
Ref:	231285FUL
Address:	8 -10 Greenock Road, Acton, W3 8DU
Ward:	South Acton
Proposal:	Construction of a stepped building up to 18 storeys, comprising flexible industrial space (Class Eg(iii)/B2/B8), café (Class E) and 124 residential units, with associated off-street servicing areas and blue badge parking, refuse, cycle storage, plant rooms, landscaping and amenity space and associated works (Following demolition of existing buildings)
Drawing numbers:	AP00 P04 (Proposed Ground Floor); AP01 P04 (Proposed First Floor); AP02 P03 (Proposed Second Floor); AP03 P03 (Proposed Third Floor); AP04 P03 (Proposed Fourth – Eighth Floor); AP09 P03 (Proposed Ninth – Eleventh Floor); AP12 P03 (Proposed Twelfth Floor); AP13 P03 (Proposed Thirteenth – Fourteenth Floor); AP15 P02 (Proposed Fifteenth Floor); AP16 P02 (Proposed Sixteenth – Seventeenth Floor); APB1 P02 (Proposed Basement); APRF P02 (Proposed Roof Plan); 0250 P03 (Proposed North Elevation); 0250 P03 (Proposed East Elevation); 0253 P03 (Proposed West Elevation); 0900 rev D (Illustrative Landscape Plan); 2900 rev D (Ground Floor General Arrangement); 2901 rev E (Podium Level General Arrangement); 2902 rev E (Roof Terrace Level General Arrangement); 2903 rev D (Planting Strategy Plan rev D);
Supporting Documents:	Air Quality Assessment (IDOM, March 2023); Daylight, Sunlight and Overshadowing Assessment (HTA, March 2023); Design Access Statement (HTA, March 2023); Energy and Overheating Assessment (HTA, March 2023); Whole Life Carbon Assessment (March 2023); Wind Microclimate Assessment (Ecolytik, March 2023); Geo Environmental Assessment Phase 1 (IDOM, March 2023); London Plan Fire Statement (BB7, March 2023); Planning Gateway One Fire Statement (BB7, March 2023); Environmental Noise Assessment (IDOM, March 2023); Sustainability Statement (HTA, March 2023); Healthy Streets Transport Assessment (RPS, March 2023); Agent of Change Assessment (IDOM, March 2023); Drainage Strategy and SUDS Management Statement (IDOM, March 2023); Economic and Industrial Assessment (Iceni Projects, March 2023); Schedule of Accommodation (HTA, Ref: DVP-GRE); Statement of Community Involvement (London Communications Agency, March 2023); Visual Impact Appraisal (Neaves Urbanism, March 2023); Affordable Housing Statement (Newsteer, March 2023); Heritage Statement (GJHP, March 2023); Planning Statement (Newsteer, March 2023); Travel Plan (RPS, March 2023); Circular Economy Statement (HTA, March 2023); Delivery and Servicing Plan (RPS, March 2023); Outline

Construction Logistics Plan (March 2023); We Made That Study Analysis (DVP-GRE)

Type of Application: Major - Full Planning Application

Application Received: 23 March 2023

Report by: Joel Holland Turner

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) in order to secure the items set out in the Heads of Terms below:

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Executive Summary:

This application seeks full planning permission for the demolition of the existing industrial building and the construction of a mixed-use building, up to 18-storeys in height, with two shoulders that have heights of 12 and 15 storeys respectively. The scheme would accommodate, at ground, first and part second storey levels, industrial space with a cumulative floor space of 2,159sqm, which is an uplift from the existing 1,750sqm. At part second floor and above, the building would accommodate 124 residential homes.

The application site is located within a relatively isolated part of the South Acton LSIS, with most of the mixed-use developments that have been approved or under construction focused toward Bollo Lane. It should be noted that there is another application pending consideration within the vicinity of the site, known as 'Land Opposite Ravenswood Court, Stanley Road' (195284FUL).

Nevertheless, whilst the application site located in the southern portion of the LSIS, it is also within relative proximity to residential development that is focused around Stanley Road and Palmerston Road. The development follows the same principles of the co-location of industrial and residential uses, as afforded by Policy E7 of the London Plan, that the applications that are focused more toward Bollo Lane have followed.

The industrial spaces that are proposed as part of this scheme are considered to be well designed, with off-street servicing of these spaces provided by an internal road. This will allow larger vehicles to directly access the internal industrial spaces, making it attractive to a number of different occupiers that fall within the required E(g)(iii)/B2/B8 use classes that have been secured by condition.

Whilst a number of the mixed-use schemes within the LSIS have been brought forward as part of a superseded Hawkins/Brown Masterplan, the application site does not fall within the parameters set by this former Masterplan. In any case, the Council-initiated South Acton LSIS Masterplan provides more comprehensive guidance for development within the LSIS. The creation of this Masterplan provides in principle acceptance to the principle of development within this location, in line with Policy E7 of the London Plan, as well as Policy E6 of the Reg19 Draft Ealing Local Plan.

The 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. Whilst the development would be located within an area that would be the focus of the co-location of industrial and residential uses, it is noted within the report that the proposed 18 storeys would breach the recommended height limits in this location of 15 storeys.

In this instance, the Masterplan states that breaches of the height by a "limited margin may be acceptable", where certain criteria are fulfilled. The benefits of the scheme include requirement for Greenock Road to be brought to an adoptable standard, a new one-way system for the currently unadopted road, increased footpath widths, street trees, lighting and more defined loading and parking areas. In addition, the scheme would deliver additional open space beyond what has been identified within the Masterplan. This would enable the other sites that have been identified as suitable for co-location to also be brought forward at a future date. The mechanism for the delivery of this road will be achieved through Grampian-style obligations within the legal agreement (as outlined within the Heads of Terms), preventing the various stages of the development process from proceeding until certain milestones have been met. It is considered that the significant benefits that the scheme would deliver for the local area provide adequate justification for a marginal breach of the height limits outlined by the Masterplan.

The Agent of Change principle has been assessed and subject to the recommended conditions, it is considered that the industrial uses on surrounding sites and the residential uses proposed can reasonably co-exist. It is considered that the proposal would ensure that the introduction of more sensitive uses to the area would not compromise the continued operation and viability of the LSIS.

The proposed residential homes would all meet the requirements of Policy D6 of the London Plan, Policy LV3.5 and 7D of the Ealing Development Management DPD, the Mayors London Housing Design Standards LPG and Policy DAA of the Reg19 Draft Ealing Local Plan. Future residents would be afforded good quality living conditions, with compliant floor spaces, good access to daylight and sunlight and appropriate conditions have been recommended with respect to noise and air quality.

The scheme would deliver a good Affordable Housing offer, with a total provision of 36.5% by Habitable Room (34.7% by unit). The tenure split would be 60/40 in favour of the London Affordable Rent over Shared Ownership. Whilst this is below the objectives of Policy HOU of the Reg19 Draft Ealing Local Plan, which seeks a tenure split of 70/30 in favour of low rent housing products, it is consistent with the requirements of current adopted policy, which seeks a tenure split of 60/40.

The design of the development is considered to be of high quality. The existing buildings are generally poor and provide no architectural merit. The proposed development would provide a building that implements strong articulation and variation to promote visual interest. The scheme has a well-defined base, middle and top, and the architectural expression of the building uses design and high quality materials to provide a reference to the industrial heritage of South Acton. The subtle nuances in design, including wider fenestration at the buildings base, provide a clear delineation of the different uses within the scheme, but at the same time provides a strong design link through the whole façade. The scheme has been assessed against Tall Buildings and Heritage policies, with the conclusion being that the site is appropriate for a tall building and the impact on heritage assets within long range views constituting 'less than substantial harm'.

Of notable concern, which was particularly raised throughout the consultation period, is the impacts of the proposal on neighbouring properties, as well as the allotment gardens. The submitted Technical Assessment has been thoroughly scrutinised and it is considered that the impacts on surrounding residents and the allotment gardens would not be substantial and are on the whole, acceptable.

The scheme would be car-free, provide adequate cycle parking provision and would promote a modal shift to more sustainable forms of transportation. The application site is located close to the South Acton Underground Station (Overground "Mildmay Line"), as well as within walking distance of the Acton Town Underground Station (Piccadilly and District Lines). Whilst it is noted that current conditions around the site means that accessibility is poor, the combination of the delivery of an adoptable Greenock Road, as well as public realm improvements identified within the Masterplan (to which the applicant will financially contribute) would provide better safety and accessibility for future residents.

Council's Energy Consultant is highly supportive of the proposed development, with the scheme delivering cuts in the overall site-wide CO₂ emissions by 72.84%, with 15.79% carbon reduction through "Lean" efficiency measures, and 57% through "Green" renewable energy. Corresponding s106 obligations and conditions have been recommended.

Overall, the proposed development has been well-designed to deliver new homes and industrial space. It is consistent with the priorities, vision and strategy of the Council as outlined within the Council Plan, by delivering more industrial capacity in a more modern and flexible arrangement that would suit a variety of existing and emerging industries within West London. The scheme would also deliver good quality homes, with a good affordable housing offer.

It is accordingly recommended that the application be approved, subject to Stage II referral to the Mayor of London, the completion of a s106 agreement and s278 agreement.

Recommendation:

That the committee **GRANT** planning permission subject to the satisfactory completion of legal agreements under section 106 of the Town and Country Planning Act 1990 (as amended) in order to secure the items set out below.

The application shall also be subject to Stage II Referral to the GLA.

Financial Contribution Heading	Proposed Contributions
Local Healthcare Provision	£260,000
Education	£230,000
Leisure Facilities – Active Ealing	£70,000
Affordable Workspace	£4,417
Open Space	£35,000
Children’s Play Space	£55,000
Allotment Gardens	£13,000
Transport Services	£20,000
Public Realm Improvements – Masterplan (Regeneration)	£10,000
Employment and Training Monitoring	£31,000
Bus Service Improvements - TFL	£91,000
Air Quality Mitigation	£34,000
Subtotal	£853,417
Carbon Dioxide Offsetting	£91,360
Energy Monitoring	£8,496
Total Contributions	£953,273

- Prior to commencement of the development (excluding demolition), the applicant shall consult with Highways and Council’s Landscape Architects and pay for Design Work to bring Greenock Road to an adoptable standard, along with the improvement to the public realm including street greening and trees. The applicant shall be responsible for Council’s reasonable costs of this work. Indicative costs have been estimated to be £20,000.
- Prior to occupation of the development, the works to bring Greenock Road to an adoptable standard, in line with the design developed in conjunction with Council’s Highways Team and Landscape Architects, shall be substantially complete and confirmed as such by Council’s Highways Team. This work will need to be undertaken at the cost of the applicant. Indicative costs have been estimated to be £120,000 and will be subject to change depending on final design.
- All proposed disabled parking bays shall be provided with electric charging points
- Works to create the highway shall be carried out under licence from the London Borough of Ealing.

- 36.5% of units by habitable rooms in the form of 26 homes (75 HRs) within London Affordable Rent Tenure and 17 homes (51 HRs) within Intermediate (Shared Ownership) Tenure
- 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.
- Early-Stage Viability Mechanism for Affordable Housing.
- Payment of the above contributions, which are to be index-linked.
- Participation in the Apprentice and Placement Scheme – 8 Apprentices and 25% Local Labour Hire. A £49,395 penalty for each obligation that is not met.
- An Employment, skills, and training delivery strategy shall be submitted to the Employment and skills S106 team. The developer will engage directly with the partnerships and procurement manager and will be required to submit quarterly monitoring no later than one week after quarter end.
- Restriction of Parking Permits – all the units and their occupants shall be precluded from obtaining a parking permit and visitor parking vouchers to park within existing or future CPZs in the area.
- Implementation of the Travel Plan
- Payment of Council's reasonable legal and planning officer administration costs incurred in preparing the s106 agreement.
- Administration and professional costs for monitoring the legal agreement.

AND

Subject to conditions/informatives that can be found at the end of the report.

Site Description:

The application site is a somewhat irregular shaped plot, with an area of approximately 2,000sqm and a frontage to the unadopted Greenock Road of approximately 28 metres. The existing conditions of the site include two separate buildings. 10 Greenock Road is currently occupied by a freight transport business. 8 Greenock Road is known as Durable House, which consists of 7 individual commercial units comprising a number of industrial and office activities. It is understood that some of the individual units are currently unoccupied.



Figure 1: Site Location

In terms of restrictive planning designations, the site located within an LSIS (Locally Significant Industrial Site) as well as an area of both Local and District Park Deficiency. To the north-east of the site is the South Acton Allotments and to the south of the site is the railway corridor which serves the Overground Line, as well as the potential future West London Orbital. On the other side of the railway are a number of conventional residential properties that face Weston Road. The separation distance between the application site and the rear boundary of these residential properties ranges from between 35 and 49 metres. To the north of the site are predominantly commercial activities, which includes a dark kitchen, a bespoke building, interior and design company as well as a number of other SME and industrial type uses.

There are a number of emerging developments surrounding the site that are similar in principle to the proposed development. This includes 29-39 Stirling Road, approved under ref: 204553FUL. Other similar developments include 2-10 Roslin Road (also approved under ref: 204553FUL), 1 Stirling Road/1-9 Colville Road and 67-81 Stirling Road (with different applications approved or resolved to approve under ref. nos. 214611FUL and 232800FUL) and 3-15 Stirling Road (approved under ref: 214991FUL).

There is also an existing proposal for a similar type of development at an adjacent site that is described as Land Opposite Ravenswood Court, Stanley Road, that is currently pending consideration under planning application ref: 195284FUL.

The Proposal:

The proposed development involves the demolition of the existing buildings and the construction of a mixed-use development. The scheme will comprise the following:

- 2,159sqm of industrial space over ground, first and part-second floors. This is an uplift from the existing floor space of 1,750sqm.
- Off-street servicing and delivery areas for the proposed industrial space.
- 124 residential homes in a variety of different sizes.
- Double-height space for a café or similar at the Greenock Road frontage of the site.
- A building up to 18 storeys, with two separate shoulders that are 12-storeys in height to its north-eastern side and 15-storeys to its south-western side.
- Communal amenity space at ground, third, twelfth and fifteenth floor levels and children’s play space at third floor level.
- Ancillary refuse and cycle storage areas.



Figure 2: Proposed Development as viewed from Colville Road

Consultation:

Public:

Public consultation was carried out in accordance with the requirements set out in the relevant legislation, by way of a number of site notices being placed in the surrounding area. A number of site notices were placed on lampposts within the surrounding area, which included extensively throughout Acton Gardens, the surrounding LSIS and in the residential neighbourhood south of the railway.

Consultation commenced on 19/04/2023 and concluded on 10/05/2023. A number of comments were received outside of this consultation period but were nevertheless accepted in full.

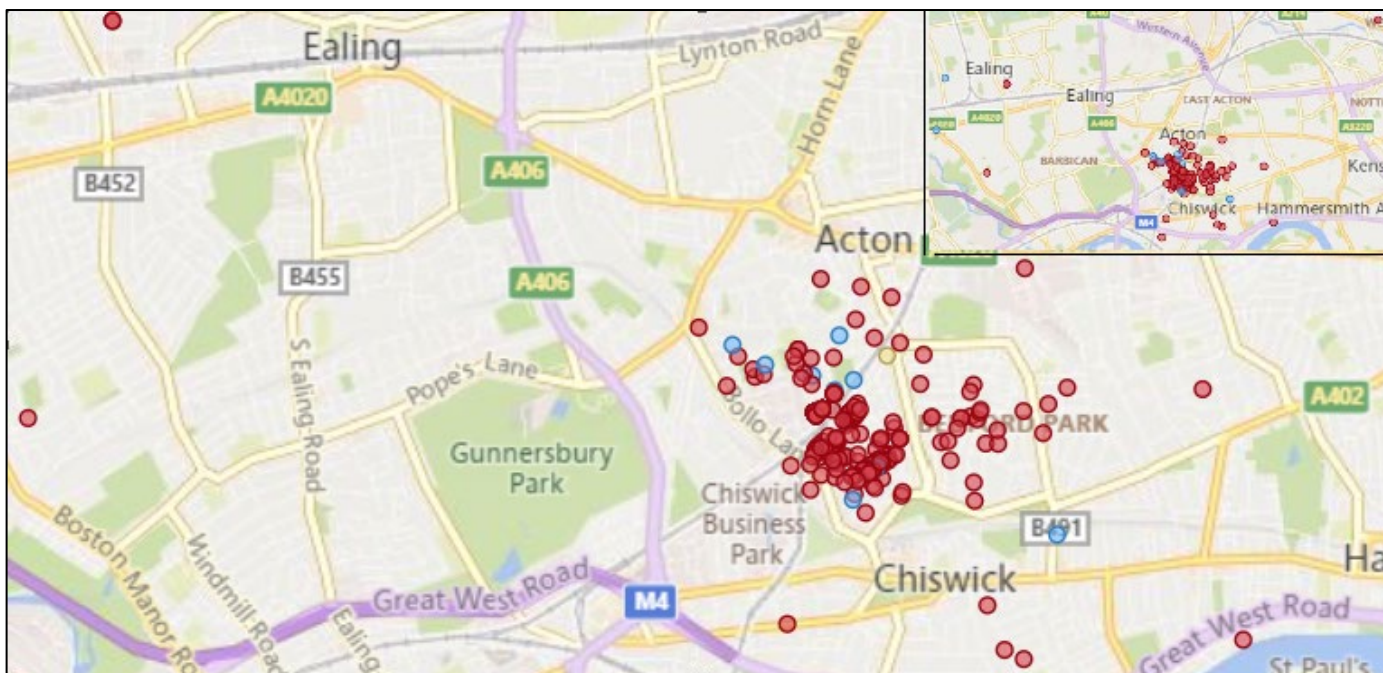


Figure 3: Location of objections (red) and support (blue)

The image above shows the locations of representations received in objection and support.

