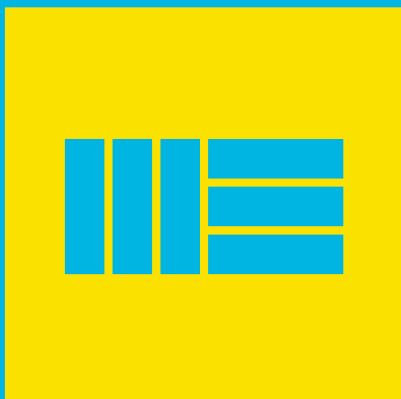


PLANNING STATEMENT

THE GREEN
SOUTHALL
LONDON
UB2

ON BEHALF OF PEABODY DEVELOPMENTS LIMITED
AND THE LONDON BOROUGH OF EALING

JULY 2021



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1.0 INTRODUCTION

1.0 This Statement has been prepared by Montagu Evans LLP on behalf of Peabody Developments Limited and the London Borough of Ealing (“the Applicant”) to support an application for planning permission at the site known as The Green, Southall, London, UB2 (“the Site”). A plan identifying the location of the Site can be found in [Figure 2.1](#).

1.1 The Site is located to the west of The Green in Southall and is defined as land comprising a public car park, business premises, roads and adjacent land lying to the north-west and to the rear of The Green and adjoining Featherstone Terrace, Dominion Road and Dilloway Yard.

1.2 The application for planning permission hereby submitted is for:

“Demolition and mixed-use redevelopment (phased) to provide 3 urban blocks comprising residential units (Use Class C3), flexible commercial, employment and community floorspace (Use Classes E, F1 & F2), private and public car parking, servicing bays, public realm and associated landscaping, play and amenity space, plant and refuse areas, and access arrangements”.

1.3 The proposed development will comprise 564 residential dwellings (Use Class C3) and 2922.8 sq.m. of flexible commercial, employment and community floorspace (Use Classes E, F1 & F2). For the purpose of assessment in this application, the flexible non-residential floorspace is broken down as follows:

- Commercial (Use Class E) – 2,502.1 sq.m.
- Nursery (Use Class F1) – 313.8 sq.m.
- Community (Use Class F2) – 106.9 sq.m.

1.4 The proposals constitute three urban blocks which will rise between two to 19 storeys (ground inclusive). A total of 60 car parking spaces will be allocated to the residential development and 90 public car parking spaces will be re-provided on the Site.

1.5 The development comprises a high-quality design, using materials which complement the surrounding townscape, and provides both private and communal amenity space and public realm improvements.

1.6 This Statement provides an analysis of the proposed scheme in light of adopted planning policy and identifies any key considerations material to the determination of the application.

1.7 This Statement should be read in conjunction with the following documents which are submitted as part of this application and set out in Schedule 1: Application Material Submitted.

1. Application Covering Letter;
2. Planning Application Form;
3. Site Location Plan;
4. Schedule of Application Drawings;
5. Application Drawings;
6. Schedule of Areas and Accommodation;

7. Planning Statement (*this document*);
8. Design and Access Statement including CGIs;
9. Landscaping Statement;
10. Statement of Community Engagement;
11. Heritage, Townscape and Visual Impact Assessment;
12. Transport Assessment;
13. Framework Travel Plan;
14. Servicing and Refuse Management Plan;
15. Daylight and Sunlight Assessment (Surrounding Development);
16. Daylight and Sunlight Assessment (Internal);
17. Air Quality Assessment;
18. Noise Impact Assessment;
19. Preliminary Ecological Appraisal;
20. Preliminary Bat Roost Assessment;
21. Framework Biodiversity Enhancement Strategy;
22. Flood Risk and Drainage Strategy;
23. Utilities Statement;
24. Energy Statement;
25. Circular Economy Statement;
26. Whole Life Carbon Assessment;
27. Overheating Statement;
28. Sustainability Statement;
29. Phase 1 Geo-environmental Assessment;
30. Wind Assessment;
31. Aviation Impact Assessment;
32. Historic Environment Assessment;
33. Draft Construction Management Plan;
34. Preliminary Arboricultural Assessment;
35. Arboricultural Impact Assessment;
36. Fire Strategy;
37. Commercial Justification Report;
38. Health Impact Assessment; and
39. Community Infrastructure Levy Form.

1.8 The application is being brought forward as a joint application between Peabody Developments Limited and the London Borough of Ealing following Peabody's selection as development partner following a competitive tendering process.

1.9 As the London Borough of Ealing comprises part of the Applicant team, the application has been made under Regulation 3 of the Town and Country Planning General Regulations 1992. For the avoidance of any doubt, references to "Ealing Council", "the Council", and "Officers" throughout this Statement refer to the planning department of the London Borough of Ealing only.

SITE OWNERSHIP

- 1.10** The Site comprises a number of third party interests. Whilst every effort is being made to obtain these ownerships through negotiations with relevant landowners, it is envisaged that use of compulsory purchase powers may ultimately be required if it is not possible to reach agreement with all landowners.
- 1.11** The Applicant's compulsory purchase advisor, Avison Young, has made efforts to identify all landowners within the Site and notices have been served to all of these landowners as part of the application. For areas within the Site where it has not been possible to identify landowners, a notice was published in the local newspaper, the Ealing Gazette, on Wednesday 14 July 2021.

PRE-APPLICATION CONSULTATION

- 1.12** The scheme has been developed in close consultation with a number of stakeholders over a period of time between July 2019 and July 2021. A summary of pre-application engagement is set out below.
- 1.13** The Applicant has undertaken eight formal pre-application meetings with local planning authority Officers which covered the full range of considerations, including:
- design and building composition;
 - ground floor commercial uses;
 - public realm and landscaping;
 - amenity and play space;
 - transport and car parking;
 - servicing and refuse collection; and
 - energy.
- 1.14** In light of the scale of the application, the Applicant has also met with Officers at the GLA for both an 'In-Principle' pre-application meeting (5 February 2019) and a subsequent 'Initial' pre-application meeting (30 September 2019). Further meetings were undertaken with Officers on 23 March 2021 and 25 June 2021 to present the scheme's evolution through design development.
- 1.15** Given the proximity of the proposed development to the Grade II* listed Southall Manor House, the proposals have been discussed with Historic England with meetings held on 31 January 2019 and 31 October 2019.
- 1.16** In respect of public engagement on the planning application, four separate public exhibition events have been undertaken which took place at the Southall Manor House. The first two were undertaken in June 2019 and the second two were undertaken in September 2019. The events took place on both a weekday and a weekend across a six hour window to help ensure maximum participation. In addition to this, individual meetings have also taken place with local resident and business groups.
- 1.17** The scheme has continued to evolve in response to feedback from key stakeholders, and the Applicant team re-engaged with officers at the London Borough of Ealing in October 2020. Further engagement with relevant stakeholders including local residents and businesses in June and July 2021 has further informed the final development proposals.

- 1.18** In this regard, in June 2021 letters were electronically issued to all key stakeholders, including key elected representatives and nearly 60 community groups, clubs, religious bodies and organisations. All the letters included a scheme newsletter, which provided key information on the proposals, revised CGIs and contact details for the development team. The scheme website, originally launched in June 2019, was also further updated in June 2021 to reflect how the scheme had evolved.
- 1.19** More detailed information about the public consultation process can be found in the [Statement of Community Engagement](#) submitted with this application.

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCREENING

- 1.20** An application for an EIA Screening Request was submitted to the Council on behalf of the Applicant in May 2021 under reference 213937SCE. It was determined on 29 June 2021 that the proposed development, as described in this Statement, does not constitute 'Environmental Impact Assessment Development' and therefore no Environmental Statement is required to be submitted with the planning application.

VISION AND SUMMARY OF BENEFITS

- 1.21** As explained further in the Statement, the scheme delivers a number of tangible planning benefits that weigh in favour of the grant of planning permission. These can be summarised as follows:
- it will regenerate and optimise a brownfield under-utilised site close to a well-established public transport network;
 - it will deliver tangible economic benefits to Southall, both through the construction phase and the end user phase;
 - it will create approximately 90 jobs across a variety of use classes. This includes creative workshop studio space, light industrial space, office space, retail and community space;
 - the ground floor commercial and residential uses will animate this level and provide active frontage and natural surveillance. Coupled with the residential development above, the mix of uses proposed will generate activity throughout all parts of the day;
 - it will deliver 564 new homes in Southall, 50% of which will be affordable. This will make a significant contribution to meeting local housing needs and assist the Council in meeting its housing targets;
 - it will deliver a range of residential unit sizes, all of which will have external private amenity space and access to shared podium gardens with designated young children's play space;
 - the layout of the scheme will enhance permeability and pedestrian links through this part of Southall which will improve walking journey times to the Southall Train Station;
 - the public realm will use high quality materials with opportunities for sitting and dwell-time to assist in local place-making;

- the design of the buildings showcase strong architectural design with tall buildings that are grounded and provide a positive interaction with the street;
- the proposals promote greener modes of travel and deter car dependency, through enhanced permeability, pedestrian links and opportunities for cycle parking; and
- the proposals will deliver tangible environmental gains including new tree planting, ecological enhancements including significant bio-diversity net gain, reduced surface water run-off, and carbon reduction measures. The new buildings, both residential and commercial, will be built to modern environmental standards, including EPC ratings.

2.0 SITE AND SURROUNDINGS

THE APPLICATION SITE

- 2.0** The Site covers an area of approximately 1.97 hectares (19,700 sq.m.) and consists of a public car park, a range of uses (described below), roads and adjacent land lying to the north-west and to the rear of The Green and adjoining Featherstone Terrace, Dominion Road and Dilloway Yard.
- 2.1** It is located in the Southall Green Ward of the London Borough of Ealing. The location of the Site can be seen in [Figure 2.1](#) below.

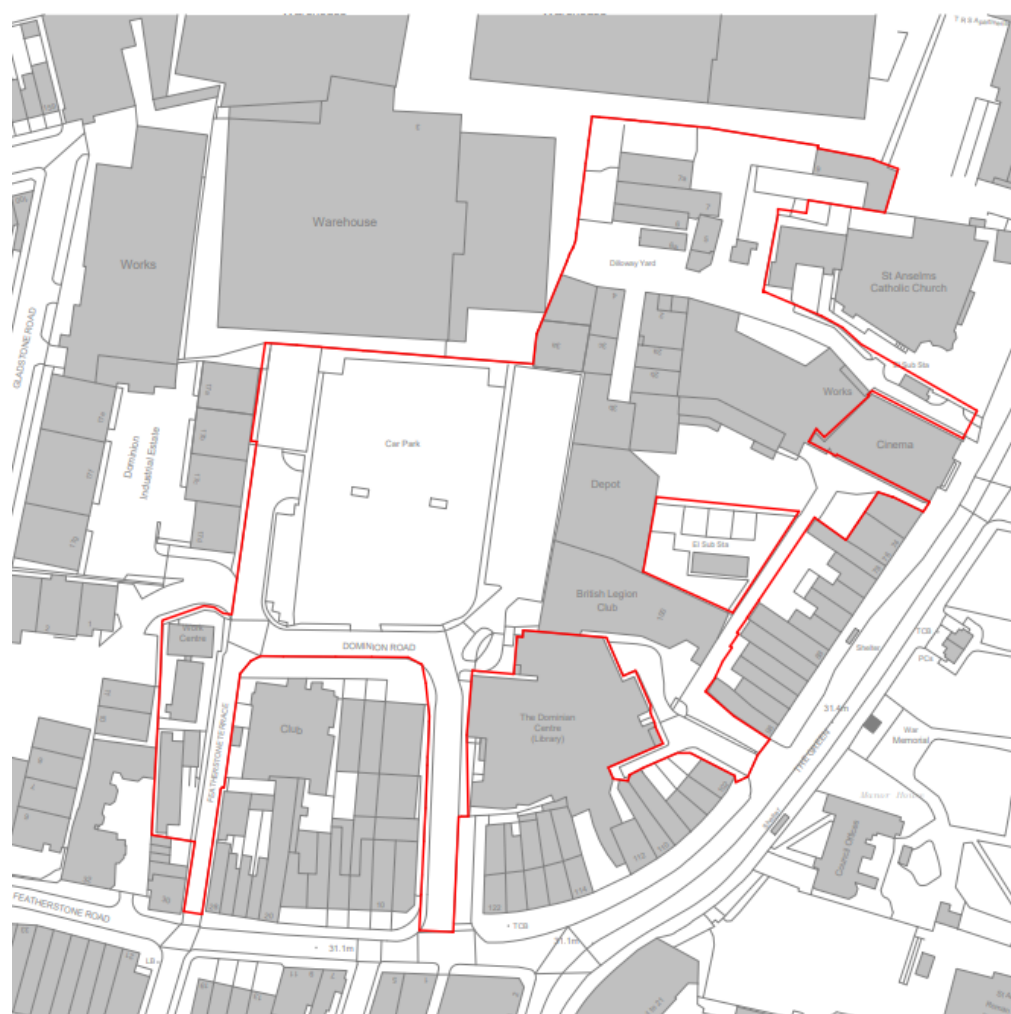


Figure 2.1 – Site Location Plan (Hunters, 2021)

- 2.2.** Existing uses include a number of industrial units typically associated with vehicle repairs around Dilloway Yard, a dairy, two banqueting suits (Monsoon Banqueting and Milan Palace) and community space located in two temporary buildings along Featherstone Terrace. The majority of these premises appear dated with safe and secure vehicular and pedestrian access being a particular constraint for many of these.

