planning report PDU/ 2972/ 01

6 March 2013

Smith’s Farm, Northolt
in the London Borough of Ealing
planning application no. PP/ 2012/ 4910

<table>
<thead>
<tr>
<th>Strategic planning application stage 1 referral (new powers)</th>
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<table>
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<tr>
<th>The proposal</th>
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<tr>
<td>Outline application for the demolition and removal of existing buildings and redevelopment to provide up to 64 homes and a 6,896 sq.m. landscaped extension to the Northolt and Greenford Countryside Park, incorporating a foot/ cycle bridge and surface crossing over Kensington Road.</td>
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<table>
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<th>The applicant</th>
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<tr>
<td>The applicant is Woodpile Limited, and the architect is Norton Ellis Architects.</td>
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<th>Strategic issues</th>
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<tr>
<td>The proposal would result in substantial harm to the openness of Green Belt. Whilst there may be very special circumstances in this case, assurances are sought before officers could be satisfied that these would outweigh the harm caused by the inappropriate development.</td>
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Notwithstanding the above, other strategic issues are raised with respect to housing, urban design, inclusive access, sustainable development and transport.

<table>
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<th>Recommendation</th>
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<tr>
<td>That Ealing Council be advised that the application does not comply with the London Plan for the reasons set out in paragraph 66 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.</td>
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<th>Context</th>
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<tr>
<td>1 On 18 December 2012 the Mayor of London received a letter from Ealing Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. On 31 January 2013 the documentation associated with the application was received from the applicant’s planning consultant. Under the provisions of The Town &amp; Country Planning (Mayor of London) Order 2008 the Mayor has until 13 March 2013 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.</td>
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2. The application is referable under Category 3D 1.(a)(b) of the Schedule to the Order 2008: “Development on land allocated as Green Belt or Metropolitan Open Land in the development plan... ; and which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.”

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 or allow the Council to determine it itself, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

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 lies within a section of Metropolitan Green Belt land, south of the Western Avenue (A40), and east of the Target Roundabout junction with Church Lane (A312). The plot is bound by Kensington Road to the west, Horse Shoe Crescent and suburban residential development to the south, and the Northolt and Greenford Countryside Park to the north and east. The Countryside Park forms part of an east-west corridor of public open space, incorporating Northala Fields (west of the site, across Kensington Road), which is an award winning country park landmarked by four conical hills which feature prominently alongside the Western Avenue.

6. Smith’s Farm comprises a total area of 1.4 hectares and is occupied by ten buildings, spread widely across the site, and comprising a mixture of ex-farm buildings and commercial sheds. There are also a number of temporary structures across the site, and large open yard areas. The site has been used for commercial purposes for the last 25 years, and current uses include a lorry park, workshops, storage and plant yards.

7. The nearest section of Transport for London Road Network is the Western Avenue (A40), which is located approximately 500 metres north of the site, and may be reached via a slip road from Kensington Road. The nearest section of Strategic Road Network is Church Road (A312) located 950 metres to the west. Bus route E10 serves Kensington Road and Horse Shoe Crescent and provides links to Northolt Underground station (Central Line) and Ealing Broadway Underground station (Central and District lines, and rail services). Northolt Underground station is closest to the site, located approximately 1.1 kilometres to the north. The public transport accessibility level of the site is one, on a scale where one is lowest and six is highest.

Details of the proposal

8. The proposal is an outline application for demolition and removal of the existing commercial/farm buildings, and comprehensive redevelopment of the site to provide up to 64 flats (across four blocks) with associated parking, landscaping, and a children’s play area. It is also proposed to deliver a 6,896 sq.m. landscaped extension to the Northolt and Greenford Countryside Park, incorporating a fifth conical mound and a foot/cycle bridge and surface crossing over Kensington Road.

Case history

9. On 14 June 2012 GLA officers held a pre-planning application meeting at City Hall to discuss an earlier iteration of this proposal with the applicant and the Council. The pre-planning application proposal comprised 75 residential units, and a larger quantum of development. The advice given by GLA officers on 28 June 2012 stated that the aspiration of rationalising built
development at the site to enhance the openness and appreciation of Green Belt is strongly supported, and the proposed enhancements to Northolt and Greenford Countryside Park are welcomed. However, officers expressed the view that the scheme for 75 residential units would generate a higher quantum, scale and height of built development at the site, and this would cause substantial harm to the openness of the Green Belt. The applicant was advised to reduce the quantum of development to address this concern, whilst being mindful of other strategic issues raised with respect to housing, urban design, inclusive access, sustainable development and transport.

