

## Land adjacent to the Green, Southall

Local Planning Authority: Ealing

local planning authority reference: 215058FULR3

### Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

### The proposal

Demolition and mixed-use redevelopment to provide 3 urban blocks comprising 564 residential units (Use Class C3), flexible commercial, employment and community floorspace (Use Classes E, F1 and F2), private and public car parking, servicing bays, public realm and associated landscaping, play and amenity space, plant and refuse areas, and access arrangements.

### The applicant

The applicant is **Peabody** and **London Borough of Ealing**, and the architect is **Hunters**.

### Strategic issues summary

**Land use principle:** The residential-led redevelopment of this brownfield industrial site to provide commercial and residential use is acceptable in land use terms. However, further information is required in relation to the potential loss and reprovision of the community/night-time uses. (paragraphs 20 – 38).

**Housing:** 50% affordable housing by habitable room is proposed with a split of 62% Affordable Rent/ 38% Shared Ownership units. This offer meets the Fast Track route requirements and is supported. Early stage review mechanism and the affordability of the units must be secured. Appropriate contributions towards playspace provision should be secured (paragraphs 39 – 50).

**Urban design:** The site is not identified in the development plan as suitable for tall buildings and, as such, the proposal does not comply with London Plan Policy D9.B. The issue of non-compliance will be considered at the Mayor's decision-making stage having regard to the material considerations of the case, and the public benefits of the proposed development. The proposed layout of the scheme is broadly supported. Appropriate mitigation measures in relation to agent of change principles, public access to the open space and a revised fire strategy should be secured (paragraphs 51 – 72).

**Heritage:** The proposal would result in less than substantial harm to the setting of the Grade II\* Manor House and Grade II War Memorial and would result in loss of a non-designated heritage asset. Whilst it is possible that public benefits (including provision of affordable housing and public realm improvements) could outweigh the identified harm, this balance will be considered fully at the Mayor's decision making stage (paragraphs 73 – 85).

**Transport:** Further information and clarifications are required in respect of Healthy Streets, trip generation and necessary mitigations to promote active travel. The car parking provision should be removed in line with the London Plan objectives of car free development. Cycle parking should comply with LCDS and the overall quantum should be appropriately secured. A Travel Plan, full Delivery and Servicing Plan, and Construction Logistics Plan, Parking Management Plan, contribution towards bus service improvements and CPZ permits should be secured (paragraphs 86 – 99).

**Sustainable infrastructure and environmental issues:** Further information is required on energy with respect to energy efficiency, renewable energy, overheating and energy monitoring. Further information in relation to WLC, circular economy, sustainable drainage, water and air quality is required (paragraphs 100 – 113).

### Recommendation

That Ealing Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 117. Possible remedies set out in this report could address these deficiencies.

## Context

1. On 07 September 2021, the Mayor of London received documents from Ealing Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following categories of the Schedule to the Order 2008:
  - Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."
  - Category 1B: "Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres"
  - Category 1C: "Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London."
3. Once Ealing Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>.

## Site description

5. The approximately 1.97 hectares site is within the Southall Opportunity Area, the Southall Housing Zone and King Street Neighbourhood Centre. The site forms part of a wider site allocation (SOU8) identified in Ealing's Development Sites DPD, for mixed use development including housing and industrial uses.
6. The site is located to the west of The Green and to the north of Featherstone Road and comprises a mix of low-rise industrial and commercial uses, including banqueting halls and a public car park containing 150 parking spaces. To the north are the large scale industrial units of TRS Suterwalla & Sons, further north is the railway line serving Great Western Railway and TfL Rail services to Heathrow Airport, Paddington and Reading. To the east are medium scale industrial units, these units and TRS lie within the Southbridge Way Locally Significant Industrial Site (LSIS) designation bounding the site to the north and east. The south of the site includes Dominion Road to the west of which is an urban block comprising a mix of commercial and community uses, including the

Sikh National Resource Centre, fronting Featherstone Road, and the Southall Working Men's Club fronting Featherston Terrace.

7. Further south is a mix of retail and residential uses. Adjoining the site to the north-east is St Anselm's Church. The site is set back behind a retail parade fronting onto The Green to the east and the Dominion Centre and Library to the south-east. To the north-east beyond The Green are a mix of commercial and residential buildings, directly opposite the site to the east is the Grade II\* listed Southall Manor House, the Grade II listed Southall War Memorial and the Manor House Grounds. To the south-east of the site are a mix of commercial and residential uses and the St Anselm Catholic Primary School.
8. Merrick Road (A3005), approximately 500 metres to the east of the site is part of the Strategic Road Network (SRN). The M4 Motorway is approximately 2 kilometres to the south of the site and provides access to Heathrow Airport to the west.
9. Southall Rail station is approximately 300m from the northern edge of the site. This station offers Great Western Rail and TfL Rail services and will serve the Elizabeth Line, subject to completion of improvement works and when the line fully opens.
10. The site is served by six bus routes, with 'The Green' being the nearest stop. Consequently, the site achieves a public transport access level (PTAL) of 4, on a scale of 0 to 6b, where 6b is the highest.

## **Details of this proposal**

11. The proposed development is brought forward as a joint venture between Peabody Developments Limited and the London Borough of Ealing. The application seeks full planning permission for demolition of existing buildings and mixed use redevelopment of the site to provide 564 residential dwellings (Use Class C3) and 2922.8 sq.m. of flexible commercial and employment floorspace (Use Classes E, F1 & F2). The proposals constitute three urban blocks ranging between 2 – 19 storeys in height (ground inclusive).
12. 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. The scheme further includes servicing bays, public realm and associated landscaping, play and amenity space at podium level, plant and refuse areas, and access arrangements.
13. The proposal would have a phased delivery, with Block A and proposed car park at Featherstone Terrace being delivered first, followed by Block B, and Block C comprising the final phase.

## **Case history**

14. GLA officers held pre-application discussions with the applicant and the Council in September 2019 (GLA Ref: 5025). The principle of the comprehensive

redevelopment of the site to provide 550 residential units with 50% affordable housing in an opportunity area was supported in land use terms. The applicant was advised that matters in relation to social infrastructure provision; details of affordable housing; urban design; inclusive access; climate change; and, transport should be addressed at planning application stage.

