

Ref	220545FULR3
Address	Site of Former Northolt Grange Community Centre And Part Of St Raphael's Catholic School, Northolt, UB5 6NF
Ward	Northolt West End
Proposal	Development of 92 residential dwellings (Use Class C3) with associated vehicular and pedestrian access across three buildings ranging from two to five storeys in height, along with the provision of children play space, residential amenity space, public open space, vehicle and cycle parking and other associated works including public realm and landscaping works. (Following demolition of the existing community centre, school building, playground, MUGA and associated structures) [Regulation 3 Application by London Borough of Ealing]
Drawing Nos.	NHG-HOK-1X-ZZ-DR-A-0001/ Rev P04 - SITE LOCATION PLAN; NHG-HOK-1X-ZZ-DR-A-0002/ Rev P04 - PLANNING APPLICATION SITE PLAN; NHG-HOK-1X-ZZ-DR-A-0003/ Rev P04 - EXISTING SITE PLAN; NHG-HOK-1X-ZZ-DR-A-0004/ Rev P04 – EXISTING ELEVATIONS; NHG-HOK-1X-ZZ-DR-A-0005/ Rev P05 - PROPOSED LAND SWAP PLAN; NHG-HOK-1X-ZZ-DR-A-0110/ Rev P04 - BLOCK PLAN; NHG-HOK-1X-ZZ-DR-A-0111/ Rev P04 - DEMOLITION PLAN; NHG-HOK-ZZ-ZZ-DR-A-0040/ Rev P04 - WIDER MASTERPLAN - USES AT GROUND FLOOR; NHG-HOK-ZZ-ZZ-DR-A-0041/ Rev P04 - WIDER MASTERPLAN – HEIGHTS; NHG-HOK-ZZ-ZZ-DR-A-0042/ Rev P04 (WIDER MASTERPLAN - FIGURE GROUND); NHG-HOK-ZZ-ZZ-DR-A-0043/ Rev P04 (WIDER MASTERPLAN – SOCIAL INFRASTRUCTURE); NHG-HOK-1X-RF-DR-A-0115/ Rev P02 - PROPOSED SITE PLAN; NHG-HOK-1X-GF-DR-A-1001/ Rev P05 - GA PLAN - GROUND FLOOR; NHG-HOK-1X-01-DR-A-1002/ Rev P05 - GA PLAN - LEVEL 1; NHG-HOK-1X-02-DR-A-1003/ Rev P05 - GA PLAN - LEVEL 2; NHG-HOK-1X-03-DR-A-1004/ Rev P05 - GA PLAN - LEVEL 3; NHG-HOK-1X-04-DR-A-1005/ Rev P05 - GA PLAN - LEVEL 4; NHG-HOK-1X-RF-DR-A-1006/ Rev P05 - GA PLAN - ROOF PLAN; NHG-HOK-1X-ZZ-DR-A-3001/ Rev P05 NORTH & SOUTH; NHG-HOK-1X-ZZ-DR-A-3002/ Rev P05 - EAST ELEVATION; NHG-HOK-1X-ZZ-DR-A-3003/ Rev P05 - WEST ELEVATION; NHG-HOK-1X-ZZ-DR-A-3004/ Rev P03 - SOUTH BUILDING NORTH ELEVATION; NHG-HOK-1X-ZZ-DR-A-3018/ Rev P05 - SECTION A-A; NHG-HOK-1X-ZZ-DR-A-3019/ Rev P03 - SECTION B-B; NHG-HOK-1X-ZZ-DR-A-3020/ Rev P02 - SECTION C-C; NHG-HOK-1X-ZZ-DR-A-4001/ Rev P05 -

UNIT PLAN - 1N-1S - 1B2P - TYPE A; NHG-HOK-1X-ZZ-DR-A-4002/ Rev P04 - UNIT PLAN - 1N-1S - 1B2P - TYPE B; NHG-HOK-1S-ZZ-DR-A-4003/ Rev P03 - UNIT PLAN - 1S - 2B3P - TYPE A; NHG-HOK-1N-ZZ-DR-A-4004/ Rev P04 - UNIT PLAN - 1N - 2B4P - TYPE A; NHG-HOK-1S-ZZ-DR-A-4005/ Rev P03 - UNIT PLAN - 1S - 2B4P - TYPE C; NHG-HOK-1S-ZZ-DR-A-4006/ Rev P03 - UNIT PLAN - 1S - 2B4P - WCA TYPE A; NHG-HOK-1S-GF-DR-A-4007/ Rev P03 - UNIT PLAN - 1S - 3B5P - TYPE A - GF; NHG-HOK-1S-01-DR-A-4008/ Rev P03 - UNIT PLAN - 1S - 3B5P - TYPE A - L1; NHG-HOK-1M-GF-DR-A-4009/ Rev P04 - UNIT PLAN - 1M - 4B6P - TYPE A - GF; NHG-HOK-1M-01-DR-A-4010/ Rev P04 - UNIT PLAN - 1M - 4B6P - TYPE A - L1; NHG-HOK-1M-02-DR-A-4011/ Rev P04 - UNIT PLAN - 1M - 4B6P - TYPE A - L2; NHG-HOK-1S-ZZ-DR-A-5001/ Rev P05 - BAY STUDY 01 - SOUTH BUILDING ENTRANCE; NHG-HOK-1M-ZZ-DR-A-5002/ Rev P05 - BAY STUDY 02 - TYPICAL MEWS FAMILY HOUSE; NHG-HOK-1N-ZZ-DR-A-5003/ Rev P05 - BAY STUDY 03 - NORTH BUILDING ENTRANCE; NHG-HOK-1X-ZZ-DR-A-5004/ Rev P05 - BAY STUDY 04 - PARKING-CYCLE STORE ENTRANCE; NHG-HOK-1X-ZZ-DR-A-6000/ Rev P05 - FULL AXONOMETRIC; NHG-HOK-1M-ZZ-DR-A-6001/ Rev P05 - MEWS FAMILY HOUSING; AXONOMETRIC; NHG-HOK-1N-ZZ-DR-A-6002/ Rev P05 - NORTH BUILDING; AXONOMETRIC; NHG-HOK-1S-ZZ-DR-A-6003/ Rev P05 - SOUTH BUILDING; AXONOMETRIC; NHG-HOK-1X-01-DR-L-1002/ Rev P05 - LANDSCAPE - GA SITE PLAN - LEVEL 1; NHG-HOK-1X-ZZ-DR-L-7001/ Rev P04 - LANDSCAPE - SITE SECTIONS; NHG-HOK-1X-XX-DR-L-9001/ Rev P03 - LANDSCAPE - SOFT LANDSCAPE DETAILS; NHG-HOK-1X-GF-DR-L-4001/ Rev P03 - LANDSCAPE - TREE RETENTION-REMOVAL PLAN; NHG-HOK-1X-GF-DR-L-4002/ Rev P03 - LANDSCAPE - TREE PLANTING PLAN; NHG-HOK-1X-XX-SH-A-0100 - UNIT SUMMARY & AREA SCHEDULE; NHG-HOK-1X-XX-SH-A-0101 - ACCOMMODATION SCHEDULE; NHG-HOK-1X-XX-SH-A-0102 - CYCLE SCHEDULE; NHG-HOK-1X-XX-SH-A-0103 - WASTE SCHEDULE; NHG-HOK-1X-GF-DR-A-0113/ Rev P04 - ACCESS STRATEGY; NHG-HOK-1X-GF-DR-A-0114/ Rev P04 - REFUSE STRATEGY

Supporting Documents

COVERING LETTER; PLANNING STATEMENT (LICHFIELDS); DESIGN AND ACCESS STATEMENT; STATEMENT OF COMMUNITY INVOLVEMENT (LICHFIELDS); TRAVEL PLAN (MARKIDES); TRANSPORT ASSESSMENT (MARKIDES); NORTHOLT GRANGE - SELF-TEST DAYLIGHT REPORT - (CPMC); NORTHOLT GRANGE - DAYLIGHT AND SUNLIGHT REPORT (CPMC); OBTRUSIVE LIGHT STATEMENT (HOARE LEA); NOISE ASSESSMENT

(HOARE LEA); AIR QUALITY ASSESSMENT (HOARE LEA); LAND CONTAMINATION GROUND INVESTIGATION REPORT (JOMAS); LAND CONTAMINATION DESK STUDY RISK ASSESSMENT APPENDICES PART 2 (JOMAS); LAND CONTAMINATION DESK STUDY RISK ASSESSMENT APPENDICES PART 1 (JOMAS); CONTAMINATION DESK STUDY RISK ASSESSMENT (JOMAS); ENERGY STRATEGY (HOARE LEA); SUSTAINABILITY STRATEGY (HOARE LEA); WHOLE LIFE CARBON ASSESSMENT (HOARE LEA); CIRCULAR ECONOMY STATEMENT (HOARE LEA); ECOLOGY ASSESSMENT (TEP); NORTHOLT GRANGE ARBORICULTURAL IMPACT ASSESSMENT; TREE SURVEY DATA (TEP); HISTORIC ENVIRONMENT DESK-BASED ASSESSMENT (TEP); FRA & SUDS - PART 1 OF 3 (GS); FRA & SUDS - PART 2 OF 3 (GS); FRA & SUDS - PART 3 OF 3 (GS); FIRE STATEMENT FOR PLANNING (HOARE LEA); UTILITY AND INFRASTRUCTURE STATEMENT (HOARE LEA); SITE WASTE MANAGEMENT PLAN (SILVER); S106 DRAFT HEADS (LICHFIELDS); Air Quality Technical Note (Hoare Lea); Technical Note – Parking Ratio Assessment; 20135-MA-XX-XX-DR-C-0007/ Rev P01 – 2019 Ford Transit Van Swept Path Analysis; 20135-MA-XX-XX-DR-C-0001/ Rev P07 – 8m Ealing Refuse Vehicle Swept Path Analysis

Type of Application Full Planning Application - (Regulation 3 Application)

Application Received 09-02-2022

Report by Wade Banks

Recommendation: Grant planning permission subject to completion of a Section 106 agreement and conditions of consent.

EXECUTIVE SUMMARY

The application site is located at the former Northolt Grange Community Centre and the eastern part of the St Raphael's Catholic School, in Northolt. The site comprises the former Northolt Grange Community Centre, school buildings, a playground and a Multi-Use Games Area (MUGA) to the north and is approximately 6,145 sqm in scale.

The site is generally surrounded to the east and south by residential semi-detached type houses, with pitched roofs. To the west is the remainder of the school buildings, which also range between 1 and 2 stores in height. To the north is open space in the form of Green Belt and SINC land.

In terms of accessibility, the site has a PTAL of 1, which is considered to have a relatively low level of public transport accessibility. However, there are bus routes within 500m of the site.

The Northolt Grange Community Centre has been vacant since 2017 and all user groups of the facility were relocated at the time. St Raphael's Catholic Primary School is reducing from a 3 to 2 form entry school, based on the determined local need decreasing. Planning permission for the demolition of the community centre, surplus school buildings and re-provision of school facilities on the consolidated school site was granted in December 2021 (ref: 213792HYBRID). Relocating the existing school facilities onto a rationalised and reorganised school site enables the eastern plot to become available as a residential developable site, with potential to optimise an existing brownfield site.

The current application can be accurately described as the proposed: "Development of 92 residential dwellings (Use Class C3) with associated vehicular and pedestrian access across three buildings ranging from two to five storeys in height, along with the provision of children play space, residential amenity space, public open space, vehicle and cycle parking and other associated works including public realm and landscaping works. (Following demolition of the existing community centre, school building, playground, MUGA and associated structures) [Regulation 3 Application by London Borough of Ealing]"

The proposed 92 homes would be provided in the form of flats accommodated across two mansion blocks; one along the east side of the site fronting Rushdene Crescent (northern block) and one to the south of the site fronting Hartfield Avenue; and 8 Mews Houses located along the western side of the site. The proposed mansion blocks would extend to 5 stories in height and would be constructed in warm buff brick with green metal entrances and balconies, while the proposed Mews houses would extend to 3 stories in height and would be constructed in a light grey brick.

These three 'blocks' would all be linked by internally located car parking area and a podium deck above. These homes would be accessed from a northern entrance along Rushdene Crescent, a southern entrance at the corner of Rushdene Crescent and Hartfield Avenue, and the Mews houses would be accessed from a landscaped footpath running along the western border of the site, which itself will be accessed from both the north and south. The site would also be subject to a comprehensive landscaping plan, including the provision of a health street and active park to the north of the site.

The proposed development would optimise the regeneration potential of the existing site and would deliver a total of 92 homes, of which 100% of the units will be affordable housing. This affordable housing provision would be in the form of 84 London Affordable Rent units and 8 Shared Ownership Mews houses. This is a tenure split of 91.3% London Affordable Rent (low cost rented homes) and 8.7% Shared Ownership. The proposal would therefore far exceed the requirements set out in policy H4 and H6 of the London Plan (2021) and would make a significant contribution towards the provision of new affordable homes in the Borough. Significant weight has been attached to this public benefit of the scheme.

While no direct re-provision of a community centre on site is proposed, this is not considered to be a direct conflict with London Plan policy. In any case, the site would deliver greater

public benefits than the retention of the existing community centre would, should planning be refused, in the form of not only the delivery of much needed genuinely affordable housing in the borough, but also through the delivery of the proposed healthy street and active park.

The applicant has submitted a detailed Design and Access statement (DAS) in support of the proposal. This document demonstrates and outlines how the proposed building form and massing has developed through an iterative design process, including testing the design for its impact to the surrounding area, the wider viewing corridors, as well as environmental considerations such as daylight / sunlight and sustainability considerations such as solar gain. An important part of the design process has been to carefully balance the building footprint size to its height, while providing efficient and quality buildings.

While it is recognised that the height and contemporary design of the proposed blocks would not directly mirror the surrounding terraced houses, the overall design is considered to be exemplary and would not result in harm to the visual amenity of the area. It is also noted that approximately 250m from the site is Grange Court, which contains two blocks of flats at 3 and 5 stories in height. Therefore, the proposal would not be material taller than existing buildings within the medium-term context.

The layout of the buildings has been arranged to create a publicly accessible perimeter open space strategy which incorporates a healthy streets approach to both Rushdene Crescent and Hartfield Avenue. The proposed development would improve the streetscape significantly, through the incorporation of the proposed health street, active park and comprehensive landscaping and exemplary design. The visual impact of the proposed development has also been carefully considered, as set out in the Design and Access Statement, and is considered to offer an outstanding quality of design which makes a positive and appropriate contribution to the site's local context in accordance with local planning policy.

The proposal has been assessed in terms of its potential impacts on neighbouring amenity, including from potential loss of privacy, loss of outlook, and impact on daylight and sunlight. Given the setback of the buildings from the nearest neighbouring properties, as well as the orientation of the windows, it is considered unlikely that the proposal would result in harm to local amenity in terms of a loss of privacy or outlook. It is recognised that some windows would face towards the retained school site. However, the degree to which this would be harmful is not considered significant, or to warrant a refusal in this regard.

A daylight and sunlight assessment has been submitted in support of this application. This report demonstrates that all neighbouring external amenity spaces that we have examined comply with the guidance contained in the BRE Guide. The results also show full compliance with the window sunlight test. There are localised daylight transgressions, but these are localised and it is considered that the retained Vertical Sky Component and Daylight Distribution results are acceptable for this location and in this instance given their limited impact overall on the amenity of occupiers of these properties

At the time of writing, 236 representations have been received in response to the public consultation, in objection to the development. The key planning issues raised include concerns regarding the scale, massing, height and design of the proposed development; its impact on the local transport network and street parking; its impact on local amenity, both during construction and operation; its impact on local facilities and amenities; and its impact on the school and pupils. However, after thorough consideration it has been concluded that the matters raised do not outweigh the recommendation for approval in this case, on balance.

All other matters including impact on local ecology, environmental health, transport matters and servicing, energy and sustainability have all been assessed and found acceptable.

The proposal is consistent with the aims of the relevant adopted policies and documents of the Local Plan, relevant Supplementary Planning Guidance, the National Planning Policy Framework and emerging planning policy documents. It is therefore recommended that planning permission be granted with conditions, subject to planning obligations.

RECOMMENDATION

That the committee **GRANT** planning permission subject to conditions of consent contained in Appendix A and subject to the satisfactory completion of a legal agreement under section 106 of the Town and Country Planning Act 1990 (as amended) to secure the items set out below.

Heads of Terms

The proposed obligations and financial contributions to be secured by the s106 agreement are set out as follows.

Contribution Heading		Proposed Contributions
Highways Contributions		<i>Total: £98,000</i>
<p>Parking Stress This development could cause overnight parking stress around road network near the development. Therefore, the Council will review and implement a controlled parking zone near the development.</p> <p>Total cost of the mitigation measures is £45,000. The applicant is asked to contribute £20,000 towards the cost of these measures.</p>	<p>To mitigate the impact of parking congestion on nearby roads and review the existing restrictions around the development.</p>	<p>£20,000</p>

<p>Cycle Infrastructure To improve the cycle infrastructure near development. The cost of these measures is £50,000. The applicant will pay only £25,000.</p>	<p>To promote the modal shift cycling and reduce the accident risk to cyclists.</p>	<p>£25,000</p>
<p>Traffic calming and pedestrian crossing facilities To strengthen traffic calming measures on the residential roads south of the development and provide a pedestrian crossing on near the residential roads. The cost of the scheme will be in the region of £100,000. The measures include entry treatments at the junctions and additional speed tables on the adjacent junctions. The applicant should contribute £30,000 towards the cost of these measures.</p>	<p>To improve safety for pedestrians and cyclists. There were many pedestrian accidents on the residential streets to the south of the development of which form part of the route that residents from this development are likely to use to a local school and other common amenities.</p>	<p>£30,000</p>
<p>Bus stops improvements To improve the adjacent bus stops near the application site, the total cost will be £50,000. The applicant is to contribute £20,000 towards improvements of these bus stops. Measures should include installation of countdown at bus stops in the vicinity of the site.</p>	<p>The development will generate over substantial non-vehicular trips daily. More than 30 % of these trips will be bus trips. This will increase demand at existing bus stops in the vicinity of the site which are already congested during the evening peak and Saturday peak periods.</p>	<p>£20,000</p>
<p>Travel plan monitoring</p>		<p>£3,000</p>
<p>Landscape and Leisure Contributions</p>		<p><i>Total £28,405</i></p>
<p>Children's Play and Teen Play</p>	<p>For a development of this size a total of 849.8m² of dedicated play space would be required. In total, the proposed development will provide 740sqm so will be short by 109.8m² and so a section 106 contribution will be required.</p>	<p>£13,477</p>

Allotment Space	Ealing policy in the DPD document page 22 states that 1.7m2 of allotment space is required per person. This means a total of 426.53m2 is required within this development. As none has been provided a section 106 contribution will be required.	£14,929
Tree Contribution	TBC – Will be confirmed prior to Committee and detailed in the briefing notes.	TBC
Leisure’s strategic sporting infrastructure	The development would generate 92 additional homes in this part of the borough. The occupiers of these homes will generate additional demand for existing and future sports facilities. An approximate indication of the potential demand and subsequent financial contribution required to mitigate this impact has been generated using Sport England’s Sports Facility Calculator model.	<i>Total</i> £118,000
Energy and Sustainability		<i>Total</i> £9,464
Post construction automated energy monitoring web-platform and associated officer/consultant time		£4,788
Cost of the energy monitoring equipment and data processing (4 years).		£4,676
NHS		<i>Total</i> £144,483
Air Quality Monitoring		<i>Total</i> £9,200
Total		£407,552

Table 1: Heads of terms

**Policy S12 of the London Plan requires new major development to meet zero-carbon standards with at least a 35% CO2 reduction beyond Building Regulations Part L 2013 (or any later version) being achieved onsite. Any shortfall will be met through a S106 carbon offset contribution, not included in the above calculations.*

- The Developer Covenants that where prior to Occupation of Development the assessment carried out as required by the Energy Assessment Condition shows that the Carbon Dioxide Emission Target cannot be met on site there shall be no Occupation of Development unless and until such time as the Carbon Dioxide Off Setting Sum of £134,235 has been paid to the Council.

