

**ROYAL BOROUGH OF KENSINGTON AND CHELSEA
REPORT BY EXECUTIVE DIRECTOR,
PLANNING AND BOROUGH DEVELOPMENT**

**APP NO. OB/12/00301/Q27
PLANNING APPLICATIONS COMMITTEE 03/04/2012
AGENDA ITEM NO. STR4**

SITE ADDRESS

**Woodlands
80 Wood Lane
LONDON
W12 0TT**

**APPLICATION
DATED**

27/01/2012

**APPLICATION
COMPLETE**

31/01/2012

APPLICANT/AGENT ADDRESS

**Mr J McNally
London Borough of Hammersmith and Fulham
Development Management Services
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**LISTED
BUILDING**

**CONS.
AREA**

N/A

**WARD Outside
Borough**

CAPS No

**ENGLISH
HERITAGE**

N/A

ART '4' No

**CONSULTED
1750**

**OBJECTIONS
0**

**SUPPORT
0**

**PETITION
0**

**COMMENTS
14**

Applicant

London Borough of Hammersmith and Fulham

PROPOSAL: This Council is asked for its observations on a hybrid application (part detailed/part outline) received by Hammersmith & Fulham Council for the Imperial West (Woodlands) site comprising detailed application for 3 buildings: (1) academic building (9 storeys/23,077m² GEA) (Class D1) including health research, day nursery (1,029sqm GIA) (Class D1) and restaurant facilities (2,127sqm GIA) (Class A3); (2) office and research units (part 6, part 12 storeys/22,528m² GEA) (Class B1) of which 77sqm (GIA) Class A1/A3 and 313sqm (GIA) Class A3; and (3) residential tower (Class C3) (35 storeys/20,297m² GEA) of floorspace in total, 192 units (59 of which are key worker units) and 319sqm (GIA) of A1/A3 floorspace at ground floor level; along with an access road, car/cycle parking (part basement and part surface), ancillary plant and landscaping; Outline application for erection of 3 additional buildings comprising a hotel (13 storeys/maximum 14,500m² GEA) (Class C1) including 1,080sqm (GIA) restaurant (Class A1/A3) and 850sqm (GIA) fitness centre (Class D2); 2 further buildings to be used for education (7 storeys/maximum 6,500m² GEA) (Class D1) of which 600 (GIA) Class A1/A3; office (Class B1) and administrative uses (Part 3, part 5 storeys/maximum 5,900m² GEA); demolition of existing sports hall building (Class D1) and existing office (Class B1). (GEA - Gross External Area; GIA - Gross Internal Area). (This application constitutes Environment Impact Assessment Development).

RBK&C Drawing No(s):OB/12/00301

Applicant's Drawing No(s): 20804-01-AR-07-097-C, 098-A, 099-A, 100-C, 112-B, 120, 121, 122, 123, 124, 125, 126, 127; 107896L017D; 20702-01-AR-07-099-D, 100-C, 101-C, 102-C, 103-C, 104-C, 105-C, 106-C, 107-C, 108-C, 109-C, 110-C, 111-C, 112-C, 113-C, 114-C, 115-C, 116-C, 117-C; 1105-A-099-D, 100-D, 101-D, 102-D, 103-D, 104-D, 105-D, 106-D, 107-D, 108-D, 109-D, 110-D, 111-D, 112-D, 113-D; 1105-A-210-001-D, 002-D, 003-D, 004-D, 005-D; 1105-A-310-001-D, 002-D, 003-D, 004-D; 1105-A-099-F, 100-F, 100M-F, 101-F, 102-F, 103-F, 104-F, 105-F, 106-F, 107-F, 108-F, 109-F, 110-F, 111-F, 112-F, 113-F, 114-F, 115-F, 116-F, 117-F, 118-F, 119-F, 120-F, 121-F, 122-F, 123-F, 124-F, 125-F, 126-F, 127-F, 128-F, 129-F, 130-F, 131-F, 132-F, 133-F, 134-F, 135-F, 136-F; 1105-A-210-0010F, 002-F, 003-F, 004-F; 1105-A-310-001-F, 002-F, 003-F; 1105-A-510-001-F, 002-F, 003-F, 004-F, 010-F, 011-F

