
Ref : 231604FUL SMITHS FARM, NORTHOLT, UB5 6AH

Proposal: Application for redevelopment of site to provide 220 dwellings in 7 blocks of between 4 and 7 storeys; conversion of locally listed farmhouse and barns to provide a cafe / commercial unit (Class E); 67 car parking spaces; improved public access between Northala Fields and Marnham Fields along with associated enhanced landscaping, cycle parking and refuse storage.

Drawing numbers: 395-PL-011 Rev 01 Existing Block Plan, 395-PL-010 Rev 01 Site Location Plan, 395-PL-040 Rev 01 Existing Site Location AA, 395-PL-041 Rev 00 Existing Site Sections BB and CC, 395-PL-100 Rev 02 Proposed Block Plan, 395-PL-101 Rev 07 Proposed Site Plan, 395-PL-200 Rev 03 Block A - Proposed Ground Floor Plan, 395-PL-201 Rev 03 Block A - Proposed First Floor Plan, 395-PL-202 Rev 03 Block A - Proposed Second Floor Plan, 395-PL-203 Rev 03 Block A - Proposed Third Floor Plan, 395-PL-205 Rev 03 - Block A - Proposed Roof Plan 395-PL-218 Rev 03 - Block D - Proposed Ground Floor Plan, 395-PL-219 Rev 02 - Block D - Proposed First Floor Plan, 395-PL-220 Rev 02 - Block D - Proposed Second Floor Plan, 395-PL-221 Rev 02 - Block D - Proposed Third Floor Plan, 395-PL-222 Rev 02 - Block D - Proposed Fourth Floor Plan, 395-PL-223 Rev 02 - Block D - Proposed Roof Plan, 395-PL-228 Rev 04 - LLB and Outbuilding - Proposed Ground Floor Plan, 395-PL-229 Rev 02 - LLB and Outbuilding - Proposed First Floor Plan, 395-PL-230-02 Rev 02 - LLB and Outbuilding - Proposed Roof Plan, 395-PL-231 Rev 03 - Blocks B and C - Proposed Ground Floor Plan, 395-PL-232 Rev 02 - Blocks B and C - Proposed First Floor Plan, 395-PL-233 Rev 02 - Blocks B and C - Proposed Second Floor Plan, 395-PL-234 Rev 02 - Blocks B and C - Proposed Third Floor Plan, 395-PL-235 Rev 02 - Blocks B and C - Proposed Fourth Floor Plan, 395-PL-236 Rev 01 - Blocks B and C - Proposed Fifth Floor Plan, 395-PL-237-01 - Blocks B and C - Proposed Sixth Floor Plan, 395-PL-238 Rev 01 - Blocks B and C - Proposed Roof Plan, 395-PL-239 Rev 04 - Blocks E and F - Proposed Ground Floor Plan, 395-PL-240 Rev 03 - Blocks E and F - Proposed First Floor Plan, 395-PL-241 Rev 02 - Blocks E and F - Proposed Second Floor Plan, 395-PL-242 Rev 02 - Blocks E and F - Proposed Third Floor Plan, 395-PL-243 Rev 02 - Blocks E and F - Proposed Fourth Floor Plan, 395-PL-244 Rev 01 Blocks E and F - Proposed Fifth Floor Plan, 395-PL-245 Rev 01 Blocks E and F - Proposed Sixth Floor Plan, 395-PL-246 Rev 01 Blocks E and F - Proposed Roof Plan, 395-PL-247 Rev 02 Block G - Proposed Ground Floor Plan, 395-PL-248 Rev 01 Block G - Proposed First Floor Plan, 395-PL-249 Rev 01 Block G - Proposed Second Floor Plan, 395-PL-250 Rev 01 Block G - Proposed Third Floor Plan, 395-PL-251 Rev 01 Block G - Proposed Roof Plan, 395-PL-300 Rev 01 Block A - Proposed West Elevation, 395-PL-301 Rev 01 Block A - Proposed East Elevation 395-PL-302 Rev 01 Block A - Proposed North and South Elevations, 395-PL-309 Rev 01 Block D - Proposed West Elevation 395-PL-310 Rev 01 Block D - Proposed East Elevation, 395-PL-311 Rev 01 Block D - Proposed North and South Elevations, 395-PL-315 Rev 02 LLB Proposed Elevations 1, 395-PL-316-00 LLB Proposed Elevations 2, 395-PL-320

Rev 01 Proposed Combined West Elevation, 395-PL-321 Rev 02 Proposed Combined South Elevation, 395-PL-322 Rev 02 - Proposed Combined East Elevation, 395-PL-323 Rev 01 - Proposed Combined North Elevation, 395-PL-324 Rev 01 - Proposed Combined Internal West Elevation, 395-PL-325 Rev 01 - Proposed Combined Internal South Elevation, 395-PL-326 Rev 01 - Proposed Combined Internal East Elevation, 395-PL-327 Rev 01 - Proposed Combined Internal North Elevation, 395-PL-328-00 - Blocks B and C - Proposed South Elevation, 395-PL-329 Rev 01 - Blocks B and C - Proposed East Elevation, 395-PL-330-01 Rev 01 - Blocks B and C - Proposed North Elevation, 395-PL-331-01 Rev 01 - Blocks B and C - Proposed Sectional North Elevation, 395-PL-332 Rev 01 - Blocks B and C - Proposed West Elevation 395-PL-333 Rev 01 - Blocks B and C - Proposed Sectional West Elevation, 395-PL-334-00 - Blocks E and F - Proposed Northeast Elevation, 395-PL-335-00 - Blocks E and F - Proposed East Elevation, 395-PL-336-00 - Blocks E and F - Proposed South Elevation, 395-PL-337-00 - Blocks E and F - Proposed West Elevation, 395-PL-338-00 - Blocks E and F - Proposed Sectional North Elevation, 395-PL-339 Rev 01 - Blocks E and F - Proposed Southwest Elevation, 395-PL-339 Rev 01 - Blocks E and F - Proposed Southwest Elevation, 395-PL-335 Rev 01 - Blocks E and F - Proposed East Elevation, 395-PL-341-00 - Block G - Proposed West and Southwest Elevations 395-PL-342-00 - Block G - Proposed Southeast Elevation, 395-PL-343-00 - Block G - Proposed Northeast and North Elevations, 395-PL-350 Rev 02 Proposed Street scene - Kensington Road,

Supporting Documents: Environmental Statement (Contamination Report) by Lanmor Consulting (January 2022); Air Quality Assessment by DJC Housing Consultants (March 2023); Daylight and Sunlight Report by Lumina (February 2023); Design and Access Statement by WaM Architecture (March 2023); Heritage Statement by Asset Heritage Consulting (February 2023); Condition Report on Farmhouse and adjacent outbuildings by Stone Rose (undated); Drainage Strategy and Flood Risk Assessment by Lanmor Consulting (March 2023); Ecological Impact Assessment by David Archer Associates (February 2023); Sustainability & Energy Statement by Bluesky Unlimited (March 2023); Planning and Affordable Housing Statement by Howarth Homes Plc (March 2023); Noise Impact Assessment Report by KP Acoustics (February 2023); Statement of Community Involvement by Polity ((March 2023); Transport Statement by Lanmor Consulting (February 2023); Travel Plan) by Lanmor Consulting (February 2023); Construction Logistics Plan by Lanmor Consulting (March 2023); Delivery and Servicing Management Plan by Lanmor Consulting (February 2023); Arboricultural Implications Report and Landscape Assessment by David Archer Associates (January 2022); Planning Gateway One Fire Statement by London Bridge Associates Ltd (February 2023); Fire Statement by London Bridge Associates Ltd (February 2023); Overheating Assessment by Queensbury Design Ltd (March 2023); GLA Carbon Emissions Reporting Spreadsheet, Circular Economy Statement by Cooper Homewood (March 2023); Whole Life Carbon Assessment by Cooper Homewood (March 2023);

Biodiversity Impact Calculation Report by Syntegra (December 2022), Market Demand Report by Vokins Chartered Surveyors (November 2022), Landscape Addendum by WaM, Schedule of Accommodation Rev 01 by WaM (June 2023), Final Biodiversity Metric Calculations by David Archer Associates, Play Strategy by Udal Landscape Architecture (June 2023), Visual Impact Assessment (July 2023), Alternative Sites Assessment (July 2023).

Type of Application: Major

Application Received: 12/04/2023 Revised: 21/06/2023

Report by: John Robertson

Recommendation: Grant with conditions subject to Stage II referral to the Mayor of London, completion of a S106 Agreement and a S278 Agreement, and subject to conditions of consent. This permission would also be subject to a Community Infrastructure Levy payment to the Greater London Authority (GLA).

Heads of Terms

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

Contribution Heading	Proposed Contributions
Education infrastructure (John Chilton School / Gifford Primary School and John Chilton School / Greenford High School (secondary level)	£542,023
Healthcare provision	£500,000
Air Quality Monitoring	£ 22,800
Carbon Dioxide Offsetting	£ 50,816
Renewable & Low Carbon Energy Monitoring	£ 16,462
Children’s playspace provision	£100,000
Improvements to Smiths Farm Open Space	£150,000
Improvements to paths, the bridge and signage in surrounding area	£ 57,000
Indoor and outdoor sports provision	£250,000
Police infrastructure	£16,339
Town centre improvements (public realm and active travel infrastructure)	£100,000
Apprentice and Local Labour Scheme	£ 30,000
Accident remedial scheme on Kensington Road	£ 50,000
Review of CPZ parking and waiting restrictions near the development	£40,000
Speed tables at junctions near the development	£30,000
Cycle infrastructure improvements near the development	£50,000
Bus stop improvements near site	£20,000
Pedestrian infrastructure improvements near the development	£40,000
Travel Plan Monitoring	£ 3,000
Total Contributions	£2,089,440

- Affordable Housing provision of 111 flats (50.4% of habitable rooms), the tenure mix as a percentage of total affordable units being London Affordable Rent (64%) and Shared Ownership (36%);
- An early stage review of affordable housing provision;
- Participation in an Apprentice and Placement Scheme, which shall provide opportunities across the development, including the construction, design and post construction management of the development. Details of the Apprentice and Placement Scheme including the number of placements details shall be agreed with the Council and include 15 apprenticeships over 3 years; this is in addition to the contribution towards an Apprentice and Local Labour Scheme;
- Restriction of Parking Permits - all the units shall be precluded from obtaining a parking permit and visitor parking vouchers to park within surrounding Controlled Parking Zones and any future CPZs in the area;
- Free 2 years car club membership to residents of the development.
- Additional Contribution for Carbon Dioxide Offsetting (carbon shortfall calculated at current rate of £60 per tonne of carbon for 30 years in the event that the CO2 emissions of the development, including both residential and non-residential, cannot be achieved onsite) as identified in the table above;
- Implementation of the Travel Plan with funding for cycle and road safety education training to all scheme residents;
- All contributions to be index linked;
- Payment of the Council's reasonable Legal and other professional costs in preparing and completing the agreement.

AND

S278 works to implement the site access junction with the proposed cycle route on Kensington Road and introduce raised tables at site accesses;

AND

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

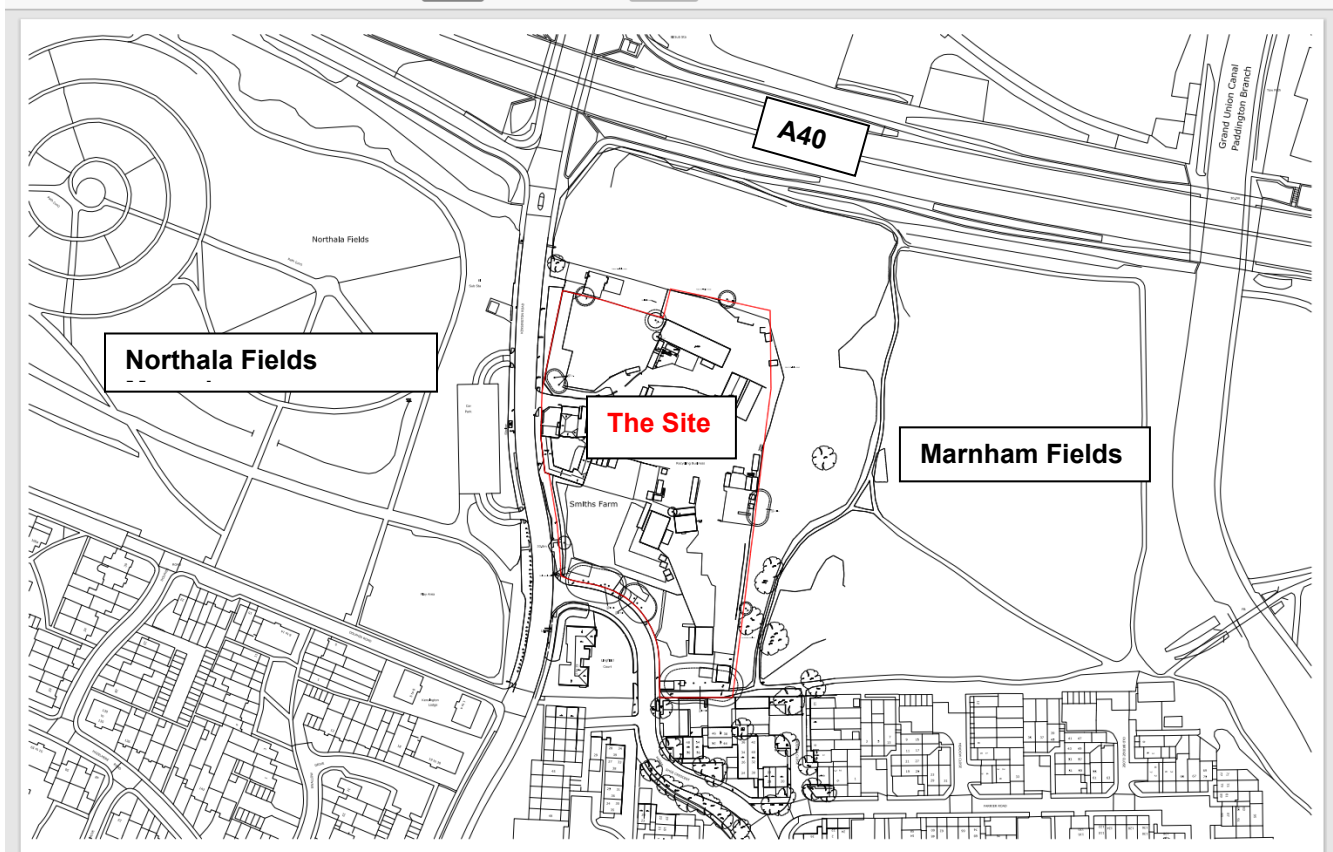
Executive Summary:

This application seeks permission for a mainly residential redevelopment of a previously developed industrial site within the Green Belt.

The site lies on the eastern side of Kensington Road some 60m south of the A40 and north of Horse Shoe Crescent. It comprises 1.5 ha occupied by a two storey dwelling and a number of single storey commercial/industrial buildings, temporary structures and extensive hardstanding. Current uses include car sales, a lorry park, and storage of plant and construction equipment.

The site lies within the Metropolitan Green Belt and adjoins open land to the north, east and west, including the Northala Fields mounds and Marnham Fields Country Park, that is also within the Green Belt and designated as Public Open Space and a Site of Importance for Nature Conservation (SINC). The farmhouse and associated outbuildings/barns on the site are locally listed. The site is allocated for residential led development in the emerging Ealing local Plan.

This proposal is for redevelopment to provide 220 dwellings in 7 blocks of between 4 and 7 storeys. The locally listed farmhouse and barns would be converted to provide a cafe / commercial unit. The scheme would also provide a landscaped pedestrian/cycle route across the site between Northala Fields and Marnham Fields along with enhanced landscaping and planting of 115 new trees. 67 car parking spaces and 420 cycle parking spaces are proposed along with 2,865 sq. m of private amenity space, and some 3,380 sq. m of communal amenity space, mainly in a landscaped central park area.



Site Location

The scheme would make an important contribution to meeting local housing demand. Over half of all residential units, comprising 111 flats, would be affordable. It proposes 50% affordable housing on a habitable room basis and with a policy compliant tenure split of 60% social rented and 40% intermediate units. This provision is supported by the Council’s Housing section.

The proposal would constitute inappropriate development in the Green Belt. However, this is a brownfield site that has been allocated for residential-led development in the emerging local plan, and on which the Council has previous resolved to approve residential development. In addition, a range of very special circumstances apply which, on balance, are considered to outweigh any harm to the Green Belt. These include:

- provision of 110 units of market housing to meet local housing needs;
- provision of 111 units of affordable housing;
- provision of over 0.5 ha of new, publicly accessible open space within the site;
- improvements to public accessibility, landscaping and connections between Northala Fields, Marnham Fields and the Grand Union Canal, supported by S106 financial contributions;
- the refurbishment and re-use of Locally Listed Heritage Assets on the site;
- remediation of a contaminated site and unsightly site within the Green Belt;
- a Biodiversity Net Gain which would exceed the 10% policy requirement.



Proposed Site Layout

While there would be a loss of employment land, much of the site is used for car sales and adequate justification for this loss has been provided as required by Ealing DPD Policy 4A while the principle of residential development has previously been accepted on the site.

The proposed built development involves 7 new blocks of flats between 4 and 7 storeys high as well as conversion of the locally listed farmhouse and barns to provide a cafe / commercial unit. The 7 residential blocks and the retained farmhouse would be arranged around a large landscaped park area in the centre of the site. The locally listed building would form part of the western side of this grouping, with a frontage on Kensington Road adjoining the main site entrance.

Over 60% of the flats would be larger, family sized units and over 82% would be dual aspect units, providing adequate environmental conditions and living conditions in terms of floor space, layout, daylight and visual outlook.

All the flats would have private balconies that meet London Plan standards. A large, landscaped central park is proposed within the site and there would be adequate amenity space. A shortfall in playspace for older children would be mitigated by a S106 contribution to off-site provision. A landscaped cycle/pedestrian route would also run through the site giving improved public access between Northala Fields and Marnham Fields open space, with a new pedestrian crossing on Kensington Road.

The design of the scheme is the result of extensive pre-application discussion with officers of Ealing Council and the GLA, and public consultation with local residents. Its scale and design are considered acceptable and not to have unacceptable visual impacts on nearby open land or on the amenity of nearby dwellings. While the current scheme contains more dwellings and higher buildings than a scheme refused last year, its design, layout and extensive provision of landscaped open space are considered far superior and more acceptable within its Green Belt surroundings.

It is not considered that the proposal would cause significant harm to nearby heritage assets and any harm would be less than substantial and outweighed by the benefits of the proposal.

The proposed development would provide high standards in terms of sustainable design and construction including Air Source Heat Pump distribution loops (for each of the blocks of flats, dwelling water source heat pumps and five photo-voltaic arrays on the block roofs. With these measures, the overall site-wide CO2 emissions would be cut by at almost 90%. Potential impacts with regard to air quality, noise, and land contamination can be adequately dealt with by the conditions proposed.