- The Developer also Covenants to pay an additional ‘Additional Carbon Offset Contribution’ to mitigate any shortfall in the carbon reduction achieved by the proposed “Clean/Green” heat pump and PV equipment.
- 84 residential units are to be provided as affordable housing in the form of London Affordable Rent units and 8 units shall be Shared Ownership units (8%).
- Restriction of Parking Permits – all of the proposed units shall be precluded from obtaining a parking permit and visitor parking vouchers to park within any future surrounding CPZs.
- Provision for re-allocation of contributions within the overall amount agreed to allow flexibility regarding final costs, to ensure that impacts of the development are properly met.
- All contributions to be index linked.
- Payment of the Council’s reasonable Legal and other professional costs in preparing and completing the agreement.

SITE DESCRIPTION

The application site is located at the former Northolt Grange Community Centre and the eastern part of the St Raphael's Catholic School, in Northolt. The site comprises the former Northolt Grange Community Centre, school buildings, a playground and a Multi-Use Games Area (MUGA) to the north and is approximately 6,145 sqm in scale.

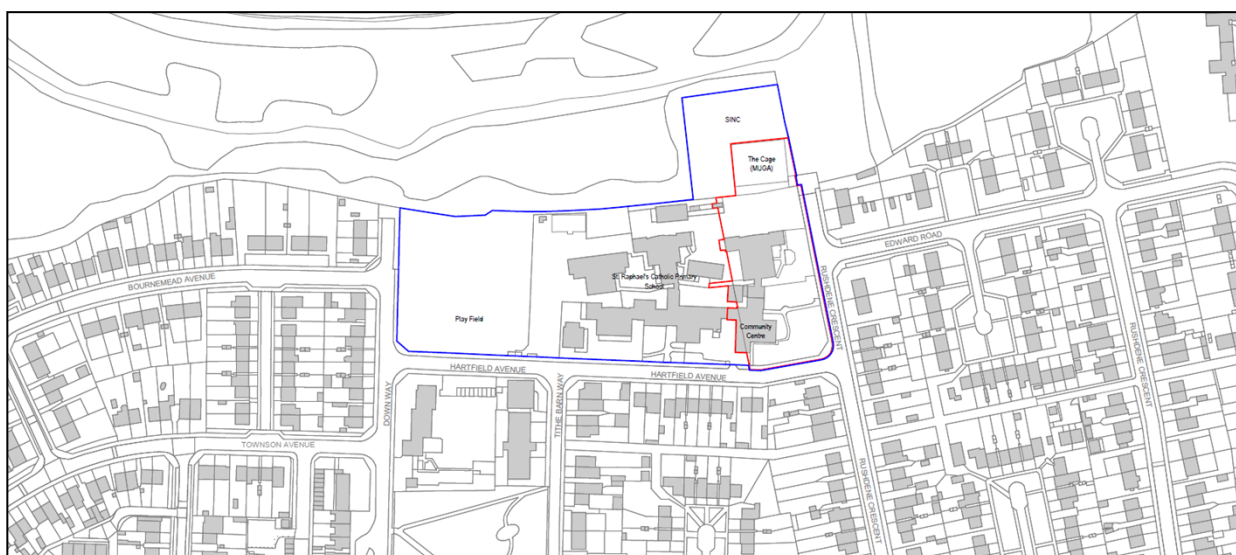


Figure 1: Site Location

Part of the Site is operated by St Raphael’s Roman Catholic Primary School. St Raphael's Catholic Primary School is a Roman Catholic primary school in the Ealing Local Education Authority. The school is a large mixed gender primary school with 619 pupils aged 3-11 years of age. The school buildings are generally single storey with staff and nursery facilities located to the south, teaching accommodation for younger children to the east and older children learning to the west. The western side of the school Site is used as grass play.

The Northolt Grange Community Centre is an unoccupied building within the Site, having been closed since 2017. The single storey brick building operated prior to 2017 with two Site entrances, a vehicular entrance on of Hartfield Avenue to the south accommodating 6 parking spaces, and a pedestrian entrance to the east on Rushdene Crescent. The centre has since been replaced with a facility elsewhere in the borough.



Figure 2: Northolt Grange Community Centre

The Cage (Multi Use Games Area) is the name of a multi-use games area situated in the north eastern corner of the site. The space suffers from a lack of visual connectivity to the community, boarded by mature planting on all sides. The lack of passive supervision and its location at the end the termination of Rushdene Crescent has resulted in the MUGA being under used and prone to anti-social behaviour. Its inactivity has further resulted in its run-down appearance, which has meant the space is unsafe to use for its intended purpose. The Cage sits within Green Belt land. Bordering the Cage on 3 sides, the site sits on an area of the Green Belt which is designated as being a Site of Important Nature Conservation.



Figure 3: The Cage MUGA

The site is bounded by Rushdene Crescent to the east, Hartfield Avenue to the south, St

Raphael's School to the east and the Down Barns/ West London Shooting Grounds to the north. There are pedestrian access points to the community centre and to the school from Rusdene Crescent, there is also a vehicular access to the school. There is vehicle access to the community centre from Hartfield Avenue.

The site is generally surrounded to the east and south by residential semi-detached type houses, with pitched roofs. To the west is the remainder of the school buildings, which also range between 1 and 2 storeys in height. To the north is open space in the form of Green Belt. Other notable buildings nearby to the site are:

- Northolt Baptist Church sits approximately 175m away, and access from Hartfield Avenue.
- To the east of the site approximately 350m away sits the 6-storey residential development of Grange Court.
- The site sits generally within a low scale neighbourhood of semi-detached houses.
- Secondary shop frontages can be found 350m SW of the site on Down Way.

The site has a PTAL of 1, which is considered to have a relatively low level of public transport accessibility level. In terms of accessibility by public transport there are a number of bus stops within 500 metres of the site, with the nearest bus stops located on Kingshill Avenue and Yeading Lane, providing services to Northolt Station, Ruislip and Feltham. Northolt Station is located approximately 2.7km northeast from the site and provides direct access central London via the Central Line.

The site is not located within a conservation area. The White Hart Public House is located 800m from the site on the White Hart Public House and is Grade II* listed. There is also a Medieval moated site at Down Barns Farm located 500m north of the site, adjacent to the West London shooting school, which has been listed as a Scheduled Monument. Down Barns (including the MUGA) is an Archaeological Interest Site. The Down Barns/ North London Shooting Grounds to the north of the site is designated as Green Belt. The area to the north is also a Site of Important Nature Conservation (SINC). The MUGA is covered by the Green Belt designation but is outside of the SINC.

The site is located in Flood Zone 1, the lowest probability of river or sea flooding.

BACKGROUND TO THE PROPOSAL

The Northolt Grange Community Centre has been vacant since 2017 and all user groups of the facility were relocated at the time. The site has been identified by Ealing Council as have the potential to provide new housing since 2018.

St Raphael's Catholic Primary School is reducing from a 3 to 2 form entry school, based on the determined local need decreasing. This will result in several of the school's facilities and buildings becoming surplus to their requirements and redundant over time as the school transitions to a smaller intake of pupils. The MUGA to the north of the site is currently underused and has been linked to anti-social and unsafe behaviour.

Planning permission for the demolition of the community centre, surplus school buildings and

re-provision of school facilities on the consolidated school site was granted in December 2021 (ref: 213792HYBRID). Relocating the existing school facilities onto a rationalised and reorganised school site enables the eastern plot to become available as a residential developable site, with potential to optimise an existing brownfield site.

The proposals for the school have been subject to a series of meetings with the Head Teacher and Head of Governors to ensure it meets the needs of the school.

RELEVANT PLANNING HISTORY

The only planning history of relevance to redevelopment of the site is the recently approved application ref. 213792HYBRID. This application was approved in December 2021 for the following development:

“Hybrid planning application for the redevelopment of the site, comprising: Full planning permission for the demolition of the existing community centre, school building, MUGA and other associated structures; and development of new hardstanding play area and path. Outline planning permission to provide school facilities, including temporary classrooms (Use Class F1), and a parking area for the school staff.”

This planning permission provides approval for the demolition of the community centre, surplus school buildings and re-provision of school facilities on the consolidated school site. It also facilitates the separation of the school from the eastern plot, which is to be the subject of this planning application.

The school-works were progressed separately to enable them to be carried out during school summer holidays and ensure minimal disruption to school users. They are expected to commence in Summer 2022.

THE PROPOSAL

The current application can be accurately described as the proposed:

“Development of 92 residential dwellings (Use Class C3) with associated vehicular and pedestrian access across three buildings ranging from two to five storeys in height, along with the provision of children play space, residential amenity space, public open space, vehicle and cycle parking and other associated works including public realm and landscaping works. (Following demolition of the existing community centre, school building, playground, MUGA and associated structures) [Regulation 3 Application by London Borough of Ealing]”

The proposed 92 homes would be provided in the form of flats accommodated across two mansion blocks; one along the east side of the site fronting Rushdene Crescent (northern block) and one to the south of the site fronting Hartfield Avenue; and 8 Mews Houses located along the western side of the site. These three ‘blocks’ would all be linked by internally located car parking area and a podium deck above.



Figure 4: Proposed site overview

The proposed homes would be accessed from a northern entrance along Rusdene Crescent, a southern entrance at the corner of Rusdene Crescent and Hartfield Avenue, and the Mews houses would be accessed from a landscaped footpath running along the western border of the site, which itself will be accessed from both the north and south. The proposed dwelling mix of the total units is as follows:

Dwelling Size	Number of Units
1 Bedroom	43
2 Bedroom	30
3 Bedroom	11
4 Bedroom	8
Total	92

Table 2: Proposed Unit Mix Overview

The two mansion blocks would extend to 5 storey’s in height, with the Mews houses being 3 storey’s in height. The proposed facades of the northern and southern blocks would be composed of warm buff brickwork and the Family Mews Housing facades will be light grey brickwork. Green metal balconies and entrances are proposed to contrast with the warm buff brick of the north and south blocks.

The scheme would provide 100% affordable housing. All of the proposed flats would be provided as London Affordable Rent, while the proposed Mews houses would be provided as shared ownership.

Also proposed are extension landscaping works, including the incorporation of a ‘health street’ that would wrap around the site, an active park to the north of the site in place of the existing MUGA, and children play space at the podium deck level.



Figure 5: Proposal Axonometric View

In summary the works comprise:

1. 92 residential dwellings arranged across within three buildings: the northern block, the southern block and the mews family houses;
2. The buildings range in height from northern and southern blocks will have a maximum height of five storeys and the mews family houses will have a height of up to three storeys;
3. 3,350 sqm of publicly accessible open space, comprising:
 - a) 1,070 sqm Healthy Streets area
 - b) 820 sqm new public park
 - c) 340 sqm of Play Street areas
 - d) 600 sqm children's play area in landscaped play deck at Level 1
 - e) 520 sqm the Mews (of which 140 sqm of dedicated children's play space)
4. Parking will be provided on site, enclosed by a podium play deck above, to provide 27 parking spaces of which 9 are disabled spaces; and
5. Secure cycle parking will be provided for 165 bikes.

CONSULTATION

It should be noted that in addition to statutory required consultation, the applicant undertook comprehensive community consultation prior to the submission of the application. The methods and results of this community consultation are outlined within the submitted Statement of Community Engagement. In summary, the community consultation programme took place in an 8-week period between November 2020 and January 2021. A range of methods of sharing the proposals with the community were adopted to ensure it attracted a range of stakeholders and members of the local community.

The consultation took place in two stages to allow initial ideas to be shared with feedback sought and taken on board earlier in the scheme design process. This was followed by a second stage with updated emerging proposals shared and further feedback sought. The community consultation included a series of live online public consultation events where members of the public could ask questions. The online consultation events were held across

four days (two for each stage). The four days and varying times were chosen intentionally to ensure that as many interested parties as possible would be able to attend at a time convenient to them.

In addition to the online consultation events, the consultation encouraged individuals to provide formal feedback on the proposal via paper forms that were distributed by hand at each stage to local residents, or via the dedicated website. Feedback could also be provided to a dedicated email address and postal address.

A total of 150 comments were received indicating the wide reach of the consultation. A number of these have had an impact on the eventual scheme now submitted through the planning application. In addition, further consultation and community updates have also taken place in January – February 2022. The result of this consultation are detailed in the submitted Consultation and Involvement Statement.

Public Consultation

On the 23rd of February 2022, sixteen (16) site notices were displayed on and near the site along surrounding streets. Notification of this application was also published in the Ealing Gazette on the 23rd of February 2022.

At the time of writing this report, 236 representations have been received in objection and 1 has been received in support of the proposal through the public consultation process. The most common matters raised in these representations are summarised in the below table.

Material Planning Objection	Planning Officer’s Response
<p><u>Overdevelopment</u></p> <ul style="list-style-type: none"> - The development would result in overcrowding and would be an overdevelopment of this site 	<p>The proposed development has been developed to ensure the best, and most efficient use of the land, which in this case, would involve the redevelopment of currently significantly underutilised space for the redevelopment of much needed affordable homes in the borough.</p> <p>The density of development is not considered to be excessive, and the applicant has demonstrated that the impacts of the scheme can be sufficiently mitigated.</p>
<p><u>Impact on Character & Appearance</u></p> <ul style="list-style-type: none"> - The proposal would be out of character with the surrounding properties and local community - The proposal would be out of keeping in terms of its height in relation to neighbouring two storey dwellings 	<p>Through the design process, the proposed development has had several reductions in height, to a maximum of five storeys. Adjacent to the school, the development would be three storeys tall, only one storey taller than the surrounding area. This is considered to be a gentle and appropriate transition in height.</p>

	<p>Several design elements have been incorporated into the design to ensure the perceived height and massing is sufficiently broken down. It is also noted that the healthy street and proposed tree planting will soften the appearance of the site, acting as a visual buffer.</p> <p>While it is recognised that the height and contemporary design of the proposed blocks would not mimic the surrounding terraced houses, the overall design is considered to be exemplary and would not result in harm to the visual amenity of the area. It is also noted that approximately 250m from the site is Grange Court, which contains two blocks of flats at 3 and 5 storeys in height. Therefore, the proposal would not be material taller than existing buildings within the medium term context.</p>
<p><u>Impact on neighbouring Amenity</u></p> <p>The proposal would have a detrimental impact on neighbouring amenity in terms of:</p> <ul style="list-style-type: none"> - noise nuisance - Loss of sunlight/daylight - Loss of privacy from overlooking into neighbouring properties and into the school - Loss of outlook 	<p>It is recognised that the construction phase of the development could result in nuisance to neighbouring amenity for a temporary period. To ensure this nuisance is sufficiently mitigated, any consent at this site would be subject to a condition that requires the applicant to submit, for the approved of the LPA, a detailed construction management plan (CMP). This CMP will require details of mitigations measures regarding noise, dust, vibration and external lighting, as well as highways considerations, all in the interest of protecting neighbouring amenity.</p> <p>A Daylight and Sunlight Assessment has been submitted as part of the application which demonstrates that the proposed development would not result in unacceptable impacts on neighbouring properties in terms of a harmful loss of light.</p> <p>Potential overlooking and privacy concerns have been carefully considered by the Council and the design team. The buildings facing properties on Rushdene Crescent, and Hartfield Avenue has been set back and/or orientated to limit overlooking. It is also noted that any views to these properties would be across the road. As such the layout has been well considered to avoid potential overlooking.</p>

	<p>As above, the mews houses adjacent to the school has been stepped down in height to minimise overlooking. There would be a limited number of windows that face the school from these family homes, with a limited degree of potential overlooking that is not considered to harm the amenity or safety of the school or its pupils.</p>
<p><u>Highways Impacts</u></p> <ul style="list-style-type: none"> - The proposal would result in additional parking stress on local streets and increased congestion - Increased congestion would be unsafe for school children 	<p>Concerns regarding the impact of the proposed development on the local transport network and on local parking stress are acknowledged. The applicant has submitted a detailed Transport Assessment which demonstrates that to impact of the development is not likely to be significant, despite the perceived potential impact on 92 additional homes in the area.</p> <p>It has been concluded by the transport technical consultant team that the impact of the development proposals upon the wider transport network can be accommodated and sufficiently mitigated. The Councils Transport Services department have reviewed the submitted Transport Statement and raised no objection to their findings in principle.</p> <p>In terms of parking, the development has been designed to meet its own parking needs within the site (27 spaces, of which 9 will be reserved disabled parking). As set out in the Transport Assessment, the site could generate ownership of up to 40 vehicles. A total of 27 vehicles will be contained within the site and the parking provision proposed. The potential overspill would be a total of 13 vehicles. A parking beat survey has been undertaken and is set out within the Transport Assessment this demonstrates that there are 38 spaces available overnight at the period of highest demand, below the 85% capacity threshold. The site will also be managed by a Travel Plan and will seek to reduce car ownership as part of its targets. In addition, the proposal seeks to encourage sustainable modes of transport through cycle parking provision and an improved pedestrian and cyclist experience around the site.</p>

	<p>In order to ensure that any impacts are sufficiently mitigated, various conditions of consent have been recommended, requesting further details related to servicing and deliveries, a detailed Construction Management Plan, and an updated travel plan.</p> <p>In addition, any future consent at this site would be subject to a S106 legal agreement, requiring financial contributions to put towards the following mitigation measures:</p> <ul style="list-style-type: none"> - A review and implementation of a controlled parking zone (CPZ) near the development, along with a legal obligation restricting all future occupants from applying for parking permits within this CPZ. - Cycle infrastructure improvements in the area - Bus stop improvements in the area - Traffic calming and pedestrian crossing facilities <p>In addition to this, it is noted that the applicant also seeks various highways improvements, including the introduction of a health street for improved pedestrian and cyclist experience.</p> <p>Given all of the above, it is considered that the potential impacts have been sufficiently mitigated in this case.</p>
<ul style="list-style-type: none"> - <u>Public and Community Facilities</u> - The proposal lacks local amenities and outdoor play space - Objections were raised to the loss of the community centre - The proposed level of occupancy will put pressure on already strained existing local facilities, amenities and local transport in the area 	<p>The proposal would provide 3,350 sqm of publicly accessible open space, comprising:</p> <ul style="list-style-type: none"> a 1,070 sqm Healthy Streets area b 820 sqm new public park c 340 sqm of Play Street areas d 600 sqm children’s play area in landscaped play deck at Level 1 e 520 sqm the Mews (of which 140 sqm of dedicated children’s play space) <p>As such, it is considered that the proposal would provide sufficient amenities and outdoor space.</p> <p>The importance of wider community uses is recognised by the Council. However, it should be noted that the existing community centre has been closed for five years now and the site is not located</p>

	<p>in an area an area of defined need as identified in the borough’s social infrastructure needs assessment. The site was vacated in 2017 and the community use relocated at that time. It is also noted that permission to demolish the community centre has previously been granted. However, it is also noted that the proposed scheme would deliver several other important public benefits, including the provision of a health street along Rushdene Crescent, a far more useable public active park, and the provision of 100% affordable homes in the borough.</p> <p>In terms of the strain these additional homes would place on existing local facilities and amenities, it is noted that any consent at this site would be subject to a S106 legal agreement requiring financial contributions to be paid towards the NHS, leisure’s strategic sporting infrastructure, children’s play space and allotment space upgrades within the wider area, in order to mitigate the increased population in the local area as a result of the proposed development.</p>
<p><u>Environmental Health</u></p> <ul style="list-style-type: none"> - During construction, the proposal would result in noise disturbances and air pollution to the detriment of the school children 	<p>As noted above, it is recognised that the construction phase of the development could result in nuisance to neighbouring amenity for a temporary period. To ensure this nuisance is sufficiently mitigated, any consent at this site would be subject to a condition that requires the applicant to submit, for the approved of the LPA, a detailed construction management plan (CMP). This CMP will require details of mitigations measures regarding noise, dust, vibration and external lighting, as well as highways considerations, all in the interest of protecting neighbouring amenity.</p>
<p><u>Impact on the School</u></p> <ul style="list-style-type: none"> - The proposal would result in disruptions to the school and would be unsafe for children - The loss of school buildings will increase pressure on the remaining school grounds and schools in the area are at full capacity 	<p>Safety of school children is an important consideration for the LPA. The submitted Transport Assessment has included traffic flow counts and vehicle tracking, which confirms that there are no safety concerns from a transport perspective.</p> <p>However, to mitigate potential road safety concerns even further, the Council has will require any consent to be subject to S106 financial</p>

