

# Green Man Lane Estate, West Ealing

in the London Borough of Ealing

planning application nos. P/2010/0418 and 0419

## Strategic planning application stage 1 update report (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

The proposals comprise an outline and a full planning application.

The outline application seeks approval for the redevelopment of the Green Man Lane Estate comprising the demolition of the existing estate (464 homes) and a multi-storey car-park, and the construction of 706 new **flats and houses** together with new roads, parking and open spaces, an energy centre, a gymnasium, cafe, community floorspace and enterprise employment floorspace. The application seeks approval for matters of layout, scale and access, with appearance and landscaping detail to be considered as reserved matters by the Council at a later date.

The full application seeks approval for the first stage of the construction, incorporating an area within the outline application area, and is for the demolition of the multi-storey car park and a housing block (47 homes), and the construction of 154 dwellings in two buildings of three to eight storeys, together with new roads, parking and open spaces, an energy centre, a gymnasium, cafe, community floorspace and enterprise employment floorspace.

### The applicant

The applicant is **A2 Dominion / Rydon Construction**, and the architect is **Conran & Partners**.

### Strategic issues

The principle of a residential-led redevelopment of the estate is acceptable. This is a reiteration of an earlier proposal, about which the Mayor raised concerns regarding the **design**. This amended proposal attempts to address those concerns, and clarify earlier queries regarding the level of **affordable housing** and the housing mix, the **design** including massing of buildings, and the treatment of streets, **transport** and **energy**.

### Recommendation

That Ealing Council be advised that these applications comply with the London Plan, for the reasons set out in paragraph 77 of this report and do not need to be referred back to the Mayor. The Council should, however, take account of the comments made in paragraph 78 of this report.

## Context

1 On 22 February 2010 the Mayor of London received documents from Ealing Council notifying him of planning applications of potential strategic importance to develop the above site for the above uses. The applications were previously considered by the Mayor at his planning meeting of 26 March 2010 (report PDU/2553a/01). Following receipt of the Mayor's comments, the applicant has revised the proposals and submitted these amended applications to the Mayor. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 16 August 2010 to provide the Council with a statement setting out whether he considers that the applications comply 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 applications are referable under Category 1a of the Schedule to the Order 2008: *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*

3 Once Ealing Council has resolved to determine the applications, it is required to refer them back to the Mayor for his decision as to whether to direct refusal; take them over for his own determination; or allow the Council to determine them itself, unless there are no strategic planning issues requiring resolution.

4 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

5 The site contains a modernist-style housing estate, covering an area of approximately 4.6ha, bounded by Singapore Road to the south, Green Man Lane to the east, the rear of homes on Endsleigh Road to the north, and the rear of homes on Eccleston Road to the west. The dwelling types are predominantly flats within linked or detached blocks with heights of up to eight storeys, surrounded by car parks and landscaped open spaces with walking routes.

6 The area of the site that is the subject of the full application is the southeastern corner of the site, which is closest to the town centre facilities of Broadway, but furthest from West Ealing railway station.

7 The A4020 Broadway is located approximately 100m south of the site and is part of the Transport for London Strategic Road Network (SRN). West Ealing mainline rail station is located approximately 600m north-west of the site. The nearest bus stops, approximately 100m away, are located on Broadway and are served by 5 local bus services.

8 The site has a varying public transport accessibility level (PTAL) of between 3 and 4, on a scale of 1 to 6, where 6 is the most accessible. It is recognised that the introduction of Crossrail with the proposed station at West Ealing will result in a significant improvement in the public transport accessibility at the site.

9 Development of various ages and styles surround the site. Facing the site across Singapore Road is the 'rear' of a high street, with access to delivery bays of larger high street stores facing Broadway to the south. A mosque and relatively modern ten-storey building (the Wilkinson building) are also located on this road. To the west and north are predominantly two-storey Victorian terraced houses, with modern two-storey terraced homes in short rows also to the east. To the north-east is a low-rise primary school, while a two-storey locally listed magistrate's court

building is located close to the south-eastern corner of the site. The site is not within the vicinity of any listed buildings or conservation areas.

