

Ref : 232800FUL

Address: 1 Stirling Road/1-9 Colville Road And, 67-81 Stirling Road , Acton, W3 8DJ

Ward: South Acton

Proposal: Demolition of existing buildings and construction of a mixed use development comprising commercial floorspace (Use Class E(g)), 95 affordable residential units (Use Class C3) and 429 rooms of purpose built student housing (Sui Generis), within two buildings, comprising 20 and 11 storeys, with landscaping, and associated ancillary and enabling works

Drawing numbers: BOL-HBA-SW-RF-DR-A-010100 (Existing Site Location Plan); BOL-HBA-AB-RF-DR-A-010101 (Existing Block Plan 1-9 Colville Road); BOL-HBA-AB-RF-DR-A-010102 (Existing Roof Plan 1-9 Colville Road); BOL-HBA-JK-RF-DR-A-010103 (Existing Block Plan 67-91 Stirling Road); BOL-HBA-JK-RF-DR-A-010104 (Existing Roof Plan 67-91 Colville Road); BOL-HBA-AB-XX-DR-A-010200 (Existing Elevations 1-9 Colville Road); BOL-HBA-JK-XX-DR-A-010201 (Existing Elevations 67-91 Stirling Road); BOL-HBA-SW-XX-DR-A-010300 (Existing Site Section Bollo Lane Urban Block);

BOL-HBA-SW-RF-DR-A-080050 (Proposed Site Location Plan)

Block AB
 BOL-HBA-AB-XX-SH-A-080001 (Accommodation Schedule); BOL-HBA-AB-RF-DR-A-080051 (Proposed Block Plan); BOL-HBA-AB-B1-DR-A-080099 (Basement Level); BOL-HBA-AB-00-DR-A-080100 (Level 00); BOL-HBA-AB-01-DR-A-080101 (Level 01); BOL-HBA-AB-02-DR-A-080102 P02 (Level 02); BOL-HBA-AB-ZZ-DR-A-080103 (Levels 03-06); BOL-HBA-AB-ZZ-DR-A-080107 (Levels 07-09); BOL-HBA-AB-ZZ-DR-A-080110 (Levels 10-17); BOL-HBA-AB-ZZ-DR-A-080118 (Levels 18-19); BOL-HBA-AB-RF-DR-A-080120 (Roof Level); BOL-HBA-AB-XX-DR-A-080200 (North Elevation); BOL-HBA-AB-XX-DR-A-080201 (East Elevation); BOL-HBA-AB-XX-DR-A-080202 (South Elevation); BOL-HBA-AB-XX-DR-A-080203 (West Elevation); BOL-HBA-AB-XX-DR-A-080300 (Section AA); BOL-HBA-AB-XX-DR-A-080450 (Typical Bay Studies) (all plans Rev 01 unless otherwise specified);

Block JK
 BOL-HBA-JK-XX-SH-A-080001 (Block JK GIA Areas)

and Apartment Schedules); BOL-HBA-JK-RF-DR-A-080052 (Proposed Block Plan); BOL-HBA-JK-00-DR-A-080100 rev P02 (Proposed Ground Floor Plan); BOL-HBA-JK-01-DR-A-080101 (Proposed Level 01 Floor Plan); BOL-HBA-JK-02-DR-A-080102 (Proposed Level 02 Floor Plan); BOL-HBA-JK-ZZ-DR-A-080103 (Level 03 – 05 Floor Plan); BOL-HBA-JK-06-DR-A-080106 (Level 06 Floor Plan); BOL-HBA-JK-07-DR-A-080107 (Level 07 Floor Plan); BOL-HBA-JK-ZZ-DR-A-080108 (Level 08-10 Floor Plan); BOL-HBA-JK-RF-DR-A-080111 (Proposed Roof Plan); BOL-HBA-JK-XX-DR-A-080200 (Proposed South West Elevation); BOL-HBA-JK-XX-DR-A-080201 (Proposed North East Elevation); BOL-HBA-JK-XX-DR-A-080202 (Proposed South East Elevation); BOL-HBA-JK-XX-DR-A-080203 (Proposed North West Courtyard Elevation); BOL-HBA-JK-XX-DR-A-080301 (Proposed Section AA); BOL-HBA-JK-XX-DR-A-080450 (Bay Study A); BOL-HBA-JK-XX-DR-A-080451 (Bay Study B) (all plans Rev 01 unless otherwise specified)

Supporting Documents:

Acton PBSA Needs Assessment (Savills, 19 June 2023); Agent of Change Assessment (IDOM, June 2023); Air Quality Assessment (IDOM, June 2023); Operational Energy Assessment (Greengage, June 2023); Biodiversity Impact Assessment (Greengage, June 2023); Circular Economy Statement (Scotch Partners, 30 June 2023); Commercial Strategy Report (AND, June 2023); Daylight and Sunlight Report (EB7, 29 June 2023); Outline Delivery Servicing Plan (RPS, 3 July 2023); Design and Access Statement (Hawkins/Brown, 29 June 2023); Energy and Sustainability Assessment (AE Applied Energy, 3 July 2023); Fire Strategy, Orion Fire, 4 July 2023); Drainage Strategy (IDOM, 28 June 2023); Gateway One Fire Statement (Orion Fire, 4 July 2023); Healthy Streets Transport Assessment (3 July 2023); Noise Assessment (Dice Environmental, 16 June 2023); Outline Construction Logistics Plan (RPS, 3 July 2023); Archaeological Desk Based Assessment (Oxford Archaeology, 14 June 2023); Phase II Geo-Environmental Assessment (IDOM, December 2022); Planning Statement (DP9, July 2023); Preliminary Ecological Assessment (Greengage, 20 June 2023); Statement of Community Involvement (London Communications Agency, June 2023); Purpose Built Student Accommodation Management Plan (Homes for Students, June 2023); Framework Travel Plan (RPS, 3 July 2023); Whole Life Carbon Assessment (Greengage, June 2023); Wind Microclimate Assessment Report (GIA Chartered Surveyors, 22 June 2023); Heritage, Townscape and Visual Impact Assessment (July 2023);

Type of Application: Major Application

Application Received: 6 July 2023

Report by: Joel Holland Turner

Recommendation: Grant Permission, subject to conditions and Legal Agreement

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Executive Summary:

This application constitutes a revised scheme to a previously consented scheme (214611FUL), which was approved for two buildings up to 19 storeys in height, to accommodate a total of 237 residential units. This scheme, along with other consents in this urban block was approved based on the principles of a Masterplan that was produced to support the emerging development within this area by Hawkins/Brown.

The proposed development involves the demolition of existing buildings and the construction of two new buildings. In the context of the Hawkins/Brown Masterplan, shown in *Figure 06*, part of the site is referred to as Block AB and the proposed development here would involve the construction of a 20-storey mixed-use building comprising industrial uses at ground and first floor and Purpose-Built Student Accommodation (PBSA) (*sui generis*) on floors above. The first floor and second floor of the building would accommodate internal amenity areas and the rooftop would provide communal outdoor space for residents.

Block JK, as per the Hawkins/Brown Masterplan, would also comprise a mixed-use building up to 11 storeys, with industrial space provided at ground and first floor levels and 95 homes above. The homes provided include a good mix of housing and would provide good quality living conditions that are compliant with the residential standards of the London Plan.

The proposal also involves the full re-provision of existing industrial floorspace within the scheme, in line with the requirements of Policy E7 of the London Plan. The proposal also involves improvements in comparison to the approved scheme, with a better layout of industrial space within Block AB that has improved direct access to the proposed loading bay on Stirling Road.

Affordable Housing would be provided on a collective basis, with the Class C3 residential dwellings to be all affordable housing, with the student accommodation provided in Block AB to all be managed private rental. On this collective basis, and calculated by Habitable Room, the scheme would deliver 38% Affordable Housing, with a tenure split of 55/45 in favour of London Affordable Rent. This is considered to be a good offer that goes over and above the existing consented scheme on the site, with an uplift in total homes from 87 to 95.

Consideration has been duly given to the suitability of the site to accommodate student accommodation. A PBSA needs assessment was carried out, which reviewed the existing PBSA developments within the Borough as well as those emerging. The GLA is strategically supportive of the principle of PBSA in this location and the Needs Assessment carried out has demonstrated the significant increase in the number of full-time students living in the Borough and the relative lack of existing PBSA stock within Ealing to meet the current and future growth rates. Given the site's proximity to existing public transport nodes and the ability of the site to be optimised to deliver a substantial increase, it is considered that the proposal for student accommodation in this location can, in principle, be supported.

The design of the proposed development is considered to be high quality in its architectural expression, that significantly enhances the character and appearance of the local area, which currently presents as hostile and unwelcoming for the local community. Each building has its own individual character that produces a high-quality external appearance that will have a positive impact on the overall appearance of the area. Whilst it is noted that the existing consent establishes the principle of the site to accommodate a tall building, a full assessment of its suitability has been carried out within this report. This assessment reviews a number of vantage points and demonstrates that a tall building remains an acceptable outcome for this site. A full assessment of several heritage assets has also been carried out, which has concluded that the proposal would result in less than substantial harm, with the public benefits of the proposed development significantly outweighing any harm caused.

Transport and Highways considerations have been assessed in full, and the proposed development would provide adequate servicing arrangements for both the residential and industrial elements of the proposed development. Compliant levels of cycle parking are provided, and public realm improvements are proposed within the scheme, including new street trees, expanded footpath and new crossing across Colville Road.

Council's Energy Consultant has also reviewed the scheme in line with the sustainability hierarchy of the London Plan and is generally supportive of the Energy Strategy. The scheme would deliver significant carbon reductions, which will be monitored to ensure compliance.

Overall, the proposed development is a well-considered scheme, with an excellent design that will deliver new homes and industrial space. It is consistent with the priorities, vision and strategy of the Council as outlined within the Council Plan, by delivering more industrial capacity in a more modern and flexible arrangement that would suit a variety of existing and emerging industries within West London. This would have a net benefit on employment opportunities for existing residents and attract new businesses. It would also deliver 95 new affordable homes into a highly accessible and desirable location and the student accommodation proposed would ease some pressure on existing housing stock across the Borough. In addition, the proposal would deliver significant improvements to the

overall character of the area, and along with other schemes within the area, would improve the safety and security of a currently hostile and unwelcoming environment.

It is accordingly recommended that the application be approved, subject to conditions, s106 legal agreement and Stage II referral to the GLA.

Recommendation:

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

Heads of Terms

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

Financial Contribution Heading	Proposed Contributions
Education Infrastructure	£300,000
Healthcare provision	£400,000
Transport and Public Realm	£300,000
Bus Service Improvements (TfL)	£234,000
Public Open Space	£63,333
Children’s Play Space	£15,900
Allotment Garden Improvements	£10,828
Active Ealing (Sports Infrastructure)	£150,000
Employment and Skills Monitoring and Programs	£200,000
Air Quality	£93,340
Subtotal	£1,767,401
Carbon Dioxide Offsetting	£174,635
Post Construction Energy Monitoring	£9,000
Total Contributions	£1,951,036

- Affordable housing provision of 38% (scheme-wide basis), with a tenure split of 55/45 (Habitable Room) in favour of LAR over Shared Ownership
- Nomination agreement with one or more higher education providers to cover 50% of PBSA rooms within the proposed development in perpetuity, at the point of occupation.
- 15 full apprenticeships, 25% Local Labour, 20 weeks of work experienced to be completed. A £49,395 penalty for each obligation that is not met.
- An Employment, skills, and training delivery strategy shall be submitted to the Employment and skills S106 team. The developer will engage directly with the partnerships and procurement manager and will be required to submit quarterly monitoring no later than one week after quarter end.
- An early-stage Affordable Housing Viability Review mechanism to be triggered if an agreed level of progress on implementation has not been made within two years of any planning permission.
- A s278 agreement to provide the disabled parking bays on the street as shown on the approved plans. All disabled parking bays shall be equipped with electric vehicle charging infrastructure.

The s278 agreement shall also include the widening of the footpath on Colville Road and works to implement a crossing in consultation with Council’s Highways Team. S278 agreements will also be required to create a dropped kerb to the loading bays to meet Council’s Waste Collection guidelines. Details of the planting of street trees will also be required.

- Restriction of parking permits to all residents within the Controlled Parking Zone
- Implementation for a travel plan
- All contributions to be index linked
- Payment of the council’s reasonable legal and professional costs in preparing the s106 agreement

AND

That the grant of planning permission be subject to the following conditions:

Conditions/Reasons and Informatives: refer to Annexe 1

Site Description:

The site is formed by two separate, unattached plots that are within an industrial block, that is bounded by Bollo Lane, Roslin Road, Stirling Road and Colville Road. The first site is a corner plot which has frontages to Bollo Lane, Colville Road and Stirling Road and is described as 1-9 Colville Road and 1 Stirling Road. It has an area of approximately 1,180sqm and a collective street frontage of 97 metres.

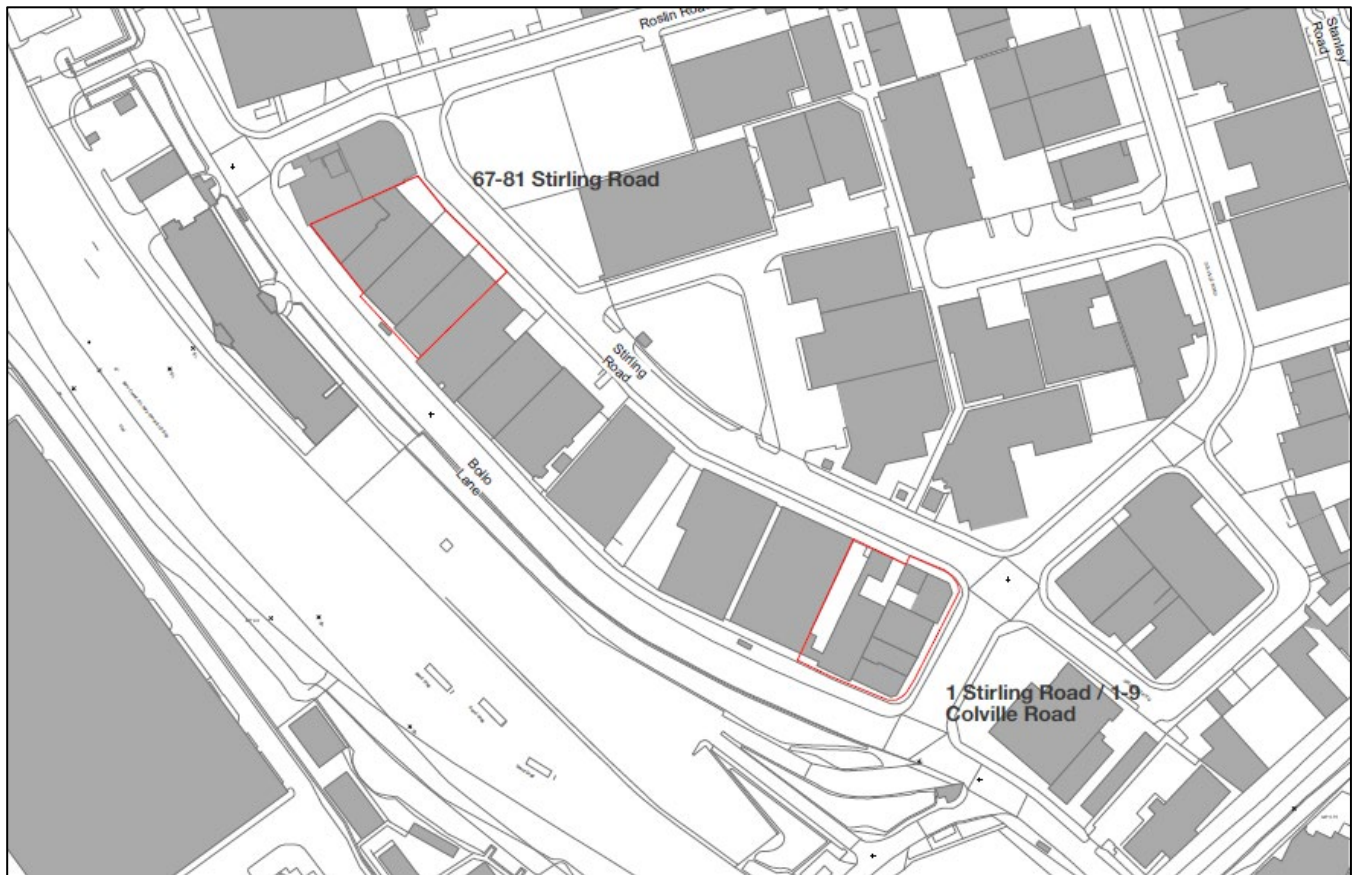


Figure 01: Site Location Plan

The site is located within the South Acton Industrial Estate and is designated as a Locally Significant Industrial Site (LSIS). The site is also within an area of Local and District Park Deficiency. The site also has an archaeological interest area designation and is not located within any designated Opportunity Areas or Development Sites.



Figure 02: Existing Site Conditions for 1-9 Colville Road (Block AB)

The second site has frontages to both Stirling Road and Bollo Lane and is described as 67-81 Stirling Road. This site is also within the same established industrial area and is designated as a Locally Significant Industrial Site (LSIS) and also has an Archaeological Interest Area designation and is also located within an area of Local Park Deficiency. This site has an area of approximately 1,340sqm, with a frontage to Stirling Road of 29 metres and a frontage to Bollo Lane of approximately 40 metres.



Figure 03: Existing Site Conditions for 67-81 Stirling Road (from Bollo Lane) (Block JK)

The surrounding area is predominantly consisting of industrial uses, owing to the designation of the South Acton Industrial Estate as a Locally Significant Industrial Site. However, it should be noted that there is an emerging mixed-use character within the area, with a number of proposals recently granted permission by Council, which will result in taller buildings and co-located uses.

At the January 2021 Planning Committee, Council granted approval for a mixed-use hybrid scheme (planning permission and outline planning permission) on the stretch of land between the railway corridor and Bollo Lane. This is a phased development with Phases 1 & 2 granted planning permission, which was for 550sqm of B1(a)(b)(c) uses, 125sqm of flexible Class A uses and 200 affordable and market dwellings in a block up to 25 storeys. Phases 3 & 4 was granted outline planning permission for 1800sqm of B1(a)(b)(c) uses, 175sqm of flexible Class A uses and 700 affordable and market residential units in 8 blocks, between 8-storeys and 18-storeys in height.

Planning permission was granted for a mixed-use scheme at 2-10 Roslin Road & 29-39 Stirling Road (204553FUL) for collectively 149 residential units and 2,421sqm of flexible employment space (Class E(g)) which is currently under construction. The building at Roslin Road was approved to be 15-storeys in height and the building at Stirling Road being part 2-, part 8- and part 11-storey. A scheme has also been approved at 3-15 Stirling Road (214991FUL) for a development up to 14-storeys in height, delivering circa 2,000sqm of industrial space and 88 homes.

The Proposal

The proposal involves the demolition of the existing buildings at 1 Stirling Road/1-9 Colville Road (Block AB) and 67-81 Stirling Road (Block JK).

Block AB

The proposal involves the construction of a 20-storey building to accommodate Purpose Built Student Accommodation (PBSA) within the sui generis use class. At ground and first floor levels, the proposal would accommodate predominantly industrial type uses as a reversion of the floorspace of the existing buildings within the LSIS. The ground floor would also accommodate an entrance to the student accommodation building, including reception area, post room and additional amenity areas for sitting. At first floor level, the proposal would also include a large amenity area, including a games room, shared kitchen and lounge area, study space, meeting rooms and gymnasium, that would be accessible to all student residents.



Figure 04: First Floor Plan showing industrial space and student internal amenity area

At second floor and above, the development would accommodate PBSA rooms for students in a variety of different configurations. These include studio rooms, which contain self-contained accommodation in

a compact format, as well as cluster rooms in different groupings, of which each have access to a shared kitchen and lounge area. The table below illustrates the mix of student accommodation proposed.

Accommodation Type	Total No.
Studio	200
4-bedroom cluster	8
5-bedroom cluster	11
6-bedroom cluster	21
8-bedroom cluster	2

The roof of the development would provide outdoor amenity space for residents of the student accommodation.