- 2.3** In addition to the businesses on the Site, there is a large public car park which provides 150 spaces (15 of which are reserved for members and staff of The Gym Group) owned by the London Borough of Ealing. Immediately next to the public car park is a private car park of 39 spaces for use by staff and visitors of the neighbouring Dominion Centre which provides a community centre, library and health centre
- 2.4** There are three principal vehicular access points into the Site. Featherstone Terrace and Dominion Road provide access from the south and Dilloway Yard provides access from the east. Dilloway Yard is a single access road cul-de-sac and does not connect with the rest of the Site. This is a major constraint for the Site at present as it hinders pedestrian and vehicular movement around the Site and has safety implications.
- 2.5** The Site also comprises a small section of St Anselm's Church car park, situated to the north of the Site.
- 2.6** Pedestrian access is at the same locations as the aforementioned vehicular accesses. Notably, there is no direct access to the parade of the shops along The Green from the public car park situated on the Site. As such, pedestrians have to walk southwards along Dominion Road and then eastward along Featherstone Road to access The Green. Existing pedestrian linkages across the Site are therefore relatively poor.
- 2.7** The Site has a PTAL rating of 3 and 4, with 4 being towards the eastern part of the Site nearest The Green and Southall station. Southall Station is located approximately 0.25 miles to the north of the Site and is served by Great Western Rail and TfL Rail with services into Central London and the Thames Valley. Southall Station will also be served by Crossrail services, significantly enhancing the area's connectivity. The Green is also well-served by buses with links to Greenford, Hounslow, Northolt and Heathrow Airport. Therefore, whilst pedestrian linkages across the Site are currently poor, the location as a whole has good connections to public transport.
- 2.8** The Site is not in a conservation area and there are no conservation areas within close proximity of the Site. The Southall Manor House, on the eastern side of The Green, is Grade II* listed and the Southall War Memorial to the north of the Manor House is Grade II listed.
- 2.9** There are Local Heritage Assets located nearby including the former stable and coach station situated opposite Osterley Park Road and directly to the south of St Anselm's Church which is in use as a substation. This building is proposed to be demolished under this application with the substation relocated to facilitate a safe two way vehicular and pedestrian access into the Site. The cattle trough located outside 55 The Green is also locally listed.
- 2.10** The Site is in Flood Zone 1 on the Environment Agency 'Flood Map for Planning (Rivers and Seas)' which is classified as *"land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding"*.
- 2.11** There are a limited number of trees on the Site with the majority of these being low value as set out in Arboricultural Survey submitted with this application.

SITE PLANNING HISTORY

- 2.12** We have carried out a desktop planning history review of the records available on London Borough of Ealing's website but have not found any applications on the Site that would be material or of relevance to this application.

SURROUNDING CONTEXT

- 2.13** The surrounding area comprises a mixture of industrial, commercial, retail and residential uses.
- 2.14** The south and west of the Site is predominantly occupied by light industrial, warehousing and storage units, the majority of which form part of the Featherstone and Dominion industrial estates, serviced by Featherstone Terrace. To the north lies the Sutterwalla Industrial Estate which has its own access along Southbridge Way.
- 2.15** The Tudor Rose building borders the Site to the east, which is considered by the London Borough of Ealing to be an important cultural and community asset.
- 2.16** Further east lies The Green which mainly comprises of a parade of shops and community uses such as the Dominion Centre, the Manor House and St Anselm's Church. Residential dwellings are located on some of the upper floors of the retail units.
- 2.17** The profile and character of the surrounding area is in the process of change, particularly to the north of the Site around Southall station. In this regard, there are a number of developments which have been approved by the Council over recent years. These are summarised in the sections below, many of which have been completed.
- Southall Gas Works (ref. 2008/3981) – Redevelopment of site to provide 4,700 sq.m. leisure (cinema), 320,000 sq.m. residential, 14,200 sq.m. non-food retail, 5,850 sq.m. food retail, 1,750 sq.m. A3-A5 floorspace, 9,620 sq.m. hotel, 3,000 sq.m. conference and banqueting, 2,550 sq.m. health care facilities, 3,450 sq.m. education facilities, 3,500 sq.m. office, 390 sq.m. sports pavilion and 600 sq.m. energy centre – Approved 29 September 2010.
 - Havelock Estate (ref. PP/2013/3241) – Redevelopment to provide 922 residential units, 840 sq.m. commercial floorspace, 280 sq.m. community floorspace and new public open spaces – Approved 24 April 2015.
 - Former Malgavita Works (ref. 164015FUL) – Redevelopment of site to provide 5-22 storey perimeter building, 302 residential units, 826 sq.m. flexible commercial floorspace and car and cycle parking – Approved 20 April 2017.
 - Former Honda Garage (ref. 164160FUL) – Redevelopment of site to provide 5-12 storey perimeter building, 170 residential units and car and cycle parking – Approved 17 August 2017.
 - Southall Men's Club (ref. 166501FUL) – Demolition of building and creation of 34 residential units and cycle parking – Approved 29 September 2017.

- Former Esso Petrol Station (ref. 177742FUL) – Residential mixed-use development for 166 residential units at 16-19 storeys – Approved 20 April 2018.
- Arches Business Centre (ref. 181380FUL) – Redevelopment to provide 15-23 storey buildings, 571 residential units, 2,100 sq.m. office floorspace, 424 sq.m. flexible commercial floorspace – Approved at committee 4 December 2018, awaiting completion of Section 106 Agreement.
- Kings House (ref. 164285FUL) – Demolition of existing building and erection of 20 storey mixed use development, 77 residential units, 933.9 sq.m. flexible commercial floorspace, 82 sq.m. retail floorspace – Approved 9 August 2019.
- Middlesex Business Centre (ref. 183673OUT) – Redevelopment of site to provide up to 2,083 residential units, up to 7,199 sq.m. hotel, up to 2,688 sq.m. flexible retail floorspace and up to 10,076 sq.m. flexible office and community floorspace – Approved 15 May 2019.
- 52 The Green (ref. 183653FUL) - Construction of a four-storey building for community facilities (D1 Use Class) on the ground and first floor levels and residential accommodation in multiple occupation comprising 9no. bedrooms for a maximum of 15 people (Sui Generis Use Class) on the first and second floor levels including associated communal areas, cycle storage and refuse storage provision – Approved 28 November 2018.
- Southall Sidings (ref. 201888FUL) – Demolition of all existing buildings and hardstandings and erection of affordable and market residential development (Use Class C3) in 5 blocks, communal space, plant rooms, cycle and disability car parking, refuse/recycling storage, electricity sub-station, new service road, vehicular and pedestrian accesses and associated highway works, new amenity space and landscaping – Approved at committee 17 September 2020, awaiting completion of Section 106 Agreement.
- 22-28 Featherstone Road (ref. PP/2015/6723) - Construction of a six storey block (following demolition of the existing buildings) comprising commercial/retail unit on ground floor level and 23 self-contained flats, provision of cycle spaces, and storage for residential and commercial refuse and recycling – Approved 23 December 2020.

2.18 The above permissions demonstrate the large degree of regeneration and transformation that is taking place within Southall.

2.19 Whilst the majority of these developments are located a sufficient distance away from the Site to not require any cumulative assessment under this application, the Southall Men’s Club permission is located in close proximity of the Site on Dominion Road and has been considered in the context of the proposals, particularly in relation to landscaping proposals to ensure that materials and surfacing are coordinated.

3.0 THE PROPOSED DEVELOPMENT

THE PROPOSAL

- 3.0** The proposals involve the demolition of all existing buildings on the Site with new development comprising of three urban blocks (A, B & C) which will vary in height, ranging between two and 19 storeys (ground inclusive). The development will be phased.
- 3.1** The proposed development will be mixed use comprising 2,922.8 sq.m. of flexible commercial uses (Class E, F1 & F2) and 564 residential dwellings (Class C3).
- 3.2** The flexible commercial uses are predominately arranged at ground floor with a small quantum on the first floor of Block B. The flexible non-residential floorspace is broken down as follows:
- Commercial (Use Class E) – 2,502.1 sq.m.
 - Nursery (Use Class F1) – 313.8 sq.m.
 - Community (Use Class F2) – 106.9 sq.m.
- 3.3** The above uses will deliver activity and vibrancy at ground floor level and the mix of uses sought will help provide variety to ensure that streets remain active throughout various parts of the day. The units have been designed flexibly to allow units to change between uses should need and demand change.
- 3.4** At ground level, a high quality public realm will provide informal seating, ornamental planting and raised planters along with new pedestrian links that will provide a direct connection between the Site, The Green and the Manor House. The pedestrian route will continue further into the Site towards a central boulevard which has the potential to be used for temporary markets or events associated with the Dominion Centre which, as a result of the development, will have the potential of a new north-facing frontage.
- 3.5** The residential accommodation will be predominately located on the upper floors of each of the urban blocks. Residential uses will be located on the ground floor of Block A. The units will consist of a mixture of unit sizes and tenures, all of which will meet housing standards set by the Mayor. Each unit will have a private balcony and all with access to landscaped communal amenity space located on the podiums of Block A and Block B. The podiums will also provide children's play space.
- 3.6** The proposals seek to provide 50% affordable housing on a habitable room basis. This will be secured by a 60/40 split between affordable rented accommodation and intermediate accommodation. All of the proposed tenures will have the same access to the respective podium gardens to ensure inclusivity and help foster mixed and balanced communities.
- 3.7** 10% of the units (57 units) will be built to be capable of being adapted for wheelchair users should demand arise.
- 3.8** **Table 3.1** outlines the quantum of units proposed split by size and tenure.

Table 3.1 – Unit size and tenure breakdown by unit

Unit Size Breakdown – By Units								
No of bedrooms:	1B	2B		3B			4B	Total
	1B2P	2B3P	2B4P	3B4P	3B5P	3B6P	4B6P	
Total	259	66	178	2	41	8	10	564
<i>Percent</i>	44.9	43.3		10.8				100
Unit Tenure Breakdown – By Units								
No of bedrooms:	1B	2B		3B			4B	Total
	1B2P	2B3P	2B4P	3B4P	3B5P	3B6P	4B6P	
Affordable Rent	63	56		28			10	157
<i>Percent</i>	40.1	35.6		17.8			6.4	100
Shared Ownership	54	48		10			0	112
<i>Percent</i>	48.2	42.8		8.9			0.0	100
Market	142	140		13			0	295
<i>Percent</i>	48.1	47.4		4.4			0.0	100

3.9 Table 3.2 outlines the quantum of habitable rooms proposed split by size and tenure.

Table 3.2 – Unit size and tenure breakdown by habitable room

Unit Size Breakdown – By Habitable Rooms							
No of bedrooms:	1B	2B		3B			4B
	1B2P	2B3P	2B4P	3B4P	3B5P	3B6P	4B6P
No of units:	518	198	534	10	205	40	60
<i>Percent</i>	33	46.7		16.2			3.8
Unit Tenure Breakdown – By Habitable Room							
Tenure type:	Affordable Rent	Shared Ownership		Market			Total
No of units:	494	302		769			1,565
<i>Percent</i>	32	19		49			100

3.10 60 car parking spaces will be made available for the residential component of the development. This equates to approximately 11% of the total number of dwellings. 25 of these spaces would be located under the Block A podium, 31 spaces would be located under the Block B podium and four would be provided to the south of Block C.

3.11 Of the 60 spaces, 35 are to be provided as wheelchair accessible with the remaining 25 spaces being standard parking bays.

3.12 Given that there are currently public parking spaces on the Site, it is proposed that 90 public car parking spaces will be provided as part of the proposals. 45 of these will be located to the east of Block C, 32 to the west of Featherstone Terrace, eight to the south of Block A and five on the access road to Blocks B and C. 10

of the public car parking spaces will accommodate wheelchair users. Whilst this represents a decrease compared with the current 150 spaces, the proposed provision seeks to achieve a balance between the Site's public transport accessibility and supporting the town centre through the provision of parking spaces. Furthermore, prior to submission of this application (2015-2016 and 2019), the Council undertook surveys of the Featherstone Terrace car park usage, which indicated that the car park was not being well-used. Whilst these surveys are relatively dated, they are still considered to be robust. Furthermore, the effects of Covid-19 would provide limitations to an updated survey.

- 3.13** 20% of the residential parking spaces will have active provision for electric charging, whilst the remaining 80% of the residential parking will have passive provision. 10% of the public parking spaces will have an active provision, and this is an increase from the 3 existing EV charging points provided on Site to 9 EV charging points proposed as part of the development scheme.
- 3.14** There are a number of existing car club spaces in the area. These include a space on Samara Drive, to the north west of the Site, and several spaces at Norwood Road, located to the south east of the Site. As part of the proposals, one of the parking spaces within the public car park will be leased to a car club operator.
- 3.15** A total of 1,006 residential cycle parking spaces are proposed and will be provided in the mezzanine level of Block A, the ground floor and first floor of Block B, and the ground floor of Block C. This includes space for 46 oversized bikes.
- 3.16** The non-residential uses will be provided with 24 long-stay cycle parking spaces which will be secured and covered. These will be provided in the undercroft of Block A and the undercroft of Block B.
- 3.17** A total of 44 short-stay spaces will be provided with cycle hoops spread across the Site.
- 3.18** Servicing, deliveries and refuse collection will take place from on-street loading bays. The [Transport Assessment](#) includes further details of these arrangements.

PHASING

- 3.19** It is anticipated that the development will come forward in three distinct phases, albeit with phases running more or less concurrently given the close linkages and interdependencies between them. The first phase involves delivery of Block A, which comprises redevelopment of the existing car park and coach park and the temporary buildings located along Featherstone Terrace. There is potential for the proposed car park along Featherstone Terrace to be delivered early in the project to mitigate the loss of public car parking during construction of Block A. This will be confirmed once a contractor has been appointed and therefore which is why a final phasing plan is sought by condition.
- 3.20** Delivery of Block B will follow, which comprises redevelopment of the two banqueting suites and industrial units located along Dilloway Yard and to the west of The Green.
- 3.21** Block C will be the final phase to come forward, and comprises redevelopment of the vehicle repair shops located on the northern boundary of the Site.
- 3.22** An indicative phasing plan is included at [Figure 3.1](#) below.



Figure 3.1 – Indicative phasing plan (Hunters, 2021)

4.0 PLANNING POLICY CONTEXT

4.0 This Application has been informed by the adopted development plan policies and other relevant guidance. This section of the Statement provides a summary of the planning context.

STATUTORY FRAMEWORK

4.1 Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.

NATIONAL PLANNING POLICY GUIDANCE

4.2 The revised National Planning Policy Framework (the “NPPF”) was published in February 2019 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements. The NPPF sets out the Government’s approach to planning matters, and is a material consideration in the determination of planning applications.

4.3 **Paragraph 11** notes that plans and decision should apply a presumption in favour of sustainable development. For decision-making, this means:

- approving development proposals that accord with an up-to-date development plan without delay; or
- where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

4.4 The National Planning Practice Guidance (“The NPPG”) was first published in 2014 and is updated from time to time. It is also a material consideration and should be read in conjunction with the NPPF.

THE DEVELOPMENT PLAN

4.5 The statutory development plan for the Site comprises:

- London Plan (2021);
- Ealing Development DPD (2012);
- Ealing Development Sites DPD (2013);
- Ealing Development Management DPD (2013); and
- Joint West London Waste Plan (2015).

KEY MATERIAL CONSIDERATIONS

4.6 In addition to the Development Plan, the following documents are identified as key material considerations to this assessment:

- Mayor of London View Management Framework SPG (2012);
- Mayor of London Housing SPG (2016);

- Mayor of London Opportunity Area Planning Framework (2011);
- The Southall Opportunity Area Framework (2014); and
- The Southall Green Supplementary Planning Document (2017).