The consultation period attracted significant community interest in the scheme, with a total of 256 representations received from the local community. These representations would be categorized as 242 objecting to the proposed scheme, 13 supporting the scheme and 1 neutral. A summary of the points of objection are provided within the table below. It should be noted that the predominant objection to the scheme was relating to height.

Comment	Officer Response
Building is too tall and out-of-keeping with the surrounding area	As is outlined within this report, the development would be marginally higher than the indicative maximum heights as outlined within the recently ratified South Acton LSIS Masterplan. Council Officers are of the view that the increased height has been justified against the masterplan, as outlined within this report, due to the improvements to Greenock Road that will be delivered as part of

	<p>this scheme, as well as an uplift in industrial capacity and increase in affordable housing.</p>
<p>Negative impact on the allotments</p>	<p>Since pre-application discussions with Council commenced on the proposed development, Council Officers have raised the issue continuously with the applicant with regard to the impact of the proposed development on the adjacent allotment gardens. Significant design refinement has occurred since the initial stages of the development and Officers are satisfied that the impact on the allotments are acceptable, as will be outlined within the following report.</p>
<p>Not enough parking for commercial tenants and will result in an increase in heavy goods and truck movements</p>	<p>The proposal would result in a significant improvement on the existing situation where and servicing of these site's largely occurs on the street in an ad-hoc manner. The proposed development would deliver better off-street servicing. It is also a strategic objective of both the London Plan and Ealing Council to intensify the industrial capacity of sites, particularly when they are located in LSIS or SIL locations, such as this proposal.</p> <p>Nevertheless, it is not considered that the industrial uses would result in significant heavy vehicle movements over and above the existing situation.</p>
<p>Development will put a strain on existing community facilities and services</p>	<p>Aside from the contributions that will be secured toward healthcare and education infrastructure within the local area, the South Acton LSIS Masterplan has identified key infrastructure requirements for this emerging community, based on the principles of 20-minute neighbourhoods. It is anticipated that through future development in line with the Masterplan, that such facilities could be delivered as part of these developments.</p>
<p>Impact on properties on Weston Road</p>	<p>It is acknowledged that based on the existing situation, the proposal would result in a change to the outlook of some residents on Weston Road. However, the development has a significant setback from these properties, by virtue of the rail corridor, of 35 to 49 metres.</p> <p>A full assessment of the impacts of the proposed development on neighbouring residential properties will be contained within this report.</p>

<p>The development is not consistent with the Acton Gardens development</p>	<p>The development is within a different context to the Acton Gardens development and is a significant distance away. The proposed development will be assessed on its own individual merits.</p>
<p>Poor quality design</p>	<p>The design of the development will be discussed within this report, however it should be noted that the external appearance of the building incorporates a number of interesting elements including variations in height, materiality that references the industrial heritage of the site and uses different brick tones and varying degrees of articulation within the façade.</p>
<p>Development is purely profit driven for developers</p>	<p>Private investment within Ealing one of the essential drivers of economic growth and the delivery of affordable homes within the Borough.</p>
<p>There is no explanation as to what the applicant deems as 'affordable housing'</p>	<p>The definition of genuinely affordable homes is defined by the Mayor of London to include London Affordable Rent, Social Rent, London Living Rent and Shared Ownership. The proposed development would include provision for both London Affordable Rent and Shared Ownership.</p> <p>London Affordable Rent is a product aimed at those on low incomes and are below market rent based on a formula established by the GLA. Shared Ownership is a product that allows a person to purchase a portion of a new home and pay a subsidised rent on the remainder. This allows people using this product to step onto the property ladder.</p> <p>Both housing products are subject to strict qualifying criteria. The scheme would deliver 36.5% Affordable Housing, with a tenure split of 60/40 in favour of London Affordable Rent products over Shared Ownership.</p>
<p>No access to local parks</p>	<p>Whilst the site is within walking distance to both the Bollo Brook Park, Central Square and the Bollo Bridge Road recreation ground, the South Acton LSIS Masterplan has identified opportunities to create new pocket parks within the LSIS itself. It is anticipated that this could be brought forward through future development proposals within the area, as is outlined within the Masterplan, and within <i>Figure 6</i> of this report.</p>

<p>Proposal would result in an increased number of cars, vans and deliveries for the residential use which goes against the Mayor's objectives of reducing pollution</p>	<p>The scheme will be car-free for the residential element of the development and there will be limited, if any, opportunities for future residents to park in the area by virtue of the existing CPZ. No residents will be able to obtain a parking permit or visitor vouchers to park within the CPZ.</p> <p>Increasingly delivery companies are adopting the use of electric vehicles, which will only increase into the future.</p>
<p>The documents show a large building at 93 Bollo Lane which does not exist and gives a false impression of tall buildings within the area. This application has not been further discussed since November 2021</p>	<p>This scheme is still pending consideration due to an announcement from the GLA and the Housing Secretary, mandating second staircases for the development of building over a certain height. The proposal for 93 Bollo Lane has been affected by this.</p> <p>However, Council Officers are in receipt of some revised plans for this application and implications of the changes will be communicated with the Chair of Planning Committee prior to final determination. It should be noted that the revised plans do not involve an increase in bulk, height, scale or massing and only involve internal changes to the proposed building.</p>
<p>Objection to the principle of making Greenock Road one-way as this restriction would be detrimental to car users who live in the area</p>	<p>Greenock Road is a loop street that connects to Colville Road on both ends. Therefore, the only likely users of this road are those visiting individual businesses on this road. It is not currently a route that would provide any access to residents.</p> <p>In any case, the proposal would significantly improve the existing conditions of this road that will be outlined within this report.</p>
<p>Ealing is only concerned with raising more Council Tax. Houses should be built instead</p>	<p>Houses would be inappropriate use for this site. Council has strategic objectives to deliver more housing for local residents and targets are set out within the London Plan to deliver new housing.</p> <p>Potential revenue generated by Council Tax is not a planning consideration, nor has it had any effect on the assessment of this application.</p>
<p>Overlooking of properties on Weston Road and reduction in light/increased overshadowing</p>	<p>This impact on neighbouring properties will be discussed within this report.</p>

<p>Development should include doctors surgery, school, dentist, shops</p>	<p>The South Acton LSIS Masterplan outlines types of essential facilities that will be required for the emerging community, which may be included within future development proposals within the area. The development will make a contribution towards healthcare facilities within the local area, however the provision of healthcare facilities is the ultimate responsibility of the NHS, who are currently undertaking a strategic assessment of the needs of the local community within Acton.</p>
<p>Development will set a precedent for further development of the industrial estate</p>	<p>Development within the area will be subject to the new provisions of the South Acton LSIS Masterplan which will limit future and piecemeal development of the industrial area for housing.</p> <p>The Masterplan clearly identifies locations where co-location of residential and industrial uses could be appropriate.</p>
<p>The Council's ambitions to create 20-minute neighbourhoods will be damaged if all the industrial area is turned into housing</p>	<p>The South Acton LSIS Masterplan identifies particular sites that are suitable for co-location of industrial and residential uses, which a significant portion of the Estate now limited to industrial only.</p> <p>20-minute neighbourhoods are a key consideration of the South Acton LSIS Masterplan</p>
<p>Lack of buses in the area</p>	<p>TFL have requested contributions to bus service improvements, in line with other developments within the area. Bus Service Contributions have been secured.</p>
<p>Will cause increased traffic on Bollo Lane</p>	<p>The proposed development will be car free. Whilst there will be movements associated with the industrial use, this will not be significantly over and above the existing situation. Whilst the proposal will also result in deliveries to the residential use, it is not considered that the trip generation would be additional, as delivery companies typically service an area concurrently, rather than an individual development.</p>
<p>More frequent public transport is required if the development is to proceed</p>	<p>Acton Town is serviced by the Piccadilly and District Lines. TFL are currently undertaking a £2.9 billion investment program which will result in new trains and signalling improvements which will result in 23% more passengers being able to be transported during peak hours. This will begin to be rolled out in 2025.</p>

	<p>Consultation and discussions are still ongoing for the potential West London Orbital which will likely service South Acton Overground Station.</p> <p>Bus Service Contributions have been secured.</p>
<p>Lack of community consultation</p>	<p>Prior to the submission of the application, the applicant undertook community consultation. In November 2022, two events were held at the South Acton Community Centre and an invitation was sent 1,000 local residents. Some representations received noted that they attended one of these events.</p> <p>Consultation has been carried out by Council in line with statutory obligations and representations have been accepted in full regardless of their date of submission.</p>

The Ealing Civic Society also commented on the proposed development and objected, in principle, to the proposed development. Whilst they welcomed the improved design and materials of the proposal, the proposal would be inappropriate for residential development, would cause a shadow over the adjacent allotment gardens. The application also makes reference to a number of tall buildings in the area, but the Civic Society notes that these are closer to Bollo Lane and should not be used as a reference point. It also notes the adjacent scheme at Stanley Road but notes that this scheme has remained undetermined for a number of years and has over 500 objections.

Officer Response: The impact of the proposal on the allotment gardens has been given due consideration during both preapplication discussions with Council Officers, as well as both the Design Review Panel and Community Review Panel. A full assessment of this impact will be provided within this report. It should be noted that the representation from the Ealing Civic Society was received prior to the emergence of the South Acton LSIS Masterplan, which outlines appropriate locations for co-located developments. The Stanley Road scheme that is referred to is also scheduled to be reviewed by the Planning Committee on 28 February 2024.

A summary of the points in support of the scheme are outlined below:

- New homes will contribute positively to the area’s regeneration.
- It will be good to see a new community for families being developed.
- Proposal would support local businesses.
- Industrial estate is a mess and this proposal will provide a kickstart to a very large area.
- The area needs additional housing.
- Design is appealing.
- The area is not nice to walk through, and this proposal would improve this.
- Time to inject some life into the area.
- The new flexible industrial spaces will be great for modern businesses.

Design Review Panel and Community Review Panel

The Design Review Panel reviewed the initial proposals for the site at a meeting on 11 October 2022. A summary of the points raised is provided below. An image of the proposal presented to both the Design Review Panel and the Community Review Panel is also shown below.



Figure 4: Initial Proposal Presented to Design and Community Review Panels (October 2022)

- Panel did not agree with the GLA’s initial pre-application assessment that the application could be brought forward in the absence of Masterplan.
- The indicative Masterplan that was delivered to the DRP by the applicant was unconvincing and un-coordinated.
- The proposal did not make sense in its existing context and only makes sense as part of a wider development of the area.
- Proposal would have an awkward relationship with the unresolved application at Stanley Road adjacent to the site.
- The access to the site would be along a neglected, unadopted carriageway with no footpath.
- A bolder appearance would be welcomed with more creative elevational treatments.
- Constraints regarding access to green and open space, particularly giving regard to the cumulative impact of development on the surrounding area.

Officer Response: Council Officers had advised the applicant prior to the meeting of the incoherency of the indicative Masterplan that the applicant had presented. This was affirmed by the DRP. As a result, given the fragmented ownership structure of the LSIS, the only reasonable outcome for the delivery of a Masterplan was that Council undertake this work. This was commenced shortly after the submission of this

application. The current proposal was considered as part of the development of the Masterplan, but was not a determining factor in its recommendations.

In any case, in the context of the new Masterplan, parameters for development of this site and other sites surrounding have been set. The adherence of the proposal to the Masterplan is outlined within this report. It should be noted that the DRP reviewed the scheme prior to the Masterplan being finalised.

Issues relating to Greenock Road and its acceptability to accommodate residential uses have been addressed through the course of this application, with a reasonable and deliverable way forward to bring the road to an adoptable standard. This is outlined within the Heads of Terms. Prior to the submission of the application, Council Officers also requested that the applicant work with the applicant of an adjacent development proposal on Stanley Road (195284FUL) to ensure that proposals could co-exist, particularly in relation to their servicing arrangements. This will be discussed within this report.

It should also be noted that since the scheme was reviewed by the DRP, the design has changed to give the building an industrial vernacular that celebrates the heritage of both the site and the historical development of Acton. The building mass and heights have also been rationalised to move the building further away from the adjacent allotment gardens.

The Community Review Panel reviewed the initial proposals for the site at a meeting on 18 October 2022. A summary of the points raised is provided below:

- The development could be a significant improvement to the area, but it recommends developing a Masterplan to protect the significance of the LSIS.
- Concern about the delivery of public realm improvements (Greenock Road) and it may take some time to deliver.
- Some concern was raised with relation to the height of the building, but it was noted that it was broadly in keeping with the emerging context of the wider area. Suggestion to lower the shoulder heights which could improve the transition to buildings nearby.
- Car-free nature of the scheme was positive.
- Welcome approach to landscape design and urban greening.
- Co-location of uses could work well, however, consideration should be given to ensure that noise and air quality impacts are taken into consideration.
- Would like to see commercial and retail uses to support the new community.
- Embracing the 'soapsuds' history of the site was welcome and could give the building a distinct identity.
- Raingardens could be used for sustainable urban design measures.

Officer Response: As noted previously for the DRP, the scheme was reviewed by the CRP prior to the finalisation of the Council-initiated Masterplan. The comments from the CRP were generally positive. The design of the building has been further refined to express a more industrial character with significant improvements to variation and articulation and the use of materials. The rationalisation of the building to move this away from the allotment gardens has increased the height of the building and the shoulders, however it is considered that the design of the building is successful which will be addressed further within this report.

Conditions have been recommended to ensure that the residential and industrial uses can co-exist, with relation to noise and air quality. The delivery of public realm improvements has also been finalised to ensure that they are complete prior to any occupation of the premises.

Internal Consultation:

Pollution-Technical (Noise and Vibration)	The acoustic survey report by Idom dated March 2023 has been reviewed and a number of conditions have been recommended.
Pollution-Technical (Air Quality)	<p>London Plan 2021 and NPPF does state that planning decisions should ensure that cumulative impacts from all individual sites and upcoming developments should be considered including demolition and construction activities for any upcoming developments.</p> <p>The development proposal is also considering installing a generator on the ground floor, the air quality assessment doesn't consider impact of emissions during testing time on AQ concentrations and façade of dwellings that will likely face the flue of the generator.</p> <p>Conditions have been recommended, along with financial contributions towards air quality mitigation.</p>
Pollution-Technical (Contaminated Land)	<p>The report recommends a site investigation. Given the proposal is for a mixed development (residential and commercial) and based on the information available this is agreed with.</p> <p>Conditions have been recommended.</p>
Environment and Leisure	A contribution toward the improvement of leisure facilities through Active Ealing has been recommended within the Heads of Terms
Transport Officer (Cycling)	No comments received, however TfL have reviewed the cycle parking arrangements, which will be detailed within this report.
Economic Growth/Regeneration	<p>The proposals should follow the requirements and recommendations of the South Acton LSIS Masterplan to support the transformation of the area into a successful industrial led colocation neighbourhood that meets the needs of businesses, workers and residents. The proposals should follow the masterplan requirements, recommendations and guidance set out for uses, densities, heights, intensification, colocation and architecture character.</p> <p>Supportive of the enhancement and intensification of commercial floorspace in the area provided it demonstrates that it meets the needs of industrial businesses in the area. Proposed commercial floorspace should meet the minimum specifications set out in the emerging Greater London Authority's Industrial London Plan Guidance including assurances from an industrial workspace partner that the space meets local industrial business space needs. This includes measures to mitigate the potential impact of industrial uses on residents.</p>

	<p>Proposed development will be expected to contribute to the delivery of an enhanced public realm including additional public and green space to make the area more attractive and meet the needs of new residents and businesses. Proposed development with co-located homes should consider providing additional amenities, public space and green space on site, alongside intensified industrial space and yard space. Collaboration and coordination with adjacent sites would greatly facilitate and enhance this provision.</p> <p>A contribution to public realm improvements has been requested.</p>
<p>Energy and Sustainability</p>	<p>Energy Consultant is highly supportive of the proposed Energy Strategy.</p> <p>The development is all electric with no gas infrastructure on-site.</p> <p>The strategy proposes a centralised Air Source Heat Pump distribution loop with electric boilers (for 5% peak load), to provide space heating and DHW. Space cooling for the non-residential areas will come from VRF electric panels.</p> <p>PV has been realistically maximised with a 20 kWp array.</p> <p>The Council confirms that there is no available “Clean” district heat network (DHN). However, the energy plant room will be futureproofed for connection to any future DHN.</p> <p>At the current design stage the overall site-wide CO₂ emissions will be cut by at least 72.84%, with 15.79% carbon reduction through “Lean” efficiency measures, and 57% through “Green” renewable energy.</p> <p>Conditions and s106 obligations and contributions have been recommended.</p>

