

GREATER LONDON AUTHORITY

[REDACTED]
(By email)

Our Ref: MGLA270619-6078

25 July 2019

Dear [REDACTED]

Thank you for your request for information which the GLA received on 27 June 2019. Your request has been dealt with under the Environmental Information Regulations (EIR) 2004

You asked for copies of pre-application planning guidance provided to:

- *A2Dominion (A2D) in respect of their proposed development on Hastings Road, London W13*
- *Thames Valley Metropolitan in respect of their proposed development on Manor Road, London W13*

Our response to your request is as follows:

Please find attached the information you have requested. Please note that some names of members of staff are exempt from disclosure under Regulation 13 (Personal information) of the EIR. This information could potentially identify specific employees and as such constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual.

It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject. It is considered that none of the conditions allow the processing of the information apply in this case as the subjects have not consented to the use of their data for an alternative purpose (namely disclosure under the EIR).

Some further information within the pre-application advice falls under the exception to disclose in Regulation 12 (5)(e) (confidentiality of commercial or industrial information) of the EIR. This information relates to off-market, confidential and are commercially privileged discussions. It is not already in the public domain, nor is it trivial in nature.

Disclosure would cause harm to the legitimate economic interests of A2D. Information Commissioner's guidance states:

'Legitimate economic interests could relate to retaining or improving market position,

ensuring that competitors do not gain access to commercially valuable information, protecting a commercial bargaining position in the context of existing or future negotiations, avoiding commercially significant reputational damage, or avoiding disclosures which would otherwise result in a loss of revenue or income’.

Disclosure would be likely to affect A2D’s commercial negotiating position with third parties. And would inevitably harm the confidential nature of it and therefore the exemption at Regulation 12(5)(e) is engaged in respect of disclosure of the redacted information.

The regulations listed above constitute as qualified exemptions from our duty to disclose information under the EIR, and consideration must be given as to whether the public interest favouring disclosure of the information covered by this exemption outweighs the public interest considerations favouring maintaining the exemption and withholding the information.

The GLA acknowledges that there is a public interest in the activities being undertaken with regards to pre-application discussions and a specific public interest in the transparency of the GLA’s achievement in delivering Mayoral commitments.

However, it is not in the public interest to prejudice third party negotiating position and the request comes at a time where the developer is yet to commence commercial negotiations with contractors.

The principle underpinning the timing of requests in balancing the public interest in nondisclosure was similarly expressed by the Commissioner in his decision on FS50538429. While acknowledging the strong public interest in overall transparency and accountability, he found that on balance the public interest still favoured maintaining the exception:

90. However, in this case, the Commissioner considers there is a stronger public interest in maintaining the exception due to the specific circumstances at the time of the request and the very fact that no commercial negotiations had been entered into between the developer and its own prospective clients

There is a public interest in allowing public authorities to withhold information which if disclosed, would reduce its ability to negotiate or compete in a commercial environment; reputational damage/ loss of customer confidence – disclosure may cause unwarranted reputational damage to a public authority or another organisation whose information it holds, which may in turn damage its commercial interests through loss of trade; ability to generate income; detrimental impact on its other negotiations.

We therefore find that the public interest is therefore balanced in favour of non-disclosure of the redacted information because of the harm its release would cause. If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely


Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

GREATER **LONDON** AUTHORITY
Development, Enterprise and Environment

[REDACTED]
RPS
140 London Wall
London, EC2Y 5DN

Our ref: GLA/5047/01
Date: 19 July 2019

Dear [REDACTED]

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

Site: 41-42 Hastings Road, West Ealing

LB: Ealing

Our reference: GLA/5047/01

Further to the pre-planning application meetings held on 29 May, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely

[REDACTED]

 **John Finlayson**
Head of Development Management

cc [REDACTED] TfL

18 July 2019

41-42 Hastings Road, West Ealing

in the London Borough of Ealing

The proposal

Demolition of all existing buildings and redevelopment of the site to provide up to 175 residential units, up to 335 sq.m of retail floorspace at ground floor, associated landscaping, ancillary facilities (residents gym), car parking and cycling spaces

The applicant

The applicants are **A2Dominion** and the architects are **Red+White**.

Context

1 On 29 May 2019, a pre-planning application meeting to discuss the above proposal for the above site was held at City Hall, with the following attendees:

GLA Group: [REDACTED] - Design Officer
[REDACTED] - Team Leader

LPA: [REDACTED] - LB Ealing

Applicant: [REDACTED] - A2Dominion
[REDACTED] - A2Dominion
[REDACTED] - A2Dominion
[REDACTED] - Red+White Architects
[REDACTED] - Red+White Architects
[REDACTED] - RPS Planning
[REDACTED] - RPS Planning

2 The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

3 The present report should be read in tandem with the initial pre-application report, dated 9 April 2019.

Site description

4 The site is broadly rectangular in shape and is bound by Hastings Road to the south, a parade of one storey retail units to the immediate west with Drayton Green Road beyond, railway lines to the north, which serve both Great Western Railways and TfL rail serves, as well as other buildings to the immediate east. The surrounding land uses are varied: with two to four storey residential uses to the south of the site on Hastings Road and Drayton Green Road; and both commercial and residential uses to the west, including an 8 storey block of flats.

5 The site itself comprises two standalone buildings: a Majestic wine shop, which is set back from the road, with 14 car parking spaces located between the unit and the road; and a Halfords vehicle repair autocentre, with 6 on-site customer parking spaces. To the immediate west of the site, fronting Drayton Green Road, lie a parade of five single storey retail units; these do not fall within the application boundary.

6 At a local level, the site has the following designations: within the Ealing Metropolitan Centre; partially within a Primary Shopping Frontage (Hastings Road); within the West Ealing Business Improvement District; and allocated as site 'EAL 11' in the Development Sites DPD, which states that the site should be redeveloped for mixed-use development that is appropriate for the town centre location. It should be noted that the allocation includes the adjacent parade of single storey retail units to the west of the site.

