Planning Statement
141-163 Freston Road, London, W10 6TH

March 2018
## Contents

1. Introduction ........................................ 1
2. Site and surrounding area .......................... 3
3. Proposed development .............................. 6
4. Pre-application engagement ....................... 7
5. Policy context ......................................... 11
6. Planning assessment .................................. 12
7. Conclusions ........................................... 20

Appendix 1: Existing Tenants Schedule ............. 21
1. Introduction

1.1 This Planning Statement has been prepared on behalf of Freston Road Property Bard Ltd to support an application for full planning permission for the following description of development:

‘Demolition of existing buildings and construction of a new mixed use building comprising 293 sqm retail floorspace at ground floor level (flexible A1-A5 uses), 17,425 sqm office floorspace at part ground floor and all upper floors (use class B1) and 209 sqm flexible multi-use floorspace (B1/D1) at part ground floor level together with ancillary accommodation at part ground floor, basement and sub-basement level, associated landscaping, parking and servicing.’

1.2 The site is located at 141 – 163 Freston Road in a predominantly mixed-use area; comprising office, light industrial, warehouses, storage, residential and ancillary services. The site is located close to Latimer Road Underground Station which is served by the Hammersmith and City (H&C) and Circle lines.

1.3 The site is a strategically important site within the Freston Road Employment Zone. It is not located within, or in close proximity to, a conservation area and no listed buildings are located on the site or in the immediate vicinity.

1.4 The site is currently underutilised being occupied by an unattractive 1980’s 4-storey brick office building (Use Class B1) with the former Travis Perkins builders’ merchants (formerly Use Class B8) to the rear and an open-air car rental compound to the north.

1.5 The applicant has undertaken extensive pre-application discussions with the Royal Borough of Kensington and Chelsea (RBKC) and the Greater London Authority (GLA) and has also undertaken a review by RBKC’s Architectural Appraisal Panel (AAP) which has better informed the design, setting and layout of the proposed office-led mixed use development. The applicant is a local landowner and is committed to the delivery of this new office led mixed-use scheme.

1.6 The structure of this Planning Statement is as follows:

- **Section 2 Site and surrounding area**: provides a description of the site and the surrounding area and provides a detailed history of all planning applications for the site as set out on RBKC’s online planning register.

- **Section 3 Proposed Development**: provides a detailed description of the proposed development, highlighting the key aspects of the scheme.

- **Section 4 Pre-application Engagement**: details the process undertaken with RBKC prior to submitting this application, and the evolution of the proposals.

- **Section 5 Planning Policy Context**: sets out the planning policy framework against which the planning application should be assessed.

- **Section 6 Planning Assessment**: provides an analysis of the material planning considerations pertinent to the proposed development and provides justification for the development and outlines the findings of the supporting specialist reports.
• **Section 7 Conclusions**: summarises the key features and benefits of the proposed development and the reasons as to why planning permission should be granted.

1.7 This report provides an overview of the proposals and reviews the key planning policy and wider material considerations relevant to the determination of the planning application. This report should be read in conjunction with the Design and Access Statement prepared by Stiff + Trevillion, the submitted architect plans and the suite of technical documents to which this report cross-references including:

• Acoustic Report by Hoare Lea;
• Air Quality Assessment by Hoare Lea;
• Construction Method Statement by Tier Consult;
• Construction Traffic Management Plan by Mayer Brown Limited;
• Daylight and Sunlight Report by GVA Schatunowski Brooks;
• Design and Access Statement by Stiff + Trevillion;
• Energy Report by Hoare Lea;
• Flood Risk Assessment and Drainage Strategy by Tier Consult;
• Ground Investigation Report by Tier Environmental;
• Heritage and Townscape Visual Impact Assessment by Turley Heritage;
• Sustainability Report by Hoare Lea;
• Planting and Landscaping details by Briarwood;
• Servicing Management Plan by Mayer Brown;
• Site Waste Management Plan by Tier Environmental;
• Statement of Community Involvement by Belgrave Communications;
• Town Centre Impact Assessment by Turley;
• Transport Assessment, Travel Plan and PERS analysis by Mayer Brown;
2. Site and surrounding area

2.1 The site is an island site located at the junction of Bard Road and Freston Road bounded to the north by a railway viaduct carrying the H&C and Circle London Underground lines.

2.2 The site currently comprises a 1980’s 4-storey brick office building (Use Class B1) fronting Freston Road and a former builders merchant (formerly Use Class B8) known as 1 Bard Road which includes a warehouse building and hard standing.

2.3 The previous owners exercised their rights under The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) to convert this part of the existing building (known as 1 Bard Road) to Use Class B1 office and the external storage area has recently been used as a vehicle rental yard (Use Class Sui Generis). The existing tenant details including tenancy arrangements are set out within Appendix 1.

2.4 There are separate access points from Freston Road and Bard Road which each serve half of the site. There are currently 12 private parking bays for the office use fronting Freston Road.

2.5 The site is not located in a Conservation Area, however the Grade II listed former Holy Trinity Church now known as the Harrow Road Youth Club is located further along Freston Road. The site is close to the border of Hammersmith and Fulham.