External Consultation

<p>Greater London Authority (GLA) Stage I</p>	<p><u>Land Use Principles:</u> The proposed optimisation and co-location of industrial and residential uses on this Locally Significant Industrial Site would not follow a plan-led approach, but could be supported on balance subject to addressing the retention of the industrial capacity, the functioning of the LSIS and ensuring amenity of residential units</p> <p><u>Housing and Affordable Housing:</u> The scheme would provide 35% affordable housing by unit and 36.5% by habitable room with a tenure split of 60% London Affordable Rent and 40% Shared Ownership. The affordable provision, affordability levels and early-stage review mechanism must be appropriately secured.</p> <p><u>Urban Design:</u> The architecture and material palette are generally supported. However, further work is required to resolve concerns</p>
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	<p>relating to layout, environmental and functional impacts of the development and to address the Agent of Change principle.</p> <p><u>Transport</u>: Further information is required on trip generation, public transport, improvements to the highway, car parking, deliveries and servicing.</p> <p><u>Climate and Environmental Issues</u>: Further information is required in order to demonstrate compliance with policies relating to energy, Whole Life Carbon and Circular Economy.</p> <p>Officer Response: It should be noted that the GLA response was received prior to the South Acton LSIS Masterplan. Other issues will be addressed within this report, or have been addressed between the GLA and the applicant directly.</p>
<p>Transport for London (TfL)</p>	<p>The applicant has not provided an updated Active Travel Zone (ATZ) assessment, including night-time hours. Further consideration to the routes to the site within darker hours, particularly relating to women’s safety and the take up of active travel options.</p> <p>Concern is raised in relation to the proposed treatment of the southern boundary which runs the risk of feeling like a back-land escape and unlikely to feel safe to use. Also concern regarding the boundary treatment to the railway to prevent trespass.</p> <p>It is noted that the applicant has accepted LB Ealing’s proposal as set out in the e-mail dated 20 November 2023. Early sight of the Grampian condition that is to be attached to prevent any occupation of the development until the road has been adopted by the Council would be welcomed.</p> <p>Concern relating to the cycle parking provision and the amount of two tiered racks proposed.</p> <p>Some disagreement between the applicant’s Trip Generation Data provided. This results in a person trip rate of 0.512 during the AM peak and 0.459 during the PM peak. Accordingly, the proposal would likely generate a total of 13 and 12 bus trips during the AM and PM peak respectively. A contribution towards bus service improvements has accordingly been recommended.</p> <p>No assessment has been made as to the additional demand on the on-street loading bay has been provided. To facilitate the introduction of the proposed loading bay, an existing loading bay has to be removed. It is therefore reasonable to assume that the demand from the existing loading bay will be displaced into the one proposed by this development.</p> <p>It would be useful to understand what restrictions will be implemented at</p>

	<p>the proposed loading bay and how these are to be enforced. It must be ensured that delivery and servicing activity from this site does not overspill into the surrounding highway network.</p> <p>A Delivery and Servicing Plan (DSP) should be secured through the appropriate mechanism.</p> <p>Officer Response: Whilst Council acknowledges the shortfall of the ATZ Assessment during nighttime hours, the South Acton LSIS Masterplan has been produced since the TFLs comments were received. The Masterplan identifies pedestrian desire lines from Bollo Lane into Stanley Road, passing through Colville Road. The Masterplan notes that “the site is relatively permeable and walkable...quality and safety could be improved”.</p> <p>The Masterplan recommends that along Colville Road, which consists of the pedestrian desire line, that active frontages be established here, with widened footpaths, new street trees and the removal of some parking bays. New street lighting is also recommended here, as well as improvements to the cross-block link between Colville Road and Stanley Road. Whilst the applicant fails to consider the nighttime conditions within this ATZ Assessment, it is considered that the Masterplan fulfils this role by identifying areas to improve, which already consented s106 contributions and those delivered through this proposed development could be used to implement.</p> <p>The proposal will also involve the full upgrade to Greenock Road, which will significantly improve safety and amenity, to encourage active travel and the safety of women and girls in nighttime hours.</p> <p>Loading arrangements may be subject to change subject to further detailed design work that will be secured through Grampian s106 obligations for the upgrades of Greenock Road to an adoptable standard.</p> <p>The matters relating to the safety of the access pathway around the building will be subject to further detailed assessment through the Secure by Design condition.</p> <p>A DSP and contribution toward bus service improvements has been included within the recommendation.</p> <p>The cycle parking provision will be assessed within this report.</p>
<p>Heathrow Airport Safeguarding</p>	<p>No comment received.</p>
<p>Underground/DLR Safeguarding (TfL)</p>	<p>No comment to make on the planning application.</p>
<p>Network Rail</p>	<p>A number of concerns have been raised by Network Rail, particularly in relation to the proximity of the application site to the railway. Given the</p>

	extensive nature of the concerns raised, this will be addressed within the report below and conditions and informatives have been recommended.
NHS Property Services (Healthcare)	No response received. However, the HUDU Model calculator was used to determine a contribution toward healthcare. This is included within the recommended Heads of Terms of the Legal Agreement.
National Highways	No comment received.
London Fire Brigade	<p>Suitable refuge spaces will be provided at each level.</p> <p>An assessment should be carried out to demonstrate that the capacity of the lifts is sufficient for occupancy numbers.</p> <p>In accordance with requirements, blocks of flats with a top storey higher than 11 metres should be provided with wayfinding signage.</p> <p>All other matters should be fully considered through a fire strategy, which should be secured by condition.</p>
Historic England (Archaeology)	On the basis of the information provided, we do not consider that it is necessary for this application to be notified to Historic England’s Greater London Archaeological Advisory Service
Health and Safety Executive (Fire Safety)	Following a review of the information provided with this consultation, HSE is content with the fire safety design of the detailed element of the application, to the extent that it affects land use planning. However, HSE has identified some matters that the applicant should try to address, in advance of later regulatory stages.
Metropolitan Police	The development must achieve Secured by Design accreditation prior to occupation.
Thames Water	<p>Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Requested Condition: Piling Method Statement Development and Infrastructure Phasing Plan</p>

Planning Policies:

The relevant policies are listed in the Informatives description section below.

Reasoned Justification:

Background and Principle of Development

The proposed development involves the demolition of existing buildings on the site and the construction of a mixed-use building, comprising industrial uses and a café at ground floor level, co-located with residential accommodation with 124 residential homes proposed. The principle of the co-location of industrial and residential uses is established by Policy E7 of the London Plan, which states that mixed use developments comprising residential uses should only be supported where there is full re-provision of the existing industrial floorspace. The Agent of Change principle is engaged in such instances, whereby the industrial and related activities on surrounding sites are not compromised in terms of their continued efficient function, access, service arrangements and hours of operation. Such developments should also incorporate appropriate design mitigation to achieve the above, in matters relating to safety and security, access, design quality, public realm, visual impacts, vibration and noise and air quality.

Policy E7 also states that this approach to development within LSIS locations should 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”. This is further caveated by the following points:

- It extends to the full boundary of the LSIS.
- It meets objectively assessed industrial needs.
- It achieves a high quality of built environment and delivers any necessary supporting infrastructure, affordable housing and affordable workspace contributions.

It is considered that the Masterplan that has been developed accords with the above three principles.

Similar forms of mixed-use development have been consented within the local area on sites 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. The application site, however, falls outside the defined area of this Framework Masterplan.

Since the approval of these applications, significant pressure on further development within the LSIS has occurred. In response, Council has developed 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.

South Acton LSIS Masterplan

Ealing Council commissioned a masterplan, which was prepared by Haworth Tompkins, in collaboration with other development partners in April 2023. The overall aims of the Masterplan 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 also developed in consultation with the LBE project team, including colleagues from Council’s Planning Team and Regeneration Team, as well as many external stakeholders, including TFL, the GLA, local landowners and developers. Several 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 contexts, site character, streetscape, existing land uses and total floorspace, types of businesses, transport connections, access, parking, connectivity and public realm and green space. This has resulted in design guidance and an overall masterplan proposal.

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



Figure 5: Zoning Option for Co-Location (Blue), Solely industrial (Red) and Residential (Yellow)

Some of the 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 prevention a piecemeal co-located development by clearly defining the appropriate

spaces for mixed-use development. The site falls within the co-location zone and is therefore in accordance with this principle of the Masterplan.

Height and density were also considerations given within the Masterplan. The determinations on height and density were given by establishing both the consented and emerging schemes within the local area, establishing principles through a Benchmarking exercise and consideration given to the distinct lack of green space that currently exists within the LSIS. Based off an assessment of green space requirements for the local area, a density target of 300 units/ha was considered appropriate. The development would exceed this target at 590 units/ha; however, this is broadly in line with the densities of other consented schemes in the area.

The Masterplan identifies areas of the LSIS where public realm improvements could be delivered within the local area, including potential spaces for future pocket parks or public squares which would deliver the placemaking objectives of the Masterplan and increase the amount of green space. These are considerations that would need to be given within any future development of other sites within the co-location zone.

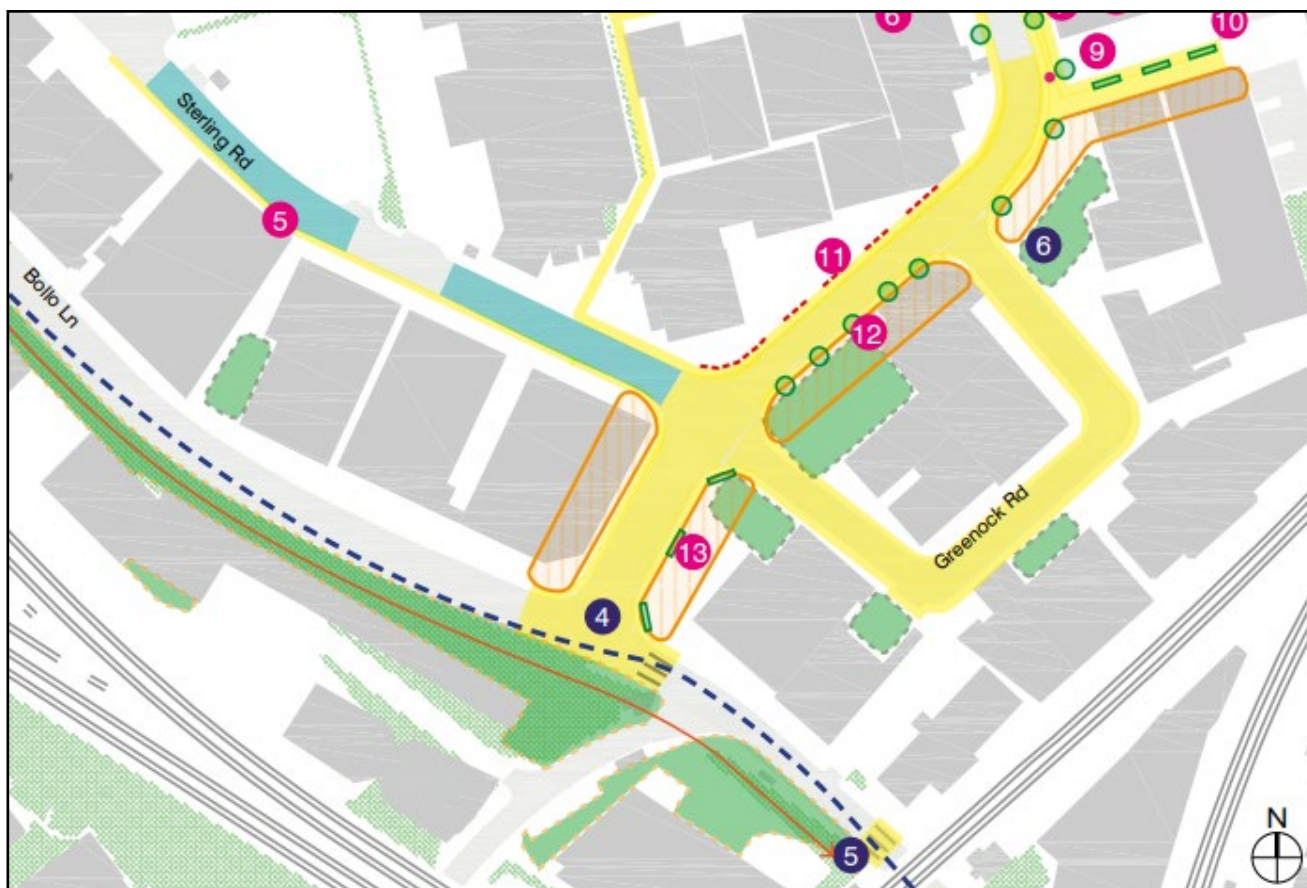


Figure 6: Potential Public Realm Improvements

Whilst the proposed density of the scheme would exceed the target density of the Masterplan, it should be noted that the proposed development would deliver additional public realm that goes beyond that which has been identified within the Masterplan, resulting in additional open space being provided and establishing the principle of a linear open space area along the southern side of Greenock Road by

establishing a strong building line back from the street.



Figure 7: Open Green Space Proposed on the right-side of image

Building heights are also established for each part of the Masterplan area. This is shown within the image below:

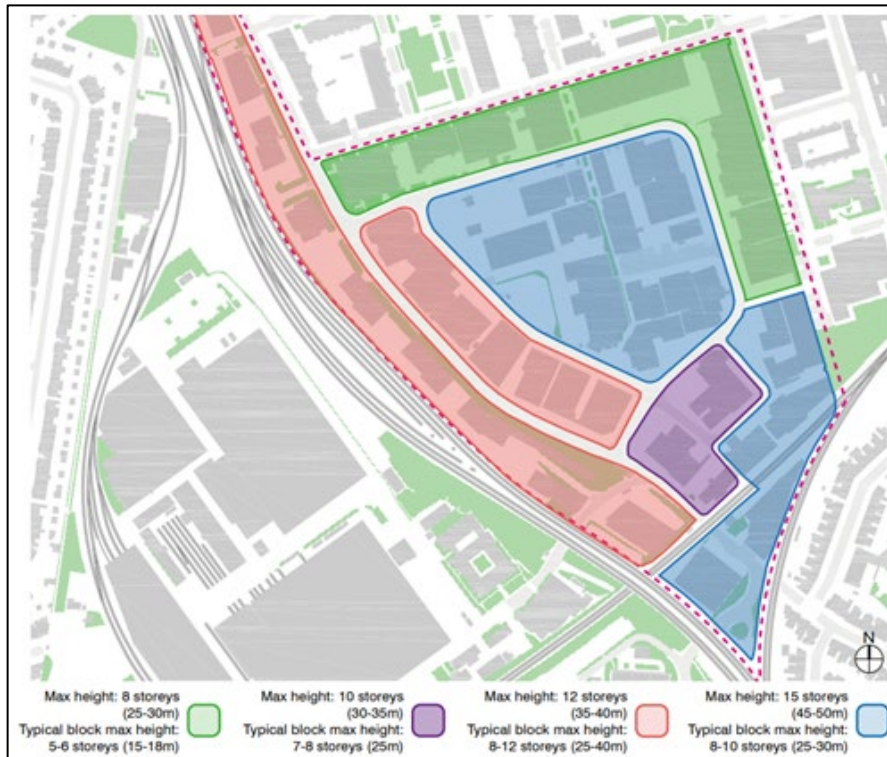


Figure 8: Building Heights

The area shaded in blue, to which the application site forms a part, has a maximum height of 15 storeys, with a typical block height of 8-10 storeys. It is noted that the proposed development, at a height of 18 storeys, would exceed the maximum height identified by the Masterplan. It should, however, be noted that the Masterplan also 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

In this instance, it is considered that the re-provision of the industrial space is highly successful. The existing building is within a very poor condition with makeshift metal structures dominating the front of the application site right up to the street. Currently, servicing and parking in Greenock Road is ad-hoc, with such arrangements currently occurring within an unorganised manner. The proposal would bring all servicing and deliveries associated within the industrial space off the street, with on-site servicing areas having direct access into the industrial space. Having dedicated off-site servicing will increase the attractiveness of the space to accommodate a wide variety of industrial end-users.



Figure 9: Ground Floor Showing Industrial Space and Off-street servicing area

The proposal would also result in a good uplift in the amount of industrial floorspace from 1,730sqm to 2,159sqm, a total uplift of 429sqm or 22%. The space would occur over ground, first and part-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 4.5m internal floor-to-ceiling heights, which will be attractive to a wide range of occupants. The floor-to-ceiling heights proposed are also consistent with other industrial spaces being delivered within the masterplan area.

It is estimated that existing buildings on the site have the capacity for up to 39 FTE jobs. The proposed development would deliver the potential for between 45 to 79 FTE jobs, in a more functional space. Therefore, the proposal would not only increase the amount of available floorspace, but it would also increase the employment potential of the site, aligning with the Council Plan 2022-2026 to create good quality jobs.

In addition to this, it should be noted that Greenock Road is owned by Council, however, is currently not adopted. As stated within the South Acton Masterplan, there are a number of potential public realm improvements mentioned as necessary for the successful implementation of the masterplan and the overall improvement to the amenity of the area. These include items such as “widening of footways”, “new surfacing to existing routes” and “proposed widening of footway and one way system for Greenock Road”.

The scheme would deliver on this by proposing to bring Greenock Road to an adoptable standard. As shown within the image below, the existing road is built to an incredibly poor standard. Its concrete construction and general poor surface quality, lack of a clear pedestrian pathway that is segregated from vehicle movement areas and informal and ad-hoc parking areas is a hindrance to the success of the area to be allocated for the co-location of industrial and residential uses.



Figure 10: Existing Condition of Greenock Road



Figure 11: Existing Condition of Greenock Road

As is outlined within the Heads of Terms of the legal agreement, the applicant has agreed to fund the necessary design work in conjunction with Council’s Highways Team and Landscape Architects, to bring the road to an adoptable standard. This would potentially include the reduction of Greenock Road from a two-way to one-way system, resurfacing of the road, improved drainage, creation of a clearly identifiable footpath and the implementation of street trees and urban greening. The applicant has agreed to the construction of the entirety of Greenock Road and appropriate trigger points for this work are included within the Heads of Terms, to ensure that the work is completed.

This represents a significant improvement to the existing area and would enable the delivery of this part of the masterplan. It is therefore considered by Council Officers that sufficient justification exists for a slight departure from the recommended heights of the Masterplan, from 15 to 18 storeys, to facilitate the delivery of necessary infrastructure. The proposed development would nevertheless meet the definition of a ‘tall building’ and accordingly the proposal will be assessed against both local and London Plan policy with respect to tall buildings.

Affordable Workspace

Policy E3 of the Ealing Draft Local Plan encourages developers to make provision for affordable workspace within new developments. It notes that such space can have broader social or economic benefit to the Borough. The policy states that “Affordable workspace in Ealing will be provided on the basis of a level on development of...5% of net floor space in office and industrial schemes”. It continues to say that where an industrial space is required to provide more than 3,000sqm of affordable workspace, then “provision should be by means of off-site contributions”.

Calculating the net amount of industrial space, this would refer to the uplift in the amount of industrial floorspace. In this instance, this would equate to 429sqm. Applying the requirements of 5% as outlined within the policy, off-site contributions should be secured for approximately 20sqm of space. It is noted that this is a very insignificant amount.