RECOMMENDED DECISION: Raise Objection

OBJECTIONS

- 1. The height, bulk and design of Buildings B, D and F, would harm views from within and the setting of the Oxford Gardens/St Quintin, Ladbroke and Kensal Green Cemetery Conservation Areas together with the setting of the registered park at Kensal Green Cemetery . Therefore, the proposal is contrary to Core Strategy policies CO5, CR5, CL1 and CL2, saved UDP policy CD16 in the UDP, policies 7.4, 7.6 and 7.7 of the London Plan 2011.**
- 2. The absence of an east-west pedestrian link from the south east corner of the site underneath the West London Line, and not including land immediately adjacent to the south of the link, means the proposal would not successfully integrate with its surroundings or provide the pedestrian connectivity improvements identified in the Draft White City Opportunity Area Planning Framework. The proposal is contrary to policies CT1 and CL1 in the Core Strategy, Policies 6.1 and 6.10 in the London Plan 2011, and the guidance contained within the Draft White City Opportunity Area Planning Framework.**
- 3. In the absence of assessment of the cumulative impact of developments within the White City Opportunity Area the potential impact on traffic congestion and public transport in the Royal Borough cannot be accurately assessed. The proposals fail to demonstrate compliance with Policies CT1 and CT2 in the Core Strategy and Policies 6.1 and 6.2 in the London Plan 2011.**
- 4. In the absence of detailed information submitted with the proposal in respect of mitigation measures for the potential impact on social infrastructure (particularly with regard to health and education facilities) within the Royal Borough, the proposal fails to demonstrate compliance with Policy C1 of the Core Strategy and Policy 3.18 of the London Plan 2011**

INFORMATIVES

- 1 In the absence of the detailed information submitted with the proposal, concern is raised regarding the impact of the proposal on air quality in the Royal Borough
- 2 The Royal Borough raises concerns that no analysis has been undertaken of the impact of the construction noise on residential properties located on the west side of Latimer Road. Given their proximity to the development site it is considered that this analysis should be undertaken as part of the proposal.

1.0 SITE AND SURROUNDINGS

- 1.1 The site is situated in the London Borough of Hammersmith and Fulham. It is 2.27ha and is bounded by the A40 (Westway) to the south, Wood Lane to the west, Shinfield Street to the north and the West London Railway Line to the east.
- 1.2 The site is largely vacant, except for the former BBC buildings to the south east of the site. These are 28,000 sq m (GEA) and range from two to four storeys. The BBC's occupation ended in September 2008. Vehicular access is provided from Wood Lane.
- 1.3 Outside the red line to the north, but within the wider masterplan site area, a permitted scheme for 606 postgraduate units and 9 units for Imperial College London (ICL) key workers is under construction and due for completion towards the end of 2012. Please see the Planning History section for further details.
- 1.4 To the west lies a mix of uses, including Hammersmith Hospital, Wormwood Scrubs Prison, the Linford Christie Stadium and Latymer High School sports grounds. Immediately to the south lies the Westway and then a strip of former industrial land and further south the BBC Media Village and BBC Television Centre. To the north lie residential terrace buildings. To the immediate east is an embankment and railway lines, with industrial properties along Latimer Road located on the other side of the railway.
- 1.5 Further to the east is the Oxford Gardens/St Quintin Conservation Area which is predominantly residential in character. The urban layout comprises long straight parallel roads extending from Ladbrooke Grove westwards via St Marks Road into the southwest corner of the former St Quintin Estate, resulting in vistas towards the development site. Housing to the east of St Helen's/St Quintin Road generally comprises detached or paired villas on four floors including basement, dating from mid and late Victorian periods. The grid of streets to the west comprises two-storey, red-brick Edwardian terraced housing.
- 1.6 The site is within the White City Opportunity Area (WCOA) as designated within the London Plan. It does not benefit from any other site specific policy designations.