The GLA are also in the process of preparing the following additional Supplementary Planning Guidance, which were consulted on in January 2021:

- Good Quality Homes for all Londoners (October 2020);
- Public London Charter (October 2020);
- Circular Economy Statements (October 2020);
- Whole-life Carbon Assessments (October 2020); and
- 'Be Seen' Energy Monitoring Guidance (October 2020).

SITE DESIGNATIONS AND ALLOCATIONS

- 4.7** Southall is designated as an Opportunity Area in the London Plan, which is an area considered suitable for accommodating large-scale mixed use development.
- 4.8** The Site forms part of a wider site designation in the Development Sites DPD known as “SOU8 – The Green”. This includes the Site as well as land to the north (up to the railway line) and land to the west (up to Gladstone Road and Harrington Road).
- 4.9** Site Allocation SOU8 supports the following:
- “Mixed use development appropriate to the town centre, with continued protection of existing industrial uses on Featherstone, Dominion and Suterwalla estates as a Locally Significant Industrial Site (LSIS) and retention of the Dominion Arts Centre”.*
- 4.10** The eastern part of the Site is located within the King Street Neighbourhood Centre and the majority of the Site lies within an Area of Archaeological Interest.
- 4.11** A small part of the Site (approximately 364 sq.m.), located to the west of the public car park, comprises a private coach park and falls within the Locally Significant Industrial Site (“LSIS”) designation. Whilst we understand from Officers that this is a mapping error, for robustness, we have assessed the principle of development on this part of the Site in [Section 5.0](#).

5.0 LAND USE PRINCIPLES

5.0 This Section assesses the principles of the proposed development against the statutory development plan and other material considerations as outlined in [Section 4.0](#).

PRINCIPLE OF DEMOLITION

5.1 The majority of the Site comprises surface car parking, however, there are a number of existing buildings on the Site which would be demolished as part of the proposals. These predominantly include single and two storey industrial warehouses and sheds, as well as the locally listed substation building to the south of St Anselms Church.

5.2 As set out in the submitted Heritage and Townscape Assessment, the industrial warehouses and sheds have no particular historic or architectural value. They also appear dated with unsuitable access and servicing. Indeed, the majority of these uses rely on Dilloway Road for access. Dilloway Road is a single lane vehicular access approximately 3.2 metres wide with no footpath to provide safe pedestrian access to the uses beyond. There is also a kink in the road making visibility challenging for vehicles and pedestrians. This current arrangement is therefore heavily convoluted and presents obvious highway and pedestrian safety challenges.

5.3 The proposed development necessitates the demolition of the locally listed substation located on the eastern boundary of the Site, between St Anselm's Church and the Tudor Rose. It comprises a two storey, brown brick building with painted gables and steps to a first floor entrance. The submitted Heritage and Townscape Assessment outlines that the substation has unattractive modern alterations and does not share any significant associations with persons or events of note. We consider that the substation has a contained setting, between a pedestrian route and a large car park, and therefore the setting makes no particular contribution to its significance. The Heritage and Townscape Assessment concludes that given the low level of significance of the building to be demolished, the limited area in which it will be experienced, and the necessity of the works to deliver the redevelopment of the wider site, the demolition is, on balance, considered to be acceptable.

5.4 Not only do we consider that the demolition of these buildings is justified from both an architectural and functional perspective (i.e. poor state of repair and access constraints), the Southall Green SPD envisages that development coming forward within Site Allocation SOU8 is done so in a comprehensive and coherent way that secures the objectives set out in the adopted policy. As set out in this Statement along with the other application supporting reports, it is our strong view that that the demolition of these buildings as part of a comprehensive redevelopment will best allow the objectives of Site Allocation SOU8 to be delivered, namely:

- The need to provide safe access into the Site for vehicles and pedestrians;
- The need to service retail and commercial units fronting The Green from the rear;
- The need to provide active frontage along The Green;
- The need to provide high quality design; and
- The need to make effective use of land.

5.5 We consider therefore that the principle of demolition is acceptable provided that there is a case for the principle of redevelopment. This is now discussed.

PRINCIPLE OF REDEVELOPMENT

5.6 Paragraph 11 of the NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development. For decision making this means:

“...c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

5.7 The NPPF encourages making effective use of land and Paragraph 117 sets out that planning policies and decisions should promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 118 states that planning policies and decisions should give substantial weight to the value of using brownfield land within settlements for homes and other identified needs. Development should also promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

5.8 Similarly, Paragraph 122 of the NPPF sets out that planning policies and decisions should support development that makes efficient use of land, taking into account the identified need for different types of housing and other forms of development, and the availability of land for accommodating it.

5.9 Southall has been identified by the Mayor of London as an Opportunity Area, with an overall indicative employment capacity of 2,000 jobs and a target of 2,000 new homes. Southall will therefore be a major focus for growth. The Southall Opportunity Area and the Southall Green SPD suggests that The Green area has a capacity for 450 new homes, 1,500 sq.m. of retail and 3,500 sq.m. of B1 business floorspace.

5.10 Policy EA (*Presumption in Favour of Sustainable Development*) of Ealing’s Development Management document states that when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF. The Council will also work proactively with applicants to jointly find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

5.11 Policy 2.8 (*Revitalise Southall Town Centre*) of Ealing’s Development Core Strategy sets out a number of objectives. Of relevance to the Site are:

- to regenerate Southall Town Centre through the provision of up to 3,320 additional mixed tenure homes;
- to provide a high quality mainstream retail offer to complement the Asian offer elsewhere within the centre including the development of up to 24,000 to 32,000 sq.m. of gross retail floorspace;
- to modify Southall station to cater for Crossrail services to provide increased capacity, improved facilities, enhanced station integration and interchange;

- to provide additional community facilities – including a new community hub comprising a library and health centre; and
- to cater for and enhance Southall’s heritage assets through proposals such as the refurbishment of Manor House, Southall Town Hall and the Himalaya cinema to accommodate a range of retail and community uses whilst establishing linkages to wider regeneration proposals affecting the town centre.

5.12 With regards to the objectives identified above, the Dominion Centre was refurbished in 2014 and provides community facilities including a library and a health centre, and the Grade II* Manor House was refurbished in 2017. Southall Station has also been modified in advance of the imminent introduction of Crossrail. A number of objectives of the policy have therefore already been delivered and the principle proposed development which includes mixed tenure homes, provision for retail and additional community uses would help complete this.

5.13 As noted in **Section 4.0**, the Development Sites DPD allocates specific sites in the Borough for development. The Site falls within part of Site Allocation SOU8. Allocation SOU8 supports *“Mixed use development appropriate to the town centre, with continued protection of existing industrial uses on Featherstone, Dominion and Suterwalla estates as a Locally Significant Industrial Site (LSIS) and retention of the Dominion Arts Centre”*.

5.14 In light of the above, we consider that the principle redevelopment of a currently under-utilised, brownfield site for mixed-use development including residential, employment and town centre uses is consistent with development plan policy. The proposals, including the demolition of the existing buildings, are also necessary to ensure that the objectives of Site Allocation SOU8 and other development plan policies can be achieved.

LOSS OF LOCALLY SIGNIFICANT INDUSTRIAL SITE

5.15 A small part of the Site is designated as an LSIS. This part currently comprises a private coach park extending to approximately 364 sq.m. (1.84% of the overall application site area) which we understand to fall within Class B8 use. Despite its LSIS designation, the coach park does not contain any floorspace, nor does the site sustain jobs. The Council advises that as this area is physically walled off and functionally separate from the rest of the LSIS, it constitutes a mapping error which will be corrected in the next review of the Local Plan.

5.16 The LSIS land therefore has very limited potential and its inclusion into the application proposals is in the interests of comprehensive development. Furthermore, this comprehensive development provides 2,923 sq.m. of flexible commercial floorspace (flexible Use Class E, F1 & F2) which we consider more than compensates for the loss of coach park. Indeed, it is estimated by the Applicant’s commercial advisors, Forty Group, that the development is likely to create at least 90 new jobs. Moreover, whilst the commercial floorspace is to be flexible, it is their view that the current anticipated demand is likely to predominately come from Class E(g) (ii) and (iii) uses meaning that the Site, as a whole, will continue to provide opportunities for light industrial type operators.

5.17 We therefore do not consider that there is any conflict with **Policy E6** of the London Plan as the proposals would replace a coach park that does not contain any floorspace or provide any jobs with an opportunity for new high quality Class E(g) (ii) and (iii) uses, amongst other flexible uses, that would generate jobs in excess of the number of jobs currently on the Site. This case is also put forward without the consideration of the fact that the area’s designation as an LSIS is a mapping error.

5.18 Moreover, and as explained below, the proposals, when taken as a whole, provide the potential to significantly increase the quantum of jobs on the Site and improve its economic function, both within a setting of brand new fit-for-purpose floorspace.

NON-DESIGNATED EMPLOYMENT SITES AND THE PRINCIPLE OF EMPLOYMENT USES

5.19 For the remainder of the Site, on which there are a number of existing industrial uses which are not designated LSIS, these would be considered by the London Plan to be Non-Designated Industrial Sites. In this regard, Part D of **Policy E7** (*Industrial intensification, co-location and substitution*) of the London Plan states that mixed-use or residential proposals should be supported where, *inter alia*, land has been allocated in an adopted local development plan document or residential or mixed-use development.

5.20 As noted above, the purpose of Site Allocation SOU8 is to achieve the regeneration and intensification of this town centre area, including new employment provision, by means of mixed-use development. As such, the principle of such mixed use development including residential on a non-designated industrial site is acceptable in principle and satisfies Policy E7.

5.21 The existing non-designated employment floorspace is predominantly located on the northern part of the Site known as the Dilloway Industrial Estate. The majority of the uses are vehicle repair garages. The buildings are typically in dated condition and would likely need substantial refurbishment to make them lettable in the future. Their retention as part of the proposed development is therefore not sustainable. They also suffer from a constrained vehicular access with a one-way in and out single access lane making the safe manoeuvrability of vehicles challenging.

5.22 From a floorspace perspective, we understand there to be approximately 3,414 sq.m. of industrial (B2/B8) employment floorspace across the Site. From a job creation perspective, we understand there to be approximately 66 employees across the Site although this figure includes employees of non-industrial uses such as the two banqueting halls. The quantum of jobs created through industrial employment uses is understood to be 53.

5.23 The proposed development would deliver 2,923 sq.m. of new high quality Use Class E , F1 & F2 floorspace which will generate a range of employment opportunities. The units have been designed flexibly to change between uses as demand for specific uses ebbs and flows. At present the range and quantum of uses proposed seeks to meet local need based on the findings of the Forty Group study. Importantly, the spaces have been designed so that they can be amalgamated and sub-divided providing opportunities for existing businesses currently on the Site as well as for start-ups and small businesses.

5.24 From a job creation perspective and based on the current anticipated demand focused towards Class E(g) (ii) and (iii) uses, Forty Group has estimated an employment demand for 90 jobs (FTE). This is based on 2,502 sq.m. of the 2,923 sqm of flexible commercial floorspace being Class E(g) (ii) and (iii) uses at an employment density of one employee per 30 sq.m. and 421 sq.m. being a nursery (Class E(f)) at a density of one employee per 60 sqm. As a flexible approach is sought to allow the commercial floorspace to interchange between uses subject to demand, the job creation will continue to change over time. However, the uses proposed by Forty Group are typically uses of a lower employment density than many of the other uses (e.g. retail or office) that could potentially operate from the site within the use classes sought. As such, we consider that the creation of 90 jobs is a cautious estimate and may well likely increase. Alongside jobs created once the development is completed, there would also be a significant number of jobs created through the construction period for which there would be opportunities for apprenticeships.

- 5.25 Therefore, despite the reduction in employment floorspace, the proposals would replace outdated stock with modern and sustainable high quality floorspace that is appropriate for a town centre location and would increase the quantum of jobs across the Site. We therefore consider that the proposals are consistent with Site Allocation SOU8 which seeks to improve and intensify the Site through mixed-use development.

PRINCIPLE OF RETAIL FLOORSPACE

- 5.26 As noted above, the application seeks flexible uses across all ground floor units. This not only helps respond to changes in demand but also provides the best opportunity for these units to be occupied, remain active and provide animation and interest at ground floor.
- 5.27 The principle of employment floorspace has been discussed above but as part of the flexible use class sought, there is potential for some of these units to be used for retail-type uses.
- 5.28 **Policy SD6** (*Town centres and high streets*) the London Plan sets out that the Mayor seeks the vitality and viability of London's varied town centres to be promoted and enhanced by ensuring town centres are the primary locations for commercial activity beyond the CAZ and important contributors to the local as well as London-wide economy.
- 5.29 Similarly **Policy E9** (*Retail, markets and hot food takeaways*) of the London Plan recognises that development proposals should seek to enhance local and neighbourhood shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping.
- 5.30 **Policy 2.8** (*Revitalise Southall Town Centre*) of Ealing's Development Core Strategy sets out the Borough's intentions to provide a high quality mainstream retail offer in Southall to complement the Asian offer elsewhere within the centre including the development of up to 24,000 to 32,000 sq.m. of gross retail floorspace.
- 5.31 The majority of the Site is located in the King Street Neighbourhood Centre and therefore the potential of introducing additional retail floorspace would only complement the existing retail offer and help enhance the vitality and viability of the centre.
- 5.32 The principle of providing retail floorspace, subject to there being demand, is therefore consistent with current development plan policy.

PRINCIPLE OF COMMUNITY USES

- 5.33 To allow the objectives of Site Allocation SOU8 to be achieved, the proposals require the demolition of buildings which house community facilities including two banqueting suites (Monsoon Banqueting and Milan Palace) as well as the temporary buildings to the west of Featherstone Terrace that are used for community events. The Applicant has undertaken a Full Equalities Analysis Assessment which was presented to the Council's Cabinet in June 2021 and which concludes that the proposed development does not have a negative impact on any local community groups with a protected characteristic. Furthermore, as part of the flexible commercial uses sought, there is potential for local community uses to be re-provided as part of development. Indeed, the proposals incorporate 106.9 sq.m. of community (Use Class F2) and 313.8 sq.m. of nursery (Use Class F1) floorspace and which has the potential to be increased subject to demand.
- 5.34 **Policy 2.8** (*Revitalise Southall Town Centre*) of Ealing's Core Strategy sets out that within Southall Town Centre the Council will seek to provide additional community facilities. In addition to the more traditional community-type uses, the proposals provide various flexible Use Class E spaces that have the potential to

provide opportunities such as those related to food and catering uses and which could tie in with and further enhance Southall's existing strong restaurant industry. These uses therefore have the potential to become genuine community uses with the potential to form supply chain links with existing local businesses and foster a local pound scenario.

