The strategy may include local monitoring during the delivery of the scheme so that the model can be further refined in light of the real impacts of the development. Phase by phase assessment and compliance with current policy at the time of each phase should be secured by condition.

Flood risk

71 The flood risk assessment (FRA) confirms that the site is located partly within Flood Zones 1, 2 and 3a (benefitting from existing defences). Residual tidal flood risk will be mitigated for by setting the lowest finished floor levels for the ‘more vulnerable’ land uses at or above the 2100 breach plus climate
change event (i.e. at least 4.64 metres AOD). Occupants will also be eligible for free flood warnings from the Environment Agency. Emergency vehicle access would be possible via Imperial Road. The basements and energy centre will be within the perched groundwater table and will be tanked to prevent water ingress through the structure. In the event of flooding, residents are likely to attempt to rescue vehicles from basements. Consideration should therefore be given to how to make the basements safe (e.g. stairs to upper floors, flood barriers, etc.) in the event of being trapped.

72 Parts of the site are at high risk of significant surface water flooding, as are parts of the wider catchment (particularly to the west and north of the site). The FRA proposes to discharge all of the site’s surface water into the tidal marina within the adjoining Chelsea Creek site. The development will also include green and brown roofs, as well as attenuating water features and storage tanks to accommodate runoff from the 1 in 100 year plus climate change event. It may however be possible to design the drainage system to avoid the need for storage tanks, for example through the use of surface-level pipes or rills, so this should be considered.

Transport

Access

73 The existing access on Sands End Lane at the junction with Michael Road would become one of the primary vehicular and pedestrian access points into the site; this will be accompanied by public realm improvements to make the junction more pedestrian/cycle friendly. On Imperial Road, the existing vehicular access south of Fulmead Street will become a primary access for both vehicular traffic and pedestrians.

74 An internal link road has been proposed through the site between the Micheal Road site access and the proposed access off Imperial Road south of Fulmead Street to allow through traffic movements. The applicant should further assess its impact on the wider highway network including junctions on Kings Road resulting from trip redistribution as the current assessment is not sufficiently robust.

75 In addition, the applicant should undertake further cumulative impact assessment including those proposals that may be forthcoming in the near future, TfL suggests that the use of HAM model would be appropriate in this instance. Such impact assessment shall go beyond local junctions assessed in the TA and needs to consider the impact on a wider area, including the SRN, as well as any proposed changes to Kings Road and its junctions which form part of the site access strategy.

76 The applicant has proposed a number of minor highway proposals which are designed to improve accessibility and safety in the vicinity of the site. These include public realm improvements to the Edith Row/ Michael Road/ Sands End Lane/ Waterford Road/ Harwood Terrace junction and the provision of a pedestrian refuge at Kings Road/ Waterford Road to facilitate crossing movements which are expected to increase. The applicant shall submit a Stage 1 Road Safety Audits for Hammersmith and Fulham Council’s consideration prior to determination.

Trip generation

77 In line with London Plan Policy 6.3, a trip generation and mode share assessment has been undertaken for the residential and office uses. These trip generation estimates are acceptable although the applicant should also provide the TRICS output used for the basis of the estimate for verification in line with TfL transport assessment guidance and assess trip generation for all retail land uses.
Car parking

78 Residential car parking provision is proposed at a ratio of 0.4 spaces per unit; this is below the maximum standards set out in the South Fulham Riverside Regeneration Area (SFRRA) SPD of 0.5. There is scope for further reduction taking into account access to public transport and the potential to encourage use of alternatives. This would also help to deliver the SFRRA SPD policy to minimise parking in order to restrain car trips.

79 The proposal also includes 10 car parking spaces for office use, 6 car club spaces and 16 spaces for the restaurant use at evenings and weekends. The applicant should clarify the number of spaces to be provided in each of the elements, included disabled spaces, and spaces to be equipped with electric vehicle charging points (EVCPs). The applicant should ensure that EVCP provision meets London Plan car parking standards, in line with Policy 6.9. Furthermore, a car parking management plan should be secured by planning obligation/condition.

Public transport

80 The TA estimates that the proposal will add a total of 147 bus trips in the AM Peak. This additional demand would result in a capacity problem on route 391 which runs closest to the site. A financial contribution of £750,000 is therefore required to provide an additional two return journeys over a 5 year period.

81 The eastbound bus stop on Imperial Road is to be re-located for the proposed provision of the National Grid site access. All costs of the bus stop relocation will need to be met in full by the applicant and the new stop will need to be operational before the existing one is closed. This should be secured through the S106 agreement.

