

South Acton Estate Phase 1 (2.3)

Land adjacent to Bollo Bridge Road, All Saints Road and Palmerston Road

in the London Borough of Ealing

planning application no. P/2010/3272

Strategic planning application stage 1 referral (new powers)

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

The proposal

Full planning permission is sought for redevelopment of former Bollo Court and Kipling Tower to contain a residential development of up to nine storeys to contain 167 flats with parking for 53 vehicles, landscaping, amenity space and energy centre.

The applicant

The applicant is **Acton Gardens LLP**, and the architect is **HTA Architects**.

Strategic issues

The principle of the **redevelopment of the estate** is supported, and the reduction in the number of affordable units is acceptable on the basis that it contributes towards a **mixed and balanced** community across the wider estate. Further clarification is required regarding how the **affordable housing level** and **housing mix** were arrived at before it can be agreed that the scheme is compliant with the London Plan.

Further work is also required in relation to **design** and materials, **play space, transport** and **climate change** before the scheme is acceptable with respect to London Plan policy.

Recommendation

That Ealing Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 103 of this report; but that the possible remedies set out in paragraph 105 of this report could address these deficiencies.

Context

1 On 23 August 2010 the Mayor of London received documents from Ealing Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 1 October 2010 to provide the Council with a statement setting

out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 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 application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site is within the South Acton Estate and, until their recent demolition, contained Bollo Court (built in 1949) and Kipling Tower (built in the 1960's). The site is approximately 0.75 ha, and is roughly rectangular, fronting Bollo Bridge Road to the north, Palmerston Road to the west, and All Saints Road to the east.

6 Beyond All Saints Road to the east is a local park, to the north on the opposite side of Bollo Bridge Road is a 5-storey block of flats with ground floor commercial uses. To the west is a seventeen storey 1960's tower block. To the south-west is a series of new buildings that form part of earlier phases of the estate renewal scheme. To the south, there are further new buildings currently under construction with a proposed home zone (which also forms part of the already approved development) separating the sites.

7 The nearest London Underground station is Acton Town, on the Piccadilly Line, which is located approximately 850m away to the west, and a 10 minute walk from the site. The nearest railway station is South Acton, approximately 150m to the south of the site from the site. In addition, the site is served by bus route 440 operating along Bollo Bridge Road, with the nearest bus stop being 150m from the site. The site has a public transport accessibility level of 3, which is moderate.

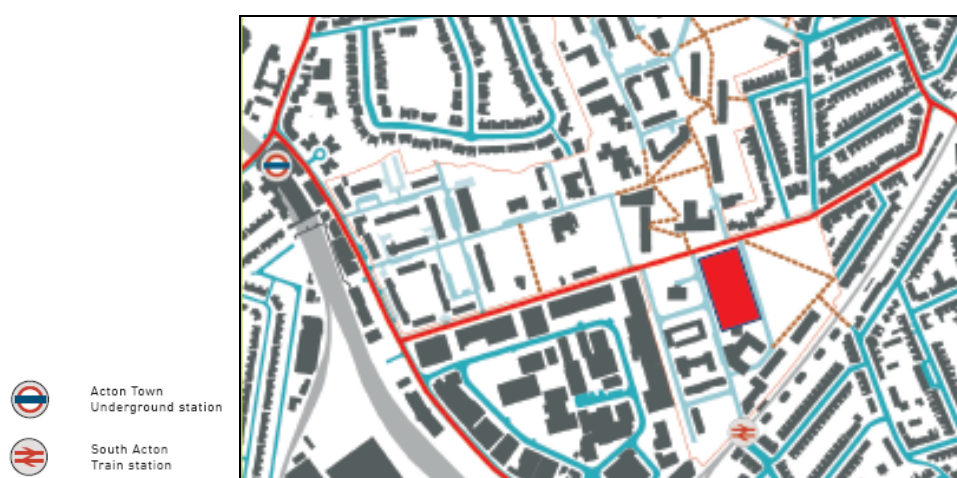


Figure 1: Site location plan (Source: submitted Design and Access Statement)

Details of the proposal

8 The scheme proposes construction of a new perimeter block based development, comprising 167 units. The buildings range in height from three to nine storeys, with a central raised amenity space/deck with 53 parking spaces at ground floor level beneath.

9 The mix of units would comprise 57 one-bed flats, 83 two-bed flats, 19 three-bed flats and 8 four-bed houses. Of these, 68 would be social rented, 19 intermediate, and 80 for private sale.

