

South Acton Estate Phase One (2.3)

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

in the London Borough of Ealing

planning application no. P/2010/4201

Strategic planning application stage II 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 comprising a residential development of up to nine storeys to contain 167 units 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 redevelopment of the part of the South Acton Estate is a significant opportunity to replace and add to the housing stock to provide a balanced and mixed community, and is acceptable in strategic planning terms.

Key strategic issues regarding design, play space, inclusive design, climate change, and transport have been satisfactorily resolved, and suitable conditions imposed, such that the scheme can be considered to be compliant with London Plan policies.

The Council's decision

In this instance Ealing Council has resolved to grant permission.

Recommendation

That Ealing Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1 On 26 October 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. This was referred to the Mayor 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.”*

2 On 30 November 2010 the Mayor considered planning report PDU/2642a/01, and subsequently advised Ealing Council that the application did not comply with the London Plan, for the reasons set out in paragraph 101 of the above-mentioned report but that the possible remedies set out in paragraph 103 of that report could address these deficiencies.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. On 15 December 2010 Ealing Council decided that it was minded to grant planning permission, and on 4 January 2011 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Council under Article 6 to refuse the application or issue a direction to Ealing Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application. The Mayor has until 17 January 2011 to notify the Council of his decision and to issue any direction.

4 The decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk.

Update

5 At the consultation stage Ealing Council was advised that whilst the application was broadly acceptable in strategic planning terms, the application did not comply with the London Plan, in relation to residential quality, design, children’s play space, inclusive design, energy and transport. The applicant and Ealing Council have subsequently provided further information on these matters. Addressing each of these points in turn, the following is noted:

Residential quality

6 In considering the scheme at the initial consultation stage, the applicant was asked to confirm to what extent the scheme meets the Mayor’s Interim Housing Design Guide and Housing SPG EiP draft version, HCA standards, and the housing association’s own standards.

7 The applicant has carried out an audit against the Interim Housing Design Guide, and notes the scheme’s compliance in relation to floor to ceiling heights, room sizes, space standards, accessibility, cycle and refuse storage, for instance. The scheme would also comply with London and Quadrant (the applicant) and HCA standards, so as to attract grant funding (noting that the scheme has been allocated funding from the HCA).

8 These commitments are welcomed, and ensure that the scheme is in accordance with the London Plan and relevant supplementary planning guidance.

Children’s play space

9 At the initial consultation stage, concerns were raised about the quality of the central courtyard given its size and whether there was scope to expand this space by repositioning the townhouses. It was also questioned as to whether there would be sufficient capacity in nearby parks for the new residents.

10 In relation to the central courtyard, the applicant notes that the positioning of the townhouses on Palmerston Road is influenced by the presence of existing London Plane trees that would be retained as part of the development, due to their amenity value. This is a key factor in determining the building envelope of the scheme, and restricts the ability to move the building line

forward. Noting that the submitted documents suggest that sufficient daylight and sunlight would reach the central courtyard, and that conditions are imposed requiring the submission of details of hard and soft landscaping, it is considered that an acceptable standard of landscaping and amenity space would be secured.

11 The Council has confirmed that there is sufficient capacity within the local parks, particularly South Acton Recreation Ground adjoining the site to the west, to facilitate play for older children, and other nearby football pitches, together with a swimming pool at Acton town centre. A monetary contribution has been secured in the section 106 agreement to upgrade facilities, and this is welcomed.

12 Overall, the further information and commitments secured as part of the planning permission ensure that the scheme is in accordance with London Plan policy 3D.13.

Access and inclusive design

13 At the initial consultation stage, it was noted that the applicant had committed to ensuring that all of the housing is designed to Lifetime Homes standards and that 10% of units would be wheelchair accessible or adaptable. However, the applicant was asked to provide further details of how all unit types would meet the Lifetime Homes standards, including larger 4-bed units as only limited details had initially been submitted.

14 The applicant has provided additional drawings of how these standards would be met, including details of stair lift/through-floor lift, space for hoists, and storage space. These details are welcomed, and a condition has been secured by the Council requiring that the scheme be constructed in accordance with these details, thereby ensuring compliance with London Plan policies 3A.5 and 4B.5.