7 The site is located on the junction of Hastings Road and Drayton Green Road, which form part of the borough road network. The site is located approximately 320 metres north of the A4020 Broadway, which forms part of the Strategic Road Network, whilst the nearest section of the Transport for London Road Network is over 2 kilometres away to the east of the site. The site is located just 100 metres from West Ealing station, served by TfL Rail and national rail services. The station will also be served by Elizabeth Line services once the line becomes operational. The site is served by 2 bus routes running along Drayton Green Lane, whilst a further 6 bus routes run along Broadway to the south of the site. The site benefits from a Public Transport Access Level (PTAL) ranging from 5 at the south of the site (due to proximity to the station and bus stops) to 4 on the east, on a scale of 0-6b, where 6b is highest.

Details of the proposal

8 It is proposed to demolish both existing buildings on the site and redevelop the site to provide up to 175 residential units and up to 335 sq.m of retail floorspace at ground floor.

Strategic planning issues and relevant policies and guidance

9 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises Core Strategy Development Plan Document (2012), Development Sites DPD (2013), Development Management Policies (2013) and the 2016 London Plan (Consolidated with Alterations since 2011).

10 The following are also relevant material considerations:

- The revised National Planning Policy Framework;
- National Planning Practice Guidance; and
- Draft London Plan Consolidated Version of Changes (July 2019), which should be taken into account on the basis explained in the NPPF.

11 The relevant strategic issues and corresponding policies are as follows:

- | | |
|--------------------|---|
| • Town Centre uses | <i>London Plan; Town Centres SPG;</i> |
| • Housing | <i>London Plan; Affordable Housing and Viability SPG;</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG.</i> |
| • Inclusive design | <i>London Plan; Accessible London: achieving an inclusive environment SPG.</i> |

- Sustainable development *London Plan; Sustainable Design and Construction SPG; London Environment Strategy.*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG.*

Summary of meeting discussion

12 Following a presentation of the revisions and updates to the scheme from the applicant team, the meeting discussions covered strategic issues with respect to land uses and urban design. GLA officer advice in respect of these issues is set out within the sections that follow.

Land uses

13 The applicant should refer to the initial pre-application response for commentary on the proposed land uses, as the position had not changed between the initial meeting and response and the present response. The applicant should, however, be cognisant of the draft London Plan Consolidation Version of Changes (July 2019).

Urban design

Layout

14 In response to the GLA's concerns raised at the initial pre-application meeting, the applicant presented two options for the ground floor layout: option 1, which used the applicant's land only; and option 2, which incorporates an additional parcel of land to the site's north (contingent on the applicant acquiring this land). It is welcomed that the applicant has sought to address GLA officers' concerns, through exploring opportunities to improve the ground floor layout and condition, and it is acknowledged that the site is challenging; however, there remain concerns regarding the layout of the scheme.

Relationship with retained retail units

15 [REDACTED]

16 Notwithstanding the GLA's preference that the retail units are included, should they remain outside the application's redline, further consideration needs to be given to the space between the proposed building and the existing retail units. As currently designed, the space is a narrow, potentially hostile alleyway that will be closed off with a gate. GLA officers strongly encourage the applicant to consider a more positive use of this space, through giving it more space and re-designing it as a desirable piece of public realm. There is scope for this to be an inviting and positive public space within the scheme that connects between the existing buildings and proposed building.

17 Furthermore, there are concerns about the relationship between the existing retail units and the proposed development above ground level. As currently shown, balconies are proposed directly above the back of these commercial units, which include fast food outlets. Further consideration needs to be given to the quality of these balconies as amenity space, considering noise or odours that could result in an unpleasant environment. Balconies that are set into the facade should be

considered and creating further distance from the commercial units might improve their future usability.

Ground floor configuration

18

[REDACTED]

19 Within option 1, the applicant has attempted to respond to previous comments by GLA officers, regarding maximising activity along Hastings Road, however, this could be further improved through the creation of a generous residential core. Cycle storage has been given a larger proportion of this facade, which does not provide street activation and could instead be internalised. Moreover, while positive moves have been made to ensure a safe route into the building for cyclists, further consideration should be given in the layout of the ground floor to make sure this route is, not only safe, but also provides an easy and attractive transport option to promote the use of cycling across the scheme.

Upper floors

20 Although some improvements have been made since the initial pre-application meeting, there are still a significant number of single aspect units, including several units that are single aspect, north-facing and overlooking a railway; these are not acceptable and must be removed. Further, opportunities to insert additional aspects to all units should be explored to improve the residential quality of this scheme. Deck access, instead of corridors, would allow for kitchen windows that overlook the shared amenity space on the podium level and improve the residential quality.

21 The internalising of the cores, which was recommended in the initial meeting, has resulted in some improvements to the layout; however, as presented, the floor layout now includes long stretches of narrow corridors with some sharp turns. Further consideration should be given to the configuration to limit these corridors and improve the quality of internal shared spaces within the scheme.

Architecture, Height and Massing

22 The applicant has made some improvements to the rationalisation of the massing and positive moves have been made by the applicant team to improve the facade, with good detail shown for materials by creating a cohesive language throughout the scheme.

23 GLA officers expressed concerns about the quality of the central amenity space. It must be demonstrated that the podium receives sufficient sunlight year-round. The amenity space is crucial to ensuring the quality of the residential elem. If this space is predominantly in shadow throughout the day and year, the scheme's massing should be re-configured to ensure this space is not just usable, but also an attractive feature of the scheme that promotes outdoor activity.

Playspace

24 London Plan Policy 3.6 and draft London Plan Policy S4 require development proposals to make provisions for play and informal recreation based on the expected child population generated by the scheme. The Play and Recreation SPG expects a minimum of 10 sq.m. per child to be provided in new developments.

25 The GLA playspace calculator has recently been refined to better predict the likely child yield of schemes. The applicant should refer to the revised calculator to ensure that sufficient playspace is provided within the scheme. Furthermore, policy S4 of the draft London Plan makes it clear that play space in new residential developments should not be segregated by tenure.