2.6 The site is located in a mixed use area which accommodates a variety of offices and light industrial buildings. The Freston Road area has maintained a commercial character with a clear influx of fashion and media based companies accommodating the area which is known as Notting Dale Village. Companies in this area include: Chrysalis Records, Marino Testino (photographers), Louise McBain (publishers), Stella McCartney (fashion), Cath Kidston (fashion) and more recently by Monsoon / Accessorize (fashion) and TalkTalk (communications).

2.7 Further development to the west within the White City Opportunity Area will add a multitude of high rise residential and commercial developments to the existing Westfield Shopping Centre.

2.8 The site’s Parking Transport Accessibility Level (PTAL) is 2/3, which is described as ‘poor’ although the site is located close (3 minute walk) to Latimer Road Underground Station (approximately 260m away). It is likely that the site has a low PTAL rating due to the limited bus provision in the immediate vicinity of the site.

2.9 White City (Central line) and Wood Lane station (H&C and Circle Line) are also in close proximity but are currently separated from the site by the West Cross Route and rail lines. A planned footbridge will allow for access to these stations in the future although this does not form part of this application.

2.10 The site is located in Flood Zone 1 which has a low risk of fluvial and tidal flooding. This site also lies within the North Kensington Critical Drainage Area due to the high risk of surface water flooding in the area.
Relevant planning history

2.11 The site’s two addresses have limited planning history, which is summarised below:

<table>
<thead>
<tr>
<th>Reference number</th>
<th>Description</th>
<th>Decision</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>141 – 163 Freston Road, London, W10 6TH</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>00876/0091/000</td>
<td>Erection of a part four storey, part single storey building providing four retail units, accommodation for a builders merchants &amp; offices, together with related car parking.</td>
<td>Granted in October 1986</td>
</tr>
<tr>
<td>00876/0091/000</td>
<td>Use of first floor of frontage building as offices (class B1) &amp; rear building as a warehouse</td>
<td>Granted January 1988</td>
</tr>
<tr>
<td>00876/0091/000</td>
<td>Change of use of 4 units on ground floor from retail(class A1) to business (class B1)</td>
<td>Granted in October 1988</td>
</tr>
<tr>
<td>00876/0091/000</td>
<td>Change of use from business purposes (class b1) to a sandwich bar/cafe (class A3)</td>
<td>Granted in June 1991</td>
</tr>
<tr>
<td>PP/02/02166</td>
<td>Change of use from Class A3 (Food and Drink) to Class B1 (Business Use) (Unit One)</td>
<td>Granted in November 2002</td>
</tr>
</tbody>
</table>

| **1 Bard Road, London, W10 6TP** | | |
| TP/98/00162 | Re-cladding of elevation of existing warehouse. | Granted 23 April 1998 |
| TP/98/01440 | Erection of two storey extension in connection with use of Arch 60 for Class B1 (light industrial) purposes, to link with existing Class B1 building at 1 Bard Road. | Granted 11 June 1999 |
| PP/13/04434 | Application for prior notification of demolition (required in advance of redevelopment of site). | Planning permission not required |
| PP/14/04743 | Ground floor level extension and the installation of new windows and doors on the southern, northern and western elevations of the building. | Granted 14 October 2014 |
| PP/15/06680 | Variation of Condition 2 (compliance with approved drawings) of planning permission 14/04743 (Ground floor level extension and the installation of new windows and doors on the southern, northern and western elevations of the building) to allow for elevational changes | Granted 10 December 2015 |
2.12 It has been noted that the most recent variation of planning permission at 1 Bard Road (RN: PP/15/06680) has been potentially implemented by the previous owner without complying with the prior to commencement condition (Condition 4). This condition required the submission of detailed elevation and section at 1:20 scale of any proposed external roller shutters. It is noted that the revised plans do not propose any external roller shutters and an exchange of letters between the previous owner and RBKC may have deemed this condition not necessary to discharge.
3. Proposed development

3.1 The application seeks full planning permission for the following description of development:

‘Demolition of existing buildings and construction of a new mixed use building comprising 293 sqm retail floorspace at ground floor level (flexible A1-A5 uses), 17,425 sqm office floorspace at part ground floor and all upper floors (use class B1) and 209 sqm flexible multi-use floorspace (B1/D1) at part ground floor level together with ancillary accommodation at part ground floor, basement and sub-basement level, associated landscaping, parking and servicing.’

3.2 The proposed new B1 office building will provide an uplift of 15,307 sqm of new office floorspace which will greatly assist in helping provide the necessary office space across the borough and create new employment opportunities.

3.3 As set out within the architect’s proposed plans and the Design and Access Statement, the proposals comprise the following:

- Construction of a new part 6 / 7 / 8 / 9 storey office-led mixed-use development
- 293 sqm of new flexible A1 – A5 retail space at ground floor level;
- 206 sqm of flexible double height multi-function space;
- Co-working / business lounge space on ground and mezzanine floors;
- Creation of vehicle and cycle ramp;
- Two bay off road servicing facility;
- 56 external visitor cycle parking spaces;
- Garden terraces accessible from the fifth, sixth, seventh and eighth floors.
- New public seating area to the north east of the site for use outside the flexible A1 – A5 retail unit;
- Creation of a sub-basement and basement (accessed from Bard Road) to facilitate:
  - Plant and machinery;
  - 12 disabled car parking spaces;
  - 130 long stay cycle spaces / storage;
  - Office ancillary gym;
  - Showers, changing rooms and toilet facilities.