15. GLA officer provided follow-up written pre-application advice for the current scheme in August 2021 (GLA Ref: 2021/0573/P2F). The amendments to this scheme included the retention of the Tudor Rose Building due to its importance as a cultural and community asset, particularly the Black Caribbean Community; and consequential impacts on vehicle access and the design of Block B3; and a reduction in commercial floorspace.
16. The principle of the redevelopment of the site to provide flexible commercial floorspace and residential units was acceptable in land-use terms, however, the applicant was advised to demonstrate that the proposal can sufficiently accommodate all uses and that existing community facilities are not unduly displaced. Advice was also given with respect to land use principle, housing, affordable housing, urban design, layout of the site and the heights of the proposed buildings, inclusive design, heritage, transport and sustainability.

## **Strategic planning issues and relevant policies and guidance**

17. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Ealing Development Strategy DPD 2026 (2012), Ealing Development Sites DPD (2013), Ealing Development Management DPD (2013), and, the London Plan 2021.
18. The following are also relevant material considerations:
  - The National Planning Policy Framework and National Planning Practice Guidance;
  - Southall Opportunity Area Planning Framework (July 2014);
  - Draft Southall Green SPD.
19. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

<ul style="list-style-type: none"><li>• Good Growth</li><li>• Economic development</li></ul>	<ul style="list-style-type: none"><li>London Plan;</li><li>London Plan; the Mayor's Economic Development Strategy; Employment Action Plan;</li></ul>
<ul style="list-style-type: none"><li>• Opportunity Area</li><li>• Industrial land</li><li>• Housing</li></ul>	<ul style="list-style-type: none"><li>London Plan;</li><li>London Plan;</li><li>London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG;</li></ul>

- Affordable housing London Plan; Affordable Housing and Viability SPG; the Mayor's Housing Strategy;
- Retail London Plan;
- Community and cultural facilities London Plan;
- Urban design London Plan; Character and Context SPG; Public London Charter LPG; Good Quality Homes for All Londoners draft LPG;
- Heritage London Plan;
- Inclusive access London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG;
- Sustainable development London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; 'Be Seen' Energy Monitoring Guidance draft LPG; Mayor's Environment Strategy;
- Air quality London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG;
- Transport and parking London Plan; the Mayor's Transport Strategy;
- Equality London Plan; the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG;
- Biodiversity London Plan; the Mayor's Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG.

## **Land use principles**

### Southall Opportunity Area and Housing Growth

20. London Plan Policy SD1 identifies the Southall Opportunity Area as having capacity to accommodate a minimum of 9,000 homes and 3,000 jobs. Policy SD1 identifies opportunity areas as the capital's most significant locations for development capacity and seeks to ensure that development capacity is delivered in a sustainable and integrated way to enable successful delivery of the growth targets outlined above. More specifically, the Southall Opportunity Area Planning Framework (2014) recognises the future arrival of Crossrail and availability of brownfield land as a key catalyst for sustainable growth and intensification in the Southall area.

21. The proposals seek to provide 2922.8 sq.m. of flexible commercial floorspace across the development on the ground and first floor levels. Table 1 sets out a

breakdown of proposed employment floorspace. The Commercial Justification report submitted in support of the application indicates that this quantum of non-residential floorspace will support 90 FTE jobs. The provision of employment floorspace within an opportunity area is acceptable in land use terms.

<b>Proposed uses and floor space</b>	
<b>Flexible commercial use (Class E)</b>	2,502.1 sq.m
<b>Nursery (Class F1)</b>	313.8 sq.m
<b>Community use (Class F2)</b>	106.9 sq.m
<b>Total</b>	2,922.8 sq.m

Table 1: Proposed non-residential land uses

22. As noted above, the site is also located within the Southall Housing Zone. London Plan Policy H1 seeks to increase the supply of housing in the capital. Table 4.1 in the London Plan sets Ealing a target 21,570 homes to be delivered between the period of 2019/20 to 2028/29. The proposed housing targets identified in the London Plan reflects the pressing need for housing in the borough as well as London more generally. London Plan Policy GG2 provides support to high density mixed-use developments on brownfield sites and London Plan Policy H1 Part B further supports housing delivery on sites in close proximity to a station and redevelopment of car parks, such as this site. The proposed scheme would provide approximately 564 homes, contributing to an increased housing supply within the London Borough of Ealing in response to the strategic targets set out above, which is acceptable in land use terms.

### Industrial land

23. A parcel of land in the north west corner of the site is within the Southbridge Way LSIS, and currently comprises a private coach park. The wider LSIS adjoins the site to the north and west. A cluster of units predominantly providing vehicle repair services is located in the north east of the site within Dillway Estate, these are considered to be non-designated industrial sites (NDIS). The site currently comprises approximately 3,400 sq.m. of non-designated industrial floorspace (class B2/B8), and approximately 364 sq.m. of industrial floorspace (class B8) within the LSIS.

24. London Plan Policies E4 and E7 seek to maintain a sufficient supply of land and premises in London to meet current and future demand for industrial and related functions and support the intensification of industrial uses on designated industrial sites, and in certain circumstances, co-location with other uses. Policy E7 further stipulates that selected parts of SIL or LSIS could be intensified to provide additional industrial capacity, as well as to support delivery of residential and other uses. This approach should be considered as part of a plan-led or masterplanning process of LSIS intensification and consolidation.

25. London Plan Policy E6 provides guidance on LSIS, stating that a range of land uses are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 land uses, suitable for SMEs and should be distinguishable from other employment areas which can accommodate a range of business users.