- 5.35** In addition to the new community uses proposed, following redevelopment, there will remain a number of community uses in close proximity of the Site including the Tudor Rose, the Dominion Centre, and The Manor House. We are also aware that there are other banqueting suites within Southall ensuring there would still be such facilities in the locality. We therefore consider that there will continue to be opportunities for community-based events to take place in the local area.
- 5.36** **Policy HC5** (*Supporting London's Culture and Creative Industries*) of the London Plan seeks to protect existing cultural venues, facilities and users where appropriate and support the development of new cultural ventures in town centres. As noted above, through thorough consultation with local stakeholders, the decision was made through the design process to retain the Tudor Rose building because of its importance as a cultural and community asset, particularly to the Black Caribbean community. We therefore consider the proposals are a positive response to **Policy HC5**.
- 5.37** In summary, despite the demolition of buildings that are currently host a variety of events, we consider that on balance, through a combination of the proposed community provision as well as the range of community uses in the locality, that the development addresses the relevant development plan policies.

PRINCIPLE OF RESIDENTIAL USE

- 5.38** **Section 5** of the NPPF emphasises the need to deliver a sufficient supply of homes and states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed.
- 5.39** **Policy H1** (*Increasing housing supply*) of the London Plan sets out that Boroughs should seek to achieve and exceed their relevant minimum borough average housing targets. In the London Plan the minimum ten-year target for housing in Ealing (2019-2029) is 21,570 dwellings, a substantial increase in the number of new homes that need to be delivered over the next ten years.
- 5.40** **Policy H1** (*Optimising housing potential*) of the London Plan emphasises that Boroughs should seek to optimise the potential for housing delivery on all suitable and available brownfield sites.
- 5.41** **Policy 1.1** of Ealing's Development DPD states that new homes, businesses and retail space will be primarily concentrated in the Uxbridge Road / Crossrail Corridor, particularly focussed, *inter alia*, around key stations such as at Southall.
- 5.42** The Site, in its current state, consists of under-used, brownfield land in the Uxbridge Road Corridor. The proposed development seeks to provide 564 residential units (Use Class C3) which will assist with meeting the London Plan's housing targets for the Borough.
- 5.43** In light of this and in the context of the Site Allocation we consider the development of residential use to be acceptable in this location and that the development potential of the Site has been optimised.

AFFORDABLE HOUSING

5.44 London Plan **Policy H5 and H6** and Ealing Local Plan **Policy 3A** seek a target provision of 50% affordable housing as part of new developments. This will consist of a 60 / 40 split of social or affordable rented accommodation to intermediate provision.

5.45 The proposed development will provide 50% affordable housing on a habitable room basis (see **Table 5.1**) and therefore there is no requirement for a viability assessment because the target of 50% affordable housing will be achieved.

Table 5.1 – Proposed affordable housing split by habitable room

Tenure	Habitable Rooms	Percentage
Affordable Rent	494	32
Shared Ownership	302	19
Market Sale	769	49
Total	1,565	100

The rental levels of the affordable rent and shared ownership will be set by the Council and the GLA and secured in perpetuity via a legal agreement.

Whilst the Applicant is actively exploring First Homes which were introduced on 28 June 2021, they are not being considered for this Application which is acceptable under the transitional periods of the First Homes Guidance published by the Government. In this regard, sites with planning permission in place prior to 28 December 2021 or in significant pre-application engagement determine before 28 March 2022 are not required to provide First Homes.

DENSITY

5.46 **Paragraph 123** of the NPPF states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.

5.47 London Plan **Policy D2** (*Infrastructure requirements for sustainable densities*) states that the density of development proposals should:

- 1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels; and
- 2) be proportionate to the site’s connectivity and accessibility by walking, cycling and public transport to jobs and services (including both PTAL and access to local services).

5.48 London Plan **Policy D3** (*Optimising site capacity through the design-led approach*) sets out how all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations.

5.49 **Policy 3.4** (*Optimising Housing Potential*) of Ealing’s Development Management Plan states that appropriate density ranges in Ealing will normally be “Urban” in Southall.

5.50 In accordance with **Policy 3.4**, the proposed development seeks to achieve a density of 301 units per hectare, which equates to 835 habitable rooms per hectare. We consider such a density is appropriate for an urban site.

5.51 The Site comprises brownfield / previously-developed land and therefore presents an excellent redevelopment opportunity. It is situated in a town centre location with good access to local services and strong public transport links. It has a good PTAL rating which indicates that high density development in this location can be suitably accommodated. The introduction of Crossrail at Southall station will further improve the Site's connectivity and accessibility by public modes of transport, thus supporting high density and sustainable development.

5.52 The proposals have been design-led but also ensure optimal use of the Site's development potential is achieved, in line with national, regional and local policy requirements.

UNIT MIX

5.53 London Plan **Policy 10** (*Housing size mix*) states that schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:

1. robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment
2. the requirement to deliver mixed and inclusive neighbourhoods
3. the need to deliver a range of unit types at different price points across London
4. the mix of uses in the scheme
5. the range of tenures in the scheme
6. the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity
7. the aim to optimise housing potential on sites
8. the ability of new development to reduce pressure on conversion, subdivision and amalgamation of existing stock
9. the need for additional family housing and the role of one and two bed units in freeing up existing family housing.

5.54 The Mayor's Housing SPG advises that the nationally-described space standard should be applied to all new dwellings. **Policy D6** (*Housing quality and standards*) of the London Plan sets out more prescriptive internal space standards for individual habitable rooms.

5.55 Ealing's planning policy also encourages a mix of units on development sites. The proposed development proposes the following unit mix:

Table 5.2 – Proposed unit mix

No of Bedrooms	1-bed	2-bed	3-bed	4-bed
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	1B2P	2B3P	2B4P	3B4P	3B5P	3B6P	4B6P
Total	259	66	178	2	41	8	10
Percentage	45.9	11.7	31.6	0.4	7.3	1.4	1.8
Total	259	244		51			10
Percentage	45.9	43.3		10.8			

5.56 Across all tenures combined, the proposals comprise 31.6 % 2-bed 4 person units, 10.8% 3-bed and 4-bed units, all of which are considered family-sized accommodation. As a whole therefore, 42.4% of the proposed development provides accommodation suitable for families. We therefore consider that the proposed unit mix provides a range of unit sizes to appeal to a variety of households and is compliant with the London Plan and Ealing Development Plan policies.

5.57 Amongst the affordable rent accommodation specifically, it is proposed that 23.1% of the units will be 2-bed 4 person units and that 40.5% of the units will be 3-bed and 4-bed units. This equates to 63.5% of the affordable rent accommodation being family-sized accommodation and is a direct and positive response to meeting local housing needs.

HOUSING QUALITY

5.58 London Plan **Policy D4** (*Housing quality and standards*) sets out that housing development should be of high quality design, and provide adequately-sized rooms with comfortable and functional layouts, which are fit for purpose and meet the needs of Londoners.

5.59 Dwellings are expected to provide at least the following gross internal floor area as set out in the table below.

Table 5.3 – GLA Minimum internal space standards for new dwellings

Number of bedrooms	Number of bedspaces (persons)	1 storey dwelling (sq m)
1B	2P	50
2B	3P	61
	4P	70
3B	4P	74
	5P	86
	6P	95
4B	6P	99

London Plan Policy D4 (2021)

5.60 All the proposed dwellings accord with and in some cases exceed these minimum internal space standards. The design also ensures the rooms comprise comfortable and functional layouts.

5.61 **Policy D4** of the London Plan sets out that the minimum floor to ceiling height must be 2.5m for at least 75% of the GIA of each dwelling. All floor to ceiling heights in the proposed development accord with these requirements.

- 5.62** Part C of **Policy D4** states that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. The proposed development will provide 76% of units as dual aspect. The proposals have also been carefully designed to ensure that there are no single aspect north-facing units.
- 5.63** Part D of **Policy D4** outlines 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.
- 5.64** A full assessment of daylight and sunlight is provided in Avison Young report and is discussed in detail in **Section 6.0** of this statement. It confirms that the proposed development will not result in any adverse impacts on daylight and sunlight as a result of the scheme and the design has been optimised to ensure acceptable daylight and sunlight conditions are experienced within the outside amenity space.
- 5.65** In terms of private outside space standards, London Plan **Policy D4** states that where there are no higher local standards in the borough development plan, a minimum of 5m of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant.
- 5.66** The proposed development provides residents with access to high-quality communal amenity space in the form of two podium-level resident gardens. These are located to benefit from a south facing orientation and incorporate three types of space; a planted garden and social space, flexible open lawn area and a defined play area.
- 5.67** In terms of accessibility, London Plan **Policy D7** (*Accessible housing*) sets out that residential development must ensure that:
- 1) At least 10 per cent of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings'; and
 - 2) All other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
- 5.68** The proposed development will provide 57 homes capable of being adapted to wheelchair users. This comprises 10% of the total 564 units and accords with **Policy D7**. These have been strategically located at the lower levels of the blocks across all tenures, as follows:
- Levels 1-6 in Blocks A1-A4;
 - Levels 2-5 in Blocks B1-B2; and
 - Levels 1-3 in Block C1.
- 5.69** Further details of the distribution of wheelchair accessible homes are included in the **Design and Access Statement**.

6.0 DESIGN AND HERITAGE

DESIGN CONSIDERATIONS

- 6.0** Paragraph 122 of the NPPF sets out that planning policies and decisions should support development that makes efficient use of land, taking into account the desirability of maintaining an area's prevailing character and setting, or of promoting regeneration and change and the importance of securing well-designed, attractive and healthy places.
- 6.1** Section 12 of the NPPF relates to 'Achieving well-designed places' and sets out that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Paragraph 127 states that planning policies and decisions should ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁶; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 6.2** Paragraph 131 outlines that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 6.3** The proposed development incorporates high-quality architecture and a carefully considered layout which respects both the established and emerging townscape of Southall. The proposals are sympathetic to the height, scale and massing of the existing buildings along The Green and careful regard has been paid to the setting of the Grade II* Manor House.
- 6.4** The proposed development incorporates high-quality soft landscaping and engaging and attractive areas of public realm which will enhance the user experience along The Green and assist with the creation of a strong sense of place.

- 6.5 The Council's Secured by Design team was consulted during the design development process and the proposals have evolved through these discussions to ensure a safe, inclusive and accessible scheme is delivered.
- 6.6 The scheme has also been developed in accordance with sustainable design and construction best practices. Further details of these practices are set out in later in this Statement onwards.
- 6.7 Further design details are set out in the submitted [Design and Access Statement](#).

PRINCIPLE OF TALL BUILDINGS

- 6.8 Both the London Plan and LB Ealing's development plan include tall building policies for which the scheme must be assessed against. The proposed development is assessed against these policies below and from this assessment we conclude that the development is acceptable.

Table 6.1 – Assessment against London Plan Policy D9 Criteria for Tall Buildings

Part B - Locations	
<p>1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.</p> <p>2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.</p> <p>3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.</p>	<p>As Policy D9 is a new policy, it will take time for Borough's to update their local plans in accordance with this requirement. Under the previous version of the London Plan, the principle of tall buildings were accepted in principle in Opportunity Areas, which included the Southall Opportunity Area.</p> <p>Nevertheless, Policy 1.2 (h) of the Ealing Development Strategy states that "<i>tall buildings are acceptable where they contribute positively to the urban environment and do not cause harm to existing heritage assets</i>". The suitability of the Site for tall buildings has been robustly appraised through detailed townscape and heritage work with verified views undertaken to assess the impact of the scheme.</p> <p>Pre-application engagement has also been undertaken with Historic England in acknowledgement of the Site's proximity to the Grade II* listed Manor House, and who have confirmed that the scheme is unlikely to adversely affect the setting or significance of the Manor House</p>
Part C – Impacts	
Development proposals should address the following impacts:	
1) VISUAL IMPACTS	
<p>a) the views of buildings from different distances:</p> <p>i. long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views;</p>	<p>The Heritage and Townscape Assessment includes a visual assessment of 19 identified views, which incorporate long-range, mid-range and immediate perspectives. It outlines that in views towards the Site, the proposed buildings would be a high quality, attractive new feature which would positively impact on visual amenity, and aid in wayfinding and the legibility of the townscape.</p>

<p><i>ii. mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality;</i></p> <p><i>iii. immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy</i></p>	
<p><i>b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding</i></p>	<p>The proposed development will form part of a sequence of tall buildings, each forming part of a common theme to ensure consistency across the development site. The orientation of the buildings will also enhance the view through the Site to the Manor House and Gardens and enhance connectivity along The Green.</p>
<p><i>c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan</i></p>	<p>As demonstrated in the Design and Access Statement, the proposals adopt the highest standard of architecture and design. The proposals relate well to the emerging townscape area and have been designed to respond to the existing character and urban grain of the surrounding street-scene. The flexible commercial units at ground floor will provide active frontages and associated landscaping improvements, resulting in an attractive public realm which provides links to the Manor House and Gardens.</p> <p>The form and composition of the buildings has been consciously developed to have a simple, refined appearance. The scale and proportions of the new built form have been carefully considered, and the new buildings have been designed with a defined top, middle and bottom with active frontages at ground floor.</p> <p>The Site straddles two distinct townscape character areas. To address this the new buildings are arranged in three interrelated blocks, indicated as A, B and C, and these will comprise an arrangement of visibly distinct towers, which are unified through the use of a common architectural language to create a cohesive, legible development.</p> <p>The materials of the new buildings have been developed mindful of their relationship with the surrounding context, and the colour palette has been given particular consideration. The distance between the buildings will create a sense of openness, and contribute to a sense of depth at the Site. Fundamental to the scheme is the</p>