82 Despite previous work to lengthen the station platform, both Network Rail and TfL Rail have identified that Imperial Wharf Station is in need of additional station capacity to ease congestion as well as to accommodate the increase in demand from developments, including this proposal. A financial contribution of £1.5 million towards capacity enhancements for the station is therefore required. This will improve vertical station access capacity such as new stairs between the ground floor entrance and the elevated platforms, as well as longer platform canopies to help waiting passengers spread more evenly along the platforms to reduce congestion, subject to a final decision by Network Rail.

Walking

83 The PERS audit concludes that the walking environment in the vicinity of the site is of good quality in general; however there is scope for further improvements at certain locations where footway quality is poor as well as those areas with limited footway width due to obstruction. The Council should secure a package of improvements from the applicant through the S106 agreement.

Cycling

84 In line with London Plan Policy 6.9, the proposal includes 2374 long stay and 102 short stay cycle parking spaces based on the current proposed quantum of the development, which meets the current London Plan cycle parking standards. There is concern that some residential cores do not have direct access to the basement levels, which should be reviewed. The applicant should also review the proposed cycle storage layout given some of the proposed cycle store has a capacity of over 200 bikes; this is contrary to advice in the London cycle design standards (LCDS) for smaller clusters to improve convenience and security. Short-stay cycle parking spaces will be located in the public realm at surface level; these should be conveniently located in overlooked areas. The Council
should condition the submission and approval of final cycle parking details along with the provision of shower and changing facilities for each phase of the development.

85 The London Cycle Network (LCN) route 38 runs north of the site along New Kings Road and Kings Road. Two pedestrian/cycle accesses on Michael Road and Cambria Street have been proposed by the applicant to connect to this route, which is supported. Cycle access will be achieved from Harbour Avenue via Townmead Road and Chelsea Creek to the south and east; and via Fulmead Street and Bagley’s Lane to the west, which is also supported. The establishment of the internal link road would also facilitate cycling to the riverside from Fulham Broadway area. The applicant’s commitment to provide a shared pedestrian/cycle connection to the site boundary adjacent to the rail line would facilitate the provision of a cycle link under the rail line to Lots Road in the future, as identified in the SFRRA SPD. A Cycling Level of Service (CLoS) assessment was undertaken to assess key routes and links in the vicinity, which concluded that the cycling environment will be improved with the planned highway improvements and the availability of the new link road.

**Cycle hire**

86 The proposed public realm improvement at the junction of Michael Road/Edith Road/Waterford Road would require the existing 39 point cycle hire docking station to be re-located. The location for the re-located docking station has been agreed during the pre-application discussions and should be secured by condition or planning obligation. The replacement should accommodate 10 additional docking points (i.e. 49 in total), and be fully operational before the existing facility is closed. All the necessary costs to re-locate the docking station must be met by the applicant.

**Travel planning, construction logistics and servicing**

87 General servicing will be carried out at surface level in loading bays along the link road, with the exception of goods delivery for the convenience store and refuse collection for the entire site. The applicant should clarify whether any longer articulated goods vehicles will be expected for the site and confirm that there will be sufficient basement headroom for the expected goods vehicles to access the loading area. No detail has been provided on the level of servicing trips for the convenience store or other parts of the proposal. Clarification is therefore requested with the estimation of total servicing trips daily and their distribution over the day.

88 TfL welcomes the submission of a framework delivery and servicing plan (DSP), which includes a strategy to regulate and manage servicing and delivery activities within the site. The final implementation of the DSP should be conditioned by the Council.

89 In line with London Plan policy 6.14, a draft construction logistics plan (CLP) has been submitted. However, this does not provide sufficient detail to allow TfL to determine the level of impact arising from the proposal and so to identify the need and extent of mitigation measures required. This should therefore be revised prior to Stage 2 referral and the final implementation secured by condition by the Council.

90 Furthermore, in light of the proposed/forthcoming development proposals in the area, a cumulative construction traffic impact assessment is required to take account of nearby sites including but not limited to Earls Court, Stamford Bridge, Thames Tideway Tunnel and Counters Creek and a requirement for additional assessment construction transport impacts may be required. Control measures may also be needed to minimise impacts on other users of the road network and local residents and businesses. There is potential for the use of rail and/or river transport including Cremorne Wharf for the movement of bulk materials and waste as well as the use of consolidation or holding centres which may be shared with other big construction projects.
A framework travel plan covering both the residential and office elements of the proposal has been submitted, which passed the ATTrbute assessment; however there are number of issues that need further clarification. Notwithstanding this, TfL expects that the submission, approval and implementation of the finalised travel plan be secured by S106 agreement with the Council.