10 Full planning permission is being sought.



Figure 2: Aerial view of proposed scheme (source: submitted Design and Access Statement)

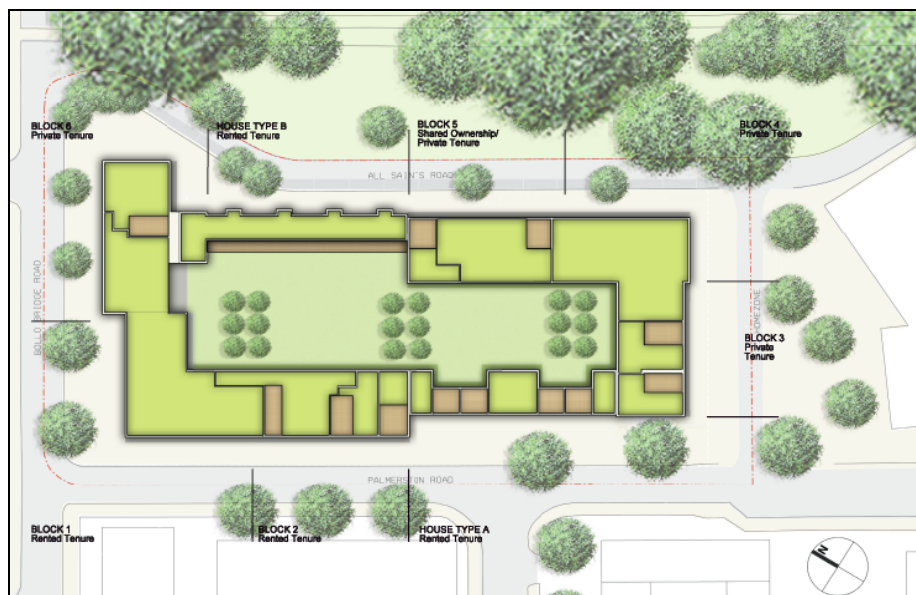


Figure 3: Site layout plan (source: submitted Design and Access Statement)

Case history

11 The applicant carried out pre-application consultation with GLA officers in June 2010. Whilst the scheme was generally found to be acceptable, this was subject to outstanding issues

relating to the design, car park access and landscape design, affordable housing and housing mix being resolved.

12 The redevelopment of South Acton has been running for a number of years. Phase one was formulated as a largely stand-alone scheme following the demolition of Barrie House, which was suffering from serious structural failure. A total of 86 flats and houses were built on the site of the former tower block and garage area by RSL partner, Catalyst Community Housing Association (CCHA).

13 In March 2006 Ealing Council granted outline planning permission for phase two (2.1, 2.2 and 2.3) of the 15-year regeneration programme for the South Acton Estate. This permitted construction of 756 residential units, retail and office space, live work units, community and leisure and industrial uses, together with a maximum of 617 car parking spaces, and included the application site. The previous Mayor provided comments on this application (ref PDU/1069) whereby the proposal was considered to be acceptable in strategic planning terms.

14 Reserved matters application for phases 2.1A, 2.1B and 2.2 were granted pursuant to the outline consent between 2007 and 2009, and a design code for the phase 2 area was approved as part of the discharge of conditions. Approximately 254 affordable flats in six blocks are nearing completion as part of these phases, with works being carried out by Catalyst Housing Group.

15 The current proposals represent phase 2.3 (Blocks I and J), for which the outline consent has expired. With Ealing Council's partnership with Catalyst Housing Group having come to an end, it subsequently embarked on a competitive process to identify a suitable delivery partner for delivery of the remaining Phase 2 development sites, including the application site and to deliver the rest of the wider estate regeneration. The applicant, Acton Gardens, which comprises a consortium including London and Quadrant Housing Association, was selected as the preferred partner. This planning application is being progressed as a stand-alone project in advance of consideration of any future plans for the redevelopment of the wider estate.

Strategic planning issues and relevant policies and guidance

16 The relevant issues and corresponding policies are as follows:

- Regeneration *London Plan; the Mayor's Economic Development Strategy*
- Housing *London Plan; PPS3; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG, Housing Strategy; Interim Housing SPG; Housing SPG EiP draft*
- Affordable housing *London Plan; PPS3; Housing SPG, Housing Strategy; Interim Housing SPG; Housing SPG EiP draft*
- Density *London Plan; PPS3; Housing SPG London Plan; PPS3; Housing SPG; Interim Housing SPG; Housing SPG EiP draft*
- Urban design *London Plan; PPS1*
- Children's play space *London Plan; Providing for Children and Young People's Play and Informal Recreation SPG*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Sustainable development *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor's Energy Strategy; Mayor's draft Climate Change Mitigation and Adaptation Strategies; Mayor's draft Water Strategy; Sustainable Design and Construction SPG*

- Transport/ parking

London Plan; the Mayor's Transport Strategy; PPG13

17 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 Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004).

18 The draft replacement London Plan, published in October 2009 for consultation, and the Ealing Council Development Strategy (Issues and Options Stage) are also material considerations.

Principle of development

19 London Plan policy 2A.7 encourages regeneration in areas where there is substantial deprivation, requiring boroughs to *"set out integrated spatial policies that bring together regeneration, development and transport proposals with improvements in learning and skills, health, safety, access, employment, environment and housing."* This policy is reinforced under policy 2.14 of the draft replacement London Plan.