However, in the interests of consistency, a financial contribution towards off-site affordable workspace has been calculated using an established formula, which is detailed within the Heads of Terms.

As an additional point, Council has sought to ensure that the spaces that are to be delivered are wholly suitable a wider number of occupiers within the required use classes (E(g)(iii)/B2/B8) and that the space can be delivered in the most flexible way possible. Accordingly, the spaces have been designed with 4.5m floor-to-ceiling heights that are consistent with other similar types of development within the area and the space could be divided into smaller spaces as demand required. Conversely, it occupied by a single occupant taking over the entirety of the space. The image below, demonstrates how this could reasonably and indicatively occur.



Figure 12: Potential Subdivision of Ground Floor

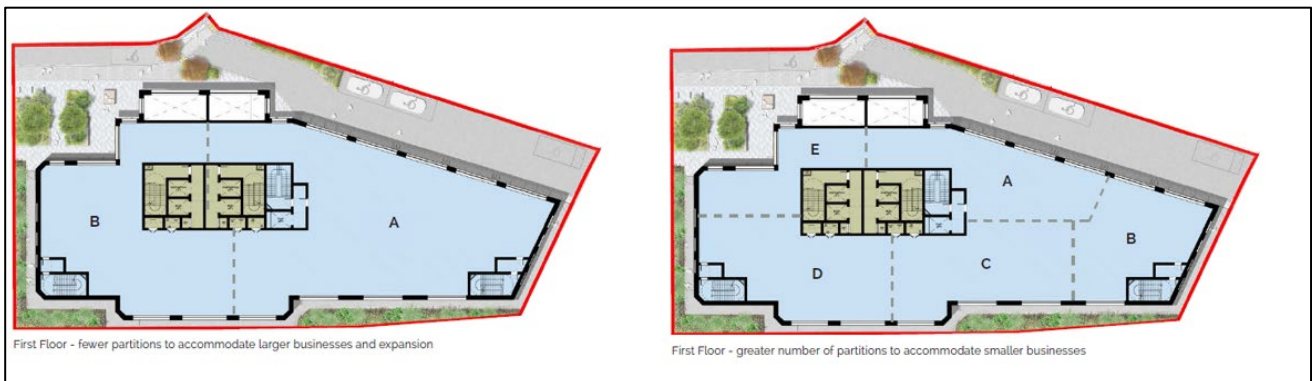


Figure 13: Potential Subdivision Options for First Floor

Agent of Change

Proposals that co-located industrial uses with residential within designated industrial zones, such as SIL and LSIS are required to consider the Agent of Change principle, as required by Policy E7(D)(d) of the London Plan. The Agent of Change principle places the responsibility of mitigating the impact of nuisances (including noise) from existing noise generating uses on proposed new development close by, thereby ensuring that residents and users of the new development are protected from nuisances, and existing uses are protected from nuisance complaints. As the proposal involves the implementation of residential uses into a predominantly industrial area, the responsibility falls on this more sensitive use to effectively mitigate any potential impacts that come along with typically industrial type uses.

Policy D13 of the London Plan states that development proposals should manage noise and other potential nuisances by:

- Ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area.
- Exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations.
- Separating new noise-sensitive development where possible from existing noise generating businesses and uses through distance, screening, internal layout, sound proofing, insulation and other acoustic design measures.

Accordingly, Council Officers first required the applicant to make an assessment of any existing potential nuisances to residential development, which has been carried out within the submitted Agent of Change report. Typical nuisances assessed include noise, but also vibration, dust, odour and lighting.

Noise

The noise nuisances identified within the local area include those from commercial, light industrial, rail and road sources. The existing acoustic environment has been tested by a suitably qualified individual which is summarised within the Environmental Noise Assessment. This Assessment has been reviewed by Council's Pollution-Technical Officer, who has recommended conditions to ensure that the internal living environment of the residential uses would be acceptable. This will be outlined further within this report.

The most dominant source of noise detected within the acoustic survey was from road traffic noise as well as noise from the existing uses of the site. It should be, however, noted that the existing noise sources within the application site will not continue post-development, as the existing premises will be demolished. Removal of these existing sources of noise will improve the acoustic environment, in comparison to the existing situation. Noise was also identified from the Lawsons Building Merchants near to the site.

It is considered that the applicant has accurately outlined the existing acoustic environment, to ensure that the appropriate mitigation measures of sound insulation can be implemented.

Vibration

The main source of vibration detected was that of the adjacent railway line and the associated movement of trains along the railway corridor. No other sources of vibration were detected from adjoining sites and passing vehicles along Greenock Road are limited to 20mph, limiting their potential to produce vibration. A Vibration Impact Assessment was included within the Environmental Noise Survey, which has been reviewed by Council's Pollution-Technical Officer.

Whilst it is noted that the measured levels of vibration would be perceptible at the proposed structure, the location of the residential floors would begin of the second floor of the building, increasing the distance between the source and the receptor (the residential homes). Given the relatively low levels of freight trains using this corridor, it is the judgement of both the engineer and Council's Pollution-Technical Team that the risk of an adverse impact on sensitive receptors within the development, in relation to vibration, would be low to negligible.

Dust

No significant dust generating uses are located within the vicinity of the application site. No impact has therefore accordingly been identified. The application has also been reviewed by Council's Air Quality Officer, with an assessment provided in a later section of this report.

Odour

The applicant's engineer notes that "the surrounding land uses are not considered to present a potential risk of odour generation". It should however be noted that there is an existing dark kitchen within the vicinity of the application site, to which the report does not identify. Council Officers would nevertheless agree with the conclusions of the Agent of Change Assessment that "no discernible odours were noted in the vicinity during any of the site visits completed by IDOM".

Council Officers have visited the site on numerous occasions and also have not detected any discernible odour within or around the application site. Impacts are therefore unlikely to exist with relation to odour.

Lighting

None of the commercial or industrial units around the site are noted to have any flood lighting that could cause a disturbance to any future residents. The only obvious source of light at night is that of LED streetlighting along Colville Road. It is not considered that there are any material concerns relating to lighting.

Based on the Agent of Change assessment, and subject to effective mitigation measures that will be secured by condition, it is not considered that there is any risk to the living conditions of future residents and existing industrial and commercial users around the application site are unlikely to be impeded in the continued operation of their businesses.

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 2021 (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:

- assets of particular importance, such as for example, heritage, environment, flood risk, ecology, protected countryside, provide a clear refusal reason or
- 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. This would include policy aims of the National Planning Policy Framework (NPPF).

Local Character and Design

Section 12 of the NPPF, London Plan Policies D1, D3 and D4 of the London Plan (2021) and Ealing Local Variation Policy 7.4 and Policy 7B of the Ealing Development Management DPD (2013) require new buildings to complement their street sequence, building pattern, scale, materials and detailing and to have high quality architecture. New buildings should also conform to the height,

scale and proportions of existing forms of development within the immediate area, in order to define a sense of place.

The NPPF demands that development shall achieve well designed spaces and encourages early engagement with Council's to develop designs that respond positively to the local area to create "high quality, beautiful and sustainable buildings". Similarly, Policy D4 of the London Plan states that developments should be given scrutiny at an early stage through the use of Design Review Panels (DRPs), which has occurred in this instance. The applicant has also sought advice from the GLA through their pre-application process prior to submission.

In addition to this, the Draft Local Plan Policy DAA states that new development should constitute high quality design that has a positive visual impact, which is achieved through accessibility and legibility and complements the local context through high quality materiality.

The applicant has engaged extensively in the pre-application process, as well as the Design and Community Review Panels in accordance with the requirements of Policy D4(D) of the London Plan. This has resulted in changes to the overall design of the scheme to rationalise the height, scale, bulk and massing of the proposed development. The scheme also has involved design interventions into the materiality of the scheme, to give the proposal a more industrial vernacular that relates more positively to the heritage of the site and the surrounding area.

In the immediate context the development greets the street with attractive signage that pays homage to the South Acton area's history, which was colloquially referred to as 'Soapsud Island'. The location of a café at the frontage of the site, with an attractive double-height window feature provides an active frontage to the street, which is also located to a clearly delineated residential entrance to the building.

The site is considered to truly an industrial led-scheme with the design of the industrial spaces taking up most of the space of the three-storey podium of the building. Whilst the residential and industrial uses are clearly separated, the design link is created through the similarities in the materiality of the façade through the entire building. The industrial façade extends in a diagonal line away from the street, with its own service road, providing off-street deliveries and servicing, also allowing the vehicles to enter the building.



Figure 14: Industrial Façade

The use of longer glazing elements along the industrial façade provides a contrast to the more conventionally sized windows to residential homes above. This allows the different uses within the scheme to be readily identified. The use of Crittall-style windows throughout the entire development, provides a cohesive design link, and gives the building a positive industrial aesthetic that places the development appropriately within its local context. Furthering the industrial aesthetic of the building is the intelligent use of green terracotta panelling below window frames with a texture similar to corrugated iron that provides reference to a typical warehouse material.

The overall approach to height, scale and massing is to provide a central area of height, with two separate shoulders at differing heights, providing a natural variation and articulation to the building. The two shoulders are also set back into the site significantly from the main central height to the building, giving a sense of grandeur to the building and emphasising the main frontage of the site. Slight changes in the mortar between the central section and the two shoulders also provide a subtle change to the different elements of the façade.



Figure 15: View along the railway toward South Acton Station

Policy D9 of the London Plan states that tall buildings are made up of three main parts, being a top, middle and base.

- The top should be designed to make a positive contribution to the quality and character of the skyline
- The middle has an important effect on how much sky is visible from surrounding streets and buildings, as well as on wind flow, privacy and amount of sunlight and shadowing there is in the public realm
- The base should serve the function of framing the public realm and streetscape, articulate entrances and help create an active and lively public realm

The below image illustrates the different parts of the building.

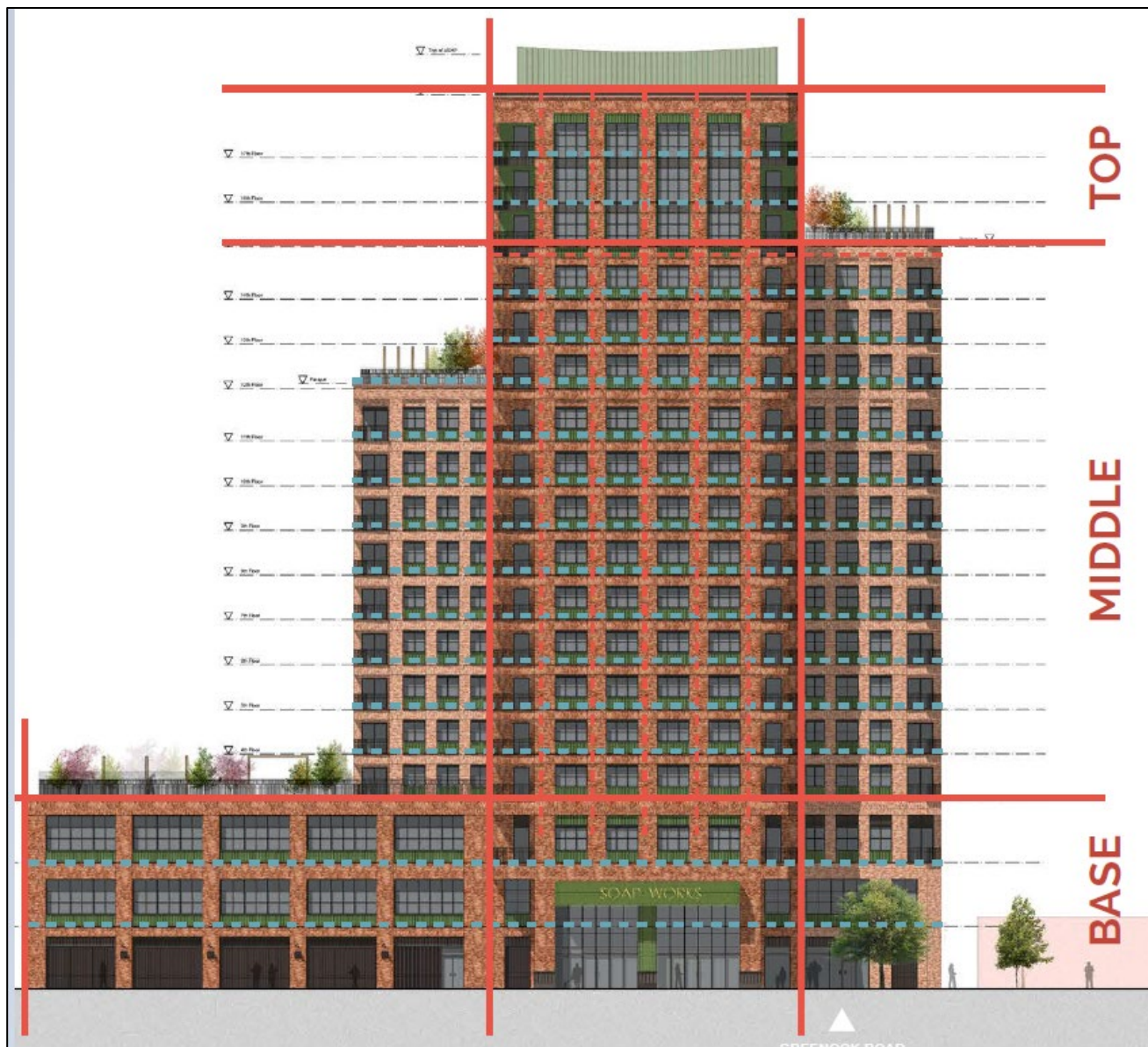


Figure 16: Sectional Analysis of the Proposed Development

The base of the building provides differentiation to the upper floor levels, with greater floor-to ceiling heights, to facilitate the industrial uses and include different proportions of glazing. The frontage to the site is emphasised through its design and creates an active frontage at the bend in Greenock Road. Different entrances are clearly defined, and additional public open space is provided to improve the visual amenity of the area. The middle of the building takes a conventional approach, with grid like fenestration, with interesting detailing. The differing shoulder heights are visible within the middle section, and along with their differing building lines, which provides visual relief and reduces the overall massing of the development.

The top of the building includes several design interventions to give the building an interesting and positive impact on the skyline. This includes an increase in the height of the Crittall windows to give a more elongated appearance that forgoes the typical brick banding on floors below. The inset of the balconies also includes a glazed terracotta feature that reflects the tones of the window banding

below. The building is also crowned with a sculptural terracotta feature that both provides some visual interest and screens the building services equipment.

The overall architectural expression of the building provides for an interesting building that will have a positive impact on the character and appearance of the area, which is currently generally in a very poor condition. The design of the development successfully incorporates an appropriate amount of variation in materiality, articulation within the façade and differing heights to ensure that the building would have a positive visual impact. The proposal is therefore considered to comply with Policies D1 and D4 of the London Plan, the NPPF, Policies 7B and LV7.4 of the Ealing Development Management DPD and Policy DAA of the Draft Ealing Local Plan.

Tall Buildings

Policy D9 of the London Plan, as advised above, addresses requirements for tall buildings, which in conjunction with Policy LV7.7 of the Ealing Development Management DPD defines a tall building as those that are “substantially higher than their neighbours and/or which significantly change the skyline”. Policy D9 also reiterates that a tall building is considered in accordance with its local context rather than a broad definition for the whole of London, however a tall building would generally not be considered as such when it is less than 6 storeys.

The Draft Local Plan Policy D9 states that the site would be located within Zone A7, which defines a tall building at 8 storeys, however, the policy also notes that “tall buildings on designated industrial sites will be subject to agreed masterplans and based on local impacts and sensitivity”. As has been referred to within this report and as shown within Figures 6 and 8, the site has been identified by the South Acton Masterplan as an area of focus for co-location of residential and industrial uses. The Masterplan demonstrates that heights up to 15 storeys may be appropriate, however small deviations to this height requirement may be appropriate where certain criteria have been met. The delivery of Greenock Road to an adoptable standard to enable the delivery of the Masterplan, as well as successful industrial intensification, along with a good housing mix and affordable housing provision are considered by Council Officers to meet these criteria.

In any case, a Townscape and Visual Impact Assessment has been carried out, which assesses the visual impact of the development from a number of different angles. The points that were tested were confirmed as acceptable by Council Officers prior to submission to ensure that a full picture of the visual impact of the development can be ascertained. Two points along Weston Road, one being on the southern pavement close to the Temple Road junction and the other being the Kingswood Road junction are included within this assessment and shown in the images below.



Figure 17: View from Weston Road/Temple Road junction



Figure 18: View from Weston Road/Kingswood Road junction

From both of these angles, the proposed development would obviously be visible. However, in both instances, the development would form part of the existing context, which also includes the Pocket Living development on Bollo Lane and the Chiswick Business Park buildings which lay in the background. In the context of the emerging pattern of development, the proposal would also be seen within the same context of consented or proposed development within the area. This includes the TFL Scheme (up to 25 storeys), 93 Bollo Lane (resolution to grant) and the Stanley Road scheme (pending consideration). In addition to this, the proposed development has been intelligently designed to maximise the visual interest of the façade, with the high-quality design being represented within these views.

The proposed development would also be prominent when viewed from the Railway level crossing on Bollo Lane as shown within the image below. Whilst prominent as a standalone building, this would also form part of the same view as the current proposal for Stanley Road, which is pending consideration. In terms of the emerging context, there are a number of schemes either approved or under construction on Bollo Lane, of which the proposed development would be consistent with, in terms of its overall visual impact.



Figure 19: View from Bollo Lane/Railway junction

From within the industrial estate itself, particularly given the low-rise nature of the existing buildings, the proposal would represent a prominent addition to the skyline. However, it must be noted that the existing estate has limited architectural merit, and the overall design of the proposed development would have a positive impact on the surrounding area, particularly given the high quality design of the proposal.