Climate change mitigation and adaptation

15 At the initial consultation stage, it was noted that the energy strategy had broadly followed the requirements of the London Plan, however further information was requested in relation to additional energy savings, the district heating strategy, the proposed biomass boiler and roof space for photovoltaic panels.

16 The applicant has sought to address the points raised by providing further information and clarification. Whilst it is noted that the applicant has not conducted modelling using 2010 Building Regulations (BR) compliance software, the scope for further energy efficiency improvements is constrained due to aspects of the already agreed design of the building. As this is a revised application where the original application was made and considered just prior to the 2010 Building Regulations coming into effect this is accepted.

17 The applicant has provided information illustrating how the heat network infrastructure routes could evolve in relation to the phasing of the development. The minimum size of the energy centre has been secured by condition in the event that connection to the Catalyst development does not occur. If the connection to the Catalyst development occurs, the development will be served from the Catalyst energy centre. This approach is acceptable.

18 The applicant has clarified that there is no intention to pursue the installation of a biomass boiler, and has highlighted the roof area available for installing photovoltaic panels. A condition has been secured requiring details of the 56kW photovoltaic array (PV) to be submitted to the Council prior to completion of the development.

19 It is noted that the condition relating to the energy strategy requires a detailed energy strategy to be submitted at a later date, and the condition in relation to PV allows some variation, should circumstances change. While some constraints are set out relating to the main elements of

the energy strategy, this could potentially allow some of the agreed elements of the energy strategy, e.g. the provision of PV, to be changed at a later date, which is not desirable. The Council notes the ambiguity in the current wording has agreed to amend condition 29 to ensure that the provision of PV is not undermined at a later date due to changes in circumstance.

Transport

20 Further information was requested at the initial consultation stage in relation to electrical vehicle charging points, the travel plan, trip generation and the pedestrian audit. Revisions to the parking layout and the installation of a footway, together with signage for cyclists and pedestrians, was also requested.

21 Subsequently, negotiations have taken place between the applicant and TfL and further information has been provided. TfL requested an audit of walking and cycle routes serving the site be undertaken and signage to be installed. It has since been agreed that this could be undertaken as part of the wider masterplan proposals for the estate. TfL is satisfied that there is sufficient section 106 monies available for the Council to spend on the provision of directional signage and to improve the pedestrian and cycle amenity in the future.

22 TfL previously questioned the significant 49% walk modal share assumptions and requested a revised trip generation derived from the TRAVL database be provided. Upon receipt of this information, it is accepted that the development will not result in an unacceptable impact on the local network.

23 In relation to the basement car parking layout and a lack of designated pedestrian access on the basement access ramp, upon further consideration TfL is supportive of these proposals. A planning condition which secures, prior to the commencement of any development, details of a site construction method statement/ management plan, for approval by the Council has been secured, which is welcomed.

24 TfL is satisfied that the framework travel plan (FTP) is acceptable in principle and notes that the document will be finalised and eventually incorporated into the full South Acton Estate Travel Plan. TfL is satisfied that the final document will be secured by planning condition.

25 Additional cycle spaces will be provided as requested by TfL to reflect the additional requirement of larger family units.

26 In relation to electric vehicle charging points (EVCP), a minimum a level of parking spaces was sought, in order to comply with the draft replacement London Plan. The applicant has agreed to a condition requiring for 20% active and 20% passive provision within the undercroft car park, or an alternative proposal details of which will be submitted for the written approval of the Council.

27 TfL is now satisfied that the application is acceptable in transport terms following further information provided by the applicant and can confirm that it is now in line with the relevant London Plan policies 3C.21, policy 3C.22 and policy 3C.2.

Response to consultation

28 The application was advertised by site and press notices and consultation letters, which were sent to 1378 neighbouring properties.

29 A total of seven responses were received as a result of the consultation process, with concerns raised in relation to the following:

- Scale and density of development should be reduced so that it is more in keeping with other nearby buildings.

- Loss of privacy.
- Loss of light/overshadowing.
- The scheme would adversely affect property values.
- The balconies would result in noise disturbance, odours, and would be used for storage.
- Quality of building materials and construction in terms of noise and disturbance.
- The ratio of car parking is too low.