2.0 PROPOSAL

- 2.1 The London Borough of Hammersmith and Fulham has requested the comments of the Royal Borough on a hybrid application:

"comprising detailed application for 3 buildings: (1) academic building (9 storeys/23,077m² GEA) (Class D1) including health research, day nursery (1,029sqm GIA) (Class D1) and restaurant facilities (2,127sqm GIA) (Class A3); (2) office and

research units (part 6, part 12 storeys/22,528m² GEA) (Class B1) of which 77sqm (GIA) Class A1/A3 and 313sqm (GIA) Class A3; and (3) residential tower (Class C3) (35 storeys/20,297m² GEA) of floorspace in total, 192 units (59 of which are key worker units) and 319sqm (GIA) of A1/A3 floorspace at ground floor level; along with an access road, car/cycle parking (part basement and part surface), ancillary plant and landscaping; Outline application for erection of 3 additional buildings comprising a hotel (13 storeys/maximum 14,500m² GEA) (Class C1) including 1,080sqm (GIA) restaurant (Class A1/A3) and 850sqm (GIA) fitness centre (Class D2); 2 further buildings to be used for education (7 storeys/maximum 6,500m² GEA) (Class D1) of which 600 (GIA) Class A1/A3; office (Class B1) and administrative uses (Part 3, part 5 storeys/maximum 5,900m² GEA); demolition of existing sports hall building (Class D1) and existing office (Class B1). (GEA - Gross External Area; GIA - Gross Internal Area).

- 2.2 The proposals are for seven buildings, ranging from 3 to 35 storeys.
- 2.3 Buildings C, D and F are being applied for in detail. These are the two buildings nearest RBKC to the east of the site and the residential tower building, which is located to the south west corner of the site. Buildings C would provide biomedical and health research facilities, an educational faculty and a day nursery and health centre, and would be 9 storeys. Building D would provide office floorspace partly for lease on the open market and partly as 'incubator' office space for start-up businesses emanating from ICL research, and would range from 6 to 12 storeys. Building F would be the residential tower and would be 35 storeys.
- 2.4 Buildings A, E and G are being applied for in outline with details of layout, height, storeys, floorspace, use being submitted as part of the current proposal with detailed design as a reserved matter. Building A would be used as offices, at part 3, part 5 storeys. Building E would be used as a hotel, at 13 storeys. Building G would be used for offices, at 7 storeys.
- 2.5 The ground floor uses provide a range of 'active' uses including restaurants, cafes, retail, a day nursery and a fitness centre.
- 2.6 The total floorspace is 94,089 sq m. The wider masterplan site includes a further 20,262 sq m in the approved and under construction postgraduate accommodation.
- 2.7 The buildings are arranged around a large central courtyard. They step up in height towards the south.
- 2.8 Parking is to be provided at basement level, with parking for the disabled at grade, for 239 spaces, and over 900 cycle parking spaces are also provided throughout the site.

2.9 Access is to be from Wood Lane. This will continue south under the Westway, if a development site to the south of the Westway known as Helical Bar comes forward.

3.0 RELEVANT PLANNING HISTORY

3.1 The north eastern corner of the site is subject to a recent approval in November 2010 (ref. 2010/02218/FUL) for 606 postgraduate units and 9 units for ICL key workers. This is under construction and due for completion towards the end of 2012. These are the buildings located to the north east of the site and comprise the first phase of the development proposals. They range from 3 to 10 storeys, rising in height moving southwards.

3.2 This area is not within the red line of the current proposals. However, they are part of the same masterplan site and are under the ownership of the applicant.

4.0 PLANNING CONSIDERATIONS

4.1 The main considerations from the perspective of the Royal Borough are:

- The impact of the development on the surrounding townscape, in particular on setting of any listed buildings, conservation areas and on views from within the Royal Borough
- The impact on connectivity to the Royal Borough
- The impact on traffic and public transport networks in the Royal Borough as a result of the proposed floorspace and pedestrian links between the site and the Royal Borough
- The impact on the socio-economic infrastructure of the Royal Borough
- The environmental impacts on the Royal Borough, including air quality, drainage and flooding, ecology, land contamination, noise and vibration

4.2 For the purposes of S38 (6) of the Planning and Compulsory Purchase Act 2004, the 'Development Plan' comprises the London Plan 2011, the Core Strategy as adopted 08 December 2010, and the relevant 'saved' policies from the Unitary Development Plan 2002, (as amended in September 2007). Various supplementary planning documents are also relevant to the proposals. The relevant policies are attached to this report.

Impact on townscape

Masterplan

4.3 The masterplan is for a collection of buildings arranged around a central public space. The central space has contemporary landscaping and is conceived as partly green open space and partly a plaza, where any surrounding ground floor uses could

spill out. The buildings are large and singular in terms of their architectural treatment and how they sit within their plots. There is little coherence and coordination of how the different buildings address and enclose the central area. The sense of place has a corporate, central London feel rather than that of a university campus, and is at odds with the wider West London suburban context.