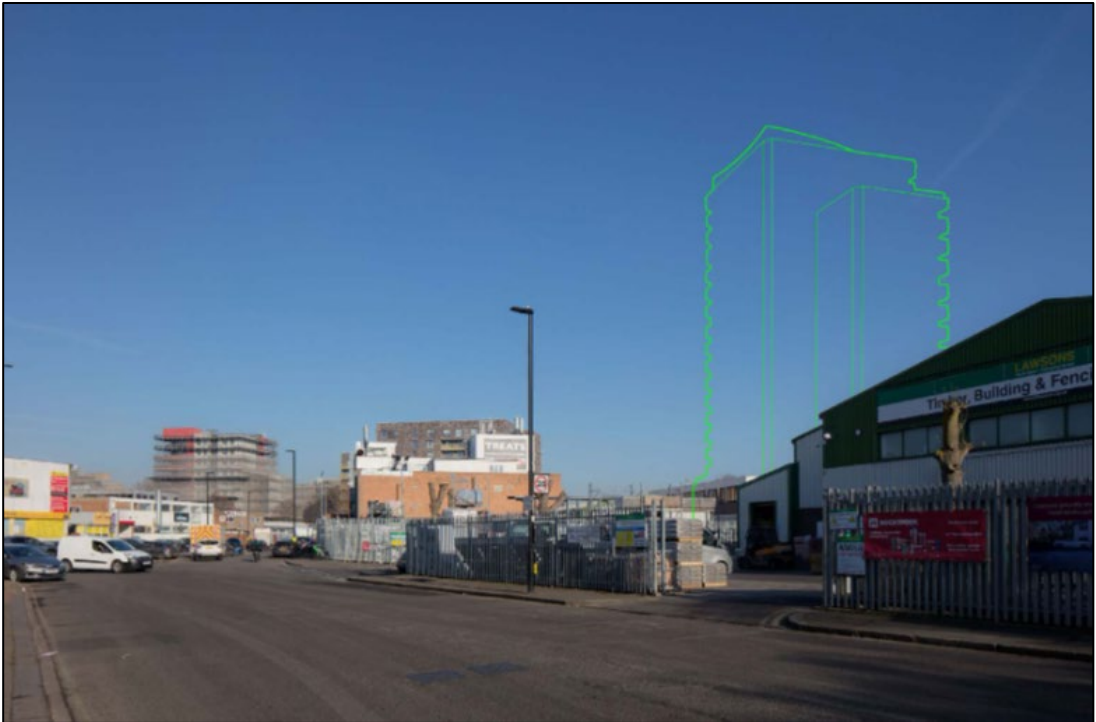


Figure 20: View from Colville Road

When viewing the site from the north, the proposed development fits within both the existing and emerging context of the surrounding area. Several areas were selected in and around Acton Gardens, as shown within the images below.



Figure 21: View from Bollo Bridge Road/Stanley Road junction



Figure 22: View from Whelan Road (Acton Gardens)



Figure 23: View from South Acton Park

In the first two images, the development can be seen in long-range views and can be considered to be consistent with the existing context, particularly buildings currently under construction along Bollo

Lane and the existing Pocket Living Scheme. From South Acton Park, as shown in the third image, the proposed development would be screened by the established built form surrounding the park.

Impacts on Heritage

Policy HC1 of the London Plan outlines that development proposals affecting heritage assets and their settings should be “sympathetic to the asset’s significance and appreciation within their surroundings”. Development proposals should avoid harm and identify enhancement opportunities. Paragraph 199 of the NPPF states that “great weight should be given to an assets conservation...which is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance”.

Whilst the site is not located within a Conservation Area, nor it is within the vicinity of any listed buildings, being a tall building, the development may be visible from longer-range designated heritage assets. Given the location of the application site, the only heritage assets that could be harmed by the proposal would be the Acton Green Conservation Area and the Bedford Park Conservation Area.

The Townscape and Visual Impact Assessment that has been carried out which includes various points within both of these Conservation Areas. The first image shows a view of the proposed development from Acton Green Common, located within the Conservation Area, with a linear view of the site up Cunnington Street.



Figure 24: View from Acton Green Common

Whilst the site would be visible, it too would be visible within the context of emerging development occurring within the LSIS. Notwithstanding this, the Conservation Area Appraisal for Acton Green notes that the CA has “evolved around the green, along Acton Lane on the eastern side, along South Parade on the northern side and along Hardwicke Road on the south-western side”. That is, that the special historic character of the area is around the lower density buildings along Acton Lane and South Parade that are spatially arranged around Acton Green Common. The view shown in the image above is located within the Conservation Area, but the majority of this particular view is not. The view is not identified as a ‘key view or vista’ within the Appraisal and the proposed development would accordingly not have a significant impact on the character, appearance or setting of the Acton Green Conservation Area.

Views were also analysed from within the Bedford Park Conservation Area, along Bedford Road and Marlborough Crescent. However, a combination of both the distance between the application site and the Bedford Park CA (approximately 1km), as well as the established built form, the proposed development would not be visible within the skyline on views within this CA.

Views from Gunnersbury Park and the adjacent cemetery were also reviewed, which show only momentary glimpses of the proposed development. Nevertheless, post-development both the park and cemetery would retain their open character and it is not considered that the proposal would result in any significant harm to the historic or heritage significance of these sites.



Figure 25: View within Gunnersbury Cemetery



Figure 26: View within Gunnersbury Park

In accordance with the tests outlined within the above assessments, the scheme would represent less than substantial harm to designated heritage assets. In line with Paragraph 208 of the NPPF, “this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”. The public benefits of the proposal have been outlined previously within this report and it is accordingly considered that the proposed development would be acceptable in relation to heritage impacts.

Housing Mix

Policy H10 of the London Plan outlines that schemes should include a range of unit sizes. As indicated in the table below, the proposed development would provide for a healthy mix of housing-types with a mix of 1-, 2- and 3-bedroom units. There are also a good mix of bedroom sizes within each of the proposed homes.

Housing Type	No. of Homes	Percentage
1b1p (studio)	16	12.9%
1b2p	27	21.7%
2b3p	19	15.4%
2b4p	30	24.2%
3b5p	32	25.8%
TOTAL	124	100%

Council would typically class 2b4p homes and greater as those being able to accommodate families.

The proposed development would represent 62 family homes, or 50% of the total proposal, representing a good outcome for families within the Borough.

Affordable Housing

In relation to affordable housing, Council and London Plan objectives are to maximise the delivery of affordable housing, which is guided by Policy H4 of the Publication London Plan. Policy H5 sets a minimum threshold of 35%, which is calculated by habitable room. On sites that result in a net loss of industrial capacity, a higher threshold of 50% is identified, however this is not relevant in this instance. The Ealing Core Strategy sets a borough-wide strategic target of 50% affordable housing.

In addition to this, the Draft Ealing Local Plan (Reg19) Policy HOU states a minimum threshold of 40% for eligibility for the fast-track route with a desired tenure split of 70/30 in favour of affordable rent products to intermediate provision. Given the status of the current Draft Local Plan, this policy would not hold as much weight as the existing London Plan and Ealing Development Management DPD, which together require a minimum of 35% affordable housing calculated by Habitable Room and a tenure split of 60/40. The tables below illustrate the affordable housing offer.

Affordable Housing by Unit Number

Housing Type	Private Market	London Affordable Rent	Shared Ownership
1 bedroom	30	9	4
2 bedroom	29	11	9
3 bedroom	22	6	4
Total Homes	81	26	17
Percentage	65.3%	21%	13.7%
Cumulative	65.3%	34.7%	

Affordable Housing by Habitable Room

Housing Type	Private Market	London Affordable Rent	Shared Ownership
1b1p	16	0	0
1b2p	28	18	8
2b3p	39	18	0
2b4p	48	15	27
3b5p	88	24	16
Total HRs	219	75	51
Percentage	63.5%	21.7%	14.8%
Cumulative	63.5%	36.5%	

Tenure Split – Unit No. and HRs

Housing Tenure	No. of Homes	No. of HRs	% Homes	% HRs
London Affordable Rent	26	75	60.5%	59.5%
Shared Ownership	17	51	39.5%	40.5%
Total	43	126	100%	100%

Tenure Split – Floorspace

Housing Tenure	No. of Homes	Amount of Floorspace	% Floorspace
London Affordable Rent	26	1,753sqm	59.1%
Shared Ownership	17	1,212sqm	40.9%
Total	43	2,965sqm	100%

Based off the tables above, the proposal would deliver Affordable Housing at a rate of 36.5% by HR (34.7% by unit number). This would exceed the requirements as outlined within the London Plan for consideration under the Fast Track Route. In terms of the tenure split, this is consistent with the objectives of the current Ealing Development Management DPD policy with a split of 60/40 in favour of London Affordable Rent over Shared Ownership. This is accordingly a good offer and would increase the availability of genuinely affordable homes on a site that is well-connected to established public transport nodes and is located in an emerging mixed-use community.

Council’s Housing Team would generally consider 2b4p+ homes as being able to accommodate families. The scheme would accordingly provide 11 family homes within London Affordable Rent tenure and 13 family homes within Shared Ownership tenure.

Quality of Accommodation

Policy D6 of the London Plan states that housing development should be of a high quality design and provide adequately sized rooms and floor spaces, in accordance with Table 3.1 of this policy. Residential accommodation should have comfortable and functional layouts, which are fit-for-purpose to meet the different needs of Londoners.

The table below provides an assessment of the proposed residential accommodation against the minimum standards of Policy D6.

Housing Typology	No. of Homes	Required	Proposed Range	Complies?
1b1p (Studio)	16	37sqm (39sqm*)	41sqm	Yes
1b2p	27	50sqm	50sqm-53sqm	Yes
2b3p	19	61sqm	65sqm-71sqm	Yes
2b4p	30	70sqm	72sqm	Yes
3b5p	32	86sqm	87sqm-94sqm	Yes

*- Where a bath instead of a shower is proposed

As per the above table, the proposed residential accommodation would provide good quality living conditions for future residents. All rooms would meet the space and dimension requirements of both Policy D6 of the London Plan as well as the Mayors Housing Design Standards LPG (June 2023).

The image below shows a typical floor layout within the proposed development.

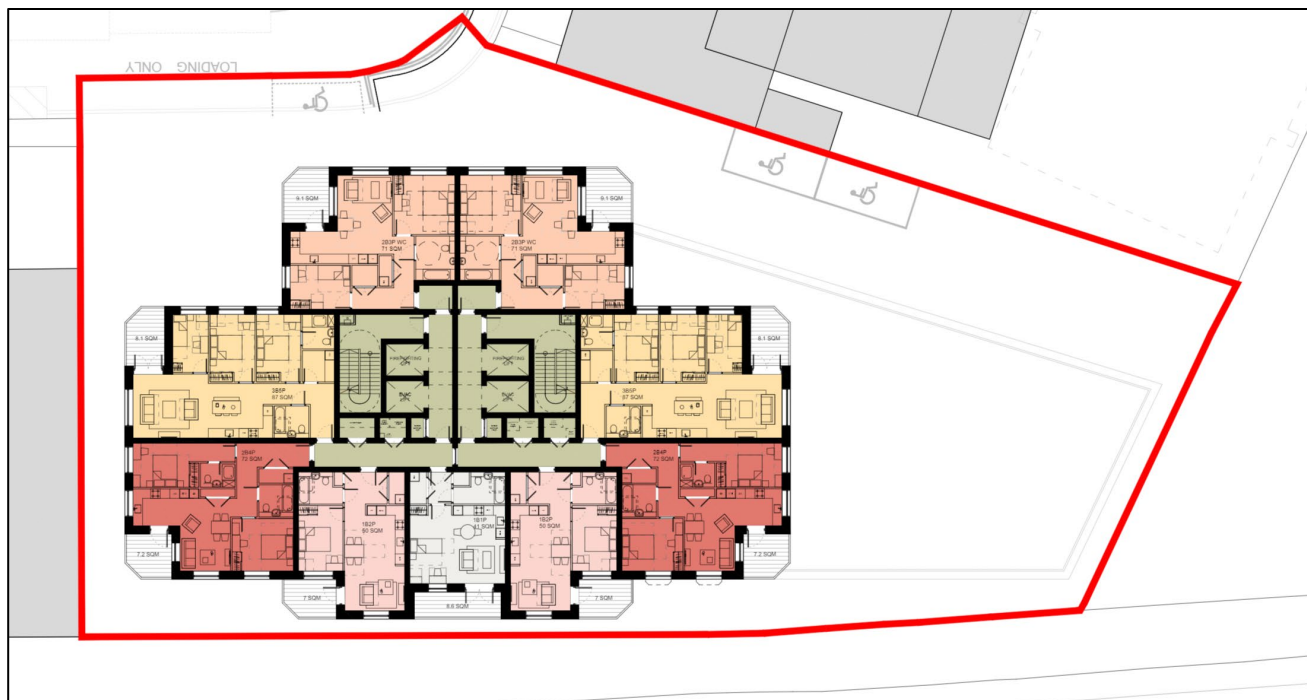


Figure 27: Typical Floor Plan Layout

The design intelligently exploits the form of the building to increase the amount of dual aspect homes. Based on this, the proposal provides for dual aspect homes at a rate of 70% (87 homes). Of the 30% (37 homes) of the homes that would be single aspect, a significant portion of these would be ‘enhanced single-aspect’ meaning that they would contain openings facing two different directions but would not meet the definition of a dual-aspect home, as defined by Mayors Housing Design Standards LPG (June 2023).

All, except for one, of the single-aspect homes would be south-facing, ensuring that these homes would have the maximum amount of exposure to direct sunlight as possible. The submitted Daylight and Sunlight also confirms that all of the proposed homes would provide a high level of a compliance for both Illuminance Factor and No-Sky Line tests (88% and 95% respectively).

Policy 7D of the Ealing Development Management DPD seeks to ensure that all new homes are provided with adequate private amenity space. The rate at which private amenity space should be provided is 5sqm for a 1-2 person flat, with an additional 1sqm per additional occupant. All of the proposed homes would be provided with balcony space, which meets or exceeds the minimum requirements, as demonstrated within the table below.

Housing Typology	No. of Homes	Required	Proposed Range	Complies?
1b1p (Studio)	16	5sqm	8.6sqm	Yes
1b2p	27	5sqm	7sqm-9sqm	Yes
2b3p	19	6sqm	7sqm-9.1sqm	Yes
2b4p	30	7sqm	7.2sqm	Yes
3b5p	32	8sqm	8.1sqm-9.1sqm	Yes

Policy D7 of the London Plan requires that at least 10% of all homes are to meet Building Regulation requirement M4(3) to be classed as 'wheelchair accessible dwellings' with all other homes to meet Building Regulation Requirement M4(2) to be classed as 'accessible and adaptable dwellings'. The Schedule of Accommodation submitted shows compliance with this requirement, with 12 x 2-bedroom homes to meet the standards of Building Regulation M4(3). Wheelchair compliant housing would also be provided over a mix of tenures, with 50% of the homes to be for private market sale and 50% to be within London Affordable Rent tenure. Final compliance with both of these requirements shall be secured through planning condition.

Council's Pollution-Technical Officers have also reviewed the scheme and recommended appropriate conditions with relation to noise, air quality and contaminated land, to ensure that future residents would be provided with appropriate mitigation to not only ensure good quality living conditions, but also comply with the Agent of Change principles.

It is accordingly considered that all new residents would be provided with high quality homes and provide for good quality living conditions with the highest standard of amenity. The proposal would accordingly comply with the requirements of Policy D6 of the London Plan, Policy 7A and 7D of the Ealing Development Management DPD and the Mayors Housing Design Standards LPG (June 2023).

Amenity Space

Development proposals are required to make provision for private and communal open space, in accordance with Policy 7D of the Ealing Development Management DPD. In addition to this, development proposals should make provision for children's play space, in accordance with Policy S4 of the London Plan. Furthermore, development proposals should provide for good quality landscaping and make a contribution toward improved urban greening of the space.

Communal Open Space

As detailed earlier within this report, each of the proposed homes would be provided with private amenity areas, typically in the form of balconies. Each of the proposed spaces would meet or exceed the minimum standards of Policy 7D of the Ealing Development Management DPD, providing good quality living conditions for future residents.

It is also a requirement of Policy 7D that communal amenity spaces should also be provided. Cumulatively with the proposed private amenity areas, total amenity provision for the development should equate to 15sqm per home. In the case of this development, the proposal should deliver amenity space of 1,860sqm. The total amenity provision would equate to 1,585sqm, resulting in a shortfall of 275sqm. As is allowed for under Policy 7D, this shortfall will be made up through a financial contribution that is outlined within the recommended Heads of Terms. This space is not inclusive of the proposed children's play space areas, which will be discussed within the section below.

The financial contributions secured through this scheme could be used by the Council to deliver increased public open space within the local area to serve the needs of this emerging community. Opportunities to increase public open space are detailed within the South Acton LSIS Masterplan and also shown within Figure 6 of this report.

The communal amenity spaces proposed are considered to be high quality and podium and roof levels are appropriately and intelligently exploited to provide a varied typology of amenity spaces throughout the development. At ground floor level, public open space with intensive tree planting would make an attractive frontage to the building and provide opportunities for both residents and the public to use this space. This space would also be continued along in a linear direction on the southern side of Greenock Road as part of any future development of this area of the LSIS.

Other amenity spaces proposed include the podium above the industrial space within the development at third floor level and on top of each of the shoulders of the building. Collectively the spaces would provide different opportunities for play and recreation, with the higher level roof terraces offering panoramic views of London.



Figure 28: Landscaping and Amenity Space Proposals

The spaces proposed are also considered to be high quality, with a number of indicative drawings on how this space will be laid out shown in the images below.



