Strategic planning application stage 1 referral


The proposal

Redevelopment of an office building for the same use but with more floor space and height.

The applicant

The applicant is Chantryco Investments Limited, the agent is Nathaniel Lichfield & Partners and the architect is Cooper Cormar Architects.

Strategic issues summary:

Land use: The redevelopment of an existing office building located within Uxbridge Road Business Quarter for the same office use is appropriate and supported. (paragraphs 13 to 17)

Affordable workspace: Not provided, but has to be addressed (paragraphs 16 and 17)

Other strategic issues assessed in this report include urban design, inclusive access, sustainable development and transport.

Recommendation

That Ealing Council be advised that while the application is generally acceptable in strategic planning terms, on balance, the application does not comply with the London Plan, for the reasons set out in paragraph 41 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1. On 2 November 2016 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 5 December 2016 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 the following categories of the Schedule to the Order 2008:
• Category 1B: “Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings — (a) in the City of London and with a total floor space of more than 100,000 square metres; (b) in Central London (other than the City of London) and with a total floor space of more than 20,000 square metres; or (c) outside Central London and with a total floor space of more than 15,000 square metres.”

• Category 1C: “Development which comprises or includes the erection of a building of one or more of the following descriptions — (c) the building is more than 30 metres high and is outside the City of London.”

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 redevelopment site known as Exchange Plaza is located at 52-58 Uxbridge Road. It lies at the corner of Uxbridge Road and St Leonards Road, at the edge of the town centre. It is situated in close proximity to West Ealing and Ealing Broadway Railway Stations.

6 The site is located in Ealing Council’s proposed Uxbridge Road Business Quarter (Site allocations Development Site – Policy EAL9). The existing office building extends to 5,573 square metres with part-6/part-7 storeys, and has approximately 60 on site car parking spaces. The urban context is varied in form ranging in scale from 2-21 storeys.

7 The primary vehicular route is Uxbridge Road to the south edge of the site. There are strong pedestrian flows along Uxbridge Road, and also St Leonards Road which is the primary route to nearby West Ealing Station. The A4020 Uxbridge Road to the south of the site forms part of the Strategic Road Network. The closest section of the Transport for London Road Network is the A406 Hanger Lane (North Circular Road). The closest station is West Ealing approximately 600m north west of the site, and is served by First Great Western and Heathrow Connect. Ealing Broadway Station is approximately 840m to the east, which also operates these lines as well as the London Underground Central and District Lines. Both stations will be served by the Elizabeth Line when it opens in 2019. There are numerous bus routes along Uxbridge Road in the vicinity of the site. The public transport accessibility level (PTAL) of the site is very good and estimated at 5 on a scale of 1 to 6, where 6 is ‘excellent’.

**Details of the proposal**

8 Redevelopment to provide a part 6 to 10 storey office building of B1(a) office space with flexible 300 square metres (GIA) A3 cafe space at ground floor; basement, car and cycle parking; refuse storage; associated roof top private amenity spaces; landscape; and public realm improvements (following the demolition of the existing part 6 and 7 storey office building). The current proposal will result in additional height of 10 metres and 16,618 square metres floor space (GIA).
Case history

On 12 April 2016, a pre-planning application meeting was held at City Hall comprising GLA officers and the applicant and its consultants. The redevelopment of the office building was broadly supported and concerns in regard to urban and inclusive design, sustainable development, flood risk management and transport were highlighted. The applicant was advised that future planning application must address the concerns raised to ensure compliance with the London Plan.

Strategic planning issues and relevant policies and guidance

The relevant issues and corresponding policies are as follows:

- Principle of land use: London Plan;
- Urban design: London Plan;
- Access: London Plan; Accessible London: achieving an inclusive environment SPG;
- 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;
- Transport: London Plan; the Mayor’s Transport Strategy;
- Crossrail: London Plan: the Mayor’s Crossrail Funding SPG;

For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plans in force for the area are the 2012 Ealing Core Strategy DPD, the 2013 Ealing Development Management DPD and Site Allocations DPD, and the 2016 London Plan (Consolidated with Alterations since 2011).

The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance, and the Mayor’s Town Centres SPG (2014) and Crossrail Funding SPG (Updated March 2016) are also relevant material considerations.

Land use principle: office redevelopment in a designated business quarter

The application site lies within Ealing town centre’s Office Quarter and is allocated within the Council’s Development Sites Allocations DPD (December 2013) by virtue of Policy EAL9. The ‘U’ shaped allocation site includes ‘Craven House, Bilton House and land to the rear of Cavalier House’, anticipating an office-led (Use Class B1a) redevelopment including ancillary commercial uses at ground floor and small scale residential and/or community uses to the northern boundary.

