

London Borough of Ealing
Development Strategy Examination in Public

Submission Statement for Matter 9
(Protecting and Enhancing Ealing's Green and Open Space)

Question 6

By

Neil Kedar on behalf of Corporate Finance Property Development, Transport for London

(Personal Objector Reference: 13, Representations No 62 and 63)

10 October 2011

Introduction

- 1.1 This Submission statement relates to Corporate Finance Property Development (hereafter CFPD) Transport for London (TfL) representations 62 and 63 on the submission version of the London Borough of Ealing's (hereafter LB Ealing) Development Strategy. This Submission specifically relates to the 13 TfL owned sites along the A40 corridor. Please note that this statement represents the views of officers in CFPD Transport for London in its capacity as landowner only and should not be taken as the TfL corporate response or an indication of any subsequent Mayoral/ Greater London Authority decision.
- 1.2 In November 2010, CFPD submitted a Representation to the Development Strategy Final Proposals and the Development Sites Development Plan Document (DPD): Initial Proposals. This statement amplifies the original representation made by CFPD on the Development Strategy. This statement has been structured to respond to the matters and issues raised by the Inspector during the Pre-Hearing Meeting held on 15 September 2011, more specifically Matter 9 question 6.
- 1.3 This statement does not seek to repeat existing information already presented to the Inspector, but draws on additional information since the submission of the CFPD'S Representation to the Development Strategy to support the production of a policy which is both (i) justified and (ii) effective.

Background

- 1.4 A summary of the planning background and history is set out in **Annex 1**.
- 1.5 Since submission of the Representations, TfL commissioned a team (comprising Landolt Brown as master planners and AECOM to provide specialist technical advice on environmental matters) to develop a draft Masterplan exploring the constraints, opportunities, planning requirements and subsequent development parameters associated with all 13 TfL owned sites along the A40. The draft Masterplan, of which extracts are set out in **Annex 2** concluded a 25m green corridor could not be delivered in its current form without (i) compromising the quality of the built development or (ii) given the narrow depths of the sites, result in sterilisation of land (refer to extract page numbers 15, 27 and 28 of Annex 2). The draft Masterplan was finalised in April 2011.
- 1.6 Within the last 18 months, CFPD has carried out extensive engagement with LB Ealing, Councillors and community groups to understand, explain and develop the principles set out in the draft Masterplan. On the 2 November 2010, CFPD and LB Ealing met with local residents of the A40 to explain the constraints of the 'current' 25m green corridor and the 'benefits' of a reduced green corridor. In advance of that meeting, LB Ealing produced a briefing note supporting the need to revise current planning policy. The Briefing Note and Minutes are set out in **Annex 3**.
- 1.7 On 24 May 2011, CFPD attended a Pre-Application Meeting with LB Ealing Officers whereby the draft Masterplan was presented and clarification was sought on the provision of a reduced green corridor of approximately 15m in width. On 14 June 2011, the Council

issued a Pre-Application Advice Letter advising that a 15m corridor was ‘in principle’ acceptable. A copy of that Letter is set out in **Annex 4** of this statement.

- 1.8 Development on part of the sites is absolutely necessary to fund the deliverability of a green corridor, therefore, it is necessary to ensure Policies 3.1 and 5.3 of the Development Strategy and accompanying Proposals Plans and Maps are effective in terms of (i) flexibility to provide a green corridor whilst also delivering a quality development and (ii) deliverable such that the green corridor can be realised. The overall benefits (both local and regional) of effective Policies include:
- the delivery of a significant number of quality housing units on undervalued derelict brownfield land, whilst also contributing to wider regeneration of the area;
 - the delivery of a valuable and high quality green corridor along the A40 to both residents and commuter traffic;
 - financial receipts will reduce the need for public sector funding whilst enabling necessary investment in London’s transport network; and
 - wider environmental benefits to existing residents (eg noise and air).

Response to Matter 9 Question 6

- 1.9 Our response to Matter 9 question 6 seeks to ensure Policies 3.1 and 5.3 are:
- (i) **Effective** in terms of both flexibility and deliverability, enabling the delivery of a green corridor combined with a sustainable development; and
 - (ii) **Justified** in terms of the provision of a reduced green corridor which enables development, is considered to be the most suitable strategy for the sites when considered against the reasonable alternative of undeveloped brownfield land.
- 1.10 CFPD welcome the proposed amendments to Policy 3.1 and Policy 5.3 set out in Submission Document EAL3 ‘Minor and Technical Changes’. CFPD considers the text provides some, albeit not complete, clarification to the Policies and further explanatory text is required.
- 1.11 Additional explanatory text to Policy 5.3 is recommended by LB Ealing to the Inspector for consideration in Submission Document EAL12b Version 2, of which we wholly support. We consider the proposed amendment provides the necessary textual clarification which acknowledges the fundamental importance of enabling development on the sites to permit the delivery of a meaningful green corridor. Therefore, the inclusion of this text is considered essential and necessary to ensure the Policy is effective and justified in line with paragraph 4.52 of Planning Policy Statement 12.
- 1.12 CFPD welcome the illustrative change proposed to Map 8 of the Development Strategy set out in Submission Document EAL12b Version 2. This proposed amendment clearly distinguishes the spatial scope of the 13 TfL sites from the general green corridors in Ealing which is in line with the proposed amendments set out in EAL 3 ‘Minor and Technical Changes’ and EAL12B Version 2.
- 1.13 In line with para 4.5 of Planning Policy Statement 12 which notes “ it is essential that the Core Strategy makes clear spatial choices about where development should go”. The Proposal Plan which accompanies the Development Strategy is contrary to this position,

designating all 13 sites within the 'Green Corridor'; an extract of the Proposal Plan is set out in **Annex 5**. LB Ealing has not recommended amendments to, or removal of this designation within Submission Document EAL4 'An Atlas of Proposed Changes to the Adopted UDP Proposals Map'. To ensure consistency with the Policies and Maps 2, 4 and an amended Map 8 of the Development Strategy, in addition to plans contained within the Development Sites DPD, it is recommended the Proposal Plan is amended to reflect the delivery of a green corridor in conjunction with appropriate development. The recommended proposed amendments are:

- (i) an illustrative change to the designation, an indication of this designation is set out in **Annex 5**.
- (ii) amendment to the text in the key to state 'green corridor (unimplemented, and to be implemented through enabling development)'

On the 7 October, LB Ealing advised that amendments would be proposed to the Inspector regarding changes to the Proposal Plan to reflect this position, this includes visual illustration and explanatory text in the key. At the time of writing this, CFPD has not seen these proposed changes. It is necessary that these amendments are taken on board to ensure consistency between all relevant DPDs leading to a deliverable solution.

- 1.14 Should the recommendations presented by LB Ealing and amendment to the Proposal Plan as set out in para 1.13 be taken on board, we would consider that the Development Strategy would be both effective (and therefore deliverable) and justified and subsequently would result in meeting the tests of soundness as set out in Planning Policy Statement 12.