Block JK

Similar to the proposal for Block AB, the proposed development would provide for industrial space at ground and first floor levels, that collectively with Block AB would constitute a re-provision of the space that is to be demolished within the LSIS.

The residential accommodation proposed for this block would be conventional Class C3 residential dwellings accommodating a mix of different unit sizes. A summary of the number of homes and their respective configurations is provided within the table below:

Unit Type	Unit Type
1-bedroom	27
2-bedroom	60
3-bedroom	8
TOTAL	95

Block JK would deliver 95 homes within Class C3. All these homes would be affordable housing within both London Affordable Rent and Intermediate tenure. Whilst the building itself would accommodate 100% affordable housing, when combined with the number of habitable rooms proposed within the PBSA in Block AB, the scheme would deliver 38% when calculated by habitable room, with a tenure split of 55/45 in favour of London Affordable Rent.

Generous amenity provisions would be provided within the scheme, which includes a ground floor courtyard, that would be accessible to residents, workers, and the general public. Small areas of amenity would also be provided to workers on an external bridge proposed that would link the first floors of the industrial space. Residential outdoor amenity space would be provided at both second-floor level and roof level.



Figure 05: Detailed Design for Blocks AB (Student Accommodation) and JK (C3 Dwelling Units)

Consultation:

Preapplication

Ordinarily, a scheme of this size would be reviewed by Council’s Design Review Panel and Community Review Panel. During pre-application meetings with the GLA, the requirement to be re-reviewed by both the DRP and CRP was discussed. It was the view of both the GLA and Council Officers that this would not be necessary in this instance, particularly as the consented scheme (214611FUL) was reviewed by the DRP (5 March 2021). The previous application pre-dates the creation of Ealing’s Community Review Panel. The advice was a material consideration in the assessment of the previous application, which was reported to the Planning Committee in November 2021, where a resolution to grant permission was agreed.

Public consultation was also carried out by the applicant prior to the submission of this application which is outlined within the submitted Design and Access Statement and Statement of Community Involvement. Initial stakeholder engagement occurred in April 2023, which included with Councillors, Cabinet Members, local community, and business groups. Formal consultation commenced in May 2023, which consisted of in-person events and webinar. The applicant advises that the webinar was cancelled due to lack of interest. The local community was informed about this event through a newsletter mailout to 3,311 local addresses.

Newsletter	A newsletter was sent to a significant amount of local addresses. A copy of this newsletter has been provided to the Council
In-person event	Took place on 4 May 2023 5 attendees No comments were returned from those in attendance
Webinar	Was scheduled but cancelled due to lack of interest 1 party had registered for the event (Ealing Civic Society)

	The Ealing Civic Society provided an email with their questions which was responded to by the applicant team
Email and Phone	An email and phone line were set up – 3 emails were received and responded to

Whilst the response rate, as advised by the applicant, was relatively low, the applicant has provided a summary of the types of comments that were received. These were typically related to question about why the changes to the scheme were being made, impact of student accommodation on the surrounding area and the demand for this type of use. This is laid out in greater detail within the Statement of Community Involvement that has been submitted with this application.

PUBLIC CONSULTATION

Neighbour Notification

In accordance with the requirements of Ealing Council's Statement of Community Involvement (2015) and The Town and Country Planning (Development Management Procedure) Order 2015, the application was advertised by way of a site notice. Consultation commenced on 02/08/2023 and concluded on 23/08/2023.

Ninety-one (91) representations to the proposed scheme were received during the statutory consultation period. Of these representations, 88 were marked as objections, 1 as supporting and 2 as neutral. A summary of the points raised is provided below:

- Development is tall and too high and would overshadow nearby buildings.
- Proposal would overwhelm transport and services within the community.
- No provision for enhanced infrastructure (GPs, schools, bus routes).
- Overdevelopment.
- Lack of greenspace.
- Development goes against the grain of the Acton Gardens development.
- Parking provision is inadequate.
- Industrial area should be maintained and is being eroded.
- Increased noise and pollution.
- Insufficient Affordable Housing.
- No clear integration with other developments within the area.
- Is student accommodation really needed here.
- Loss of view.
- Proposal would shade allotments during growing season.
- Development is 23-storeys high, not 20.
- Developers should consider retrofitting as demolition and reconstruction would result in significant carbon increases.

An objection to the scheme from Cllr Gary Malcolm was also received, with the following points raised.

- The proposal is out of keeping with the area to the south (Southfield) and also taller than most of the buildings in the South Acton area. The Council policies on tall building would mean that

this proposal should not be allowed as it is too tall within those guidelines.

- The density of housing is increased a lot with the development and the open spaces and infrastructure given the number of people in the area will be limited.
- This proposal will take us away from being carbon neutral so environmentally this is not a sensible proposal.

Officer Response: The overwhelming comments related to the concern with respect to the height of the proposed development and the need for student accommodation within the area. Whilst the concern with respect to height is noted, it is a material consideration that there is already a consented scheme on the application site and the proposed development falls within the parameters set by this consented scheme. Nevertheless, a full assessment of the suitability of the site for a tall building is provided within this report. In addition, the report also addresses the needs and benefits of student accommodation on this site.

Some representations were made saying that the development is 23 storeys in height. This is incorrect. Whilst it is noted that commercial space proposed within the development does include increased floor-to-ceiling heights, this does not change the number of storeys within the development.

A number of representations were also made saying that the development is not in accordance with the Acton Gardens Masterplan. However, the development does not fall within the boundaries of the Acton Gardens Masterplan and accordingly, this application is assessed on its own merits.

Whilst Council does hold a position that retrofitting should be first considered, in this instance, the reuse of the existing building would not fully optimise the potential of this site. It must be noted that the Whole Life Carbon Assessment has been assessed, which shows a commitment for the re-use of existing building materials and the resultant diversion of existing building materials from landfill.

Parking provision is irrelevant to the assessment of this application, as London Plan policy requires a starting position of “car free development”. Existing CPZs in the surrounding area would prevent future residents from obtaining parking permits.

The proposed development delivers significant affordable housing provision that qualifies for the fast-track route, as defined by London Plan policy.

In consideration to local infrastructure, Council is undertaking a master planning exercise to determine local infrastructure needs and how they can be delivered. Nevertheless, Council has secured significant financial contributions within this scheme that will provide additional financial resources to deliver new infrastructure for the local community.

<u>EXTERNAL CONSULTATION</u>	
Health and Safety Executive	Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations.
Thames Water	<p>Requested Piling Method Statement condition as the site is within 15 metres of a strategic sewer.</p> <p>Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application.</p>
Active Travel England	In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time.
London Borough of Hounslow	No objection
Greater London Authority (GLA)	<p><u>Land Use Principles:</u> The co-location of industrial and residential uses is established and remains supported in line with earlier planning permission ref: 214611FUL. The provision of student accommodation, in place of the consented Class C3 residential development, is strategically supported subject to fully addressing the requirements of Policy H15.</p> <p><u>Affordable Housing:</u> The provision of 38% Affordable Housing by HR, with an appropriate tenure split, is supported and eligible for the Fast Track Route.</p> <p><u>Urban Design:</u> The buildings are arranged in a similar manner to the consented scheme and this remains acceptable. The proposal is not located within an area that is identified as suitable for tall buildings. Nevertheless, the height of the built form is lower than that previously consented and does not raise any strategic concerns.</p> <p><u>Transport:</u> A contribution to deliver bus service improvements to mitigate future residents of the site should be secured. A revised ATZ assessment should be provided which supports the 10 Healthy Streets indicators and assesses routes during the hours of darkness. Further details are also requested on the delivery and servicing strategy.</p> <p>Other issues relating to <u>sustainable development</u> and <u>environment</u> also require resolution prior to the Mayor’s decision making stage.</p>

Transport for London (TfL)	Comments included in Stage I response from GLA
Healthcare (NHS Property)	Financial contribution towards local healthcare provision has been requested.
National Highways	Following a review of documents accompanying the full planning application submission, we are able to confirm that the submitted proposals would not affect the safety, reliability and/or operation of the SRN. No objection.
Metropolitan Police Designing Out Crime Unit	The development must achieve Secured by Design accreditation prior to occupation
Historic England	Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.
NATS Safeguarding	No comment
Crossrail Safeguarding	The application relates to land outside the limits of land subject to consultation by the Cross-rail Safeguarding Direction. No comment.
London Underground Safeguarding	No objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to railway infrastructure. Condition has been recommended for a Detailed Design and Method Statement.
Heathrow Airport	Although it is not anticipated that the use of a crane at this site will impact Heathrow's Obstacle Limitation Surfaces, Instrument Flight Procedures or radar. We would like to advise the developer that if a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane, as per the requirements set out by CAP1096. https://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=5705
<u>INTERNAL CONSULTATION</u>	
Pollution-Technical (Noise)	A number of conditions have been recommended with relation to noise and vibration. These conditions will assess the sound insulation proposed to determine if these would effectively mitigate adverse noise impacts generated by surrounding industrial activities.
Pollution-Technical (Air Quality)	Please note that as this a major development and in a very close proximity to other construction sites, they will be required to install AQ monitors for the duration of demolition and construction phase.

	<p>They have proposed that they will be installing an emergency generator, however the air quality assessment doesn't consider impacts on nearby receptors or future receptors.</p> <p>I should note as with the previous scheme (214611FUL), they have not modelled pollutant concentrations and their explanation is because that the proposed location is below the relevant air quality objectives. However, this doesn't take into account the effects of street canyons as a result of the many developments in the area. As stated previously, the development will need to mitigate poor air quality for future residents.</p>
<p>Pollution-Technical (Contaminated Land)</p>	<p>Preliminary risk assessment and site investigation report submitted with the application (Ref. IDOM GEA-21849h - 22-457) has been reviewed.</p> <p>The sites have not been cleared and it is considered that the investigation lacks coverage of the whole site, particularly the Bollo Yard site. At this site only 4 investigation points were used and three of these were in the northwest boundary and of these 3, 2 of the points hit concrete at 0.25m. It is understood from the plans that this site will have a courtyard with soft landscape in the southern part, but there is no information on this part of the site.</p> <p>The Colville Road site is to have a basement so further coverage of the proposed void could be useful.</p>
<p>Cycling Officer</p>	<p>Bike store sizes need to be checked to ensure there is space for the required number of bikes at adequate spacing. Bike stores should be directly accessible from outside, as well as from inside the building. Route shown to left-hand bike store contains too many bends and corners. Space is needed for non-standard (larger) bikes.</p> <p>Officer Comment: Revised cycle parking plans have been received in response to these and TfL's comments.</p>
<p>Transport Services</p>	<p>Similar scheme proposed in terms of highways works to existing consent.</p> <p>S278 agreement will be required for works to the highway.</p> <p>Financial contributions requested to Transport and Public Realm improvements.</p>
<p>Waste and Street services</p>	<p>Loading bays to be used for collections shall provide for a dropped kerb.</p>
<p>Employment and Skills</p>	<p>The developer needs to secure an employment, skills, and training delivery strategy, which needs to be signed off by the Employment and skills S106 team. The developer will engage directly with the partnerships and procurement manager and will be required to submit quarterly monitoring no later than one week after quarter end. (S106ELS@ealing.gov.uk).</p>

	<p>The developer must deliver 15 full apprenticeships, and there will be a charge of £49,395 per apprenticeship obligation that is not met. 25% local labour must be employed, as a minimum. 20 weeks of Work Experience must be completed throughout the length of the project. Contribution is sought towards monitoring costs and local employment/apprenticeship projects.</p> <p>Penalties for not meeting quarterly monitoring deadlines can be implemented if the data is not returned to the partnerships and procurement manager in a timely manner, within a week of quarter end.</p> <p>All site apprenticeships and jobs are to be advertised via Ealing brokerage service and all vacancies have to be advertised to local people only for the first 72hrs. Entry-level jobs should be offered to prior apprentices first.</p> <p>The employment, skills and training programme should include as many community engagement events as possible. Please see below for some examples:</p> <ul style="list-style-type: none"> • Developers to visit local schools, youth groups, and colleges to speak about their job and sector helping to demystify and encourage interest in construction professions. • Developers to offer mentoring to local people interested in construction. • Site Open Days for local people. • Attending Job fairs run by Ealing Council/ local schools.
<p>Education Services</p>	<p>The projected child yield is 14.9 primary and 10.64 secondary. A financial contribution based on this has accordingly been recommended.</p> <p>Student accommodation does not necessitate the need for contributions towards primary and secondary education to be provided.</p>
<p>Energy Consultant</p>	<p>At the current design stage the overall site-wide CO₂ emissions will be cut by approximately 55.71%, with 52.86% carbon reduction through “Lean” efficiency measures (including the ASHPs), and 2.86% through “Green” PV panels. To note; the ASHPs should have been included in the “Green” figure, but this does not affect the evaluation of the energy strategy. A GLA Carbon Reporting spreadsheet has yet to be submitted.</p> <p>There is a shortfall of 1,838.4 tonnes CO₂ (over 30 years) in the zero-carbon that will be mitigated through an “offset” S106 payment at £95 per tonne to the Council of £174,635. If any later stage energy strategy hierarchy figures change then the Carbon Offset will need be amended prior to completion of the Legal Agreement.</p>
<p>Landscape Architect (Leisure and Parks)</p>	<p>Requested conditions requiring details of landscaping and children’s play space.</p>
<p>Active Ealing</p>	<p>A financial contribution towards indoor and outdoor sports facilities is sought based on a projected increase in population of 657 people.</p>

Relevant Planning Policies:

The policies relevant to this application are listed in the informative section of the recommendation toward the end of this report.

Reasoned Justification:

Main Issues

The main issues in assessing this proposal are as follows:

- The principle of the development, including the co-location of industrial uses on an LSIS site with residential uses.
- The suitability of the locality for student accommodation.
- Type of housing proposed, including housing mix.
- Affordable Housing provision.
- The quality of accommodation proposed.
- Design of the proposed development and the impact on local character.
- Suitability of the site for a tall building.
- Impact on Heritage.
- The impact of the development on neighbouring properties.
- The quality of the communal amenity space, landscaping, and children's play space.
- Transport and Highways considerations.
- Noise, Air Quality and Contaminated Land considerations, including Agent of Change.
- Energy and Sustainability matters.
- Crime Prevention.
- Refuse and Recycling Storage and Waste Management.

Background

Council has previously approved a previous scheme on the site under planning application ref: 214611FUL, dated 21/04/2022. Similar to this proposed scheme, the site proposed two separate buildings on two unconnected sites, with the approved scheme ranging in height from 11 to 19 storeys. The approved scheme consisted of commercial space at lower floor levels and collectively 237 units across the two buildings. The approved scheme adhered generally to the visions of the Hawkins Brown Masterplan, which was a framework developed as part of a previous scheme as to how this urban block within the LSIS could be delivered. This masterplan is shown in the image below.



Figure 06: Hawkins/Brown Framework Masterplan

A number of approved schemes within this area have utilised the principles established by this framework of their overall designs, including 204553FUL (29-39 Stirling Road and 2-10 Roslin Road), 214991FUL (3-15 Stirling Road) and 214611FUL, as mentioned above. In the context of the above masterplan, the application site refers to Block AB and JK and this report will commonly refer to the different parts of the development as such.

Key headline figures of the approved consent (214611FUL) are as follows:

- 237 new homes
- 38% Affordable Housing
- 4,094sqm of commercial space

Following grant of this consent, the applicant commenced pre-application discussions on an alternative proposal for the application site. The applicant has cited issues with the scheme as approved, including inflation in construction costs, interest rates and changes to building and fire regulations, including the need for a second staircase, which have proved as insurmountable to delivery of the scheme. Through a study commissioned by the developer to seek alternative land uses for the site, the discovery of an unmet demand for student accommodation within the local area has been the impetus for the submission of this revised proposal for the application site. The suitability of the site for this type of residential product will be discussed within a subsequent section of this report.

Whilst the approved development approved private market housing (Class C3) within Blocks AB and affordable housing (also Class C3) within Blocks JK, this revised scheme would propose PBSA (Purpose Built Student Accommodation) within Blocks AB and affordable housing, including an uplift in the number of units, within Blocks JK.

Principle of Development

The application site forms part of the South Acton Industrial Estate, which is also designated as a Locally Significant Industrial Site (LSIS). Policy E6 of the London Plan requires Boroughs to detail boundaries and policies for LSIS and make clear that the range of uses suitable in such locations fall within Classes B1c (Now E(g)(iii)), B2 and B8 uses. The Ealing Draft Local Plan Policy E6 also states that “industrial needs remain the primary consideration on designated LSIS” due to the conforming uses within this designation delivering high levels of employment and economic value.

Policy E7 of the London Plan encourages local authorities to be proactive in the development of industrial locations and consider whether there is scope for intensification of these areas. This includes that “intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential or other uses”. As per Policy H5 of the London Plan, where a scheme would result in no net-loss of industrial capacity, the proposal may follow the fast-track route for Affordable Housing (minimum 35% by HR).

The Draft Local Plan Policy E6 states that “mixed intensification” or “co-location of uses” offers the opportunity for significant industrial and housing uplift, as well as improvements to quality of place, and economic and employment benefits for Ealing. However, like Policy E7 of the London Plan, the Draft Local Plan emphasises that such proposals for co-location should be brought forward as part of a “plan-led” or master planning process.

Like the previous consent on the application site (214611FUL), the proposed development generally follows the parameters that were identified within the Hawkins/Brown Masterplan shown in Figure 6 above. The principle of co-location of uses on these sites has previously been accepted by Council through the granting of this previous consent and remains to be a valid consideration through the assessment of this proposal.

It is also worthy of note that Council is currently undertaking a Masterplan exercise for the entire South Acton Industrial Estate that goes beyond the boundaries set by the Hawkins/Brown Masterplan. This Masterplan, undertaken in conjunction with Council Officers and local landowners, is seeking to outline development principles for the local area, including outlining areas of the LSIS that may be suitable for co-location. This Masterplan will set out preferred height limits for the area and infrastructure needs for the emerging community.

In terms of the overall principles of co-location of uses within the LSIS, the proposal would result in the full re-provision of industrial space within the development. There will therefore be no net loss of industrial capacity in terms of floorspace between the existing buildings and the proposed development. This was the same for the consented scheme over the site. The scheme would deliver the same 4,094sqm of industrial space across the two buildings, in comparison to the existing buildings to be demolished, which comprise 4,064sqm of industrial space. This accordingly results in a small uplift of 30sqm.

Similar to the existing consent, the applicant has submitted a Commercial Strategy Report, outlining evidence and data on the demands and requirement of local businesses seeking commercial space within Acton. The existing buildings, whilst some being vacant, comprise an eclectic mix of uses, including the Chiswick Auto Centre, Chiswick Auction House and office space. Much of the existing built form is generally low quality in architectural merit and fails to adequately address the street, particularly on Bollo Lane. The proposal therefore provides the opportunity to provide more modern industrial space that is truly flexible in nature that would provide for better quality and more sustainable workplaces.

As with the consented scheme, the Commercial Strategy outlines that the greatest demand for space include artist studios, design and maker spaces, craft food and drink production, TV and music production, co-working spaces, Start-up and SME Businesses and Hybrid office/maker/gallery spaces. Accordingly, the industrial floor plates have been designed with flexibility in mind, with large open spaces to facilitate potential subdivision and larger floor-to-ceiling heights. The large open spaces have been designed to accommodate large end-users, but also allow the flexibility for the space to be divided into smaller spaces to accommodate a number of different end-users.

A significant improvement between the consented and proposed schemes is the revised proposal for industrial space within Blocks AB. The consented scheme involved the industrial space being broken up by many of the facilities associated with the co-located residential use, including cycle parking, substation bin storage and entrance lobby, which resulted in a slight fragmentation from commercial spaces on Bollo Lane and the loading area proposed for Stirling Road. As the proposal now includes a basement to accommodate many of these facilities, this results in significantly more productive industrial spaces, particularly at ground floor level. The majority of the commercial space now has direct access to loading facilities on Stirling Road.