<p>- The proposal would deprive school children from open space and play space</p>	<p>contributions, including contributions towards the provision of traffic calming and pedestrian crossing facilities in the immediate area. This would be in addition to the improvements to the pedestrian experience at the site.</p> <p>Parents of children attending the school are understandably concerned with the perceived loss of school facilities. It should be noted that the approach to the demolition of the surplus school facilities has been extensively discussed in a series of meetings with school leaders. Based on the determined local need decreasing for primary schools, the school's admission will reduce to a 2-form entry school. This will result in several of the school's facilities and buildings becoming surplus to their requirements and redundant over time as the school transitions to a smaller intake of pupils. The consolidation of the school facilities on the school site will allow the school to operate in a space that is appropriate for the school's requirements. Ealing Council has been working in close partnership with the Diocese and in consultation with the school, to ensure that these new facilities fully meet the school's future needs and enhance the experience for pupils.</p> <p>In terms of play space, it is noted that a small, paved play area within the existing school would be lost. However, in its place would be a far more attractive 'active park' that would contribute more positively to children and local residents. It is also noted that the school plans to building a new MUGA within the retained school grounds.</p>
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External Consultation

Consultee	Summary of Comments	Officer Response
Local Ward Councillors	No comments received.	Noted.
TFL - Borough Planner	<p>TfL has no in principal objection to the proposed development, however the following would need to be addressed:</p> <ul style="list-style-type: none"> - The proposed streetscape improvements/traffic calming measures/public realm upgrades on Rushdene Crescent should be secured 	TfL comments have been noted. The recommendations, conditions, and S106 obligations have been considered and incorporated where appropriate (See:

	<p>via 278 agreement with Ealing. These improvements are welcomed and supported in accordance with London Plan policy T2 Healthy Streets.</p> <ul style="list-style-type: none"> - TfL is supportive of the “car-lite” proposal irrespective of the PTAL rating of 1b. TfL supports the creation of a new CPZ as highlighted within the Transport Assessment (point 3.11.6) with this to be secured within a legal agreement. The 27 car parking spaces provided is much lower than the 138 spaces allowed under the ratio of 1.5 spaces per dwelling. It is expected that 20% of spaces will be EV charging enabled from the outset with 80% passive provision. TfL is supportive of the proposed disabled/electric vehicle spaces in line with policy T6 of the London Plan (2021), these elements should be retained via condition. - The cycle spaces should meet the requirements of the London Cycle Design standards. 163 Long-stay cycles (including 7 accessible spaces) are proposed to be stored within two shelters located to the east and west of the site with access via the car parking area and an alternative door. 2 visitor ‘Sheffield’ type cycle spaces are proposed. The proposed cycle parking should be retained in line with policy T5. Details should be secured via condition. - It is requested that the proposed Car Parking Management Plan also takes into account cycle parking management in addition to the management and allocation of the general/ blue badge spaces. The Management Plan should be secured via condition. - A Travel plan should be secured by condition. - It is recommended that servicing is located off-street in accordance with 	<p>Transport impacts and servicing section; Heads of Terms and Appendix A).</p>
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	<p>London Plan policy T7. However, as the development is surrounded by borough roads the delivery, servicing and refuse arrangements should be ultimately discussed and agreed by Ealing.</p> <ul style="list-style-type: none"> - A full Construction Logistics Plan (CLP) would need to be produced in line with current TfL CLP guidance, the plan must consider the safety of road users in the vicinity, in particular pedestrians and cyclists. Adequate measures must be provided to ensure safety and construction traffic movements must be planned to minimise impact during the peak hours. 	
NHS Property Services	No comments were received from NHS property services directly. However, a local NHS surgery commented, noting that their patient list has been growing over the last few months and it is expected that the proposed redevelopment will add a significant number of patients to their list. It was requested that S106 funding be secured to mitigate the influx.	Noted. S106 contributions towards the NHS has been included in this recommendation, calculated using the HUDU model (See: Heads of terms).
Design Out Crime	No objection in principle was raised, subject to a condition requiring the development to achieve secure by design accreditation.	Noted. The requested condition has been included in this recommendation (See: Appendix A).
Thames Water Utilities Ltd	Raised no objection in principle subject to appropriate informatives and condition of consent, requiring a Piling Method Statement to ensure the safeguarding of nearby underground sewerage utility infrastructure.	Noted. The requested condition and informatives have been included in this recommendation (See: Appendix A).

Internal Consultation

Transport Services	Raised no objection to the proposed development subject to appropriate mitigation measures through S106 obligations and contributions, and subject to appropriate conditions of consent.	Noted. The requested S106 contributions and obligations as well as the requested conditions of consent have all been included in this recommendation (See: Transport impacts and servicing section; Heads of Terms and Appendix A).
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Regeneration	No comments received.	Noted.
Pollution Technical (EH)	<p><u>Noise:</u></p> <p>Raised no objection to the proposed development subject to appropriate conditions of consent.</p> <p><u>Contamination:</u></p> <p>It would appear, based on historical info and risk assessment, there is a low potential for the site to be contaminated. The subsequent site investigation, undertaken mainly due to the change of use to residential has not detected significant contamination.</p> <p>Therefore, no objection was raised to the proposed development on contamination grounds.</p> <p><u>Air Quality:</u></p> <p>Noted that the proposed development is not air quality neutral for Transport emissions hence it is recommended further mitigation is sought. However, no in principle objections were raised, subject to clarifications and appropriate conditions of consent, as well as a financial contribution towards air quality monitoring.</p>	<p>These comments have been noted. The recommendations, conditions, and S106 obligations have been considered and incorporated where appropriate (See: Impact on neighbouring amenity and Environmental Health sections below; Heads of Terms and Appendix A).</p>
Waste and Street Services	No comments received.	Noted.
Councils Landscape and Tree Officer	<p>Raised no objection to the proposed development subject to S106 funding for improvements to local open spaces due to shortfall of play and allotment space.</p>	<p>Noted. The requested S106 contributions for improvements to local open spaces due to shortfall of play and allotment space have been included in this recommendation (See: Heads of terms).</p>

Councils Energy Officer	Raised no objection to the proposed energy strategy subject to appropriate S106 obligations and contributions, and subject to appropriate conditions of consent.	Noted. The requested S106 contributions and obligations as well as the requested conditions of consent have all been included in this recommendation (See: Energy and sustainability section in below report; Heads of Terms; and Appendix A).
Councils Flood Risk Officer	Raised no objection in principle, subject to an appropriate condition requiring compliance with the submitted Sustainable Urban Drainage strategy.	Noted. The requested condition has been included in this recommendation (See: Appendix A).
Active Ealing - Environment and Leisure	In summary, the proposal would generate additional demand on existing and future sports facilities. No objection was raised in principle, subject to appropriate mitigation in the form of a S106 contribution to offset the impact of this increased demand. The amount requested has been generated using the Sport England's Sports Facility Calculator model.	Noted. The requested S106 contribution has been included in this recommendation (See: Heads of terms).
Education Services	No comments received.	Noted.
CCTV Systems Manager	No comments received.	Noted.

PLANNING POLICIES

Please see informative section in **Appendix A** for a full policy list.

REASONED JUSTIFICATION

This proposal has been assessed against the relevant policies outlined in the policies section referred to above. The key issues in the assessment of this planning application are the:

- Principle of the proposed development
- Design, appearance, and impact on character of the area
- Impact on ecology and the neighbouring SINC
- Impact on trees
- Quality of the proposed living accommodation
- Housing mix
- Affordable housing
- Impact on amenity of neighbouring occupiers

- Environmental health
- Transport impacts and servicing
- Refuse and recycling
- Energy and sustainability
- Flood risk and surface water management
- Fire Safety

A detailed assessment of the proposal is set out as follows.

The Principle of the Development

Demolition

The demolition of the existing community centre, school buildings, playground, MUGA and other associated structures has previously been approved under planning permission ref: 213792HYBRID. Demolition is due to commence on site under that permission in Summer 2022. Therefore, the principle of the demolition of the former Northolt Grange Community Centre and part of the school buildings has already been established.

Loss of Community Use

The proposed development includes the demolition of the Northolt Grange Community Centre. This community centre has been vacant and out of use since 2017 with all user groups relocated at that time. The key policy considerations in this regard are outlined below.

Core Policy 6.2 defines community centres as social infrastructure and states that targets for housing and employment development provide an opportunity to modernise and improve facilities, but they also place pressure on the environment.

London Plan Policy S1 (Part D) seeks to make best use of land, including the public-sector estate, through redevelopment for affordable housing. Policy S1 (Part F) states that proposals that would result in a loss of social infrastructure in an area of defined need as identified in the borough's social infrastructure needs assessment should only be permitted where there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community or the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs. The site is not located in area of defined need.

Part G of Policy S1 states that redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered. A review of the proposed scheme in terms of its compliance with the aims and objectives of the above policy is set out below.

The existing community centre has been closed for five years now and the site is not located in an area an area of defined need as identified in the borough's social infrastructure needs

assessment. The site was vacated in 2017 and the community use relocated at that time. It has been identified as a potential site for residential uses since 2018.

Given the above, it is not considered that the proposed replacement of the existing closed community centre with 92 affordable homes would be a direct conflict with the above policy despite the lack of proposed re-provision. In any case, the site would deliver greater public benefits than the retention of the existing community centre would, should planning be refused, in the form of not only the delivery of much needed genuinely affordable housing in the borough, but also through the delivery of the proposed health street and active park. It is also noted, as mentioned above, that the demolition of this Community Centre has already been granted under reference number 213792HYBRID. As such, the proposed loss of the existing community centre is considered acceptable on balance in this case.

Loss of School Facilities

The approach to demolition has been discussed in a series of meetings with school leaders. St Raphael's Catholic Primary School is currently a 3-form entry primary school. From the 2020/21 academic year, the school's admission will reduce to a 2-form entry school, based on the determined local need decreasing.

This will result in several of the school's facilities and buildings becoming surplus to their requirements and redundant over time as the school transitions to a smaller intake of pupils. The consolidation of the school facilities on the school site will allow the school to operate in a space that is appropriate for the school's requirements. The school facilities to be demolished are to be re-provided on a consolidated school site to meet future needs of the school. This is in line with the objectives of the Planning for Schools DPD, which seeks to ensure the amount of primary and secondary school places provided meets the needs of the borough. As such, the proposed loss of a small percentage of the schools' buildings is considered acceptable in this case.

Removal of Multi-Use Games Area (MUGA)

The Multi Use Games Area (MUGA) is located to the north of the site and is currently in a state of disrepair and unused. This area has no passive supervision and has been linked to anti-social and unsafe behaviour, which discourages its use for sports activities.

The provision of a new area of hard standing within the school grounds will provide a more useable and safe active space for the school. In addition, the area of the MUGA has been identified to be potentially redeveloped as part of the future residential development an active park, with associated health benefits for the wider community.

London Plan Policy S5 states existing sports and recreational land should be retained unless: an assessment has been undertaken which clearly shows the sports and recreational land or facilities to be surplus to requirements; the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. In this case the re-provision of useable public space in the form of an active park, the

significant public realm benefits in the form of the proposed healthy street, along with the provision of 92 much needed affordable homes in the borough, would all be considered a betterment than the existing use of this MUGA. It is noted that a new MUGA was granted within the school grounds under planning application reference 213792HYBRID, which also granted the removal of the existing MUGA. As such, the principle of the loss of the existing MUGA is considered acceptable in this case.

Proposed Residential Use

Paragraph 119 of the NPPF (2021) states that planning decisions should promote an effective use of land in meeting the need for homes in a way that makes as much use as possible of previously developed or 'brownfield' land. The NPPF defines brownfield land as land which was previously occupied by a structure. Paragraph 68 of the NPPF states that 'Small and medium sized sites can make an important contribution to meeting the housing requirement of an area'. The proposed development is in accordance with the principle of the NPPF, as well as local and national policy in this regard.

Increasing the current housing stock is an important strategic objective for the London Borough of Ealing. Ealing Council has a ten-year housing supply target of 21,570 units in The London Plan. The London Plan seeks to increase the housing supply and optimise the potential for housing delivery on all suitable and available brownfield sites through their planning decisions.

Policy H1 of the London Plan 2021 refers to the need to increase housing supply to meet demand within London, with Policy H9 of the London Plan 2021 promoting the efficient use of existing stock. The proposed site is therefore considered to be in accordance with the guidance of the London Plan, with the proposed development making an important contribution towards Ealing Council meeting its housing supply target.

The proposal to provide additional residential units would contribute towards both Borough specific and London-wide strategic housing targets in a residential location and is acceptable in principle, subject to other material considerations including: quality and layout of the proposed living accommodation; design and appearance; impact on nearby occupiers and traffic and parking considerations.

Additionally, as part of the London Borough of Ealing - Strategic Housing Market Assessment Update (2018) states, "Figure 35 shows a significant need for family sized housing to be provided as part of any market housing mix." The development would create 19 family sized units (3- and 4-bedroom units), as well as 30 2-bedroom units which could be used by smaller families, which would contribute towards meeting the need for larger units in the London Borough of Ealing.

Given the above, it is considered that the proposed introduction of residential use at this site would be acceptable in principle and would accord with a strategic objective of the borough.

Design, appearance, and impact on character of the area

The NPPF (Section 12 'achieving well designed places') states that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Paragraph 134 of the NPPF emphasises how significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings. The National Design Guide (2021) sets out ten characteristics of beautiful, enduring and successful places, comprising: context; identity; built form; movement; nature; public spaces; uses; homes and buildings; resources; and lifespan.

Policy D3 (Optimising Site Capacity Through the Design-Led Approach) of the London Plan (2021) indicates that development must make the best use of land by following a design-led approach that optimises the capacity of sites. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity.

Policy D6 of the London Plan (2021) and policy 3.5 of the Ealing Development Management DPD (2013) provides that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. Policy D4 of the London Plan (2021) seeks to ensure that new development is informed by and complements its surroundings.

The above policy is reinforced by policies 7.4 and 7B of the Ealing Development Management Development Plan (2013) which state that developments should complement their street sequence, building pattern, scale, materials and detailing and should have high quality architecture.

Policy 3.8 of the Ealing Development (Core) Strategy (2012) requires the protection of the residential, suburban, character of much of the wider A40 Corridor whilst providing for further residential development, including affordable housing, largely at identified locations, and including proposals for the regeneration of municipal housing estates.

An assessment of the proposed scheme in accordance with the above policy framework is set out below.

Height and massing

The applicant has submitted a detailed Design and Access statement (DAS) in support of the proposal. This document demonstrates and outlines how the proposed building form and massing has developed through an iterative design process, including testing the design for its impact to the surrounding area, the wider viewing corridors, as well as environmental considerations such as daylight / sunlight and sustainability considerations such as solar gain. It is clear that an important part of the design process has been to carefully balance the building footprint size to its height, while providing efficient and quality buildings. Privacy has been a key design driver to the proposed massing on Site. Minimizing overlooking to

both the school, as well as adjacent properties has informed the design of the proposals, resulting in the proposed placement of mass, and the form of the buildings being sculpted, taking views away from the street and school. *Figure 6* below demonstrates that despite being taller than its immediate context, the proposed development would not appear obtrusive or dominating, but would rather sit comfortably within its context.

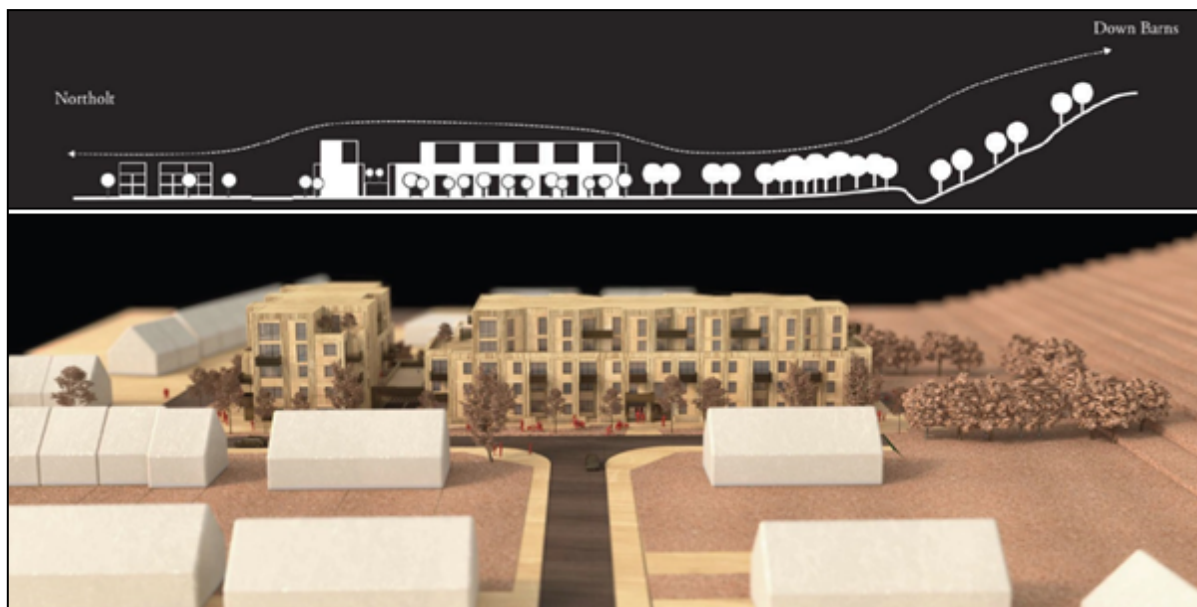


Figure 6: Height and massing model (extracted from submitted DAS)

The surrounding area is characterised by primarily semi-detached type housing of 2 storeys in height with pitched roofs. Each of the mansion blocks would be arranged over 5 storeys, without a basement, and the mews houses are arranged over three storeys. Design detailing is used to minimise the linear massing of the development, breaking the building into a base, middle and a top, which helps with legibility while also creating a series of horizontal layers, which reduces the perceived height.

The double height recessed facades of the two upper floors provide a natural rhythm to the base of the building, implying a datum at level two which responds to the height of the brickwork of the adjacent neighbouring houses. The body of the mansion blocks would be completed through the addition of the third floor. This floor does not have any inset street facades but is articulated through projecting balconies. The third-floor acts as a transition level between the implied base and the top to the buildings.

The top floors of the mansion blocks are highly articulated, which reinforces the appearance of the building as a three-storey building with a top. The top is defined through a series of strategies which include setting parts of the facades back from the street to allow for increased privacy which is enhanced through the creation of facades not parallel to the street.

Through the design process, the proposed development has had several reductions in height, to a maximum of five storeys. Adjacent to the school, the development would be three storeys tall, only one storey taller than the surrounding area. This is considered to be

a gentle and appropriate transition in height. It is also noted that the healthy street and proposed tree planting will soften the appearance of the site, acting as a visual buffer.

While it is recognised that the height and contemporary design of the proposed blocks would not directly mirror the surrounding terraced houses, the overall design is considered to be exemplary and would not result in harm to the visual amenity of the area. It is also noted that approximately 250m from the site is Grange Court, which contains two blocks of flats at 3 and 5 storey's in height. Therefore, the proposal would not be materially taller than existing buildings within the medium-term context.

Layout

The current site offers no public access and operates as an island, which is in part used by the school. Whereas the proposal would allow for more of this space to be usable to the community, through the proposed pedestrian and public realm improvements, but also through making the site more permeable and by providing a publicly accessible park.

The layout of the buildings has been arranged to create a publicly accessible perimeter open space strategy which incorporates a healthy streets approach to both Rushdene Crescent and Hartfield Avenue. The increased permeability of this site has been developed through the provision of a linked sequence of public spaces. Adjacent to St Raphael's Primary School, the site would become a new, safe and pleasant route to the school for many families travelling by foot.

