Ref :	**195284FUL**
Address:	**LAND OPPOSITE RAVENSWOOD COURT, STANLEY ROAD, ACTON**
Ward:	**SOUTH ACTON**
Proposal:	**Demolition of existing building and structures, and construction of a ground plus part 9 and part 16 storey mixed-use development comprising industrial space (Use Class E(g)(iii)) on ground, first and second floor levels; with 140 residential units; rooftop amenity space, rooftop plant, landscaping, access, car and cycle parking, plant rooms and all associated ancillary and enabling works**
Drawing Numbers:	**GRE-HTA-A-0001 Rev P2, GRE-HTA-A-0050 Rev P2, GRE-HTA-A-0150 Rev P2, GRE-HTA-A-0151 Rev P2, GRE-HTA-A-0152 Rev P2, GRE-HTA-A-0153 Rev P2, GRE-HTA-A-0154 Rev P2, GRE-HTA-A-0210 Rev P2, GRE-HTA-A-0211 Rev P2, GRE-HTA-A-0212 Rev P2, GRE-HTA-A-0213 Rev P2, GRE-HTA-A-0260 Rev P2, GRE-HTA-A-0261 Rev P2, GRE-HTA-A-0262 Rev P2, GRE-HTA-A-0310 Rev P2, GRE-HTA-A-0311 Rev P2, GRE-HTA-A-0312 Rev P2, GRE-HTA-A-0313 Rev P2, GRE-HTA-A-0318 Rev P2, , GRE-HTA-A-0320 Rev P2, GRE-HTA-A-0326, GRE-HTA-A-0327, GRE-HTA-A-0328, GRE-HTA-A-0329, GRE-HTA-A-0330,GRE-HTA-A-0331, GRE-HTA-A-0332, GRE-HTA-A-0333, GRE-HTA-A-0334, GRE-HTA-A-0335, GRE-HTA-A-0336, GRE-HTA-A-0337**
Supporting Documents:	**Planning and Affordable Housing Statement, prepared by DP9 Ltd; Townscape & Visual Impact Appraisal, prepared by Arc; Historic Environment Assessment, prepared by MOLA; Arboricultural Impact Assessment, prepared by Landmark Trees; Air Quality Assessment, prepared by Air Quality Consultants; Preliminary Ecology Appraisal, prepared by the Ecology Consultancy; Geo-Environmental Desk Study, prepared by WSP; Energy Statement (including overheating), prepared by Twin Earth; Sustainability Strategy (including Ealing sustainability checklist), prepared by Twin Earth; Noise and Vibration Assessment, prepared by Sandy Brown; Statement of Community Involvement, prepared by Four Communication; Commercial Assessment Report, prepared by CFC Commercial; and Agent of Change Assessment, prepared by Trium (all documents submitted November 2021)** **Design and Access Statement Addendum, prepared by HTA; Statement of Community Involvement Addendum, prepared by Four Communications; Townscape and Visual Impact Appraisal, prepared by Arc; Heritage Statement, prepared by Gareth Jones Heritage Planning; Energy Statement Addendum, prepared by Twin & Earth; GLA Consultation – Energy Memo, prepared by Twin & Earth; Sustainability Statement Addendum, prepared by Twin & Earth; Whole Lifecycle Carbon Report (including Appendix B GLA spreadsheet), prepared by Twin & Earth; Circular Economy**

Statement, Prepared by Twin & Earth; Air Quality Assessment Addendum, prepared by Air Quality Consultants; Archaeological Desk-Based Assessment Report Addendum, prepared by Museum of London Archaeology; Drainage Strategy Statement of Conformity (including June 2020 Drainage Strategy), prepared by WSP; Geo-Environmental Desk Study Statement of Conformity, prepared by WSP; Arboricultural Impact Assessment Statement of Conformity, prepared by Landmark Trees; and Commercial Assessment Report Statement of Conformity, prepared by CF Commercial (all documents submitted October 2021)

Planning Application Form, prepared by DP9 Ltd (September 2023); Community Infrastructure Levy Additional Information Form, prepared by DP9 Ltd (September 2023); Planning Application Drawings, prepared by HTA (August 2023); Schedule of Accommodation, prepared by HTA (August 2023); Design and Access Statement Addendum, prepared by HTA (August 2023); Townscape and Visual Impact Appraisal Addendum Note, prepared by Neaves Urbanism (August 2023); Heritage Assessment Statement of Conformity, prepared by Gareth Jones Heritage Planning (August 2023); Flood Risk Assessment, prepared by RMA Environmental (August 2023); Transport Assessment, prepare by Caneparo (August 2023); Travel Plan, prepared by Caneparo (August 2023); Delivery and Servicing Plan, prepared by Caneparo (August 2023); Outline Construction Logistics Plan, prepared by Caneparo (August 2023); Energy Statement Addendum, prepared by Twin & Earth (August 2023); GLA's Carbon Emission Reporting spreadsheet, prepared by Twin & Earth (August 2023); Sustainability Statement Addendum, prepared by Twin & Earth (August 2023); Whole Lifecycle Carbon and Circular Economy Addendum, Prepared by Twin & Earth (August 2023); Air Quality Assessment Statement of Conformity, prepared by Air Quality Consultants (August 2023); Archaeological Desk-Based Assessment Report Addendum, prepared by Museum of London Archaeology (August 2023); Planning Fire Safety Statement, prepared by Hilson Moran (August 2023); Fire Statement Form, prepared by Hilson Moran (August 2023); Ventilation Statement, prepared by Hilson Moran (August 2023); Daylight and Sunlight Report – Impact on Neighbouring Properties, prepared by GIA (August 2023); Daylight and Sunlight Report – Internal, prepared by GIA (August 2023); Wind Microclimate Assessment Report, prepared by GIA (August 2023); Preliminary Ecological Appraisal (PEA) Statement of Conformity, prepared by Temple Group (August 2023); Noise and Vibration Assessment Statement of Conformity, prepared by Sandy Brown (August 2023); and; Agent of Change Assessment Statement of Conformity, prepared by Trium (August 2023).

Type of Application: **Major**

Application Received: **02/12/2019** **Revised:** **29/09/2023**

Report by: John Robertson

Recommendation:

That the committee GRANT planning permission subject to Stage II referral to the Mayor of London, and the satisfactory completion of a legal agreement under section 106 of the Town and Country Planning Act 1990 (as amended) and section 278 of the Highways Act 1980 in order to secure the items set out below:

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Executive Summary:

This application seeks permission to redevelop an industrial unit and area of surface car parking on a 0.14 ha site at the corner of an industrial estate to provide a ground plus part 9 and part 16 storey mixed-use development with industrial space (Use Class E(g)(iii)) on ground, first and second floor levels and 140 flats above.

Figure 1: Site Location

The site forms part of a Locally Significant Industrial Site. The proposed development would replace the existing 77 sq m of light industrial floorspace with modern industrial space at ground, upper ground and first floor levels resulting in a floorspace gain of 717 sq m (GIA). As such, the proposed development would result in intensification of the LSIS site and provide additional industrial capacity in accordance with London Policy E7 and Policy E6 of the Reg19 Draft Ealing Local Plan.

The development would exceed the 15 storeys height limit and 300 HR/ha residential density target set by the South Acton Industrial Masterplan for this area. However, this proposal would result in a number of public benefits which improve the function, quality or amenity of the masterplan area, as follows:

- a net gain of 717 sq m of modern industrial floorspace and 25-40 more local jobs;
- improved access and servicing arrangements with the adjoining site;
- public realm improvements and tree planting on Stanley Road outside the development;
- 42 affordable flats (35% by HR) of which 19 would be for social rent.

The proposal has attracted a very large number of objections from local residents and other local groups, over 570 for the original and revised schemes combined. These have raised a wide range of issues including overdevelopment of a small site, the building being too high, visually intrusive and out of character with area, adverse visual impacts on local views, daylight, overlooking and overbearing effects on nearby dwellings, adverse sunlight and wind impacts on the adjoining allotments, inadequate provision of amenity space, restricted emergency vehicle access affecting fire safety for a high building, increased strain on community facilities and already overcrowded local public transport, erosion of the industrial estate and local employment, and adverse wind tunnel effects.

The scale and design have evolved through pre- application and post application negotiations with the GLA, planning officers and the Ealing Design Review Panel. This has led to substantial revisions from the original scheme. These include reducing the taller building by 6 storeys and the shoulder building

by a single storey, reducing the number of flats from 210 to 140, changing the housing mix to provide fewer studios and more larger family sized units, changing the scheme from Build to Rent to conventional market sale/affordable units, providing every flat with its own balcony and access to communal roof terraces, increasing the proportion of dual aspect units to 50% with no single aspect north facing units, and setting back the building from the eastern and western site boundaries by a further 1.5m.

Figure 2: View from Stanley Road

The proposed part 10 and part 17 storey development is considered as a tall building and conflicts with Ealing and London Plan policies in that it is not on a site is not identified as appropriate for tall buildings, and not in a town centre or an opportunity area. However, it has been brought forward through a plan-led approach. The scheme has also been assessed against the design criteria of London Plan Policy D9. The proposal would accord with many of these criteria and some of the guidelines in the new Ealing Housing Design Guidance.

This scheme is being assessed against the recently ratified South Acton LSIS Masterplan that was initiated by Council. The proposal is therefore consistent with the principles set by both Policy E7 of the London Plan, as well as Policy E6 of the Reg 19 Draft Ealing Local Plan. The new Masterplan sets out locations suitable for co-location, determines appropriate heights, concentrates focus on the delivery of good quality industrial space, and outlines necessary public realm improvements that will be required to accommodate the emerging residential community within the area. It is considered that the proposal conforms to the principles of the Masterplan, as will be outlined within this report.

Consideration of the scale of this development also needs to take account of the emerging townscape in the surrounding area, including the context of the Acton Gardens masterplan and various tall, new buildings recently approved nearby. While the proposed building would not obviously meet the aims of the Acton Gardens Master Plan, it can be argued the proposed building would reflect a changing townscape picture in the wider area of South Acton where taller buildings are becoming more prevalent.

In terms of impact on views and townscape, the submitted visual impact appraisal considers that the proposed development would have no effect on some representative views and at worst a moderate and beneficial effect on others. It also notes that emerging schemes along Bollo Lane and nearby

would be visible from most of these views and will reduce the visual impact. It further argues that the development would provide a new feature not uncharacteristic of the townscape of South Acton, that its varied building form means that it would be perceived as two buildings, helping to break up its overall mass within views and that it would visually improve the townscape around South Acton station. It would also provide an active frontage to Stanley Road, improve the streetscene and provide natural surveillance onto the surrounding streets.

Based on the submitted Heritage Assessment, there would be no harmful effect on the setting of any heritage asset in the surrounding area.

It is not considered the proposal would result in unacceptable overlooking to adjoining residential or industrial properties given the separation distances involved. There will be some adverse impacts on the outlook and on sunlight to balconies of some existing flats in Ravenswood Court. On balance, based on the BRE guidance, the proposals are not considered to have impacts on the daylight or other amenity of nearby properties to a level that would justify refusal.

The proposed mix of unit sizes is considered acceptable in this location since 9% of flats would be 2 bedrooms / 4 person units and three bedroom / 5 person units suitable for family accommodation, and a further 38% would be 2 bedroom/ 3 person units.

Following significant revisions, the scheme would now provide 42 affordable flats, 35% of the total by habitable room. The tenure mix would now be 56% social rent and 44% intermediate. This is very close to the Council's preferred tenure mix of 60% social rent and 40% intermediate and considered acceptable by the Council's Housing officers. It can also be argued that a more flexible approach to tenure should apply here due to viability factors and the constraints of a small site.

Some 50% of the flats would now be dual aspect, including all of the 3 bedroom units, and none of the single aspect units would be solely north facing. This can be considered acceptable given the constraints of the site. Within the constraints of this urban location, all the flats are considered to have acceptable levels of daylight. Subject to further measures required by planning conditions, the proposed residential units would provide adequate environmental conditions and adequate living conditions in terms of floor space, layout and visual outlook.

All proposed flats would have private amenity space to meet London Plan standards in the form of balconies. In addition, 410 sq m of outdoor communal amenity space is provided on the 10th and 17th floors and the roof terraces would contain 254 sq m of playspace for children under 5. This level of amenity and children's playspace space provision would fall below Council standards within an area of district and local park deficiency, and S106 contributions have been agreed for improvements to local parks and children's play spaces.

There would be no loss of trees arising from the proposals. 15 new trees would be planted in the public realm area beside the site and 3 existing trees along Stanley Road would be temporarily removed and relocated within the site once the new building is complete.

The Urban Greening Factor for the scheme is 0.25, which is below the London Plan target of 0.4 and would not normally be acceptable. Although an intensive green roof, green wall, permeable paving and additional planting are proposed, the size constraints of the site, along with the competing need for plant and amenity space, make it difficult to meet this target. A range of other greening mechanisms are proposed but the 15 semi-mature trees and new shrub planting to be planted on Stanley Road but cannot contribute towards the UGF score as they are outside the site boundary. Applying some flexibility to reflect these factors, the proposal is acceptable in this regard.

While there are objections that the adjoining allotments will be adversely impacted by overshadowing and increased wind effects, the applicants have submitted information to indicate that, while there would be a significant increase in overshadowing, 95% of allotments would still receive 7-11 hours of sunlight and 5% would receive over 12 hours a day during the plant growing season, which is considered more than adequate for horticulture by the Royal Horticultural Society. The submitted wind report confirms that wind tunneling is not expected in the allotments area as a result of the proposed development and that the proposed development would provide some shelter to the allotments from prevailing winds compared to the existing situation.

No on-site parking is proposed other than 5 disabled parking spaces at ground level, one of which would serve the industrial use. As the site is located in a CPZ, residents of the flats would be prevented from obtaining parking permits via a Section 106 agreement.

Transport Services note that the development could contribute to local parking congestion and various following S106 financial contributions towards highway improvements are required to mitigate road safety and parking problems caused by the development. These include junction improvements on Bollo Lane, an improved pedestrian/cycle bridge across the railway line, review and potential extension of the existing CPZ, cycle infrastructure improvements, footway Improvements, traffic calming and pedestrian crossing improvements and local bus stop improvements. TfL also require a financial contribution towards capacity improvements for local bus services. With the conditions and planning obligations agreed, potential transport impacts arising from the proposal will be satisfactorily mitigated.

Pollution and Technical Services do not object to the proposals on noise or air quality grounds but, because the site is affected by noise and odours from the nearby laundry, seek various conditions including an Environmental Noise assessment, an Air Quality and Dust Management Scheme as well as a S106 contribution towards implementing air quality improvement actions within the Council's Air Quality Action Plan. Appropriate conditions are applied.

Various wind mitigation measures are incorporated in the design of the scheme including landscaping, high hedges at terrace level, tree planting, screens and porous balustrades on balconies. With these in place, a Wind Assessment indicates that wind comfort conditions will be suitable for the intended use for all thoroughfares, existing building entrances, proposed building entrances, station platforms, allotment spaces, proposed amenity terraces and proposed balconies.

In terms of impacts on the operation of the adjoining industrial estate, an Agent of Change report indicates that residents of the scheme would not be adversely impacted by odour, dust, vibration and lighting from surrounding industrial uses but also notes there may be adverse impact on residential occupiers from noise from passing trains, building services plant and general industrial noise. Mitigation measures to address these impacts, including acoustic double glazing for levels 2 to 9 on the southern façade, will be secured by condition.

The proposed energy strategy is supported by the Council's Energy Adviser. The development would be all electric with no gas infrastructure on-site. A communal Air Source Heat Pump distribution loop with dwelling heat exchangers would feed panel radiators and provide domestic hot water, with no storage tanks in dwellings. Photo-Voltaic panels are also proposed. This would result in site-wide CO2 emissions being cut by at least 57.8% and would make the development compliant with the London Plan and Ealing Council requirements.

Overall, the scheme will provide a number of planning and regeneration benefits including a significant increase in the housing stock, provision of a significant amount of modern industrial space, 42 affordable units, S106 and CIL contributions towards infrastructure and play space improvements in the area. These can be considered to outweigh the limited deficiencies of the scheme.

In light of the above considerations, on balance, it is considered that the proposed development can be considered consistent with the aims of the relevant policies of the adopted the Ealing Core Strategy (2012), The London Plan (2021), Relevant Supplementary Planning Guidance, the National Planning Policy Framework (2023), the Ealing Development Management Development Plan Document (2013) and Draft Ealing Local Plan (Regulation 19) 2024 As such, it is recommended for conditional approval subject to S106 and S278 legal agreements.

Heads of Terms

The proposed contributions to be secured through a S106 Agreement are set out below.

Contribution Heading	**Proposed Contributions**
Education infrastructure	£224,906
Healthcare provision	£234,337
Bollo Lane Junction improvements	£30,000
Cycle infrastructure improvements	£40,000
Improved pedestrian/cycle bridge across railway	£25,000
Footway Improvements	£15,000
Bus Service Capacity Improvements	£104,000
Bus Stop improvements	£5,000
CPZ Review	£20,000
Traffic calming/pedestrian crossing improvements	£40,000
Travel Plan Monitoring	£3,000
Renewable & Low Carbon Energy Monitoring	£11,528
Carbon offsetting contribution	£92,657
Air Quality Monitoring	£23,690
Amenity space	£105,900
Children's Playspace	£ 2,506
Allotments	£16,499
Affordable Industrial Workspace	tbc
Apprentice and Placement Scheme	£12,500
Total Contributions	**£1,006,523 + tbc**

- Affordable Housing provision of 35% of habitable rooms to comprise 19 social rented (London Affordable Rent) units and 23 shared ownership units;

- An early stage review of affordable housing provision;

- Participation in an Apprentice and Placement Scheme. The Apprentice and Placement Scheme shall provide opportunities across the development, including the construction, design and post construction management of the development. Details of the Apprentice and Placement Scheme including the number of placements details shall be agreed with the Council;

- Restriction of Parking Permits - all the units shall be precluded from obtaining a parking permit and visitor parking vouchers to park within the surrounding Controlled Parking Zones and future CPZs in the area;

- In the event the Carbon Dioxide Emissions Target has not been met within 3 years from the date of last occupation, the Developer shall pay additional carbon offsetting contribution at £90 per ton for the difference.

- Provision of free 3-year car club membership to all residents of the development;

- detailed design of the access from Greenock Road to be funded by the applicant**.** Deed of easement to be provided by the Council as owner of Greenock Road;

- explore potential to provide car club bays on the application site that are accessible by the public;

- if no scope is identified to provide accessible car club bays on the application site, funding of an Accessible Car Club Bay on-street in the vicinity of the site;

- Implementation of the Travel Plan;

- All contributions to be index linked;

- Payment of the Council's reasonable Legal and other professional costs in preparing and completing the agreement.

AND

- A S278 agreement with respect to public realm and highway improvements required in the immediate vicinity of the site.

AND

That the grant of planning permission be subject to the conditions set out in Appendix 1.

Site Description

The application site is 0.14 ha in area and lies in South Acton to the rear of industrial/commercial properties on the east side of Greenock Road and opposite the Ravenswood Court block of flats on Stanley Road. It currently contains surface car parking, an industrial unit and the south-eastern corner of an adjoining industrial estate. Existing vehicular access is from Greenock Road.

The surrounding area contains a mix of commercial, residential and industrial uses. The site is bounded by a pedestrian access path to the north, with 2 storey industrial buildings beyond this. To the south are 2 storey industrial / commercial buildings, and 2 storey industrial/ commercial uses to the west including a builders' suppliers and a café. To the south-east are allotments, which are designated as a Community Open Space. To the east, across Stanley Road, is part of the South Acton Estate undergoing regeneration to provide some 3,800 new dwellings. Part of this regeneration immediately opposite the site is now complete, with the nearest block known as Ravenswood Court and comprising an 8-10 storey building containing 124 residential units.

The site is not within a conservation area, and neither contains or adjoins any listed buildings. It has no designation in the Local Development Plan other than being part of a Locally Significant Industrial Site (LSIS) and within an area of park deficiency. A Site of Importance to Nature Conservation (SINC) runs along the railway line some 100m south of the site.

The site has low accessibility by public transport with a public transport accessibility level (PTAL) of 1b (on a scale of 1-6 where 6 is excellent) and is within a Controlled Parking Zone (CPZ). South Acton railway station lies 240m to the east, Acton Town station 940m to the north-west, and Chiswick Park station some 900m to the south-east. There are two bus routes running nearby with the nearest bus stop 160m from the site.

Planning History

The site has several planning decisions relating to the current industrial premises but none of direct relevance to this proposal.

However, it is important to note that this application, when first submitted in December 2019, proposed a 23 storey tower containing 210 flats with 1,011 sq m of industrial space on the lower two floors. This was a build to rent scheme with 37% of flats having private balconies and 63% of flats being single aspect.

In October 2021, following a large number of objections to the original scheme, a revised scheme was submitted for a ground plus part 9 and part 16 storey mixed-use development containing 859 sq m of industrial space on ground, first and second floor levels with 140 flats above. The main changes included reducing the building height from 23 to 17 storeys, reducing the number of flats by 70, increased building setbacks from the eastern and western site boundaries, change from a Build to Rent scheme to one of flats for market sale, providing all flats with a balcony, increasing the proportion of dual aspect units to 50%, a reduction in industrial floorspace, increase in blue badge parking from 1 to 5 spaces, reduced massing and greater design articulation to elevations with a crown to the top of the building, introduction of a second lift core and 2 residential entrances on Stanley Road, and providing landscaping and tree planting to Stanley Road and the northern footpath.

Further revisions were submitted in September 2023 as set out below. These revisions reflected changes to fire safety regulations, the new South Acton Industrial Masterplan and a new planning application for an 18 storey building of flats above ground floor industrial space on an adjoining site at 8-10 Greenock Road (Ref: 231285FUL).

- a second staircase added to each core to provide an additional means of escape in emergencies;
- creation of a party wall condition along the north-west elevation to protect and facilitate the future redevelopment potential of the adjoining 44 Colville Road site;
- redesign of the northern building plan and elevations to respond to the factors above, including relocating windows and balconies to outward facing facades;
- lower level building chamfers previously proposed to the northern corners extended across all upper floors to create corner windows that improve aspect and passive surveillance;
- minor increase in AOD levels of buildings to allow greater floor to floor heights and more generous ceiling heights for services (with overall building storey heights unchanged);

- upper levels of the southern building aligned with lower levels by extending the eastern façade 0.75m outwards (resulting in increase in overall floorspace);

- an increased industrial space plot ratio to 74%;

- a reduction in total habitable rooms and density due to an increase in the proportion of 1 bedroom units, with the proportion of 3 bedroom family units remaining at 9% based on habitable rooms;

- the affordable housing mix changed to a tenure split of 56% social rent and 44% intermediate, with total affordable units provision to be 42 (35% by habitable rooms);

- reconfiguration of the service yard and car parking layout to facilitate a potential vehicular access to the adjoining development at 8-10 Greenock Road.

The Proposal

This application seeks planning permission for demolition of the existing building and structures, and construction of a ground plus part 9 and part 16 storey mixed-use development comprising industrial space (Use Class E(g)(iii)) on ground, first and second floor levels; with residential units; rooftop amenity space, rooftop plant and lift overruns, landscaping, access, car and cycle parking, plant rooms and all associated ancillary and enabling works. The key elements of the proposed development are now:

- 140 flats made up of 85 x 1 bedroom, 48 x 2 bedroom and 7 x 3 bedroom flats;

- 794 sq m of E(g)(iii)) industrial space (formerly B1c);

- 5 disabled parking spaces within the site; and

- 234 long-stay and 7 short-stay cycle parking spaces.

In terms of affordable housing, 42 of the units proposed would be affordable equating to 35% by habitable rooms.

Environmental Impact Assessment

The applicants have not submitted a request for an EIA Screening Opinion to confirm that the proposed development is not one requiring an Environmental Impact Assessment. Careful consideration has been given to the location, scale and nature of the proposals, which would primarily involve a residential development with a modest industrial/commercial element and take place largely on a 0.14 ha previously developed site within an existing urban area. The site does not contain or closely adjoin any environmentally sensitive areas as defined by the EIA Regulations or areas of high flood risk. The nearest Site of Importance to Nature Conservation (SINC) is some 100m south of the site.

The proposed development also falls below the indicative thresholds for Schedule 2 development, which are 5 ha in site area and 150 dwellings. The proposals also do not, in scale or effect, meet the criteria in Schedule 3 of the EIA Regulations. It is not therefore considered that this proposal is one requiring an Environmental Impact Assessment.

Consultation:

Public Consultation – Summary

Neighbour Notification	On the original application, Major Site notices were posted with an initial consultation period of 22/01/2020 – 12/02/2020. Over 520 representations were received from local residents. There was one in support of the affordable housing proposed. All others were objections with the main ones as follows: • proposed building far too high, visually intrusive and out of character with area; • building out of scale and out of proportion with Acton Garden estate; • higher than tower blocks recently demolished on South Acton estate; • Townscape and Visual Impact appraisal understates visual impact of the building; • overdevelopment of the site and excessive density; • overlooking and overshadowing of nearby dwellings; • all of the one bed flats would be single aspect north facing units; • inadequate separation from Ravenswood and Welbeck Court dwellings with resultant overlooking of windows; • severe impact on single aspect one-bed flats in nearby Stanley Road flats; • lack of open space within scheme in an area of park deficiency; • more flats will increase traffic and parking pressures in area; • insufficient parking proposed within scheme; • inadequate residential infrastructure and local amenities to support such a development; • increased strain on schools, health and other community facilities; • will strain already overcrowded local public transport; • adverse wind tunnel effects and assessment of them inadequate; • impact on sunlight will harm use of nearby allotments; • visual impact on houses along Weston Road and roads to east will be very severe and intrusive; • height, loss of daylight and wind shear will adversely impact green corridor along the railway line, green spaces and trees in Acton Gardens Masterplan; • lack of access for emergency vehicles will affect fire safety for this high building; • conflict with aims of Acton Gardens Masterplan to deliver quality medium rise housing; • will result in loss of 9 disabled parking spaces on Stanley Road; • erosion of the Industrial Estate; • light industrial units will not be viable due to lack of vehicle access and loading bay space; • road safety risk for increased number of pedestrians; • flats would be impacted by emissions from adjoining industrial uses; • occupants of this mainly rented scheme will be transient with no commitment to the local area or community; • 3 weeks is insufficient time to respond to such a significant development proposal.

There were also 2 representations in support of the original scheme on the basis of:

- new building would improve an unsightly industrial site;
- regeneration of the area and increase in housing stock.

Further consultation took place on the revised scheme with site notices posted between 8.12.2021 and 29.12.2021. A further 27 objections were received the main points being:

- proposed building too high and out of keeping with area;
- will change the character of the area;
- high tower will loom over neighbouring buildings with overbearing effect;
- overdevelopment;
- excessive density in a location with poor PTAL;
- adverse impacts on local views;
- erosion of the industrial estate leading to loss to local employment;
- impacts on privacy and light to Welbeck Court and Ravenswood Court;
- will lead to significant increases in traffic;
- lack of public green space in the proposal and will increase pressure on other open space;
- negative impacts on the allotments with 6 hours inadequate sunlight in summer;
- will increase adverse wind tunnel effects;
- increased pressure on local community services, parking and transport
- deliveries will increase congestion and pollution in the area;
- high-rise buildings are proven to be much more polluting than low-rise.
- no decision should be made without an independent assessment of the applicant's Daylight and Sunlight Impacts on Neighbouring Properties;
- no decision should be made until Ealing Council's policy on tall buildings is published and implemented;
- no decision should be made until a full AMR and Five Year Housing Land Supply and Trajectory has been published;
- high building in this location conflicts with Acton Gardens masterplan strategy;
- not clear how delivery, trade, and private vehicles would be prevented from using the end of Stanley Road and creating an unsafe pedestrian environment;
- inadequate access and turning area for fire engines beside the tall building;
- lack of amenity space unacceptable in area of park deficiency and cannot be acceptably mitigated by S106 contribution.