20 London Plan policy 3A.29 'supporting neighbourhood plans' states *"The Mayor will encourage communities and neighbourhood-based organisations to prepare planning frameworks or neighbourhood plans based upon identifying local economic, social, physical and environmental needs and opportunities to strengthen local Neighbourhood Renewal Strategies"*. The Mayor encourages boroughs to adopt locally prepared frameworks or plans including those prepared by housing association-led estate regeneration schemes, Development Trusts and Urban Regeneration Companies as supplementary planning documents.

21 Ealing Council has been pursuing the regeneration of the South Acton Estate for some years. Significant consultation took place during 2003-04 to develop a masterplan to guide the regeneration of the estate. The aspirations of Ealing Council in undertaking this regeneration scheme in partnership with a housing association, and in consultation with the local community, meets the aspirations of policy 3A.29.

Housing – affordable housing

22 The London Plan, in seeking to increase London's housing supply and maximise the potential of individual sites, focuses on securing housing choice and the maximum reasonable amount of affordable housing (policies 3A.1, 5 and 10). The corresponding policies are set out in Chapter 3 of the draft replacement London Plan.

23 The approach employed by the GLA when assessing estate renewal is to take into account the regeneration benefits to the local community, the proportion of affordable housing in the surrounding area, and the amount of affordable housing being, or planned to be, provided elsewhere in the borough.

24 Policy 3A.15 of the London Plan provides guidance to boroughs preparing DPDs regarding the loss of housing including affordable housing. It states that DPDs should prevent the loss of housing, including affordable housing, without its planned replacements at existing or higher densities. This is re-iterated in policy 3.15 of the draft replacement London Plan, which goes on to state that at least equivalent floorspace should be provided in housing redevelopments.

25 Paragraph 3.75 of the London Plan notes that *"where redevelopment of affordable housing is proposed, it should not be permitted unless it is replaced by better quality accommodation, providing at least an equivalent floorspace."* Section 20 of the Housing SPG provides further guidance on this matter, stating that estate regeneration schemes should be undertaken on the

basis of no net loss of housing or net loss of affordable housing. Paragraph 20.2 of the Housing SPG notes that *“Replacement of social rented units by intermediate provision may be acceptable where this can be justified by a requirement to achieve a wider range of types of provision in a neighbourhood”*.

26 The two buildings which previous existed on the site comprised the following units:

Building	1 bed	2 bed	3 bed	Total	Secure tenant	Right to buy
Bollo Court	0	6	26	32	28	4
Kipling Tower	47	25	23	95	88	7
Total	47	31	49	127		
Habitable rooms	94	93	196	383		

Table 1: existing units on site

28 The proposed scheme is made up of the following:

Unit Type	Unit Tenure			Total by Unit Type	Total by Unit Type (%)	Housing SPG
	Market	Affordable				
		Intermediate	Social			
Studios	0	0	0	0	0%	1%
1-bed	29	7	21	57	34%	31%
2-bed	45	10	29	84	50%	38%
3-bed	6	2	10	18	11%	
4-bed	0	0	8	8	5%	30%
Total by Tenure	80	19	68	167	100%	100%
Total habitable rooms	218	52	217	487		
Total by Tenure (%)	48%	11%	41%	100%		
Tenure split		22%	78%			

Re-provision of affordable housing/tenure split

29 As noted in table 1 above, there were previously 127 homes on the site of which all were social rented units (eleven being right to buy). The scheme proposes 167 housing units, of which 52% would be affordable housing with a 78:22 split between social rented and shared ownership.

30 Excluding the right-to-buy units, which do not count towards affordable units, the proposal results in a decrease of 29 affordable housing units compared to the total number of units in the now demolished buildings, which strictly speaking would fail to accord with London Plan policies (which require at least an equivalent floorspace to be provided in estate renewal schemes). However, in this instance, it is appropriate to consider the scheme as part of the wider estate renewal, in particular the earlier phases of the outline planning permission, completed by Catalyst Housing Group. Here, a total of 254 affordable units have been or will be provided, replacing 84 social housing units. Considering the three phases as a whole, there were originally 212 units, and the replacement schemes together propose 341 units, resulting in an overall net gain of 129 affordable housing units.

31 On this basis, the proposal would aid the delivery of a wider range of housing types in the neighbourhood. It is understood that this approach is supported by Ealing Council, which has required that all social rented units will be re-provided as part of the legal agreement with the applicant for the regeneration of the estate.

32 The introduction of shared ownership units to the scheme is acceptable and in accordance with London Plan policies, which enables the introduction of mixed tenure in estate renewal schemes, so as to provide mixed and balanced communities. It is understood that Ealing Council has identified a high demand for the provision of social units in order to accommodate the decanting of existing tenants from other parts of South Acton estate, thereby enabling future regeneration to take place elsewhere on the estate.

Viability

33 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. The corresponding policies are set out in Chapter 3 of the draft replacement London Plan. Ealing Council in its adopted Unitary Development Plan sets an overall affordable housing borough target of 50%.

34 Policy 3A.10 of the London Plan 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. This is reinforced under policy 3.13 of the draft replacement London Plan.