30 Matters relating to loss of sunlight, daylight, privacy, and local amenities are not in this instance strategic planning matters and have been assessed by Ealing Council in the committee report. In relation to the objections raised by local residents in relation to transport, this matter has been dealt with in this and the previous report.

31 Other statutory consultees responded as follows:

CABE: No comments provided.

Environment Agency: No objections to the proposal, and no conditions are recommended.

London Fire and Emergency Planning Authority: No comments received.

Thames Water: No objections, but requests an informative advising that a water main crosses the site. Such an informative has been included.

Ealing Primary Care Trust: Requests contributions towards services to mitigate the impact of increased population. The Council has secured such a financial contribution as part of the section 106 agreement.

Article 7: Direction that the Mayor is to be the local planning authority

32 Under Article 7 of the Order the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at stage I, therefore there is no sound planning reason for the Mayor to take over this application.

Legal considerations

33 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in

Article 7(3) and set out his reasons in the direction. The Mayor must also have regard to the guidance set out in GOL circular 1/2008 when deciding whether or not to issue a direction under Articles 6 or 7.

Financial considerations

34 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 03/2009 (*'Costs Awards in Appeals and Other Planning Proceedings'*) emphasises that parties usually pay their own expenses arising from an appeal.

35 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

36 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

37 Having regard to the details of the application, the matters set out in Ealing Council's committee report and its draft decision notice, this scheme is acceptable in strategic planning terms. Further information has been provided, which together with conditions (and planning obligations) imposed by Ealing Council, address all the outstanding issues that were raised at Stage 1. On this basis, there are no sound reasons for the Mayor to intervene in this particular case.

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planning report PDU/2642a/01

30 November 2010

South Acton Estate Phase One (2.3)

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

in the London Borough of Ealing

planning application no.

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 a residential development of up to nine storeys to contain 167 units 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, together with the **housing mix** is acceptable on the basis that it contributes towards a **mixed and balanced** community across the wider estate.

The **design** changes that have been made are welcomed, and the scheme is considered to be of **high quality** and appropriate to its context. Further work is required in relation to **play space, inclusive design, 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 101 of this report; but that the possible remedies set out in paragraph 103 of this report could address these deficiencies.

Context

1 On 26 October 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 6 December 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.

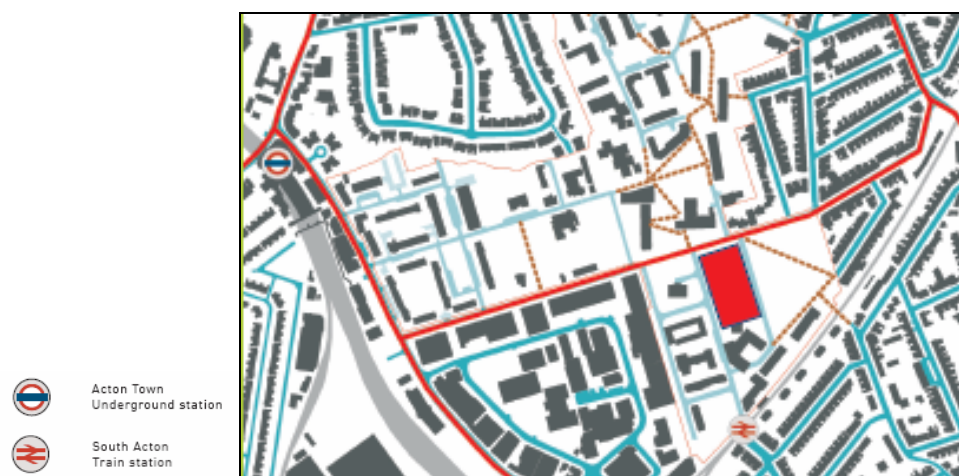


Figure 1: Site location plan (Source: submitted Design and Access Statement)

Details of the proposal

8 Full planning permission is being sought for 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.

9 Within the undercroft of the building, at ground floor level, 53 parking spaces are proposed, with refuse and cycle storage. A total of 22 on-street car parking spaces would be provided along All Saints Road and as part of the Home Zone.

