

**Ref:** 215892REM

**Address** Phases 9.3, 9.5 and 9.6 of the Remaining Area of Acton Gardens Master Plan (South Acton Estate) Acton, W3 8TQ

**Ward:** South Acton

**Proposal** Reserved matters application for Phases 9.3, 9.5 and 9.6 of the Remaining Acton Gardens Masterplan pursuant to conditions 7 (Reserved Matters) and 8 (Reserved Matters Details) of the Hybrid Outline Planning Permission Ref: 182579OUT (dated 24/12/2018) for the continued regeneration of the South Acton Estate. Application seeks approval for Means of Access, Appearance, Landscaping, Layout and Scale in relation to the construction of a new buildings varying in height from 3 to 9 storeys comprising 215 residential units including the retention and refurbishment of 8 no. terraced dwellings within Phase 9.3; with associated reconfiguration of the Jerome Tower Allotments; amenity space; refuse, recycling and bicycle storage; plant rooms; car parking; tree removal and public realm improvements; following the demolition of all other existing buildings.

The application is accompanied by an Environmental Statement of Compliance.

**Drawing numbers: Application**

Drawings

Architectural: ACT-PTE-P1-00-DR-A-10110 Rev. P1; ACT-PTE-P1-XX-DR-A-10111 Rev. P1; ACT-PTE-ZZ-00-DR-A-10100 Rev. P1; ACT-PTE-ZZ-01-DR-A-10101 Rev. P1; ACT-PTE-ZZ-02-DR-A-10102 Rev. P1; ACT-PTE-ZZ-03-DR-A-10103 Rev. P1; ACT-PTE-ZZ-04-DR-A-10104 Rev. P1; ACT-PTE-ZZ-05-DR-A-10105 Rev. P1; ACT-PTE-ZZ-06-DR-A-10106 Rev. P1; ACT-PTE-ZZ-07-DR-A-10107 Rev. P1; ACT-PTE-ZZ-XX-DR-A-10000 Rev. P1; ACT-PTE-ZZ-XX-DR-A-10002 Rev. P1; ACT-PTE-ZZ-XX-DR-A-10004 Rev. P1; ACT-PTE-ZZ-XX-DR-A-10005 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10200 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10201 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10202 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10300 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10301 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10302 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10303 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10304 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10305 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10306 Rev. P1

Landscape: 11474-LD-PLN-100 Rev. P3; 11474-LD-PLN-110 Rev. P3; 11474-LD-PLN-111 Rev. P3; 11474-LD-PLN-150 Rev. P2; 11474-LD-PLN-151 Rev. P2; 11474-LD-SEC-600 Rev. P1; 11474-LD-SEC-601 Rev. P1; 11474-LD-SEC-650 Rev. P1

Documents:

Cover Letter (Barton Willmore); Design and Access Statement (Dated 17 September 2021); Planning Statement (Ref: 27157/A3/AK, Rev. 2, Dated 22 September 2021); Transport Statement (Ref. 21043-TS01, Rev. B, Dated 24 September 2021); Statement of Community Involvement (Dated July 2021); Affordable Housing Statement (Dated

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September 2021); Block Management Plan (Dated September 2021); Reconciliation Statement (Ref. 27157/A3/RM Application, Rev. 1, Dated 1 September 2021); Planning Fire Statement (Ref. FL7579/ks/18cppl, Dated 1 September 2021); Gateway 1 Fire Statement Form (Dated 1 September 2021); Outline Fire Strategy Report (Ref. FL7579/R1, Rev. 2, Dated 1 September 2021); Daylight, Sunlight and Overshadowing Report (Ref. 63283/01/BK/TRL, Dated September 2021); Conservation Statement (Ref. 180634, Rev. 2, Dated 7 September 2021); Arboricultural Impact Assessment (Ref. 1609.1, Dated 8 September 2021); EIA Statement of Compliance (Ref. 27157/A5/EIA, Dated 8 September 2021); and Updated Phasing (Ref. 27157/A3, Rev. 00, Dated September 2021).

**Type of Application:** Reserved Matters Application (REM)

**Application Valid:** 27.09.2021

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**Report by:** Tiago Jorge

## 1. RECOMMENDATION

**Recommendation Application:** Grant reserved matters approval subject to the conditions set out in Annex 1.

### Executive Summary

Permission is sought to agree a reserved matters (REM) application for Plots 9.3, 9.5 and 9.6 of the South Acton Estate regeneration masterplan.

The Reserved Matters application itself proposes refurbishment of existing houses, new houses and flat development that would form the last residential development Phases within the Enfield Road Character Area of the South Acton Estate Regeneration Scheme. Overall, the application proposes to complete the western portion of the masterplan area with the construction of new buildings varying in height from 3 to 9 storeys comprising 215 residential units (including the retention and refurbishment of 8 terraced dwellings within Plot 9.3) comprising of 663 habitable rooms (hr).

A total of 331 habitable rooms are proposed to be provided as affordable housing with 264 as Affordable Rent and 67 as Shared Ownership. This equates to a total 49.9% (~50%) provision which is itself split 80% Affordable Rent and 20% Shared Ownership on a habitable room basis. The development will be tenure blind with no distinguishable difference between the appearances of the various tenures of accommodation.

The proposals for Plot 9.3 comprise terraced housing while Plots 9.5 and 9.6 propose each a U-shaped, courtyard-style building. The proposed courtyard-style layouts within Plots 9.5 and 9.6 enable active frontage to be delivered along the surrounding streets, whilst simultaneously creating courtyards which are shielded from views along the public highway, but which open onto the neighbouring allotments. This arrangement also ensures that the maximum amount of daylight and sunlight is received by the allotment land.

The buildings will form a key part along the northern edge of the residential neighbourhood located at the western end of the remaining area of the Acton Gardens Masterplan. When read alongside Phase 9.1, Plots 9.2 and 9.4 these plots will complete the northern edge along the secondary arteries of Enfield Road and Osborne Road.

The submission provides details of Layout, Scale, Appearance, Means of Access and Landscaping for the proposed buildings within these plots. It conforms with all the parameters and principles relevant to this development plot and the residential form of development. The submission is also supported with technical information to satisfy the requirements of pre-reserved matters conditions. These have been incorporated both within the REM submission or submitted under separate planning applications.

Officers have considered the proposals for Plots 9.3, 9.5 and 9.6 reserved matters application has been widely consulted on. A total of 10 comments have been received on the reserved matters application, comprising of 8 objections and 2 neutral representations. These comments have been reviewed, assessed, summarised and addressed in the relevant sections of the report.



Osborne Road

The proposals also include the reconfiguration and enhancement of the existing Jerome Tower Allotments. The reconfigured allotments will remain broadly in the same location, to the north of Jerome Tower, with a new area delivered to the west of the existing allotment land and to the north of Plot 9.3. As a result of this reconfiguration, 1,827sqm of existing allotment land will be lost, which is compensated by the provision of 2,425sqm of new allotment land. The new allotment site will therefore be 4,300 sqm in size, 596 sqm larger than the current 3,704 sqm facility.

Extensive and positive consultation with existing allotment holders, Ealing Parks and planning officers has been carried out with the proposals for the reconfigured allotments being fully supported. A separate discharge of condition application, relating to Condition 21 (application ref: 215670CND) of the Hybrid Outline Masterplan, has been submitted under a separate cover, which would be recommended for approval, following positive recommendation by this committee.

The Reserved Matters proposal is considered to provide a high-quality residential development that would positively contribute to the wider-regeneration aspirations for South Acton and continue the Council's Estate Regeneration Programme.

An EIA (Environmental Impact Assessment) Statement of Compliance was submitted to LB Ealing to accompany the submission. It concludes that the reserved matters application is in accordance with the 2018 Masterplan Permission and parameter assessed within the previously submitted ES.

### **Site and Surroundings**

The South Acton Estate development site as approved by applications P/2014/2142 and 182579OUT is wholly located within the South Acton Ward and covers a total area of approximately 28.68ha. The estate mainly comprises residential buildings, a number of existing educational establishments (Berrymede Infant & Nursery School, Berrymede Middle School, and South Acton Children's Centre) and a number of small commercial units.

The extensive (now better known as Acton Gardens) estate is characterised by a set of diverse interfaces at each of its edges and it is broadly bound to the north by Mill Hill Road; to the south by the London Overground railway line and Rowley Industrial Estate; to the east by Brouncker Road and the rear of predominantly Victorian housing in Church Road and Berrymead Gardens; and to the west by properties in Avenue Road, Avenue Gardens, Heathfield Road (all within the Mill Hill Park Conservation Area) and Bollo Lane.

The original estate is mainly comprised of flatted development in medium to high-rise blocks (up to 17-storeys) constructed in the 1950s, 60s and 70s following clearance of 19th century Victorian properties, with most of the existing original buildings being in poor condition.

### **Plots 9.3, 9.5 and 9.6 Site**

These plots encompass land located in the western portion of the Remaining Masterplan Area, within the Enfield Road Character Area. The site is bound to the south by Osborne Road; to the west by Phases 9.1, 9.2 and 9.4; to the north by the existing properties and their rear gardens along Heathfield Road, and to the east by Berrymede Junior School (North). The Site is circa 1.8ha in size and comprises a number of existing residential buildings, including:

- 2-16 Enfield Road, a row of eight three-storey houses on Enfield Road;
- Jerome Tower, a 17-storey tower block built in 1963 (94 units);
- 32 Osborne Road, a former public house and hotel which has been converted to flats (10 units); and
- Doyle House, a four-storey residential block located to the rear of the site (16 units)

The site also historically comprised Buchan House, an eight-storey residential block to the West, on Hanbury Road; the building, however, was demolished early to enable the construction of plot 9.2 and the repositioning of Hanbury Road.

The site also includes the Jerome Tower Allotments, an existing community asset owned and managed by Ealing Council. Jerome Allotments covers 3,704sqm and includes 21 allotment plots of various sizes (comprising 18 individual plots, of which two are subdivided into smaller plots, as well as one community plot), communal facilities, access paths, blocks of established planting and trees and boundary fencing.

The site forms the remainder of Phase 9 of the Masterplan, with Phases 9.1, 9.2 and 9.4 either already completed or currently under construction, and will therefore complete the Enfield Road Character Area. The Enfield Road Character Area serves as a gateway to the Masterplan area from Acton Town station and Bollo Lane, and therefore has a prominent position within the Remaining Masterplan area.

The site is not within a Conservation Area and does not contain any heritage assets. Within the wider area, Acton Town Underground Station is Grade-II listed (ref: TQ 19461 79637), and

the Mill Hill Park Conservation Area is situated to the immediate north of the site. Furthermore, the Gunnersbury Park Conservation Area, which falls within LB Hounslow, is located to the west of the site, across Bollo Lane.

The Public Transport Accessibility Level (PTAL) varies between 3 - 4 across the site. This is reflective of its proximity to Acton Town Underground Station (District & Piccadilly lines) to the northwest, along with the considerable number of bus stops and local bus routes. The site is also a 10-minute walk from South Acton Overground Station.

### **Background**

The principle of development at Acton Gardens Regeneration Area was established through granted outline planning permission in 2013 (with planning reference P/2012/0708) and was subsequently revised via an outline planning application (with planning reference 182579OUT) which was approved on 24 December 2018 (the 2018 Masterplan Permission'). The description of the 2018 Masterplan permission is as follows:

*“Hybrid planning application for the continued regeneration of the South Acton Estate encompassing an outline mixed use development comprising; up to 195,396sqm residential floorspace (Class C3) with any associated temporary show homes; up to 2,200sqm non-residential floorspace including 1,200sqm of community space (Class D1) and up to 1,000sqm of flexible commercial space (Class A1, A2, A3, B1, D1, D2); an energy centre up to 750sqm, access, open space and public realm. Detailed permission is sought for access, appearance, landscaping, layout and scale of Phase 9.2 comprising 20,612sqm (of the total 195,396sqm) of residential floorspace (Class C3) [203 dwellings] and 123sqm (of the total 1,000sqm) flexible commercial floorspace (Class A1, A2, A3, B1, D1, D2) with associated refuse/recycling and bicycle storage; plant rooms; car parking; works to the public highway and public realm improvements following the demolition of Buchan House, Anstey Court and properties on Osborne Road and tree removal.”*

Significant progress has been made on site, with the detailed consent achieved so far for the delivery of 1,346 units, split into individual and unique phases. Currently, Plot 9.4 to the west of the estate is approaching completion while Plot 9.2 is just recently occupied.

As part of the original (2012) Outline Application for the Acton Gardens Masterplan, a new Central Plaza was consented for Phase 6. This is now operational (albeit with a construction compound present towards the east) and is anticipated to provide open space with an art feature alongside the community facilities, health care facilities, a nursery and convenience retail.

Alongside this, a key principle of the original Masterplan was for the creation of “satellite retail” opportunities which would complement both the new Community Hub and the existing Acton Town Centre. Accordingly, a Sainsbury’s Local has also been provided within Phase 6.

### **On-Site Progress to Date**

The site wide masterplan below shows a diagrammatic representation of the phases already delivered or currently under construction as part of the 2013 and 2018 Masterplan consents. This diagram also illustrates the site for Plots 9.3, 9.5 and 9.6 proposals within the Enfield Character Area.



Reconciliation Masterplan

**Reserved Matters Conditions**

The 2018 Outline Masterplan Permission includes a number of Reserved Matters related conditions intended to establish key principles of the forthcoming development. The majority of these require submission prior to or coincident with applications for reserved matters being submitted to the Council. Reserved Matters applications are required to accord with commitments and strategies approved under these conditions where relevant.

All of the relevant REM conditions applications for these Plots have been submitted concurrently with the REM submission, as per table below:

	Condition	Reference	Description	Status
Submission concurrent	9	215821CND	Details of Sunlight and Daylight Report	Approval



to Plots 9.3, 9.5 and 9.6 Reserved Matters Application	10	216033CND	Details of Microclimate Assessment	Approval
	11	216220CND	Details of Wind Assessment	Approval
	12	216034CND	Details of Flood Risk Assessment	Approval
	13	216035CND	Details of Swept Paths	Approval
	14	216263CND	Walking and Cycling Study	
	15	216264CND	Cycle Parking part pursuant to condition 15	
	16	216034CND	Details of Fire Statement	Approval
	17	216037CND	Details of Open Space Surveys	Approval
18	216262CND	Open Space Design		
23	216038CND	Active Design Statement		

However, there remains a number of reserved matters associated condition applications which require approval prior to commencement of works on any new plot. The wording of these conditions does not specifically require their discharge prior to the approval of Reserved Matters, but in some instances, there is a direct material relationship between the details of the reserved matters submission and the principals being captured within the conditions. As such the following pre-commencement conditions pursuant to Plots 9.3, 9.5 and 9.6 have been submitted:

	Condition	Reference	Description	Status
Prior to start of works on Plots 9.3, 9.5 and 9.6	25	215827CND	Details of Bat Survey	Pending
	26	215828CND	Details of Biodiversity Roofs	Recommended Approval
	29	215855CND	Details of Sustainable Design and Construction	Recommended Approval
	34	215997CND	Details of Sustainable Urban Drainage	Pending
	37	215998CND	Details of Carbon Savings	Recommended Approval
	51	215999CND	Details of Overheating and Cooling for Residential Units	Recommended Approval
	62	215834CND	Details of Travel Plan	Pending
	71	215830CND	Details of Glazing Strategy and Sound Insulation	Pending
72	215990CND			
73	215991CND			
76	215992CND	Noise Mitigation		

As the relevant aspects of these conditions are acceptable to the LPA in the development of Plots 9.3, 9.5 and 9.6, the Planning Committee is in the position to make a decision prior to the formal approval of these outstanding conditions. If required, an update will be reported in the Addendum to the Planning Committee in relation to those conditions applications that have been discharged since the publication of this report.

**Proposal Description**

This Application seeks to bring forward the next part of the Remaining Area of the Acton Gardens Masterplan, pursuant to the 2018 Masterplan Permission Ref: 182579OUT. The Proposed Development is for 215 residential units spread across Plots 9.3, 9.5 and 9.6 of the Remaining Acton Gardens Masterplan Area, with associated landscaping, amenity space, refuse and recycling facilities and car and cycle parking. The subject site forms the northern-most boundary of the west limb of the masterplan and is part of the identified Enfield Road Character Area.

This phase of the masterplan will complete the west area of the estate, making important new connections between the Central Plaza and school buildings and the Western sections of the masterplan which in turn leads up to Acton Town Station. The layout of these phases and its townscape role is to frame the existing and newly created streets and present new active frontages overlooking Osborne Road and Enfield Road.

These plots would comprise residential use within two perimeter style block blocks and two rows of houses comprising 215 residential units. The design for these plots proposes new houses and two courtyard style residential development ranging between 2 and 9 storeys. The buildings will deliver houses, new apartments and maisonettes, combined with new residential amenity space and with associated landscaping, refuse and recycling facilities and car and cycle parking.

The urban design approach adopted by the architects is based on the principles of connected streets, active frontages and well defined and overlooked public spaces to help people feel at home, comfortable in, and proud of their neighbourhood.

A fundamental principle of the scheme is to recreate traditional urban blocks by making clear distinctions between public and private space, whilst ensuring that streets and public spaces are lined by active building frontages with windows, balconies and front doors, especially at ground floor level.

The scheme also aims to deliver high quality semi-private and private amenity space. The balconies are designed to provide generous outside private space and the communal courtyards are located to be easily accessible and benefit from sunlight and natural surveillance. The proposal also includes high quality shared surface streets, private rear gardens, communal gardens and balconies to combine with the amenities of the two large parks.

The provision of open spaces is supported by a clear street network, legible routes leading pedestrians through the public spaces, and general permeability throughout the neighbourhood.

**Street Layout**

The plots complete the connections between the previous phases to the west with the existing buildings to the east and the masterplan beyond. Plot 9.3 completes the Enfield Road frontage as a connecting street with Acton Town Station to the west. Hanbury Road which has been repositioned as part of the works to Plot 9.2 forms the western elevation of Plot 9.5, the southern corner of which has a prominent position on the West Park.

The two new courtyard blocks decrease in scale west to east in keeping with the established masterplan characteristics. The new central dividing street has been given the name 'Willet Way', a landscaped space at the heart of the development, the threshold of which is formed by the articulation of the two corner blocks that form the entrance.



The courtyard of Plot 9.5 is a mix of hard and soft landscaping providing both amenity and car parking. Plot 9.6 is a smaller more intimate garden space. Glimpses into these spaces is offered through the generous communal entrances.

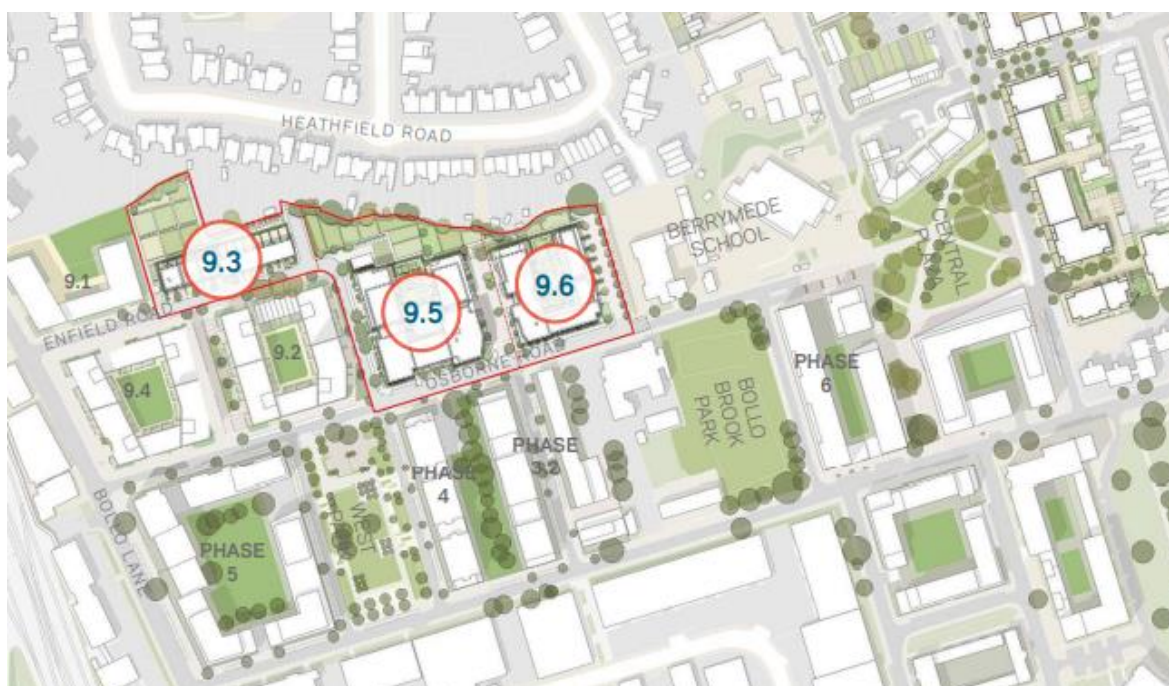
The eastern edge along the existing Osborne Road spur that forms the boundary with the primary school replaces a disjointed series of car-parking, storage and amenity spaces with a tree-lined residential street.