3.4 The design of the proposed office development has sought to demonstrate a high degree of flexibility within each floorplate, allowing sub-division to accommodate any micro, small and medium sized enterprises that may occupy the building in the future. This is demonstrated within the Design and Access Statement prepared by Stiff + Trevillion.
4. Pre-application engagement

4.1 The applicant and project team have engaged in extensive pre-application discussions with RBKC officers through two formal pre-application requests, in addition to presenting the scheme to the APP and a formal pre-application consultation with the GLA. This has enabled a productive dialogue around the refinement of the design approach and detail.

4.2 A public exhibition was held in order to inform local residents, businesses and stakeholders of the scheme proposals and design rationale. The project team also held a separate consultation meeting with representatives from St. Helens Residents Association and The Kensington Society. This process is set out in more detail in the accompanying Design and Access Statement by Stiff + Trevillion and the Statement of Community Involvement by Belgrave Communications.

4.3 As the scheme is located in an employment zone, the principle of a new modern office building is established and it has been noted that the RBKC emerging Local Plan Partial Review now supports all types of offices, regardless of size. This will be explained in detail in sections 5 and 6.

RBKC Pre-application

4.4 An initial Level Three Pre-application advice request was submitted to RBKC on 13 June 2017 (RN: PRE/AR/17/03816/LEV3). A Meeting was held on 4 July 2017 and formal written responses were received on 20 July 2017 and 4 August 2017. A summary of the headline comments are as follows:

- No policy objections to the loss of the car hire (Use Class Sui Generis).
- Welcome appropriately designed flexible office floorspace (to be able to be subdivided if considered necessary).
- The proposed Class A unit will likely make a positive contribution by serving both the building and surrounding area.
- Welcome the inclusion of flexible multi-functional space that increases the functional quality of the building.
- Welcome inclusion of a restaurant facility at ground / mezzanine level to help animate the building frontage, undercroft and adjacent open space.
- The footprint of the proposed building should be set back considerably from the viaduct and spur to comfortably accommodate the future bridge.
- The proposed parking should be reduced to a maximum of 12 blue badge bays within the basement. A minimum of 40% of the bays should be provided with electric charging points.
- The proposed realignment of the footway and removal of parking on Freston Road is acceptable. The provision of a signal controlled single lane ramp would be acceptable subject to detailed design.
• Cycle parking should be in line with the London Plan and further cycle spaces for visitors should be provided externally, preferably within the colonnade.

• The provision of a two bay servicing facility accessed off Bard Road is considered appropriate. A dedicated ramp for cycle parking access and showering and changing facilities is welcomed.

4.5 The project architects, Stiff + Trevillion, presented the scheme to RBKC’s AAP on 11 October 2017 with feedback being received on 24 October. Feedback included:

• Welcome the commitment to develop a contemporary office building with active ground floors in an area that would benefit from added vitality.

• Encouragement to rationalise the entrances / routes to allow a more intensive ground floor layout with additional space for co-working or the multi-use space.

• Welcome provision of a new, well landscaped, active public space towards the north of the site. It was acknowledged that this would support an attractive, accessible through-route and landing point for the new footbridge (not forming part of this application).

• Suggestion to re-think the colonnaded design onto the south and especially east elevations, suggesting that the space could be infilled and the elevations brought forward to the back edge of the pavement to provide additional active floorspace.

• Support for stepped block heights and the position of 9 storeys on the North West corner which encourages more variation between the blocks and pulling down the height of the south block(s).

• Greater expression of the three dimension fractured massing is needed to allow for a more ‘playful’ elevational treatment.

4.6 Following the above feedback from both RBKC officers and the AAP, the project team continued with detailed design, taking on board the comments received and incorporating M&E design input and key changes to the scheme design can be summarised as follows:

- The building footprint was realigned to create a more generous setback to the north of the site, thus providing a generous public realm area and thoroughfare to the new footbridge.

- The massing was broken down further to include terraces on the east and north facades, which better respond to the heights of adjacent buildings.

- The steel channel cladding initially proposed was replaced with profiled glazed terracotta to soften and enrich the elevations.

- Each of the quadrant blocks would have a subtly different colourway to define the different massing elements.

- The ground floor internal ‘street’ was rationalised to prioritise the main entrance on Freston Road and remove the western entrance.
- On the eastern Freston Road elevation the colonnade was omitted and active uses increased at street level.
- Parking provision within the basement was reduced to 12 accessible spaces.

4.7 A Level Three Request for further advice was then submitted to RBKC on 5 December 2017 (RN: PRE/AR/17/07454/L3FU) based on this revised scheme. A meeting was held on 18 December 2017. RBKC’s formal written response was received on 9 and 10 January 2018 and can be summarised as follows:

- Welcome adjustments to ground and mezzanine layouts including the T shaped layout infill.
- Suggestion to include a ground floor disabled toilet and to include dedicated storage space in multifunctional space.
- A Town Centre Impact Assessment needs to consider both A and B class uses.
- The re-provision of the gym would be acceptable and should be made available to members of the public as well as employees within the building.
- The building must be set back from the spur so as to provide indivisibility between the future bridge and Freston Road.
- Welcome revised façade line on the north elevation and omission of the colonnade on the east elevation.
- Welcome increased articulation around the building entrances to enhance the fractured form.
- Proposed number of storeys is welcomed with a reduced mid storey is welcomed including minimisation of plant enclosure to reduce the overall height.
- Welcome the introduction of setbacks on the east elevation at 5th floor level and the north elevation at 6th floor level.
- Additional views should be investigated and included in HTVIA.