Updated Planning History

Updated Planning History

CFPD has and currently is actively promoting the development of all 13 sites along the A40 corridor to deliver significant economic and regeneration benefits in the LB Ealing. However, due to policy constraints, the promotion of such development has been unsuccessful. The chronology of events is set out as follows.

A number of residential and commercial properties were acquired and demolished by the Highways Agency in order to accommodate the A40 road widening scheme.

In 1997, the Government announced the cancellation of the scheme and as result, all of the sites remained vacant with hoarding around the perimeter of the sites. In 2000, TfL inherited all thirteen sites between Gypsy Corner and Western Circus in the LB Ealing which total approx 4.8ha in size. The sites are currently vacant and boarded-up.

In 2004, the UDP was adopted. Policy 3.2 (Green Corridors and the Waterways Networks) of the UDP relates to the green corridor and advises that normally, development within the green corridor or which may affect the setting or encroach the green corridor will not be permitted. In 2004, the Borough adopted Supplementary Planning Guidance (SPG) 22: Green Corridor Strategy, which supported policy 3.2 (Green Corridors and the Waterways Networks) of the UDP. Within the document, the policy makes specific reference to the provision of a green corridor of 25m in width.

In 2004, TfL submitted a planning application (P/2004/4868) for a mixed use development scheme for sites 1 and 2 for 6 flats and 23 town houses and a 15m green corridor reducing to 6m on some parts of the site. The application was refused on a number of grounds, in particular the proximity to the A40 green corridor. An appeal was lodged but was later dismissed, however the Inspector advised:

“Whilst I have concluded that many objections to the development could be satisfactorily resolved, the determining factor is the contribution that the development would make to the aims and objectives of the green corridor provisions in the UDP. It would fail in the key requirements to transform this section of the A40 into a green corridor through substantial tree planting and landscaping.

In 2007, a subsequent planning application (P/2007/3456) for sites 1 and 2 was submitted and addressed a number of issues raised in the previous application and provided a 20m green corridor. The Planning Officer recommended approval, however the decision was overturned at the Planning Committee and refusal was granted based on the green corridor.

Since January 2010 to April 2011, CFPD has carried out extensive engagement with LB Ealing to explore the provision of a green corridor whilst also accommodating residential and commercial development on all 13 sites. In deriving the development principles, a number of issues and development parameters were explored, this included the delivery of a reduced green corridor of some 15m in depth. Given the constraints associated with the sites, there was an acceptance by LB Ealing, that a green corridor in current policy form, was undeliverable.

In November 2010, CFPD TfL submitted a representation to the Development Strategy Final Proposals Document and Development Sites Development Plan Document Initial Proposals regarding the policies proposed, the key objective was to ensure the policy is flexible to enable a development which is deliverable on the sites.

On 24 May 2011, CFPD attended a Pre-Application meeting to formalise the principles set out in the draft Masterplan, in particular the provision of a 15m corridor. On 14 June 2011, LB Ealing issued a Pre-Application Advice Letter advising that a 15m corridor is 'in principle' acceptable.

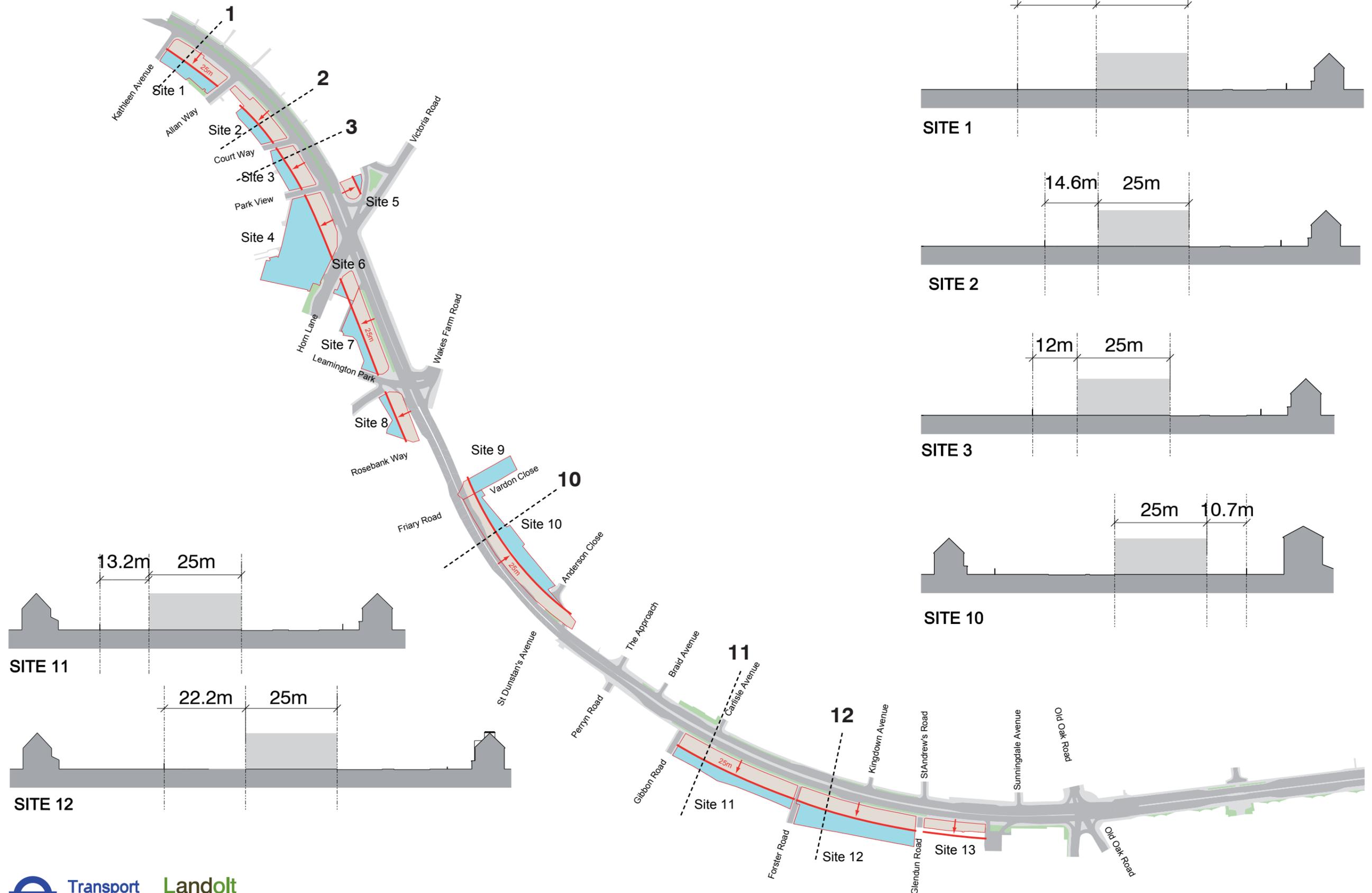
Additional meetings leading up to Examination in Public have taken place with LB Ealing.

