Fulham Gasworks

in the London Borough of Hammersmith & Fulham

planning application no. 2018/02100/COMB

Strategic planning application stage 1 referral


The proposal

Hybrid application 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 1 to 37 storeys to provide up to 1,843 residential units (345 of which in full) and a total of 11,309 sq.m. non-residential uses (Use Classes A1 – A4, B1, D1 and D2), public open space, 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 architects are Robin Partington Architects and EPR Architects.

Strategic issues summary

Land use principle: residential-led redevelopment of this disused gas facility is supported, but the applicant should commit to providing replacement creative workspace at affordable levels. (paragraphs 21-28)

Affordable housing: in view of the 50% threshold for industrial sites set out in the Mayor’s Affordable Housing SPG and Draft London Plan Policy H6, the offer of 35%, split 40:60 between rented and intermediate, must be verified as the maximum through a viability assessment. The absence of any affordable housing in Phase 1 is unacceptable. Early and late reviews are expected, and discussions are required to determine appropriate review mechanisms for this long-term, phased development. (paragraphs 31-36)

Urban design: the revised approach to layout and massing is supported and overcomes the majority of design concerns raised with regard to the previous scheme. There are still however concerns over the design code that should be addressed. (paragraphs 38-46)

Heritage: the listed buildings and Gasholder No.2 would be retained and their settings enhanced as part of the scheme and there would be no harm to the setting of other heritage assets. (paragraphs 47-53)

Transport: contributions are required towards bus capacity enhancements and upgrades to Imperial Wharf station. (paragraphs 58-71)

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 of Draft London Plan, for the reasons set out in paragraph 75 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan and Draft London Plan.
Context

1 On 20 June 2018 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 must 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 1B: “Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres”.
- 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 environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 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 6.33 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, 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, although the PRS is in the process of being demolished. Planning permission has been granted for a replacement PRS at the northern end of the site. Planning permission has also been granted for a new permanent depot building for National Grid on the site. A number of the redundant buildings on the site were let on a short term basis to small businesses, including creative businesses and art galleries.

7 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 (now dismantled) was locally listed. Much of the site is also located within Flood Zone 3. The site is located within the South Fulham Riverside Regeneration Area, which is designated in the Council’s Local Plan.
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

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, as well as the breakdown between the detailed and outline components:

<table>
<thead>
<tr>
<th>land use</th>
<th>Use Class</th>
<th>total maximum floorspace (GEA, sq.m.)</th>
<th>detailed component (GEA, sq.m.)</th>
<th>outline component (GEA, sq.m.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>residential</td>
<td>C3</td>
<td>205,046</td>
<td>38,486</td>
<td>166,560</td>
</tr>
<tr>
<td>retail/cafe/restaurant</td>
<td>A1-A4</td>
<td>4,037</td>
<td>982</td>
<td>3,055</td>
</tr>
<tr>
<td>office</td>
<td>B1</td>
<td>3,480</td>
<td>-</td>
<td>3,480</td>
</tr>
<tr>
<td>community/leisure</td>
<td>D1-D2</td>
<td>3,432</td>
<td>3,432</td>
<td>-</td>
</tr>
<tr>
<td>total</td>
<td></td>
<td>216,355</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The residential floorspace equates to a maximum of 1,843 flats, 345 of which would be in the detailed component, which is in the north-eastern corner of the site fronting Michael Road. The retail and office uses are generally located on the ground floor of the blocks.

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 6,795 sq.m. park and a public 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. A maximum ratio of 0.25 spaces per unit is proposed for the scheme as a whole. 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 15 storeys. There will also be three towers of 25, 28 and 37 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.

14 It is proposed that 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.

**Case history**

15 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. Much of this work has taken place, including the dismantling 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. Permission has been granted for a replacement pressure reduction station (PRS), associated structures and compound with access from Gwyn Close.