**Strategic planning issues and relevant policies and guidance**

10 The relevant issues and corresponding policies are as follows:

- **Green Belt**
  - London Plan;
- **Housing**
  - London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Providing for Children and Young People’s Play and Informal Recreation SPG;
- **Affordable housing**
  - London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy;
- **Density**
  - London Plan; Housing SPG;
- **Urban design**
  - London Plan;
- **Inclusive access**
  - London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM);
- **Sustainable development**
  - London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy
- **Biodiversity**
  - London Plan; the Mayor’s Biodiversity Strategy;
- **Transport and parking**
  - London Plan; the Mayor’s Transport Strategy;
- **Crossrail**
  - London Plan; and, Mayoral Community Infrastructure Levy.

11 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 2012 Ealing Development (Core) Strategy, the 2004 Ealing Unitary Development Plan (saved policies), and the 2011 London Plan.

12 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework; and,
- The Revised Early Minor Alteration to the London Plan.

**Principle of development**

13 The intention to rationalise built development at this site, in order to enhance the openness and appreciation of Green Belt, is strongly supported. However, officers note that the proposed development would be larger in quantum, scale and height to existing built development at the site, and would constitute inappropriate development, as defined by the National Planning Policy Framework. Officers must, therefore, consider whether very special circumstances exist in this case that would outweigh the harm to the Green Belt. This consideration is set out in the section that follows.
Green Belt

The applicant proposes a comprehensive redevelopment of the site, in order to reduce the spatial dispersal of buildings, and provide a larger and more coherent parcel of open land. Nevertheless, the quantum of development proposed represents an uplift (in floorspace terms) over the existing situation. The table below provides comparative figures based on the information available.

<table>
<thead>
<tr>
<th></th>
<th>Built footprint</th>
<th>Floorspace</th>
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<tbody>
<tr>
<td>Existing site</td>
<td>1,674 sq.m.</td>
<td>c.1,719 sq.m.</td>
</tr>
<tr>
<td>Proposed redevelopment</td>
<td>1,390 sq.m.</td>
<td>4,416 sq.m.</td>
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The proposal would result in a 284 sq.m. reduction in built footprint at the site, but a 2,697 sq.m. uplift in floorspace. As these figures would suggest, the nature of the built form at the site is proposed to be shifted from multiple low-rise buildings (10 buildings between one and two-storeys), to fewer, medium-rise, buildings (four buildings between three and five-storeys in height). Whilst this represents a more rationalised pattern of development, the medium-rise buildings will feature prominently in certain views (refer to the urban design section of this report), and will cause substantial harm to the openness of the Green Belt. Therefore, as discussed in the principle of development section of this report, officers must consider whether there are very special circumstances that would outweigh this harm.

The applicant’s planning statement identifies two components of the scheme that it feels constitute very special circumstances. These comprise ‘rationalisation of Green Belt development’ and ‘benefits to Northolt and Greenford Country Park’. These are considered below.

Rationalisation of Green Belt development

As discussed in paragraph six, the site is currently occupied by ten farm/commercial buildings (of between one and two-storeys) which are distributed widely across the site. The plot also hosts a number of temporary portacabin structures, as well as large open yard areas which accommodate parked lorries, plant and other commercial paraphernalia. These buildings, vehicles and structures are clearly visible from a number of public vantage points, including Kensington Road, Horseshoe Crescent, and most notably Northala Fields (part of Northolt and Greenford Countryside Park). From the latter vantage point the site appears prominently in the foreground of a panoramic vista towards central London. GLA officers are of the opinion that, in its current condition, the development and activities at the site cause considerable harm to the openness of the Green Belt and detract from the appreciation of a coherent Countryside Park.

The applicant seeks to consolidate the distribution of development at the site to provide a greater appreciation of visually homogenous Green Belt land, and to achieve a larger area of genuinely green open space. Based on the information provided, officers note that the proposal would reduce the spatial dispersal of development at the site from 14,409 sq.m. to 7,513 sq.m. (equivalent to a reduction of 48%). The applicant has also sought to focus the built development at the south of the site, at the boundary with existing residential development.