Transport Services consider the development acceptable in transport terms subject to conditions and financial contributions towards the review of parking restrictions and a potential CPZ, raised tables at site entrance junction, accident remediation measures, bus stop improvements, and works to improve local pedestrian and cycle infrastructure. S106 contributions have been agreed for such measures. With these measures, including potential parking restrictions on nearby roads and provision of car club memberships to scheme residents, potential impacts arising from the proposal will be satisfactorily mitigated.

The entrance to the site will impact a planned cycle route along Kensington Road, and details will be required of how cyclists from the site will safely join the cycle route. A condition has been applied to require approval of the design of this junction prior to commencement of buildings.

Traffic impacts of the development are estimated to be less than from the existing use, with much fewer heavy vehicles. With appropriate conditions and S106 contributions, the proposed development would be acceptable in transport terms.

Various measures are proposed to enhance the value of the site for wildlife and achieve biodiversity net gain and 115 new trees would be planted, enhancing what is currently an untidy site covered in hardstanding, poor quality buildings and parked vehicles.

Overall, the scheme will provide a number of planning and regeneration benefits including a sizeable increase in the housing stock over 60% of which would be family sized units, 111 affordable flats, improvement of an unsightly, contaminated brownfield site in the Green Belt, improved public access between Northala Fields and Marnham Fields, planting of 115 new trees, refurbishing and providing a long term viable use for local listed buildings, provision of a café available to the local community and visitors to Northala Fields. There will also be some £2.6 million in S106 and CIL contributions towards infrastructure, community facilities and open space improvements in the area.

On balance, it is considered that the proposed development is consistent with the aims of the relevant policies of the adopted the Ealing Core Strategy (2012), The London Plan (2021), Relevant Supplementary Planning Guidance, the National Planning Policy Framework (2021), and the Ealing Development Management Development Plan Document (2013). As such, it is recommended for conditional approval subject to S106 and S278 legal agreements.

Site Description

The application site is located on the eastern side of Kensington Road some 60m south of the A40 and north of Horse Shoe Crescent. It comprises a 1.5 ha site occupied by a two storey dwelling and a number of single storey commercial/industrial buildings, temporary structures and areas of hard surfacing. Current uses include a lorry park, workshops, and storage of plant and construction equipment.

The A40 lies some 50m to the north of the site and is largely screened by a dense belt of trees. To the south across Horse Shoe Crescent lies a 3 storey block of flats. To the south west across Kensington Road and Dolphin Road are 2-3 storey dwellings. To the west across Kensington Road are Northala Fields, an open space with large mounds and a children's playground; this area is largely screened by trees along the site boundary. To the east lies an area of open land separated by the Grand Union Canal from Marnham Fields Country Park.

The site lies within the Metropolitan Green Belt and in Flood Risk Zone 1, with a low risk of flooding. The adjoining open land to the north, east and west, including Northala Fields, is also within the Green Belt and designated as Public Open Space and a Site of Importance for Nature Conservation (SINC). The site is also allocated for residential development in the emerging Ealing Local Plan.

There are no listed buildings within or near the site but Smith's Farmhouse and associated outbuildings/barns are locally listed. The nearest conservation areas are the Canalside Conservation area some 200m to the east and the Northolt Village Green Conservation Area 250m to the north of the site.

There are vehicular accesses to the site from Kensington Road and Horse Shoe Crescent. The Public Transport Accessibility Level (PTAL) of the site is 1b (very low) and it is not located in a Controlled Parking Zone (CPZ).

Relevant Planning History

The site has had a number of recent planning decisions for development proposals which are of general relevance:

- July 2008: refusal for demolition of existing warehouses and the erection of a new outbuilding/workshop incorporating ancillary offices at mezzanine level (PP/2008/2409);

- May 2010 and January 2011: approval of a series of Lawful Development Certificates for the retention of units 2-5 and 7-10 on the site;
- August 2013: the Council resolved to grant outline and full planning permission, subject to completion of a Section 106 Agreement, for conversion and extension of the existing farmhouse and stable buildings on the site to provide 8 flats and outline planning permission for the demolition of other buildings on the site and redevelopment to provide an additional 56 flats in three detached blocks with parking; landscaping and children's play area; and provision of landscaped extension to the Northolt and Greenford Countryside Park incorporating a fifth conical mound, foot/cycle bridge and surface crossing over Kensington Road (PP/2012/4910); this permission was not implemented.
- March 2016: withdrawn proposal for conversion and extension of existing farmhouse to provide 8 flats, together with demolition of all other buildings forming Smith's Farm Industrial Estate to provide 4 detached buildings of 2 -5 storeys comprising 66 flats, with associated parking, landscaping and children's play area; and provision of a landscaped extension to the Northolt and Greenford Country Park, incorporating a fifth conical mound, new foot/cycle bridge and surface crossing over Kensington Road; it is understood this application did not proceed due to viability issues (160531FUL).
- November 2022: permission refused for 5 residential buildings of 3-5 storeys to provide a total of 189 residential units; conversion of existing farmhouse and barns to provide a cafe / commercial unit and improved public access between Northala Fields and Marnham Fields with enhanced landscaping (Ref: 221440FUL). The refusal reasons were:
 1. inappropriate development in the Green Belt that would harm the openness of the Green Belt with no very special circumstances demonstrated;
 2. the proposed design, siting, density and scale would represent overdevelopment of the site;
 3. The application was not accompanied by a Circular Economy Statement and a Whole Life Carbon Statement;
 4. The proposed development did not incorporate adequate urban greening measures, net biodiversity gain or adequate tree replacement;
 5. The submitted drainage strategy did not accord with the London Plan (2021).
 6. The fire safety proposals for the proposed development lacked details relating to the buildings' construction, means of escape and evacuation strategy, and ongoing maintenance and monitoring of fire access for fire service personnel and equipment.

The November 2022 refused scheme is the subject of a current planning appeal.

The Proposal

The application seeks permission to redevelop the site to provide 220 dwellings in 7 blocks of between 4 and 7 storeys. In addition, the locally listed farmhouse and barns would be converted to provide a cafe / commercial unit (Class E); Improved public access would be provided between Northala Fields and Marnham Fields along with associated enhanced landscaping, cycle parking and refuse storage. Key elements of the proposed development are:

- 220 flats comprising 74 x 1-bedroom, 121 x 2-bedroom, 24 x 3 bedroom and 1 x 4 bedroom units;

- 409 sq m of Class E space in existing farmhouse and barn, including a café/ commercial use;
- 67 car parking spaces of which 15 would be disabled parking spaces;
- 420 cycle parking spaces within the buildings and across the site;
- 2,865 sq. m of private amenity space, and 3,380 sq. m of communal amenity space.

The proposed residential units would be distributed across the site as follows:

- Block A – 18 flats (8 x 1 bedroom, 4 x 2 bedrooms, 6 x 3 bedrooms);
- Block B – 25 flats (4 x 1 bedroom, 16 x 2 bedrooms, 5 x 3 bedrooms);
- Block C – 41 flats (21 x 1 bedroom, 20 x 2 bedrooms);
- Block D – 44 flats (14 x 1 bedroom, 28 x 2 bedrooms, 2 x 3 bedrooms);
- Block E – 53 flats (20 x 1 bedroom, 28 x 2 bedrooms, 5 x 3 bedrooms);
- Block F – 25 flats (4 x 1 bedroom, 17 x 2 bedrooms, 4 x 3 bedrooms);
- Block G – 14 flats (3 x 1 bedroom, 8 x 2 bedrooms, 2 x 3 bedrooms, 1 x 4 bedrooms);

In terms of affordable housing, a total of 111 affordable units (305 habitable rooms) is proposed, equivalent to 50.4% of total habitable rooms on the site.

Environmental Impact Assessment

The applicants have not sought an EIA Screening Opinion to confirm that the proposed development is not one requiring an Environmental Impact Assessment. Careful consideration has been given to the location, scale and nature of the proposals, which would primarily involve a mainly residential development and take place on previously developed land on a 1.5 ha site within the Green Belt. The proposal is a Schedule 2 development with over 150 dwellings proposed, contains a local listed building and lies partly within a SINC. However, it is not within a conservation area nor any environmentally sensitive area as defined by EIA Regulations and is not in an area of high flood risk. The proposed scale and nature of the development is not such that it would cause unusual or greater impacts than other residential development projects. The relatively few significant environmental impacts identified can be adequately addressed by the various technical reports which accompany the application. It is not therefore considered that this proposal is one requiring an Environmental Impact Assessment.

Consultation:

Public Consultation – Summary

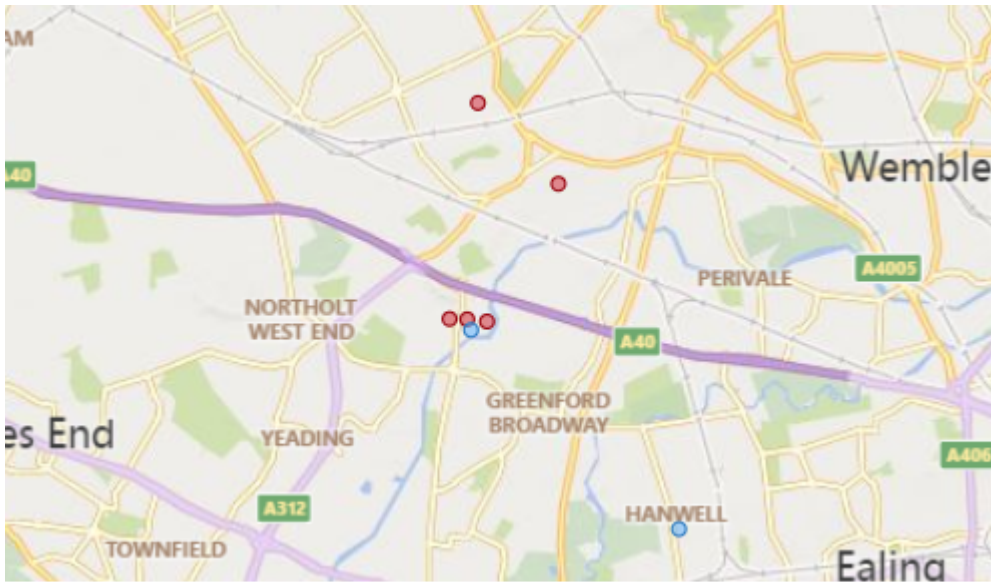
Public

Site notices were posted around the site with a consultation period between 10/05/2023 – 20/06/2023.

Six objections and 2 letters of support were received from local residents. The objections related to:

- lack of local infrastructure to support the level of housing proposed;
- overdevelopment of the site;
- excessive height and number of dwellings proposed;
- likely increase in parking pressures in the area.

The location of these representations is indicated on the plan below.



External

Environment Agency – no response.

Health and Safety Executive – noted that insufficient fire safety information was available at the time to allow a full assessment of Block B and C fifth floor and Block E and F sixth floor; the connection of the single staircase in Block E (core E1) with ancillary accommodation is not appropriate and design changes are necessary to provide alternative, separated access and egress routes from such areas; a full response is awaited.

London Parks and Gardens Trust – no response.

London Wildlife Trust – no response.

Metropolitan Police Service – seeks contribution of £16,339 to mitigate the additional impacts of this development on police infrastructure.

Natural England - no response.

GLA – the main issues raised in the Stage 1 report were:

- the proposal is inappropriate development within the Green Belt and very special circumstances are required;
- further details of very special circumstances required including assessment of alternative sites assessment and demonstrating lack of other suitable sites;
- justification needed for loss of non-designated industrial site;
- scheme may be eligible for Fast Track Route subject to Council securing affordable housing offer;
- proposal would not cause harm to locally listed buildings on site and nearby Conservation Areas;
- further information needed on children’s playspace provision;
- assessment required in relation to tall buildings London Plan Policy D9 Part C criteria.
- further details needed regarding single aspect units and internal daylight/sunlight;

- deficiencies in the ATZ assessment need to be remedied through a financial contribution or physical works, probably via s278 or s106 Agreements;
- more information required on internal access and loading; trip generation; cycle parking; deliveries and servicing; and travel planning with contributions secured on electric vehicle charging and management plans;
- more information needed on energy; circular economy and whole life-cycle carbon prior to Stage 2;
- UGF score acceptable but more information required on biosolar roofing; flood risk; sustainable drainage; water efficiency; air quality; and SINC management;
- parking design and management plan and delivery and servicing plan to be approved by condition;
- 20% active EV charging required for car parking with passive provision for all remaining spaces;
- conditions sought on post-construction report for whole life-cycle carbon assessment and circular economy measures;
- recommendations of ecological impact assessment and noise assessment to be implemented.

TFL – no response at time of writing.

NHS Property Services – no objection but requests S106 contribution of £787,052 towards local health projects.

Design Out Crime – see no reason why this proposed development would not achieve a Secured By Design Accreditation but request condition that the development must achieve Secured by Design accreditation prior to occupation.

London Fire and Emergency Planning Authority – no response.

Thames Water Utilities Ltd – development is within 15m of a strategic sewer so piling condition required; no objection with regard to surface water drainage if the developer follows the sequential approach to the disposal of surface water.

Affinity Water – site is not within Environment Agency defined groundwater Source Protection Zone or close to its abstractions; ground investigation required prior to piling or excavations below the chalk groundwater; development should include water efficient fixtures and fittings, rainwater harvesting and grey water recycling; water company to be consulted on potential water mains running through or near the development site.

Northolt Memorial Hall and Village Greens Trust – no response.

Northolt Village Conservation Area – no response.

Historic England – no comment.

Historic England (GLAAS) – considers the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation; requests condition requiring no demolition or development until a stage 1 written scheme of investigation (WSI) has been approved by the local planning authority.

Ealing Civic Society – objects on the grounds of:

- inappropriate development in the Green Belt with no very special circumstances demonstrated;
- overdevelopment of the site;
- revised proposals more damaging than those previously refused in terms of density, scale and siting;
- increase in site coverage, building heights, density and number of units proposed;

- architectural treatment lacks any integrity, with many disconnected styles proposed;
- 'Family' homes now all standard or duplex flats in blocks rather than some townhouses;
- several mature trees appear to be lost;
- low PTAL of the site is inappropriate for this scale of development;
- lack of contact with the Society during reconsultation.

Ealing Design Review Panel – raised a large number of issues at pre-application stage. Many of these requested further information. Specific comments on design issues including on the height of blocks, separation distances between blocks, landscaping, single aspect units, integration of the locally listed building within the scheme, materials and size of windows. These are addressed within the design section of the report.

Internal

Pollution Technical (Noise) – notes that site is exposed to traffic noise from local roads and the A40 and junction with the slip road; many bedrooms adjoin neighbouring kitchen/living/dining rooms/staircase and communal corridors and above/adjoining bin/cycle stores and ground floor plant rooms, with potential to cause adverse living conditions; no objections subject to various noise and odour related conditions being applied and approval of a Demolition Method Statement and Construction Management Plan;

Pollution Technical (Air quality) – no objection subject to conditions requiring approval of a Ventilation Strategy Report and an Air Quality and Dust Management Plan, and on Non-Road Mobile Machinery along with a S106 contribution of £22,800 towards air quality monitoring.

Contamination officer – requires conditions on site investigation, remediation and verification;

Transport Services – raised the following comments:

- a travel plan to be secured via a S106 agreement;
- explore potential for car club bay on site and providing free 3-year car club membership for residents of the development;
- at least 15 enlarged car parking bays required for disabled people and bays to be provided with electrical charging points;
- Construction Method Statement and Servicing and Parking Management Plan are required;
- S106 contributions of £243,000 requested towards accident remedial schemes, parking and waiting restrictions near the development, bus stop improvements, raised speed tables and local cycle and pedestrian infrastructure improvements;
- a s278 agreement is required for reinstating part of the crossover and to introduce raised tables at those proposed site access on Kensington Road;
- details required for approval of proposed cycle parking spaces.

Highways – main comments are:

- need agreed design for the site access junction where it meets planned cycle route along Kensington Road;
- should make this junction raised or blended and design needs to incorporate the new kerb line and cycle track proposed;
- need details of how cyclists will join planned cycle route or any dedicated cycle routes within the site;
- construction traffic could mean increased risks for cyclists and pedestrians at the site entrance;
- need swept path details for the site entrance based on the new kerblines there;
- queried whether roads within the site are to be adopted and what waiting restrictions applied;
- safety concern about people crossing from the car park directly to get to the café;
- northbound bus stop close to site entrance may need moving to avoid conflict with vehicles entering/exiting the site;
- no right turn pocket for vehicles arriving from the south and this may cause queues;
- CPZ and waiting controls should be considered since development will generate overspill parking into the surrounding area;

Cycling Officer – requests improved spacing between cycle stands to meet London Cycling Guideline standards;

Waste and Street Services – no response.

Energy Officer – supports the proposed energy/sustainability strategy which is all electric with no gas infrastructure on-site; various conditions are required along with S106 contributions for carbon offsetting and energy monitoring;

Flood Risk Officer – no response.

Tree Officer – objects on grounds that the proposed trees are too small to soften the tall buildings; not enough space around buildings to plant trees; the size of trees required to screen buildings would significantly shade rear gardens; the increased parking would significantly increase the risk of trees getting damaged; not enough done to incorporate the scheme into the landscape adjoining Northala Fields.

Strategic Planning – no response.

Education Services – no objection subject to a S106 contribution of £542,023 towards improvements to John Chilton School with a reserve of Gifford Primary School or other local education provision at primary phase, and John Chilton School with a reserve of Greenford High School or other education provision at secondary phase.

Assistant Director of Leisure – no response.

Director of Adult Social Services – no response.

Active Ealing – seeks contribution of around £303,000 towards projects to improve indoor and outdoor sports facility infrastructure in the local area; the development should also aim to incorporate Sport England's 'Active Design' (October 2015) throughout the proposed development.

Parks and Countryside – some concerns about the height of the blocks but since the taller blocks are to the south, this should retain the view of the mounds from Smiths Farm; no objections raised; subject to conditions on landscaping details, a landscape maintenance plan, play equipment details, and green

roofs; S106 contributions also sought to upgrade/renew elements of the nearby play area (£143,000), towards improving paths and connections with the surrounding area (£57,000), and improving Smiths Farm open space (£171,000).

Regeneration – notes loss of employment uses on the site and insufficient evidence provided to justify loss of industrial space and that site cannot be reused for industrial and related purposes; would not recommend release of industrial capacity here, in line with London Plan Policy E4, due to good strategic road access and poor public transport accessibility; new cafe should better link to and serve users of Northala Fields to support viability; supports active frontage and entrance lobbies facing landscaped public park; encourages greater uplift in jobs in the development; supports the less car dominated site layout with improved pedestrian and cyclist connectivity to new public park in the centre; S106 contribution sought towards neighbourhood centre improvements to mitigate impact of the proposed development and population uplift.