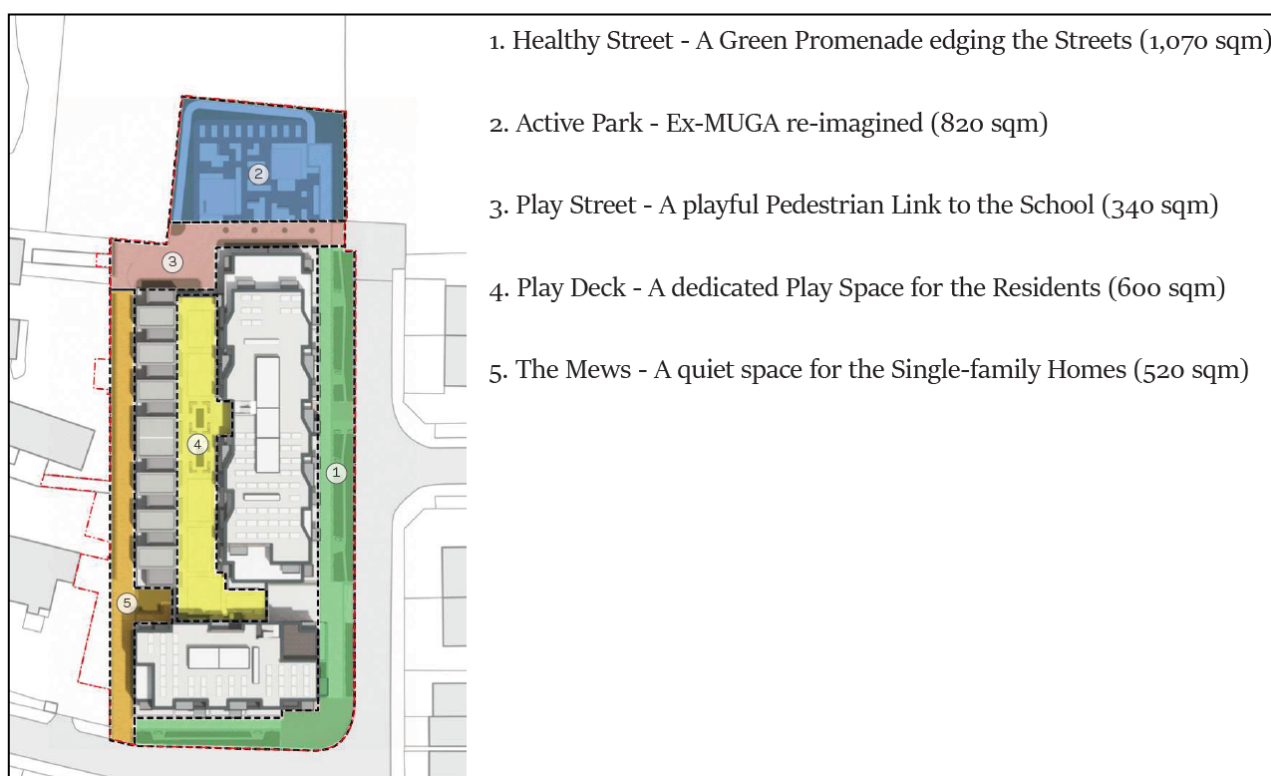


Figure 7: Site Layout

The proposed development would improve the streetscape significantly. The proposals seek to position the buildings generously set back from both Rushdene Crescent and Hartfield Avenue, while proposing to bring the pavement within the site. The resulting healthy street, or green activity strip, would line the edge of the site, providing a range of landscaped and hardscaped areas. By providing a green active buffer to the road, safety is increased, reducing the risk of pedestrians stepping out onto the road through a green physical barrier. Trees along this section of road would add natural shaded and shelter while offering privacy and a soft, visual buffer to the adjacent properties.



Figure 8: Healthy Street concept

Ground floor homes would be accessed from this health street and would be provided with generous private gardens and incorporate defensible planting zones making the experience more attractive, while addressing privacy of ground floor residents.

The adopted healthy streets approach to both Rushdene Crescent as well Hartfield Avenue will wrap around the southern and eastern sides of the site, providing a new green route linking the schools existing entrances on Hartfield Avenue to the new proposed school access at the north-west of the site. As part of promoting pedestrian movement, a new publicly accessible park to the north of the site is proposed, positioned where the existing MUGA is located.

By positioning homes overlooking the park, the park will receive passive supervision, overlooked by windows and front doors which will help people feel safe and reduce the risk of crime. The proposed new park would provide a range of spaces based around the theme of an active life.



Figure 9: View from the Active Park

Appearance and visual impact

The proposed scheme would be comprised of three building blocks with two distinct typologies. The two main blocks feature a consistent red brick palette and a common façade module whilst the mews building features a lighter grey brick. This is in keeping with the surrounding area and its local character, which accords with Development Management Policies 7.4 and 7B and Core Policy 3.8. Development Management Policy 7.4 sets out that development in Ealing should complement their street sequence, building pattern, scale and detailing. The proposed buildings have been designed to be separated into a base, middle and a top, which helps with legibility while also creating a series of horizontal layers, helping to bring the perceived height of the buildings down and helping them to integrate with the surrounding context. The buildings have been designed to carefully balance the building footprint size to building height, while providing efficient and quality buildings.

The visual impact of the buildings has been carefully considered, with the placement of height only where beneficial and allowing plentiful spaces around the buildings for public use. The external quality of the building has also been thoroughly considered. The design has incorporated several elements that ensure a robust design and appearance is achieved. For example, the ground floor has been designed to be active and incorporates simple, clear and fully glazed building entrances. The facades of the buildings are highly articulated, with deep façade returns.

The use of materials, including metal framed windows and the use of brick for the facades, ensures that the external facing materials are of a high quality and appropriate to the site context. The proposed base material for all the buildings is brickwork which is proposed in two tones; warm brown / buff colour for the mansion blocks and a light grey colour for the mews housing. The use of two different bricks will allow a clear identity to the main building typologies on the site. The design proposes to use the brick material in different ways to create visual interest, through the incorporation of the following techniques:

- Hit and miss brick walls to ground floor terrace spaces
- Flemish bond brickwork to main body of the building, and brick piers
- Soldier course brickwork headers above windows and doors
- Vertical textured brickwork used by setting back the face of the full brick on the repeat course Flemish bond to tops of the buildings
- Hit and miss textured walls to blank ground floor areas for landscape growing

Metal is proposed for the entrances and balconies, which would utilise a green, vertical slat metalwork as a contrasting colour and material. All metal work will be a single colour, a warm green, which takes inspiration for the Down Barns Hill to the north of the site.



Figure 10: CGI View from junction of Hartfield Avenue and Rushdene Crescent



Figure 11: Artist's Impression of the Mews Looking North-East

The corners of the buildings have been carefully designed, being inset to the plan of the building, allowing balconies to be positioned into this space, creating visual interest as well as assisting in breaking down the perceived bulk of the building. The upper floors of the mansion blocks are generally more glazed and appear lighter than the base and middle of the building. Smaller details, such as ensuring all plant equipment at roof level are screened, and proposing internal rainwater pipes, all add to the overall quality of design.



Figure 12: Extracts of elevations from the Design and Access Statement

The submitted DAS also addresses the visual/ townscape impact of the proposal, through a series of studies exploring mid-range, intermediate and immediate views. The studies conclude that the development will not be visible from any of the key routes into the wider area around the site and will have little or no impact on views in the intermediate and immediate views.

The visual impact of the proposed development has been carefully considered, as set out in the DAS, and is considered to offer an outstanding quality of design which makes a positive and appropriate contribution to the site's local context in accordance with local planning policy. The proposed height of the development is therefore considered appropriate in the context of the site's location.

Landscaping

London Plan Policy G1 (Green Infrastructure) suggests that proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network. Policy G4 (Open Space) indicates that proposals should not result in the loss of protected open space and, where possible, create areas of publicly accessible open space, particularly in areas of deficiency. Policy G5 (Urban Greening) suggests that proposals 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 (including trees), green roofs, green walls and nature-based sustainable drainage.

Policy 5.10 (Urban Greening) of the Ealing Development Management DPD (2013) indicates that development proposals should replace existing trees and plantings on the basis of no net loss of amenity.

The proposed scheme is supported by a comprehensive landscaping plan, which incorporates 5 key landscaping elements within the development site. These include the proposed 'Health Street', a green promenade edging the streets; an 'active park' to the north of the site, which replaces the existing MUGA; a 'play street' that would run along the southern edge of the active park, creating a pedestrian route through to the school; a 'play deck' located on the car park podium, a dedicated play space for residents; and a quieter, lightly landscaped, semi-private Mews entrance area.

The healthy street concept includes the reconfiguration of Rushdene Crescent with a green edge by setting the buildings further back from the current property line and so allowing a landscaped public realm to connect to the new public park to the North. By moving the pavement within the site, this has allowed for the paved footpath to be protected by a linear green edge. The healthy street concept would wrap around the Rushdene/Hartfield Avenue corner, so that the site is edged by high-quality public space on all street's sides.

The proposed active park element would be located at the north of the site in place of the existing MUGA. Two separate square-shaped areas are located in the central space of the Active Park, equipped with basic outdoor-gym furniture, such as wooden posts and

metal bars for people to train freely in outdoors. These two spaces are paved in coloured rubber tarmac, which provides for a comfortable texture for outdoor exercise.

The pedestrian promenade along Rushdene Crescent would connect with a proposed ‘play street, which would run along the southern edge of the active park, leading to a secondary entrance to the adjacent School. The creation of this new connection provides children with a dedicated and protected route to enter the school premises skirting by the Active Park. The pedestrian link has been designed with the typology of the play street in mind, including playful patterns on the main paving surface, the use of children-friendly materials integrated in the paving and aligned with the character of the space.

The ‘Play Deck’ would be located on the roof of the Car Parking Podium, at first floor level. This is a rectangular, linear space covering an area of approx. 600sqm. The space would be configured with a series of recreational zones, defined by a dedicated paving and colourful patterns painted directly on the paving.

A pedestrian zone giving access to the row of single-family homes located to the western side of the site, this linear space would be paved, with strips of defensible planting screen the windows of the rooms located at ground floor, ensuring the appropriate level of privacy while softening the western elevation of this row of homes.

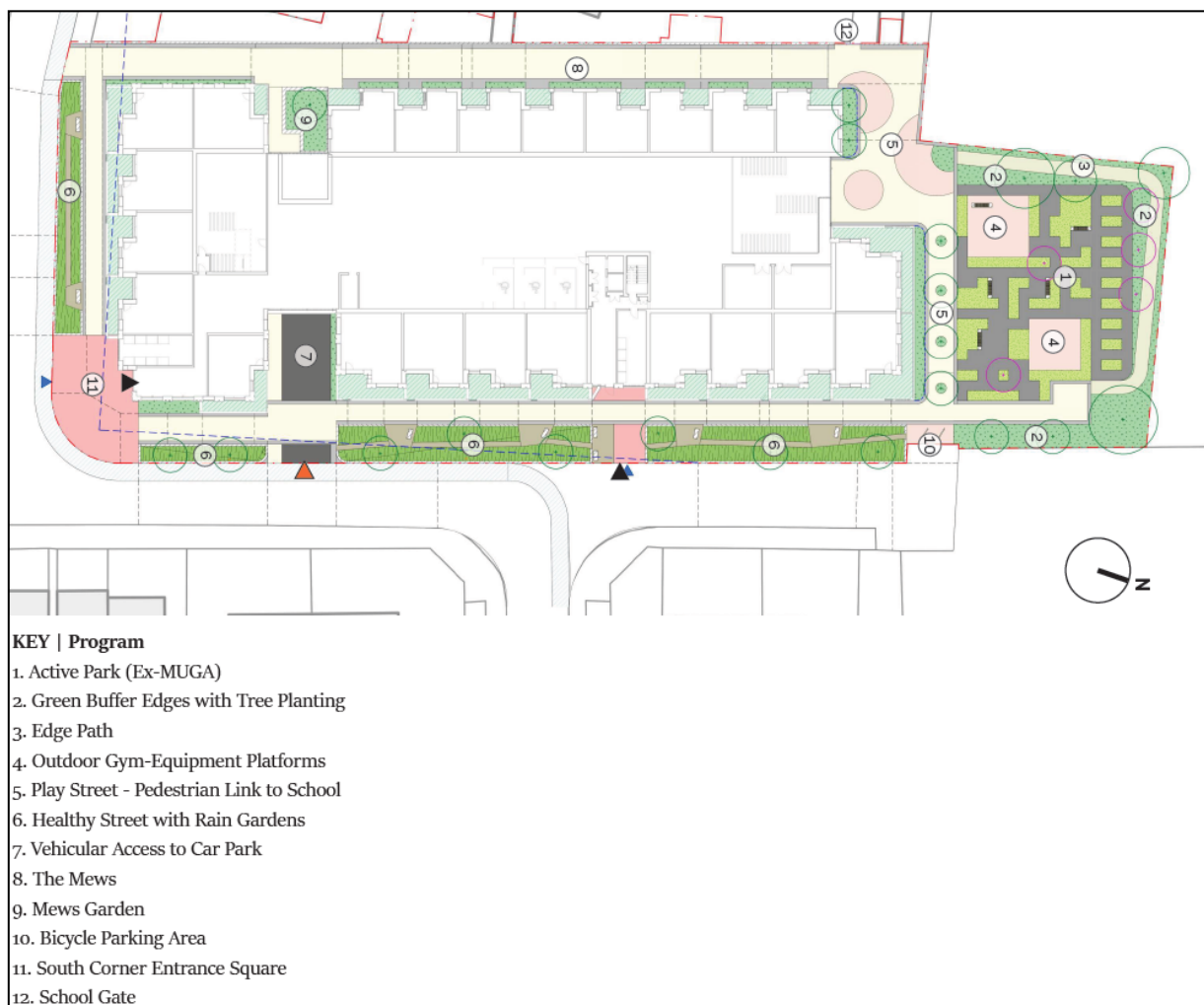


Figure 11: Landscaping Plan Overview

Public Open Space

The site is located within an area identified as being deficient in parks and open space. In line with Core Policy 5.5, the proposals seek to address deficiency in access to open space in the borough, through the provision of a range of new landscaped areas. As a result, it also positively contributes to the London Plan's vision of a greener London, outlined in Policy G5.

A new public open space is proposed in place of the MUGA which has been associated with antisocial behaviour. This part of the site is located within the Green Belt. Core Policy 5.1 and London Plan Policy G2 seek to protect and enhance the network of Green Belt within London. By opening this area up to the public and by re-landscaping the area, the Green Belt will be protected and enhanced in line with these policies. This new park area will also benefit from natural surveillance, creating safe and high-quality amenity space for new residents of the development and the wider Northolt community.

Development Management Policy 7D indicates that all development that increases demand for open space will be expected to make an appropriate contribution towards meeting this additional demand. The policy sets out that development of housing between 10-149 units qualifies for open space provision and sets the requirement of 19.5sqm per person. The development will deliver 92 residential units of varying unit sizes. Using Table 7D.2 of the policy would result in a policy calculated requirement of 4,892sqm. The proposed development would deliver a total of 2,750sqm of public open space within the site, which is divided between of 1,170sqm high-quality open space distributed around the edges of the development and 980 sqm of ex-MUGA located in the new park for the residents. There is therefore a recognised shortfall in the provision of public open space on site. Policy 7D states that where there is a shortfall of provision on site, a financial contribution may be required. However, the supporting text of policy 7D also states that when determining the required level of public open space provision, regard should be had to the amount of private and communal outdoor amenity space proposed beyond the baseline standard, and the overall site area. Typically, for those developments, which make a high level of provision of private/communal garden space beyond the baseline standards, additional public open space provision may not be required.

For a development of this size a total of 1380sqm of private amenity space would be required. The proposed development would deliver 2750sqm of private/communal amenity space, which is divided between of 1,170sqm high-quality open space distributed around the edges of the development and 980 sqm of active park space located to the north for both local residents and future occupiers of the site. This means the development provides amenity space above the required baseline. All considered, the proposal would be acceptable of balance in terms of the quantum of public open space provision.

Given the above, the proposal is considered to be in accordance with the aims and objective of policy G5 of the London Plan (2021); policy 5.5 of the Ealing Core Strategy (2012) and policy 7D of the Ealing Development Plan DPD (2013).

Play space

The GLA calculator has indicated 79 children would likely occupy the new dwellings across the site. The London Plan indicates a requirement of 10sqm of children play space per child to be provided on site to accommodate children’s play on site.

Much of this provision would be catered for through the proposed play deck, which joins all 3 building blocks in the centre of the site at first floor level. The proposed play deck provides a usable cover to the parking which lays below. The design of the play deck provides shelter on 3 sides, while the elevation to the north is left open, allowing visual connection to the new public park and the Down Barns Hill beyond.



Figure 12: Play Deck CGI

Additional play space is provided along the mews street. The idea is that this street caters for slightly older children through a variety of play measures such as grow boxes.

Allotment Space

Ealing Development Management DPD policy 7D states that 1.7sqm of allotment space is required per person. As none has been provided within the proposed scheme, a section 106 contribution is required in accordance with policy 7D. This contribution has been included in this recommendation (See: Heads of terms above).

Urban Greening Factor

London Plan Policy G5 recommends that London boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required for new developments. The Mayor of London recommends a target score of 0.4 for predominantly residential developments and 0.3 for commercial developments.

In the proposed scheme, the UGF achieved is currently 0.23. This value is expected to increase up to 0.25 once the proposed trees are mature. However, it should be noted that the UGF for this scheme could be increased up to 0.45 if the SINC area to the north of the site were to be included in this calculation, which is included in the Site Property Boundary but currently excluded from this Application Boundary. For this reason, the proposal is considered to be acceptable in this regard.

Designing out crime

Policy 7.3 (Designing Out Crime) suggests that applicants should consult with the local Metropolitan Police Crime Prevention Design Advisor (CPDA) and that development should make contributions to community safety works where appropriate.

The applicant has been in consultation with the local Design Out Crime Officer who has made several specific and technical recommendations. In conclusion, the Design Out Crime Officer raised no objection to the proposed development on design out crime considerations and recommended that the development achieve 'secure by design' accreditation. A condition of consent has been recommended to ensure this is incorporated. As such, the proposal would comply with policy 7.3 of the Ealing Development Management DPD (2013).

Impact on ecology and the neighbouring SINC

The Down Barns/West London Shooting Grounds to the north of the site is identified as being a Site of Importance for Nature Conservation and is within the Greenbelt.

Policy 5.1 of the Ealing Development (Core) Strategy (2012) seeks to protect and enhance the network of Green Belt through the Borough.

Policy G1 (Green Infrastructure) of the London Plan suggests that proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

Policy G4 (Open Space) of the London Plan indicates that proposals should not result in the loss of protected open space and, where possible, create areas of publicly accessible open space, particularly in areas of deficiency. Similarly, policy G5 (Urban Greening) Of the London Plan suggests that proposals 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 (including trees), green roofs, green walls and nature-based sustainable drainage.

Policy G6 (Biodiversity and Access to Nature) of the London Plan states that Sites of Importance for Nature Conservation (SINCs) should be protected. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts: avoid damaging the significant ecological features of the site; minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site; deliver off-site compensation of better biodiversity value.

An assessment of the proposed development in terms of its compliance with the above policy is set out below.

An Ecological Assessment (EA) has been prepared by The Environment Partnership (TEP) and has been submitted as part of this application. This assessment recognises that the proposed development would result in a net loss of amenity grassland, dense continuous scrub, mature individual trees, species-poor hedgerows. It is also noted that the proposals would potentially cause minor disturbance to the West London Shooting & Manor Down Site of Importance for Nature Conservation (SINC) to the northern site boundary.

The EA recommended that standard pollution prevention and dust control measures should be set out in the Construction Management Plan. This has been included in the relevant recommended condition (See: Appendix A). The EA also recommended that retained trees and hedgerows within and adjacent to the site should be protected from accidental damage during site clearance and construction, in accordance with BS5837:2012 Trees in relation to design, demolition and construction. Appropriate conditions of consent related to tree protection measures have been included as part of this recommendation (See Appendix A).