GLA Pre-application

4.8 As the planning application will be referred to the GLA under the Mayor of London Order (2008) (development over 30 metres in height (outside the City of London)) a pre-application submission was made to the GLA on 5 January 2018. A pre-application meeting was held at City Hall on 6 February 2018 with both officers from the GLA and TfL in attendance.

4.9 Pre-application feedback was received on 16 February and 7 March 2018 and can be summarised as follows:

Principle of use
- The office use is supported by the current London Plan, draft London Plan and emerging and local policy. The limited retail and leisure uses at ground and basement are also supported in this location.
• Identify how the proposals will meet the need of micro, small and medium sized enterprises. The planning application should demonstrate flexible use and show how floorplates can be divided and how the servicing and day to day working would operate.

• Appropriate affordable floorspace should be considered.

• Full details of existing uses / floorspace, existing occupiers, tenancy arrangements, assistance in re-location should be included in a full submission.

Design
• Acknowledged level of pre-application discussions the applicant has undertaken with RBKC and their AAP.

• Encouraged to engage in discussions with TfL (who own the railway arches) to identify uses within the arches that would complement this scheme.

• Encouraged to resolve further design work to deliver a well-defined and functional public realm.

• The recessed main entrances to the North-East and North-West of the building should be given more prominence; choice of lift access to the basement cycle storage area as an alternative to the ramp is welcomed.

• The extended elevation to hide the plant on the roof should be well integrated with the overall theme of the elevations.

Transport
• TfL requested a Pedestrian Environment Review System (PERS) audit or similar is undertaken to the nearest bus stop, stations and local facilities.

• The public realm should be designed in accordance with the draft London Plan Policy T2 Healthy Streets.

• The provision of 12 accessible spaces (with 20% electrical charging points) is acceptable however a car free development is welcomed.

• Long and short stay cycle parking across land uses should be provided (with 5% of stands to accommodate larger cycles).

Public exhibition

4.10 A public exhibition took place on 19 February 2018 at The Harrow Club, 187 Freston Road, London, W10 6TH.

4.11 The exhibition was open to members of the public from 3.30pm – 7.30pm. A total of 9 people attended including a local Ward Councillor and 4 feedback forms were completed / received. Overall the use and design of the scheme was welcomed.

4.12 Full details of the consultation strategy and attendees / comments received at the exhibition are detailed within the submitted Statement of Community Involvement prepared by Belgrave Communications.
5. **Policy context**

5.1 The relevant Development Plan documents within the Royal Borough of Kensington and Chelsea (RBKC) consist of the following:

- The London Plan (2016);
- RBKC Consolidated Local Plan (CLP) (2015);
- RBKC Unitary Development Plan (UDP) Extant Policies (2002);
- RBKC Proposals Map (2010)

Material considerations include the following:

- National Planning Policy Framework (NPPF) (2012) and the associated National Planning Policy Guidance (NPPG); and
- London Plan and RBKC Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPD).

5.2 The Draft London Plan was published on 29 November 2017 and consultation ended on 2 March 2018. The draft will now be reviewed by an independent Planning Inspector at the Examination in Public. It is anticipated that the New London Plan will be adopted in Autumn 2019.

5.3 The Draft NPPF and NPPG was published by the Ministry of Housing, Communities and Local Government on 5 March and 9 March 2018 and are currently under consultation until 10 May 2018. At the time of submission, and according to the provisions of paragraph 216 of the NPPF, neither the draft London Plan or the draft NPPF are sufficiently advanced in the consultation process to carry any weight as material considerations in the decision making process.

5.4 RBKC are undertaking a Partial Review of the existing Local Plan which is currently at the submission and examination stage. Adoption of the emerging plan is expected in the summer of 2018 (although this may be subject to change). Now the revised policies have been submitted for examination, they are afforded increasing weight as material considerations in the determination of planning applications.

5.5 There is no Neighbourhood Plan adopted or emerging that applies to the subject site.

**Designations**

5.6 The site lies within the Freston Road Employment Zone and is within an Air Quality Management Area (AQMA).

5.7 The emerging RBKC Proposals Map designates the site as being within the North Kensington Critical Drainage Area. The site is located in Flood Risk Zone 1.

5.8 The site is not located within, or in close proximity to, a conservation area and no listed buildings are located on the site or in the immediate context. The nearest listed building is the Grade II listed former Holy Trinity Church (Harrow Road Youth Club) and the Thomas Jones Primary School located at the north of the raised railway track.
6. Planning assessment

6.1 The key policy considerations for the adopted London Plan and RBKC’s Consolidated Local Plan and Local Plan Partial Review are assessed below.

Office and retail use

6.2 The principle of new B1 office accommodation, including a significant uplift in B1 floorspace at the site is supported in both current London Plan Policies 4.1, 4.2 and 4.3 and the Emerging London Plan Policy E1 and E8.

6.3 The provision of 17,634 sqm of office space (including 209 sqm of flexible B1/D1 multi-function space) and 293 sqm of ground floor retail space will help to meet RBKC’s CLP Policy CP1 which seeks to provide 86,600sqm of office floorspace by 2028 and 9,700sq.m of retail floorspace to 2023 across the borough.