Six further representations were submitted when re-consultation took place between 04.10.2023 and 25.10.2023 on the additional revisions to install a second fire staircase. One of these was no objection. The objections can be summarised as:

- loss of sunlight on neighbouring buildings

	• sunlight and daylight conditions of the single aspect flats in Ravenswood Court and Welbeck Court will be severely and negatively impacted • loss of sunlight to allotments • all the one bedroom flats would be single aspect north facing units • substantial over-development of a very small site • no increase in open space provision for increased residents in area • building is completely out of scale and proportion with the Acton Gardens Estate. • the building will be very visible and intrusive and not in keeping with the context and emerging urban grain of the area • high rise residential development will conflict with aims to enhance South Acton industrial Estate, a Locally Significant Industrial Site • views from all roads to the east will be badly affected by the scale of the building and the impact on South Acton allotments will be very severe. • flats in the proposed blocks will have a clear view into bedrooms and dining/kitchen spaces of Welbeck Court and Ravenswood Court • increased residential development within an LSIS will lead to loss of local industrial firms • funneling of wind caused by the new building will affect growth of vegetation in the allotments and safety of residents in nearby buildings • increased pressure on already busy Chiswick Park and Acton Town tube stations • increased pressure on local car parking
External Consultation	
Ealing Civic Society	Objected to original scheme on following grounds: • design of tower block is very bland with none of the interest or variety of architectural styles in the nearby Acton Gardens Estate; • the unit mix, with few 3-bedroom units, does not respond to the local housing need, • many of the proposed units continue to be single aspect, creating unacceptable living conditions; • significant shortfall in amenity space since the rooftop provision is considered inadequate, particularly for small children, and no on-site play space is available for over-5s; • lack of surrounding community infrastructure; • proposed green screen at ground level abutting the allotments, unless conditioned to be maintained, would present a potential liability. No further comments on revised scheme.

Kew Gardens	Objected to original proposal on basis of possible visual impact of 22-storey tower as seen from the Kew Gardens World Heritage Site; the Townscape and Visual Impact Appraisal does not contain verified views taken from within Kew Gardens and should include views from the Great Lawn, to the south west of the Orangery, and from the Temple of Aeolus. No comments received on revised proposals.
Health & Safety Executive (HSE)	Raise concerns on lack of fire hyrdants within 90m of the building entrance and require additional fire hydrant provision; also concerned on lack of information on functional status of the existing fire hydrant near the site.
Acton Green Residents Association	No response.
Acton Community Forum	No response.
South Acton Residents Action Group	No response.
South Acton Allotment Gardeners Society	Objected to original scheme on grounds that it would cause a serious loss of sunlight on much of the South Acton West allotment site in conflict with Ealing's Adopted 2004 Plan for the Environment, and that allotments need much more sunlight for cultivation of vegetables and fruit than estimated by the applicant's sunlight study. Objects to revised proposal on basis of: • over development of 140 flats on the tiny footprint 0.15 ha • new residents will place greater pressure on existing amenity spaces; • undermines Ealing Council's and Acton Gardens Development's vision of a sustainable neighbourhood; • 17 storeys out of keeping, scale, proportion with Acton Gardens Estate. and landscape and buildings to the east and south of the railway; • adverse visual impact from a 17 storey wall of concrete within 1.5 metres of the allotments; • will cause significant loss of sunlight to much of the South Acton Allotment west site; the BRE standard is not a horticultural standard for cultivation of vegetables and fruit during the growing season; • will cause increased shading from 14:00 until sunset for up to 90% of the allotment plots in summer; the overshadowing report does not cover beyond 15:00 in winter or accurately reflect the degree of shadowing;

	• the proposed building will create new canyoning and vortex effects, greatly increasing the adverse 'wind tunnel' effects, not conducive to gardening; • removal of the existing slatted concrete wall on the western boundary of the allotment site will increase the prospect of damaging wind effects at the site; • wind reports are based on limited wind tunnel tests and conjecture formulated at 'workshops' and insufficient to give assurance of limited wind effects; • distance between the eastern façade of the building and the allotment site is only 1.5m and removal of existing concrete boundary walls on west boundary of the allotments will adversely affect the privacy, peaceful enjoyment of the allotments and make the site less secure; request a solid wall of the same height along the boundary line; • concerns on safety for users of the allotments during construction activities and subsequent maintenance of a 17 storey building, and impact if fire-fighting access needed. • increased parking pressures on limited road spaces which are heavily used; • removal of 9 parking spaces in Stanley Road during the Construction Phase of the development would affect allotment plot holders visiting the site with a vehicle and residents of Ravenswood Court; • 'turning space' at southern end of Stanley Road is beside the allotment entrance and access point for the disabled access plot - placing construction offices there will restrict vehicle movements, including fire engines; • landscaping at southern end of Stanley Road does not fully consider surface water drainage requirements and will increase the risk of flooding to inside the allotment entrance and the disabled access plot.
Ealing Central and Acton MP	No response.
GLA	• delivery of 140 flats is supported. • increase in industrial capacity plot ratio to 74% is welcomed and should confirm if this is greater than the existing capacity on site and local consideration of the South Action Industrial Master Plan; this provision should be secured with adequate floor to ceiling heights, access and servicing arrangements, suitably sized lifts and uses within classes E(g)iii, B2 and B8.

	• 35% affordable housing is proposed by habitable room with a 56/44% tenure split between social rent and intermediate; subject to the appropriate light industrial floorspace, affordability and eligibility criteria being secured, this complies with the Fast Track Route criteria; • general site layout does not raise strategic concerns and has moved in a positive direction; overall reduction in height but still exceeds the draft South Acton masterplan height limits; as scheme does not comply with London Plan Policy D9 Part B, full consideration should be given to Part C; the architecture does not raise strategic concerns; • any off-site play-space should be clearly accessible and inclusive and to be secured by the Council; • Agent of Change considerations will be assessed at Stage II; • views not yet provided to assess impacts on Royal Botanic Gardens Kew Gardens World Heritage Site (and associated listed buildings); any harm identified needs to be outweighed by public benefits of the scheme for GLA to consider. [*Planning Officer: this is assessed in Heritage Report*] • any green walls/vertical climbers should be removed in the interest of fire safety and combustible materials; the revised Fire Statement appears to be missing a declaration of compliance in line with Fire Safety LPG. • Circular Economy, Whole Life Carbon and energy matters remain largely unchanged from previous situation; • the Urban Greening Factor is 0.25, below the 0.4 London Plan target but could be accepted given the site constraints; would encourage this to be captured by S106 contributions. • SuDs and water efficiency methods should be given further consideration and secured.
Heathrow Airport Ltd.	No safeguarding objection.
NATS	No safeguarding objection.
HS2 Ltd.	No response.
NHS Property Services	Require contribution of £234,337 towards healthcare infrastructure in the area.
Environment Agency	No response.
Thames Water Utilities	No objection with regard to foul water sewerage network infrastructure capacity but requires condition on surface water wastewater such that no flats are occupied before network upgrades required to accommodate the additional flows from the development have been completed, or a housing

	and infrastructure phasing plan has been agreed with Thames Water. Also require various informatives to be added.
London Ambulance Service	No response.
London Fire & Emergency	No response.
London Underground Infrastructure Protection	No comment.
Historic England (GLAAS)	No archaeological requirement
Ministry of Defence	No safeguarding objection to original proposal but requested condition to ensure that the MOD is notified of when and where cranes, which may affect air traffic safety, will be erected.
Metropolitan Police/ Design Out Crime	Noted rear of development lacks natural surveillance and active frontage and a vehicle gate and pedestrian gate will be required and certified to LPS1175 SR:2; the cycle stores should be enclosed in a secure building. Recommends destination controlled lifts and a comprehensive access control strategy along with single leaf communal doorsets and entry systems. Pleased that revised plans have taken on board previous recommendations but request a condition to require Secured by Design accreditation.
Network Rail Infrastructure Ltd.	No response.
Transport- for London	• as vehicle access is from the privately owned Greenock Road, need to demonstrate that the proposed development has rights of access; • pedestrian access from Stanley Road is via a private car park or pedestrian passage between Stanley Road and Colville Road and a high quality environment to the pedestrian access points needed with rights of access demonstrated; • the Active Travel Zone (ATZ) assessment is from 2019 so unclear if impact of this development on the surrounding active travel network has been appropriately assessed; a night-time ATZ should be undertaken; • car free development with some disabled parking is supported but and restriction on parking permits and contribution towards reviewing parking controls should be secured via a S106; • a Parking Design and Management Plan, secured through an appropriate mechanism, should demonstrate how a further 7% of dwellings can be given a disabled person parking bay when demand arises;

	• slight increase in long-stay cycle parking spaces required; it should be demonstrated that the 'worse-case' scenario in regard to cycle parking provision for the proposed non-residential use can be accommodated; • cycle parking to be designed to accord with London Cycle Design Standards; • proposal acceptable in strategic traffic terms; • S106 contribution of £104,000 to be secured towards bus service enhancements to mitigate increased bus trips from scheme residents; • Delivery and Service Plan to be secured by condition and include consideration of management of home deliveries; • further thought needed on Delivery and Service Plan regarding how the scheme works with the adjoining site as it appears to be tight with some encroachment on the public realm; • full Travel Plan for all uses to be secured with targets to align with the Mayor's strategic mode shift target, and measures to focus on sustainable and active travel modes; • Construction Logistics Plan to be secured by condition.
Internal Consultation:	
Building Control Services	No response.
Regulatory Services (air pollution)	No objection on air quality but require conditions on Ventilation Strategy Report, Non Road Mobile Machinery, diesel generators and an Air Quality and Dust Management Plan; S106 contribution of £32,180 sought towards implementation of air quality improvement measures in the London Borough of Ealing's Air Quality Action Plan.
Regulatory Services (noise)	With regard to original scheme, the submitted Noise report provides insufficient information about the noise environment. The site is affected by noise and odours from the nearby laundry. No objection on noise but required an updated Environmental Noise report, and various conditions relating to noise mitigation, lift noise, insulation between flats and between flats and industrial uses, hours of operation of the commercial/industrial uses, and provision of a Construction/Demolition Management Plan. On the revised scheme, noted that the new acoustic report indicates higher ambient noise levels (LAeq) were measured during 2018 than in August 2023 probably because recent measurements were carried out during summer holidays when many people are away and everything is much quieter. No objections raised but revised conditions recommended.
Environmental Services (Contaminated land)	No objection but require conditions on site investigation, remediation and verification.

Waste and Street Services (Refuse)	No response.
Landscape & Tree Officer	Welcomed scheme changes which provide a far better amount of amenity provision but scheme is deficient in external amenity space, public open space, children's play space and allotment space and S106 contributions sought towards all of these totalling £171,068. Conditions requested on details of children's play areas including safety surfacing and equipment, hard and soft landscaping, boundary treatment, Landscape Management Plan, green and brown roof construction, specification and maintenance schedule. sustainable urban drainage systems. No further comments on revised scheme.
Flood Risk Officer	No response.
Transport Services	No objections but seek following S106 obligations/contributions: • scheme residents to be denied residents' parking permits; • provision of car club free membership to all residents for 3 years; • £178,000 sought towards junction improvements, traffic calming measures, cycling infrastructure, improved footbridge over railway, CPZ review, footway and bus stop improvements and travel plan monitoring; Conditions also requested for submission of delivery/servicing plan, construction logistics plan, parking management plan, proposed parking bays to be provided with electric charging points and submission of a plan showing the internal layout of the proposed road. No further comments on revised scheme.
Highways Manager	No response.
Housing	Noted the original scheme was not eligible for fast track approach as it proposed 35% affordable housing but a tenure split of 40% for rent / 60% intermediate and the Council's requirement is 60% for rent / 40% intermediate. For the revised scheme. supports the tenure split of 56% social rent (LAR) and 44% intermediate and 35% affordable units by habitable room; also supports size mix of the social rented homes including 7 x 3 bedroom homes; requests the intermediate units are available to a *range* of incomes and not just aimed at those at the top of the £90,000 income cap.
Education Services	Require S106 contribution of £224,907 towards education infrastructure.
Regeneration	Requires developer to provide a Local Employment & Training plan and including: • S106 contribution of £12,500 for coordinating and monitoring training and employment opportunities. • apprenticeships during construction phase

	• 11 work experience opportunities for 16+ years old • developer to work with Councils' brokerage service to set up the above opportunities; • notification of all job, apprenticeship and work experience vacancies at levels 4 and below to LB Ealing's job brokerage service; • 25% of all vacancies to be filled by Ealing residents with a long-term connection to the borough; • non-negotiable penalty of £10,000 per apprenticeship if apprenticeship opportunities not created. No further comments on revised scheme.
Energy/ Sustainability Adviser	Supportive of Energy Strategy; requires S106 contributions towards low-carbon/renewable energy monitoring and for Carbon Dioxide Off-setting. This is detailed within the Heads of Terms. Conditions also required on Whole Life-Cycle Carbon Assessment, Circular Economy, post construction energy equipment monitoring, implementation of the approved sustainable design and construction measures and on energy monitoring.
Strategic Planning	No response.
South Acton Councillors	Objection to original scheme by Cllrs. Blacker, Sabiers and Johnson on grounds of: - inadequate provision of affordable housing; - lack of private amenity space with less than half of units meeting the requirement; - shadowing of windows and balconies of Ravenswood Court properties and shared amenity spaces for Ravenswood and blocks at Acton Gardens; - significant impact on daylight to South Acton allotments; - poor monolithic design and not the exceptional architectural quality required for a tall building. No response on revised scheme.
Southfield Councillors	No response.

Given the very large number of objections and the wide range of issues raised in them, comments on them are made within relevant sections of the report.

It is also noted that the applicant carried out pre-application and post-application discussions with planning officers since November 2018. Following this, the applicant engaged in pre-application dialogue with local residents and other key stakeholders throughout the design evolution stage of the project. This consultation process also included two public exhibition days, local councillor briefings, two meetings with Ealing Civic Society, a meeting with the Ealing Allotment Partnership, two rounds of Public Consultation Webinars in May and September 2021 and two sessions with the Ealing Design Review Panel in April and October 2021.

Relevant Planning Policies:

The policies relevant to this application are listed in the informatives section in Appendix 1.

Reasoned Justification:

Main Issues

The main issues in assessing this proposal are the principle of the development which involves mainly residential development on an existing industrial site, the quantum of development, the design and impact on the character and appearance of the adjoining area, the scale of the proposed building and its relationship with surrounding properties/overall context, the impact on amenity of adjacent uses, the quality of internal living environment for residents, the transport impact of the development, sustainability and potential operational aspects. Other issues to be considered include housing mix and affordable housing, crime prevention, accessibility, refuse and recycling storage, and the Community Infrastructure Levy.

Principle of Development

Increasing the current housing stock is an important strategic objective for the London Borough of Ealing. Policy H1 of The London Plan (2021) aims to optimise the potential for housing delivery on all suitable and available brownfield sites especially in areas with PTAL levels of between 3-6 or within 800m of a station, and on industrial sites that have been identified as being suitable for co-location. This is supported by London Plan policy D3 which aims to make the best use of land by following a design led approach that optimises the capacity of sites.

However, the site forms part of a Locally Significant Industrial Site (LSIS). Ealing Core Strategy Policy 1.1 (C) seeks to promote business and enterprise by securing the stock of employment land and encouraging regeneration and renewal.

London Plan Policy E7(indicates development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 in selected parts of LSIS sites. It notes that, in LSIS sites, the scope for co-locating industrial uses with residential and other uses may be considered but this should be part of a plan-led or masterplanning process. This should also be subject to the industrial activities on-site and in surrounding parts of the LSIS not being compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation, the intensified industrial, storage and distribution uses being completed in advance of any residential component being occupied and appropriate design mitigation being provided in any residential element relating to safety and security, access, design quality, public realm, visual impacts, vibration and noise and air quality.

The proposed development involves the demolition of units 6 and 12 Greenock Road, comprising 77 sq m of industrial floorspace. The proposed development would replace this with 794 sq m of light industrial floorspace at ground, upper ground and first floor levels. This would result in a net increase in floorspace of 717 sq m. As such, the proposed development would result in intensification of the LSIS site and provide additional industrial capacity in accordance with Policy E7 and Policy E6 of the Reg19 Draft Ealing Local Plan.

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The initial GLA Stage 1 report on the original application indicated that it could be supported in principle despite, at the time, the absence of a plan-led or masterplanned approach to the consolidation and release of the wider LSIS. With regard to the revised scheme, the GLA support the increase in industrial capacity to a 74% plot ratio but want this provision to be secured to reflect London Plan

policies regarding floor to ceiling heights, access and servicing arrangements, suitably sized lifts and the uses falling within classes E(g)iii, B2 and B8.

In response, the applicants note that the scheme comprises a single double height unit extending to 77 sq m GEA with better servicing arrangements so that the proposed development provides much greater industrial capacity than the existing 6% and confirm that the proposal is for light industrial only (use class E(g)iii). This use would be secured by condition.

As noted above, Policy E7 requires such development in LSIS locations to be delivered as part of a plan-led process. This is reiterated by Policy E6 of the Draft Ealing Local Plan (Reg19) which states that "mixed intensification may be suitable on LSIS in cases where a masterplan is agreed within Ealing". Similar forms of mixed use development have been allowed within the local area along Bollo Lane and Stirling Road, which have included 2-10 Roslin Road and 29-39 Stirling Road (192130FUL and 204553FUL), 1 Stirling Road/1-9 Colville Road And 67-81 Stirling Road (214611FUL and 232800FUL) and 3-15 Stirling Road (214991FUL). These applications were considered within the context of a Framework Masterplan developed by Hawkins/Brown, which set out basic design parameters that guided development of this urban island area. This application site, however, falls outside the defined area of that Framework Masterplan.

South Acton LSIS Masterplan

Since the approval of these applications nearby, significant pressure on further development within the LSIS has occurred. In response, the Council has developed, in consultation with landowners and developers in the area, a Masterplan for the South Acton Industrial Estate in line with Policy E7 of the London Plan and Policy E6 of the Ealing Draft Local Plan.

Ealing Council commissioned this masterplan, prepared by Haworth Tompkins in collaboration with other development partners in April 2023. Its overall aims were to:

- provide a Framework for industrial-led development to create a successful place;
- support the assessment of future planning applications within the LSIS;
- protect and enhance diverse local industrial employment space;
- give confidence to businesses, landowners and developers to make decisions.

The masterplan was developed in consultation with the LBE project team, including officers from the Council's Planning and Regeneration teams, as well as many external stakeholders, including TFL, the GLA, local landowners and developers. A number of stakeholder workshops were carried out in June, July and September of 2023, with feedback provided and considered.

The Masterplan process began with establishing the baseline, including the site's history, existing and emerging context, site character, streetscape, existing land uses and total floorspace, types of businesses, transport connections, access, parking, connectivity and public realm and green space. This resulted in design guidance and an overall masterplan proposal.

A key element of this Masterplan is to establish where co-location of industrial and residential uses would be appropriate. A zoning option was considered as the most appropriate method of identifying where such mixed-uses should be concentrated and where sites should be restricted to pure industrial uses. The preferred approach is shown in the plan below, with the sites appropriate for co-location shown in blue and those restricted to industrial uses in red.

Figure 4: Masterplan Zoning Option for Co-Location (Blue), Solely industrial (Red) and Residential (Yellow)

Advantages of this option include the ability for the pure industrial and co-located areas to be clearly separated by road, better opportunities for placemaking on the east west route to South Acton Station and preventing piecemeal co-location schemes by clearly defining the appropriate spaces for mixed-use development. This proposal falls within the co-location zone and is therefore in accordance with the broad principles of the Masterplan.

The Masterplan also defines appropriate building heights and densities. Guidance limits for height and density were based on review of approved and emerging schemes within the area, and establishing principles through a Benchmarking exercise with account taken of the distinct lack of green space within the LSIS. Based on an assessment of local green space requirements, a density target of 300 dwelling units/ha was considered appropriate. The density of this proposed development, at 1,000 units/ha, would significantly exceed this target, and also exceeds the densities of other recently consented schemes in the area.

The Masterplan also identifies areas of the LSIS where public realm improvements could be delivered, including potential spaces for future pocket parks or public squares which would meet the placemaking objectives of the Masterplan and increase the amount of green space. The small footprint if this application site restricts its potential to provide more open space. These are considerations that would need to apply to any development of other sites within the co-location zone in future.

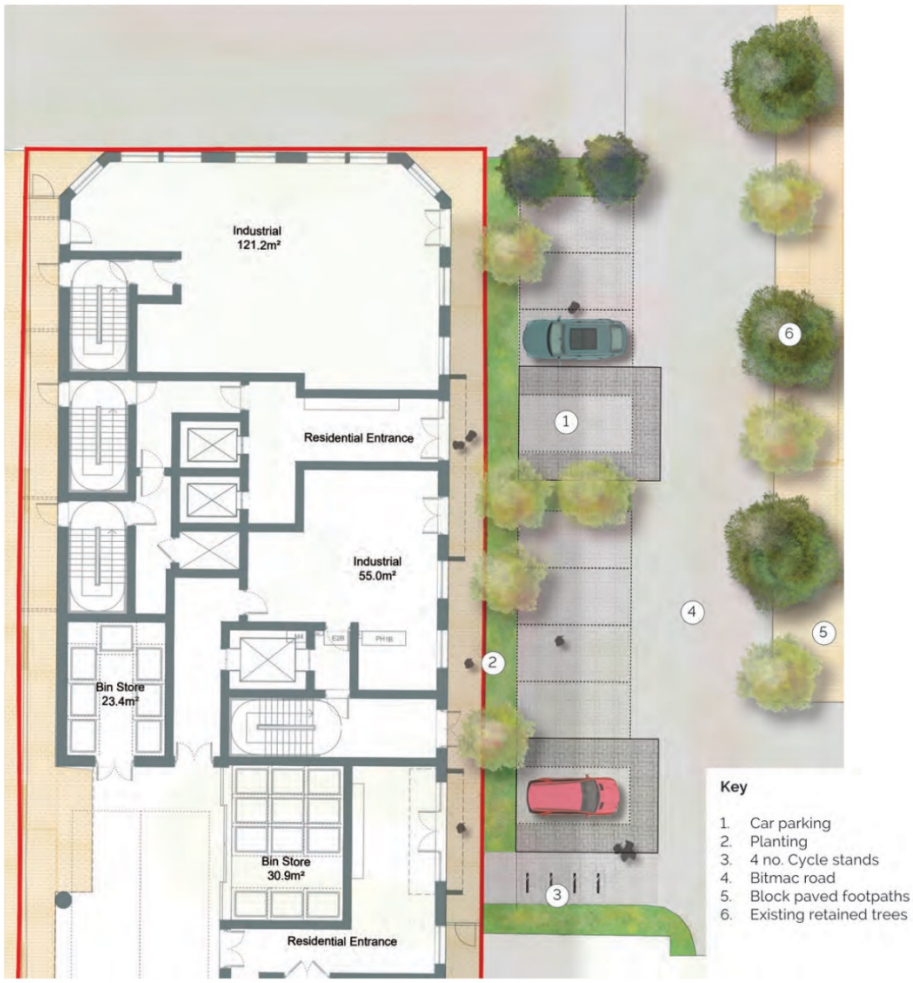


Figure 5: Proposed Public Realm Improvements

In addition, maximum building heights are identified for parts of the Masterplan area as shown in the plan below:

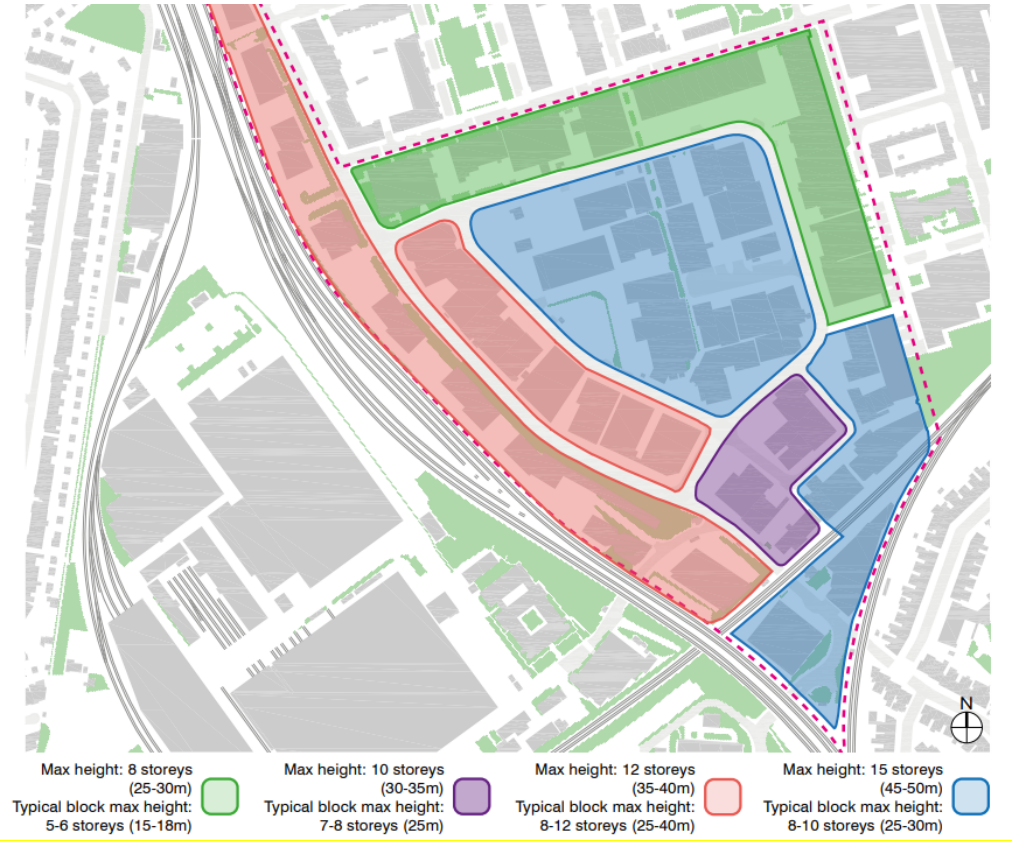


Figure 6: Masterplan Building Height Limits

The area shaded in blue, in which this application site lies, should have maximum building heights of 15 storeys, with a typical block height of 8-10 storeys. The proposed development, with a height of 17 storeys, would exceed this maximum height. However, the Masterplan states that schemes that breach these thresholds by a limited margin may be acceptable, but only where schemes are:

- delivering successful industrial intensification
- meet other relevant plan policies; and
- secure additional benefits that improve the function, quality and amenity of the masterplan area.