35 In relation to estate renewal, where private housing is needed to support replacement of affordable housing provision in estate renewal schemes, the net gain in total provision need not achieve the usual proportion of affordable housing provision, where this is necessary to cross subsidise redevelopment. Where this is the case, the applicant is expected to demonstrate that the maximum reasonable amount of affordable housing is being provided by way of an open book appraisal.

36 The scheme proposes 55% affordable housing (based on habitable rooms) with a split of 78:22 between social rented intermediate accommodation. Whilst this level of provision meets Ealing Council's affordable housing targets, in order to comply with the London Plan, it is necessary to demonstrate that the scheme delivers the maximum reasonable amount of affordable housing. In this respect, the applicant has submitted a viability assessment which sets out the costs and revenues for the scheme, which was required as part of its application for grant funding from the Homes and Communities Agency (HCA). The HCA has confirmed that it has scrutinised the appraisal in order to ensure that the scheme delivers value for money and has confirmed that the scheme has secured funding for the 2008/11 programme.

37 At the time of writing, the Council had not confirmed its intentions in terms of scrutiny of the financial appraisal, or whether further section 106 financial obligations would be required (which may impact upon the level of affordable housing). It is also unclear how the delivery of affordable housing on this site will be linked to future phases, if at all. On this basis, before the application is reported back at Stage 2, further discussion with the Council would be appropriate to ensure that the maximum reasonable amount of affordable housing is being secured as part of this and the wider estate renewal, including in relation to any proposed wording within the section 106 agreement.

Mix of units

38 London Plan Policy 3A.5 requires new development to offer a range of housing choices in terms of the mix of unit 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.

39 The scheme proposes a range of unit types, however, the largest number of units proposed are 2-bed flats. The applicant states that the mix reflects the needs of the wider South Acton estate, and that it is based upon careful analysis of the Council's housing register and those who require decanting from existing blocks on the estate that will be demolished. Officers recognise that the offer reflects an increase in the levels of family housing when compared with the previous housing on the site, which is welcomed, however in order to comply with the London Plan and Housing SPG, further discussion is required with the Council before the application is referred back at Stage 2, to establish to what extent the determined mix reflects local needs, noting that only a quarter of the social rented units are 3-bed units or larger.

40 This is also in light of the fact that there is a significant reduction in 3-bed plus units from the previous buildings on the site. Information on the balance of unit sizes over the wider estate would be useful in forming a view on this matter.

Residential quality

41 The Mayor has recently published his draft interim Housing Design Guide and Housing SPG EiP draft. Aspects of this, notably the minimum space standards for dwellings, are also reflected in the draft replacement London Plan.

42 The applicant has provided details of the floor plans for each of the unit types, which shows that all units meet the minimum unit areas set out in the interim Housing Design Guide and the Housing SPG EiP draft. This is welcomed.

43 In terms of amenity space, the rationale of arranging larger family units on ground level to benefit from access to private amenity space, and with their own private entrances off the street, is strongly supported. The houses along All Saints Road will also have rear gardens and individual access into the courtyard. The houses along Palmerston Road will have roof terraces, and most of their living spaces will front onto terraces or the street.

44 The rationale of providing a communal courtyard for the residents is welcomed. Properties at first floor level will have direct access into the courtyard, while all other residents will have secure access via the communal stairways. The concept of providing private roof terraces to all the apartments on the top floor is also welcomed. Whilst some single aspect flats have been included in this block, single aspect north facing units have been avoided. Balconies and windows to this block have been configured to maximise views onto the internal courtyard and green open space, which assists in compensating where there are single aspect units. However it is noted that the majority of the proposed units are of dual aspect, and this is welcomed.

45 At pre-application stage, the applicant was asked to provide a more detailed checklist against the Mayor's draft Housing Design Guide so as to ensure that adequate storage space is provided for instance, in addition to layout and individual room sizes (not just overall unit sizes). In light of the fact that this is a housing association seeking grant funding from the HCA, the applicant should confirm to what extent the scheme meets the other criteria set out in the Mayor's guidance, together with confirmation of how the scheme meets the housing association's and HQL standards. These details should be provided before the application is reported back at Stage 2.

Density

46 Policy 3A.3 of the London Plan aims to maximise the potential of a site taking account of local context, London Plan design principles and public transport capacity. Table 3A.2 of the London Plan provides a framework for assessing density based on habitable rooms and dwellings per hectare. The consultation draft replacement London Plan policy 3.4 and Table 3.2 moves away from 'maximise' to 'optimise' taking into account all those matters in existing policy but with greater emphasis on local context and the design principles set out in Chapter 7 of the draft plan.