Benefits to Northolt and Greenford Country Park

As discussed in paragraph five, the Northolt and Greenford Countryside Park forms part of an east-west corridor of public open space which reaches across the site from Northala Fields to an area of parkland east of the site. The eastern parkland is locally designated as a site of importance for nature conservation. Whilst a comparatively thin strip of land between the Western Avenue and Smith’s Farm allows a green corridor connection in ecological terms, public access between
Northala Fields and the remainder of the Countryside Park east of Kensington Road is constrained by a lack of legibility and permeability across the Smith’s Farm site. The GLA understands that it is an aspiration of Ealing Council to improve east-west permeability within the Country Park, and the adopted 2004 Ealing UDP map identifies Smith’s Farm as a development site with the potential to facilitate this.

20 In response to this intention the applicant proposes to concede 6,896 sq.m. of land at the north of Smith’s Farm (48% of the site) to be incorporated within the Northolt and Greenford Countryside Park. The intention is that this would be greened and landscaped by the applicant to provide quantitative and qualitative improvements to the established green corridor which connects Northala Fields and the wider Countryside Park to the east. As part of this proposal the applicant intends to provide a landscaped conical mound, similar in nature to the four existing mounds at Northala Fields to the east of the site. The mound would be formed from inert material (primarily London clay) generated through Crossrail excavations.

21 Furthermore, to specifically address the Council’s aspirations for improved east-west public access through the Countryside Park, the applicant proposes a bridge between Northala Fields and the Smith’s Farm site over Kensington Road. At the Smith’s Farm site the bridge would land on the western side of the proposed mound, within the portion of land that is proposed to be transferred to the Northolt and Greenford Countryside Park. This would allow for a direct connection with the eastern mound at the Northala Fields site, and provide a legible east-west pedestrian and cycle link over Kensington Road, following a logical desire line.

Consideration of very special circumstances case

22 GLA officers agree that there is merit in the intention to rationalise development at the site through reduced areal dispersal and closer affiliation with existing residential development at Horse Shoe Crescent. However, it is noted that the proposal would generate a higher quantum, scale and height of built development at the site, and this would cause substantial harm to the openness of the Green Belt.

23 Notwithstanding this, it is acknowledged that the applicant has responded to GLA officer advice provided at pre-application stage, which sought a reduced quantum of development. It is noted that the submitted application comprises 11 (15%) fewer units, and represents a 867 sq.m. (38%) reduction in built footprint, and a 858 sq.m. (16%) reduction in proposed floorspace, compared to the earlier iteration of the scheme. This reduction in the quantum of development is supported, and allows a 16% larger land apportionment (almost an extra 1,000 sq.m.) to be contributed to Northolt and Greenford Countryside Park.

24 The proposed improvements to Northolt and Greenford Countryside Park, in terms of land gain and access enhancements, are strongly supported. Officers note that these measures would deliver genuine public benefits, and would contribute to an improved relationship between the site and the remainder of its adjoining Green Belt context, by promoting a greater appreciation of visually homogenous, and genuinely green, Green Belt land.

25 Having considered these benefits, and the overall response in urban design terms (refer below), officers are of the view that there may be very special circumstances in this case. However, the applicant should respond to comments with respect to affordable housing and masterplan approach in the housing and urban design sections of this report. Furthermore, in order to be satisfied that the proposed public benefits would outweigh the substantial harm to Green Belt, GLA officers would expect the delivery, and phasing, of the benefits to be appropriately secured by way of section 106 legal agreement. Given the importance of the landscaped conical mound, and the
east-west pedestrian and cycle bridge, officers would strongly encourage the Council to seek the front-loaded delivery of these features, where feasible and viable.

26 A final assessment against London Plan Policy 7.16 (Green Belt), and guidance within the NPPF, will be made at the Mayor’s decision making stage, following negotiation on the section 106 legal agreement detailed heads of terms and draft clauses.

**Housing**

27 Following on from the comments made above, the primary concern with respect to the built development at the site, which in this case is housing, will be in terms of minimising the quantum of development and, therefore, minimising the impact of the development on the openness of the Green Belt. This approach is in line with London Plan Policy 7.16 on Green Belt, and Policy 3.4, which seeks to optimise housing output taking into account local context and character, and the design principles in London Plan Chapter 7.