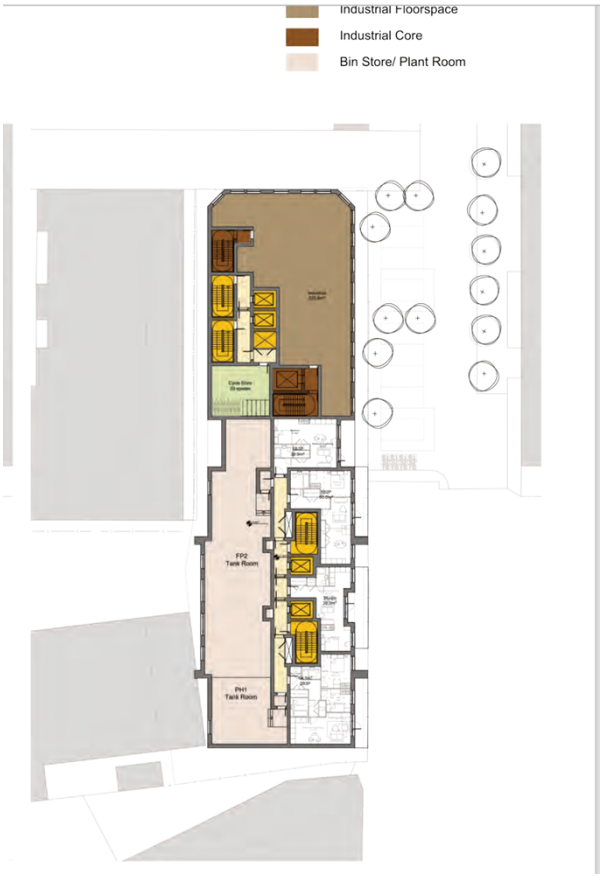


Figure 7: Proposed Ground Floor Showing Industrial Space and Off-street servicing area

In terms of industrial intensification, this proposal would result in a substantial uplift in the amount of industrial floorspace from 77 sq m to 794 sq m, a total gain of 717 sq m, or an almost 10 fold increase. The existing industrial premises are also old and in poor condition. The new industrial space would be provided on ground, first and second floor levels, allowing for maximum flexibility for the space to be subdivided for different occupants, or allow a large space for a single occupant. The scheme would also deliver internal floor-to-ceiling heights of 3.4 to 4.3m, and a double height loading area, which will be attractive to a wide range of occupants.

In accordance with London Plan Policy, the proposed development would also increase employment opportunities on site. It is estimated that existing buildings on the site have capacity for only 2-3 FTE jobs at typical employment densities. The proposed development would deliver the potential for between 25 to 40 FTE jobs, in more modern, efficient and functional space. Therefore, the proposal would not only increase the amount of available floorspace, it would also increase the employment potential of the site, aligning with the Council Plan 2022-2026 to create good quality jobs.

The applicant indicates that the proposed light industrial (formerly B1c) floorspace, on the advice of local agents with specialist knowledge of the market sector, has been designed to target flexible and creative industries and provide commercial floorspace for SME/small industrial/craft/co-maker spaces that can be easily adapted to accommodate a variety of different uses. They consider this use class is the most appropriate for the existing constrained site, as it is unlikely to warrant the need for a large yard space to support business activities or customer car parking.

The scheme complies with other requirements of the Masterplan in that:

- off street loading bays / vehicle servicing are provided for industrial units with adequate off-street servicing;
- the facade character would align with principles in the masterplan with an acceptable frontage design acceptable including brickwork, a gridded façade and an active street frontage;
- some street greening proposed.

Overall, this proposal would result in a number of public benefits which improve the function, quality or amenity of the masterplan area, as follows:

- a net gain of 717 sq m of modern industrial floorspace and 25-40 more local jobs;
- improved access and servicing arrangements with the adjoining site;
- public realm improvements and tree planting on Stanley Road outside the development;
- 42 affordable flats (35% by HR) of which 19 would be for social rent.

On balance, the proposal can be considered to comply to a reasonable extent with the South Acton Industrial Masterplan. It is therefore considered acceptable in land use terms and consistent with sections 5, 8 and 11 of the National Planning Policy Framework (2019); policy E7 of the London Plan (2021) and policies 1.1 (a) (b) (e), 1.2 (b), 2.1 (a) (c), 2.10 of the adopted Ealing Core Strategy (2012).

Housing Land Supply

This application needs to be considered in the context of the Borough's housing land supply position. Paragraph 74 of the NPPF advises that 'Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

The Council is currently compiling the evidence needed to confirm its position regarding the level of deliverable supply, and once completed this will be documented in an update to the latest AMR (October 2021). For reasons outside the Council's control the completion of this exercise has been delayed awaiting the migration of missing pipeline data into the GLA's Planning London Datahub. The GLA's London Development Database (a 'live' system monitoring planning permissions and completions) was replaced in 2020 by the Planning London Datahub. During this transition between databases, there was a gap in coverage where neither database was operational and this prevented permission data being captured for a significant period, which has given rise to the incomplete pipeline. This incomplete pipeline poses a significant barrier to establishing future levels of deliverable supply. Typically, most of the supply identified through a five year land supply is expected to be derived from the pipeline of permissions.

Because of the non-availability of this information from the GLA, in this period of uncertainty, the Council is not able to conclusively demonstrate that it has a 5-year supply of housing land, or what level of shortfall there may be if there is one.

Whilst the possibility of a shortfall pertains, the National Planning Policy Framework 2023 (NPPF) presumption in favour of sustainable development – the so-called 'tilted balance' – is engaged. NPPF para. 11 (d) ii states that in these circumstances the development plan policies most important for determining the application are to be treated as out-of-date.

Therefore, in the current circumstances national policy is that planning permission should be granted for development that optimises the capacity of sustainable housing sites unless:

1. assets of particular importance, such as for example, heritage, environment, flood risk, ecology, protected countryside, provide a clear refusal reason, or
2. any adverse impacts of the development would significantly and demonstrably outweigh the benefits of granting permission, when assessed against the policies in the NPPF considered as a whole.

The Committee should also note the Court of Appeal judgment in Gladman Developments Ltd v Secretary of State for Housing, Communities and Local Government (2021) that in the plan-led Planning System the decision-maker (i.e. the Council) is entitled when determining the application to take into account and weigh other development plan policies relevant and applicable to the application, such as for example design, scale, amenity, contribution towards meeting affordable housing need, as well as the non-exhaustive list of matters noted in 1 above.

Mix of Residential Units

London Plan Policy H10 indicates that schemes should generally consist of a range of unit sizes having regard to factors including local evidence of need, the 2017 London Strategic Housing Market Assessment, the requirement to deliver mixed and inclusive neighbourhoods and the need to deliver a range of unit types at different price points across London.

The proposed 140 residential units would have a range of sizes with more smaller 1 bedroom units (53%) but also with 47% larger, family-sized 2 and 3 bedroom units, as shown below.

Quantum of Proposed Residential Provision	
1 bedroom / 1 person	16 (11%)
1 bedroom / 2 persons	69 (49%)
2 bedrooms / 3 persons	44 (31%)
2 bedrooms / 4 persons	4 (3%)
3 bedrooms / 5 persons	7 (5%)
Total	140 (100%)

Policy H10 makes clear schemes should generally consist of a range of unit sizes with an appropriate mix of unit sizes to be assessed taking into account factors such as local evidence of need; delivering mixed and inclusive neighbourhoods; delivering a range of unit types at different price points; the need for additional family housing and the role of 1-2 bed units in freeing up existing family housing; a higher proportion of 1-2 bedroom units being more appropriate on sites near town centres or stations or with higher public transport access.

In this context, the proposal contains 60% of 1 bedroom units and the application site is not close to a town centre or station and has relatively poor public transport access. The proportion of 1 bedroom units has increased from 52% in the previous version of the scheme, with a reduction in the number of 2 and 3 bedroom units.

The GLA Stage 1 report on the original proposal indicated that the then 7.6% proportion of family size accommodation within the scheme, all of it affordable housing, was acceptable, noting the constraints and transport accessibility of the site. The GLA have not commented on the mix in the revised scheme, which contains a higher proportion of family sized housing.

On balance, the proposed 8% provision of 2 bedrooms / 4 person units and three bedroom / 5 person units along with the 31% of 2 bedroom/ 3 person units that would also be suitable for some family accommodation is considered acceptable in this location.

Affordable Housing

Policies H5 and H6 of the London Plan seek to maximise the delivery of affordable housing, setting a strategic target of 50% affordable housing. Policy H5 and the Mayor's Affordable Housing and Viability SPG also set a strategic target of 50% affordable housing. For Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses Policy H6 indicates that the 50% threshold for fast track consideration may reduce to 35% where the scheme results in no net loss of industrial capacity, which is the case here.

The Ealing Core Strategy sets a borough-wide strategic target of 50% affordable housing. Policy 3A of the Ealing Development Management DPD requires 50% affordable housing provision with a 60/40 split of social or affordable rented accommodation to intermediate provision. With respect to tenure mix, the Ealing SHMA indicates that affordable housing should contain a split between rented and intermediate housing.

Policy H6 of the London Plan (2021) seeks to secure 30% of the total affordable housing as low cost rented units (London Affordable Rent or Social Rent), at least 30% as intermediate (London Living Rent and London shared ownership) and the remaining 40% determined by the local planning authority as low cost rented homes or intermediate products based on identified need.

Unit Size	Market Units	Affordable Units
1 bedroom /1 person	16	0
1 bedroom /2 person	51	18
2 bedroom /3 person	31	13
2 bedroom /4 person	0	4
3 bedroom /5 person	0	7
Total Units	98 (70%)	42 (30%)
Habitable Rooms	211 (65%)	115 (35%)

Of the proposed 140 flats in this development, 42 units would be affordable, comprising 18 x one bedroom units, 17 x 2-bedroom units and 7 x 3 bedroom / 5 person units. 35% of units by habitable room would be affordable, as set out above.

The Council's Housing section objected to the proposed affordable housing tenure mix in the previous scheme, which was 42% for social rent and 58% intermediate. This was because, although it would provide 35% affordable housing, it did not meet the Ealing policy requirement for 60% for rent and 40% intermediate. The Housing section wanted the 40% element to be mainly London Affordable Rent units given is a severe shortage of social and London Affordable Rented accommodation in Ealing, and shared ownership is not seen as a genuinely affordable product with no shortage of this type of accommodation in Ealing.

The applicants were requested to provide more London Affordable Rent units in place of the proposed 60% intermediate element, with an alternative of replacing half the intermediate units with London Living Rent (LLR) units and/or Discounted Market Rent units at LLR rent levels. The applicants did not accept this approach in the previous scheme. They argued that, given the extensive amendments made including an overall loss of 70 units, a 60% social rent/40% intermediate tenure split was not possible given viability concerns, site constraints on the building footprint, and the need to provide efficient internal layouts with separate cores to meet Registered Provider requirements. They also indicated that the scheme would be unviable with the Council's preferred tenure mix and the proposal reflected the lowest profit level at which the applicant was prepared to develop.

The applicants submitted a Viability Assessment of the scheme. This was reviewed by the Council's viability advisers, Gerald Eve in May 2023, who noted that the proposal did not include a policy compliant mix of tenure with 40% social and 60% shared ownership. They concluded that the offer of 35% affordable housing with this tenure mix is not the maximum reasonable that can be provided and that an identified surplus of £1.5m would enable the scheme to delivery 35% affordable housing with a 60% social and 40% intermediate mix in accordance with Ealing policy.

Following this, the scheme was revised so that the affordable tenure split would now be 56% Social Rent and 44% Intermediate by habitable room, as shown below. The applicants explain that, through the reconfiguration of the floor plans to accommodate the second stairs, they have sought to prioritise social rent units to meet Council standards.

Unit Size	Social Rent	Intermediate
1 bedroom /1 person	0	0
1 bedroom /2 person	0	18
2 bedroom /3 person	8	5
2 bedroom /4 person	4	0
3 bedroom /5 person	7	0
Total Units	19 (45%)	23 (55%)
Habitable Rooms	64 (56%)	51 (44%)

The GLA note that the revised scheme's latest affordable housing offer would comply with the Fast Track Route criteria subject to the appropriate light industrial floorspace, affordability and eligibility criteria being secured.

The Council's Housing section supports the revised tenure split of 56% social rent (LAR) and 44% intermediate units in the revised scheme and 35% affordable units by habitable room. It also supports the size mix of the social rented homes including 7 x 3 bedroom homes but requests the intermediate units are available to a range of incomes and not just aimed at those at the top of the £90,000 income cap.

It is acknowledged that the small site may well provide constraints on building footprint and viability, which could support a more flexible approach to the affordable housing tenure mix. On balance, the latest affordable housing offer is considered acceptable given the constraints of the site.

Design and Character

Policy D3 of the London Plan 2021 indicates housing developments 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. This is reinforced by policies 7.4 and 7B of the Ealing Development Management DPD (2013) require new buildings to consider the most important elements of the urban context in order to create a positive relationship with surrounding buildings and the public realm.

Paragraph 123 of the NPPF seeks to ensure that developments make optimal use of the potential of each site, while paragraph 118 supports upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene and is well designed.

A building of up to 17 storeys, with a 10 storey shoulder building, is proposed but the application site has not been specifically identified in the Ealing development plan as an area in which tall buildings would be suitable, noting the requirements of Policy D9 of the London Plan.

The GLA Stage 1 report in 2019 on the original 23 storey scheme indicated that the elevations did not currently appear to successfully mitigate the impact of a proposed development on this scale, and the development would appear as a single large building with long floorplates. The suggested approach of varying colours and materials was not considered sufficient to articulate the significant mass of the proposed building. However, the scheme has changed significantly since then.

That scheme was also subject to review by the Ealing Design Review Panel (DRP) on two occasions, the last in October 2021 which commented on a scheme similar to that in this revised application. The main comments of the Panel were:

- development of the building proportions, relationship between the higher and lower blocks, and symmetrical articulation were seen as positive changes, with articulation particularly improved, and the depth of elevation, crown and cruciform plan adding to the scheme;

- some tension remains between the two blocks and should consider options for these to be more distinct, complementary forms;

- the scheme still has a relatively high proportion of single aspect one-bed and studio units and should explore introducing more larger units to help provide more dual aspect homes;

- the reduction in units per core, shortened corridor lengths and improved proportion of dual aspect flats were seen as positive enhancements to the design;

- the industrial units are quite small and awkward in plan with consideration given to their flexibility and viability as well as their impact on the active frontage to Stanley Road;

- should explore ways to enhance the relationship of the ground floor uses with the public realm;

- the functionality of the service yard and undercroft at the rear was questioned and the potential for conflict between different users and the management of this space need to be addressed, including the relationship between pedestrian and vehicular movement in this area;

- access and the relationship of the rooftop spaces to the internal spaces should be considered further, particularly in relation to the circulation cores, common areas and individual homes;

- further clarity needed on the layout of the roof terraces to better understand their usability as well as practicalities of access and safety, the approach to balustrade/guarding design and usability;

- the adequacy of play-space provision was questioned given the density of the scheme;

- concerns were raised about the green screen alongside the allotment boundary and implications for maintenance, access and design of supporting systems need to be addressed;

- the scheme could be improved by an enhanced connection to the allotments, and the internal arrangement of spaces, as well as proximity to the boundary here, should be reconsidered;

- further development of the landscape design, street tree provision and planting choice should be considered, as well as surface treatment and opportunities for informal play at street level.

Since 2019, the main design revisions to the building can be summarised as follows:

- the taller building has been reduced by 6 storeys and the shoulder building has been reduced by a single storey;

- the building has been set further back from the eastern and western site boundaries;

- the overall massing now features greater articulation with steps in the building and roofline to add depth and with balconies provided to all flats;

- the massing has also been articulated with a large set-back in the middle in order to visually define two buildings, whilst the tall building would have a defined central bay and two shorter flanking bays to break up the longer face of the building and emphasise its vertical proportions;

- the primary material is now proposed to be high-quality brick that reflects the surrounding context with glazed terracotta to be used as an accent material on the tall building;

- the top of the building now features a ‘crown’ to finish and provide interest to the development;

- to provide better integration with the adjoining allotments, planters at the base of the tall building is proposed to provide a green backdrop to the allotments.

- the industrial use is consolidated at the base of the shoulder building and provided with large vertical openings to provide an active frontage to Stanley Road;

- creation of a party wall condition along the north west elevation to protect and facilitate the future redevelopment potential of the adjoining 44 Colville Road site;

- redesign of the northern building plan and elevations, including relocating windows and balconies to outward facing facades;

- lower level building chamfers extended across all upper floors to create corner windows that improve aspect and passive surveillance;

- minor increase in AOD levels of buildings to allow greater floor to floor heights and more generous ceiling heights for services (with overall building storey heights unchanged);

- upper levels of the southern building aligned with lower levels by extending the eastern façade 0.75m outwards (resulting in increase in overall floorspace).

The applicants also indicate the design was revised to take account of the DRP comments as follows:

- the public realm at ground floor level now provides more generous footpaths and arrival space around the building entrances and includes landscape enhancements with 15 new trees;

- green screens, formed by raised planters at ground level with stainless steel wires or mesh structure to the above balconies, are proposed to provide a more green and interesting backdrop to the allotments and soften the visual appearance of the building in that location; this would

incorporate climbing plants that are evergreen, fast-growing, low-maintenance and suitable for a partially shade Eastern aspect;

- the provision of play-space within the site will be limited to under-5s only and provided at roof terrace levels 10 and 17 due to the spatial and operational constraints of the public realm at ground level; for safety reasons, these spaces would be informal in character rather than having traditional play equipment;

- the terraces at level 17 would include moveable furniture in order to provide flexibility of use for the residents;

- the arrangement of plant has been revised to provide more generous and clear roof terraces;

- the applicants confirm that accessibility to the amenity spaces will be provided to all the housing tenures and via the two cores.

These revisions did not respond to all DRP comments and there is still a relatively high proportion of single aspect one-bed and studio units.

The design of the scheme has improved significantly following various revisions. The taller building would have a well-defined base, central element and crown. The wider elevations of the tall building would comprise three bays to break up the massing and give it a vertical emphasis. The elevations would also be broken up by projecting balconies with the central section having semi-recessed balconies to add depth to the facade. The lower building would have a similar design approach to the tall building but without a crown structure and with an increased number of vertical frame elements. It would also have different coloured materials to distinguish it from the taller building.

Figure 8: East Elevation to Stanley Road

Overall, in terms of design and general appearance, the scheme can be considered acceptable. The scale of the building is considered further below.

Materials

The main facing material would be a grey / brown multi-stock brick to reflect other brick buildings nearby. Residential entrances would have a double height metal portico and curtain wall glazing. The industrial entrance at the base of the smaller building would have large vertical openings and metal frames. The central section of the tall building would be clad in glazed Terracotta tiles with white and ivory tones. This would be generally acceptable. However, a condition requires approval of external materials.

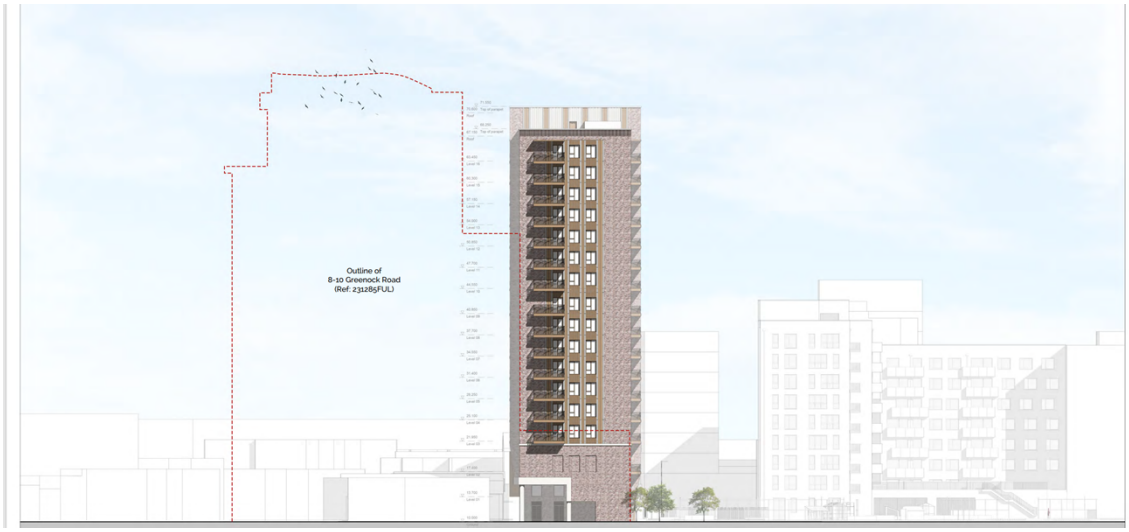


Figure 9: View from south

Scale of Buildings

London Plan Policy D9 indicates that tall buildings should be part of a plan-led approach and only be developed in locations identified as suitable in development plans, and subject to various criteria. Policy 7.7 of the Ealing DPD indicates that tall buildings should normally be located on specified sites within Acton, Ealing and Southall town centres and identified development sites, and offer an outstanding quality of design.

The proposed development of up to 17 storeys can be considered as a tall building and the site is not identified in the Ealing Development Plan as appropriate for tall buildings, nor brought forward through a plan-led approach. It is also not in the Central Activity Zone, an opportunity area, an area of intensification or a town centre. The scheme has therefore been assessed against the Policy D9 design criteria which are most relevant to this proposal:

a) **avoid harm to the significance of heritage assets and their setting:** the proposed building is not in a conservation area and would not lie close to any heritage assets and the submitted Heritage Assessment indicates that the proposed development would cause no harm to the World Heritage Site or its significance; it also concludes there would be no harmful effect on the setting of any heritage asset in the surrounding area including conservation areas, listed buildings, and registered parks and gardens;

b) **in long-range views ensure careful design of the top of the building, contribute positively to the existing and emerging skyline and not adversely affect local or strategic views**: following revisions, the top of the building is considered well designed; based on the submitted visual impact assessment, it is not considered that it would adversely affect local or strategic views and would be seen in the context of other tall buildings approved nearby;

c) **in mid-range views from the surrounding neighbourhood make a positive contribution to the local townscape in terms of legibility, proportions and materiality**: the proposed building would appear fairly large and dominating in some mid-range views but would be seen in the context of the 10 storey Ravenswood Court nearby and is improved by design changes such as brick facades to reflect local context and recesses in the massing and roofline to give a more elegant and vertical appearance;

d) **individually or as a group, to reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding**: the applicant argues that a tall building on this site would create a sense of arrival at South Acton station, mark the southern tip of the Acton Gardens masterplan and form a connection between Stanley Road and the emerging neighbourhood of taller buildings along Bollo Lane to the west.

e) **architectural quality and materials to be of an exemplary standard**: the architectural quality of the building is considered to be of a reasonable standard and it would make a contribution to the local townscape; the Ealing Design Review Panel noted positive changes to building proportions, relationship between the higher and lower blocks, and articulation although with some areas of improvement indicated;

f) **the base of the building to have a direct relationship with the street, maintaining its pedestrian scale, character and vitality:** the base of the building facing Stanley Road would contain two double height entrances to the flats to create a sense of arrival while the pedestrian entrance to the industrial uses would also be from Stanley Road; this would be supplemented by landscaping and public realm improvements on Stanley Road and should create a reasonable relationship with the street.

g) **Where the edges of the site are adjacent to open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy**: it is not clear that there is a transition in scale to the adjoining allotments although a green wall is proposed to soften this edge;

h) **not cause adverse reflected glare and minimise light pollution from internal and external lighting:** the proposed materials of brick to most of the elevations along with glazed terracotta are not considered likely to cause adverse reflective glare and no objections have been raised on this point; external lighting within the service yard will be contained by the covered undercroft area while the roof terrace amenity spaces will feature low level lighting.

i) **noise, wind, daylight, sunlight penetration and temperature conditions around the building not to compromise enjoyment of open spaces around the building**: in this regard, the submitted wind report indicates that various wind mitigation measures are incorporated in the scheme and that long term wind comfort conditions will be suitable for the intended use for all thoroughfares, existing building entrances, proposed building entrances, station platforms, allotment spaces, proposed amenity terraces and proposed balconies; with regard to the nearby allotments, the submitted overshadowing information indicates that these would still receive adequate sunlight hours for growing purposes;

j) **internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants:** a Fire Statement accompanies the application relating to the revised layout, emergency access and escape routes and facade/materials proposals and a condition will ensure implementation to accord with this.

k) **must demonstrate that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport:** the Council's transport section consider the proposal will be acceptable in terms on impacts on the transport network with the required S106 contributions to infrastructure;

l) **jobs, services, facilities and economic activity provided by the development should inform the design so it maximises the benefits these could bring to the area:** the proposal would provide a net increase of 859 sq m of modern industrial floorspace suitable for small businesses and would support 20 FTE jobs; this space has been designed to form an active frontage on the bottom two floors of the building;

m) **proposals for tall buildings should positively contribute to the character of the area:** it is suggested that the proposed building would provide a marker for South Acton station, mark the end of a southern vista through Acton Gardens and that the active ground floor uses and public realm enhancements would transform the route into an attractive space connecting the light industrial estate and Acton Gardens.

The proposals have also been considered in the context of the Ealing Housing Design Guidance (January 2022) which sets out various guidelines for developments including tall buildings. Many of these mirror the criteria in London Plan Policy D9. While the evolution and submission of the application pre-dated this Guidance, the proposals accord with some of the Guidance principles, including undergoing two rounds of design review by an independent panel and being subject to visual impact testing and 3D modeling of nearby, mid-range and long distance views.

However, it does not appear to comply with others such as being part of a larger site over 0.25 ha and not obviously considering lower/medium rise forms of development, which may however reflect viability concerns on such a small site. Despite the many objections, it is not clear that the scheme would fail to accord with aims to avoid diminishing the quality and amenity of adjacent buildings and outdoor spaces including overshadowing.

In addition, the proposed 17 storey building would exceed the maximum height of 15 storeys identified for this part of the South Acton Masterplan area. However, as noted above, the industrial intensification and public benefits of the proposal can be considered to justify an exception to this target.

On this basis, the proposed tall building would accord with many, if not all, of the London Plan Policy D9 and Ealing design guidance criteria.

Scale within the Wider Context
Consideration of the scale of this development also needs to take account of the emerging townscape in the surrounding area. This needs to consider the context of the Acton Gardens masterplan for this area as well as the various tall, new buildings recently approved nearby.

The masterplan area for Acton Gardens (formerly the South Acton estate) lies roughly between Acton High Street in the north, Bollo Lane in the west, the railway line to the east and South Acton station to the south. It originally consisted of a large council estate of medium to high rise residential blocks of up to 17 storeys built between the 1950s and 1970s.The masterplan for regeneration of the estate involved a 15-year programme over a number of phases, including 2,500 new homes, over half of them affordable, and with an overall vision to reconnect the estate to the wider neighbourhood and to create a pedestrian-friendly environment with a sense of place, and safety and security for its residents.

The 2012 masterplan for the area was largely based on mid-rise development of 6 to 9 storeys. This covers an area broadly to to the north and east of the application site.

The 2018 Masterplan and outline permission for the remaining phases introduced additional height to optimize housing capacity while respecting context and surrounding streetscape. It allowed for several 12 storey buildings and one of 20 storeys adjacent to Avenue Park at the centre of the site. The strategy was to locate taller buildings toward the centre of the site to allow for building heights to gradually fall to typical 1-3-storeys in height around the site boundaries. The taller buildings were located at key nodes to flank open spaces and contribute to their setting. This built form was to contribute to wayfinding around the neighbourhood, provide positive reference points and a sense of enclosure. Taller buildings were also positioned away from the lower buildings in the Mill Hill Park Conservation Area and from high points of the area, where lower to mid-height development was proposed.

In this broader Acton Gardens context, the proposed tall building would be located beside an area of open land – the allotments. However, the GLA Stage 1 report noted that whilst there is some logic to placing tall buildings next to public/open spaces of size, the subject allotment does not fall into this category.

The applicants suggest the proposed building would provide a marker for South Acton station, mark the southern tip of the Acton Gardens masterplan and provide a connection between Stanley Road and the emerging neighbourhood to the west. They say the application site borders the only connection between the light industrial estate and Acton Gardens, currently an uninviting and unwelcoming pedestrian footpath running to the north of the site, and that active ground floor uses and public realm enhancements along Stanley Road would transform the route into an attractive space connecting neighbourhoods together.