Annex 2

Extracts from the Draft Masterplan

4.0 Primary Constraints

4.1 Planning Policy: 25m Green Corridor



6.0 Balancing a Green Corridor with High Quality Housing

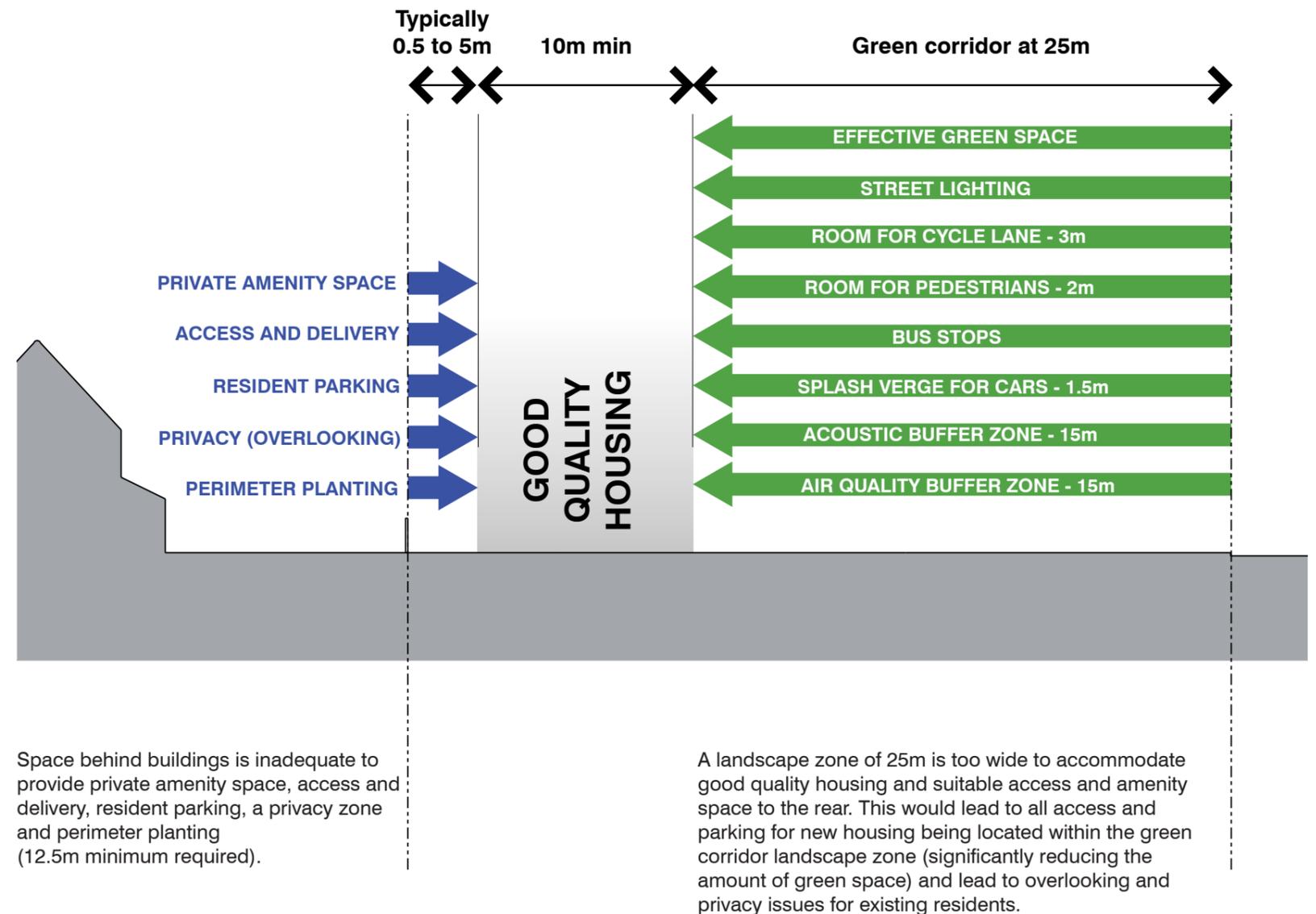
6.2 The Impact of Ealing's 25m Proposed Green Corridor

For the majority of the development sites, which range between 35m and 40m in depth, the imposition of a 25m wide corridor will seriously compromise the quality of new development and is likely to render the sites commercially un-viable.

Assuming even a minimum building depth of 10m, the residual space behind new housing would only be between 0.5 and 5m. This is clearly inadequate to provide circulation and amenity space and would obviate the potential to provide appropriate visual screening between new housing and the gardens of existing residential properties. This would also force all new parking and vehicular circulation onto the road side of new development, eroding the area and environmental quality of the green corridor itself.

In this instance, the green corridor would be provided at the expense of existing and new residents who would have inadequate amenity space and lack privacy. It would lead to developments only suited to smaller sized, flatted accommodation.

Our masterplan therefore concludes that strict adherence to the 25m corridor is at odds with the desire to promote high quality residential development incorporating a sustainable balance of residential unit sizes, which in turn could encourage well integrated and stable residential communities.



6.0 Balancing a Green Corridor with High Quality Housing

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6.3 Quantifying Minimum Space Requirements

In order to provide a 'minimum' development depth from the back edge of the green corridor, the space impact of a number of development requirements need to be quantified. These can be subdivided as follows:

1. Support zone to the rear of development

- A privacy margin of 1.5m to allow for planting of screening trees between new housing and existing residential property
- A minimum road width of 4.5m to allow two small vehicles to pass, or to provide a single-track roadway for access and services/emergency vehicles with allocated passing places.
- A 5.5m zone to accommodate low levels of residential parking (disabled parking and car clubs are likely to be a planning requirement regardless of private parking standards), areas for refuse and recycling storage, with private amenity space at ground floor level interspersed with parking.

Overall, the zone at the rear of the properties needs to be a minimum of 11.5m, though a wider zone where possible, would allow for more generous amenity space for housing units in particular and 15m would be preferable.