The northern boundary has been carefully designed in conjunction with the daylight and sunlight studies to provide a reactive edge to the northern boundary that limits overshadowing to the allotments and responds to the form of the conservation area to the north. This northern area contains the reorganised allotment spaces that are envisioned as two main parcels, existing and new, connected by a continuous route that runs east to west

**Block Typology**

The proposal seeks to deliver a mix of building typologies within a high-quality public realm and architecture setting. The development would be a mixed tenure scheme to create a socially cohesive neighbourhood - providing new affordable homes for local people and new residents. The unit mix and unit typologies for the redevelopment has been largely dictated by the 2018 masterplan parameter plans and design guidelines, site constraints and building typologies.

Plots 9.3, 9.5 and 9.6 form the last three sub-phases within the Enfield Road character area and are the last remaining block required to facilitate the completion of the western limb of the Acton Gardens Masterplan. The buildings are designed to form a key part of the residential neighbourhood located at the western end of the remaining area of the Acton Gardens Masterplan and when read alongside the existing western phases delivered pursuant to the original 2012 Acton Gardens Masterplan and 2018 Masterplan, these Plots will complete the frontage along the Osborne Road and Enfield Road.



Location of Plots 9.3, 9.5 and 9.6

**Description of Each Plot**

Plot 9.3

Plot 9.3 includes 14 three-storey houses, comprising 8 existing 1960's terraced homes and 6 new terraced homes which closely relate to the existing terrace. The existing houses are proposed to be renovated to improve the street frontage with new elevational materials and reorganised front gardens. The proposed new homes are built with a red brick, with a contrasting brick used to highlight the entrance and group windows.



Private gardens for each home will be provided to the rear; beyond this, there will be an element of the Jerome Tower Allotments, which will also be re-provided, and will be accessed via Enfield Road via a main gate between Plots 9.1 and 9.3; and connected to the remainder of the allotments via a strip of land to the rear of the gardens of the renovated houses.

Plot 9.5

Plot 9.5 comprises 134 new homes and is composed of four 'mansion apartment blocks' set around a courtyard garden. The southeast block rises up to nine storeys, with the remainder of the blocks being six storeys tall. The east and west frontage each comprise of paired apartment blocks accessed from their own daylight core.



The southern frontage consists of a 'linking' gallery block that completes this edge. The northern edge is kept open to increase the light levels to the allotments and break down the northern elevation to the Mill Hill conservation area. The internal courtyard is landscaped and will offer communal amenity space for future residents, as well as doorstep play for under 5s.



The buildings are composed of several block typologies and elevation treatments, that respond to the differing conditions of the residential street network; the allotments to the north, the interior courtyard, and the longer views from east to west.



The reconfigured Jerome Allotments, as well as the associated communal facilities area, are located to the north of the phase.

Plot 9.6

Plot 9.6 delivers a total of 67 new homes in a courtyard composition, designed as a transitional step down from the larger scale Plot 9.5. The western edge comprises of two six-storey apartment blocks designed in the style of and comprising several common elements and materials from Plot 9.5.





The upper floor is designed with stepping terraces, and a shaped corner to create an entrance gateway to the inner street. The southern and eastern blocks are predominantly three storeys and consist of maisonettes. A communal landscaped courtyard is provided in the middle of the phase, which also includes doorstep play for under 5s.



A small portion of the reconfigured Jerome Allotments will run along the north of the phase.

### Housing Mix and Tenure

A mix of 1, 2, 3 and 4 bedroom apartments and houses are proposed across a mix of tenures, including affordable rent and shared ownership. The table below illustrates this mix as units (u) and habitable rooms (hr).

Home	Total	TENURE		
		Private	Shared Ownership	Affordable Rent
1 bed / 2 person	76u 152hr	44u 88hr	7u 14hr	25u 50hr
2 bed / 3 person	22u 66hr	13u 39hr	5u 15hr	4u 12hr
2 bed / 4 person	77u 231hr	48u 144hr	11u 33hr	18u 54hr
3 bed / 5 person	11u 55hr	5u 25hr	1u 5hr	5u 25hr
3 bed / 6 person	15u 75hr	0	0	15u 75hr
4 bed / 5 person	8u 48hr	0	0	8u 48hr
4 bed / 6 person	0	0	0	0
4 bed / 7 person	6u 36hr	6u 36hr	0	0
4 bed / 8 person	0	0	0	0
<b>TOTAL</b>	<b>215u 663hr</b>	<b>116u 332hr</b>	<b>24u 67hr</b>	<b>75u 264hr</b>

Proposed Dwelling Mix and Tenure

All homes have been designed to comply with the Mayor's Housing SPG 2016 and Building Regulations Part M. Of the 215 units being provided, 10% (22 units) will be provided as wheelchair adaptable in accordance with Part M 4(3).

### **Affordable Housing**

A total of 663 habitable rooms are proposed as part of the application for Plots 9.3, 9.5 and 9.6.

A total of 331 habitable rooms are proposed to be provided as affordable housing (264hr as London Affordable Rent and 67hr as Shared Ownership).

This equates to a total 50% provision, which itself is split, as follows:-

- 80% London Affordable Rent; and
- 20% Shared Ownership.

The development will be tenure blind with no distinguishable difference between the appearances of the various tenures of accommodation.

### **Road Layout**

The proposed development includes the initiation of one secondary route and two tertiary routes. The proposed secondary route, Hanbury Road, links Enfield Road and Osborne Road between Plots 9.2 and 9.5, whilst the tertiary routes provide access to and from the reconfigured allotments to the north of the plots.

The Hanbury Road secondary route is already present on-site and was delivered as part of the Plot 9.2 works. The tertiary route separating Plots 9.5 and 9.6 has been given the name 'Willet Way' and is expected to form a landscaped space at the heart of the development.

Vehicular access is provided from the west of the site, from Bollo Lane, which provides opportunities for vehicles to turn onto Enfield Road or Osborne Road.

### **Transport and Parking**

The proposal includes a total of 51 car parking spaces (excluding the space reserved for emergency plant access, located between Plots 9.5 and 9.6) across the site, with 20% provided as active electric-vehicle charging spaces and all remaining spaces being provided with passive EV charging.

The proposed car parking space split is, as follows:

- Plot 9.3: 14 spaces (six new off-street spaces for the new homes and eight spaces retained on the Hanbury Road Spur to the east of 9.3);
- Plot 9.5: 22 spaces (10 courtyard spaces, seven on-street spaces on Osborne Road and 5 on-street spaces on the new street between Plots 9.5 and 9.6), plus one additional space for emergency substation access; and
- Plot 9.6: 15 spaces (six on-plot spaces for the ground-floor duplexes, six on-street parking space on Osborne Rod and three spaces to the Osborne Road Spur).

The proposed parking represents a ratio of 0.23 spaces per home, below the maximum parking limit of 0.3 spaces per dwelling as per the approved Masterplan.

Six spaces would be provided as accessible spaces thereby representing some 20% of the total parking spaces provided.

**Cycle Parking**

Cycle parking is designed in accordance with the London Plan, with each core having access to a bike store.

Family houses and ground-floor flats are designed with bike storage integrated into the front garden design.

For the flats, cycle storage is integrated into the courtyard design via central routes designed as ‘way homes’ these are naturally lit and ventilated but designed with limited visibility at pedestrian level.

5 visitor spaces, in the form of Sheffield stands, will also be provided on-street, located on Osborne Road and Hanbury Road.

The breakdown in cycle parking spaces, in accordance with London Plan standards, is provided below:

	<b>9.3</b>	<b>9.5</b>	<b>9.6</b>	<b>Total</b>
<b>Long Stay</b>	28	242	122	392
<b>Short Stay</b>	8			8
<b>Total</b>				<b>400</b>

**Allotments**

The site also includes the Jerome Tower Allotments, an existing community asset owned and managed by Ealing Council. Jerome Allotments covers 3,704sqm and includes 21 allotment plots of various sizes (comprising 18 individual plots, of which two are subdivided into smaller plots, as well as one community plot), communal facilities, access paths, blocks of established planting and trees and boundary fencing.

**Other Matters**

The reserved matters application was submitted concurrently to details pursuant to the following conditions of the extant 2018 Masterplan Permission:

- Submission of a Daylight and Sunlight Report pursuant to condition 9
- Submission of a Wind and Microclimate Assessment pursuant to condition 10
- Submission of a Wind and Microclimate Assessment pursuant to condition 11
- Submission of a Flood Risk Assessment pursuant to condition 12
- Submission of a Transport Statement pursuant to condition 13
- Submission of a Transport Statement pursuant to condition 14
- Submission of a Transport Statement pursuant to condition 15
- Submission of a Fire Statement pursuant to condition 16
- Details of Open Space Surveys pursuant to condition 17
- Details of Open Space Design pursuant to condition 18
- Details of Active Design pursuant to condition 23



The following discharge of condition applications were also submitted concurrently to the Reserved Matters application details, and are pre-commencement conditions pursuant to this development plot:

- Details of Bat Survey pursuant to condition 25
- Details of Biodiversity Roof pursuant to condition 26
- Details of Sustainable Design and Construction pursuant to condition 29
- Details of SUDS pursuant to condition 34
- Details of Carbon Savings pursuant to condition 37
- Details of Overheating and Cooling for Residential Units pursuant to condition 51
- Details of Travel Plan pursuant to condition 62
- Details of Glazing Strategy and Sound Insulation pursuant to condition 71
- Details of Noise Mitigation pursuant to condition 72
- Details of Noise Mitigation pursuant to condition 73
- Details of Noise Mitigation pursuant to condition 76

**Relevant Planning History**

The current 2018 Masterplan Permission site is included within the 2013 Outline Planning Permission (Ref: P/2012/0708) for the original Acton Gardens Masterplan, which was approved on 13<sup>th</sup> August 2013.

The 2013 Outline Planning Permission included the phased demolition of all 1,695 existing residential units (5,206 habitable rooms [hr]) that were constructed prior to 2001 and their replacement with up to 2,350 units (7,779hr). A total of 1,346 units were delivered pursuant to the 2013 Outline Planning Permission (as amended by the S.73 Application Refs: PP/2014/2142, PP/2014/6303, and 160794VAR), as follows:-

Site	Existing Units	Application	LPA Ref:	Proposed Units	Approval Date
Phase 2	94	Full	2012/0711	106	13 <sup>th</sup> August 2013
Phase 3.1		RM	2013/4132	124	17 <sup>th</sup> March 2014
Phase 3.2	60	Full	2013/4113	116	12 <sup>th</sup> June 2014
Sitewide		S.73	2014/2142	-	14 <sup>th</sup> July 2014
Phase 4	78	RM	2014/5311	107	6 <sup>th</sup> February 2015
Phase 5	160	RM	2015/0016	271	20 <sup>th</sup> March 2015
Sitewide		S.73	2014/6303	-	31 <sup>st</sup> March 2015
Phase 6	122	RM	16079RES	308	24 <sup>th</sup> May 2016
Sitewide		S.73	160794/VAR	-	9 <sup>th</sup> December 2016
Phase 7.1	73	Full	2015/3558	246**	9 <sup>th</sup> December 2016
Phase 9.1	44	RM	174205RMS	68	29 <sup>th</sup> March 2018
<b>TOTAL UNITS</b>		<b>TOTAL UNITS</b>			
631 units existing		1,346 units approved to date			

Subsequently, a hybrid Outline Application LPA (with Reference 182579OUT) was consented by the Council on 24<sup>th</sup> December 2018 (The 2018 Masterplan Permission).

The 2018 Masterplan Permission consented a total of 195,396sqm of new residential floorspace (which the indicative masterplan equates to 1,950 residential units - an uplift of 856 units above what was originally consented in this area), or 6,156 habitable rooms.

On a habitable rooms' basis, 49% would be affordable with a total of 2,453 Affordable Rent habitable rooms and 558 Shared Ownership habitable rooms. The 2018 Masterplan Permission also included details for 203 new homes within Plot 9.2.

A total of 933 units - within Plot 9.2, 9.4, 8.1, 8.2 and 7.2) were delivered (or else under construction) pursuant to the 2018 Masterplan Planning Permission.

This means that overall, 2,279 new homes have been delivered (or are under construction) within the the overall Masterplan.

With the latest plots, under consideration under these proposals for Plots 9.3, 9.5 and 9.6 a total 2,494 new homes would be under delivery by the regeneration of the Estate.

### **Consultation**

#### **Public Consultation**

Twenty-one site notices were placed in the surrounding area, namely, Bollo Lane, Bollo Bridge Road, Osborne Road, Enfield Road, Whelan Road and Castle Close. A press notice was also published in the Ealing Gazette on 27.10.2021. The consultation period expired 17.11.2021.

A total of 10 comments have been received on the reserved matters application, comprising of 8 objections and 2 neutral representations. Accordingly, all the key issues raised through the comments received have been reviewed and assessed by Officers and have been summarised below, followed by an Officer's response to the key issues raised:

#### **Design, Layout and Density**

- Application continues over-development of the area.

#### *Planning Officer's Response:*

*The proposals have been designed to conform with the consented parameters, most notably the Development Plots (ref: 16250-00-07-004), the Illustrative Masterplan (ref: 16250-00-07-008) and the Minimum and Maximum Building Heights (ref: 16250-00-07-006) parameter plans. The proposals will therefore retain the heights, separation distances and relationships with neighbouring existing, emerging and proposed buildings which were consented under the 2018 Hybrid Masterplan.*

- Height of houses on north of Enfield Road should not be higher than 3 storeys, to protect new allotments and houses in the Mill Hill Park Conservation Area.

#### *Planning Officer's Response:*

*The terraced houses on Phase 9.3 will be 3 storeys in height, matching the existing row of terraced houses.*

- House owners on Enfield Road will have small gardens, largely shaded by their houses

#### *Planning Officer's Response:*

*All proposed units, including the new and refurbished homes on Phase 9.3, will have private amenity space which meets the requisite size standards set out in the Mayor's Housing SPG.*

*Like any other residents, the residents of these new homes will be able to also access the ample open space provision throughout the estate.*

- Pleased that the existing terraced houses on Phase 9.3 will be renovated rather than rebuilt.
- Pleased that balconies will not be added to the Phase 9.3 houses.

*Planning Officer's Response:  
We welcome this comment.*

### **Allotments and Trees**

- Removal of trees will spoil the area.

*Planning Officer's Response:*

*As part of the Hybrid Outline Application for the Remaining Masterplan Area, a comprehensive Tree Survey was carried out which identified those trees of high amenity value, those which were to be removed and an indicative plan showing new trees to be planted.*

*The Remaining Masterplan Area layout emphasised the retention of as many of those high amenity trees as possible, whilst supplementing them with a significant degree of additional tree planting.*

*In terms of these Plots, the existing trees on-site have been largely retained and removed in accordance with the Public Open Space and Allotment s Parameters Plan 16250- 00-07-007 of the 2018 Outline Masterplan. However, following a further tree survey in 2021 and further consultation with the allotment holders, LBE Council and residents of the Mill Hill Road Conservation Area, a number of additional trees were subsequently proposed for retention. These are included as part of this application.*

*Additionally, to mitigate for the loss of existing trees on site, new trees will be planted across the development. Several of the new trees will be planted as semi-mature specimens to provide immediate impact within the new landscape scheme*

*A variety of other landscape and biodiversity enhancements are also proposed across the site, including biodiverse roofs, bat and bird boxes, and deadwood refuges, so as to improve the biodiversity value and urban greening factor for the site.*

*The proposed development is therefore considered to continue to deliver a high-quality landscaping scheme which responds to London Plan and LB Ealing requirements.*

- How will trees be managed, particularly with regard to the allotments?

*An Arboricultural Impact Assessment, Tree Protection Plan and Tree Schedule have been submitted in support of the proposed development. These documents assess the value of existing trees and site, as well as the necessary mitigation/steps required to protect retained trees during construction works. Construction of the development will adhere to these requirements to ensure that trees will be properly managed and protected, where required.*

*Condition 40 of the Revised Masterplan states that any trees which die, are removed, uprooted, significantly damaged, become diseased or malformed within five years from the completion of planting, must be replaced during the nearest planting season with a tree/s of the same size, species and quality as previously approved.*

- Layout of reconfigured Jerome Allotments does not compare favourably to 2012 permission.

*Planning Officer's Response:*

*The layout of the reconfigured Jerome Allotments aligns with the layouts approved as part of the 2018 Hybrid Masterplan permission (ref: 182579OUT), as shown on the approved Parameter Plans. This layout has been granted and the detailed design of the allotments has been carefully progressed to ensure that the highest quality is provided in the context of the parameters.*

*The layout and design of the proposed allotments have been subject to extensive stakeholders and community engagement throughout the development of the proposals, and the team have considered and responded to comments received during this engagement. Please see the accompanying Statement of Community Involvement, which provides further detail.*

- Narrow strip of allotment area, north of Phase 9.3, will be un conducive to plant growth.

*Planning Officer's Response:*

*The section of allotment land to the north of the new and renovated Phase 9.3 houses will include the delivery of 8 new allotment plots, which have been determined to benefit from suitable sunlight and wind conditions, thereby allowing for growing to take place. These plots will be accompanied by a series of micro-plots along the allotment path to the north of the existing Phase 9.3 homes. These micro plots will enable future users to grow a variety of produce beyond the re-provided allotment plots.*

*The inclusion of micro-plots was as a result of extensive dialogue with the parks department and existing allotment holders, to maximise opportunities for members of the community to get involved with food growing.*

*Further detail is provided in the Allotment Delivery Strategy submitted as part of the discharge of Condition 21 of the 2018 Hybrid Masterplan, and which is currently under determination under application 215670CND.*

- Allotments seem more likely to become just a picnic area especially if seating areas are provided.

*Planning Officer's Response:*

*Whilst a variety of flexible spaces, which could include communal seating areas, have been introduced, the key objective of the reconfigured Jerome Allotments has always been to re-provide the existing allotment plots to enable existing and future plot holders to grow produce.*

*10 existing plots will be lost as a result of the proposals, and 10 new plots are proposed to offset this loss. Existing plot holders will be afforded the opportunity to continue using the Jerome Allotments, thereby ensuring that any growing present on the site can continue in the long-term, should there be interest.*

*Further detail is provided in the Allotment Delivery Strategy submitted as part of the discharge of Condition 21 of the 2018 Hybrid Masterplan, and which is currently under determination under application 215670CND.*

- Overshadowing from proposed buildings on the Jerome Allotments.

*Planning Officer's Response:*

*Detailed sunlight assessments - in accordance with the Royal Horticultural Society guidance for food growth - have been carried out to support the proposed reconfigured Jerome Allotments.*

*The assessments demonstrate that the majority of the current allotment area struggles to achieve between 3 and 6 hours of direct sunlight in January, November and December. In turn, analysis of the proposed allotments determines that the majority of the proposals will have suitable sunlight from March to September.*

*The proposed allotments will therefore retain a level of sunlight consistent with the existing allotments.*

*Further detail is provided in the Daylight and Sunlight Report, as well as the Allotment Delivery Strategy submitted as part of the discharge of Condition 21 of the 2018 Hybrid Masterplan, and which is currently under determination under application 215670CND.*

- Concerns with security of access to the allotments behind Heathfield Road gardens. Secure by Design should be required as a condition to ensure consultation with a DOCO.