**Proposed housing provision**

28 As discussed in paragraph eight, the proposals include the provision of 64 residential units. The table below sets out the proposed housing schedule for the outline application.

<table>
<thead>
<tr>
<th>Unit type</th>
<th>Affordable</th>
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<tbody>
<tr>
<td>One-bedroom</td>
<td>24</td>
</tr>
<tr>
<td>Two-bedroom</td>
<td>24</td>
</tr>
<tr>
<td>Three-bedroom</td>
<td>16</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>64</strong></td>
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**Affordable housing**

29 Based on the information provided within the planning statement, the applicant is proposing that all units would be affordable housing. The applicant states that it has received interest from a number of registered providers, who would acquire and manage the proposed residential blocks. The applicant states that it is pursuing a tenure split that would accord with the strategic London Plan target of 60% social rent/affordable rent and 40% intermediate (Policy 3.11). However, at this stage a housing schedule indicating how this split would be expressed across the above unit mix has not been provided.

30 Having had regard to the scale of the scheme, and the nature of the surrounding residential context, GLA officers are satisfied that the proposed 100% provision of affordable housing would accord with the aims of London Plan Policy 3.9. However, whilst the maximisation of affordable housing within this scheme is in line with London Plan Policy 3.12, officers would support the introduction of private market units (at the expense of affordable units) where this would have a beneficial influence on scheme viability, and would result in a reduced quantum of development. This approach is in line with the context set out in paragraph 27 above.

**Mix of units**

31 Based on the residential mix provided the scheme would deliver a range of one, two and three-bedroom units, achieving a 25% provision of (three-bedroom) family housing overall. GLA officers are broadly supportive of the balance of unit sizes given the scale of the scheme, however, it is acknowledged that the tenure split within the mix is still to be resolved. In allocating the affordable tenures across the residential mix, and in accordance with the associated aims of London Plan policies 3.8 and 3.11, the applicant is advised to be mindful of guidance within the
Mayor’s draft revised Housing Strategy, which states that 36% of funded affordable rent homes will be family sized.

Residential standards

32 The applicant has stated that the outline parameters of the application will allow for all dwellings to meet or exceed the minimum space standards within London Plan Table 3.3, and the submitted information supports this. Nevertheless, the Council is encouraged to secure compliance with these strategic space standards by way of planning condition. Based on the design information and indicative layouts submitted, officers are content that the outline application would allow for the detailed residential design to be delivered in broad accordance with guidance in the Housing SPG (2012) and the best practice principles of the London Housing Design Guide (2010). Residential standards within the proposal are, therefore, supported in line with London Plan Policy 3.5.

Children’s play space

33 Based on the residential mix presented above, and the methodology within the Mayor’s Shaping Neighbourhoods: Play and Informal Recreation SPG (2012), GLA officers have calculated an expected child population of up to 61 for the development. Based on this, the Mayor’s SPG indicates that the development would need to make provision for 610 sq.m. of children’s play and informal recreation space.

34 The applicant is proposing a 699 sq.m. provision of dedicated children’s play area on the site. Officers are of the view that this, coupled with other opportunities for informal neighbourhood play within the adjoining Countryside Park will ensure that the scheme would comfortably exceed the play requirements of the SPG. The provision of children’s playspace is supported in accordance with London Plan Policy 3.6, and the Council are encouraged to secure detailed approval of a play strategy (to specify the nature of the associated play equipment) by way of planning condition.

Density

35 Given the characteristics of the site, discussed in paragraphs five to seven above, the London Plan density matrix (Table 3.2 in support of London Plan Policy 3.4) would suggest a residential density of between 150 to 200 habitable rooms per hectare for this development.

36 The submitted planning statement confirms that the proposed residential density of the development, based on net residential area, would be 244 habitable rooms per hectare. Whilst this would slightly exceed the range indicated by Table 3.2, having had regard to the surrounding residential context; the need to minimise the extent of built footprint on Green Belt; and, the proposed design quality, officers are content that the density proposed accords with the strategic aims of London Plan Policy 3.4.

Urban design

37 Following on from the comments made within the Green Belt section of this report, the primary concern with respect to design suitability is in terms of minimising the impact of the development on the openness of the Green Belt. To this end, and notwithstanding the design observations provided below, the applicant is advised to have regard to the comments made within the housing section of this report, and to investigate opportunities for improving viability and reducing the quantum of development proposed.
38 It is noted that the design of the scheme has been significantly revised since pre-application stage. Generally the modifications respond well to GLA advice, and have helped to resolve a number of previously identified urban design issues. An updated review of the scheme is provided below.