Economic Development (apprenticeships) – requests 15 apprenticeships, 20 work experience opportunities, 10 job starts, a S106 contribution of £385,000, with a penalty of £25,000 per apprenticeship opportunity not filled and school engagement work involving 40 school/ college visits and 40 school/ college workshops over 3 years.

Housing – scheme complies with Council policy position of 50% affordable housing and preferred tenure mix of 60%/40% split between London affordable rent (LAR) and intermediate homes and this tenure mix is supported; requests that shared ownership homes are made affordable to a range of incomes and not all be pitched at the top end of the shared ownership eligible income; an early stage reviews is also recommended.

CCTV Systems Manager – no response.

Councillor Rice – no objection; site could potentially draw more activity to Northolt Village but the levelling up work in the Village should sufficiently ensure that this activity does not necessarily bring a large increase of car traffic with it.

Councillor Summers – no objection but wants to see highway and parking issues addressed including traffic congestion and on-street parking on Kensington Road; notes plans to put in segregated cycle lanes there and suggests double yellow lines on both sides of Kensington Road between the A40 and Dolphin Road, and on the northern side of Horseshoe Crescent as far as Farrier Road.

It is also noted that the applicant carried out a series of pre-application discussions with Ealing planning officers and the GLA, carried out on-line briefings of local ward members, distributed a community letter in February 2023 to residents in an identified catchment around the site, set up a website for the scheme and held a drop-in session and a live presentation (webinar) of the latest proposals. Various other stakeholders were contacted with details of the website and the opportunity to participate in the webinar. The scheme was also presented to the Ealing Design Review Panel in April 2023.

Reasoned Justification:

Main Issues

The main issues in assessing this proposal are the principle of the development within Metropolitan Open Land and on a former employment site, the quantum of development, the design and impact on the character and appearance of the area, the scale of the proposed building and its relationship with surrounding properties/overall context, the impact on amenity of adjacent uses, impacts on ecology, the quality of internal living environment for residents, the transport impact of the development,

sustainability and potential operational aspects. Other issues to be considered include housing mix and affordable housing, crime prevention, accessibility, refuse and recycling storage, drainage and the Community Infrastructure Levy.

Ealing Housing Land Supply

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

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

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

Whilst the possibility of a shortfall pertains, the National Planning Policy Framework 2021 (NPPF) presumption in favour of sustainable development – the so-called 'tilted balance' – is engaged. NPPF para. 11d)ii states that in these circumstances the development plan policies most important for determining the application are to be treated as out-of-date.

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

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

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

Principle of Development

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

Section 11 of the National Planning Policy Framework ('Making Effective Use of Land') encourages as much use as possible of previously developed land and vacant buildings as well as optimising the use of land to meet as much of the identified need for housing as possible. The proposed 220 residential units would make a significant contribution to meeting housing capacity as sought by policy H1 of the London Plan.

However, the site lies wholly within Metropolitan Green Belt and London Plan Policy G2 aims to protect the Green Belt from inappropriate development and makes clear that development proposals that would harm the Green Belt should be refused except where very special circumstances exist.

Ealing Core Strategy Policy 5.1 aims to protect and enhance Metropolitan Green Belt and notes that Green Belt sites will be managed for informal recreation uses, the protection of nature conservation interests and enhancement of pedestrian and cycle links will be sought.

The NPPF also resists inappropriate development in Green Belt, which would include residential development, unless very special circumstances exist to outweigh this. However, as an exception, paragraph 149 (g) of the NPPF allows for limited infilling or the partial or complete redevelopment of previously developed land within Green Belt, whether redundant or in continuing use...which would:

- not have a greater impact on the openness of the Green Belt than the existing development; or
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

The applicants argue that the proposal would comprise "appropriate development" in terms of the exception allowed by Paragraph 149(g) of the NPPF. At present this site contains a 2 storey dwelling, industrial buildings and extensive hardstanding and comprises previously developed land. However, the proposed development of buildings between 3 and 7 storeys high would significantly increase the scale, height and footprint of buildings on the site. The building footprint would increase from 340 sq m to over 3,900 sq m. The total floorspace of buildings would increase from 409 sq m to over 19,700 sq m. This scheme would also be significantly higher than existing development nearby. The proposed 67 car parking spaces would also impact the openness of the Green Belt. It is acknowledged that the existing site, with industrial buildings and hardstanding, already harms the openness of the Green Belt. However, based on the above factors, it is considered that the proposed scale of built development would have a greater impact on the openness of the Green Belt than the existing development.

With regard to the second criterion of paragraph 149(g), it is clear that the proposal would re-use previously developed land and contribute to meeting an identified local affordable housing need. The remaining question is whether the proposal would cause substantial harm to the openness of the Green Belt.

In this context, the applicant draws attention to the Ealing Regulation 18 consultation for the emerging Local Plan, which allocates the site for residential led mixed use development although this carries quite limited weight at this stage. In addition, it is pointed out that the Green Belt review, part of the evidence base for the emerging Ealing Local Plan, indicates that this site fails to contribute to any of the purposes of the Green Belt. This review concludes that the link between the western and eastern parts of the Green Belt here is weakened by inappropriate employment uses on Smith's Farm and that this site does not feel or function like a Green Belt site. It also confirms that the site is of slight/negligible importance with regard to the Green Belt purposes of checking unrestricted sprawl of large built up areas, and safeguarding the countryside from encroachment. If the site already does not function as part of the Green Belt or contribute to it, it can be argued that any harm to its openness from this development should be considered less than substantial.

The proposed development would clearly provide a greater quantum of built development and higher buildings on the site. Some of these buildings will be visible from the open Green Belt land to the east although the proposed new tree planting and landscaping would mitigate its impacts and such an impact would not necessarily be substantial.

It is also a material consideration that the Council has previously resolved to grant permission in August 2013, subject to completion of a S106 Agreement, for substantial residential development on this site, comprising over 60 dwellings in buildings of 3-5 storeys with a built footprint of 1,390 sq m.

Overall, an argument can be made that the scale and height of built development proposed would cause harm to the openness of the Green Belt, but not necessarily substantial harm. However, on balance, it is not clear that the proposal constitutes an exception to Green Belt policy in terms of NPPF paragraph 149 (g). Very special circumstances therefore need to be shown that outweigh any harm and justify the proposal.

The following potential public benefits have been identified:

- provision of 109 units of market housing to meet local housing needs;
- provision of 111 units of affordable housing;
- provision of over 0.5 ha of new, publicly accessible open space within the site;
- improvements to public accessibility, landscaping and connections between Northala Fields, Marnham Fields and the Grand Union Canal, via a landscape masterplan strategy to be implemented by S106 financial contributions;
- the refurbishment and re-use of Locally Listed Heritage Assets on the site;
- remediation of a contaminated site and unsightly site within the Green Belt;
- a Biodiversity Net Gain which would exceed the 10% policy requirement;
- substantial S106 contributions towards local infrastructure.

The applicants argue that the first three of these benefits should be accorded very substantial weight, particularly as the Council cannot demonstrate a 5 year housing land supply.

With regard to housing provision, the housing targets for each borough are based on a Strategic Housing Land Availability Assessment (SHLAA), a key principle of which is that the target can be met without the need to consider Green Belt sites. As such, boroughs are normally expected to meet its housing need without developing on Green Belt land. However, this site is identified as deliverable for new housing in the 2017 London SHLAA. Whilst not policy, the identification of the site as being developable in the SHLAA confirms that Ealing housing targets are reliant on the site coming forward. It is also clear from a number of appeal decisions that very substantial weight has been attached to the provision of market housing in allowing developments within the Green Belt, particularly where a 5 year housing land supply cannot be demonstrated. Each case has to be determined on its own merits and it

is not appropriate to apply conclusions from one appeal to another scheme without carefully considering the specific circumstances of that case. However, in this case, it is reasonable to attach substantial weight to this factor.

The proposed 50% provision of affordable housing offer is requirement set by Policy H4 of the London Plan for industrial sites in order to follow the Fast Track Route. It is therefore arguable that the proposed 50% provision should not be considered a benefit of the development that constitutes part of the very special circumstances. However, in a number of appeals involving developments within the Green Belt, very substantial weight has been attached to the provision of affordable housing, particularly where local targets are not being met. On that basis, it is reasonable to attach substantial weight to this factor.

While it may be argued that the benefits of improved quality and accessibility of open space near the site could be achieved without the scale of development in Green Belt currently proposed, these important benefits would arise from the scheme now being considered and no information is available on what benefits would result from a reduced scale of development. There is no indication that such benefits would be realised other than by approving residential development on the site. On balance, these benefits can be considered as forming part of the very special circumstances which apply to the proposal and should carry important weight.

Although remediation of a contaminated site within the Green Belt can also be considered a benefit, it should not be considered as very special circumstances since such remediation is essential for the scheme to be implemented.

Again, while substantial S106 contributions towards local infrastructure would result from the proposal, these cannot be considered as very special circumstances since these contributions are necessary to mitigate adverse impact of the development.

The GLA Stage 1 report considers that very special circumstances have not been adequately established to outweigh the harm the scheme would cause to the openness of the Green Belt, and further information is required in order to establish very special circumstances. However, it also notes that the scheme could be acceptable in principle subject to satisfactory information being provided.

The GLA have also requested that an assessment should demonstrate that no suitable, alternative, non-Green Belt sites exist to meet Ealing's housing need without using Green Belt land. The applicant has not provided a detailed site assessment but relies instead on work carried out for the London Strategic Housing Land Availability Assessment (SHLAA), the Council's emerging Local Plan process and its call for sites. It is argued that the inclusion of the site within the SHLAA confirms that the delivery of Smiths Farm was considered necessary to meet the strategic housing needs of London.

The Council's 2022 Site Selection Report (November 2022), which underpins the emerging Ealing Local Plan sets out the detailed process undertaken by the Council in selecting sites for proposed allocation, and discounts sites that are not deliverable. This document therefore considered alternative sites, from a range of sources, to determine where housing could be delivered. In addition, the call for sites by the Council, as part of the Local Plan process, assessed all available sites potentially able to meet housing need. As a result, the Smiths Farm site was allocated for residential led development.

Since the Council considered this site as acceptable and deliverable to meet housing need, above other sites that had been put forward, this indicates that insufficient preferable sites outside the Green Belt were available. If any other non Green Belt sites were available and suitable, they would have been allocated for housing, and no sites in the Green Belt would have been needed. Since Smiths

Farm, a Green Belt site, was allocated through the Local Plan process, this confirms that insufficient non Green Belt sites to meet Ealing's housing need were identified.

The Council's site selection process is considered robust, and the fact that this Green Belt site was allocated for housing, after consideration of other sites, supports the case that no alternative sites, that did not already benefit from allocation or planning permission, were available to meet the identified housing need for the borough. The fact that Ealing cannot currently demonstrate sufficient land with planning permission for housing, further indicates that the application site is needed for the five year supply position and as such there are no suitable alternatives to it. On that basis, it is not considered necessary for the applicant to undertake further assessment of alternative sites.

Overall, a number of important benefits would arise from the proposal which carry important weight and it is not obvious that any alternative non Green Belt sites for housing exist. On balance, therefore, it is considered that, in this case, very special circumstances have been demonstrated that would outweigh any harm the scheme would cause to the openness of the Green Belt. The proposal therefore complies with the NPPF and London Plan Policy G2.

Loss of Employment Land

The application site contains various buildings in some form of industrial or other employment use, with some existing Lawful Development Certificates for various buildings on the site for B2 and/or B8 uses.

There are 4 existing occupiers of the site, two are involved in car sales / car rather than industrial uses and one is a trucking business. There is also a groundworker (a construction professional who prepares the ground before and after building) and who is understood to have found alternative premises. The GLA seek confirmation of which existing industrial buildings are currently occupied and proposals for relocation of these tenants and this will be provided prior to the Stage 2 referral.

Policy 4A of the Ealing Development Management DPD states that outside of SIL, LSIS and Site Allocations, redevelopment of a site for a non-employment use is only permitted where all of the following can be demonstrated:

- a. the site is not viable for re-occupation (including renewal and refurbishment).
- b. the site is not viable for redevelopment/renewal for an employment use (including small offices where appropriate).
- c. the proposal does not constrain or undermine neighbouring employment uses.

Explanatory text to Policy 4A makes clear that this policy applies to employment uses which fall within the former B use classes plus other closely related uses commonly found on employment sites (for example garages and motor repair). Lawful Development Certificates confirm B2 and/or B8 uses on various buildings on the site.

This Policy also indicates that, where retaining a building or site in employment use is not viable, mixed use development which maximises the number of jobs provided should be sought. It makes clear that a site is not considered viable for redevelopment/re-occupation where it has not been lettable at a reasonable market rent for a period of two years or more.

In addition, London Plan Policy E7(C) states that mixed-use or residential development proposals on non-designated industrial sites should only be supported where:

- 1) there is no reasonable prospect of the site being used for the industrial and related purposes set out in Part A of London Plan Policy E4;
- 2) it has been allocated in an adopted local development plan document for residential or mixed-use development; or

3) industrial, storage or distribution floorspace is provided as part of mixed-use intensification.

In this policy context, a Market Demand report by a firm of commercial property surveyors accompanies the application. This notes that the occupiers have undertaken marketing, via various methods, for vacant parts of the site since May 2022, without success. The report concludes that marketing of these buildings would not produce an occupier or occupiers requiring the space for employment generating uses. It adds that, given the characteristics of the property and its location, the firm would decline instructions to market such poor-quality business space, upon the basis it would not be a productive project, and we would not wish to be associated with leasing sub-standard accommodation of the type found at Smith's Farm. In addition, they assert that, given the overall appearance and characteristics of this property, it would not be commercially viable to invest in repairing/ trying to upgrade it. The cost of this exercise would be too high in comparison with the rental returns if industrial and storage occupiers could be persuaded to operate from this property, given lack of demand for this type and kind of space.

The GLA indicate the criteria of London Plan Policy E4 must be addressed since the scheme does not seek to include any industrial floor space, the site had not been allocated for residential or mixed-use development in the adopted local plan and no evidence had been provided to establish there is no reasonable prospect of the site being used for industrial and related purposes. It is noted that the Council's Regeneration Section did not recommend release of industrial capacity here, in line with London Plan Policy E4 due to the site's good strategic road access and poor public transport accessibility. Policy E4 indicates that any release of industrial capacity should be focused in locations that are well-connected by public transport, walking and cycling and contribute to other planning priorities including housing.

However, the site has now been allocated for residential led development in the emerging Ealing Local Plan and the submitted Market Demand report confirms that the site has no reasonable prospect of viable industrial use. In addition, the site is not well-connected by public transport and would contribute to housing and particularly affordable housing priorities as sought by part E of this Policy. As such, the scheme can be considered to meet the criteria of London Plan Policy E4 to a reasonable degree.

However, the marketing and other evidence submitted indicate that the criteria of Policy 4A are met to a large extent. It is also clear from resolution to approve in August 2013 that the principle of significant residential development has previously been accepted by the Council on this site. The site has also been designated for residential led development in the emerging Local Plan. In addition, loss of employment space was not a reason for refusal in the scheme rejected in November 2022. It would therefore be difficult to justify refusal now on the grounds of loss of employment space.

In these circumstances, the proposal is considered acceptable in terms of Ealing Development Management DPD Policy 4A and London Plan Policy E7.

Mix of Residential Units

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

The proposed 220 residential units would have a range of sizes with just over one third being 1 bedroom units. However, almost 60% would be larger, family-sized 2 bedroom/4 person and 3 and 4 bedroom units, as shown below. This mix is considered acceptable in this location and environment.

Quantum of Proposed Residential Provision	
1 bedroom / 2 persons	74 (34%)
2 bedrooms / 3 persons	13 (6%)
2 bedrooms / 4 persons	108 (49%)
3 bedrooms / 5 persons	24 (11%)
4 bedrooms / 6 persons	1 (0.5%)
Total	220 (100%)

Affordable Housing

Policy H4 of the London Plan (2021) sets a strategic target of 50% of all homes to be genuinely affordable. The Ealing Core Strategy sets a borough-wide strategic target of 50% affordable housing. London Plan Policy H4 also requires 50% affordable housing, particularly on industrial land appropriate for residential use in accord with Policy E7 for schemes which result in a net loss of industrial capacity.

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

The affordable housing offer on the application site is for a total of 111 affordable units and 305 habitable rooms. This would provide 50.4% affordable housing by units on a non-designated industrial site, comprising 73% London Affordable Rent (LAR) and 27% shared ownership (intermediate) by habitable room. The LAR units would be within Blocks A and E while the shared ownership units would be within Block D. The breakdown of these units by size is indicated in the Table below.

Flat Size	Affordable Units	Market Units	Total Units
1 bedroom / 2 persons	51	23	74
2 bedrooms / 3 persons	6	7	13
2 bedrooms / 4 persons	40	68	108
3 bedrooms / 5 persons	14	10	24
4 bedrooms / 6 persons	0	1	1
Total	111 (50.4%)	109 (49.6%)	220

Flat Size	No. of Affordable Units	No. of Affordable Habitable rooms	Affordable rooms as % of Total Habitable Rooms
1 bedroom / 2 persons	51 (46%)	102	69%
2 bedrooms / 3 persons	6 (5%)	18	46%
2 bedrooms / 4 persons	40 (36%)	120	37%
3 bedrooms / 5 persons	14 (13%)	56	58%
4 bedrooms / 6 persons	0 (13%)	0	0%
Total	111 (100%)	305	50.4%

The proposed tenure of these affordable units by dwelling units is set out in the Table below.

Flat Size	London Affordable Rent	Shared Ownership	Total
1B/2P	28	13	41
2B/3P	6	0	6
2B/4P	26	24	50
3B/5P	11	3	14
4B/6P	0	0	0
Total	71 (64%)	40 (36%)	111

A breakdown of these affordable tenures by habitable rooms is also provided below.

Flat Size	London Affordable Rent	Shared Ownership	Total
Habitable Rooms	195 (64%)	110 (36%)	305

This affordable provision would comprise 28 x 1 bedroom, 32 x 2 bedroom, and 11 x 3 bedroom flats for London Affordable Rent, which is a genuinely affordable housing product. The development would provide over 50% affordable housing with a tenure split consistent with London Plan Policy H6 and the Ealing Development Management DPD.

The Council’s Housing section supports the proposed level of affordable housing and tenure mix, which comply with Council policy, but request the shared ownership units be affordable to a range of incomes and not all be pitched at the top end of the shared ownership eligible income. An early stage reviews is also recommended. The GLA notes the scheme may be eligible to follow the Fast Track Route subject to the affordable housing offer being secured.

Subject to the above provisions, the proposed affordable housing provision is considered acceptable in terms of London Plan and Ealing Core Strategy policies.

Heritage Issues

The Smiths Farmhouse and outbuildings are locally listed and the site lies approximately 250m south of the Northolt Village Green conservation area and some 200m west of Canalside conservation area. London Plan Policy HC1 states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.