However, objectors to previous versions of the scheme argued that the proposal did not make a positive or an appropriate contribution to the local context of the Acton Gardens development, which consists of well-lit, well-spaced, predominantly mid-rise buildings. They also note that the proposed building is not in line with the Acton Gardens Master Plan which aimed to deliver quality medium rise housing and sought a reduced building height towards the southern border of the Southfield Ward adjoining 2 storey houses. This visual impact would be exacerbated by the application site being 5m higher than the southern 2 storey neighbourhood. It is further argued that any new building should ‘complement rather than compete with its existing surroundings but this proposed development would compete with Ravenswood Court and Welbeck Court, which are currently the tallest buildings in the area with the other blocks nearby all lower. They assert that these elements of the Acton Gardens regeneration were carefully sited, designed with a U shaped layout to the south and limited in height to protect the allotments from loss of light and be less dominant in relation to the 2 storey houses to the south; the proposed building would ignore these factors.

Account also needs to be taken of a number of recently approved (some awaiting S106 Agreements) tall developments in the general area including:

- **TfL land at Bollo Lane**: up to 25 storeys of business floorspace, flexible commercial uses, and 200 dwellings;

- **TfL land at Bollo Lane**: 8 blocks of 8 - 18 storeys for business uses, flexible commercial space, and up to 700 dwellings;

- **29-39 Stirling Road / 2-10 Roslin Road:** two buildings of 15 storeys and up to 11 storeys of mixed-use development and 149 flats;

- **3-15 Stirling Road:** two blocks of up to 10 and 14 storeys in industrial-led, mixed used development with 88 flats on upper floors;
- **1 Stirling Road / 1-9 Colville Road and 67-81 Stirling Road:** two buildings of 11 and 20 storeys for mixed use development of commercial floorspace and 237 flats;
- **93 Bollo Lane:** up to 11 storeys mixed use scheme with 96 flats and light industrial floorspace;
- **100 Bollo Lane:** 3-14 storeys of mixed use development with 112 flats and business floor space.

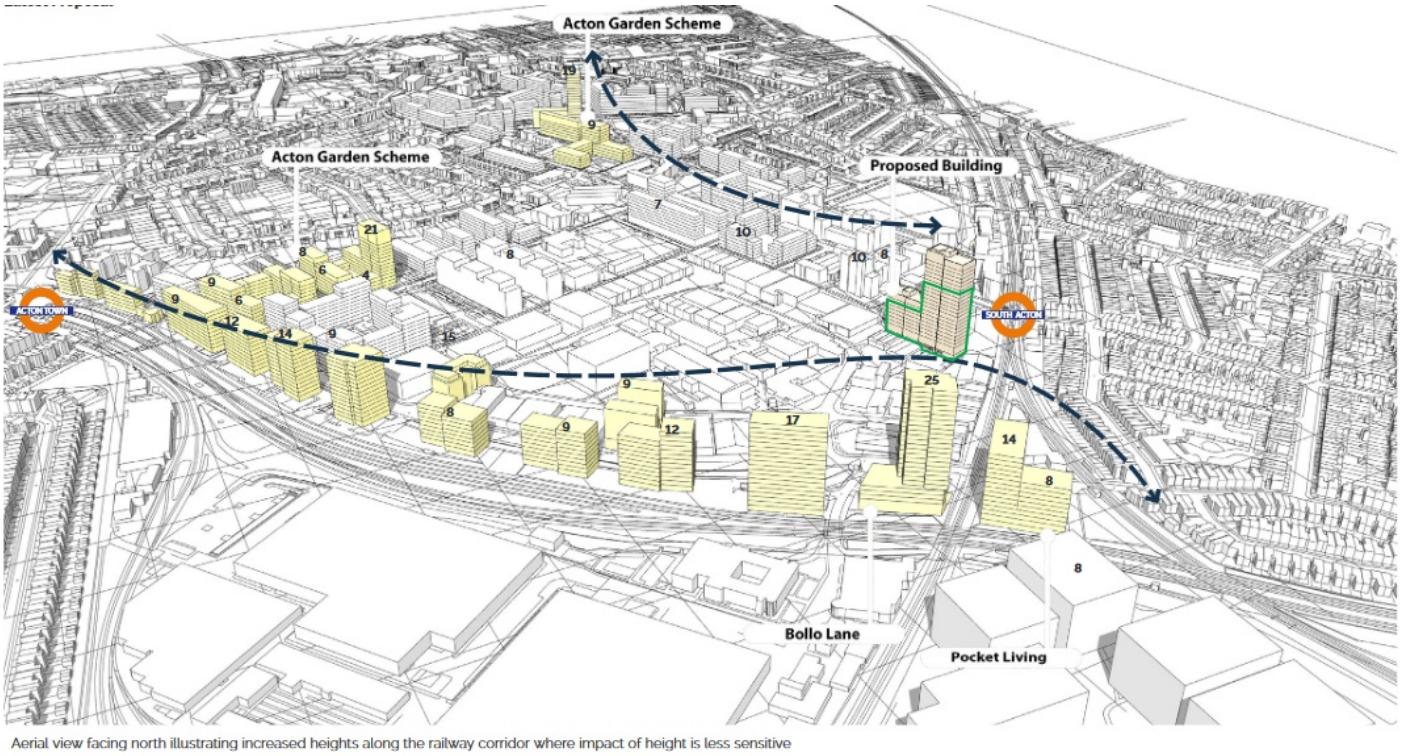


Figure 10: Approved/ proposed schemes in South Acton

These developments largely lie to the west and south-west of the application site and within 150-200m of it as shown on the diagram above. Many are concentrated along Bollo Lane with this area and the industrial estate to the west of the application site undergoing significant change with increases in building height.

The applicants argue that a tall building on the application site could form a connection between Stanley Road and the emerging neighbourhood of taller buildings along Bollo Lane to the west. The height of the shoulder element would relate to the scale across the road at Ravenswood Court with the taller element responding to the emerging tall buildings to the west within the South Acton industrial estate. They also argue this will create a new landmark building for South Acton Station, and reflect the form and scale of the emerging built environment in the surrounding area, including the TfL development on Bollo Lane. It is also asserted that the proposed building would be subservient to the 25 storey tower on the TfL site, with a lower overall height and a slimmer profile.

Objectors argue, however, that the TFL development and others along Bollo Lane are some distance away from this site and largely within their own distinct corridor unrelated to the application site. They

assert these schemes have significantly more space between buildings and provide significantly more outside amenity space and improvements to the public realm for residents and the existing community. They also note that the 100 Bollo Lane development has part of the building set back and substantially reduced in height towards the south.

Overall, the proposed building would not appear to accord particularly well with the aims of the Acton Gardens Master Plan. The site is significantly separated from the Bollo Lane corridor and its potential role as a connection between taller buildings further north in the Acton Gardens area is not particularly obvious. It can, however, be argued the proposed building would reflect a changing townscape picture in the wider area of South Acton where taller buildings are becoming more prevalent and this is recognised by the more recent South Acton Industrial Masterplan.

Visual Impact
London Plan Policy D9 requires tall buildings to be assessed in terms of their visual impact within long-range, mid-range and immediate views. A Townscape and Visual Impact Appraisal accompanies the application.

By way of context, the South Acton Industrial Estate to the north-west of the site includes small to medium sized units of one to three storeys in height. The area to the east and north-east has been redeveloped as part of the Acton Gardens regeneration, which includes the 10 storey apartment block Ravenswood Court and Welbeck Court.

Figure 11: View looking south along Stanley Road

The Townscape and Visual Impact Appraisal notes that existing views of the site are largely restricted to its immediate context due to the surrounding built form and limited structures within the site itself. It identifies 10 representative viewpoints from which the proposed scheme would be visible and assesses the impacts on views from these points. These viewpoints are:

1- South Acton Park,
2- Kingswood Road,
3- Bollo Bridge Road,
4- Whelan Road,
5- Bollo Lane – junction with Colville Road,
6- Bollo Lane – level crossing,

7- Cunnington Street,
8- Acton Green Common,
9- Gunnersbury Park,
10- Gunnersbury Cemetery.

The Appraisal considers that the proposed building would improve the townscape situation of the townscape character area within which the site lies, which is characterised as “industrial and railway infrastructure” with a low townscape value. This is because the proposal would remove a low quality building and replace it with a building of higher quality. It would also provide an active frontage to Stanley Road and the public right of way that links it to Greenock Lane, which is considered to improve the street scene and provide natural surveillance onto the surrounding streets.

It concludes that the proposed development would lead to the following residual, direct, permanent effects on the representative views as follows:

• Moderate and beneficial effect - representative views 5 and 6
• Moderate to minor and beneficial effect - representative views 2 and 7
• Minor and beneficial effect - representative views 3 and 4
• Minor and neutral effect - representative views 9 and 10
• No effect- representative views 1 and 8

It also notes that emerging schemes along Bollo Lane and nearby would be visible from most of these representative views and will reduce the visual effect of the proposal on some of the views.

The Appraisal concludes that the development would provide a new feature within views from the surrounding visual receptors that is not uncharacteristic of the townscape of South Acton, that its varied building form means that it would be perceived as two buildings, helping to break up its overall mass within views and that it would visually improve the townscape around South Acton station.

Heritage Impacts

London Plan Policy HC1 requires development proposals that affect heritage assets and their settings to ‘conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings’. London Plan Policy HC2 further states that development, in World Heritage Sites and their settings should conserve, promote and enhance their Outstanding Universal Value.

A Heritage Assessment accompanies the application. This notes that there are no heritage assets on the site and it does not lie within or adjoin a conservation area. While there are a number of heritage assets in the wider area around the site, most are over 500m away. These include parts of the Mill Hill, Gunnersbury, Acton Green and Thorney Hedge conservation areas. The nearest listed building is the Grade II listed Bollo Lane Junction Signal Box some 250m to the south. The Kew Gardens World Heritage Site lies 3km to the south-west. The Grade II* Gunnersbury Park and Gardens of Special Historic Interest lies some 750m to the east.

Kew Gardens objected to the original application on the grounds of potential visual impacts on the World Heritage Site since no verified views had been assessed from within Kew Gardens and views from the Great Lawn, to the south-west of the Orangery, and from the Temple of Aeolus should be assessed. It has not commented on the revised proposals.

The GLA Stage 1 report on the original scheme noted that the location and significant height of the proposed building had potential to cause adverse impacts on the view, context and setting of items of heritage significance including Chiswick Park, Kew Gardens (World Heritage Site) and Gunnersbury

Park and that the impacts on these key heritage assets had not been dealt with in the submitted documents.

The latest Heritage Assessment assesses these views but concludes that the magnitude of change to the World Heritage Site would be negligible, and the proposed development would have a minor neutral effect with no harm to the World Heritage Site or any effect on any element of its setting that contributes to its significance. This is because the proposal would not be visible from Broad Walk, Kew Gardens and therefore represents no harm to this view. From the Temple of Aeolus, the proposal would be visible above the horizon but would sit to the left of the axial view and would be partially covered by tree planting in the mid distance and joined by the approved massing of the TfL Bollo Lane scheme.

With regard to other heritage assets, the Heritage Assessment concludes that:

- there would be a minor to moderate effect on the setting of three listed buildings / listed building groups - Chiswick Park and Acton Town underground stations and the Gunnersbury Park grade II group - and a moderate effect on the Gunnersbury Park grade II* group. In all cases the effect would be neutral and would not harm any element of setting that contributes to their significance.

- the effect on the nearest conservation areas would range from negligible to minor to moderate, with a minor to moderate effect on the Gunnersbury Conservation Area in the London Borough of Hounslow.

- with regard to registered parks and gardens, there would be a negligible and neutral effect on the Chiswick House Park and Garden and a minor to moderate and neutral effect on Gunnersbury Park.
- with regard to locally listed buildings, there would be a minor and neutral effect on the locally listed Frank Pick House and negligible effects on others.

The overall conclusion is that there would be no harmful effect on the setting of any heritage asset in the surrounding area of the application site. There is no obvious reason to dispute this finding.

Overlooking and Overbearing Impacts on nearby Dwellings

The proposed scheme needs to be assessed in terms of any impacts on the amenity of both nearby residential properties and future occupiers within the development itself, by ensuring good levels of visual outlook and privacy, as required by Policy 7B of the Ealing Development Management Development Plan Document (2013) and London Plan Policy D6.

To the north of the site are industrial buildings, used as laundry, equivalent to 2 storeys in height but with no facing windows and with a separation distance of 18m. No significant adverse impacts on amenity would be expected to arise here.

Immediately to the west lie various industrial buildings of 1-2 storeys and fronting on to Colville Road. These would be separated from the proposed development by just over 3m. These buildings do not appear to have any facing windows and it appears unlikely that significant impacts on their amenity would arise.

To the south and south-west are other industrial buildings of 1-3 storeys in height and fronting on to Greenock Road. These would be separated from the proposed development by 4m to the south and 6m to the south-east. The southern industrial units have a vehicle loading bay facing the application site. The industrial units to the south-east do have windows in their facing elevation but given the

industrial nature of their operations, it appears unlikely that unacceptable impacts on their amenity would arise here.

However, there is now a planning application on 8-10 Greenock Road immediately to the south of the site. This proposes an 18 storey building with flats above ground floor industrial and café space. On the lower floors, the separation distance between the buildings would be 9m but these would be industrial units so no daylight or overlooking issues arise. On the upper floors, residential windows in the adjoining Greenock Road development would be separated from this scheme by some 21m. Moreover, windows/balconies in the adjoining schemes would not be facing each other and would be at an acute angle to each other. No overlooking appears likely here.

To the south-east is an area of allotments adjoining the railway line. The proposed development would appear to come within 1m or so of the western edge of these allotments. While no issues of residential amenity arise here, the various other potential impacts on the allotments are considered separately below.

The closest existing residential properties are the dwellings in Ravenswood Court lying immediately to the east of the site across Stanley Road. This is a 9 storey block of flats, which has windows and balconies facing the application site.

There are a large number of objections from local residents on the grounds of adverse impacts on light, overshadowing of nearby dwellings/amenity areas and overlooking of some windows from the proposed high building. Many of these are from residents of Ravenswood Court but also from Welbeck Court, Acacia Court and Reade Court, blocks of flats adjoining it.

In the revised scheme it would now be separated from the proposed development by some 18.7m. The applicants also note that the number of flats proposed along the eastern side of the development has also been reduced. This separation distance would normally be considered acceptable to prevent unacceptable overlooking.

Balconies are proposed in the western elevation of the new development and these would face existing balconies in Ravenswood Court. These are projecting balconies which would reduce the effective separation distance between them to 17.3m. While the resultant separation distance is marginally below the 18m ideally sought, facing balconies across a street with lower separation distances are found in other parts of Ealing. In addition, screens are proposed to the new balconies and combined with the separation distance, on balance, these should adequately mitigate unacceptable overlooking.

However, a 17 storey building this close to existing windows could be considered to have an overbearing effect on outlook from some Ravenswood Court flats. Many of these are single aspect dwellings which only face west and their windows and the outlook and only view from their balconies would be obstructed by the proposed 17 storey building. A point made by objectors is that the applicant emphasises the excellent views to be obtained from the west-facing flats of the proposed development, but these would be achieved by removing similar existing views from residents of Ravenswood and Welbeck Court.

While there will clearly be some adverse impacts on the outlook of some existing single aspect flats in Ravenswood Court, on balance, it is not considered the proposal would result in unacceptable overlooking to adjoining residential or industrial properties.

Impacts on Daylight

With regard to impacts on light, Policy D6 of the London Plan indicates that buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, with regard to overshadowing.

There have been a large number of objections from local residents on the grounds of adverse impacts on light and overshadowing of nearby dwellings/amenity areas as a result of the proposed high building. These come particularly from residents of Ravenswood Court, Welbeck Court and Acacia Court, which lie just across Stanley Road from the development.

A Daylight/Sunlight assessment of impacts on neighbouring properties accompanies the application and assessed daylight and sunlight effects on 17 neighbouring buildings which were considered close enough to be relevant for daylight and sunlight assessment. This used the Vertical Sky Component (VSC) and No Sky Line (NSL) tests indicated by BRE Guidance. The Vertical Sky Component (VSC) test was first applied. This measures the amount of sky visible at a specific point on the window, reflecting the amount of daylight received. If windows achieve a VSC below 27% and have existing levels of sky visibility reduced to less than 0.8 times their former value, there would be a 'noticeable' impact to daylight.

However, the VSC test does not indicate the daylight distribution within the room. This is assessed using the No-Sky Line (NSL) test, which can be applied to rooms which fail the VSC test to check that overall daylight is adequate. A 'noticeable' impact to daylight occurs when levels of NSL within rooms are reduced to less than 0.8 times their former value.

On this basis, the assessment found that the following 8 properties would be fully compliant with BRE recommendations for daylight and would therefore not experience significant impacts: Nos. 2 -6, 10, 14, 20, 24 and 28 Weston Road.

The remaining 9 properties were assessed to experience changes to their levels of daylight and sunlight: 57 -59 Kingswood Road, Nos. 8, 12, 16, 18, 22 and 26 Weston Road and flats in 1-26 Ravenswood Court. The losses of daylight were assessed as more than the 20% recommended by BRE Guidance.

For these terraced houses along Weston Road and Kingswood Road, the reductions in light based on the VSC and NSL tests were assessed as minor and unlikely to significantly affect the tested rooms. Most of the windows were assessed as being compliant with BRE targets. Only one window, mainly at ground level, in most of these dwellings would be affected and in each case the impact was assessed as minimal. It was concluded that there would be no noticeable loss of light within these dwellings.

For Ravenswood Court, due to the largely underdeveloped nature of the application site, the assessment considered it appropriate to use an alternative 'mirror massing' baseline, as opposed to comparing light levels as existing with those after the proposed development. This approach is suggested by BRE for situations where new development would be close to an existing higher building and assumes it would not be unreasonable to develop an adjoining site to at least match the height of the existing building opposite it. Using this approach, it concluded there would be changes to daylight and sunlight for a number of rooms within Ravenswood Court (including Welbeck Court).

A total of 72 rooms, served by 117 windows, were assessed for potential alterations in daylight. Of these, 50 rooms were found to be fully BRE compliant for both the VSC and NSL measures. Of the total 22 affected rooms, one is an open-plan living/kitchen/dining room, three are living rooms and 18

are bedrooms. It notes that the majority of these would be bedrooms located opposite the proposed development site and considers this type of room less sensitive to daylight losses.

The only combined living, kitchen and dining space affected is indicated to be a room at ground floor level. However, this is a dual aspect room and only the windows facing the proposed development would experience a reduction in VSC levels. In addition, the assessment indicates the NSL level within this room would remain very good (99%) and therefore the overall daylight alterations to it were considered minimal and acceptable.

The assessment also indicates that three living rooms in Ravenswood Court, on the 7th and 8th floors facing the proposed development, would experience reductions in levels of daylight and sunlight. However, it indicates that most of these living rooms already experience low levels of light under the VSC, NSL and PSH tests due to the presence of inset balconies. While some other lower facing windows would also have a reduction in light, these serve dual aspect rooms with side windows so that overall light in the room is considered adequate.

Of the 18 bedrooms which would have a daylight reduction (on the VSC test), the assessment indicates 8 would be dual aspect bedrooms and these would also have secondary windows not facing the application site. In addition, it notes they all meet the BRE criteria for the NSL test and therefore the daylight effects experienced by these 8 bedrooms as a result of the proposed development were considered only minimal and overall acceptable.

The remaining 10 bedrooms affected have a single window facing the proposed development and would see a reduction in their daylight levels on both VSC and NSL measures. These rooms are on the first to 10th floors and directly opposite the proposed development. To test whether the daylight quality of these bedrooms would be meaningfully altered as a result of the proposed development, a supplementary daylight assessment (Average Daylight Factor) was undertaken. The recommended ADF levels for bedrooms is 1%. This further assessment found that, on this measure, the retained daylight levels would be in line with BRE guidance for all of the affected 18 bedrooms. On this basis, the assessment concludes that the daylight reductions on the VSC and NSL tests indicated above are considered minor and these bedrooms would remain adequately provided with daylight.

Overall, the assessment concludes that daylight and sunlight effects upon the existing neighbouring properties can be considered acceptable and in line with the flexibility allowed for within the BRE guidance and the London Plan Housing SPG.

A separate Daylight Assessment has been provided to assess daylight impacts on the proposed development at 8-10 Greenock Road using the spatial Daylight Autonomy (sDA) method as set out in the latest BRE Guidance. This indicates that 97% of the 345 rooms would meet relevant sDA recommendations with the Stanley Road development in place. The 11 rooms falling short are 9 living/kitchen/ dining rooms (LKDs) and 2 bedrooms. These rooms fall just marginally short of the recommended levels and all combined LKDs achieve at least the minimum recommendation for living areas so are considered well daylit for their primary function as living spaces. Overall, this assessment concluded that the Stanley Road development would not materially affect the daylight quality of the proposed residential accommodation at 8-10 Greenock Road.

With regard to sunlight, all living rooms facing within 90 degrees of due south had their windows tested for sunlight. The nearby dwellings on Weston Road and Kingwood Road to the south of the proposed development would experience no sunlight impacts. Within Ravenswood Court, 24 out of the 25 assessed living rooms were assessed as fully compliant with BRE guidance. The one room which failed this test is on the 8th floor but is located behind a balcony which obstructs most of the direct

sunlight reaching the inset window and the baseline sunlight level is already below the BRE recommendation.

An objection from local residents asserts that the applicant's Daylight/Sunlight Assessment should not be accepted as it contains omissions, incorrect room classifications causing false conclusions and confirmation bias with regard to selected measures and misleading language. These objection points and the applicants' response to them are set out below:

- the assessment omits an entire block of flats (Welbeck Court) approximately 20m away: the applicants respond that Welbeck Court was not omitted but assessed as part of Ravenswood Court and the results are provided in the report; this is correct;

- the assessment states that most rooms facing the new development are bedrooms which is incorrect since 1/3 of the rooms are living rooms/kitchens and 1/3 are combined bedroom/office-studies: the applicants responded that the approved plans for the existing building do not indicate the bedrooms for use as office-studies; on that basis, 22% of the rooms assessed are living rooms, 13% are dual-aspect Living/Kitchen/Diners and 65% are bedrooms; of the 22 rooms where daylight is affected when compared to the mirror-massing baseline, 4 are living spaces and 18 (82%) are bedrooms, so it is correct that most of the affected rooms are bedrooms;

- the assessment claims that some facing rooms are already below required light levels due to inset balconies but this is not the case according to planning documents for Acton Gardens Phase 3.1 which indicates daylight levels are well above the required standard: the applicants responded that their own assessment of existing conditions for these flats found that current VSC levels for the living rooms behind inset balconies range from 17.0% at 1st floor to 17.9% at 8th floor, which is significantly below the BRE criteria of 27% despite an unobstructed outlook, so that the current low levels of daylight are a function of the inset balconies.

- the assessment supports this claim of minimal daylight impact by misclassifying rooms and assuming existing reduced light levels, all based on only a desk top study and clearly without having established the true room classifications of the existing Phase 3.1: the applicants responded that a highly detailed 3D computer model of Ravenswood/Welbeck Court was created from the most accurate information available in the public domain, namely detailed plans, sections and elevations submitted to support the Reserved Matters Application for Acton Gardens Phase 3.1 and downloaded from the Ealing Council planning portal; they note that this method for assigning room uses is industry standard practice for daylight and sunlight assessments accompanying planning applications; they also reject any misclassification of rooms for the reasons indicated above.

- the objectors carried out a basic analysis of a representative 1-bed flat in Ravenswood Court floor 5 and the estimated values and daylight impact [of the proposal] all fall severely sort of required BRE standards: the applicants responded that there were a number of fundamental errors in the objector's calculation;

- the objectors note that documents for the proposed development indicate the west-facing apartments in it will have the benefit of direct sunlight from afternoon onwards but do not mention that this direct sunlight will be removed from the residents of Welbeck Court and Ravenswood Court which have west facing balconies: the original Daylight/Sunlight Assessment did not assess such overshadowing impacts on adjoining balconies, only on the allotments; the applicants acknowledged that, given the westerly orientation of the facade and the balconies' current outlook over an existing underutilised site, it was inevitable that a reduction in sunlight to these balconies would occur. However, an Overshadowing Assessment was subsequently carried out for the 8

west facing balconies in Ravenswood Court and this indicates that on 21st March, all 8 balconies would receive full sunlight until 13:00; on 21st June all 8 balconies would receive full sunlight until 15:00 when 1 balcony would be in shade with 6 balconies in shade by 17:00 but full sunlight would then be received by all balconies from 19:00 onwards.

Objectors also requested the Council commission an independent daylight/sunlight assessment of the scheme. However, it was considered that there was sufficient internal expertise available in this field for planning officers to review the applicant's assessment adequately, and this was done.

On balance, based on the BRE guidance and having considered the points made by objectors, the proposal is not considered to have unacceptable impacts on the daylight of nearby properties to a level that would justify refusal. It would appear to have some impact on sunlight to adjoining balconies in Ravenswood Court but again it is not clear that this impact would be sufficient to justify refusal.

Impact on Allotments

London Plan Policy G1 aims to protect and enhance London's network of green and open spaces, and green features in the built environment and accompanying text emphasises the objectives of promoting mental and physical health and wellbeing and…supporting food growing.

The South Acton Allotment Gardens Society has objected to the revised proposals on the basis that the proposed building would cause a significant loss of sunlight to much of the South Acton Allotment west site. They emphasise that the BRE Guidance is not a horticultural standard for cultivation of vegetables and fruit, especially during the growing season from March to October. They also note that there would be increased shading from 14:00 until sunset for up to 90% of the plots in Summer, as indicated by the Daylight/ Sunlight Impact Study pages 72-87 and 82-83, and that this assessment does not cover the period beyond 15:00 in Winter or accurately reflect the degree of shadowing.

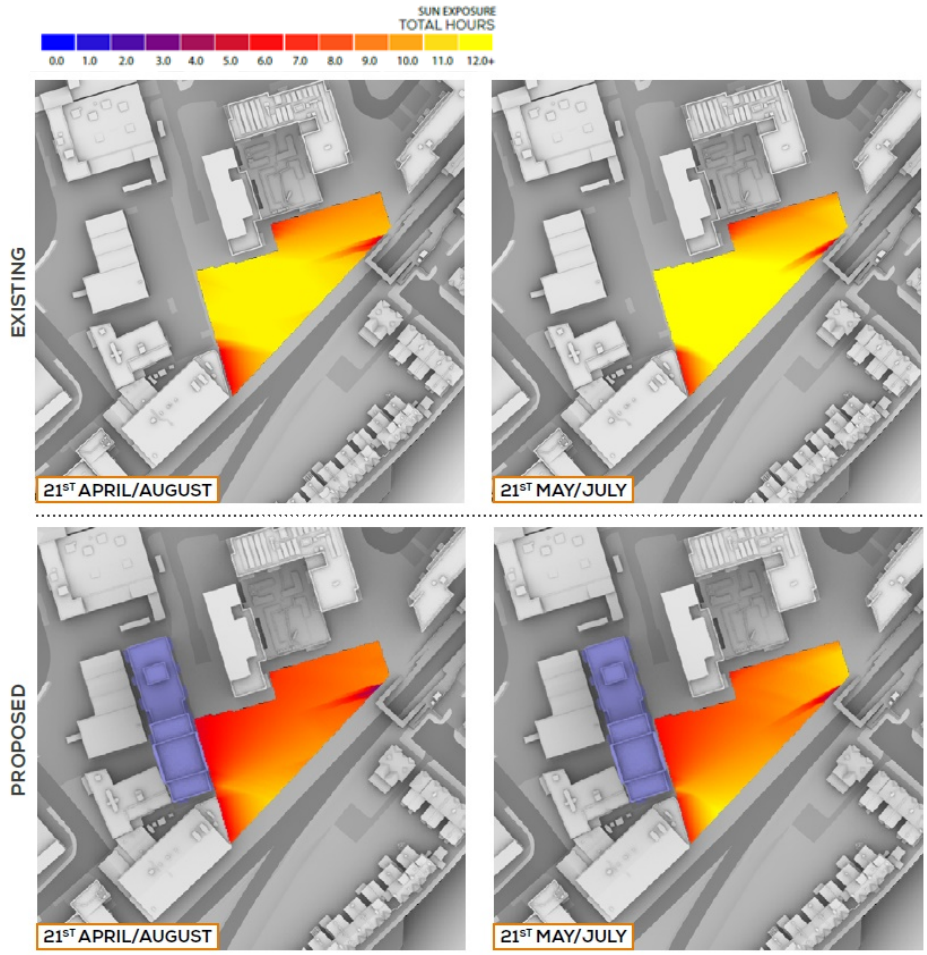
The South Acton Allotment Gardeners Society objects to the proposal and asserts that it will cause:

- significant loss of sunlight to much of the South Acton Allotment west site;
- the BRE standard is not a horticultural standard for cultivation of vegetables and fruit during the growing season;
- increased shading from 14:00 until sunset for up to 90% of the allotment plots in summer; and the overshadowing report does not cover the period beyond 15:00 in winter or accurately reflect the degree of shadowing.