Building C - School of Public Health

- 4.4 The focus of the new campus is the new School for Public Health (Building C), which forms the east side of the central square and backs onto the railway and the borough boundary. The building is part 9/10 storeys, which with generous floor to floor heights, results in the building being overall some 40m above grade. The large footprint generates a bulky building, though this is not unexpected for a major institutional building. The massing has been eased by fragmenting the floorplan around the central atrium and creating a staggered built form. The front and rear building facades are articulated and the floorplates are set back on several floors, but also cantilever to the northern elevation. The east-west orientation of the building presents the more articulated elevations towards both the central square and the Royal Borough, though the front elevation benefits from the full height central atrium. The material finish is reconstituted stone arranged in large panels with large punched window openings, contrasting with the predominantly curtain wall glazing with veil patterning on the side facades.
- 4.5 The design works hard to break down the massing of a bulky institutional building and provide a distinctive and interesting appearance. The architecture is engaging and high quality, addressing the central square well. It is disappointing that the articulation is more muted and the central atrium is not carried through the full depth and height of the building to give greater expression on the rear elevation, which would have improved the appearance of the east-facing facade and a better building in the round.
- 4.6 In terms of townscape impacts, the submission provides summer views with trees in full leaf and no winter views, making any full analysis difficult. Nevertheless, Building C can be seen to rise above the low-level industrial units in Latimer Road (views 15 and 19) and rooflines of Kelfield Gardens (view 14) and Oxford Gardens (view 3), but for the most part is obscured by the residential buildings in the foreground. Its white stone and glass finish will be more distinctive in middle distance views, contrasting with the red-brick townscape of the Oxford Gardens area. At greater distance, the building sits just above the roofline of the former Princess Louise Hospital in the view from Kensington Memorial Park (view 27); but is potentially more noticeable above the treeline in the view out of Kensal Green Cemetery (view 9). From here the building presents its full scale

in silhouette.

- 4.7 On the whole the scale and townscape impacts of Building C are to be expected, given that it is an institutional building of public interest. Its scale is such that the building has a presence in the local townscape, but not so as to appear dominant or disruptive to the street scenes, or to detract from the informal, mature landscaping of Kensal Green Cemetery. The building, with its distinct architectural treatment and public function, works well a district landmark.

Building D - Technology Transfer Building

- 4.8 Building D is located in the southeast corner of the site, flanked by the School of Public Health and the elevated Westway. It is referred to as the 'Technology Transfer Building'; housing start-up businesses that may stem from research programmes at Imperial College, but doubles as a commercial office building. The extent of incubator and general offices is not specified, though in terms of architecture, the building reads as a flexible office block that is arranged in 3 parts; a dominant 12-storey slab block rising some 35-40m above the adjacent Westway and its slip-road; a smaller 6-storey wedge-shaped block facing the School of Public Health; and an intervening 6-storey atrium that presents the building's main entrance on a diagonal towards the central square. A further visitor entrance and a servicing entrance, are provided on the southern elevation, fronting onto a replacement highway that runs below the Westway and could connect through to the Royal Borough as a subway link for pedestrians and cyclists.

- 4.9 The southern elevation onto the Westway comprises terracotta frames and large recessed window openings. The frame is stretched over the 3 uppermost storeys to create a top to the building, whilst the base is defined by double-height 'V' shaped concrete columns and recessed curtain walling. The framed structure is carried round onto the flank elevations, though a more solid appearance is achieved with terracotta infill panels replacing much of the glazed openings. By contrast the inner face of the tall slab block comprises a concrete diagrid structure visible behind curtain glazing, and is seen through and above the central atrium. The design of the lower wing (north elevation) is similar, but has a finer fine grained appearance, with slender piers and off-set openings adding a richness to the elevation.

- 4.10 The east-west orientation of Building D presents the building more end-on towards the Royal Borough, easing its visual impact. The different heights and architectural treatments of the accommodation wings and interconnecting section/atrium break up the appearance of the rear facade, alleviating the sense of bulk from this perspective. However, the building's overall height remains problematic, with the 12-storey wing rising significantly above the roofscape when viewed from Oxford Gardens (view 4,

especially in winter) and Kensington Memorial Park (view 27); prominent in views along Highlever Road (view 13) and Freston Road (view 24); and visible, albeit marginally, above the roofscape in Kelfield Gardens (view 20). The view from Latimer Road (view 20) has the Public School of Health lost against the taller and bulkier backdrop of block D. The taller slab is especially prominent when seen from Kensal Green Cemetery, rising distinctly above the perimeter landscaping and the proposed School of Public Health.