**Impact on openness**

39 As discussed in above, the proposal would result in a reduced dispersal of built development at the site, but would create a higher quantum, scale and height of built development resulting in substantial harm to the openness of the Green Belt. In order to help assess this harm, the applicant has submitted a visual study, which provides rendered visualisations of the proposal from various local views.

40 Based on this officers note that the proposed buildings would appear most prominently within views along Kensington Road. Whilst there are urban design benefits in providing a well defined built edge to the streetscape (discussed in paragraph 42 below), this will undoubtedly change the nature of this section of the street (which is currently characterised by a large extent of vegetative screening, and a number of small-scale buildings). Officers are of the opinion that the scale and prominence of the three and four-storey residential blocks along Kensington Lane will cause substantial harm to the openness of Green Belt in these views.

41 The applicant has also provided a key local view of the scheme from the eastern mound at Northala Fields. This is likely to be the point from which the greatest number of people would survey the site. The view demonstrates that the rationalisation of the built development at the site, and the creation of a more generous width of green corridor between Northala Fields and the eastern Countryside parkland, would create a greater appreciation of coherence to the Countryside Park. It is also noted that, to a certain extent, the scale of the proposed flatted residential buildings is offset by virtue of the juxtaposition with the proposed landscaped mound. Officers are of the opinion that the proposal would have a beneficial impact on the openness of the Green Belt in this view.

42 Having considered the visualisations collectively, officers are of the view that the development will cause substantial harm to the openness of Green Belt. This harm is likely to be perceived most acutely along Kensington Road. Notwithstanding this, the rationale in terms of development layout is sensible in urban design terms. The block configuration provides a legible urban fringe to the Green Belt, helping to form a coherent relationship with adjacent residential development and offering a much improved level of passive surveillance on to Kensington Road. The proposed approach would also create a more generous width of green corridor between Northala Fields and the eastern parkland, providing a greater sense of coherence to this part of the Green Belt.

**Masterplan approach**

43 It is noted that the proposal would demolish a farmhouse building and (locally listed) barn at Kensington Road, replacing them with a new residential block. GLA pre-application stage stated that officers would be willing to consider the loss of these buildings, where this would provide demonstrable gains in terms of Green Belt openness. Whilst it is noted that the proposed approach has helped to support a more rationalised layout, and contributed towards an additional apportionment of land to Northolt and Greenford Countryside Park, based on the visualisations provided GLA officers are not satisfied that the loss of these buildings (including the locally listed barn) would be outweighed by the associated improvements. Therefore, in accordance with the principles of London Plan Policy 7.9, the applicant is strongly encouraged to retain the farmhouse and barn within the proposed masterplan. Whilst it is acknowledged that a revised layout
incorporating these buildings may necessitate an increased footprint of development on Green Belt, officers would be willing to balance the associated harm against the benefits associated with the conservation of these buildings.

44 Having considered the other characteristics of the masterplan layout, officers are of the view that there is scope to reduce the amount of parking and hardstanding proposed. The current configuration (adjacent to Horse Shoe Crescent in particular) does little to minimise the visual prominence of vehicles, which undermines the sense of open space around the buildings. To ensure accordance with London Plan Policy 7.1 a more rationalised and efficient parking strategy (avoiding large swathes of parking) should be provided. Car parking should be laid out so that it would be in close proximity to buildings. Where long rows of car parking are necessary, these should also be interspersed with tree planting.

Architectural quality

45 Whilst it is noted that this scheme is still in outline form, officers are of the view that the architecture of the buildings requires further work. The visualisations provided indicate the buildings would be characterised by a high solid to void ratio, with excessively small windows. Accordingly, the applicant is encouraged to give consideration to providing larger windows as the scheme moves forward to detailed design stage, in order to provide a more friendly and open architectural response.

Inclusive access

46 The submitted design and access statement confirms the applicant’s commitment to ensure that 100% of the proposed dwellings would meet the Lifetime Homes standard, and indicates that the scheme could provide up to 25% of units (sixteen units) as wheelchair accessible/adaptable dwellings. This would meet and exceed the associated targets within London Plan Policy 3.8, and is strongly supported. The Council is encouraged to secure these standards by way of planning condition.