47 Paragraph 20.3 of the Housing SPG notes *that "to achieve 100% replacement of demolished social rented units, development at significantly increased density may be necessary to generate sufficient value from market development to support replacement of affordable housing provision or to achieve a mixed and balanced community objective."*

48 The density of the site previously was approximately 510 habitable rooms per hectare. The proposed density of the scheme is 649 habitable rooms per hectare. The site currently has a medium level of public transport accessibility (Level 3) and as such, the density exceeds the density range of 200 – 450 habitable rooms per hectare for this urban setting, as did the previous scheme on the site. It is acknowledged that the London Overground line has improved its services, however, with only a moderate PTAL level, in order for such a high density to be acceptable, the application would need to be exemplary in all other respects and provide a high quality living environment (including adequate provision of amenity space, an appropriate level of affordable housing, a good mix of unit sizes, high quality design and resolution of all transport and climate change issues).

49 It is noted that the previous buildings that occupied the site were of a poor quality. As set out in paragraphs 41 to 43, many aspects of the new scheme are well designed; other aspects are considered below.

Urban design

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

51 The draft replacement London Plan reinforces these principles, with new development required to have regard to its context, and reinforce or enhance the character, legibility and permeability of the neighbourhood (Policy 7.1). In addition, whilst having limited material weight, the interim Housing Design Guide and Housing SPG EiP draft set out principles which should help schemes to demonstrate consistency with London Plan strategic design principles.

Layout, scale, form

52 The scheme features two L-shaped pavilion blocks ranging from 3 to 6 storeys, resting on a 3-storey base, with the remaining spaces filled by two blocks of 3-storey town houses arranged in a linear manner. The approach to layout is acceptable, as is the rationale of introducing a perimeter block configuration to provide a car park at ground level and a podium level landscaped courtyard for the residents. Such an arrangement would help minimise adverse visual impact caused by parked cars, and would help provide well overlooked, legible and well connected places

with clearly defined public spaces and secure private spaces. The private front doors to the family units and communal entrances to the apartments are all arranged around the outside perimeter of the block to create an active frontage, and this is welcomed.

53 The height and massing proposed to the two L-shaped blocks are considered appropriate to their settings. The L-shaped building perimeter block configuration and varying heights are welcomed as this arrangement would allow many of the homes to have views over the open space and the communal courtyard, and also would allow penetration of daylight into the courtyard at different times of the day.

54 Due to the perimeter block layout and the siting of these two blocks, officers recognise the importance of achieving a fluid built form and that detailed design and implementation of the sloping parapet is fundamental in ensuring that this fluidity is achieved. Revisions have been made to the parapets since pre-application stage, to show a more stepped approach, however it will be important to ensure that the overall built form does not appear bulky, and sufficiently relates to its context. In this respect, the applicant is in the process of preparing computer-generated images (CGI's) to support this architectural approach. Further details on window configuration would also be welcomed, given the current sketch nature of the images, and whether any variation to the symmetrical built form could be achieved to enliven the elevations. Further discussion and review of documents with the architect would be welcomed before the application is reported back at Stage 2 in order to address these points.

Materials

55 In terms of materials, the scheme proposes a buff London stock brick as the primary material and this is supported, as it provides a sense of solidity and longevity, emulating the local character of the tree-lined streets with brick properties. However, officers are not convinced about the combination of this brick and the white uPVC window reveals as this could compromise the overall appearance of the elevation. The architect is asked to consider dark grey power coated aluminium window frames for the entire scheme. The computer generated images of the scheme may further aid officers in assessing the overall quality of the elevations. Further information, including details of materials should be provided before the application is reported at Stage 2, in order to allow officers to assess the quality of the materials and their appearance when applied in combination.

56 The rationale of applying the lime colour to the balconies is welcomed, as it would help create a fresh image for the proposed development.

Town houses

57 The scheme incorporates a section of 3-storey town houses within the building envelope. This proposed height is considered acceptable and appropriate to their setting. The design of the town houses is of good quality, the compositions are visually pleasing and the elevations will feature vertical rhythm, setbacks, porches and roof terraces to add interest to the streetscape.

58 All the units will have front doors facing the main streets to support an active street frontage. The proposed layout has been carefully designed to enhance the penetration of daylight into the private courtyard spaces.

59 The rationale of providing varied amenity to the town houses to meet the different needs of the residents is strongly supported, in addition to courtyards, balconies, front gardens and roof terraces, all the units will also have access to the communal amenity space.

Landscaping

60 The landscaping is of good quality, comprising native tree species with light canopies in large colourful pots to enhance the setting of the podium courtyard. In terms of planting, wall climbers and boundary hedges will also be introduced to the courtyard to provide seasonal variation, colour and year round interest.

61 The submitted information suggests that lighting and long benches will be incorporated into the scheme, with effect lighting to highlight certain features in the courtyard. However, it is not clear where these lighting and furniture will be located. Further details relating to this area should be secured by way of condition, in association with detailed landscaping requirements.

62 The retention of trees along Bollo Bridge Road is supported as this would help create a green gateway to the development and complement the established trees in the adjacent recreation ground.

Parking

63 As noted above, the rationale of locating the car park at ground level and enclosed it by the perimeter block layout is supported, as this arrangement would help minimise potential adverse visual impact of parked cars. However, it is not clear if there is an access control to secure the car park, details of which should be confirmed by way of condition.