Figure 29: Third Floor Podium



Figure 30: Roof Terraces at 12th and 15th Floors

The space provides for the potential for urban gardening, raised planters providing lush vegetation, pergolas with climbing plants for seating and appropriately high screening of these spaces to shield them from the wind. Full details of the proposed hard and soft landscaping of these spaces will be required to be submitted by condition.

Children’s Play Space

Children’s play space is required to be provided at a rate of 10sqm per child, with the projected child yield based on an established population yield calculated produced by the GLA. Based on this, the projected child yield for the development is anticipated to be 48.2, thereby requiring 482sqm of children’s play space to be provided. A total of 105sqm of children’s play space would be provided

which would all be dedicated to younger age groups. The projected split in age groups would be 47% for 0-4 year olds and 34% being between the ages of 5-11.

The children’s play space proposed would be a mix of both active and informal play. Whilst the applicant has noted on the below image that other areas of the development could be considered for informal play, this has been discounted from overall play provision as this is mainly attributed towards communal amenity areas. The play area would be located on the third-floor podium as shown in the darker line in the image below. Full details of the children’s play space would be required through planning condition.



Figure 31: Childrens Play Space

It is noted, based on the projected child split, that the space requirement would be 226sqm for 0-4 year olds. Whilst there is a shortfall in this provision, this shortfall would be secured through financial contribution, which could likely be used to deliver publicly accessible children’s play space within the Masterplan area, as identified by Figure 6.

Policy S4 of the London Plan states that play facilities for older children (such as the 5-11 age group) can be provided through off-site provision, where existing open space and play facilities are within “400m of the development and be accessible via a safe route from children’s homes”. In this instance, the South Acton Park/Recreation Ground which is some 250m from the application site. Financial contributions, that are detailed within the Heads of Terms, would allow Council to improve the existing facilities here for the benefit of both existing and future residents. Safer and more accessible routes to South Acton Park will be provided through the required upgrades to Greenock Road, which will not allow occupation until this road is completed to an adoptable standard.

Overall, the total children’s play space, whilst representing a shortfall, would be an acceptable outcome for this site, particularly given its constrained nature and would comply with the objectives of Policy S4 of the London Plan.

Landscaping and Urban Greening

Policy G5 of the London Plan states that major developments should contribute to the greening of London “by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping, green roofs, green walls and nature based sustainable drainage”.

The existing site and its surrounds are generally devoid of any significant green spaces or landscaping and accordingly the proposal will result in a significant improvement on the existing situation. The image below shows the methods to increase green spaces within the development. These include the use of green roofs, intensive planting in amenity areas, increased habitat and rain gardens at ground floor.

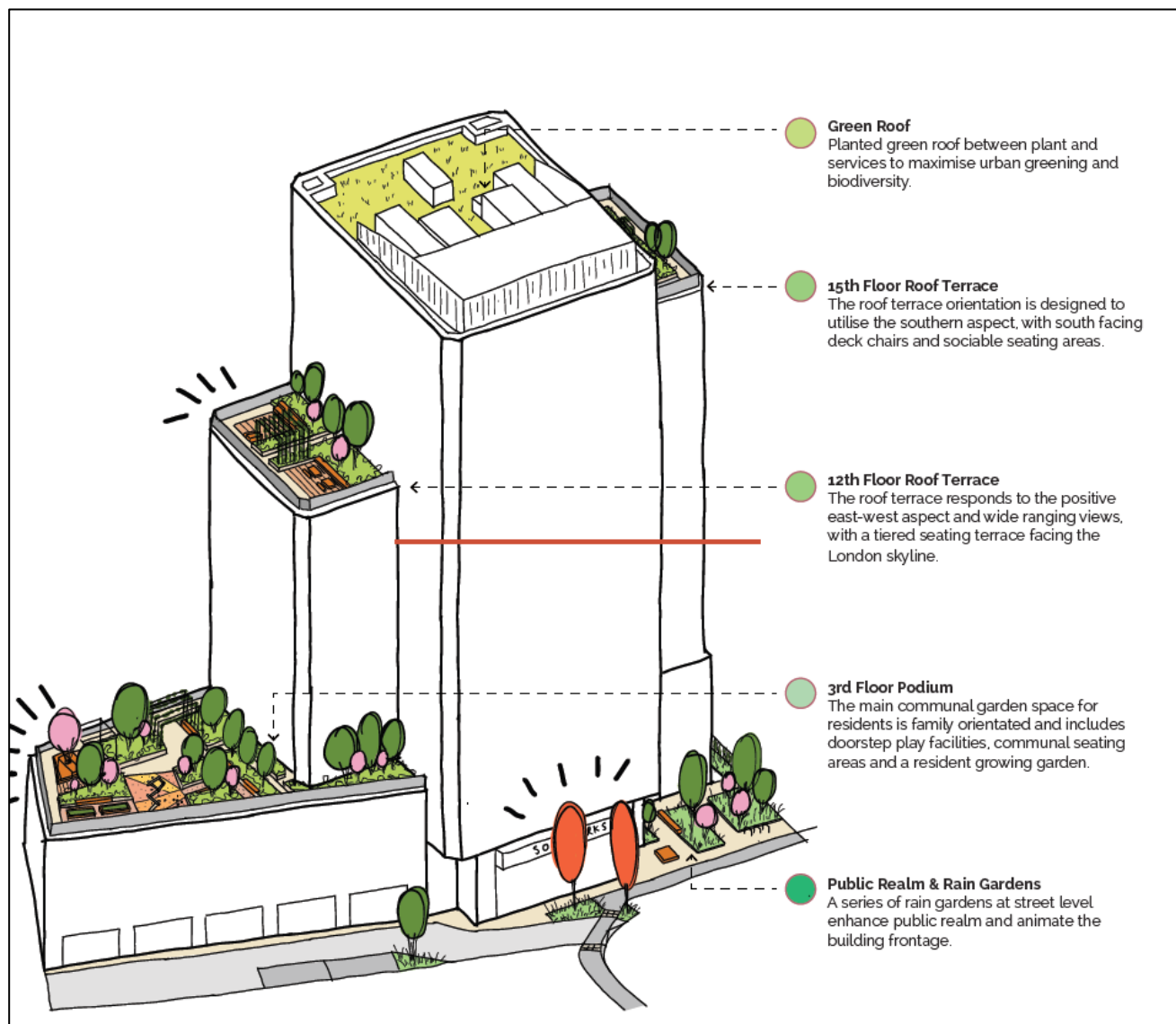


Figure 32: Spatial Layout of Landscaping

Policy G5 of the London Plan also states that in relation to the Urban Greening Factor, “the Mayor recommends a target score of 0.4 for developments that are predominately residential”. The

measures taken within the proposed scheme to maximise the level of urban greening delivers a UGF of 0.4, which complies with this requirement. The GLA also acknowledges within their Stage I response that the proposal meets the required target.

Impact on Allotments

To the north-east of the site exists the South Acton Allotment Gardens. Council Officers through pre-application discussions, as well as the Design Review Panel and Community Review Panel, advised the applicant that any development of this site should not impact the viability of the allotment gardens to ensure their effective and continued operation as an important community asset. This has resulted in significant design changes to the form, bulk, scale and massing of the building to minimise and mitigate any impact. This was also a significant concern of the community as raised within the consultation period for the application.

Given the sensitive nature that direct sunlight has to the allotment gardens, Council has tested the findings of the applicant Daylight, Sunlight and Overshadowing Report against the Royal Horticultural Society's growing guidelines. This advice states that the majority of crops require 'full sun' or 'partial or semi-shade', with 'full sun' meaning more than 6 hours of direct sunlight and 'partial or semi-shade' meaning 3-6 hours per day of direct sunlight. Council has applied this standard as it is stricter than the conventional BRE Guidance.

The applicant's DSO Report shows that based on the existing situation, the "sun on the ground" analysis shows that on the 21 March, the allotment gardens receive 571 minutes (9.5 hours) of direct sunlight. Post development, the area would experience a slight reduction to 487 minutes. However, this would still equate to 8.1 hours, significantly exceeding the guidelines set by the Royal Horticultural Society.

The impact of the proposed development is accordingly expected to be minimal.

Impact on Neighbouring Properties

Policy 7B of the Ealing Development Management DPD seeks to ensure that new development does not give rise to significant adverse impacts on neighbouring properties, with respect to overlooking, loss of light, privacy, noise and a sense of enclosure. Council Officers acknowledge some of the concern raised by representations through the consultation period with respect to the impact of the proposed development on the living conditions of nearby properties.

Whilst the proposed development is largely industrial in character, to the south of the site lies the conventional residential neighbourhood of Acton Green/Chiswick. Those that would be primarily impacted by the proposed development are those on the northern side of Weston Road, which has north facing gardens that adjoin the rail corridor. As noted earlier in this report, by virtue of the existing rail corridor, the separation distance between the rear boundary line of Weston Road properties and the application site ranges from between 35 and 49 metres. It is also acknowledged that given the low rise nature of the current site, there would be a visual impact experienced when viewed from the rear gardens and rear-facing windows of these properties, as a result of the proposed development.

With respect to Daylight and Sunlight, the applicant's DSO report has been prepared by a suitably qualified professional and outlines the impact of the proposed development with respect to BRE Guidance.

Daylight

VSC (Vertical Sky Component Guidance) is a common test used in determining the impact of a proposed development on daylight to nearby buildings. The VSC measurement quantifies the amount of available daylight, received at a particular window and measured on the outer pane of the window. BRE Guidance recommends a total VSC of 27%, or that the reduction is no more than 20% of its former value. This is at a point which is considered to be 'noticeable' but not necessarily 'detrimental'. BRE/VSC guidance should not be applied in a mechanicalistic way and is purely advisory. Non-compliance does not inherently mean that a proposal would have a significant impact.

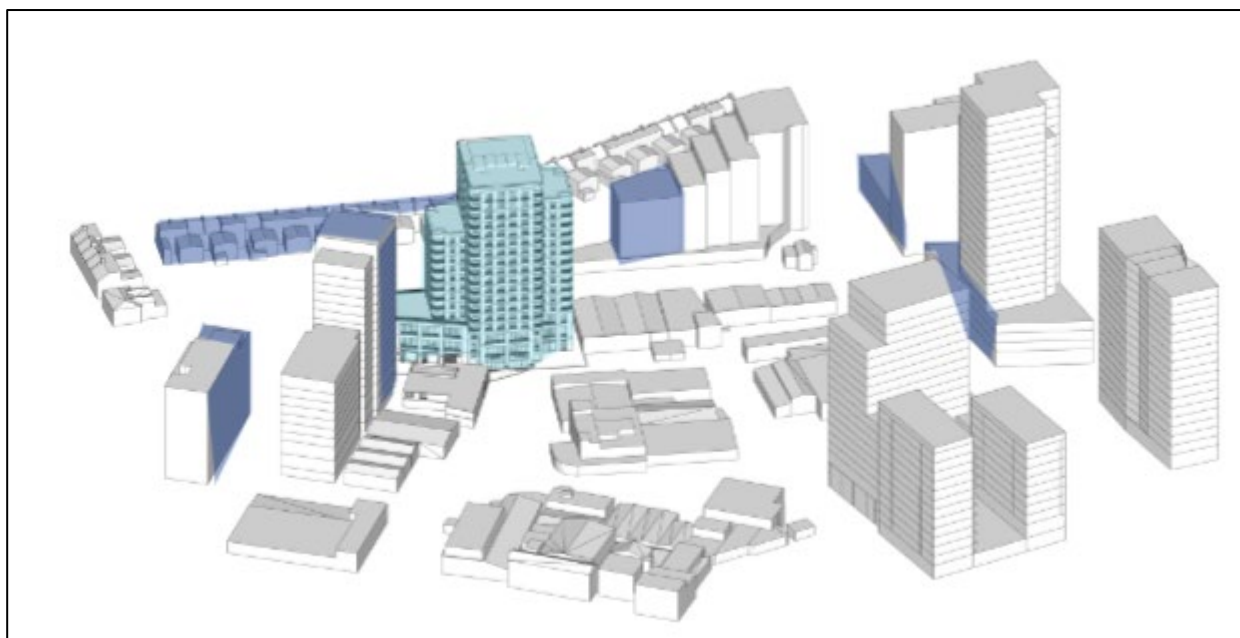


Figure 33: Location of Windows Tested for Daylight

In any case, when reviewing properties on Weston Road (nos. 10-44), of the windows reviewed, 56 of the 67 windows tested achieved full compliance with VSC criteria. Of the windows that did not comply, the results showed typical reductions to their former value of 70-79%, marginally below the target of 80%. This is considered to be a good outcome, particularly given the existing low-rise character of the application site and the site's urban location.

Other buildings were also tested with respect to daylight, including proposed developments at 93 Bollo Lane and 'Land at Stanley Road' which showed very high levels of compliance with BRE Criteria. There was no impact experienced at Wodehouse Court, the Bollo Lane TFL development or 102 Bollo Lane (Pocket Living).

Sunlight

The availability of sunlight is dependent upon the orientation of a window or area of ground being assessed relative to the position of the sun. As such, BRE Guidance states that only windows that are within 90 degrees of due south are needed to be assessed. The proposal would accordingly have no sunlight impact on any residential properties on Weston Road.

The only windows that were determined to be potentially impacted by the proposed development were within Wodehouse Court and 'Land at Stanley Road' which is a current planning application pending consideration. In the case of sunlight, APSH (Annual Probable Sunlight Hours) is the most relevant test. APSH represents the sunlight that a given window may expect over a 1 year period. This is expressed as a percentage of direct sunlight hours, divided by the number of hours when the sky was clear with sun. The measurement is taken from the outside face of a window. This measurement is taken in both summer and winter months. As stated within BRE Guidance "the window should receive at least 25% of available sunlight hours and 5% during the winter months, and 80% of its former value".

With respect to this measurement, a total of 249 windows were tested, with the analysis indicating 95% compliance for APSH and 83% in the winter. This is a high level of compliance for an urban location. There was full compliance within the existing Wodehouse Court, with 'Land at Stanley Road' experiencing some marginal impacts, with not a significant deviation from the guidance.

Overshadowing

It is not considered that there is any significant overshadowing of any neighbouring residential property, including the rear gardens of properties on Weston Road. This is as the proposed development is predominantly located to the north of those properties on Weston Road. The impact of overshadowing on the allotment gardens is assessed within the section above.

Overlooking

Within the objections to the scheme received as part of the consultation period, a number of residents were concerned with the degree of overlooking caused by the proposed development. This was primarily related to the overlooking of rear gardens on Weston Road. As has been noted, the separation distance between the application site is on average approximately 40 metres. Whilst the current London Plan gives no strict guidance in relation to overlooking, the Mayor's Housing SPG (Standard 28) notes that in relation to privacy that "planning guidance for privacy has been concerned with achieving visual separation between dwellings by seeking a minimum distance of 18-21 metres between facing homes...these can still be useful yardsticks for visual privacy".

The separation distance between rear gardens on Weston Road and the proposed development, created by a wide railway corridor, are comfortably within a degree of acceptability with relation to the impact on privacy and increased overlooking. Whilst it is acknowledged that there may be a perception of overlooking, particularly when comparing to the existing situation, it is not considered that would be to a degree that would be detrimental to the living conditions of nearby residents.

Overall, it is not considered that the proposed development would detrimentally harm the living conditions of any existing residents surrounding the site and, on these grounds, the development is considered to be acceptable.

Transport Considerations

A key concern in the assessment of this application is the accessibility of the site, particularly given the poor condition of Greenock Road. The existing road operates a dual carriageway, with no clear defined footpath and parking and loading occurs in a haphazard manner. The road is currently owned by Council but does not form part of the adopted highway network. A recommendation has

been made within the Heads of Terms which would require the developer to fund the costs of the design work to bring the road to an adoptable standard. The developer would then be responsible for the costs of the construction of the road in full and indicative costs of this work has been provided to the applicant for their consideration, which has been agreed.

The applicant had initially proposed that the road would only be constructed to the site from the closest junction with Colville Road. An indication of the applicant’s initial plans is provided in the image below.



Figure 34: Indicative Upgrades to Greenock Road

Key elements of the proposal are changing the road to a one-way system, which is considered appropriate in this instance, given that Greenock Road forms a loop that has junctions at both ends with Colville Road. The necessity for the road to be two-way does not necessarily exist. Reducing the width of the carriageway also allows the potential for a 2m wide footpath to access the site from Colville Road. The location of any on-street parking or loading areas will be subject to detailed design with Council’s Highways Team, as required by the s106 agreement Heads of Terms. The South Acton LSIS Masterplan also considers that this general arrangement is essential for the delivery of the Masterplan.

Whilst the applicant has only initially proposed to undertake the works shown on the image above, it is considered that to provide justification for the marginal increase in height above the recommendations of the Masterplan, that the applicant should be responsible for the construction of the entire road between both Colville Road junctions. This has been agreed to by the applicant and further justification of this is provided within an earlier section of this report.

Council Officers also requested that in relation to deliveries and servicing, that the applicant should work closely with the applicant of a proposal at Land Opposite Ravenswood Court, Stanley Road (195284FUL). A strategy has been developed, as shown in the image below, to show how access

arrangements for servicing could be consolidated between the two sites. It is considered that this would work successfully, should both schemes be delivered. It is also important to note that the servicing arrangements currently proposed would also work effectively, were the scheme on the adjoining site not delivered.