Overall, the EA concluded that no impacts on any statutory designated sites would be likely from the development proposals, owing to the lack of ecological or hydrological connectivity to the site. The site falls within the Impact Risk Zone for one SSSI. However, the activities that are listed as generating risk for this SSSI do not include residential housing.

It was also concluded that the neighbouring SINC is likely to be subject to some temporary disturbance, owing to noise and dust during construction. However, it is noted that this disturbance can be sufficiently mitigated through appropriate conditions.

It was also noted that the loss of a limited number of existing trees on site would have only a limited impact on the ecological value of the site. However, as previously noted, these trees would be replaced. No protected plant species (Schedule 8 of the Wildlife and Countryside Act) or protected wildlife species were identified within the site boundary at the time of survey. Therefore, the proposal is unlikely to have an adverse impact on protected plant or wildlife species.

Given the above, it is considered that the proposal would comply with the aims and objectives of policies G1, G4 and G6 of the London Plan (2021) and policy 5.1 of the Ealing Development (Core) Strategy (2021), subject to appropriate conditions of consent.

Impact on trees

Policy G5 (Urban Greening) of the London Plan (2021) suggests that proposals 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 (including trees), green roofs, green walls and nature-based sustainable drainage.

Policy G7 (Trees & Woodlands) of the London Plan (2021) states that development proposals should ensure that, wherever possible, existing trees of value are retained. However, if planning permission is granted that necessitates the removal of trees there should be adequate replacements.

Similarly, to the above, policy 5.10 (Urban Greening) of the Ealing Development Management DPD (2013) indicates that development proposals should replace existing trees and plantings on the basis of no net loss of amenity. An assessment of the proposed development in terms of its compliance with the above policy is set out below.

A variety of existing trees occupy the site, mainly grouped into two clusters, one to the south and one in the centre of the site. A number of trees line the road along both Hartfield Avenue and Rushdene Crescent. None of the trees on site are subject to a Tree Preservation Order.

The proposed development of this site would inevitably result in the loss of existing trees within the site. Eighteen (18) individual trees; tree groups; and 70m of hedgerow would inevitably need to be removed in order to accommodate the proposed development. These are concentrated to the eastern side of the site within the former community centre grounds and along Rushdene Avenue. No tree removal is proposed outside the application boundary.

The Council's Tree Officer has raised concern with regards to the proposed loss of trees at this site, given the level of amenity they currently provide. It is recognised that the existing trees and shrubs currently provide a high level of amenity to the local area, and their loss would have an adverse effect on the visual amenity of the area. To offset this adverse effect, a comprehensive planting and landscaping scheme is proposed. This would include the provision of 30 new trees and approximately 700sqm of new shrub planting. The proposed development would therefore have a short-term adverse effect, with the potential to result in a net balance of tree cover by the time new trees are mature, resulting in a net benefit in terms of landscaping overall, particularly when the proposed health street is considered.

As such, the proposal is considered to be in accordance with the aims and objectives of policies G5 and G7 of the London Plan and policy 5.10 of the Ealing DPD.

Quality of the proposed living accommodation

Policy D6 (Housing Quality and Standards) states that housing development should be of high quality design and provide adequately sized rooms. Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding

overheating, minimising overshadowing, and maximising the usability of outside amenity space. Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste. For private internal space, dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1 of the Plan.

Policy 3.5 (Quality and Design of Housing Development) of the Ealing Development Management DPD (2013) requires that the minimum space standards outlined within the document should be implemented for residential development, in accordance with the detailed provisions of the London Housing Design Guide and the London Housing SPG.

All of the proposed homes have been designed to meet current planning policy and housing standards set out in The London Plan 2021, while also providing the standards set out for private exterior space. The proposed homes have been designed to Part M building regulations and Nationally Described Space Standards. Where possible, design guidelines have been adopted from the Broadway Living Development Guide 2020 to incorporate exemplary design standards in neighbourhoods and homes for sustainable, healthy and affordable homes of high quality.

The interior layouts of the residential dwellings are simple and logical and provide generous spaces which have an abundance of natural light, with all of the units meeting the minimum GIA requirements set out in London Plan policy D6. The generous spaces are designed to be open plan living, dining and kitchen areas allowing for high quality flexible living spaces for residents. These living areas open onto private external amenity spaces in the form of balconies. The exception is the 4-bed Mews dwellings where the kitchen is separated from the living to allow for greater fire protection for a unit above 4.5m.

Amenity Space

Policy D6 (Housing Quality and Standards) states that in terms of private outdoor amenity space, where there are no higher local standards in the Borough, a minimum of 5 sqm. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. Ealing Development Management DPD (2013) policy 7D sets out the requirement for private outdoor amenity space. This is set at table 7D.2 in this policy, the requirement is 5sqm per 1–2-person unit, plus 1sqm for each additional occupant. This is in line with policy D6 of the London Plan.

From a review of the submitted detailed plans, it is clear that the proposed development would provide the minimum required private amenity space for each unit and in some cases would exceed this minimum requirement. As such, the proposal would be in accordance with policy D6 of the London Plan and policy 7D of the Ealing Development Plan PDP (2013) in this regard.

Accessibility

Policy D5 (Inclusive Design) of the London Plan requires proposals to; be designed taking into account London’s diverse population; provide high quality people focused spaces that are designed to facilitate social interaction and inclusion; be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; be able to be entered, used and exited safely, easily and with dignity for all; and be designed to incorporate safe and dignified emergency evacuation for all building users. Policy D7 (Accessible Housing) of the London Plan requires at least 10 per cent of dwellings to meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’, with all other dwellings to meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.

The proposed development would be providing 9 ‘wheelchair user dwellings’, with all other proposed dwellings being designed to meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’. The layout of the development is such that there would be easy access and permeability for all occupiers. As such, the proposed development would be in accordance with the aims and objectives of policy D5 and D7 of the London Plan (2021).

Housing mix

Policy H10 (Housing Size Mix) of the London Plan states that schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, consideration has been given to ensuring that a range of sized units are delivered, including family housing.

The overall unit mix across the three residential blocks is set out in Table 2 below.

Unit Size	No. of Units	Percentage
1 Bed	43	47%
2 Bed	30	33%
3 Bed	11	11%
4 Bed	8	8%

Table 3: Unit mix

When broken down into each block, the proposed unit mix would be as per Table 3 below.

Unit Size	No. of Units	Percentage
Northern Block		
1 Bed	29	54%
2 Bed	18	33%
3 Bed	7	13%
Southern Block		
1 Bed	14	47%
2 Bed	12	40%
3 Bed	4	13%

Mews Houses		
1 Bed	0	0%
2 Bed	0	0%
3 Bed	0	0%
4 Bed	8	100%
Total	92	

Table 4: Unit mix by block

Affordable housing

Policy H4 (Delivering Affordable Housing) of the London Plan sets the strategic target for 50% of all new homes delivered across London to be genuinely affordable. Affordable housing should be provided on site. Policy H6 (Affordable Housing Tenure) requires the affordable product within a development to be split as: 30% low cost rented homes (London Affordable Rent or Social Rent), a minimum of 30% intermediate rent and 40% to be determined by the Borough at low cost rented homes.

Policy 3A (Affordable Housing) of the Ealing Development Management DPD (2013) affordable housing will be sought on all developments capable of providing 10 or more residential units. This will be negotiated on the basis of a 50% provision at a 60/40 split of social or affordable rented accommodation to intermediate provision.

The proposed development would deliver a total of 92 homes, of which 100% of the units will be affordable housing. This affordable housing provision would be in the form of 84 London Affordable Rent units and 8 Shared Ownership Mews houses. This is a tenure split of 91.3% London Affordable Rent (low cost rented homes) and 8.7% Shared Ownership. The proposal would therefore far exceed the requirements set out in policy H4 and H6 of the London Plan (2021). This will make a significant contribution towards the provision of new affordable homes in the Borough.

Unit Size	No. of Units	Percentage	Affordable Housing Tenure
1 Bed	43	47%	London Affordable Rent
2 Bed	30	33%	London Affordable Rent
3 Bed	11	11%	London Affordable Rent
4 Bed	8	8%	Shared Ownership

Table 5: Affordable housing tenure type overview by unit

Unit Size	No. of Units	Percentage	Affordable Housing Tenure
Northern Block			
1 Bed	29	54%	London Affordable Rent
2 Bed	18	33%	London Affordable Rent
3 Bed	7	13%	London Affordable Rent
Southern Block			
1 Bed	14	47%	London Affordable Rent
2 Bed	12	40%	London Affordable Rent
3 Bed	4	13%	London Affordable Rent
Mews Houses			
1 Bed	0	0%	

2 Bed	0	0%	
3 Bed	0	0%	
4 Bed	8	100%	Shared Ownership
Total	92		

Table 6: Affordable housing tenure type breakdown by unit

Unit Size	Total No. of Units	Total No. of Habitable Rooms	Affordable Housing Tenure	% of total by habitable room
1 Bed; 2 Person	43	86	LAR	33%
2 Bed; 3 Person	8	24	LAR	9.2%
2 Bed; 4 Person	22	66	LAR	25.4%
3 Bed; 4 Person	2	8	LAR	3%
3-Bed; 5 Person	9	36	LAR	13.8%
4 Bed; 6 Person	8	40	SO	15.4%
Total	92	260		

Table 7: Affordable housing tenure type breakdown by habitable room

London Affordable Rent housing is considered to be ‘genuinely affordable housing’ and the high delivery of this tenure type within the proposed scheme (91.3% by unit and approximately 84.6% by habitable room) should be strongly supported by the Council and weigh heavily in the positive determination of this application. There is an identified need for affordable housing in Ealing. This scheme will assist in providing this much needed accommodation and new homes for those waiting on the Council’s Housing Register.

Impact on amenity of neighbouring occupiers

Development is expected to be sensitive to the impacts that it would have on the local area and avoid reducing the level of amenity available to both the site itself and its surroundings (London Plan - Policies D3, D4 and D6; and Development Management DPD - Policy 7A). By proposing a development that is prudently designed and sized with respect to its proximity to adjoining properties, the proposal has been found to be in adherence with local and regional policies that seek to protect the amenity available to adjoining properties.

Privacy and overlooking

Potential overlooking and privacy concerns have been carefully considered by the Council and the design team. The buildings facing properties on Rushdene Crescent, and Hatfield Avenue has been set back and/or orientated to limit overlooking. It is also noted that any

views to these properties would be across the road, at a distance of approximately 26m. As such the layout has been well considered to avoid potential overlooking.

As above, it is recognised that objections have been raised regarding potential overlooking into the retained school site and the impact this would have on the school and its pupils. The nearest part of the development to the retained school would be the mews houses located along the western side of the development.

The mews houses adjacent to the school have been stepped down in height to minimise overlooking into the school. There would be a limited number of windows that face the school from these family homes, with a limited degree of potential overlooking that is not considered to harm the amenity or safety of the school or its pupils. The degree of harm associated with this degree of potential overlooking into the school is not considered to be detrimental to the amenity or safety of the school and its pupils, nor would it be to the degree that would warrant a refusal in this case.

Other windows facing towards the school, for instance to the western elevation of the northern block, would either be oriented to face away from the school and/or would be at a distance of approximately 25m from the boundary with the school, ensuring that there would be no loss of privacy from these windows.

Outlook

Given the separation distances from the proposed development and the nearest neighbouring properties (between 23m and 26m), the proposed buildings are unlikely to result in a material loss of outlook from any neighbouring residential property.

Sunlight/ daylight impacts

A Daylight and Sunlight Report and Self-Test Daylight Report have been submitted in support of the proposal. The Daylight and Sunlight Report assessed the impact of the proposal on daylight and sunlight to the following neighbouring properties:

- 94 to 120 Rushdene Crescent (even numbers)
- 141 and 143 Rushdene Crescent
- 1, 2, 29 and 30 Edward Road
- 1 to 15 Hartfield Avenue (odd numbers)
- St Raphael’s School

The extent of this can be seen in the below image.

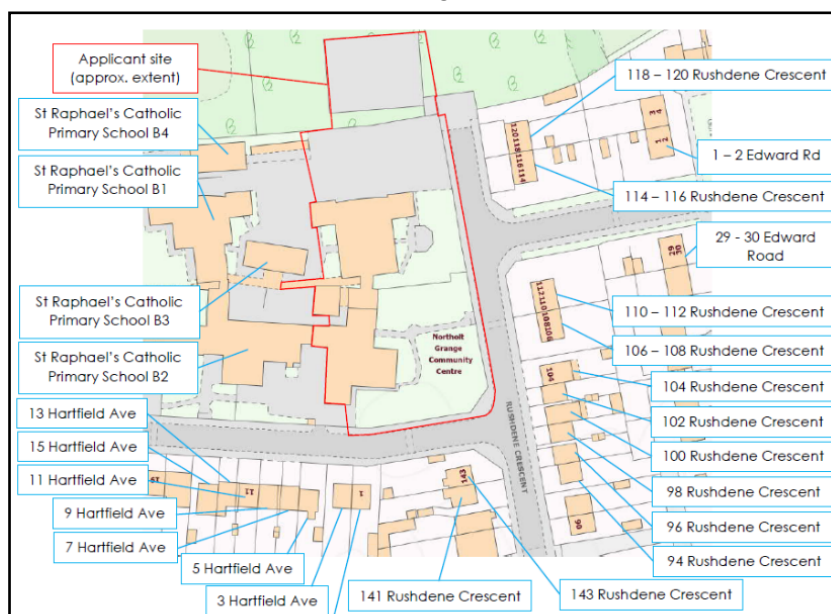


Figure 13: Extent of properties tested in the submitted Daylight and Sunlight Report
Daylight Impacts

The daylight impact on neighbouring residential properties was tested using the Vertical Skyline Component (VSC).

The Daylight and Sunlight assessment demonstrates that the proposed development has very little impact on neighbouring properties with the majority of neighbours either experiencing no effect or a minimal reduction in light. A summary of the results are set out below.

- 94 to 102 Rushdene Crescent – all tested windows pass.
- 104 Rushdene Crescent – the results show that there would be one marginal transgression in terms of the BRE guidelines caused to one of the first-floor windows at this property. However, this window would only be 2 percent below the BRE guide threshold and retains a VSC of 23.5%.
- 106 Rushdene Crescent – all tested windows pass

- 108 Rushdene Crescent – Three (3) first floor windows would be below the BRE guidelines as a result of the proposal. Generally speaking, it would be expected that the results for first floor properties such as this to be higher than ground floor properties, such as 106 Rushdene Crescent. However, the eaves of this building are relatively deep, and the windows are constructed to the underside of these eaves. Obstructions such as this act like a visor over the top of the window and reduce the existing sky view compared to the ground floor windows on the same façade. Where this happens the BRE Guide recommends investigating the impact of the applicant's proposals without such obstruction over the windows. The Daylight and Sunlight Report has therefore undertaken this additional analysis, which shows that 108 passes without the eave obstruction. This demonstrates that without the visor effect of the immediate eaves this property would pass with the applicant's proposals in place. Furthermore, even with the eaves, the retained VSC values are 25 percent or above, which is generally considered acceptable.

- 110 Rushdene Crescent – The results show that there would be three first floor windows that would be below the BRE guidelines as a result of the proposal. As stated above, without the eaves obstruction the windows pass the VSC test. Furthermore, the test windows retain 23.5 – 24.5 percent VSC, which is considered to be acceptable.

- 112 Rushdene Crescent – there would be two window transgressions at ground floor level. The windows however retain a VSC of 24.5 – 26 percent, which is considered to be acceptable.

- 114 Rushdene Crescent – there would be two window transgressions at ground floor level. The windows retain a VSC of 26 percent, which is considered to be acceptable.

- 116 Rushdene Crescent – there would be three window transgressions at first floor level in terms of the BRE guidelines. As stated above, without the eaves obstruction the

windows pass the VSC test. Furthermore, the test windows retain 23.5 – 24.5 percent VSC, which is considered to be acceptable.

- 118 Rushdene Crescent – there would be two window transgressions in terms of the BRE guidelines at first floor level. As stated above, without the eaves obstruction the windows pass the VSC test. Furthermore, the test windows retain 25 – 26.5 percent VSC, which is considered to be acceptable.
- 120 and 141 Rushdene Crescent – all tested windows pass.
- 143 Rushdene Crescent – there would be one window transgression at ground floor level. However, it is believed that this is likely to be one of two windows supplying this room. Furthermore, the retained VSC value remains above 26 percent, which is considered to be acceptable.
- 1, 2, 29 and 30 Edward Road – all tested windows pass.
- 1 Hartfield Avenue – there would be one window transgression in terms of the BRE guidelines at ground floor level. However, this window is underneath and within the porch detail and is therefore susceptible to adjacent mass. The large main bay window facet also retains a VSC of 29 percent. The impact to this part of the property is therefore considered to be acceptable. All other tested windows pass.
- 3 to 15 Hartfield Avenue – all tested windows pass.
- St Raphael's School – There would be two minor transgressions in terms of the BRE guidelines to two ground floor windows of the retained school grounds. Both windows are beneath a roof canopy / eave detail, which presents a significant obstruction to both windows. It is however clear that this would not have an adverse impact on this area of the school.

The S&D Report also identified a classroom, labelled as building B3, that contains two side windows, both of which would be more significantly affected by the proposal. However, these secondary windows are found within the flank wall of the building and are of a secondary nature (they are not the main windows serving the classrooms). It should also be noted that the daylight distribution within this room is only fractionally affected (by one percent) by the proposal. It is therefore clear that the proposals will not have an adverse impact on this classroom.

Daylight Distribution

Daylighting distribution can be found by plotting what is known as the 'no-sky-line' in each of the main rooms. The rooms tested correspond with the windows tested as part of the above VSC test. A summary of the results is set out below.

- 94 to 112 Rushdene Crescent – all tested rooms pass.

- 114 Rushdene Crescent – there would be two room transgressions in terms of the BRE guidelines at ground floor level caused to this property. However, the retained daylight distribution value is 75 percent of the area within these rooms, which remains high.
- 116 and 118 Rushdene Crescent – all tested rooms pass.
- 120 Rushdene Crescent – there would be one transgression caused to a window at ground floor level. However, the daylight distribution remains at 77 percent, which remains high.
- 141 and 143 Rushdene Crescent – all tested rooms pass.
- 1, 2, 29 and 30 Edward Road – all tested rooms pass.
- 1 to 15 Hartfield Avenue – all tested rooms pass.
- St Raphael's School – all tested rooms pass.

The result of the Daylight and Sunlight assessment shows that whilst there is a daylight distribution impact caused by the proposal, any transgressions are localised and marginal or minor adverse in nature. Where there are transgressions, the retained light value in the room remains high.

Available Sunlight Hours

Habitable rooms in domestic buildings that face within 90 degrees of due south are tested, as are rooms in non-domestic buildings that have a particular requirement for sunlight. The analysis is known as the Annual Probable Sunlight Hours (APSH) analysis. The results of this analysis demonstrates that all of the above windows test would pass the BRE guidance and would therefore unlikely be affected by the proposal in this regard.

Amenity Space

The BRE guidance suggests that at least 50 percent of any garden or open space should receive no less than 2 hours of direct sun on the spring equinox (approximately March 21st). If as a result of new development an existing garden does not receive 2 hours of direct sunlight on the ground on the 21st of March and is less than 0.8 times (one fifth) its former value, the BRE guide considers this a transgression.

In this case the amenity spaces tested are the gardens of neighbouring residential owners and the adjacent playground areas of St Raphael's Primary School. All of the tested amenity spaces would pass the BRE guidelines and therefore unlikely be harmfully affected by the proposal in this regard.

Conclusion

In this case the existing buildings are of a single storey nature and are relatively distant from the boundary and road. Consequently, the existing baseline condition is essentially an open site. Given the lack of any meaningful existing obstructions, where there are transgressions, the results have focussed on both the amount of loss and the retained

values. This is important because on an essentially open site, the introduction of any meaningful development is likely to have a disproportionate impact.