*Planning Officer's Response:*

*A lengthy pre-application consultation process took place with the applicant team, Ealing Council and Jerome Allotment users to inform the design of the reconfigured allotments.*

*Secure by Design formed part of the key stakeholders which were involved in the process. The Secure by Design officers did not raise any substantive issues with the proposals and simply requested that secure gates and railings be provided to all boundaries of the allotment. This request has been addressed in the final design of the proposed allotment and therefore, the allotments are considered to be suitably secure. Notwithstanding this, a condition is recommended to ensure that final details of the boundary treatment for the allotments is submitted for approval.*

*Further detail is provided in the Allotment Delivery Strategy submitted as part of the discharge of Condition 21 of the 2018 Hybrid Masterplan, and which is currently under determination under application 215670CND.*

- Utility buildings such as sheds in the new allotment area should be sufficiently far from any boundary walls or fences, to avoid security issues

*Planning Officer's Response:*

*Any structures have been, and will continue to be, carefully designed and located to avoid any potential security issues. Ealing officers, as well as Secure by Design officers, have been closely involved in the design of the proposals prior to submission. As such, it is considered that the proposed allotments have been suitably designed to offer sufficient protection against crime.*

*Notwithstanding this, an informative is recommended to draw the applicant's attention to this issue*

- Timeframes for new allotments and allotment holders being relocated.

*Planning Officer's Response:*

*The new allotments are expected to be completed in Q2 2022, and decant of existing holders located on phase 9.5 to the new allotments, where applicable, is also expected to commence in Q2 2022.*

*A detailed overview of the delivery strategy and implementation timeline for the proposed allotments has been provided in the Allotment Delivery Strategy submitted as part of the discharge of Condition 21 of the 2018 Hybrid Masterplan, and which is currently under determination under application 215670CND.*

- Are existing plot holders being prioritised?

*Planning Officer's Response:*

*Existing plot holders will be prioritised and afforded the opportunity to apply for a new plot. Please see the Allotment Delivery Strategy submitted as part of the discharge of Condition 21 of the 2018 Hybrid Masterplan, and which is currently under determination under application 215670CND*

- Pleased to see the East and West Allotments on the proposals.

*Planning Officer's Response:*

*The comment is welcome*

#### **Amenity**

- Impact on privacy of Heathfield Road properties

*Planning Officer's Response:*

*The nearest façade to façade distance between existing houses to the north and new development within the estate would be 32m. This is at the easternmost side of the reserved matters site and it represents a significant increase in the existing façade to façade separation distance between these properties.*

*The proposals have been designed to conform with the consented parameters, most notably the Development Plots (ref: 16250-00-07-004), the Illustrative Masterplan (ref: 16250-00-07-008) and the Minimum and Maximum Building Heights (ref: 16250-00-07-006) parameter plans.*

*The proposals will therefore retain the heights, separation distances and relationships with neighbouring existing, emerging and proposed buildings which was consented under the 2018 Hybrid Masterplan.*

*There will be strong separation distances to the properties to the north, along Heathfield Road, by virtue of the placement of the reconfigured Jerome Allotments along the northern boundary of the site, creating a set-back between the existing Heathfield Road properties and the proposed buildings.*

*The careful positioning of balconies also ensures that no additional overlooking or loss of privacy is generated above that which was consented under the 2018 Hybrid Masterplan (ref: 182579OUT).*

- Construction impacts (vibration and cracks) to the homes on Heathfield Road.

*Planning Officer's Response:*



*As required by Conditions 24 and 27 of the 2018 Hybrid Masterplan (ref: 182579OUT), a Construction Management Plan will be submitted and approved by the Council prior to commencement of development.*

*The Construction Management Plan will provide details of how the construction will be managed, including details of noise, dust and vibration mitigation measures to accord with the relevant Best Practice Guidance. It is considered that any unacceptable impacts will be mitigated through the approval of, and adherence to, the Construction Management Plan.*

- Any damage to the boundary wall between Acton Gardens and the Mill Hill Estate should be repaired in a historically appropriate manner.

*Planning Officer's Response:*

*A condition is recommended to ensure that any potential damage to features to be retained is avoided and minimised. Should any damage arise, repairs will be made as required.*

- Building work at the back of Heathfield Road risks flooding, since the lower gardens at the south of Heathfield Road already become waterlogged in heavy rain.

*Planning Officer's Response:*

*The site is located in Flood Zone 1, and is therefore not in an area considered to be at risk of flooding. As required by Reserved Matters Condition 12, a Flood Risk Assessment and Drainage Strategy has been submitted by the application and is being considered under a separate condition discharge application (ref: 216034CND). The Flood Risk Assessment and Drainage Strategy confirms that the site is at low risk of flooding from all sources other than surface flooding; additionally, through the control of surface water runoff for Plots 9.3, 9.5 and 9.6 by the use of appropriate SuDS techniques, the site is no longer considered to be at risk of surface water flooding. On this basis, the overall risk of flooding due to all sources is considered to be low, and the proposals are considered to be acceptable in terms of flooding and drainage*

*Planning Officer's Final Response:*

*Overall, on balance, it is considered that all resident's comments have been adequately addressed and have been given the adequate weighting in terms of assessment of the proposal. More detailed comments in relation to all aspects are provided in the main body of the assessment section of this report.*

**Internal Consultation**

The following officers and departments were consulted on with the details of this application and were requested to review and provide comments on the relevant parts of the proposal, adequate to their expertise. Their comments along with the planning officer's response are summarized below:

Active Ealing	No objection received
Transport Services	No objection subject to S278/38 agreement, planning conditions and minor clarifications on cycle parking, vehicle parking and EVCP.
Energy Officer	No objection subject to S.106 payment towards carbon off-setting. Conditions 29, 37 and 51 (pursuant to 182579OUT) have been recommended a discharge.

Landscape

No objection received but commented on the Allotment Strategy (ref. 215670CND and ref. 216262CND) as follows:

The overall strategy document is clearly presented and includes most of the information needed. The overall increase in area of the allotments and inclusion of new community gardening areas and microplots is especially welcomed. Further information is required on Sunlight mapping, Community Gardening area, Timescale for transfer of plot holders to new plots, Soil Strategy, Delivery Mechanism and Handover, Ecology, Footpaths including Footpaths Widths, ramps, Communal green infrastructure, Proposed new planting, Provision of new composting toilets, watering points, raised beds and community storage, Micro plots sizes, Site clearance green waste arisings and clearance, Enfield Rd vehicle entrance, Orchard, ponds, tree planting and hedgerows, and Large community gardening areas.

**Officer's Response:** *These comments are welcome and reflect the positive engagement between services and applicant during the design and planning stages of the new Allotments. Note that details of sunlight and daylight are submitted as part of this Reserved Matters Application. The additional information requested by Parks & Leisure does not affect the findings of the daylight & sunlight report submitted as part of the RM application, which confirms that the proposed development will be acceptable in terms of its daylight, sunlight and overshadowing impacts both within the proposals and to neighbouring properties and open spaces. As requested by Parks & Leisure, the additional overshadowing plots simply provide sunlight hours data and mapping for the entire allotments footprint, and confirms that all growing areas will receive suitable levels of daylight for horticulture.*

*A condition is recommended to secure the requested additional detailed information.*

Tree Officer

No objection received.

Pollution-Technical Control

No objection received.

Environmental Services (Waste)

No objection received.

Flood Risk Officer (LLFA)

No objection received.

### **External Consultation**

The following statutory consultees, local amenity groups and other organizations were consulted on with the details of this application and were requested to review and provide comments on the relevant parts of the proposal, adequate to their expertise. Their feedback along with the planning officer's response are summarized below:

Designing Out Crime Officer

No objection subject to a planning condition.

**Officer's Response:** *Controls set out in Outline Permission (ref. 182579OUT) already secure the requested accreditation.*

Transport for London (TfL)

No objection subject to clarifying concerns on the cycle parking solutions, widths and spacing.

*Officer's Response:*

*The minimum distance on the site is 1.74m, which is in accordance with the manufacturer's width recommendations. A more detailed assessment in relation to the above aspects are provided in the main body of this report.*

London Ambulance Service	No objection received.
Fire and Emergency	No objection received.
Thames Water	No objection received.
Heathrow Airport Ltd	No objection. Recommendation to discharge condition 26 in relation to Biodiverse roofs. Although it is not anticipated that the use of a crane at this site will impact Heathrow's Obstacle Limitation Surfaces, Instrument Flight Procedures or radar, Heathrow advises the developer that if a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane, as per the requirements set out by CAP1096.

*Officer's Response:*

*An Informative is recommended to that effect.*

Historic England	No objection to scheme.
Historic England (GLAAS)	Archaeology condition 31 is attached to hybrid Outline Planning Permission Ref: 182579OUT requiring archaeological trial trench evaluation. The reserved matters applications for other phases of the development have been accompanied by an archaeological Written Scheme of Investigation, however one has not been submitted with this application.

*Officer's Response:*

*Condition 31 is a pre-commencement condition and therefore submission of details pursuant to the condition are not required at this stage.*

Acton Community Forum	No objection received.
South Acton Residents Association (SARA)	No objection received.
Action Acton	No objection received.
South Acton Councillors	No objection received.
National Air Traffic Control Services (NATS)	No safeguarding objection to the proposal. The proposed development has been examined from a

technical safeguarding aspect and does not conflict with safeguarding criteria.

### **PUBLIC CONSULTATION BY THE APPLICANT**

The applicant submitted a Statement of Community Involvement detailing the consultation carried out with the residents of the Estate and other local residents prior to the submission of the current reserved matters application.

Building on the extensive consultation that was undertaken to inform the 2018 Masterplan as well as earlier phases delivered to date, the Acton Gardens team has continued to engage both with LB Ealing; and as many residents, stakeholders and members of the public as possible to inform the proposals for Plots 9.3, 9.5 and 9.6 Reserved Matters Application.

The consultation process was shaped in response to the coronavirus pandemic and tailored to ensure both safety and accessibility were not compromised. The consultation process included two separate workstreams; consultation on the entire proposals, and a more-targeted consultation aimed at the reconfiguration of the Jerome Tower allotments.

The applicant has confirmed that the comments received were integral to evolving the design.

A specific consultation programme relating to the Jerome Allotments was also conducted with community and individual allotment plot holders and LBE Parks team. These consultation activities, included:

- Three online Consultation Meetings with Jerome Allotment plot holders and LBE Parks team;
- Three site visits to the Jerome Allotments with allotment holders, including marking out the impact of changes on the ground on existing allotments;
- Two online Public Exhibitions with presentations from architects and design team;
- Large Presentation Boards erected on hoarding near Phase 6.2 for residents to view at a time that suits them;
- Emails to plot holders and LB Ealing Parks Team; and
- 1-2-1 appointments via video, phone and email.

In terms of the Jerome Tower allotments consultation, meetings were held with LB Ealing Parks team on 28<sup>th</sup> May 2021, 18<sup>th</sup> June 2021 and 4<sup>th</sup> June 2021, and the team also attended the three consultation meetings with allotment holders.

In summary, the feedback received through the various methods of consultation has been used to guide and inform the final proposal design. In terms of general public feedback, the response was considered to be positive. Countryside welcomed the constructive dialogue with the allotment holder's association, which was useful in developing the design and understanding their requirements.

Specifically relating to the proposals for Plots 9.3, 9.5 & 9.6, the consultation programme has employed various socially distanced and online initiatives to consult with as many residents, stakeholders and members of the public as possible while following the government's Coronavirus guidelines. Consultation activities with residents and stakeholders, included:

- Online Meet the architect session with Community Board
- Online Design Sub-Group Meeting
- Two virtual Community Board Meeting with resident members and stakeholders
- Independent Advisor confidential advice service via phone, email and drop ins
- 1-2-1 appointments via video, phone and email
- Letters sent to residents, stakeholders and neighbours

- Information packs available in the community centre or by post
- Posters in communal areas and noticeboards
- Text messaging to South Acton and Acton Gardens residents
- Emails to local stakeholders
- Two online Public Exhibitions with presentations from architects and design team
- Large Presentation Boards erected on hoarding near Phase 6.2 for residents to view at a time that suits them
- Website updates and information ([www.youractongardens.co.uk](http://www.youractongardens.co.uk))
- Newsletter delivered to whole estate and neighbouring streets

As neighbours to Plots 9.3, 9.5 & 9.6, residents of the Mill Hill Park conservation area were sent invitations to both Public Exhibition events

A summary of the programme of various initiatives relating to these Plots, set out by the applicant are provided below:

- **Design Sub-Group Meetings**
- **Community Board Meeting** with residents and stakeholders
- **Drop-in Surgeries**
- **Independent Advisor Drop Ins**
- **1-2-1 appointments** and home visits
- **Letters to:**
  - Ward Councillors
  - Community Board members
  - Berrymede Junior school and Berrymede Infant school
  - South Acton Children's Centre
  - Local businesses on Bollo Lane and Gunnersbury Lane
  - LBE officers
  - Local Community groups including Descendants and United Anglo Caribbean Society
- **Posters** - displayed across Acton Gardens and neighbouring roads. Text messages were sent to residents and information was featured in the news section of the Acton Gardens website.
- **Text messaging** to local residents
- **Door Knocking** with residents and neighbours
- **Public Exhibitions**
- Updates and information provided on the **website** ([www.yoursouthacton.co.uk](http://www.yoursouthacton.co.uk))

The Acton Gardens Communications Strategy takes a broad approach to engaging with residents and stakeholders through a variety of different methods.

This includes:

- Regular circulation of a dedicated Acton Gardens newsletter
- A bespoke website which offers information on the regeneration and activities available to residents
- An independent advice service for residents with regular drop-ins and home visits
- Housing surgeries which see Acton Gardens, LBE and the Independent Advisor meeting residents and stakeholders face-to-face
- Regular Community Board meetings and an annual AGM which all residents are invited to attend
- Public consultation exhibitions, advertised in advance to the general public through posters and to residents, neighbours and key stakeholders with invitations and event reminders
- Online consultation meetings with the Jerome allotment holders

- Letters, both personal and letter-drop to ensure residents are aware of consultation events and key regeneration events and news affecting them
- Acton Gardens presence at local community events
- Home visits with residents (when requested)
- Poster campaigns, across South Acton and Acton Gardens
- Text messaging to Acton Gardens and South Acton residents

The details within the Statement of Community Involvement adequately conveys the concerted effort Acton Gardens has made to extensively consult with the local community, existing residents and stakeholders, at regular intervals throughout the design development process, using a range of mediums to ensure that as many people are reached as possible.

This commitment has ensured the ongoing regeneration of the estate meets the aspirations of local residents and is in full accordance with National Planning Policy Framework paragraph 128.

The consultation is also considered to comply with the range and scope criteria on large-scale applications set out under Appendix 3 of Ealing's Statement of Community Involvement (February, 2013).

## **APPRAISAL**

The REM has been submitted pursuant to the following conditions of the 2018 Masterplan Permission Ref: 182579OUT (dated 24/12/2018) for the continued regeneration of the South Acton Estate:

- Condition 7 (Reserved Matters Submission) relating to the relevant material planning considerations for a particular Plot, including:
  - a) Appearance;
  - b) Means of Access;
  - c) Landscaping;
  - d) Layout; and
  - e) Scale

and

- Condition 8 (Reserved Matters Details) relating to the relevant documents all REM's must be accompanied by.

### Parameters of the 2018 Masterplan Permission

The 2018 Masterplan Permission for the Regeneration of the South Acton Estate is a 'hybrid' permission, in that planning permission has been granted in outline for the majority of the proposed development, whilst detailed permission has been granted in relation to plot 9.2.

Approved parameters and principles are provided in the approved application documents, in particular within the Design Guidelines (DG), and the Parameter Plans appended to it, to control the nature and timing of reserved matters applications to accord with the assessments undertaken within the EIA of the likely significant environmental impacts of the Scheme.

The 2018 Masterplan Permission is tied to those key parameters and principles in order to ensure that the proposed development is carried out, used and occupied in accordance with the assumptions which underpin the EIA Process and which the Planning Statement demonstrates accordance with.



The DG sets out the updated physical and other parameters and principles to guide and govern the subsequent design and approval of details in accordance with conditions attached to the 2018 Masterplan Permission. The DG identifies aspects of the proposed scheme that fall within the parameters and principles approved under the 2018 Masterplan Permission, and those that do not (the Reserved Matters) which are therefore subject to obtaining Reserved Matters approval.

It is expected that in the future a number of updates will need to be made to the DG as a consequence of REMs and other matters approvals relating to other phases of the development.

The 2018 Masterplan Permission anticipated that the DG would need to be regularly amended as the scheme was delivered, reflecting the scale, complexity and duration of the development. The 2018 Masterplan Permission therefore includes a mechanism via Condition 58 that allows consequential updates to be made to the DG document. There have been no Condition 58 updates made to date that would affect the parameters that relate to Plots 9.3, 9.5 & 9.6.

It is considered that the proposed development relating to Plots 9.3, 9.5 & 9.6 conforms with all of the relevant Parameter Plans, as amended, and this is explained in the appraisal below.

### **Principle of development**

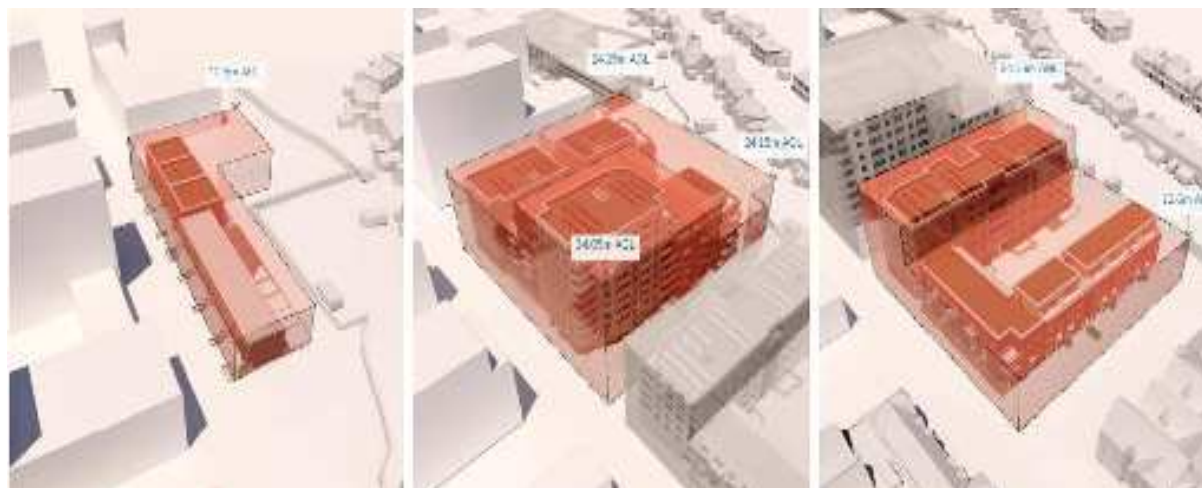
The principle of the proposed residential led mixed-use development for Plots 9.3, 9.5 & 9.6 is established by the 2018 Masterplan Permission. The 2018 Masterplan Permission divides the remaining area of the South Acton Estate site into a series of Development Zones based upon areas of character (as shown on Parameter Plan 02). This Parameter plan assigns a maximum quantum of GEA Residential accommodation (Use Class C3) to promote differentiated neighbourhood characters between the west, central and north of the scheme.

The Development Zones are in turn sub-divided into Land Parcels by the identification of key structural components i.e. primary roads, open spaces, land uses (as shown on Parameter Plan 03). Plots 9.3, 9.5 & 9.6 are located within the Enfield Road Character Area and this Character Area is sub-divided into four land parcels identified as ER1, ER2, ER3 and ER4 on Parameter Plan 03. The supporting text of this Plan identifies the primary use of Enfield Road Character Area as residential. Plots 9.3, 9.5 & 9.6 are located within the ER2 and ER4 Land Parcels and are proposed to be fully residential.



Parameter Plan 03 – Land Parcels and Land Uses

Development Parcel ER2 anticipates low density housing only. Development parcel ER4 (together with parcels ER1 and ER3) in the Enfield Road character area of the scheme are to have a higher level of average overall residential density to take advantage of the proximity and good access to public transport (improving access to public transport associated with Acton Town Station and the High Street with improving connections north to Acton Mainline).