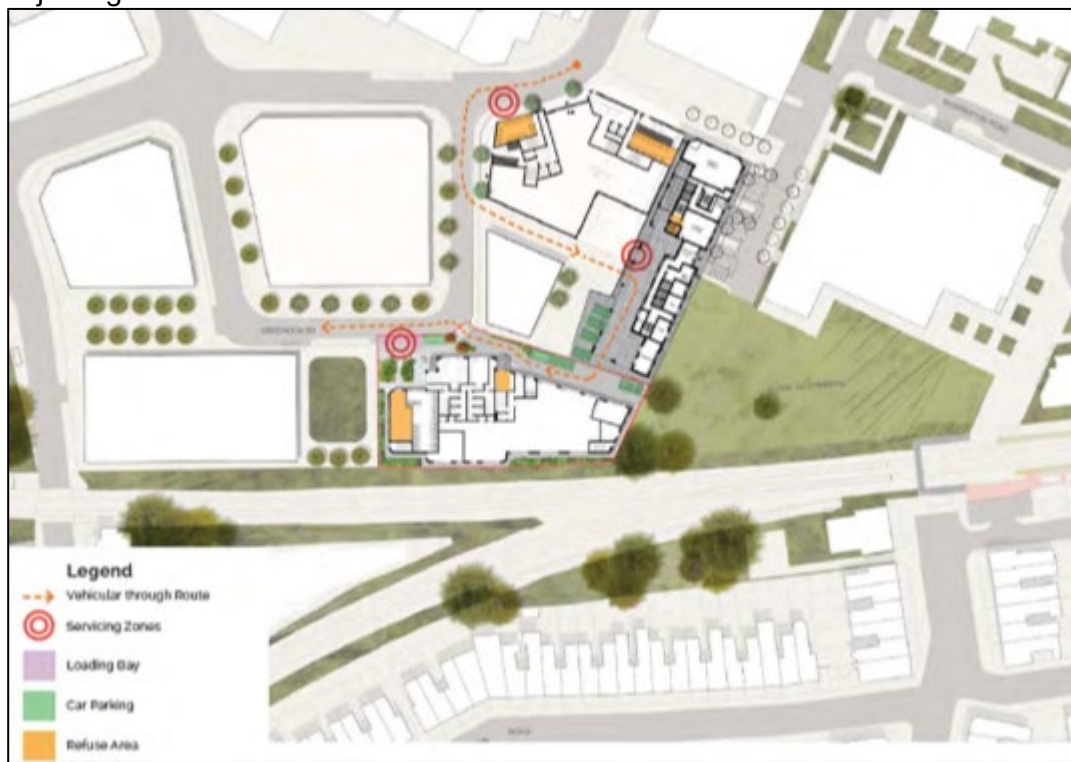


Figure 35: Consolidated Servicing Arrangements between Two Proposed Developments

Deliveries and Servicing Plans, as well as Travel Plans are also required to be submitted through planning condition.

The application site is located within a Controlled Parking Zone (CPZ). As required by Policy T6 of the London Plan “car-free development should be the starting point for all development proposals in places that are (or are planned to be) well connected by public transport”. In line with this requirement, given the proximity of the site both to a London Underground and Overground Station, car-free development is appropriate in this instance. Future occupants would be restricted from obtaining parking permits or visitor vouchers within the CPZ, which will encourage a modal shift to more sustainable forms of transportation.

Policy T5 of the London Plan outlines requirements for cycle parking to be provided. The policy requirements are outlined in the table below.

Use	Rate	Requirement
Residential – Long Stay	1 space per studio 1.5 spaces for 1b2p dwelling 2 spaces for all other dwellings	218 spaces
Residential – Short Stay	5-40 dwellings = 2 spaces Thereafter 1 space per 40 dwellings	4 spaces
Industrial – Long Stay	1 space per 500sqm	5 spaces

Industrial – Short Stay	1 space per 1000sqm	2 spaces
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Within the detailed comments from TfL, some concern was raised about the proposed main residential cycle parking area, particularly in relation to the amount of two-tier cycle parking racks, as well as the spacing between racks. TfL requested that the space be revised to provide more single level bicycle parking to accommodate residents with more limited mobility. Accordingly revised plans have been received, as well as a comprehensive response to TfL’s comments.

Two cycle storage areas have been provided, one within a proposed basement providing 67 x 2 tier Sheffield cycles, 16 x Sheffield cycles and 5 adaptable spaces. An adequately sized lift has been proposed to bring cycles up to ground level from this space. At ground floor level, another cycle storage area is proposed, providing 100 x 2-tier Sheffield stands, 30x Sheffield stands and 5 x adaptable stands. Collectively, the proposal would deliver 223 long-stay cycle parking spaces, complying with Policy T5 of the London Plan.

At the front of the site, 6 racks providing space for 12 bicycles, would serve the needs of short-stay cycle requirements for both the industrial and residential uses. In addition, a separate locker for 12 long-stay cycle spaces for the industrial use would provide for adequate space that complies with Policy T5. It is therefore considered that cycle parking provision is acceptable.

Impact on the Railway

Network Rail provided a consultation response to the proposed development which summarised a number of concerns with relation to the proposed development. Many of these concerns fall outside the remit of a planning application, whereas others are reasonable and relevant to be included as conditions or informatives. These have been included within the recommendation.

The use of conditions and informatives where appropriate was the same approach taken within the assessment of a planning application at 93 Bollo Lane (214710FUL), which is currently awaiting legal agreement.

Refuse and Recycling Storage

Refuse storage capacity is provided by a well-established formula that calculates the required capacity for a residential development. Based on the housing mix proposed, the scheme would deliver the necessary requirement of 27,404L. The refuse storage area, which would be appropriately located close to Greenock Road for collection, would provide for 26 x 1,100L eurobins, providing a capacity of 28,600L. This would comply with the minimum requirements.

A separate space for the refuse and recycling storage for the café and industrial uses would also be provided. The developer would need to arrange for a private contractor to collect this refuse storage or seek a contract with LB Ealing’s Waste Services.

Energy and Sustainability

The proposed Energy Strategy has been reviewed by Council’s Energy Consultant, who is very supportive of the proposed energy/overheating strategy produced by HTA Design in March 2023 (version 2). The development is all electric with no gas infrastructure on-site. The strategy proposes a centralised Air Source Heat Pump distribution loop with electric boilers (for 5% peak load), to

provide space heating and DHW. Space cooling for the non-residential areas will come from VRF electric panels.

PV has been realistically maximised with a 20 kWp array.

The Council confirms that there is no available “Clean” district heat network (DHN). However, the energy plant room will be futureproofed for connection to any future DHN.

The Strategy has been assessed against Part ADL 2021 using SAP 10.2 emission factors, and follows the London Plan policy SI2/SI3 “Lean, Clean, Green” energy hierarchy.

The predicted Energy Use Intensity (EUI) is 56 kWh/m²/p/a for the residential element, and 75.8 kWh/m²/p/a for the non-residential space.

An Overheating Analysis report (stage 3) with proposed mitigation measures has been submitted. The analysis assumes full mechanical ventilation and heat recovery (MVHR). It is compliant with Part O (TM59/Guide A) and TM52, (non-domestic buildings), and follows the TM49 methodology of modelling against the DSY1 average summer year (2020) as well as the more intense (but non-mandatory) DSY2 (2003) and DSY3 (1976) data files. All rooms comply with the mandatory DSY1 modelling for criteria (a) and (b), with 38% meeting DSY2 and 23% DSY3. The corridor modelling achieved 100% against DSYs 1,2,&3.

At the current design stage the overall site-wide CO₂ emissions will be cut by at least 72.84%, with 15.79% carbon reduction through “Lean” efficiency measures, and 57% through “Green” renewable energy.

There is a shortfall of 961.7 tonnes CO₂ (over 30 years) in the zero-carbon that will be mitigated through an “offset” S106 payment at £95 per tonne to the Council of £91,360. For information, the carbon offset amount saved through the renewable energy equipment is £191,500.

If after one year of in-situ monitoring the renewable energy systems do not deliver, within a reasonable margin of error, the carbon reductions predicted in the Energy Strategy then the Developer will need to pay an additional Carbon Offset contribution to mitigate some or all of the shortfall.

The London Plan (policy SI2) introduces a fourth step to the existing (be Lean, Clean, Green) energy hierarchy of “be Seen”. In addition to the GLA 'be Seen' policy, Ealing Council also requires the additional physical monitoring and performance analysis of the renewable/low-carbon energy equipment. Ealing already implements, and separately conditions, this requirement through its Development Management (2013) DPD policy E5.2.3. The monitoring is carried out by the Council's chosen provider (Energence Ltd) using the Automated Energy Monitoring Platform (AEMP). A S106 payment will be sought for the implementation of the energy monitoring policy.

In line with this, Ealing Council will require the monitoring of the PV array and the centralised Air Source Heat Pump loop to evaluate their performance/efficiency for a period of 4 years. Monitoring the heat pumps will involve metering the heat output and the combined parasitic loads. Suitable monitoring devices must be fitted by the Applicant to achieve this.

The WLC strategy produced by HTA Design in March 2023 (v3) confirms that the development is compliant with the GLA Benchmark targets. Modules A1-A5 should achieve 788 KgCO₂e/m², and B1-C4 (excluding B6/B7) 301 KgCO₂e/m², with a total carbon emissions baseline scenario (over 60 years) of 1,026 KgCO₂e/m² (including module D and sequestration benefits).

The Circular Economy statement produced by HTA Design in March 2023 (v2) confirms that the development will be compliant with the London Plan targets of diverting 95% of

demolition/construction waste from landfill, putting 95% of excavation materials to beneficial on-site use, and supporting the diversion of 65% of Operational Waste from landfill by 2030.

Environmental Health

Noise

As outlined within the Agent of Change section of this report, the existing acoustic environment has been robustly assessed by the applicant through monitoring. The results of this acoustic assessment will be used as a basis to determine the appropriate level of sound insulation of the external building fabric, to ensure that the internal living conditions meet relevant British Standards.

Council's Pollution-Technical Officer has reviewed the Environmental Noise Assessment and Agent of Change Assessment and is satisfied with the conclusions of this report. Accordingly, the officer has recommended an appropriate condition to secure the details of the external building fabric prior to commencement of the superstructure.

Other conditions have also been recommended for internal sound insulation between the industrial and residential uses, as well as between communal spaces and residential properties and between individual residential homes.

Air Quality

Council's Air Quality Officer has reviewed the submitted details and recommended a number of conditions, including a ventilation strategy to ensure that new residents would be provided with fresh air ventilation to mitigate poor air quality within the surrounding area. The Officer also notes that the emergency generator is located on the ground floor and the submitted Air Quality Assessment does not consider the impact of emissions during times in which the generator is tested on AQ concentrations. This may affect areas of the façade that will likely face the flue for the generator.

Contaminated Land

Council's Contaminated Land Officer has reviewed the Phase 1 Risk Assessment, prepared by IDOM. The report recommends that a Site Investigation is undertaken to determine the extent of contaminated land within the site, particularly given its historic industrial uses. The Contaminated Land Officer agrees with this recommendation and has accordingly recommended conditions, including a Site Investigation, Remediation Scheme and a Verification Report.

Crime Prevention

London Plan Policy D11 states that Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime.

The Metropolitan Police have been consulted, who have advised that the development should achieve Secure by Design accreditation, which has been recommended as a condition.

Conclusion:

The proposed development represents a high-quality design that would demolish the existing poor quality buildings and replace these with a co-located industrial and residential development. The proposed industrial space provides both an uplift in the amount of industrial floor space with Use Classes E(g)(iii)/B2 and B8, in line with the requirements of the London Plan and the Reg19 Draft Ealing Local Plan. This will provide high quality space that will either provide space for a single end user within these use classes, or be flexible to allow for a variety of different occupants within the space.

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 18 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'. The application site is served by the unadopted Greenock Road, which is currently in a poor condition. The applicant would be required to construct the road to an adoptable standard at their own expense, and improvements to this road are identified as a necessary public realm improvement for the delivery of the Masterplan. The road would likely be delivered with a one-way system, with widened and delineated footpaths, street trees, lighting and more formalised parking and loading arrangements. The scheme would also deliver additional open space at the front of the site that goes beyond what has been identified within the Masterplan. It should also be noted that the 18 storey height of the building is only located within the central section, with the two shoulders and podium levels falling within the specified height limit.

The scheme will deliver high quality homes for future residents, in a location that is well-connected to existing public transport nodes. All of the homes would provide internal and external living spaces that meet the relevant space standards and residents would have good access to different communal areas that would integrate landscaping, open space and children's play space.

The design of the proposed development is considered to be high quality, utilising lower and set in shoulder elements that would reduce its bulk, scale and massing. The materiality of the scheme is considered to be high quality that provides significant visual interest, whilst also referencing the heritage of the area as a location of industry.

Overall, it is considered that the scheme complies with all relevant local, regional and national planning policy and it is recommended that the application be approved, subject to Stage II GLA referral, conditions and s106 agreement.

Human Rights Act:

In making your decision, you should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as the London Borough of Ealing to act in a manner, which is incompatible with the European Convention on Human Rights.

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 of the grant of permission 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 proportionate in response to the submitted application.

Appendix A

Description of the conditions/reasons:

COMPLIANCE

1. **Statutory Timeframes**

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 drawing title numbers:

AP00 P04 (Proposed Ground Floor); AP01 P04 (Proposed First Floor); AP02 P03 (Proposed Second Floor); AP03 P03 (Proposed Third Floor); AP04 P03 (Proposed Fourth – Eighth Floor); AP09 P03 (Proposed Ninth – Eleventh Floor); AP12 P03 (Proposed Twelfth Floor); AP13 P03 (Proposed Thirteenth – Fourteenth Floor); AP15 P02 (Proposed Fifteenth Floor); AP16 P02 (Proposed Sixteenth – Seventeenth Floor); APB1 P02 (Proposed Basement); APRF P02 (Proposed Roof Plan); 0250 P03 (Proposed North Elevation); 0250 P03 (Proposed East Elevation); 0253 P03 (Proposed West Elevation); 0900 rev D (Illustrative Landscape Plan); 2900 rev D (Ground Floor General Arrangement); 2901 rev E (Podium Level General Arrangement); 2902 rev E (Roof Terrace Level General Arrangement); 2903 rev D (Planting Strategy Plan rev D);

Air Quality Assessment (IDOM, March 2023); Daylight, Sunlight and Overshadowing Assessment (HTA, March 2023); Design Access Statement (HTA, March 2023); Energy and Overheating Assessment (HTA, March 2023); Whole Life Carbon Assessment (March 2023); Wind Microclimate Assessment (Ecolytik, March 2023); Geo Environmental Assessment Phase 1 (IDOM, March 2023); London Plan Fire Statement (BB7, March 2023); Planning Gateway One Fire Statement (BB7, March 2023); Environmental Noise Assessment (IDOM, March 2023); Sustainability Statement (HTA, March 2023); Healthy Streets Transport Assessment (RPS, March 2023); Agent of Change Assessment (IDOM, March 2023); Drainage Strategy and SUDS Management Statement (IDOM, March 2023); Economic and Industrial Assessment (Iceni Projects, March 2023); Schedule of Accommodation (HTA, Ref: DVP-GRE); Statement of Community Involvement (London Communications Agency, March 2023); Visual Impact Appraisal (Neaves Urbanism, March 2023); Affordable Housing Statement (Newsteer, March 2023); Heritage Statement (GJHP, March 2023); Planning Statement (Newsteer, March 2023); Travel Plan (RPS, March 2023); Circular Economy Statement (HTA, March 2023); Delivery and Servicing Plan (RPS, March 2023); Outline Construction Logistics Plan (March 2023); We Made That Study Analysis (DVP-GRE)

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

3. **Restriction of Commercial/Industrial Uses**

Notwithstanding the provisions of the Town & Country Planning (General Permitted Development) Order, 1995 as amended, or any future amendments, the industrial workspace at ground floor within both buildings hereby permitted shall be used only for purposes within Use Class E(g)(iii)/B2/B8 of the

Town & Country Planning (Use Classes) Order 1987 as amended, and for no other purpose, without the prior written permission of the local planning authority. The industrial workspace must be completed in full prior to the occupation of the proposed residential flats. The area identified as “café” on the approved plans shall only be used for purposes within Use Class E of the Town and Country Planning (Use Classes) Order 1987 as amended, and for no other purpose, without the prior written permission of the local planning authority.

Reason: To safeguard the industrial uses on the site in accordance with Policy 1.2(b) of the Ealing Development (Core) Strategy 2012 and Policy E7 of the London Plan (2021)

4. Secure by Design

The development hereby approved shall achieve Secure by Design Accreditation, in consultation with the Metropolitan Police Crime Prevention Design Advisor.

Reason: To ensure that opportunities to commit crime are reduced, particularly in relation to the approved apartment buildings that contain shared core entrances that serve more a number of dwellings; and in order that the new buildings incorporate appropriately designed security features, in accordance with policies D11 of the London Plan (2021).

5. Accessible Housing

10% of the approved residential dwellings and 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.

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 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.

6. Refuse Storage

Each of the refuse and recycling storage facilities hereby approved for the residential and industrial elements of the development shall be implemented and operational before the first occupation of the relevant residential section they would serve, and permanently retained thereafter.

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 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 SI8 of the London Plan (2021) and the National Planning Policy Framework (2021).

7. 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 D1 and D4 of the London Plan (2021).

8. Opening of Doors

Doors to all buildings should be fixed to ensure that they do not open onto the public highway, except for doors for the purposes of fire escape and access to electricity stores.

Reason: To protect pedestrian safety in accordance with policies T1, T3 and T4 and of the London Plan 2021.

9. Passenger Lifts - Operation

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 D7 of the London Plan (2021) and the National Planning Policy Framework (2021).

10. Passenger Lifts – Noise and Vibration

Noise and vibration from the communal lift shall not exceed the criteria for dwellings specified in Table 5 BS8233:2014.

Reason: In the interests of the living conditions of the future occupiers of the site in accordance with Policy 7A of the Ealing Development Management DPD and Policy D14 of the London Plan.

11. Anti-Vibration Isolators

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: 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 7A of the Ealing Development Management DPD and Policy D14 of the London Plan.

12. 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 (2023).

13. External Lighting

External artificial lighting at the development shall not exceed the vertical illumination lux levels at neighbouring premises that are recommended for Environmental Zone 3 by the Institution of Lighting Professionals in the 'Guidance Note 01/20 For The Reduction Of Obtrusive Light'. Lighting should be minimized by limiting the hours of use. Glare and sky glow should be prevented by correctly using, locating, aiming and shielding luminaires, in accordance with the Guidance Note.