Conclusion

26 As per paragraph 53 of the initial pre-app response, the residential-led redevelopment of the site, providing 175 residential units, including 38% affordable housing is supported in strategic planning terms. It is welcomed that the applicant has sought to explore other options to enhance the ground floor condition and it is acknowledged that the site is challenging; however, there remain significant concerns with the ground floor layout. [REDACTED]
[REDACTED]

27 Given that the follow-up meeting focused solely on design, the applicant should continue to refer to the initial pre-application note for GLA commentary on principle of development, housing, inclusive access, energy and transport and seek to address any concerns with these areas prior to the submission of any application.

for further information contact GLA Planning Unit:

[REDACTED] **Team Leader**
020 7983 [REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)
[REDACTED] **Principal Strategic Planner (Case Officer)**
020 7983 [REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

GREATER **LONDON** AUTHORITY
Development, Enterprise and Environment

[REDACTED]
RPS
140 London Wall
London, EC2Y 5DN

Our ref: GLA/5047/01
Date: 9 April 2019

Dear [REDACTED]

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

Site: 41-42 Hastings Road, West Ealing

LB: Ealing

Our reference: GLA/5047/01

Further to the pre-planning application meetings held on 1 March, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely



John Finlayson
Head of Development Management

cc [REDACTED] TfL

9 April 2019

41-42 Hastings Road, West Ealing

in the London Borough of Ealing

The proposal

Demolition of all existing buildings and redevelopment of the site to provide up to 175 residential units, up to 335 sq.m of retail floorspace at ground floor, associated landscaping, ancillary facilities (residents gym), car parking and cycling spaces

The applicant

The applicants are **A2Dominion** and the architects are **Red+White**.

Context

1 On 1 March 2019, a pre-planning application meeting to discuss the above proposal for the above site was held at City Hall, with the following attendees:

GLA Group: [REDACTED] - Principal Strategic Planner, Case Officer
[REDACTED] - Principal Strategic Planner, Design Officer
[REDACTED] - Team Leader
[REDACTED] TfL City Planning

LPA: [REDACTED] - LB Ealing

Applicant: [REDACTED] - A2Dominion
[REDACTED] - A2Dominion
[REDACTED] - A2Dominion
[REDACTED] - Red+White Architects
[REDACTED] - Red+White Architects
[REDACTED] - RPS Planning
[REDACTED] - RPS Planning
[REDACTED] - WYG Transport
[REDACTED] - WYG Transport

2 The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

Site description

3 The site is broadly rectangular in shape and is bound by Hastings Road to the south, a parade of one storey retail units to the immediate west with Drayton Green Road beyond, railway lines to the north, which serve both Great Western Railways and TfL rail serves, as well as other buildings to the immediate east. The surrounding land uses are varied: with two to four storey

residential uses to the south of the site on Hastings Road and Drayton Green Road; and both commercial and residential uses to the west, including an 8 storey block of flats.

4 The site itself comprises two standalone buildings: a Majestic wine shop, which is set back from the road, with 14 car parking spaces located between the unit and the road; and a Halfords vehicle repair autocentre, with 6 on-site customer parking spaces. To the immediate west of the site, fronting Drayton Green Road, lie a parade of five single storey retail units; these do not fall within the application boundary.

5 At a local level, the site has the following designations: within the Ealing Metropolitan Centre; partially within a Primary Shopping Frontage (Hastings Road); within the West Ealing Business Improvement District; and allocated as site 'EAL 11' in the Development Sites DPD, which states that the site should be redeveloped for mixed-use development that is appropriate for the town centre location. It should be noted that the allocation includes the adjacent parade of single storey retail units to the west of the site.

6 The site is located on the junction of Hastings Road and Drayton Green Road, which form part of the borough road network. The site is located approximately 320 metres north of the A4020 Broadway, which forms part of the Strategic Road Network, whilst the nearest section of the Transport for London Road Network is over 2 kilometres away to the east of the site. The site is located just 100 metres from West Ealing station, served by TfL Rail and national rail services. The station will also be served by Elizabeth Line services once the line becomes operational. The site is served by 2 bus routes running along Drayton Green Lane, whilst a further 6 bus routes run along Broadway to the south of the site. The site benefits from a Public Transport Access Level (PTAL) ranging from 5 at the south of the site (due to proximity to the station and bus stops) to 4 on the east, on a scale of 0-6b, where 6b is highest.

Details of the proposal

7 It is proposed to demolish both existing buildings on the site and redevelop the site to provide up to 175 residential units and up to 335 sq.m of retail floorspace at ground floor.

Strategic planning issues and relevant policies and guidance

8 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises Core Strategy Development Plan Document (2012), Development Sites DPD (2013), Development Management Policies (2013) and the 2016 London Plan (Consolidated with Alterations since 2011).

9 The following are also relevant material considerations:

- The revised National Planning Policy Framework;
- National Planning Practice Guidance; and
- Draft London Plan (consultation draft December 2017, with Minor Suggested Changes in August 2018) which should be taken into account on the basis explained in the NPPF.

10 The relevant strategic issues and corresponding policies are as follows:

- | | |
|--------------------|---|
| • Town Centre uses | <i>London Plan; Town Centres SPG;</i> |
| • Housing | <i>London Plan; Affordable Housing and Viability SPG;</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG.</i> |

- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG.*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; London Environment Strategy.*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG.*

Summary of meeting discussion

11 Following a presentation of the proposed scheme from the applicant team, the meeting discussions covered strategic issues with respect to the following: principle of development; urban design; and transport. GLA officer advice in respect of these issues is set out within the sections that follow.

Principle of development

Housing

12 London Plan Policy 3.3 and draft London Plan Policy H1 seek to increase the supply of housing in the capital. The proposed scheme would provide 175 homes, which equates to 13% of the annual monitoring target for Ealing of 1,297 set out in the London Plan. The increase in the housing targets identified in the draft London Plan evidences the continued need for housing in the borough.

13 The site is located within a Town Centre, benefits from excellent accessibility due to its location next to West Ealing station and is presently under-utilised. As such, the proposed residential-led intensification of the site, to provide up to 175 residential units and 38% affordable housing, is supported in principle, in accordance with the principles of draft London Plan Policy SD6 and London Plan Policy 2.15. Housing is discussed in further detail in paragraphs 20-30.