Plots 9.3, 9.5 and 9.6 proposals shown to be wholly within the *Jelly Mould* of the approved parameters

The principles of Layout, Scale, Appearance, Access and Landscaping of the proposed development have been largely established with the outline 2018 Masterplan Permission. The principle of the proposed development including the proposal to demolish existing buildings was approved by the Council in consultation with the Mayor of London under the 2018 Masterplan Permission ref: 182579OUT, dated 24/12/2018.

### Density

The Mayor's Housing SPG and the newly approved London Plan highlight the critical role large sites play in meeting London's housing need and reducing the gap between local and strategic

housing need and supply. For the purposes of the London Plan large sites are defined as those of more than 5ha in size or capable of accommodating more than 500 dwellings. Given their strategic importance to meeting housing need, it requires all large sites to be progressed through a plan-led process to encourage higher densities.

In this case, the application site is identified in policies 1.1(b), 4.1(a) and 4.1(d) of Ealing's Adopted Development Strategy Policy, which give explicit support for the development of these new homes partly within the municipal housing estates, including the South Acton Estate. Inclusively, the sub-text to policy 1.1 clarifies that the development strategy is primarily concerned with apportioning the required growth to the right places across the borough, ensuring that it is well related to the provision of infrastructure, that the design is of high quality, and that it tackles social need.

The Mayor's Housing SPG states that the potential for increased densities should be positively explored and enabled on large sites and in opportunity areas. The London Plan highlights the scope for large sites to determine their own character in terms of residential densities. Indeed, the Mayor's Housing SPG confirms that sites over two hectares typically have the potential to define their own setting in terms of the density ranges.

The need to optimise the use of residential land is a view strengthened by the London Plan Policy D6 which, in light of the significant increase in housing need now recognised, has removed the Density Matrix. Rather, Policy D6 states that in order for growth to be accommodated in a responsible way, densities would have to be developed "above those of the surrounding area on most sites."

The DG of the 2018 Masterplan Permission also provides illustrative residential densities in Section 3.1, which is to be informed and supplemented by the Parameter Plans. There are no average illustrative densities for the ER2 and ER4 land parcel (which include Plots 9.3, 9.5 & 9.6). However, the Site has a PTAL 4-5 and is located in an urban location.

London Plan Policy D3 requires developments to make the best use of land by following a design-led approach that optimises the capacity of sites. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity. The London Plan has therefore sought to provide a different approach to determining density with Policy D2 stating that the density of a development should:

- "1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels*
- 2) be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services)."*

To this end, the London Plan seeks to select appropriate development densities on a site-by-site basis in order to optimise housing and development delivery.

The site area of Plots 9.3, 9.5 and 9.6 measures 1.8ha and 215 units are proposed. This equates to a residential density of 119 units per hectare and therefore it lies comfortably within the 2018 Masterplan Permission average density of 200 units per hectare. However, as noted above the actual residential densities are to be determined through the REM process which incorporate various other controls and standards to ensure high quality is provided.

In terms of location, the submitted Design and Access Statement demonstrates the density of Plots 9.3, 9.5 and 9.6 would be appropriate to its location given its prominent position within

the regeneration site, which is sited alongside a secondary route and within very close proximity to Bollo Lane and Acton Town tube station.

In terms of technical standards the proposals meet or exceed the minimum Technical Housing Standards, provide good levels of daylight and sunlight, provide large amounts of communal outdoor space, are in close proximity to West Park and - the most recent addition to the range of open and recreational spaces – Bollo Brook Park.

As such, within the context of the London Plan, and given both the permitted site densities and the high quality of the design demonstrated through the submitted drawings and Design and Access Statement, it is considered that the density proposed is wholly appropriate

**Affordable Housing**

Policy 1.2(a) of Ealing’s Development Strategy requires that at least 50% of the housing developed in the borough up to 2026 will be affordable housing. Policy H10 in the London Plan states that, where redeveloped, such floorspace should be replaced on an equivalent like-for-like basis in terms of tenure and provision. In addition to this re-provision, such schemes should also seek to further maximise the delivery of affordable housing through Viability Testing as reiterated in the Mayor’s Good Practice Guide to Estate Regeneration.

The Plots 9.3, 9.5 and 9.6 apartment buildings and houses are provided on the basis of their design being ‘tenure blind’, in accordance with the principles adopted by the extant 2018 Masterplan Permission. There would be a balance of private sale, shared ownership and social rented tenure accommodation within each building.



Tenure Distribution across the Enfield Road Character Area (including Plots 9.3, 9.5 and 9.6)

In the case of the shared ownership and private sale dwellings, these would share communal cores in some areas of the apartment buildings. All tenures have equal access to the same communal outdoor amenity space within the centre of each apartment building. The houses

would benefit from private gardens. This approach is common to all of the earlier phases of the Regeneration scheme and is common across the Council’s entire estate regeneration programme.

In general, the different tenures would be accessed from their own dedicated circulation core in order to aid management issues and ensure that service charges and insurances for the social rent units are maintained at affordable levels.

The current paradigm inevitably determines that the proportion of affordable housing within the blocks is highly sensitive to these post occupation management aspects. This, in itself, results in a lack of opportunity to test a clearer form, and therefore also more genuine, delivery of tenure blind blocks where occupiers can mix regularly and freely, irrespective of class, background or housing tenure. It is acknowledged that there should be a continued, persistent and legitimate aspiration to deliver an open blend of tenures within the blocks themselves. To that effect, officers are committed to challenge the current affordable housing delivery model, Housing Associations and Developers alike, in the hope that the advancements on tenure distribution within blocks continues to improve.

Specifically, in terms of tenure, the development would provide 75 units (264 habitable rooms) in affordable rent tenure, 24 units (67 habitable rooms) in shared ownership tenure and 116 units (332 habitable rooms) in open market tenure, which is equivalent to 46% affordable housing on a unit basis and 50% affordable housing on a habitable room basis. The proposed proportion of affordable housing falls marginally short (0.08%) of the recommended 50% affordable housing requirement of policy 1.2(a) of Ealing’s Development Strategy. The shortfall is considered negligible and mitigated by an 80% / 20% split of Affordable Rent/Shared Ownership habitable rooms.

Plots 9.3, 9.5 and 9.6 proposed tenures - on a habitable room basis - are summarised below:

Tenure	Private	Shared Ownership	Affordable Rent	Total
Nos. in hab. rooms	332	24	264	663
		331		
%	50%	20%	50% 80%	100%

Proposed affordable habitable room provision within Plots 9.3, 9.5 and 9.6

Affordable Housing across the Masterplan - Reconciliation

The 2018 Masterplan Permission consented a total of 195,396sqm of new residential floorspace across the Remaining Area of the Acton Gardens Masterplan – which indicatively equates to 1,950 residential units (an uplift of 856 units above what was originally consented in this area), or 6,156 habitable rooms.

The 2018 Masterplan Permission sets a baseline requirement to provide (on a habitable rooms basis) 49% as affordable, comprising a total of 3,011 habitable rooms. Of this provision, 2,453 habitable rooms (81%) would be Affordable Rent and 558 habitable rooms (19%) would be Shared Ownership.

These consented 2,453 Affordable Rent habitable rooms and 558 Shared Ownership habitable rooms would sit alongside the affordable units delivered across the wider Acton Gardens development delivered to date, as set out below:

Wider Acton Gardens AH Delivered to Date				Permitted AH for Remaining Masterplan Area			
Affordable Rent		Shared Ownership		Affordable Rent		Shared Ownership	
units	hab. rooms	units	hab. rooms	units	hab. rooms	units	hab. rooms
<b>2012 Masterplan</b>				691	2,453	180	558
406	1,405	189	513				
<b>Catalyst 2.1 &amp; 2.2 and AGLLP Phase 1</b>							
226	786	115	373				
<b>Total Blend</b>							
3,077 AH hab rooms 936 AH units				3,011 AH hab rooms 871 AH units			
<b>Cumulative Figures</b>							
<b>Affordable Rent</b>				<b>Shared Ownership</b>			
units		hab. rooms		units		hab. rooms	
1323		4,644		484		1,444	
6,088 AH hab rooms/ 1,807 AH units							

*Affordable Housing permitted across the Acton Gardens Development*

The table illustrates that, prior to the Hybrid Outline Masterplan permission, the Acton Gardens Development (which includes both those units delivered pursuant to the 2012 Masterplan and those units delivered earlier as part of Acton Gardens Phase 1 and Catalyst), had delivered a total of 3,077 affordable habitable rooms. Of this, 2,191 comprises Affordable Rent habitable rooms.

When read alongside this provision, the 2,453 Affordable Rent habitable rooms permitted in 2018 would result in the creation of a total of 4,644 Affordable Rent habitable rooms across the development. This fully re-provides and increases upon the 4,641 Affordable Rent habitable rooms that existed across the estate prior to any development commencing in 2005.

In terms of Shared Ownership Units, the 558 habitable rooms permitted in 2018 would result in the creation of a total of 1,444 Shared Ownership habitable rooms across the development. These units are all uplift affordable housing.

Thus far, under the Hybrid Outline Application, Plots 9.2, 9.4, 8.1 & 8.2 and 7.2 have received development permission as summarised below.

Phase	Residential GEA	Private	Shared Ownership	Affordable Rent	Total Affordable Tenure
9.2	20,612sqm	297hr	80hr	215hr	50%
9.4	21,682sqm	312hr	78hr	234hr	50%
8.1 & 8.2	36,036.6sqm	593hr	84hr	374hr	43.6%
7.2	21,682sqm	277hr	52hr	220hr	50%

*Housing delivered thus far within the Remaining Masterplan Area*

The proposed figures for Plots 9.3, 9.5 and 9.6 are as follows:

Phase	Residential GEA	Private	Shared Ownership	Affordable Rent	Total Affordable Tenure
9.3, 9.5		332hr	67hr	264hr	50%



& 9.6					
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*Proposed figures for Plots 9.3, 9.5 and 9.6*

As illustrated in the table above, Plots 9.3, 9.5 and 9.6 would provide 50% affordable housing with an 80% / 20% split of Affordable Rent/ Shared Ownership habitable rooms.

Breaking this figure down further, of affordable rent units provided, 28 of these new homes are 3+ bedrooms for family housing which equates to 37% of the total affordable rent provision (in home numbers).

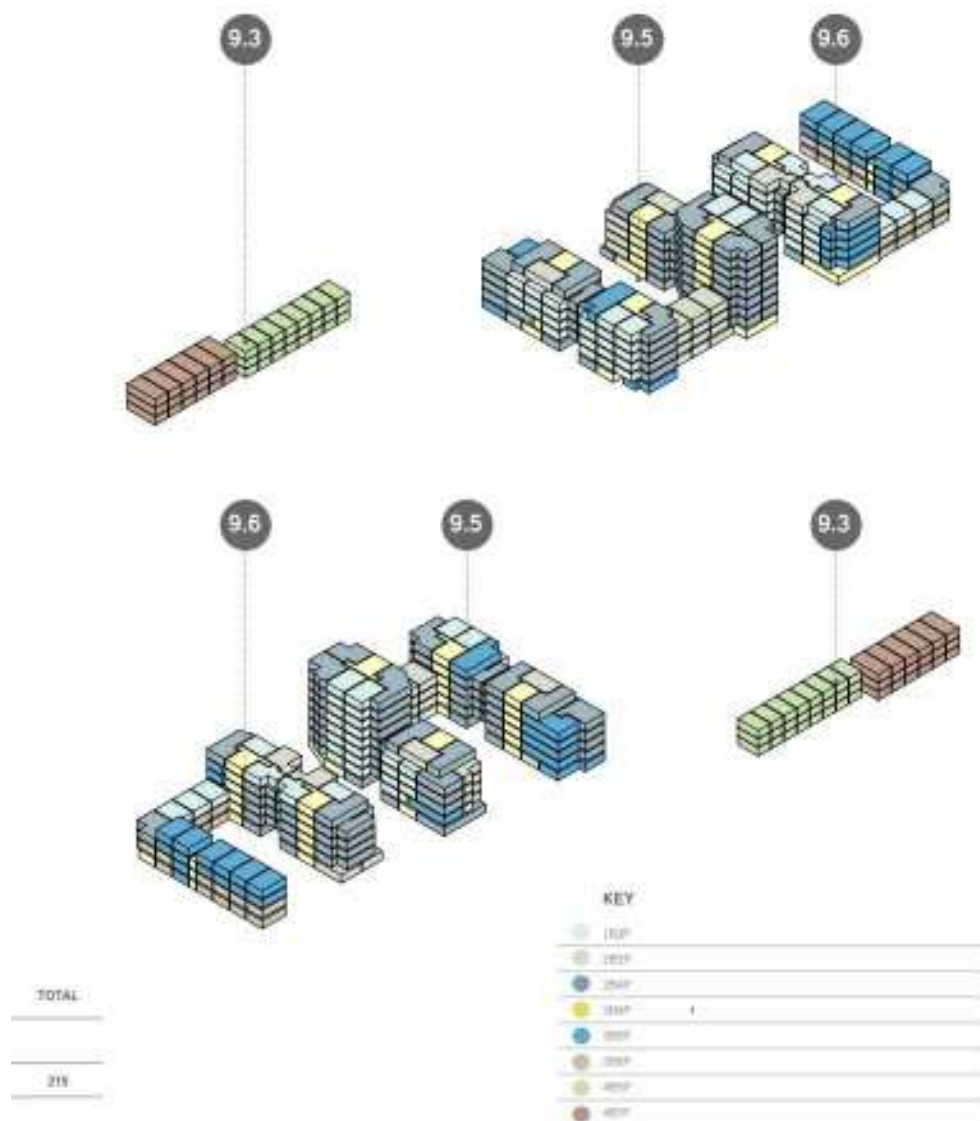
As such, the tenure split meets the permitted 2018 Masterplan Permission requirement and is therefore considered acceptable. Importantly, the provision of affordable rent family homes exceeds the Masterplan requirement of 31% of affordable homes provided. If permitted, it would further LB Ealing’s key commitment to deliver genuinely affordable homes in a range of sizes and tenures for the Borough.

**Housing Standards**

London Plan Policy D4 requires all new dwellings to have adequately sized rooms and convenient and efficient room layouts and notes that internal layout of residential schemes must be as such to allow for easy movement by all occupiers. Spaces should be adequately sized and fit for purpose. Accordingly, dwellings should be designed in accordance with the National Space Standards. The Mayor’s Housing SPG sets out the standards of residential design quality that new schemes should consider in order to be comfortable and usable to provide occupants with the highest quality of living.

In accordance with policy, Plots 9.3, 9.5 and 9.6 have been designed with quality and accessibility in mind. All homes meet or exceed the minimum National Space Standards and are of a legible and usable layout.

Of the 215 units provided, 33.5% are single aspect. The large majority of the single aspect units are located within Plot 9.5 (Shared Ownership and Market Housing) but, due to the use of some rather pioneering design none of the single aspect homes would be north facing.



The remaining 143 new homes provided are dual aspect. This ensures that every unit receives a suitable quality of sunlight and daylight in accordance with Standard 29 of the Mayor's Housing SPG.

In accordance with the minimum floor to floor heights set out in the Design Guidelines, all units in Plots 9.3, 9.5 and 9.6 would have or exceed the minimum internal 2.5m ceiling heights, would include sufficient areas of built in storage and outdoor amenity areas, and would allow for a good level of privacy within and between residential units. Units on the ground or podium levels would be set back behind private terraces or gardens to ensure a provision of defensible space between private windows and passers-by, in full accordance with the requirements of the Mayor's Housing SPG.

#### Daylight within Plot 9.3, 9.5 and 9.6

The applicant's daylight and sunlight assessment demonstrates that over 70% of the proposed accommodation homes would fully comply with the BRE's recommended Annual Daylight Factor (ADF). The analysis of the proposed residential accommodation shows that daylight and sunlight amenity is appropriate for this type of development with the majority of rooms seeing full compliance with the BRE Report daylight guidance. The analysis shows that, when applying the mixed-use room ADF revised targets, the overall compliance rates would be 76%.



Over 61% of the rooms will see direct daylight access to 80% or more of their areas (DD) for both scenarios. The analysis shows that the proposed development would compare favourably with site expectations and the values shown for previously phases of the approved Masterplan

Sunlight amenity testing highlights the urban nature of the site and the area intentions with direct sunlight amenity within some spaces being limited. When reviewing the proposed development against the approved Masterplan the overshadowing analysis does show a greater than expected sunlight access to the proposed amenity spaces. This coupled with the proximity of the public amenity spaces within the wider development area is considered to offset any limitations at a unit level.

Given the character and form of the property and its urban location, the daylight and sunlight amenity of the proposed development is considered to be acceptable. The assessment demonstrates that the development is appropriate in the context of the BRE guide and relevant policy, particularly having regard to the flexibility inherent to the BRE guide and its suburban basis, the urban character of the site and its surroundings and the character of the proposed development. In addition, it is worth noting that the majority of new dwellings would enjoy a dual-aspect and there would be no units with a single north-facing aspect.

#### Accessibility

In terms of accessibility, 90% of the new units are designed to meet Part M4(2) of the Building Regulations and the remaining 10% are designed to meet Part M4(3), in accordance with the London Plan.

#### Passenger Lifts

Condition 54 'Passenger Lifts' of the 2018 Masterplan Permission states that with the exception of buildings up to 4 storeys in height, passenger lifts located within the communal cores serving the approved Blocks shall be installed and operational prior to the first occupation of the relevant part of the Block to which the lift serves.

With the exception of the second floor of the Plot 9.6 proposals, which is served by an external walkway and a combination of staircases and lifts, there are no more than 8 units per core across the scheme.

In addition, Condition 16 'Fire Strategy' of the 2018 Masterplan Permission requires details of the means of escape for all building users, including details of stair cores, escape for building users who are disabled or require level access and firefighting lifts to be submitted to the LPA for approval.

#### Noise

Plots 9.3, 9.4 and 9.6 are positioned adjacent to Osborne Road and Enfield Road to the south. Although these roads are identified in the masterplan respectively as a secondary and tertiary route, both roads are not heavily trafficked. Notwithstanding this, it is worth drawing attention to the fact that the plots are positioned in close proximity to two parks to south and the allotments to the north. Moreover, the homes have been designed sensitively to ensure future occupants would be provided with the highest quality of living. Accordingly, Tetra Tech have prepared a Noise Assessment that was submitted pursuant to 2018 Masterplan Permission Conditions 71, 72, 73 and 76, that illustrates the acoustic mitigating provisions incorporated into the block's design and fabric.

As a minimum, this assessment sets out the acoustic performance of the proposed glazing and building envelope elements, all based on surveys of the pre-existing site environmental noise climate, the interpreted intrusive noise requirements and the plans and specifications of the proposed development.

The Council's noise specialist has expressed no concerns with the proposals and indicated that predicted noise results for all noise sources and the recommended mitigation measures would comply with the conditions and relevant standards. The officer has, accordingly, recommended approval of these conditions.

#### Air Quality

In terms of air quality and pollution mitigation, the building layout, balcony configuration and positioning of internal spaces and rooms has been set out to ensure that future residents of these plots are not exposed to unduly high levels of poor quality air.

#### Secure by Design

Details of the Secured by Design measures that are required by condition 50 of the 2018 Masterplan Permission are set out within the submitted Design & Access Statement and would adhere to the standards established by the earlier phases of development. The Secure by Design Officer reviewed these details and confirmed that these secure by design standards would be met. As such, condition 50 could be fully discharged in relation to Plots 8.1 and 8.2.

#### Amenity

All new residential developments need to make provision for play and informal recreation based on the expected child population generated by the development. Based on the proposed bedroom mix, the development would generate a total yield of 122.2 children – of which 50 will be under the age of 5 and 40 would fall into the 5-11 age bracket. This would therefore generate a requirement for a total of 501 sqm of under-5's play space and 1,220 sqm playspace overall.

The scheme proposes generous landscaped courtyards on Plots 9.5 and 9.6, which provide a total of 779sqm of under-5's play space. The play space would be of a high-quality design and will include a variety of interactive features to allow for greater opportunities to play. Accordingly, the formalised under-5 play provision within the courtyards would exceed policy requirements.