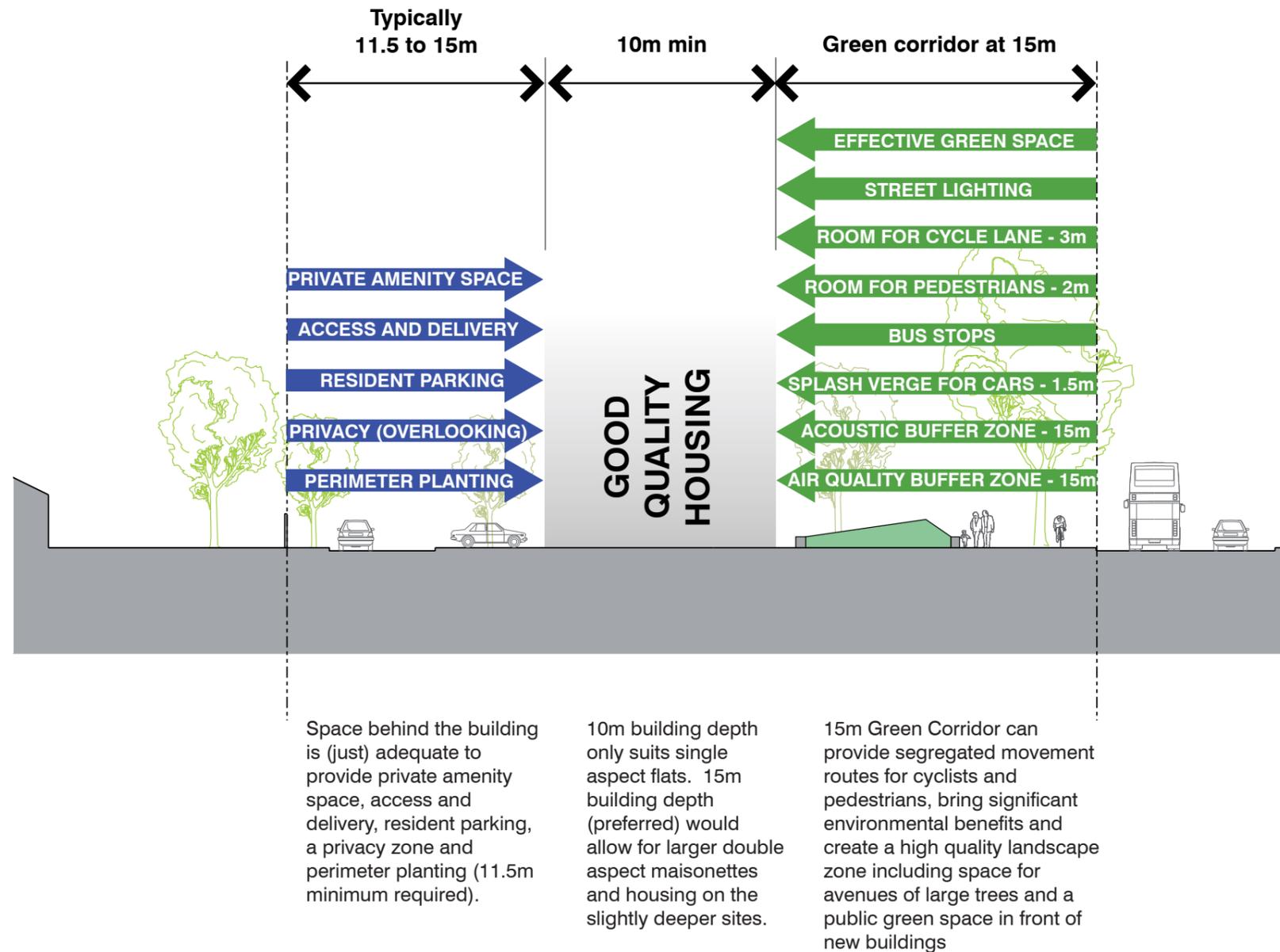
2. Development footprint

Due to the challenges of building in close proximity to the A40, it is considered essential to allow a development footprint of sufficient width to incorporate buffering through winter gardens and access decks, in order to avoid overly defensive 'punched-opening' walls facing the highway. Recent developments immediately to the west of Site 13 show the detrimental impact of this, where bathrooms and kitchens are grouped on the road frontage with tiny windows facing the street. The adoption of a 'minimum' development zone (typically 8m) is almost certain, therefore, to encourage this type of poor quality housing.

To enable more innovative, high quality housing types, a minimum development depth of 10m should be established, though will still only suit single-aspect, smaller residential units. Where site width allows, it is therefore considered advisable to increase the depth to 15m to accommodate townhouses or large 4 and 5 bed flatted accommodation with habitable rooms facing both sites of the development. A range of appropriate housing typologies is illustrated in section 6.4.

3. Proposed green corridor width

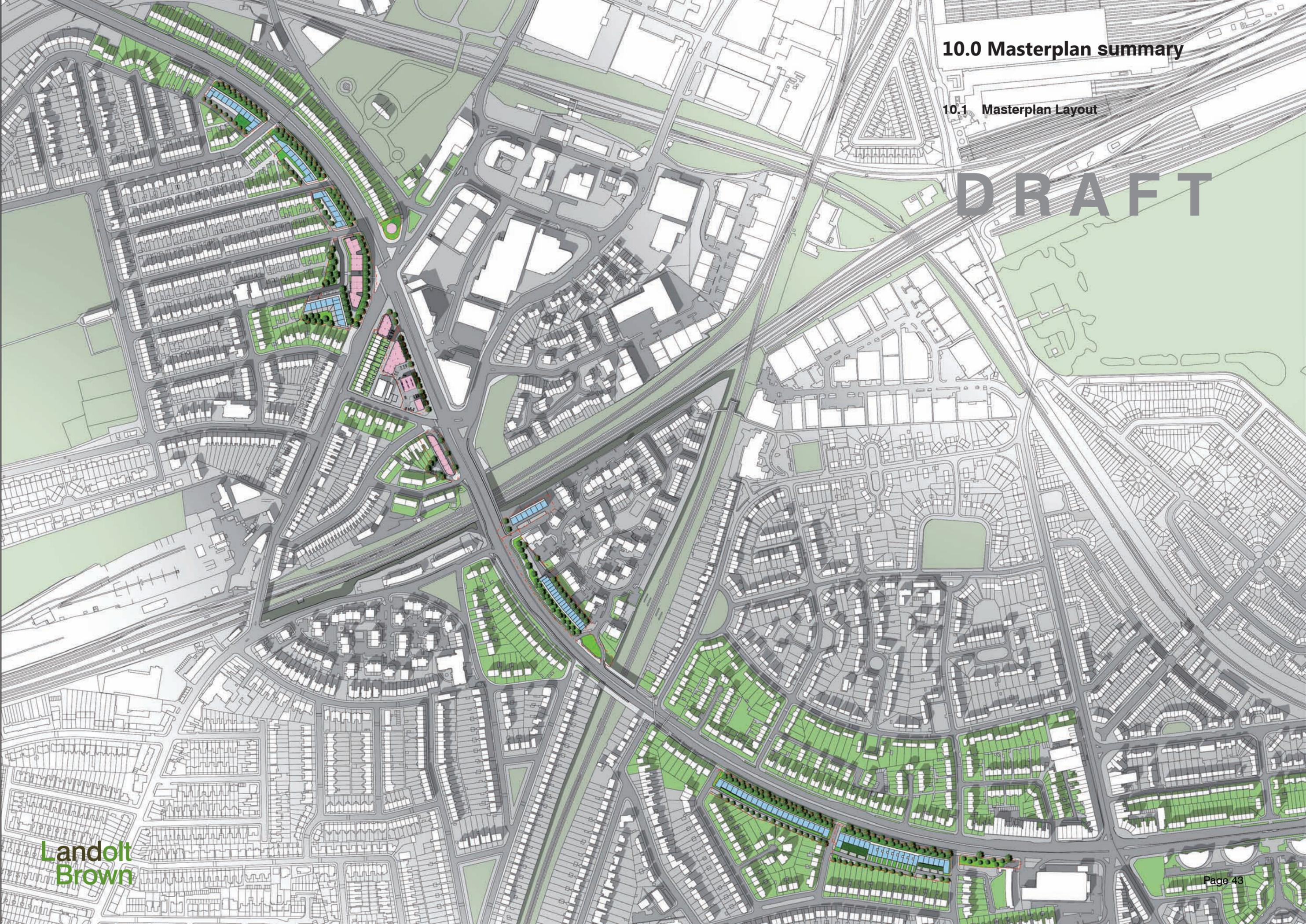
In order to provide the minimum advisable support zone and development footprints, a minimum overall development depth of 20.5m is required, though a wider zone of up to 30m, where possible, would allow the incorporation of more innovative building types best suited to family housing. On the narrowest of sites, this 20.5 minimum zone results in a green corridor of 15m in depth. While less than currently proposed by Ealing, this could still provide a high quality landscape environment along the A40 with sufficient space for kerb-side planting, segregated cycle and pedestrian routes and a 9m+ soft landscaping strip in front of the new developments. In order to encourage a rich mix of housing types with appropriate areas of private amenity space, this corridor width should remain consistent along the wider Parcel 1 and 3 sites, allowing these deeper sites to accommodate larger housing units with adequate private amenity space.