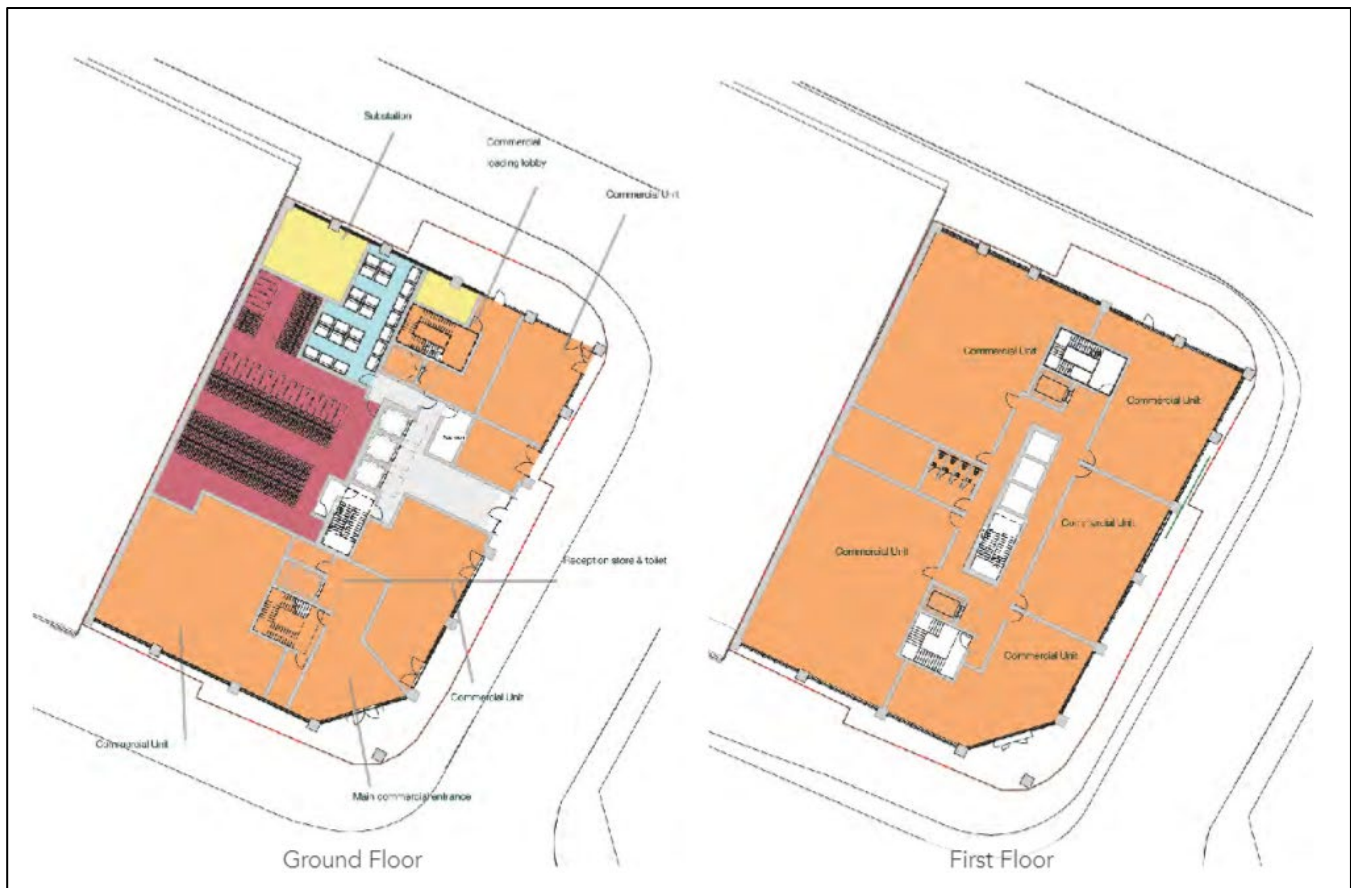


Figure 07: Consented Industrial Space for Blocks AB



Figure 08: Proposed Industrial Space for Blocks AB

The commercial space for Blocks JK remains largely unchanged, with only minor variations between the consented and proposed schemes.

It is worthy to note that the GLA is supportive of the overall principle of development and the commercial strategy presented, stating that “the co-location of industrial and residential uses is established and remains supported in line with earlier planning permission Ref: 214611FUL.”

Student Accommodation

As advised above, Blocks AB were approved as Class C3 residential dwellings under planning application ref: 214611FUL, and the proposed scheme would deliver in its place 429 rooms of purpose-built student accommodation (PBSA). The consented scheme would have contained 150 homes within Block AB. Policy H15 of the London Plan outlines the strategic importance of student accommodation within London, stating that “London’s higher education providers make a significant contribution to its economy and labour market. It is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation”. The policy also highlights that through the Mayor’s Academic Forum, an identified need for 3,500 PBSA bed spaces would be required annually. The London Plan does not specify specific targets for each Borough, rather this figure is provided on a city-wide basis.

Council Officers have previously questioned the need or demand for student accommodation within South Acton and the applicant has accordingly presented a PBSA Needs Assessment, prepared by Savills. The report notes that as of 2021/22, there were 15,600 full-time students living in Ealing, which is a 59% increase on 2016/17. Taking into consideration the number of full-time students living within the Borough, there are only 3,200 PBSA beds in Ealing. This results in a ratio of 4.9 students to 1 PBSA room. Accordingly, a significant part of the student population (45%) relies on the private rented sector for accommodation whilst studying, typically living in HMOs. This would accordingly be placing significant stress on existing housing stock. The pipeline for accommodation PBSA beds in Ealing is

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around 2,850 beds and even with the implementation of all these schemes were they to proceed, this would not satisfy the growing demand for this type of accommodation both within Ealing and across London. This is particularly pertinent given the growth rates of students living in Ealing in the last 5-years outlined above.

Of the total number of students living in Ealing, 69% are domestic students, and 31% are international students. The international student sector is growing at a significantly higher rate than domestic students, doubling in numbers since 2016/17 and driven primarily in growth from non-EU students. In benchmarking Ealing against other London authorities, the student to PBSA bed ratio is quite high with 4.9 students to 1 PBSA bed ratio. This is poor compared to other authorities, with a selection provided in the table below:

LGA	Full Time Students	Beds	Ratio
Camden	27,920	13,212	2.1
Islington	18,369	11,252	1.6
Southwark	20,115	9,602	2.1
Tower Hamlets	27,991	9,133	3.1
Lambeth	14,531	4,989	2.9
Westminster	18,932	4,991	3.8
Hillingdon	13,622	5,107	2.7
Ealing	15,582	3,190	4.9
Hammersmith and Fulham	11,875	2,598	4.6
Brent	19,509	4,636	4.2

Of the 3,200 PBSA beds in Ealing, 1,465 (45%) are derived from private providers, whilst 1,725 (55%) are within university-owned halls of residence. An assessment of the existing stock is provided within the table below:

Scheme	No. of Beds	Provider	Provider Type
The Costume Store	730	iQ Student Accommodation	Private
Kemp Porter	710	Imperial College London	University
Woodward Buildings	690	Imperial College London	University
Holbrook House	424	Chapter London (Greystar)	Private
UWL Student Village	325	University of West London	University
The Lyra	211	Downing Students	Private
Central Studios Ealing	100	Fresh Student Living	Private

Whilst there are 3,200 PBSA beds in Ealing currently, there are 2,858 PBSA beds within the pipeline at various stages of the application process. This includes the Hanger Lane scheme that is currently under construction, by Stay Club.

Site Name	No. of beds	Estimated Completion	Status
Stay Club, Hanger Lane	650	2023	Under construction
64 Stanley Gardens	32	-	Permission Granted
5 Park Royal Road	988	-	Application Stage
Holiday Inn, Victoria Road	699	-	Application Stage
1 Portal Way	384	-	Application Stage
Crown Street, London	105	-	Application Stage

Even if all these schemes were to be built out, this would equate to 6,058 PBSA beds across the Borough, bringing the student to PBSA room rate to 2.5. Whilst this would be a significant improvement on the existing situation, such a calculation would negate the exponential growth that has been experienced in student numbers within Ealing in the last 5-years and the continued anticipated growth in numbers, particularly in non-EU students. Accordingly, the principle of student accommodation can be supported as the proposal would seek to meet the needs of current student numbers living within Ealing as well as the anticipated growth that will be experienced within this sector.

In terms of the proposed location of South Acton for PBSA, the proposal is in close proximity to Acton Town Underground Station (Piccadilly and District Lines) that would provide direct access into Ealing Broadway for students at the University of West London as well as Central London universities. It should also be noted that Policy H15 of the London Plan requires that PBSA developments contribute to a “mixed and inclusive neighbourhood”. Given the emerging community in the area and the more established communities of Acton Gardens and Chiswick, the addition of a significant population of the student demographic to the area would provide new opportunities for existing businesses to diversify and expand to meet the needs of this new population group.

A requirement of Policy H15 of the London Plan is that the “majority of the bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider”. This will be secured through legal agreement and forms part of the recommended Heads of Terms outlined above. This requirement is necessary for the development to be classified as PBSA. This nomination agreement will be required from the point of occupation.

The GLA have also advised through their Stage I response that “the provision of student accommodation, in place of the consented Class C3 residential development, is strategically supported”. Based on the proposals ability to meet the current and future need of student accommodation both within the Borough and across London, it is the Officer’s view that the principle of student accommodation in this location is acceptable.

Mix of Residential Units

Whilst Block AB within the Hawkins/Brown Masterplan would be student accommodation, Block JK would remain as Class C3 homes. In accordance with Policy H10 of the London Plan, development proposals should generally consist of a range of unit sizes. A summary of the housing mix proposed within Plot JK is provided within the table below. A total of 95 homes are proposed within this part of the scheme.

Unit Type	No. of Homes	
1b2p	27	27
2b3p	15	60
2b4p	45	
3b4p	4	8
3b5p	3	
3b6p	1	
TOTAL	95	95

As shown within the table above, the proposal would include a healthy mix of unit sizes to accommodate the needs of different types of residents and families within the Borough.

Affordable Housing

The Mayor of London has set a strategic target of 50% of all new homes delivered across London as being genuinely affordable, as outlined within Policy H4 of the London Plan. The Draft Local Plan reiterates this strategic target within Policy HOU. All major developments across London are required to provide affordable housing provision within their schemes. The threshold approach to affordable housing as outlined by Policy H5 of the London Plan states that a minimum of 35% of housing, calculated by Habitable Room, shall be required to follow the Fast Track Route (not requiring a viability assessment).

This application does not consist of a conventional housing product, with one building (Block AB) to be delivered as PBSA and one building (Block JK) being delivered as conventional homes within Class C3. It should be noted that all the homes delivered within Block JK would constitute affordable housing. Therefore, the Class C3 homes being delivered as part of the scheme would be 100% Affordable Housing.

However, in accordance with London Plan policy, both PBSA and Class C3 homes are both required to deliver Affordable Housing as part of their schemes and no PBSA rooms that meet the Mayor’s definition of affordable housing are proposed. The Affordable Housing provision would be therefore entirely delivered through Class C3 residential dwellings. In combining the number of habitable rooms across the development, the proposal would provide for 38% Affordable Housing (in line with the consented scheme). This is demonstrated within the table below:

Residential Type	No. of Habitable Rooms	Percentage
Affordable Housing	266	38%
- London Affordable Rent	147	
- Shared Ownership	119	
Student Housing	429	62%
Total	695	100%

The proposal therefore satisfies the requirements of Policy H5 and is eligible for the fast-track route.

In terms of the tenure split, Policy 3A of the Ealing Development Management DPD seeks a split of 60/40 in favour of social or affordable rented accommodation over intermediate products. The Draft Local Plan is seeking an uplift through Policy HOU to 70/30 in favour of social or affordable rented accommodation. Whilst the proposal would not meet these targets, it must be noted that the scheme would be delivering 38% Affordable Housing. Were the scheme to be reduced to 35% affordable housing, it would still be able to meet the target threshold for the Fast Track Route and would provide a compliant tenure split of 60/40.

The tenure split would equate to 55/45 (when calculated by Habitable Room) in favour of London Affordable Rent. The previously approved scheme (214611FUL) also proposed a tenure split of 55/45 in favour of London Affordable Rent. Notwithstanding this, the proposal would result in an uplift in the number of affordable homes from the previous scheme from 87 to 95, resulting a significant public benefit to the proposed development. A summary of the tenure split is shown within the table below:

Tenure Split by No. of Homes

Housing Type	LAR	Intermediate	Total
One bedroom	8	19	27
Two Bedroom	33	27	60
Three Bedroom	8	0	8
Total	49	46	95

Percentage	51.5%	48.5%	100%
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Tenure Split by HRs

Housing Type	LAR	Intermediate	Total
One bedroom	16	38	54
Two Bedroom	99	81	180
Three Bedroom	32	0	32
Total	147	119	266
Percentage	55%	45%	100%

As such, the affordable housing provision within the scheme is considered to be acceptable. This is also noted by the GLA, who have stated within their Stage I response that “the provision of 38% affordable housing by habitable room, with an appropriate tenure split, is supported and eligible for the fast-track route”.

Design, Character and Scale

Section 12 of the NPPF, London Plan Policies D1, D3 and D4 of the London Plan (2021) and Ealing Local Variation Policy 7.4 and Policy 7B of the Ealing Development Management DPD (2013) require new buildings to complement their street sequence, building pattern, scale, materials and detailing and to have high quality architecture. New buildings should also conform to the height, scale and proportions of existing forms of development within the immediate area, in order to define a sense of place.

The NPPF demands that development shall achieve well designed spaces and encourages early engagement with Council’s to develop designs that respond positively to the local area to create “high quality, beautiful and sustainable buildings”. Similarly, Policy D4 of the London Plan states that developments should be given scrutiny at an early stage through the use of Design Review Panels (DRPs). Whilst this application was not subject to a Design Review Panel or Community Review Panel, the previous application that was consented by Council (214611FUL) was presented to the DRP, with their considerations presented to the November 2021 Planning Committee. Given the relatively minor changes in the massing, scale and overall external appearance between the consented and proposed schemes, advice was sought from the GLA during the preapplication process as to whether the DRP and CRP process would be necessary in this particular instance. The GLA confirmed that this would not be necessary.

A material consideration in the assessment of the appropriateness of the design, character, scale and massing is the previous consent given by Council on the application site. Through both pre-application discussions with the applicant and with the GLA, Council Officers advised the applicant that the Council would not be supportive of any additional height within the scheme. Council Officers have accordingly encouraged the applicant within their revised scheme to generally accord with the design principles set by the existing consent.

In terms of Block AB (“the student accommodation”), the proposed change to the external appearance required additional consideration. The consented scheme was for residential dwellings within Class C3 and the external walls of the building included a regular pattern of inset balconies within the façade. This provided a high degree of articulation and variation that broke up the massing of the development. As there is no requirement within PBSA schemes for private amenity areas to be provided, any such

proposal to simply infill these spaces would have resulted in a greater overall bulk and massing than that which was approved.

Accordingly, the design of the building was further considered, which resulted in some significant design interventions, as shown in the image below:



Figure 09: Consented Scheme (left) vs Proposed Scheme (right) for Blocks AB

The key changes to the external appearance of Block AB are summarised below:

- An expressed grid-like frame constructed of light grey brick with recessed infill metal panels provide for variation within the façade.
- A slight setback of the two shoulders of the building (7-storeys to Bollo Lane and 18-storeys to Stirling Road) to the Colville Road frontage to further break the overall massing of the building.
- A more pronounced base, middle and crown to the development, with the frame at the top of the building elongated to provide a clear differential with the floors below.
- A clear grid-like fenestration pattern, including openings that are inserted into the façade at regular intervals.

It is therefore clear that adequate design interventions have been made within the proposal to both facilitate the design changes required to alter the land use from residential dwellings to student accommodation, whilst retaining a high quality and elegant external appearance that would be a significant improvement to the character and appearance of the area.

It is noted that at face value, the height of the proposed development of Block AB would increase from the consented 19-storeys to the proposed 20-storeys. Several residents through the consultation noted that the scheme was 23-storeys in height, however this is factually incorrect. Whilst Block AB would increase in height by 1-storey, it must be noted that the internal floor-to-ceiling heights are different between developments containing Class C3 residential dwellings and PBSA. Policy D6 requires that Class C3 uses maintain an internal floor-to-ceiling height of 2.5 metres, however PBSA schemes revert to the floor-to-ceiling heights prescribed by the Technical Housing Standards, being 2.3 metres. The 0.2 metre height difference at each floor has allowed the insertion of an additional floor within the scheme, whilst keeping the development within the parameters set by the extant permission.

In fact, despite the development increasing in height by 1-storey, the overall height of the development would actually reduce by approximately 2.25 metres when compared with the consented scheme. This is shown within the image below, with the existing scheme being highlighted in grey and the proposed scheme highlighted in blue.

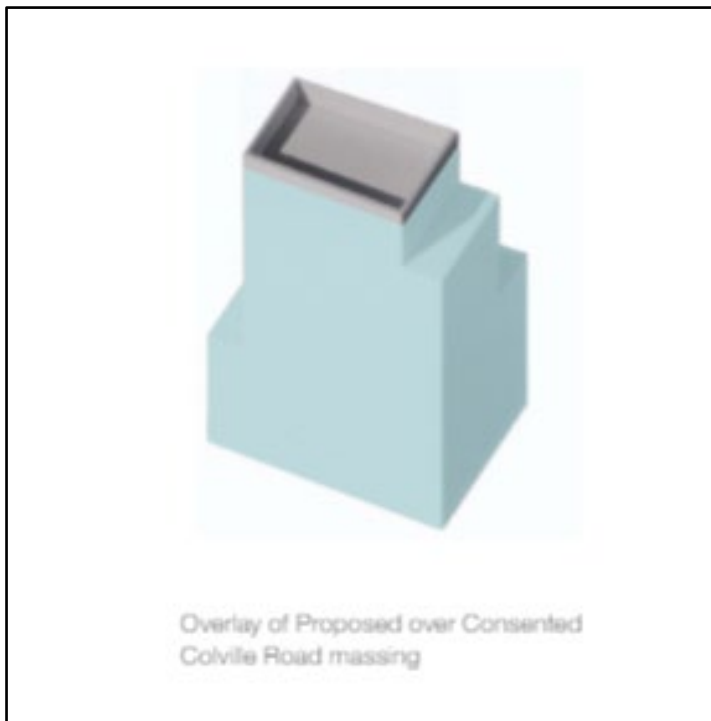


Figure 10: Overlay of Proposed Over Consented Schemes for Blocks AB

The scheme at Blocks JK would retain the overall general appearance of the building when compared with the consented scheme, as well as the overall height and number of storeys. The key difference in the scheme is the elongation of the taller element of the scheme that would extend over the lower 8-storey shoulder of the building that is positioned in the northern portion of the site. The main reason for this change is in response to the requirements for a second staircase to be implemented in response to new fire safety regulations. Whilst there is some additional bulk created, the scheme has the net benefit of delivering a net uplift in 8 affordable homes when compared with the previous scheme.

Other design changes include some inward facing inset balconies on the 8-storey shoulder being replaced with projecting balconies and the removal of some inset balconies from the rear elevation facing Stirling Road. The fenestration pattern and balcony arrangement on the main bulk of the scheme has also been amended to reflect the new internal floor plans and still retains a high degree of uniformity and articulation in its appearance. At the rear elevation (facing Stirling Road) there is the replacement of some inset balconies with projecting balconies and the creation of a greater setback from the street for a portion of this elevation to better align with the building line established by 2-10 Roslin Road. The key differences are demonstrated within the images below.



Figure 11: Consented and Proposed Scheme for Block JK (from Bollo Lane)



Figure 12: Consented and Proposed Scheme for Block JK (from Stirling Road/Roslin Road Junction)

Key benefits of the scheme are retained, including the attractive entrance feature on Bollo Lane that marks an entrance point into a central courtyard, providing separate residential and industrial access points. This central courtyard has been designed in a way to encourage interaction by blending private and public space that would be accessible to all. The gap created by this central courtyard will also provide some visual relief to the emerging development occurring on Bollo Lane

The design of this entrance provides for a legible identity to the building within the streetscape. It takes the form of a metalwork bridge that is both functional and reflects the history of the area. It provides an external link between the first floors of the industrial space and additional amenity for workers. It's metallic-like material provides a relationship between the development and the site's industrial heritage.