	<p>creation of high-quality, landscaped public realm, which will draw visitors into the Site, and provide an attractive setting for the new blocks. The present hardstanding, car parking and irregular circulation routes will be replaced with a planned central space with identified activity areas, contributing to a vibrant character. The landscaping will respond to the identified character areas, creating a welcoming entrance opposite Southall Manor House with open space for a market, contributing to the bustling urban character of the area. The ground floor commercial units will introduce active frontages, creating an attractive environment for visitors.</p>
<p><i>d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area</i></p>	<p>Pre-application engagement has been undertaken with Historic England in acknowledgement of the Site's proximity to the Grade II* listed Manor House, and who have confirmed that the scheme is unlikely to adversely affect the setting or significance of the Manor House.</p> <p>The Heritage and Townscape Assessment concludes there would be a low level of harm attached to the demolition of the locally listed substation. However, as this is a non-designated heritage asset, this should be considered under paragraph 197 of the NPPF, and whereby given the low level of significance of the building to be demolished, the limited area in which it will be experienced and the necessity of the works to deliver the redevelopment of the Site, the demolition is, on balance, considered to be acceptable. Furthermore, the Assessment confirms that there would be no harm to designated heritage assets meaning that an assessment against Paragraph 196 of the NPPF is not required. Notwithstanding this, if the decision-maker was to conclude that there would be harm to designated heritage assets, in our view, it would certainly be less than substantial and comfortably outweighed by the significant public benefits being provided by the scheme, as required by the NPPF and outlined in Section 9.0 of this Statement.</p>
<p><i>e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it</i></p>	<p>Not applicable.</p>
<p><i>f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river</i></p>	<p>Not applicable.</p>
<p><i>g) buildings should not cause adverse reflected glare</i></p>	<p>The choice of building materials, as set out in the submitted Design and Access Statement, will ensure the proposed blocks do not result in adverse reflected glare or associated visibility issues.</p>
<p><i>h) buildings should be designed to minimise light pollution from internal and external lighting</i></p>	<p>The submitted Landscaping Statement demonstrates how the proposed external lighting will assist with defining</p>

	the edges and key routes through the Site, and the location and style of lighting columns chosen will ensure light pollution is minimised during the nighttime hours.
2) FUNCTIONAL IMPACT	
<i>a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants</i>	<p>The design of the buildings, including entrances, has focused on legibility and resident safety. All entrances are step free and comply with Part M building regulations.</p> <p>The central public realm is designed to be car-free, only permitting emergency vehicle access.</p>
<i>b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process</i>	<p>Servicing, deliveries and refuse collection will take place from on-street loading bays which have been incorporated into the design and layout of the proposed development from the outset.</p>
<i>c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas</i>	<p>The proposed development incorporates distinct Character Areas which define the activities likely to take place within each part of the Site. The Access Strategy is outlined in the Design and Access Statement and demonstrates how vehicular movement has been moved to the fringes of the scheme to create a distinct hierarchy between pedestrians and vehicles. This hierarchy allows the public realm to serve its primary function.</p>
<i>d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building</i>	<p>The Site is located 300m from Southall railway station which will benefit from the introduction of Crossrail which will further enhance connectivity to the Site. The Site is located within the Mayor's Southall Opportunity Area. The combination of a high level of accessibility and the Site's location means that a tall building is acceptable in principle.</p>
<i>e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area</i>	<p>The built environment surrounding the Site is currently undergoing a period of transition which a number of large scale developments coming forward. Various planning permissions have been approved over recent years around the train station which will significantly transform the area. Further details of these schemes are set out in Section 2.0 of this Statement.</p> <p>The proposals seek to provide 2,922.8 sq.m. of flexible commercial, employment and community floorspace across the development. It has been anticipated that this quantum of non-residential floorspace will support approximately 90 jobs.</p>
<i>f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings</i>	<p>An Aviation Impact Assessment has been prepared by PagerPower and is submitted with this application. The analysis demonstrates that the proposed development does not breach the Conical Surface of the OLS at Heathrow and therefore the height of the tallest tower is acceptable in this regard. Discussions have taken place</p>

	<p>with the safeguarding team at London Heathrow Airport and they have not raised any concerns with the proposals.</p> <p>Overall the assessment reveals no significant concerns with the height or design of the proposed development.</p>
3) ENVIRONMENTAL IMPACT	
<p><i>a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building</i></p>	<p>The relevant technical assessments to support these environmental impacts have been undertaken and the findings of these are presented in Section 7.0 of this Statement. The Assessments conclude that the design and layout of the proposed blocks will not result in adverse wind, daylight, sunlight or temperature conditions for residents and occupiers of the new buildings or existing residents and occupiers in the surrounding area.</p>
<p><i>b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions</i></p>	<p>The Air Quality Assessment is informed by dispersion modelling and concludes that the impacts on pollutant levels as a result of the operational phase of the proposed development is considered to be not significant at all sensitive locations within the vicinity of the Site. Therefore air quality issues are not considered a constraint to obtaining planning permission.</p>
<p><i>c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building</i></p>	<p>The Noise Impact Assessment confirms that the proposed development will result in minor exceedances of commercial noise due to adjacent commercial activities, however the use of alternative ventilation for a small number of additional facades will ensure that the necessary British Standards noise level criteria are met.</p> <p>The proposals will ensure that plant noise limits for any installed commercial plant are provided and a number of mitigation measures will be adopted to ensure an adequate level of protection from noise for both residents and occupiers of the Site. These mitigation measures include the use of alternative ventilation and marginally higher specification glazing.</p>
4) CUMULATIVE IMPACTS	
<p><i>a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.</i></p>	<p>The planning permission relating to the redevelopment of the Southall Men's Club (ref.166501FUL) has been considered in the context of the proposals, particularly in relation to landscaping proposals to ensure that materials and surfacing are coordinated. Nevertheless, as the development related to this permission is not a tall building, it need not be assessed cumulatively specifically against this element of the policy.</p>
Part D – Public access	
<p><i>Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.</i></p>	<p>Free to enter publicly accessible areas are provided within the flexible commercial, employment and community floorspace featured at ground and first floor levels. Given the residential nature of the proposals it is not considered</p>

	appropriate to provide public access to the top of the buildings.
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- 6.9** The Site comprises the majority of site allocation SOU8: The Green which is identified in Ealing’s Development Sites DPD (2013). The allocation supports the comprehensive redevelopment of the area and the proposed development will contribute to this renewal by delivering the following key benefits:
- regeneration and optimisation of an under-utilised and poor quality site;
 - provision of a high-quality residential development to meet the London-wide demand for housing;
 - provision of policy-compliant, high-quality affordable housing;
 - creation of jobs throughout the construction period and also provide employment opportunities for local people through the flexible commercial uses;
 - opportunity to reinvigorate the strong ethnic retail provision in the area; and
 - contribution towards a high-quality public realm which provides an active and well-defined street frontage which anchors The Green and creates stronger links between the Manor House Gardens and the Site.
- 6.10** The proposed development incorporates flexible commercial uses on the ground floor which will be used by the public. The layout of the ground floor has been designed to ensure active frontage and natural surveillance at street level.
- 6.11** The design of the buildings, which includes generous active frontages and enhanced public realm, will encourage pedestrians walking along The Green to enter the Site and will improve permeability in the wider area, particularly in relation to the Manor House and Gardens, and Southall train station. The commercial unit adjacent St Anselm’s Church will be visible when walking from Southall station and will encourage greater pedestrian footfall than is currently experienced.
- 6.12** At the local level, Ealing’s **Policy 7.7** in their Development Management DPD sets out the following design criteria for tall buildings.
- *accord with the spatial objectives of the Development Strategy in being located on specific sites within Acton, Ealing and Southall town centres, gateways to Park Royal and identified development sites.*
- 6.13** The Site is an identified development site, as demonstrated by site allocation SOU8 and also situated in Southall.
- *offer an outstanding quality of design.*
- 6.14** As demonstrated in the Design and Access Statement, the proposals adopt the highest standard of architecture and design.
- *make a positive and appropriate contribution to the local context and the broader area on which they impact.*
- 6.15** The proposals relate well to the emerging townscape area and have been designed to respond to the existing character and urban grain of the surrounding street scene. The flexible commercial units at ground floor will provide active frontages and associated landscaping improvements, resulting in an attractive public realm

which provides links to the Manor House and Gardens. Further details are set out in the submitted Design and Access Statement.

- 6.16** In light of the analysis above and the policy designations, we therefore consider that the scheme complies with **Policy 1.2 (h)** of the Ealing Development Strategy and **Policy 7.7** of the Ealing's Development Management DPD and therefore is suitable for tall buildings. This in turn means it is compliant with Policy D9 which puts the onus on the specific Borough to determine where tall buildings are acceptable. Provided that the buildings contribute positively to the urban environment and do not cause harm to existing heritage assets, which we consider that the scheme complies with, the suitability of the Site for tall buildings is acceptable. Finally, the Site is located within the Southall Opportunity Area and within Southall Town Centre, both of which are identified as areas of significant change and actively encourage regeneration and high density development.
- 6.17** In summary, the proposals comply with the Mayor's and Ealing's tall building policies. Indeed, we consider the height of the buildings which range between 2 and 19 storeys are suitable in the context of the surrounding area and the Site's location within an Opportunity Area (as defined in the London Plan). The proposed development will not have a significant impact on the local townscape nor will it be harmful from a visual impact perspective. This is demonstrated in further detail in the **Heritage and Townscape Assessment** that supports this application.

HISTORIC ENVIRONMENT

- 6.18** Section 72(1) of the Planning (Listed Buildings and Conservation Areas Act) 1990 states that with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 6.19** Section 66(1) of the Planning (Listed Buildings and Conservation Areas Act) 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the decision-maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historical interest which it possesses.
- 6.20** The NPPF mirrors the above statutory provisions. **Section 16** of the NPPF refers to 'Conserving and enhancing the historic environment' and sets out that proposals that preserve those elements of the setting of a heritage asset that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 6.21** **Paragraph 197** relates specifically to non-designated heritage assets and states that in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 6.22** **Policy HC1** (*Heritage conservation and growth*) of the London Plan states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

- 6.23** **Policy 7C** (*Heritage*) of Ealing's Development Management Plan states that development of heritage assets and their settings should be based on an analysis of their significance and the impact of proposals upon that significance. This also includes the enhancement or ability to better reveal the significance of assets.
- 6.24** Part C of **Policy 7C** states that the significance of heritage assets should be understood and conserved when applying sustainable and inclusive design principles and measures. Part D sets out that harm to any heritage asset should be avoided.
- 6.25** **Policy 2.18** (*Green Infrastructure: The Network of Open and Green Spaces*) of Ealing's Development Management document states that development should not compromise the visual openness or heritage value of open and green spaces particularly with regard to views within and across these areas. The impact of development upon views to and from open and green spaces is also a material consideration.
- 6.26** The Southall Manor House, on the eastern side of The Green, is Grade II* listed and the Southall Wall Memorial to the north of the Manor House is Grade II listed. A locally listed substation is also located on site, between St Anselm's Church and the Tudor Rose. Aside from these designations, we consider the Site is not sensitive with regard to heritage or townscape designations. The surrounding townscape comprises largely that of a commercial high street which is mixed in age, quality and style of architecture.
- 6.27** The highest point of the development is deliberately situated within the centre of the development and steps down towards the perimeter of the Site. The buildings have been designed to a high design quality and will seek to conserve and where possible enhance the setting of the listed Manor House.
- 6.28** The proposed development necessitates the demolition of the locally listed substation, which comprises a two storey, brown brick building with painted gables and steps to a first floor entrance. The submitted Heritage and Townscape Assessment explains that the substation has unattractive modern alterations and does not share any significant associations with persons or events of note. We consider that the substation has a relatively contained context, comprising a pedestrian route and a large car park, and therefore the setting makes no particular contribution to its significance.
- 6.29** Nevertheless, the **Heritage and Townscape Assessment** concludes there would be a low level of harm attached to its demolition, and this should be considered under paragraph 197 of the NPPF. Given the low level of significance of the building to be demolished, the limited area in which it will be experienced and the necessity of the works to deliver the redevelopment of the Site, the demolition is, on balance, considered to be acceptable.
- 6.30** No significant effects on heritage are expected to arise as a result of the development proposals and it is concluded that the proposed development would not cause harm to identified heritage assets through change to their settings. As such, in accordance with the NPPF, there is no requirement to weigh heritage impacts against public benefits.
- 6.31** Notwithstanding the view set out in the Heritage and Townscape Assessment that there would be no harm to designated heritage assets, should the decision-maker take a different view and conclude that there was harm, we are of the view that it would certainly be less than substantial harm and would be clearly outweighed by the significant planning benefits set out in **Section 9.0**.

6.32 The design and layout of the proposed development will assist with opening up views of the Manor House through the creation of active frontages leading through The Green towards a new area of public realm. This will also enhance permeability in the area by encouraging pedestrians to access the 'heart' of the Site through the Manor House Gardens to the east. As such this will contribute towards better revealing the significance of the Manor House, in accordance with Ealing's **Policy 7C**.

7.0 OTHER PLANNING CONSIDERATIONS

AMENITY

7.0 **Policy 7B** (*Design amenity*) of Ealing's Development Plan states that new development must achieve a high standard of amenity for users and for adjacent uses by ensuring:

- a) high-quality architecture;
- b) good levels of daylight and sunlight;
- c) good levels of privacy;
- d) coherent development of the site;
- e) appropriate levels of development on site;
- f) positive visual impact; and
- g) legibility and accessibility.

7.1 External treatments, fittings and materials must complement the building and context and must not impair the visual amenity of surrounding uses.

7.2 **Policy 7D** (*Open Space*) of Ealing's Development Management Plan sets out that all developments that increase demand for open space will be expected to make an appropriate contribution towards meeting this additional demand. Any development adjacent to or neighbouring existing open space should seek to enhance and not compromise the character of that open space or its function.

7.3 The proposed development provides residents with access to high-quality communal amenity space in the form of two podium level resident gardens. These are located to benefit from a south-facing orientation and incorporate three types of space: a planted garden and social space; a flexible open lawn area; and a defined play area.

7.4 The design of the development also facilitates a safe and easy connection across The Green to reach the Manor House and Gardens.

7.5 In terms of children's playspace, Ealing's policy standards require the provision of 10 sq.m. per child. The quantity of playspace has been calculated using the revised GLA Population Yield Calculator. It is not possible to accommodate all the play provision within the development, so the scheme focuses on delivering the 0-4 year range and a proportion of the 5-11 year age requirement. Notwithstanding this, Peabody's strategy is to provide challenging pieces of play that will appeal to slightly older children and also provide stimulation and challenge to younger children.

7.6 In addition to defined residential playspace located in the podium gardens of Blocks A and B, smaller incidental public playspace is located at ground level within the public realm adjacent to Block C. The total amount of on-site play amounts to:

- Block A (podium level) – 350 sq.m.
- Block B (podium level) – 404 sq.m.
- Block C (ground level) – 461 sq.m.

7.7 With regards to more formal playspace including facilities for older children (12+), some recreational and social areas are provided within the Central Boulevard such as table tennis tables. There is however a range of open space and MUGAs located within an 800m radius walk of the Site. Details of these play space areas are set out in the submitted **Landscaping Statement** and include:

- Manor House Gardens;
- Bixley Field;
- Emerald Square Playground;
- Spencer Strete Playground; and
- Southall Recreation Ground.