The applicants do not accept the objector's assertion that the assessment does not accurately reflect the degree of shadowing, arguing that the assessment provided is accurate and goes above and beyond the standard overshadowing assessments suggested by the BRE guidance.

The applicants' response is that, while there will be an increase in shading from 14:00 in summer, the table below provides a summary of the area of shading between 14:00 and sunset on the summer solstice. This indicates that parts of the allotments are already shaded by surrounding buildings although it is clear that the proposal will significantly increase the area overshadowed.

Time on 21 June	% of Allotments shaded by Existing Surroundings	% of Allotments shaded by Proposed Development	Total % of allotments shaded
14:00	6%	10%	16%
15:00	10%	25%	35%
16:00	22%	48%	71%
17:00	30%	62%	91%
18:00	42%	56%	97%



Overshadowing of Allotments

The applicants also assert that shading of the allotments in the afternoons is unavoidable if the application site is to be developed, because even a modest 5 storey building on it would result in a similar degree of shading. In this context, the submitted Daylight/Sunlight assessment contains an overshadowing assessment for the allotments area. This examines shadowing patterns on an hourly and monthly basis. These assessments indicate that, although minor additional shadows would be cast by the proposed development upon a small north-western portion of the allotments area, the sunlight exposure would still remain very similar and good throughout the year.

It also notes that the majority of shadow cast upon the allotments during the growing season would result from the first 5 storeys of the proposed development, so that any increase in massing within the

development site would see overshadowing of this magnitude when compared to the existing underdeveloped site. It further notes that daily cumulative studies undertaken on the 21st of each month from March to September (the growing season) demonstrate that the vast majority of the allotments area would receive a minimum of 6 hours of sun daily, weather permitting, for the majority of the growing season.

Additionally, the applicants indicate that their review of the impact the nearby Acton Gardens developments have had upon the Jerome Tower Allotments on the corner of Enfield Road and Osborne Road shows that the retained levels of sunlight within the South Acton allotments would exceed those of the Jerome Allotments.

Part of the South Acton Allotment Gardeners Society objection is that the BRE standard is not a horticultural standard for cultivation of vegetables and fruit during the growing season. In this context, the Royal Horticultural Society identifies required growing conditions for fruit and vegetables based on the number of sunlight hours received by allotments. This indicates that most common fruit and vegetables require Full Sun although about half can manage with Partial Shade. Full Sun is defined as more than 6 hours of direct sun per day at midsummer and Partial or Semi Shade as 3-6 hours of direct sun per day at midsummer.

Further analysis provided by the applicant indicates the number of sunlight hours received by the allotments with and without the proposed development. Without the proposed development, approximately two thirds of the allotments area receives over 12 hours of sunlight between 21 May-21 July, with the remainder receiving 7-11 hours per day. With the proposed development in place, for the same period, this would change to something like 95% of the allotments area receiving 7-11 hours of sunlight per day and only 5% receiving over 12 hours per day. While this would be a significant change, all of the allotments area would still receive more than adequate sunlight for horticulture based on the Royal Horticultural Society definition above.

The South Acton Allotment Gardeners Society also objects on the basis of wind tunnel effects on the allotments arguing that the development will create new canyoning and vortex effects, greatly increasing the adverse 'wind tunnel' effects, which are not conducive to gardening. It also indicates that the distance between the eastern façade of the building and the allotment site is only 1.5m and removal of the existing slatted concrete wall on the western boundary of the allotment site will increase the prospect of damaging wind effects at the site. It further notes that the submitted wind reports are based on limited wind tunnel tests and conjecture formulated at ‘workshops’ and are insufficient to give assurance that wind effects will be limited.

The submitted Wind Assessment report does not specifically assess impacts on the allotments. It only notes that the allotments to the south-east of the proposed development would be suitable for sitting and standing use during the summer season, one category calmer than the existing baseline scenario.

However, further submissions by the applicants indicate that wind tunnelling is not expected in the allotments area as a result of the proposed development. The analysis in the submitted Wind Microclimate Report shows the wind conditions, with mitigation measures, would be suitable for standing use on the allotments. This also shows that the proposed development would provide an element of shelter to the allotments from prevailing winds compared to the existing situation since the strong wind exceedance measured in the baseline case would be eliminated by the development.

Overall, on the basis that the overshadowing and wind assessments by the applicants accurately reflect the likely impacts, and there is no other analytic evidence to the contrary, the proposed development would not result in unacceptable impacts on the allotments.

Quality of Residential Accommodation

Policy D6 of the London Plan (2021) and the DCLG 'Technical Housing Standards (March 2015) set out the minimum gross internal floor space required for different sizes/occupancy levels of residential units. For the 140 residential units proposed, the table below sets out the range of floor areas provided per unit, and compares these with the minimum size requirement. Comparison is also made with the good practice flat sizes in the London Plan Housing Design Standards (2023).

Type/Size of Units	Unit Sizes	Minimum Required	Good Practice Size
1 bedroom / 1 person	38.0 m^2	37-39 m^2	43-41 m^2
1 bedroom / 2 persons	50.0 – 54.8 m^2	50 m^2	55 m^2
2 bedrooms / 3 persons	61.1 – 72.7 m^2	61 m^2	67 m^2
2 bedrooms / 4 persons	70.0 m^2	70 m^2	77 m^2
3 bedrooms / 5 persons	86.8 m^2	86 m^2	97 m^2

This shows that all the proposed residential units would meet the minimum spatial requirements of the London Plan in terms of floor area but would fall below the Good Practice recommended sizes. Based on the typical flat layouts submitted, the proposed room sizes would also meet relevant standards.

London Plan Policy D6 indicates that developments should minimise the number of single aspect dwellings, and particularly avoid single aspect dwellings facing north, or those containing three or more bedrooms. It seeks residential units to provide dual aspect living accommodation that would ensure better daylight, a choice of views and natural cross ventilation for future occupiers.

Policy 7B of LBE's Development Management DPD states: "Good levels of daylight or sunlight are levels that are appropriate to the uses proposed for internal rooms and external spaces within the curtilage of the building. In the case of residential development, for example, dual aspect dwellings are strongly encouraged in all developments and single aspect dwellings are unlikely to be acceptable where they are north facing".

In this context, 70 of the proposed 140 units would be dual aspect dwellings, 50% of the total. This is an improvement on the previous scheme's 67 units (48%) and the original scheme (63%). None of the single aspect units would be north facing and none would have 3 bedrooms. The development could be considered not to comply with London Plan Policy D6 since dual aspect dwellings would not provide the majority of units. Policy D6 also notes that dual aspect units provide a choice of views and that the design of single aspect dwellings must demonstrate that the orientation enhances amenity, including views.

In response, the applicants note that many of these single-aspect units would enjoy views over the adjacent allotments, or have long-distance views to the west and are shallow and wide so that the habitable spaces within them would have high levels of sunlight/daylight. The eastern and western elevations of the taller element would also allow for semi-recessed balconies which give oblique views from within the apartments while providing useful mitigation against overheating. They further argue that the purpose of London Plan Policy D6 in minimizing single-aspect units is to avoid low-quality units with poor daylight / ventilation and the submitted reports show that all the single aspect units would still receive good natural light and be well ventilated so that the spirit of Policy D6 is adhered to. A significant number of the single aspect units would face east towards the 10 storey Ravenswood Court building and their views would be more limited. It is worth noting that the similar developments recently approved along Bollo Land have generally been able to provide predominantly dual aspect units.

The building would now be served by two separate single cores with two staircases and 2-3 lifts in each and the number of flats served by a core would be no more than 5 for the northern core and 8 for the southern core.

A Daylight/Sunlight Assessment accompanies the application. This assesses levels of daylight and illuminance for all 326 habitable rooms within the proposed development, using the spatial daylight autonomy (sDA) methodology based on the latest BRE Guidance. This sets illuminance targets (measured in lux) to be achieved for over 50% of the space for more than half of the daylight hours in the year.

This found that 296 (91%) proposed habitable rooms, would have sDA daylight levels that meet or exceed the BRE recommendation for their room use. Of the 30 rooms falling short of this recommended level, 19 are open-plan living/kitchen/ dining rooms (LKDs), 10 are bedrooms and one is a studio. 120 (86%) of the 140 living spaces (LKDs & studios) would meet or exceed the BRE recommendation of 200lux within half the room for half the daylight hours within a year. A further 4 living spaces that fall short of the recommendation for rooms with a kitchen, would meet or exceed the BRE recommendation of 150lux for living rooms and were therefore considered to have acceptable daylight for their primary function as living spaces.

The 15 remaining LKDs and one studio with lower levels of daylight would all be on the lowest floors (up to 7th floor) on the eastern elevation and obstructed by the Ravenswood Court building. However, 5 of these 15 rooms would achieve the recommended illuminance for half the year within the front third of the room where the living room is located. Moreover, these living rooms would have large windows to maximise daylight and are located behind balconies, which provide valuable private amenity space but also obstruct daylight. A judgment needs to be made on the balance of these factors.

176 (95%) of the 186 bedrooms meet or exceed the BRE recommendation of 100lux within half the room for half the daylight hours within a year. The 10 bedrooms with lower levels of daylight would all be located on the lowest levels (3rd to 6th floor) on the eastern elevation, opposite Ravenswood Court. Five of these would achieve the recommended illuminance for half the year within the front third of the room. However, all 10 bedrooms would be beneath a balcony which restricts daylight but again provides important private amenity space.

Overall, the Assessment concludes that future occupants will be provided with a high standard of daylight and considers levels of daylight to be excellent for a scheme of this scale and location within an area undergoing regeneration. It also confirms that these findings would not be changed by development of the proposed scheme on the adjoining site at 8-10 Greenock Road.

In terms of sunlight, 136 (97%) of the 140 proposed living spaces would see at least 1.5 hours of sunlight on the appropriate dates. The other 4 are all served by windows not oriented within 90-degrees of due south and with a balcony located above their north-easterly facing window, so that access to sunlight is more restricted. The Assessment concludes the flats would have a high standard of sunlight.

Given that the BRE Guidance advises that its guidelines should be interpreted flexibly and applied sensitively to higher density developments such as this, there are no obvious reasons to dispute these findings.

On this basis, it is considered the proposed residential units would offer an acceptable standard of living conditions and would therefore comply with policies 7B and 7D of Ealing's Development Management DPD and London Plan Policy D6.

Accessible Units

Policy D7 of the London Plan requires at least 10% of all new dwellings to be designed to meet Building Regulation Requirement Part M4(3) for 'wheelchair user dwellings' while all other dwellings should meet Building Requirement Part M4(2) 'accessible and adaptable dwellings'.

A total of 14 flats (10%) would be designed as wheelchair dwellings to meet Building Regulation requirements for Part M4(3). The proposal would therefore meet the requirement of Policy D7.

In addition, all entrances would provide level access into the building and internal spaces are designed to be suitable for use by people with disabilities. The roof terraces would be fully accessible. Five car parking spaces would be provided for drivers with disabilities, accessed from Greenock Road and the cycle stores would accommodate large/cargo cycles.

Amenity Space
In terms of private amenity space, London Plan (2021) Policy D6 and Policy 7D of the adopted Ealing Development Management DPD (2013) requires all new residential development to have good quality private outdoor space, in accordance with minimum required levels. The policy requires a minimum of 5 sq m per 1 – 2 person unit and 1 sq m in addition for each additional occupant. Policy 7D also requires a minimum of 15 sq m of communal outdoor space per residential unit.

All of the flats would be provided with private external amenity space in the form of a balcony, with the sizes indicated below.

Unit Type/Size	No. of units	Minimum Required	Private Amenity Space provision
1 bedroom / 1 person	16	5 sq m	5.0 – 16.4 sq m
1 bedroom / 2 persons	59	5 sq m	5.0 – 11.5 sq m
2 bedrooms / 3 persons	53	6 sq m	6.0 – 11.5 sq m
2 bedrooms / 4 persons	4	7 sq m	7 sq m
3 bedrooms / 5 persons	8	8 sq m	8 sq m
Total	140		

In addition, a total of 410 sq m of outdoor communal amenity space is provided in terraces on the 10th and 17th floors. This has been reduced from 473 sq m as a result of the additional stairs in each core. The two smaller roof terraces on level 17 would provide communal spaces with moveable furniture and informal play provision.

Figure 12: Proposed Level 10 Roof Terrace

The 10th floor roof terrace is designed to be a more family-focused amenity space with a series of outdoor rooms connected by raised planters and seating. The 17th floor roof terrace would also have planting and seating areas as well as providing residents with views to the south and west.

The Council's Landscape section noted that for a development of this size, some 2,100 sq m of private amenity space would be required but only some 1,311 sq m of private/communal amenity space is proposed. This means the development is short of amenity provision by 789 sq m.

The applicants argue that there are a number of public open space areas within a reasonable distance of the site. These include Bollo Brook Park (0.5 km away), West Park (0.5km), South Acton Playground (0.5km) and Acton Green Common (1.1 km). However, the site lies within an area of district and local park deficiency and there has been considerable new housing development in this general area which will also place demands on these existing open spaces.

Some objectors argue that the lack of amenity space in this scheme, in an area of open space deficiency, should make it unacceptable and that S106 contributions cannot create new local open space to serve residents of the development where available land for it does not exist. However, the Council's Landscape section accept that this shortfall in amenity space and public open space can be mitigated by a S106 contribution of £105,900 to fund improvements to the existing South Park, Mill Hill Park (Avenue Road Park) and Bollo Brook Park.

The latest Daylight/Sunlight Assessment assessed the communal roof terraces on the 10th and 17th floors for overshadowing. The BRE guidance recommends that, for an area to be adequately sunlit, at least half of it ought to see at least two hours of sunlight on 21st March. The results show that the main roof terrace at 10th floor would have 73% of its area with at least 2 hours of direct sunlight and the

southern terrace on the 17th floor would have 72% with at least 2 hours. The northern terrace on the 17th floor would have 50% of its area with at least 2 hours of sunlight on 21st March. In addition, the assessment indicates that very good sunlight levels will be experienced during the summer period and the vast majority of all three amenity spaces will enjoy at least six hours of sunlight.

On this basis, the quality of the private amenity space provision for the flats can be considered acceptable.

The Ealing Development Management Plan DPD requires 1.7m sq m of allotment space per person, so that a total of 471.4 sq m would be required within this development. As none has been provided, a S106 contribution of £16,499 is sought.

On balance, with S106 contributions to mitigate on-site shortfalls, the current proposals for amenity and allotment space can be considered acceptable and to meet the objectives of the National Planning Policy Framework, policies D6 and S4 of the London Plan (2021) and 7D of the adopted Ealing Development Management DPD (2013).

Children's Playspace

London Plan Policy S4 requires development proposals to provide play and informal recreation space based on the expected child population generated by the scheme. The Mayor's Play and Recreation SPG and Policy S4 expect a minimum of 10 sq m per child to be provided in new developments.

Based on the GLA child yield calculator, the revised scheme is estimated to require a total of 290 sq m of dedicated children's play space on the site. The proposed roof terraces at levels 10 and 27 would provide 254 sq m of playspace for under 5s but the scheme as a whole would fall short in provision. This area has been reduced from 263 sq m as a result of the additional stairs in each core. This shortfall of 36 sq m means a S106 contribution of £2,506 would be required for improvements to local play facilities.

The GLA Stage 1 report on the original scheme indicated that the quality and design of equipment provided in play areas must be secured by planning conditions and that the applicant must demonstrate that all playspace is available to all children within the development and not segregated by tenure. In response, the applicants have confirmed in the Design and Access Statement Addendum that all residents would have access to the amenity areas and playspaces.

Subject to such contributions to mitigate the shortfall, the proposal can be considered to provide acceptable children's play space and meet the objectives of the National Planning Policy Framework, policy S4 of the London Plan (2021) and policy 7D of the adopted Development Management Development Plan Document (2013).

Landscape & Trees

An Arboricultural Impact Assessment accompanies the application. This indicates that there are no trees on the application site and therefore there would be no loss of trees arising from the proposals. However, there are 3 small groups of trees and 2 individual trees in close proximity on adjoining land beside the site that are assessed as moderate and low-quality trees. The assessment concludes the proposed development would have no impact on nearby trees. It also sets out protection measures for new trees being planted.

A total of 15 new trees are proposed to the public realm area beside the site, the locations of these to be confirmed. The three existing trees along the west side of Stanley Rd would be temporarily removed

and relocated within the site once the new building is complete. No comments have been received from the Council's Tree Officer.

In these circumstances, the proposals are considered acceptable given that conditions have been applied requiring details to be submitted of the hard and soft landscaping, boundary treatment, landscape management, tree planting, tree protection, green and brown roof construction and specification and maintenance schedule, and sustainable urban drainage systems to be implemented on site.

Urban Greening

London Plan Policies G1 and G5 identify urban greening as a fundamental aspect of site and building design with features such as street trees, green roofs, green walls, rain gardens, wildflower meadows, woodland, and hedgerows to be considered for inclusion and opportunities for ground level urban greening to be maximised. The scheme should also seek to achieve the Urban Greening Factor target, which is based on the amount of green infrastructure delivered within the landscape and on buildings. A target score of 0.4 is recommended for predominately residential developments.

In this case, with the intensive green roof, green wall, permeable paving and additional planting proposed, the Urban Greening Factor is indicated to be 0.25. This falls well below the London Plan target and would not normally be acceptable. The applicants argue that the size constraints of the site, alongside the competing need for plant and amenity space, make it difficult to meet the Urban Greening Factor target. They note that to improve the score close to 0.4 would require extending lawn and planting areas so that much of the roof level amenity space would become inaccessible to residents.

The applicants also note the range of other greening mechanisms proposed including green screens, flower rich perennial planting and permeable paving. They also point to the 15 large semi-mature trees to be planted within the parking area on Stanley Road along with 44 sq m of new shrub planting, which cannot contribute towards the UGF score as they are outside the site boundary.

Overall, while the proposal clearly does not comply with London Plan policies on urban greening, it can be argued that some flexibility should be applied due to site constraints and the new planting proposed just outside the site boundary.

Transport & Parking

Policy T6 of the London Plan (2021) indicates that car-free development should be the starting point for all development proposals in places well-connected by public transport. Policy T6.1 requires that new residential development should not exceed the maximum parking standards set out in Table 10.3. All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles.

The Public Transport Accessibility Level (PTAL) of the site is 1b (low) and it is in a Controlled Parking Zone (CPZ).

The existing vehicle access from Greenock Road would be retained and used for deliveries and servicing of both residential and industrial elements. Two servicing bays are proposed within an external undercroft area sized to allow for deliveries and refuse collection. It would also give access to the proposed on-site Blue Badge parking spaces. The transport assessment includes track plots for the largest vehicles expected to access the site and demonstrates that such vehicles can suitably turn and leave the site in a forward gear.

The latest revisions include reconfiguration of the service yard and car parking layout to facilitate a potential vehicular connection to the adjoining development at 8-10 Greenock Road.
The development proposes no on-site parking other than 5 disabled parking spaces at ground level, one of which would serve the industrial use.

The primary access for pedestrians and cyclists would be from Stanley Road with a secondary access for pedestrians and cyclists from Greenock Road.

The applicant indicates that the existing access road from Greenock Road would be upgraded and provide a separate pedestrian and cycle path to the site to minimise conflicts with vehicles. The footway along the western side of Stanley Road would be widened and a pedestrian passage provided between Stanley Road and Colville Road to improve pedestrian access. The detailed design of the access road would be funded by the applicant and this secured by a S106 Agreement.

Transport Services indicate a 'car free' development would be acceptable subject to addressing any adverse impacts. As the site is located in a CPZ, residents of the flats would need to be prevented from obtaining parking permits via a Section 106 agreement.

In addition to a restriction on resident parking permits to scheme residents, the developer has agreed to provision of free car club membership to all first occupants of the flats. This would be secured via a S106 Agreement.

Transport Services also note that the development will contribute to local parking congestion. As the development is in a Controlled Parking Zone, it could be developed as a low car housing by denying resident parking permits for the future residents. However, they note that the required number of disabled parking bays have not been provided and, if these cannot be provided, this needs to be justified. Creation of a home zone environment along the proposed internal roads is also requested. In addition, the following S106 financial contributions towards highway improvements have been identified to mitigate the road safety and parking problems caused by the development.

- £30,000 towards improvements on Bollo Lane junctions (between Gunnersbury Lane and Weston Road); this is to mitigate a road safety problem along Bollo Lane, which will be worsened by the additional pedestrian and cyclist trips from the development;

- £40,000 towards strengthening traffic calming measures on residential roads around the development including entry treatments at junctions and additional speed tables on adjacent junctions; this would be to mitigate accident levels around the application site;

- £25,000 towards improving the pedestrian/cycle bridge across the railway near South Acton Station; this reflects that a significant number of pedestrians and cyclists from this development are likely to use this bridge;

- £40,000 towards improving cycle infrastructure near the development; this is to promote a modal shift to cycling whilst reducing local accident risk;

- £15,000 to replace footways on both sides of Colville Road near the development; this reflects that more than 1,000 pedestrians per day from this development will use these footways;

- £20,000 towards reviewing and implementing the existing controlled parking zone and waiting restrictions near the development; this is to mitigate the impact of parking congestion on nearby roads;

- £5,000 towards improving bus stops near the application site; this is to mitigate increased demand at the existing bus stops near the site which are already congested at peak times;

- £3,000 towards Travel Plan monitoring.

In addition, conditions are requested requiring:

- proposed parking bays to be provided with electric charging points;
- submission of a Delivery and Servicing Management Plan (DSP);
- submission of a parking management plan;
- submission of a Construction Logistics Plan (CLP);
- submission of a plan showing the internal layout of the proposed road.

The GLA Stage 1 report indicated that the proposal would generate increased bus demand in peak periods and noted capacity issues on route 440 and the importance of this route in terms of direct access rail stations and key destinations along the route. TfL's comments on the latest revised scheme request a S106 contribution of £104,000 for bus service enhancements.

TfL also notes that the Active Travel Zone (ATZ) assessment dates from 2019 and query whether impacts on the active travel network have been appropriately assessed; given the site's current predominant industrial nature, they recommend a night-time ATZ should be undertaken.

However, the applicant has responded that a follow-on site visit in 2023 confirmed no significant change to the pedestrian and cycle environment to warrant an updated ATZ. They argue that the key barrier to walking and cycling within the industrial estate in the evening and night-time periods is the lack of active frontages within the industrial estate. The estate is subject to various planning applications for residential development that will increase activity and provide active frontages in the evening. Outside of the estate, the key routes to Chiswick Park, South Acton and Acton Town Stations are on streets with regular street lighting and run through residential streets with no blind corners. There are is also street lighting at regular intervals throughout the industrial estate. For the above reasons, the applicant considers a night-time ATZ is unnecessary and it has not been undertaken.

Tfl suggest that, since Greenock Road is privately owned, it should be demonstrated that the proposed development has rights of access. The applicant responds that this road is owned and maintained by Ealing Council while the applicant owns the service road from Greenock Road so that there should be no issue in terms of rights of access.

TfL also note that, as pedestrian access from Stanley Road appears to be via an existing private car park or from the pedestrian passage between Stanley Road and Colville Road., a high-quality environment to the pedestrian access points should be created and it should be demonstrated that the proposed development has rights of access. The applicant responds that Stanley Road is also owned and maintained by Ealing Council and has a footway and crossing facility connecting to the site's frontage, where a brand new footway will be implemented as part of the development.

TfL comment that, since Greenock Road is privately owned, it would also be useful to understand the measures that will be implemented to ensure that residents from the development do not park on this road. However, as noted above, this road is owned and maintained by Ealing Council. In addition, double yellow lines on it prevents parking throughout the day while it also forms part of the South Acton Industrial CPZ which is in force Monday-Friday 8am-6pm.

With regard to Delivery and servicing, TfL note that the scheme design allows for a one-way delivery and servicing route with the adjoining site at 8-10 Greenock Road and that delivery and servicing

vehicles would be able to enter and exit the site in a forward gear. However, they consider further thought is needed on how this would work with the adjoining site as it appears to be tight with some encroachment on the public realm. In response, the applicant commits to working with the adjacent site to improve vehicle circulation and manage the arrangement between the two sites, and this would be secured as part of the discharge of planning conditions relating to the Delivery & Servicing Plan.

In accordance with the Healthy Street approach outlined in the London Plan, TfL also sought contributions via S106 and S278 agreements are required with respect to public realm and highway improvements in the vicinity of the site. A Parking Design and Management Plan, secured through the appropriate mechanism, should also demonstrate how a further 7% of flats could be provided with a disabled person parking bay as and when demand arises. A condition is applied to secure this.

In terms of cycle parking, Table T5 of the London Plan (2021) requires cycle parking at least in accordance with minimum standards set out in Table 10.2. This requires 1 space per 1 person/1 bedroom dwelling, 1.5 spaces per 2 person/1 bedroom dwelling and 2 spaces for all other dwellings. Requirements for the industrial and commercial space are based on floorspace. Overall, the proposed residential development would require 236 long stay cycle spaces and the industrial element 4 long stay spaces.

In this context, a total of 230 long stay cycle parking spaces and 5 short-stay visitor spaces are proposed for the flats. The long stay residential cycle store would be provided at first and second floor levels of the building with a mix of accessible spaces, Sheffield stands and two tier racks and able to accommodate non-standard bikes. These cycle stores would be accessed via a dedicated cycle lift. The cycle stores would be secured with fob access and lit by movement sensor lighting.

For the industrial space, 4 long stay cycle parking spaces would be located within the industrial units. In addition, 2 short stay visitor spaces will be located near the industrial entrance.

This level of provision would meet London Plan cycle parking standards and is therefore considered acceptable. However, TfL request a condition to be applied requiring cycle parking to be designed to accord with London Cycle Design Standards. This condition has been applied.