The London Plan Policy 4.2 ‘Offices’ supports the redevelopment of office provision to improve London’s competitiveness and to address the objectives of the London Plan as whole. This policy also encourages the renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility as well as seeking increases in the current stock where there is evidence of sustained demand.
15 The supporting text of the above policy indicates that the most viable location for the renewal and modernisation of office stock in outer London include locally oriented, town centre based office provision. The Mayor’s Town Centres SPG (2014) - sets out guidance to supplement the Town Centre policies – Policy 2.15 ‘Town centres’ and Policy 4.7 ‘Retail and town centre development’ contained in the London Plan. In particular, it provides detail on how to carry forward the Mayor’s view that boroughs and other stakeholders should “encourage renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility. Although the application site is located at the edge of the town centre it is noted that it is within the Uxbridge Road Business Quarter (Site allocation Development Site: Policy EAL9), where office development is supported.

16 **Provision of affordable workspace:** The planning statement in sec 5.7 states that a number of smaller businesses occupy the existing building and CEG is working with those tenants to accommodate them elsewhere in Ealing, where possible. Also in sec 5.22 it states ‘It is CEG’s ambition to create a Grade A office building and for it to be a ‘best in class’ building capable of attracting headquarter occupiers, designed to BCO specification. The intention is to set a new benchmark for quality office development in Ealing and to achieve this it is important that the quality of the space for future occupiers meets or exceeds industry guidelines and market expectations, in terms of both quality space requirements and specification.’

17 Whilst such office redevelopment is supported in the context of provision of additional space and improved quality, there is a concern in terms of workspace affordability which should be addressed. London Plan Policy 4.1 ‘Developing London’s Economy’ stresses on the need to promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost. Therefore, the applicant is required to submit details of these in regard to its workspaces provision in particular how affordable the office rental levels are for small and medium sized enterprises. Further information should be provided on the quality of the office space and rent levels/affordable. A planning obligation may be secured to ensure some of the units are affordable.

18 **Employment and training:** The planning documentation states that the increase in the number of full-time employees will be approximately fourteen fold (from 225 existing to 3,160 proposed) and is much supported though no information on the details of the projected types of jobs has been submitted. In an effort to fulfil the requirements of London Plan policies 4.12 ‘Improving Opportunities for All’, the applicant should seek to guarantee that local residents and businesses benefit from jobs created by this proposal. The Council should secure the provision of jobs for local residents and on-the-job training for young people through an appropriate condition.

**Urban design**

19 At the pre-application meeting, GLA officers considered the proposal to be of an attractive design overall and were supportive of the proposed height and massing of the building. Recommendations were made to improve the quality and usability of public realm at the front of the building to Uxbridge Road. This revolved around the impact of the size of the columns supporting the overhang of the building above and the removal of planters which impeded the usability and pedestrian movement of the space.

20 The scheme has been improved in response to the pre-application meeting advice report by slimming the columns on the Uxbridge Road to create a more meaningful area of public realm with associated landscaping. This is supported.
Inclusive access

21 **Key access provisions**: The design and access statement accompanied with floor plans and drawings confirms that the redevelopment will generally provide: wide common corridors to facilitate horizontal access and six compliant passenger lifts with clear internal dimensions for wheelchair access to all floors, disabled WC at every level, and level accessible landscaping.

22 **Emergency escape**: The development of a PEEP (Personal Emergency Evacuation Plan) is recommended as an active management approach for individuals who may require further assistance when evacuating the premises, which is supported.

23 **Blue Badge parking**: The proposed redevelopment will provide 53 on site car parking spaces in a secure basement car park. 5% (3 spaces) of the capacity will be Blue Badge parking.

24 The scheme complies with policy 7.2 of the London Plan and the Council should secure the proposed measures through appropriate planning conditions.

Sustainable development

**Energy**

Energy efficiency standards

25 The development is estimated to achieve a reduction of 141 tonnes per annum (28%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development. However, the applicant should provide the full ‘be lean’ BRUKL to verify the inputs and savings claimed as well as confirm how the development performs against Criterion 3.

District heating & CHP

26 A site heat network served by a single energy centre, which will facilitate later connection to an area wide district heating network is proposed. This is supported. The applicant is proposing to install ~40-50kWe CHP unit to provide heating and 100% of the hot water demand. Whilst this is welcomed, the applicant should confirm the heating and hot water demand for the redevelopment as well as the proportion of the space heating that is being provided by the CHP unit. The applicant should also provide the analysis used to determine the size of the CHP including, suitable monthly demand profiles for heating, cooling and electrical loads. A reduction in regulated CO₂ emissions of 37 tonnes per annum is expected to be achieved through this second part of the energy hierarchy.