7.8 To mitigate any impact on these existing areas of play through increased usage from occupiers of the development, the Applicant is willing to propose a financial contribution to secure improvements to these spaces. The level of provision will be discussed further with the Council's officers.

AGENT OF CHANGE

7.9 **Policy D13** (*Agent of Change*) of the London Plan outlines that it is the responsibility of the developer to mitigate impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.

7.10 **Policy D13** also states that new noise and other nuisance-generating development close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.

7.11 A full suite of technical documentation is submitted with this application which demonstrates that the proposals comprise a high quality design and incorporate necessary mitigation measures to ensure there are no detrimental impacts on existing and proposed local amenity. Further details are set out in the remainder of **Section 7.0**.

7.12 The layout and configuration of the proposed development results in limited opportunities for conflict. The existing neighbouring commercial uses face away from the proposed development and are provided with separate access points. The proposals will therefore allow these adjacent uses to continue to operate independently and continue to grow without unreasonable restrictions being placed on them.

7.13 The adoption of a high quality design and appropriate mitigation measures (including mechanical ventilation, high specific glazing and balcony screening) will minimise both existing and potential nuisances. Therefore we consider the proposed development is suitable for the promotion of residential and commercial development and accords fully with the requirements of **Policy D13**.

TRANSPORT

7.14 **Section 9** of the NPPF refers to 'Promoting sustainable transport' and **Paragraph 108** sets out that in approving development it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users; and

- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

7.15 Paragraph 110 states that applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

7.16 Paragraph 122 of the NPPF sets out that planning policies and decisions should support development that makes efficient use of land by taking into account the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use.

7.17 Policy T1 (*Strategic approach to transport*) of the London Plan states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

7.18 The Site is located in a central location in close proximity to Southall railway station. It benefits from good access to public transport links and is in a sustainable location with a number of everyday services within walking and cycling distances. The introduction of Crossrail will also improve public transport accessibility and thus reduce the need for parking.

7.19 A **Transport Assessment** has been prepared by TPP and submitted with this application. It quantifies the impact of the development on the highway network surrounding the Site.

7.20 The Assessment concludes that the development is not anticipated to result in a significant increase in traffic movements on the local highway network surrounding the Site. Furthermore, over time, the impact on local traffic conditions is expected to reduce as car ownership levels associated with the users of the Site are expected to decrease. This is due to the following reasons:

- the improvement of the pedestrian and cycle permeability throughout the Site and the wider area;
- the commencement of Crossrail services which will provide more services towards key destinations throughout London;
- the presence of car club services in the local area; and
- the measures provided within the Travel Plan which aim at encouraging sustainable transport.

7.21 With regards to the last point, a **Framework Travel Plan** is also submitted with this application. This intends to encourage residents to choose more sustainable modes of transport. It sets out the following measures to achieve this:

- Reducing the need to travel – influencing the volume and timing of travel activity to lessen its impact;
- Making better use of the car – ensuring car parking provision is based only on need;
- Maintaining and encouraging further use of sustainable modes of travel – reducing the need for car usage and encouraging walking, cycling and public transport;
- Reducing emissions – reducing the environmental impact of the sites travel demands; and
- Raising awareness – promotion of travel choices.

7.22 As part of the proposals, one of the parking spaces within the public car park will be leased to a car club operator. This will provide the users of the site, as well as residents and employees in the surrounding area, with an alternative to the use of their private vehicle. If demand for the car club vehicle is high in the future, it will be possible for a second bay within the public car park to be converted into a car club bay to accommodate the additional demand. We are also aware of two existing car club spaces located within the surrounding area and operated by Zipcar and Enterprise.

7.23 The provision of car clubs seek to further minimise the level of car movements from the Site and encourage sustainable modes of transport such as walking and cycling. Therefore, with sufficient mitigation the development will not have a significant impact on traffic movements in the vicinity of the Site.

7.24 In terms of car parking, London Plan **Policy T6.1** (*Residential parking*) sets out the maximum parking standards for residential development. For an area of Outer London Opportunity Area the standard is up to 0.5 spaces per dwelling. **Policy 6.13** of Ealing’s Development Management Plan re-iterates the policy standards outlined in the London Plan.

7.25 London Plan **Policy T6.1** states that disabled persons parking should be provided for all new residential developments. Residential development proposals delivering ten or more units must, as a minimum ensure that for 3% of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset. Ealing Local **Policy 6.13** sets out the local variation in parking standards for the Borough, which requires a 10% provision of total disabled off-street parking.

7.26 London Plan **Policy T6.1** also states that all residential car parking spaces must provide infrastructure for electric or ultra-low emission vehicles. At least 20% of spaces should have active charging facilities, with passive provision for all remaining spaces.

7.27 The Site currently comprises a surface level car park providing approximately 150 public parking spaces. The scheme proposes a car parking provision as follows:

Table 7.1 Proposed car parking provision

	Public Parking	Residential Parking
Block A	-	25 spaces
Block B	28 spaces	31 spaces

Block C	-	4 spaces
St Anselm's Church	52 spaces	-
Street parking	10 spaces	-
Total	90 spaces	60 spaces

- 7.28** The proposals seek to re-provide a proportion, 90 spaces, of the existing public car parking, which is supported by the Council's highways team. A total residential car parking provision of 60 spaces is proposed which is within the maximum parking standards set by the London Plan. Of the 60 residential spaces, 35 spaces are to be provided as accessible spaces and of the 90 public spaces, 10 spaces are provided as accessible.
- 7.29** 20% of the residential parking spaces will have active provision for electric charging, whilst the remaining 80% of the residential parking will have passive provision. 10% of the public parking spaces will have an active provision, and this is an increase from the 3 existing EV charging points provided on Site to 9 EV charging points proposed as part of the development scheme. Therefore the proposed development will also ensure EV parking is provided in accordance with the London Plan standards.
- 7.30** As such, we consider that the quantum of proposed car parking is acceptable.
- 7.31** With regard to cycle parking, there would be a total of 1,006 residential cycle spaces which will be provided in the mezzanine level of Block A, the ground floor and first floor of Block B and the ground floor of Block C. This includes space for 46 oversized bikes.
- 7.32** For the commercial elements of the scheme, there will be 24 long-stay cycle spaces.
- 7.33** For the public realm, there will be 44 spaces across cycle hoops on the Site providing opportunities for short stay cycle users. These will be located near buildings' entrances and will be overlooked.
- 7.34** **Policy T7** (Deliveries, servicing and construction) of the London Plan states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.
- 7.35** A **Delivery and Servicing Management Plan** has been prepared by TPP and submitted with this application. Servicing, deliveries and refuse collection will take place from on-street loading bays. The existing industrial estate, located to the west of the Site will continue to be serviced as per the existing situation.
- 7.36** In accordance with **Policy T7**, the proposed servicing arrangements have been designed to ensure all delivery and servicing activities will within the Site which will ensure that traffic flows on the surrounding public highway network are unaffected.

PUBLIC REALM AND LANDSCAPING

- 7.37** **Policy D8** (*Public Realm*) of the London Plan sets out that all development proposals should encourage and explore opportunities to create new public realm where appropriate. They should ensure that public realm is

well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable.

- 7.38** **Policy D8** also explains that development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way. Proposals should maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car and excessive on-street parking, which can obstruct people's safe enjoyment of the space.
- 7.39** With regards to the existing use of the Site, the public realm is extremely limited as the Site is dominated by either buildings or the large surface level public car park in the centre of the Site. It lacks soft landscaping and natural surveillance. It is also not permeable with pedestrians having to walk a convoluted route from the car park south down Dominion Road to access the shopping frontage of The Green and Southall Railway Station, rather being able to walk directly east or north.
- 7.40** A **Landscaping Statement** and set of drawings have been prepared by Turkington Martin and are submitted with this application. They demonstrate that the proposed development will provide a significant new element of public realm which will positively respond to the new active ground floor uses and facilitate enhanced pedestrian connectivity within the wider area of The Green.
- 7.41** The proposed scheme responds positively to **Policy D8** by making public realm a key feature of the development. Indeed, new east-west and north-south pedestrianised streets are proposed that connect the Site better with the shopping frontage and the railway station. Not only does this benefit the future occupiers of the Site but it also improves connections and linkages for pedestrians travelling from Featherstone Road and beyond to such places as it opens up the Site. As such, it will promote more active travel.
- 7.42** Specific features of this new public realm provision include a potential pop-up market square, places to sit and eat, play space and green areas of planting. All of these features will be built to the highest quality, ensuring accordance with London Plan **Policy D8**.
- 7.43** As set out in the **Design and Access Statement**, the public realm is separated into a number of character areas with the area between Block A and Block B known as the "Central Boulevard". These pedestrianised spaces are overlooked by active commercial units either side and residential balconies above and contain seating and opportunities for informal play around a landscaped setting. The public realm also provides a visual link to the listed Manor House and enhances the appreciation of its setting. We therefore conclude that the scheme is compliant against **Policy D8**.
- 7.44** In terms of supporting the night-time economy, London Plan **Policy HC6** calls on development plan policies to plan positively for the night-time economy. This includes adopting measures such as improving access, inclusion and safety, making the public realm welcoming, and diversifying the range of night-time activities.
- 7.45** As noted above, the proposed development seeks to deliver various flexible Use Class E, F1 and F2 spaces that could respond positively to both the day-time and night-time economy. The units have been designed intentionally to be flexible with moveable walls so that they can respond to market demand and noise insulation has been considered at an early stage to minimise conflict between commercial and residential uses. The

public realm will include sensitive street lighting to ensure that the streets remain well-lit whilst glazed ground floor frontages and external balconies will ensure active frontage. Alongside such active frontage and high quality public realm, the scheme will be accessible, inclusive, safe and welcoming for users during all parts of the day.

- 7.46** **Policy G5** (*Urban Greening*) of the London Plan states that major development should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.
- 7.47** The **Landscaping Statement** explains that the Urban Greening Factor for the proposed development has been calculated using the GLA guidelines, and demonstrates that the proposed development is positively contributing to the 'greening' of the existing site through the incorporation of high quality amenity space for residents, new areas of public realm, the implementation of measures to enhance biodiversity (such as bat/brid boxes, shrub and tree planting) and the use of SuDS techniques.
- 7.48** The proposed development achieves a UGF score of 0.38, which is achieved through the incorporation of green roofs, shrub and tree planting, a green wall and permeable surfaces.
- 7.49** The Site boundary incorporates existing roads along Featherstone Terrace and Dominion Terrace which naturally reduces the potential for greening on the Site and distorts the UGF calculation. These roads are depended on by third parties which fall outside of the red line boundary of this application, and therefore the development is unable to amend these to improve the UGF score.
- 7.50** Notwithstanding these constraints identified, we consider that the UGF performance is still strong and is further reinforced by securing a biodiversity net gain across the Site, as set out in the submitted **Framework Biodiversity Enhancement Strategy**.
- 7.51** Therefore in accordance with **Policy G5**, the proposed development will contribute to the greening of London and as illustrated in the **Landscaping Statement**, urban greening is a fundamental element of the site and building design and the proposals present a vast improvement to the quality of the natural environment.

ARCHAEOLOGY

- 7.52** **Policy HC1** (*Heritage conservation and growth*) of the London Plan states that new development should make provision for the protection of archaeological resources.
- 7.53** An **Historic Environmental Assessment** has been prepared by MOLA and is submitted with this application. The Assessment concludes that no remains of more than low significance are anticipated to be found on the Site. The earliest known development on the Site is the construction of buildings in the eastern half of the site in the mid-19th century. These were demolished and then replaced by buildings that remain today. Such remains would be of low significance.

CONTAMINATION

- 7.54** Paragraph 178 of the NPPF states that planning policies and decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.
- 7.55** Policy 5.21 (*Contaminated Land*) of Ealing's Development Management Plan states that contaminated land must be treated in a manner appropriate for its proposed use. Evidence of the appropriateness of the measures to be taken must be submitted as part of the planning application.
- 7.56** A Phase 1 Geo-environmental Assessment has been undertaken by Land Science and is submitted with this application. It sets out that the risk of soil contamination on Site is considered moderate, whilst the likelihood of ground gas contamination is unlikely and for groundwater contamination the risk is considered very low. This applies to both the Site and immediate wider environment.
- 7.57** The assessment recommends that prior to demolition a full and comprehensive asbestos survey of all structures should be carried out. After demolition and site clearance additional, a phase II ground investigation would be recommended and any areas of concern identified in the preliminary investigation. The scope of these ground investigation works can be agreed with the Local Planning Authority and other relevant stakeholders prior to carrying out these works.

ENERGY AND SUSTAINABILITY

- 7.58** Section 14 of the NPPF relates to 'Meeting the challenge of climate change, flooding and coastal change' and states that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 7.59** Paragraph 150 states that new development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design.
- 7.60** Policy SI 2 (*Minimising greenhouse gas emissions*) of the London Plan states that major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
- 1) be lean: use less energy and manage demand during operation.
 - 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly.
 - 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.
- 7.61** Policy SI2 states that a minimum on-site reduction of at least 35% beyond building regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures.

- 7.62** **Policy 5.2** (*Minimising Carbon Dioxide Emissions*) of the Ealing Development Management Plan states that major non-residential developments are required to achieve a minimum 'Very Good' rating under the most up-to-date BREEAM or equivalent scheme and make reasonable endeavours to achieve Excellent and Outstanding.
- 7.63** **Policy 5.11** (*Green roofs and development site environs*) of the Ealing Development Management Plan sets out that green roofs are strongly encouraged on all development where it would be appropriate in design, contextual and conservation terms.
- 7.64** An **Energy Strategy** has been prepared by Elementa and is submitted with this application. A site-wide fossil fuel free heating and hot water system is proposed, with zero emissions on-site from the outset. This accords with the London Plan Heating Hierarchy and is in line with the Mayor's aims to make London a zero-carbon city by 2050.
- 7.65** For the residential element, an ambient loop will provide hot water and space heating. For the non-residential element, designed as shell and core, the same system type will provide heating and cooling for the flexible commercial uses.
- 7.66** It sets out that the proposed development achieves a 63% carbon emissions reduction against the building regulation minimum requirements for the overall development. This is broken down to a 61% reduction for the residential element of the development and 73% for the non-residential element. This demonstrates accordance with **Policy S12**.
- 7.67** The proposed development incorporates PV panels on the roof of Blocks A, B and C, which offer a further 6% of carbon savings. In accordance with **Policy 5.11**, the Blocks also incorporate green roofs.
- 7.68** The Energy Strategy outlines that the proposals will achieve a BREEAM rating of 'Very Good' for the non-residential part of the development, in accordance with Ealing's **Policy 5.2**.
- 7.69** A **Sustainability Statement** has also been prepared by Elementa and is submitted with this application. It demonstrates how the proposed development seeks to become a truly sustainable mixed-used development. The proposals are expected to achieve an overall 63% reduction in operational CO₂ emissions, which is over and above the policy requirement of a 35% reduction.
- 7.70** This significant carbon dioxide reduction will be achieved using the following strategies:
- the scheme will use passive design measures to minimise energy use through low U-values for the external building envelope, high levels of air tightness and mechanical ventilation with heat recovery;
 - a site-wide fossil fuel free heating and hot water system is proposed, with zero emissions from combustion on-site from the outset;
 - ground source ambient loop with heat pumps will provide heating through the residential components of the development;
 - 76% of dwellings will be dual aspect, with no single aspect north facing units proposed, thus maximising passive solar heating; and
 - overheating risks have been mitigated by optimizing window sizes, solar control glazing and cross ventilation without the use of active cooling.