Several objectors raise concerns on road safety issues and access for emergency vehicles. They note the proposal will lead to a large local increase in population with resultant increases in delivery vehicles etc. They indicate the end of Stanley Road is designed to allow vehicles, including emergency vehicles, to turn around and it is unclear how this will be maintained with the new development. Also, although Stanley Road is to be predominantly pedestrian, with vehicle access from Greenock Road, it is unclear how this would be enforced to prevent excessive numbers of delivery, trade, and private vehicles using the end of Stanley Road and creating a dangerous public space for pedestrians. However, Transport Services consider these issues can be controlled through appropriate measures in a Travel Plan, which would be subject to approval.

Overall, with the recommended conditions and S106 obligations, the proposal would be acceptable in terms of transport and highways and consistent with section 9 of the National Planning Policy Framework (2023) and Policies T4, T5 and T6 of the London Plan (2021).

Ecology

A preliminary ecological assessment accompanies the application. This notes that the site is not part of any statutory or non-statutory designated nature conservation site. The Gunnersbury Triangle Local Nature Reserve (LNR) and Site of Metropolitan Importance for Nature Conservation (SMINC) lies approximately 450m south of the site and the Silverlink Metro and Duding Hill Loop railsides Site of

Borough Grade II Importance for Nature Conservation (SBINC) runs some 100m to the south.

The assessment concludes that the application site consists entirely of buildings and hardstanding, with no semi-natural habitats except for those encroaching from the adjacent allotments. It contains habitats of value at site level only. Various recommendations are also made:

- to limit disturbance to the South Acton Allotments, adequate protection to prevent accidental damage or pollution should be implemented with no works or storage of materials in the designated protected area;

- with regard to breeding birds, where the proposed works require the removal of scrub on or immediately adjacent to the site with potential to support breeding birds, this should be carried out from September to February, to avoid harm to breeding birds during the main breeding season;

- in the unlikely event that any other protected species are found during site clearance or construction, works should stop immediately and advice sought from a suitably qualified ecologist;

- enhancing the wildlife value of the roof by inclusion of areas of biodiverse roof on the new building, with a low-nutrient biodiverse roof recommended which includes additional habitat features such as varied substrate depths and types, deadwood and/or rubble piles and temporary pools;

- site landscaping should include climbing plants on a support structure to provide vertical nesting habitat and foraging resources for birds and invertebrates; plants should comprise native species or non-native species of recognised wildlife value and either deciduous or evergreen species;

- provision of nesting opportunities for birds with two woodcrete Schwegler 1B hole-front bird boxes suitable for house sparrow and other hole-nesting bird species integrated into the development; these boxes should be installed in a sheltered recess at roof level, out of direct sunlight, adjacent to the allotments.

A condition is applied to require these recommendations to be implemented.

Environmental Pollution

London Plan policies D14 and SI 1, Ealing Development (or Core) Strategy policies 1.1 (e) and (j); Ealing Development Management policies 5.21 and 7A are relevant with regard to noise and air quality issues.

The site adjoins an industrial estate with some industrial traffic which could give rise to noise and air quality impacts for the proposed residential units. An Environmental Noise Report and an Air Quality Assessment accompany the application.

The Noise Report notes that, in order to achieve the relevant internal noise limits for flats, it will be necessary to use acoustic double glazing for levels 2 to 9 on the southern facade of the building, while the rest of the building can incorporate thermal double glazing. It also notes that noise levels at the amenity space on Level 10 would be adequate as they would be below the 55 dB recommended level.

Regulatory Services have reviewed the submitted Noise Report and consider it provides insufficient information about the noise environment, particularly because the site is affected by noise and odours from the nearby laundry. No objection is raised on noise grounds but an updated Environmental Noise report is required, as well as various conditions relating to noise mitigation, lift noise, insulation between flats and between flats and industrial uses, hours of operation of the commercial/industrial

uses, and provision of a Construction/Demolition Management Plan. These conditions have been applied.

With regard to air quality, the submitted Air Quality Assessment concludes that, with appropriate mitigation in place, the air quality impacts of the construction phase would not be significant as a range of best practice mitigation measures would be implemented to reduce dust emissions. With regard to the operational phase, taking account of the proposed emergency plant, it considers that the proposed development will not lead to unacceptable air quality for residents and its impact would be not significant. It also asserts that the proposed development would meet the London Plan's requirement for new developments to be at least 'air quality neutral'.

Regulatory Services do not object to the proposals on air quality grounds but seek conditions requiring approval of an Air Quality and Dust Management Scheme and a Ventilation Strategy, restrictions on emissions from any non-road mobile machinery and approval of details for any new installed diesel generators. Also, as the whole borough is an Air Quality Management Area, a S106 contribution of £23,690 is required towards implementing air quality improvement actions within the Council's Air Quality Action Plan.

In relation to contaminated land, Regulatory Services have no objections but given the current industrial use, require conditions requiring site investigation, followed by remediation and verification if required.

Wind Effects

London Plan policy D3 indicates developments should create a comfortable pedestrian environment with regard to levels of sunlight, shade and wind. Policy D8 requires new developments to consider microclimatic considerations, including wind. Policy D9 requires wind conditions around tall buildings to be carefully considered and not compromise comfort and the enjoyment of open spaces around the building.

A Wind Assessment accompanies the application and assesses the revised scheme along with other proposed developments nearby, include 8-10 Greenock Road. It notes that the following measures are included in the design as embedded wind mitigation measures:

- tree planting comprising 2 x 10m evergreen, 8x 7m deciduous and 3x 5m deciduous trees;
- 1.5m high hedges at terrace level on top of the planters;
- 1.3m 50% porous balustrades on balconies at north west and south west corners of the development;
- 1.1m 50% porous balustrades on all other balconies;
- a 50% porous 2.5m tall cage at the south of site;
- a 2.1m high, 30% porous gate at the north west corner of the site.

The Assessment concludes that, with these measures in place -

- conditions on the Level 10 terrace would be suitable for a mix of sitting and standing in all seasons and suitable for the intended use.

- conditions on the Level 17 terraces would be suitable for a mix of sitting and standing in winter and for sitting in summer and suitable for the intended use.

- conditions on all balconies would be suitable for either sitting or standing in all seasons and suitable for their intended use.

- all principal proposed entrances would be suitable for sitting in all seasons and for their intended use;

- all principal off-site entrances would be suitable for either sitting or standing in all seasons and their intended use;

- South Acton station platforms would be suitable for sitting in all seasons and for their intended use.

- the South Acton East Allotments would be suitable for a mix of sitting and standing in winter and sitting in summer and for their intended use.

It adds that the cumulative effect of future developments nearby will result in generally calmer conditions around the site and conditions will remain suitable for the intended use.

There are a number of residents' objections relating to adverse wind tunnel effects, particularly on the adjoining allotments and asserting that the applicant's assessment is flawed. However, there is no evidence to support this assertion and, as noted above, the Wind Microclimate Report and Addendum indicate that the proposed development would help reduce wind speeds over the allotments.

Energy/Sustainability

The provision of sustainable development is a key principle of the National Planning Policy Framework (2021), which requires the planning process to support the transition to a low carbon future. Policy SI2 of the London Plan (2021) requires submission of an energy demand and sustainability assessment, along with the adoption of sustainable design and construction measures and demonstration of how heating and cooling systems have been selected in accordance with the Mayor's energy hierarchy. In particular, policy SI2 requires the domestic element to meet zero carbon and the non-domestic element to meet the 35% CO2 emissions reduction target beyond Building Regulations Part L 2013. For the domestic element, a minimum 35% reduction in regulated CO2 emissions above Building Regulations 2013 is expected to be achieved on-site. Any shortfall will be met through a S106 carbon offset contribution.

Policy SI2 in the London Plan (2021) requires development to monitor, verify and report on energy performance in operation. This policy is reflected in Ealing Council's 2013 DPD policy E5.2.3 which requires the post-construction monitoring of renewable/low-carbon energy equipment.

London Plan policy SI3 recognises that combined heat and power (CHP) may have negative effects on London's air quality and that electric air-source-heat-pumps are a better carbon reduction option than gas fired CHP. In addition, section 10.2 of the GLA (2020) Energy Assessment Guidance expects all major development proposals to maximise on-site renewable energy generation regardless of whether a 35% target has already been met.

The applicant has submitted an energy statement, setting out how the development would reduce carbon dioxide emissions. This has been reviewed by the Council's Energy & Sustainability advisor who supports the proposed energy strategy and notes that an Overheating/Cooling analysis with proposed mitigation measures has been carried out. It is accepted that the size and type of development is not suitable for Combined Heat and Power (CHP) and that there is no available "Clean" district heat network (DHN). The development would be all electric with no gas infrastructure on-site. A communal Air Source Heat Pump distribution loop with dwelling heat exchangers would feed panel radiators and provide domestic hot water, with no storage tanks in dwellings. Photo-Voltaic panels are also proposed.

At the current design stage the overall site-wide CO_2 emissions will be cut by at least 70.41% against BR Part L 2021 (using SAP 10.2 conversion factors), with 7.09% through "Lean" efficiency measures, and 63.31% through "Green" renewable energy. There is a shortfall of 975.3 tonnes CO_2 (over 30 years) in the zero-carbon that will be mitigated through an "offset" S106 payment at £95 per tonne to the Council of £92,657.

The proposed energy and sustainability strategies are considered generally acceptable but conditions are required as well as a S106 contribution (£8,618) towards low-carbon/renewable energy monitoring. Any carbon shortfall will be addressed through a S106 carbon offsetting contribution.

Various conditions are also sought on the Circular Economy, Whole Life-Cycle Carbon Assessment, post construction energy equipment monitoring, implementation of the approved sustainable design and construction measures and on energy monitoring.

Subject to these conditions and S106 requirements, the development is considered to comply with national, regional and local policies in terms of sustainability.

Circular Economy

To comply with Policy S17 of the London Plan, a Circular Economy Statement has been submitted. This sets out targets for minimising demolition waste, excavation and construction waste and for recovery of building materials. Key measures include efficient design to reduce the quantity of materials required, designing for longevity and reusability, development of a resource management plan and a waste management strategy. A condition is applied to require implementation of the development in line with the measures set out in the Statement.

Agent of Change

Policy D13 of the London Plan (2021) states that:

- the responsibility for mitigating the impacts from existing noise and other nuisance-generating activities or uses falls on the proposed new noise-sensitive development;
- development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue without unreasonable restrictions being placed on them;
- new noise and other nuisance-generating development near residential and other noise-sensitive uses should mitigate and manage noise impacts for neighbouring residents and businesses.

The GLA Stage 1 report on the original scheme noted that the proposal would be close to the boundaries of adjacent sites with industrial uses and the proposals needed to be designed to ensure that the function of neighbouring industrial uses is not compromised, in accordance with Policy D13 of the London Plan.

An Agent of Change report accompanies the application. This indicates that residential occupiers would not be adversely impacted by baseline conditions of odour, dust, vibration and lighting from surrounding industrial uses but also notes there may be adverse impact on residential occupiers from noise from passing trains, building services plant and 'general industrial noise. The GLA Stage 1 Report required the mitigation measures to address these impacts, as set out in the Noise and

Vibration Report, to be secured by condition. These include acoustic double glazing for levels 2 to 9 on the southern façade. A condition has been applied to secure this.

With this mitigation in place, the proposal would be acceptable in this regard.

Crime Prevention

Explanatory text for London Plan Policy D3 indicates that measures to design out crime should be integral to development proposals and be considered early in the design process. Policy D11(c) emphasises that development should include measures to design out crime.

The Metropolitan Police Design Out Crime team has assessed the proposed development and sees no reason why it could not achieve a Secured by Design Accreditation. Nevertheless, a planning condition has been requested requiring compliance with Secure by Design Standards.

Refuse & Recycling Storage

Policy SI 7 of the London Plan (2021) requires the design of developments to include adequate, flexible, and easily accessible storage space and collection systems. The London Housing Supplementary Planning Guidance 2016 (standard 2.3.18) requires refuse stores to be accessible to all residents.

For the proposed 140 flats, the total refuse/recycling storage provision required would be broadly equivalent to 12,500L of refuse and 12,500L of recycling bins.

Separate storage areas for residential and industrial refuse would be provided on the ground level of the building. For the flats, a secure storage area for bins would contain 25 x 1,100L bins, which would be adequate capacity. To reduce the size of the bin store, a managed bin storage arrangement is proposed. This involves making three bins for general waste, recycling and food waste available for residents to access and use at any one time, and when full these would be rotated by building management into a storage area for full bins behind.

The refuse and recycling strategy for the flats is also based on a twice weekly collection. The first collection would be made by the local authority and the second collection by a private contractor. This strategy allows for the amount of bin provision to be reduced and take up less space on the ground floor.

The bin storage area for the industrial use would be located within the northernmost ground floor unit, with access to the service yard provided via a walkway along the western site boundary that has a minimum width of 1.5m.

All refuse and recycling would be collected on site within the service yard with vehicular access taken from Greenock Road. Swept path analysis for the service yard layout confirms that there are sufficient turning zones and clear head height for refuse vehicles.

On this basis, the scheme would be acceptable in terms of London Plan policy SI7.

Drainage and Flood Risk

Policy LV 5.12 (Flood Risk Management) of the Ealing Development Management Document DPD (2013) requires all forms of development to ensure that every vulnerability to surface water, sewer and ground water flooding is fully assessed.

A Flood Risk Assessment and Drainage Strategy and Water Quality Management Report have been submitted and the Flood Risk Assessment concludes that:

The site lies in Flood Zone 1 (low probability of flooding) and the proposed development appears at low risk of flooding from all sources. A Flood Risk Assessment, Drainage Strategy and SUDS Information have been submitted with this application.

The submitted Flood Risk Assessment indicates that the proposed development would be safe, would not increase flood risk elsewhere and the residential use is considered appropriate in a Flood Zone 1 area.

The submitted Drainage Strategy concludes that:

- as the existing site is developed brownfield, the proposals will not increase the existing 100% impermeable area and hence storm water runoff but the surface water runoff rate of water from the site would decrease overall;

- a Sustainable Drainage Scheme (SuDS) is proposed to manage surface water run-off from the development site in line with current best practice;

- due to the limited site area and density of development, the SuDS solutions are more limited but the primary attenuation would involve an underground storage tank with controlled discharge to the existing adopted storm drainage;

- the attenuation facility has been designed on the basis of a run-off flow of 5l/s for all events up to and including the 100 years plus 40% climate change event;

- the foul drainage discharge would be connected to the existing adopted foul sewer immediately to the north of the development;

- the proposed development can be implemented in a sustainable manner without increasing the flood risk either at the site or to any third-party land.

The GLA Stage 1 report noted that the surface water drainage strategy for the original scheme did not comply with Policy SI.13 of the London Plan, as it did not give appropriate regard to the drainage hierarchy. It sought further details should be provided on how SuDS measures at the top of the drainage hierarchy would be included in the development along with additional information on SuDS maintenance.

In response, the applicants noted that details on SuDS measures at the top of the drainage hierarchy are provided in the Drainage Strategy Report Rev 01 dated 17/06/2020, which includes a summary of the SuDS selection process, and provides a typical maintenance schedule for the attenuation and flow control devices proposed on the site.

The GLA Stage 1 report also indicated that the development did not meet the requirements of Policy SI5 of the London Plan with respect to water consumption targets and should be amended accordingly.

The applicants' response was that, as a speculative development, the proposed building would only provide capped connections to the industrial unit and it would then be the responsibility of the tenant to install water consuming appliances as part of their fit-out. Water consumption requirements would be dealt with as part of a Green Lease Agreement and the following requirements would be included within this Agreement, resulting in a 45% improvement over the BRE baseline building equivalent to BREEAM Excellent):

- WC's: 3 litre / 4.5 litre dual flush
- WHB Taps: 4 litre / min @ 3 bar pressure
- Showers: 8 litre / min @ 3 bar pressure
- Kitchenette Taps: 5 litre / min @ 3 bar pressure
- Dishwashers: 10 litre / cycle

Thames Water raised no objection with regard to foul water sewerage network infrastructure capacity but requires a condition on surface water wastewater such that no flats are occupied before network upgrades required to accommodate the additional flows from the development have been completed, or a housing and infrastructure phasing plan has been agreed with Thames Water. It also requires various informatives to be added.

Conditions are therefore applied on surface water wastewater as well as to require submission and approval of a drainage design for SUDS features and a drainage management plan for SUDS components.

On this basis, with the above conditions, measures can be implemented to make the scheme acceptable in terms of drainage and flooding.

Employment & Training

London Plan Policy E11 requires that development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate.

In this context, the Council's Regeneration section request that the developer produce a Local Employment & Training plan, which will set out commitments for both the construction phase of the development and end user opportunities. These would include:

- S106 contribution of £12,500 for coordinating and monitoring training and employment opportunities.
- apprenticeships during construction phase
- 11 work experience opportunities for 16+ years old
- developer to work with Councils' brokerage service to set up the above opportunities;
- notification of all job, apprenticeship and work experience vacancies at levels 4 and below to LB Ealing's job brokerage service;
- 25% of all vacancies to be filled by Ealing residents with a long-term connection to the borough;
- non-negotiable penalty of £10,000 per apprenticeship if apprenticeship opportunities not created.

These commitments would be secured via the S106 Agreement.

Community Infrastructure Levy (CIL)

In accordance with the Community Infrastructure Levy (CIL) regulations the commercial elements of the development would normally be liable to pay CIL at £60 per square metre. Affordable housing is not liable to CIL payments.

The proposed development involves 140 residential units, an increase of 10,962 sq m of residential GIA floorspace and a net gain of industrial floorspace of 717 sq m following demolition of the existing industrial building. However, some 4,965 sq m of the residential floorspace would be in affordable dwellings which are exempt from CIL. The proposed development would therefore be liable for a CIL payment based on a net additional 6,726 sq m of floor space. The amount is estimated to be in the order of £403,000 subject to indexation but the final figure would be confirmed by the Council's CIL collections officer.

Fire Safety

Large schemes may require a number of different consents before they can be built. Building Control approval needs to be obtained to certify that developments and alterations meet building regulations. Highways consent will be required for alterations to roads and footpaths. Various licenses may be required for public houses, restaurants and elements of the scheme that constitute 'house in multi-occupation'. The planning system allows assessment of a number of interrelated aspects of development when planning applications are submitted to the Council. The proposed materials to be used may be approved under a planning permission based on the details submitted as part of the planning application or may be subject to a condition that requires such details to be submitted and approved prior to the commencement of the development. Whichever the case, planning officers' appraisal of materials is focused on the visual impact of such materials in relation to the design of the overall scheme itself, the character of the local area or indeed on the amenities of local residents.

The technical aspects of the materials to be used in any development, in relation to fire safety, are considered under the Building Act (1984) and specifically the Building Regulations (2010). These require minimum standards for any development, although the standards will vary between residential and commercial uses and in relation to new build and change of use/conversions. The regulations cover a range of areas including structure and fire safety. Any person or organisation carrying out development can appoint either the Council's Building Control Service or a Private Approved Inspector to act as the Building Control Body (BCB), to ensure the requirements of the Building Regulations are met. The BCB would carry an examination of drawings for the proposed works and carry out site inspection during the course of the work to ensure the works are carried out correctly. On completion of work the BCB will issue a Completion Certificate to confirm that the works comply with the requirement of the Building Regulations. In relation to fire safety in high rise residential developments some of the key measures include protected escape stairways, smoke detection within flats, emergency lighting to commons areas, cavity barriers/fire stopping and the use of sprinklers and wet/dry risers where appropriate.

In this context, a Fire Statement accompanies the application. As requested by the GLA, conditions are applied to secure the implementation and monitoring of measures identified in the Fire Statement.

Local residents have objected to the proposal on the grounds that the site is at the bottom end of Stanley Road, which is a narrow dead-end. Following the Grenfell Fire Inquiry, they say that London Fire Brigade (LFB) now require 5 engines to attend a fire for a block the height of this proposal. While the application has provided a fire assessment (attached), the residents say this lacks any review of impacts on existing buildings and LFB's ability to affect a successful evacuation of them. They suggest an important aspect noted in the Grenfell Inquiry report was the inability to deploy vehicles used for external capabilities on 3 sides of the building, a situation similar to that present at Stanley Road.

The applicant's fire consultant has provided the following response to these points:

- the submitted fire statement is based upon the current Regulations and not against the Grenfell Fire Inquiry Report but if matters raised in that Report become regulations in the future, these would be followed; this point is therefore not relevant at this time.
- the lack of emergency vehicle turning space in Stanley Road is a current condition that the new building will not alter or make worse;
- the current Fire Regulations only call for one fire tender to be considered, not five, and do not call for 3 sides of a building to have fire vehicle access;
- the approach to access for a fire tender is noted as acceptable in the fire statement based upon current Regulations and there is access to the west side of the building (sized to accommodate a bin lorry) which could also be used by the fire brigade.

London Fire Brigade has been consulted on this application and the residents' specific objection points raised with them. However, no response has been received.

The Health & Safety Executive (HSE) raised concerns on the apparent lack of fire hydrants within 90m of the proposed building entrance and requires additional fire hydrant provision. It is also concerned on the lack of information on the functional status of the existing fire hydrant near the site. However, the applicants have submitted information from Thames Water to confirm that the hydrants are in place and operable.

On this basis, there is nothing to indicate that the proposals would not comply with current fire regulations.

Conclusions

The proposed development will provide a significant amount of new dwellings and an increase in modern industrial space within an industrial area and affordable dwellings would form 35% of the proposed flats.

This would be achieved by providing a large amount of development in a tall building on a very small, constrained site and this results in some viability issues and a number of conflicts with policy. These include a deficiency of amenity space and children's playspace on the site, an Urban Greening Factor below the London Plan target, a high proportion of single aspect flats, and some impacts on outlook from nearby dwellings. As with other schemes, some of these deficiencies can be mitigated by S106 contributions towards improvements to local open space and transport infrastructure.

There have been a large number of objections to the proposal from local residents, mainly related to its height being excessive and out of keeping with the regenerated Acton Gardens area, adverse impacts on light and overlooking to nearby dwellings and overshadowing and wind impacts on the adjoining allotments. After careful review, it is not considered that impacts on daylight of nearby dwellings or on the allotments would justify refusal.

The scheme has been assessed against the recently ratified South Acton LSIS Masterplan, and generally conforms to its principles, including being appropriately located within an identified co-location zone, on the southern portion of the industrial area. Whilst there would be a limited breach in the heights identified within the Masterplan, with 17 storeys exceeding the 15-storey requirement, it is considered that there are significant public benefits to the scheme that justify this breach by a 'limited margin'. However, the proposal would accord with many, if not all, of the London Plan Policy D9 and Ealing design guidance criteria for tall buildings and its wider visual impact is considered acceptable.

In forming a recommendation on this scheme, a balance needs to be considered between the deficiencies highlighted above and the scheme's benefits for the surrounding area, which can be summarised as:

- provision of modern industrial units with a large increase in industrial floorspace;
- an increase of some 25-40 local jobs;
- increasing the housing stock by 140 flats;
- provision of 42 affordable dwellings;
- improvements to the public realm along Stanley Road.

On balance, therefore, if some flexibility can be accepted towards the scheme's deficiencies and its housing and industrial benefits set against these, it can be recommended for approval subject to conditions and S106 and S278 Agreements.

Human Rights Act

You are referred specifically to Article 8 (right to respect for private and family life), Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for approval in this case interferes with local residents' right to respect for their private and family life, home and correspondence, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation for approval is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

Public Sector Equality Duty

1. In making your decision you must have regard to the public sector equality duty (PSED) under s.149 of the Equalities Act. This means that the Council must have due regard to the need (in discharging its functions) to:

A. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act

B. Advance equality of opportunity between people who share a protected characteristic and those who do not. This may include removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; taking steps to meet the special needs of those with a protected characteristic; encouraging participation in public life (or other areas where they are underrepresented) of people with a protected characteristic(s).

C. Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

2. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

3. The PSED must be considered as a relevant factor in making this decision but does not impose a duty to achieve the outcomes in s.149 which is only one factor that needs to be considered and may be balanced against other relevant factors.

4. It is considered that the recommendation to grant planning permission in this case would not have a disproportionately adverse impact on a protected characteristic.

APPENDIX 1

Conditions/Reasons:

1. Time Limit 3 years - Full Permission

The development permitted shall be begun before the expiration of three years from the date of this permission.

Reason: In order to comply with the provisions of the Town and Country Planning Act 1990 (as amended).

2. Approved Plans and Documents

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

GRE-HTA-A-0001 Rev P2, GRE-HTA-A-0050 Rev P2, GRE-HTA-A-0150 Rev P2, GRE-HTA-A-0151 Rev P2, GRE-HTA-A-0152 Rev P2, GRE-HTA-A-0153 Rev P2, GRE-HTA-A-0154 Rev P2, GRE-HTA-A-0210 Rev P2, GRE-HTA-A-0211 Rev P2, GRE-HTA-A-0212 Rev P2, GRE-HTA-A-0213 Rev P2, GRE-HTA-A-0260 Rev P2, GRE-HTA-A-0261 Rev P2, GRE-HTA-A-0262 Rev P2, GRE-HTA-A-0310 Rev P2, GRE-HTA-A-0311 Rev P2, GRE-HTA-A-0312 Rev P2, GRE-HTA-A-0313 Rev P2, GRE-HTA-A-0318 Rev P2, , GRE-HTA-A-0320 Rev P2, GRE-HTA-A-0326, GRE-HTA-A-0327, GRE-HTA-A-0328, GRE-HTA-A-0329, GRE-HTA-A-0330,GRE-HTA-A-0331, GRE-HTA-A-0332, GRE-HTA-A-0333, GRE-HTA-A-0334, GRE-HTA-A-0335, GRE-HTA-A-0336, GRE-HTA-A-0337

Planning and Affordable Housing Statement, prepared by DP9 Ltd; Townscape & Visual Impact Appraisal, prepared by Arc; Historic Environment Assessment, prepared by MOLA; Arboricultural Impact Assessment, prepared by Landmark Trees; Air Quality Assessment, prepared by Air Quality Consultants; Preliminary Ecology Appraisal, prepared by the Ecology Consultancy; Geo-Environmental Desk Study, prepared by WSP; Energy Statement (including overheating), prepared by Twin Earth; Sustainability Strategy (including Ealing sustainability checklist), prepared by Twin Earth; Noise and Vibration Assessment, prepared by Sandy Brown; Statement of Community Involvement, prepared by Four Communication; Commercial Assessment Report, prepared by CFC Commercial; and Agent of Change Assessment, prepared by Trium (all documents submitted November 2021)

Design and Access Statement Addendum, prepared by HTA; Statement of Community Involvement Addendum, prepared by Four Communications; Townscape and Visual Impact Appraisal, prepared by Arc; Heritage Statement, prepared by Gareth Jones Heritage Planning; Energy Statement Addendum, prepared by Twin & Earth; GLA Consultation – Energy Memo, prepared by Twin & Earth; Sustainability Statement Addendum, prepared by Twin & Earth; Whole Lifecycle Carbon Report (including Appendix B GLA spreadsheet), prepared by Twin & Earth; Circular Economy Statement, Prepared by Twin & Earth; Air Quality Assessment Addendum, prepared by Air Quality Consultants; Archaeological Desk-Based Assessment Report Addendum, prepared by Museum of London Archaeology; Drainage Strategy Statement of Conformity (including June 2020 Drainage Strategy), prepared by WSP; Geo-Environmental Desk Study Statement of Conformity, prepared by WSP; Arboricultural Impact Assessment Statement of Conformity, prepared by Landmark Trees; and Commercial Assessment Report Statement of Conformity, prepared by CF Commercial (all documents submitted October 2021)

Planning Application Form, prepared by DP9 Ltd (September 2023); Community Infrastructure Levy Additional Information Form, prepared by DP9 Ltd (September 2023); Planning Application Drawings,

prepared by HTA (August 2023); Schedule of Accommodation, prepared by HTA (August 2023); Design and Access Statement Addendum, prepared by HTA (August 2023); Townscape and Visual Impact Appraisal Addendum Note, prepared by Neaves Urbanism (August 2023); Heritage Assessment Statement of Conformity, prepared by Gareth Jones Heritage Planning (August 2023); Flood Risk Assessment, prepared by RMA Environmental (August 2023); Transport Assessment, prepare by Caneparo (August 2023); Travel Plan, prepared by Caneparo (August 2023); Delivery and Servicing Plan, prepared by Caneparo (August 2023); Outline Construction Logistics Plan, prepared by Caneparo (August 2023); Energy Statement Addendum, prepared by Twin & Earth (August 2023); GLA's Carbon Emission Reporting spreadsheet, prepared by Twin & Earth (August 2023); Sustainability Statement Addendum, prepared by Twin & Earth (August 2023); Whole Lifecycle Carbon and Circular Economy Addendum, Prepared by Twin & Earth (August 2023); Air Quality Assessment Statement of Conformity, prepared by Air Quality Consultants (August 2023); Archaeological Desk-Based Assessment Report Addendum, prepared by Museum of London Archaeology (August 2023); Planning Fire Safety Statement, prepared by Hilson Moran (August 2023); Fire Statement Form, prepared by Hilson Moran (August 2023); Ventilation Statement, prepared by Hilson Moran (August 2023); Daylight and Sunlight Report – Impact on Neighbouring Properties, prepared by GIA (August 2023); Daylight and Sunlight Report – Internal, prepared by GIA (August 2023); Wind Microclimate Assessment Report, prepared by GIA (August 2023); Preliminary Ecological Appraisal (PEA) Statement of Conformity, prepared by Temple Group (August 2023); Noise and Vibration Assessment Statement of Conformity, prepared by Sandy Brown (August 2023); and; Agent of Change Assessment Statement of Conformity, prepared by Trium (August 2023).