10.0 Masterplan summary

10.1 Masterplan Layout

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Annex 3
Briefing Note and Meeting Minutes, 2 November 2010

A40 Green Corridor Briefing Note A

The Issue

Consideration needs to be given to how the Council's Green Corridor planning policy in relation to the A40 Acton Green Corridor area is applied to future development on the A40 sites.

There is currently no green corridor in this area. The Council does not own the land and there is no realistic prospect of a green corridor being created without some development to pay for it.

There are 13 sites owned by TfL, who want to develop housing and commercial uses on the sites and through this enabling development deliver a green corridor.

There is some opposition to a reduction in the 25m "green corridor" line identified in current planning policy. However sticking rigidly to the 25m leaves most of the sites with little space left for any development.

The Council, TfL and local residents need to develop a clear strategy and master plan setting out clear design and development principles and reach some consensus on how the policy is applied, otherwise these sites are likely to remain as they are or TfL could sell the sites and each site will come forward individually for planning permission.

1. What is the Green Corridor?

Ealing has a network of Green Corridors across the borough. The green corridors provide important links between networks of strategic open spaces providing environmental, recreational and infrastructure facilities. The green corridors comprise roads, railways, walking and cycle routes, and corridors for the movement of wildlife.

2. Existing planning policy on Green Corridors

The current Unitary Development Plan 2004 (UDP) sets out the following policy in relation to the Green Corridor:

3.2 The Council will not normally permit development within Green Corridors, and development adjoining or affecting the setting of these corridors will be expected to enhance their visual, nature conservation and recreational qualities, and their visual and environmental continuity.

The UDP map shows a Green Corridor of 25m wide in the Acton area. This policy is largely being carried forward into the emerging Local Development

Framework and the Green Corridor boundary currently remains unchanged from that defined in the 2004 UDP.

All 13 TfL sites are also designated as Development Sites in the current Development sites Document. For the larger sites, the Development Site boundaries also encompass land outside of the defined Green Corridor.

Both the adopted UDP policy and the emerging LDF documents recognise the unique circumstances that exist with regard to the Acton A40 part of the Green Corridor network, in that the Green Corridor is still to be delivered. In this regard whilst UDP policy 3.2 establishes a presumption against built development within the Green Corridor, the supporting text acknowledges that in the case of the A40 Green Corridor, which the sites form part of, there may be limited opportunities for development. This flexibility in the text was included at the recommendation of the Planning Inspector who oversaw the Inquiry into the UDP. The Inspector recognised that as the land was outside the ownership of the Council, the delivery of the Green Corridor in the form of an enhanced landscape strip, improved cycleway/pedestrian route, and an improved noise environment will most likely be dependent on and enabled by some development on parts of the sites defined as Green Corridor. The Inspector agreed that development may in some instances need to encroach onto land defined as Green Corridor.

The Inspectors who presided over the two planning appeals for sites 4 and sites 1 and 2 also acknowledged the need to apply some flexibility if the Green Corridor objectives are to be delivered. Importantly, it was also agreed by the Inspector that the delivery of the Green Corridor objectives was not contingent on the protection of the full 25m deep corridor. Built form, subject to its design, could also function as a noise barrier benefiting residents to the rear.

There is therefore some flexibility already built into existing planning policies. However there is a lack of clarity and agreement between all parties (TfL, Council, residents) in terms of interpreting this flexibility.

3. Current work by TfL

TfL wish to move forward with disposing of the sites for development and therefore would like to work with the Council to develop a master plan for the sites. TfL have appointed architects Landolt Brown to develop some ideas and drawings showing how a green corridor could be delivered alongside residential and commercial development. In their view the minimum width of the corridor would be 15 metres. They have also sketched how residential blocks might work to be dual aspect but minimise noise for residents.

This work will be presented to representatives from residents associations at the meeting on 2nd November.

4. Next Steps

A masterplan could help to provide some clarity about what will be acceptable in development terms particularly in relation to:

- Uses within the Green Corridor space and landscaping
- Height of development
- Massing/density of development
- Landscaping principles
- Amenity space
- Access roads and car parking
- Mix of uses
- Noise and air quality issues
- S106 requirements
- Affordable housing

TfL have been asked to consider the development of the sites in the broader context of their overall strategy for the A40 in terms of improving the environment, air quality, noise, cycling, walking, traffic flows, etc.

Having worked up initial concepts/options for a masterplan, TfL have indicated that they would like to engage with local residents through a series of consultation events/workshops.

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Green Corridor Briefing Note B

A40 Acton Green Corridor Sites

Policy Background - UDP

Policy 3.2 'Green Corridors and the Waterway Network' of the adopted 2004 UDP, provides the policy basis for Green Corridors in the borough. There are three elements to this policy. The first relates to Green Corridors generally, whilst the second and third elements are relevant to the waterway network, which is also designated as Green Corridor in the borough. With regard to the TfL sites, which do not form part of the Borough's Waterway Network, only the first element is relevant. In this regard paragraph 1 of policy 3.2 is relevant and states as follows:

3.2 Green Corridors and the Waterway Network

1. 'The Council will not normally permit development within Green Corridors, and development adjoining or affecting the setting of these corridors will be expected to enhance their visual, nature conservation and recreational qualities, and their visual and environmental continuity.'

Extract from the supporting text to Policy 3.2:

Consequently, there will be limited opportunities for development in Green Corridors, although limited opportunities within the newly defined A40 Acton Green Corridor in the eastern part of the borough will be assessed in the context of proposed revised Supplementary Guidance, and development adjoining these corridors will be expected to enhance their quality and continuity.