26. Policy E7.C further states that mixed-used and residential redevelopment of NDIS should only be supported where (1) it has been demonstrated that there is no reasonable prospect of the site being used for the industrial and related purposes or; (2) the site has been allocated in an adopted Local Development Plan Document for residential or mixed-use development; or (3) industrial, storage or distribution floorspace is provided as part of mixed-use intensification.
27. The site is included within a wider site allocation (SOU8) in the Ealing's Local Plan for mixed-use redevelopment. The site allocation states that the existing industrial uses will continue to be safeguarded for B1c, B2, and B8 industrial uses. Noting the site allocation, which seeks mixed-use development for the wider LSIS to provide residential and industrial uses, GLA officers consider that the redevelopment of this LSIS and NDIS would be part of a plan-led process as required by Policy E7.
28. The proposals comprise 2,922.8 sqm of new flexible commercial floorspace (Class E/F1/F2), which would represent a net loss of the industrial floorspace on the site. Despite a net loss of industrial floorspace, officers note that the proposed development would provide new high quality floorspace which would be designed flexibly to accommodate a range of workshop typologies, including flexible space suitable for light industrial, retail and other employments uses. It is also noted that the Commercial Justification report submitted in support of the application recommends that the ground floor of blocks A and B should be focused to provide light industrial workshop uses to deliver a scheme that is better suited to the environment and to avoid potential commercial voids. Therefore, considering the site's mixed-use allocation and its position within the Southall Opportunity Area, a residential-led redevelopment of the site follows a plan-led approach. As such, notwithstanding the net loss of industrial floorspace, the land use principle of the development is acceptable in line with London Plan Policy E7.
29. To ensure the industrial floorspace secured meets the operational requirements of any future industrial end-users at the site, key design and servicing requirements in relation to floorplate dimensions, minimum floor to ceiling height, access and servicing, fit out should also be appropriately secured by the Council.
30. London Plan Policy E7 requires that industrial and related activities on-site and in surrounding parts of the LSIS are not be compromised in terms of their continued efficient function, including for access, and that appropriate design mitigation is provided in any residential elements, in line with the Agent of Change principle, set out in London Plan Policy D13, which is discussed later on in the report.
31. London Plan Policy E3 supports provision of affordable workspace at rents maintained below the market rate for that space. The applicant should therefore consider providing an element of the workspace at low-cost rents as part of any development.

#### Social Infrastructure/community facilities

32. London Plan Policies S1-S3 support the provision of high quality, new and enhanced public infrastructure including healthcare, education, childcare and community uses in accessible locations. The proposals include 313.8 sq.m. of

nursery floorspace. This is supported in principle given the provision of high density housing development on site.

33. London Plan Policies SD6, HC5 and HC6 seek to promote London's cultural offer and night-time economy in line with the Mayor's 24-hour vision for London. Policy HC5 seeks to protect existing cultural venues, facilities and support the development of new cultural venues in town centres and places with good public transport connectivity. Policy HC6 seeks to protect and support evening and night-time cultural venues such as pubs, night clubs, theatres, cinemas, music, and other arts venues.
34. The application site includes The Monsoon and Milan Palace Banqueting Suites which could be considered as night-time economic activities and are understood to be predominantly used by the Indian Community. The site also includes temporary buildings of the Resource Centre located on the Council owned land, which is led by a number of Somali-led groups. GLA officers consider that the nature of the banqueting suites and the Resource Centre provide local community facilities. The proposals would result in loss/displacement of these three community and night-time economic venues.
35. The submission material indicates that given the nature of the flexible commercial floorspace there is potential for such uses to be re-provided as part of development. The proposals incorporate 106.9 sq.m. floorspace of community use (Use Class F2), which could be increased subject to demand. The applicant further contends that there are a number of existing community facilities in close proximity of the site including the Tudor Rose, the Dominion Centre, and The Manor House, as well as other banqueting suites within Southall ensuring there remains such facilities in the locality.
36. Whilst the potential for re-provision of these facilities is welcomed, noting the indicative floorspace of circa 106 sq.m. allocated for community uses, it is not clear whether all or some of these facilities could be sufficiently re-provided on site. In addition, noting the overall proposed flexible commercial floorspace, which seeks to accommodate a range of uses, it is not clear whether the proposals could sufficiently accommodate all uses. GLA officers seek further discussions with the applicant's team and the local planning authority to establish how, further to robust stakeholder engagement, an appropriate balance of on-site re-provision / off-site relocation can be found for these community and night-time economic uses in response to London Plan Policy Policies SD6, HC5 and HC6.

### Equality

37. London Plan Policy GG1 promotes openness, diversity and equality to help deliver strong and inclusive communities. More generally, the 2010 Equality Act places a duty on public bodies, including the GLA, in the exercise of their functions, to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. As requested at pre-application stage, the applicant should demonstrate that detailed engagement has taken place and that the potential impacts of the proposal on people and communities who share a protected characteristic and who will be affected by it have been considered appropriately.



## Land use principle – conclusion

38. The proposed residential led redevelopment of industrial land is acceptable in land use terms. Further information is required to demonstrate that there is sufficient floorspace available on site to accommodate community uses. In particular GLA officers seek to establish the proposed balance of on-site reprovision / off-site relocation for the existing community and night-time economic uses at the site to ensure that any impacts associated with the proposed displacement of these uses is robustly considered and appropriately mitigated. The Council should also consider restricting relevant quantum of the proposed flexible commercial floorspace for industrial and community use, as opposed to other uses within Class E, in line with the objectives both London Plan and Local Plan policies.

## **Housing**

39. The scheme would provide 564 units and a breakdown of unit mix is outlined in Table 2 below:

Tenure	1-Bed	2-Bed	3-Bed	4-Bed	total units	total habitable rooms	% by unit	% by habitable room
Affordable Rent	63	56	28	10	157	494	48%	50%
Intermediate Rent	54	48	10	-	112	302		
Market	142	140	13	-	295	769	52%	50%
<b>Total</b>	<b>259 (45.9%)</b>	<b>244 (43.3%)</b>	<b>51 (9%)</b>	<b>10 (1.8%)</b>	<b>564</b>	<b>1,565</b>	<b>100%</b>	<b>100%</b>

### Affordable housing

40. London Plan Policies H5 and H6, as well as the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing in all new developments. Policy H5 identifies a minimum threshold of 50% affordable housing by habitable room on public and industrial land, with the specified tenure split, without public subsidy, and meeting other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor. Such applications can follow the Fast Track Route and are not required to submit a viability assessment or be subject to a late stage viability review. On industrial land, where redevelopment would result in net loss of industrial capacity, a minimum of 50% affordable housing by habitable room must be provided to be eligible for the Fast Track Route.