Whilst the proposal does not include any play space for children from the ages of 5 to 11, there are significant opportunities for play within the site-wide open spaces as outlined in the masterplan design strategies. The site is next to two recently delivered parks, both providing diverse play experiences. West Park provides a natural play area, an outdoor gym, table tennis tables, and plenty of space to sit and gather. Bollo Brook Park, which re-opened in December 2020, has a children's play area with an interactive arch, a dedicated 'senior fitness' unit, a floodlit multi-use games area (MUGA) and a footpath circuit for walking and jogging with timber distance markers.

All residential lobbies are up to 220m walking distance from one of these two play areas, which is below the distance from residential units which is recommended for children over 5 years old in the GLA's 'Shaping neighbourhoods - Play and Informal Recreation' SPG.

On this basis, the proposal is therefore considered to provide ample high-quality play space, in accordance with London Plan and LB Ealing requirements.

Overall, it is considered that the proposed development would provide satisfactory level access conditions for future occupiers of the blocks

It is considered that the internal and external space standards for the development are acceptable and that the quality of the development would provide good living standards for future occupants, in accordance with the Mayor's Housing SPG.

The London Plan Policies also require that new homes should be designed as places for comfort and retreat. Accordingly, buildings should not cause unacceptable harm to the amenity of surrounding land, neither should they be adversely impacted upon by existing site conditions. This includes impacts on privacy, wind, noise, and daylight and sunlight

## **URBAN DESIGN**

### Heights and Massing

Good urban design is considered to be fundamental to the provision of an attractive, safe, accessible and sustainable built environment, and to be a necessary condition for the creation of well-designed cities that are more compact and connected. Policy LV7.4 of Ealing's Development Management DPD requires that development should complement the existing street sequence, building pattern, scale, materials and detailing.

The London Plan includes Policies D4 and D6 regarding the design and quality of new housing. Whilst far reaching in terms of its remit, these policies state developments should demonstrate a high quality of design, and should provide comfortable, functional and fit for purpose layouts. In terms of scheme layout, a development should be, *inter alia*, coherent, legible, active and accessible to all. Also of note is Policy D1(d), which states that proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions

The 2018 Masterplan Permission contains various controls in relation to the appearance of the South Acton Estate development. Those of relevance to the proposed buildings at Plots 9.3, 9.4 and 9.6 are explained and assessed in this section.

Section 4.5 of the DAS emphasises the need for buildings to present a limited material and colour palette with each building having a primary material and (other than materials used for windows and balconies) no more than 2 other secondary materials to ensure consistency of character and a coherent, calm appearance of the buildings. Richness and visual interest should emerge through consideration of detailing and materials, rather than large scale gestures or patchwork of colours. In addition, all materials used should be durable and robust to create a stable environment for the community, without the need to rely on high levels of maintenance.

The DG also sets out guidance relating to the appearance and architectural design of buildings. Section 4.5.8 provides examples of palettes for building frontages while section 4.1 provides examples of elevation typologies which are intended to inform the design of the development. Section 4 in general and sections 4.1.2 and 4.1.3 more specifically, set out guidance of frontage detailing and vertical and horizontal articulation, while section 4.1.4 inform the design of prominent corners. Other guidance includes details of doors and entrances, building projections and balconies, breaks in frontages and material. The guidelines are non-prescriptive but rather set a framework for the grain and articulation of the building frontages that relates to the hierarchy of streets and spaces.

Approved Parameter Plan 06 of the 2018 Masterplan Permission specifically sets the height parameters for the development plots.



Southern view

The proposed development comprises two courtyard buildings on Plots 9.5 and 9.6, with townhouses on Phase 9.3.



Osborne Road – Plots 9.5 and 9.6/ Eastern view

Plot 9.3 consists of three-storey houses, both existing and proposed. The new three-storey houses are taller than the existing houses due to current building regulations and standards, which leads to a stepped and varied roofline which responds to site levels.



Plot 9.3 – Enfield Road

Plot 9.5 comprises three six-storey mansion blocks; the northernmost have setback upper floors to limit impact on the allotment edge and reduce visibility from the Conservation Area. The south-western block carries the mass to the full height on the prominent park corner. The south-eastern block is nine storeys with a chamfered edge that acts as a marker to the central street and as part of the architectural sequencing along this east-west throughfare.

Plot 9.6 comprises two linked six-storey blocks with a setback top floor and chamfered corner to limit impact on the allotments and complete the 'threshold' set up by mirroring the building on plot 9.5.



Osborne Road – Plots 9.6 and 9.5/ Western view

The heights of the proposed buildings reflect the parameters plans consented under the Hybrid Outline Application and carefully respond to the wider context and built form surrounding the site.

#### Architectural Design and Layouts

The scheme for these plots proposes two courtyard buildings on Plot 9.5 and 9.6, with townhouses on Plot 9.3. The proposed buildings have been arranged to conform to the development plots consented under the Hybrid Outline Application, with the reconfigured Jerome Allotments positioned to the north of the plots, along the Masterplan area's boundary with the Mill Hill Conservation Area.

The orientation and layout of all buildings ensures active frontages to all sides and passive surveillance over the wider area. In keeping with the design guidance, the buildings proposed on Plots 9.5 and 9.6 include ground-floor maisonettes/flats with private front doors onto the street, thereby ensuring a human scale and enhancing the development's active frontages.





Entrances to blocks



Entrances to townhouses and Maisonettes

With regard to appearance and materials, the proposals have been designed in accordance with the Design Guidelines of the Masterplan Application. The consistent design language used across the proposal ensures the various elements relate to each other, both within the site and the wider Masterplan.

The material palette is predominantly brick, using as its base a paler buff or light pink brick, a darker red brick and intermediate brick mix that picks up elements of both. Two mortar colours and different brick bonds are used for further variation across the three phases. Stone effect sills copings and headers are used as a reference to the local context providing varying degree of contrast with the brick palette.



Material Palette – Bricks and Railings Pattern

Windows are designed with a full brick reveal giving a depth to the façade treatment, all windows are cleaned from the inside, and generally have a raised sill except where full height windows are used as vertical ‘breaks’ in the elevation composition. Full height windows have a Juliet balcony.

Windows, metalwork, and rainwater pipes are polyester powder coated; a consistent pale grey-green colour is used across brick types to compliment the red tone of the brick work, but provide unity across all phases. A secondary paler colour is used to highlight entrances and areas of interest.

The proposed elevations showcase a clear hierarchy of a base, middle and top, with a different emphasis based on the building's scale and how they are seen and approached from the street or afar.



The proposed homes on Plot 9.3 are built with a red brick, with a contrasting brick used to highlight the entrance and group windows. Furthermore, the existing homes are re-clad in brick with new windows, maintaining the existing proportions but improving performance.

The proposed building on Plot 9.5 is composed of several different typologies to respond to the different context across the site.

The western and eastern elevations are composed from a calm palette of brickwork, slim profile metal work balconies and well-proportioned and balanced window arrangements. The base uses a darker mortar to ground the buildings around the ground floor homes and front gardens. Entrances are highlighted using the contrasting light brick within the double height core entrance spaces and around the ground floor flat front doors.

The southern elevation comprises of a range of typologies, giving the elevation a more characterful feel as part of the varied architecture across the masterplan. Corner balconies are inset within the building form and are designed as 'garden balconies'. The southern aspect means architectural features are used to provide shading to the windows with projecting headers, and a bespoke railing design is used on the central element to create dynamic shadows through the day.



Corner Balconies

The upper floors of the northern blocks are setback and built using lighter brickwork with generous terraces, a pre-cast coping defines the tops of these blocks. The southern blocks have a full top floor to strengthen the building form on these more prominent corners, again pre-cast copings are used to dentine the top floors.

The proposals on Phase 9.6 mirror the treatment of the Plot 9.5 building, thereby completing the internal street which separates the two phases. The articulated south-western corner completes the opening into the central street and transitions to the south elevation which has a greater vertical emphasis in keeping with the character of Osborne Road.

The lower scale gallery blocks are to be read as a row of town-houses that turn the corner to complete the eastern elevation, the red brick is used with contrasting copings, sills and entrance surrounds that reflect the character of the school opposite and the conservation area. The eastern maisonettes have a setback brick floor using the lighter brick colour to be read as part of the roof form.

#### Heritage

The outline proposals approved under 182579OUT were subject to full EIA.

The originally submitted ES chapters 7: Townscape and Visual Effects and chapter 12: Heritage, were supplemented with a number of wireframe visualisations, and additional analysis of the potential for visual effects of the assets to the west at Gunnersbury Park.







The conservation area covers an area of late 19th and 20th century housing that was historically separate from the poorer areas to the south.

The Mill Hill Park conservation area was designated in 1993 and the conservation area appraisal and management plan were adopted in 2007.

The heritage chapter of the EIA for the approved outline consent was supported by a desk-based heritage assessment (Terence O'Rourke, 2011) which gave a full account of the history of the area.

The settlement at Acton is of Saxon origin and much of the area was predominantly rural until the 19th century. The rapid development of the area followed the enclosure of the common fields in 1859. The initial phase of new building in the area from the 1860s was of middle class housing, generally in the form of paired villas, on Mill Hill Road, Avenue Road, Church Road and Gunnersbury Lane.

In 1877 the Mill Hill Park estate was laid out as a private estate of large building plots for individual houses. The estate was walled, retaining the original boundary of the earlier parkland to the south. The development of the estate was slow, and many of the houses were completed during the early years of the 20th century, in varied Arts and Crafts and vernacular revival styles that contrast with the earlier Italianate houses to the north of Avenue Road. A significant proportion of the houses in the southern part of the conservation area are pairs of semi-detached houses of suburban type constructed in the 1930s.

To the south, the boundary of the conservation area designation is the early 19th century estate wall that divided the middle class suburb from South Acton. The other edges of the conservation area show the contrast and the abrupt change that resulted from the mid 20th century estate clearance and redevelopment. The Mill Hill Park area retains its historic sense of separation.

There are two distinct phases of development within the conservation area; the rows of paired villas on Mill Hill Road and Avenue Road built from 1860, and the later, less uniform development of large houses in spacious plots on Avenue Gardens, Avenue Crescent and Heathfield Road to the south, which dates from the early years of the 20th century to the 1930s.

The conservation area is characterised by the variety produced by the range of building materials visible, including the shades of red and orange brick, the use of stucco and pale render and some roughcast. There are a wide range of decorative features to porches and windows, particularly for the houses from the Edwardian phase, and of boundary treatments.

The enclosure created by the trees along the roads and within gardens and boundaries is an important aspect of the character of the conservation area as a clearly defined residential area, as is the central area of public gardens. The adopted conservation area appraisal confirms that the significant views in the conservation area are internal except for the view at the edge on Mill Hill Road looking east towards the significant landmark of St Mary's Church in Acton town centre.

The wider setting makes little positive contribution to the conservation area, although the immediate setting of well vegetated boundaries on the south (reinforced by the survival of the early estate walls) and east edges of the designation are of value in preserving the historic distinction and in visually screening some of the surrounding development.

The existing buildings at the site and the ongoing construction works are intermittently visible from the roads within conservation area between and above the houses, in particular the taller

elements such as Jerome Tower, and the blocks on the approaches from the east on Mill Hill Road and Avenue Road.

#### Assessment of Effects

The overall approach taken and the detail of the appearance and materiality of the development for plots 9.3, 9.5 and 9.6 are outlined in the Design and Access Statement. The guiding design principles are to continue the approach seen across the award-winning completed earlier phases of the regeneration at Acton Gardens.

The primary materials are brickwork, in a palette of colours ranging from buff and pale pink, through intermediate shades to a darker red, with some use of contrasting paler stone-effect dressings for sills and coping. Windows and other metalwork are a pale grey-green colour throughout to ensure unity across the development. Other visual interest is provided by the detail of the bonding, including feature panels and patterned brickwork, the balconies and the use of vertical gardens at the corners of the taller elements. Only the upper sections of the buildings would be visible from the conservation area to the north and the landscaping and treatment of the improved public realm at ground level will not be perceptible.

The impression of separation created by the fall in the topography, and the open space of the allotments closest to the former wall of the Park Hill estate is preserved. Additionally, the height of phase 9.3 has been maintained at three storeys to maintain the transition in scale to the buildings of the conservation area. The visual presence of the taller elements is reduced as part of the emerging new character created by the demolition of the old estate, the completed new blocks and those currently under construction.

The views from the central Mill Hill Gardens shows the extent of the tree cover within the park and on the boundaries of adjacent properties, and its effects in screening all but the taller elements of the buildings to the south. The current view is dominated by the 17-storey Jerome Tower, which is to be demolished as part of phase 9.6. A visualisation prepared by Terence O'Rourke illustrates the detail of the profile of development in the wider setting of the conservation area, seen through the trees and above the houses.



The wider mixed urban setting of the conservation area currently makes only a limited contribution to the significance of the assets. The changed appearance of the development visible beyond the conservation area boundaries at points on the circuit of roads is predicted to be a small beneficial change, corresponding with the minor beneficial effect identified in the EIA on the approved outline. There will be no effect on the qualities of enclosure or the historic separation that are part of the distinctiveness of the area.

The primary materials and the architectural details for the buildings have been chosen to relate well to the surrounding context.

As such, it is considered that when visible from within the conservation area, seen between the houses and through the trees in Mill Hill Gardens, the buildings of Plots 9.3, 9.5 and 9.6 will have a complementary and harmonious appearance, and will not compete with or distract from the architectural qualities of the more decorative houses or the varied character of the area as a whole.

In regard to effects on the townscape and visual assessment from Mill Hill Park, there will be no changes to the effects as previously assessed as a result of the reserved matters proposals.

#### Building Connections

William Willett, a former local resident and developer of the Mill Hill conservation area was a keen promoter of the idea of Daylight Savings and British Summer Time to benefit lifestyle, economy, and efficiency.

The buildings for Plots 9.3, 9.5 and 9.6 have been designed with consideration of how daylight passes across the buildings throughout the day and year. This has had practical implications in terms of the window scale and layout to avoid overheating and improve internal daylight levels and has wider implications of how light reaches the growing areas of the allotments.

Several other aspects have been designed into the proposals to reference the legacy and influence of Daylight Savings and provide visual interest and depth as light passes across the elevations of the new buildings. These design references include the proposal to name one of the new routes “Willet Way”, masonry detailing, landscaping and balcony strategies that interact dynamically with daylight.



William Willett also operated a brickfield in Acton, from which bricks came for his property developments in Mill Hill Park and elsewhere in London. The colour of the distinctive red brick is picked up in the new lower scale buildings that edge the development. To provide a ‘soft’ development edge a brick mix is proposed on the intermediate buildings, while a paler buff or light pink brick is proposed on the taller block where it meets the newer development which has its own distinct character. The range of character across the scales of buildings aid to break down the demarcation between the Acton Gardens Masterplan and the surrounding context.

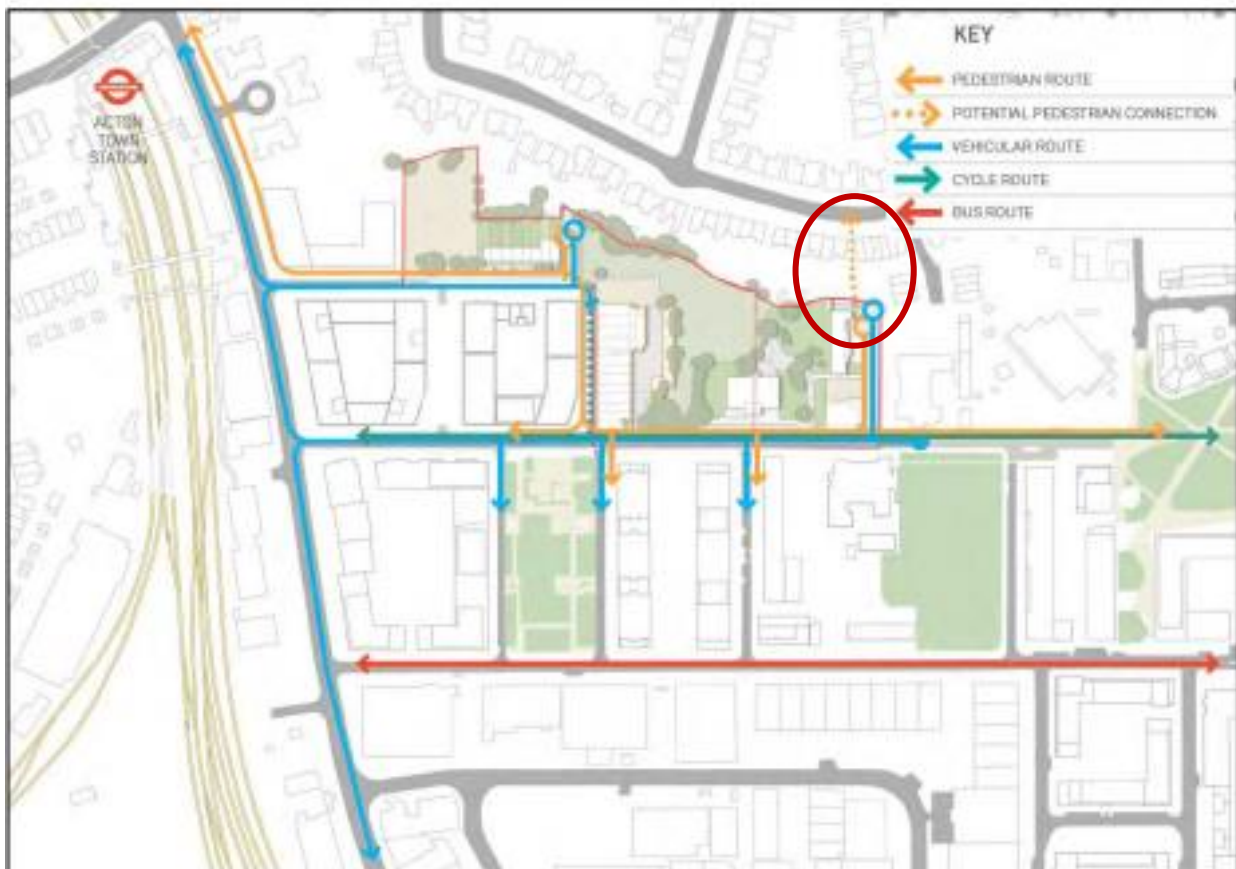




William Willet Memorial and southern elevation of new blocks

### Building 'Bridges'

As anticipated during the Masterplan discussions, there is a potential for a new link between the site and the Mill Hill Conservation Area. Whilst the delivery of this potential route is not within the gift of the applicant, the general proposals for these plots, the proposed building layouts and circulation arrangements seek to ensure that the establishment of this route is not precluded in the future.



Circulation arrangements within Plots 9.3, 95 and 9.6

Conclusion

The proposals are therefore considered to be acceptable in respect of their impact on neighbouring heritage assets.

Historic England was consulted as part of this application and declined to comment, whilst offering no objections to the proposals for Plots 9.3, 9.5 and 9.6.

### **Landscape and Amenity Space**

The public streetscape will incorporate car parking, visitor cycle parking, pedestrian footways, street trees and planting. Additionally, the tertiary street between Plots 9.5 and 9.6 will form a shared surface, with priority given to pedestrians. The design of this shared surface is to encourage motorists to drive with care, thereby allowing a wider range of activity on the streets contributing to the quality of the residents' way of life. At the entrance to the street, feature trees and large ornamental plant beds are proposed to assist in providing an entrance character and help to soften and anchor the built form.

Street lighting will be column mounted and provided in accordance with Ealing Highway adoptable standards. In the courtyards, lighting will be provided in the form of short lighting bollards, set out at key locations within the planting beds.

The allotments site will not be lit. This strategy has been discussed with LBE's Park team and the allotments holders, who believe the allotments are not in use after dark and the facility is not required. Other external lighting will be mounted to the building to illuminate ground floor private terraces and balconies in accordance with Acton Gardens standards.



Lighting strategy

Communal amenity space, including play space (addressed in further detail below), will be provided within the ground-floor courtyard gardens on Plots 9.5 and 9.6. The courtyards are proposed with high-quality hard and soft landscaping, notably including spaces for small events to be held, seating, planting, informal and door-step play and general recreation.

Linear and rectilinear shapes informed by allotment patterns are the inspiration for the courtyard layout. This concept breaks the courtyards down into interesting areas which provide different rooms of varying size and function. In addition, the rectilinear forms provide visual interest for upper levels. Across both courtyards the Events Area, the largest room, includes fixed benches, tables and chairs offering seating opportunities to the edge and a wider space in the centre for residents gatherings, barbecues and other social events. Pergolas with fragrant climbers and trees assist in humanising the spaces and providing dappled shade.