Reason: To ensure that the amenity of occupiers of surrounding premises is not adversely affected by lighting, in accordance with Policy 7A of the Ealing Development Management DPD.

14. Network Rail

Prior to any work commencing on the site, the developer shall contact the Network Rail Asset Protection Team on AngliaASPROLandClearances@networkrail.co.uk. An Asset Protection Agreement will be required with Network Rail to enable the approval of detailed works. More information can also be obtained from our website <https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/asset-protection-and-optimisation/>

Reason: To ensure that any demolition, construction or operational activities associated with the proposed development do not impede or damage the operations of Network Rail assets.

15. Sustainable Design and Construction

Prior to completion of the development the sustainability measures detailed in the approved Sustainability Statement submitted by HTA Design in March 2023 (v2), and any other relevant supporting documents, shall be implemented and maintained. The measures shall meet the requirements of local and regional planning policies and be in line with the Mayor's Sustainable Design and Construction SPG. The development shall be constructed in line with the approved energy and sustainability measures.

Reason: In the interest of addressing climate change and to secure sustainable development in accordance with policies SI2 and SI3 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 and Mayor's Sustainable Design and Construction SPG

PRIOR TO COMMENCEMENT

16. Demolition Method Statement and Construction Management 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),
- 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 ensure that the amenity of occupiers of surrounding premises is not adversely affected by noise, vibration, dust, lighting or other emissions from the site, in accordance with Policies D6, D14 and T7 of the London Plan and Policy 7A of the Ealing Development Management DPD.

17. Construction Logistics Plan

Prior to the commencement of development, a site Construction Logistics Plan shall be submitted to and approved in writing by the Local Planning Authority. The submission shall take into account other major infrastructure and development projects in the area and shall include the following:

- a) The number of on-site construction workers and details of the transport options and parking facilities for them;
- b) Details of construction hours;
- c) Anticipated route, number, frequency and size of construction vehicles entering/exiting the site per day;
- d) Delivery times and booking system (which is to be staggered to avoid morning and afternoon school-run peak periods);
- e) Route and location of site access for construction traffic and associated signage;
- f) Management of consolidated or re-timed trips;
- g) Details of site security, temporary lighting and the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
- h) Secure, off-street loading and drop-off facilities;
- i) Wheel washing provisions;
- j) Vehicle manoeuvring and turning, including swept path diagrams to demonstrate how construction vehicles will access the site and be able to turn into and emerge from the site in forward gear and including details of any temporary vehicle access points;
- k) Details as to the location(s) for storage of building materials, plant and construction debris and contractor's welfare facilities and offices;
- l) Procedures for on-site contractors to deal with complaints from members of the public;
- m) Measures to consult cyclists, disabled people and the local schools about delivery times and necessary diversions;
- n) Details of all pedestrian and cyclist diversions;
- o) A commitment to be part of Considerate Constructors Scheme; and
- p) Confirmation of use of TfL's Fleet Operator Recognition Scheme (FORS) or similar.
- q) The submission of evidence of the condition of the highway prior to-construction and a commitment to make good any damages caused during construction.
- r) Details of parking restrictions which may need to be implemented during construction work.

Reason: To ensure that the proposed development is carried out in an acceptable manner to not compromise the surrounding road and pedestrian network and to protect the amenity of surrounding residents, in accordance with Policy 7A of the Ealing Development Management DPD and Policy T7 of the London Plan.

18. 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 “Soap Works 8-10 Greenock Road, Ealing” dated March 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).

19. Piling Method Statement – Thames Water

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 sewerage 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: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB.

20. Whole Life-Cycle Carbon Assessment

- a) Prior to the Commencement of Construction, 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 HTA Design in March 2023 (v3). Modules A1-A5 should aim to achieve 788 KgCO₂e/m², and B1-C4 (excluding B6/B7) 301 KgCO₂e/m², with a total carbon emissions baseline scenario (over 60 years) of 1,026 KgCO₂e/m² (including sequestration and module D benefits).

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

21. Contaminated Land – 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 desk study phase 1 report IDOM DS 22500-22-405 march 2023) a site investigation (undertaken in accordance with BS1075:2011+A1:2013 and LCRM) 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 National Planning Policy Framework 2021; the London Plan 2021; Ealing Core Strategy 2012 and Ealing Development Management Development Plan 2013.

22. Contaminated Land – 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 National Planning Policy Framework 2021; the London Plan 2021; Ealing Core Strategy 2012 and Ealing Development Management Development Plan 2013.

23. Contaminated Land – 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 before occupation of the development. 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 National Planning Policy Framework 2021; the London Plan 2021; Ealing Core Strategy 2012 and Ealing Development Management Development Plan 2013.

24. Details of Materials

Prior to the commencement of the superstructure, details of the materials and finishes to be used for all external surfaces of the buildings hereby approved shall be submitted to and approved in writing by the local planning authority 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 D1 and D4 of the London Plan (2021) and the National Planning Policy Framework (2023).

25. Air Quality – Ventilation Strategy

Prior to the commencement of the superstructure, 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 as specified in the Ventilation: Approved Document F, Volume 1: Dwellings.

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).

26. Air Quality – Revised Air Quality Assessment

Prior to the commencement of the superstructure, a revised Air Quality Assessment shall be submitted to and approved by the Local Planning Authority. The revised assessment will detail the impact of any fixed plant proposed onsite including emergency generators, likely change in pollutant concentrations arising from the proposed development, and proposed mitigation measures. The development shall be carried out in accordance with the approved details. The emergency plant and generators may be operated only for essential testing, except when required in an emergency situation.

Reason: To ensure LA meets its obligations to deliver air quality objectives for NO₂ in accordance with London Local Air Quality Management (LLAQM), and to limit PM_{2.5} (fine particulates) to safeguard public health and well-being and external amenity of nearby sensitive receptors.

27. Sound Insulation – Building Envelope

Prior to commencement of the superstructure, details of the sound insulation required for the building envelope shall be submitted for approval by the Council in writing, having regard to the Council's assessment standard in the SPG10 and noise limits specified by BS8233:2014. Details shall include the 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). Details of best practicable mitigation measures for external amenity spaces shall also be provided and implemented, as necessary. Details shall confirm that noise limits specified in BS8233:2014 will not be exceeded. 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 7A of the Ealing Development Management DPD and Policy D14 of the London Plan.

28. Environmental Health – Plant Noise

Prior to the commencement of the superstructure, details shall be submitted to the Local Planning Authority for approval in writing, of plant/ machinery/ equipment/ducting/air in- and outlets/ mechanical installations and their external rating noise level (L_{Ar}, Tr), together with mitigation measures as appropriate. The measures shall ensure that the external rating noise level emitted 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 at surrounding premises. The assessment shall be made in accordance with BS4142:2014 +A1 2019, with all plant/equipment operating together at maximum capacity. Where required, a post installation sound assessment shall be submitted to the Local Planning Authority for approval in writing. The assessment shall be carried out to confirm compliance with the noise criteria and shall include additional steps to mitigate noise 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 7A of the Ealing Development Management DPD and Policy D14 of the London Plan.

29. Sound Insulation – Between Commercial and Residential Uses

Prior to commencement of the superstructure, 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 the commercial, industrial and communal areas, installations and facilities, from dwellings. Where noise emissions include characteristic features, the Noise Rating level should not exceed NR20 Leq 5mins (octaves) 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 is not adversely affected by noise, in accordance with Policy 7A of the Ealing Development Management DPD and Policy D14 of the London Plan.

30. Sound Insulation – Between Residential Uses

Prior to commencement of the superstructure, 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/areas, namely, bedrooms below/above/adjoining kitchen/living/dining/bathroom of separate flat. The assessment and mitigation measures shall have regard to standards of the Council's SPG10 and noise limits specified in 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 is not adversely affected by noise, in accordance with Policy 7A of the Ealing Development Management DPD and Policy D14 of the London Plan.

31. 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).

PRIOR TO OCCUPATION

32. Cycle Parking

Notwithstanding the submitted documents, details shall be submitted prior to the first occupation of the development to demonstrate how the cycle parking as shown on the approved plans will be implemented according to the specifications and adopted standards of the London Plan, the London Cycle Design Standards, and the Local Planning Authority.

The approved details shall be brought into first use prior to occupation and retained permanently.

Reason: To ensure adequate cycle parking is provided within the development in pursuance of the objectives of sustainability and encouraging the use of modes of transport other than private motor vehicles in accordance with policy T5 of the London Plan (2021), policies 1.1(k) and (g) of Ealing's adopted Development (or Core) Strategy (2012), and Ealing's Sustainable Transport for New Development SPG.

33. Deliveries and Servicing Plan

A Delivery and Servicing Plan (DSP) for 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 DSP should clearly identify how the on-street loading bay will be managed to ensure that, as far as possible, that space is continually available for deliveries. No deliveries or servicing shall occur within the proposed disabled bays or on Bollo Lane.

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 ensure that the resulting servicing arrangements are satisfactory in terms of their impact on adjoining uses and highway safety and the free flow of traffic in accordance with policies 1.1 (e) (f) (j) of the Ealing Development (Core) Strategy 2012 and policy T3 and T4 of the London Plan (2021).

34. Site-Wide Waste Management Plan

Prior to the first occupation of the hereby approved development for both the industrial and residential uses, details of the refuse and recycling storage for both uses shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the number and capacity of bins, the location of storage and the materials for the store. The approved storage shall be brought into use prior to the first use of the hereby approved development and shall be permanently retained thereafter. For the avoidance of doubt, this condition may be discharged partially for each of the separate uses.

Reason: To ensure the provision of satisfactory facilities for the storage of refuse and recycling material, in accordance with policy SI 8 of the London Plan (2021).

35. Energy and CO2

- 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 CO₂ emissions of at least 72.8% (equating to 85 tonnes of CO₂ per year) beyond Building Regulations Part L 2021 and using SAP10.2 (or later version) conversion factors. These CO₂ savings shall be achieved through the Lean, Clean, Green Energy Hierarchy as detailed in the approved Energy Statement prepared by HTA Design in March 2023 (version 2) including:
- i. Lean, energy efficiency design measures to achieve an annual reduction of at least 15.8% equating to at least 17.5 tonnes in regulated carbon dioxide (CO₂) emissions over BR Part L 2021 for the residential development, and at least 14.9%, equating to at least 1 tonnes, over Part L 2021 for the non-residential space.
 - ii. Green, renewable energy equipment including the incorporation of photovoltaic panels with a combined total capacity of at least 20 kWp, and Air Source Heat Pumps to achieve an annual reduction of at least 57%, equating to 67 tonnes, in regulated carbon dioxide (CO₂) emissions over Part L 2021.
 - iii. Seen, heat and electric meters installed to monitor the performance of the PV and the carbon efficiency (SCOP) of the centralised 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 loop 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 kWp capacity of the PV 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 prepared by HTA Design in March 2023 (version 2). Any later stage version shall be compliant with CIBSE guidance Part O (TM59/Guide A), and/or TM52, 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) and/or the Display Energy Certificate(s) (DEC's) 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.

36. **Post-construction renewable/low-carbon 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 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 CO₂ Condition(s).
- b) Upon final construction 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 four 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 (Emergence 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 energy equipment for a period of four 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.

37. Circular Economy

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.

Specific commitments detailed in the Circular Economy statement produced by HTA Design in March 2023 (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).

38. Travel Plan

A Travel Plan shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the use for the residential and industrial uses of the development. The detailed Travel Plan shall be prepared in accordance with Ealing's Sustainable Transport for New Development SPD in use at the time of its preparation. The development shall be carried out in accordance with the approved Travel Plan. For the avoidance of doubt, the condition may be partially discharged for the industrial and residential uses.

Reason: To promote sustainable modes of transport, and to ensure that the development does not exacerbate congestion on the local road network, in accordance with policies 1.1 (f) (g) of the Ealing Development Strategy 2026 (2012); policies T1, T3, T4, T5 and T6 of the London Plan (2021) and Ealing's Sustainable Transport for New Development SPG.

39. Air Quality – 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 LA 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.

40. Details of Children’s Play Areas, Landscaping, Boundary Treatments, Green Roof and Surface Drainage

Prior to first occupation or use of the proposed development hereby approved, the following details shall be submitted to and approved in writing by the local planning authority. The development shall be implemented only as approved and retained thereafter.

- Details of children’s play area including safety surfacing and equipment.
- Details of hard and soft landscaping scheme, including landscape design.
- Details of boundary treatments.
- Details of street trees proposed
- Details of a Landscape Management Plan for a minimum period of 5 years from the implementation of final planting (specify only for applications with significant public aspect, important habitat qualities & opportunities or communal spaces in larger residential developments).
- Details of the green roof construction and specification, together with a maintenance schedule.
- Details of sustainable urban drainage systems to be implemented on site.

Reason: To ensure that there is suitable provision for landscaping, play facilities and drainage within the site in accordance with policies 1.1 (e), 2.1 (c) of the Ealing Core Strategy (2012), policies LV 3.5 and 7D of the Ealing Development Management Development Plan Document (2013), policies D6, S4 and G5 of the the London Plan (2021), SPG on Chidren’s Play and Recreation, and the National Planning Policy Framework (2021).

41. Thames Water – Development Infrastructure Phasing Plan

No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning.

ONGOING CONDITIONS

42. 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.

Informatives:

1. 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
- E4 Land for industry, logistics and services to support London's economic function
- E5 Strategic Industrial Locations (SIL)
- E6 Locally Significant Industrial Sites
- 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 $L_{Aeq,1hr}$ 67dB by 2016. In calculating the insulation required the $L_{Leq,1hr}$ aircraft noise spectrum, shown at SPG10, shall be used, along with the spectrum for any other dominant noise sources. Under SPG10, the predicted $L_{Leq,1hr}$ 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 - $L_{Leq,1hr}$	
	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 wwriskmanagement@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.

- Decommissioning 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.

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](#)

18. Although it is not anticipated that the use of a crane at this site will impact Heathrow's Obstacle Limitation Surfaces, Instrument Flight Procedures or radar. We would like to advise the developer that if a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane, as per the requirements set out by CAP1096 .

19. The following items are brought to the applicants attention in relation to activities on the site and their impact on the operations, assets and functions of Network Rail:

- Existing railway infrastructures including embankment should not be loaded with additional surcharge from the proposed development unless the agreement is reached with Network Rail. Increased surcharge on railway embankment imports a risk of instability of the ground which can cause the settlement on Network Rail infrastructure (Overhead Line Equipment / gantries, track, embankment etc.).
- The developer is responsible for a detailed services survey to locate the position, type of services, including buried services, in the vicinity of railway and development site. Any utility services identified shall be brought to the attention of Senior Asset Protection Engineer (SAPE) in Network Rail if they belong to railway assets. The SAPE will ascertain and specify what measures, including possible re-location and cost, along with any other asset protection measures shall be implemented by the developer.
- The developer must ensure any future maintenance does not import the risks to the operational railway. The applicant must ensure that the construction and subsequent maintenance of their development can be carried out without adversely affecting the safety of operational railway.
- Operation of mobile cranes should comply with CPA Good Practice Guide 'Requirements for Mobile Cranes Alongside Railways Controlled by Network Rail'. Operation of Tower Crane should also comply with CPA Good Practice Guide 'Requirements for Tower Cranes Alongside Railways Controlled by Network Rail'. Operation of Piling Rig should comply with Network Rail standard 'NR-L3-INI-CP0063 - Piling adjacent to the running line'. Collapse radius of the cranes should not fall within 4m from the railway boundary unless possession and isolation on NR lines have been arranged or agreed with Network Rail.
- Any temporary structures which are to be constructed adjacent to the railway boundary fence (if required) must be erected in such a manner that at no time will any item fall within 3 metres

from the live OHLE and running rail or other live assets. Suitable protection on temporary works (for example: Protective netting around scaffold) must be installed.

- The developer must ensure that any piling work near or adjacent to the railway does not cause an operational hazard to Network Rail's infrastructure. Impact/Driven piling scheme for a development near or adjacent to Network Rail's operational infrastructure needs to be avoided, due to the risk of a major track fault occurring. No vibro-compaction/displacement piling plant shall be used in development.
- Where required, the developer should provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. Network Rail's existing fencing / wall must not be removed until it is agreed with Network Rail.
- Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers' vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of their detailed proposals regarding lighting.
- The applicant shall provide all construction methodologies relating to works that may import risks onto the operational railway and potential disruption to railway services, the assets and the infrastructure for acceptance prior to commencing the works. All works must also be risk assessed to avoid disruptions to the operational railway.
- The developer must ensure that the locations and extent of invasive plant (if any, for example: Japanese Knotweed) are identified and treated in accordance with the current code of practice and regulations if exists on site. Any asbestos identified on site should be dealt in accordance with current standard, Health and Safety Guideline and regulations by the developer.
- Glint and Sunlight glare assessment should be carried out (if there is a risk) to demonstrate the proposed development does not import risk of glare to the train drivers which can obstruct in the visibility of the signals.
- The developer will be required to undertake a full Electro Magnetic Interference (EMC) risk assessment on the impact the project will have upon NR.
- Contractors are expected to use the 'best practical means' for controlling pollution and environmental nuisance complying all current standards and regulations. The design and construction methodologies should consider mitigation measures to minimise the generation of airborne dust, noise and vibration in regard to the operational railway.
- Contractors are expected to use Network Rail recommended tree species only if required alongside the railway boundary. List of recommended tree species can be made available when requested.
- If there are any access points / gates to the railway, it's contractor's responsibility to maintain 24/7 unobstructed access to the railway for maintenance purposes.
- Drainage from the shall be taken away from the railway infrastructure. There shall not be any attenuation tank or soakaways within 10-20m from the railway boundary.