10 Broadway provides a range of convenience and comparison shopping as well as local services, with an additional centre and supermarket at West Ealing railway station, approximately ten minutes' walk to the north-east of the site.

## Details of the proposal

11 The proposal involves the demolition of all existing estate buildings, which range in height between one and eight storeys, and the provision of 706 new homes as part of a phased redevelopment. The previous development proposed 721 new dwellings. The homes would include a mix of houses and flats across a range of dwelling sizes and tenure, including specific dwellings for older people. The planning applications comprise:

- An outline application for matters of layout, scale and access for the wider site, with appearance and landscaping held as reserved matters; and
- A detailed/full application for phase 1, which comprises homes and community uses on the south-western corner of the site.

12 The development would provide a new street network incorporating restored north-to-south routes, as well as other new vehicular connections. The majority of development would be grouped within three perimeter blocks, each with recreational space in the centre. Smaller scale development would be located around the perimeters of the site, in many places backing onto existing development. Of note is a pedestrian route running through the central block within the outline application component of the plan, connecting the extremities of the south-western and north-eastern corners of the site, terminating in new public squares at either end.

## Case history

13 The applicant presented the scheme to officers at a pre-application meeting in December 2009. As noted in the first paragraph of this report, the Mayor previously considered a version of the current scheme (ref: PDU/2553a/01). The revised proposals have sought to address the issues raised within that report.

14 The previous stage 1 report (ref: PDU/2553a/01) noted that the application did not comply with the London Plan, but that the following changes might remedy the above-mentioned deficiencies, and could possibly lead to the applications becoming compliant with the London Plan:

- **Employment:** The applicant is requested to provide further details regarding their location of the enterprise units, and their justification for inclusion within the scheme
- **Housing:** A viability assessment is required to justify the proposed mix, specifically the provision of family housing.
- **Affordable housing:** A viability assessment is required to justify the proposed tenure split. The provision of additional family accommodation should be investigated.
- **Urban design:** The treatment of the Singapore Road elevations should be revisited for the reasons outlined in paragraph 44 of the report.
- **Transport and parking:** The trip generation modelling should be reviewed according to the methodology outlined within this report, to offer a more accurate assessment of proposed generation rates. Walking routes for phase 1 residents during the construction

stage of subsequent phases should be identified. Further work is required on the monitoring, targets and management of the travel plan.

- **Sustainable development:** Further information should be provided regarding the proposed cooling strategy, information on potential district heating networks, the applicant's carbon dioxide modelling process and photovoltaic panels as described within the energy section above.

## Strategic planning issues and relevant policies and guidance

15 The relevant issues and corresponding policies are as follows:

- Mix of uses *London Plan*
- Regeneration *London Plan; the Mayor's Economic Development Strategy; draft replacement Economic Development Strategy*
- Employment *London Plan; PPS4; Industrial Capacity SPG*
- Housing *London Plan; PPS3; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG, Housing Strategy; Interim Housing SPG*
- Affordable housing *London Plan; PPS3; Housing SPG, Housing Strategy; Interim Housing SPG*
- Density *London Plan; PPS3; Housing SPG; Interim Housing SPG*
- Urban design *London Plan; PPS1*
- Transport *London Plan; the Mayor's Transport Strategy; draft replacement Transport Strategy; PPG13*
- Parking *London Plan; the Mayor's Transport Strategy; PPG13*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Biodiversity *London Plan; the Mayor's Biodiversity Strategy; PPS9*
- Sustainable development *London Plan; PPS1, PPS3; PPG13; PPS22; the Mayor's Energy Strategy; Sustainable Design and Construction SPG*

16 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 2004 Ealing Council Unitary Development Plan, and the London Plan (Consolidated with Alterations since 2004).