Plots 9.5 and 9.6 – Proposed Courtyards

Quiet rooms offer more intimate spaces for smaller groups to relax and socialise. Fun lounging platforms provide more relaxed seating options. The courtyard spaces also include informal door step play features, with balance beams and stepping stone explorer paths that link the different courtyard rooms and encourage imaginative play. The rooms are reinforced with hedges which provide privacy and also a fun element for children. The courtyards slope from north to south and low brick walls assist with the level change.

With regard to private amenity space, all upper-floor dwellings on Plots 9.5 and 9.6 will have access to a private balcony. The proposed ground-floor dwellings, including the new homes on Plot 9.3, will have direct access into their own private garden or terrace.

In terms of children's play space, play provision for children aged 0-5 (Doorstep play) is included within the communal courtyards of Plots 9.5 and 9.6, measuring a combined total of 779 sqm. Physical and social play form the two main categories of play and the courtyards see both elements being addressed. The courtyards will include a variety of interactive features such as stepping stones, to allow for greater opportunities to play.

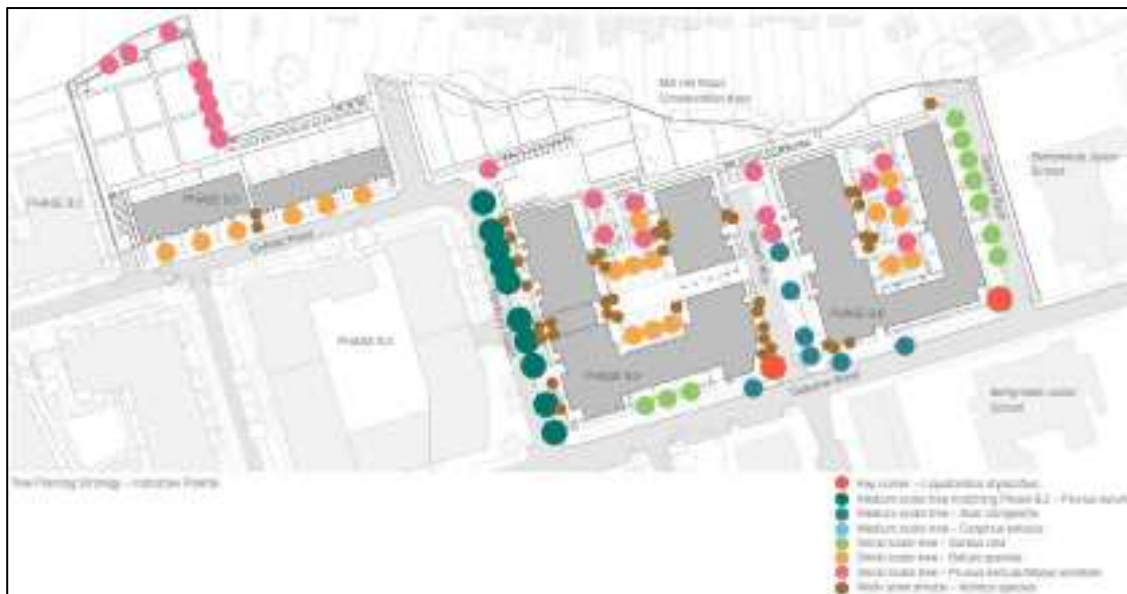
#### Trees

The existing trees on-site will be largely retained, or if removed, this will be in accordance with the public open space and allotments parameters plan 16250-00-07-007 of the 2018 Outline Masterplan. However, following a further tree survey in 2021 and further consultation with the allotments holders, LBE Council and residents of the Mill Hill Road Conservation Area, a number of additional trees are now being proposed for retention.

To mitigate for the loss of existing trees on site, new trees will be planted across the development. Several of the new trees will be planted as semi-mature specimens to provide immediate impact within the new landscape scheme.



The tree planting strategy seeks to deliver a number of new trees along Enfield Road, Hanbury Road, Osborne Road and the Osborne Road Spur, with tree species to be selected in relation to the street and open space hierarchy.



Tree Planting Strategy

Biodiverse roofs will also be provided on the large majority of the Plots 9.5 and 9.6 buildings, and further ecological enhancements such as bat and bird boxes and deadwood refuges will also be delivered across the site.

#### Urban Greening Factor

In accordance with the requirements for Condition 8 and the New London Plan policy G5 (Urban Greening), the Urban Greening Factor (UGF) has been calculated for the combined Plots 9.3, 9.5 and 9.6. The calculation is done in accordance with the methodology attached to policy G5. The UGF seeks to ensure proposals ‘contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping...’

The landscape proposals seek to maximize the use of soft landscaping while addressing the site constraints and ensuring suitable provision of pedestrian access. The design of the biodiverse roof has been enhanced to maximize species diversity, as has the planting within the two courtyards.

A high number of new trees and specimen shrubs are proposed to help anchor the new buildings within their settings and to enhance the pedestrians experience at street level and visual amenity of the residents at higher levels. These measures seek to maximise the sites UGF calculation.

The applicant calculates the UGF for the combined three plots would be 0.2793 against a target score of 0.4, as outlined in policy G5 of the New London Plan. This difference is due to the size and scale of the 9.5 and 9.6 blocks, which have been heavily influenced by the parameters of the 2018 Outline application and the needs of the ongoing decant of residents, which in turn dictates the size of the communal and private amenity spaces. This constrains the UGF, which is considered acceptable given the site’s urban context and the proximity of other substantial green open spaces such as West Park.



Play Strategy

Plots 9.3, 9.5 & 9.6 as proposed would generate a total yield of 122.2 children, of which, 50.1 will be under the age of 5 and 40.2 would fall into the 5-11 category. This would therefore necessitate the provision of a total of 501sqm of under-5’s play space. Play provision of 779 sqm is proposed for children aged 0-5 (Doorstep play). This would be included within the communal courtyards of Plots 9.5 and 9.6.

The layout proposed for these courtyards allows young children to develop their physical fitness by running, skipping and scooting and additional features (such as stepping stones) offer specific opportunities to develop balancing and jumping skills. The proposals also include informal tunnels - formed by structural hedges – to offer a fun environment with areas to explore, spaces to hide and quiet spaces to rest.

The adjacent allotments site creates a natural and rich backdrop to the courtyard space, and raised planters within the courtyards to encourage residents and children to grow their own produce and provide opportunities to learn through play.

Play for older children is provided within the site-wide open spaces. The site is next to two recently delivered parks, both providing diverse play experiences; with West Park providing a natural play area, an outdoor gym, table tennis tables, and plenty of space to sit and gather; and Bollo Brook Park - which opened in December 2020 - providing a children’s play area with an interactive arch, a dedicated ‘senior fitness’ unit, a floodlit multi-use games area (MUGA) and a footpath circuit for walking and jogging with timber distance markers.

All residential lobbies are a maximum of 220m walking distance from one of these two play areas, which is below the distance from residential units. These distances are compliant with recommended maximum distances for children over 5 years old in the GLA’s ‘Shaping neighbourhoods - Play and Informal Recreation’ SPG

Allotments

The proposals include the reconfiguration of the existing Jerome Tower Allotments. As a result of the reconfiguration, 1,827sqm of existing allotment land will be replaced by the provision of 2,425sqm of new allotment land. The new allotment site will therefore be 4,300 sqm in size, 596 sqm larger than the current 3,704 sqm facility.



The reconfigured allotments would remain broadly in the same location, to the north of Jerome Tower, with a new area delivered to the west of the existing allotment land and to the north of Plot 9.3. New facilities would be provided to the west of Hanbury Road.

As part of the scheme, a range of plot sizes are proposed including traditional plots and micro plots in smaller raised beds. With the allotment site expanded in size from that proposed at

outline stage, it is intended to accommodate *Cultivate London* on site, providing a community resource for participating in horticultural activity. Alternatively, this space can also function as a community area for holding small events.

The allotment site includes various benches, community plots and covered pergola structures to provide space for users and visitors to congregate and socialise.

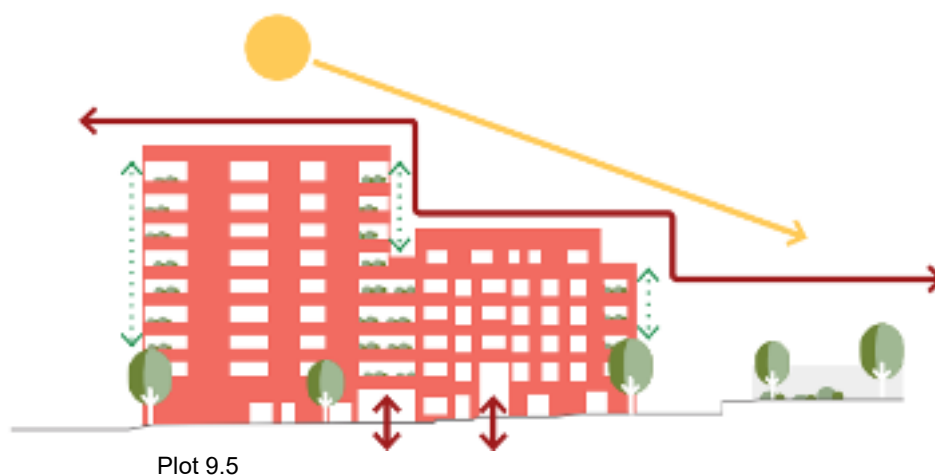
Following consultation with users, a range of facilities are also proposed on the allotment site to support people. Facilities proposed include:

- toilets,
- irrigation points,
- composting facilities, and
- communal sheds for storage.

Full detail of the allotments can be found in the Jerome Allotments Delivery Strategy document submitted as part of the discharge of Condition 21 of the 2018 Masterplan (application ref: 215670CND). The full detail on the Allotments Delivery Strategy can be found under this application. The Allotment Strategy application was subject to extensive consultation with Ealing Parks and the existing allotment holders. Following a positive recommendation by the committee, the application for Condition 21 is thereby recommended for consequential approval.

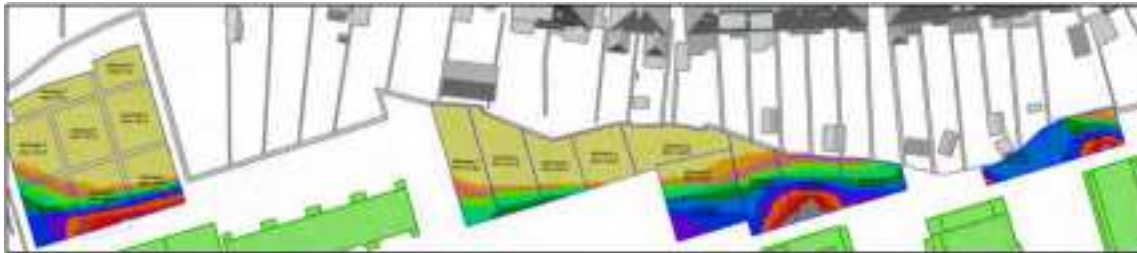
The council parks services are satisfied with the increased allotment area, layouts, infrastructure and proposed overall strategy; however specific detailed information of proposals is required by Ealing Parks Services for approval. The information required includes, details of: Community Gardening area, Timescale for transfer of plot holders to new plots, Soil Strategy, Delivery Mechanism and Handover, Ecology, Footpaths including Footpaths Widths, ramps, Communal green infrastructure, Proposed new planting, Provision of new composting toilets, watering points, raised beds and community storage, Micro plots sizes, Site clearance green waste arisings and clearance, Enfield Rd vehicle entrance, Orchard, ponds, tree planting and hedgerows, and Large community gardening areas. An additional condition of consent is recommended to that effect.

The northern boundary has been carefully designed in conjunction with the daylight and sunlight studies to provide a reactive edge to the northern boundary, that limits overshadowing to the allotments and responds to the form the conservation area to the north.





The analysis of the proposed allotments has been undertaken for the area as a whole with the allotment boundaries overlaid onto the assessment. Looking at the whole site it can be seen that some restrictions will be noted due to the reconfiguration of the allotments and the proximity to the proposed development.



Proposed Allotments – March Sunlight Hours

However, the study concludes that the majority of the proposed area will see Partial (semi-shade) and Full Sun conditions from March to the end of September, which is the key food growth period. A grainier assessment of the proposed plots layouts shows plots A7 to A10 and plots A and B will see the greatest restrictions, with their growing season being more restricted to the period between April to the end of August.

Concerns have been expressed regarding the security of the allotment areas and possible access to the gardens located to the north. A condition requiring details of boundary treatment and security measures for the allotment areas is recommended to that effect.

### Impact on Neighbours

Policy 7A 'Amenity' of Ealing's Development Management DPD requires that new development does not erode the amenity of surrounding uses or the site itself and takes reasonable steps to ameliorate emissions. The application site adjoins existing residential properties to the south. To the north Phase 9.1 is nearing completion and first occupation is imminent.

The application site is bounded by roads on all sides. However, as the final block in this portion of the wider development to be constructed alongside Bollo lane, it has been sensitively designed in terms of massing in order to respect the sunlight and daylight of the existing occupied units to the south (Phase 5), and the soon to be occupied units to the north (Phase 9.1) and west (Plot 9.2).

### Daylight and Sunlight

A Daylight and Sunlight Assessment was submitted with the reserved matters application in order to assess the impact of the proposed development on the lighting levels to neighbouring residential properties, the impact of the proposed development on the lighting levels of future development plots, as well as the overshadowing (permanent sunlight amenity analysis) of the existing allotments. The technical analysis has been carried out in accordance with the BRE Guidance 'Site Layout Planning for Daylight and Sunlight: a guide to good practice' (hereafter BRE Guidelines).

The various methods of assessment within the report can be summarised as follows:

Average daylight factor (ADF) calculations can provide a quick overview of the overall level of daylight within a room, and can be useful when comparing different design solutions. An average daylight factor value of 2% for kitchens, 1.5% for living rooms and 1% for bedrooms should be attained.

The Vertical Sky Component (VSC) test measures how much diffuse daylighting (DD) enters a room, and how this would be affected by nearby development. A noticeable reduction in diffuse daylighting would occur if:

- the vertical sky component ['VSC'] measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value; or
- the area of the working plane (0.85m above floor level in residential properties) in a room which can receive direct skylight is reduced to less than 0.8 times its former value.

Annual Probable Sunlight Hours (APSH) measures levels of direct sunlight into a window, and levels would be noticeably affected if the window:

- receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March; and
- receives less than 0.8 times its former sunlight hours during either period; and
- has a reduction in sunlight over the whole year greater than 4% of annual probable sunlight hours.

Where testing is on new-build development, the appropriate values can be set by comparing to existing similar development, in this instance, constructed development within the Acton masterplan).

The VSC, DD and APSH analysis shows that the majority of neighbouring windows (96% VSC and 100% APSH) and rooms (99% DD) will remain fully compliant with the BRE Report guidance. Where VSC (daylight) impacts are noted they are highly localised, i.e. 39 Osbourne Road, 1-31 Larkin Mansions, 11 Osbourne Road and 1-27 Auden Court with all these properties being located within the estate.

A review of the detailed analysis results shows that the windows transgressing the VSC criteria are predominantly secondary windows serving rooms with multiple windows, windows serving bedrooms (the BRE Report is primarily concerned with daylight to living space) or windows where the current VSC value is significantly below the guidance (whereby even with a very modest reduction in quantum would manifest as a significant percentage change).

DD analysis has been undertaken for all neighbouring properties. This analysis is based on planning details of interior arrangements for tested properties where possible, or reasonable estimates based on the information available for neighbouring properties of a similar build where specific detailed arrangement plans are unavailable. The DD analysis shows that 99% of the rooms would remain compliant with the BRE Report DD criteria. The only transgressions noted occur to a small number of bedrooms within 1-27 Auden Court, also within the existing estate.

The BRE Report is primarily concerned with daylight within living spaces. Transgressions within bedrooms are considered to be of lesser consequence. As such, the noted DD transgressions are not considered to be significant.

APSH analysis shows all of the tested windows (100%) will maintain full BRE Report compliance.

#### Overshadowing

Analysis of the overshadowing on neighbouring amenity spaces and the adjacent proposed allotment areas has been undertaken using the BRE Report guidance test date of the 21 March. The analysis determines how much of the proposed spaces will see two hours or more sunlight access on that date. The guidance target is 50% of the tested area.

The studies undertaken are for any neighbouring space where there is the potential for overshadowing to occur. This includes the gardens to the rear of 53 to 71 Avenue Gardens and 36 to 60 Heathfield Road. Analysis of the residential gardens (53 to 71 (odds inc.) Avenue Gardens and 36 to 60 (evens inc.) Heathfield Road) shows that all the spaces would comply fully with the BRE Report guidance for 21 March. Analysis of the proposed adjacent allotment area shows that sunlight amenity to the area will meet BRE Report guidance with all of the proposed allotments seeing 2 hours or more access on the 21 March to the majority of their areas.

Both of the nearby public open spaces, West Park and Bollo Brook Park, are to the south of the proposed development and would remain unaffected by it.

#### Allotments

Additional sunlight analysis of the allotments has been undertaken. These assessments have looked at the current and proposed allotment areas and studied the sunlight duration at 30-minute intervals on the 21st of each month. The findings have been colour coded and the key to each is shown on each drawing. This detailed analysis is discussed in Appendix 7.

#### Conclusion

As such, the Daylight and Sunlight Assessment demonstrates that the Proposed Development of Plots 9.3, 9.5 and 9.6 would not materially affect the daylight and sunlight amenity of the existing properties surrounding Acton Gardens; neither would it adversely impact or prejudice the daylight and sunlight received by those adjacent properties within Acton Gardens including within the Mill Hill Conservation Area, to an unacceptable degree. The assessment shows that any transgressions or reductions in amenity are within reasonable amounts and can be expected given the urban context of the masterplan area and local environment. This assessment has been carried out in accordance with the guidelines given in the London Borough of Ealing's adopted Development Management document and, more specifically, with the guidelines set out in the BRE Report.

#### Privacy

The proposed layout and massing of the site has been carefully considered to ensure no undue impacts such as overbearing and loss of privacy to neighbouring properties.

The proposals have been designed to conform with the consented parameters, most notably the Development Plots (ref: 16250-00-07-004) and the Illustrative Masterplan (ref: 16250-00-07-008) parameter plans.

A minimum separation distance of 19.5m would be provided between the southern elevations of Plots 9.5 & 9.6 and the nearest neighbouring Phases to the south, which are located across Osborne Road. The minimum separation distance between the northern elevations of these plots and the houses within the Mill Hill Conservation Area is 32m at the closest point (north-eastern corner of Plot 9.5) but increases to 53m further east. The relationship between buildings across the northern, western, eastern and southern sides of these Plots is considered to be acceptable and would not result in the loss of privacy to occupiers of the individual blocks.





The proposals will therefore retain the separation distances and relationships with neighbouring existing, emerging and proposed buildings which was consented under the 2018 Hybrid Masterplan.

The careful positioning of balconies also ensures that no additional overlooking or loss of privacy is generated above that which was consented under the 2018 Hybrid Masterplan.

### **Transport, parking and servicing**

Condition 5 of the 2018 Masterplan Permission proposes an overall maximum parking ratio of 0.3 spaces per residential dwelling. This parking ratio includes parking in off-street parking areas and the parking located within the public highway. Overall, the 2018 Masterplan Permission would provide approximately 600 car spaces across the remaining Regeneration site area. The eligibility to apply for parking permits to use the on-street parking (which will eventually be covered by the South Acton Estate Controlled Parking Zone) is restricted, via the s106 Agreement, to existing residents of the Estate who would be moving into the various phases of new development. As such, new residents to the Estate (in predominantly private sale and shared ownership dwellings) would not be eligible to apply for parking permits and would only have access to parking that is located off the adopted highway or that is sold together with the dwelling.

Condition 36 of the 2018 Masterplan Permission requires that prior to the commencement of each relevant Phase or Sub-Phase, the Highways layout access roads, ramps and footpaths shall be submitted to and approved in writing by the Local Planning Authority. Condition 48 of the 2018 Masterplan Permission requires approval of the detailed layout of car parking spaces, including details of disabled parking and 20% active electric vehicle charging points. Condition 62 requires LPA approval of the individual travel plan prior to first occupation and



Condition 63 seeks to ensure that a parking management plan is submitted prior to occupation of each relevant phase.