Commercial uses

14 Both London Plan Policy 2.15 and draft London Plan Policy SD6 recognise that town centres should be the foci for commercial development beyond the CAZ. In terms of retail uses, London Plan Policy 4.7 and draft London Plan Policy SD7 require the scale of retail uses to be related to the size, role and function of the specific town centre, whilst also supporting a proactive approach to improving the quality of retail floorspace. Further, draft London Plan Policy SD8 seeks a range of sizes of commercial units to support the diversity of the town centre. Draft London Plan Policy SD6 states that town centres should also be strengthened to remain the primary location for commercial activity beyond the CAZ as well as a focus for place and local identity. Paragraph 2.6.1B goes on to state that the function and character of high streets should be promoted and enhanced.

15 The site is presently occupied by two commercial uses: the Majestic retail unit; and the Halfords autocentre, which is understood to be sui generis as it functions as a autocentre, rather than a retail unit. In any application, full details of the existing commercial floorspace must be provided, including the size of the Majestic units (both back of house facilities and tradable floor area) and the Halfords unit, as well as the number of existing and proposed employees on the site.

16 It is proposed to provide 335 sq.m of retail floorspace on the site, which is understood to match the tradable area of the existing Majestic retail unit. At the meeting, the applicant

confirmed that there is a commercial agreement in place for Majestic to return to the site, on the basis of retaining their existing tradable area and the retention of five car parking spaces. Subject to confirmation of the existing and proposed commercial floorspace as well as confirmation that the reduction in back-of-house facilities does not impede future use of the retail unit, the retail offer is acceptable. Whilst the loss of the sui generis autocentre does not raise any strategic concerns, the applicant should provide details of its relocation, noting that the jobs will be lost from the Town Centre site.

17 Notwithstanding the comments above regarding the proposed land uses, GLA officers have significant concerns with the proposed ground floor layout as presently designed. The site is within the Ealing Metropolitan Town Centre and Hastings Road is locally designated as a Secondary Shopping Frontage; however, the development introduces a significant quantum of inactive frontage along Hastings Road, with all of the building’s more active uses (including residential entrances, the retail unit and the residents’ gym) located behind the existing retail parade on Drayton Green Road. The applicant must reconsider the ground floor layout, including internalising as much of the servicing and parking as possible and maximising active frontages along Hasting’s Road. The layout as presently designed fails to ensure that the development continues to contribute to the vitality and vibrancy of the Town Centre, as set out in London Plan 4.7, draft London Plan Policy SD6 and draft London Plan Policy SD7.

18 [REDACTED]

Housing

Affordable housing

19 London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 and Policy H6 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. The Mayor’s Affordable Housing and Viability Supplementary Planning Guidance seeks to increase the provision of affordable housing in London and embed affordable housing into land prices. The SPG introduced a threshold approach to viability, which is incorporated within draft London Plan Policy H6; schemes on land that provide 35% affordable housing on site, without public subsidy, and meet the specified tenure mix, as set out in draft London Plan Policy H7, are not required to submit viability information nor be subject to a late stage review.

20 The applicant is proposing to provide 38% affordable housing, comprised of 60% London Affordable Rent and 40% shared ownership, which is strongly supported in principle. In any application, the applicant should provide details of the shared ownership units, noting the

expectation that these are available to households on a range of incomes below the £90,000 threshold. Details of any service charge should also be provided.

21 The applicant is a Registered Provider and are a Strategic Partner of the Mayor as part of his Homes for Londoners Programme 2016-2021. In any application, details of the grant being used in the development must be provided. For the avoidance of doubt, to ensure that the scheme qualifies for the Fast Track route, the applicant must commit to providing at least 35% affordable housing in any S106 agreement without any reference to a 'without grant' fallback offer.

22 In accordance with the Mayor's Affordable Housing & Viability SPG, the S106 agreement must include an early stage viability review mechanism to be triggered if an agreed level of progress on implementation has not been made within two years of any planning permission. If the proposals cannot be assessed under the Fast Track Route, the applicant must provide a Financial Viability Assessment (FVA) and a late stage review will also be required and secured within the S106. A draft of the S106 agreement must be agreed with GLA officers prior to any Stage II referral; example clauses are provided within the Affordable Housing & Viability SPG.

23 The Council must publish any financial viability assessment, submitted to support a planning application, in accordance with the Mayor's Affordable Housing and Viability SPG. GLA officers will ensure that the assessment is made available, to ensure transparency of information.

Housing mix

24 With regard to housing mix, London Plan Policy and draft London Plan Policy H12 state that regard should be had to, inter alia, the range of homes needed, the need to provide mixed and balanced communities, mix of uses within the scheme, the tenure and the location of the site

Unit size	Studio	1-bed	2-bed	3-bed
Market	10	55	48	-
Intermediate	-	16	11	-
Affordable rent	-	16	12	7
Total	10	87	71	7

25 The scheme predominately comprises one and two bedroom units, with 4% being family-sized units and 6% being studios. When considering the affordable tenure only, 10% of dwellings are family-sized. Whilst it is recognised that the site is in a highly accessible location, where predominately one and two bedroom schemes are most appropriate, the applicant should have regard to the draft London Plan SHMA, which indicates that 26% of all affordable dwellings should be family-sized, as well as local policy regarding the provision of family sized units.

Density

26 The London Plan provide a density matrix, which provides guidance on the densities of developments by the PTAL. The draft London Plan is less prescriptive regarding densities and seeks to ensure that sites optimise densities, through taking a site's context and location into account and requiring greater scrutiny on higher density schemes, as set out in part C of the policy.

27 In any application, the density of the scheme by units per hectare and by habitable rooms per hectare should be provided. Where these densities exceed 405 units per hectare (assuming the site's PTAL is 4/5), as set out in part C of draft London Plan Policy D6, the applicant should provide the additional metrics of measurement and a management plan.

Children's playspace

28 London Plan Policy 3.6 and draft London Plan Policy S4 require development proposals to make provisions for play and informal recreation based on the expected child population generated by the scheme. The Play and Recreation SPG expects a minimum of 10 sq.m. per child to be provided in new developments.