Policy 1.2 (g) of the Ealing Core Strategy supports the proactive conservation and enjoyment of Ealing’s heritage assets and their significance. Ealing Development Management DPD Policy 7C states that harm to any heritage asset should be avoided and that proposals that seek to cause harm should be exceptional in relation to the significance of the asset and be clearly and convincingly justified in line with national policy.

The proposal includes demolition of the existing rear conservatory to the local listed building and replacement with a single storey extension with a paved area provided to the south of the farmhouse.

The application is accompanied by a Heritage Statement which concludes that the scheme would not affect the setting or significance of the nearby conservation areas. In relation to the locally listed farmhouse and outbuildings on the application site, it concludes that the demolition of the unattractive rear conservatory and outbuilding would not be harmful given the latter is a heavily altered structure of no heritage interest. The proposed replacement extension in indicated to be a visual improvement to

the existing conservatory that would not harm the heritage significance or the setting of this local heritage asset.

With regard to the impact of the proposed blocks of flats, the Heritage Statement notes that the existing setting of the former farmstead is an unattractive and unkempt yard that does not relate to the agricultural history of the site. Since this would be replaced by an attractive residential development with a cohesive landscape scheme, which re-provides a pedestrian link between the farmstead and Marnham Fields, and with a new paved yard to the south of the former farmhouse, this is asserted to provide a more attractive setting to the 'non-designated heritage asset'. The conversion of outbuildings to a commercial use would also provide a long-term, sustainable use for these historic structures, supporting their maintenance and conservation. Overall, it concludes that the proposal will at least 'preserve' what is significant about the former farmstead at Smith's Farm as a 'non-designated heritage asset'.

The GLA accepts the proposal would not cause harm to the significance of locally listed buildings on the site and nearby Conservation Areas.

Paragraph 197 of the NPPF makes clear that in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. On balance, the very limited harm to a non-designated asset is considered to be outweighed by the proposed provision of new housing and 111 affordable dwellings, by providing a viable use for the local listed building and by the landscaping enhancements to its setting. The proposal is therefore acceptable in heritage terms.

Design and Character

Policy D3 of the London Plan 2021 indicates housing developments should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions. This is reinforced by policies 7.4 and 7B of the Ealing Development Management DPD (2013) require new buildings to consider the most important elements of the urban context to create a positive relationship with surrounding buildings and the public realm.

The proposed built development involves 7 new blocks of flats between 4 and 7 storeys high as well as conversion of the locally listed farmhouse and barns to provide a cafe / commercial unit. The 7 residential blocks and the retained farmhouse would be arranged around a large landscaped park area in the centre of the site. The locally listed building would form part of the western side of this grouping, with a frontage on Kensington Road adjoining the main site entrance. These buildings would have the following heights:

- Farmhouse – 2 storeys with a single storey extension
- Blocks A and G forming the west side – 4 storeys
- Blocks B, D and F forming the north, south and east sides – 5 storeys
- Blocks C and E at the north east and south east corners– 5 to 7 storeys

To add variety to the roof line, some of the residential blocks would have flat roofs, some pitched roofs and others repeating gable roofs. Some elevations would have a vertical emphasis, others a more vertical emphasis. The massing of the buildings would be broken up by inset elements, use of different tones of brick, horizontal banding, string courses and vertical balustrades within brick frames to the elevations facing the central park. The repeating gable roofs of Blocks B, D and F would aim to create the rhythm and articulation of the colonnades in a traditional square or piazza.



East Elevation within the site



View of proposed development from Kensington Road

The main material for the flats would be bricks, with a variety of brick tones, different forms of bonding and protruding bricks to add articulation and variety to the elevations. A condition would be applied to approve details of external materials.

A 10m wide pedestrian and cycle route would run east-west through the southern part of the site connecting Northala Fields with the Marnham Fields open space to the east. A condition is applied to require details of its design. Landscaped parking areas would be located on the northern and southern edges of the site.

The design of the current scheme has evolved through extensive pre-application discussion with officers of Ealing Council and the GLA. It has also been reviewed by Ealing Design Review Panel, which made the following comments on design aspects of the scheme:

- the arrangement and heights of the blocks do not address orientation and aspect satisfactorily; siting taller buildings on south side of the site could negatively affect daylight within the central landscape space, and overshadow listed buildings;

Comment: the scheme has been designed around the central landscape area with the residential blocks facing inwards towards the locally listed building; the relationship of height and distance between blocks generally meets good design practice and complies with daylight and sunlight targets, with reasonably good daylight penetration into the vast majority of flats.

- further variety in height should be considered, to add hierarchy, to define the square, and to frame key views;

Comment: there is already reasonable variety of heights with buildings of 2, 4, 5, 6 and 7 storeys with the tallest elements helping frame key views to the city; the building heights also reflect daylight and sunlight considerations for adjoining buildings and the open areas within the site; the applicants also note that the heights of buildings are designed with consideration of views from Northala Mounds, aiming for a gradual height increase from the locally listed building to the tallest blocks at the eastern edge.

- require further visualisations of the scheme from the surrounding area, particularly views from Marnham Fields, where lower levels mean that building heights will be emphasised.

Comment: a Visual Impact Assessment has now been provided with views from Marnham Fields and other surrounding points; this indicates that while views from Marnham Fields will change, the impact will be moderate and not necessarily harmful.

- the separation distances between blocks, particularly between Blocks C, D and E, should be assessed with regard to overlooking and overshadowing, with the arrangement of living and sleeping areas considered to maintain privacy;

Comment: The separation between most blocks is adequate in terms of Ealing Design Guidance and to avoid unacceptable overlooking and overshadowing; where this distance is less, revisions have been made to make windows in Block F that face Block G obscure glazed and prevent overlooking; apart from some bedrooms, all habitable rooms would have adequate daylight;

- the locally listed building should be better integrated into the scheme;

Comment: the proposal has been designed around the locally listed building at the heart of the site with the landscaping scheme providing adequate space around these buildings to allow them to be better appreciated and to form the focal point of the site.

- consider simplifying and softening the angular layout of the central amenity space, reducing number of paths to provide more usable spaces; and accommodate informal play areas;

Comment: Some informal play areas are provided within the scheme; the aim was to bridge the gap between the formal arrangements of the Mounds and the informal arrangements of Marnham

Fields; the proposed landscaping scheme provides this connection along with a significant amount of play structures and informal open space; this is considered appropriate since the site is well served by other recreational opportunities nearby.

- the proportion of single aspect units is high, particularly as the site is relatively unconstrained, and this should be reduced where possible;

Comment: with 82% of the units being double aspect and only 5 single aspect north facing flats, the proportion of single aspect units is relatively low.

- need to ensure there is adequate space for the proposed air source heat pumps, photovoltaic panels and smoke shafts, with an assessment of their potential visual impact provided;

Comment: the heat pumps and photovoltaic panels will not be discernible in most views.

- brick feels appropriate, but the tonal variety could be confusing and a simpler palette of materials would help to create a more coherent 'family' of buildings;

Comment: the variation of the bricks and tones is reflect the different flat types so that grey tones are used for the maisonettes and the other bricks for the blocks; this allows each block to be clearly distinguished; in any event, details of materials will be secured by a condition.

- the variation in roofscape and use of gables works well but the additional height at the corners should be reconsidered;

Comment: the additional height at the corners, one storey higher than adjacent buildings, is so that these taller elements act as bookmarks that frame the site in views from the Mounds and the view of the city.

- need to understand how the gable roofs would be experienced internally, particularly whether the roof space is included within the unit or used as loft or plant space;

Comment: although this will be dealt with at the detailed design stage, the intention is that units below the gables will benefit from vaulted ceilings and no plant / equipment will be placed there.

- supports duplexes with individual front doors facing the central area but queries balconies at first floor for these units, which appear to be accessed from bedrooms;

Comment: while not required from an amenity perspective, these balconies provide additional outdoor space to the units and also preserve the balance of the appearance of the blocks.

- full-height glazing may not be desirable for ground floor and bedrooms for privacy reasons and could result in highly inactive frontages; sill heights should ensure that internal layouts are comfortable and flexible;

Comment: full height windows provide better outlook for occupants and frosted window film, net curtains etc can be applied to maintain privacy.

- increased clarity needed on the fronts and back of the buildings to understand the movement sequence of residents arriving by diverse transport modes;

Comment: there are various footpaths and access points that allow residents and the public to navigate their way through the public areas of the scheme, and the footpaths are large enough to also allow access by fire, delivery and refuse vehicles.

- supports proposed public route through the site to Northala Fields and Marnham Fields, and visual connections to the SINC at north of the site, but more definition of public and private areas needed;

Comment: the various private/public areas of the scheme are well defined, with the central space being public while the private gardens for lower level flats will be gated and accessible only to residents but not the public; landscaping will also be used to define the hierarchy of open spaces and a footpath between block C and E will provide connectivity between the adjoining open space and the site.

It is considered that the Design Review Panel’s comments have been adequately addressed and these points do not make the design of the scheme unacceptable.

The GLA Stage 1 report supports the proposed site layout which improves access to the wider green network. However, boundary treatments on the north and east boundaries should be carefully considered to ensure privacy and prevent overlooking of ground floor residential units, as well as the legibility of public and private spaces.

This proposal is therefore considered to comply in design terms with the objectives of section 12 of the National Planning Policy Framework, policy D3 of the London Plan (2021), and policy 7B of the Ealing Development Management DPD (2013).

Scale of Buildings and Visual Impact

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

The London Plan defines tall buildings as those that exceed the general height of their surroundings and cause a significant change to the skyline and notes they would generally be at least 6 storeys in height. Most existing buildings in the surrounding area are 3-4 storeys. While two corner elements of the proposal extend to 7 storeys in height, most of the development is 4-5 storeys, which is not significantly greater than existing buildings nearby. However, the GLA Pre-application advice indicated the scheme should be assessed against the Policy D9 design criteria and this is set out below:

- avoid harm to the significance of heritage assets and their setting:** the proposed development is not in a conservation area but affects the setting of a locally listed building. The submitted Heritage Report confirms it would not significantly affect any nearby conservation areas or statutorily listed buildings; it also concludes there would be no harmful effect on the setting of the existing local listed buildings on the site;
- in long-range views ensure careful design of the top of the building, contribute positively to the existing and emerging skyline and not adversely affect local or strategic views:** the varied building heights and roof forms of different blocks in an area of largely similar heights would contribute to a more interesting skyline; Intervening horizontal brick bands would be used on the top floors of blocks C, D and E to differentiate the top of these buildings; the taller buildings form only a small part of the development and would be only partly visible above trees in views from the

Green Belt land to the east; in views from the Northala Fields mounds the good quality buildings would replace unsightly industrial sheds and improve the view;

- c) **in mid-range views from the surrounding neighbourhood make a positive contribution to the local townscape in terms of legibility, proportions and materiality:** the buildings will be partly screened by vegetation in some views replace other built development in others; the design quality and increased landscaping will replace vehicle parking and concrete walls, giving a softer edge and making a positive contribution to the local townscape;
- d) **individually or as a group, to reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding:** the proposed scheme would add variety to the skyline and provide a marker to the proposed open space and cycle route between Northala Fields and Marnham Fields.
- e) **architectural quality and materials to be of an exemplary standard:** the architectural quality of the building is considered to be of a high standard and is designed with high quality and durable materials; the main cladding material would be brick, with complementary tones between its various massing elements, and the surrounding context;
- f) **the base of the building to have a direct relationship with the street, maintaining its pedestrian scale, character and vitality:** the base of the residential buildings including the café would face the landscaped open space and provide an active frontage and surveillance.
- g) **not cause adverse reflected glare and minimise light pollution from internal and external lighting:** the main cladding would be predominantly brick, without excessively large windows; these elements / materials will reduce or eliminate potential glare and no objections have been raised on this point; lighting in the public realm would be minimised, while still adequate to ensure safety and security and lighting to the café/commercial use at ground level would be designed to avoid light spill onto the public realm.
- h) **entrances, access routes, and ground floor uses should be designed to allow for peak time use and to ensure no unacceptable overcrowding or isolation in surrounding areas:** the site would have two access points and entrances to blocks (including to cycle and bin stores) would face the large central open space containing many paths to distribute users across a wider area; the main entrances would have reasonably large lobbies and provide significant hardstanding within the site boundary to ensure the development would not cause overcrowding within public realm areas.
- i) **noise, wind, daylight, sunlight penetration and temperature conditions around the building not to compromise enjoyment of open spaces around the building:** the proposed buildings are not particularly high, with most elements only 4-5 storeys, and should not create significant overshadowing of the large public open space proposed; there is no reason to expect that a building of this height would result in significant adverse wind impacts on public areas.
- j) **internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants:** a Fire Statement accompanies the application with details of layout, emergency access and escape routes and facade/materials and a condition will ensure implementation to accord with this; in addition, brick is to be used as the main cladding material and this has non-combustible characteristics.
- k) **must demonstrate that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services,**

walking and cycling networks, and public transport: the development would generate less traffic impacts and fewer large vehicles than the existing industrial use of the site; car parking provision would be less than London Plan maximum standards and extensive cycle parking would be provided; the site is also located within a reasonable walking and cycling distance of a primary and secondary school and some local shops; the Council’s transport section also consider the proposal will be acceptable in terms on impacts on the transport network with the required S106 contributions to infrastructure and bus services;

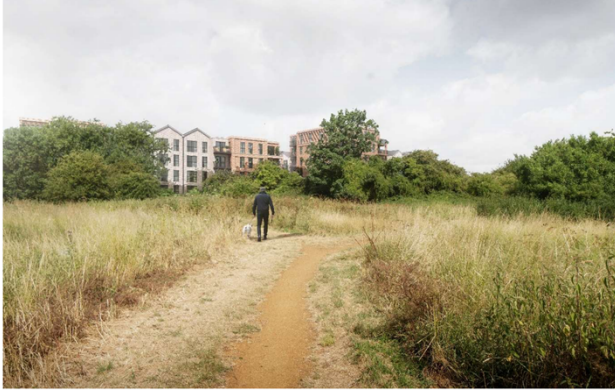
- l) **jobs, services, facilities and economic activity provided by the development should inform the design so it maximises the benefits these could bring to the area:** although the proposal is a predominantly residential scheme, it includes commercial / café space at ground floor level that provides some jobs;
- m) **free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate:** the taller buildings are purely residential but the proposal includes commercial / cafe space at ground floor level that is open to the public;
- n) **proposals for tall buildings should positively contribute to the character of the area:** the proposed buildings would provide a high quality development with a large landscaped central area and landscaped pedestrian routes through the site; this would improve what is currently an unsightly brownfield site with sheds in poor condition, unattractive boundaries and heavy vehicle parking; this can be considered to positively contribute to the character of the area.

The proposed buildings are therefore considered to comply to a reasonable extent with the criteria of policy D9 of the London Plan (2021).

In terms of wider visual impact, the proposed buildings of up to 7 storeys would be higher than any nearby buildings and would be adjoined by open land on three sides. However, landscaping with tree planting is proposed around the site and this would limit views of the buildings from the surrounding area to some extent.

A brief Visual Impact Assessment accompanies the application. This assesses impacts on various views of the site from Northala Fields to the west, Marham Fields to the east, from Kensington Road on the western site boundary and from Horseshoe Crescent to the south. There would be limited views of the site from the north where the A40 is some distance away and screened by dense trees. This assessment indicates that:

- there are some longer views of the existing site buildings from the east across open land but partly screened by existing vegetation; the proposed new buildings would be clearly visible but would not exceed foreground heights of foliage; they would have a moderate adverse impact on this view;
- in closer views from the middle of Marnham Fields to the east, again across open land, the existing industrial buildings on the site are not visible and there are no views of the Mounds due to screening by vegetation; the proposed buildings would be glimpsed between gaps in trees but would not be dominant in the landscape and this view would be largely unchanged.
- from Kensington Road on the western site boundary, the existing view is of a boundary wall and the flank elevation of the locally listed farmhouse with no views into the site itself; with the proposed development, taller buildings would adjoin the site boundary but views into the site would be opened up and clear views available of the locally listed barn; this view would be substantially changed but arguably improved.



View with Development



Existing View from Marnham Fields (east)

- from the Northala Fields mounds to the west, there is a clear view at present down into the existing untidy industrial site with many large vehicles visible and the locally listed barn not noticeable, while various residential buildings nearby are visible; with the proposed development, the important view towards the city in the background would be unaffected and the locally listed buildings would appear more prominent; the proposed buildings with varied roof forms would provide a more orderly and attractive view and the site frontage would have a more open aspect; on balance, this view would experience a moderate positive impact.



Existing View from Northala Fields (west)



View with Development

- from Horseshoe Crescent to the south, the existing view is of a high, unattractive imposing concrete wall with dense vehicle parking behind it and no active street frontage; with the proposed development, this will change to a vista of tall buildings but with a softer landscaped edge, a more active frontage and a wider, safer pedestrian areas; there would clearly be a significant visual impact but this is considered positive.
- from within the site itself, which is not currently publicly accessible, the predominant view would be of low rise industrial buildings and parked vehicles; with the proposed development, there would be public views of the Mounds and the frontage of the locally listed buildings as well as a generally more attractive environment.

Overall, the scale of buildings proposed and their visual impact are considered acceptable and compliant with London Plan policies D3 and D9 and policy 7B of the Ealing Development Management DPD (2013). However, the GLA Stage 1 report requires provision of a townscape analysis, including long-range, mid-range and immediate views of the proposed development prior to Stage 2 referral.

Impacts on Residential Amenity

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

The site is adjoined by open land on three sides. The closest existing residential properties are the 2-3 storey dwellings south of Horse Show Lane and then the dwellings west of Kensington Road and south of Dolphin Road.

In relation to the 3 storey block of flats south of Horse Shoe Lane, known as Lingfield Court, the nearest windows in it would be over 30m from the proposed Block G to the north, over 40m from the proposed Block F to the north east and some 37m from the proposed Block E to the east. While windows and balconies are proposed in the facing elevations of these 3 Blocks, Lingfield Court is largely screened by mature trees on its northern site boundary and by trees on the southern boundary of the application site. Given these factors, no unacceptable overlooking or overbearing effects appear likely here.

With regard to the dwellings west of Kensington Road and south of Dolphin Road, these would be over 50m from Block G, the nearest part of the development. There are also large trees on Kensington Road screening these dwellings from the nearest part of the proposed development. Given this large separation, no unacceptable overlooking or overbearing effects are likely.

The Ealing Housing Design Guide provides guidance on separation distances between the rear elevations of new developments aimed at maintaining privacy; this indicates 12m as appropriate. No guidance is given on separation between side elevations but it is reasonable to apply a similar figure if adequate privacy between facing windows is to be maintained. The distances between the proposed blocks of flats within the application site are set out below.

- Blocks A-B: 10.7m
- Blocks B-C: 5.3m
- Blocks C-D: 15.0m
- Blocks D-E: 18.0m
- Blocks D-F: 15.0m
- Blocks F-G: 5.5m

There would be no facing windows between Blocks B and C and Blocks E and F. There would be facing windows between Blocks D and E and Blocks D and F but the separation distances can be considered adequate. However, windows in Block G would be only 5.5m from facing windows in Block F. To address this issue, following revisions, windows in Block F that face Block G would be made obscure glazed. This removes potential overlooking although the outlook for some dual aspect Block F flats would be reduced.