Renewable energy technologies

27 The applicant stated that 334 square metres of PV panels could be installed, depending on the final design of the development. The applicant should therefore confirm that the proposed PV installation can and will be accommodated in the final design. It is estimated that the scheme could meet a 3% reduction compared to the 2013 Building Regulations.

Overall carbon savings

28 A reduction of 179 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 35%. The on-site savings, depending on the installation of PV panels, meet the target within Policy 5.2 of the London Plan. However, the comments above should be addressed before the savings can be verified.
Transport

Access

29 It is proposed that vehicular access to the basement level car park will be provided via a priority access on to St Leonard’s Road in a similar location to the current access. Pedestrian access to the site will be achieved from a number of points along its perimeter, with the main entrance located on the frontage with A4020 Uxbridge Road. The proposed access arrangement is acceptable; however it requires a Stage 1 Road Safety Audit be carried out for the proposed vehicular access arrangement.

Car parking

30 The site is located within a Controlled Parking Zone (CPZ). The proposal includes 53 car parking on site spaces for the proposed office. The overall car parking provision has been reduced from the current 60 spaces.

Trip generation and mode share

31 In line with London Plan policy 6.3, a trip generation and mode share assessment was undertaken. TfL questions the robustness of the mode share assessment as it is based on the census data for the ward where the proposal is based, rather than where workers are coming from. Therefore, the assessment should be reviewed in order that the highway impact can be assessed.

Walking

32 A PERS audit has identified that walking environment and quality varies greatly between locations, and it has revealed that Broadway in particular, is suffering from narrow footway width, street clutter, and variable footway conditions. Ealing Council is therefore recommended, where appropriate, to seek contribution towards walking and public realm improvements in line with London Plan policy 6.10.

Cycling

33 The proposal includes a total of 208 cycle parking spaces within the basement area via ramp. TfL welcomes that the level of provision exceeds the minimum requirements set in the London Plan, and that shower and locker facilities will be provided.

34 A cycle level of service (CLOS) assessment has identified that local cycle environment varies between routes and junctions. It highlights the limited cycle infrastructure in the vicinity of the site, with the exception of Ealing Broadway station, and an intimidating environment for cyclists along the section of A4020 (between Uxbridge Road/The Broadway/New Broadway). A number of junctions along this route are noted as being high risk to cyclists. In line with London Plan policy 6.9, TfL strongly recommends that Ealing Council seeks a contribution toward improvements to addressing cycling facilities on the A4020.

Servicing and construction

35 The existing arrangement of off street servicing will be retained and access/exit can be achieved in forward gear. However, a Stage 1 Road Safety Audit should be completed. TfL requires that a draft delivery and servicing plan and construction logistics plan be submitted, in order to comply with London Plan policy 6.14 ‘Freight’. These should accord with TfL guidance and be secured by condition and/or through the s106 agreement.
Crossrail SPG

The site is also located within the area where s106 contributions for Crossrail should be sought in accordance with London Plan policy 6.5 and the associated Supplementary Planning Guidance (SPG) ‘Use of planning obligations in the funding of Crossrail’ (March 2016).

Community Infrastructure Levy (CIL)

In addition the Mayor has also introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3 toward the funding of Crossrail. The rate for the Ealing is £35/sqm. The required CIL should be confirmed by the applicant and council once the components of the development or phase have been finalised. In these situations, the Mayoral CIL will be treated as a credit towards the s.106 Crossrail liability and should be reflected in the wording of the s.106 agreement.

Local planning authority’s position

The Council planning officers have yet to confirm their position.

Legal considerations

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

There are no financial considerations at this stage.

Conclusion

London Plan policies on land use principle, affordable workspace, employment and training, urban design, inclusive access, sustainable development and transport are relevant to this application. Whilst the application is broadly acceptable in strategic planning terms, on balance, the application does not comply with the London Plan. The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Land use principle**: The proposed office redevelopment within Uxbridge Road Business Quarter for the same office use is appropriate and supported.
- **Affordable workspace**: No provision has been made, but this concern has to be addressed.
- **Urban design**: The design is a high quality and supported.
- **Inclusive access**: The scheme complies with policy 7.2 of the London Plan and the Council should secure the proposed measures through appropriate planning conditions.
- **Sustainable development:** The on-site savings, depending on the installation of PV panels, meet the target within Policy 5.2 of the London Plan. However, the concerns discussed above in regard to provision of the full BRUKL, CHP analysis and confirmation on the inclusion of PV panels should be clarified and addressed before the savings can be verified.

- **Transport:** The applicant is required to address the matters discussed above such as the Stage 1 Road Safety audits, trip generation and mode share calculations, cycling improvements and servicing and construction. In particular, there remain significant concerns over the excessive provision of car parking and the poor cycle environment and infrastructure provision in the vicinity of the site.

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