17 The following are also relevant material considerations:

- The draft replacement London Plan, published in October 2009 for consultation.
- The Ealing Council Development Strategy (Issues and Options Stage).

## Regeneration / mix of uses

18 The existing estate has a mix of outmoded building types and a range of dwelling sizes that does not meet current needs. 70% of the existing dwellings on the site are one-bedroom dwellings, which will be replaced by mix of dwellings that better reflect the aspirations of the Council and residents. The provision of community uses within the first phase of the scheme is welcomed, as is the regeneration of the estate.

## Employment

19 The provision of enterprise units is welcome. The previous stage 1 report questioned the justification for their inclusion within the scheme. The units will be located above the proposed community cafe and will be run as a community-based resource centre and training facility, rather than a resource that duplicates existing facilities elsewhere in the area. The applicant has provided evidence that this form of complementary business centre has been successfully integrated within similar regeneration schemes. The information submitted demonstrated that the proposal has the capacity to benefit both the existing and future community, and is supported.

## Housing

### Mix of units

20 London Plan Policy 3A.5 requires new development to offer a range of housing choices in terms of the mix of housing sizes and types, taking into account the housing requirements of different groups. In support of this policy, the Mayor's Housing Supplementary Planning Guidance (SPG) seeks to secure family accommodation within residential schemes, particularly within the social rented sector, and sets strategic guidance for councils in assessing their local needs.

21 The housing mix is shown in the following table:

	1-bed flats	2-bed flats	3-bed flats	3-bed houses	4-bed flats	4-bed houses	Total
Phase 1	63	57	26	6	0	2	154
Phase 2	68	71	27	16	0	6	188
Phase 3	82	53	28	13	0	4	180
Phase 4	72	94	17	0	1	0	184
<b>Total</b>	<b>285</b>	<b>275</b>	<b>98</b>	<b>35</b>	<b>1</b>	<b>12</b>	<b>706</b>
% of provision	79% one and two-bedroom flats (40% one-bed, 39% two-bed)		19% three-bedroom homes		2% four-bedroom homes		
			21% family accommodation				

22 Compared with the original scheme, the revised scheme achieves a similar housing mix, incorporating comparable levels of family housing.

23 The high level of one and two bedroom flats partially reflects the need to rehouse existing estate residents who occupy similarly sized dwellings within the current estate. It is understood that this mix reflects local need and borough aspirations, but the London Plan and Housing SPG seek the maximum provision of family-sized accommodation to be provided, setting a target that 30% of all units should be family units. The four-bedroom homes were added following the pre-application discussions between the applicant and officers. Officers have also had the opportunity to analyse the applicant's financial viability analysis. The level of family housing is similar to the level within the original submission of the scheme, and is considered appropriate in the context of the re-provision of the existing housing mix and Ealing Council's aspirations for the area.

## Children's play space

24 Policy 3D .13 of the London Plan sets out that “the Mayor will and the boroughs should ensure developments that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.” Using the methodology within the Mayor’s supplementary planning guidance ‘Providing for Children and Young People’s Play and Informal Recreation’ it is anticipated that the development as originally submitted would yield 406 children within the development. The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. As such the development would have been required to make provision for 4,060 sq.m. of playspace. The amended submission has reduced the number dwellings, and although the mix has altered, the playspace requirement is similar.

25 A detailed play strategy was submitted as part of the original application. This development provides 6,813 sq.m. of play space area across the site, although some of this area is not dedicated play space, meaning that it will be shared with all other occupants of the development. The proposed doorstep play areas will be located in the public realm. There are large recreation and equipped play areas already existing within the vicinity, although they are across the Broadway to the south and the railway to the north. Access to these is constrained by these routes; therefore the provision of appropriate on-site space is supported by officers.