6.4 Furthermore, RBKC Policy CV7 seeks to continue to support an integrated mix of housing, employment and social and community uses within the vision for the Latimer area. The introduction of A class units are also supported by CLP Policy CF1 as they will make a positive contribution to both the building and the surrounding area. To ensure maximum flexibility for letting and ensure these units provide an active frontage at the earliest opportunity, these units are proposed to be flexible A1 – A5 uses.

6.5 RBKC’s CLP Policy CF5 currently seeks to promote and protect small and medium sized office developments in Employment Zones. The Emerging Local Plan seeks to fundamentally revise this policy and now supports new large scale office development (exceeding 1,000 sqm GEA) within Employment Zones. Furthermore, Policy CF5 seeks to promote Employment Zones as centres for innovation, locations for large and small businesses and for workshops (whether stand alone or part of large business centres).

6.6 The proposed development has been designed to offer a high degree of flexibility within the office levels with each floor being served by a central core which allows for the potential sub-division of each floor. The ground floor and mezzanine levels also offer co-working / business lounge space ‘break out’ areas for office workers to enjoy.

6.7 In this context, there is policy support for an office-led scheme at the proposal site that offers complete flexibility for a broad spectrum of occupation from one single tenant up to four independent tenants per floor.

Other uses

6.8 It is important to note that the applicant is committed to delivering this project once planning permission is secured. The applicant will offer to provide assistance to existing occupiers with finding alternative premises. Further details in this regard are provided in the tenancy schedule which forms Appendix 1.

6.9 The RBKC S106 calculator estimates that the number of full time jobs generated by the net increase in floorspace at the site will be 806 FTE which provides a significant contribution towards the employment targets within the London Plan. Rents in the North Kensington office sub-market are lower than elsewhere in the Borough and thus rental levels for the new building will be at a more affordable level by definition of their location. This will make the building attractive to Small and Medium sized Enterprises.
(SME’s). The proposed 209 sqm flexible B1/D1 multi-function space adds a further dimension and could provide an extremely valuable shared space to bring together different tenants within the building for creative and/or social events.

6.10 The B1 ancillary uses include a gym at basement level. RBKC previously expressed a desire (during first stage pre-application) to retain a publicly accessible gym on site however, the existing gym is not a lawful use and is only located on site temporarily on a short lease discounted rent basis as a result of planned redevelopment (See Appendix 1). It is therefore not protected by policy. Notwithstanding this, the applicant will offer to assist all existing tenants in finding alternative premises when the break clause is implemented.

Town Centre Impact Assessment

6.11 A Town Centre Impact Assessment has been prepared by Turley to respond to the current Local Plan policy which seeks to focus large office developments in town centre locations. This policy position is going to shortly be revised with the adoption of the emerging Local Plan Partial Review (later in 2018) when (under revised Policy CF5) all offices are to be supported in the allocated Employment Zones, regardless of size. Policy CF5 also supports A Class and town centre uses where they help support the business character and function of the Employment Zones.

6.12 Furthermore, the evidence base for the new draft London Plan indicates a need for 45,000 sqm of office floorspace in RBKC to 2028. The Council’s monitoring report (published in 2018) highlights a very low office vacancy rate (just 2.2%). In view of these factors and the different office sub-markets (with no higher order town centre in the North Kensington sub-market), the office-led proposal at Freston Road is not expected to lead to a re-location of occupiers from an existing office scheme in a town centre or undermine decisions to proceed with committed or proposed office-led schemes in those centres.

Design and Heritage

6.13 A Design and Access Statement (DAS) has been prepared by Stiff + Trevillion and includes a site appraisal, review of planning policy considerations, overview of consultation and community involvement, explanation of the scheme design, landscaping and public realm proposals and vehicle and cycle access. The design proposals are in accordance RBKC policies CR2, CR4, CL2 and D8.

6.14 A Heritage, Townscape and Visual Impact Assessment (HTVIA) has been prepared by Turley Heritage which has thoroughly studied the application site and its built heritage, townscape and visual context, and through understanding and appreciating these features and resources, a robust impact appraisal of the Scheme Proposal has been undertaken.

6.15 The assessment of effects on townscape character identified that the proposed development would not cause a direct change to the townscape characteristics of either Wood Green or Latimer Road. Effects on townscape character were generally considered likely to be beneficial due to the high architectural quality of the proposed building (compared with the existing building), the introduction of improved public realm with improved connectivity and increased vibrancy in the area arising from an increased mix of uses and level of activity in the area.
6.16 Some modest potential adverse effects on townscape character were also identified including: an increased prominence of built form on the skyline; and, a narrowing and overshadowing of Freston Road. However, these effects were not to the extent that the proposed height and massing of the building was considered likely to be overbearing or overly dominant in the townscape. Overall it is considered that the development would have a beneficial effect on the local townscape character.

6.17 The HTVIA assessment appropriately identifies the heritage assets that could be affected by the proposed development, and describes how they will be valued, conserved, re-used and or incorporated where appropriate. This is in accordance with Policy 7.8 of the London Plan with regard to built heritage. The proposals are also considered to comply with relevant RBKC local heritage policies including CL1, CL2, CL3, CL4, CL11, CL12 and also further guidance in the Avondale and Avondale Park Gardens Conservation Area Appraisal 2015 and the London Borough of Hammersmith and Fulham Wood Lane Conservation Area Character Profile 1996.