This policy effectively establishes a presumption against built development within the Green Corridor and seeks improvements to their visual, nature conservation and recreational quality. Any development adjoining or affecting the setting of a Green Corridor should also enhance the qualities of the Green Corridor and its visual and environmental continuity. Whilst the policy establishes that there will be little scope for development in Green Corridors, the supporting text acknowledges that in the case of the A40 Acton Green Corridor, which the sites forms part of, there may be limited opportunities for development. Such opportunities will however be expected to comply with the objectives of SPG 22 'A40 Acton: Green Corridor Strategy'.

Background to the above policy wording - UDP Inquiry

At first deposit stage of the UDP (1st February 02 – 18th March 02) the Council received representations to policy 3.2 from GLA on behalf of TfL (appendix 10 – extract from GLA's response). The GLA requested that the policy should be amended to distinguish between 'existing' and 'proposed' Green Corridors. Following the inquiry (in May – September 2003) into the UDP it was agreed that further changes should be made to this policy to clarify what 'normally' meant in the context of this policy. The Inspector for the UDP Inquiry commented on this in his report (December 2003) as follows:

The Council accepts that, in principle, and in a limited number of locations, there may be potential for new built development within the newly proposed CG along the eastern section of the A40. The policy contains the word 'normally', implying that new buildings may be permitted in exceptional circumstances. Notwithstanding, I share the concerns that without further specific reference to the acknowledged opportunities of some sites alongside the A40 their development potential may best be curtailed and at worst precluded. In my view, this would be contrary to the objective of making the best use of land in all possible circumstances. However, any change to the policy itself risks

weakening its implementation in relation to other GC's and the waterway network. The Council points to the relevant SG for the A40 corridor, which is currently being updated, as the solution to this difficulty but I note that there is no reference to it in either the policy wording, the supporting text, or even as a cross reference, unlike relevant documents.

Accordingly, I consider this to be an instance where a direct mention of SG is essential within the plan, both as a cross reference and by specific wording within the supporting text. Given that the latter part of the text on pages 47 and 48 deals largely with rivers and waterways, I suggest that this should be made in the first paragraph after the policy wording itself. In my view, the following might reasonably be added to the third sentence after the words 'Green Corridors' as follows: 'although the limited opportunities within the newly defined A40 green corridor in the eastern part of the borough will be assessed in the context of proposed revised SG'. The next sentence could then start with 'Development adjoining...'. This addition would reflect the Council's true position in this matter, as well as going some way to address the objection lodged by the GLA, without undermining the overall objectives of the GC policy elsewhere in the borough. Such a change would also avoid the need to amend the boundaries of the CG shown on the Proposals Map without the benefit of the detailed work implicit in the preparation of the revised SG.'

The supporting text to the policy (3.2) was subsequently amended as advised by the Inspector above. This wording appears in the adopted October 2004 UDP.

Planning History

To date applications have been submitted for sites 1 & 2 and 4 (see site location plan). These applications were effectively seen as pilot schemes in order to establish an acceptable approach which could be replicated across the other sites – these sites were seen as forerunners for how the policy would be applied across all the other sites.

P/2004/2967

Proposal – Bus depot

Land at junction of Horn Lane and Western Avenue (Site 4 (includes site 3 as part of proposed phase 2 of scheme))

Planning application refused on Green Corridor grounds

Public Inquiry held in April – May 2006

The Inspector upheld the Council's decision concluding that the appeal scheme would not only provide insufficient landscaping to properly contribute to the creation of a green corridor, but would also seriously jeopardise the possibility of achieving such a proposal.

Extract from the Inspector Report:

'8 The basis of the 'green corridor' is suggested as a 25m strip along the carriageway, of which some 18m to 20m might consist of landscaping, planting and mounding. But, this is not a hard and fast requirement. The Plan recognises the need to make good use of vacant and underused sites (as recommended by the UDP Inspector) and it must accommodate specific designations, such as that for 'employment' on the appeal site'

'10 I fully accept that the green part of the proposed 'green corridor' need not be 18m to 20m wide everywhere. But, it is clearly the intention of the UDP and SPG 22, when read together, that it should be substantial enough to effect a significant transformation of the present dismal roadside scene. That

transformation is not to be based on comparisons with what the site is like now, or what it was like in the past or on the cacophony created opposite.

P/2004/4868

Proposal – Redevelopment comprising 6 x 2 bed flats and 23 x three bedroom townhouses (Outline)

Land adjacent to Allan Way/Western Avenue (Sites 1 & 2)

Planning application refused on Green Corridor and Noise grounds

Public Inquiry held in June 2006

The Inspector agreed that the appeal should be dismissed, concluding that the development as proposed would in its key requirement transform this section of the A40 into a green corridor through substantial planting and landscaping.

P/2007/3256

Proposal –

Land adjacent to Allan Way/Western Avenue (Sites 1 & 2)

Following considerable discussions with the applicant (TfL) following the appeal decision the scheme for sites 1 and 2 was modified to address concerns raised in respect of the establishment of a green corridor. Under the earlier appeal scheme the extent of the Green Corridor (incorporating the footpaths, cycleway and landscaping) varied from between 12.5-27m. After omitting the circulation corridor the landscaping measured 1.8m-13.5m, which was considered unsatisfactory in transforming this section of the A40 into a Green Corridor. As part of the scheme redesign, the rear access roads were removed, although it was noted that pedestrian access to the rear of these properties has been retained on the basis of a 1.6m wide path. The rear mews (for cars) were also removed, and the parking relocated to the front of the site. This allowed the building line of the properties to be moved back with the average width of the Green Corridor increasing to over 20m (an increase of approx. 5-6m as an average over the earlier appeal scheme). The depth of the corridor at the junctions was also wider creating the illusion of a wider corridor. It is noted too that there was also a balance to be struck between achieving adequate private amenity space to the rear and the depth of the green corridor achieved. From an officer position at least the revised scheme was considered a marked improvement over the appeal proposal. Accordingly the application was recommended for approval. The Committee however overturned this recommendation refusing the application on grounds of inadequate green corridor.