29 The applicant should confirm the quantum of playspace proposed in the development and ensure that it complies with the Play and Recreation SPG. All playspace must be appropriately secured and retained in perpetuity, and must be accessible by the occupants of all tenures of housing within the scheme.

Urban design

30 Good design is central to all objectives of the London Plan and draft London Plan. The applicant has engaged positively in the pre-application process, which is welcomed; however, as discussed at the meeting, GLA officers have significant concerns with the design as presently proposed. It is considered that a development would benefit from a further design focused GLA pre-application meeting once the design has been developed further.

Layout

31 The ground floor layout raises significant concerns, as set out above. The southern elevation of the development, which fronts Hastings Road, is dominated by inactive uses, including the building's servicing, parking spaces and a residential core. Whilst the proposed retail unit is accessed from Hastings Road, the entrance is angled towards the corner with Drayton Green Road and essentially turns its back on the rest of Hastings Road. Hastings Road is a locally designated Secondary Shopping Frontage. Not only do the proposals remove the retail uses from the majority of Hastings Road, they also reduce the activity along this elevation. The development's active uses are all located on the western side of the proposed building, behind the retained retail parade. The applicant must re-orientate the ground floor layout to retain and enhance active frontages and uses along Hasting's Road, which could be achieved through pulling the retail unit along Hastings Road, whilst retaining its generous entrance space, and internalising the back of house facilities.

32 [REDACTED]

33 It is understood that there is a level change across the site, with the south of the site sitting below pavement level. The level change could be utilised to 'hide' the back of house facilities, rather than the residents' gym occupying this space. In any application sections should be provided to enable a better understanding of the level changes in this area.

34 It is proposed to provide a podium garden at first floor, with residential uses surrounding it in a 'C' shape. Throughout the development, there are a significant number of single aspect units, including several north facing single aspect units with outlook only onto the railway line; these must be removed and all opportunities to insert additional aspects must be explored. As discussed at the meeting, it is considered that some of these concerns with residential quality could be addressed through internalising the residential cores.

Architecture, height and massing

35 The building is broadly comprised of three components: the section fronting Hasting's Road, which rises to 5 storeys; the 23-storey tower element on the Drayton Green Road elevation; and the block to the rear of the site, which runs parallel to the railway line and rises to 8 storeys. As discussed at the meeting, whilst there are no 'in principle' concerns with the height, the applicant must test the proposals within a TVIA in any application.

36 It is considered that the architecture would benefit from simplification, including standardising balcony angles, the rationalisation of the massing through as a consistent building line on the north and eastern elevations, and ensuring a cohesive façade treatment. Given the retention of the existing retail parade, it is crucial that views and elevations of the development from Drayton Green Road are provided to enable officers to consider the relationship between the development and the retail units.

Inclusive access

37 London Plan Policy 7.2 and draft London Policy D3 require that all new development is accessible and inclusive for all. The application must provide full details of the accessibility within the development, including how level changes are managed.

38 London Plan Policy 3.8 and draft London Plan D5 require that at least 10% of units within new build schemes are wheelchair accessible and the remaining 90% must be wheelchair adaptable. In any application, the positioning of these units must be indicated in plan form. For the avoidance of doubt, wheelchair accessible units should be provided in a range of unit types with a range of outlooks to ensure wheelchair users are afforded the same choice of units as other occupiers.

Sustainable development

39 The applicant must follow the energy hierarchy, in accordance with London Plan Policy 5.9 and draft London Plan Policy S12. Guidance on energy assessments is available on the GLA website, dated October 2018 and provides information on revised targets, taking into account Part L of the Building Regulations and to provide details of the information required within the energy statement.

Transport

40 A Transport Assessment must be provided with any planning application and should contain a robust multi-modal trip generation assessment with public transport disseminated by mode. Subject to this work, and depending on the cumulative development impact, mitigation measures and/or contributions may be required. The applicant should refer to TfL's Transport Assessment Best Practice Guidance when preparing the document.

Car parking

41 The residential element is proposed to be car-free, which is supported in accordance with draft London Plan policy T6.1; however, a total of five car parking spaces are proposed for the retail uses, which fails to accord with the draft London Plan. Draft London Plan Policy T6.3 states that retail developments in areas of PTAL 5 should be car-free (except for disabled persons parking), whilst draft London Plan Policy T6.1 states that 'where sites are redeveloped, existing parking should be reduced to reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy'. It is understood that Majestic's return to the site is predicated on the provision of five car parking spaces; however, any commercial deal between the applicant and Majestic is not a material consideration and the development should accord with policy.

42 Three Blue Badge spaces are proposed for the residential element of the scheme, which falls sort of the five required by the draft London Plan, with the potential for an additional 13 spaces to be identified for the future if demand arises. It is considered that there is capacity to accommodate additional Blue Badge spaces on the site without design amendments through swapping the retail parking for these spaces.

Cycle parking

43 Whilst the submitted plans show a shortfall in cycle parking provision, it is understood from discussions at the meeting that the draft London Plan minimum standards will be met, meaning a total of 306 long stay and 6 short stay spaces should be provided for the residential element. In terms of retail cycle parking, the site is located in an area of higher standards and, therefore, two long stay and 16 short stay spaces should be provided.

44 As presently designed, cyclists must walk through the ground floor internal access road to access cycle parking, with no separation from moving vehicles nor measures to slow vehicles down, which is not considered acceptable, either in policy terms or in light of Vision Zero. As discussed above, the ground floor layout must be reconsidered.

45 All cycle parking should be provided in a safe, secure and easily accessible location and should be designed in accordance with the London Cycling Design Standards, including any lifts. At least 5% of spaces should be able to accommodate larger and adapted cycles.

46 Visitor cycle parking should be provided in a convenient location, close to entrances to the buildings; however, this must not impede the flow of pedestrians nor result in uncoordinated arrangements such that essential cycle parking becomes street clutter. Staff cycle parking must be secure and covered and must provide end of journey facilities (showers, lockers and changing rooms).