Figure 13: Metal Bridge Link between first floors of the building for Blocks JK

Ground floor improvements that will be delivered as part of this scheme will help both sites better engage with the street and provide better opportunities for passive overlooking of public spaces, improving the safety and security of the area. The application site, particularly the Bollo Lane frontages, provide a hostile and unwelcoming environment for footpath users and better engagement of the buildings with the street will create a more pleasant and accessible space for those walking or cycling through the area.

The bottom floors of the buildings, containing the industrial uses, are clearly separated through their design to the more residential components of their respective buildings. Both buildings clearly maximise their opportunity to provide active frontages, improving their engagement with the street. The commercial spaces for Block AB will typically have a brick frame that is infilled with bronze coloured metal panelling and glazing. The frames of the windows and doors would also adopt this materiality, providing a reference point to the industrial heritage of the surrounding area.



Figure 14: Commercial Bay Design for Block AB

Similarly, Block JK establishes its own character that is distinct from that of Block AB, giving the building its own individuality but still referencing the industrial character of the area. The ground floor of this façade would have strong precast concrete colonnade, with this materiality also reflected in the windows proposed at first floor. Bronze coloured metalwork, windows and doors and ventilation panels would provide additional visual interest, resulting in a building that better engages with the street.



Figure 15: Commercial Bay Design for Block JK

Overall, the design of the buildings shows a high-quality architectural expression and are generally in accordance with the design principles and parameters that have been accepted by Council under the consented planning application. The GLA through their Stage I response are also supportive of the overall design approach of the development, noting its general consistency with the consented scheme.

Tall Buildings and Impact on Heritage

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

The Draft Local Plan Policy D9 goes further in defining what constitutes a tall building in different zones/areas within the Borough. In the context of the Draft Local Plan, the site would fall within area A7, which sets a tall building at a height of 28 metres or 8 storeys. Emerging planning policy states that tall buildings should be located on allocated sites, which is in line with Policy D9(B) of the London Plan. Whilst the site is not specifically designated for a tall building, the existing consent remains a material consideration. It should also be noted that the proposed scheme has an overall lower height, albeit marginal, than the consented scheme. The GLA are in agreement with this assessment stating within their Stage I response that “the proposal is not located within an area that is identified as suitable for tall buildings. Nevertheless, the height of the built form is lower than that previously consented and does not raise any strategic concerns”.

The Committee Report for the consented scheme carried out a full Townscape and Visual Impact Assessment, in line with the requirements of Policy D9 of the London Plan, with the results of these presented to the November 2021 Planning Committee. This assessment showed that the proposed buildings within both their proposed and emerging contexts, particularly in the context of the planned TFL scheme on the south-western side of Bollo Lane, are consistent with the emerging pattern of development within the local area. Whilst the consented scheme did not comply with Policy D9(B) of the London Plan as it is not located on an allocated site for tall buildings, it was considered to comply with Policy D9(C), given that the visual impact of the proposal in the context of the emerging development pattern was determined to be minimal.

As with the consented scheme, the applicant has produced a Townscape, Heritage and Visual Impact Assessment (THVIA) to demonstrate compliance with Policy D9(C). This demonstrates the impact of the proposal within long-, mid- and immediate views of the application site. The application site is surrounded by a number of tall buildings that have been consented in the immediate area, which is demonstrated below. This image shows the proposed development (green) in the context of tall buildings either consented or under construction (orange).



Figure 16: Emerging Development within the surrounding area

Prior to the submission of this development application, the applicant agreed with Council Officers the baseline, outlining specific locations for the study of long-, mid- and immediate views and the visual receptors that may experience an impact. These locations were carefully selected to ensure that the locations weren't overly selective, in order to give a true impression of the visual impact where it may be experienced. The report also assessed the development in accordance with the emerging context, taking into consideration consented schemes, particularly that of the TFL scheme.

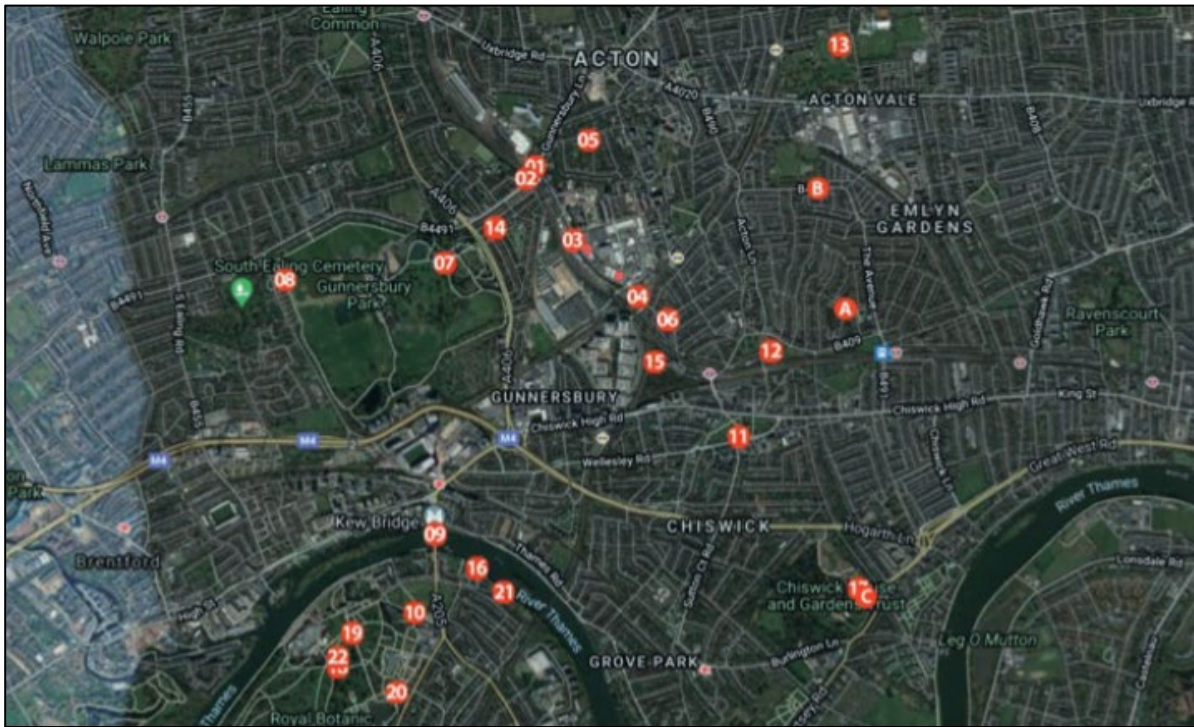


Figure 17: Locations of Study for THVIA

When viewing the application site from Gunnersbury Lane (adjacent to the Acton Town Underground Station), the proposed development (illustrated in green) would be dwarfed by the more prominent TFL scheme, which appears in the foreground, with the development being completely screened. This is a similar outcome when viewing the development from the roundabout junction of Gunnersbury Lane and Bollo Lane. This is illustrated in the image below.



Figure 18: Cumulative Visual Impact from Gunnersbury Lane

In other longer-range views, of particular note is that to the south of the site, exists the lower-level conventional housing of Acton Green. The development would be most visible from the junction of Bollo Lane and Rothschild Road. Whilst at this point the proposed development would be visible at this location, it will be seen in the context of the TFL development, particularly the 25-storey tower which has detailed planning consent within this scheme, and which would be significantly more prominent within the streetscape. In the image below, the proposed development of Block AB is shown within the context of the Pocket Living Scheme and other consented development in the surrounding area.



Figure 19: Render of Proposed Block AB (right) with Pocket Living in foreground and emerging development.

Moving closer to the application site, a similar conclusion is reached. At the railway crossing across Bollo Lane, the development appears prominently as shown in rendered format within the image below. Taking into consideration the emerging schemes, including the TFL Scheme and other schemes being delivered with the urban block that is defined by Bollo Lane and Stirling Road, the scheme would not result in an undue visual impact and would facilitate the regeneration of a tired and visually unappealing site. This would be achieved whilst delivering more modern industrial space and delivering new homes. The prominent location of the site on the entrance to this area and fronting three roads would also act as a visual reference point that would emphasise the hierarchy of the place as an emerging centre of activity.



Figure 20: Proposed Development at Block AB and the emerging development context

Further north, the proposed Block JK would be effectively screened when facing a southerly direction on Bollo Lane. The development currently under construction at 2-10 Roslin Road has a height of 15-storeys and is positioned on the northern side of the application site. Thus, the bulk of the development would not be readily seen within the public realm and therefore the visual impact is considered to be negligible. The elements of the continuation of the building line along Bollo Lane would be visible, which is a positive design outcome as it would highlight the improvements being made to the streetscape and public realm along Bollo Lane.



Figure 21: Plot JK viewed from Bollo Lane

In considering the visual, functional, environmental and cumulative impacts of the proposed scheme, and in line with the previous consent given over the application site, it is considered that the application site can be considered appropriate for a tall building in accordance with Policy D9(C) of the London Plan. This is consistent with the advice of the GLA, who state within their Stage I response that “the functional and visual impacts are generally acceptable in strategic planning terms, whilst the environmental and cumulative impact assessment will be concluded at Stage 2”.

Heritage

Tall buildings can also have an impact on designated heritage assets within the vicinity of the site, which reinforces the importance of the Townscape and Visual Impact Assessment outlined within Policy D9 of the London Plan.

The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for managing designated heritage assets in planning decisions. In relation to conservation areas, a local planning authority must pay special attention to “the desirability of preserving or enhancing the character or appearance of that area”. Government guidance on how to carry out those duties is found in the National Planning Policy Framework (NPPF). At the heart of the framework is a presumption in favour of ‘sustainable development’ of which protecting and enhancing the historic environment in a manner appropriate to its significance is established as an environmental objective.

Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced and makes it clear at Para 193 that when considering the impact of a proposed development on a heritage asset, local planning authorities should give 'great weight' to preserving the asset's significance, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 202 states that where there is less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Policy HC1 of the London Plan (2021), states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. Policy 7C of the Ealing Development Management DPD also states that development within of affecting the setting Conservation Areas should retain and enhance characteristic features and avoid undermining the significance of the Conservation Area. In addition, as stated within Policy LV7.7 of the DPD, tall buildings can have a greater impact on their surroundings and the Borough, including the heritage context and local heritage assets and must be held to higher standards.

The Townscape, Heritage and Visual Impact Assessment referred to in the previous section also outlined a number of heritage receptors that may be impacted by the proposed development. It must be noted that within the immediate surroundings of the application site, there a limited to negligible heritage assets, with the most notable exception being Frank Pick House, which is opposite the application site. This building exists on Council's local heritage register. It must be noted that as part of the redevelopment of the western side of Bollo Lane for the TfL Scheme consented under ref: 201379OUT, this building shall be demolished. Nevertheless, there is a spatial separation of the application site from Frank Pick House by virtue of a wide carriageway and dense vegetation on its western side. Accordingly, the impact of the development on the heritage value of this building is limited.

To the north of the site lies the Mill Hill Park Conservation Area, with the closest part of the proposed development being located some 350m away. From the majority of the Conservation Area, the development is obscured from views by the existing buildings, with glimpses of the development available from Avenue Crescent. However, on the whole, the tree canopy existing within this road obscures a significant portion. This is demonstrated within the image below, with the development shown (in green) within the area's emerging context.



Figure 22: View of Development from Avenue Crescent/Avenue Road

The most significant heritage assets exist within long-range views and include Gunnersbury Park (Grade II Listed) and its surrounding Conservation Area, Strand on the Green Conservation Area (within the LB Hounslow) and Kew Gardens (World Heritage Site). A number of other Conservation Areas were tested, however in these instances, the development is generally completely obscured from view.

In taking into the cumulative development within the surrounding area, the proposal would have a negligible impact on views from within Gunnersbury Park. Not only is the TFL scheme more prominent and would sit in front of the proposed development, significantly obscuring views, dense vegetation within the park also minimises any views of the proposed development, as shown within the image below:



Figure 23: View of Emerging Development from Gunnersbury Park

Similarly, in taking consideration of views of the Strand On The Green Conservation Area (LB Hounslow) the proposed development within a cumulative context would be dwarfed from more prominent parts of the TfL Scheme that would obscure the majority of the proposed development. Impact on the most prominent views of this Conservation Area would accordingly be negligible.



Figure 24: Strand on The Green Conservation Area

Several viewpoints were also tested within the Kew Royal Botanic Gardens, with the most obvious view of the site being from the Mound at Temple of Aeolus. However, even in this instance, the development is consistent with the emerging pattern of development, with the proposed development (in green) largely obscured from view by the emerging pattern of development (in orange). Accordingly, the impact in this location is considered to be negligible.



Figure 25: Kew Royal Botanic Gardens

Based off the heritage assessment that has been carried out, it is considered that the proposed development would lead to less than substantial harm to the significance of all relevant designated heritage assets. Paragraph 202 of the NPPF (2023) states that in such instances, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.

Of relevant consideration is also that the scheme proposed is slightly lower than the previously consented scheme and therefore there would be no additional impacts over and above what Council has consented under application ref: 214611FUL. In any case, the proposed development would deliver significant benefits including additional affordable housing provision, over and above what has already been consented. The scheme would also meet an identified need (as outlined above) for additional student accommodation within both Ealing and London. The scheme would also provide for the full provision of industrial space in a more modern and flexible layout, which would have benefits on the local economy and job growth. The public benefits of the proposal are considered to significantly outweigh any harm caused to designated heritage assets and the proposal would accordingly comply with the objectives of NPPF, as well as Policy 7C of the Ealing Development Management DPD and Policies D9(C) and HC1 of the London Plan.

Impacts on Neighbouring Properties

Policy 7B of the Ealing Development Management DPD seeks to ensure that new residential development does not materially harm the living conditions of neighbouring properties. Policy D6 of the London Plan (2021) also requires that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. The Draft Local Plan Policy DAA makes clear that the responsibility for mitigating any adverse impacts upon neighbouring properties lies with the new development and that development should “protect sensitive uses, within or outside the development, provide good levels of daylight and sunlight and privacy”.

Based on the existing situation, in its immediate context, there are no significant sensitive receptors with the proximity of the application site, by virtue of the area being predominantly industrial in character. The closest sensitive receptor to the application site to Block JK is the building currently under construction at 2-10 Roslin Road. This context is shown within the image below:



Figure 26: Proposed Block JK against 2-10 Roslin Road (Phase 1)

It must be noted that the development currently under construction at 2-10 Roslin Road was designed in the knowledge that development may come forward on the application site within the future. Indeed, the applicant is the same for both applications. As such the flank wall of 2-10 Roslin Road is generally blank, with no habitable rooms facing toward the application site. As part of the consent for 2-10 Roslin Road, each of the habitable rooms within that building were tested to ensure that adequate daylight and sunlight would be received. The test results of the proposed development show no substantial change to the existing position and would accordingly be acceptable.

Similarly, the consented scheme for Block AB undertook an assessment on the impact of a concurrent scheme, that was also approved by Council, at 3-15 Stirling Road. The results of the Daylight and Sunlight Assessment show that there is no material difference in impact when comparing the consented and proposed schemes. This is also an obvious conclusion, as the proposed building is within the parameters of the consented scheme and even marginally lower. As such, any impacts of the proposed development on the consented scheme at 3-15 Stirling Road are negligible. The report also has the same conclusions for the TFL scheme on the opposite side of Bollo Lane.

In terms of surrounding areas, to the north of the site lies Acton Gardens. However, the development of Block JK is obscured by the height of the building under construction at 2-10 Roslin Road and the proposal would therefore not have any material impact. Similarly, the development of Block AB would not have a material impact on lower-level residential properties in Acton Green, to the south of the

railway line. The image below shows an overshadowing study, showing that the proposal would have no material shading impact on these residential properties.

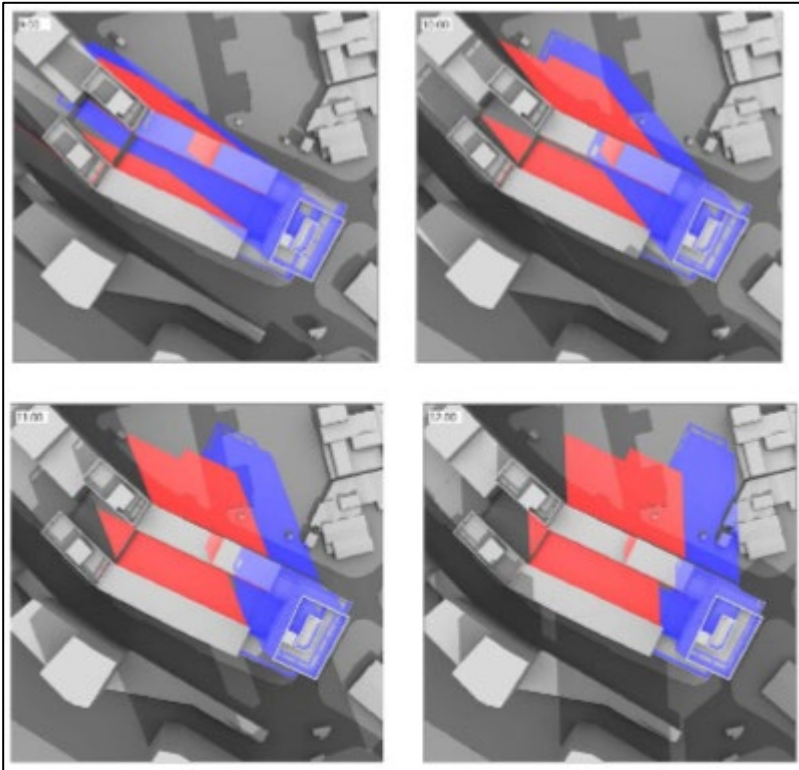


Figure 27: Overshadowing Assessment for Block AB on 21 March

Quality of Accommodation

Block AB (Student Accommodation - PBSA)

Unlike conventional residential dwellings within Class C3, PBSA schemes do not set minimum internal or external space standards. Rather, Policy H15 of the London Plan states that such developments should provide “adequate functional living space and layout for the occupants”. In this instance, the 429 PBSA beds proposed would be arranged in both “studio” and “cluster” format, offering different types of accommodation for future students.

A studio unit within this PBSA scheme would generally contain self-contained residential accommodation with residents having access to their own bathroom facility, small desk, kitchenette and bed/sleeping area. Of the 429 rooms proposed, the studio units would equate to 200, representing 46.6% of the total provision. The studio rooms would be compact in design and provide all the daily necessities for students occupying these rooms.

The studio units have a range of sizes between 16.5sqm and 20.5sqm, with the average studio size being 16.9sqm. The applicant has presented, within their Design and Access Statement, different typologies of studio flats and how the size of the room could accommodate necessary furnishings. The image below shows a smaller studio room and how this could be reasonably arranged to accommodate these basic requirements.



Figure 28: Typical Studio Flat Layout

Therefore, whilst the room represents a compact form of living space, it serves as a functional space for a single occupant and would provide a good standard of living. Residents of the studio rooms would also have access to the extensive amounts of amenity areas that are proposed within the building, which will be discussed within a subsequent section of this report.

The other living arrangement within the development would be through “clusters” of accommodation. Clusters would be made up of individual rooms which share a common kitchen and living area. Cluster rooms would effectively take the form of a bedroom with ensuite bathroom. They would range in size from 12.7sqm to 17.3sqm, with average room size being 13.9sqm. Whilst this is also a compact form of living, these sizes would exceed the standards of a “double bedroom” as defined by the Technical Housing Standards (11.5sqm).

The development would be comprised of 42 separate clusters, creating a total of 229 rooms. There would be different sized clusters as is demonstrated within the table below:

Cluster Type	Total Number
4-bed cluster	8
5-bed cluster	11
6-bed cluster	21
8-bed cluster	2

The arrangement of each of the rooms would be able to accommodate the necessities of students that would occupy these rooms. Adequate space would be provided for an ensuite bathroom, bed/sleeping area, wardrobe, and study desk, all whilst retaining adequate circulation space. The typical layout of the smallest cluster room is shown within the image below.



Figure 29: Typical Cluster Room Layout

As described above, each cluster room would provide access to a communal amenity area that would provide for a shared kitchen and lounge area. This amenity area would only be accessible to the rooms within that respective cluster. The smallest sized amenity area would be 23sqm, with the largest being 40.3sqm. The size of the cluster amenity area is generally reflective of the size of the individual cluster, with the largest amenity area, for example, being for an 8-bedroom cluster. Overall, the cluster amenity provision would equate to an average size of 4.8sqm per room. This does not include the wider amenity areas that would be provided elsewhere within the building, as is discussed within the “Amenity Space” section of this report.