- 7.71** In terms of waste production, the proposed development will support London's transition to a low carbon circular economy by implementing different circular economy principles and strategies relating to materials, waste, energy and water.
- 7.72** **Policy SI7** (*Reducing waste and supporting the Circular Economy*) of the London Plan sets out that development should seek to promote a more circular economy that improves resource efficiency and innovation, which keep products and materials at their highest use for as long as possible. Policy SI7 encourages waste minimisation and seeks to ensure that there is zero biodegradable or recyclable waste to landfill by 2026.
- 7.73** A **Circular Economy Statement** has been prepared by Elementa and submitted with this application. It sets out how the proposed development will ensure that the quantity of new material materials will be reduced and the opportunity to use recyclable materials has been maximised.
- 7.74** Initial waste management strategies and targets have been outlined, which will be implemented once a contractor has been appointed, and these will be fed into a Site Waste Management Plan. The Assessment confirms that materials from remaining site clearance and demolition of the car park and other external works are to be crushed and used/recycled on site.
- 7.75** Part F of **Policy SI 2** states that proposals referable to the Mayor should calculate whole-life carbon emissions through a nationally recognized Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.
- 7.76** A **Whole Life Cycle Carbon Assessment** has also been prepared by Elementa and undertaken to assess the embodied carbon of the development. The embodied carbon assessment for this study has been done in line with the 'Whole life-cycle carbon assessment guidance', GLA consultation draft (October 2020) and RICS guidance 'Whole life carbon assessment for the built environment' (November 2017) over a period of 60 years and take into account the following building elements: substructure, superstructure, internal finishes, and building services. Embodied carbon calculations for the residential and commercial part of the proposed development have been calculated separately.
- 7.77** Initial carbon impact mitigation measures had been taken prior to the assessment, and further measures are planned in later design stages. It is recommended that further WLC assessments be carried out as the design continues to develop.

NOISE AND VIBRATION

- 7.78** **Paragraph 180** of the NPPF states that planning policies and decisions should ensure that new development is appropriate for its location and in doing so should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development, and avoid noise giving rise to significant adverse impacts on health and the quality of life.
- 7.79** **Policy D12** (*Agent of Change*) of the London Plan states that development proposals should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area. Development proposals should also

separate new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.

7.80 **Policy D14** (*Noise*) of the London Plan states that in order to reduce, manage and mitigate noise to improve health and quality of life, development proposals should manage noise by:

- avoiding significant adverse noise impacts on health and quality of life;
- mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
- where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles.

7.81 **Policy 7.15** (*Reducing and managing noise*) of the Local Plan states that development proposals should seek to manage noise by avoiding significant noise impacts on health and quality of life as a result of new development. Development should be mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development.

7.82 A **Noise Impact Assessment** has been prepared by REC and is submitted with this application. It confirms that the key noise sources impacting upon the development are road traffic, the nearby railway and commercial sound. Noise surveys were conducted pre-Covid over three weekdays and two weekend days to ensure the typical noise environment was captured.

7.83 Minor exceedances of commercial noise due to adjacent commercial activities are noted, and use of alternative ventilation for a small number of additional facades will ensure that the necessary British Standards noise level criteria are met.

7.84 The proposals will ensure that plant noise limits for any installed commercial plant are provided. The Assessment also recommends the following mitigation measures to ensure an adequate level of protection from noise:

- alternative ventilation should be fitted to all specified habitable rooms as an alternative to opening windows;
- marginally higher specification glazing should be used where specified; and
- mitigation for external amenity should be identified and conditioned for specified balconies.

7.85 Subject to incorporation of the above identified mitigation measures, REC consider that in principle, the Site is suitable for the promotion of residential and commercial development and will manage noise in accordance with the requirements of Ealing **Policy 7.15** and London Plan **Policy D12** and **D14**.

ECOLOGY

- 7.86** Paragraph 170 of the NPPF sets out that planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 7.87** Policy G6 (*Biodiversity and access to nature*) of the London Plan sets out that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- 7.88** A **Preliminary Ecological Appraisal** has been prepared by Middlemarch Environmental and is submitted with this application. The Appraisal revealed no European statutory sites within 5km of the survey area, no UK statutory sites and no ancient woodlands within 2km, and nine non-statutory sites within 1km. The Site is not located within 10km of a statutory site designated for bats, however it does fall within a SSSI Impact Risk Zone.
- 7.89** The desk study provided records of notable and protected species including bats, hedgehog, badger, notable birds, notable invertebrates and notable plants. One record of hedgehog within 1km of the survey area was logged, however no records or evidence of badgers was found.
- 7.90** The development proposals have been designed to allow for the retention of existing mature scattered trees. Where retention is not possible, appropriate replacement planting has been incorporated into the soft landscaping scheme prepared by Turkington Martin. Vegetation and building clearance will be undertaken outside the bird nesting season.
- 7.91** A **Preliminary Bat Roost Assessment and Dusk Emergence and Dawn Re-entry Bat Surveys** have been undertaken. These assessments identified several areas as having high and low potential to support roosting bats, however no evidence of roosting bats was identified within the buildings or trees during the survey. The assessments identified several potential features such as lifted or missing roof tiles and lifted lead flashing which could be utilised by roosting bats in several of the buildings on site. The Survey was reviewed and updated in March 2021.
- 7.92** The proposed development seeks to limit the impact of light pollution on bats through the careful use of lighting in critical areas only and at a low level with minimum spillage. In line with the NPPF, bat boxes will be installed to provide roosting habitat for species such as pipistrelle and the planting of species which attract night flying insects will be encouraged as this will be of value to foraging bats.
- 7.93** In accordance with **Chapter 15** of the NPPF, biodiversity enhancement measures will be incorporated into the landscaping of the proposed development to work towards delivering net gains for biodiversity. A **Framework Biodiversity Enhancement Strategy** has been prepared by Middlemarch. It outlines the potential habitat creation and species specific and management practices in order to enhance the value of the site to biodiversity and demonstrate opportunities to achieve 'net-gain' biodiversity. The strategy has highlighted that where feasible, existing scattered trees will be retained and enhanced as part of the proposed re-development of the site. Where this is not achievable, replacement habitat is to be provided of equivalent or greater distinctiveness.

7.94 The proposed development is anticipated to make the following contributions to national and local biodiversity targets:

- Creation of extensive green roofs;
- A range of native and wildlife attractive species will be planted at the Site;
- The proposed development will create habitat for bats and birds through the installation of boxes;
- The proposed development will create habitat for a variety of invertebrate species; and
- The development will be designed and managed to maximise its benefit to biodiversity, by ensuring the site offers opportunities for pollinators all year round and minimising the impact of artificial lighting wherever possible.

7.95 The Strategy confirms that the proposed development is likely to achieve a significant net increase in the biodiversity value of the site, notably a 380% uplift, which is considered to be in keeping with the key principles of the NPPF and relevant local planning policy.

7.96 Adopting the mitigation measures suggested above, Middlemarch consider that the proposed development is acceptable from an ecological perspective and accords with the requirements of the NPPF and adopted London Plan policies.

AIR QUALITY

7.97 **Policy SI1** (*Improving air quality*) of the London Plan states that development proposals must be at least air quality neutral. Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures.

7.98 An **Air Quality Assessment** has been prepared by Ensafe Consultants and is submitted with this application. In terms of air quality impacts during the construction phase, it is considered that the use of good practice control measures will provide suitable mitigation for a development of this size and nature and will reduce potential impacts to an acceptable level.

7.99 Dispersion modelling indicated that pollutant levels across the Site were below the relevant air quality standards and as such the location is considered suitable for the proposed end-use without the inclusion of protective mitigation measures. The assessment also concluded that impacts on pollutant levels as a result of operational phase pollutant emissions are predicted to be not significant at all sensitive locations in the vicinity of the Site.

7.100 The London Plan states that new developments must be considered Air Quality Neutral. Pollutant emissions associated with anticipated road traffic generation from the development were compared to relevant benchmarks. This indicated building emissions from the proposals were below the benchmarks and as such, no further action is required to address development emissions.

7.101 Therefore based on the results of the Assessment, there are not considered to be any air quality issues created as a result of the proposed development and the scheme accords with London Plan policy requirements.

DAYLIGHT AND SUNLIGHT

- 7.102 Policy D6** (*Housing quality and standards*) of the London Plan states 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.
- 7.103** Both external and internal **Daylight and Sunlight Assessments** have been prepared by Avison Young and they are submitted with this application. The Assessments identify adverse impacts to some of the neighbouring properties which present challenges due to proximity, orientation and in some cases inherent architectural design features. Whilst a number of breaches of the BRE Guidelines are expected, in overall terms the levels of compliance and retained amenity is considered to be reasonable given the urban location.
- 7.104** The analysis demonstrates that the proposed development has been reasonably optimised for daylight and sunlight amenity as the majority of sensitive receptors experience negligible or minor adverse effects, with only one surrounding property out of 41 considered to experience a moderate to major adverse effect. On balance, Avison Young consider this is a very good result given the scale of the proposals, the urban context and the number of neighbouring sensitive receptors.
- 7.105** In terms of internal assessment, it is demonstrated that the proposed development has been reasonably optimised for daylight with 89% of all habitable spaces meeting the minimum Average Daylight Factor (ADF) for the respective room type. Again this represents a high overall daylight compliance level for a development of this size in an urban context and is better or broadly comparable with other residential typologies within this area and of a similar nature across London.
- 7.106** With regard to sunlight, it should be appreciated that the Site's existing layout imposes orientation constraints which are not possible to overcome and therefore it has not been possible to fully meet the BRE Guidelines. However, the scheme has been carefully designed to avoid single aspect, north facing units in order to maximise the number of sunlit dwellings. 49% of the windows assessed will meet or exceed the BRE Guidelines criteria whilst 64% meet or exceed the criteria for winter sunlight. Again this is broadly comparable with other schemes of a similar typology within the area and across London.
- 7.107** Therefore based on the above, we consider that the proposed development is acceptable in terms of daylight, sunlight and overshadowing and complies with London Plan policy requirements.

FLOOD RISK

- 7.108 Paragraph 163** of the NPPF sets out that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere and where appropriate applications should be supported by a site-specific flood risk assessment.
- 7.109 Policy 5.12** (*Flood Risk Management*) of Ealing's development Management Plan states that all development, including that on land that is not part of a defined floodplain, must ensure that it is not vulnerable to surface water, sewer and groundwater flooding.
- 7.110 Policy SI12** (*Flood Risk Management*) of the London Plan states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed.

7.111 A combined **Flood Risk Assessment and SUDS Assessment and Drainage Strategy Report** has been prepared by Price & Myers and is submitted with this application. The Site is located in Flood Zone 1 and is not at risk of flooding from watercourses. Information from the Environment Agency also shows that the Site is at low risk of flooding from surface water, sewers, groundwater and reservoirs.

7.112 The assessment concludes that the Site has an acceptable flood risk within the terms and requirements set out under the NPPF.

SUSTAINABLE DRAINAGE

7.113 **Paragraph 165** of the NPPF states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- a) take account of advice from the lead local flood authority;
- b) have appropriate proposed minimum operational standards;
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
- d) where possible, provide multifunctional benefits.

7.114 **Policy SI13** (*Sustainable drainage*) of the London Plan states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy:

- 1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation);
- 2) rainwater infiltration to ground at or close to source;
- 3) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens);
- 4) rainwater discharge direct to a watercourse (unless not appropriate);
- 5) controlled rainwater discharge to a surface water sewer or drain; and
- 6) controlled rainwater discharge to a combined sewer.

7.115 The submitted **Flood Risk Assessment and Sustainable Drainage Strategy Report** prepared by Price & Myers states that attenuation to lowest feasible run-off rates, as close to Greenfield as possible, will be implemented. This will constitute a substantial reduction in surface water flow rates from the Site and a significant degree of betterment when compared to the existing unrestricted discharge rates from the Site, therefore reducing flood risk on and off site.

7.116 Price & Myers anticipate that foul water and attenuated surface water drainage from the Site will connect to the existing sewers along Featherstone Terrace / Featherstone Road / The Green.

7.117 The main proposed surface water SUDS strategy will be attenuation in below ground modular tanks, along with permeable paving, tree pits and other SUDS components where applicable and feasible. The **Ealing SUDS Proforma** has also been completed and is submitted as part of this application.

- 7.118** Price & Myers consider that the proposed development is feasible to implement a rainwater harvesting system, and the feasibility and suitability of rainwater harvesting will be assessed as part of the detailed design process of the buildings.
- 7.119** Soil infiltration testing will be carried out on site as part of further site investigation works, but given that the existing geology on site is clay, Price & Myers consider that it is anticipated to have very poor infiltration capacity. The use of soakaways will then be assessed once soil infiltration has been carried out.
- 7.120** Tree pits have been designed to take surface water run-off from localised paved areas thereby reducing the peak run-off rate to the final sewers.
- 7.121** It is proposed to incorporate green roofs, which will provide benefits in terms of biodiversity, attenuation and reduction in peak run-off rates.
- 7.122** It is envisaged that some of the site drainage will be offered for adoption to Thames Water subject to further discussions. However, the majority of the SUDS will be maintained by the site owner and will form part of the overall maintenance regime for the site.
- 7.123** Therefore the proposed SUDS strategy will ensure the proposed development complies with NPPF and London Plan policy requirements.