26 Space for youths would be provided within the final phase of the scheme. This space has not been included within the overall play space figure as it is dependent on an upgrade of a portion of the school grounds to a multi-use games area access outside school times. The applicant states that the upgrade of this space is an aspiration of both the developer and the school. The GLA encourages this upgrade at the earliest opportunity, and the applicant’s amended submission notes that the section 106 agreement is likely to contain an enabling mechanism.

27 Play space will be provided from phase 1 of the development, and will comprise a courtyard at podium level, to the rear of the proposed cafe. The applicant’s management plan notes that this space will be accessible to the public at the opening times of the cafe, and to residents at other times.

28 The proposed play strategy is considered to be acceptable. It provides spaces to cater for the needs of users at various stages of childhood, and will be phased throughout the development. The standard of the proposed space is good and represents a marked improvement when compared with the present on-site provision.

## **Affordable housing**

29 London Plan Policy 3A.10 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. Policy 3A.9 states that such targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 35% of housing should be social and 15% intermediate provision, and of the promotion of mixed and balanced communities. In addition, Policy 3A.10 encourages councils to have regard to the need to encourage rather than restrain residential development, and to the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements. Ealing Council has set an overall affordable housing borough target of 50% in its UDP.

30 Policy 3A.10 is supported by paragraph 3.52, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified.

31 Policy 3A.15 of the London Plan resists the loss of housing, including affordable housing, without its planned replacement at existing or higher density. Paragraph 3.75 of the London Plan gives further advice on the Mayor's approach to estate renewal. This approach is carried through to the draft replacement plan in policy 3.13 (B) and paragraph 3.75. More detailed guidance is set out in Section 20 of the Housing SPG. This clarifies that there should be no net loss of affordable housing, which can be calculated on a habitable room basis and should exclude right to buy properties. Replacement affordable housing can be of a different tenure mix where this achieves a better mix of provision. In this instance there is an increase in the overall number of units, and a small net increase in affordable units (ten dwellings). However, the viability information demonstrates that the private residential cannot provide any additional affordable housing, as it is needed to fund the regeneration of the estate.

32 Private housing that forms part of estate renewal schemes need not provide the normal level of additional affordable provision, where this is necessary to cross subsidise redevelopment. In the interests of providing balanced and mixed communities as stated within the London Plan, the GLA will expect a justification of the level of affordable housing and tenure split, using the viability toolkit if necessary.

33 The affordable housing provision across the whole scheme is shown within the following table:

	1-bed flats	2-bed flats	3-bed flats	3-bed houses	4-bed flats	4-bed houses	Total
Market	128	131	38	5	1	2	305
Rented	126	116	56	30	0	10	338
Shared	31	28	4	0	0	0	63
<b>Total</b>	<b>285</b>	<b>275</b>	<b>98</b>	<b>35</b>	<b>1</b>	<b>12</b>	<b>706</b>

34 Of the total provision, 46% will be social rented accommodation, with 11% as intermediate shared ownership (equalling 57% affordable housing within the scheme). Of this, 92 social rented dwellings (60% of phase 1 dwellings) and 49 shared ownership dwellings (32% of phase 1 dwellings) will be delivered in Phase 1.

35 The existing estate is comprised of 464 units. Of these, 391 units are social rent and the remaining 73 are leasehold. The housing mix is 323 one-bedroom flats (70%), 79 two-bedroom flats (17%), 47 three-bedroom flats (10%) and 15 three-bedroom houses (3%).

36 The London Plan housing SPG and the draft housing strategy sets a target that 42% of all social rented units should be family units. As proposed, 28% of social rented units would be family units. The higher number of one and two bedroom units is appropriate given the need for replacement dwellings of this type. Distribution of affordable housing across the site is equitable, with social rented and market housing to be provided in all four phases.

## Tenure split

37 London Plan Policy 3A.9 states that affordable housing targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 35% of housing should be social and 15% intermediate provision, and of the promotion of mixed and balanced communities. While this is equivalent to a split of 70:30, the draft replacement London Plan sets a strategic target split of 60% social rented to 40% intermediate.