- 4.11 On the whole the architecture and material choice is high quality. However, there is little sense of being a campus building that supports the School of Public Health; but more the sense of commercial offices that are better suited to central London. This relates in part to the singular architectural treatment, but more to the scale of the building; which at 50m above grade makes the building a district landmark structure in its own right, but also 10m taller than the more important Public School of Health. The 12-storey slab block relies on its location adjacent to the Westway and the proposed tower block for its justification. However, a much lower building would work equally well in fronting the Westway, whilst supporting the predominance of the Public School of Health and easing the townscape impacts. As it is, Building D visually harms the local townscape within the Oxford Gardens area and harmfully impacts upon the setting and view out of Kensal Green Cemetery.

Building F - Residential

- 4.12 Detailed proposals are included for a new residential tower Building F, which is positioned in the southwest corner of the site, adjacent to the Westway and away from the borough boundary. The tower is 35 storeys (112m) and has a tapering built form, which rises to the building's core on the west. The footprint is twisted at a 45 degree angle to the Westway, which effectively presents the building's end elevation and entrance towards the central square. The elevation itself is conceived as stepped terraces of winter gardens with louvred glazing, regarded as offering a lighter appearance in views from the Royal Borough. By contrast the flank elevations are clad in terracotta panels with mortared joints, with full height French windows off-set between floors, giving a chequered pattern and emphasis to its tapered building edge. The terracotta finish is interrupted by fully glazed curtain walling at ground floor and at nine storey intervals, adding articulation to the elevations. The glazed core to the rear creates a strong vertical emphasis to the building when seen in long views from southern and western perspectives, and is positioned to mark the intersection between Wood Lane and the Westway.

- 4.13 At present the draft OAPF refers to the opportunity for high-rise buildings of between 20-30 storeys (up to 100m) being appropriate along the Westway at the gateway to central London. The document remains in draft and the Council strongly objected to the inclusion of tall buildings; nonetheless, the proposed tower is contrary to the current guidance (para 4.4.2).
- 4.14 In this instance, it is difficult to read the site as a 'gateway' to central London, given the intervening suburban character of northwest Kensington. It is accepted that this is junction for accessing Wood Lane, though this is at most of district importance and not metropolitan. Similarly, there is merit in landmarking a university. However, this is a satellite campus and the tower has no obvious relationship to Imperial College other than proximity: it does not contain any educational or academic functions or celebrate the university through its architecture. There are tall buildings within the wider area. However, at 35 storeys the current proposal is considerably taller than the nearest towers of the Silchester Estate (21-23 storeys) and Edward Woods Estate (24-25 storeys).
- 4.15 Regarding the tower's appearance, its asymmetric shape does allow the building to read as a well-proportioned, slender tower when seen head on; though when seen in the round the wedge-shaped flank elevations are less successful in disguising the extent of residential content. The articulated elevations and winter gardens provide design interest and material quality, though the glazing is unlikely to give the transparent material treatment envisaged or alleviate the monumental scale of the building. The termination of the building is decent, but not especially engaging. In all the design is good and generally well detailed, and may well work as part of a cluster as found in central London. However, it lacks the outstanding quality and silhouette required of a stand-alone building of this scale.
- 4.16 Regarding the visual impacts, given the mainly low-rise scale of the adjoining northwest Kensington, the tower significantly impacts upon the local townscape, despite the positioning at the rear of the site and the angled footprint. The tower rises discordantly above the regular pitched rooflines in Kelfield Gardens (views 14, 17 and 20) and Highlever Road (views 18 and 21) and treelines of Oxford Gardens (views 3 and 4) and Cambridge Gardens (view 28), jarring with and in instances overwhelming the domestic scale and architecture; disrupting the suburban setting of the conservation area. Longer distance, the tower intrudes upon the highly sensitive vista along Rosmead Road in the Ladbrooke Conservation Area (view 26), the leafy backdrop to Avondale Park (view 25) and open skyline of Kensington Memorial Park (view 27). It is an especially disruptive feature in the backdrop to Kensal Green Cemetery (view 9), where it becomes an isolated tower and the broader wedge-shaped silhouette dominates the skyline, harming the setting of the conservation area and registered garden.