41. Policy H6 and the Mayor's SPG sets out a preferred tenure split for market housing schemes of at least 30% low cost rent, at least 30% intermediate, and the remaining 40% to be determined by the local planning authority taking into account relevant Local Plan policy. There is an expectation that the remaining

40% is weighted towards an affordable rented product. Locally, Ealing's Local Plan sets a strategic target of 50% affordable housing, with a tenure split of 60% social/affordable rent and 40% intermediate housing.

42. The site is in mixed ownership and comprises private and public land. The site also comprises of industrial land and the proposal would not reprovide equivalent industrial capacity. As such, 50% affordable housing threshold would apply to this site to be eligible for the Fast Track Route.
43. The applicant proposes to deliver 50% of the scheme by habitable room as affordable housing with a tenure split of 62% Affordable Rent units and 38% London Shared Ownership units. The proposed affordable housing provision meets the strategic target and is supported. Subject to confirmation from the borough that the proposed tenure split, and affordability levels of proposed Affordable Rent tenure meets local requirements, the development would be eligible to follow the Fast Track Route.
44. The applicant should note that intermediate shared ownership products should be secured as affordable to a range of incomes below the upper limit of £90,000 per annum and benchmarked against the monitoring figure in the London Plan Annual Monitoring Report. In addition to this, annual housing costs (including service charges, rent and any interest payment) should be no greater than 40% of net household income. Further confirmation on how a range of income thresholds would be secured must be submitted. All affordable housing (including tenure split and affordability) must be agreed with Ealing Council and robustly secured in perpetuity, within a S106 agreement.
45. An early stage review will be required. If for any reason it is confirmed that the scheme is not fast track compliant, a late stage review and publication of all viability assessments associated with the application would also be necessary.
46. A draft of the S106 agreement must be provided to the GLA for review as soon as one is available to ensure that Affordable Rent levels and an early stage review have been secured and eligibility criteria for the intermediate units comply with the London Plan requirements.

#### Housing choice

47. London Plan Policy H10 encourages a full range of housing choice and states that for low cost rent housing boroughs should provide guidance on the size of units required to ensure affordable housing meets identified needs.
48. The proposal includes 45.9% one-bedroom units, 43.3% two-bedroom units and 9.0% three-bedroom units and 1.8% four-bedroom units. The proposed scheme includes a greater proportion of one-bedroom units, with provision of three and four bedrooms allocated to affordable rent units. Given the location of the site in an Opportunity Area, the proposed mix of units is broadly supported in strategic planning terms. The Council should confirm that the proposed mix meets local needs in this location.

### Children's play space

49. London Plan Policy S4 seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq. m. per child and that is not segregated by tenure.
50. The proposal would provide 1,215 sq.m. of dedicated play space for children aged 0 – 4 with a proportion of the 5 -11 years around the site, which is a shortfall of 309 sq.m for children under 12 years old and a shortfall of 774 sq.m. for all ages. The Council should secure appropriate contributions towards off-site play provision. Once the final provision has been confirmed, all playspace should be retained in perpetuity.

### **Urban design**

51. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

### Optimising development capacity

52. London Plan Policy D4 requires that all proposals exceeding 30 metres in height and 350 units per hectare must have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny. The proposed development will achieve a density of 301 units per hectare, which equates to 835 habitable rooms per hectare. Bearing in mind the character of the area and PTAL of the site, the proposed residential density is at the upper end of what would be considered sustainable. In light of this, the proposed development has been reviewed by a Design Review Panel and the Council's pre-application process, which is welcomed. In terms of the development's long-term sustainability, information on servicing has been provided and should be secured appropriately. The Council should also secure mechanisms for long-term management and affordability of the development.

### Development layout

53. The broad site layout is generally supported and the applicant's efforts to knit the proposal into its surroundings is welcomed. The proposal includes a series of character areas and public spaces at ground floor level. The strategy of maximising active frontages across the site would help define the public space, which is supported. The proposal would open up views to the Manor House from within the site and the tall buildings would be set back from the street frontage to reduce the visual impact at street level, which is supported. High quality landscaping and planting provision along the street edges should be secured to minimise the dominance of private vehicles across the site. The site envelopes the transformer site and access requirements for this site should be appropriately secured.

54. The proposal includes residential units at ground floor level of Blocks A1 and A2 directly adjacent to LSIS to the west. As noted at pre-application stage, GLA officers consider that this is not an ideal location for residential units, however, it is noted that the adjacent industrial units back onto Featherstone Terrace in this location, which would minimise any adverse impact on these residential units. The Council should secure appropriate screening and mitigation measures to protect the residential units against adverse noise and air quality impacts.

### Tall buildings

55. London Plan Policy D9 seeks to manage the development and design of tall buildings within London. It states that tall buildings should only be developed in locations identified as suitable in development plans, provided that their visual, functional, environmental and cumulative impacts are addressed. The proposed scheme would range between 2 and 19 storeys in height. The range of heights proposed would be considered as tall buildings as per Ealing's Local Plan policies which define what is meant by a tall building based on context of the surrounding area.

### *Appropriateness of site for tall buildings*

56. Policy 1.2(h) of Ealing's Core Strategy and Policy 7.7 of Ealing's Development Management DPD state that tall buildings may be suitable in specified sites within Acton, Ealing and Southall town centres, gateways to Park Royal and identified development sites only. Specific locations identified as suitable for tall buildings will be designated through the Development Sites DPD and through SPDs/AAPs. Whilst the proposal is within King Street Neighbourhood Centre, the site allocation SOU8 does not identify the site as suitable for tall buildings, as such GLA officers consider that the proposals for tall buildings are not in an area specifically identified suitable for tall buildings in the Development Plan and is contrary to the locational requirements of London Plan Policy D9.B.