In this case all neighbouring external amenity spaces that we have examined comply with the guidance contained in the BRE Guide. The results also show full compliance with the window sunlight test. There are localised daylight transgressions, but these are localised and it is considered that the retained Vertical Sky Component and Daylight Distribution results are acceptable for this location and in this instance given their limited impact overall on the amenity of occupiers of these properties.

Temporary disruption during construction

It is recognised that the construction phase of the development could result in nuisance to neighbouring amenity for a temporary period. To ensure this nuisance is sufficiently mitigated, any consent at this site would be subject to a condition that requires the applicant to submit, for the approved of the LPA, a detailed construction management plan (CMP). This CMP will require details of mitigations measures regarding noise, dust, vibration and external lighting, as well as highways considerations, all in the interest of protecting neighbouring amenity.

Conclusion

Given all of the above, on balance, it is considered unlikely that the proposed development would result in long term, unacceptably harmful impact on neighbouring amenity or the amenity of the school. While it is recognised that there would likely be some temporary impacts in the short term due to the construction, any consent at this site would be subject to an appropriate condition requiring the applicant to submit a detailed Construction Management Plan (CMP), detailing control measures for dust, vibration, noise, lighting and various highways controls, 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, and to minimise highway and traffic impact during the course of the works. As such, the proposed development would be in accordance with policies D3, D4 and D6 of the London Plan (2021) and policy 7A of the Ealing Development Management DPD (2013).

Environmental health

Noise

Paragraph 185 of the NPPF details how planning decisions should ensure noise amenity is protected as a result of new development.

Policy D14 (Noise) of the London Plan requires noise to be managed by avoiding significant adverse noise impacts on health and quality of life, improving and enhancing the acoustic environment and promoting appropriate soundscapes, separating new noise-sensitive development from major noise sources through the use of distance, screening, layout, orientation, uses and materials and promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

Development Management Policy 7A (Amenity) states that development which in the course of its operations will cause emissions of any sort, including noise, must not erode the amenity of the surrounding uses, take reasonable steps to ameliorate these emissions and must provide all necessary evidence of mitigation that is requested.

A Noise Impact Assessment has been prepared by Hoare Lea. As the proposed development is for residential units, the predicted noise levels of surrounding sources of noise on the intended occupants of the proposed development have been assessed. The Assessment identifies that the general sound climate in the area is dictated predominantly by road traffic on local roads and the A4180. During school breaks, the external areas associated with the school contribute to the general sound climate. The site is also at times exposed to moderate to high noise levels from aircraft passing overhead at RAF Northolt.

The proposed development has been designed to mitigate and minimise the potential adverse impact of noise on health and quality of life which meets the requirements of London Plan Policy D14 (Noise). During construction, mitigation measures will be in place to reduce any impacts.

The assessment concludes that the current Covid-19 pandemic is expected to influence noise levels on site to such a degree that noise surveys on site are considered unsuitable until the influence of the pandemic on measured noise levels is reduced. Therefore, noise levels predictions have been made based on road traffic counts and through comparison with noise levels measured at a comparable location. This assumes, following review of the surrounding area and published aircraft noise contours, that road traffic noise will be dominant.

Based on the predicted noise levels, achieving suitable internal noise levels is expected to be achievable through standard solutions. The proposed development has been designed to mitigate this impact and will achieve suitable internal noise levels that will improve the quality of life residents. Plant noise limits have been provided to inform design of building services plant noise and protect against adverse noise impacts on nearby sensitive receptors.

Contamination

Policy 5.21 (Contaminated Land) of the Ealing Development Management DPD (2013) indicates that contaminated land must be treated in a manner appropriate for its proposed use. Evidence of the appropriateness of the measures to be taken must be submitted as part of the planning application.

Air Quality

The site is located wholly within the London Borough of Ealing's borough-wide Air Quality Management Area since it was implemented in 2000.

Paragraph 174 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by (amongst other things):

“preventing new and existing development from contributing to, being put at unacceptable

risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality..."

London Plan Policy SI 1 (Improving Air Quality) requires development proposals not to lead to further deterioration of existing poor air quality and should not create unacceptable risk of high levels of exposure to poor air quality. Development Management Policy 7A (Amenity) states that development which in the course of its operations will cause emissions of any sort must not erode the amenity of the surrounding uses, take reasonable steps to ameliorate these emissions and must provide all necessary evidence of mitigation that is requested.

An Air Quality and Dust Risk Assessment has been prepared by Hoare Lea and assesses the demolition work on dust soiling and ambient fine particular matter. It identifies appropriate mitigation measures to be implemented, including an Air Quality Dust Management Plan. The assessment concludes that with these standard mitigation measures in place residual impacts are not considered significant. It also confirms the proposed development should be considered in conformity with the principles of the NPPF and Ealing Core Strategy in terms of air quality.

The Councils Pollution Technical (EH) department have reviewed the above assessment and raised no objection in principle, subject to clarifications regarding the operation of the backup generator. A further technical note was submitted in response. It was also recommended that the applicant contribute towards air quality monitoring, which is included in the heads of terms. As such, subject to the requested conditions and financial contributions, the proposed development would be acceptable in terms of its impact on local air quality.

Transport matters and servicing

Policy T4 (Assessing and mitigating transport impacts) of the London Plan (2021) states that development proposals should ensure that development should not adversely affect safety on the transport network. Policy T6 (Car parking) provides that an appropriate balance should be struck between promoting new development and preventing excessive car parking and that in locations with high public transport accessibility, car-free developments should be promoted.

Trip Generation

The submitted Transport Assessment has utilised TRICS data to review the potential trip generation of a re-development of the site for its existing, permitted use as a Community Centre and compared this to the likely trip generation of the proposed scheme.

If redeveloped within its existing permitted use, the site could generate a total of 65 two-way vehicle trips per day, or 3-5 in each peak hour. By all modes it could generate a total of 205 two-way trips across the day or around 10-15 in each hour.

By comparison, the proposed development would likely generate a total of 555 two-way trips by all modes, of which 113 would be by London Underground, 239 by bus, 11 by cycle and 41 on foot. There would be 108 two-way car trips across the day, or 18 in the AM peak and 12 in the PM peak. The proposals therefore represent an increase in vehicle traffic compared to the historic use, with 16 additional trips in the AM peak, 7 in the PM peak and 107 across the day.

To assist in mitigating the potential impact associated with this increase in daily trips to and from the site, the proposed development seeks to undertake a number of significant improvements to the public realm in and around the immediate vicinity of the site which will significantly improve the overall pedestrian and cyclist environment, thus encouraging a shift to more sustainable modes of transport. These include:

- The creation of a new public space in between the proposed residential blocks that will provide a space for people to spend time, sit and relax on their journeys;
- New pedestrian routes linking Hartfield Avenue, St Raphael's School, open park space and Rushdene Crescent increasing pedestrian and cyclist permeability through the site;
- A significant increase in the number of active frontages, both on Hartfield Ave and Rushdene Crescent and within the new public space increasing the natural surveillance associated within the vicinity of the site;
- Increasing the footway width along the western footway of Rushdene Crescent and Northern footway on Hartfield Avenue alongside a comprehensive re-surfacing of the footway with carefully selected and designed materials to align with the new public space; and
- The provision of short stay cycle parking evenly distributed throughout the site to encourage cyclist activity.

As a result, the proposed development will encourage pedestrian and cyclist trips within the vicinity of the site. The proposed development is therefore considered to be supportive of improvement to the local walking and cycling networks and also deliver on the strategic objectives of designing Healthy Streets.

The overall impact of the development upon the London wide transport networks is not considered to be significant, subject to appropriate mitigation through conditions of consent and S106 financial contributions. The proposed development is considered to deliver a positive impact on the local walking and cycling networks given the wider improvements to those networks that will be delivered as part of the scheme.

Access

In terms of access, main access to the site is through Rushdene Crescent and Hartfield Avenue. The primary users will be residents accessing the site. It is anticipated that they will follow typical work patterns, travelling to and from the site on weekdays with a concentration of departure trips during AM peak periods (07:00-10:00) and arrivals during PM peak periods (16:00-19:00).

The primary pedestrian accesses to the proposed site will be from Hartfield Avenue and Rushdene Crescent towards the centre of each block on each respective street front. Other

access points include the cycle parking areas for each block, accessed from between blocks within the site. The proposed new public space has been proposed to increase pedestrian connectivity and permeability through the site creating a new pedestrian route between Rushdene Crescent and St Raphael's School, and between Hartfield Avenue and the open park space at the rear of the site.

Access to the car park is located on Rushdene Crescent which becomes the only intersection point along the healthy street path. This is important to avoid any fragmentation of the public street. The parking zone consists of 27 parking spaces of which 9 are wheelchair accessible.

Servicing and deliveries

The development proposes on-street servicing. The proposed on-street servicing bay would be located on Rushdene Crescent. This is adjacent to the proposed bin store. A second proposed bin store would be serviced from Hartfield Avenue, additional yellow lining is proposed to prevent parking on the junction and to provide a secure stopping location for service vehicles.

Off-street servicing is a preference of both the LPA's and the London Plan. However, in this case off-street servicing is not possible, given the limited height of the car parking area. To ensure that servicing and deliveries of the development do not harmful impact the local transport network, and to ensure that there would not be a loss of amenity as a result, an appropriate condition of consent has been recommended requiring the applicant to submit a detailed servicing and delivery management plan prior to first operation.

Overall, in terms of transport, parking and servicing. The proposals are considered in accord with transport policies in London and LBE planning policy.

Parking

Policy T6 (Car parking) of the London Plan (2021) states that 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, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). For a site with a PTAL rating of 1 (such as this site), the maximum allowance for car parking would be 1.5 spaces per dwelling. This policy also requires all residential car parking spaces to be provide with electric charging facilities. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.

Policy 6.13 (Parking) of the Ealing Development Management DPD (2013) sets the parking standard for the number of marked spaces required for residential development at 10% of total off-street parking provision and the number of enlarged but unmarked spaces for residential development as 1 space per 10 dwellings.

The proposed development is designed to have a parking space ratio of 0.32. The scheme would provide 27 car parking spaces, of which 9 will be reserved disabled parking from the outset. As per the London Plan requirement, 20% of spaces (13 spaces) would be EV

charging enabled from the outset with 80% passive provision. The only vehicle access proposed is from Rushdene Crescent which will provide access through to a central internal parking court with play space above. Car parking is provided in the centre of the site, in the gap between the northern mansion block to the east and the mews housing to the west. This results in parked vehicles having no visibility to the street, apart from its entrance, allowing the street frontages to be active with the provision of homes. The carpark is hidden from residential buildings by the provision of a playspace deck, which fully covers the parking area, providing over 600sqm of usable children's playspace for residents.

The development has been designed to meet its own parking needs within the site (27 spaces, of which 9 will be reserved disabled parking). As set out in the Transport Assessment, the site could generate ownership of up to 40 vehicles. A total of 27 vehicles will be contained within the site and the parking provision proposed. The potential overspill would be a total of 13 vehicles. A parking beat survey has been undertaken and is set out within the Transport Assessment this demonstrates that there are 38 spaces available overnight at the period of highest demand, below the 85% capacity threshold. The site will also be managed by a Travel Plan and will seek to reduce car ownership as part of its targets. In addition, the proposal seeks to encourage sustainable modes of transport through cycle parking provision and an improved pedestrian and cyclist experience around the site.

In order to ensure that any impacts are sufficiently mitigated, any future consent at this site would be subject to a S106 legal agreement, requiring financial contributions to put towards mitigation measures, including a review and potential implementation of a controlled parking zone (CPZ) near the development, along with a legal obligation restricting all future occupants from applying for parking permits within this CPZ.

The proposed car parking provision is therefore considered to be in accordance with the Local Plan and national policy requirements.

Cycle Parking

London Plan policy T5 (Cycling) requires development proposals to remove barriers to cycling and create a healthy environment in which people choose to cycle. This policy also requires the provision of appropriate levels of cycle parking on site, which should be fit for purpose, secure and well-located.

In accordance with the London Plan's cycle parking requirements, the development will provide a total of 165 cycle parking spaces within 2 secure cycle stores, of which 8 are on wider-spaced Sheffield Stands suitable for adapted cycles. There are 4 Sheffield stands externally at the cul-de-sac end of Rushdene Crescent, providing 8 short-stay visitor spaces, in excess of the requirement. cycle spaces.

The primary access for cyclists will be from Hartfield Avenue and Rushdene Crescent. The long stay cycle parking will be accommodated in 3 stores distributed across the two blocks, with a single store for the smaller southern building and 2 stores for the larger northern building. The southern building would be accessed from Rushdene Crescent via the new public space. The long stay cycle parking for the north east building will be accessed similarly for the southern store and more directly from Rushdene Crescent via new

landscaping for the northern store. Short stay cycle parking is distributed across the ground floor within the public realm to provide an even distribution of spaces for visitors.

A healthy street is also a low carbon street. This aligns with Ealing's low carbon transport objectives which requires all roads to have high quality cycle networks, adaptations that encourage the use of active transport modes and a 20mph speed limit by 2021. A cycle route is proposed around the site which will be also incorporated in the layout, with planting along the edge providing a safe buffer for the pedestrians.

Other Matters

It is recognised that construction vehicles could potentially cause temporary disruption on local roads. As such, in order to mitigate these impacts, an appropriate condition has been recommended to secure a detailed Construction Management Plan 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 and to ensure appropriate mitigation measures regarding highway and site safety (See: Appendix A).

Given all of the above, the proposal is considered to comply with the aims and objectives of policies.

Refuse And Recycling

Standard 3.5.1 of the London Supplementary Planning Guidance November 2012 provides that '*refuse stores should be accessible to all residents...and should satisfy local requirements for waste collection*'. London Plan policy S18 'Waste capacity and net waste self-sufficiency' requires the provision of suitable waste and recycling storage facilities in all new developments. The development has been designed to accommodate refuse generated by the residential units according to LBE's waste guidance and designed to maximise the opportunities for recycling.

There are two large communally accessible bins stores proposed, conveniently located adjacent to the two main mansion block access cores allowing for direct internal level access for residents. Each bin store also has direct level external access via double doors for refuse collection from the street. A layby in both Rushdene Crescent near the bin store for the North Block and in Hartfield Avenue near the South Block bin store are proposed for service vehicles. The townhouses and Mews Houses share these refuse stores and depending on their location, would take their refuse to the closest store.

The proposed Waste Strategy is in accordance with the Ealing Waste Management Guidelines and BS 5906:2005. Provision has been made for 50% refuse and 50% recycling waste, as well as a bulk storage area for larger communal waste items. 12 bins would be provided in the northern block bin store and 8 would be provided in the southern block bin store.

This arrangement is considered acceptable, and the proposal is therefore considered to comply with policy S18 of the London Plan (2021).

Energy and sustainability

In April 2019 Ealing Council passed a motion declaring a Climate Emergency with a commitment to draw up and implement policies that will achieve a target of net zero emissions by 2030.

The provision of sustainable development is a key principle of the National Planning Policy Framework which requires the planning process to support the transition to a low carbon future. Policies SI2 and SI3 of the London Plan require submission of energy and sustainability strategies showing how the heating and cooling requirements of the development have been selected in accordance with the Mayor's energy hierarchy.

In particular, policy SI2 that requires new major development to meet zero-carbon standards with at least a 35% CO2 reduction beyond Building Regulations Part L 2013 (or any later version) being achieved onsite. Any shortfall will be met through a S106 carbon offset contribution. Policy SI2 adds a fourth layer to the energy hierarchy which requires development to monitor, verify, and report on energy performance. This policy is reinforced by Ealing Council's 2013 DPD policy E5.2.3 which requires the post-construction monitoring of renewable/low-carbon energy equipment. In addition, section 10.2 of the GLA (2020) Energy Assessment Guidance expects all major development proposals to maximise on-site renewable energy generation regardless of whether a 35% target has already been met.

London Plan policy SI3 (Energy Infrastructure) recognises that combined heat and power (CHP) may have negative effects on London's air quality. The policy also recognises that because the carbon intensity of grid electricity is steadily dropping due to the increasing use of marine wind turbines, electric air-source-heat-pumps are a better carbon reduction option than gas fired CHP.

Policy 5.2 (Minimising Carbon Dioxide Emissions) of the Ealing Development Management DPD (2013) states that residential development in Ealing must achieve Code for Sustainable Homes Level 4 as a minimum.

The Council have reviewed the submitted Energy Strategy prepared by Hoare Lea in January 2022 (v1) and is generally supportive of the proposed energy strategy, subject to the inclusion of PV arrays on two mews houses. The Energy Strategy has been assessed against the draft SAP10 benchmark and follows the standard energy hierarchy of "Lean, Clean, Green" as required by London Plan policy SI2 & SI3, and Ealing DPD policy 5.2.

An Overheating analysis with proposed mitigation measures has been carried out. The analysis was assessed against CIBSE TM59 and the DSY1 (average summer) weather data, as well as the more intense (but non-mandatory) DSY2 (2003) and DSY3 (1976) data files. All rooms pass the DSY1 and DSY2 modelling, with a creditable 89% against DSY3 (long warm periods).

The Council confirms that there is no available “Clean” district heat network (DHN), and therefore acknowledge that connection to a DHN is not possible.

The strategy proposes a communal site-wide low-temperature Air Source Heat Pump distribution loop with dwelling heat exchangers (HIU) feeding underfloor heating and/or panel radiators. The combined ASHP efficiency (SCOP) will be around 3.2 mitigating 49.27 t/CO₂. Also proposed are two PV arrays on the roof of the North and South blocks with a combined capacity of (approximately) 30 kWp (mitigating 4.83 t/CO₂).

However, PV has not been proposed for the townhouses which is contrary to clause 10.2 of the GLA Energy Assessment guidance (2020) which; “*..expects all major development proposals to maximise on-site renewable energy generation. This is regardless of whether the 35% on-site target has already been reached through earlier stages of the energy hierarchy. In particular, solar PV should be maximised on roof spaces.*” This requirement has therefore been included in the proposed energy conditions.

At the current design stage, the overall site-wide CO₂ emissions would be cut by at least 58.32%, with 10.44% reduction through “Lean” efficiency measures and 47.88% through “Green” renewable energy. There is a shortfall of 1,413 tonnes CO₂ (over 30 years) in the zero-carbon target. This will be mitigated through an “offset” S106 payment at £95 per tonne to the Council of £134,235.

If after three years of in-situ monitoring the renewable/low-carbon 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. This requirement will be secured through the S106 obligations.

The London Plan (policy S12) 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 order to confirm full compliance with the relevant Mayor’s and Ealing Council energy policies the Council will require the developer to pay the Index Linked total sum of £9,464 (inclusive of VAT) as a contribution towards the provision (by Energence Ltd) of the post-construction energy equipment monitoring, comprising:

- a) £4,788 for the automated energy monitoring web-platform and associated officer/consultant time, and
- b) £4,676 for the cost of the energy monitoring equipment and data processing (4 years).

Contribution a) is payable within 30 days of the completion of the Legal Agreement, and contribution b) within 30 days of the commencement of construction.

The S106 contribution may include a contingency, all, or part of which will be returned to the applicant (or their relevant contractor) once the energy equipment has been confirmed as fully operational for three years without any additional expense to the Council or its contractors. Any additional monitoring equipment costs are the responsibility of the Developer.

The applicant has also submitted a Circular Economy statement, which commits the development to meeting the London Plan target of diverting 95% of construction waste from landfill, putting 95% of excavation materials to beneficial on-site use, and diverting 65% of Operational Waste from landfill by 2030.

Given all of the above and subject to appropriate conditions of consent and S106 obligations and contributions recommended, the proposal is considered to be in accordance with polices SI2 and SI3 of the London Plan (2021) and policy 5.2 of the Ealing Development Management DPD (2013).

Flood risk and surface water management

The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk but, where development is necessary, making it safe without increasing flood risk elsewhere.

Policy SI12 (Flood Risk Management) of the London Plan (2021) states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

Policy 5.12 (Flood Risk Management) of the Ealing Development Management DPD (2013) states that all development, including that on land that is not part of a defined floodplain, must ensure that it is not vulnerable to surface water, sewer and groundwater flooding.