The image below shows a typical floor layout within the building, which shows the location of different types of accommodation within the building, and how the cluster arrangement would be laid out. None of the proposed rooms would be single aspect, north-facing and would provide adequate levels of daylight and sunlight.



Figure 30: Layout of Floors 2-6

As has been outlined above, the living areas proposed within the PBSA element of the scheme are well-considered and would provide good quality living conditions for future residents. This part of the proposal would accordingly comply with Policy H15 of the London Plan.

Block JK – Class C3 residential dwellings

Policy D6 of the London Plan outlines minimum internal space standards for new residential development. As outlined within the Housing Mix section above, the proposal would provide different accommodation options that have individual space standards based on both number of rooms, as well as occupancy.

The table below shows an assessment of the proposal against the minimum space standards of the London Plan.

Unit Type	No. of Homes	Minimum Requirement	Size Range	Complies?
1b2p	27	50sqm	50sqm – 53sqm	Yes
2b3p	15	61sqm	61sqm – 73sqm	Yes
2b4p	45	70sqm	71sqm – 72sqm	Yes
3b4p	4	74sqm	88sqm	Yes
3b5p	3	86sqm	88sqm – 95sqm	Yes
3b6p	1	95sqm	95sqm	Yes

As the table demonstrates, all of the proposed homes within this building would provide for compliant internal living areas, with many of the homes to be delivered providing internal areas in excess of the minimum space standard.

Policy D6 of the London Plan and Policy 7D of the Ealing Development Management DPD outline minimum standards for private amenity space, which in developments such as this, generally take the form of a balcony. In all instances, each proposed home would provide for a balcony space. The requirement set by Policy 7D is that a 1-2 person flat should provide for 5sqm, with an additional 1sqm per additional occupant. This has been assessed and each flat would provide a balcony that meets the relevant space standard based on their occupancy.

Section diagrams show that the residential areas within the scheme would provide for internal floor-to-ceiling heights of 2.5 metres, that meet the relevant standards of Policy D6 of the London Plan. The policy also outlines the benefits of dual aspect homes over single aspect, which include better daylight, greater choice of direct sunlight for longer periods, natural cross-ventilation, choice of views, and a greater capacity to address overheating. Where single aspect homes are proposed, these should demonstrate that all HRs are equipped with passive ventilation, privacy and daylight and that their orientation enhances amenity, including views.

Given the design of the scheme, it would not be possible to design a scheme whereby all of the homes would be dual aspect. The applicant has worked with Council Officers through the pre-application process to design the best possible layouts of homes within the development. This includes providing, particularly along the Stirling Road frontage, “enhanced” single-aspect homes. This involves providing an angled wall into the living room space from the balcony, which provides for an improved outlook from the internal area of the homes and allowing for a greater distribution of daylight and sunlight into the living space. This is best illustrated through the images below, demonstrating the benefits that this enhanced single-aspect flat type can bring against a more conventional single-aspect flat.

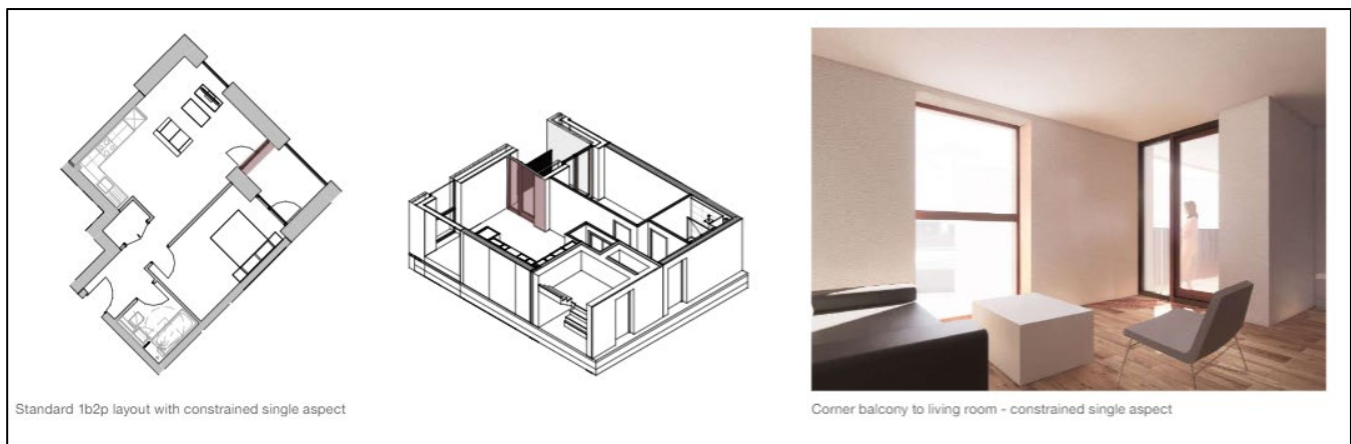


Figure 31: Conventional single-aspect flat

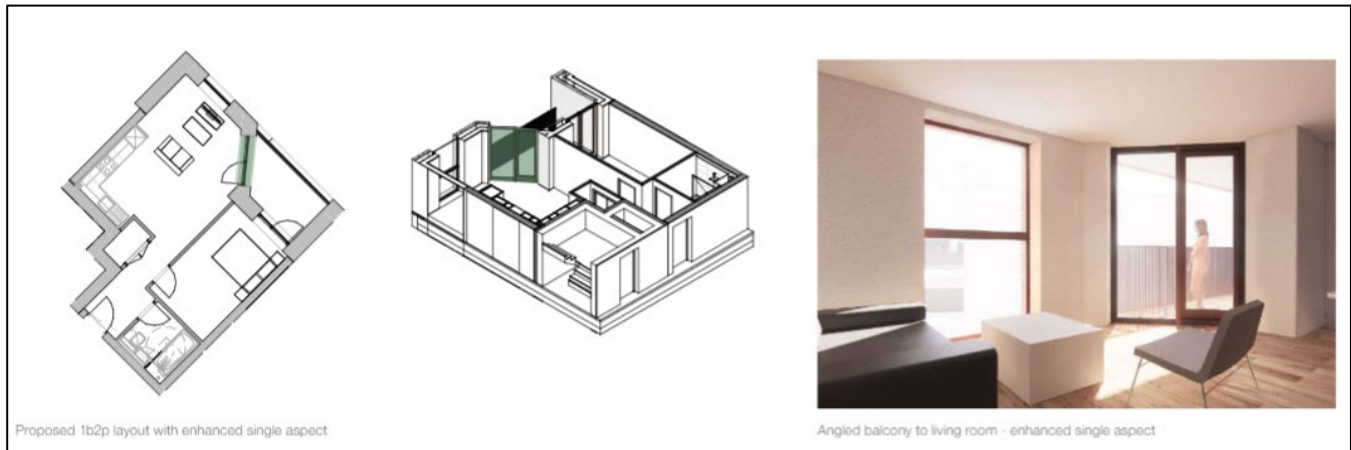


Figure 32: Enhanced single-aspect flat

In terms of the percentage of single-aspect homes proposed within the scheme, the scheme would deliver a relatively high percentage of single-aspect homes. The scheme would deliver homes that are 86% single-aspect and 14% dual-aspect. However as shown above, the applicant has sought to design these homes to enhance the opportunities in these single-aspect homes have for increased outlook, daylight and sunlight distribution and ventilation. As shown above, many of the dwellings facing Stirling Road will adopt the angled wall design to the balcony. Whereas, on the Bollo Lane frontage to the site, an alternative option is used, whereby the glazing on the side wall of the balcony wraps around the wall to the front elevation of the building. This is demonstrated within the image below.

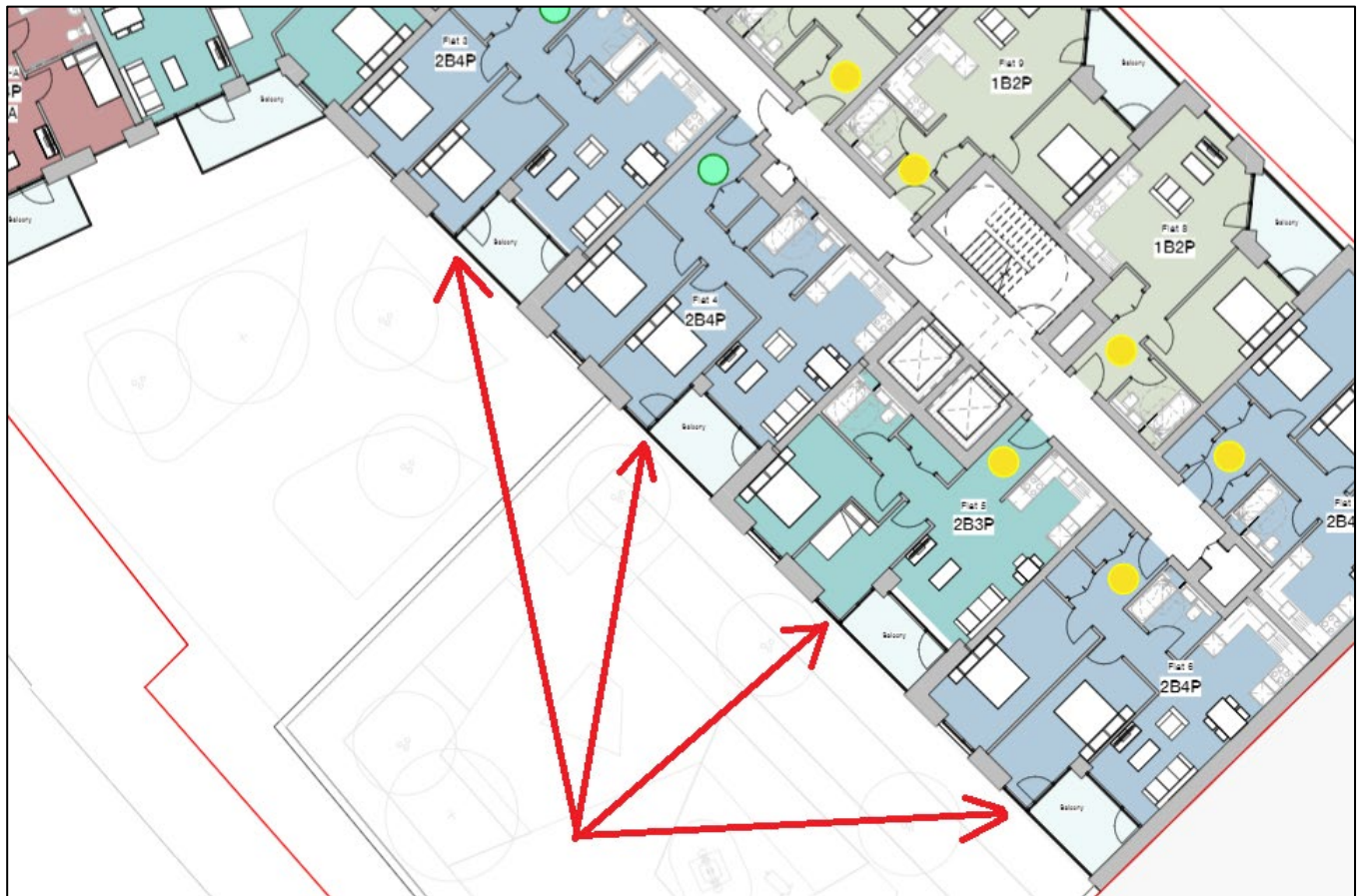


Figure 33: Locations of wrap-around glazing to single-aspect homes

Whilst there are a high percentage of single-aspect homes, this is broadly consistent on a percentage basis with the consented scheme. It is also worthy of note that none-of the proposed single-aspect homes would be north-facing. Despite this relatively high percentage, the applicant's Daylight and Sunlight Assessment has been scrutinised against relevant BRE Guidance.

In 2022, BRE Guidance was updated to propose an alternative test using target lux values. The test applies minimum target illuminance levels to be achieved across 50% of a reference plane set at 850mm above the floor. The corresponding target values are 100 lux for bedrooms, 150 lux for living rooms and 200 lux for kitchens, which seeks to mimic the traditionally applied ADF (Average Daylight Factor) targets. The minimum target illuminance should be at least half of all available daylight hours.

The overall results show that of the 266 habitable rooms tested within Block JK, 242 of these rooms meet this BRE criteria. This is a high level of compliance and is considered to be a very good outcome for this urban location. The report also notes the improvement from the consented scheme, whereby the proposed scheme has rationalised some of the deeper living spaces proposed within the scheme to achieve better daylight distribution. BRE Guidance recognises that full compliance is a very difficult task and at times unachievable. Accordingly, BRE Guidance should be applied flexibly, which is reinforced by Policy D6 of the London Plan.

Given the above, it is considered that the proposed residential accommodation will provide a very high standard of amenity and will provide good quality living conditions for future residents. Accordingly, it is considered that the proposed development would comply with the requirements of Policy D6 of the London Plan.

Communal Amenity Space, Landscaping and Children's Play Space

In accordance with Policy 7D of the Ealing Development Management DPD, developments are required to provide outdoor open space within their respective schemes. The policy provides guidance for different types of uses, with the residential scheme (Block JK) needing private and communal open space, children's play space and allotment provision, whereas the PBSA scheme (Block AB) requiring only communal open space.

Block JK (Class C3)

The development would provide for communal open space and children's play space at both Level 2 and roof level. First taking into consideration the open space provision requirements, the policy requires that 1,425sqm of both private and communal amenity space must be provided for within the scheme. This is based on a minimum requirement of 15sqm per residential unit, as outlined by the policy. For completeness, a maximum of 5sqm of floorspace per unit for private amenity space is attributable to the overall provision.

Based on the requirements of Policy 7D, amenity provision within Block JK should be a minimum of 1,425sqm. As alluded to above, each balcony provided within the scheme receives a 5sqm credit towards amenity provision and therefore this credit would be 475sqm. Therefore, the total community on-site provision should be 950sqm.

The general arrangement for amenity space within the development is shown within the image below. Children's Play Space will be discussed within the following section, however, as the image notes that this would be located on the second-floor level and also on the rooftop level. Communal amenity space would be provided at the ground floor level, at the entrance to the building, whilst also providing a communal rooftop garden that features dense vegetation.

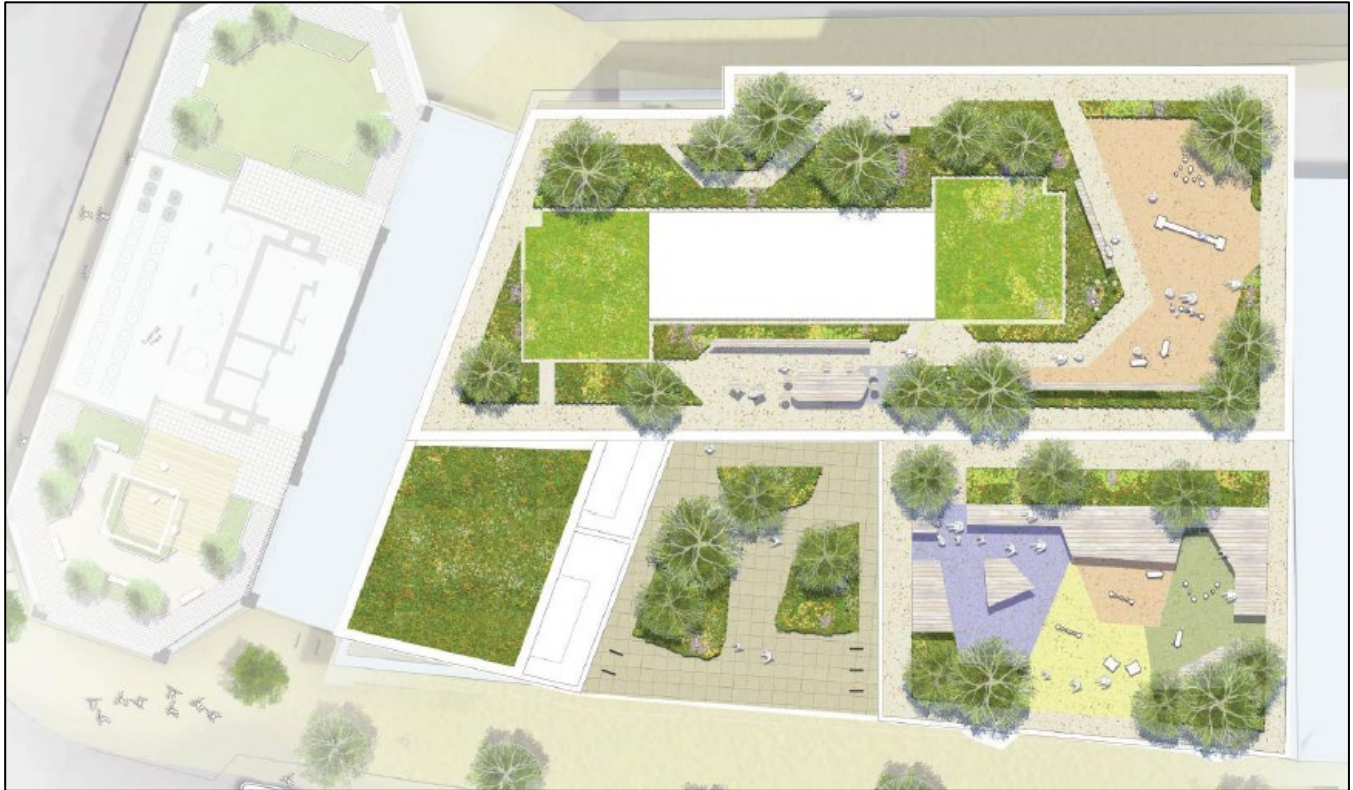


Figure 34: Communal Amenity and Childrens Play Space provision – Block JK

The proposal would deliver 330sqm of communal amenity space at roof level and a courtyard space at ground floor level equating to 145sqm. Whilst it is noted that the ground floor courtyard will be a semi-private space, with public access allowable, this will make an important contribution to overall public realm improvements and is considered to be appropriate to calculate this within the total amenity provision. Therefore, the proposal would deliver collectively 950sqm of amenity space, resulting in a shortfall of 475sqm. This attracts a financial contribution that is outlined within the Heads of Terms above.

Whilst it is noted that the proposal represents a shortfall, this is common within new developments on constrained sites. This financial contribution could support the delivery of additional open space provision within the South Acton Masterplan which is currently being drafted. Nevertheless, the proposed open space provided is considered to be good quality and useable and would provide future residents with good quality living conditions.

Children’s Play Space

Based off the GLA Population Yield calculator, Block JK has a projected yield of 44.5 children. In accordance with the GLA Benchmark, developments should provide children’s play space at rate of 10sqm per child, which is reinforced by Policy S4 of the London Plan. This would generate a total requirement for Block JK to provide for 445sqm of children’s play space within the scheme. The population yield calculator also shows the age distribution of children, with the slight majority within the scheme for ages 0-4 over ages 5-11, as shown in the graph below:

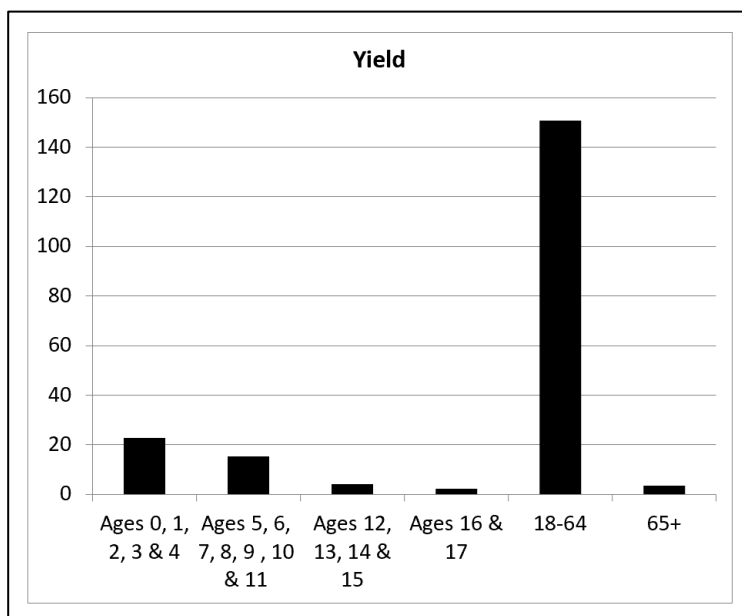


Figure 35: Population Yield within Block JK

The proposed development would provide for a 230sqm of children’s play space at Level 2 and 109sqm at roof top level. The play area at Level 2 would provide space for predominantly 0-4 year olds, with seating surrounding the area for parents, interspersed with planting to soften the area and provide shade. Roof level would prove play areas designed for both 0-4- and 5–11-year-olds. Younger groups would be provided with interactive play features, whereas older age groups would be designed for through sculptural play and furniture. The full details of children’s play space have been requested through conditions.