47 Based on the information provided officers note that the development would allow at-grade access to dwellings, and the proposed east-west pedestrian bridge between Northala Fields and Northolt and Greenford Countryside Park. This is supported, and in line with pre-application advice, GLA officers would expect inclusive access principles to underpin the detailed resolution of the proposed landscaping enhancements to Northolt and Greenford Countryside Park (including the pedestrian bridge and connecting paths). To this end, officers would welcome the submission of an access strategy for the Countryside Park extension, to be approved by the Council, and secured by way of planning condition.

48 Whilst it is noted that the scheme would provide seven dedicated disabled parking spaces (10% of the overall provision) given the ability of the scheme to provide up to sixteen wheelchair accessible dwellings in future, and in accordance with the principles of London Plan policies 6.13 and 7.2, officers would welcome the development of a parking strategy to respond to any increased need for Blue Badge parking provision in future. Such a strategy should be secured by way of planning condition. The applicant is also advised that disabled parking spaces should be located as close as possible to building entrances, and that the detailed design of the disabled parking spaces should accord with the Department for Transport’s ‘Inclusive Mobility’ guidance.
Sustainable development

Energy strategy

49 In line with London Plan Policy 5.2, the applicant has submitted an energy strategy for the development, setting out how the scheme will reduce carbon dioxide emissions in accordance with the London Plan energy hierarchy. The components of the energy strategy are supported and, given the nature of the development and the context, it is accepted that a site heat network and combined heat and power system will not be pursued in this case. Overall the proposal is expected to deliver a reduction of 23 tonnes of carbon dioxide per year in regulated emissions, compared to a 2010 Building Regulations compliant development. This is equivalent to an overall saving of 28%, which would exceed the current (2010-2013) target within London Plan Policy 5.2. The Council is strongly encouraged to secure accordance with the proposed energy strategy by way of planning condition.

Climate change adaptation

50 Given that a high proportion of the plot is currently hard standing, the proposals would result in net gains for urban greening at the site. A sustainable urban drainage strategy will also be pursued, allowing drainage from impermeable parts of the site to a surface water pond. Given the extensive use of roof-mounted solar panels (313 sq.m.) within the proposed energy strategy officers have accepted that the provision of green roofs has been discounted. The applicant has identified the existing trees which would need be removed in order to facilitate the development (sixteen) and has proposed a semi-mature native tree planning strategy which would ensure there would be no net loss. The climate change adaptation proposals are supported in line with London Plan policies 5.10, 5.13 and 7.21, and the Council is encouraged to secure detailed approval of these measures by way of planning condition.

Biodiversity

51 Smith’s Farm is adjacent to a site of importance for nature conservation, and the applicant has conducted an ecological appraisal to identify any existing habitats and/or species at the site of particular ecological value. On the whole, the individual habitats recorded at Smith’s Farm were of low nature conservation value. However, the existing barn building (proposed to be demolished) was identified as having the potential to accommodate roosting bats, and further (seasonal) studies were recommended for bats, great crested newts and reptiles.

52 The ecological appraisal also seeks to identify opportunities for the enhancement of the biodiversity value of the Smith’s Farm site. It is noted that recommendations comprise habitat enhancement measures including pond creation, wildlife friendly planting, and woodland planting/enhancement. These measures would be supported in accordance with London Plan Policy 7.19.

53 The Council should ensure that the necessary additional ecological studies are undertaken prior to commencement (through planning condition), and that the proposed biodiversity enhancements are secured by way of planning condition/section 106 legal agreement, as appropriate.
Transport

Impact on the transport network

Transport for London (TfL) is content that the trip generation assessment for the development is acceptable, and officers are of the view that the proposals would be unlikely to result in a significant impact on the Transport for London Road Network. Furthermore, TfL supports the proposed pedestrian and cycle footbridge across Kensington Road and, given that no additional car parking is associated with the Countryside park extension, TfL does not anticipate a significant number of new vehicular trips.

Whilst the proposal is not expected to result in any significant impact on local bus service capacity, it is likely that people travelling to and from the site will use the existing bus service to Northolt Underground station. Therefore, in line with London Plan Policy 6.3, TfL seeks a capped construction of £20,000 per stop towards the upgrade the two bus stops in close proximity to the site (at Kensington Road and Horse Shoe Crescent) in order to improve accessibility and pedestrian waiting area.