Walking, cycling, Healthy Streets and Vision Zero

47 TfL has launched the Healthy Streets approach, which aims to improve air quality, reduce congestion and ensure attractive places to live, work and do business. TfL expects all developments to deliver improvements which support the ten Healthy Streets indicators, as per draft London Plan Policy T2. The development proposals should be assessed against the Healthy Streets indicators in any application to demonstrate the impact of the development and subsequently identify necessary improvements.

48 Vision Zero aims to eliminate death or serious injury on London's roads and supports changes to our road network in order to improve the safety of vulnerable road users. The applicant should identify any improvements in order to reduce the likelihood of an accident within any application and should think innovatively regarding opportunities to make a positive contribution towards achievement of Vision Zero and mitigating the safety impacts of their development.

Servicing

49 It is proposed that all deliveries and servicing will be accommodated on site. Whilst this accords with draft London Plan Policy T7, the arrangement at present introduces a significant amount of inactive frontage into the ground floor and impacts the development's contribution to the wider Town Centre, as discussed above. The applicant must make amendments to the ground floor layout to enhance activity as well as attempt to accommodate servicing within the site's boundary.

50 Any application should be supported by an outline Construction Logistics Plan, produced in accordance with TfL best practice guidance.

Travel Plan

51 A framework Travel Plan should be produced in accordance with the TfL guidance for travel planning. WCC should secure, enforce, monitor, review and ensure the funding of the Full Travel Plan through S106 agreement to ensure conformity with draft London Plan Policy T4.

Mayoral CIL

52 The development will be liable to Mayoral Community Infrastructure Levy 2 (MCIL 2) as well as Ealing CIL.

Conclusion

53 The residential-led redevelopment of the site, providing 175 residential units, including 38% affordable housing is supported in strategic planning terms; however, as presently designed, GLA officers have significant concerns regarding the ground floor layout and the resultant impact upon the vitality and viability of the Town Centre. The applicant must also address issues raised within this note relating to the principle of development, housing, urban design, inclusive access, energy and transport, prior to the submission of any application.

for further information contact GLA Planning Unit:

██████████	Team Leader
██████████	██
██████████	Principal Strategic Planner (Case Officer)
██████████	██

GREATER LONDON AUTHORITY

[REDACTED]
Planning Director
GL Hearn Limited
280 High Holborn
London
WC1V 7EE

Our ref: GLA/4692/01

Date: 16 October 2018

Dear [REDACTED]

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

Site: Manor Road, West Ealing

LB: Ealing

Our reference: GLA/4692/01

Further to the pre-planning application meeting held on 24 July 2018, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely

PP- [REDACTED]
John Finlayson
Head of Development Management

cc [REDACTED] TfL

pre-application report GLA/4692/01

16 October 2018

Manor Road, West Ealing

in the London Borough of Ealing

The proposal

Demolition of all existing buildings and redevelopment to provide a building over basement, ground and 25 storeys comprising 2 units at ground floor in either A1, A2, A3 or D1 uses, and 142 flats over 1st to 25th storeys (54 x 1 bed, 80 x 2 bed and 8 x 3 bed) (100% affordable); with bike and bin stores at basement, with sub-station and ancillary space and private communal amenity space

The applicant

The applicants are **Southern Grove** and **Thames Valley Housing** and the architects are **Brimelow McSweeney**.

Context

1 On 24 July 2018 a pre-planning application meeting to discuss the above proposal for the above site was held at City Hall, with the following attendees:

GLA Group: [REDACTED] - Principal Strategic Planner, case officer
[REDACTED] - Senior Strategic Planner, urban designer
[REDACTED] Team Leader – Special Projects
[REDACTED] - TfL Spatial Planning

LPA: [REDACTED] - LB Ealing
[REDACTED] - LB Ealing

Applicant [REDACTED] - Southern Grove
[REDACTED] - Southern Grove
[REDACTED] - Thames Valley Housing
[REDACTED] - Brimelow McSweeney Architects
[REDACTED] - Brimelow McSweeney Architects
[REDACTED] - Outerspace
[REDACTED] - RPS
[REDACTED] - GL Hearn

2 The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

Site description

3 The 875 sq.m site is bound by Manor Road to the north, Argyle Road to the east and railway tracks, used by both Great Western Railways and TfL rail services, to the south. Immediately

to the site's south lies West Ealing Station and the area to the west of the site will be the new entrance into the station, which is proposed as part of Crossrail. The surrounding land uses are varied: to the immediate north, along Argyle Road, lie commercial and residential uses, predominately within 2 – 4 storey buildings; to the south of the site, beyond the railway lines, lie larger buildings, including an 8 storey residential building, a Waitrose and a Halfords.

4 The site itself contains numerous one or two storey commercial buildings, including an estate agents, a laundrette and a cafe. In addition, there are two residential units on the site. All of the buildings on the site are in a relatively poor state of repair.

5 At a local level, the site is designated as lying within the Ealing Metropolitan Centre, within the West Ealing Business Improvement District and is allocated as site 'EAL 12' in the Development Sites DPD, which states that the site should be redeveloped for a mix of uses that are appropriate to a town centre and compatible with the functioning of the Crossrail station.

6 The nearest London Underground Station is Ealing Broadway, which is located approximately 1 kilometre to the east of the site and is served by the Central and District Line services. The nearest National Rail station is West Ealing, which is located immediately to the south of the site and provides access to Great Western and TfL rail services to London Paddington to the east and Heathrow Airport to the west. The station will also be served by the Elizabeth Line upon its opening. The nearest bus stops are the pair serving the E7 (Ruislip Station – Ealing Broadway) and E11 (Clifton Road, Greenford to Ealing Broadway) located north of the site on Argyle Road, approximately 50 metres away (northbound) and 10 metres away (southbound) respectively. Based on these public transport connections, the site achieves a Public Transport Accessibility Level (PTAL) of 4, where 0 represents the lowest accessibility level and 6 the highest.

Details of the proposal

7 It is proposed to demolish all existing buildings on the site to provide a building over basement, ground and 25 storeys, comprising 142 residential units, all of which are to be affordable, and two commercial units at ground floor (Use Classes A1, A2, A3 or D1).