Whilst the collective children’s play space (339sqm) falls short of the minimum requirement of 445sqm, this shortfall (-106sqm) will be made up for through a financial contribution, as is allowable by Policy 7D. In any case, the provision is considered to be acceptable and any further increase in children’s play space within the development would compromise the delivery of communal amenity space within the development. It is considered that total open space provision provides a good balance between general open space and children’s play space. Financial contributions may also provide funding for open space and play space provision through the delivery of the wider South Acton LSIS Masterplan.

Allotment Provision

In accordance with Policy 7D of the Ealing Development Management DPD, developments consisting of between 10-149 homes are expected to make a contribution toward allotment provision within the Borough. The policy makes clear that this should not be on-site provision and notes that this should be a financial contribution only. A financial contribution based on an established calculation method has accordingly been agreed and has been detailed within the Heads of Terms.

Block AB (PBSA)

Policy 7D of the Ealing Development Management DPD sets out a different metric for the calculation of open space, being a total of 50sqm of open space per 1000sqm of floor area. Based on the cumulative total of all PBSA rooms, the development would provide for 5,897sqm of floor space. Based on the above metric, this would generate a total requirement of 295sqm.

The proposal would provide a rooftop open space area within the development of 230sqm. It must be noted that this relates only to the rooftop open space area and not other amenities and facilities to be located within the development, which will be discussed further. Nevertheless, the proposal results in a shortfall of 65sqm, with this shortfall to be mitigated through a s106 financial contribution. This will be detailed within the Heads of Terms at the beginning of this report.

In terms of the rooftop space proposed, this is high quality and would provide an excellent standard of amenity for students. Being at an elevated position on the 20th floor, the space will benefit from 180-degree long range views and the space will be filled with moveable and immovable furniture to encourage both relaxation and socialising. This includes a long table for collaboration with other students and moveable individual seating to form meetings with different group sizes. Surrounding the space will be enclosed by lush planting suitable to a rooftop location, typically bedded within raised planters.

An image of the overall plan for the rooftop amenity area is shown within the image below:



Figure 26: Proposed Rooftop Outdoor Space for PBSA (Block AB)

In both cases, the applicant will need to provide full details of the landscaping proposed, which has been recommended by condition, which will be assessed in conjunction with Council’s Landscape Architects.

Internal Amenity for Student Accommodation

Throughout the scheme a number of facilities are proposed for communal/shared use, which is separate from the requirements under Policy 7D to deliver amenity space within new development. Whilst the “cluster” rooms would each have their own shared lounge and kitchen spaces, communal space that is conducive to the health and wellbeing of students and their ability to excel is necessary. Both the first and second floors of the building will accommodate shared amenity, fulfilling a variety of functions as summarised in the table below:

First Floor	Second Floor
<ul style="list-style-type: none"> ▪ Games Room ▪ Shared Kitchen and Lounge ▪ Study Space with separate meeting rooms ▪ Gymnasium 	<ul style="list-style-type: none"> ▪ Shared Kitchen and Lounge ▪ Study Space ▪ Coin-operated Laundrette ▪ Cinema Room

Notwithstanding the shared amenity spaces within each of the “clusters” and the rooftop amenity area, the additional internal amenity areas would provide for an additional 647sqm of space for students to use. The proposed uses within the shared spaces shown in the table above would foster a sense of community within the building by encouraging social interaction, whilst also providing spaces for students to use for recreational or study purposes. The spaces proposed are considered to be successful in their design.

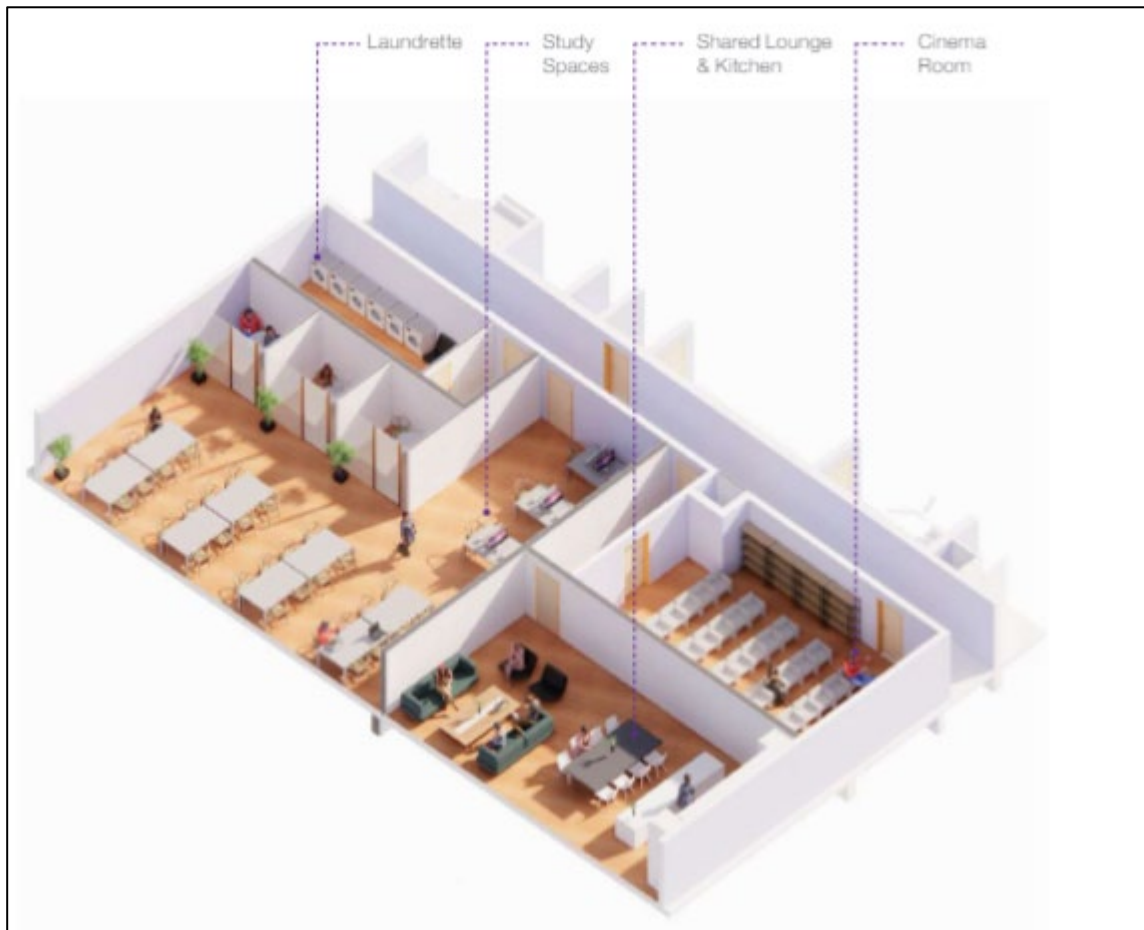


Figure 37: Shared Student Amenity Space at Level 02

Transport & Highways

As with the consented scheme, loading arrangements would be accommodated within the carriageway on Stirling Road for both buildings. The loading bay continues to be acceptable in principle, however this will be subject to further detailed design with Council’s Highway’s Officers through the s278 agreement.

A significant improvement between the consented and proposed schemes is that now, all industrial spaces within Blocks AB would be directly accessible to the proposed loading bay. Appropriate servicing arrangements for the industrial space are essential to ensure that continued viability of the proposed commercial spaces as industrial uses. The images below show the loading arrangements for both proposed buildings.

Each of the loading bays would have a length of 13 metres, having the capability of accommodating a single 10m long HGV vehicle or two smaller vans at once.

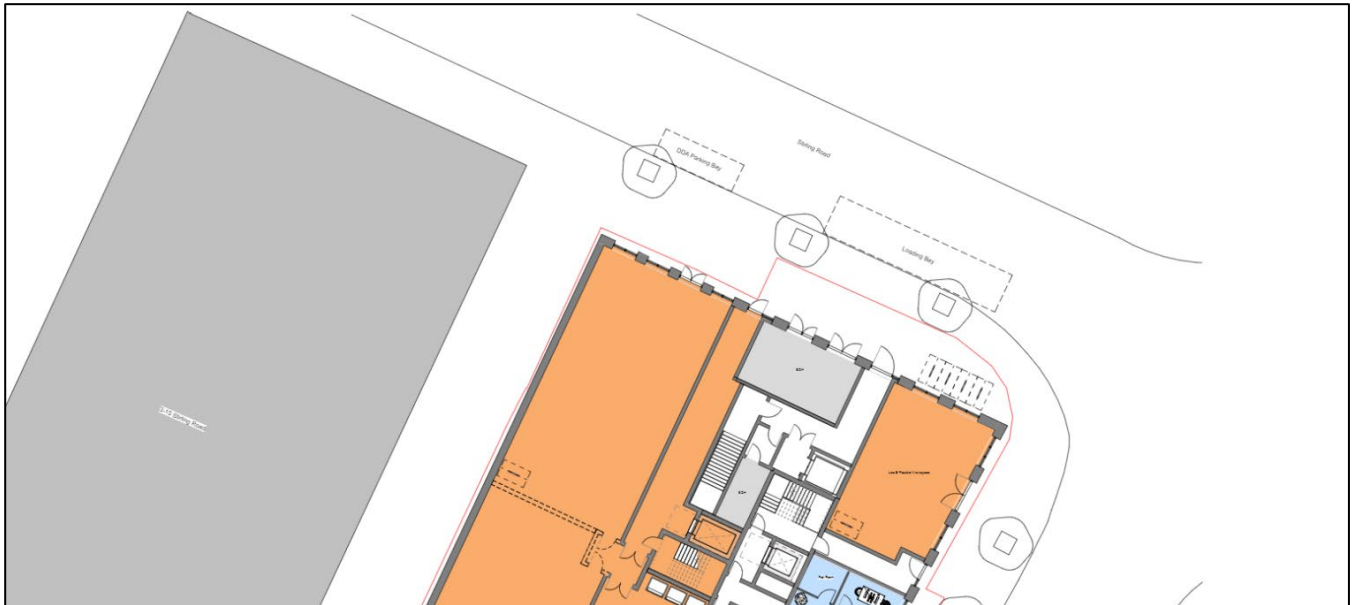


Figure 38: Loading Bay Block AB

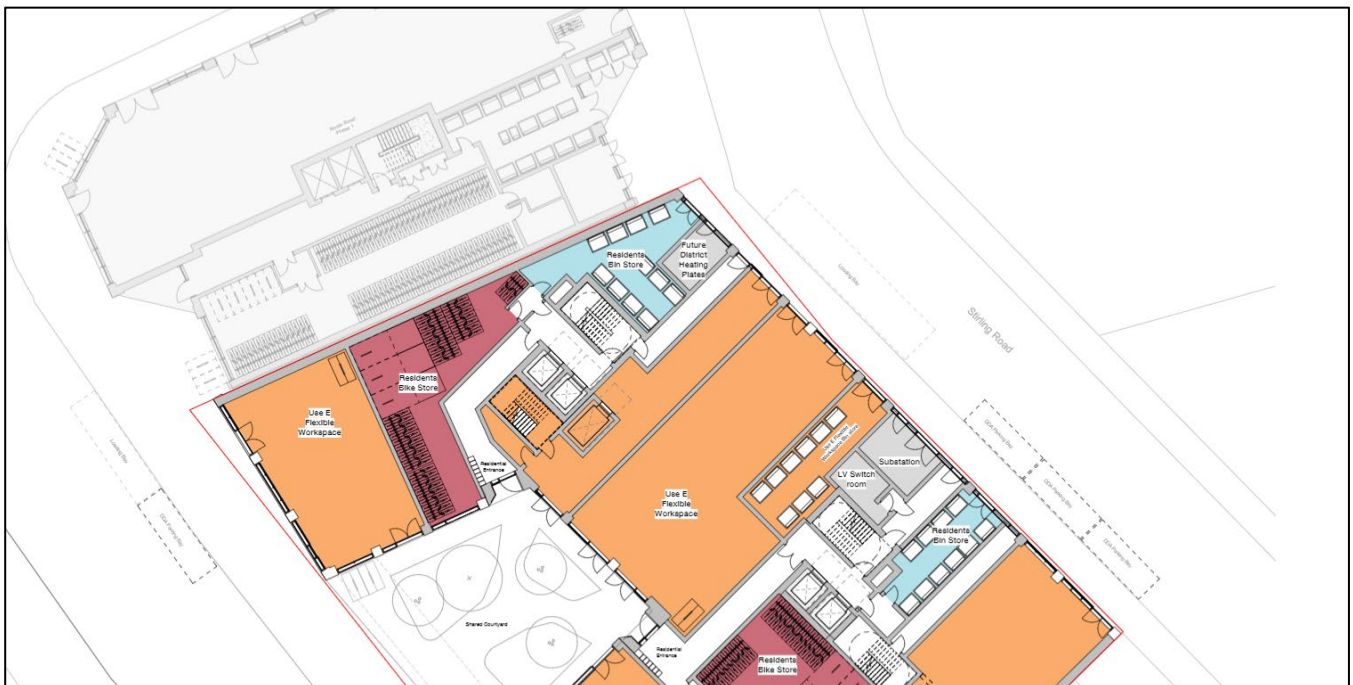


Figure 39: Loading Bay Block JK

As with the consented scheme, the loading arrangements are considered to be acceptable in principle, subject to further design development in consultation with Council's Highways Team through a s278 agreement.

There is the potential conflict with the needs of industrial users within the surrounding area and the implementation of student accommodation. This is as student accommodation typically has arrangements whereby there are a number of times of the year when students in large groups would be moving-in and out of the development at a similar time. This is not a typical situation with conventional housing developments.

The applicant has provided some basic details on how this would be managed. However, it must be noted that further details would be required, which has been recommended to be submitted via condition. The following key points are made:

- Existing good quality public transport options would be actively promoted by the management of the development for departures and arrivals.
- The existing CPZ in the area would limit the opportunities to arrive by private vehicle and there are several pay-and-display bays on Stirling Road that could be used for those that choose to arrive in this way.
- Students will arrive within a 2-week period in September which will naturally spread arrivals over a longer period.
- A set appointment time would be given for arrival and departure from the building preventing ad-hoc arrivals and departures of students. This will need to be pre-booked by an online portal.
- The length of each appointment for check-in would be 20mins. If family or friends wish to stay longer, they will be directed to park in long-stay parking on Salsbury Street, a 16min walk from the site.
- Students would be encouraged to book weekend appointments to avoid significant conflicts with industrial uses that typically operate Monday to Friday.
- There will be an increased management presence on the site during the move-in and move-out process.
- Move-out processes are typically less intensive as naturally students end their term at different times due to exam timetables.
- Should problems occur, an inverse process of move-out booking slots will be implemented by the management team.
- The management team have ensured that regular monitoring of the move-in and move-out process will be undertaken annually to identify and rectify any issues.

Based on the above framework, it is considered that this process could work successfully to not cause significant congestion or compromise the functionality of the industrial uses within the LSIS. This is accordingly acceptable in principle; however, further information has been requested by condition.

The development of both buildings would be 'car free', which is supported by the Policy T6 of the London Plan which states that "car-free development should be the starting point for all development proposals in places that are well-connected by public transport". The proximity of the site to Acton Town Underground Station (Piccadilly and District Lines) and South Acton Overground Station (with future West London Orbital Access) would ensure that all future occupiers would have good access to significant public transport nodes. The site is also well-connected to existing bus services on Bollo Lane. The applicant's Transport Statement shows that the site would result in a significant increase in bus users in comparison to the existing situation, and accordingly TfL have requested a financial contribution to bus service improvements, which is listed within the Heads of Terms above.

Whilst the development would be ‘car-free’, the proposal would be required to provide disabled/blue badge parking, which is proposed to be on-street. Accordingly, the developer would be required to meet the costs of this, which will be secured through the subsequent s278 agreement with Council’s Highways Department.

Three (3) blue badge parking spaces would be proposed on-street for Block AB (the “student accommodation”). The previous proposal for Block AB proposed 6 spaces, therefore this proposal results in a reduction of 3. It should be noted that London Plan policy T6.1 only outlines disabled parking spaces for residential dwellings (Class C3) and does not specify a specific rate for student accommodation. However, given the typical age demographic of students, a reasonable assumption could be made that demand would be less than for private market or affordable housing. In this instance and the absence of a particular policy requirement, 3 spaces for Blocks AB would be adequate to meet the likely demand for such spaces. As the car parking is proposed within the carriageway, it is also considered that there would be scope to increase the amount of on-street disabled car parking should the need arise. Therefore, 3 spaces from the outset is considered to be acceptable.

For Block JK, the proposal for C3 residential dwellings is required under Policy T6.1 to supply disabled parking at a rate of 3% of the number of units from the outset, with it being able to be demonstrated how an additional 7% could be delivered should demand arise. A proposal for 95 homes would therefore generate an initial requirement of 3 spaces. The proposal would provide for 4 on-street spaces, with the applicant advising that “3 x blue badge bays will be for the 95 residential units and 1 would be for the commercial use”. Whilst this is acceptable in principle, it must be noted that as these spaces, for both blocks, would be within the carriageway and accordingly would be accessible to the general public for blue badge holders. The additional 7% requirement for the policy could be met by converting existing pay-and-display spaces into disabled spaces, should demand arise. Overall, the scheme would deliver a collective total of 7 disabled parking spaces which is acceptable, and the carriageway has adequate capacity to increase this should demand arise.

Policy T5 of the London Plan outlines minimum standards for cycle parking, to encourage a modal shift to more sustainable forms of transportation. The applicant’s Transport Statement outlines a modal share for cycle trips for the commercial element to be 6% for the commercial elements (28 daily trips), 6% for the student accommodation (46 daily trips) and 6% for the residential units (34 daily trips). In order to increase the use of bicycles as a mode of transportation, it is essential that secure and convenient cycle parking spaces are provided.

Policy T5 sets different standards for residential and student accommodation uses for long-term cycle parking. This is summarised within the table below.

Use	Rate	Requirement	Proposed	Complies
Residential Dwellings (Block JK)	1.5 spaces per 1 bedroom & 2 spaces for all others	177 spaces	178 spaces	Yes
Student Accommodation (Block AB)	0.75 spaces per bedroom	321 spaces	322 spaces	Yes

It should be noted that the policy also requires cycle parking to be provided, with each of the buildings providing compliant amount of cycle parking provision within their respective red-line boundaries. Cycle parking spaces are also provided within the respective industrial areas of the development, which exceeds the minimum requirement set by the London Plan. A condition has been recommended requiring that all cycle parking is to meet the London Cycle Design Standards.

The Stage I response from the GLA incorporates the comments from TfL, who have noted that Stirling Road and Colville Road are industrial in nature and this, as such, raises concerns for pedestrian safety and the quality of active travel infrastructure. TfL welcomed the submitted Active Travel Zone (ATZ) assessment submitted by the applicant, however noted that there was limited information on how the development would deliver local improvements and failed to take into consideration the possibility that a greater level of trips may be made during darker hours in comparison to other developments.