57. Notwithstanding this and having regard for the Opportunity Area status, the proximity to a transport node, and the changing character of the Opportunity Area, and emerging tall buildings in the surrounding area, a case for tall buildings in this location could be made - subject to addressing the assessment criteria within D9.C, and having regard to the material considerations of the case and securing an appropriate balance of public benefits. With respect to strategic policy requirements under Policy D9, the visual, functional, environmental and cumulative impacts of the proposals are considered below.

### *Visual impacts*

58. The proposed development comprises of 3 urban blocks containing buildings which would range between 2 to 19 storeys in height. The proposed tower buildings would have similar proportions and limited variation in height and massing. Despite the lack of greater variation in height, officers note that the proposed towers would have different palette of materials and variation in façade treatment which adds character to the overall development and the buildings are read as a cluster of tall buildings. The architectural details include a base, middle and crown, with primary grid to create appropriate proportions to tall buildings.

59. The final appearance of the proposals will be subject to the quality of the materials and detailing. A condition should therefore be attached by the Council to secure key construction and façade details for the scheme to achieve the highest design quality.

60. The proposed development would be clearly visible in long range views, as illustrated in the submitted Heritage, Townscape and Visual Impact Assessment (HTVIA). The proposed towers would be understood in the context of the emerging development in Southall and act as way finders and markers for the neighbourhood centre. In mid-range views from the surrounding neighbourhood, the tall buildings would have a clearly defined crown, middle and base. The materials and colour palettes respond to the surrounding area. In short-range views, the materiality and proportion of the ground floor residential and commercial space responds to a human scale. The proposed public amenity space will create activity around the site.

61. In terms of other visual impacts, the proposed development would result in less than substantial harm to heritage assets, considered further below.

#### *Functional impacts*

62. In terms of functional impacts, the proposed tall buildings have a logical internal layout, and accessible entrances. The development also provides publicly accessible landscaped amenity space, which would create activity around the site. The application site has a PTAL of 4 and sufficient public transport infrastructure exists to support the impact of the increased activity on this site. The proposal would also deliver regenerative benefits by providing improved public realm and retail uses which would contribute to the vitality of Neighbourhood Centre. The applicant should work with the Council to ensure that any aviation, navigation or telecommunication impacts arising from the development are suitably addressed.

#### *Environmental and cumulative impacts*

63. In terms of environmental and cumulative impacts, the applicant's technical information on these aspects will be assessed in detail by the Council, including whether mitigation measures are necessary to make the application acceptable. An update will be provided to the Mayor at his decision-making stage.

64. Following a detailed assessment by the Council of the proposed tall buildings and certainty on the planning conditions and obligations on the scheme (i.e. at the Mayor's decision-making stage and further to any resolution to grant by Ealing Council), GLA officers will consider the impacts of the proposed tall building, any material considerations relevant to the proposed development, other relevant development plan policies and the wider public benefits of the scheme, in the balance against the non-compliance with London Plan Policy D9.B.

#### Public realm

65. Policy D8 of the London Plan encourages the creation of new public realm where appropriate. It states that there should be a mutually supportive relationship

between the public space, surrounding buildings, and their uses. London Plan Policy D9 paragraph 3.98 also states that the base of tall buildings should help create an attractive and lively public realm, that is safe, inclusive, interesting, and comfortable for pedestrians. London Plan Policy D8 also sets out that appropriate management and maintenance arrangements should be in place for the public realm. The Public London Charter London Plan Guidance (LPG) sets out how public spaces should be managed and maintained “with the aim of ensuring that London’s public spaces are safe, accessible, inclusive, attractive, well-connected and easy to understand, well maintained and serviced”. The provision of public open space on the site is supported, particularly given that the site is located in an area identified as being deficient in public open space. The Council should secure long term management and maintenance of the public realm and ensure there is no segregation by tenure.

### Residential quality

66. London Plan Policy D6 promotes quality in new housing provision, with further guidance provided in the Mayor’s Housing SPG. The unit sizes either meet or exceed the London Plan minimum space standards and the scheme provides sufficient outdoor amenity space.
67. The proposed development will provide 76% of units as dual aspect, with no single aspect north-facing units. The proposed development has an efficient core to unit ratio. Deck access has been incorporated into parts of the scheme which has helped to improve the percentage of dual aspect units. This is welcomed.
68. External amenity space is provided within the public space around the site as well as at podium level which is available to all residents within the development. The Council should appropriately secure access to the roof terrace for all residents.

### Fire safety

69. The applicant has submitted a Fire Safety Report. Information is provided on means of escape, features to reduce risk to life such as sprinklers and access for fire service personnel. However, the fire statement does not fully comply with the requirements of London Plan Policy D12. The Fire Safety Report should be updated to address these requirements, including details of how future modifications to the building will not compromise the base build fire safety and protection measures, and details of evacuation of disabled people. The applicant should provide fire evacuation lifts in all building cores in line with London Plan Policy D5 and the location of these lifts should be clearly shown in the fire statement and on relevant plans.

### Inclusive access

70. London Plan Policy D5 requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’ (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’. The proposal would provide 10% of homes as wheelchair accessible, which would be distributed

across each tenure. The Council should secure M4(2) and M4(3) requirements by condition or planning obligation.

### Agent of change

71. The applicant has set out how the proposed development has been designed to mitigate any adverse impacts on the users of the development, future residents and the operation of the nearby industrial units. For example, the design of the scheme incorporates necessary mitigation measures such as mechanical ventilation and higher specification of glazing to ensure there are acceptable level of internal noise for residential units and proposed local amenity. The existing neighbouring commercial uses face away from the proposed development and are provided with separate access points to limit conflicts, which will allow adjacent uses to continue to operate independently. Detailed technical reports should be assessed by the Council to ensure that a suitable residential environment could be created both internally and externally. These will be assessed in detail by the Council and an update will be provided to the Mayor at his decision-making stage. The Council should ensure that appropriate conditions are secured to ensure suitable noise conditions in the residential scheme and the implementation of any necessary mitigation measures to address the requirement of agents of change principles in line with London Plan Policy D13.

### Digital connectivity

72. London Plan Policy SI6 states that development proposals should ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s capable connection is made available to all end users. The Council should therefore ensure that this is provided and secured.