LDF – Development Strategy Final Proposals – September 2010

Final proposal 3.1

Realising the potential of the A40 Corridor & Park Royal

- (a) By 2026, seek the development of 3,000 additional homes (25 per cent of the boroughs' net gain in housing).**
- (b) To achieve an appropriate balance within the corridor between localities for regeneration and those localities which merit conservation of the built and natural environment.**
- (c) To enhance greening opportunities along the A40 corridor, develop two cycle hubs in Greenford and Northolt and create new cycle/pedestrian routes parallel to the A40 but separated by trees and shrubs where opportunities exist.**

- (d) To further explore opportunities for creating a district energy network at Southern Gateway and Greenford town centre.**
- (e) To further explore opportunities to reduce exposure to air and noise pollution for existing residents.**

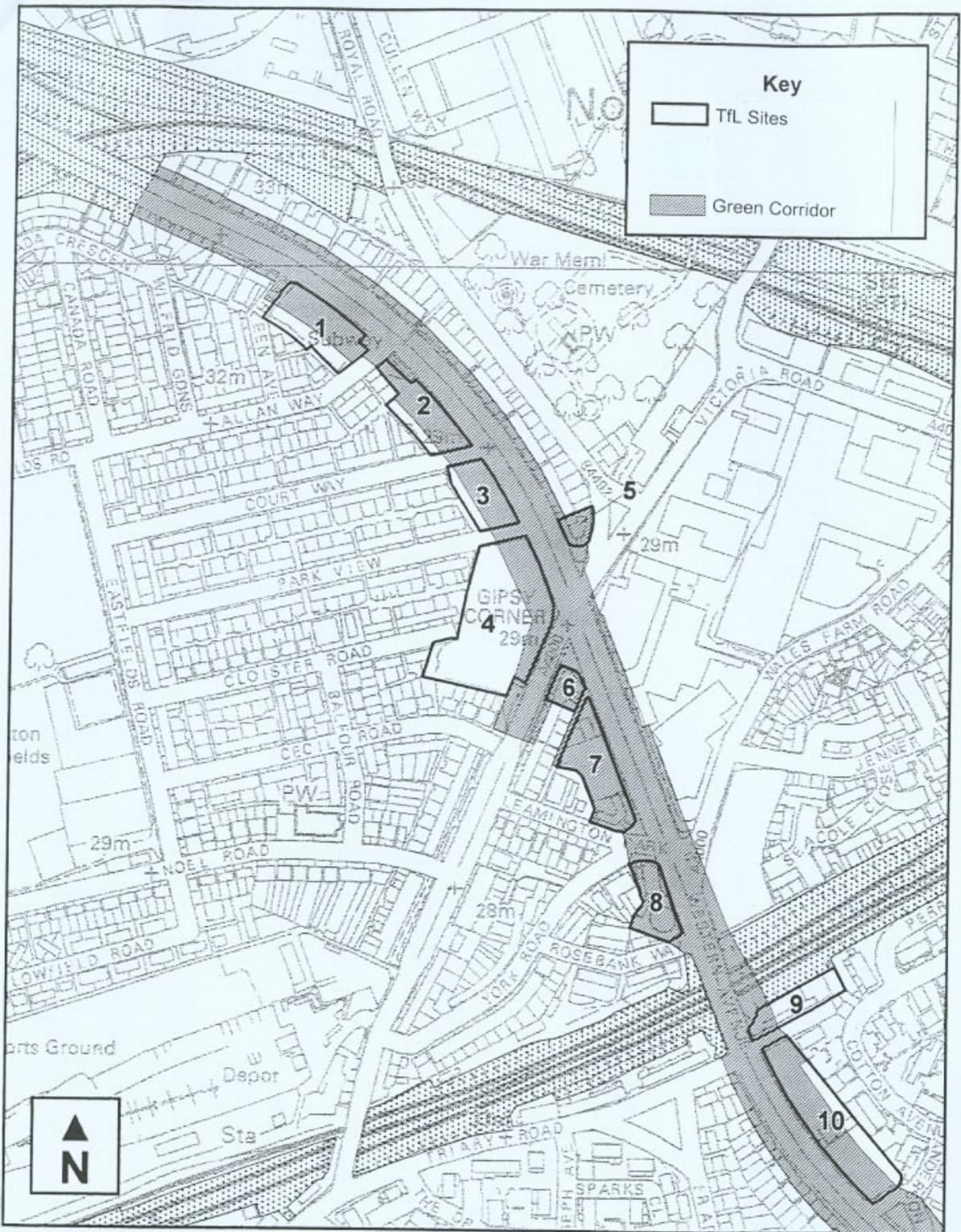
Final Proposal 5.3

Protect and Enhance Green Corridors

The council in seeking to protect and promote the network of Green Corridors in the borough will promote the following proposals for enhancement:

- (c) Road Network: protection and enhancement of landscaped corridors, including additional planting where possible. Where feasible footpaths and cycle paths to be incorporated within the corridor, with landscaping providing a buffer between the road edge and paths**