A Flood Risk Assessment has been prepared by Graphic Structures as part of this application. The Environment Agency Flood Map for Planning indicates that the site is located entirely in Flood Zone 1, which is land assessed as having the lowest probability of river or sea flooding. There are areas within Flood Zones 2 and 3 located approximately 900m west of the application site.

The site has been assessed for surface water flooding and is overall in an area of very low risk with a few small areas in the centre of site at low risk. To minimise any risk from this source of flooding, the site levels will be designed to route any surface water away from building entrances for the event of surface water flooding or a local drainage system failure. This will increase the buildings resilience to flooding from overland flows.

The infiltration testing carried out during the site investigation as part of the Flood Risk Assessment, yielded very poor infiltration rates meaning total disposal of surface water via infiltration is unfeasible for the development. It is not deemed practical to make a new

connection to any nearby watercourses. Therefore, a connection to the Thames Water 900mm Surface Water sewer running to West of the site is deemed to be the most feasible method of surface water disposal. Blue roofs, rain gardens and underground attenuation have been identified as the most appropriate forms of SuDS for the development.

The Flood Risk Assessment concludes that the risk of flooding from all sources has been deemed low and therefore the development is in compliance with local planning policy and the NPPF. There are no surface water bodies in the immediate vicinity of the site. It is therefore proposed to drain surface water from the development to a surface water sewer which is owned and maintained by Thames Water.

A Sustainable Urban Drainage Strategy has been prepared by Graphic Structures as part of this application. Solutions for Sustainable Drainage Systems will be proposed across the site. Chains of Green SuDS will be featuring in the rain gardens edging the eastern boundary along Rushdene Crescent as well as in the green strip located along the western boundary. Grey SuDS will be designed for the hardscaped areas surrounding the South Building. Permeable paving will be used at given locations to allow for the SuDS to work correctly, together with geo-cells system underground for water collection.

Run-off water will be partly absorbed by the gardens planting, partly infiltrated in the soil, but also stored locally to be routed towards the collection points and released into drainage network at the required flow rates. In the public space to the North a mix between Green and Grey SuDS could redirect the water to selected points in the SINC area.

Given the above, it is considered that the proposals are in line with flood risk and drainage planning policies set out in London and Ealing planning policies.

Fire Safety

Policy D12 (Fire Safety) of the London Plan requires all development proposals to achieve the highest standards of fire safety.

Large schemes may require a number of different consents before they can be built. For example, Building Control approval needs to be obtained to certify that developments and alterations meet building regulations. Highways consent will be required for alterations to roads and footpaths; and various licenses may be required for public houses, restaurants and elements of a scheme that constitute a 'house in multi-occupation'.

The planning system allows assessment of a number of interrelated aspects of development when planning applications are submitted to the Council. The proposed materials to be used may be approved under a planning permission based on the details submitted as part of the planning application, or they may be subject to a condition that requires such details to be submitted and approved prior to the commencement of the development. Whichever the case, planning officers' appraisal of materials is focused on the visual impact of such materials in relation to the design of the overall scheme itself, the character of the local area or indeed on the amenities of local residents.

The technical aspects of the materials to be used in any development, in relation to fire safety, are considered under the Building Act (1984) and specifically the Building Regulations (2010). These require minimum standards for any development, although the standards will vary between residential and commercial uses, and in relation to new build and change of use/conversions. The regulations cover a range of areas including structure and fire safety.

Any person or organisation carrying out development can appoint either the Council's Building Control Service or a Private Approved Inspector to act as the Building Control Body (BCB), to ensure that the requirements of the Building Regulations are met. The BCB would examine drawings for the proposed works and carry out site inspection during the course of the work to ensure that the works are carried out correctly. On completion the BCB will issue a Completion Certificate to confirm that the works comply with the requirements of the Building Regulations. In relation to fire safety in high rise residential developments, some of the key measures include protected escape stairways, smoke detection within flats, emergency lighting to commons areas, cavity barriers/fire stopping and the use of sprinklers and wet/dry risers where appropriate.

Policy D12 of the London Plan (2021) states that proposals must be accompanied by a fire statement. This needs to be prepared by a suitably qualified third-party assessor, demonstrating how the development would achieve the highest standards of fire safety and ensure that they: are designed to incorporate appropriate features which reduce the risk to life in the event of a fire; are constructed in an appropriate way to minimise the risk of fire spread; provide suitable and convenient means of escape for all building users; adopt a robust strategy for evacuation which all building users can have confidence in; and provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

The applicant has submitted a Fire Safety Statement prepared by Hoare Lea. This Fire Safety Statement has been prepared to outline the approach and provisions relating to fire safety for the proposed development in order to demonstrate compliance with the London Plan Policy D5 and D12.

This statement demonstrates that the proposals have considered fire safety at the earliest stage, and the further development of the fire strategy will be based upon these principles. The fire strategy will be further developed for submission to the Approving Authority at the appropriate time and will meet the functional requirements of the Building Regulations 2010, taking recommendations from BS 9991:2015 and the requirements of Policy D5 and D12 of The London Plan.

The proposed framework Fire Strategy is considered sufficient for a scheme of this nature in terms of planning considerations. In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety. Therefore, a Fire Statement requiring further detail has been recommended by way of condition (See: Appendix A).

THE MAYOR'S COMMUNITY INFRASTRUCTURE LEVY (CIL)

The Mayoral Community Infrastructure Levy 2 (MCIL2) was adopted on 1st April 2019. This has introduced a charging system within Ealing of £60 per sqm (indexed amount) of gross internal floor area to be paid to the GLA for applications decided on or after the above date. MCIL2 will be used to fund Crossrail 1 (the Elizabeth Line) and Crossrail 2 and supersedes the previous MCIL1 charging schedule. The proposal would therefore be CIL liable for approximately £450,420. However, as the proposed scheme would provide 100% affordable housing, the developer would be able to apply for social housing relief from MCIL2. The final CIL amount payable will be calculated by the Councils CIL Officer.

CONCLUSION

For all the reasons outlined in this report the proposal on balance represents a good example of optimisation, balancing policy, amenity and site constraints, whilst maximising the delivery of affordable housing. It is recommended that it be resolved to grant planning permission, subject to planning obligations and conditions to mitigate any potential adverse impacts of the proposal.

Human Rights Act

In making your decision, you should be aware of and take account of 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 a proportionate response to the submitted application based on the considerations set out in this report.

Public Sector Equality Duty (which applies to all Council decisions)

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

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

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

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

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

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

APPENDIX A: CONDITIONS AND INFORMATIVES

CONDITIONS

1. Time Limit

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

Reason: In order to ensure that this allocated site is brought forward for development as soon as practicable and to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2. Approved Plans

The development hereby approved shall be carried out in accordance with drawing title number(s): NHG-HOK-1X-ZZ-DR-A-0005/ Rev P05 - PROPOSED LAND SWAP PLAN; NHG-HOK-1X-ZZ-DR-A-0110/ Rev P04 - BLOCK PLAN; NHG-HOK-1X-ZZ-DR-A-0111/ Rev P04 - DEMOLITION PLAN; NHG-HOK-ZZ-ZZ-DR-A-0040/ Rev P04 - WIDER MASTERPLAN - USES AT GROUND FLOOR; NHG-HOK-ZZ-ZZ-DR-A-0041/ Rev P04 - WIDER MASTERPLAN – HEIGHTS; NHG-HOK-ZZ-ZZ-DR-A-0042/ Rev P04 (WIDER MASTERPLAN - FIGURE GROUND); NHG-HOK-ZZ-ZZ-DR-A-0043/ Rev P04 (WIDER MASTERPLAN – SOCIAL INFRASTRUCTURE); NHG-HOK-1X-RF-DR-A-0115/ Rev P02 - PROPOSED SITE PLAN; NHG-HOK-1X-GF-DR-A-1001/ Rev P05 - GA PLAN - GROUND FLOOR; NHG-HOK-1X-01-DR-A-1002/ Rev P05 - GA PLAN - LEVEL 1; NHG-HOK-1X-02-DR-A-1003/ Rev P05 - GA PLAN - LEVEL 2; NHG-HOK-1X-03-DR-A-1004/ Rev P05 - GA PLAN - LEVEL 3; NHG-HOK-1X-04-DR-A-1005/ Rev P05 - GA PLAN - LEVEL 4; NHG-HOK-1X-RF-DR-A-1006/ Rev P05 - GA PLAN - ROOF PLAN; NHG-HOK-1X-ZZ-DR-A-3001/ Rev P05 NORTH & SOUTH; NHG-HOK-1X-ZZ-DR-A-3002/ Rev P05 - EAST ELEVATION; NHG-HOK-1X-ZZ-DR-A-3003/ Rev P05 - WEST ELEVATION; NHG-HOK-1X-ZZ-DR-A-3004/ Rev P03 - SOUTH BUILDING NORTH ELEVATION; NHG-HOK-1X-ZZ-DR-A-3018/ Rev P05 - SECTION A-A; NHG-HOK-1X-ZZ-DR-A-3019/ Rev P03 - SECTION B-B; NHG-HOK-1X-ZZ-DR-A-3020/ Rev P02 - SECTION C-C; NHG-HOK-1X-ZZ-DR-A-4001/ Rev P05 - UNIT PLAN - 1N-1S - 1B2P - TYPE A; NHG-HOK-1X-ZZ-DR-A-4002/ Rev P04 - UNIT PLAN - 1N-1S - 1B2P - TYPE B; NHG-HOK-1S-ZZ-DR-A-4003/ Rev P03 - UNIT PLAN - 1S - 2B3P - TYPE A; NHG-HOK-1N-ZZ-DR-A-4004/ Rev P04 - UNIT PLAN - 1N - 2B4P - TYPE A; NHG-HOK-1S-ZZ-DR-A-4005/ Rev P03 - UNIT PLAN - 1S - 2B4P - TYPE C; NHG-HOK-1S-ZZ-DR-A-4006/ Rev P03 - UNIT PLAN - 1S - 2B4P - WCA TYPE A; NHG-HOK-1S-GF-DR-A-4007/ Rev P03 - UNIT PLAN - 1S - 3B5P - TYPE A – GF; NHG-HOK-1S-01-DR-A-4008/ Rev P03 - UNIT PLAN - 1S - 3B5P - TYPE A - L1; NHG-HOK-1M-GF-DR-A-4009/ Rev P04 - UNIT PLAN - 1M - 4B6P - TYPE A – GF; NHG-HOK-1M-01-DR-A-4010/ Rev P04 - UNIT PLAN - 1M - 4B6P - TYPE A - L1; NHG-HOK-1M-02-DR-A-4011/ Rev P04 - UNIT

PLAN - 1M - 4B6P - TYPE A - L2; NHG-HOK-1X-ZZ-DR-A-6000/ Rev P05 - FULL AXONOMETRIC; NHG-HOK-1M-ZZ-DR-A-6001/ Rev P05 - MEWS FAMILY HOUSING; AXONOMETRIC; NHG-HOK-1N-ZZ-DR-A-6002/ Rev P05 - NORTH BUILDING; AXONOMETRIC; NHG-HOK-1S-ZZ-DR-A-6003/ Rev P05 - SOUTH BUILDING; AXONOMETRIC; NHG-HOK-1X-GF-DR-L-1001 - LANDSCAPE GA SITE PLAN GF; NHG-HOK-1X-01-DR-L-1002/ Rev P05 - LANDSCAPE - GA SITE PLAN - LEVEL 1; NHG-HOK-1X-ZZ-DR-L-7001/ Rev P04 - LANDSCAPE - SITE SECTIONS; NHG-HOK-1X-XX-DR-L-9001/ Rev P03 - LANDSCAPE - SOFT LANDSCAPE DETAILS; NHG-HOK-1X-GF-DR-L-4001/ Rev P03 - LANDSCAPE - TREE RETENTION-REMOVAL PLAN; NHG-HOK-1X-GF-DR-L-4002/ Rev P03 - LANDSCAPE - TREE PLANTING PLAN; NHG-HOK-1X-XX-SH-A-0100 - UNIT SUMMARY & AREA SCHEDULE; NHG-HOK-1X-XX-SH-A-0101 - ACCOMMODATION SCHEDULE; NHG-HOK-1X-XX-SH-A-0102 - CYCLE SCHEDULE; NHG-HOK-1X-XX-SH-A-0103 - WASTE SCHEDULE; NHG-HOK-1X-GF-DR-A-0113/ Rev P04 - ACCESS STRATEGY; NHG-HOK-1X-GF-DR-A-0114/ Rev P04 - REFUSE STRATEGY

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

3. Hard and Soft Landscaping

Details of biodiverse landscaping, boundary treatments, tree planting, green and brown roofs, and a detailed Landscaping Management Plan for a minimum period of 5 years from the implementation of final planting shall be submitted to and approved in writing by the local planning authority prior to the first occupation or use of the flats hereby approved. The development shall be implemented only in accordance with these approved details and retained thereafter.

Any planting that is part of the approved scheme that within a period of five years after planting is removed, dies or becomes seriously damaged or diseased, shall be replaced in the next planting season. All planting shall be replaced with others of a similar size and species and in the same position and shall be retained thereafter.

Reason: To ensure a satisfactory standard of appearance and setting for the development and to ensure that the proposed development enhances biodiversity and the visual amenity of the locality, in accordance with policies 5.10, 7.4 and 7B of the Ealing Development Management Development Plan Document (2013), policies S4 and G5 of the London Plan (2021) and the Mayor's Supplementary Planning Guidance on Play and Informal Recreation; the London Environment Strategy (2018) and the National Planning Policy Framework (2021).

4. Play equipment

Details of children's play areas including safety surfacing and a Management Plan shall be submitted to and approved in writing by the local planning authority and implemented prior to the first occupation of the development hereby approved. The development shall be implemented only in accordance with these approved details and retained thereafter.

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

5. Details of Materials - Building

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 before any part of the super structure is commenced and this condition shall apply notwithstanding any indications as to these matters which have been given in this application. The development shall be implemented only in accordance with these approved details.

Reason: To ensure that the materials harmonise with the surroundings, in accordance with policies 1.1 & 1.2 of the Ealing Core Strategy (2012), policies 7.4 & 7B of the Ealing Development Management Development Plan Document (2013), policies D3 and D4 London Plan (2021) the National Planning Policy Framework (2021).

6. Construction Management Plan

Prior to commencement of the development hereby approved, a detailed Demolition Method Statement and a Construction Management Plan shall be submitted to and approved in writing by the Council. Details shall include:

- a) 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;
 - audit of existing condition of roads and footways to ensure that they be restored if damaged during construction;
 - hours of work and all associated activities audible beyond the site boundary restricted to 0800-1800hrs Mondays to Fridays, 0800 -1300 Saturdays;
 - neighbour liaison, notifications to interested parties;
 - restriction of hours of work and all associated activities audible beyond the site boundary to 0800-1800hrs Mondays to Fridays and 0800 -1300 hrs on Saturdays;
 - public display of contact details including accessible phone numbers for persons responsible for the site works for the duration of the works.
- b) Details related to:
 - The construction lorry route from the main distributor roads and the number of constructions related vehicles, which would be travelling to the application site. A drawing showing signing for the construction vehicles is also required;
 - Key dates of various stages and all the emergency contacts during construction;
 - Abnormal load delivery vehicle routes and dates of these deliveries; and

- Swept path envelopes for construction lorries.

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, and to minimise highway and traffic impact during the course of the 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 T7 and SI1 of the London Plan(2021); and National Planning Policy Framework (2021).

7. 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 shall 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 and Site Clearance 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 provide direct access to monitoring data at all times 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 at all times will be 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: To promote sustainable design and construction and to reduce emissions from the demolition and construction of buildings in accordance with London Plan policy SI1; policy 7A of the Ealing Development Management DPD (2013) and The Control of Dust and Emissions from Construction and Demolition SPG (GLA).

8. 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 policies D14 and SI1 of the London Plan (2021); and National Planning Policy Framework (2021).

9. Piling Method Statement

No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface 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: To safeguard nearby underground sewerage utility infrastructure.

10. Protection Of Existing Trees/Hedgerows and Planting Locations (Demolition & Construction):

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

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

- Full survey of all trees on site and those within influencing distance on adjacent sites in accordance with BS5837*, with tree works proposals. All trees must be plotted on a site plan**, clearly and accurately depicting trunk locations, root protection areas and canopy spreads.
- A plan** detailing all trees and hedgerows planned for retention and removal.
- A schedule of tree works for all the retained trees specifying pruning and other remedial or preventative work, whether for physiological, hazard abatement, aesthetic or operational reasons. All tree works shall be carried out in accordance with BS 3998.
- Soil assessments/survey
- Timing and phasing of works
- Site specific demolition and hard surface removal specifications
- Site specific construction specifications (e.g. in connection with foundations, bridging, water features, surfacing)
- Access arrangements and car parking
- Level changes
- Landscaping proposals
- A Tree protection plan** in accordance with BS5837* detailing all methods of protection, including but not restricted to: locations of construction exclusion zones, root protection areas, fit for purpose fencing and ground protection, service routes,

works access space, material/machinery/waste storage and permanent & temporary hard surfaces.

- Soil remediation plans, where unauthorised access has damaged root protection areas in the construction exclusion zones.
- Details of the arboricultural supervision schedule.

All tree protection methods detailed in the approved Arboricultural Method Statement shall not be moved or removed, temporarily or otherwise, until all works including external works have been completed and all equipment, machinery and surplus materials have been removed from the site, unless the prior approval of the Local Planning Authority has first been sought and obtained.

*Using the most recent revision the of the Standard

** Plans must be of a minimum scale of 1:200 (unless otherwise agreed by the Local Planning Authority)

Reason: To ensure appropriate tree protection in the interests of protecting the visual amenity of the area, contributing to the quality and character of London's environment, air quality and adapting to and mitigating climate change in accordance with policies D8, G1, G5, G7, SI1, and SI2 of the London Plan, policy 5.10 of Ealing's Development Management DPD and Ealing's SPG 9 - Trees and Development Guidelines.

11. Tree Monitoring Plan

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

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

A tree monitoring program to include:

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

(b) Within three months of first use of the development hereby approved, a report containing the following details shall be submitted to and approved by the Local Planning Authority:

- Results of each site visit by the lead arboriculturist with photos attached.

- Assessment of the retained and planted trees including any necessary remedial action as a result of damage incurred during construction.

Reason: To ensure appropriate tree protection in the interests of protecting the visual amenity of the area, contributing to the quality and character of London's environment, air quality and adapting to and mitigating climate change in accordance with policies D8, G1, G5, G7, SI1, and SI2 of the London Plan, policy 5.10 of Ealing's Development Management DPD and Ealing's SPG 9 - Trees and Development Guidelines.

12. Tree Planting and Soil Rooting Volume Condition

A suitable scheme of proposed tree planting and pits shall be submitted to and approved by the Local Planning Authority prior to the first use of the development hereby approved. No operations shall commence on site in connection with the development hereby approved until a suitable scheme of proposed tree planting and tree pits have been submitted to and approved by the Local Planning Authority. The scheme shall include the following comprehensive details of all trees to be planted:

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

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

Any trees which die, are removed, uprooted, significantly damaged, become diseased or malformed within five years from the completion of planting, must be replaced during the nearest planting season (1st October to 31st March inclusive) with a tree/s of the same size, species and quality as previously approved.

Reason: To ensure appropriate tree protection in the interests of protecting the visual amenity of the area, contributing to the quality and character of London's environment, air quality and adapting to and mitigating climate change in accordance with policies D8, G1, G5, G7, SI1, and SI2 of the London Plan, policy 5.10 of Ealing's Development Management DPD and Ealing's SPG 9 - Trees and Development Guidelines.

13. Existing Tree/Shrub/Hedge Retention

No trees, shrubs or hedges within the site which are shown to be retained on the approved plans (Plan/Drawing:) shall be felled, uprooted, damaged or destroyed, cut back in any way or removed without previous written consent of the Local Planning Authority.