## **Heritage**

73. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should “have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”. In relation to conservation areas, special attention must be paid to “the desirability of preserving or enhancing the character or appearance of that area”.

74. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset’s physical presence or its setting. Where a proposed development will lead to ‘substantial harm’ to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that

the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. London Plan Policy HC1 states that development should conserve heritage assets and avoid harm.

75. There are no designated heritage assets within the site. The listed (Grade II\*) Southall Manor House and Southall War Memorial (Grade II) are located opposite the site east, further to the north of the site is the listed (Grade II) Water Tower. The site contains a locally listed Stable and Coach House which is proposed to be demolished. There are a number of other locally listed buildings around the site including St Anselm's Church which is located adjacent to the site.

*Grade II\* Southall Manor House and Grade II Southall War Memorial*

76. The heritage significance of the Manor House and War Memorial is derived from their architectural and historic value. Although the proposed development maintains a significant separation distance from these heritage assets, the scale of the development would result in a change to the setting of these heritage assets as it would be visible in the backdrop of the listed building and war memorial. However, the proposal would be set behind the existing line of buildings on the north side of The Green and would not change the appreciation of the significance or cause harm to the intrinsic value of these heritage assets. The street frontage to the Green would be unchanged, and the set-back nature of the development would not obscure views of the front elevation of the Manor House. Officers consider that the increased visibility of the proposed development above and behind the Grade II\* Manor House and Grade II Southall War Memorial would have a less than substantial harm to the setting and thereby the significance of these heritage assets.

*Grade II Water Tower and Grade II\* Liberty Cinema*

77. The heritage significance of the Water Tower is derived from its historical and architectural interest as a good example of a late 19th century water tower, and as a remnant of the early sanitary infrastructure in the area.
78. The listed Water Tower maintains a generous separation distance from the application site, and whilst the juxtaposition of the site would allow views of the development in the backdrop of the Water Tower from some roads, it would not be visible in the immediate setting of the Water Tower, and would not obscure primary views of this heritage asset. As such, the proposal is not considered to have a harmful impact on the setting and significance of this heritage asset.

*Grade II\* Liberty Cinema*

79. The heritage significance of the Liberty Cinema is also derived from its historical and architectural interest as a Chinese-style building used as a cinema. This listed building maintains a generous separation distance from the application site, and the proposal would not be visible within the immediate setting of this heritage asset. As such, the proposal is not considered to have a harmful impact on the setting and significance of this heritage asset.



### *Locally listed Stable and Coach House*

80. The proposal would result in loss of this locally listed building. Paragraph 203 of the NPPF states that “the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. 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”.
81. The two storey pitched roof building is set back from the street frontage and is experienced within a relatively contained context of the surrounding buildings. The building has been altered over time with some unattractive modern alterations. It is understood that there is no historic or other association between the site and the locally listed building. As such, officers consider that the building has limited heritage significance due to various alterations. The building also appears dwarfed by the scale of surrounding buildings and the vernacular of the building contains low level of interest and does not contribute to the character of the wider site or the surrounding area. The HTVIA concludes that the loss of the non-designated heritage asset with a new high-quality development and public space would greatly improve the pedestrian experience around the site. GLA officers consider that although there are many examples of buildings of this type being incorporated into redevelopment proposals, in this instance the loss of the building allows for a more comprehensive redevelopment of the site with a high quality public realm and pedestrian access around the site. As such the loss of the non-designated heritage asset could potentially be outweighed by these benefits of the scheme, including provision of affordable housing and improved public realm around the site.
82. In terms of other designated and non-designated heritage assets identified within the HTVIA, the proposed building would be visible within the context of some views to and from these heritage assets. However, the proposal would maintain adequate separation distance from wider heritage assets and would be perceived alongside existing and emerging large-scale buildings. As such, GLA officers conclude that the proposed development would not harm the special character and significance of any other heritage assets.

### Heritage conclusion

83. Having analysed the assessment contained in the HTVIA and having had regard to the statutory duties in respect of listed buildings and conservation areas in the Planning (Listed Buildings and Conservation Areas) Act 1990, and the relevant paragraphs in the NPPF in relation to heritage assets, GLA officers consider that the proposal would result in less than substantial harm to the identified heritage assets.
84. This less than substantial harm amounts to a departure from London Plan Policy HC1 (which seeks to avoid harm) and therefore the NPPF heritage balance is engaged. In accordance with paragraph 202 of the NPPF, where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In

carrying out this balance, in accordance with the statutory requirements, great weight and importance should be attached to harm to designated assets.

85. The public benefits arising from this development include the provision of new housing and commercial uses on a brownfield site close to a station. The applicant proposes an affordable housing offer of 50% by habitable room as well as improvements to the public realm. Whilst it is possible that the public benefits of the proposal could outweigh the less than substantial harm to the heritage assets identified above, this balance will be considered fully at the Mayor's decision making stage, having regard to the results of the assessment by the Council and Historic England, the other material considerations of the case and the public benefits secured as part of any Council resolution to grant planning permission.

## **Transport**

### Active travel zone (ATZ), healthy streets & vision zero

86. Officers note that the ATZ identifies possible improvements including new and enhanced pedestrian crossing facilities and warning signs in Featherstone Road, The Green and other parts of the assessed routes. Whilst the potential need for these improvements is acknowledged, TfL would welcome further discussion with the applicant regarding the assumptions and methodology applied as part of the ATZ to ensure this accurately reflects the distinct characteristics of Southall town centre and its various active travel user groups in accordance with TfL Healthy Streets and Vision Zero objectives, and London Plan Policies T4B and D8. The process for taking forward the improvements identified by the ATZ, is supported, and it is expected that following and updated ATZ assessment, appropriate S106 obligations, including financial contributions and section 278 agreement will be secured.