8 The application is being brought forward as Joint Venture by Southern Grove and Thames Valley Housing, a Registered Provider.

Strategic planning issues and relevant policies and guidance

9 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises Core Strategy Development Plan Document (2012), Development Sites DPD (2013), Development Management Policies (2013) and the 2016 London Plan (Consolidated with Alterations since 2011).

10 The following are also relevant material considerations:

- The revised National Planning Policy Framework;
- National Planning Practice Guidance; and
- Draft London Plan (consultation draft December 2017, with Minor Suggested Changes in August 2018) which should be taken into account on the basis explained in the NPPF.

11 The relevant strategic issues and corresponding policies are as follows:

- Land use principles *London Plan; Town Centres SPG;*
- Housing *London Plan; Affordable Housing and Viability SPG;*

- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG.*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG.*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; London Environment Strategy.*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG.*

Summary of meeting discussion

12 Following a presentation of the proposed scheme from the applicant team, the meeting discussions covered strategic issues with respect to the following: principle of development; urban design; sustainability; and transport. GLA officer advice in respect of these issues is set out within the sections that follow.

Principle of development

13 The site is located within a Town Centre, benefits from excellent accessibility due to its location next to West Ealing station and is presently under-utilised as a series of ad-hoc commercial buildings and two privately-owned residential units. The proposed development would provide 142 residential units, of which 100% are affordable, as well as two small commercial units at ground floor, to be used as Class A1, A2, A3 or D1. As such, the proposed residential-led intensification of the site, with commercial uses to activate the ground floor and contribute to the viability and viability of the town centre, is strongly supported in principle, in accordance with the principles of draft London Plan Policy SD6 and London Plan Policy 2.15.

Housing

14 London Plan Policy 3.3 and draft London Plan Policy H1 seek to increase the supply of housing in the capital. The proposed scheme would provide 142 homes, which equates to 11% of the annual monitoring target for Ealing of 1,297 set out in the London Plan. The increase in the housing targets identified in the draft London Plan evidences the continued need for housing in the borough. The principle of the residential uses on the site is strongly supported, subject to addressing the issues raised within this report

Affordable housing

15 London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 and Policy H6 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. The Mayor's Affordable Housing and Viability Supplementary Planning Guidance seeks to increase the provision of affordable housing in London and embed affordable housing into land prices. The SPG introduced a threshold approach to viability, which is incorporated within draft London Plan Policy H6; schemes on land that provide 35% affordable housing on site, without public subsidy, and meet the specified tenure mix, as set out in draft London Plan Policy H7, are not required to submit viability information nor be subject to a late stage review.

16 The applicant is proposing to provide all 142 units as affordable. All proposed residential units would be at intermediate tenure and comprise 70% London Shared Ownership and 30% London Living Rent. As discussed above, there are two existing residential units on the site, both

of which are in private ownership; as such, the proposals result in the net increase of 140 residential units on the site.

17 Draft London Plan Policy H6 and the Mayor's Affordable Housing and Viability SPG requires that, for schemes to be eligible for the Fast Track route, in addition to meeting the threshold level, they must meet the following tenure mix: 30% affordable rented products; 30% intermediate products; and the final 40% to be agreed with the Council and GLA. There is, however, flexibility in the tenure mix where schemes commit to providing over 75% affordable housing. Paragraph 4.7.13 of the draft London Plan and paragraph 2.42 of the Mayor's Affordable Housing and Viability SPG state that schemes which provide over 75% can achieve the Fast Track route, whatever the tenure mix, provided it is agreed with the Council and Mayor. As discussed at the meeting, whilst Ealing Council planning officers are generally positive about the scheme, it must be confirmed whether Ealing Council supports the 100% intermediate offer. The applicant must address these points to ensure compliance with draft London Plan Policy H7 and the Mayor's Affordable Housing and Viability SPG, and to ensure that they can be considered under the Fast Track route.

18 In any application, the applicant must provide full details of the affordability of the shared ownership units and confirm that all LLR units will not exceed the maximum rental level for the ward. For the avoidance of doubt, all shared ownership units should be available to households on a range of incomes below the threshold and the applicant must also provide details of the management of the communal spaces as well as any service charges. The monthly rental costs for LLR must be inclusive of service charge, in accordance with the Mayor's Housing Strategy.

19 In accordance with the Mayor's Affordable Housing & Viability SPG, the S106 agreement must include an early stage viability review mechanism to be triggered if an agreed level of progress on implementation has not been made within two years of any planning permission. Given the 100% affordable nature of the scheme, any surplus could be used to 'flip' on-site units to affordable rent, or as a payment in lieu for off-site provision. If the proposals cannot be assessed under the Fast Track Route, a late stage review will also be required and secured within the S106. A draft of the S106 agreement must be agreed with GLA officers prior to any Stage II referral; example clauses are provided within the Affordable Housing & Viability SPG.

20 The Council must publish any financial viability assessment, submitted to support a planning application, in accordance with the Mayor's Affordable Housing and Viability SPG. GLA officers will ensure that the assessment is made available, to ensure transparency of information.

Housing mix

21 London Plan Policy 3.8 and draft London Plan Policy H12 encourage a full range of housing choice. Draft London Plan Policy H12 recognises that central or urban sites may be most appropriate for schemes with a significant number of one and two beds, and that the number of family sized affordable homes provided should be driven by local and strategic need.

Unit size	Number
1-bed	54
2-bed	80
3-bed	8
Total	142

Table 1 – Proposed unit mix

22 Given the site's highly accessible location and that the majority of units within the scheme are to be shared ownership and must respond to the affordability constraints, a predominated one and two-bedroom scheme does not raise any strategic planning concerns.

Urban design

23 Good design is central to all objectives of the London Plan and draft London Plan. The applicant has engaged positively in the pre-application process, which is welcomed.

24 The proposed building rises to 25 storeys (plus ground) and is broadly oval, with an 8-storey rectilinear shoulder block on the west of the site, resulting in a larger, idiosyncratic floorplate on the lower floors. Whilst the height of the building does not raise any concerns in principle, the scale of the building is significantly taller than its surroundings and therefore a thorough townscape assessment, with rendered views must be provided in any application to enable officers to assess the impact on the surroundings.

25 The shape of the building results in four curved elements on the building's facade. Noting that a curved building line can be costly to construct and also that the building is to be entirely affordable, GLA officers have some concerns regarding the deliverability of the building as presently designed and how it would look in practice. As GLA officers noted at the meeting, a stepped curve, comprised of numerous linear elements, rather than a true curve, would not produce the intended curved shape. In any application, the applicant should provide thorough details of the facade design. Furthermore, it is considered that the appearance could be improved through some simplification of the facade elements.

26 The large commercial unit on the west of the ground floor responds well to both Manor Road, activating this elevation of the building, as well as the proposed entrance into the Crossrail Station, which lies immediately to the west of the site. Whilst the smaller retail unit activates the eastern side of the building and provides a larger pavement on the corner of Manor Road and Argyle Road, further work is required on the southern elevation to ensure that there is sufficient activation to ensure real and perceived safety. GLA officers consider that elevational plans of the south eastern curved corner of the building may aide in illustrating how this part of the building relates to the wider public realm.

27 As is discussed in further detail in the transport section, GLA officers have concerns regarding the location of the short stay parking and the loading bay as they constrain the pavement width and may result in conflicts between pedestrians and vehicles. The need to limit these conflicts is also specified within the Council's Site Allocation document.

28 The proposed building generally provides good residential quality, with no more than 8 units per core on the lower levels of the building, which have a larger floor plate, and no more than 5 units per core on the upper levels of the building and no north facing units. There are, however, several south-facing single aspect units which look out onto the railway line only. Given the proximity of the railway line, the applicant must demonstrate that these units will still benefit from good levels of residential amenity, including on their balconies, in accordance with the agent of change policy, set out within the draft London Plan.

29 Furthermore, to understand the difference in levels discussed at the pre-application meeting, a section from the railway line to the lower levels of the site must be provided in any application.

Inclusive access

30 London Plan Policy 7.2 and draft London Policy D3 require that all new development is accessible and inclusive for all. The application must provide full details of the accessibility within the workspace, the residential units and the site more widely, as well as how any level changes are managed.

31 London Plan Policy 3.8 and draft London Plan D5 require that at least 10% of units within new build schemes are wheelchair accessible and the remaining 90% must be wheelchair adaptable. To ensure that wheelchair users have a choice of unit sizes, outlooks and layouts, the wheelchair units must be distributed throughout the development. The applicant has indicated their intention to provide 10% of units as wheelchair accessible. In any application, the positioning of these units must be indicated in plan form. For the avoidance of doubt, wheelchair accessible units should be provided in a range of unit types with a range of outlooks to ensure wheelchair users are afforded the same choice of units as other occupiers.

Sustainable development

32 The applicant must follow the energy hierarchy, in accordance with London Plan Policy 5.9 and draft London Plan Policy S12. Guidance on energy assessments is available on the GLA website, dated March 2016 and provides information on revised targets, taking into account Part L of the Building Regulations and to provide details of the information required within the energy statement.

Transport

33 A Transport Assessment must be provided with any planning application and should contain a robust multi-modal trip generation assessment with public transport disseminated by mode. Subject to this work, and depending on the cumulative development impact, mitigation measures and/or contributions may be required. The applicant should refer to TfL's Transport Assessment Best Practice Guidance when preparing the document. In addition, the applicant should provide an audit of both the local pedestrian and cycling environment/routes in order to provide context and evidence base for the proposed public realm works.

34 Insufficient detail has been provided at present to assess whether the proposals for a layby on-street in place of off-street servicing is acceptable. Nevertheless, the proposals would represent a narrowing of the footpath by 50 centimetres, when compared with Ealing's recent public Crossrail-linked improvements. It should be noted that the applicant must provide the widest and best level of service for pedestrians/Crossrail users, as required by draft London Plan Policy T2 and London Plan Policy 6.10. Further work is required on this element and a plan showing the building line set back and footway width must be provided in any application, noting that the layby will be well used and so cannot be considered as contributing to the footway's effective width.

35 Given the constrained location of the site, the intended on-highway servicing and the large flows of pedestrians and cyclists travelling to and from the station, the applicant should provide detailed plans as part of the proposals. To minimise the impact of the development on the highway and especially on the completion/operation of the station during the construction and operational phase, a Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP), which includes details on phasing, must be secured by condition on any planning permission, with the requirement for TfL to be consulted. A Travel Plan would also be required for both uses, to be secured within any section 106 agreement.

36 There will be no residents' parking onsite; this is supported given the good public transport accessibility, which is presently PTAL 4 and will rise to PTAL 5 after Crossrail is launched. Notwithstanding this, it should be noted that draft London Plan Policy T6.1 requires all residential development to provide 3% of dwellings with a Blue Badge parking space and demonstrate how 10% of dwellings in total will have such parking available when required in the future. The applicant should consider how any residents holding a Blue Badge would be able to park their vehicles nearby, noting that the scheme does not provide any specific spaces. A Blue Badge parking occupancy survey of the locality's highways, extending approximately 120 metres north, east and west, should be provided in justification for the proposals. Furthermore, further details are required on the proposed short stay parking, including the number of spaces and whether any of these would be reserved for Blue Badge holders.

37 It is proposed to provide 234 long-stay cycle parking spaces in the basement, which falls short of the draft London Plan standards. Additional spaces should be made available to ensure the scheme complies with the draft London Plan standards. The short-stay cycle spaces are compliant with the draft London Plan, which is supported. All cycle parking should be delivered in accordance with TfL's Cycle Design Standards.

Conclusion

38 The residential-led redevelopment of the site, providing 142 residential units, all of which are to be affordable housing, with two commercial units at ground floor, is strongly supported in strategic planning terms. The applicant must address issues raised within this note relating to commercial development, housing, urban design, inclusive access, energy and transport, prior to the submission of any application.

for further information contact GLA Planning Unit:

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