10 The mix of units would comprise 159 flats and eight townhouses, comprising 57 one-bed flats, 83 two-bed flats, 19 three-bed flats and 8 four-bed houses.



Figure 2: Street 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 Mayor considered a similar application at Stage 1 in September 2010 (ref PDU/2642/01), where issues were raised in relation to affordable housing, the standard of accommodation, design, play space, energy and transport. The Mayor raised particular concerns

about the size and quality of the central courtyard. The applicant subsequently withdrew the application before the scheme was referred back at Stage 2, in order to address issues raised by consultees, including those raised in the Stage 1 response.

12 Prior to this, 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.

13 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).

14 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.

15 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 two 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.

16 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

17 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*

18 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).

19 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

20 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.

21 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.

22 As noted above, 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, meet the objectives of policy 3A.29.

Housing – affordable housing

23 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.

24 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.

25 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.

26 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”*.

27 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		

29 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	44	10	29	83	50%	38%
3-bed	7	2	10	19	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

30 As noted in table 1 above, there were previously 127 homes on the site of which 116 were social rented units and eleven were right to buy. The scheme proposes 167 housing units, of which 87 (52%) would be affordable housing with a 78:22 split between social rented and shared ownership.

31 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.

32 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.

33 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

34 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%.

35 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.

36 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.

37 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.

38 In considering the Stage 1 response to the previous application, the Council has advised that the viability appraisal submitted in support of the planning application has also been scrutinised by its Housing Service, which has advised that it is satisfied that the total provision of affordable housing on this site is the maximum level that is financially viable for this scheme. The scheme is also the subject of a principal development agreement (PDA) between the Council and Acton Gardens, which is nearing final agreement, and covers assessment of scheme viability, cross subsidy and proposals for dealing with land value and review mechanisms. As part of the pre-planning stage of each phase, all parties are aiming to maximise the provision of high quality affordable housing (for decant purposes) in the context of reducing public subsidy and the desire to create a vibrant housing market.

39 Each development phase would be subjected to a detailed viability test at a number of stages (pre-planning, post planning and post scheme completion) and would be scrutinised by independent financial advisors. The HCA would also continue to subject the schemes to scrutiny as part of funding applications. On this basis, it appears that assurances are in place to ensure maximum reasonable amount of affordable housing is being secured as part of this and the wider estate renewal. Details of proposed wording within the section 106 agreement would be welcomed to be satisfied that this and the wider estate renewal are appropriately linked.

Mix of units

40 London Plan Policy 3A.5 encourages a full range of housing choice. This is supported by the London Plan Housing Supplementary Planning Guidance, which 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. Policy 3.12 of the draft replacement London Plan states that within affordable housing provision, priority should be accorded to family housing. Recent guidance is also set out in the London Plan Interim Housing Supplementary Planning Guidance (April 2010) and draft replacement London Plan policy 3.8, which seeks to widen housing choice. Also relevant is policy 1.1C of the London Housing Strategy, which sets a target for 42% of social rented homes to have three or more bedrooms.

41 The scheme contains a broad mix of unit types and sizes including flats and town houses ranging from one-bed, two-person to four-bed, seven-person accommodation and complies with London Plan policy 3A.5. Within the social rented tenure, 26% of the units have three or more bedrooms. Whilst this does not meet the London Housing Strategy target for family-sized social rented homes, the majority of the two-bedroom units accommodate four persons and are therefore suitable for families. Furthermore, in the phases so far completed, 33% of the affordable units are 3-bed plus, and whilst it does not meet the Mayor's Housing SPG requirements, is a relatively high proportion.

42 The applicant confirms 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. The Council advises that the new homes being developed as part of this scheme are being built to meet a specific local housing need rather than a borough or strategic housing need. The completion of the new homes will facilitate the re-housing of the next anticipated phase of development on the estate. Although a Housing Needs Survey has not yet been completed, 80% of the residents of the next re-housing phase live in properties smaller than three bedrooms.