### Access

87. The proposal includes multiple access points for all modes. Existing vehicular access points on The Green and Featherstone Road are retained, albeit modified to improve conditions for active modes. The proposed access arrangements including proposed modifications such as widening of footways in Featherstone Road, are accepted.
88. Vehicles are limited from accessing the heart of the scheme in order that pedestrian and cyclists are prioritised, while the proposed internal shared surface areas will incorporate defined pedestrian paths, which is welcomed. The details of proposed internal shared surfaces should be appropriately secured in consultation with TfL.
89. Delivery and servicing vehicles are accommodated in loading bays adjacent to each of the proposed blocks. The tracking diagrams provided demonstrate that the loading bays, turning areas and access routes are adequate for large vehicles. The submitted Delivery and Servicing Plan (DSP) contain provisions for monitoring and enforcement and it is noted that access to the central service route and shared surface from The Green, will be controlled, to limit vehicle flows

and prevent unauthorised vehicles from accessing this area. The delivery provisions comply with London Plan Policy T7. The final DSP should be appropriately secured.

### Parking

90. The proposal includes a total of 150 car parking spaces, comprising 90 retained public car parking spaces (including 10 Blue Badge spaces) and 60 residential parking spaces (including 35 Blue Badge spaces). The retention of 90 public car parking spaces represents a 40% reduction compared to the existing 150 spaces. It should be noted that a key objective of the London Plan Policies SD7 and H1 is making the best use of land and where sites are well-connected by public transport the redevelopment of car parks is considered a way of improving conditions for walking and cycling, and encouraging greater use of sustainable modes of transport. Removing town centre car parking is an effective way to deliver mode shift and promote a car-free lifestyle. This aligns with the central aim of the Mayor's Transport Strategy i.e. 80% of trips in London to be undertaken by active and sustainable modes by 2041. Additionally, the area suffers from heavy road congestion, which will be exacerbated by an increase in vehicle movement from the development. To this end, officers recommend that the Council considers removal of all public car parking spaces, except for Blue Badge parking.
91. The provision of 35 Blue Badge parking spaces represents 7% of the total residential units. This exceeds the London Plan Policy T6.1 requirement of 3% from the outset. The proposal also includes 25 general residential parking spaces. However, London Plan Policy T6 presumes in favour of car-free development for sites in such well-connected locations. The provision of general car parking for the residential element is therefore not in line with the requirements of Policy T6. As such, officers consider that general residential car parking should be removed from the scheme. Additionally, a further 3% passive Blue Badge parking for the residential element will need to be provided as and when required in the future. This should be prioritised over general car parking.
92. The provision of 20% active Electric Vehicle Charging Points (EVCP), and the remaining passive EVCP, is in line with the minimum requirements in the London Plan. Additionally, the provision of 10% EVCPs in the short stay public parking spaces is welcomed. A Car Park Management Plan (CPMP), which details the arrangements for allocation of car parking, reallocation of car parking if not in use, a charging mechanism for any general car parking and provisions for monitoring and enforcement, should be secured by legal agreement. EVCPs and the Blue Badge provision should be appropriately secured by condition. Consent should be subject to an S106 obligation which removes residents' entitlement to CPZ parking permits.
93. The proposed cycle parking accords with the minimum requirement set out in London Plan Policy T5. 1,006 long-stay cycle parking spaces, including 46 for oversized bicycles, will be provided for the residential element. These are accommodated at mezzanine level (accessed via London Cycle Design Standards (LCDS) compliant lift) for Block A and at ground floor for Blocks B and C. Cycle parking for the commercial element are accommodated in secure cycle

stores on the ground floor. Additionally, policy-compliant short-stay cycle parking spaces are provided in the public realm areas. The applicant must ensure that the cycle parking accords with the LCDS guidance. Details of all cycle parking should be secured by condition.

### Trip generation and impacts

94. The conclusions of the Transport Assessment (TA) with respect to traffic impacts are noted but the trip generation and traffic impact assessment will need to be updated to reflect the recommended changes to the car parking provision i.e. proposed removal of public car parking and general car parking for the residential element. Further comments on the traffic impacts will be provided when any updated TA is received.
95. While the forecasted rail trip generation of 35 and 32 two-way trips for the respective AM and PM peak periods is accepted, without a proper assessment of impacts on Southall station, the conclusion that there is adequate capacity to meet the demand generated by the development is premature. The applicant must there undertake and submit a proper station impact assessment for further consideration.
96. A net bus demand of 115 and 95 two-way trips are forecasted in the AM and PM peak periods, respectively. Given the capacity issues on the local bus network, it is considered necessary to seek a financial contribution of £594,167 towards improvements, including but not limited to capacity enhancements.

### Travel plan, delivery and servicing and construction logistics plan

97. The submitted Travel Plan (TP) is broadly acceptable. The final TP and all agreed measures should be secured, enforced, monitored, and reviewed.
98. The provisions set out in the Delivery and Servicing Plan are broadly acceptable and the final plan should be secured by condition.
99. The submission and implementation of a Construction Logistics Plan (CLP), prepared in line with TfL's CLP Guidance, should be secured by condition for each phase of the development.

## **Sustainable development**

### Energy strategy

100. In line with London Plan 2021 Policy SI2, the applicant has set out how the development proposes to reduce carbon dioxide emissions in accordance with the energy hierarchy. Based on the information provided, the domestic element of the proposed development is estimated to achieve a reduction of 93 tonnes per annum (17%) and the non-domestic element of the proposed development is estimated to achieve a reduction of 11 tonnes per annum (12%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development. The applicant should note that the London Plan includes a target of a minimum 15% improvement on 2013 Building Regulations from energy efficiency which

applicants will be expected to meet. The applicant should therefore model additional energy efficiency measures to meet the EE target.

101. The scheme is proposing block-by-block heat networks supplied by energy centres in each block. The applicant should demonstrate that the number of energy centres has been minimised and that the proposed approach is supported by the local district heating stakeholders. A drawing showing the route of the heat networks linking all buildings/uses on the site should be provided alongside a drawing indicating the floor area, internal layout and location of the energy centres.
102. The applicant has provided a commitment that the development is designed to allow future connection to a district heating network, which is welcomed. This should include a single point of connection to the district heating network and drawings should be provided demonstrating space for heat exchangers in the energy centre/centres, a safe-guarded pipe route to the site boundary, and sufficient space in cross section for primary district heating pipes where proposed routes are through utility corridors.
103. In addition, further information is required on overheating strategy, ground source heat pumps and the PV potential. Detailed technical comments will be provided to the Council and the applicant separately. A carbon offset payment for both the domestic and non-domestic elements and “be seen” monitoring should be secured in the S106 agreement.