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

3. Details of Materials - Building

Details of the materials and finishes to be used for all external surfaces of the building within the development shall be submitted to and approved in writing by the local planning authority before any part of the super structure of the development is commenced and this condition shall apply notwithstanding any indications as to these matters which have been given in this application. The development shall be implemented only in accordance with these approved details.

Reason: To ensure that the materials and finishes are of high quality and contribute positively to the visual amenity of the locality in accordance with policies 1.1 (h) (g), 1.2(h), 2.1(c) and 2.10 of the Ealing Core Strategy (2012), policies ELV 7.4 and 7B of the Ealing Development Management Development Plan Document (2013), policies D3 and D6 of the London Plan (2021) and the National Planning Policy Framework (2023).

4. Hard/ Soft Landscaping and Boundary Treatment

Details of hard/soft landscape works, tree planting and boundary treatment for the site shall be submitted to and approved in writing by the local planning authority before any part of the super structure is commenced and this condition shall apply notwithstanding any indications as to these matters which have been given in this application. The scheme shall include comprehensive details of the full planting specifications (size, species and numbers), the positions of all planting, ground preparation for tree planting, and staking/tying methods where applicable. The development shall be implemented only in accordance with these approved details. Any trees or other plants which die or are removed within the first five years following the implementation of the landscaping scheme shall be replaced during the next planting season.

Reason: To ensure that the development is landscaped in the interests of the visual character and appearance of the area and amenity of prospective occupiers, and in accordance with policies G5 and

G7 of the London Plan (2021), policies 1.1 (h) (g), 1.2 (f), 2.1(b) and 2.10 of the Ealing Core Strategy (2012), policies ELV 7.4 and 7B of the Ealing Development Management Development Plan Document (2013) and the National Planning Policy Framework (2023).

5. Landscape Management Plan

Details of a Landscape Management Plan to cover a minimum period of 5 years from the implementation of final planting shall be submitted to and approved in writing by the local planning authority prior to the first occupation or use of the flats hereby approved. The development shall be implemented only in accordance with these approved details and retained thereafter.

Reason: To ensure that the development is landscaped in the interests of the visual character and appearance of the area and amenity of prospective occupiers, and in accordance with policies G5 and G7 of the London Plan (2021), policies 1.1 (h) (g), 1.2 (f), 2.1(b) and 2.10 of the Ealing Core Strategy (2012), policies ELV 7.4 and 7B of the Ealing Development Management Development Plan Document (2013) and the National Planning Policy Framework (2023).

6. Size of servicing vehicles

The size of vehicles servicing the development shall be limited to 10m rigid lorries.

Reason: In the interests of highway/pedestrian safety and an appropriate operation of the development in accordance with policies 1.1(e) and 1.1(j) of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management Development Plan Document (2013), policy T6 of the London Plan (2021), and the National Planning Policy Framework (2023).

7. Cycle Parking

The approved cycle parking facilities shall be designed to accord with London Cycle Design Standards and fully implemented in accordance with these standards and made operational before the first occupation of the development, and permanently retained thereafter.

Reason: To promote sustainable patterns of transport, in accordance with Section 9 of the National Planning Policy Framework (2023) and policy T5 of the London Plan (2021).

8. Cycle Management Plan

Details of a Cycle Management Plan shall be submitted to and approved in writing by the local planning authority prior to the first occupation or use of the flats hereby approved. The development shall be implemented only in accordance with these approved details and retained permanently thereafter.

Reason: To promote sustainable patterns of transport, in accordance with Section 9 of the National Planning Policy Framework (2023) and policy T5 of the London Plan (2021).

9. Travel Plan

An updated Green Travel Plan designed to manage the transport needs of the occupiers of the development, including measures to minimise car useage and promote alternative modes of transport, shall be submitted to the Local Planning Authority before the first occupation of the development, and the approved Green Travel Plan shall be fully implemented in compliance with the approved document.

Reason: To promote sustainable patterns of transport to safeguard the living and working conditions of local people and in the interest of highway and pedestrian safety, in accordance with section 9 of the National Planning Policy Framework (2023), policies T2 and T4 of the London Plan (2021) and policies 1.1 (f) and 1.1(g) of the Ealing Development (Core) Strategy 2026.

10. Delivery/Servicing Plan

A delivery and servicing plan (DSP) for the different uses of the development detailing servicing arrangements, times and frequency and operational details shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development. The servicing of the development shall be operated strictly in accordance with the details so approved, shall be maintained as such thereafter and no change therefrom shall take place without the prior written consent of the Local Planning Authority obtained through the submission of a planning application.

Reason: To protect the living conditions of neighbouring properties in accordance with policies 1.1(e) (g) and 2.1 (c) and 2.10 of the Ealing Core Strategy (2012), policy 7.A of the Ealing Development Management Development Plan Document (2013), policies D6 and T4 of the London Plan (2021), and the National Planning Policy Framework (2023).

11. Deliveries/collections times

Deliveries to and collections, including waste, from the commercial units hereby approved shall only take place during the period 0700 – 1800 hrs on Monday to Saturday, at no times on Sunday and Public Holidays.

Reason: To protect the living conditions of neighbouring properties in accordance with policies 1.1(e) (g) and 2.1 (c) and 2.10 of the Ealing Core Strategy (2012), policy 7.A of the Ealing Development Management Development Plan Document (2013), policies D6 and T4 of the London Plan (2021), and the National Planning Policy Framework (2023).

12. Transport and/or commercial/industrial/cultural noise sources

Prior to commencement of the development (excluding demolition, initial site clearance and ground works), a noise assessment shall be submitted to the Council for approval in writing, of external noise levels from transport and industrial/ commercial/ cultural sources, having regard to the assessment standards of the Council's SPG10, including reflected and re-radiated noise where appropriate. Details shall include the sound insulation of the building envelope including glazing specifications (laboratory tested including frames, seals and any integral ventilators, approved in accordance with BS EN ISO 10140-2:2010) and of acoustically attenuated mechanical ventilation and cooling as necessary (with air intake from the cleanest aspect of the building and details of self-noise) and resulting internal noise levels, specified in SPG10. Best practicable mitigation measures shall also be implemented in external amenity spaces to achieve criteria of BS8233:2014. The approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: In the interests of the internal environment of the development and living conditions of future occupiers of the site in accordance with policy 1.1(j) of the Ealing Core Strategy (2012), policies 7A and 7B of the Ealing Development Management Development Plan Document (2013), policy D14 of the London Plan (2021), the National Planning Policy Framework (2023) and Ealing Interim guidance SPG 10 'Noise and Vibration'.

13. Separation of noise sensitive rooms in neighbouring flats

Prior to commencement of the development, (excluding demolition, initial site clearance and ground works), details shall be submitted to the Council for approval in writing, of an enhanced sound insulation value of at least 5dB above the maximum Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/uses in adjoining dwellings, namely, kitchen/living/dining/bathroom above/below/adjoining bedroom of separate dwelling. The assessment and mitigation measures shall be based on standards of the Council's SPG10 and the criteria of BS8233:2014. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: In the interests of the internal environment of the development and living conditions of future occupiers of the site, in accordance with policy 1.1(j) of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management Development Plan Document (2013), policy D14 of the London Plan (2021), the National Planning Policy Framework (2023) and Interim guidance SPG 10 'Noise and Vibration'.

14. Separation of commercial/industrial and communal uses and facilities from dwellings

Prior to commencement of the development, (excluding demolition, initial site clearance and ground works), details shall be submitted to the Council for approval in writing, of an enhanced sound insulation value of at least 10dB/ 15dB/ 20dB, as necessary above the Building Regulations value for residential use, of the floor/ ceiling/ walls separating dwellings from commercial/ industrial and communal areas and facilities. Where non-domestic noise emissions include characteristic features, the Noise Rating level should not exceed NR20 Leq 5mins inside habitable rooms. Details shall include the installation method and materials of separating structures and, where necessary, additional mitigation measures and the resulting sound insulation value and internal sound level. The assessment and mitigation measures shall be based on standards and noise limits of the Council's SPG10 and BS8233:2014. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site/ adjacent dwellings/ noise sensitive premises is not adversely affected by noise in accordance with policy 1.1(j) of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management Development Plan Document (2013), policy D14 of the London Plan (2021), the National Planning Policy Framework (2023) and Interim guidance SPG 10 'Noise and Vibration'.

15. Noise insulation to Lifts

Prior to commencement of the development, (excluding demolition, initial site clearance and ground works), details shall be submitted to the Council for approval in writing, of enhanced sound insulation of lifts and lift shafts, in accordance with noise limits specified in Table 5 BS8233:2014. Details shall include mitigation measures and the resulting sound insulation value and internal sound/rating level. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: In the interests of the living conditions of the future occupiers of the site in accordance with policy 1.1(j) of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management Development Plan Document (2013), policy D14 of the London Plan (2021), the National Planning Policy Framework (2023) and Interim guidance SPG 10 'Noise and Vibration'.

16. External noise from machinery, equipment, extract/ventilation ducting, mechanical installations

a) Prior to commencement of the development (excluding demolition, initial site clearance and ground works), details shall be submitted to the Council for approval in writing, of the external rating noise level emitted from plant/ machinery/ equipment in any one location and mitigation measures as appropriate, as measured at/ calculated to the nearest and most affected noise sensitive premises. The measures shall ensure that the external rating noise level LAeq emitted from plant/ machinery/ equipment will be lower than the lowest existing background sound level LA90 by 10dBA at the most noise sensitive receiver locations at the development site and in surrounding premises. The assessment shall be made in accordance with BS4142:2014, with all machinery in any one location operating together at maximum capacity. Details of any noise mitigation measures shall be submitted for approval.

b) A post installation sound assessment shall be carried out where required to confirm compliance with the noise criteria and additional steps to mitigate noise shall be taken, as necessary. Approved details shall be implemented prior to occupation/ use of plant/ machinery/ equipment and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment, in accordance with Policy 1.1(j) of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management Development Plan Document (2013), policy D14 of the London Plan (2021), the National Planning Policy Framework (2023) and Interim guidance SPG 10 'Noise and Vibration'.

17. Anti- vibration mounts and silencing of machinery etc.

Prior to use, machinery, plant or equipment/ extraction/ ventilation system and ducting at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

Reason: In the interests of the internal environment of the development and living conditions of future occupiers of the site and occupiers of nearby properties, in accordance with policy 1.1(j) of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management Development Plan Document (2013), policy D14 of the London Plan (2021), the National Planning Policy Framework (2023) and Interim guidance SPG 10 ‘Noise and Vibration’.

18. Use of industrial/commercial units

Prior to occupation of commercial/industrial units at the development, details shall be submitted to the Council for approval in writing of hours of use, times and frequency of activities, servicing details, deliveries and collections, vehicle movements, silent reversing and loading/unloading methods, location of loading bays, etc. The assessment shall be based on standards of the Council’s SPG10. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise, fumes, etc. in accordance with policy 1.1(j) of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management Development Plan Document (2013), policy D14 of the London Plan (2021), the National Planning Policy Framework (2023) and Interim guidance SPG 10 ‘Noise and Vibration’.

19. Demolition Method Statement and Construction Management / Logistics Plan

Prior to commencement of the development, a demolition method statement/ construction management plan shall be submitted to the Council for approval in writing. Details shall include control measures for:
- noise and vibration (according to Approved CoP BS 5228-1 and -2:2009+A1:2014),
- dust (according to Supplementary Planning Guidance by the GLA (2014) for The Control of Dust and Emissions during Construction and Demolition),
- lighting ('Guidance Note 01/20 For The Reduction Of Obtrusive Light' by the Institution of Lighting Professionals),
-vehicle access and delivery locations,
- hours of work and all associated activities audible beyond the site boundary restricted to 0800-1800hrs Mondays to Fridays and 0800 -1300 Saturdays (except no work on public holidays),
- neighbour liaison, notifications to interested parties and considerate complaints procedure,
- public display of contact details including accessible phone numbers for persons responsible for the site works for the duration of the works, in case of emergencies, enquiries or complaints.

Reason: To protect the amenity of neighbouring occupiers and to ensure adequate highway and site safety in accordance with policies 1.1(e), 1.1(j) and 2.1(c) of the Ealing Core Strategy (2012), policies SI1, T4, T6 and D14 of the London Plan (2021), the National Planning Policy Framework (2023), 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 and to ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems.

20. Sustainable Design and Construction Standards

A) Upon the first occupation of each residential unit within the approved development, the approved dwellings shall incorporate sustainability measures as detailed in the approved Sustainability Statement Addendum by Twin & Earth (October 2021) and the Sustainability Statement Addendum by Twin & Earth (August 2023);

B) Upon the first use of each non-residential unit within the approved development, the approved non-residential spaces shall incorporate sustainability measures as detailed in the approved Sustainability Statement Addendum by Twin & Earth (October 2021) and the Sustainability Statement Addendum by Twin & Earth (August 2023).

Reason: In the interest of addressing climate change and to secure sustainable development in accordance with policies SI1, SI2, SI3, SI4, SI5 and SI7 of the London Plan (2021), policies LV5.2 and 7A of Ealing's Development Management DPD 2013, and policies 1.1(k) and 1.2(f) of Ealing's Development (Core) Strategy (2012).

21. Water Efficiency

A. Prior to occupation of each residential unit within the development, the approved dwellings shall incorporate and maintain water saving measures that will meet water efficiency standards with a maximum water use target of 105 litres of water per person per day.

B. Prior to occupation of each non-residential unit within the development, the approved non-residential unit shall incorporate and maintain water saving measures that will reduce the water consumption as detailed in the approved Sustainability Statement Addendum by Twin & Earth (October 2021) and the Sustainability Statement Addendum by Twin & Earth (August 2023).

Reason: To ensure the sustainable use of water, in accordance with the approved sustainability statement and policy SI5 of the London Plan (2021).

22. Energy & CO2 Emissions

a) Prior to construction completion and occupation, the Development shall implement and maintain, and in the case of energy generation equipment confirm as operational, the approved measures to achieve an overall sitewide reduction in regulated CO_2 emissions of at least 70.41% (equating to 77.35 tonnes of CO_2 per year) beyond Building Regulations Part L 2021 and using SAP 10.2 emission factors. These CO_2 savings shall be achieved through the Lean, Clean, Green Energy Hierarchy as detailed in the approved Energy Statement prepared by Twin & Earth in August 2023 (v1) including:

   i. Lean, energy efficiency design measures to achieve an annual reduction of at least 6.25% equating to at least 6.46 tonnes in regulated carbon dioxide (CO_2) emissions over BR Part L 2021 (using SAP 10.2 conversion factors) for the residential development, and at least 20.69%, equating to at least 1.33 tonnes, over Part L 2021 for the non-residential space (using SAP 10.2 conversion factors).

   ii. Green, renewable energy equipment including the incorporation of photovoltaic panels with a combined total capacity of at least 15.3 kWp, and Air Source Heat Pumps to achieve an annual reduction of at least 63.31%, equating to 69.55 tonnes, in regulated carbon dioxide (CO_2) emissions over Part L 2021 (using SAP 10.2 conversion factors).

   iii. Seen, heat and electric meters installed to monitor the performance of the PV and the carbon efficiency (SCOP) of the heat pump system (including the heat generation and the electrical parasitic loads of the heat pumps), in line with the Council's monitoring requirements.

b) Prior to Installation, details of the proposed renewable energy equipment, and associated monitoring devices required to identify their performance, shall be submitted to the Council for approval. The details shall include the communal heat distribution network schematics, the exact number of heat pumps, the heat pump thermal kilowatt output, heat output pipe diameter(s), parasitic load supply schematics, monthly energy demand profile, and the exact number of PV arrays, the kWp capacity of each array, the orientation, pitch and mounting of the panels, and the make and model of the panels. The name and contact details of the renewable energy installation contractor(s), and if different, the commissioning electrical or plumbing contractor, should be submitted to the Council prior to installation.

c) On completion of the installation of the renewable energy equipment copies of the MCS certificates and all relevant commissioning documentation shall be submitted to the Council.

d) The development shall incorporate the overheating mitigation measures detailed in the dynamic Overheating Analysis. Any later stage version shall be compliant with CIBSE guidance Part O (TM59/Guide A) and modelled against the TM49 DSY1 (average summer) weather data files, and the more extreme weather DSY2 (2003) and DYS3 (1976) files for TM59 criteria (a) and (b).

e) Within three months of the occupation/first-use of the development a two-page summary report prepared by a professionally accredited person comparing the "as built stage" TER to BER/DER

figures against those in the final energy strategy along with the relevant Energy Performance Certificate(s) (EPC) shall be submitted to the Council for approval.

Reason: In the interest of addressing climate change and to secure environmentally sustainable development in accordance with policies SI2 and SI3 of the London Plan (2021), and the relevant guidance notes in the GLA Energy Assessment Guidance 2020, policies LV5.2 and 7A of Ealing's Development Management DPD 2013, and policies 1.1(k) and 1.2(f) of Ealing's Development (Core) Strategy 2012.

23. Post-construction energy equipment monitoring

In order to implement Ealing Council DPD policy E5.2.3 (post-construction energy equipment monitoring), and key parts of London Plan policy SI2 ("be Seen"), the developer shall:

a) Enter into a legal agreement with the Council to secure a S106 financial contribution, or alternative financial arrangement, for the post-construction monitoring of the renewable/low carbon technologies to be incorporated into the development and/or the energy use of the development as per energy and CO_2 Condition(s).
b) Upon final construction of the development, or relevant phases of the development, and prior to occupation, the agreed suitable devices for monitoring the performance/efficiency of the renewable energy equipment shall be installed. The monitored data shall be automatically submitted to the Council at daily intervals for a period of five years from occupation and full operation of the energy equipment. The installation of the monitoring devices and the submission and format of the data shall be carried out in accordance with the Council's approved specifications as indicated in the Automated Energy Monitoring Platform (AEMP) information document. The developer must contact the Council's chosen AEMP supplier (Energence Ltd) on commencement of construction to facilitate the monitoring process.
c) Upon final completion of the development and prior to occupation, the developer must submit to the Council proof of a contractual arrangement with a certified contractor that provides for the ongoing, commissioning, maintenance, and repair of the renewable/low-carbon energy equipment for a period of five years from the point that the building is occupied and the equipment fully operational. Any repair or maintenance of the energy equipment must be carried out within one month of a performance problem being identified.

Reason: To monitor the effectiveness and continued operation of the renewable/low carbon energy equipment in order to confirm compliance with energy policies and establish an in-situ evidence base on the performance of such equipment in accordance with London Plan (2021) policy SI2 ("Be Seen" stage of the energy hierarchy), Ealing's Development (Core) Strategy 2026 (3rd April 2012) and Development Management DPD policy 5.2, E5.2.3, and Policy 2.5.36 (Best Practice) of the Mayor's Sustainable Design & Construction SPG.

24. Post-construction energy use monitoring ("be Seen")

In order to demonstrate compliance with the 'be seen' post-construction monitoring requirement of Policy SI 2 of the London Plan, the legal Owner shall at all times and all in all respects comply with the energy monitoring requirements set out in points a, b and c below. In the case of non-compliance the legal Owner shall upon written notice from the Local Planning Authority immediately take all steps reasonably required to remedy non-compliance.

a) Within four weeks of planning permission being issued by the Local Planning Authority, the Owner is required to submit to the GLA accurate and verified estimates of the 'be seen' energy performance indicators, as outlined in Chapter 3 'Planning stage' of the GLA 'Be seen' energy monitoring guidance document, for the consented development. This should be submitted to the GLA's monitoring portal in accordance with the 'Be seen' energy monitoring guidance.
b) Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the building(s) being occupied (or handed over to a new legal owner, if applicable), the legal Owner is required to provide updated accurate and verified estimates of the 'be seen' energy performance indicators for each reportable unit of the development, as per the methodology outlined in Chapter 4 'As-built stage' of the GLA 'Be seen' energy monitoring guidance. All data and supporting evidence should be uploaded to the GLA's monitoring portal. In consultation with the Council's chosen Automated Energy Monitoring Platform provider the owner should also confirm that suitable monitoring devices have been installed and maintained for the monitoring of the in-use energy performance indicators, as outlined in Chapter 5 'In-use stage' of the GLA 'Be seen' energy monitoring guidance document.
c) Upon completion of the first year of occupation following the end of the defects liability period (DLP) and for the following four years, the legal Owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each reportable unit of the development as per the methodology outlined in Chapter 5 'In-use stage' of the GLA 'Be seen' energy monitoring guidance document. All data and supporting evidence should be uploaded to the GLA's monitoring portal. This condition will be satisfied after the legal Owner has reported on all relevant indicators included in Chapter 5 'In-use stage' of the GLA 'Be Seen' energy monitoring guidance document for at least five years.
d) In the event that the in-use evidence submitted shows that the as-built performance estimates have not been or are not being met, the legal Owner should use reasonable endeavours to investigate and identify the causes of underperformance and the potential mitigation measures and set these out in the relevant comment box of the 'be seen' spreadsheet. Where measures are identified, which it would be reasonably practicable to implement, an action plan comprising such measures should be prepared and agreed with the Local Planning Authority. The measures approved by the Local Planning Authority should be implemented by the legal Owner as soon as reasonably practicable.

Reason: In order to ensure that actual operational energy performance is minimised and demonstrate compliance with the 'be seen' post-construction monitoring requirement of Policy SI 2 of the London Plan.

25. Whole Life-Cycle Carbon Assessment

a) Prior to the Commencement of Construction (excluding demolition, site clearance, site investigation and site remediation) a Whole Life Carbon Assessment shall be submitted to the Council for approval. The Assessment shall be compliant with policy SI2(F) of the London Plan and in line with the GLA (March 2022) guidance. The Development shall meet the GLA benchmark targets and seek to achieve the aspirational target.
b) Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the building(s) being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development should submit the post-construction Whole Life-Cycle Carbon (WLC) Assessment to the GLA at: **ZeroCarbonPlanning@london.gov.uk**. The owner should

use the post construction tab of the GLA's WLC assessment template and this should be completed accurately and in its entirety, in line with the criteria set out in the GLA's WLC Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.

c) The Development shall implement the measures identified in the WLC Assessment prepared by Twin & Earth in August 2023 (v1). Modules A1-A5 should achieve 736 $KgCO_2e/m^2$, and B1-C4 (excluding B6/B7) 508 $KgCO_2e/m^2$, with a total carbon emissions baseline scenario (over 60 years) of 927 $KgCO_2e/m^2$ (including sequestration benefits).

Reason: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI2(F) of the London Plan.

26. Security features

Prior to first occupation of the development, the development shall achieve Secured by Design accreditation.

Reason: To ensure that the adequate security features are incorporated into the development that are appropriate to the overall design of the buildings and are adequate to promote safety and security, in accordance with policy D3 of the London Plan (2021), policy 1.1(e) and 1.1(h) of the Ealing adopted Development (or Core) Strategy 2012; and policies LV7.3 and 7B of the Ealing Development Management DPD (2013).

27. Ventilation Strategy

Prior to the commencement of the superstructure of the development hereby approved, a Ventilation Strategy Report shall be submitted to and approved by the Local Planning Authority. The report will contain details for providing fresh air ventilation, the supply should be located away from sources of local pollution.
The report shall also include the following information:

a) Details and locations of the ventilation intake locations of all floors

b) Details and locations of ventilation extracts locations of all floors

The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications and shall be the responsibility of the primary owner of the property. Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

Reason: To minimise exposure to existing poor air quality and provide a suitable internal living environment for future occupiers, in accordance with policy SI 1 of the London Plan 2021, policy 1.1(j) of the Ealing Development Strategy 2026 DPD (2012); and policy 7A of the Ealing Development Management DPD (2013).

28. Air Quality and Dust Management Plan

Prior to commencement of any works onsite, an Air Quality and Dust Management Plan (AQDMP) shall be submitted for the approval of the Local Planning Authority. The AQDMP will be based on the findings of Air Quality (Dust) Risk Assessment provided in the Air Quality Assessment report titled "Statement of Conformity: Land at Stanley Road, Ealing" dated August 2023. The AQDMP will provide a scheme for air pollution mitigation measures based on the findings of the Air quality report. The plan shall include:

a) Dust Management Plan for Demolition Phase
b) Dust Management Plan for Construction Phase

The applicant shall contact the council's pollution technical team about the installation of air quality monitors on site and always provide direct access to monitoring data for the duration of the project. The monitors shall be installed on site at least 4 weeks prior to any site clearance and demolition to provide baseline data and shall be maintained on site until first occupation of the development hereby approved. Direct access to monitoring data will be always provided. The Air Quality Dust Management Plan shall be implemented on commencement of any works on site and the site shall be managed in accordance with the approved plan for the duration of the construction.

Reason: In the interests of the amenity of adjoining occupiers and to minimise particulate matter associated with construction works in accordance with policies 1.1 (e) (f) (j) of the Ealing Development (Core) Strategy 2012, policy 7A of the Ealing Development Management Development Plan (2013) and policy SI1 of the London Plan(2021); and National Planning Policy Framework (2021).

29. Non-Road Mobile Machinery

All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at https://nrmm.london/**.**

Reason: To safeguard adjoining occupiers of the development against unacceptable noise, disturbance and emissions, policies 1.1(j) of the Ealing Development (Core) Strategy (2012), Local Variation policy 3.5 and policy 7A of Ealing's Development Management DPD (2013) and policy SI1 of the London Plan(2021) and National Planning Policy Framework (2021).

30. Diesel Generators

Prior to their operation, details on all new installed diesel generators demonstrating compliance with a minimum NOx emissions standard of 150mg/Nm-3 (at 5% O2) must be submitted and approved in writing by the Local Planning Authority. The details must include the results of NOx emissions testing of the diesel fuelled generator units by an accredited laboratory, emissions concentrations expressed at specific reference conditions for temperature, pressure, oxygen and moisture content under normal operating conditions. Where any combustion plant does not meet the relevant standard, it should not be operated without the fitting of suitable NOx abatement equipment or technology. Evidence of installation shall be required where secondary abatement is required to meet the NOx Emission standard 150mg/Nm-3 (at 5% O2). The emergency plant and generators hereby permitted may be operated only for essential testing, except when required in an emergency situation.