38 The proposed tenure mix as presented within the preliminary accommodation schedule indicates that the split would be 85:15, based on dwelling numbers. It is understood that the higher social rented provision is based on the need to replace the existing social rented stock that would be displaced by the new development. However, the proposal does introduce some intermediate housing into an estate where there is currently none. The proposed tenure mix is acceptable.

## **Density**

39 London Plan Policy 3A.3 outlines the need for development proposals to achieve the highest possible intensity of use compatible with local context, the design principles of the compact city, and with public transport accessibility. Table 3A.2 of the London Plan provides guidelines on density in support of policy 3A.3. Given the proximity to the town centre, it would be acceptable to view this as a site with an 'urban' classification within the London Plan density matrix. Table 3A.2 provides a guidance range of up to 170 units per hectare (u/ha) for urban sites with a PTAL rating of '3' (although it is appreciated that the PTAL level would be likely to increase following the introduction of Crossrail services at West Ealing station, with a corresponding density increase of up to 260 u/ha). Policy 3.4 and table 3.2 of the draft replacement London Plan provide similar advice. While the proposal is within the appropriate density range, qualitative factors such as design and response to existing development should also form an assessment of density, in determining an appropriate scale of development. The applicant has recognised this within the design of the scheme, responding to the context by proposing less intensive development towards the north of the site, where the adjoining housing form has a suburban style.

## **Urban design**

40 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, and Chapter 7 of the draft replacement London Plan, include specific design requirements relating to maximising the potential of sites and the quality of new housing provision.

41 Officers undertook a site visit with Ealing Council officers in December 2009. The site is a transitional one; it is located between an area of medium-density, low-rise suburban terraced housing, and a suburban high street. It faces the rear of the high street, where the majority of service access is undertaken, as well as other activity-intensive uses such as a mosque. The architectural quality of the existing estate buildings and layout is poor – the provision of podium access and open undercrofts represents an obsolete style of design, while the open spaces and route network are broken and often have poor surveillance. However the estate does have some design features worthy of preservation or incorporation into a redevelopment; chiefly, the mature trees around the site. Officers are pleased to see that new streets and open spaces have been designed to incorporate existing trees.

## Layout

42 The perimeter block layout is welcomed. The indicative layout appears to promote a clear hierarchy of spaces and distinctions between public and private ownership, and building fronts and backs. There is also a high frequency of ground floor dwelling entrances onto streets, which is welcomed by officers. The proposal relies on corridor or deck access from cores, with a reasonable frequency of cores. The exception to this is the curved section of building facing Singapore Road in phase 1, which relies on lengthy deck access between two corner cores.

43 Officers support the concept of the central east-west route through the estate, and the two squares at either end. The uses at each of the squares are also welcomed. The design acknowledges the two main activity points within the scheme (the school entrance and the mosque) and this should be reflected in treatment of streets and parking. The route 'cuts through' the central block, and the design of the entrances through the buildings should acknowledge that while this is a public route, there is a degree of privacy and 'ownership' that would be welcomed by residents. These entrances will allow visual and light penetration, with surveillance from adjoining flats, and be welcoming to users. Care should be taken in the treatment of the energy centre to provide a frontage that is active and appropriate within this key location.

44 The proposed flats are generally in accordance with the room size standards contained within the draft replacement London Plan (policy 3.5 and table 3.3) and draft Housing Design Guide.

## Height and massing

45 The overall principle of the height strategy, as it has been applied across the site, is supported. This locates the taller buildings close to the high street and the lower buildings close to the homes at the western, and northern edges of the site, responding appropriately to the surrounding context. Internal street widths will be appropriate to their context.

46 Commenting on the previous iteration of the proposal, the Mayor and Deputy Mayor expressed serious concerns about the scale and massing of the proposed buildings along Singapore Road. Particular concerns, as listed within the report (ref: PDU/2553a/01) included the size and overbearing scale of the elevations facing Singapore Road, the articulation of the building through the massing, and the scale of the building when viewed from Broadway, along with the buildings' visual relationship with the town centre.