Whilst this is noted, the current work that is being undertaken by Council with respect to developing a Masterplan for the South Acton Industrial Estate must be acknowledged. The GLA have also been consulted during the master planning process. This Masterplan will highlight a number of local interventions that will occur to take account of the future residents that will occupy the area, including improved footpaths, lighting and urban greening that will make the area safer and more pleasant for those coming and going from the area, including during nighttime hours. Council recognises that providing such interventions will have a material impact on improving the safety of the area for all new residents and will also encourage new residents to choose more sustainable forms of transportation to and from the site. The applicant has agreed to a financial contribution towards transport and public realm improvements, outlined within the Heads of Terms, which can be used in the future towards local improvements to improve safety and active travel.

It should be also noted that some localised interventions in the public realm are also proposed, which include the widening of the footpath, increasing the circulation space for pedestrians in the vicinity of the student accommodation entrance to Block AB. A zebra crossing is also proposed to Colville Road, which would link to the pedestrian crossing proposed as part of the TfL scheme, to improve pedestrian connectivity around the area.

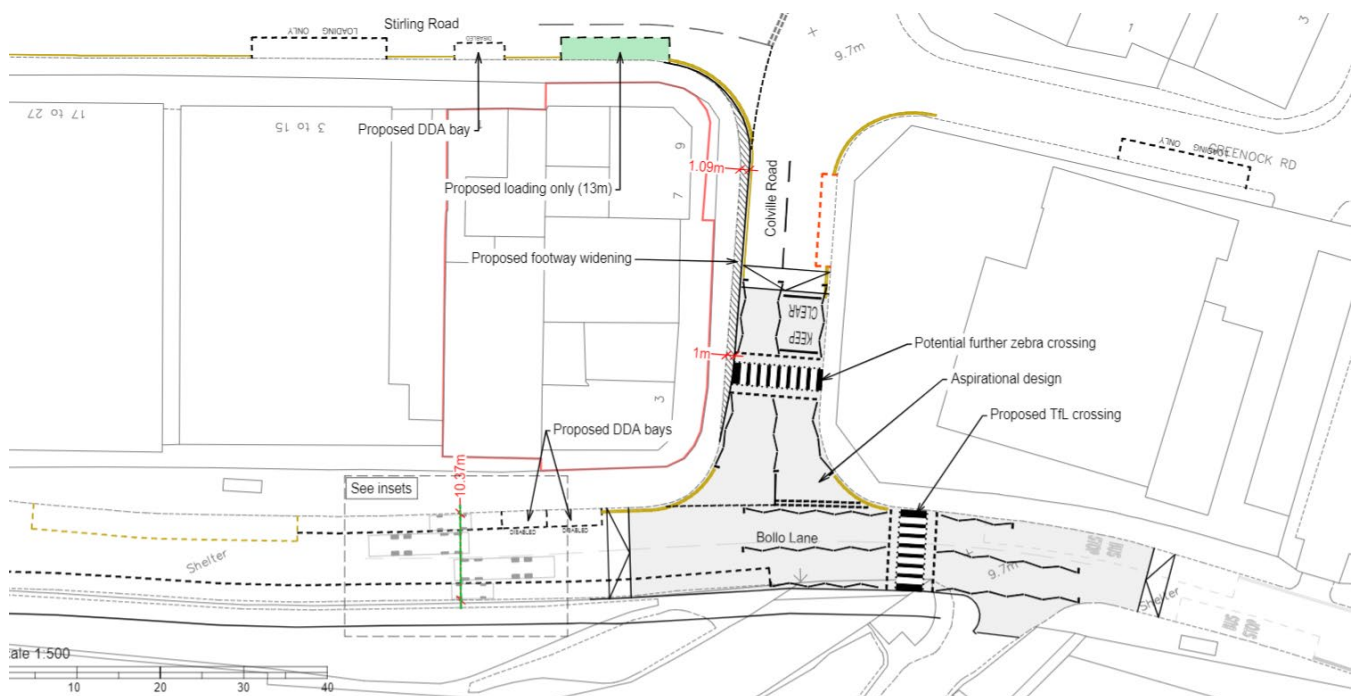


Figure 40: Proposed Highway Works Block AB

Environmental Pollution (Noise, Air Quality and Contaminated Land)

London Plan policies D14 and SI 1, Ealing Development (or Core) Strategy policies 1.1 (e) and (j); Ealing Development Management policies LV5.21 and 7A are relevant with regard to noise, air quality and contaminated land issues.

Policy D13 of the London Plan is also relevant to this application, as this application deals with the concept of “Agent of Change”. This policy states that “the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development” and that “Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them”.

As this application involves introducing more noise-sensitive uses into this Locally Significant Industrial Site (LSIS), it is of great importance that the residential and student accommodation uses are designed in a way that they both provide good quality living conditions for future residents, as well as not compromising the continued functionality of existing industrial uses or their potential intensification. This does not solely relate to noise, but also vibration, air quality, odour and dust.

The introduction of noise-sensitive uses, such as those proposed as part of this application, therefore needs to ensure that appropriate mitigation measures are implemented. Council’s Pollution-Technical Officer has reviewed the Noise Assessment that has been carried out, with some initial reservations made about the times in which this noise assessment occurred. The Officer advised that in the absence of the applicant repeating the noise assessment, the worst hourly noise levels from existing data will be used for determining the performance of the building envelope sound insulation proposed (recommended by condition). This has been agreed to by the applicant.

Based off the applicant’s agreement to this provision, it is considered that noise and vibration can be effectively mitigated and is acceptable on this basis.

Council’s Air Quality Officer has requested additional information from the applicant in the form of conditions to address potential air quality issues both during construction and on-going past the commencement of the use.

Council’s Contaminated Land Officer has also requested conditions requiring further site investigation to be carried out. This will be necessary as the majority of the site is still covered by existing buildings. Further site investigation will be able to give a fuller picture of the potential for contaminated land to exist, particularly given the industrial heritage of the site. The applicant will also be required to detail what remediation may be required and provide a verification report, showing that any contaminated land has been appropriately dealt with.

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. Ealing Council declared a climate emergency on April 2019 and adopted the Climate and Ecological Emergency Strategy in January 2021, which states that “the council will also use its planning powers to shape the quality of the development of new buildings and infrastructure in a way which minimises its impact on climate change and increases its resilience to it”.

Policy SI 2 of the London Plan, which relates to minimising greenhouse gas emissions, states that major development proposals should include a detailed Energy Strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy, which is be lean, be clean, be green and be seen. Council's Energy Consultant has reviewed the proposed strategy and is broadly supportive. The hierarchy has been followed with measures identified within the categories of lean, clean and green.

At the current design stage, the overall site-wide CO₂ emissions will be cut by approximately 55.71%, with 52.86% carbon reduction through "Lean" efficiency measures (including the ASHPs), and 2.86% through "Green" PV panels. To note; the ASHPs should have been included in the "Green" figure, but this does not affect the evaluation of the energy strategy. A GLA Carbon Reporting spreadsheet has yet to be submitted.

There is a shortfall of 1,838.4 tonnes CO₂ (over 30 years) in the zero-carbon that will be mitigated through an "offset" S106 payment at £95 per tonne to the Council of £174,635. If any later stage energy strategy hierarchy figures change then the Carbon Offset will need be amended prior to completion of the Legal Agreement.

A S106 payment will be sought for the implementation of the energy monitoring policy. Ealing Council will require the monitoring of the PV arrays and communal Air Source Heat Pump loop to evaluate their performance/efficiency for a period of 5 years.

Whole Life Carbon (WLC), Circular Economy and Water Consumption

In line with Policy SI2 of the London Plan, WLC emission assessments are required for all applications that are referable to the GLA. This outlines actions to reduce life-cycle carbon emissions and capture a development's unregulated emissions (such as those associated with cooking and small appliances), embodied emissions (those associated with raw material extraction, manufacture and transport of building materials and emissions associated with maintenance, repair and replacement and eventual material disposal. The report has been assessed by Council's Energy Consultant who has confirmed that the development is compliant with GLA Benchmarks and exceeds the aspirational target.

A Circular Economy Statement was also produced in line with Policy SI7 of the London Plan, which seeks to improve resource efficiency, encourage waste minimisation and prevention and the use of fewer resources in production and distribution of products. The proposal shows that the proposal would be compliant with the requirements of the London Plan, which include:

- diverting 95% of demolition and construction waste from landfill.
- putting 95% of excavation materials to beneficial on-site use.
- diverting 65% of Operational Waste from landfill by 2030.
- using a minimum of 20% of building materials from recycled sources.

Finally, A Water Consumption Compliance Assessment has been submitted using BRE approved software that confirms the development will meet the regulation target of 105 litres, per person, per day.

Crime Prevention

London Plan Policy 7.3 (Designing out Crime) requires any form of development to provide safe, secure and appropriately accessible environments that aim to reduce criminal behaviour. Routes of access and communal spaces should be legible and well maintained and there should be a clear distinction between private, semi-public, and public spaces, with natural surveillance of public spaces and their access.

The scheme has been reviewed by the Metropolitan Police’s Designing Out Crime Officer who has requested that the development achieve Secure by Design Accreditation.

Refuse & Recycling Storage and Waste Management

Refuse and recycling requirements for new development are assessed in accordance with Council’s Waste Management Guidelines. The requirements for refuse and recycling storage capacity are determined based on an established formula within Council’s guidelines. The capacity required for the residential dwellings proposed in Block JK is detailed within the table below.

Block JK (Residential Dwellings)	19,950L
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Block JK would provide 2 separate residential bin stores, providing collectively 21 x 1,100L bins, providing a capacity of 23,100L. This would exceed the minimum requirement and would be acceptable. The bin stores are also within close proximity to the loading bay on Stirling Road, ensuring that the residential waste collection for Block JK can be effectively managed and collected.

Council’s Waste Management Guidelines are silent on the capacity requirements for student accommodation developments, such as those proposed within Block AB. In the absence of Council guidance, the applicant has undertaken a benchmarking exercise for other such developments within London. In the 10 such developments reviewed across London, an average of 68L per bedroom per week has been calculated. A proposal for 429 rooms would therefore, based on this benchmark, produce a total requirement of 29,172L. The proposal would provide for 29 x 1,100L bins for refuse and recycling providing a total capacity of 31,900L. This would exceed the minimum requirement. An additional 2 x 280L bins would also be provided for food waste.

Somewhat unconventionally, the waste storage area for Block AB would be contained within the basement, presenting a logistical and management issue for the collection of refuse storage bins. However, on-site management would have the responsibility of ensuring that the collection of waste will be managed in an appropriate way. A lift from the basement to the ground floor level has been designed to accommodate cyclists as well as 1 x 1,100L bin. As such, individual bins would be brought up to street level. The route from basement level to the loading area on Stirling Road is shown in the image below.



Figure 41: Waste Storage Collection for Block AB

There is space within the red-line boundary that allows for the holding of approximately 15 of the 29 bins. As such, once the first 5 bins have been emptied these would be returned to the basement and additional 5 bins brought to ground level. This would be administered by the on-site management of the student accommodation. This process would repeat until all bins have been emptied.

There is the potential that during collection hours, the overuse of the lift for the transportation of bins would compromise the ability for cyclists to appropriately access the cycle store. TRICS details show however that there is the expectation of 1 cyclist between 7am and 8am and 3 cyclists between 8am and 9am. This low level of cyclist movements would be managed by the on-site management team giving precedence for cyclists to use the lift where necessary.

During the week, the on-site management team would also be responsible for the functioning of the refuse store. This would mean that Management would move bins within the space to allow for full bins to be moved to provide access to empty bins. Overall, the design and operational arrangement for the refuse storage for Block AB is acceptable and will be subject to further information that has been requested as part of the Student Management Plan condition and Site Waste Management Plan.

Mayor’s 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 exact amount of liability would be calculated by the CIL Officer who can be contacted at cilcollections@ealing.gov.uk.

Conclusion

The principle of the proposed development is wholly accepted, as it would result in a small uplift in the amount of commercial/industrial space within the scheme and deliver affordable housing uplift for the residents of Ealing in a highly desirable, well-connected location. The overall demand for student

accommodation in this location has been successfully demonstrated and will provide additional supply of PBSA rooms within the Borough in a location that is convenient for students. The uplift in PBSA rooms would also ease pressure on existing housing stock across the Borough.

Affordable Housing would be delivered on a collective basis of 38% by habitable room, which makes the proposed development eligible for the fast-track route. The scheme would deliver 95 new affordable homes, with a tenure split of 55/45 in favour of London Affordable Rent over Shared Ownership. A range of housing typologies are proposed to cater for a wide spectrum of potential occupants.

Both the proposed residential dwellings and student accommodation would provide for good quality living conditions for future residents. The residential dwellings would provide for compliant internal living spaces and private amenity areas, whilst having access to good quality communal amenity areas and children's play spaces. The student accommodation would provide a compact form of living that would provide the necessary furnishings. Accommodation would be arranged in the form of "studios" providing self-contained accommodation and "clusters" providing more basic living spaces that have access to communal living and kitchen areas.

All student residents of the PBSA block (Block AB) would also have access to outdoor spaces in the form of a roof terrace, as well as good quality internal shared spaces that will encourage socialising, recreation and collaboration.

Transport and Highways considerations as well as refuse storage and management have been considered in full and the delivery and servicing arrangements are broadly consistent with the previously consented scheme and would deliver individual loading bays for each building within the carriageway on Stirling Road, along with disabled parking spaces. Compliant levels of cycle parking have been provided to encourage a modal shift to more sustainable forms of transportation. A 278 agreement will be required for all works relating to the highway.

Overall, the development is considered to be high quality that would provide a significant improvement to the character and appearance of the area and deliver space for existing, new, and emerging businesses and industries. The site is suitable to accommodate a tall building by virtue of both the existing consent on the site and the full Townscape and Visual Impact Assessment that has been carried out in accordance with Policy D9(C) of the London Plan. Impacts on heritage assets are less than substantial, with the public benefits of the proposed development outweighing any harm caused.

The application is accordingly recommended for approval, subject to conditions, s106 legal agreement and Stage II referral to the GLA.

Human Rights Act:

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

Public Sector Equality Duty

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

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

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

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

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

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

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

Fire Safety

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

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

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

Any person or organisation carrying out development can appoint either the Council's Building Control Service or a Private Approved Inspector to act as the Building Control Body (BCB), to ensure that the

requirements of the Building Regulations are met. The BCB would carry an examination of drawings for the proposed works, and carry out site inspection during the work to ensure that the works are carried out correctly. On completion of work the BCB will issue a Completion Certificate to confirm that the works comply with the requirements of the Building Regulations. In relation to fire safety in high rise residential developments, some of the key measures include protected escape stairways, smoke detection within flats, emergency lighting to commons areas, cavity barriers/fire stopping and the use of sprinklers and wet/dry risers where appropriate.

ANNEXE 1

Conditions/Reasons:

COMPLIANCE

1. Statutory Timeframes

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

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

2. Approved Plans and Documents

The development hereby approved shall be carried out in accordance with drawing title numbers:

BOL-HBA-SW-RF-DR-A-010100 (Existing Site Location Plan); BOL-HBA-AB-RF-DR-A-010101 (Existing Block Plan 1-9 Colville Road); BOL-HBA-AB-RF-DR-A-010102 (Existing Roof Plan 1-9 Colville Road); BOL-HBA-JK-RF-DR-A-010103 (Existing Block Plan 67-91 Stirling Road); BOL-HBA-JK-RF-DR-A-010104 (Existing Roof Plan 67-91 Colville Road); BOL-HBA-AB-XX-DR-A-010200 (Existing Elevations 1-9 Colville Road); BOL-HBA-JK-XX-DR-A-010201 (Existing Elevations 67-91 Stirling Road); BOL-HBA-SW-XX-DR-A-010300 (Existing Site Section Bollo Lane Urban Block);

BOL-HBA-SW-RF-DR-A-080050 (Proposed Site Location Plan)

Block AB

BOL-HBA-AB-XX-SH-A-080001 (Accommodation Schedule); BOL-HBA-AB-RF-DR-A-080051 (Proposed Block Plan); BOL-HBA-AB-B1-DR-A-080099 (Basement Level); BOL-HBA-AB-00-DR-A-080100 (Level 00); BOL-HBA-AB-01-DR-A-080101 (Level 01); BOL-HBA-AB-02-DR-A-080102 P02 (Level 02); BOL-HBA-AB-ZZ-DR-A-080103 (Levels 03-06); BOL-HBA-AB-ZZ-DR-A-080107 (Levels 07-09); BOL-HBA-AB-ZZ-DR-A-080110 (Levels 10-17); BOL-HBA-AB-ZZ-DR-A-080118 (Levels 18-19); BOL-HBA-AB-RF-DR-A-080120 (Roof Level); BOL-HBA-AB-XX-DR-A-080200 (North Elevation); BOL-HBA-AB-XX-DR-A-080201 (East Elevation); BOL-HBA-AB-XX-DR-A-080202 (South Elevation); BOL-HBA-AB-XX-DR-A-080203 (West Elevation); BOL-HBA-AB-XX-DR-A-080300 (Section AA); BOL-HBA-AB-XX-DR-A-080450 (Typical Bay Studies) (all plans Rev 01 unless otherwise specified);

Block JK

BOL-HBA-JK-XX-SH-A-080001 (Block JK GIA Areas and Apartment Schedules); BOL-HBA-JK-RF-DR-A-080052 (Proposed Block Plan); BOL-HBA-JK-00-DR-A-080100 rev P02 (Proposed Ground Floor Plan); BOL-HBA-JK-01-DR-A-080101 (Proposed Level 01 Floor Plan); BOL-HBA-

JK-02-DR-A-080102 (Proposed Level 02 Floor Plan); BOL-HBA-JK-ZZ-DR-A-080103 (Level 03 – 05 Floor Plan); BOL-HBA-JK-06-DR-A-080106 (Level 06 Floor Plan); BOL-HBA-JK-07-DR-A-080107 (Level 07 Floor Plan); BOL-HBA-JK-ZZ-DR-A-080108 (Level 08-10 Floor Plan); BOL-HBA-JK-RF-DR-A-080111 (Proposed Roof Plan); BOL-HBA-JK-XX-DR-A-080200 (Proposed South West Elevation); BOL-HBA-JK-XX-DR-A-080201 (Proposed North East Elevation); BOL-HBA-JK-XX-DR-A-080202 (Proposed South East Elevation); BOL-HBA-JK-XX-DR-A-080203 (Proposed North West Courtyard Elevation); BOL-HBA-JK-XX-DR-A-080301 (Proposed Section AA); BOL-HBA-JK-XX-DR-A-080450 (Bay Study A); BOL-HBA-JK-XX-DR-A-080451 (Bay Study B) (all plans Rev 01 unless otherwise specified)

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

3. Restriction of Commercial/Industrial Uses

Notwithstanding the provisions of the Town & Country Planning (General Permitted Development) Order, 1995 as amended, or any future amendments, the industrial workspace at ground floor within both buildings hereby permitted shall be used only for purposes within Use Class E(g)(ii)(iii)/B2/B8 of the Town & Country Planning (Use Classes) Order 1987 as amended, and for no other purpose, without the prior written permission of the local planning authority. The industrial workspace must be completed in full prior to the occupation of the proposed residential flats. For the first floor of the commercial space, more flexible Class E(g)/B2 and B8 uses only are permissible, as is ancillary space associated with industrial uses at ground floor level.

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

4. Secure by Design

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

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

5. Student Capacity Restriction

The total number of residents within the student accommodation part of the development hereby approved shall not exceed 1 person per room at any one time within the accommodation as a whole.

Reason: In order to prevent the over-occupancy of the premises, to ensure that amenity spaces within the development are appropriate capacity and ensure that each of the rooms proposed remain as single occupancy, in the interests of the amenities of the surrounding area and the living conditions of residents, in accordance with Policy D6 and H15 of the London Plan and Policy 7B of the Ealing Development Management DPD.

6. Accessible Housing

10% of the approved residential dwellings and student accommodation rooms 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.

7. Refuse Storage

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

Reason: In the interests of the adequate disposal, storage and collection of waste and recycling, to protect the living conditions of occupiers of the area and in the interests of highway and pedestrian safety all in accordance with policies policies 1.1 (e) and 6.1 of the Ealing Core Strategy (2012), policy 7A of the Ealing Development Management Development Plan Document (2013), policy SI8 of the London Plan (2021) and the National Planning Policy Framework (2021).

8. Contaminated Land - Unsuspected Contamination

The developer shall draw to the attention of the Local Planning Authority the presence of any unsuspected contamination encountered during the development.