Outline elements

- 4.17 Building E is in outline only, but is intended as a hotel with a conference facility. The proposed access points to the building are welcome, helping to activate both the central square and importantly the new highway to the rear that could form part of the new access route through to the Royal Borough. In terms of alignment and overall scale of the building, the block is similar to the adjacent taller slab block of the incubator/commercial office Building D and looks to respond to the Westway. As such, it is generally obscured by the intervening Building D in views from the Oxford Gardens area. However, from Kensal Green Cemetery the building is seen side on and overlaps with the silhouette of Building D, adding to the visual urban intrusion and its harmful impact. Buildings A and G, which are also in outline, are by comparison relatively low-rise and sit comfortably within the local townscape in views from Kelfield Gardens (view #20) and has little impact above the treeline in views from Kensal Green Cemetery (view 9).

Conclusion

- 4.18 Objection is raised to the scheme on design grounds. Buildings B, D and F constitute unattractive tall and bulky buildings that do not integrate with the local townscape and detract from the local skyline as viewed from the Royal Borough. The buildings harm views out of the Oxford Gardens/St Quintin, Ladbroke and Kensal Green Cemetery conservation areas and the setting of a registered park. The proposed residential tower (Building F) is of unwarranted metropolitan scale and visual impact and is not of exceptional design quality. As such the proposals do not accord with Policies CO5, CL1 and CL2(h-l) in the Core Strategy, Saved UDP Policies CD16 and CD6; London Plan Policies 7.4, 7.6 and 7.7.

East-west connectivity

East-west pedestrian link

- 4.19 The proposed layout of the site provides space for an east-west pedestrian link to be provided just north of the A40. However, the link itself is not provided.
- 4.20 The link is included within the Draft White City Opportunity Area Planning Framework (WCOAPF) and is considered essential to address the physical barriers that exist between White City and the Royal Borough. There are no crossings of the West London Railway Line for a distance of approximately a mile between Hunt Close and North Pole Road. The bus and underground station at White City are inaccessible to those situated on the east side of the railway tracks. This part of the Royal Borough has poor public transport accessibility (PTAL=2). The provision of an east-west pedestrian connection would increase the PTAL at the Westway Sports centre from 2 (poor) to 4 (good).

- 4.21 The draft WCOAPF identifies additional pedestrian and cycling links to the Royal Borough as being a necessary mitigation measure to limit the impact of development within the opportunity area on the highway. It is considered that the link should be delivered early in the lifetime of the WCOAPF and that it should be delivered by the Imperial development as a part of their contribution to deliver required infrastructure in the opportunity area. The fact that the applicant's landownership does not cross the railway line should not be an impediment as the landowner on the east side of the railway line, the Westway Development Trust, is fully supportive of the link.
- 4.22 In addition to the principle of non-provision of the link, concerns are also raised regarding the treatment of the land adjacent to the link. The area set aside for the link in the landscaping allows for a link of c.15m wide. This width should give it sufficient open aspect between the imposing structures on either side to make it attractive to use. However, the area to the south of the link entrance is not within the red line of the application site, and therefore no control is retained on how this area would be treated. This is a crucial failing of the proposals, as high quality spaces must be provided on either side of the link's entrances in order to make the pedestrian link as attractive as possible.
- 4.23 It is very disappointing that the application site has not been extended to incorporate the east-west link itself and the land to the south of the link. In the absence of a clear reason why the applicant cannot deliver the link as part of their development, the proposals are considered to be contrary to the Draft WCOAPF, Policies CT1(g) and Policy CL1(a) + (f) in the Core Strategy and Policies 6.1(b) + (i) and 6.10 in the London Plan

Access for the disabled

- 4.24 It is requested that DDA compliance is demonstrated for the proposed grading of the link's slope.

Impact on transport

Traffic congestion

- 4.25 The Wood Lane/Du Cane Road junction is assessed in the applicants Transport Assessment (TA). This junction is situated between the development site and North Pole Road and its assessment gives an indication of the potential traffic impact on North Pole Road. The assessment concludes that the junction can operate with acceptable queue and delays in the next few years however due to background traffic growth, the junction reaches near capacity and measures to improve junction operation will be required in the future. Only a small proportion of the predicted increase in traffic is attributable to the development. Development traffic would increase queue lengths at the signals by approximately one vehicle.