16 A stand-alone planning permission has also been granted for a new National Grid depot fronting Imperial Road, which formed part of the previous application (ref D&P/3782) but has now been taken out of the application site.

17 On 19 July 2016 the Mayor received documents from the Council notifying him of a planning application of potential strategic importance to redevelop the above site for residential-led mixed-use purposes, to provide up to 1,375 residential units and up to 13,129 sq.m. of non-residential uses (Use Classes A1 - A4, B1, B8, D1 and D2). On 5 September 2016 the Mayor provided his initial comments on the application, supporting the principle of the development, but requesting that affordable workspace be secured; significant design concerns be resolved; that the retention of the locally listed gasholder be explored; and that contributions towards buses and station upgrades be secured. The absence of an affordable housing offer was a significant concern. GLA and TfL officers continued discussions with the applicant and the Council with a view to resolving these matters, but the applicant has chosen to submit a new application. This previous application is still current and is not the subject of any officer recommendation or committee resolution from the Council.

**Strategic planning issues and relevant policies and guidance**

18 The relevant issues and corresponding policies are as follows:

- **Land use principles**
  - London Plan;

- **Housing and affordable housing**
  - London Plan; Housing SPG; Affordable Housing & Viability SPG; Housing Strategy; Providing for Children and Young People’s Play and Informal Recreation SPG; Social Infrastructure 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; London Environment Strategy

- **Transport and parking**
  - London Plan; the Mayor’s Transport Strategy;
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 Local Plan (February 2018) and the 2016 London Plan.

The following are relevant material considerations:

- Draft London Plan (consultation draft December 2017), which should be taken into account on the basis explained in the NPPF.
- Hammersmith & Fulham’s Planning Guidance SPD (February 2018).

**Principle of development**

The site lies within the South Fulham Riverside Regeneration Area, which is identified in the Council’s Local Plan for residential-led development with employment uses, with capacity for 4,000 new homes and 500 new jobs. The Local Plan supports the comprehensive residential-led redevelopment of the site with supporting community facilities and open space.

**Employment and creative uses**

The redundant buildings on the site were occupied for a variety of purposes, primarily as business space for local creative sector firms. These buildings have had to be vacated to enable remediation works to take place and GLA officers have been working with the tenants to find suitable alternative accommodation locally on a temporary basis. Draft London Plan Policy E2 seeks to secure the re-provision of equivalent space in development proposals that lead to a loss and sets out an expectation that proposals for new B1 business floorspace greater than 2,500 sq.m. should consider the scope to provide a proportion of workspace.

Given the established cluster of SMEs in the area, particularly in the fashion and textile sectors, there is the potential for this scheme to contribute to this by providing workspace with the B1 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 through the S106 agreement. Further discussions with GLA planning and culture officers is required to address this issue.

**Open space**

The Council has identified the site as falling within an area that is deficient in public open space and the Local Plan states that a larger park should be delivered on the site. A total of 27,000 sq.m. of publicly accessible open space is proposed, including a 6,795 sq.m. park and a village square. The park is slightly smaller than that proposed in the previous application, but has been designed to be much more usable and animated, with the large areas of water removed and the relationship between the buildings, routes and spaces improved. The proposed open space provision is therefore supported.

**Housing**

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.
The 10 year target is proposed to increase to 16,480 through the Draft London Plan. The Council’s 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 46% of the housing target for the Regeneration Area, is therefore supported.

Retail, leisure and community

London Plan Policy 4.7 requires new out of centre retail development to be subject to an assessment of impact. The Council’s Local Plan seeks to provide new shopping facilities for the day to day needs of residents and workers. A maximum of 4,037 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 3,432 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. Furthermore, the expected trade diversion from nearby centres and parades is not expected to be detrimental to the health of those centres.

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 shops, in line with the requirements of London Plan Policy 4.9 and Draft London Plan Policy E9. 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 and conditions.

Summary

As set out above, given the site’s context within the South Fulham Riverside Regeneration Area and having regard to the London Plan and Draft London Plan, 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 creative space, and controls over retail uses.