47 In response, the applicant has revised the massing and scale of the Singapore Road elevations. Specifically, the buildings have been subject to a reduction in height of up to two storeys, the massing has been reviewed to provide a greater level of relief and visual interest, and ground floor uses have been rearranged to better respond to the street pattern. The result is a revised scheme that has a better relationship with the existing townscape, both in terms of views (those from the town centre and along Singapore Road) and appearance. Although the loss of an additional storey on this elevation would probably not harm the development, this massing would have to be located elsewhere within the site, potentially damaging the relationship with existing buildings. The design of the revised scheme is therefore appropriate in the context of the scheme's opportunities and constraints, and will provide a reasonable aspect along Singapore Road.

## Appearance

48 Matters of appearance are reserved, with the exception of phase 1 of the scheme. The contemporary approach to design is supported. The materials used on the elevations along create a 'hard' edge to the rest of the development and are counter-pointed by the softer, internal

facades. Improvements to the massing of the scheme within this revised submission demonstrate that the palette and pattern/repetition of materials would be appropriate.

#### Treatment of streets

49 Officers raised concerns at the pre-application meeting that the street design promoted car parking as the predominant use of space. Although this is not a problem within phase 1 of the scheme, streets within the later phases will have perpendicular parking arranged on both sides of the road. These can sometimes appear as linear car parks, reducing crossing opportunities for pedestrians when compared with 'home zone' treatments, and negatively impacting on this character and residential environments of developments. The hard and soft landscaping detail, which is a reserved matter, will be crucial in ensuring that these layouts are safe and visually attractive, and the Council is urged to ensure that this is handled successfully.

#### Open space strategy

50 The provision of a public squares and a central internal public open space, to be delivered in a future phase, is welcomed. The design of this central space should ensure that it is welcoming to residents and visitors alike, without any detrimental impact on the amenity of residents through noise or invasion of privacy. The high levels of surveillance of spaces from homes within the scheme are strongly supported.

51 The podium space within phase 1 will be located at first floor level above undercroft parking. This space will offer open access for residents, regardless of tenure. The provision of gardens for the houses, and communal gardens for the older people's housing, is welcomed.

## **Transport and parking**

### **Comments from Transport for London**

52 The site has a varying public transport accessibility level (PTAL) of between 3 and 4, on a scale of 1 to 6, where 6 is the most accessible. It is recognised that the introduction of Crossrail with the proposed station at West Ealing will result in a significant improvement in the public transport accessibility at the site.

53 The revised transport assessment includes an updated assessment of trip generation, following on from the advice of Transport for London (TfL) in respect of the previous scheme. The new approach was agreed in principle by TfL; further work has now been undertaken and the revised information submitted as part of this application is much more representative of the size and nature of the development. It is in line with TfL's Transport assessment best practice guidance document, as referenced in London Plan policy 3C.2 *Matching development to transport capacity* and draft replacement London Plan policy 6.2 *Assessing transport capacity*. This application will not have any significant adverse impact on operation of the strategic road network or public transport networks.

54 The materials and size of the shared surface area would be able to safely accommodate both cyclists and pedestrians. The provision of well-designed tactile paving would also ensure the safety of vulnerable pedestrians. The proposed pedestrian routes to be used during construction phase show how residents can continue to access local amenities, including West Ealing station. The plans enable through movement of pedestrians across the site and are considered to be in line with London Plan policy 3C.21 *Improving conditions for walking* and the draft replacement London Plan policy 6.10 *Walking*.

55 754 cycle parking spaces are proposed as part of this development. This is in accordance with the cycle parking standards as referred to in London Plan policy 3C.22 *Improving conditions for cycling* and draft replacement London Plan policy 6.9 *Cycling*. The safety features and design of these spaces are also welcomed, as is the commitment to increase the numbers of people cycling, to and from the site as part of the targets within the travel plan, which will in part be facilitated by well designed facilities.