Transport and Access

6.18 A Transport Assessment and Travel Plan have been prepared by Mayer Brown. The Transport Assessment demonstrates that the site is appropriate for a development of this scale. The report concludes that the development will have a positive impact on the local area and that the development is likely to generate significantly less traffic than the current site uses.

6.19 Whilst it is acknowledged that the draft London Plan does not carry any weight as a material consideration, the Transport Assessment also addresses the Draft London Plan Policy T2 ‘Healthy Streets’ and includes a Pedestrian Environment Review System as requested by TfL. The report concludes that the proposed development will improve the local pedestrian facilities through improvements to the footways on Freston Road and on Bard Road, as well as the creation of a new attractive public realm in the north of the site.

6.20 The site has a low PTAL of 2/3 which is likely due to limited bus provision in the immediate vicinity of the site. There are additional bus services available at White City Bus Station, which is currently within a 15-minute walk of the site however this walk time and distance will be significantly improved following the introduction of the planned foot and cycle bridge (not forming part of this application) over the A3220.

6.21 The pedestrian footpaths on Freston Road and Bard Road will be greatly improved through the realignment of dropped curbs on Bard Road, levelling of the footway, removal of the 12 car parking spaces at the front of the existing site and the creation of new public realm.

6.22 Pedestrian access to the main entrance of the site is provided from Freston Road. There are three additional access points; two to the north (one between the cores and to and from the proposed café / restaurant) and one to the south accessed from the external secure cycle storage and public realm space.

6.23 Vehicle and servicing access to the site is provided from Bard Road in accordance with RBKC Policy CR7. The access consists of an entry lane and an exit lane, leading to the deliveries area or to the building’s basement via a signal controlled ramp. All access points will be step-free, with all floors of the building accessible by lift.
6.24 Cycle parking is accessible through a separate automatic cycle entrance at the north of the building. Stairs and an associated cycle track provide access from street level to the basement cycle parking areas.

6.25 The site is accessible via bus, London Underground and national rail and it is expected that its PTAL rating will significantly improve with the completion of the bridge over the A3320.

Car parking
6.26 12 disabled car parking spaces (for use by Blue or Purple Badge holders) are provided within the basement which is in accordance with the maximum standards set out in Policy 6.13 of the London Plan and RBKC Local Plan policies.

Cycle parking
6.27 The development will provide 130 long stay and 56 short stay cycle parking spaces in a secure location in the basement, in line with the standards set out in policy 6.9 of the London Plan and partially exceeding the draft London Plan (2017). It is also noted that the site is already well suited to be accessed by cycles with two Santander Cycle hire docks located near the site on Freston Road (120m north of the site, or 75m south).

Stopping-up order
6.28 A stopping-up application relating to a small part of the publicly maintainable footway on Freston Road will be submitted by Osborne Clarke LLP under s253 of the Town & Country Planning Act alongside the planning application submission. This separate submission will detail which areas are required to be stopped-up, detailing any relevant highways information, copies and title plan for the title involved (NGL532728) and a marked-up Highways Plan.

Basement Construction and Traffic Management
6.29 The proposed scheme is considered a large site and therefore the proposed basement and a lower sub-basement level to hold the required plant machinery (cold water storage, wet riser tanks and pumps, rainwater attenuation storage tanks and sprinkler tanks and pumps) which are acceptable under RBKC Policy CL7.

6.30 A Construction Method Statement (CMS) has been prepared by Tier Consult and has been structured to follow the RBKC 2016 Basements SPD including the sequential steps that have been taken to address all matters in that SPD and basement policy CL7. The report has also followed the guidance set out in the adopted 2009 subterranean development SPD.

6.31 The CMS includes site specific details of the demolition, excavation, temporary works and construction techniques, including details of the potential impact and safeguarding of the subterranean development on the neighbouring structures and infrastructure, based on the specific site characteristics, geology and hydrogeology.

6.32 The CMS ensures the relevant issues relating to the redevelopment of the site are taken into consideration, allowing for appropriate mitigation measures to be identified and implemented where necessary.

6.33 A draft Construction Traffic Management Plan (CTMP) pro-forma has been prepared by Mayer Brown in order to demonstrate a proportionate and sensible response to the requirements of the development balanced against impact upon the surroundings.
Daylight and Sunlight

6.35 A Daylight and Sunlight Report has been prepared by GVA Schatunowski Brooks to consider the potential effects that the proposed development may have upon neighbouring residential properties in accordance with the 2011 BRE Guidelines. The report concludes that the proposed development is acceptable on daylight and sunlight grounds.

6.36 Specifically, the report concludes that all windows assessed comply with the sunlight criteria and that 146 – 150 Freston Road and 1- 22 Cheping House will fully adhere to the BRE Daylight and Sunlight Guidelines.

6.37 The majority of windows and rooms within 1-4 Cian House will fully comply with the VSC an NSL daylight criterion however a very small number (3 windows) fall below the recommended criterion. However these rooms retain good levels of daylight distribution and therefore the overall planning position is deemed to be acceptable.