Housing

Housing mix

The application proposes up to 1,843 residential units in total, 345 of which are proposed in the detailed component of the application, in Phase 1 of the development. For the overall scheme, a target mix is proposed, with the precise figures for Phase 1 presented below in Table 1:

<table>
<thead>
<tr>
<th>studio</th>
<th>1-bed</th>
<th>2-bed</th>
<th>3-bed</th>
<th>4-bed</th>
</tr>
</thead>
<tbody>
<tr>
<td>percentage of unit type</td>
<td>5-15%</td>
<td>20-35%</td>
<td>40-60%</td>
<td>10-25%</td>
</tr>
<tr>
<td>Phase 1</td>
<td>8.7%</td>
<td>24%</td>
<td>55%</td>
<td>11%</td>
</tr>
<tr>
<td>30 units</td>
<td>84 units</td>
<td>191 units</td>
<td>38 units</td>
<td>2 units</td>
</tr>
</tbody>
</table>

Table 1: proposed housing mix
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, whilst Draft London Plan Policy H12 advises against setting prescriptive dwelling size mix requirements for market and intermediate homes. London Plan Policy 3.11 establishes that strategic priority be afforded to the provision of affordable family homes. GLA officers will seek to ensure that this is reflected in the affordable housing provision.

**Affordable housing**

London Plan Policies 3.11 and 3.12 and Draft London Plan Policies H5 and H6 seek to maximise the delivery of affordable housing, with the Mayor setting a clear strategic target of 50%.

Policy H6 of the Draft London Plan and the Mayor’s Affordable Housing and Viability SPG set out a ‘threshold approach’ whereby schemes meeting or exceeding a specific threshold of affordable housing (in this case 50% on industrial land) by habitable room without public subsidy and which meets other criteria are not required to submit viability information to the GLA, nor would the application be subject to a late stage review mechanism. Draft London Plan Policy H7 and the Mayor’s SPG sets out a preferred tenure split of at least 30% low cost rent (social or affordable rent, significantly less than 80% of market rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the local planning authority.

The application proposes a total of 646 affordable units, which equates to 35% of the scheme by unit and habitable room, with a split of 40/60 between affordable rent and intermediate proposed. Given the outline nature of most of the scheme, the applicant has submitted an indicative schedule of affordable housing, which is summarised below:

<table>
<thead>
<tr>
<th>Number of London Affordable Rent Units</th>
<th>London Affordable Rent (by hab rooms)</th>
<th>London Affordable Rent benchmark £ per week</th>
<th>Number of Affordable Rent Units</th>
<th>Affordable Rent (by hab rooms)</th>
<th>Proposed Affordable Rent £ per week</th>
<th>Affordable Rent % of Market Rent</th>
</tr>
</thead>
<tbody>
<tr>
<td>One-bedroom</td>
<td>-</td>
<td>£144.26</td>
<td>52</td>
<td>104</td>
<td>TBC</td>
<td>TBC</td>
</tr>
<tr>
<td>Two-bedroom</td>
<td>-</td>
<td>£152.73</td>
<td>129</td>
<td>387</td>
<td>TBC</td>
<td>TBC</td>
</tr>
<tr>
<td>Three-bedroom</td>
<td>78</td>
<td>£161.22</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total</td>
<td>78</td>
<td>312</td>
<td>181</td>
<td>491</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>%</td>
<td>12%</td>
<td>19%</td>
<td>28%</td>
<td>29%</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