64 To summarise, there are outstanding issues related the design of area beneath the sloping parapet, elevational treatment, car park access and landscape design. On this basis, further revisions should be made to ensure that the new residential scheme would maximize the site's potential and sit well within the local area, in order to comply with London Plan design policies.

Access and inclusive design

65 London Plan policy 4B.5 and the corresponding draft replacement London Plan policy 7.2 seek to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum), and this and all developments should seek to better minimum access requirements. Policy 3A.5 requires that 10% of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. Design and access statements should explain the design thinking behind the application and demonstrate how the principles of inclusive design, including the specific access needs of people with disabilities, have been integrated into the proposed development and how inclusion will be maintained and managed.

66 The applicant has committed to ensuring that all of the housing is designed to Lifetime Homes Standards, and an example layout has been provided to show how the sixteen principles have been met. The accommodation schedule indicates that 16 of the units would be wheelchair accessible, of which six would be purpose built wheelchair flats and ten would be wheelchair adaptable flats. The wheelchair housing would be allocated across tenures and mixes, which is welcomed. Lift access is provided to all floors and there would be ten blue badge parking spaces provided within the car park. All entrances have level thresholds, canopy or recessed coverings, and door widths are suitably sized. Ealing Council should secure these commitments by way of condition.

67 In terms of the external environment, the applicant's landscaping strategy confirms that the communal courtyard has been designed with a perimeter circulation path and three large spaces that are accessible for all. Access to and from the cores will also be full accessible. The car park, homezone and All Saints Road provide parking spaces in close proximity to the ground floor houses, flats and core entries. Ealing Council will need to ensure that the detailed design of the

home zone routes and shared spaces are fully inclusive, paying attention to the needs of visually impaired people.

Children's play space

68 Policy 3D.13 of the London Plan and policy 3.6 of the draft replacement 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 there will be approximately 70 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 should make provision for 700 sq.m. of playspace, of which approximately 250 sq.m. should be provided on-site for under 5 year olds.

69 The application documentation includes a play strategy, which assesses the child yield of the development and existing local play provision in accordance with the Mayor's SPG. In relation to door-stop play, it is intended that the entire central communal courtyard of 1000 sq.m. be designed as a playable landscape, with undulating lawns. No fixed play equipment is proposed. The applicant states that the approach responds to resident consultation, with concerns raised about dedicated play equipment in close proximity to dwellings facing into the courtyard, and potential for noise disturbance. The applicant confirms that the existing recreation and formal play area, adjacent to the site, some five minutes walk away will provide such facilities for the scheme.

70 It is acknowledged that the central courtyard is restricted by virtue of its dimensions and proximity to habitable windows, and the applicant has committed to ensuring that the communal space is designed as a playable and exciting landscape, with examples provided of how this might be achieved. In accepting this approach, it will be important to ensure that a high quality, creative and useable landscape is provided within this courtyard space, and as such, full details of the landscaping of this space should be secured by way of condition of any planning permission.

71 The close proximity to the adjoining park is such that it would provide a useful amenity space for residents of the scheme, however further discussion is required with the Council before the scheme is reported back at Stage 2 in order to establish whether this space is adequate to cater for the needs of existing and future residents, including active play equipment for children of all age ranges and abilities, including the requirement for any financial contributions towards its improvement.

Sustainable development

72 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies with a target of 20% carbon reductions from on-site renewable energy. The policies set out ways in which developers must address mitigation of, and adaptation to, the effects of climate change. The corresponding policies within the draft replacement London Plan are set out in chapter 5.

Climate change mitigation

73 Policies 4A.2 to 4A.8 of the London Plan focus specifically on how to mitigate climate change, and the carbon dioxide emissions reduction targets that are necessary across London to achieve this. Developments are required to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions (be lean), adopting sustainable design and construction measures and prioritising decentralised energy (be clean), including renewables (be green).

Baseline carbon dioxide emissions

74 The combined regulated and unregulated carbon dioxide emissions of the proposed development, based on a 2006 Building Regulations compliant development, have been estimated to be 395 tonnes of carbon dioxide per annum.

75 The applicant should separate the total emissions into regulated and unregulated annual tonnes of carbon dioxide emissions and provide these figures at each stage of the energy hierarchy.

Energy efficiency standards

76 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum requirements set by building regulations. Other features include reducing thermal bridging, installing low energy light fittings and use of A-rated appliances.

77 The development is estimated to emit 376 tonnes of total carbon dioxide emissions per annum after the application of passive design and energy efficiency measures. A reduction in regulated carbon dioxide emissions of 11.9% compared to the Target Emissions Rate of a 2006 Building Regulations compliant development will be achieved through this first element of the energy hierarchy. On a whole energy basis, a 5% reduction in emissions is achieved through energy efficiency.

78 Best practice suggests that up to 25% carbon dioxide savings can be achieved through energy efficiency measures alone in similar developments. The applicant is asked to investigate where additional savings can be secured.

79 The applicant should provide a table comparing the assumed values for energy efficiency parameters, e.g. U values, air permeability, etc. to the 2010 Building Regulations Notional Building.