Community Infrastructure Levy

In accordance with London Plan Policy 8.3, the Mayor commenced CIL charging for developments on 1st April 2012. It is noted that the proposed development is within the London Borough of Hammersmith & Fulham, where the Mayoral charge is £50 per square metre Gross Internal Area (GIA).

Hammersmith and Fulham Council has adopted a CIL Charging Schedule for the borough. Charges will apply to relevant developments to ensure that strategic transport and public realm improvements are delivered using CIL where these are included in the borough’s regulation 123 list. However it is understood that provision for transport mitigation for the Fulham Gasworks development will be dealt with through S106 obligations or S278 agreements rather than being secured through CIL contributions.

Summary

In summary, in order to ensure that the proposed development complies with the transport policies in the London Plan, TfL has requested further information to assess the potential impact on the highway network and the applicant should seek to reduce car parking. In addition, contributions towards bus services and Imperial Wharf Station will be required as a result in the uplift of public transport trips from the development. Minor amendments to cycle parking arrangements and the preparation of travel plans, delivery and servicing plans and construction logistics plans will also need to be secured via condition or S106 agreement.

Local planning authority’s position

The Council are supportive of a housing-led mixed-use redevelopment of this site, but have raised some concerns over the scheme layout, separation distances, architectural design and the Design Code. They are currently considering the detailed merits of the application and are yet to receive all consultation responses.

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 employment, housing, urban design, heritage, inclusive design, climate change, air quality, flood risk, and transport are relevant to this application. The principle of the housing-led mixed-use redevelopment of this site is supported. A number of outstanding concerns are raised with regards to employment, housing, urban design, heritage, inclusive design, climate change, air quality, flood risk and transport:

- **Employment**: the applicant should commit to providing replacement cultural and employment uses, including affordable workspace and shops, in order to comply with London Plan Policies 4.2, 4.6 and 4.9.

- **Housing**: the absence of an affordable housing offer is a significant concern. GLA officers will work with the Council to robustly assess viability with a view to increasing the level of affordable housing, to ensure compliance with London Plan Policy 3.12. The Council should confirm that the housing mix adequately addresses local need to address London Plan Policy 3.8, but concerns are raised in respect of the controls for the outline component mix.

- **Urban design**: the overall masterplan approach is supported, but there are significant concerns in respect of the relationship of some blocks to the public realm, the layout in some areas, the design code and residential quality. Amendments are required in order to ensure compliance with London Plan Policies 3.5, 7.3, 7.5 and 7.7.

- **Heritage**: the applicant should seek to retain the locally listed Gasholder No.7 within the masterplan, if possible, and provide further detail to justify the impact of the tallest building on the Brompton Cemetery, in order to comply with London Plan Policy 7.8.

- **Inclusive design**: the applicant should clarify the location of the wheelchair accessible units in the detailed component and engage with the Strategic Access Panel, in order to comply with London Plan Policies 3.8 and 7.2.

- **Climate change mitigation**: the energy strategy does not fully accord with London Plan Policies 5.2, 5.6 and 5.7. Further information regarding connection to the heat networks, the combined heat and power system and renewable energy is required. The final agreed energy strategy should be appropriately secured by the Council.

- **Air quality**: the applicant should give consideration to relocating the energy centre flue and provide a phased assessment strategy, in order to ensure compliance with London Plan Policy 7.14.

- **Flood risk**: the applicant should give further consideration to basement safety and sustainable drainage measures, in order to ensure compliance with London Plan Policies 5.12 and 5.13.

- **Transport**: in order to ensure that the proposed development complies with London Plan Policies 6.3, 6.5, 6.7, 6.9, 6.10, 6.11, 6.12, 6.13 and 6.14, further information should be provided to assess the potential impact on the highway network and the applicant should seek to reduce car parking. In addition, contributions towards bus services and Imperial Wharf Station will be required as a result in the uplift in public transport trips from the development. Minor amendments to cycle parking arrangements and the preparation of travel plans, delivery and servicing plans and construction logistics plans will also need to be secured via condition or S106 agreement.
for further information, contact GLA Planning Unit (Development & Projects Team):

**Stewart Murray, Assistant Director – Planning**
020 7983 4273  email stewart.murray@london.gov.uk

**Colin Wilson, Senior Manager – Development & Projects**
020 7983 4783  email colin.wilson@london.gov.uk

**Sarah Considine, Strategic Planning Manager (Development Decisions)**
020 7983 5751  email sarah.considine@london.gov.uk

**Nick Ray, Senior Strategic Planner, case officer**
020 7983 4178  email nick.ray@london.gov.uk