Table 2: rented tenure indicative mix
<table>
<thead>
<tr>
<th></th>
<th>Number of Shared Ownership Units</th>
<th>Number of London Living Rent (by hab rooms)</th>
<th>London Living Rent Maximum income Threshold £</th>
</tr>
</thead>
<tbody>
<tr>
<td>One-bedroom studio</td>
<td>66</td>
<td>108</td>
<td>£75,000</td>
</tr>
<tr>
<td></td>
<td>43</td>
<td>185</td>
<td>£90,000</td>
</tr>
<tr>
<td>Two-bedroom</td>
<td>31</td>
<td>85</td>
<td>£75,000</td>
</tr>
<tr>
<td></td>
<td>54</td>
<td>255</td>
<td>£90,000</td>
</tr>
<tr>
<td>Total</td>
<td>194</td>
<td>193</td>
<td>£1,295</td>
</tr>
<tr>
<td></td>
<td>443</td>
<td>440</td>
<td>£60,000</td>
</tr>
<tr>
<td>%</td>
<td>30%</td>
<td>30%</td>
<td>£1,439</td>
</tr>
<tr>
<td></td>
<td>26%</td>
<td>26%</td>
<td>£60,000</td>
</tr>
</tbody>
</table>

Table 3: intermediate tenure indicative mix

34 Whilst the tenure split is acceptable, the affordable housing offer does not meet the Fast Track threshold for industrial sites, so GLA officers will work with the Council to robustly interrogate the applicant’s Financial Viability Assessment (FVA) to ensure the maximum level of affordable housing is delivered. Limited detail has been provided regarding the phasing of the affordable provision, although the applicant has advised that the 35% offer is contingent on no affordable housing being provided in Phase 1, owing to the high upfront costs required to bring this site forward. This is unacceptable and the phasing of affordable housing requires further discussion as part of the viability review. Further discussions are also required on affordability, particularly on the affordable rented units that aren’t proposed at LAR benchmarks. The applicant must also explore the use of GLA grant funding to increase provision further and should engage with Registered Providers.

35 The Draft London Plan and the Mayor’s Affordable Housing & Viability SPG set out expectations for viability review mechanisms to be secured through S106 agreements, including early implementation reviews (if an agreed level of progress has not been made within an agreed time after grant of permission), late stage reviews (usually triggered at 75% of private sales) and mid-term reviews for long-term schemes such as this. Further discussions will be required to determine appropriate review mechanisms for this scheme and GLA officers request early engagement into the wording of the draft S106 agreement to ensure that appropriate wording for review mechanisms, as well as obligations around phasing and delivery of affordable housing, are secured.

36 The applicant’s submitted FVA, published on the Council’s website, is a summary version. To enable GLA officers to undertake a robust assessment, the full version should be provided. Furthermore, in line with the transparency provisions set out in paragraphs 1.18-1.25 of the Mayor’s SPG, this must be published in full.

Children’s play space

37 London Plan Policy 3.6 and Draft London Plan Policy S4 seek 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. The application proposes a total of 4,634 sq.m. of play space, which meets the minimum benchmarks for each age groups based on the Mayor’s SPG. The play space would all be located within the landscaped spaces within the scheme, with facilities for younger children in the communal amenity areas and larger play spaces in the public open space. The proposals for play space are supported. The Council should secure details of the on-site play space, and phased delivery, by condition.
Urban design

Density

38  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. Draft London Plan Policy D6 seeks a more design-led approach to density, based on an assessment against the housing standards within Policy D4 and the long-term management proposals for higher density developments.

39  The applicant has calculated the density of the overall proposal to be 291 units per hectare and 839 habitable rooms per hectare, although it is unclear whether these are net density figures, factoring in the proposed ground floor commercial floorspace so this should be clarified. The density would exceed the guidance ranges set out in the London Plan. Noting the varied PTAL across the site, the density would also exceed the threshold for further scrutiny in Draft London Plan Policy D6. It is noted that the highest density elements of the scheme would be located in what is currently the least accessible part of the site, although given that the development proposes to open up the site with accessible walking routes it would be expected that the site-wide PTAL score would increase. Both London Plan and Draft London Plan policy is clear that density ranges should not be applied mechanistically and developments should make efficient use of land to optimise housing delivery. Overall, the proposed density is considered acceptable, given the high quality of design (discussed further below), the site’s characteristics and its capacity to accommodate growth.