District heating

80 The applicant has identified the opportunity of connecting to the small network to the south-west of the proposed scheme operated by Catalyst Housing Group. The applicant should continue to prioritise connection to this network where possible and should provide details of correspondence with Catalyst Housing Group to support their energy strategy.

81 A 256 sq.m. stand-alone energy centre will serve the development and will have sufficient space for plant to serve three further phases and for heat exchangers to allow connection to a district heating scheme should one become available in future. This minimum size of energy centre should be secured through condition.

Combined Heat and Power

82 Due to the uncertainty surrounding connection to the Catalyst Housing Group network, the applicant proposes that the centralised heating system be fed by a 15kWe CHP unit supplying 25% of the heating load and meeting 80% of the electrical loads on the landlords supply for Phase 1.

83 A further reduction in total carbon dioxide emissions of 7% will be achieved through this second part of the energy hierarchy.

Cooling

84 The applicant states that dark blinds coupled with mechanical extract ventilation, with a summer boost where required, will allow effective nighttime ventilation in summer months.

85 The applicant should provide further details of the cooling strategy which sets out measures that aim to minimise the need for active cooling systems.

Renewable energy technologies

86 The applicant has initially considered inclusion of a 500kW biomass boiler. If this option were to be pursued, further information on the proposed biomass boilers as specified in the GLA energy guidance would be required, for consideration in terms of air quality. Clarification on this point should be provided.

87 A total of 56kWp of photovoltaic energy is proposed. The applicant should submit drawings showing the amount of roof that is available within the development and that could be used to install photovoltaic panels with suitable orientation and free of shading. An estimate of the electricity and carbon dioxide savings that may be realised through the use of this technology alone should also be provided.

Climate change adaptation

88 The London Plan promotes five principles in Policy 4A.9 to promote and support the most effective adaptation to climate change. These are to minimise overheating and contribute to heat island effects; minimise solar gain in summer; contribute to flood risk reduction, including applying sustainable drainage; minimising water use; and protect and enhance green infrastructure (the corresponding draft replacement London Plan policy is policy 5.3). There are specific policies covering overheating, living roofs and water. Further guidance on these policies is given in the Mayor's SPG Sustainable Design and Construction.

89 Policy 4A.11 and draft London Plan policy 5.11 seek major developments to incorporate living roofs and walls where feasible. Policy 4A.14 of the London Plan and Policy 5.13 of the draft replacement plan seek to ensure that surface water run-off is managed as close to its source as possible and sets out a hierarchy of preferred measures to achieve this. Policy 4A.16 of the London Plan and policy 5.15 of the draft replacement plan seek to ensure that new development has proper regard to the impacts on water demand and existing capacity by minimising the use of treated water and maximising rainwater harvesting.

90 The applicant has submitted a sustainability statement, which includes an assessment against the Mayor's essential standards. The applicant states that it is intended that all affordable homes be designed to meet Code for Sustainable Homes Level 4, and a high-end Level 3 rating will be sought for the private dwellings. Low water use sanitary-ware and fittings will be specified in order to meet target water consumption levels, and SUDS measures include green roofs, water

butts and rainwater harvesting to ensure the peak rate of run-off remains unchanged pre and post development. Ealing Council should secure these commitments as part of any planning permission.

Transport for London comments

91 A total 75 car parking spaces have been proposed, of which twelve will be provided to disabled standards. Given the public transport accessibility level of 3 and its outer London location this provision, an equivalent ratio of 0.45 parking spaces / unit, is reasonable. The on-site car parking should be provided with electric vehicle charging points in line with draft replacement London Plan policy 6.13 'Parking' which states that 20% of all residential spaces must have active charging points, with an additional 20% having a passive charging provision. These details should be secured by way of condition of any planning permission.

92 There are no pedestrian crossing facilities on Palmerston Road to the west of the site, All Saints Road to the east of the site or Bollo Bridge Road to the east. As these are key access routes to stops serving bus route 440, the applicant is requested to enter into discussion with TfL and the Council before the application is reported back at Stage 2, in order to address this deficiency. In addition, there will be a need to include signage for walking and cyclists to the local stations and to local amenities. These improvements will ensure general conformity with London Plan policy 3C.21 'Improving conditions for walking' and draft replacement London Plan policy 6.10 'Walking'.

93 A detailed assessment is required in relation to the accessibility levels of the nearest bus stops in each direction, with any deficiencies identified need to be addressed through an appropriate section 106 contribution. This will ensure general compliance with draft replacement London Plan policy 6.7 'Buses, bus transits, trams'.

94 There are concerns in relation to the multi-modal trip generation figures quoted, in particular the high proportion of walking trips, and on this basis, the multi-modal trip generation should be revised using the TRAVL database with a more accurate walking modal share. It is, however, acknowledged that the overall trips generated by the development is still low and will be unlikely to have a noticeable impact on the local transport modes.