There are no national planning policies specifically relating to daylight, sunlight or overshadowing. Policy D6 of the London Plan indicates that buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, with regard to

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

A Daylight/Sunlight Assessment accompanies the application and assessed windows in Lingfield Court, a 3 storey block of flats to the south of the application site. This was the only residential property close enough to be affected. The Vertical Sky Component (VSC) test was applied. This measures the amount of sky visible at a specific point on the window, reflecting the amount of daylight received. If windows achieve a VSC below 27% and have existing levels of sky visibility reduced to less than 0.8 times their former value, there would be a ‘noticeable’ impact to daylight.

This assessment concluded that all windows in Lingfield Court would continue to receive a VSC value of well over 27% VSC, which complies with BRE Guidelines for daylight and sunlight, and there will be no material impact on daylight and sunlight amenity.

Overall, the proposed development would not appear to give rise to unacceptable impacts on the living conditions of residents of neighbouring properties and it would therefore comply with London Plan Policy D6 and Policy 7B of the Ealing Development Management Development Plan Document (2013).

Quality of Residential Accommodation

Policy D6 of the London Plan (2021) and the DCLG ‘Technical Housing Standards (March 2015) set out the minimum gross internal floor space required for different sizes/occupancy levels of residential units. For the 220 residential units proposed, the table below sets out the range of floor areas provided per unit, and compares these with the minimum size requirement:

Type/Size of Units	Accommodation Sizes	Minimum Size Required
1B/ 2 persons (1 storey)	50.5 – 60.4 m ²	50 m ²
2B/ 3 persons (1 storey)	61.4 – 64.7 m ²	61 m ²
2B/ 4 persons (1 storey)	70.1 – 81.3 m ²	70 m ²
2B/ 4 persons (2 storeys)	79.8 – 93.6 m ²	79 m ²
3B/ 5 persons (1 storey)	86.0 – 96.2 m ²	86 m ²
3B/ 5 persons (2 storeys)	94.1 – 114.5 m ²	93 m ²
4B/ 6 persons (1 storey)	106.8 m ²	95 m ²

This shows that all the proposed flats would meet the minimum spatial requirements in terms of floor area. All the proposed room sizes, apart from 1 bedroom in a 4 bedroom flat in Block F, would also meet relevant standards. As this bedroom is only slightly below the minimum size and the only one in the development, on balance, this is acceptable.

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

A total of 180 dwellings would be dual aspect units, equating to 82% of the total. The 40 single aspect units would be spread across the 7 blocks A and not concentrated in any one block. Only 5 of these single aspect units would face north but these would comprise 1 and 2 bedroom flats and none would

be 3 bedroom units. Since dual aspect dwellings would provide the great majority of units, the development can be considered to comply with London Plan Policy D6.

However, the GLA Stage 1 report requires evidence, prior to Stage 2 referral, that the single-aspect units would have adequate passive ventilation, daylight and privacy, and would not overheat. Also prior to Stage 2 referral, the flats on the north-west corner of Block B, and the north-facing part of Block C should be revised to meet the standards in Appendix 3 of the Housing Design Standards LPG. In addition, the poor daylight/sunlight performance of the bedrooms of the recessed south-west corner dwellings in Block C should be reviewed.

Each core would provide an 8-person evacuation lift along with a disabled refuge in the protected stairway on each floor. An additional lift is provided in Blocks C and E. Blocks A would provide 6 units around a core, Block B 2-3 units, Blocks C and D 4 units, Block E 4 5 units, Block F 3 units, and Block G 4 units around a core.

The daylight/sunlight report accompanying the application assesses daylight levels in the proposed dwellings. The latest BRE guidelines now measure internal daylight using Lux levels measured on a horizontal Working Plane in place of the former Average Daylight Factors. The BRE pass target is 50%.

The new BRE guidance does not contain any advice on impacts of projecting or recessed balconies which result in a "canopy-effect" and "tunnel-effect" when measuring daylight. For this reason, the assessment was run "with" and "without" the effect of balconies. With this "canopy-effect" included, 516 of out of the 615 habitable rooms in the development would satisfy the internal daylight Lux target, leaving 99 rooms which would fall short.

It notes that out of these 99 below target rooms, 23 (3.7%) would only just be below that target with a coverage between 40% and 50%, 41 (6.7%) would be between 30% and 40%, and 35 (5.7%), will be below 30%. The rooms that fail are mainly bedrooms but also some living/kitchen/dining rooms.

The assessment notes that, under the new BRE method of measurement, rooms with larger depths are penalised as it is more difficult to achieve a greater degree of daylight penetration on the Working Plane. It is therefore more difficult for conventional, open plan living/kitchen/diners to meet the new targets and many of the rooms that technically "fail" are longer, open plan living/kitchen/diners located below projecting or recessed balconies. Some second bedrooms in Block E/F which face Block G a short distance away also fail.

However, when the daylight impact of the balconies is omitted, the number of rooms falling short is reduced to 48, giving a "pass" rate of 92.2%, of which 17 (2.8%) will be just below the 50% target with a coverage between 40% and 50%, 22 (3.6%) will be between 30% and 40%, and only 9 rooms (1.5%) would be below 30%.

The assessment argues that a balance needs to be struck between the provision of adequately sized private amenity balconies, as required by London Plan Policy D6, and providing good internal daylight to the flats. It also argues that there will be reasonably good daylight penetration into the vast majority of the rooms, that a 92% pass rate when the effect of balconies is taken into account is a good performance compared with other large developments of similar scale and massing and that the BRE standards should be applied flexibly taking account of the circumstances of each case.

It is reasonable to expect a lower daylight level to bedrooms without necessarily harming overall amenity. It is also noted that a significant proportion of the large living/kitchen/dining rooms which fail the BRE test still achieve adequate daylight to a significant proportion of the rooms. In addition, the

provision of balconies to give adequate private amenity space is an important consideration to be weighed against daylight shortfalls.

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

Accessible Units

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

There would be 23 fully accessible units, designed as M4(3), across the scheme: 4 in Block A, 6 in Block C, 9 in Block E and 4 in Block G. The remaining units in the development would be designed to be fully adaptable M4(2) units. The proposal would therefore comply with Policy D7.

Outdoor Amenity Space

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

All the flats would have private amenity space in form of balconies or rear gardens. These private amenity spaces would be between 5 sq m and 87.9 sq m in area depending on the size and type of unit. The table below compares proposed provision with the minimum requirement by type of unit. This shows that all units would have private amenity spaces that meet or exceed the minimum requirement.

Unit Type/Size	No. of units	Minimum Required	Private Amenity Space provision
1B/ 2 persons	74	5 sq m	5.0 – 55.1 sq m
2B/ 3 persons	13	6 sq m	6.3 – 27.8 sq m
2B/ 4 persons	108	7 sq m	7.0 – 87.9 sq m
3B/ 5 persons	22	8 sq m	8.0– 55.6 sq m
4B/ 6 persons	1	9 sq m	30.7 sq m

Based on local and London Plan planning guidelines, this development of 220 flats would require at least 1,389 sq m of private amenity space and 3,300 sq m of communal amenity space. By comparison, 2,865 sq m of private amenity space is proposed and it is indicated that there would be 3,380 sq m of communal amenity space within the central park area. There would also be landscaped areas around the edges of the sites and a landscaped pedestrian/cycle route running through the southern part of the site.

The amount of amenity space proposed meets the minimum requirement and, overall, the current proposals for amenity space are considered acceptable in quantity or quality and to comply with policy D6 of the London Plan (2021) and policy 7D of the Ealing Development Management Development Plan Document (2013).

However, the GLA Stage 1 report indicates that, prior to Stage 2 referral, details should be provided on the private amenity spaces of ground floor street and courtyard facing bedrooms to ensure the privacy of these ground floor bedrooms.

Landscaping

The landscaping approach is to provide a mix of public realm areas within the site, in the form of green space, play areas and new landscape, as well as a series of semi-private amenity areas for residents. The 0.4 ha central landscaped public square would form the heart of the new development and provide children's playspace as well as east-west routes through the site.

This central public realm area would be divided by a series of paths to create pockets of varying landscape amenity. The buildings which surround the open space would create edges and a sense of enclosure and themselves have private garden spaces fronting the public realm to soften the transition between public and private space.

Behind the buildings there would be more private open spaces which serve the individual units. These shared amenity spaces offer communal gardens and amenity for the residents of the particular block they serve.

Because of its large size, the central landscaped area would be split up into a central core of open space and a series of other areas, separated by paths, which would contain children's door step play areas, native planting, and reed beds. Other smaller play areas, areas of native planting and reed beds would be interspersed through the site. Semi-private amenity areas on the eastern site boundary would provide a transition to the Marnham Fields open space.

A key feature of the landscape approach would be a widened, landscaped corridor across the southern part of the site to provide a shared cycle and pedestrian route. This would be enhanced with new tree planting to reinforce the existing belt of trees in this location. There would also be extensive tree planting elsewhere, with 115 new trees to be planted particularly along the site boundaries.

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

Significant landscaping and tree planting is proposed within the site and the application documents confirm that the development would achieve an Urban Greening Factor of 0.42 through measures including green roofs, rainwater gardens, permeable paving and extensive native planting. Based on the submitted information, the proposal would accord with Policies G1 and G5.

The Council's Parks Department noted some concerns about the height of the blocks but, since the taller blocks are to the south, this should retain the view of the mounds from Smiths Farm. No objections were raised subject to conditions being applied on landscaping details, a landscape maintenance plan, play equipment details, and green roofs. In addition, S106 contributions were sought to upgrade/renew elements of the nearby play area (£143,000), towards improving paths and connections with the surrounding area (£57,000) and improving Smiths Farm open space (£171,000).

The GLA Stage 1 report considers the proposed development to be a well-considered approach to integrating green infrastructure and urban greening across the site. It notes the incorporation of reed

beds, SuDs planting, native planting and proposed trees will support multifunctionality, in accordance with London Plan Policy G1. However, the opportunity for the provision of biosolar roofing should be explored.

With these S106 contributions to mitigate impacts of the proposal, the landscaping proposals are considered acceptable. Conditions have been applied requiring details to be submitted of the hard and soft landscaping, boundary treatment, details of children's play areas, a Landscape Management Plan, tree planting, and sustainable urban drainage systems to be implemented on site.

The GLA Stage1 report seeks contributions to be secured by the Council towards the development and implementation of a comprehensive wayfinding strategy through the site and surrounding open spaces.

Children's Playspace

London Plan Policy S4 requires development proposals to provide play and informal recreation space based on the expected child population generated by the scheme. The Mayor's Play and Recreation SPG and Policy S4 expect a minimum of 10 sq m per child to be provided in new developments. A development of this size and dwelling mix would require a total of 711 sq m of dedicated children's play space as follows:

- under 5 age group – 377 sq m
- 5-11 age group – 248 sq m
- 12-17 age group – 86 sq m

The GLA Stage 1 report requests further information on play space calculations, with target age groups for areas of proposed play space and examples of what play space will look like. Any contributions for play space provision should also be justified and secured by the Council;

In this context, the scheme proposes a large landscaped park area of 3,380 sq m in the centre of the development with open space, planting and seating able to provide local playable space for ages 0-11. Within this area would be a 240 sq m area containing play equipment. In addition, several semi-private, shared, local playable spaces for ages 0-11 with play equipment (530 sq m) are proposed on the eastern edge of the site.

It is also noted that there are existing play areas for a range of ages, including children in 12+ age group, within 800m of the site including the adjoining Northala Fields park. However, there is not enough play space for older children and nothing for teenagers. A financial contribution of £100,000 has therefore been agreed towards offsite improvements to children's playspace.

On this basis, the proposal would provide acceptable children's playspace and comply with policy S4 of the London Plan (2021) and 7D of the Ealing Development Management Plan Document (2013).

Highways

Policy T6.1 of the London Plan (2021) requires that new residential development should not exceed the maximum parking standards set out in Table 10.3. All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. Policy T6 indicates that car-free development should be the starting point for all development proposals in places well-connected by public transport. Policy T4 requires the cumulative impacts of development on public transport and the road network capacity to be taken into account and mitigated.

The site is not located in a Controlled Parking Zone (CPZ) and has a very low PTAL level. A new vehicle access from Kensington Road is proposed on the northern side of the site to serve the parking area for the northern residential blocks. A new vehicle secondary access would be provided from Horse Shoe Crescent to serve the parking area for the southern residential blocks.

There would be pedestrian accesses at the northern and southern ends of the site. A new pedestrian cycle route running east-west to the south west of the site will link up with a new pedestrian crossing on Kensington Road and Smith Farm Fields. Turning areas are proposed within the site to enable refuse trucks, emergency vehicles and delivery vehicles to turn and leave the site in a forward gear.

A total of 67 car parking spaces are proposed within the application site, including 15 Blue Badge parking spaces. Most of these would be located in two landscaped areas at the northern and south-western edges of the site. Electric vehicle charging point facilities are to be provided to meet London Plan requirements with over 40% of spaces to have active provision at the outset and the remaining spaces to have passive provision.

This car parking provision would fall well below London Plan maximum parking standards of 0.75 to 1 space per flat for this location. There have been a few objections raised by local residents concerning increased parking pressures in the area as a result of the development and increased traffic congestion from more flats. However, a Travel Plan accompanies the application, which should reduce potential car use. Two car club spaces are proposed within the site with 2 years membership offered free to residents.

A Transport Statement accompanies the application and concludes that the development would generate a minimal increase in vehicular traffic during the morning and evening peaks, compared with existing commercial traffic generation on the site. At most, this would amount to 2 more vehicles in the morning peak hour and this is not considered to be detrimental to the capacity of the junctions in the vicinity or the main road. The Transport Statement also includes parking surveys of adjoining roads which indicated some 90 spaces available on nearby unrestricted roads that could deal with any overspill parking from the development.

Transport Services note the proposal has potential to cause parking impacts on the local area but this can be mitigated by low parking provision and a car club scheme. No objections are raised subject to:

- a travel plan should be secured via a S106 agreement;
- provision of a car club bay on the site and providing free 3-year car club membership for residents of the development;
- at least 15 enlarged car parking bays required for disabled people and bays to be provided with electrical charging points;
- provision of a Construction Method Statement and Servicing and Parking Management Plan;
- S106 contributions of £243,000 requested towards accident remedial schemes, review of CPZ parking and waiting restrictions near the development, bus stop improvements, raised speed tables and local cycle and pedestrian infrastructure improvements;
- a s278 agreement to reinstate part of the crossover, implement the site entrance junction on Kensington Road with the planned cycle route and introduce raised tables at this site access;

- approval of details of the proposed cycle parking spaces.

The Council's Highway section commented that the design for the site access junction where it meets a planned cycle route along Kensington Road, to be raised and incorporate the new kerb line and cycle track, would need to be agreed. This would also require details of how cyclists will join planned cycle route or any dedicated cycle routes within the site and swept path details for the new site entrance provided. A condition has been applied to require approval of these details prior to commencement of buildings.

In addition, Highways requested CPZ and waiting controls be considered since development will generate overspill parking into the surrounding area. This will be addressed by an agreed S106 contribution towards review of parking restrictions around the site.

The GLA request a Parking Design and Management Plan be secured by a condition, which should detail how on-site general parking provision would be converted to additional disabled person parking spaces should demand arise. Also, at least one disabled parking space should be provided for the commercial/café use prior to Stage 2.

To address concerns about parking on surrounding streets, the need for on street parking controls including a CPZ should be considered with scheme residents denied on-street parking permits. These measures are covered by the S106 Agreement and the contribution towards review of local parking restrictions.

As requested by the GLA, conditions are applied so that a Delivery and Servicing Plan and Construction Logistics Plan will be submitted for approval, and a residential Travel Plan secured, monitored, and enforced through a S106 agreement. The GLA note that the modal split and targets in the Travel Plan are not in line with the Mayor's strategic targets and need to be revised prior to Stage 2.

The GLA Stage 1 report raises concerns on conflict between pedestrians, cyclists, and vehicles from on-site loading bays in an area where pedestrian activity is heavily encouraged. Further information is required prior to Stage 2 referral, on the design/management of the internal access roads and how activity by all modes would be carried out in accordance with the Mayor's Vision Zero and Healthy Streets approach. Although contributions are also sought towards Active Travel Zone improvements, wayfinding and improved step free access at Northolt London Underground station, these measures will be covered by the agreed S106 contributions towards Northolt town centre improvements, pedestrian and cycle infrastructure and accident remedial measures.

A condition is also applied so that the number disabled parking spaces for the commercial unit will be subject to approval following approval of a Parking Management Plan.

In terms of cycle parking, Table T5 of the London Plan (2021) requires cycle parking at least in accordance with minimum standards set out in Table 10.2. This requires 1 space per 1 person/1 bedroom dwelling, 1.5 spaces per 2 person/1 bedroom dwelling and 2 spaces for all other dwellings. A further 7 spaces for short term visitor parking should also be provided based on 1 space per 40 dwellings. The requirement for the commercial space is based on floorspace. This would require 403 long stay residential spaces and 7 short stay spaces. For the commercial element, 2 long stay and 10 short stay spaces would be needed.

A total of 403 cycle spaces are proposed for the residential element well as 17 spaces for the commercial uses, which exceeds this requirement. The GLA note that provision is not in line with London Cycle Design Standards and require design amendments prior to Stage 2 referral. However, following comments from the Council's highways section, the layout and space of cycle stands has

been revised to better meet London Cycle Design Guidance standards with more cycle spaces provided outside of buildings. In any event, a condition is applied to require approval of the cycle parking layouts prior to commencement.

The GLA requires detail of how the cycle parking will be distributed including access arrangements to ensure it meets London Cycling Design Standards. It further notes that provision needs to include a minimum of 20% Sheffield type stands and 5% to cater for larger or adapted cycles. Conditions are sought to approve cycle parking details and a Parking Design and Management Plan.

Some transport related issues were also raised by the Design Review Panel. These are set out below along with the applicant's response.

- Should provide an additional pedestrian crossing across Kensington Road to align with the new site access and the listed buildings: *Comment* - this is not feasible and the Council is already providing a pedestrian crossing.
- Concerns on areas of under-croft parking and need further detail on how these spaces are resolved; *Comment*: Secured by Design have reviewed the proposal and are comfortable with the layout and access to under croft parking areas.
- Details needed of how the parking zones will be articulated, including integration of planting, surface materials and bay markings; *Comment*: this will be covered in the landscaping plan and a condition requires approval of these details.
- Need details of cycle parking and storage for cargo bikes should be considered; *Comment*: a condition requires approval of cycle parking layout and details.
- Full access for refuse vehicles into the centre of the site will result in conflicts and should consider options to limit vehicles within this area: *Comment*: movements across the site will be limited to servicing vehicles only with two separate parking areas on the site edges to minimise vehicle movement within the central area.