56 A revised travel plan has been submitted information on measures and monitoring. The travel plan complies with TfL's *Guidance on residential travel planning in London*, as referred to in London Plan policy 3C.2 *Matching development to transport capacity* and draft replacement London Plan policy 6.3 *Assessing transport capacity*. TfL expects the travel plan to be secured, enforced, funded, monitored and reviewed as part of the Section 106 agreement.

57 TfL welcomes the provision of an on-site concierge service to help decrease the chances of repeat deliveries. The provision of off-highway space for deliveries and servicing is also welcomed and the use of car parking bays in off-peak times is acceptable. The provision of both a delivery and servicing plan and a construction method statement detailing the Construction Environmental Management Plan are welcomed. TfL requests that these documents are secured by an appropriate planning condition. This will ensure the application is in general conformity with London Plan policies 3C.17 *Tackling congestion and reducing traffic* and 3C.25 *Freight strategy* and the draft replacement London Plan policy 6.14 *Freight*.

58 In conclusion, TfL considers that the issues raised in respect of the previous scheme have been satisfactorily addressed and TfL raises no objection in principle providing the information and requirements set out above are secured within the planning permission.

## **Access**

59 The development will be 100% Lifetime Homes compliant, with 10% of the total number of dwellings across all phases of the development to be either adapted or adaptable to wheelchair accessible standards. These are well distributed across a range of dwelling types and sizes. Phase 1 includes twelve dwellings.

60 All flatted buildings will contain lifts, with a choice of core access for those dwellings served by corridors and deck access. External areas around the scheme will also be accessible, with suitable gradients. Hard landscape treatment around the site should be developed with accessibility as a design principle – the landscape strategy does not mention this at present.

## **Biodiversity**

61 An ecological survey of the site found that the site's biodiversity is relatively limited as a result of existing development. The layout of the development has been arranged to keep existing mature trees that make a contribution to local biodiversity of bird and bat species. Further bat surveys are recommended by the report.

62 Sedum and biodiverse green roofs will be located on the majority of communal roof space. Additional measures are recommended for inclusion within detailed development, such as additional planting of native species and the installation of nest boxes for birds.

## Sustainable development

63 Officers support the design of sustainable design of dwellings within the within the scheme, all of which have been designed to achieve level four within the Code for Sustainable Homes.

64 Other sustainability measures will incorporate water-saving devices within homes, rainwater collection and grey water recycling. The use of recycled and sustainably sourced timber, local suppliers, and reasonable facilities for residential recycling are supported.

## Energy

65 The applicant has broadly followed the energy hierarchy in Policy 4A.1. Sufficient information has been provided to understand the proposals as a whole and to verify carbon dioxide savings in principle.

### Baseline carbon dioxide emissions

66 Baseline emissions have been calculated using a suitable modelling tool (SAP 2005 for residential elements) and benchmarks and are estimated to be 879 tonnes of CO<sub>2</sub> per year for a Building Regulations 2006 Part L compliant development including non-regulated energy uses. The use of benchmarks for the non-residential elements is accepted considering these represent a relatively small proportion of the development. A summary of the modelling outputs has been provided.

### Energy efficiency standards

67 Energy efficiency and conservation measures are applied beyond those normally incorporated into a 2006 Building Regulations compliant design. This incorporates measures such as thermal insulation and air tightness (which exceed minimum building regulations requirements), and energy efficient lighting. These will achieve a carbon emission reduction of 17% on the regulated emissions. This represents an 11% reduction from the baseline carbon dioxide emissions, which includes regulated and unregulated emissions.

### District heating

68 The applicant has consulted the London Heat map and there are currently no existing district heating networks in the area, although heat mapping of the potential in the borough has been undertaken as part of the DEMAP programme.