Any shrubs or hedges removed without consent or dying or being severely damaged or becoming seriously diseased within 5 years from the completion of the development hereby permitted shall be replaced with shrubs or hedge plants or similar species capable of achieving a comparable size unless the Local Planning Authority gives written consent to any variation.

If a tree marked on the tree report to be retained is removed without consent, or dying, or being severely damaged, or becoming seriously diseased (crown more than 50% sparse), within 5 years from the start of work on the development hereby permitted, a replacement tree shall be planted on the site or surrounding area reflecting the CAVAT value of the tree, or a proportion of its value reflecting the damage. This penalty shall be sought, unless the Local Planning Authority has given written consent to any variation.

Reason: To secure the protection throughout the time that development is being carried out, of trees, shrubs and hedges growing within the site which are of important amenity value to the local landscape, in accordance with policies D8, G1, G5, and G7 of the London Plan, policy 5.10 of Ealing's Development Management DPD and Ealing's SPG 9 - Trees and Development Guidelines.

14. Ecological Assessment

The development hereby approved shall be carried out in accordance with the recommendations set out in the submitted Ecological Assessment prepared by The Environmental Partnership dated February 2022 (Ref: 9272.002).

Reason: To ensure that indirect impacts on non-statutory designated sites within the vicinity of the site, and retained habitats within and adjacent to the site, are reduced to a reasonable minimum, in accordance with policies G1, G6, G7 and G9 of the London Plan (2021).

15. Fire Statement

Prior to the commencement of the superstructure works, a Fire Statement shall be submitted for approval, which shall include details of:

- i. appropriate features which reduce the risk to life in the event of a fire;
- ii. appropriate way to minimise the risk of fire spread;
- iii. provide suitable and convenient means of escape for all building users;
- iv. a robust strategy for evacuation;
- v. suitable access and equipment for firefighting which is appropriate for the size; and use of the development.

In addition, the statement shall provide details of how the development proposal will function in terms of:

- i. the building's construction: methods, products and materials used, the means of escape for all building users: stair cores, escape for building users who are disabled or require level access, and the associated management plan approach
- ii. access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
- iii. how provision will be made within the site to enable fire appliances to gain access to the building.

Reason: In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety, in accordance with policy D12 of the London Plan (2021).

16. Transport/commercial/industrial/cultural noise sources

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

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise, in accordance with policies 1.1 and 1.2 of the Ealing Development (Core) Strategy (2012), policies 7A & 7B of the Ealing Development Management Development Plan Document (2013), policies D6 and D14 of the London Plan (2021), Ealing's SPG10 and the National Planning Policy Framework (2021).

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

The individual and combined external sound level emitted from plant, machinery or equipment at the development site shall be lower than the lowest existing background sound level by at least 10dBA, as measured at/ calculated to the nearest and most affected noise sensitive premises at the development site and at surrounding premises. The assessment shall be made in accordance with BS4142:2014, with all machinery operating together at maximum capacity.

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise, in accordance with policies 1.1 and 1.2 of the Ealing Development (Core) Strategy (2012), policies 7A & 7B of the Ealing Development Management Development

Plan Document (2013), policies D6 and D14 of the London Plan (2021), Ealing's SPG10 and the National Planning Policy Framework (2021)

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

Prior to use, machinery, plant and equipment/ extraction/ ventilation system and ducting at the development site 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 policies 1.1 and 1.2 of the Ealing Development (Core) Strategy (2012), policies 7A & 7B of the Ealing Development Management Development Plan Document (2013), policies D6 and D14 of the London Plan (2021), Ealing's SPG10 and the National Planning Policy Framework (2021)

19. Separation of noise sensitive rooms in neighbouring flats

Prior to commencement of the superstructure of the development hereby approved, 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, kitchen/living/dining/bathroom above/below/adjoining bedroom of separate dwelling. 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 policies 1.1 and 1.2 of the Ealing Development (Core) Strategy (2012), policies 7A & 7B of the Ealing Development Management Development Plan Document (2013), policies D6 and D14 of the London Plan (2021), Ealing's SPG10 and the National Planning Policy Framework (2021)

20. Separation of communal uses and facilities from dwellings

Prior to commencement of the superstructure of the development hereby approved, details shall be submitted to the Council for approval in writing, of enhanced sound insulation of at least 10dB above the Building Regulations value for residential use of the floor/ceiling/walls separating communal areas and mechanical installations from dwellings. Where noise emissions include characteristic features, the Noise Rating level shall not exceed NR20 Leq 5mins (octaves) inside habitable rooms. Details of mitigation measures shall include the installation method, materials of separating structures and the resulting sound insulation value and internal sound/rating 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 policies 1.1 and 1.2 of the Ealing Development (Core) Strategy (2012), policies 7A & 7B of the Ealing Development Management Development Plan Document (2013), policies D6 and D14 of the London Plan (2021), Ealing's SPG10 and the National Planning Policy Framework (2021)

21. Sound Insulation of Lifts

Prior to commencement of the superstructure of the development hereby approved, details shall be submitted to the Council for approval in writing, of enhanced sound insulation of lifts and lift shafts, in accordance with noise limits specified in Table 5 BS8233:2014. Where noise emissions include characteristic features, the Noise Rating level shall not exceed NR20 Leq 5mins inside a habitable room. Details shall include mitigation measures and the resulting sound insulation value and internal sound/rating level. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise, in accordance with policies 1.1 and 1.2 of the Ealing Development (Core) Strategy (2012), policies 7A & 7B of the Ealing Development Management Development Plan Document (2013), policies D6 and D14 of the London Plan (2021), Ealing's SPG10 and the National Planning Policy Framework (2021)

22. Deliveries and Servicing Management

Notwithstanding the submitted Transport Statement, a detailed Delivery and Servicing Management Plan shall be submitted for approval prior to first occupation of any part of the development hereby approved. The development shall be carried out in accordance with the approved Delivery and Servicing Management Plan permanently thereafter, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by noise, and that resulting servicing arrangements are satisfactory in terms of their impact on highway safety and the free-flow of traffic in accordance with policies T2 and T7 of the London Plan (2021).

23. Travel Plan

Notwithstanding the submitted Framework Travel Plan, prior to first occupation of the development hereby approved, a revised and detailed Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall be prepared in accordance with the Transport for London Travel Plan Guidance and 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.

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, SI1 and SI2 of the London Plan (2021); and Ealing's Sustainable Transport for New Development SPG.

24. Electric charging points

Of the twenty-seven (27) car parking spaces proposed, at least 6 of the spaces shall have an active electric vehicle charge point. The remaining spaces shall have passive provision. The proposed car club bay shall have an active electric vehicle charge point.

Reason: To encourage low carbon emission transport and to support sustainable modes of transport and to not exacerbate existing poor air quality conditions in accordance with policies SI1 and T6.1 of the London Plan (2021)

25. Cycle Parking

At least 165 long stay secure and sheltered cycle parking spaces and 8 short stay cycle parking spaces in total shall be provided as per hereby approved plans listed in Condition 2 and in full accordance with the standards and specifications of the London Cycle Design Standards. This includes 5% of the proposed spaces being wider spaces for adopted cycle/cargo bikes. All of the approved cycle parking shall be brought into use prior to first occupation of the development and be retained in good working order for the life of the development.

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.

26. Car Parking and Cycle Parking Management Plan

Details of a Car Parking and Cycle Parking Design and Management Plan illustrating the internal layouts and accessibility, shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the dwellings hereby approved. The Plan should provide details on how general and blue badge car parking spaces will be allocated to future residents. The development shall be operated only in accordance with these approved details permanently thereafter.

Reason: To promote sustainable and equitable patterns of transport, in accordance with Section 9 of the National Planning Policy Framework (2021) and policies T2 and T6 of the London Plan (2021)

27. Refuse and Recycling Storage and Collection

The approved refuse and recycling storage provision and collection arrangements shall be provided prior to the first occupation of the relevant use to which the store(s) serves and retained thereafter in accordance with Council policies.

Reason: To secure the necessary recycling and waste enclosures to support the development, and to ensure that responsible waste management practices are adhered to in the interests of the visual amenity of the area, and in accordance with policy SI8 of the London Plan (2021); policy 1.1(e) of Ealing's adopted Development (or Core) Strategy (2012); policies 7A, LV7.4 and 7B of Ealing's Development Management DPD (2013); and (interim) SPG 4: Refuse and Recycling Facilities.

28. Energy and CO₂

- a) Prior to commencement of the superstructure of the development hereby approved, 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 against SAP10 standards of at least 58.32% (equating to 65.9 tonnes of CO₂ per year) beyond Building Regulations Part L 2013. These CO₂ savings shall be achieved through the Lean, Clean, Green Energy Hierarchy as detailed in the approved Energy Strategy prepared by Hoare Lea in January 2022 (v1) including:
- i. Lean, passive design measures to achieve an annual reduction of at least 10.44% equating to at least 11.8 tonnes in regulated carbon dioxide (CO₂) emissions over BR Part L 2013.
 - ii. Green, renewable energy equipment including the incorporation of photovoltaic panels with a combined total capacity of at least 30 kWp, and Air Source Heat Pumps to achieve an annual reduction of at least 47.88%, equating to 54.1 tonnes, in regulated carbon dioxide (CO₂) emissions over Part L 2013.
 - iii. Seen, heat and electric meters installed to monitor the performance of the PV and the carbon efficiency (SCOP) of the heat pumps including the heat generation and the combined parasitic loads of the heat pumps.
- b) Prior to commencement of the superstructure of the development hereby approved, the Applicant shall submit an energy strategy addendum confirming the installation of domestic scale PV arrays on the two townhouses.
- c) 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 exact number of heat pumps, the heat pump thermal kilowatt output, heat output pipe diameter(s), parasitic load supply schematics, monthly energy demand profile, and the exact number of PV arrays, the kWp capacity of each array, the orientation, pitch and mounting of the panels, and the make and model of the panels. The name and contact details of the heat pump and PV installation contractor(s), and if different, the commissioning electrical or plumbing contractor, should be submitted to the Council prior to installation.

- d) 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.
- e) The development shall incorporate the overheating and cooling measures detailed in the Overheating Risk Assessment produced by Hoare Lea (Appendix C of the Energy Strategy in January 2022. The assessment shall be compliant with the relevant CIBSE guidance TM59 and also modelled against the DSY1 (average summer) weather data files, and the more extreme weather DSY2 (2003) and DYS3 (1976) files.
- f) Within three months of first occupation 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 Certificates (EPC) shall be submitted to the Council for approval.

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

29. 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 (COP) of any renewable/low-carbon 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 (Energence Ltd) on commencement of construction to facilitate the monitoring process.
- c) Upon final completion of the development and prior to occupation, the developer must submit to the Council proof of a contractual arrangement with a certified contractor that provides for the ongoing, commissioning, maintenance, and repair of the renewable/low-carbon energy equipment for a period of 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.

30. 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.

31. Sustainable Design and Construction

Prior to completion the sustainability measures detailed in the final approved Sustainability Strategy prepared by Hoare Lea (rv2) in February 2022 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.

32. Whole Life-Cycle Carbon Assessment

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.

The Development shall implement the measures identified in the WLC Assessment (rev-1) prepared by Hoare Lea in February 2022. Modules A1-A5 (Sourcing / Construction) should achieve 582 KgCO₂e/m² and B1-C4 (In-use / End of life) aim to achieve at least the minimal GLA benchmark of 400 KgCO₂e/m².

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

33. Circular Economy

Prior to the first occupation 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 Hoare Lea Circular Economy Statement (rev-0) 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 diverting the London Plan target of 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 S17.

34. Sustainable Urban Drainage

The development hereby approved shall be carried out in accordance with the details and recommendations set out in the submitted Flood Risk Assessment & Suds Report prepared by Graphic Structures (Version 5, dated February 22).

Reason: To prevent flooding elsewhere by ensuring enough storage of surface flood water is provided and achieved with appropriate sustainable drainage techniques, in accordance policies 1.1 & 1.2 of the Ealing Core Strategy (2012); policy 5.12 of the Ealing Development Management DPD (2013); policies SI12 and SI13 of the London Plan (2021); and the National Planning Policy Framework (2021).

35. Passenger Lifts

The passenger lifts as indicated on the hereby approved plans listed in Condition 2, shall be installed and operational prior to the first residential occupation of the development and maintained in perpetuity.

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 policies D5, D6 and D7 of the London Plan (2021); policy 1.1(h) of the Ealing Development Strategy 2026 (2012); policy 7B of the Ealing Development Management DPD (2013); and interim Ealing SPG 'Accessible Ealing' (2012).

36. Accessible Units

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

Reason: To ensure that the development is adaptable, flexible, convenient and appropriate to the changing needs of the future occupiers, in accordance with policies D5, D6 and D7 of the London Plan (2021); and policy 1.1(h) of the Ealing Development Strategy 2026 DPD (2012).

37. Wheelchair Units

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

Reason: To ensure the provision of wheelchair housing in a timely fashion that would address the current unmet housing need; produce a sustainable mix of accommodation; and provide an appropriate choice and housing opportunity for wheelchair users and their families, in accordance with the objectives of policies D5, D6 and D7 of the London Plan (2021); and policy 1.1(h) of the Ealing Development Strategy 2026 DPD (2012).

38. Floodlights, Security lights and Decorative External Lighting

External artificial lighting at the development shall not exceed the vertical illumination lux levels at neighbouring premises that are recommended 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 Notes.

Reason: To ensure that the amenity of occupiers of surrounding premises is not adversely affected by lighting, in accordance with policies D3, D4 and D6 of the London Plan (2021) and policies 7A and 7.4 of the Ealing Development Management Development Plan Document (2013) and the National Planning Policy Framework (2021).

39. Secured by Design

The development hereby approved shall achieve Secured by Design accreditation.

Reason: To promote safe and accessible places, so that crime and disorder, and the fear of crime do not undermine the quality of life for prospective residents or community cohesion in accordance with policy 7.3 of the Ealing Development Management DPD (2013) and Sections 8 and 12 of the National Planning Policy Framework (2021).

40. 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 7.4 and 7B of the Ealing Development Management DPD (2013), policies D1, D4 and D8 of the London Plan (2021), section 12 of the National Planning Policy Framework (2021).

INFORMATIVES

1. The decision to grant planning permission has been taken having regard to the policies and proposals in National Planning Policy Guidance, 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 (2021)

London Plan (2021)

GG1 Building strong and inclusive communities

GG2 Making the best use of land

GG3 Creating a healthy city

GG4 Delivering the homes Londoners need

GG5 Growing a good economy

GG6 Increasing efficiency and resilience

D1 London's form, character and capacity for growth

D2 Infrastructure requirements for sustainable densities

D3 Optimising site capacity through the design-led approach

D4 Delivering good design

D5 Inclusive design

D6 Housing quality and standards

D7 Accessible housing

D8 Public realm

D9 Tall buildings

D10 Basement development

D11 Safety, security and resilience to emergency

D12 Fire safety

D13 Agent of Change

D14 Noise

H1 Increasing housing supply

H2 Small sites

H3 Meanwhile use as housing

H4 Delivering affordable housing

H5 Threshold approach to applications

H6 Affordable housing tenure

H7 Monitoring of affordable housing

H8 Loss of existing housing and estate redevelopment

H9 Ensuring the best use of stock
H10 Housing size mix
H12 Supported and specialised accommodation
S1 Developing London's social infrastructure
S2 Health and social care facilities
S3 Education and childcare facilities
S4 Play and informal recreation
S5 Sports and recreation facilities
E7 Industrial land
E11 Skills and opportunities for all
HC3 Strategic and Local Views
G1 Green infrastructure
G3 Metropolitan Open Land
G4 Open space
G5 Urban greening
G6 Biodiversity and access to nature
G7 Trees and woodlands
G8 Food growing
SI 1 Improving air quality
SI 2 Minimising greenhouse gas emissions
SI 3 Energy infrastructure
SI 4 Managing heat risk
SI 5 Water infrastructure
SI 7 Reducing waste and supporting the circular economy
SI 12 Flood risk management
SI 13 Sustainable drainage
T1 Strategic approach to transport
T2 Healthy Streets
T3 Transport capacity, connectivity and safeguarding
T4 Assessing and mitigating transport impacts
T5 Cycling
T6 Car parking
T6.1 Residential parking
T7 Deliveries, servicing and construction
T9 Funding transport infrastructure through planning
DF1 Delivery of the Plan and Planning Obligations

Mayor of London Supplementary Planning Guidance /Documents
Play and Informal Recreation SPG (2012)
Accessible London: achieving an inclusive environment (2014)
Sustainable Design & Construction (2014)
The control of dust and emissions during construction and demolition SPG (2014)
Housing SPG (2016)
Nationally Described Space Standards (2015)
Affordable Housing & Viability SPG (2017)
Environmental Strategy (2018)
Energy Planning Guidance (2019)

Adopted Development (Core) Strategy (2012)

Chapter 1 - Vision for Ealing 2026

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

1.2 Delivery of the Vision for Ealing 2026 (a), (b), (d), (e), (f), (g), (h), (i), (k), (m)

Chapter 5 – Protecting and enhancing Ealing’s Green and Open Spaces

5.5 Promoting Parks, Local Green Space and Addressing Deficiency (b)

Chapter 6 – Ensuring Sustainable Delivery

6.1 Physical Infrastructure

6.2 Social Infrastructure

6.3 Green Infrastructure

6.4 Planning Obligations and Legal Agreements

Ealing Development Management Development Plan Document (2013)

Ealing Local Variation to London Plan Policy 2.18 Green Infrastructure: The Network of Open and Green Spaces

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 Developments

Ealing Local Policy - 3A Affordable Housing

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

Ealing Local Policy 7A Amenity

Ealing Local Variation to London Plan Policy 7.3 Designing Out Crime

Ealing Local Variation to London Plan Policy 7.4 Local Character

Ealing Local Policy 7B Design Amenity

Ealing Local Variation to London Plan Policy 7.7 Location and Design of Tall and Large Buildings

Ealing Local Policy - 7D Open Space

EA Ealing Local Policy Presumption in Favour of Sustainable Development

Other Material Documentation:

SPG 3: Air Quality

SPG 4: Refuse and Recycling

SPG 9: Trees

SPD9: Legal Agreements, Planning Obligations and Planning Gain

Interim SPG 10: Noise and Vibration

Sustainable Transport for New Development SPD December 2013

Planning New Garden Space SPD

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.

In reaching the recommendation to grant permission, specific consideration was given to the principle of the development, the quality of the proposed accommodation, the impact on the amenities of neighbouring properties and on the character and visual amenity of the surrounding area as a whole, sustainability, and the potential impacts on the highway network. 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. Demolition and construction 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.
3. BPM & mitigation measures can be found in the following guidance:
 - i. 'Guidance on the Assessment of dust from demolition and construction', IAQM, February 2014
 - ii. 'The control of dust and emissions from Construction and Demolition' SPG, GLA,2014
 - iii. BS 5228-1:2009+A1:2014 – Code of practice for noise and vibration control on construction and open sites: Noise
4. All occupiers surrounding the site should be notified in writing at least 21 days prior to the commencement of any site works, of the nature and duration of works to be undertaken and subsequently be regularly updated. The name and contact details of persons responsible for the site works should be signposted at the site entrance or hoarding in case of emergency and for enquiries or complaints. Any complaints should be properly addressed as quickly as possible.
5. Dust mitigation and control of exhaust emissions from construction vehicles should comply with the Mayor's (GLA and London Councils) 'Best Practice Guidance' to control dust and emissions from construction.
6. 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.

7. The developer will be liable for the cost of any repairs to damage to the footway directly resulting from the construction work. It is recommended that a footway/carriage way condition survey is carried out prior to the start of construction work, in conjunction with the Highways Section.
8. No waste materials should be burnt on site of the development hereby approved.
9. With regard to Surface Water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow guidance under sections 167 & 168 in the National Planning Policy Framework. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>.
10. Thames Water would advise that with regard to Waste Water Network and Sewage Treatment Works infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. Thames Water will need to check that your development doesn't limit repair or maintenance activities, or inhibit the services Thames Water provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.
11. Thames Water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.
12. 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. Thames Water 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 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.