In the event of contamination to land and/or water being encountered, no development shall continue until a programme of investigation and/or remedial work to include methods of monitoring and certification of such work undertaken has been submitted and approved in writing by the Local Planning Authority.

None of the development shall be occupied until the approved remedial works, monitoring and certification of the works have been carried out and a full validation report has been submitted to and approved in writing by the Local Planning Authority.

In the event that no contamination is encountered, the developer shall provide a written statement / photographic evidence to the Local Planning Authority confirming that this was the case, and only after written approval by the Local Planning Authority shall the development be occupied. The evidence shall include waste disposal transfer notes proving correct disposal of soil.

Reason: To ensure that any ground and water contamination is identified and adequately addressed to ensure the safety of the development, the environment and to ensure the site is suitable for the proposed use.

9. Environmental Health – Plant and Machinery

The individual and combined external sound level emitted from plant, machinery or equipment at the development site shall be lower than the lowest existing background sound level by at least 10dBA, as measured at/ calculated to the nearest and most affected noise sensitive premises at the development site and at surrounding premises. The assessment shall be made in accordance with BS4142:2014 +A1 2019, with all machinery operating together at maximum capacity.

Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment, in accordance with Policy 7A of the Ealing Development Management DPD and Policy D6 and D14 of the London Plan.

10. Environmental Health – Anti-Vibration Mounts

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

Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by vibration noise from mechanical installations/ equipment, in accordance with Policy 7A of the Ealing Development Management DPD and Policy D6 and D14 of the London Plan.

11. 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).

12. Opening of Doors

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

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

13. Cycle Parking

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

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

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

14. Passenger Lifts

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

Reason: To ensure that adequate access is provided to all floors of the development for all occupiers and visitors including those with disabilities, in accordance with policy 1.1(h) of the Ealing Core Strategy (2012), Policy D7 of the London Plan (2021) and the National Planning Policy Framework (2021).

15. No masts/satellite dishes or external equipment

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

Reason: To safeguard the appearance of the buildings and the locality in the interests of visual amenity policies 1.1 (h) (g), 1.2(h), 2.1(c) and 2.10 of the Ealing Core Strategy (2012), policies ELV 7.4, 7B and 7C of the Ealing Development Management Development Plan Document (2013), policies D1 and D4 of the London Plan (2021).

PRIOR TO COMMENCEMENT

16. Demolition Method Statement and Construction Management Plan

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

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

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

17. Construction Logistics Plan

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

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

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

19. London Underground – Detailed Design and Method Statement

The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) have been submitted to and approved in writing by the local planning authority which:

- provide Risk Assessment and Method Statement for Demolition, Piling, superstructure, Tower cranes/Mobile cranes, Scaffolding, etc
- provide Lifting plans for all tall plants
- accommodate the location of the existing London Underground structures- Logistic plans for material and deliveries to site during construction (impact on access to LU Frank Pick House)
- information and drawings on substructure (GA)
- accommodate ground movement arising from the construction thereof - Ground Movement Assessment for demolition and loading, to assess impact on adjacent buildings
- mitigate the effects of noise and vibration arising from the adjoining operations within the structures - Environmental plans; Dust, noise & vibration mitigations

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

20. Thames Water – Piling Method Statement

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

21. Air Quality and Dust Management Plan (AQDMP)

Prior to commencement of any works onsite, an Air Quality and Dust Management Plan (AQDMP) shall be submitted for the approval of the Local Planning Authority. The AQDMP will be based on the findings of Air Quality (Dust) Risk Assessment provided in the Air Quality Assessment report titled "Bollo Place 1-9 Colville Road & 67-81 Stirling Road" dated June 2023. The AQDMP will provide a scheme for air pollution mitigation measures based on the findings of the Air quality report.

The plan shall include:

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

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

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

22. Whole-Life-Cycle Carbon Assessment

- a) Prior to the Commencement of Construction (excluding demolition, site clearance, site investigation and site remediation) a Whole Life Carbon Assessment shall be submitted to the Council for approval. The Assessment shall be compliant with policy SI2(F) of the London Plan

and in line with the GLA (March 2022) guidance. The Development shall meet the GLA benchmark targets and seek to achieve the aspirational target.

- b) Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the building(s) being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development should submit the post-construction Whole Life-Cycle Carbon (WLC) Assessment to the GLA at: ZeroCarbonPlanning@london.gov.uk. The owner should use the post construction tab of the GLA's WLC assessment template and this should be completed accurately and in its entirety, in line with the criteria set out in the GLA's WLC Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.
- c) The Development shall implement the measures identified in the WLC Assessment prepared by Greengage in June 2023 (v1). Modules A1-A5 should aim to achieve 601 KgCO₂e/m², and B1-C4 (excluding B6/B7) 552 KgCO₂e/m², with a total carbon emissions baseline scenario (over 60 years) of 870 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.

23. Details of Materials

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

Reason: To ensure that the materials and finishes are of high quality and contribute positively to the visual amenity of the locality in accordance with policies 1.1 (h) (g), 1.2(h), 2.1(c) and 2.10 of the Ealing Core Strategy (2012), policies ELV 7.4 and 7B of the Ealing Development Management Development Plan Document (2013), policies D1 and D4 of the London Plan (2021) and the National Planning Policy Framework (2018).

24. Student Management and Drop-Off/Pick-Up Strategy

Prior to the completion of the superstructure, Student Management and Drop-Off/Pick-Up Strategy shall be submitted and approved by the Local Planning Authority. The approved plan, to be implemented upon occupation of any part the student accommodation part of the development, shall operate only in accordance with the approved details, in perpetuity. The plan should outline, as a minimum, the following:

- Robust demonstration on that the delivery and servicing facilities proposed are sufficient to accommodate the level of demand anticipated from all proposed uses and that the student move-in/move-out process will not overspill onto local roads
- How the process will function and how this will be communicated with students and their families
- How the process will avoid significant interference with the industrial uses within the surrounding area

- Further information on the management and operation of the refuse stores within the student accommodation building, including collection arrangements

Reason: To ensure that the student accommodation element of the development will be effectively managed to minimise disruption to the highway network and the surrounding industrial uses, in accordance with Policy H15 and T7 of the London Plan.

25. Overheating and Cooling

Prior to commencement of construction (excluding demolition, site clearance, site investigation and site remediation) an Overheating and Cooling analysis report shall be submitted to the Council for approval. The dynamic analysis shall be compliant with the relevant CIBSE guidance Part O (domestic TM59/Guide A), and/or TM52 (non-domestic), and modelled against the TM49 DSY1 (average summer) weather data file, as well as the more intense DSY2 (2003) and DSY3 (1976) data files for TM59 criteria (a) and (b). The Overheating/Cooling report shall propose active and passive measures to be incorporated into the development to minimise the risk of overheating and meet DSY1 modelling.

Reason: To ensure that the risk of overheating has been sufficiently addressed in accordance with policy SI4 of the London Plan; Ealing's Development (Core) Strategy, and Development Management DPD.

26. Contaminated Land – Site Investigation, Risk Assessment and Remediation Scheme

Prior to the commencement of any works on site (except demolition and site clearance) the following shall be submitted to and subject to the approval in writing of the Local Planning Authority:

- a. An intrusive contaminated land investigation and risk assessment of the site shall be carried out in accordance with BS1075:2011+A1:2013 and LCRM (formerly CLR11) guidance to assess the nature and extent of any contamination on the site. The site investigation is to be based on a gap analysis of the coverage in the submitted report Ref. IDOM GEA-21849h - 22-457 in particular at the Bollo yard site (67-91 Stirling rd), but also the Colville Rd site. 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.
- b. A contamination remediation scheme to bring the site to a condition suitable for the intended end use. It shall include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. 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.

Reason: To protect the health and living conditions of residents in accordance with National Planning Policy Framework 2021; the London Plan 2021; Ealing Core Strategy 2012 and Ealing Development Management Development Plan 2013.

27. Environmental Health – Revised Noise Assessment

Prior to commencement of the development (excluding demolition, site clearance and ground works), a noise assessment shall be submitted to the Council for approval in writing, of external noise levels from transport and industrial/ commercial/ cultural sources, during work and school weeks, having regard to the assessment standards of the Council's SPG10. Details shall include the sound insulation of the building envelope including glazing specifications (laboratory

tested including frames, seals and any integral ventilators, approved in accordance with BS EN ISO 10140-2:2010) and of acoustically attenuated mechanical ventilation and cooling as necessary (with air intake from the cleanest aspect of the building and details of self-noise) to achieve internal noise limits specified in SPG10. Best practicable mitigation measures shall also be implemented, as necessary, in external amenity spaces to achieve criteria of BS8233:2014.

The approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: In the interests of the living conditions of the future occupiers of the site in accordance with policy 7A of the Ealing Development Management DPD and Policy D6 and D14 of the London Plan.

28. Environmental Health – Enhanced Sound Insulation

Prior to commencement of the development (excluding demolition, site clearance and ground works), details shall be submitted to the Council for approval in writing, of an enhanced sound insulation value of at least 5dB above the maximum Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/uses in adjoining dwellings/areas, ie. bedrooms below/above/adjoining kitchen/living/dining/bathroom of separate dwelling and of at least 10dB enhancement for bedrooms below/above/adjoining communal areas and facilities, such as communal amenity spaces/ entrances/ staircases and facilities (eg. bin/ cycle storage etc.) The assessment and mitigation measures shall have regard to standards of the Council's SPG10 and noise limits specified in BS8233:2014. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise, in accordance with Policy 7A of the Ealing Development Management DPD and Policy D6 and D14 of the London Plan.

29. Environmental Health – Enhanced Sound Insulation (Commercial and Residential Uses)

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

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise, in accordance with Policy 7A of the Ealing Development Management DPD and Policy D6 and D14 of the London Plan.

30. Environmental Health – Enhanced Noise Insulation (Lifts)

Prior to commencement of the development (excluding demolition, site clearance and ground works), details shall be submitted to the Council for approval in writing, of enhanced sound insulation of lifts and lift shafts, in accordance with noise limits specified in Table 5 BS8233:2014. 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 future occupiers of the site in accordance with Policy 7A of the Ealing Development Management DPD and Policy D6 and D14 of the London Plan.

31. Air Quality – Revised Air Quality Assessment

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

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

32. Air Quality – Ventilation Strategy

Prior to the commencement of the development (excluding demolition, site clearance and ground works), 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 the installation of a filtered fresh air ventilation system capable of mitigating elevated concentrations of nitrogen oxides and particulate matter in the external air for all residential dwellings and student housing units.

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 extract 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).

PRIOR TO OCCUPATION

33. Deliveries and Servicing Plan

A Delivery and Servicing Plan (DSP) for the development detailing servicing arrangements, times and frequency and operational details shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development. The DSP should clearly identify how the on-street loading bay will be managed to ensure that, as far as possible, that space is

continually available for deliveries. No deliveries or servicing shall occur within the proposed disabled bays or on Bollo Lane.

The servicing of the development shall be operated strictly in accordance with the details so approved, shall be maintained as such thereafter and no change therefrom shall take place without the prior written consent of the Local Planning Authority obtained through the submission of a planning application.

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

34. Site-Wide Waste Management Plan

Prior to the first occupation of the hereby approved development, details of the refuse and recycling storage for both buildings shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the number and capacity of bins, the location of storage and the materials for the store. The approved storage shall be brought into use prior to the first use of the hereby approved development and shall be permanently retained thereafter.

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

35. Travel Plan

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

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

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

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

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

- Details of sustainable urban drainage systems to be implemented on site.

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

37. 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 55.7% (equating to 78 tonnes of CO₂ per year) beyond Building Regulations Part L 2021 and using SAP10. These CO₂ savings shall be achieved through the Lean, Clean, Green Energy Hierarchy as detailed in the approved Energy Statement prepared by Applied Energy in July 2023 (v1) including:
 - i. Lean, energy efficiency design measures, and Air Source Heat Pumps, to achieve an annual reduction of at least 70.65% equating to at least 65 tonnes in regulated carbon dioxide (CO₂) emissions over BR Part L 2021 for the residential development, and at least 18.75%, equating to at least 9 tonnes, over Part L 2021 for the non-residential space.
 - ii. Green, renewable energy equipment including the incorporation of photovoltaic panels with a combined total capacity of at least 27.3 to achieve an annual reduction of at least 2.86%, equating to 4 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 system(s) (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 PV and Air Source Heat Pumps, 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 PV and ASHP 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 PV and ASHP equipment copies of the MCS certificates and all relevant commissioning documentation shall be submitted to the Council.
- d) Details of the energy plant room and equipment showing sufficient space to allow for connection to an offsite district heating network in the future;

- e) Within three months of the occupation/first-use of the development a two-page summary report prepared by a professionally accredited person comparing the “as built stage” TER to BER/DER figures against those in the final energy strategy along with the relevant Energy Performance Certificate(s) (EPC) and/or the Display Energy Certificate(s) (DEC's) shall be submitted to the Council for approval.

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

38. Post-Construction Renewable/Low-Carbon Energy Equipment Monitoring

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

- a) Enter into a legal agreement with the Council to secure a S106 financial contribution, or alternative financial arrangement, for the post-construction monitoring of the photovoltaic panels and Air Source Heat Pumps to be incorporated into 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 PV and ASHPs shall be installed. The monitored data shall be automatically submitted to the Council at daily intervals for a period of five years from occupation and full operation of the energy equipment. The installation of the monitoring devices and the submission and format of the data shall be carried out in accordance with the Council's approved specifications as indicated in the Automated Energy Monitoring Platform (AEMP) information document. The developer must contact the Council's chosen AEMP supplier (Emergence Ltd) on commencement of construction to facilitate the monitoring process.
- c) Upon final completion of the development and prior to occupation, the developer must submit to the Council proof of a contractual arrangement with a certified contractor that provides for the ongoing, commissioning, maintenance, and repair of the PV and ASHPs 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.

39. Circular Economy

- a) Prior to completion of construction of the permitted development a Circular Economy Statement Post Completion Report should be completed accurately and in its entirety in line with the GLA's

Circular Economy Statement Guidance (or equivalent alternative Guidance as may be adopted). This should be submitted to the GLA at: CircularEconomyLPG@london.gov.uk, along with any supporting evidence as per the guidance. The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation.

- b) Specific commitments detailed in the Circular Economy statement produced by Scotch Partners LLP in June 2023 (v1), or any later approved version, and accompanying Logistic Plans, should be implemented including aiming to; divert 98% of construction waste from landfill, put 95% of excavation materials to beneficial on-site use, and support 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), S17 (Reducing waste), S12 (Minimising greenhouse gas emissions).

40. Contaminated Land – Verification Report

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

Reason: To ensure the land contamination issues are addressed in accordance with National Planning Policy Framework 2021; the London Plan 2021; Ealing Core Strategy 2012 and Ealing Development Management Development Plan 2013.

41. Air Quality – Emergency Diesel Generators

Prior to their operation, details on all new installed diesel generators demonstrating compliance with a minimum NOx emissions standard of 150mg/Nm-3 (at 5% O2) must be submitted and approved in writing by the Local Planning Authority.

The details must include the results of NOx emissions testing of the diesel fuelled generator units by an accredited laboratory, emissions concentrations expressed at specific reference conditions for temperature, pressure, oxygen and moisture content under normal operating conditions.

Where any combustion plant does not meet the relevant standard, it should not be operated without the fitting of suitable NOx abatement equipment or technology. Evidence of installation shall be required where secondary abatement is required to meet the NOx Emission standard 150mg/Nm-3 (at 5% O2). The emergency plant and generators hereby permitted may be operated only for essential testing, except when required in an emergency situation.

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

ONGOING CONDITIONS

42. Post-Construction Energy Use Monitoring

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

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

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

43. Non-Residential BREEAM energy/CO₂ accreditation

- a) The non-residential element of the development shall be registered with Building Research Establishment (BRE) and achieve BREEAM Rating “Excellent” with a score of approximately 76% as predicted in the BREEAM pre-assessment documents.
- b) Within 3 months of completion of each non-residential element of the development, Interim BREEAM NC Assessment and related Certification verified by the BRE shall be submitted to the Local Planning Authority for written approval.
- c) Within 3 months from the date of first occupation of each non-residential element of the development, BREEAM 'Post Construction Stage' Assessment and related Certification verified by the BRE should be submitted to the Local Planning Authority for written approval confirming the BREEAM standard and measures have been implemented.
- d) Following any approval of a 'Post Construction Stage' assessment and certification of the development, the approved measures and technologies to achieve the BREEAM “Excellent” shall be retained in working order in perpetuity.

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), 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, policies LV5.2 and 7A of the Ealing Development Management DPD 2013, and Policies 1.1(k) and 1.2(f) of the Ealing Development (Core) Strategy 2012.

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 (2023)

London Plan (2021)

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience
- D1 London’s form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public realm
- D9 Tall buildings
- D11 Safety, security and resilience to emergency
- D12 Fire safety
- D13 Agent of Change

D14 Noise
H1 Increasing housing supply
H4 Delivering affordable housing
H5 Threshold approach to applications
H6 Affordable housing tenure
H7 Monitoring of affordable housing
H10 Housing size mix
S4 Play and informal recreation
E6 Locally Significant Industrial Sites
E7 Industrial intensification, co-location and substitution
E8 Sector growth opportunities and clusters
HC1 Heritage conservation and growth
HC5 Supporting London's culture and creative industries
G1 Green infrastructure
G4 Open space
G5 Urban greening
G6 Biodiversity and access to nature
SI 1 Improving air quality
SI 2 Minimising greenhouse gas emissions
SI 3 Energy infrastructure
SI 4 Managing heat risk
SI 7 Reducing waste and supporting the circular economy
SI 8 Waste capacity and net waste self-sufficiency
SI 12 Flood risk management
SI 13 Sustainable drainage
T1 Strategic approach to transport
T3 Transport capacity, connectivity and safeguarding
T4 Assessing and mitigating transport impacts
T5 Cycling
T6 Car parking
T6.1 Residential parking
T6.5 Non-residential disabled persons parking
T7 Deliveries, servicing and construction
T9 Funding transport infrastructure through planning
DF1 Delivery of the Plan and Planning Obligations

Supplementary Planning Guidance /Documents

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

Affordable Housing & Viability- Supplementary Planning Guidance (2017)

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

- 1.1 Spatial Vision for Ealing 2026 (a), (b), (c), (d), (e), (f), (g), (h), (j) and (k)
- 1.2 Delivery of the Vision for Ealing (a), (c), (d), (e), (f), (g), (h), (k) and (m)
- 5.5 Promoting parks, local green space and addressing deficiency (b) and (c)
- 6.1 Physical infrastructure
- 6.2 Social infrastructure
- 6.4 Planning Obligations and Legal Agreements

Ealing's Development Management Development Plan Document (2013)

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

Ealing's Draft Local Plan (2022)

- D9: Tall Buildings London Plan Ealing LPA
- HOU: Affordable Housing
- E4: Land for Industry, Logistics and Services to Support London's Economic Function
- E6: Locally Significant Industrial Sites (LSIS)
- G5: Urban Greening
- CO: Carbon Offsetting

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

2. Construction and demolition works and associated activities at the development including deliveries, collections and staff arrivals audible beyond the boundary of the site should not be carried out other than between the hours of 0800 - 1800hrs Mondays to Fridays and 0800 - 1300hrs on Saturdays and at no other times, including Sundays and Public/Bank Holidays, unless otherwise agreed with the Environmental Health Officer.

3. 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. Updates of work should be provided regularly to affected neighbours. Any complaints should be properly addressed as quickly as possible.
4. 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.
5. No waste materials should be burnt on site of the development hereby approved.
6. Best Practicable Means (BPM) should be used during construction and demolition works, including low vibration methods and silenced equipment and machinery, control and monitoring measures of noise, vibration, delivery locations, restriction of hours of work and all associated activities audible beyond the site boundary, in accordance with the Approved Codes of Practice of BS 5228-1 and -2:2009+A1:2014 Codes of practice for noise and vibration control on construction and open sites.
7. Although it is not anticipated that the use of a crane at this site will impact Heathrow's Obstacle Limitation Surfaces, Instrument Flight Procedures or radar. We would like to advise the developer that if a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane, as per the requirements set out by CAP1096.
<https://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=5705>
8. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.