69 The applicant is proposing a single on-site energy centre, which will be constructed in phase 1 of the development, and this is shown on drawings supplied with the planning application.

70 The applicant has also investigated, and continues to investigate, the potential for connection of adjacent new and existing developments. While no external connections are proposed at this stage, the applicant's proposed ESCO will review all possible sources of additional revenue outside the development, where such sources of revenue make it feasible to connect the additional load to the energy centre.

### Combined heat and power

71 A 330kWe gas fired CHP is proposed as the lead heat source. This will operate in conjunction with a thermal store. Gas fired boilers will operate to meet the remaining demand. The applicant suggests that CHP savings have been maximised by sizing the CHP to meet a large

portion of the site's heat demand. The cumulative effect of CHP and energy efficiency measures will be a reduction in carbon dioxide emissions of 56% over the baseline.

### Cooling

72 The applicant has submitted information on the approach to cooling. Based on an assessment of a sample of residential units, the risk of overheating has been addressed. The predominant mechanical cooling load will be in the gym and this has been included in the assessment of carbon emissions. Further information on how this, and any other, mechanical cooling loads will be met should be discussed in more detail with Council and GLA energy team.

### Renewable energy technologies

73 The applicant proposes to incorporate 150 sq.m of photovoltaic (PV) panels (50 sq.m. on community cafe and 100 sq.m. on the community centre). This would provide a further 1% carbon reduction to the baseline. The potential for further amounts of PV is constrained by, for example, the available roof area and the use of space for green roofs.

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

74 Ealing Council supports the principle of the estate's regeneration, replacing the present run-down environment with a new-build estate.

## **Legal considerations**

75 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 applications comply 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 draft decisions on the applications, in order that the Mayor may decide whether to allow the draft decisions to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the applications, 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 applications. 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**

76 There are no financial considerations at this stage.

## **Conclusion**

77 London Plan policies on the mix of uses and estate regeneration, employment, housing and affordable housing, density, urban design, transport and parking, biodiversity, access and sustainable development are relevant to these applications. In general, the applications comply with these policies, for the following reasons:

- **Regeneration / mix of uses:** The regeneration of the existing estate and the provision of a mix of uses is supported.
- **Employment:** The provision of enterprise units is welcomed.

- **Housing:** The housing provision and mix and the level of play space to be provided are acceptable.
- **Affordable housing:** The level of affordable housing to be provided is appropriate.
- **Density:** Density is appropriate for an urban location and the design of the proposal is appropriate in providing for this level.
- **Urban design:** The general principles of the design are supported, with improvements to the Singapore Road frontage resulting in an appropriate treatment.
- **Transport and parking:** The revised trip generation figures are appropriate, and the proposal will not result in an unacceptable impact on the strategic road network. Walking, cycling and parking strategies are sound.
- **Access:** The proposal complies with the London Plan.
- **Biodiversity:** The proposal complies with the London Plan.
- **Sustainable development:** The sustainability strategy is supported, and the energy proposals are acceptable in principle.

78 Notwithstanding that the applications comply with the London Plan, they would be improved by the following changes:

- **Urban design / access:** The landscaping strategy is integral to the success of the scheme and should be developed through the reserved matters stage, to implementation, at a high standard. It should also incorporate accessibility as a design principle. The addition of a core within the Singapore Road frontage of phase 1 would shorten the access corridor within this component.
- **Sustainable development:** Further discussion on mechanical cooling loads should be undertaken between the applicant, the GLA and Ealing Council.

79 The Mayor does not need to be consulted again on these applications.

---

for further information, contact Planning Decisions Unit:

**Colin Wilson, Senior Manager - Planning Decisions**

020 7983 4783 email colin.wilson@london.gov.uk

**Justin Carr, Strategic Planning Manager (Development Decisions)**

020 7983 4895 email justin.carr@london.gov.uk

**Glen Rollings, Case Officer**

020 7983 4315 email glen.rollings@london.gov.uk

---