6.38 Although a number of windows and rooms within 137 – 139 Freston Road fall below the recommended daylight criterion, the windows that serve primary habitable rooms have the benefit of mitigating the windows that fully adhere to the BRE guidelines to ensure that acceptable levels of daylight are retained in the majority of rooms.

Ground Investigations

6.39 A Ground Investigation report has been prepared by Tier Environmental and in order to satisfy RBKC CE7 and The Model Procedures for the Management of Land Contamination Guidance CLR11.

6.40 The report concludes that the site investigation has illustrated that mitigation measures are required for the site. A remediation strategy has therefore been devised in order to make the site safe and suitable for redevelopment.

Flooding and Drainage Strategy

6.41 A Flood Risk Assessment (FRA) and Drainage Strategy including an assessment of the existing and proposed surface and foul water drainage has been prepared by Tier Consult in accordance with RBKC CLP Policy CE2.

6.42 The site is located in Flood Zone 1 with a low annual probability of flooding from all sources. The site is unlikely to flood except in very extreme conditions.

6.43 Development of the site will take place with separate systems for foul and surface water drainage. The site will discharge to the public combined sewers located within the vicinity of the site, using the existing connection.

6.44 In determining the future surface runoff from the site, the potential of using infiltration devices has been considered. It has been concluded that the site is unsuitable for
infiltration drainage due to the site ground conditions. Therefore, it will not be possible to discharge surface water runoff from the site via infiltration methods.

6.45 The proposed rainwater attenuation tank is proposed to be located within the sub-basement and the basement will be protected from flooding through the installation of a positively pumped device as illustrated on the proposed architect plans.

6.46 The drainage report concludes that storm water discharge rates are effectively reduced to 5.0 litres/second for all storm events up to 100 year + 30% climate change allowance to provide 86% betterment compared to the existing 1 year run-off rate.

6.47 A Surface Water Management Strategy for the site proposals has been developed to manage and reduce the flood risk posed by the surface water runoff from the site. An assessment of the surface water runoff rates has been undertaken, in order to determine the surface water options and attenuation requirements for the site.

6.48 In summary, the FRA demonstrates that the site can be operated with minimal risk from flooding and will not increase flood risk elsewhere. The site should not therefore be precluded on the grounds of flood risk in accordance with London Plan policies 5.12 and 5.13.

Energy and Sustainability

6.49 An Energy Statement has been prepared by Hoare Lea and demonstrates that through the implementation of passive design measures, and the inclusion of façade integrated photovoltaic arrays, that the proposed development is estimated to achieve 35% reduction in site-wide regulated CO2 emissions compared with the Building Regulations Part L (2013) ‘baseline’.

6.50 This meets the current London Plan requirements as well as the minimum passive design and total carbon emissions savings required by the draft London Plan. The project is expected to meet the minimum carbon emissions savings required by the current London Plan and therefore no carbon offset payment is proposed.

6.51 The report concludes that the following ‘Be Lean’ measures will be implemented:

- Reasonable glazing ratio and glass g-value to balance heat losses, heat gains and daylight.
- Fabric insulation levels achieving improvements over the Building Regulations Part L (2013) requirements.
- Fabric air permeability improvement upon Building Regulations Part L (2013) requirements.
- Highly efficient gas boilers.
- Highly efficient mechanical ventilation with heat recovery.
- Insulated pipework to minimise losses.

6.52 These measures are estimated to achieve a site-wide 26% reduction in regulated CO2 emissions beyond the requirements of the Building Regulations Part L (2013) in accordance with London Plan Policy 5.1 and RBKC Policy CE1.
Furthermore, a façade integrated photovoltaic (PV) array and roof top PV array are proposed which could result in a total array of approximately 480m². It is estimated that this could result in an additional reduction in regulated CO₂ emissions of approximately ~9% beyond the Building Regulations Part L (2013) ‘baseline’. Other low and zero carbon technology, including district network connection have been appraised, but either provide limited savings or are not feasible.

A Sustainability Statement has been prepared by Hoare Lea and concludes that the proposed development will achieve a BREEAM ‘Very Good’ rating as a minimum. Additional credits have been identified, which if included in the score, could allow the development to achieve an ‘Excellent’ rating if feasible.

Air Quality

An Air Quality report has been prepared by Hoare Lea in accordance with Policy CE5 which describes the potential air quality impacts associated with the construction and operation of a new office building, specifically with regards to the short term objectives for NO₂ and PM₁₀ as the site is designated within an Air Quality Management Area.

A risk assessment of the potential impacts of the construction phase of the proposed development has been undertaken to identify appropriate mitigation measures. Provided these are implemented, for example through a planning condition, the residual and overall impacts are considered to be not significant.

The report concludes that there is no relevant exposure where the boiler emissions give rise to a potentially significant impact, and therefore the impact is considered to be not significant. Furthermore, the proposed development is air quality neutral in accordance with London Plan Policy 7.14.

Acoustics

An Acoustic Report has been prepared by Hoare Lea which details the environmental noise and vibration survey and assessment in accordance with London Plan policy 7.15 and RBKC Policy CE6.

The report concludes that the cumulative noise emissions from the plant serving the development should not exceed the required levels of 49 dB LAeq,1hr during the daytime and 37 dB LAeq,15min during the night time.

Internal noise levels in accordance with RBKC criteria are predicted to be achievable subject to the inclusion of acoustically rated glazing and a fully mechanical ventilation system. Performance requirements are to be further developed.

Vibration measurements undertaken of local train activity indicates that ground borne vibration levels are significantly below levels at which mitigation would be considered necessary.

Landscaping

Landscape design proposals have been prepared by Briarwood. The submitted document describes and illustrates the proposed landscape designs for the proposed development in liaison with the project architects. The report details the overall concept strategy and commitment to landscaped areas, the key areas of landscaping
and planting and an outline design for each area, showing the proposed planting specification.

6.63 The proposed scheme includes the planting of new trees along Freston Road and a new public realm at the north eastern part of the site which will also be accessible by the ground floor flexible retail units. Additional landscaped areas including the planting of new trees have also been introduced at the south western part of the site.

6.64 The proposed development also includes garden terraces to act as an external break out space for office tenants to enjoy. These areas are accessible from the fifth, sixth, seventh and eighth floors. The addition of general urban greening is in accordance with London Plan Policies 5.10, 5.11 and 7.21 and RBKC Policy CR6 and CE4.

Waste and Recycling

6.65 A Site Waste Management Plan has been prepared by Tier Environmental and seeks to identify the potential mechanisms to improve efficiency and profitability to ensure off-site disposal in accordance with the current guidance and UK Law and to increase environmental awareness during the construction process.

6.66 Suitable waste and recycling storage facilities are located within the basement in accordance with London Plan policy 5.17 and RBKC Policy CE3. Please refer to the Design and Access Statement for more information.

Community Infrastructure Levy and S106 Contributions

6.67 A CIL calculator and S106 calculator have been submitted with this planning application and the likely contributions will be negotiated with RBKC in accordance with Policy C1 ‘Infrastructure Delivery and Planning Obligations’.
7. **Conclusions**

7.1 The proposed development seeks to intensify and optimise the use of this currently underutilised site whilst ensuring that the scheme is both appropriate within its local townscape context and has a beneficial socio-economic and physical impact on the local community and associated Employment Zone. The applicant is committed to delivering the scheme should planning permission be forthcoming.

7.2 The proposed high quality, office-led mixed use development has been designed following various pre-application discussions with the Local Planning Authority, their AAP and the GLA.

7.3 The main benefits of the proposed office led redevelopment scheme are:

- Flexible retail uses at ground floor to provide welcome active frontages onto the enhanced public realm.
- The design of the upper floors and central core design provide maximum flexibility for future tenancy splits.
- Ancillary B1 accommodation within the basement levels include disabled parking, cycle parking and gym facilities for the office.
- The ground floor flexible B1/D1 multi-function space can be used to bring together different tenants within the building.
- Primary frontage on Freston Road, with building designed ‘in the round’ in response to this island site.
- Space provided for maintenance of the TFL railway viaduct.
- Allowance for potential future footbridge, connecting the site with White City Opportunity Area.
- Maximising the quality of the public realm by providing well-landscaped spaces and trees.

7.4 As demonstrated within this report, the proposal is compliant with the Development Plan and other material considerations. The proposal represents sustainable urban development that will deliver significant employment generation for the borough in excess of 800 full time jobs.
## Appendix 1: Existing Tenants Schedule

<table>
<thead>
<tr>
<th>Demise</th>
<th>Occupier</th>
<th>Lease start</th>
<th>Lease expiry</th>
<th>Lease break</th>
<th>Break notice</th>
</tr>
</thead>
<tbody>
<tr>
<td>151 Freston Road</td>
<td>Sixt</td>
<td>26/09/2016</td>
<td>31/12/2018</td>
<td>From 31/03/2018</td>
<td>2 months</td>
</tr>
<tr>
<td>1 Bard Road - Unit 1</td>
<td>S.McCormick</td>
<td>01/03/2016</td>
<td>07/02/2019</td>
<td>Rolling</td>
<td>2 months</td>
</tr>
<tr>
<td>1 Bard Road - Units 2&amp;3</td>
<td>Five Guys</td>
<td>16/05/2016</td>
<td>15/05/2019</td>
<td>Rolling</td>
<td>4 months</td>
</tr>
<tr>
<td>1 Bard Road - Unit 4</td>
<td>Monsoon</td>
<td>26/09/2017</td>
<td>25/09/2019</td>
<td>Rolling</td>
<td>1 month</td>
</tr>
<tr>
<td>149 Freston Road</td>
<td>R.Gomes</td>
<td>01/02/2018</td>
<td>31/01/2019</td>
<td>Rolling</td>
<td>3 months</td>
</tr>
<tr>
<td>151 Freston Road - Units A&amp;B</td>
<td>Vacant</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>151 Freston Road - Units C&amp;D</td>
<td>Me &amp; Em</td>
<td>18/04/2017</td>
<td>17/04/2019</td>
<td>Rolling</td>
<td>3 months</td>
</tr>
<tr>
<td>151 Freston Road - Unit E</td>
<td>SC Studio</td>
<td>22/11/2016</td>
<td>21/11/2021</td>
<td>Rolling</td>
<td>3 months</td>
</tr>
<tr>
<td>151 Freston Road - Unit F</td>
<td>Loaf Beds</td>
<td>14/08/2017</td>
<td>31/01/2019</td>
<td>Rolling</td>
<td>2 months</td>
</tr>
</tbody>
</table>