95 In terms of the design of the scheme itself, with respect to the main access route to the undercroft car park from Palmerston Road, there is a concern that this does not include any footways for pedestrian access to the car park. An updated plan which shows the inclusion of footways on both sides of the entrance ramp should therefore be provided before the application is reported back at Stage 2.

96 There are also concerns over the arrangement of the disabled parking and the positioning of entrances to the building. Currently the arrangements require access through the designated disabled parking spaces and their surrounding accessibility zones. Whilst the disabled parking should be in close proximity to the access routes, a clear pedestrian route, separate from disabled parking spaces, should be provided, details of which should be provided before the application is reported back at Stage 2.

97 A total of seven dedicated cycle storage rooms are proposed at ground floor level. In addition to being safe, covered and secure, these should provide good lighting and CCTV. It is also recommended that additional cycle storage is made available for visitor usage. These recommendations will ensure general conformity with London Plan policy 3C.22 'Improving conditions for cycling' and draft replacement London Plan policy 6.9 'Cycling'.

98 In accordance with London Plan policy 3C.25 'Freight strategy', and draft replacement London Plan policy 6.14 'Freight', the development would be expected to be supported by a

construction logistics plan (CLP) and delivery and servicing plan (DSP), both of which should be secured by way of condition.

99 It is acknowledged that the travel plan has passed the ATTrBuTE assessment, however, there are several elements that must be included before it is deemed acceptable by TfL. The travel plan assessment, which identifies required improvements, will be forwarded to the applicant. The travel plan must be secured, enforced, monitored, reviewed and funded through the section 106 agreement.

100 In conclusion, while TfL is satisfied that the proposed development is unlikely to have a negative impact on either the public transport or the strategic highway network, additional information, as detailed above, is required to confirm that it complies with all of the transport policies of the London Plan.

Local planning authority's position

101 It is understood that Ealing Council will be reporting the application to a planning committee meeting in early November with a recommendation that planning permission be granted.

Legal considerations

102 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

103 There are no financial considerations at this stage.

Conclusion

104 London Plan policies on estate renewal, housing, density, urban design, access, child play space, sustainable development, and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Principle of development:** The principle of estate renewal with an increased housing provision is supported by London Plan policy.
- **Housing:** The reduction in affordable housing levels, together with the introduction of intermediate housing are acceptable when considered in relation to the proportion of affordable housing in the surrounding area. Further information is required to demonstrate that this and future schemes will provide the maximum reasonable amount of affordable housing, and that an appropriate housing mix will be achieved in order to comply with the London Plan.

- **Standard of residential accommodation:** The applicant has committed to providing a satisfactory residential environment for its occupiers in terms of size and layout of the units, however further information is required in order to demonstrate that the scheme complies with London Plan policies.
- **Density:** The proposed residential density exceeds the guidance range for this location. However, the scheme of generally high quality and this density is considered acceptable.
- **Urban design:** The proposal is broadly consistent with the design principles of the London Plan, subject to further clarification and information.
- **Children's play space:** A play strategy has been submitted, however further clarification and details are required to demonstrate that the scheme complies with London Plan policy 3D.13 and relevant planning guidance.
- **Inclusive design:** The applicant has committed to meeting Lifetime Homes standards, together with provision of 10% wheelchair accessible units. Sufficient detail has been provided in relation to the location and layout of the wheelchair accessible units and the quality of the landscaping to ensure compliance with London Plan policies 3A.5 and 4B.5, details of which should be secured by way of condition.
- **Climate change mitigation and adaptation:** The applicant has broadly followed the energy hierarchy in Policy 4A.1 and considered the Mayor's SPG on sustainable design and construction. Sufficient information has been provided to understand the proposals as a whole and to verify carbon dioxide savings in principle, subject to clarification and further information.
- **Transport:** The scheme is broadly acceptable from a transport and parking perspective subject to clarification and further information being provided.

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

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

- **Housing:** Further discussion with the Council is required before the scheme is reported back at Stage 2, so as to ensure that the maximum reasonable amount of affordable housing is being secured, and how the scheme is to be linked with future phases.
- **Standard of residential accommodation:** Details of how the layout of the flats meet relevant space standards should be provided before the application is reported back at Stage 2.
- **Urban design:** Further information and discussion is required before the scheme is reported back at Stage 2, in relation to the elevation treatment and car park access
- **Children's play space:** Further discussion and information is required in relation to the proposed approach to play space provision and an assurance that nearby parks have sufficient capacity for this and recently constructed schemes in the vicinity.
- **Sustainable development:** Further information is required in relation to additional energy efficiency savings and energy efficiency parameters, district heating, the proposed cooling

strategy and roof space for PV panels, as described in the climate change mitigation section above. The measures proposed here, and in relation to climate change adaptation (including green roofs) would need to be secured by way of condition or section 106 planning obligation.

- **Transport:** Further information is required as detailed in the body of the report, before the scheme is reported back at Stage 2, details of which should be secured by way of condition or section 106 planning obligation.

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

Samantha Wells, Case Officer

020 7983 4266 email samantha.wells@london.gov.uk