Based on the above, with the appropriate conditions and S106 contributions, the proposed development would make the proposal acceptable in terms of section 9 of the National Planning Policy Framework (2021), and policies T4, T5, T6 and T6.1 of The London Plan (2021).

Environmental Pollution

The site lies near the very busy A40 road and this could give rise to noise and air quality impacts for the proposed residential units.

A Noise Impact Assessment submitted with the application concludes that no further mitigation measures should be required in order to protect the proposed habitable spaces from external noise. It also notes that acceptable internal noise levels to dwellings would be achieved with appropriate glazing specifications.

Regulatory Services have reviewed the submitted Noise Assessment and note that the site is exposed to traffic noise from local roads and the A40 and junction with the slip road; many bedrooms adjoin neighbouring kitchen/living/dining rooms/staircase and communal corridors and above/adjoining bin/cycle stores and ground floor plant rooms, with potential to cause adverse living conditions. Despite this, no objections are raised subject to various noise related conditions being applied including sound

insulation of the building envelope, insulation between noise sensitive rooms in neighbouring flats, separation of communal uses and facilities from flats, enhanced sound insulation of lifts, an extraction and odour control system for non-domestic kitchens, sound insulation of commercial/industrial buildings, sound insulation and anti-vibration measures/ for the gym, noise levels emitted from plant, anti-vibration mounts and approval of a Demolition Method Statement and Construction Management Plan. These conditions would be applied if permission is recommended.

The GLA Stage 1 report notes that Noise Impact Assessment concludes that daytime and night-time noise levels for occupiers of the proposed development could be acceptable subject to installation of the recommended glazing specification and limits on the openable area for bedroom windows. They request the recommendations of the Noise Impact Assessment Report be secured by condition. This has been applied.

An Air Quality Assessment accompanies the application. This concludes that the development would be air quality neutral in terms of building and transport emissions. It also indicates that no special mitigation measures are required to mitigate poor air quality from vehicle emissions (NO₂ and PM₁₀) at the proposed flats.

The Council's Air Quality officer has raised no objections subject to conditions requiring approval of a Ventilation Strategy Report and an Air Quality and Dust Management Plan, and restrictions on Non-Road Mobile Machinery, as well as a S106 contribution of £22,800 towards air quality monitoring.

The GLA Stage 1 Report notes that the Air Quality Assessment could be compliant with the London Plan if additional information is provided relating to the London Borough of Ealing Air Quality Management Area; dust risk assessment; emergency generators; monitoring and monitoring sites; pollutants; IAQM significance criteria; and updated energy strategy to reflect air quality neutral assessment.

In relation to contaminated land, Regulatory Services consider that contamination may be present at the site which, due to the proposed redevelopment to residential use, needs investigation. If permission is recommended, conditions will be applied with regard to site investigation, remediation and verification.

Ecology

London Plan Policy G6 states that development proposals should aim to secure biodiversity net gain.

The site is located partially within the Smith's Farm, Marnham Fields, Bridge Farm Open Space and Greenfield Lagoons Site of Importance for Nature Conservation (SINC), identified as being of Borough Importance Grade I. The Northolt/Greenford Countryside Park SINC lies adjacent to the west but separated from the site by a busy local road and the London's Canals SINC lies 200m to the east.

An Ecology Impact Assessment accompanies the application. It notes the site mainly contains buildings, modified grassland, lines of trees in poor condition and scrub and two stands of Japanese knotweed. This report found no protected, or Habitats of Principal Importance or locally important floral species within the site. No evidence of bats was found and the site is indicated to have negligible bat roosting potential.

It concludes that with the mitigation measures proposed, and a bat mitigation licence in place, the development can proceed with no significant residual effects on habitats and protected or notable species. It also recommends various measures to enhance the value of the site for wildlife and achieve biodiversity net gain including:

- plant a native hedgerow along the northern and eastern site boundaries;
- install bird boxes and / or sparrow terraces on suitably mature trees and / or new buildings;
- install bat boxes on suitably mature trees and / or new buildings towards the east of the site;
- provide two insect houses in sheltered, warm locations;
- provide green roofs or green walls on proposed buildings within the site, including cycle or bin stores;
- incorporate rain gardens within hardstanding and parking bays;
- incorporate Sustainable Drainage Systems within the development.

The GLA Stage 1 report requires, prior to Stage 2 referral, exploration of a wider softer transition between the SINC and the hard landscaping and how this has been incorporated into the scheme. A Construction Environment Management Plan (CEMP) should also be provided to set out how the risk of pollution related impacts on ecology at the construction stage will be avoided and mitigated and secured by condition requiring approval prior to construction. This condition has been applied.

A biodiversity net gain report accompanies the application. This indicates there would be an increase of 16.39 habitat units achieved via the creation of mixed scrub, grassland habitats and planting of native species hedgerows throughout the proposed development. There would also be an increase of 2035% in habitat biodiversity units and a 36285% increase in hedgerow units. On this basis, the proposal would be acceptable in terms of ecology and accord with London Plan Policy G6.

A condition is applied to ensure the Ecology Impact Assessment recommendations are implemented.

Trees

London Plan Policy G7 requires development proposals to ensure that, wherever possible, existing trees of quality are retained and, if it is imperative that trees have to be removed, there should be adequate replacement based on the existing value of the benefits of the trees removed.

The application is accompanied by an Arboricultural Implications Report. This identifies 39 existing trees within the site, mostly around the periphery. It assesses 12 of these trees as category B, 21 as category C and 6 as category U. It states that 17 trees would be removed to facilitate the proposed development, all but one of which are in Category C or U. The report notes that this loss of trees can be addressed by planting of new trees across the site and that the landscaping proposals include planting of 115 trees of predominantly native species. The applicants state that the CVAT value of the new trees would substantially exceed that of the trees to be removed. It concludes that the development would not have any significant impact on trees of importance to the amenity of the locality or on the quality of the local landscape.

The Council's Tree officer has objected to the proposals on the basis that the proposed trees would not be tall enough in most cases to soften the buildings and there is insufficient space to plant the size of trees required to do this. There is also a concern that the size of trees required to screen the buildings would significantly shade nearby gardens and that not enough has been done to incorporate the

scheme into the landscape adjoining Northala Fields. However, to address this concern, conditions have been applied to require approval of details of tree planting and tree protection measures. With these conditions, the proposals should comply with London Plan Policy G7.

Energy/Sustainability

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

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

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

Due to the significant reduction in the carbon intensity of grid electricity, CHP can no longer be considered as a solution for reducing CO₂ emissions, and there is no available "Clean" district heat network (DHN) nearby. Air Source Heat Pump distribution loops (ASHP) are proposed for each of the blocks of flats, with dwelling water source heat pumps (WSHP) to provide space heating and domestic hot water. Also proposed are five photo-voltaic arrays on the block roofs with a combined capacity of approximately 115 kWp.

The applicant has submitted an energy statement, setting out how the development would reduce carbon dioxide emissions. This has been reviewed by the Council's Energy & Sustainability advisor who supports the proposed energy/sustainability strategy, which is all electric with no gas infrastructure on-site. The Strategy has been assessed against the draft SAP10 benchmark and follows the standard energy hierarchy of "Lean, Clean, Green" as required by London Plan policies SI2 and SI3, and Ealing Council's Development Management DPD. An overheating/cooling assessment has been submitted and complies with relevant guidance.

With these measures, overall site wide CO₂ emissions would be cut by at least 89.83%. A shortfall of 535 tonnes CO₂ (over 30 years) in the zero-carbon would be mitigated through an "offset" S106 payment at £95 per tonne to the Council of £50,816.

In line with London Plan Policy SI2, monitoring of the PV arrays and the communal Air Source Heat Pump loops for a period of 4 years would be required to evaluate their performance. Monitoring of 8 of the domestic heat pumps would also be required. This monitoring would require a S106 contribution of £16,462.

Conditions are applied to require implementation of the recommended overheating mitigation measures, details of Post-construction energy equipment and energy use monitoring.

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

Whole Life Carbon

London Plan Policy SI 2 requires major development proposals such as this to calculate and reduce whole life-cycle carbon emissions to fully capture the development's carbon footprint.

A whole life-cycle carbon assessment has been submitted with the application. The Council's Energy Adviser confirms that the development is compliant with the GLA Benchmark targets and exceeds the Aspirational targets. Modules A1-A5 should achieve 464 KgCO₂e/m², and B1-C4 (excluding B6/B7) 295 KgCO₂e/m², with a total carbon emissions baseline scenario (over 60 years) of 758 KgCO₂e/m² (including module D and sequestration benefits). A condition has been applied requiring submission of a post-construction Whole Life-Cycle Carbon (WLC) Assessment to the GLA prior to occupation and requiring specified commitments to be implemented.

The GLA Stage 1 report notes that whole life-cycle carbon assessment does not yet comply with London Plan Policy SI 2 and further information is required. This will be provided prior to Stage 2 referral.

Circular Economy

Policy S17 of the London Plan requires a Circular Economy Statement to accompany major development applications such as this. This should set out targets for minimising demolition waste, excavation and construction waste and for recovery of building materials.

A Circular Economy Statement has been submitted with this application. The Council's Energy adviser confirms that the development will be compliant with the London Plan targets of diverting 95% of demolition/construction waste from landfill, putting 95% of excavation materials to beneficial on-site use, and supporting the diversion of 65% of Operational Waste from landfill by 2030.

The GLA Stage 1 report indicates that the Circular Economy Statement does not yet comply with London Plan Policy SI 7 and further information is required. This will be provided prior to Stage 2 referral. As requested by the GLA, a condition is applied to require submission of a Circular Economy Statement Post Completion Report prior to completion of construction of each phase and requiring specified commitments to be implemented.

Crime Prevention

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

The Metropolitan Police Design Out Crime team has assessed the proposed development and sees no reason why it could not achieve a Secured by Design Accreditation. Nevertheless, a planning condition has been requested requiring compliance with Secure by Design Standards. The Metropolitan Police have also requested a S106 financial contribution to mitigate the additional impacts of this development on police infrastructure and the applicant has agreed this.

Refuse & Recycling Storage

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

For the proposed 220 flats, the total refuse/recycling storage provision required would be broadly equivalent to 22,900L of refuse bins and 22,900L of recycling bins.

It is proposed that each block of flats would have its own refuse storage area within the building ground level and beside the main entrance. A total of 55 x 1,100L bins and 5 x 660L bins is proposed. This would comprise 6 x 1100L bins in Block A, 6 x 1100L bins in Block B, 11 x 1100L bins in Block C, 10 x 1100L bins in Block D, 8 x 1100L bins and 5 x 660L bins in Block E, 5 x 1100L bins in Block F and 4 x 1100L bins in Block G. This provision would be adequate to accord with Policy SI7.

The northern access road would allow refuse/delivery vehicles to move around the site through the shared surface landscaping. Each block would have a dedicated refuse store located for convenient collection. Two turning heads are provided within this landscaped area allowing for vehicles to arrive and leave in forward gear.

To ensure that the proposed refuse arrangements are managed properly, a condition that requires the submission of a servicing management plan is applied to secure coordinated servicing of the development, including refuse collection.

Drainage and Flood Risk

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

A Flood Risk Assessment and Drainage Strategy have been submitted and concludes that:

- the proposed development site is in Flood Zone 1 and is at very low risk of surface water flooding;
- the proposed dwellings will not be at risk of damage from flooding events;
- foul water can be discharged to the Thames Water foul sewer in Farrier Road to the south of the site via new adopted sewers;
- SuDS measures will be incorporated including green roofs, rainwater gardens to collect runoff from the access roads and permeable paving;
- attenuation tanks and permeable paving structures will store surface water runoff before discharge to the existing Thames Water surface water sewers in Kensington Road and Horse Shoe Crescent;
- the attenuation tanks have been sized to ensure sufficient storage for events up to and including the 1 in 100 year storm plus 40% climate change allowance;
- the total discharge from the site will be 5.8 l/s which is the estimated existing greenfield runoff rate.

Affinity Water indicates that the site not within Environment Agency defined groundwater Source Protection Zone or close to its water abstractions. It requires ground investigations prior to any piling or other excavations below the chalk groundwater and requests the development include water efficient fixtures and fittings, rainwater harvesting and grey water recycling. The water company also needs to be consulted on the potential for water mains running through or near the development site.

Thames Water notes the development would be within 15m of a strategic sewer so a piling condition is required. It raises no objection with regard to foul water sewerage network infrastructure capacity, or regarding surface water drainage provided the developer follows the sequential approach to the disposal of surface water.

The Drainage Strategy also confirms that rainwater harvesting was considered to reuse surface water runoff within the buildings. However, it notes that, with the green roofs capturing the majority of rainfall from the lower return period storms, the harvesting tanks would be empty for the majority of the time without extreme storms contributing. In addition, it argues that rainwater harvesting tanks should not be included in the assessment of attenuation required to store runoff from a development as there is no guarantee that the tank will be sufficiently empty to receive another storm and for these reasons they have been discounted.

The Council's Flood risk/drainage officer has not provided comments on the proposals. However, the GLA Stage 1 report notes that the proposed development does not comply with London Plan Policy SI 12 since no assessment of the risk of groundwater or sewer flooding has been undertaken, and further information is required prior to Stage 2 referral.

The GLA supports the drainage strategy but further information on attenuation estimates should be provided prior to Stage 2. In terms of SuDS, the proposals for green roofs and rain gardens are supported but rainwater harvesting and blue roofs should be provided to satisfy the requirements of London Plan Policy SI 13. This information will be provided prior to the GLA Stage 2 process.

However, the proposal does not comply with London Plan Policy SI 5 as no information has been provided regarding water efficiency for the residential components of the development or how the water consumption targets are to be achieved. This information is to be provided prior to Stage 2.

Regeneration, Employment & Training

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

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

- a financial contribution of £385,000 towards apprenticeship/employment placement;
- 15 apprenticeships over the project's lifetime;
- 20 work experience opportunities
- 10 job starts
- a penalty of £25,000 per apprenticeship opportunity not filled;
- schools engagement activity involving 40 school/ college visits;
- 40 school/ college workshops over 3 years.

These obligations will be secured via a S106 Agreement.

S106 Contributions/Obligations

The following S106 contributions and obligations are required to mitigate the impacts of the development:

- provision of 111 affordable dwellings comprising 71 London Affordable Rent units and 40 Shared Ownership units;
- a financial contribution of £542,023 towards improvements to local schools;
- a financial contribution of £500,000 towards local healthcare provision;
- a financial contribution of £57,000 towards improving paths, bridge and connections with the surrounding area;
- a financial contribution of £100,000 towards improvements to children's playspace;
- a financial contribution of £171,000 towards improvements to Smith's Farm open space;
- a financial contribution of £100,000 towards improvements to Northolt town centre;
- a financial contribution of £250,000 towards indoor and outdoor sports provision;
- a financial contribution of £50,816 to offset carbon emissions;
- a financial contribution of £16,462 for Renewable and Low Carbon Energy (&CO2) monitoring;
- a financial contribution of £22,800 towards air quality monitoring;
- a financial contribution of £50,000 towards an accident remedial scheme on Kensington Road
- a financial contribution of £40,000 towards parking and waiting restrictions near the development;
- a financial contribution of £30,000 towards speed tables at junctions near the development
- a financial contribution of £50,000 towards cycle infrastructure improvements near the development;
- a financial contribution of £20,000 towards bus stop improvements near site;
- a financial contribution of £40,000 towards pedestrian infrastructure improvements near the development;
- a financial contribution of £3,000 for Travel Plan Monitoring;
- a financial contribution of £16,339 to mitigate additional impacts on police infrastructure;
- a financial contribution of £30,000 towards an Apprentice and Local Labour Scheme and provision of 15 apprenticeships, 10 job starts, 20 work experience opportunities, with a penalty of £25,000 per apprenticeship opportunity not filled and school engagement work involving 40 school/ college visits and 40 school/ college workshops over 3 years;
- Travel Plan monitoring costs;

- a restriction on residents' car parking permits within surrounding Controlled Parking Zones and any future CPZs in the area;
- Participation in an Apprentice and Placement Scheme, which shall provide opportunities across the development, including the construction, design and post construction management of the development. Details of the Apprentice and Placement Scheme including the number of placements details shall be agreed with the Council; this is in addition to the financial contribution towards an Apprentice and Local Labour Scheme;
- Implementation of the Travel Plan;
- no occupation of the development unless and until the Carbon Dioxide Off Setting Sum of £16,462 has been paid to the Council where the Energy Assessment shows that the Carbon Dioxide Emission Target cannot be met on site;
- payment of an 'Additional Carbon Offset Contribution' to mitigate any shortfall in the carbon reduction achieved by the proposed "Clean/Green" heat pump and PV equipment;
- All contributions to be index linked;
- Payment of the Council's reasonable legal and other professional costs in preparing and completing the agreement.

Such contributions are required to mitigate impacts of the proposed development and make it acceptable and have been agreed with the applicant.

Community Infrastructure Levy (CIL)

Ealing is a collection authority on behalf of the Mayor of London. This is charged at £60 per sqm since 1/4/19 subject to Indexation. The proposed development involves 220 residential units, and a large increase in residential and commercial floorspace. However, a proportion of this would be in affordable dwellings which are exempt from CIL. This would equate to some £570,000 but the exact amount of any liability will be calculated by the CIL Officer who can be contacted at cilcollections@ealing.gov.uk.

Fire Safety

Policy D12 of the London Plan requires major applications to be accompanied by a fire statement demonstrating how the development would achieve the highest standards of fire safety. A Fire Statement prepared by a suitably qualified third-party assessor has been submitted.

The Health and Safety Executive commented that the connection of the single staircase in Block E (core E1) with ancillary accommodation is not appropriate and design changes are necessary to provide alternative, separated access and egress routes from such areas. Revisions to the scheme have been made to resolve this issue.

This Fire Statement has also been reviewed in the GLA Stage 1 Report which indicates that, Prior to Stage 2, the fire statement should be reviewed to address the requirements of the London Plan and the Fire Safety draft LPG.

Conclusion

The proposed development would be in the Green Belt. However, this is a brownfield site that has been allocated for residential-led development in the emerging local plan and a range of very special circumstances apply which override any harm to the Green Belt.

The development will provide 220 dwellings, which would make a significant contribution to meeting housing demand, including 111 affordable units, against a background where the Council is unable to demonstrate a 5 year housing land supply. Almost 60% of flats would be larger, family sized units.

It will also provide 408 sq m of Class E space in the existing farmhouse and barn, providing some local jobs, a viable use for a locally listed building and a local community and visitor facility in an area lacking these. In addition, it would provide improved public access through the site and to adjoining open space, including a new crossing on Kensington Road. Various planting, landscaping and biodiversity enhancements are also proposed to nearby open land.

While there would be a loss of employment land, much of the site is used for car sales and adequate justification for this loss has been provided as required by Ealing DPD Policy 4A and the principle of residential development has previously been accepted on the site.