Layout and public realm

40  The applicant has engaged positively with GLA officers following the Stage 1 comments relating to the previous application and through pre-application discussions for this proposal. Concerns raised previously in relation to the relationship of the park and the main commercial area and public square in the scheme have been addressed by re-locating the vehicle route through the scheme and providing a larger area of usable public realm, free of vehicles. The pavilion cafe has been removed so the square now relates well to the park. The extension of Block J1 helps to frame and define the public space and the retained listed buildings that sit within it, whilst maintaining clear and legible pedestrian and cycle routes through to the Chelsea Creek development and Imperial Wharf station.

41  The park is now well flanked by strong building frontages and active frontage to the streets and spaces throughout the scheme has improved significantly. The extent of water features has been reduced, which improves the usability of the public open space and the ground level interaction with surrounding buildings. In the detailed element, the open courtyard drop-off space has been removed and decked over to create a podium block, as suggested by GLA officers, which is welcomed.

42  Overall, the amendments to the scheme layout address concerns previously raised by GLA officers and will result in a permeable, legible environment for pedestrians and cyclists, with high quality spaces that feel active and safe to use, which is supported.

Scale and massing, strategic views

43  The scheme proposes three towers of 25, 28 and 37 storeys, which exceeds the maximum height of the previous scheme, although a number of the lower-rise blocks have been reduced in height to assist the transition to the predominantly low-rise context to the north. The Heritage, Townscape and Visual Impact Assessment (HTVIA) demonstrates that the revised massing would improve the impact of the scheme when viewed from the site’s immediate context. The heights of the tall buildings would be greater than other consented tall buildings nearby, including the adjacent Chelsea Creek development and the Lots Road Power Station scheme, but this is a large site that is
capable of accommodating tall buildings. The towers would be set back from the River Thames and would not be as prominent as nearby riverfront development. Furthermore, in response to concerns raised by GLA officers in respect of the previous scheme, the parameters for the towers have been tightened, giving certainty over their slender form, which is important given that these are in the outline element of the application. 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. As such, the scale and massing is considered acceptable, subject to consideration of the impact on the setting of heritage assets, which is undertaken below.

Architectural treatment

44 As with the previous application, 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 buildings would have a ‘lighter’ 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.

Residential quality

45 London Plan Policy 3.5 and draft London Plan Policy D4 promote quality in new housing provision, with further guidance provided by the Mayor’s Housing SPG (2016). In accordance with strategic priorities, it is essential that residential quality is embraced fully, and baseline standards exceeded wherever possible. In relation to the detailed component, all units meet or exceed the relevant space standards, with external amenity provided in the form of balconies and terraces on upper floors. Phase 1 is laid out to meet design guidelines, with no more than eight units per core, generous floor to ceiling heights and single aspect north facing units minimised. The applicant should confirm the PADI zone for the relocated pressure reduction station, to ensure that the separation distances to the proposed residential units adjacent would be adequate.

Design Code

46 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 residential core and individual unit entrances, residential layouts and active frontages. Further discussions are required to ensure that the Design Code incorporates the necessary level of detail and clarity.

Heritage

47 London Plan Policy 7.8 and Draft London Plan Policy HC1 state that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate, and development should be sympathetic to the assets’ significance and appreciation within their surroundings. 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”.

48 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

49 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.

50 As a result of this site coming forward for development, the locally listed Gasholder No.7 has been dismantled, pursuant to a separate planning permission. The NPPF states that “the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application” and take a balanced judgement. In this instance, the dismantled gasholder is in storage and its permanent retention as part of the scheme will be explored in response to a requirement of the S106 agreement pursuant the planning permission permitting its demolition. It is understood that some elements of the gasholder frame will be incorporated into the landscaping proposals for the scheme and this is welcomed.