- 4.26 The Wood Lane/Scrubs Lane/North Pole Road junction was not assessed as part of the TA. The Royal Borough had requested this in response to the scoping report. However, there should be lesser impact at this junction than the Wood Lane/Du Crane Road junction, as development traffic dissipates.
- 4.27 There should be no significant impact on traffic conditions in the Royal Borough and there is therefore no conflict with Policy CT1(b) in the Core Strategy.
- 4.28 However, strong concerns are raised regarding the cumulative impact of developments within the Opportunity Area. The submitted Transport Assessment does not include a detailed cumulative impact assessment. Rather it refers to work currently being undertaken by TfL and acknowledges that a suite of mitigation measures will be required including junction capacity enhancements. This may have potential impact on traffic congestion in the Royal Borough contrary to Policy CT1 of the Core Strategy

Public transport

- 4.29 Shepherd's Bush Overground Station is 1.8km distant, too far to contribute to the PTAL for the site, and too far for many to walk from the station to the site. Based on mode data from TRAVL surveys of similar sites, the development would generate 1,388 two way (overground) rail passenger trips per day.
- 4.30 The site is only 300 metres from the location of the former North Pole Road station. Reopening this station would satisfy the additional demand for overground rail trips generated by the development and would significantly improve journey times for those travelling to and from the site by rail.
- 4.31 In Core Strategy Policy CT2 (e) , a new station at North Pole is strongly supported as it would improve the public transport accessibility in an area of the Borough which is currently poorly served. This would raise the PTAL of North Pole Road area from 2 (poor) to at least 3 (moderate). Officers consider that the feasibility of a new station should be explored as part of the Development Infrastructure Funding Study currently being prepared to inform the draft WCOAPF.

Cycling

- 4.32 It is proposed to provide space for a bicycle hire scheme docking station on the site. Such a station would be isolated without providing a number of docking stations in North Kensington to the east. The nearest docking station to the east is at Walmer Road 1.2km away. The applicants should consider the provision of provide funding for at least six docking stations to tie their site into the Bicycle Hire Scheme network.

Impact on air quality

- 4.33 The Royal Borough raises the following concerns with the methodology used for the air quality analysis in the Environmental Statement, as detailed below:
1. No receptors were located within the Royal Borough, despite it also being an air quality management area and that its road networks will be impacted upon
 2. Actual speed can have significant impact on emissions and should be identified in calculating the traffic emissions, and in discussing cumulative traffic impacts at para 19.6.10
 3. Cumulative impact of NO_x and PM₁₀ emissions from the fixed energy sources within the development are not addressed
 4. Cumulative impacts from other operational developments in the area should also be taken into account (as advised in London Councils (January 2007) Air Quality and Planning Guidance – revised edition)
- 4.34 With regard to the Construction Management Plan, it is recommended that a more detailed reaction to the results of the real-time dust monitors on the site, with the requirement to notify the Local Authority of any major dust levels or events, is generated.
- 4.35 In the absence of the further information requested above, the air quality assessment is incomplete and the Royal Borough considers that the proposals are contrary to Policy CE5 in the Core Strategy and Policy 7.14 in the London Plan.

Impact on ecology

- 4.36 There are no impacts on ecology within the Royal Borough and no objections are raised on this basis. However, a number of conditions are suggested regarding the use of green/brown roofs in the development together with the inclusion of artificial next boxes in the building design. This is to provide enhancements to the corridor adjoining the railside habitat.

Impact from noise and vibration

- 4.37 Vibration during construction would have no impact on properties in Latimer Road. However, construction noise should have been considered in the Environmental Statement in relation to the rear of properties on the west side of Latimer Road. Many are commercial but some, including Soane House, 303 Latimer Road, are residential and construction noise impacting on these properties should be detailed in Table 8.7 of the ES. The predicted change in daily ambient noise level for these properties in Latimer Road due to construction noise should be stated and whether or not any mitigation is necessary.

4.38 In the absence of the above information, the noise and vibration assessment is incomplete and the Royal Borough considers the proposals to be contrary to Policy CE6 in the Core Strategy and Policy 7.15 in the London Plan.