In addition, the scale and design of the proposed development are considered acceptable with its surroundings and not have unacceptable visual impacts on nearby open land. The scheme would also provide adequate living conditions including provision of amenity space, landscaping and cycle storage and deficiencies in children's playspace are mitigated by contributions to off-site provision.

Various measures are proposed to enhance the value of the site for wildlife and achieve biodiversity net gain and 115 new trees would be planted, enhancing what is currently an untidy site covered in hardstanding, poor quality buildings and parked vehicles.

No unacceptable impacts on the amenity of nearby dwellings have been identified. Traffic impacts of the development are estimated to be less than from the existing use, with much fewer heavy vehicles. With appropriate conditions and S106 contributions, the proposed development would be acceptable in transport terms.

Approval is therefore recommended subject to a range of conditions and S106 and S278 obligations.

Human Rights Act

You are referred specifically to Article 8 (right to respect for private and family life), Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for refusal 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 refusal is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

Public Sector Equality Duty

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 refuse planning permission in this case would not have a disproportionately adverse impact on a protected characteristic.

APPENDIX 1: CONDITIONS

1. Time Limit 3 years - Full Permission

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

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

2. Phasing Plan

Prior to any development on the site the developer will submit a detailed site phasing plan for approval in writing by the Local Planning Authority. The development hereby approved shall be implemented in according to the approved phasing plan.

Prior to the commencement of any phase, a plan showing the location of that phase shall be submitted to and approved in writing by the Local Planning Authority, which plan may be varied with the prior written approval of the Local Planning Authority.

Reason: To enable the development to be carried out in a phased manner.

3. Approved Plans and Documents

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

395-PL-011 Rev 01 Existing Block Plan, 395-PL-010 Rev 01 Site Location Plan, 395-PL-040 Rev 01 Existing Site Location AA, 395-PL-041 Rev 00 Existing Site Sections BB and CC, 395-PL-100 Rev 02 Proposed Block Plan, 395-PL-101 Rev 07 Proposed Site Plan, 395-PL-200 Rev 03 Block A - Proposed Ground Floor Plan, 395-PL-201 Rev 03 Block A - Proposed First Floor Plan, 395-PL-202 Rev 03 Block A - Proposed Second Floor Plan, 395-PL-203 Rev 03 Block A - Proposed Third Floor Plan, 395-PL-205 Rev 03 - Block A - Proposed Roof Plan 395-PL-218 Rev 03 - Block D - Proposed Ground Floor Plan, 395-PL-219 Rev 02 - Block D - Proposed First Floor Plan, 395-PL-220 Rev 02 - Block D - Proposed Second Floor Plan, 395-PL-221 Rev 02 - Block D - Proposed Third Floor Plan, 395-PL-222 Rev 02 - Block D - Proposed Fourth Floor Plan, 395-PL-223 Rev 02 - Block D - Proposed Roof Plan, 395-PL-228 Rev 04 - LLB and Outbuilding - Proposed Ground Floor Plan, 395-PL-229 Rev 02 - LLB and Outbuilding - Proposed First Floor Plan, 395-PL-230-02 Rev 02 - LLB and Outbuilding - Proposed Roof Plan, 395-PL-231 Rev 03 - Blocks B and C - Proposed Ground Floor Plan, 395-PL-232 Rev 02 - Blocks B and C - Proposed First Floor Plan, 395-PL-233 Rev 02 - Blocks B and C - Proposed Second Floor Plan, 395-PL-234 Rev 02 - Blocks B and C - Proposed Third Floor Plan, 395-PL-235 Rev 02 - Blocks B and C - Proposed Fourth Floor Plan, 395-PL-236 Rev 01 - Blocks B and C - Proposed Fifth Floor Plan, 395-PL-237-01 - Blocks B and C - Proposed Sixth Floor Plan, 395-PL-238 Rev 01 - Blocks B and C - Proposed Roof Plan, 395-PL-239 Rev 04 - Blocks E and F - Proposed Ground Floor Plan, 395-PL-240 Rev 03 - Blocks E and F - Proposed First Floor Plan, 395-PL-241 Rev 02 - Blocks E and F - Proposed Second Floor Plan, 395-PL-242 Rev 02 - Blocks E and F - Proposed Third Floor Plan, 395-PL-243 Rev 02 - Blocks E and F - Proposed Fourth Floor Plan, 395-PL-244 Rev 01 Blocks E and F - Proposed Fifth Floor Plan, 395-PL-245 Rev 01 Blocks E and F - Proposed Sixth Floor Plan, 395-PL-246 Rev 01 Blocks E and F - Proposed Roof Plan, 395-PL-247 Rev 02 Block G - Proposed Ground Floor Plan, 395-PL-248 Rev 01 Block G - Proposed First Floor Plan, 395-PL-249 Rev 01 Block G - Proposed Second Floor Plan, 395-PL-250 Rev 01 Block G - Proposed Third Floor Plan, 395-PL-251 Rev 01 Block G - Proposed Roof Plan, 395-PL-300 Rev 01 Block A - Proposed West Elevation, 395-PL-301 Rev 01 Block A - Proposed East Elevation 395-PL-302 Rev 01 Block A - Proposed North and South Elevations, 395-PL-309 Rev 01 Block

D - Proposed West Elevation 395-PL-310 Rev 01 Block D - Proposed East Elevation, 395-PL-311 Rev 01 Block D - Proposed North and South Elevations, 395-PL-315 Rev 02 LLB Proposed Elevations 1, 395-PL-316-00 LLB Proposed Elevations 2, 395-PL-320 Rev 01 Proposed Combined West Elevation, 395-PL-321 Rev 02 Proposed Combined South Elevation, 395-PL-322 Rev 02 - Proposed Combined East Elevation, 395-PL-323 Rev 01 - Proposed Combined North Elevation, 395-PL-324 Rev 01 - Proposed Combined Internal West Elevation, 395-PL-325 Rev 01 - Proposed Combined Internal South Elevation, 395-PL-326 Rev 01 - Proposed Combined Internal East Elevation, 395-PL-327 Rev 01 - Proposed Combined Internal North Elevation, 395-PL-328-00 - Blocks B and C - Proposed South Elevation, 395-PL-329 Rev 01 - Blocks B and C - Proposed East Elevation, 395-PL-330-01 Rev 01 - Blocks B and C - Proposed North Elevation, 395-PL-331-01 Rev 01 - Blocks B and C - Proposed Sectional North Elevation, 395-PL-332 Rev 01 - Blocks B and C - Proposed West Elevation 395-PL-333 Rev 01 - Blocks B and C - Proposed Sectional West Elevation, 395-PL-334-00 - Blocks E and F - Proposed Northeast Elevation, 395-PL-335-00 - Blocks E and F - Proposed East Elevation, 395-PL-336-00 - Blocks E and F - Proposed South Elevation, 395-PL-337-00 - Blocks E and F - Proposed West Elevation, 395-PL-338-00 - Blocks E and F - Proposed Sectional North Elevation, 395-PL-339 Rev 01 - Blocks E and F - Proposed Southwest Elevation, 395-PL-339 Rev 01 - Blocks E and F - Proposed Southwest Elevation, 395-PL-335 Rev 01 - Blocks E and F - Proposed East Elevation, 395-PL-341-00 - Block G - Proposed West and Southwest Elevations 395-PL-342-00 - Block G - Proposed Southeast Elevation, 395-PL-343-00 - Block G - Proposed Northeast and North Elevations, 395-PL-350 Rev 02 Proposed Street scene - Kensington Road,

Environmental Statement (Contamination Report) by Lanmor Consulting (January 2022); Air Quality Assessment by DJC Housing Consultants (March 2023); Daylight and Sunlight Report by Lumina (February 2023); Design and Access Statement by WaM Architecture (March 2023); Heritage Statement by Asset Heritage Consulting (February 2023); Condition Report on Farmhouse and adjacent outbuildings by Stone Rose (undated); Drainage Strategy and Flood Risk Assessment by Lanmor Consulting (March 2023); Ecological Impact Assessment by David Archer Associates (February 2023); Sustainability & Energy Statement by Bluesky Unlimited (March 2023); Planning and Affordable Housing Statement by Howarth Homes Plc (March 2023); Noise Impact Assessment Report by KP Acoustics (February 2023); Statement of Community Involvement by Polity ((March 2023); Transport Statement by Lanmor Consulting (February 2023); Travel Plan) by Lanmor Consulting (February 2023); Construction Logistics Plan by Lanmor Consulting (March 2023); Delivery and Servicing Management Plan by Lanmor Consulting (February 2023); Arboricultural Implications Report and Landscape Assessment by David Archer Associates (January 2022); Planning Gateway One Fire Statement by London Bridge Associates Ltd (February 2023); Fire Statement by London Bridge Associates Ltd (February 2023); Overheating Assessment by Queensbury Design Ltd (March 2023); GLA Carbon Emissions Reporting Spreadsheet, Circular Economy Statement by Cooper Homewood (March 2023); Whole Life Carbon Assessment by Cooper Homewood (March 2023); Biodiversity Impact Calculation Report by Syntegra (December 2022), Market Demand Report by Vokins Chartered Surveyors (November 2022), Landscape Addendum by WaM, Schedule of Accommodation Rev 01 by WaM (June 2023), Final Biodiversity Metric Calculations by David Archer Associates, Play Strategy by Udal Landscape Architecture (June 2023), Visual Impact Assessment (July 2023), Alternative Sites Assessment (July 2023).

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

4. Details of Materials - Building

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

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

5. Hard/ Soft Landscaping and Boundary Treatment

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

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

6. Landscape Management Plan

Details of a Landscape 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.

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

7. Play equipment

Details of design, layout and provision of play equipment within the play areas 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 as approved 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 ELV 3.5 and 7D of the Ealing Development Management Development Plan Document (2013), policy S4 of the London Plan (2021), the London Plan SPG on Children's Play and Recreation, and the National Planning Policy Framework.

8. Demolition Method and Construction Management

Prior to commencement of the development, a demolition method statement/ construction management plan shall be submitted to the Council for approval in writing. Details shall include control measures for:

- noise and vibration (according to Approved CoP BS 5228-1 and -2:2009+A1:2014),
- dust (according to Supplementary Planning Guidance by the GLA (2014) for The Control of Dust and Emissions during Construction and Demolition),
- lighting ('Guidance Note 01/20 For The Reduction Of Obtrusive Light' by the Institution of Lighting Professionals),
- delivery locations,
- hours of work and all associated activities audible beyond the site boundary restricted to 0800-1800hrs Mondays to Fridays and 0800 -1300 Saturdays (except no work on public holidays),
- neighbour liaison, notifications to interested parties and
- public display of contact details including accessible phone numbers for persons responsible for the site works for the duration of the works.

Reason: To protect the amenity of neighbouring occupiers and to ensure adequate highway and site safety in accordance with policies 1.1(e), 1.1(j) and 2.1(c) of the Ealing Core Strategy (2012), policies S11, T4, T6 and D14 of the London Plan (2021), the National Planning Policy Framework (2021), 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.

9. Cycle Parking

Prior to commencement of the superstructure of the development, details of cycle parking provision with adequate spacing between cycle stands shall be submitted to the Council for approval in writing. The approved layouts shall be fully implemented in accordance with Council standards and made operational before the first occupation of the development, and permanently retained thereafter.

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

10. Travel Plan

Notwithstanding any Travel Plan submitted with the application, a revised Green Travel Plan designed to manage the transport needs of the occupiers of the development, including measures to minimise car usage and promote alternative modes of transport, shall be submitted to and approved by the Local Planning Authority before the occupation of each phase of the development, and the approved Green Travel Plan shall be fully implemented in compliance with the approved document.

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

11. Delivery/ Servicing Plan

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

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

12. Piling

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

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

13. Energy and CO₂

- a) Prior to construction completion and occupation, the Development shall implement and maintain, and in the case of energy generation equipment confirm as operational, the approved measures to achieve an overall sitewide reduction in regulated CO₂ emissions of at least 89.83% (equating to 157.48 tonnes of CO₂ per year) beyond Building Regulations Part L 2021 and using SAP10 (or later version) conversion factors. These CO₂ savings shall be achieved through the Lean, Clean, Green Energy Hierarchy as detailed in the approved Energy Statement prepared by Bluesky Unlimited March 2023 (v1) including:
 - i. Lean, energy efficiency design measures to achieve an annual reduction of at least 10.60% equating to at least 18.58 tonnes in regulated carbon dioxide (CO₂) emissions over BR Part L 2021.
 - ii. Green, renewable energy equipment including the incorporation of photovoltaic panels with a combined total capacity of approximately 115 kWp, and Air and Water Source Heat Pumps to achieve a combined annual reduction of at least 79.23%, equating to 138.90 tonnes, in regulated carbon dioxide (CO₂) emissions over Part L 2021.
 - iii. Seen, heat and electric meters installed to monitor the performance of the PV and the carbon efficiency (SCOP) of the heat pump systems (including the heat generation and the electrical parasitic loads of the heat pumps) in line with the Council’s monitoring requirements.

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

- c) On completion of the installation of the renewable energy equipment copies of the MCS certificates and all relevant commissioning documentation shall be submitted to the Council.
- d) The development shall incorporate the overheating mitigation measures detailed in the dynamic Overheating Analysis by Queensberry Design in March 2023 (v1). Any later stage version shall be compliant with CIBSE Part O (TM59/Guide A) and modelled against the TM49 DSY1 (average summer) weather data files.
- e) Within three months of the occupation/first-use of that phase of the development a two-page summary report prepared by a professionally accredited person comparing the “as built stage” TER to BER/DER figures against those in the final energy strategy along with the relevant Energy Performance Certificate(s) (EPC) shall be submitted to the Council for approval.

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

14. Post construction energy equipment monitoring

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

- a) Enter into a legal agreement with the Council to secure a S106 financial contribution, or alternative financial arrangement, for the post-construction monitoring of the renewable/low carbon technologies to be incorporated into the development and/or the energy use of the development as per energy and CO₂ condition(s).
- b) Upon final construction of the development, or relevant phases of the development, and prior to occupation, the agreed suitable devices for monitoring the performance/efficiency of the renewable energy equipment shall be installed. The monitored data shall be automatically submitted to the Council at daily intervals for a period of four years from occupation and full operation of the energy equipment. The installation of the monitoring devices and the submission and format of the data shall be carried out in accordance with the Council’s approved specifications as indicated in the Automated Energy Monitoring Platform (AEMP) information document. The developer must contact the Council’s chosen AEMP supplier (Emergence Ltd) on commencement of construction to facilitate the monitoring process.
- c) Upon final completion of the development and prior to occupation of that phase of the development, the developer must submit to the Council proof of a contractual arrangement with a certified contractor that provides for the ongoing, commissioning, maintenance, and repair of the renewable energy equipment for a period of four years from the point that the building is occupied and the equipment fully operational. Any repair or maintenance of the energy equipment must be carried out within one month of a performance problem being identified.

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

15: 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) Prior to demolition of existing buildings on the site, the applicant shall 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 of that phase of the development 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.

16: Whole Life-Cycle Carbon Assessment

- a) 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.

- b) The Development shall aim to implement the measures identified in the WLC Assessment prepared by Cooper Homewood in March 2023 (v3). Modules A1-A5 should achieve 464 KgCO₂e/m², and B1-C4 (excluding B6/B7) 295 KgCO₂e/m², with a total carbon emissions baseline scenario (over 60 years) of 758 KgCO₂e/m² (including sequestration and module D benefits).

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

17: Circular Economy

- a) Prior to completion of construction of each Phase of the 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.
- b) Specific commitments detailed in the Circular Economy statement produced by Cooper Homewood in March 2023 (v2), or any later approved version, should be implemented including; diverting 95% of construction waste from landfill, putting 95% of excavation materials to beneficial on-site use, and supporting the London Plan target of diverting 65% of Operational Waste from landfill by 2030.

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

18. Sustainable Design and Construction

Prior to first occupation of the development the sustainability measures detailed in the approved Sustainability & Energy Statement by Bluesky Unlimited (March 2023) 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 the Mayor's Sustainable Design and Construction SPG.

19. Water Efficiency

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

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

20. Security features

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

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

21. Transport and/or industrial noise sources

Prior to commencement of the superstructure of each phase of the development, details shall be submitted to the Council for approval in writing, of 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. Details of best practicable mitigation measures for external amenity spaces shall also be provided and implemented, as necessary. Details shall confirm that noise limits specified in BS8233:2014 will not be exceeded. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

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

22. External noise from machinery, extract/ ventilation ducting, mechanical gates, etc.

Prior to the commencement of the superstructure of each phase of the development, details of the external rating noise level emitted from all plant/ machinery/ equipment/ducting/air in- and outlets/mechanical installations, together with mitigation measures as appropriate shall be submitted to the Local Planning Authority for approval in writing. The measures shall ensure that the external rating noise level LAeq emitted will be lower than the lowest existing background sound level LA90 by 10dBA at the most noise sensitive receiver locations at the development site and at surrounding premises. The assessment shall be made in accordance with BS4142:2014 +A1 2019, with all plant/equipment operating together at maximum capacity. Where required, a post installation sound assessment shall be submitted to the Local Planning Authority for approval in writing. The assessment shall be carried out to confirm compliance with the noise criteria and shall include additional steps to mitigate noise as necessary.

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

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

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

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

24. Separation of noise sensitive rooms in neighbouring flats

Prior to commencement of the superstructure of each phase of the development, 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 e.g. bedrooms adjoining/above/below kitchen/living/dining/bathroom 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 is not adversely affected by vibration or noise, in accordance with policy 1.1(j) of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management Development Plan Document (2013), policy D14 of the London Plan (2021), the National Planning Policy Framework (2021) and Interim guidance SPG 10 'Noise and Vibration'.

25. Separation of communal uses and facilities from dwellings

Prior to commencement of the superstructure of the phase of the development 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 e.g. bedrooms adjoining/above/below kitchen/living/dining/bathroom 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: In the interests of the living conditions of the occupiers of the above residential premises, in accordance with Interim Supplementary Planning Guidance 10, policies 1.1(j) of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management DPD (2013), policy D14 of the London Plan (2021), and the National Planning Policy Framework (2021).

26. Extraction and Odour Control system for non-domestic kitchens

Prior to commencement of the superstructure of each phase of the development, details shall be submitted to the Council for approval in writing, of an odour risk assessment (according to 2018 EMAQ

Guidance) and of odour abatement equipment and extract system, including operational details and maintenance schedule, the height of the extract duct, with vertical discharge outlet, without cowl, at least 1m above the eaves of the main building. Details shall be provided of a reasonable distance of the extract outlet approximately 20 meters from any openable window. Approved details shall be implemented prior to use and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site/surrounding premises is not adversely affected by noise, smell or steam, in accordance with Interim Supplementary Planning Guidance 10, policies 1.1(j) of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management DPD (2013), policy D14 of the London Plan (2021), and the National Planning Policy Framework (2021).