Parking

A total of 64 parking spaces are proposed for the residential development, which equates to a ratio of one space per dwelling. Giving the nature of the proposed development, and the low public transport accessibility of the site, TfL is content with this level of provision. However, in accordance with London Plan Policy 6.13, 20% of the proposed car parking spaces should be equipped with electric vehicle charging points, with a passive provision made for a further 20% of spaces.

In accordance with London Plan Policy 6.9, provision for 80 secure and covered cycle parking spaces should be made on site. The applicant should identify space for this accordingly.

Walking

In accordance with the principles of London Plan Policy 6.10 it is recommended that a pedestrian environment review system audit is undertaken in order to identify any necessary pedestrian improvements for routes to amenities in the vicinity of the site. TfL would encourage the Council to secure any identified pedestrian and public realm improvements in the vicinity of the site as a planning obligation of the scheme, to be implemented through a section 278 agreement with the relevant highway authority.

Travel and logistics planning

TfL supports the applicant’s intention to provide a full travel plan. The travel plan should be produced in accordance with TfL’s guidance, and reviewed in accordance with the ‘ATTrBuTE’ assessment tool. The final submission of the travel plan should be secured and monitored through the section 106 legal agreement in accordance with London Plan Policy 6.3. Similarly, the submission of draft construction management plans for both the residential development and the countryside park extension is supported, however, in line with London Plan Policy 6.14, TfL is of the view that a construction logistics plan should be secured for the development by way planning condition.

Community infrastructure levy

The Mayor has introduced a London-wide community infrastructure levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into
effect on 1 April 2012, and it will be paid on commencement of most new development in Greater London granted planning permission on or after that date. The Mayor’s CIL will contribute towards the funding of Crossrail.

61 The Mayor has arranged boroughs into three charging bands. The rate for Ealing is £35 per square metre. The required CIL should be confirmed by the applicant and Council once the components of the development, or phase thereof, have themselves been finalised.

62 London borough councils are also able to introduce CIL charges which are payable in addition to the Mayor’s CIL. Ealing Council has yet to adopt a scheme, but is expected to begin consultation on a draft charging schedule during 2013. Further details will be made available on the Council’s website.

Local planning authority’s position

63 Ealing Council is expected to formally consider the application at a planning committee meeting in March/April 2013.

Legal considerations

64 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. 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

65 There are no financial considerations at this stage.

Conclusion

66 London Plan policies on Green Belt, housing, urban design, inclusive access, 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:

- **Green Belt**: The proposal would result in substantial harm to the openness of Green Belt. Whilst there may be very special circumstances in this case, assurances are sought before officers could be satisfied that these would outweigh the harm caused by the inappropriate development. A final assessment against London Plan Policy 7.16, and NPPF guidance, will be made at the Mayor’s decision making stage.

- **Housing**: Whilst the proposed (100% affordable) housing provision within this scheme is broadly supported in principle, the applicant is encouraged to consider whether the introduction of private market units (at the expense of affordable units) would have a beneficial influence on scheme viability, and would result in a reduced quantum of inappropriate Green Belt development.
• **Urban design:** The proposal will cause substantial harm to the openness of Green Belt. The applicant should seek to retain the farmhouse and barn buildings on Kensington Road, and provide a more rationalised parking configuration, to ensure accordance with London Plan policies 7.1 and 7.9. Advice is also provided on architectural quality.

• **Inclusive access:** Whilst the overall response to access and inclusion is supported, in accordance with the principles of London Plan policies 6.13 and 7.2 a (conditioned) access strategy is sought for the Countryside Park extension, and further discussion is sought with respect to disabled parking provision within the context of potential future demand.

• **Sustainable development:** The proposed energy strategy, climate change adaptation measures and biodiversity enhancements are broadly supported in line with London Plan policies 5.2, 5.10, 5.13, 7.19 and 7.21. The Council should secure the detailed approval of these proposals by planning condition accordingly.

• **Transport:** Whilst the proposal is broadly acceptable in strategic transport terms, further discussion, clarification and/ or commitments are sought with respect to bus stops; parking; walking; and travel and logistics planning, to ensure accordance with London Plan policies 6.3, 6.9, 6.10, 6.13 and 6.14.

On balance, the application does not yet comply with the London Plan.

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