4.39 In the operational phase, noise from the building services plant installed within the completed development with the potential to propagate to RBKC should comply with the RBKC Noise SPD standards, which are derived from PPG24, para 19.

"When the new source does not attract the +5dB correction of Para 8 of BS4142 the rating level shall be 10dBA below the measured background noise level LA90. Where the new source would attract the +5dB correction the difference shall be -15dB. These requirements will be a positive indication that complaints are unlikely. It should be recognised that the planning system is a proactive means of controlling the increase in ambient background noise within the Borough and these requirements will assist in these aims."

Drainage and flood risk

4.40 The Flood Risk Assessment is very thorough and covers all the issues on flood risk. Surface water discharge is being reduced considerably, and it is proposed to provide green roofs, attenuation storage and potentially a rainwater harvesting system. These are all positive measures and no objection is raised.

Socio-economic infrastructure

4.41 The principal concern is the impact of the socio-economic effects on the Royal Borough in terms of infrastructure. Additional residents close to the Royal Borough's western boundary may have an impact on existing infrastructure in the Borough such as schools and GP surgeries and these needs to be taken into account together with the cumulative impact from other large developments such as Westfield.

Healthcare

4.42 In terms of healthcare, the nearest GP Practice is the White City Health Centre on Australia Road which is approximately 1 km from the site. It is estimated that 1,345 people will become residents in the development. The applicants state that:

"Taking into account the current existing population, and the fact that the Imperial West scheme introduces a new health centre on the site it is reasonable to assume that there will be no adverse effects on local health care."

- 4.43 Whilst this may be the case, no information is provided to justify this claim, beyond the bald figures. More information is required to ascertain whether the new health centre will cater for the rise in population and the cumulative impact of other large developments in the vicinity, including a proper assessment of supply versus demand. It also does not take into account the cumulative impact of other large developments in the vicinity which have a significant residential component, such as the Westfield centre extension.
- 4.44 It can therefore not be concluded that there will not be an impact on health facilities within the Royal Borough and further information is requested in this respect. In the absence of clarifying information objection is raised regarding the healthcare infrastructure impact, and the proposals are considered to be contrary to Policy C1 in the Core Strategy and Policy 3.17 in the London Plan.
- 4.45 It is also imperative that the fitting out and opening of the health centre coincides with the construction works so it is ready for occupation at the same time as the residential accommodation is ready for occupation.

Education

- 4.46 With regard to education, the applicant's note that the school capacity ONS statistics for 2010 showed that there was a surplus of 459 places at Local Authority (LA) maintained primary schools in the borough and 353 surplus places at LA maintained secondary schools within the Borough.
- 4.47 The total child yield for the development has been estimated at 49 children and on this basis the applicant's comment that there is surplus capacity within the borough to deal with this.
- 4.48 However, in reality the situation is more complicated than this – the surplus capacity (if it is correct) does not take into account the geographical location of the schools and it also does not take into account the cumulative impact of other large developments in the vicinity which have a significant residential component, such as the Westfield centre extension.
- 4.49 In the absence of clarifying information objection is raised regarding the education infrastructure impact, and it is considered the proposals are contrary to Policy C1 in the Core Strategy and Policy 3.18 in the London Plan.
- 4.50 In order to mitigate some of the impacts on the Royal Borough, financial contributions would be required proportionately to the impacts of the proposals. Due to the draft nature of the DIFS no security has been provided that this will be the case. The Royal Borough therefore objects to the proposals on the basis of insufficient financial contributions to mitigate the impacts of the

development on public transport and socio-economic infrastructure.

5.0 PUBLIC CONSULTATION

- 5.1 1,771 letters of notification were sent to occupiers within the Royal Borough; the recipients were advised to send their comments directly to the London Borough of Hammersmith and Fulham. Any comments which were sent to the Royal Borough of Kensington and Chelsea have been forwarded to Hammersmith and Fulham.
- 5.2 A copy of the Mayor's 'Stage 1' letter is attached to this report for information.

**JONATHAN BORE
EXECUTIVE DIRECTOR, PLANNING AND BOROUGH DEVELOPMENT**

List of Background Papers:

The contents of file OB/12/00301 save for exempt or confidential information in accordance with the Local Government (Access to Information) Act 1985.

**Report Prepared By: OWWO
Report Approved By: DT/GS/JB
Date Report Approved: 23/03/2012**

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