Setting of off-site heritage assets

51 The proposal has the potential for visual impact on the settings of other nearby conservation areas and listed buildings. The applicant’s HTVIA sets out a number of proposed views showing the potential impact the development would have on nearby heritage assets. In particular, the Imperial Square & Gasworks, 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.

52 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 and large 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.

53 The three towers 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 under construction. The consented Stamford Bridge Stadium (Chelsea Football Club) development is also visible. In the majority of views looking south along the axial route the proposed tower would rise above the listed colonnade and/or individual monuments. As part of the Stage 1 comments relating to the previous scheme, GLA officers raised concerns over the bulky silhouette of the towers and this has been addressed by tightening up the parameters to ensure slender buildings with steps in height and clear breaks between them. The Design Code and illustrative views demonstrate that the architectural quality and use of materials will ensure that the towers will be read as distinct, distant elements above the colonnade. The development would not attract from the viewers ability to appreciate the landscape arrangement and architectural quality of the Cemetery. GLA officers consider that there would be no harm to the setting of Brompton Cemetery, or the listed structures within it.

**Inclusive design**

54 In accordance with London Plan Policy 3.8 and Draft London Plan Policy D5, all of the residential units will meet Building Regulation M4(2) standards and 10% of the units will be designed to be fully adaptable and adjustable to wheelchair users (M4(3) standards). The Design & Access Statement for the detailed component specifies where the accessible units will be located and confirms that a variety of unit sizes will be provided to enable choice for disabled people. 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.

55 Furthermore, the applicant has previously engaged with the GLA’s Inclusive Design & Access Panel (IDAP) to gain disabled users input on the proposals. In response to comments received, the applicant has amended the public realm design to provide clear separation between the vehicle through route and the pedestrianised areas, as well as introducing bends in the road to reduce traffic speeds. This is welcomed. The majority of the public realm design is in the outline component of the development which would be subject to detailed reserved matters approvals. The Council is encouraged to undertake a detailed review of the accessible and inclusive design at that stage, utilising either the GLA’s IDAP or a local alternative.

**Climate change**

56 Through a range of proposed passive design measures and Combined Heat and Power (CHP), the residential development would achieve an overall carbon dioxide saving of 42% compared to a 2013 baseline. These savings exceed the on-site target set within Policy 5.2 of the London Plan. Once all opportunities to minimise on-site carbon emissions have been robustly investigated, including photovoltaic panels, the applicant should ensure that the remaining regulated CO2 emissions is met through a contribution to the borough’s offset fund, in order to meet the zero-carbon target for residential development and draft London Plan Policy SI 2. The commercial development would achieve an overall carbon dioxide saving of 36% compared to a 2013 baseline, exceeding the 35% target within Policy 5.2 of the London Plan. Further technical information is required to verify the proposed carbon emissions savings, full details of which have been sent to the applicant and Council.

**Flood risk**

57 The applicant must have regard to sewer flood risks and emergency measures in the case of a breach of River Thames tidal defences. A thorough review of flood risk (including residual risks) from all sources of flooding should be provided, and flood resilience and emergency planning measures should be included to manage these risks in order to comply with London Plan Policy 5.12 and Draft London Plan policy SI12. The surface water drainage strategy should make much greater use of opportunities identified in the landscape strategy, and have regard to the drainage hierarchy, discharge rate,
potential flood risks arising from the pumped drainage strategy in order to comply with London Plan Policy 5.13 and Draft London Plan policy SI13. The agreed strategy should be secured by condition, along with measures to encourage water harvesting and reuse to reduce consumption of water across the development. This can be integrated with the surface water drainage system to provide a dual benefit.

**Transport**

**Car parking**

58 The proposal includes residential car parking provision at a ratio of 0.25 spaces per unit; this equates to approximately 475 spaces, which is below the maximum standards set out in the South Fulham Riverside Regeneration Area (SFRRA) SPD of 0.5, and is within the Draft London Plan maximum standards. This is therefore acceptable. Of all of the residential parking, 10% will be blue badge spaces; an additional 3 spaces will also be provided the non-residential element of the detailed application to accommodate any disabled staff members. A total of 8 basement car club spaces will also be provided once the development is completed. There will be 6 visitor spaces (including 2 blue badge spaces) provided at grade in the public realm for short stay. General visitor spaces generate traffic and are contrary to current and Draft London Plan policy, and should be removed from the proposal.

**Trip generation and mode share**

59 In line with London Plan Policy 6.3 and Policy T4 of the Draft London Plan, a trip generation and mode share assessment has been submitted. The methodology of assessment is accepted, which is based on previous works for the 2016 application and prorated up to reflect the increase in quantum with further adjustment to reflect an overall reduction of parking. The overall proposal will generate a total of 1229 two way persons trip in the AM peak and 957 in the PM peak. Of all of the trips, 62 vehicular trips will be generated in the AM and 69 for the PM. This is considered acceptable. The applicant shall however clarify whether the estimated walking trips have included linked trip to public transport in the vicinity of the site.

**Highway impact and proposals**

60 The TA predicts a net reduction in traffic movements from the proposal to the surrounding highway network compared with previous gas works operation; however clarification is sought to address issues on flows and vehicular trip distribution for the local highway network.

61 As per the 2016 proposal, the applicant is proposing 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. Concerns remain on the proposed Kings Road crossing in terms of location as well as its design, this will need to be assessed through Stage 1 Road Safety Audit. Demand of the proposed crossing facility is also needed to be assessed.

62 The latest proposal includes the revised internal link road through the site between the Sands End Lane site access and the proposed access off Imperial Road south of Fulmead Street has been proposed to allow through traffic movements. The latest design is intended so that it will not draw new trips through the site or increase flows on the network and is therefore supported.
Public transport impact

63 In line with London Plan Policy 6.2 and Policy T3 of the Draft London Plan, TfL and Network Rail have already identified and submitted evidence to support a requirement for funding for increased staircase capacity at Imperial Wharf Station. This is to accommodate the expected significant increase in demand of train services; 213 two-way trips in AM and 170 in the PM peaks from the proposal, which compares to 175 AM and 140 PM trips for the 2016 proposal. A proposal to provide additional staircase capacity to the northbound platform has been developed by TfL and it is currently estimated at a cost of £1.85m in the latest review. The index-linked amount should be secured in the S106 agreement towards the delivery of the project. Failure to deliver the required mitigation would lead to an unacceptable level of crowding at the station which would result in temporary station closure during peak times, leading to very poor passenger journey experience, which would not be acceptable.

64 The latest proposal will generate a total of 192 (compared to 160 in the 2016 proposal) bus trips in the AM peak busiest hour. It is considered that the proposal would cause capacity issues to existing bus service on Imperial Road, in particular the route which provides direct connection to Fulham Broadway Station. In order to mitigate the impact, a financial contribution of no less than £187,500 (index linked), which equates to £37,500 per year for five years, should therefore be secured.

Walking and cycling

65 Both PERS and CLOS audits were undertaken during the previous application process. The studies concluded that the walking environment in the vicinity of the site is of good quality in general; however there is also scope for further improvements at certain locations where footway quality is poor as well as those with limited footway width due to obstruction. The Council should therefore secure a package of walking/cycling improvements from the developer through the S106 agreement.

66 The proposal includes 3,583 long stay and 292 short stay cycle parking spaces based on the current proposed quantum of the development. This meets the current and Draft London Plan cycle parking standards and is therefore welcomed, as is the applicant’s commitment to provide a shared pedestrian/cycle connection to the site boundary adjacent to the rail line, which would facilitate the provision of a cycle link under the rail line to Lots Road in the future.

67 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 proposed location for the re-located docking station is to be agreed. A condition or planning obligation must be imposed requiring the applicant to provide a like for like replacement facility and be fully operational before the existing facility is closed. This is in line with London Plan Policy 6.2 and Policy T3 of the Draft London Plan.

Servicing and construction

68 It is proposed that general servicing will be carried out at the basement servicing area with the exception of the convenience store, refuse collection and postal delivery; this is considered acceptable. The submission of a framework delivery and servicing plan (DSP) for the proposal is welcomed, which includes a strategy to regulate and manage servicing and delivery activities within the site. The final implementation of the DSP should be secured by condition.

69 In line with London Plan Policy 6.14, and T7 of the Draft London Plan, a draft construction logistics plan (CLP) has been submitted. However, few details have been provided to allow an assessment of construction traffic impact arising from the proposal and so to identify the need and
extent of mitigation measures required. The applicant should provide as much detail as it possibly can prior to determination; and the submission, approval and implementation of the finalised CLP should be secured by S106 agreement.

Travel plan

70 The submitted framework travel plan covering both the residential and workplace elements of the proposal has been submitted. The travel plans have yet to include any baseline and future targets of mode shift to sustainable travel modes, all of these need to be provided prior to Stage 2 referral to the Mayor. Additional measures are recommended to further promote cycling. In any case the submission, approval and implementation of the final travel plan should be secured by S106 agreement, in line with London Plan Policy 6.3 and T4 of the Draft London Plan.

Transport conclusion

71 In summary, the proposal does not fully comply with the London Plan and Draft London Plan policies, the applicant must address issues raised including car parking, trip rate, review of local highway proposals, public transport, cycle hire, construction and travel plan to make the proposal fully acceptable. Contributions to mitigate the impacts of the development on buses and Imperial Wharf station are also required.

Local planning authority’s position

72 The Council are supportive of the application, subject to securing the maximum level of affordable housing. The application is expected to be reported to committee in October.

Legal considerations

73 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

74 There are no financial considerations at this stage.

Conclusion

75 London Plan policies on land use, housing, urban design, heritage, inclusive design, climate change, 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 land use, affordable housing, urban design, climate change, flood risk and transport:

- **Land use principle:** residential-led redevelopment of this disused gas facility is supported, but the applicant should commit to providing replacement creative workspace at affordable levels, in line with London Plan Policy 4.1 and Draft London Plan Policy E2.
• **Affordable housing:** the offer of 35%, split 40:60 between rented and intermediate, is broadly welcomed but in view of the 50% threshold for industrial sites set out in the Mayor’s Affordable Housing SPG and Draft London Plan Policy H6 this must be verified as the maximum through a viability assessment. The absence of any affordable housing in Phase 1 is unacceptable. Discussions are required to determine appropriate review mechanisms for this long-term, phased development, in accordance with London Plan Policies 3.11 and 3.12, Draft London Plan Policies H5 and H6 and the Mayor’s Affordable Housing & Viability SPG.

• **Urban design:** the revised approach to layout and massing is supported and overcomes the majority of design concerns raised with regard to the previous scheme. There are still however concerns over the design code that should be addressed, in order to comply with London Plan Policies 3.5, 7.1, 7.3 and 7.5, Draft London D1, D4 and D7.

• **Climate change:** the energy strategy does not fully accord with London Plan and Draft London Plan Policies. Further information regarding overheating, the heat network, the combined heat and power system and renewable energy is required. The final agreed energy strategy should be appropriately secured by the Council.

• **Flood risk:** the applicant should address concerns over flood risk and surface water drainage, in order to ensure compliance with London Plan Policies 5.12 and 5.13, and Draft London Plan Policies SI12 and SI13.

• **Transport:** the proposal does not comply with London Plan Policies 6.3, 6.7, 6.9, 6.10, 6.13 and 6.14; and Draft London Plan Policies T2, T3, T4, T5, T6, T7 and T9. The applicant must address issues raised including car parking, trip rate, review of local highway proposals, public transport, cycle hire, construction and travel plan to make the proposal fully acceptable. Contributions to mitigate the impacts of the development on buses and Imperial Wharf station are also required.

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