Section 9 in the NPPF sets out the importance of developments encouraging and facilitating an increase in the use of and access to sustainable transport methods.

Chapter 10 of the London Plan deals with transport with Policy T1 setting the overarching approach to transport strategy for the city. Policy T1 states that development Plans and development proposals should support the delivery of the mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle, or public transport by 2041, and the proposed transport schemes set out in Table 10.1.

Policy T1 continues, *"All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated."*

The London Plan additionally includes a new concept; 'Healthy Streets'. These are defined by 10 indicators as follows:

- Pedestrians from all walks of life;
- Easy to cross;
- Shade and shelter;
- Places to stop and rest;
- Not too noisy;
- People choose to walk, cycle, and use public transport;
- People feel safe;
- Things to see and do;
- People feel relaxed; and
- Clean air.

Policy T2 states that development proposals should demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance; reduce the dominance of vehicles on London's streets whether stationary or moving; and be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport

The site currently consists of C3 residential units which will be demolished in order to make way for new C3 dwellings of mixed sizes. These dwellings will be in the form of both houses and flats, with accessible flats located at a ground floor level. The development will be accompanied by associated landscaping and car parking.

#### Road Layout

Currently Enfield Road, Hanbury Road and Osbourne Road all serve as Secondary Roads within the Masterplan. These streets will retain the existing segregated footways on both sides of the road.

The proposed development also includes the initiation of one secondary route and two tertiary routes, in line with the layouts shown on approved parameter plan 005.

The proposed secondary route, Hanbury Road, links Enfield Road and Osbourne Road between Plots 9.2 and 9.5, whilst the tertiary routes provide access to and from the reconfigured allotments to the north of the plots. The Hanbury Road secondary route is already present on-site and was delivered as part of the Plots 9.2 works. The tertiary route separating Plots 9.5 and 9.6 has been given the name 'Willet Way' and is expected to form a landscaped space at the heart of the development

Whilst these links are secondary and tertiary in nature, these would provide they would provide important links for pedestrians and cyclists travelling through the estate and have therefore been carefully designed to ensure safe and convenient access is achieved by all modes.

A new tertiary access road will be provided between phase 9.5 and 9.6 which will allow refuse vehicles to service the residential units of these two phases off-street. The tertiary road will also provide access to a courtyard within phase 9.5 and 6 accessible car parking spaces.



Access and Circulation Strategy

Osbourne Road Spur (between 9.6 and Berrymede Junior School) is currently 5.5m in width with a 2m footway on the western side of the road. The road does not have a useable 'turning head' – what is present does not allow for the turning of anything larger than a car. The spur is approximately 65m in length, enough to accommodate 11 cars, with a further two in the 'turning head.' The road is frequently fully parked on the eastern side of the road, resulting in an effective width of approximately 3.5m.

The proposals for this Spur Road are to create a shared space which is approximately 6m in width with landscaping along the eastern side of the road adjacent to the junior school, with parking spaces accessed directly off the road.

#### Healthy Streets Assessment

The results of the Healthy Streets Assessment confirms that both Enfield Road and Osbourne Road will be significantly enhanced by the proposed improvement works.

The most noticeable change to the highway network would be parking, which currently runs parallel with the on-street parking, whereas the proposals would mean that parking will be inset within the footway, therefore improving the environment for both vehicles and cyclists.

There will also be improvements to pedestrian connectivity and to the general quality of the footways.

#### Car Parking

Plots 9.3, 9.5 and 9.6 proposals include a total of 51 car parking spaces across the site, representing a ratio of 0.23 spaces per unit, which is compliant with the 0.3 maximum car parking ratio for the Masterplan as a whole.

The proposals include 18 on plot parking spaces for residents and 29 on-street spaces for public use/visitors. The proposed on-street spaces would be incorporated within the existing CPZ, with only existing residents to be re-located into the new affordable rent block (if they already have permits) eligible to use them.

As set out in the legal agreement for the Masterplan future residents of the development are unable to apply for and obtain local on-street parking permits, unless they are already residents of the local area.

The proposed on-street parking would be provided in accordance with design standards, with spaces parallel to the carriageway edge provided with dimensions of 2.0 x 6.0 metres. All standard perpendicular car parking spaces would be 2.4 x 4.8 metres.

In accordance with LBE and London Plan parking policies, a maximum of 10% of all car parking spaces need to be wheelchair accessible, with increased dimensions. A minimum of 3% must be provided from the outset, with the infrastructure in place to increase this provision to 10% over time, when demand dictates. The Masterplan layout confirms that six of the 51 spaces would be wheelchair accessible. All of these parking spaces are to be located in between plots 9.5 and 9.6.

**Electric Vehicle Charging Points (EVCP)**

The London Plan requires 20% of all spaces to be provided with 'active' EVCPs and all of the remaining 80% of spaces would be connected to a 'passive' provision, to be activated if/when future demand dictates.

The scheme proposes providing EVCPs in line with London Plan requirements.

**Trip Generation**

The TA estimates that the site is likely to generate an additional 10 two-way vehicle movements in the AM peak and 12 in the PM peak. These traffic volumes would have a minimal impact on the surrounding highway network.

The assessment carried out in this section of the report is considered to be robust due to the proximity of the site to sustainable modes of transport and therefore the estimated use of sustainable modes of transport is to be considered appropriate.

**Cycle Parking**

London Plan Policy T5 requires development to deliver cycle parking in accordance with the minimum standards set out in Table 10.2; Table 10.2 sets out the following minimum cycle parking standards for residential development:

Long-Stay	Short-Stay
1 space per studio or 1 person 1 bedroom dwelling 1.5 spaces per 2 person 1 bedroom dwelling 2 spaces per all other dwellings	5 to 40 dwellings: 2 spaces Thereafter: 1 space per 40 dwellings

Accordingly, the proposal requires 392 long-stay spaces. The proposal would provide these spaces in multiple dedicated cycle stores internally, within the buildings proposed on Plots 9.5 and 9.6, and with bike storage integrated into the front garden for Plot 9.3 houses and ground-floor flats.

In addition, the development also proposes 8 on-street Sheffield stands for visitors, to be provided on-street, on Osborne Road and Hanbury Road.

The proposed cycle parking therefore meets the necessary requirements and accords with London Plan Policy T5.

**Servicing, Refuse and recycling**

Bin capacity for the new dwellings has been based on weekly collections using 1 x 1100ltr bin (waste) and 1 x 1100ltr bin (recycling) for every 8 dwellings and 1 x 240ltr bin (food waste) for every 20 dwellings. Waste provision is in accordance with the Ealing Waste Management Guidelines April 2018 document, which in relation to Plots 9.5 and 9.6 is as follows:

- Block A - 9 x 1100l Eurobins
- Block B - 14 x 1100l Eurobins
- Block C - 11 x 1100l Eurobins
- Block D - 9 x 1100l Eurobins

The bin stores are all located at ground floor level with paved footpaths and dropped kerbs designed to provide step-free collection from the highway or internal road. The bin stores for all residential properties are provided integral to the apartment buildings, with the exception of the maisonettes, which will have their own individual stores adjacent to their own private front doors.

Delivery and Servicing will primarily take place in line with the existing strategy that LBE adopts within the locality of the site. Plot 9.3, which consists of housing only, will be served on-street with each of the units having a refuse store located outside of their front doors, whereby on bin collection days these are easily transferred to the kerbside. Plots 9.5 and 9.6 will be serviced via a mixture of on-street and off-street. The houses on the western boundary of the site will again be served on-street. The flats within Plots 9.5 and 9.6 which face each other will be served off-street via an internal road which is accessed via Osbourne Road.

The drag distances for refuse collection for the operatives will be provided within the guidelines, a drag distance of 25m will be in place for the houses (household refuse bins) and 12m for the flats (communal bins).

Tracking has also been provided within the Transport Statement to demonstrate that the proposed arrangements are suitable.

**Energy and sustainability**

Conditions 29 (Sustainable Design and Construction Standards), 37 (Carbon Savings) and 51 (Overheating and Cooling for the residential units) of the 2018 Masterplan Permission require the submission of a full sustainability statement with evidence verifying the carbon savings being made on that Phase or Sub-Phase, and the details of the dynamic thermal modelling demonstrating how the development performs against the overheating criteria prior to the commencement of each phase.

Details of the energy and sustainability measures utilised across this phase are included in the Sustainability Statement and Energy Statement that were submitted alongside this application pursuant to Conditions 29, 37, and 51 of the 2018 Hybrid Outline Permission.

In summary and as set out in these reports, a low carbon approach to the design of the building's fabric and associated systems has been used to minimise energy use. The proposals will be connected directly to the Air Source based heat network and central plant serving the Acton Gardens development.

The community heating installation will be designed in accordance with the recommendations within the CIBSE Code of Practice for heat networks. The district heating network is proposed to be served by gas boilers and air source heat pumps generating close to 70% of the annual heat demand.

A 61kWp Photovoltaic panel installation will also be mounted on the roofs of Plots 9.5 and 9.6 blocks. The proposals include the incorporation of sustainable design and construction methods, energy and water saving measures, waste reduction techniques as well as measures to enhance the ecological value of the site.

This suite of sustainability conditions is therefore recommended for consequential approval.

### **Other planning considerations**

#### Flood Risk

Condition 12 (Flood Risk Assessment) of the 2018 Masterplan Permission requires that, prior to or concurrent with the submission of the first Reserved Matters Application for any Phase or Sub-Phase, the submission of a full Flood Risk Assessment relating to the surface water drainage of the relevant Phase or-Sub-Phase. Policy 1.2(m) of Ealing's Development Strategy relates to flood risk and development and states '*To reduce overall level of flood risk in the borough, through the layout and form of new development, and the appropriate application of sustainable drainage techniques...*'

Condition 34 (SUDs) and Policy 5.13 of the London Plan requires development utilise sustainable urban drainage systems (SUDS) in order to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. The latest guidance on the use of SUDS is provided in 'The SUDS Manual' by CIRIA (ref: C697 dated March 2007). This defines SUDS as '*Surface water drainage systems developed in line with the ideals of sustainable development...the philosophy of SUDS is to replicate, as closely as possible, the natural drainage from a site before development.*' As such, SUDS drainage can be in a variety of forms, including infiltration trenches, swales, permeable surfaces and green roofs.

The applicant submitted information to discharge condition 12, which requires the submission of a detailed surface water drainage scheme for each phase of the development. The information submitted pursuant to conditions 12 and 34 follows the submission of a Flood Risk Assessment and Drainage Strategy as part of the 2018 Masterplan Permission. The foul and surface water drainage strategy provide calculations of the existing and proposed peak run-off rates for the 1 in 100 year peak events, with a 40% allowance for increased rainfall intensity due to the effect of climate change.

Thames Water were consulted as part of the application and no objection has been received to the proposals. As such, the full discharge of conditions 12 and 34 are agreed in relation to Plots 9.3, 9.5 and 9.6.

#### Archaeology

Condition 31 of the 2018 Masterplan Permission states that no development shall commence on any Phase until the applicant has secured LPA approval for the implementation of a

programme of archaeological mitigation in accordance with a Written Scheme of Investigation for that phase / development zone.

The application is not accompanied by a written scheme of investigation, pursuant to condition 31 of the extant 2018 Masterplan Permission. Once these details are submitted for consideration under condition 31 GLAAS will be consulted and review the submission and advise whether the condition could be partially discharged in relation to these Plots, subject to a further stage of archaeological investigation if significant remains are found. As required by Condition 31, GLAAS would need to be consulted before any works commenced, including any post-excavation assessment / analysis leading to publication.

#### Mitigation of the Implications of the Development

In accordance with policy 8.2 of the London Plan and policies 6.1, 6.2, 6.3 and 6.4 of Ealing's Development Strategy, financial contributions have been secured under the conformed 2018 Masterplan s106 Agreement towards the provision of, *inter alia*, environmental, transport, education, sports facilities and highway improvements in the vicinity of the site. The financial triggers that would arise from the approval of the Plots 9.3, 9.5 and 9.6 approval as a result of the S106 commitments already entered into previously:

- Education: £93,750.00
- Provision of improvements for pedestrian, cyclist and road safety: £5,901.00
- Travel Plan: £3,750.00
- Public Open Space: 36,091.60
- Cat C Trees (5 no.): 3,750.00
- Child Playspace: £80,000.00
- Post-construction Renewable Energy Monitoring: £20,658.00
- Carbon Off set: £370,838.00

#### Community Infrastructure Levy

The Mayor's Community Infrastructure Levy (CIL) was adopted on 01/04/2019. This has introduced a charging system within Ealing of £60 per sqm of gross internal area (GIA) of net additional floorspace created. However, the current application is a conditions application pursuant to the 2018 Masterplan Permission (with planning permission ref: 182579OUT dated 24/12/2018), which is regulated by the previous Mayor's CIL (adopted on 01/04/2012) with a revised charging system within Ealing of £35 per sqm of gross internal area. Moreover, The CIL Regulations 2010 (as amended) state that affordable housing would be exempt from the charge but this is subject to the criteria set out in Regulation 51 of the regulations.

The total liable sum for the scheme is calculated as £424,795.00 based on 12,137sqm of chargeable development (inclusive of 19,900sqm of C3 floorspace minus 7,763sqm of demolished floorspace), but still needs taking into account the BCIS All In TPI index figure as relevant at the time of the permission. A discount for social housing relief may be applicable if the applicant can demonstrate that the development meets the criteria set out in Regulation 51 of the CIL Regulations 2010 (as amended). The liable sum for each phase of development shall be calculated at the commencement of the relevant phase and in line with the amount of floorspace and affordable housing proposed for that phase.

It is worth drawing attention to the fact that these figures may be amended in accordance with the actual publication TPI index figures at the date of issuing the decision notice.

## **ENVIRONMENTAL IMPACT ASSESSMENT**



The EIA procedure in the UK is directed by the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (the 'Regulations'), EU Directive 85/337/EEC (as amended), as well as the National Planning Practice Guidance (2014).

The 2018 Masterplan Permission and the original 2013 Outline Permission were subject to Environmental Impact Assessment. The Environmental Statement (the 'ES') for the South Acton Estate Regeneration scheme is comprised of the approved Environmental Impact Assessment which accompanied the 2018 Masterplan Permission and any subsequent ES Addendums, Further Information Reports (FIRs) and Supplementary Environmental Statements which have accompanied Reserved Matters Applications (REMs), Re-phasing Applications and Non-Material Amendments (NMAs) may be submitted against the 2018 Masterplan Permission.

Regulation 9 of the EIA Regulations requires local planning authorities to consider whether or not the environmental information already before them (i.e. the ES submitted with the 2018 Masterplan application ref: 182579OUT dated 24/12/2018 and any additional environmental information) is adequate to assess the environmental effects of the development.

An EIA Statement of Compliance reference 27157/A5/EIA dated 8th September 2021, accompanied the Plots 9.3, 9.5 and 9.6 REM application demonstrating how specific parameters and conditions associated with the 2018 Masterplan Permission have been addressed as part of these Plots proposals, to ensure the development is in accordance with the ES.

Therefore, the proposals for Plots 9.3, 9.5 and 9.6 are considered to conform with the scheme assessed as part of the ES forming part of the 2018 Masterplan Permission, as well as subsequent updates to the ES. As such, the proposals are considered environmentally compliant with the aspirations of the Acton Gardens Masterplan development.

### **Reconciliation Mechanism**

As aforementioned, the second part of Condition 8 requires that with each Reserved Matters Application, the REM submission is accompanied with the following details:

- a) Land Uses - a statement setting out the amount of development delivered to date within each land use and that remaining in relation to the areas set out in Condition 2 (maximum floorspace per approved land use);
- b) Site Layout - Updated illustrative masterplan to demonstrate that the proposals do not prejudice the delivery of adjacent phases within the context of the approved Parameter Plans and Design Guidelines.
- c) Car Parking - a statement setting out the total amount of all types of vehicle parking spaces delivered to date within each phase and within the context of the proposed parking ratios in the approved Transport Assessment;
- d) Affordable Housing - a statement setting out the amount and type of affordable housing delivered to date within each phase and that remaining to meet the requirements of the S106 Agreement.
- e) An Illustrative Reconciliation Masterplan showing how the scale of the Reserved Matters Application accords with relevant principles and parameters described in the Design Guidelines Document and how the proposed layout of the Primary, Secondary and Tertiary Connections (as defined on Parameter Plan 005), and the detailed layout of Public Open Spaces and other Enhanced Public Real within the Phase or Sub-

Phase, are consistent with the parameters and principles for the layout of the wider Character Area.

With respect to the Reconciliation Mechanism, the approved parameters and condition also requires the reserved matters details to be contrasted with the following specifications:

- a total Gross External Area (GEA) of residential and non-residential floorspace delivered to date (i) per phase (ii) within each respective Character Area and (iii) across the Remaining Masterplan Area in its entirety - with due regard to the parameters of the maximum consented quanta (195,396sqm of residential; 1,200 sqm of D1; 1,000sqm of A1-3/B1/D1-2).
- The total communal open space provision delivered across the Remaining Masterplan Area. This is within the context of Clandon Gardens comprising 2,750sqm open space; Avenue Park comprising 7,600sqm open space; Central Plaza comprising 8,100sqm open space; and the Jerome Allotments comprising 3,803sqm open space.
- The total residential car parking provided to date (i) per phase and (ii) across the Remaining Masterplan Area in its entirety. These are set out within the context of the maximum 0.3 car parking spaces per unit as consented.
- The number of private, shared ownership and affordable rent units delivered to date by habitable room (i) per phase and (ii) across the Remaining Masterplan Area in its entirety. These are to be set out within the context of, across the Remaining Masterplan Area, the S106 requirement to provide a minimum total of 2,453 habitable rooms in affordable rent; 558 habitable rooms in shared ownership; and 31% of affordable rent units as 3+ beds. For completeness, this schedule also provides the total affordable split phase by phase and cumulatively.

The summary table presented in Annex 1 contrasts the requirements of the Reconciliation Mechanism with the details of the proposed scheme for Plots 9.3, 9.5 and 9.6 and demonstrates that the proposed scheme is in compliance with the 2018 Masterplan Permission regulatory specifications and parameters.

The application is also accompanied with a Red Line Assemblment Plan Illustrating the configuration and dovetailing / tessellation of all reserved Matters Application extents consented to date, to provide comfort of the area of the Hybrid Outline Application that has detailed consent for build-out. These are considered acceptable in the context of the requirements set out in Condition 8 of the 2018 Masterplan Permission.

## **CONCLUSION**

The recommendation to approve the reserved matters application for Plots 9.3, 9.5 and 9.6 has been taken having assessed the application against the relevant policies contained in the Development Plan, comprising the London Plan 2016, Ealing's Development Strategy 2012 and Ealing's Development Management DPD 2013, as well as the material planning considerations including the NPPF and the extant 2018 Masterplan Permission ref: 182579OUT dated 24/12/2018.

The proposal seeks approval for the remaining development plot within the Enfield Road Character Area of the South Acton Estate Regeneration Development and the submission proposes a residential use development on Plots 9.3, 9.5 and 9.6 to provide 215 new homes.

Together with previous phases and new public open spaces and roads already approved, the development of these plots represent the completion of the character area providing the conclusion of a substantive stage to the scheme.

The Reserved Matters have been considered against the parameters and controls captured within the 2018 Masterplan Permission. Details relating to Landscape, Access, Appearance, Layout, Scale, including land use have been demonstrated to comply with the parameters within the 2018 Masterplan Permission and the allowable limits of deviation.

The supporting technical details accompanying this application demonstrate satisfactory compliance with the relevant standards and Policies including daylight and sunlight, drainage, residential space standards and amenity, accessibility and sustainability. Where minor deviations have been identified these have been demonstrated to be acceptable and not to have significant impacts upon the conclusions reached in the Environmental Statement accompanying the S73 Permission.

The plot will provide a car parking ratio of 0.23 spaces per unit in accordance with the approach taken for similar Plots within this character area. The level of car parking accords with parking standards established by the 2018 Masterplan Permission and wider policy requirements for a site of PTAL 4-5 at the time of occupation.

The design of the buildings and environment proposed would provide a high-quality residential environment and new urban realm responding to adjacent approved buildings and the location of approved open spaces and a new road.