43 The proposed bed mix is also affected by the impact of the constraints of the individual site on the design of the development and the overall financial viability. Acton Gardens are meeting an identified local demand for large family houses through the provision of eight four-bedroom houses in social rent within this phase of the development. In addition, the first two phases of

development completed by Catalyst Housing Group (known as Phases 2.1A, 2.1B and 2.2) comprised of 254 affordable units.

44 With the consolidation of phases 2.1, 2.2 and the current scheme, the mix of housing in affordable tenure would be as follows:

Unit size	Phases 2.1 & 2.2	Current proposal	Total units	Total %
1-bed	73	28	101	30%
2-bed	87	39	126	37%
3-bed	81	12	93	27%
4-bed +	13	8	21	6%
Total (units)	254	87	341	100%

45 The Council advises that its Housing Regeneration service will continue to work with the applicant in the preparation of proposals that meet the needs of residents for decant purposes, and crucially, there will be opportunities within the masterplan proposals for varied typologies of development, including large family houses. On the basis that the applicant is working with the Council in order to establish what the local needs are, the scheme is in accordance with London Plan policy 3A.5.

Residential quality

46 The Mayor has recently published his draft interim Housing Design Guide and Housing SPG EiP draft which is derived from policy 3.5 of the draft replacement London Plan.

47 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, however the applicant has previously been 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 HQI standards. These details should be provided before the application is reported back at Stage 2.

48 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.

49 The rationale of providing both private and communal amenity spaces within a shared courtyard of the development is supported as this would encourage further activity, surveillance and a greater sense of ownership. 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.

Density

50 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.

51 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."*

52 The density of the site with the now demolished buildings 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).

53 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

54 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.

55 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).

56 As noted, the Mayor has published his draft interim London Housing Design Guide and Housing SPG EiP draft. The principles within these should help the scheme to demonstrate consistency with London Plan strategic design principles. This should be used to inform the design of schemes planning applications, including urban, passive (for mitigating climate change) and inclusive design.

Layout, scale, form

57 As was the case with the previous application that was recently considered by the Mayor, the scheme features two L-shaped blocks set at opposing corners of the site. These two blocks are

linked by two rows of town houses. The perimeter block layout proposed to the scheme is supported as it would help provide well overlooked, legible and well-connected places with clearly defined public spaces and secure private spaces.

58 The rationale of providing a car park at ground level and a podium level landscaped courtyard for the residents is supported as this 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-sized units and communal entrances to the apartments are all arranged around the outside perimeter of the block to create an active frontage, which would help to animate the street frontage and this is welcomed.

59 The height and massing proposed to the two L-shaped blocks are considered appropriate to their settings. The 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 allow penetration of daylight into the courtyard at different times of the day.

60 The proposed height of the 3-storey town houses 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. The proposed layout has been carefully designed to enhance the penetration of daylight into the private courtyard spaces. The rationale of providing varied amenity to the town houses to meet the different needs of the residents is strongly supported. It is noted that in addition to courtyards, balconies, front gardens and roof terraces, all the units will also have access to the communal amenity space.

Elevational treatment and materials

61 Since the previous scheme was presented to the Mayor, the applicant has undertaken a review of the scheme to reflect comments that were raised during consultation with the Council and GLA, as well as to reflect an internal review of the scheme with respect to the marketability of these private sale units. Whilst the massing and layout remain largely the same, the elevational treatment has evolved, now comprising framed brick clad bays and gables, with coloured balcony and textured panels. The revised design is a welcomed departure from the previous scheme, which was considered to be overly rigid and lacked a sense of dynamism. The revised design now features expressive stair towers and protruding balconies. The stacked balcony bays rise to between six and nine-storeys in response to their setting - high in locations such as Bollo Bridge Road and lower at the transition to the three-storey house. The rationale of introducing colour reveals to the balconies is welcomed, as it would help create a fresh image for the new development.

62 In terms of materials, brick clad gables and stone and glass cladding will be applied to the facades of the apartment blocks. A material sample board should be submitted in order to allow officers to assess the quality of the materials and their appearance when applied in combination.

Landscaping

63 As previously advised, the proposed landscaping is of good quality, comprising of native tree species 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.