ARBORICULTURE

- 7.124** **Policy G7** (*Trees and Woodland*) of the London Plan sets out that development proposals should ensure that, wherever possible, existing trees of value are retained.
- 7.125** **Policy 5.10** (*Urban Greening*) of Ealing's Development Management Plan states that development proposals should replace existing trees and plantings on the basis of no net loss of amenity.
- 7.126** A **Preliminary Arboricultural Assessment** and an **Arboricultural Impact Assessment** have been prepared by Middlemarch Environmental and are submitted with this application. They demonstrate that the proposed development requires the removal of 17 trees and three groups of trees. 12 of these trees and one group are of suitable age and condition that they may warrant translocation to another area of the site or off site to prevent their loss. One tree was considered to be unsuitable for long-term retention and the removal of this tree would be required irrespective of the proposed development due to its poor condition. Three trees were of moderate retention value and the remaining trees and groups were considered to be of low retention value.
- 7.127** The proposed landscaping scheme for the Site includes the planting of numerous trees across the Site which, with time, will mitigate for any loss in amenity value resulting from the proposed tree removal. Four existing street trees will be retained and a breakdown of the proposed tree planting is as follows:
- Streets & footways – 22 trees
 - Car parks – 36 trees
 - Shared streets – 26 trees
 - Pedestrian areas – 36 trees
 - Raised communal garden (Block A) – 35 trees
 - Raised communal garden (Block B) – 60 trees

- 7.128** The above therefore results in the planting of 215 new trees, which is considered a further benefit of the proposed development.
- 7.129** Middlemarch Environmental consider that the proposed redevelopment of the Site will not have a significant impact upon the visual amenity of the local area. New tree planting as part of the proposed landscaping scheme will, with time, mitigate any loss to visual amenity resulting from the proposed tree removal and has the potential to result in a net gain of amenity value for the site in the long term.
- 7.130** To minimise the potential for harm to occur to the root systems and canopies of retained trees during development it will be necessary to implement construction exclusion zones throughout the site. This requirement is likely to form part of an appropriately-worded planning condition.

WIND

- 7.131** Part J of **Policy D8** (*Public Realm*) of the London Plan states that development proposals should ensure that appropriate shade, shelter, seating and where possible areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place.
- 7.132** A **Pedestrian-Level Wind Microclimate Assessment** has been prepared by RWDI and is submitted with this application. The Assessment is based on a Computational Fluid Dynamics (“CFD”) model and demonstrates that wind conditions with the proposed development in situ would range from suitable for sitting to strolling use during the windiest season. During the summer season courtyard amenity spaces would have sitting wind conditions, suitable for the intended use. The majority of balconies would also have the desired standing or calmer wind conditions during the summer season, however a minority of balconies are expected to have occasional strong winds exceedances. These balconies can be adequately mitigated using a 1.5m solid or 50% porous balustrade.
- 7.133** In cumulative terms, the surrounding developments will have no significant impact on the wind conditions on the Site due to their distance from the Site and also their location in non-prevailing wind directions.
- 7.134** The assessment concludes, overall, that with the suggested mitigation on balconies implements, all areas in and around the proposed development would be suitable and safe for the intended use. The proposals therefore accord with the London Plan policy requirements.

AVIATION SAFEGUARDING

- 7.135** An **Aviation Impact Assessment** has been prepared by PagerPower and is submitted with this application. The assessment identified the key aviation risks as the potential impact upon the Secondary Surveillance Radar (“SSR”) at London Heathrow Airport as well as the potential infringement of the Obstacle Limitation Surfaces (“OLS”) at Heathrow.
- 7.136** The analysis demonstrates that the proposed development does not breach the Conical Surface of the OLS at Heathrow and therefore the height of the tallest tower is acceptable in this regard.

- 7.137 The analysis also shows that the proposed development will not be significantly screened by existing buildings along the line of sight path.
- 7.138 Discussions have taken place with the safeguarding team at London Heathrow Airport and they have not raised any concerns with the proposals. PagerPower have also spoken with NATS, who safeguard the Heathrow Airport radar, which revealed that mitigation is likely to be required in the form of a technical fix to the radar implemented by NATS. This solution has been implemented for many developments of this type in the vicinity of SSR.
- 7.139 Consultation has also taken place with the MoD in relation to RAF Northolt, which is situated approximately four miles to the north-west of the Site. The MoD raised no objection to the proposed development.
- 7.140 Overall the assessment reveals no significant concerns with the height or design of the proposed development.

FIRE STRATEGY

- 7.141 **Policy D12 (Fire Safety)** of the London Plan states that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:
- 1) are designed to incorporate appropriate features which reduce the risk to life and of serious injury in the event of a fire; including appropriate fire alarm systems, passive and active fire safety measures;
 - 2) are constructed in an appropriate way to minimise the risk of fire spread;
 - 3) provide suitable and convenient means of escape, and associated evacuation strategy for all building users;
 - 4) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in; and
 - 5) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.
- 7.142 Part B of this policy states that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor.
- 7.143 A **Fire Strategy Report** has been prepared by BWC and is submitted with this application. The document covers means of escape, fire spread and control, construction, fire service access and fire safety management.
- 7.144 The Report demonstrates that the proposed development will achieve a level of fire safety compliant with the functional requirements of the Building Regulations and also accords with the requirements of London Plan policy.

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

- 7.145 A **Draft Construction Environmental Management Plan** (CEMP) has been prepared by Silver and submitted with this application. The CEMP details the strategy for the management of site-based construction works and also considers the mitigation of any wider reaching impact to the community as a whole. It outlines how the proposed development will be brought forward in three distinct phases.

- 7.146** The main construction activities will comprise utilities disconnection and diversion works, site clearance and levelling, and the construction of three blocks comprising reinforced concrete framed buildings for residential use in three phases.
- 7.147** The full extent of site operations will comply with London Borough of Ealing's Environmental Code of Construction Practice.
- 7.148** A more detailed Demolition and Construction Plan will be developed by the contractor undertaking the works, once appointed and this can be secured by way of a planning condition.

8.0 PLANNING OBLIGATIONS

PLANNING OBLIGATIONS

8.0 Under Section 106 of the Town and Country Planning Act 1990 (as amended) local planning authorities have the power to enter into planning obligations with any person interested in their land for the purpose of restricting or regulating the development or use of the land. In accordance with Regulation 122 of the CIL Regulations 2010 (as amended), a planning obligation must be:

- a) necessary to make the proposed development acceptable in planning terms;
- b) directly related to the proposed development; and
- c) fairly and reasonably related in scale and kind to the proposed development.

8.1 **Paragraph 54** of the NPPF states that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

8.2 **Paragraph 55** states that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.

8.3 Ealing Borough Council has a draft SPD relating to 'Legal Agreements, Planning Obligations and Planning Gain' (known as SPD 9) which provides guidance on negotiating planning obligations.

8.4 In accordance with adopted policy and the tests set out in the NPPF it is anticipated that obligations arising out of this Application may include the following Heads of Terms:

- affordable Housing;
- carbon offset payment;
- initiatives towards local employment and enterprise;
- off-site public realm improvements including to local play space;
- highways improvements secured under Section 278; and
- administration charges and legal costs.

COMMUNITY INFRASTRUCTURE LEVY

8.5 The Mayoral Community Infrastructure Levy (MCIL) applies in all London boroughs to developments which propose new build floorspace above 100 sq.m. or where a new dwelling is created. From 1 April 2019, MCIL2 came into effect which is being used to contribute to the funding of Crossrail.

8.6 The MCIL2 rate for the London Borough of Ealing is £60 per sq.m.

8.7 In Ealing, a draft CIL charging schedule went to examination in 2016 and the Inspector's report subsequently confirmed it was sound. However, CIL has not yet been formally adopted by the Borough.

8.8 A phased full planning permission is sought as the development will be constructed in three phases, albeit with phases running more or less concurrently given the close linkages and interdependencies between them. Block A will be delivered first, followed by Block B and lastly Block C. It is anticipated that a phasing condition will be attached to any future planning permission for which the scheme will be constructed in accordance with once submitted and discharged. This will mean that CIL payments will be phased in accordance with the approved phasing plan.

9.0 SUMMARY AND CONCLUSIONS

- 9.0** This Statement has been prepared by Montagu Evans LLP on behalf of the Applicant to support an application for planning permission at The Green, Southall, UB2.
- 9.1** The proposed development will comprise 564 residential dwellings (Use Class C3) and 2,922,8 sq.m. of flexible commercial, employment and community floorspace (Use Classes E, F1 & F2). The proposals will form three urban blocks which will rise between two to 19 storeys (ground inclusive). A total of 60 car parking spaces will be allocated to the residential development and 90 public car parking spaces will be re-provided on the Site.
- 9.2** This Statement provides an analysis of the proposed scheme in light of adopted planning policy and identifies any key considerations material to the determination of the application. The scheme has been developed in close consultation with officers at Ealing, the GLA, Historic England and local residents, businesses and amenity groups.
- 9.3** The proposals accord with Site Allocation SOU8 in that they provide a high-quality mixed-use development that meet local strategic objectives of delivering housing (including affordable housing) to meet ambitious housing targets and deliver opportunities for employment that will increase the quantum of jobs across the Site.
- 9.4** From a housing perspective, 564 new units are proposed, 50% of which are affordable, meeting a pressing need for such. All units will have private amenity space and access to landscaped podium gardens with dedicated play space.
- 9.5** The commercial floorspace provides opportunities for a variety of uses and operators (including community organisations) and the units have been designed flexibly so that they are future proofed to respond to changes in market conditions. It is envisaged that the floorspace could yield approximately 90 jobs which is a significant uplift above the existing provision of 66 jobs across the Site.
- 9.6** With regard to community uses, capacity is provided for new community-type uses including the potential for a nursery. The proposals provide an opportunity to improve access to the Dominion Centre as an existing community asset by incorporating public realm around it.
- 9.7** From design perspective, the layout of the proposed development will enhance permeability and pedestrian linkages which currently heavily constrain the Site. A mix of ground floor commercial uses are proposed which will provide continuous active frontages along The Green and which assist with defining a vibrant street.
- 9.8** The buildings are of a high-quality design and use durable materials that will set a benchmark for future development in the area. The taller elements of the scheme are grounded and provide a positive interaction at street-level and have no detrimental impact on protected views, heritage assets or the amenity of nearby established residential uses.

- 9.9** The public realm is legible and provides ample opportunities for sitting and dwelling that will assist in place-making. The public realm will also provide linkages and views to the Grade II* listed Manor House which will enhance its setting and reinforce its role as a focal point and landmark in Southall.
- 9.10** The proposed development provides tangible environmental benefits including reducing surface water run-off to that of the greenfield run-off rate, new tree planting, ecological benefits including a bio-diversity net gain of 380%, and the adoption of energy saving techniques that have the potential to result in a carbon savings percentage of 63% against Building Regulations and London Plan policy requirements.

THE PLANNING BALANCE

- 9.11** This section of the Planning Statement provides a planning balance assessment as required under section 38(6) of Planning and Compulsory Purchase Act 2004 and Section 70 (2) of the Town and Country Planning Act 1990. These state that planning applications must be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.
- 9.12** As set out in this Statement, we consider that the proposals that form part of this application are in accordance with the development plan and there are strong material considerations that indicate why planning permission should be granted.
- 9.13** Whilst we accept that some harm could be attached to the loss of the existing business and uses currently on the Site, the harm is strongly mitigated through the re-provision of new employment and community provision that will be of a better quality, provide safer access and allow the wider objectives of Site Allocation SOU8 to be achieved. Furthermore, as part of the flexible uses sought, there is potential for existing businesses and uses to be re-provided as part of the development. As such, we consider that only limited weight can be given to this as an aspect that counts against the scheme.
- 9.14** The Heritage and Townscape Assessment concludes there would be a low level of harm attached to the demolition of the locally listed substation. However, this should be considered under paragraph 197 of the NPPF, whereby given the low level of significance of the building to be demolished, the limited area in which it will be experienced and the necessity of the works to deliver the redevelopment of the Site, the demolition is, on balance, considered to be acceptable. Furthermore, no significant effects on heritage are expected to arise as a result of the development proposals and it is concluded that the proposed development would not cause harm to identified designated heritage assets through change to their settings. As such, in accordance with the NPPF, there is no requirement to weigh heritage impacts against public benefits.
- 9.15** Notwithstanding the view set out in the Heritage and Townscape Assessment that there would be no harm to designated heritage assets, should the decision-maker take a different view and conclude that there was harm, we are of the view that it would certainly be less than substantial harm and would be clearly outweighed by the significant planning benefits of the development.
- 9.16** These significant planning benefits which weigh heavily in favour of planning permission being granted include the following:
- It will regenerate and optimise a brownfield under-utilised site close to a well-established public transport network;

- It will deliver tangible economic benefits to Southall, both through the construction phase and the end user phase;
- It will create approximately 90 jobs across a variety of use classes. This includes creative workshop studio space, light industrial space, office space, retail and community space;
- The commercial uses will activate the ground floor and provide active frontage and natural surveillance. Coupled with the residential development above, the mix of uses proposed will generate activity throughout all parts of the day;
- It will deliver 564 new homes in Southall, 50% of which will be affordable. This will make a significant contribution to meeting local housing needs and assist the Council in meeting its housing targets;
- It will deliver a range of unit sizes, all of which will have external private amenity space and access to shared podium gardens with designated young children's play space;
- The layout of the scheme will enhance permeability and pedestrian links through this part of Southall which will improve walking journey times to the Southall Train Station;
- The public realm will use high quality materials with opportunities for sitting and dwell-time to assist in local place-making;
- The design of the buildings showcase strong architectural design with tall buildings that are grounded and provide a positive interaction with the street;
- The proposals promote greener modes of travel and deter car dependency, through enhanced permeability, pedestrian links and opportunities for cycle parking; and
- The proposals will deliver tangible environmental gains including new tree planting, ecological enhancements, reduced surface water run-off, and carbon reduction measures.

9.17 In view of the above, we consider that the proposal satisfies the key policy considerations identified in this Statement and accords with **Paragraph 11** of the NPPF which requires the approval of development proposals that accord with an up-to-date development plan without delay. Furthermore, the material considerations identified above clearly weigh strongly in favour of planning permission being granted.

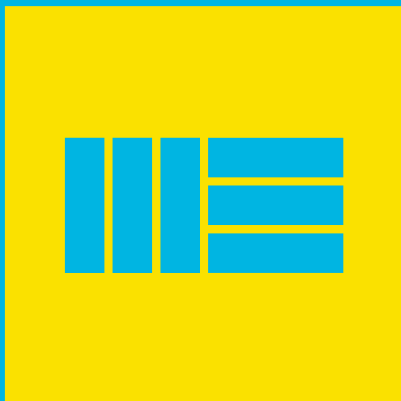
9.18 In conclusion, therefore, we commend this application to the Borough for approval.

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.