Reason: To ensure Ealing Council meets its obligations to deliver air quality objectives for NO2 in accordance with London Local Air Quality Management (LLAQM), and to limit PM2.5 (fine particulates) to safeguard public health and well-being and external amenity of nearby sensitive receptors.

31. Site Investigation

Prior to the commencement of any works on site (other than demolition and site clearance), and based on an approved conceptual site model contained within an approved Geo-Environmental Phase 1 Desk Study by WSP (November 2019) a site investigation shall investigate the site and any previously inaccessible ground. The site conceptual model shall be amended based on the findings of the intrusive site investigation and the risks to identified receptors up dated. This assessment must be undertaken by a competent person, and shall assess any contamination on the site, whether or not it originates on the site. The findings of the site investigation and proposed remedial options shall be submitted to the Local planning authority for approval in writing prior to any remedial works commencing and any development works commencing.

Reason: To ensure the land contamination issues are addressed in accordance with policy1.1 (j) of the adopted Local Development Framework (Core Strategy 2012) and Ealing Local Variation to London Plan Policy 5.21 of the Ealing Development Management Development Plan 2013.

32. Remediation Scheme

A detailed remediation scheme to bring the site to a condition suitable for the intended use shall be submitted to and subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development, other than that required to carry out remediation works.

Reason: To ensure the land contamination issues are addressed in accordance with policy1.1 (j) of the adopted Local Development Framework (Core Strategy 2012), and Ealing Local Variation to London Plan Policy 5.21 of the Ealing Development Management Development Plan 2013.

33. Verification Report

Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority. The verification report submitted shall be in accordance with the latest Environment Agency guidance and industry best practice.

Reason: To ensure the land contamination issues are addressed in accordance with policy1.1 (j) of the adopted Local Development Framework (Core Strategy 2012) and Ealing Local Variation to London Plan Policy 5.21 of the Ealing Development Management Development Plan 2013.

34. External Lighting

External artificial lighting at the development shall not exceed lux levels of vertical illumination at neighbouring premises that are recommended by the Institution of Lighting Professionals in the ‘Guidance Notes For The Reduction Of Light Pollution 2011’. Lighting should be minimized and glare and sky glow should be prevented by correctly using, locating, aiming and shielding luminaires, in accordance with the Guidance Notes.

Reason: In the interests of the living conditions of occupiers of nearby properties and future occupiers of the site, and to protect ecological initerests, in accordance with policy 1.1 (j) of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management Development Plan Document (2013), policy D6 of the London Plan (2021), and the National Planning Policy Framework (2023).

35. No masts/satellite dishes or external equipment

No microwave masts, antennae or satellite dishes or any other plant or equipment shall be installed on any elevation of the buildings hereby permitted without the prior written permission of the Local Planning Authority obtained through the submission of a planning application.

Reason: To safeguard the appearance of the buildings and the locality in the interests of visual amenity policies 1.1 (h) (g), 1.2(h), 2.1(c) and 2.10 of the Ealing Core Strategy (2012), policies ELV 7.4, 7B and 7C of the Ealing Development Management Development Plan Document (2013), policies D4 and D5 of the London Plan (2021), section 7 and 12 of the National Planning Policy Framework (2023).

36. Refuse Storage

Each of the refuse and recycling storage facilities hereby approved for the residential element shall be implemented and operational before the first occupation of the flats they would serve, and permanently retained thereafter. The commercial unit(s) shall be provided with refuse storage to accord with the local planning authority standards prior to first occupation.

Reason: In the interests of the adequate disposal, storage and collection of waste and recycling, to protect the living conditions of occupiers of the area and in the interests of highway and pedestrian safety all in accordance with policies 1.1 (e) and 6.1 of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management Development Plan Document (2013), policy SI7 of the London Plan (2021) and the National Planning Policy Framework (2023).

37. Passenger Lifts

All passenger lifts serving the residential units hereby approved shall be fully installed and operational prior to the first occupation of the relevant core of development served by a passenger lift.
Reason: To ensure that adequate access is provided to all floors of the development for all occupiers and visitors including those with disabilities, in accordance with policy 1.1(h) of the Ealing Core Strategy (2012), policy D5 of The London Plan (2021), and the National Planning Policy Framework (2023).

38. Detailed Drainage Design

Prior to the commencement of the superstructure of the development hereby approved, a drainage strategy detailing any on and/or off-site drainage works shall be submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the approved strategy have been completed.

Reason: To ensure that sufficient capacity is made available to cope with additional demand in the interest of environmental conditions in the locality, in accordance with policy 1.1 (e), 1.2 (m) and 6.1 of the Ealing Core Strategy (2012), policies SI12 and SI13 of The London Plan (2021), and the National Planning Policy Framework (2023).

39. Drainage Maintenance Plan

Prior to the occupation of the development hereby approved, a maintenance plan/schedule for the proposed sustainable urban drainage system (SUDS) for the lifetime of the development shall be submitted to and approved by the Local Planning Authority.

Reason: To reduce flood risk in accordance with the National Planning Policy Framework (2023) and policies SI12 and SI13 of the London Plan (2021).

40. Surface Water

Prior to occupation of any dwellings on the site the applicant shall confirm in writing to Thames Water that either:

a) all surface water network upgrades required to accommodate the additional flows from the development have been completed; or

b) a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

Reason: The development may lead to flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents.

41. Piling Method Statement

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. To ensure the integrity of underground water and sewerage utility infrastructure is not affected, in accordance with policy 1.1 (e), 1.2 (m) and 6.1 of the Ealing Core Strategy (2012), policy SI5 of The London Plan (2021), and the National Planning Policy Framework (2023).

42. Former Lifetime homes standards

90% of the approved residential dwellings shall be designed and constructed to meet Approved Document M (Volume 1: Dwellings), Part M4(2)(Accessible and adaptable dwellings) of Building Regulations 2015, or other such relevant technical requirements in use at the time of the construction of the development.

Reason: To ensure that the development is adaptable, flexible, convenient and appropriate to the changing needs of the future occupiers, in accordance with policy D7 of the London Plan (2021); and policy 1.1(h) of the Ealing Development (or Core) Strategy 2012.

43. Former Adaptable wheelchair housing

10% of the approved residential dwellings shall be designed and constructed to meet Approved Document M (Volume 1: Dwellings), Part M4(3) (Wheelchair user dwellings) of Building Regulations 2015, or other such relevant technical standards in use at the time of the construction of the development.

Reason: To ensure the provision of wheelchair housing in a timely fashion that would address the current unmet housing need; produce a sustainable mix of accommodation; and provide an appropriate choice and housing opportunity for wheelchair users and their families, in accordance with the objectives of policy D7 of the London Plan (2021); and policy 1.1(h) of the Ealing Development (or Core) Strategy 2012.

44. Tree Monitoring Plan

The development hereby approved shall be constructed in accordance with a suitable Tree Monitoring Program.

(a) Prior to the commencement of development (including ground works and site clearance), the following shall be submitted to and approved by the Local Planning Authority:

A tree monitoring program to include:
- Confirmation of who shall be the lead arboriculturalist for the development.
- Confirmation of the Site Manager, key personnel, their key responsibilities and contact details.
- Details of induction procedures for all personnel in relation to Arboricultural matters.
- A detailed timetable of events for arboricultural supervision concerning all tree protection measures within the approved Tree Protection Plan, including:
  - Prestart meeting with an Ealing Council Tree Officer
  - Initial implementation/installation of the tree protection measures
  - Approved incursions in to construction exclusion zones
  - Final removal of the tree protection measures
- Procedures for dealing with non-approved incursions into the construction exclusion zones as detailed in the approved Arboricultural Method Statement .

(b) Within three months of first use of the development hereby approved, a report containing the following details shall be submitted to and approved by the Local Planning Authority:
- Results of each site visit by the lead arboriculturist with photos attached.
- Assessment of the retained and planted trees including any necessary remedial action as a result of damage incurred during construction.

Reason: To ensure appropriate tree protection in the interests of protecting the visual amenity of the area, contributing to the quality and character of London's environment, air quality and adapting to and mitigating climate change in accordance with policies G4, G5 and G7 of the London Plan (2021), policy 5.10 of Ealing's Development Management DPD and Ealing's SPG 9 - Trees and Development Guidelines.

45. Tree Planting and Soil Rooting Volume

Prior to the commencement of any works on site, a suitable scheme of proposed tree planting and tree pits shall be submitted to and approved by the Local Planning Authority. The scheme shall include the following comprehensive details of all trees to be planted:

- Full planting specification - tree size, species, the numbers of trees and any changes from the original application proposals.
- Locations of all proposed species.
- Comprehensive details of ground/tree pit preparation to include:
  - Plans detailing adequate soil volume provision to allow the tree to grow to maturity
  - Engineering solutions to demonstrate the tree will not interfere with structures (e.g. root barriers/deflectors) in the future
  - Staking/tying method(s).
  - Five year post planting maintenance and inspection schedule.

All tree planting must be carried out in full accordance with the approved scheme in the nearest planting season (1st October to 28th February inclusive). The quality of all approved tree planting should be carried out to the levels detailed in British Standard 8545, Trees: from nursery to independence in the landscape - Recommendations.

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 (1st October to 31st March inclusive) with a tree/s of the same size, species and quality as previously approved.

Reason: To ensure appropriate tree protection in the interests of protecting the visual amenity of the area, contributing to the quality and character of London's environment, air quality and adapting to and mitigating climate change in accordance with policies G4, G5 and G7 of the London Plan (2021), policy 5.10 of Ealing's Development Management DPD and Ealing's SPG 9 - Trees and Development Guidelines.

46. Electric Vehicle Charging

The 5 disabled car parking spaces hereby approved shall be fully marked out and the provision of at least one electric vehicle charging point space shall be made prior to the first occupation of the development hereby approved, and this car parking space together with the associated access and internal carriageway shall be kept continuously available for the satisfactory operation of the parking area and shall not be used for any other purpose.

Reason: To reduce emissions of greenhouse gases and to improve local air quality in the interests of health, in accordance with policies SI1 and T6 of the London Plan (2021), policies 1.1(e), 1.1(f), 1.1(j) and 1.2(k) of Ealing's adopted Development (or Core) Strategy 2012, and the National Planning Policy Framework (2023).

47. Play equipment

Details of design, layout and provision of any play equipment within the play areas proposed within the development site shall be submitted to and approved in writing by the local planning authority prior to the first occupation of the development hereby approved. The development shall be implemented only as approved and retained thereafter.

Reason: To ensure that there is suitable provision for childrens play facilities within the site in accordance with policies 1.1 (e), 2.1 (c) of the Ealing Core Strategy (2012), policies ELV 3.5 and 7D of

the Ealing Development Management Development Plan Document (2013), policy S4 of the London Plan (2021), the London Plan SPG on Chidren's Play and Recreation, and the National Planning Policy Framework (2023).

48. Screening of Terraces

Details of screening to terraces within the development shall be submitted to and approved in writing by the local planning authority prior to the first occupation or use of the flats. This screening shall be implemented only as approved and retained thereafter.

Reason: To protect the amenity of occupiers of dwellings within the development in accordance with policies 7A and 7B of the Ealing Development Management Development Plan Document (2013), and the National Planning Policy Framework (2023).

49. Ecology

Prior to commencement of development on the site the recommendations for ecological enhancements set out in the approved Preliminary Ecological Appraisal by the Ecology Consultancy (November 2019) and the Preliminary Ecological Appraisal (PEA) Statement of Conformity by Temple Group (August 2023) shall be fully implemented.

Reason: To support ecology in accordance with Section 15 of the National Planning Policy Framework (2021), policy G6 of the London Plan (2021), policy 5.11 of the Adopted Ealing Development Management DPD (2013) and policy 5.4 of the Adopted Ealing Development (Core) Strategy 2012.

50. Fire Safety

The development shall be implemented to comply with the submitted Planning Fire Safety Statement by Hilson Moran (August 2023).

Reason: In the interests of the safety of occupiers of the dwellings hereby approved and to ensure that the development incorporates the necessary fire safety measures in accordance with Policies D5 and D12 of the London Plan (2021).

51. Circular Economy

a) Prior to commencement of construction a Circular Economy (CE) statement shall be submitted to the Council for approval that is in line with the GLA CE guidance (March 2022). The Statement should include a CE compliance table that lists the commitments and targets proposed to meet the minimum levels required by London Plan policy SI7.
b) Prior to completion of construction of the permitted development a Circular Economy Statement Post Completion Report should be completed accurately and in its entirety in line with the GLA's Circular Economy Statement Guidance (or equivalent alternative Guidance as may be adopted). This should be submitted to the GLA at: CircularEconomyLPG@london.gov.uk, along with any supporting evidence as per the guidance. The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation.

c) Specific commitments detailed in the Circular Economy statement produced by Twin & Earth in October (v2), or any later approved version, and accompanying Logistic Plans, should be implemented including; diverting 95% of construction waste from landfill, putting 95% of excavation materials to beneficial on-site use, and supporting the London Plan target of diverting 65% of Operational Waste from landfill by 2030.

Reason: In the interests of sustainable waste management and in order to maximise the appropriate re-use and recycling of materials in line with London Plan Policy D3 (Optimising site capacity), SI7 (Reducing waste), SI2 (Minimising greenhouse gas emissions).

52. Digital Connectivity

Prior to commencement of the superstructure, detailed plans shall be submitted to and approved in writing by the local planning authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. The development shall be carried out in accordance with these plans and maintained as such in perpetuity.

Reason: To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness in accordance with Policy SI6 of London Plan (2021).

53. Parking Design and Management Plan

Prior to the first occupation of the development a Parking Design and Management Plan for the development shall be submitted to and approved in writing by the Local Planning Authority. This Plan should demonstrate how a further 7% of dwellings could be provided with a disabled person parking bay as and when demand arises. The development shall be operated strictly in accordance with the details so approved, shall be maintained as such thereafter and no change therefrom shall take place without the prior written consent of the Local Planning Authority obtained through the submission of a planning application.

Reason: In the interests of the accessibility of occupiers of the dwellings in accordance with policies 1.1(e) (g) and 2.1 (c) and 2.10 of the Ealing Core Strategy (2012), policy 7.A of the Ealing Development Management Development Plan Document (2013), policies D6 and T6 of the London Plan (2021), and the National Planning Policy Framework (2023).

54. Industrial Use on Ground to Second Levels

Notwithstanding the provisions of Article 3 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (or any order revoking and re-enacting that Order with or without modification) or the provisions of The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, the ground, first and second floor levels of the development hereby approved shall only be occupied as industrial space as defined by Use Class E(g)(iii)), and not for any other use.

Reason: To ensure that the Council retains control over the quality and provision of any change of use, to ensure the future protection, viability and integrity of the wider Locally Significant Industrial Site in accordance with policies E4, E5, E6 and E7 of the London Plan (2021), policy 4A of the Ealing Development Management DPD (2013) and the National Planning Policy Framework (2023).

55. Nighttime Active Travel Zone (ATZ) Assessment

Prior to first occupation of the development, a Nighttime Active Travel Zone Assessment shall be carried out and submitted to the Local Planning Authority for approval in consultation with TfL and the development shall be implemented to accord with the approved document.

Reason: To promote sustainable patterns of transport and to safeguard the living and working conditions of local people and in the interest of highway and pedestrian safety, in accordance with section 9 of the National Planning Policy Framework (2023), policies T2 and T4 of the London Plan (2021) and policies 1.1 (f) and 1.1(g) of the Ealing Development (Core) Strategy 2026.

Informatives

The decision to grant planning permission has been taken having regard to the policies and proposals in National Planning Policy Guidance (2023), the London Plan (2021), the adopted Ealing Development (Core) Strategy (2012) and the Ealing Development Management Development Plan Document (2013) and to all relevant material considerations including Supplementary Planning Guidance:

National Planning Policy Framework (2023)

5 Delivering a sufficient supply of homes
8 Promoting healthy and safe communities
9 Promoting sustainable transport
11 Making effective use of land
12 Achieving well designed places
14 Meeting the challenge of climate change, flooding and coastal change

London Plan (2021)

D3 Optimising site capacity through the design-led approach
D4 Delivering good design
D5 Inclusive design
D6 Housing quality and standards
D8 Public realm
D9 Tall buildings
D10 Basement development
D11 Safety, security and resilience to emergency
D14 Noise
E11 Skills and opportunities for all
HC1 Heritage conservation and growth
HC3 Strategic and Local Views
HC6 Supporting the night-time economy
S4 Play and informal recreation
G5 Urban greening
G6 Biodiversity and access to nature
G7 Trees and woodlands
SD6 Town centres and high street
SI 1 Improving air quality
SI 2 Minimising greenhouse gas emissions
SI 3 Energy infrastructure
SI 4 Managing heat risk
SI 7 Reducing waste and supporting the circular economy
SI 8 Waste capacity and net waste self-sufficiency
SI 12 Flood risk management
SI 13 Sustainable drainage
T4 Assessing and mitigating transport impacts

T5 Cycling
T6 Car parking
T6.4 Hotel and leisure uses parking
T7 Deliveries, servicing and construction
T8 Aviation
T9 Funding transport infrastructure through planning

Supplementary Planning Guidance /Documents

Accessible London: achieving an inclusive environment
Mayor's Sustainable Design and Construction SPD April 2014
The Mayor's transport strategy
The Mayor's energy strategy and Mayor's revised Energy Statement Guidance April 2014
The London housing strategy
The London design guide (interim edition) (2010)
Draft shaping neighbourhoods: Children and young people's play and informal recreation (2012)
Planning for equality and diversity in London
Housing - Supplementary Planning Guidance (2012)
Housing SPG (March 2016)
Energy Planning (March 2016)
Children and Young People's Play and Informal Recreation SPG (September 2012)
Crossrail Funding: Use of Planning Obligations and the Mayoral Community Infrastructure Levy SPG (March 2016)
Affordable Housing & Viability- Supplementary Planning Guidance (2017)

Ealing's Development (Core) Strategy 2026 (2012)

1.1 Spatial Vision for Ealing 2026 (a), (b), (c), (d), (e), (f), (g), (h), (j) and (k)
1.2 Delivery of the Vision for Ealing (a), (c), (d), (e), (f), (g), (h), (k) and (m)
2.1 Development in the Uxbridge Road / crossrail corridor (a), (b), (c), (d), (e)
5.5 Promoting parks, local green space and addressing deficiency (b) and (c)
5.6 Outdoor sports and active recreation
6.1 Physical infrastructure
6.2 Social infrastructure
6.4 Planning Obligations and Legal Agreements

Ealing's Development Management Development Plan Document (2013)

Ealing local variation to London Plan policy 3.4: Optimising housing potential
Ealing local variation to London Plan policy 3.5: Quality and design of housing development
Policy 3A: Affordable Housing
Policy 4A: Employment Uses
Ealing Local variation to London Plan policy 4.7: Retail and town centre development
Ealing local variation to London Plan policy 5.2: Minimising carbon dioxide emissions
Ealing local variation to London Plan policy 5.10: Urban greening
Ealing local variation to London Plan policy 5.11: Green roofs and development site environs
Ealing local variation to London Plan policy 5.12: Flood risk management
Ealing local variation to London Plan policy 5.21: Contaminated land
Ealing local variation to London Plan policy 6.13: Parking
Policy 7A : Operational amenity
Ealing local variation to London Plan policy 7.3 : Designing out crime
Ealing local variation to London Plan policy 7.4 Local character
Policy 7B : Design amenity

Policy 7C : Heritage
Policy 7D : Open space

Draft Ealing Local Plan (Reg19) (2024)

Policy DAA: Design and Amenity
Policy D9: Tall Buildings
Policy HOU: Affordable Housing
Policy E3: Affordable Workspace
Policy E4: Land for Industry, Logistics and Services to Support London's Economic Function
Policy E6: Locally Significant Industrial Sites
Policy G4: Open Space
Policy G5: Urban Greening
Policy OEP: Operational Energy Performance
Policy WLC: Whole Life Cycle Carbon Approach
Policy SI7: Reducing Waste and Supporting the Circular Economy
Policy FLP: Funding the Local Plan

Adopted Supplementary Planning Documents

Sustainable Transport for New Development

Interim Supplementary Planning Guidance/Documents
SPG 3 Air quality
SPG 4 Refuse and recycling facilities (draft)
SPG 10 Noise and vibration

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'.
BS 5837:2012 Trees in relation to design, demolition and construction – Recommendations.

Ealing's Draft Local Plan (Regulation 18) November 2022
Policy DAA: Design and Amenity
Policy SSC: Small Sites Contribution

Ealing Housing Design Guidance (2022)

London Housing Design Standards LPG (2023)

In reaching the decision to grant permission, specific consideration was given to the impact of the proposed development on the amenities of neighbouring properties and the character of the area as a whole. Consideration was also given to highways, and the provision of adequate living conditions for occupiers. The proposal is considered acceptable on these grounds, and it is not considered that there

are any other material considerations in this case that would warrant a refusal of the application.

2. 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.

3. 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.

4. Calculation of building envelope insulation – Interim SPG10 advises:

a) A precise sound insulation calculation under the method given at BS EN12354-3**:** 2000, for the various building envelopes, including the use of the worst case one hour data (octave band linear noise spectra from 63 Hz – 4k Hz) by night and day, to arrive at the minimum sound reductions necessary to meet the SPG10 internal data.

b) Approved laboratory sound insulation test certificates for the chosen windows, including frames and seals and also for ventilators, in accordance with BS EN ISO 140-3: 1995 & BS EN ISO 10140-2:2010, to verify the minimum sound reductions calculated.

c) The SPG10 internal and external criteria to be achieved.

Aircraft noise affecting the site is at a contour level of worst mode one day equal to $L_{Aeq,16hr}$ 60 dB and LAeq,1hr 67dB by 2016. In calculating the insulation required the Lleq,1hr aircraft noise spectrum, shown at SPG10, shall be used, along with the spectrum for any other dominant noise sources. Under SPG10, the predicted LLeq,1hr aircraft noise exposure for the site at 2016 has to be used and combined with any other noise exposures. The spectra to be used are as follows:

Octave band centre frequency Hz	**dB Linear - $L_{eq,1hr}$**	
	60 dB contour	**57 dB contour**
63	73	70
125	72	69
250	69	66
500	67	64
1000	62	59
2000	57	54
4000	45	42
Total $L_{Aeq,1hr}$ for spectrum 16 – 8K Hz	**67**	**64**

5. Land contamination:

a) Reference should be made at all stages to appropriate current guidance and codes of practice; this would include:

i. Model Procedures for the Management of Land Contamination, CLR 11, Environment Agency, 2004
ii. Updated technical background to the CLEA model, Science Report: SC050021/SR3, Environment Agency, 2009
iii. LQM/CIEH Generic Assessment criteria for Human Health Risk Assessment (2nd Edition), 2009
iv. BS10175:2011 Investigation of potentially contaminated sites – Code of Practice

v. Secondary Model Procedure for the Development of Appropriate Soil Sampling Strategies for Land Contamination; Environment Agency, 2001
vi. Verification of Remediation of Land Contamination', Report: SC030114/R1, Environment Agency, 2010
vii. Planning Policy Statement 23: Planning and Pollution Control;
viii. PPS23 Annex 2: Development on Land Affected By Contamination;
ix. Guidance for the safe development of housing on land affected by contamination, NHBC & Environment Agency, 2008

- Clear site maps should be included in the reports showing previous and future layouts of the site, potential sources of contamination, the locations of all sampling points, the pattern of contamination on site, and to illustrate the remediation strategy.

- All raw data should be provided in a form that can be easily audited and assessed by the Council (e.g. trial pit logs and complete laboratory analysis reports)

- on-site monitoring for ground gases with any relevant laboratory gas analysis;
- Details as to reasoning, how conclusions were arrived at and an explanation of the decisions made must be included. (e.g. the reasons for the choice of sampling locations and depths).

b. Prior to commencement of construction and demolition works, involving materials containing asbestos, details of mitigation measures to control the release of asbestos fibres shall be submitted to this section for approval.

6. This permission does not grant consent for the display of external advertisements at this site which are subject to the Town & Country Planning Control of Advertisements (England) Regulations 2007, and which may need to obtain a separate advertisement consent from the local planning authority under those regulations.

7. Prior to commencement of construction and demolition works, involving materials containing asbestos, details of mitigation measures to control the release of asbestos fibres shall be submitted for the approval of the relevant Health and Safety Enforcement Officer.

8. Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. This is to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

   Recent legal changes under The Water Industry (Scheme for the Adoption of Private Sewers) Regulations 2011 mean that the sections of pipes you share with your neighbours, or are situated outside of your property boundary which connect to a public sewer are likely to have transferred to Thames Water ownership. Should your proposed building work fall within 3 metres of these pipes we recommend you contact Thames Water to discuss their status in more detail and to determine if a building over/near to agreement is required. You can contact Thames Water on 0845 850 2777 or for more information please visit our website.

9. A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via **www.thameswater.co.uk/wastewaterquality**.

10. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

11. In order to protect groundwater quality from further deterioration:

    - No infiltration based sustainable drainage systems should be constructed on land affected by contamination as contaminants can remobilise and cause groundwater pollution.
    - Piling or any other foundation designs using penetrative methods should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution.
    - Decommission of investigative boreholes to ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 109 of the National Planning Policy Framework.

    The applicant should refer to the following sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:
    - From www.gov.uk:
    - Our Technical Guidance Pages, which includes links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC
    (Environment Agency's Guiding Principles for Land Contamination) in the 'overarching documents' section
    - Use MCERTS accredited methods for testing contaminated soils at the site
    - From the National Planning Practice Guidance:
    - Land affected by contamination
    - British Standards when investigating potentially contaminated sites and groundwater:
    - BS5930:2015 Code of practice for site investigations;
    - BS 10175:2011+A1:2013 Code of practice for investigation of potentially contaminated sites;
    - BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points;
    - BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns and groundwater quality.)
    All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person. The competent person would normally be expected to be a chartered member of an appropriate body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.

12. Dust

Best Practicable Means (BPM) should be used in controlling dust emissions, in accordance with the Supplementary Planning Guidance by the GLA (2014) for The Control of Dust and Emissions during Construction and Demolition.

13. Dark smoke and nuisance

    No waste materials should be burnt on site of the development hereby approved.

14. Noise and Vibration from demolition, construction, piling, concrete crushing, drilling, excavating, etc.

    Best Practicable Means (BPM) should be used during construction and demolition works, including low vibration methods and silenced equipment and machinery, control and monitoring measures of noise, vibration, delivery locations, restriction of hours of work and all associated activities audible beyond the site boundary, in accordance with the Approved Codes of Practice of BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites. Noise and BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites: Vibration.

15. Fire Statement

    Prior to commencement of the superstructure of the development a fire statement, produced by a third party suitably qualified assessor, should be submitted to and agreed with the London Fire Brigade.

    Works to footway

16. The developer will be liable for the cost of repairing any damage to the footway around the perimeter of the site resulting from the construction work.

17. Street Numbers

    The applicant is advised that the Council is the street naming and numbering authority, and you will need to apply for addresses. This can be done by contacting the Street Naming and Numbering officer, prior to construction commencing. You will need to complete the relevant application form and supply supporting documentation e.g. site layout and floor plans so that official street naming and numbering can be allocated as appropriate. If no application is received the council has the authority to allocate an address. This also applies to replacement buildings and dwellings. Full details of how to apply along with guidance can be found **Street naming and numbering | Street naming and numbering | Ealing Council**