64 The submitted information suggests that lighting and long benches will be incorporated into the scheme, with lighting to highlight certain features in the courtyard. However, it is not clear

where this lighting and furniture will be located. Further details relating to this area should therefore be secured by way of condition, in association with detailed landscaping requirements.

65 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.

Children's play space

66 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.

67 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 with long bench seats for balancing and imaginative play. 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.

68 It is noted that the Mayor raised concerns about the quality of this communal space during the consideration of the previous application. It is acknowledged that the central courtyard is restricted by virtue of its dimensions and proximity to habitable windows, and the applicant has sought to demonstrate the quality of this space with visualisations of how it could be laid out. However, there remains a concern about its narrowness (at 15 metres), and the architect is asked to investigate the possibility of expanding this space by repositioning the four houses along Palmerston Road so that they are closer to the road. Details of this should be provided before the application is reported back at Stage 2.

69 This aside, the proposed play facilities are considered to be well designed and show the applicant's commitment to finding a compromise between the demands of residents and the requirement to provide play space for all ages within the development. 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. Given the staggered nature of the buildings, it is considered that sufficient light and sun would reach the courtyard.

70 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. It is acknowledged that 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.

Access and inclusive design

71 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.

72 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. It is noted, however that the majority of the residential units are one and two-bed flats, the architect is therefore asked to include a typical flat/house layouts for these flats, as well as the four-bed houses, demonstrating how they meet each of the sixteen criteria set out in the Lifetime Homes standards. The accommodation schedule indicates that sixteen 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.

73 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.

Sustainable development

74 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

75 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).

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 189 tonnes of regulated carbon dioxide emissions per annum after the application of passive design and energy efficiency measures. A reduction in regulated carbon dioxide emissions of 15% 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 6% reduction in emissions is achieved.

78 Based on the information provided, the proposed development does not appear to achieve any carbon savings from energy efficiency alone compared to a 2010 Building Regulations compliant development. Using 2010 Building Regulations compliance software, the applicant should model, and commit to, additional measures that can be adopted to enable the development to exceed 2010 Building Regulations compliance through energy efficiency alone. District heating

79 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 has confirmed that connection to the existing Catalyst plant room is continuing to be pursued.

80 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. The applicant should provide a schematic showing how the development's heat network will evolve during phasing. Combined Heat and Power

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

82 The applicant states that dark blinds coupled with mechanical extract ventilation, with a summer boost where required, will allow effective night-time ventilation in summer months. The applicant has proposed additional measures to minimise the need for active cooling systems. This includes the use of thermal mass, use of overhead balconies and recessed external space to limit midday solar gain and the use of low energy lights and appliances. No further information is required on cooling.

Renewable energy technologies

83 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.

84 A total of 56kWp of photovoltaic energy is also proposed. It is noted that the applicant has not provided any detailed roof drawings that indicate the amount of roof that is available within the development and that could be used to install photovoltaic panels with suitable orientation that is free of shading. These details should be provided before the application is reported back at

Stage 2, and secured as a condition of any planning permission. 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

85 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.

86 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.

87 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

88 The development proposes to provide a total of 75 car parking spaces, of which twelve would be provided to disabled standards. Given the public transport accessibility level of 3 and outer London location a ratio of 0.45 parking spaces per unit is acceptable. Provision is made for two car club spaces and their location is acceptable. The on-site car parking should be provided with electric vehicle charging points in line with draft replacement London Plan policy 6.13 which states that 20% of all residential spaces must be equipped with active charging points for electric vehicles with an additional 20% passive charging provision. These details should be secured by way of any planning permission that is granted.

89 Details of an audit of walking and cycling routes serving the site have been provided, and whilst this is welcomed, the audit should include recommendations to rectify the identified deficiencies and how these will be secured. In addition there will be a need to include signage directing pedestrians and cyclists to the passenger transport network and to local amenities. This will ensure general conformity with London Plan policy 3C.21 Improving conditions for walking and draft replacement London Plan policy 6.10 Walking.

90 The data to determine the multi-modal trip generation has been derived using TRICS. This should be re-assessed using the TRAVL database in accordance with TfL's Best practice guidance (April 2010). Within the trip generation figures quoted, the high proportion of walking trips is queried and further details regarding how these figures were derived are required.