27. Lift Insulation

Prior to commencement of the superstructure of each phase of the development, 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: In the interests of the living conditions of the occupiers of the above residential premises, in accordance with Interim Supplementary Planning Guidance 10, policy 1.1(j) of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management DPD (2013), policy D14 of the London Plan (2021), and the National Planning Policy Framework (2021).

28. Sound Insulation of commercial/ industrial building envelopes

The sound insulation of commercial/industrial building envelopes and of any mitigation measures shall ensure that noise from internal uses, activities and plant is contained within the premises, as assessed according to standards of the Council's SPG10 and criteria of BS8233:2014, at the nearest and most affected noise sensitive premises incl. offices and external amenity spaces. Measures shall be implemented prior to occupation and retained permanently thereafter.

Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise, in accordance with with Interim Supplementary Planning Guidance 10, policy 1.1(j) of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management DPD (2013), policy D14 of the London Plan (2021), and the National Planning Policy Framework (2021).

29. Sound insulation and anti-vibration measures/Separation of gym from dwellings/sensitive uses

Prior to any construction/ commencement of the development as a gym, an acoustic report shall be submitted to the Council for approval in writing, detailing the following:

- the sound insulation performance of the floor, ceiling and walls separating the gym from adjoining commercial and/or residential premises or parts of the development;
- anti-vibration fittings and/or other mitigation measures required for the isolation of exercise equipment, loudspeakers and floors for use by group exercise classes, weights, machines;
- details to demonstrate that noise from the use of the gym including music, instructor's voices, group exercise classes, activities and use of equipment does not exceed
 - NR25 Lmax(fast) from structure borne / impact noise

- NR20 Leq,5min from general airborne activity noise (including music) within adjoining or nearby premises. The assessment and mitigation measures shall be based on standards of the Council’s SPG10. Approved details shall be implemented prior to use of the gym and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise and vibration, in accordance with with Interim Supplementary Planning Guidance 10, policy 1.1(j) of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management DPD (2013), policy D14 of the London Plan (2021), and the National Planning Policy Framework (2021).

30. Ventilation Strategy

Prior to the commencement of the superstructure of each phase of the development, a Ventilation Strategy Report to mitigate the impact of existing poor air quality for residents shall be submitted to and approved by the Local Planning Authority. The report will contain details for providing fresh air ventilation to habitable rooms on the “Kensington Rd” façade for Blocks A and G, the supply to be provided from the rear of the building at high level. The report shall also include the following information:

- a) Details and locations of the ventilation intake locations of all floors
- b) Details and locations of ventilation extracts locations of all floors

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

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

31. Air Quality and Dust Management Plan

Before the development is commenced, (including demolition and site clearance) an Air Quality and Dust Management Plan (AQDMP) that includes an Air Quality (Dust) Risk Assessment shall be produced in accordance with current guidance The Control of Dust and Emissions during Construction and Demolition, SPG, GLA, July 2014, for the existing site and the proposed development. A scheme for air pollution mitigation measures based on the findings of the report shall be submitted to and approved by the Local Planning Authority prior to the commencement of any works on the site. The plan shall include:

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

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

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

32. Non-Road Mobile Machinery

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

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

33. Contaminated Land Site Investigation

Prior to the commencement of any works on site (other than demolition and site clearance), and based on an approved conceptual site model (contained within an approved desk study phase 1 report) a site investigation (undertaken in accordance with BS1075:2011+A1:2013 and LCRM) shall investigate the site and any previously inaccessible ground. The site conceptual model shall be amended based on the findings of the intrusive site investigation and the risks to identified receptors up dated. This assessment must be undertaken by a competent person, and shall assess any contamination on the site, whether or not it originates on the site. The findings of the site investigation and proposed remedial options shall be submitted to the Local planning authority for approval in writing prior to any remedial works commencing and any development works commencing.

Reason: To ensure the land contamination issues are addressed in accordance with policy 1.1 (j) of the adopted Local Development Framework Core Strategy (2012) and Policy 5.21 of the Ealing Development Management Development Plan (2013).

34. Remediation Scheme

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

Reason: To ensure the land contamination issues are addressed in accordance with policy 1.1 (j) of the Ealing Local Development Framework Core Strategy (2012) and Policy 5.21 of the Ealing Development Management Development Plan (2013).

35. Verification Report

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

Reason: To ensure the land contamination issues are addressed in accordance with policy 1.1 (j) of the Ealing Local Development Framework Core Strategy (2012) and Policy 5.21 of the Ealing Development Management Development Plan (2013).

36. External Lighting

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

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

37. No masts/satellite dishes or external equipment

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

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

38. Refuse Storage

The refuse and recycling storage facilities hereby approved shall be implemented and operational before the first occupation of the residential units and permanently retained thereafter.

Reason: In the interests of the adequate disposal, storage and collection of waste and recycling, to protect the living conditions of occupiers of the area and in the interests of highway and pedestrian safety all in accordance with policies 1.1 (e) and 6.1 of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management Development Plan Document (2013), policy S18 of the London Plan (2021) and the National Planning Policy Framework (2021).

39. Passenger Lifts

All passenger lifts serving the residential units hereby approved shall be fully installed and operational prior to the first occupation of the relevant core of development served by a passenger lift.

Reason: To ensure that adequate access is provided to all floors of the development for all occupiers and visitors including those with disabilities, in accordance with policy 1.1(h) of the Ealing Core Strategy (2012), policy D5 of The London Plan (2021), and the National Planning Policy Framework (2021).

40. Drainage Maintenance Plan

Prior to first occupation of the residential element of the development details of sustainable urban drainage systems to be implemented on site including a maintenance plan for the drainage system (SUDS components) shall be submitted to and approved by the Local Planning Authority and the approved SUDS features shall be maintained and permanently retained thereafter.

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

41. Former Lifetime homes standards

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

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

42. Former Adaptable wheelchair housing

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

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

43. Tree Planting and Soil Rooting Volume

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 G4, G5 and G7 of the London Plan (2021), policy 5.10 of Ealing’s Development Management DPD and Ealing’s SPG 9 - Trees and Development Guidelines.

44. Tree Monitoring Plan

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

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

A tree monitoring program to include:

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

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

- Results of each site visit by the lead arboriculturist with photos attached.
- Assessment of the retained and planted trees including any necessary remedial action as a result of damage incurred during construction.

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

45. Green Roofs

Details of the construction, specifications and maintenance schedule for any green roofs within the development shall be submitted to and approved in writing by the local planning authority prior to the first occupation or use of the flats hereby approved. The development shall be implemented only in accordance with these approved details and retained thereafter.

Reason: To ensure that the development is landscaped in the interests of the visual character and appearance of the area and residential amenity of prospective occupiers, and in accordance with policies G5 and G6 of the London Plan (2021), policies 1.1 (h) (g), 1.2 (f), 2.1(b) and 2.10 of the Ealing Core Strategy (2012), policies ELV 7.4 and 7B of the Ealing Development Management Development Plan Document (2013) and the National Planning Policy Framework.

46. Electric Vehicle Charging

Prior to the first occupation of the development hereby approved, infrastructure for active provision for charging electric vehicles and passive provision for the remaining spaces shall be provided to accord with London Plan (2021) standards and this infrastructure together with the associated access and internal carriageway shall be kept continuously available.

Reason: To reduce emissions of greenhouse gases and to improve local air quality in the interests of health, in accordance with policies T6, SI1 and SI2 of the London Plan (2021), policies 1.1(e), 1.1(f), 1.1(j) and 1.2(k) of Ealing's adopted Development (or Core) Strategy 2012, and the National Planning Policy Framework.

47. Habitat Improvement

Prior to first occupation of the residential element of the development the recommendations in Section 6 of the Ecological Impact Assessment by David Archer Associates (February 2023) shall be fully implemented.

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

48. Car Parking Management Plan

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

Reason: To promote sustainable patterns of transport, in accordance with Section 9 of the National Planning Policy Framework (2021) and policies T4 and T6 of the London Plan (2021).

49. Refuse Management Plan

Details of a Refuse Management Plan shall be submitted to and approved in writing by the local planning authority prior to the first occupation or use of the flats hereby approved. This Plan shall include details of access and turning for refuse collection vehicles within the site. The development shall be implemented only in accordance with these approved details and retained permanently thereafter.

Reason: To ensure the provision of satisfactory facilities for the storage of refuse and recycling material, in accordance with policies 1.1 and 1.2 of the Adopted Development (Core) Strategy, policy 7B of the Adopted Ealing Management Development Plan Document (2013) and policy S7 of the London Plan (2021).

50. Archaeological Investigation

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- a. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- b. Where appropriate, details of a programme for delivering related positive public benefits
- c. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England’s Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Reason: To safeguard the archaeological interest of the site in accordance with London Plan Policy HC1 and paragraphs 190 and 197 of the National Planning Policy Framework (2021).

51. Design of Site Entrance Junction

Prior to commencement of the superstructure of the development, details of the design of the site entrance on Kensington Road in relation to the planned cycle route along Kensington Road shall be submitted to the Council for approval in writing. Details shall include appropriate visibility splays and in accordance with Department of Transport Note LTN 1/20: Cycle infrastructure design (July 2020).

Reason: To ensure adequate highway, cyclist and pedestrian safety in accordance with policies 1.1(e), 1.1(j) and 2.1(c) of the Ealing Core Strategy (2012), and to promote sustainable patterns of transport in accordance with policies T4 and T5 of the London Plan (2021).

52. Details of Cycle/Pedestrian Route through Site

Prior to commencement of the development, details of the proposed cycle/pedestrian routes through the site shall be submitted to the Council for approval in writing. The approved details shall be fully implemented in accordance as shown on the approved plans and made operational before the first occupation of the development, and permanently retained thereafter.

Reason: To ensure adequate cyclist and pedestrian safety, to promote sustainable patterns of transport and in the interests of the visual character and appearance of the area in accordance with policies T4, T5, G5 and G7 of the London Plan (2021), policies 1.1 (h) (g), 1.2 (f), 2.1(b) and 2.10 of the Ealing Core Strategy (2012), and policies 7.4 and 7B of the Ealing Development Management DPD (2013).

53. Disabled Parking for Commercial Uses

Prior to commencement of any works to the superstructure of the commercial element of the development hereby approved and following approval of a Parking Management Plan details of the provision of disabled parking spaces for the commercial unit shall be submitted to and approved in writing by the local planning authority. The commercial development shall be operated only in accordance with these approved details permanently thereafter.

Reason: To promote sustainable patterns of transport, in accordance with Section 9 of the National Planning Policy Framework (2021) and policies T4 and T6 of the London Plan (2021).

54. Construction Environment Management Plan

Prior to commencement of any demolition or construction works on site a Construction Environment Management Plan (CEMP) shall be submitted to the Council for approval in writing. The development shall be implemented in accordance with this approved Plan which shall set out how the risk of pollution related impacts on ecology at the construction stage will be avoided and mitigated.

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

55. Sound Insulation Measures

Prior to first occupation of the residential element of the development the recommendations for glazing specifications and limits on the openable area for bedroom windows set out in in the Noise Impact Assessment by KP Acoustics (February 2023) shall be fully implemented.

Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise and vibration, in accordance with with Interim Supplementary Planning Guidance 10, policy 1.1(j) of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management DPD (2013), policy D14 of the London Plan (2021), and the National Planning Policy Framework (2021).

56. Signage

Details of a signage to public routes through the development shall be submitted to and approved in writing by the local planning authority prior to the first occupation or use of the flats within the

development hereby approved. The development shall be implemented only in accordance with these approved details and retained thereafter.

Reason: To ensure that adequate signage is provided for the development and in the interests of the visual character and appearance of the area and residential amenity of prospective occupiers, and in accordance with policies D4 and D5 of the London Plan (2021), policies 1.1 (h), 1.1(g), 1.2 (f), 2.1(b) and 2.10 of the Ealing Core Strategy (2012), policies ELV 7.4 and 7B of the Ealing Development Management Development Plan Document (2013) and the National Planning Policy Framework.

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)

2. Achieving Sustainable Development
5. Delivering a sufficient supply of homes
6. Building a strong, competitive economy
9. Promoting sustainable transport
10. Meeting the challenge of climate change, flooding and coastal change
11. Making effective use of land
12. Achieving well-designed places
13. Protecting Green Belt land
14. Meeting the challenge of climate change, flooding and coastal change
15. Conserving and enhancing the natural environment
16. Conserving and enhancing the historic environment

The London Plan (2021)

- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D11 Safety, security and resilience to emergency
- D12 Fire safety
- D13 Agent of Change
- D14 Noise
- H1 Increasing housing supply
- H2 Small sites
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H10 Housing size mix
- HC1 Heritage conservation and growth
- G2 Green Belt
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands

SI 1 Improving air quality
SI 2 Minimising greenhouse gas emissions
SI 3 Energy infrastructure
SI 7 Reducing waste and supporting the circular economy
SI 12 Flood risk management
SI 13 Sustainable drainage
E1 Offices
E2 Providing suitable business space
E3 Affordable workspace
E4 Land for industry, logistics and services to support London's economic function
E7 Industrial intensification, co-location and substitution
T3 Transport capacity, connectivity and safeguarding
T4 Assessing and mitigating transport impacts
T5 Cycling
T6 Car parking
T6.1 Residential parking

Supplementary Planning Guidance /Documents

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

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

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

Ealing Development Management Development Plan Document (2013)

Ealing local variation to London Plan policy 3.4: Optimising housing potential
Ealing local variation to London Plan policy 3.5: Quality and design of housing development
Policy 3A: Affordable Housing

Policy 4A: Employment Uses

Ealing Local variation to London Plan policy 4.7: Retail and town centre development

Ealing local variation to London Plan policy 5.2: Minimising carbon dioxide emissions

5.2.3. Post-construction energy equipment monitoring.

Ealing local variation to London Plan policy 5.10: Urban greening

Ealing local variation to London Plan policy 5.11: Green roofs and development site environs

Ealing local variation to London Plan policy 5.12: Flood risk management

Ealing local variation to London Plan policy 5.21: Contaminated land

Ealing local variation to London Plan policy 6.13: Parking

Policy 7A : Operational amenity

Ealing local variation to London Plan policy 7.3 : Designing out crime

Ealing local variation to London Plan policy 7.4 Local character

Policy 7B : Design amenity

Policy 7C : Heritage

Policy 7D : Open space

Adopted Supplementary Planning Documents

Sustainable Transport for New Development

Interim Supplementary Planning Guidance/Documents

SPG 3 Air quality

SPG 4 Refuse and recycling facilities (draft)

SPG 10 Noise and vibration

Other Material Considerations

Site Layout Planning for Daylight and Sunlight: a guide to good practice' (BRE209 2022)

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 decision to grant permission, specific consideration was given to the impact of the proposed development on the Green Belt, on the amenities of neighbouring properties and the character of the area as a whole. Consideration was also given to highways, and the provision of adequate living conditions for occupiers. The proposal is considered acceptable on these grounds, and it is not considered that there are any other material considerations in this case that would warrant a refusal of the application.

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

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

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

- a) A precise sound insulation calculation under the method given at BS EN12354-3: 2000, for the various building envelopes, including the use of the worst case one hour data (octave band linear noise spectra from 63 Hz – 4k Hz) by night and day, to arrive at the minimum sound reductions necessary to meet the SPG10 internal data.
- b) Approved laboratory sound insulation test certificates for the chosen windows, including frames and seals and also for ventilators, in accordance with BS EN ISO 140-3: 1995 & BS EN ISO 10140-2:2010, to verify the minimum sound reductions calculated.
- c) The SPG10 internal and external criteria to be achieved.

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

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

5. Land contamination:

- a) Reference should be made at all stages to appropriate current guidance and codes of practice; this would include:
 - i. Model Procedures for the Management of Land Contamination, CLR 11, Environment Agency, 2004
 - ii. Updated technical background to the CLEA model, Science Report: SC050021/SR3, Environment Agency, 2009
 - iii. LQM/CIEH Generic Assessment criteria for Human Health Risk Assessment (2nd Edition), 2009
 - iv. BS10175:2011 Investigation of potentially contaminated sites – Code of Practice
 - v. Secondary Model Procedure for the Development of Appropriate Soil Sampling Strategies for Land Contamination; Environment Agency, 2001
 - vi. Verification of Remediation of Land Contamination’, Report: SC030114/R1, Environment Agency, 2010
 - vii. Planning Policy Statement 23: Planning and Pollution Control;
 - viii. PPS23 Annex 2: Development on Land Affected By Contamination;
 - ix. Guidance for the safe development of housing on land affected by contamination, NHBC &

Environment Agency, 2008

- Clear site maps should be included in the reports showing previous and future layouts of the site, potential sources of contamination, the locations of all sampling points, the pattern of contamination on site, and to illustrate the remediation strategy.
- All raw data should be provided in a form that can be easily audited and assessed by the Council (e.g. trial pit logs and complete laboratory analysis reports)
- on-site monitoring for ground gases with any relevant laboratory gas analysis;
- Details as to reasoning, how conclusions were arrived at and an explanation of the decisions made must be included. (e.g. the reasons for the choice of sampling locations and depths).

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

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

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

8. Surface Water Drainage - Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. 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://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Recent legal changes under The Water Industry (Scheme for the Adoption of Private Sewers) Regulations 2011 mean that the sections of pipes you share with your neighbours, or are situated outside of your property boundary which connect to a public sewer are likely to have transferred to Thames Water ownership. Should your proposed building work fall within 3 metres of these pipes we recommend you contact Thames Water to discuss their status in more detail and to determine if a building over/near to agreement is required. You can contact Thames Water on 0845 850 2777 or for more information please visit our website.

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

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

- No infiltration based sustainable drainage systems should be constructed on land affected by contamination as contaminants can remobilise and cause groundwater pollution.

- Piling or any other foundation designs using penetrative methods should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution.
- Decommission of investigative boreholes to ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 109 of the National Planning Policy Framework.

The applicant should refer to the following sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:

- From www.gov.uk:

Our Technical Guidance Pages, which includes links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC (Environment Agency's Guiding Principles for Land Contamination) in the 'overarching documents' section

Use MCERTS accredited methods for testing contaminated soils at the site

- From the National Planning Practice Guidance:

Land affected by contamination

- British Standards when investigating potentially contaminated sites and groundwater:

- BS5930:2015 Code of practice for site investigations;

- BS 10175:2011+A1:2013 Code of practice for investigation of potentially contaminated sites;

- BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points;

- BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns and groundwater quality.)

All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person. The competent person would normally be expected to be a chartered member of an appropriate body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.

11. At least 21 days prior to the commencement of any site works, all occupiers surrounding the site should be notified in writing of the nature and duration of works to be undertaken. The name and contact details of persons responsible for the site works should be signposted at the site and made available for enquiries and complaints for the entire duration of the works and updates of work should be provided regularly. Any complaints should be properly addressed as quickly as possible.

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

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

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

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

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

19 The applicant is advised to contact Thames Water Developer Services and read its guide 'working near our assets' to ensure workings will be in line with the necessary processes that need to be followed if considering working above or near Thames Water pipes or other structures:

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DBt.

20. The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

23. A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 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.

24. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk