

# NCP car park, Hammersmith Grove

in the London Borough of Hammersmith & Fulham

planning application no.10/02842/FUL

## Strategic planning application stage 1 referral (new powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

## The proposal

Full planning permission is sought for an office led mixed-use development on the existing NCP car park adjacent to Hammersmith Station. The proposals will comprise two mixed use buildings 11 and 9 storeys. The buildings will provide 31,063 sq.m. office space, 615 sq.m. restaurant and cafe space, 684 sq.m. community space (proposed as a new library) and 718 sq.m. for plant. The redevelopment will provide onsite servicing, 12 vehicle parking spaces, of which two are for disabled users; 257 cycle parking spaces and 10 motorcycle space. A new hard landscaped area of public realm will also be provided.

## The applicant

The applicants are **Development Securities PLC**, and the architect is **BFLS (formerly Hamiltons) Architects**.

## Strategic issues

The application is for similar scale and quantum of development to the extant planning permission from December 2007. The form is more typical of a conventional office building. The strategic issues relate to **design, energy and transport**.

## Recommendation

That Hammersmith & Fulham be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 56 of this report; but that the possible remedies set out in paragraph 58 of this report could address these deficiencies.

## Context

1 On 27 September 2010, the Mayor of London received documents from Hammersmith & Fulham Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 4 November 2010 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1B.1(b) and 1C.1(c) of the Schedule to the Order 2008:

#### Category 1B

*"1. 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—*

*(b) in Central London (other than the City of London) and with a total floorspace of more than 20,000 square metres"*

#### Category 1C

*"1. Development which comprises or includes the erection of a building of one or more of the following descriptions—*

*(c) the building is more than 30 metres high and is 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) (England and Wales) Regulations 1999 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](http://www.london.gov.uk).

### **Site description**

6 The proposal site comprises 0.59 hectares of the existing National Car Parks (NCP) surface parking facility. In addition, a temporary building is located on the site, which provides accommodation for the Hammersmith Community Trust (permanent relocation strategy is being pursued separately). The site is adjacent to the Hammersmith Underground station, which is positioned to the east. A collection of large commercial buildings are positioned to the north and west, and smaller scale buildings including the Station building to the south. Lyric Square lies close by to the south west, across Beadon Road.

7 Lyric Square provides the quickest and most direct link from the site to King Street, the main shopping street within the town centre. Beadon Road is part of the Strategic Road Network and forms part of the one-way system in Hammersmith town centre. The nearest section of Transport for London Road Network (TLRN) is the Hammersmith flyover on the A4, approximately 400 metres to the south of the site. Hammersmith Underground station on the Piccadilly and District Lines and Hammersmith bus station are on the south side of Hammersmith Broadway approximately 200 metres from the site. There are 17 bus routes available from nearby bus stops and the bus station is within 200 metres walk. The site has a public transport accessibility level (PTAL) of 6 (where 1 is low and 6 is high).

## Details of the proposal

8 Full planning permission is sought for an office led mixed-use redevelopment of the existing NCP car park adjacent to Hammersmith Station. The proposals will comprise two mixed use buildings with the following land uses:

Table 1 proposed land uses

landuse	Sq.m.
office	31,063
Restaurant/cafe	615
community	684
plant space	718

9 The redevelopment will provide onsite servicing, 12 vehicle parking spaces, of which two are disabled; 257 cycle parking spaces and 10 motorcycle space. A new hard landscaped area of public realm will also be provided.



Figure 1 proposed development view from Lyric Square (source: design and access statement)

## Case history

10 Pre-application discussion has previously focused on a comprehensive redevelopment of this site, the Station and the site adjacent to the east side of the Station with options for a development that would extend over and above the Station complex. These discussions have not advanced for some time. In November 2007 the former Mayor considered the case (PDU/1654) for a single building of similar quantum of development for a mix of uses including office, retail and cinema. Planning permission was granted in December 2007 and remains extant and

implementable and is therefore a material consideration. Since then the GLA met with the design team in July 2010 where revised proposals were presented. GLA officers advised on matters mainly relating to design and appearance of the building. Other matters regarding transport and energy were also raised.

## Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Urban design *London Plan; PPS1*
- Mix of uses *London Plan*
- Regeneration *London Plan; the Mayor's Economic Development Strategy*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13*
- Retail/town centre uses *London Plan; PPG13, PPS4*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Equal opportunities *London Plan; Planning for Equality and Diversity in Meeting the spatial needs of London's diverse communities SPG; Diversity and Equality in Planning: A good practice guide (ODPM)*
- Culture *London Plan; the Mayor's Culture Strategy*
- Tall buildings/views *London Plan; RPG3A, Revised View Management Framework SPG*
- Sustainable development *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor's Energy Strategy; Mayor's draft Climate Change Mitigation and Adaptation Strategies; Mayor's draft Water Strategy; Sustainable Design and Construction SPG*
- Tourism/leisure *London Plan; Good Practice Guide on Planning for Tourism (DCLG)*
- Historic Environment *London Plan; PPS5*

12 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 2003 Hammersmith & Fulham Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004).

13 The following are also relevant material considerations:

- The draft replacement London Plan, published in October 2009 for consultation.
- The draft submission version Core Strategy (consultation closes on 12 November 2010).

## Regeneration and mix of uses

14 London Plan Policy 2A.7 identifies the proposal site as within an Area for Regeneration. The Mayor has identified these areas to achieve sustained renewal by prioritising such locations for action and investment. The proposed redevelopment of the car park site will provide a key link between the main shopping area of the town centre and the station. Investment and action in this manner is consistent with the broad aspirations of policy 2A.4 and is welcomed in principle.

### Mix of uses

15 London Plan Policy 3B.1 Developing London's economy seeks to promote and encourage a range of premises that can accommodate a mix of different types and size sectors of the economy,

to promote London as one of three world cities. This is underpinned by Policy 3B.2 'Office demand and supply', and paragraph 3.148 which both seek to rejuvenate office activities, the latter in the Central Activities Zone and town centres based office quarters.

16 The mix of uses has changed, albeit only slightly, since the former Mayor's consideration of the case back in November 2007 (see table 2).

Table 2 proposed landuse change from previous permission

Scheme	Office	Restaurant	Retail	Cinema	Library	Plant	Total
2007	39,141	1,537	100	2,392	0	3,725	46,795
2010	31,063	615	0	0	684	811	34,238

17 The proposal remains office led and in strategic terms is supported, as it would make a welcome contribution to the regeneration of Hammersmith town centre. However, it is unfortunate that the retail and leisure uses have been deleted from the approved scheme.

18 Policy HTC7 of the Hammersmith & Fulham UDP identifies the site on the proposals map (site 27) and seeks a mixed use development including shopping, office and community uses (including arts, cultural, entertainment or recreational activities). The emerging core strategy also highlights the site as a development opportunity at paragraph 8.73 of the draft submission version. Here it highlights the extant planning permission and the opportunity to revisit the proposals encouraging further retail and community facilities such as a new library. The Council also seeks development to be linked across the station should the opportunity arise.

19 Part of the previous proposals for a cinema and retail have been dropped, largely due to viability reasons. Instead, the proposal now includes a library. Some of the UDP and emerging core strategy objectives will, therefore, be met in the current offer, although the arts, cultural, entertainment and recreational use objectives and extended shopping function, no longer form part of the proposals which is disappointing in terms of creating a balance of uses that will contribute to the Major Town Centre designation.

20 Notwithstanding the change to the landuse approach, it remains broadly in line with strategic aspirations for office provision in such locations and will contribute to the local community and the town centre function through the mix of uses proposed.

## Design

21 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B, which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to specific issues. London Plan policies 4B.9 and 4B.10, which set out specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the Blue Ribbon network.

22 The draft replacement London Plan reinforces these principles, with new development required to have regard to its context, and reinforce or enhance the character, legibility and permeability of the neighbourhood (Policy 7.1).

## Context and scale

23 The proposals have moved from a single fluid curved structure, which was substantial in form and scale to two individual office blocks, which step down on Beadon Road. The form is typical of a city office block with substantial elements of glazing, an approach that appears to reduce the volume of the structure and responds more sympathetically to the small scale station building.

24 The principal consideration in determining the acceptability of the proposal in design terms is its bearing on the historic assets in the vicinity and specifically whether or not it would harm the setting of nearby listed buildings. The scale of the tiered approach responds to the scale of the station building (locally listed) and the listed George public house. The view from the east is not, however, provided in the documentation, although GLA officers have pre-application indicative illustrations. These views should be provided to establish the verified view. The new design will have less of an impact on the setting given the reduced form and is likely to be less intrusive than the consented proposal. In this case the applicant should provide the range of views of the wider setting as set out in the pre-application material and in the previous submission.

## Layout

25 The location of the community use (the library) has been relocated to the Beadon Road frontage (at pre-application this was located to the rear of the site). The amended location adjacent to the station entrance is fully supported and will be an active and well surveyed area. The public space is welcomed and will define the two buildings through hard and soft landscaping. The pavilion buildings along Beadon Road are not clear, these are shown as 'green roofs' on the groundfloor plan and may well be simply an area of grass. Clarification is required as to what will be constructed along this part of Beadon Road whether it is public realm of actual usable building space. It has the potential to improve the pedestrian environment, however it also has potential to block pedestrian flow and shade restaurant seating areas.

26 London Plan Policy 4B.5 (and draft replacement London Plan policy 7.2) requires proposals for development to meet the highest standards of accessibility and inclusion (not just the minimum building regulation requirements). The layouts appear well considered in terms of movement of persons. Drop off will accommodate disabled users as well as taxi and other commercial users.

## Architecture and materials

27 At present the appearance remains less exciting and inspiring than the previous proposal. A range of options has been considered and the use of colour explored. Whilst the use of materials remains similar to the approved scheme, the design and access statement lacks sufficient views of the building from key local and wider perspectives. These should be provided to be able to assess the appearance of the building in its wider and local context, including, as previously requested, a night view of the proposals.

## **Climate change mitigation**

28 London Plan policies 4A.4 to 4A.7 require the submission of an energy demand assessment along with the adoption of sustainable design and construction, demonstration of how heating and cooling systems have been selected in accordance with the hierarchy and how the development will minimise carbon dioxide emissions, maximise energy efficiencies, prioritise decentralised energy supply, and incorporate renewable energy technologies, with a target of 20% carbon reductions from on-site renewable energy. Chapter 5 of the draft replacement London Plan echoes the policy approach already in the current London Plan.

### Energy efficiency standards

29 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include use of fans with low specific fan power and variable speed drives.

30 Based on the information provided the proposed development does not, however, appear to achieve any carbon savings from energy efficiency alone compared to a 2010 Building Regulations compliant development.

31 Using 2010 Building Regulations compliance software, the applicant should model, and commit to, additional measures that can be adopted to enable the development to exceed 2010 Building Regulations compliance through energy efficiency alone. The applicant should also provide a table comparing the proposed values for energy efficiency parameters to those used in the 2010 Building Regulations Notional Building (rather than the minimum backstop values)

32 The revised annual tonnes of regulated carbon dioxide emissions after energy efficiency measures should be provided.

### District heating

33 The applicant has investigated the potential for connecting to external district heating networks. No networks have been identified in the vicinity. Provision will, however, be made to allow the future connection of the development to district heating should the opportunity arise.

34 The low temperature hot water heat distribution circuits for the buildings will be linked. Each building will, however, be served by its own separate plant room. This is accepted in this instance.

35 The proposed use of electric re-heaters to provide part of the heating demand should be avoided. Instead this element of the space heating should be met by systems compatible with connection to decentralised energy networks, as has been proposed for the main fresh air heating.

### Combined heat and power

36 The feasibility of onsite combined heat and power has been investigated but rejected on technical grounds. Given the relatively small size and intermittent nature of the heat loads, it is accepted that combined heat and power will not be viable in this instance.

### Cooling

37 The facade design has been optimised to reduce solar gain and peak cooling loads. High performance solar control glazing will also be incorporated. Electric chillers will be used to meet the residual cooling loads.

### Renewable energy technologies

38 The applicant has investigated a range of renewable energy technologies and is proposing the installation of photovoltaic panels on the roof. This is estimated to provide a reduction in carbon dioxide emissions of 1.5%. The applicant should clarify the area of photovoltaic panels proposed for the development and demonstrate that the potential for photovoltaic panels will be realised. Through the use of drawings, the applicant should illustrate the roof area that has been

allocated for photovoltaic panels. The reduction in tonnes of annual carbon dioxide emissions from using the panels should be provided.

### Summary

39 The applicant should provide the regulated carbon dioxide emissions after energy efficiency and renewable energy. The applicant should also provide the cumulative annual carbon dioxide savings per annum compared to a 2010 Building Regulations compliant development.

## **Climate change adaptation**

40 The London Plan promotes five principles in policy 4A.9 to promote and support the most effective adaptation to climate change. These are to minimise overheating and contribution to heat island effects, minimise solar gain in summer, contribute to flood risk reductions, including applying sustainable drainage principles, minimise water use and protect and enhance green infrastructure. Specific policies cover overheating, living roofs and walls and water.

41 The proposals will need to improve the reduction in carbon dioxide emissions through energy efficiency measures. Solar shading has been designed into the facade of the to minimise the risks of overheating. Green roofs will be included within the proposals and should be conditioned by Hammersmith & Fulham Council.

## **Transport**

42 The proposed ten parking spaces are within the London Plan maximum standards but it is considered that the site could be car free with the exception of two disabled parking bays, which should be provided as a minimum. The proposed proportion of 20% electric vehicle charging spaces is supported. The proposed 252 cycle parking spaces meets the requirements of the London Plan standards and is therefore acceptable.

43 It is accepted that the trip generation will be less than the consented development, however, a full multi modal trip generation assessment should be provided with the predicted trips in the 'walk and public transport' modal category disaggregated into walking, buses, underground and rail modes.

44 The breakdown of additional bus trips on the local services (including linked trips with the underground) is required in order to determine the impact on bus services and to determine any capacity improvements required and associated financial contributions. The maximum likely contribution to mitigate capacity issues, dependent upon the final figure, would be £90,000 for five years.

45 It is considered that there would not be a noticeable impact on the operation of the Transport for London road network or the strategic road network as a result of the development.

46 Relocation of the bus stops on Hammersmith Grove 20 metres to the south will need to be discussed with London Buses to ensure that an acceptable arrangement is delivered. It is considered that the existing bus stops on Beadon Road outside Hammersmith Underground station should be improved to current accessibility standards.

47 The relocation of the pedestrian crossing on Beadon Road from the west to the east of the Hammersmith Grove access is considered to be appropriate. The design of any 'table top crossing' would need to comply with TfL's Bus Priority Technical Advice Note BP2/05.



48 A work based travel plan should be provided that should be in accordance with the TfL and DfT guidance for travel planning, which should be assessed with the ATTRIBUTE review system to achieve a pass score. The final travel plan should be secured through the section 106 agreement.

49 A delivery and servicing plan is recommended which should seek to rationalise servicing with the aim to reduce the total number of trips made and to avoid critical times on the road network. The delivery and servicing plan should identify efficiency and sustainability measures to be undertaken once developments are operational, including:

- booking systems,
- consolidated or re-timed trips,
- secure, off-street loading and drop-off facilities,
- using operators committed to best practice, demonstrated by membership of TfL's freight operator recognition scheme or similar,
- swept-path analysis demonstrating sufficient access for delivery vehicles.

50 The submission of the delivery and servicing plan should form part of the section 106. The applicant should also commit to the submission of a construction logistics plan, which should seek to minimise highway and traffic impact to the highway network during the course of construction.

51 These plans should be agreed by the Council and TfL and should also include:

- booking systems,
- consolidated or re-timed trips,
- secure, off-street loading and drop-off facilities,
- using operators committed to best practice, demonstrated by membership of TfL's freight operator recognition scheme, or similar.

52 Should this application be granted planning permission, the developer and their representatives are reminded that this does not discharge the requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.

## **Local planning authority's position**

53 The officer recommendation is unknown.

## **Legal considerations**

54 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

55 There are no financial considerations at this stage.

## Conclusion

56 London Plan policies on urban design, access, climate change and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- Urban design (non-compliant): The report identifies some detailed design matters that require further consideration (London Plan policy 4B.1). These include the submission of material identifying the building in the wider setting and clarification regarding the structures fronting Beadon Road.
- Access (compliant): Broadly consistent with the London Plan (policy 4B.5).
- Energy (non-compliant): The approach requires some further work regarding energy efficiency and delivery of renewable energy. (policy 4A.1 and 4A.7).
- Climate change (compliant): Broadly consistent with the London Plan, subject to suitable conditions and further work on energy efficiency (policies 4A.9, 4A.10, 4A.13, 4A.14).
- Transport (non-compliant): The report identifies a number of transport matters that require further consideration. These include further information on the follow:
  - a full multi modal trip generation assessment,
  - breakdown of additional bus trips on the local services (including linked trips with the underground),
  - Relocation of the bus stops requires further discussion with London Buses,
  - The Council should ensure that the applicant commits to a work based travel plan, a delivery and servicing plan and a construction logistics plan.

57 Whilst the application is broadly acceptable in strategic planning terms, on balance, the application does not comply with the London Plan.

58 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan.

- Urban design: Further material should be submitted to illustrate the building in the wider setting and to clarify the structures along Beadon Road.
- Energy: The applicant should respond to the requests regarding energy efficiency and renewable energy.
- Transport: The applicant should respond to the following:
  - a full multi modal trip generation assessment,
  - breakdown of additional bus trips on the local services (including linked trips with the underground),
  - Relocation of the bus stops requires further discussion with London Buses,
  - The Council should ensure that the applicant commits to a work based travel plan, a delivery and servicing plan and a construction logistics plan.

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