#### Whole life carbon

104. The applicant has provided a Whole Life Carbon Assessment (WLC) as required by London Plan Policy SI2, however, the applicant should provide assessment 1 and 2 tables in line with the GLA Whole Life-Cycle Carbon Assessment guidance. Detailed technical comments will be provided to the Council and the applicant separately. The Council should secure post construction monitoring by condition.

#### Circular economy

105. London Plan Policy D3 states that the principles of the circular economy should be taken into account in the design of development proposals in line with the circular economy hierarchy. London Plan Policy SI7 requires major applications to develop Circular Economy Statements. The draft Circular Economy Statements Guidance (October 2020) provides further information on how to prepare a Circular Economy Statement. A Circular Economy Statement has been provided in line with this policy and further information is required. The Council should secure post completion monitoring by condition. Detailed technical comments will be provided to the Council and the applicant separately.

## **Environmental issues**

### Urban greening

106. The proposed development presents a well-considered approach to integrating green infrastructure and urban greening across the masterplan, which includes green roofing and planting, and supports multifunctionality including biodiversity benefits. This is supported in accordance with London Plan Policy G1.
107. The proposed development is predominantly residential, and the applicant has calculated the proposed Urban Greening Factor (UGF) as 0.337, which is below the target set by London Plan Policy G5. The applicant has outlined that the inclusion of existing highways, which provides limited capacity to amend or improve the layout, reduces the UGF somewhat. Given the context and constraints of the development, the UGF is considered to be acceptable in this instance.
108. There are a number of existing trees on site. The arboricultural impact assessment (AIA) states that 25 individual and three groups of trees were surveyed on the site and that a number will need to be removed as part of the proposed development. The majority of trees to be removed are Category C, some of which may be suitable for translocation, and three Category B trees. The AIA states that the proposed development has been designed to retain existing trees where possible and that suitable new tree planting has been identified in the proposed landscape plan to provide an adequate level of mitigation for their loss, which is considered acceptable.
109. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. The proposal would achieve a biodiversity net gain of 380% across the site, which is supported. The Council should appropriately secure relevant biodiversity measures proposed for this scheme.

### Sustainable drainage and flood risk

110. The Flood Risk Assessment provided for the proposed development generally complies with London Plan Policy SI.12. The surface water drainage strategy does not give appropriate regard to the greenfield runoff rate and SuDS, and insufficient information has been provided to appropriately assess the calculations and drainage drawing. As such the proposed drainage strategy does not fully comply with London Plan Policy SI.13. An assessment of exceedance flood flow routes above the 100 year event plus 40% climate change should also be provided.
111. The proposed development generally meets the requirements of London Plan Policy SI.5 in terms of water consumption. The applicant should also include water harvesting and reuse to reduce consumption of water across the site. This can be integrated with the surface water drainage system to provide a dual benefit. Detailed technical comments will be provided to the Council and the applicant separately.

## Air quality

112. In accordance with London Plan Policy SI1, an air quality assessment has been provided. Policy SI1 states that this should take an Air Quality Neutral approach.
113. Additional justification should be provided to demonstrate that there will be no adverse impacts on air quality at existing sensitive receptors during operation of the development. An assessment of construction traffic impacts on air quality at existing sensitive receptors should be undertaken to ensure no adverse impacts, and any suitable mitigation measures should be appropriately secured. An Air Quality and Dust Management Plan (AQDMP) and London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards should be appropriately secured. Full details have been provided to the applicant and the Council.

## **Local planning authority's position**

114. Ealing planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

## **Legal considerations**

115. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## **Financial considerations**

116. There are no financial considerations at this stage.

## Conclusion

117. London Plan policies on industrial land, opportunity areas, community/night time economy; housing; affordable housing; heritage; design; inclusive design; sustainable infrastructure; green infrastructure; and transport are relevant to this application. Having regard to these policies the application complies with some of these policies but not with others as per the schedule below:

- **Land use principle:** The residential-led redevelopment of this brownfield industrial site to provide commercial and residential use is acceptable in land use terms. However, further information is required in relation to the potential loss and re-provision of the community/night-time uses.
- **Housing:** 50% affordable housing by habitable room is proposed with a split of 62% Affordable Rent/ 38% Shared Ownership units. This offer meets the Fast Track route requirements and is supported. Early stage review mechanism and the affordability of the units must be secured. Appropriate contributions towards playspace provision should be secured.
- **Urban design:** The site is not identified in the development plan as suitable for tall buildings and, as such, the proposal does not comply with London Plan Policy D9.B. The issue of non-compliance will be considered at the Mayor's decision-making stage having regard to the material considerations of the case, and the public benefits of the proposed development. The proposed layout of the scheme is broadly supported. Appropriate mitigation measures in relation to agent of change principles, public access to the open space and a revised fire strategy should be secured.
- **Heritage:** The proposal would result in less than substantial harm to the setting of the Grade II\* Manor House and Grade II War Memorial and would result in loss of a non-designated heritage asset. Whilst it is possible that public benefits (including provision of affordable housing and public realm improvements) could outweigh the identified harm, this balance will be considered fully at the Mayor's decision making stage.
- **Transport:** Further information and clarifications are required in respect of Healthy Streets, trip generation and necessary mitigations to promote active travel. The car parking provision should be removed in line with the London Plan objectives of car free development. Cycle parking should comply with LCDS and the overall quantum should be appropriately secured. A Travel Plan, full Delivery and Servicing Plan, and Construction Logistics Plan, Parking Management Plan, contribution towards bus service improvements and CPZ permits should be secured.
- **Sustainable infrastructure and environmental issues:** Further information is required on energy with respect to energy efficiency, renewable energy, overheating and energy monitoring. Further information in relation to WLC, circular economy, sustainable drainage, water and air quality is required.



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