91 There are concerns in relation to safety connected with the main access route to the undercroft car park from Palmerston Road. As previously advised, there is no segregated footway proposed adjacent to the vehicle ramp for pedestrian access to the car park. This design could result in conflict between vehicles and pedestrians and as such, it is recommended that a footway on at least one side of the entrance ramp be installed.

92 In addition, the positioning of pedestrian entrances into the building from the undercroft parking also raises concerns, because the location of the disabled bays restricts access and will cause conflict between pedestrians and disabled vehicle users. While the disabled parking should be in close proximity to the access routes, it is recommended that a clear pedestrian route, separate from disabled parking spaces, be provided.

93 The installation of the footway on the vehicle access ramp and revised basement layout will ensure general conformity with London Plan policy 3C.21 Improving conditions for walking and draft replacement London Plan policy 6.10 Walking.

94 The scheme proposes a cycle provision ratio of 1:1, to be located at ground floor level, and accessible either from the street or off the communal block entry cores. Whilst the location is welcomed, the draft replacement London Plan recommends one cycle parking space for one and two-bedroom units, and two spaces for three or more bedroom units. The architect is therefore asked to increase the provision of cycle parking space according to reflect the additional requirement of larger family units. These spaces must be safe and secure with good lighting and CCTV. Eight visitor cycle parking stands are proposed and their location is suitable.

95 A construction logistics plan (CLP), which identifies efficiency and sustainability measures to be undertaken while developments are being built, should also be submitted. The CLP should be secured by planning condition. This will ensure general conformity with London Plan policies 3C.17 Tackling congestion and reducing traffic and 3C.25 Freight strategy and draft replacement London Plan policy 6.14 Freight.

96 The travel plan has passed the ATTrBuTE assessment. However, TfL has recommended some necessary improvements before the travel plan can be considered acceptable. The travel plan must be secured, enforced, monitored, reviewed and funded through the section 106 agreement.

97 In summary, the application does not currently comply with the London Plan. A number of measures are highlighted in this report including electrical vehicle charging points being required, recommendations in relation to supplementing the pedestrian audit, signage directing cyclists and pedestrians, a revised trip generation, footway installation on the entrance ramp, and a revised basement parking layout. A construction logistics plan will also need to be secured by condition and also an improved travel plan. These issues must be addressed before this application can be considered acceptable in transport terms.

Local planning authority's position

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

Legal considerations

99 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

100 There are no financial considerations at this stage.

Conclusion

101 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 delivered in the overall masterplan and wider estate renewal and in light of the fact that the maximum reasonable amount of affordable housing is achieved. The housing mix has been dictated by local housing needs and over the whole masterplan development a relatively high proportion of 3-bed plus units are delivered. On this basis, the scheme is in accordance with policies 3A.1, 3A.5 and 3A.10 of 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 is of generally high quality and this density is considered acceptable.
- **Urban design:** The amendments made to the scheme are welcomed and the proposal is broadly consistent with the design principles of the London Plan.
- **Children's play space:** A play strategy has been submitted, however further work regarding the courtyard space and details of the play space in the adjoining park is 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, and subject to clarification as to the typical layout of a range of wheelchair accessible units, the proposal is policy compliant. 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.

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

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

- **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.
- **Children’s play space:** Further discussion and information is required in relation to the central courtyard and an assurance that nearby parks have sufficient capacity for this and recently constructed schemes in the vicinity.
- **Inclusive design:** A typical flat layout for a range of wheelchair accessible units should be provided before the application is reported back at Stage 2, in addition to the typical two-bed flat layout.
- **Sustainable development:** Further information is required in relation to additional energy efficiency savings, the district heating strategy, the proposed biomass boiler 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 before this application can be considered acceptable in transport terms, details of which should be secured by way of condition or section 106 planning obligation. This includes securing details of electrical vehicle charging points, further details in relation to the travel plan, trip generation and the pedestrian audit. Signage for cyclists and pedestrians, a revised basement parking layout for blue badge parking, and a footway installation on the entrance ramp is also necessary. A construction logistics plan should also be secured by condition.

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