Overall, officers find the proposals acceptable and accordingly **APPROVAL** is recommended subject to conditions as set out in this report.

**ANNEX 1**

**CONDITIONS:**

1. Approved Plans and Documents

The development hereby approved shall be carried out in accordance with the following approved plans and documents:

Drawings

Architectural: ACT-PTE-P1-00-DR-A-10110 Rev. P1; ACT-PTE-P1-XX-DR-A-10111 Rev. P1; ACT-PTE-ZZ-00-DR-A-10100 Rev. P1; ACT-PTE-ZZ-01-DR-A-10101 Rev. P1; ACT-PTE-ZZ-02-DR-A-10102 Rev. P1; ACT-PTE-ZZ-03-DR-A-10103 Rev. P1; ACT-PTE-ZZ-04-DR-A-10104 Rev. P1; ACT-PTE-ZZ-05-DR-A-10105 Rev. P1; ACT-PTE-ZZ-06-DR-A-10106 Rev. P1; ACT-PTE-ZZ-07-DR-A-10107 Rev. P1; ACT-PTE-ZZ-XX-DR-A-10000 Rev. P1; ACT-PTE-ZZ-XX-DR-A-10002 Rev. P1; ACT-PTE-ZZ-XX-DR-A-10004 Rev. P1; ACT-PTE-ZZ-XX-DR-A-10005 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10200 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10201 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10202 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10300 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10301 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10302 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10303 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10304 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10305 Rev. P1; ACT-PTE-ZZ-ZZ-DR-A-10306 Rev. P1

Landscape: 11474-LD-PLN-100 Rev. P3; 11474-LD-PLN-110 Rev. P3; 11474-LD-PLN-111 Rev. P3; 11474-LD-PLN-150 Rev. P2; 11474-LD-PLN-151 Rev. P2; 11474-LD-SEC-600 Rev. P1; 11474-LD-SEC-601 Rev. P1; 11474-LD-SEC-650 Rev. P1

Documents:

Cover Letter (Barton Willmore); Design and Access Statement (Dated 17 September 2021); Planning Statement (Ref: 27157/A3/AK, Rev. 2, Dated 22 September 2021); Transport Statement (Ref. 21043-TS01, Rev. B, Dated 24 September 2021); Statement of Community Involvement (Dated July 2021); Affordable Housing Statement (Dated September 2021); Block Management Plan (Dated September 2021); Reconciliation Statement (Ref. 27157/A3/RM Application, Rev. 1, Dated 1 September 2021); Planning Fire Statement (Ref. FL7579/ks/18cppl, Dated 1 September 2021); Gateway 1 Fire Statement Form (Dated 1 September 2021); Outline Fire Strategy Report (Ref. FL7579/R1, Rev. 2, Dated 1 September 2021); Daylight, Sunlight and Overshadowing Report (Ref. 63283/01/BK/TRL, Dated September 2021); Conservation Statement (Ref. 180634, Rev. 2, Dated 7 September 2021); Arboricultural Impact Assessment (Ref. 1609.1, Dated 8 September 2021); EIA Statement of Compliance (Ref. 27157/A5/EIA, Dated 8 September 2021); and Updated Phasing (Ref. 27157/A3, Rev. 00, Dated September 2021).

Reason: For the avoidance of doubt and in the interests of proper planning.

2. Materials

Notwithstanding the submitted details, construction of the development hereby permitted shall not proceed above ground floor damp proof course level unless and until details of materials (including samples) to be used for the external surfaces of the building and hard surfaced areas within the plot shall be submitted to and agreed in writing by the Local Planning Authority including, though not limited to:

- Sample glazing with window/door frame(s);
- Balustrade and edge detail;
- Roofing materials, including roof parapets and overhangs to flats;
- Typical rainwater goods (section of gutter, downpipe etc);

- Sample areas of brickwork and mortar;
- Areas of parking and paving; and
- Hard Landscaping areas.

The development shall thereafter be implemented in accordance with the approved details.

Reason: To safeguard the visual amenities of the building and surrounding area

### 3. Doors to Open Inwards

All ground floor doors within the development, including refuse access stores and residential entrances shall open inwards.

Reason: In the interest of pedestrian and highway safety.

### 4. Courtyard/ amenity space/ Allotments boundary treatments

Prior to the commencement of any of the superstructures of the buildings approved, details of boundaries treatment and screening to the perimeters of the allotments areas and amenity areas shall have been submitted to and approved by the local planning authority.

Reason: To safeguard the security and visual and residential amenities of neighbouring residents and of the area in accordance with policy D3 of the London Plan 2021.

### 5. Old Estate Wall

Prior to the commencement of development on each Phase or Sub-Phase, including demolition and construction, a wall protection scheme (for the southern boundary wall between Acton Gardens and the Mill Hill Conservation Area) shall be submitted to and approved in writing by the Local Planning Authority.

No operations (including initial site clearance) shall commence on site in connection with development hereby approved until a suitable scheme for the protection this wall has been submitted and its installation on site has been approved in writing by the Local Planning Authority.

All protection measures must fully detail each phase of the development process taking into account demolition/site clearance works, all construction works and hard and soft landscaping works.

Any damage resulting from construction activity in connection with the plots should be repaired in a historically appropriate manner

Reason: To ensure appropriate protection of the heritage asset.

### 6. Allotment Details

Prior to the commencement of development on each Phase or Sub-Phase, including demolition and construction, a detailed allotment scheme, shall be submitted to and approved in writing by the Local Planning Authority. The detailed allotment scheme must include the following:

- Details of community gardening areas,
- Timescales for transfer of plot holders to new plots,



- Details of soil strategy,
- Details of delivery mechanisms and handovers,
- Ecology,
- Footpaths including footpaths widths and ramps,
- Details of communal green infrastructure,
- Proposed new planting,
- Details of new composting toilets,
- Details of watering points,
- Details of raised beds and community storage,
- Details of micro plots sizes,
- Site clearance green waste arisings and clearances,
- Details of Enfield Road vehicle entrance, and
- Details of Orchards, ponds, tree planting and hedgerows.

No operations (including initial site clearance) shall commence on site in connection with development hereby approved until a suitable scheme with these details has been submitted and approved in writing by the Local Planning Authority.

Reason: To ensure that the development is carried out in accordance with the approved plans and other submitted details and to ensure that the detailed allotment provision keeps within the Allotment Strategy assessed as part of Condition 21 '*Allotment Strategy*' of the 2018 Masterplan (application ref: 215670CND).

**INFORMATIVES:**

1. The decision to approve the reserved matters application for Plots 9.3, 9.5 and 9.6 of the South Acton Estate Masterplan (the "*2018 Masterplan Permission*") has been taken by the Council's Planning Committee after considering the application against the relevant National, Strategic and Local Planning policies and other material planning considerations. The following are considered relevant to this proposal:

National Planning Policy Framework 2018

2. Achieving sustainable development
5. Delivering a sufficient supply of homes
6. Building a strong, competitive economy
7. Ensuring the vitality of town centres
8. Promoting healthy and safe communities
9. Promoting sustainable transport
11. Making effective use of land
12. Achieving well-designed places
13. Protecting Green Belt land
14. Meeting the challenge of climate change, flooding and coastal change
15. Conserving and enhancing the natural environment
16. Conserving and enhancing the historic environment

London Plan (December) 2021

Planning London's Future (Good Growth Policies)

GG1 Building strong and inclusive communities

GG2 Making the best use of land

GG3 Creating a healthy city

GG4 Delivering the homes Londoners need

GG5 Growing a good economy

GG6 Increasing efficiency and resilience

Spatial Development Patterns

SD7 Town centre network

SD9 Town centres: Local partnerships and implementation

SD10 Strategic and local regeneration

Design

D1 London's form, character and capacity for growth

D2 Infrastructure requirements for sustainable densities

D3 Optimising site capacity through the design-led approach

D4 Delivering good design

D5 Inclusive design

D6 Housing quality and standards

D7 Accessible housing

D8 Public realm

D9 Tall buildings

D11 Safety, security and resilience to emergency

D12 Fire safety

D13 Agent of Change

D14 Noise

Housing

H1 Increasing housing supply

H3 Monitoring housing targets

H5 Delivering affordable housing

H7 Affordable housing tenure

H8 Monitoring of affordable housing

H10 Redevelopment of existing housing and estate regeneration

H11 Ensuring the best use of stock

H12 Housing size mix

H13 Build to Rent

H14 Supported and specialised accommodation

H15 Specialist older persons housing

Social Infrastructure

S1 Developing London's social infrastructure

S2 Health and social care facilities

S3 Education and childcare facilities

S4 Play and informal recreation

S5 Sports and recreation facilities

Economy

E2 Low-cost business space

E3 Affordable workspace

E4 Land for industry, logistics and services to support London's economic function

E11 Skills and opportunities for all

Heritage and Culture

HC1 Heritage conservation and growth

HC3 Strategic and Local Views

Green Infrastructure and Natural Environment

G1 Green infrastructure

G3 Metropolitan Open Land

G4 Local green and open space  
G5 Urban greening  
G6 Biodiversity and access to nature  
G7 Trees and woodlands  
G8 Food growing

Sustainable Infrastructure

SI1 Improving air quality  
SI2 Minimising greenhouse gas emissions  
SI3 Energy infrastructure  
SI4 Managing heat risk  
SI5 Water infrastructure  
SI6 Digital connectivity infrastructure  
SI7 Reducing waste and supporting the circular economy  
SI8 Waste capacity and net waste self-sufficiency  
SI10 Aggregates  
SI12 Flood risk management  
SI13 Sustainable drainage

Transport

T1 Strategic approach to transport  
T2 Healthy Streets  
T3 Transport capacity, connectivity and safeguarding  
T4 Assessing and mitigating transport impacts  
T5 Cycling  
T6 Car parking  
T6.1 Residential parking  
T6.5 Non-residential disabled persons parking  
T7 Deliveries, servicing and construction  
T8 Aviation  
T9 Funding transport infrastructure through planning

Funding the London Plan

DF1 Delivery of the Plan and Planning Obligations

Monitoring

M1 Monitoring

London Plan Supplementary Planning Guidance /Documents

Providing for Children and Young People's Play and Informal Recreation  
Good Practice Guidance for Estate Regeneration  
Character and Context SPG  
Use of planning obligations in the funding of Crossrail, and the Mayoral CIL  
Sustainable Design and Construction SPG  
London Environment Strategy  
Shaping Neighbourhoods: Character and Context  
The control of dust and emissions during construction and demolition  
Accessible London: Achieving an Inclusive Environment  
Social Infrastructure  
Housing SPG  
Affordable Housing and Viability SPG  
Transport Strategy

Ealing's Adopted Development (or Core) Strategy 2012

1.1 Spatial Vision for Ealing 2026 (a), (e), (f), (g), (h), (i), (j) and (k)

- 1.2 Delivery of the Vision for Ealing 2026 (a), (d), (f), (h) and (m)
- 3.8 Residential neighbourhoods
- 4.1 Enhance Residential Hinterlands
- 5.4(a) Protect the Natural Environment – Biodiversity and Geodiversity
- 5.5 Promoting Parks, Local Green Space and Addressing Deficiency
- 6.1 Physical infrastructure
- 6.2 Social Infrastructure
- 6.3 Green infrastructure
- 6.4 Planning Obligations and Legal Agreements

Ealing's Development Management Development Plan Document 2013

- 2.18 Ealing Local Variation - Green Infrastructure: The Nature of Open and Green Spaces
- 3.4 Ealing Local Variation - Optimising Housing Potential
- 3.5 Ealing Local Variation - Quality and Design of Housing Developments
- 3A Affordable Housing
- 4A Employment Uses
- 4B Retail
- 5.2 Ealing Local Variation - Minimising Carbon Dioxide Emissions
- 5.10 Ealing Local Variation - Urban Greening
- 5.11 Ealing Local Variation - Green Roofs and Development Site Environs
- 5.12 Ealing Local Variation – Flood Risk Management
- 5.21 Ealing Local Variation - Contaminated Land
- 6.13 Ealing Local Variation - Parking
- 7A Amenity
- 7.3 Ealing Local Variation - Designing Out Crime
- 7.4 Ealing Local Variation - Local Character
- 7.7 Ealing Local Variation - Location and Design of Tall and Large Buildings
- 7B Design Amenity
- 7C Heritage

7D Open Space

EA Presumption in Favour of Sustainable Development

Adopted Supplementary Planning Documents

Sustainable Transport for New Development SPD December 2013

Site Allocation OIS6 of Development Sites DPD December 2013

Interim / Draft Supplementary Planning Guidance

SPG 3: Air Quality

SPG 4 Refuse and recycling facilities

SPG 9 Trees and development guidelines

SPG 10 Noise and Vibration

SPD 9 Legal Agreements, Planning Obligations and Planning Gain

- Ealing Tree Strategy 2013 to 2018 (August 2013)

Other Material Considerations

BRE Site layout planning for daylight and sunlight (2011)

Greater London Authority Best Practice Guidance 'The Control of Dust and Emissions from Construction and Demolition (2006)

BS 5228-1:2009 - Code of practice for noise & vibration control on construction & open sites- Part 1: Noise

DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Environment Agency guidance 'Verification of Remediation of Land Contamination', Report:

SC030114/R1'.

London Plan Housing - Supplementary Planning Guidance

In reaching the decision to grant permission, specific consideration was given to the information contained in the applicant's Environmental Statement and other technical reports submitted with the application. Consideration was given to the impact of the proposed development on the amenities of neighbouring properties and on the character and appearance of the wider area. Consideration was also given to placemaking, the quality of the residential development, the level of provision of affordable housing and the impact of the proposed commercial aspects in relation to both the proposed and existing neighbourhoods and nearby local centres. Consideration was also given to the impact of the development on the local transport network and the satisfactory provision of car parking and cycle parking facilities alongside the acceptability of the proposed sustainability credentials of the development. Local Development plan policies support the proposed development. Other material matters that were assessed included matters of mitigation including trees and carbon off-setting that resulted in financial contributions; the consideration of objections/comments received from interested parties to date. The proposed development is considered to be acceptable on these grounds and it is not considered that there are any other material considerations in this case that could sustain or justify the refusal of the application.

2. In accordance with Regulations 3 and 9 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, it is considered that this Reserved Matters submission reveals, with regard to the subject matter of the application, that there are no additional or different likely significant environmental effects than is considered in the environmental information already before the Council including the Environmental Statement (submitted with planning permission ref: 182579OUT dated 24/12/2018) and any further and/or other information previously submitted. The environmental information already before the Council therefore remains adequate to assess the environmental effects of the development and has been taken into consideration in this decision.

3. This development is covered by an extant Agreement under Section 106 of the Town and Country Planning Act (as amended) associated with planning permission ref: 182579OUT dated 24/12/2018).

4. The revised Mayor's Community Infrastructure Levy (CIL) was adopted on 01/04/2019. This has introduced a revised charging system within Ealing of £60 per sqm of gross internal area to be paid to the GLA. However, the current application is a conditions application pursuant to the 2018 Masterplan Permission (with planning permission ref: 182579OUT dated 24/12/2018), which is regulated by the previous Mayor's CIL (adopted on 01/04/2012) with a revised charging system within Ealing of £35 per sqm of gross internal area. On the basis of the information submitted with the application, the proposed development would be liable to pay CIL due to the development comprising of new residential units and development of over 100sq.m (not exempt from the Mayors CIL).

5. Construction and demolition works, audible beyond the boundary of the site shall only be carried on between the hours of 0800 - 1800hrs Mondays to Fridays and 0800 - 1300hrs on Saturdays and at no other times, including Sundays and Bank Holidays. No bonfires shall be lit on site. Prior to commencement of building works, details of mitigation measures to control the release of asbestos fibres shall be submitted to this section for approval.

6. Prior to the commencement of any site works and as works progress, all sensitive properties surrounding the development shall be notified in writing of the nature and duration of works to be undertaken, and the name and address of a responsible person, to whom an enquiry/complaint should be directed.

7. The applicant is reminded that they are required to enter into a S.278 / S.38 Agreement with the Local Highways Authority with respect to the proposed works to the adopted highway, including alterations to the existing footways on Bollo Bridge Road, Osborne Road and Stafford Road and other works to the adopted highway that are necessary to facilitate the delivery of the approved development. In this regard, the Local Highways Authority has expressed a strong preference for the parking area to the north of the proposed nursery (at the eastern end of Osborne Road) to form part of the adopted highway. The applicant would be liable to pay the fees associated with entering into the Agreement.

8. Within the allotment area any buildings, such as sheds or growing structures should be sufficiently far from any boundary walls or fences, to avoid security issues

9. The applicant’s attention is drawn to the fact that Heathrow advises that if a crane is required for construction purposes, then red static omnidirectional lights would need to be applied at the highest part of the crane and at the end of the jib if a tower crane, as per the requirements set out by CAP1096.

10. The reserved matters application includes details pursuant to a number of conditions of the extant 2018 Masterplan Permission. These details were considered as part of the reserved matters determination for Plots 9.3, 9.5 and 9.6 and therefore consequential approval – only insofar as it directly relates to these plots – is Granted for the following conditions:

	Condition	Reference	Description	Status
<b>Submission concurrent to Plots 9.3, 9.5 and 9.6 Reserved Matters Application</b>	9	215821CND	Details of Sunlight and Daylight Report	Approve
	10	216033CND	Details of Microclimate Assessment	Approve
	11	216220CND	Details of Wind Assessment	Approve
	12	216034CND	Details of Flood Risk Assessment	Approve
	13	216035CND	Details of Swept Paths	Approve
	14	216263CND	Walking and Cycling Study	
	15	216264CND	Cycle Parking part pursuant to condition 15	
	16	216034CND	Details of Fire Statement	Approve
	17	216037CND	Details of Open Space Surveys	Approve
	18	216262CND	Open Space Design	
23	216038CND	Active Design Statement		

**ANNEX 2**

**Reconciliation Mechanism**



Matter	Total Requirement	Consented (9.2, 9.4, 8.1, 8.2 & 7.2)	Phases 9.3, 9.5 & 9.6	Total Quantum Provided	Quantum Remaining
<b>Residential</b>	<i>Clandon Gardens CA</i>	56,889sqm (GEA)	0sqm	21,682sqm	35,207sqm
	<i>Avenue Park CA</i>	82,284sqm (GEA)	0sqm	36,037sqm	46,247sqm
	<i>Enfield Road CA</i>	56,223sqm (GEA)	42,294sqm	64,474sqm	-8,251sqm
	<b>TOTAL</b>	1,950 units / 195,396sqm (GEA)	933 units / 100,013sqm	215 units/ 22,180sqm	1,148 units/ 122,193sqm
<b>Non-Resi</b>	1,000sqm A1-3/B1/D1-2 1,200sqm D1	123sqm A1-3/B1/D1-2	0sqm	123sqm A1-3/B1/D1-2	877sqm A1-3/B1/D1-2 1,200sqm D1
<b>Car Parking</b>	<i>Resi Spaces</i>	Provision subject to Phase	47	274	No target
	<i>Ratio</i>	0.3	0.21	0.23 overall	Max 0.3 overall
<b>Tenure</b>	<i>Social Rent</i>	2,453 hab rooms	264 hab rooms (of which 88hr for 55+)	1,309 hab rooms (of which 88hr for 55+)	1,144 hab rooms
	<i>Intermediate</i>	558 hab room	67 hab rooms (24 units)	361 hab rooms	197 hab rooms
	<i>Private</i>	No target	332 hab rooms (116 units)	1,813 hab rooms	No target
	<b>TOTAL AH</b>	Total 49%	1,339 hab rooms -47.4%	331 hab rooms - 49.9%	1,670 hab rooms - 47.9%
<b>Affordable Rent of 3+ bed</b>	Total 31% (by unit)	125 of 300 units - 41.6%	28 of 40 units - 70%	153 of 340 units - 45%	N/A
<b>Open Space</b>	<i>Clandon Gardens</i>	2,750sqm	0sqm	0sqm	2,750sqm
	<i>Avenue Park</i>	7,600sqm	0sqm	0sqm	7,600sqm
	<i>Central Plaza</i>	8100sqm	0sqm	0sqm	8100sqm
	<i>Jerome Allotments</i>	3,803sqm	0sqm	4,300sqm	0sqm