A40 Acton: Green Corridor

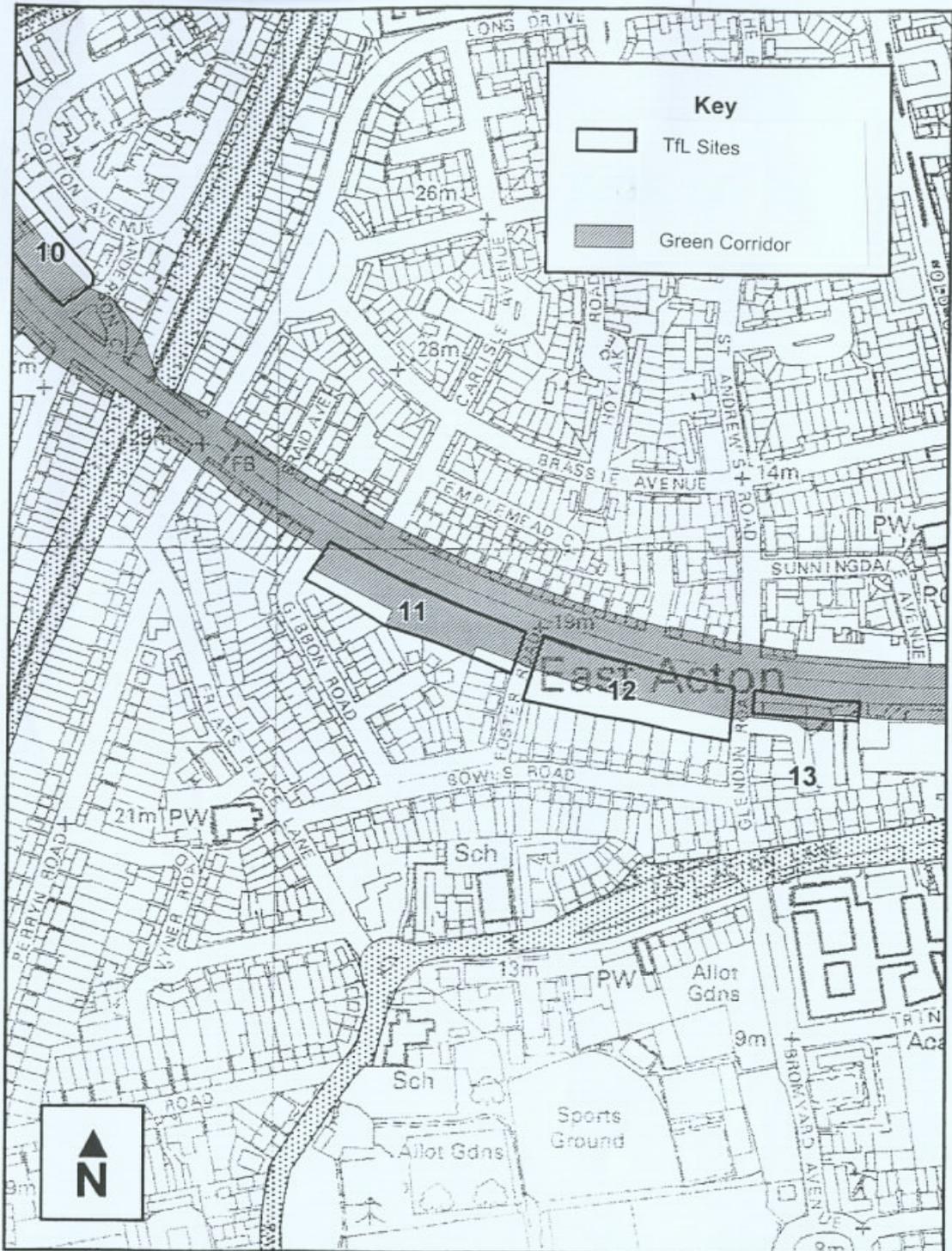


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A40 Acton: Green Corridor



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Minutes

A40 Green Corridor Working Party Meeting

Tuesday 2nd November 6.30pm

Holiday Inn Express Hotel, North Acton

Attendees

Cllr Crawford (KC) - Chair

Cllr Said (AS)

Nilam Popat (NP) – Ealing Council

Ian Weake (IW) – Ealing Council

Jonathan Cornelius (JC) – TfL

Adam Brown (AB) – Landolt and Brown

Esme Yuill (EY) – TfL (Communications)

Marcus Iglauer (MI) – Landolt and Brown

Murray Smith (MS) – Untitled Practice (Landscape Architect)

Siobhan Martin (SM)

Alan Cartwright (AC)

Bill Davidson (BD)

Vlod Barchuk (VB)

Christopher Bell (CB)

Sheela Selvajothy (SS)

Charles Gallichan (CG)

Apologies – Cllr Taylor

- Lucy Taylor

1. Welcome and Introductions

The chair (KC) opened the meeting, welcoming all those in attendance. Apologies were noted.

2. Overview

NP provided an overview of the position to date. See briefing note A.

IW provided an overview of the Planning Policy position. This overview covered the current policy position and the emerging position as regards the LDF. See briefing note B.

3. Presentation

AB presented TfL's current thinking around proposals for these sites, noting that these are still very much work in progress. See slides for further detail.

From the outset, AB confirmed that there were no plans for the future widening of the A40. AB advised that the Landscape Strategy is the starting point for any proposal, and identified key development principles which have informed/shaped the proposals to date.

JC advised that TfL are unlikely to be able bring forward all of the landscape measures proposed in the masterplan, particularly those located outside of the development site boundaries. TfL will need to work closely with the Council and other partners to bring forward a wider programme of landscaping. TfL 'Property' are already working closely with colleagues in their Street Planting team to see what opportunities may exist to provide landscaping along the central reservation. EY advised that further funding could be available through the Local Implementation Plan (LIP), or from S106. S106 could be pooled to provide some of the additional linkages in terms of the landscaping strategy.

4. Q & A

SM asked TfL for confirmation as to whether their proposals for development increased the impact of noise and air pollution to those residents living on the opposite side of the Western Avenue in terms of reflected (bounce back) pollution off the proposed developments. AB confirmed that they didn't have this information and they would follow this up.

SM noted that £200,000 was secured through a S106 agreement from the BBC Costume store development to provide for a cycle route for students on the A40 Green Corridor. East Acton Ward Councillors asked for this money to be ring fenced at the relevant planning committee meeting. The committee were informed that TfL had advised that they would be implementing the cycle route along the A40 in 2011/2 as part of their cycle superhighway scheme. Therefore the requested ring fence was denied as the cycle route would be funded by TfL. Residents were keen to see the cycleway located on the south side of the carriageway.

BD advised that Berkely First had informed him that they had already paid Ealing Council S106 to the sum of £200,000 for transport infrastructure improvements. It was suggested that some of this money could be used to improve the cycle network in the Acton area.

Residents expressed a wish that the proposals must be presented as part of TfL's wider strategy for this part of the A40. In this regard it was noted that the strategy will cut across many areas and functions of TfL.

Residents also raised whether TfL had worked with the Olympics team to explore opportunities for funding to improve the A40 as a key route for movement during the Olympics. Officers from TfL confirmed that they would look into this matter further.

Residents were very concerned that the proposals were site specific and did not include the adjacent footpaths, verges and road crossings that link the developments. Residents sought clarification as to how TfL/Ealing Council proposed to show a cohesive linked overall design plan from Site 1 (Kathleen Avenue) to Site 13 (Glendun Road) inclusive, which would include a continuous design for landscaping/tree planting, foot paths, cycle routes etc. Where is the source of funding to provide for the wider landscaping works?

Residents advised that street crime is a particular issue in the area, and so should be addressed through the development proposals.

AC requested noise modelling data. AB confirmed that much of this modelling work is now completed, and will be presented as part of the consultation programme.

How many units will be accommodated across the 12 sites? AB confirmed that current plans are in the region of 450 units.

In terms of the building form and massing, CB sought clarification as to what TfL's current thinking was with regard to the number of storeys. AB advised that this could vary from site to site, but for the residential sites they were envisaging something in the region of four storeys. TfL were of the opinion that for the central commercial sites something taller could be accommodated.

EY asked the group how best to present the proposals to the wider community. It was suggested that a door drop, along the lines of that organised for the Bridge proposals would be welcome. An exhibition(s) would also be welcome.

The Chair asked TfL what would happen to the sites if there was no flexibility in the depth of the Green Corridor, i.e. if it remained at 25m. Officers from TfL advised that if no flexibility was allowed then only the largest sites (in depth) would likely be viable/marketable for development. On most of the sites, the land outside of the 25m zone, was considered too small to be viable for quality development. The Chair asked whether this position would change if some flexibility was allowed, i.e. allowing for a reduction of 5m to 20m overall in the depth of the Green Corridor. AB responded by confirming that whilst some development could be delivered on the larger sites, many of the smaller sites would still be too small to accommodate quality development.

SM requested that a copy of the slides be circulated to the wider group, to aid chairs in discussions with their wider groups. It was agreed that the Chair (KC) would hold one copy of the presentation, which could be shared with those present at the meeting.

5. Next Steps

Those residents in attendance agreed to feed back to residents of their residents group/association.

A follow up meeting of the Steering Group is needed to discuss the programme of consultation/engagement. This will also be an opportunity for Chairs to provide initial feed back to TfL. IW to organise. Consultation is likely to commence early next year.

It was suggested that a group email for the Steering Group be set up. Officers to organise.

6. Next Meeting

To be confirmed. IW to circulate proposed dates.

7. Close

KC thanked those in attendance.

Annex 4
Pre-Application Letter from TfL to LB Ealing
Pre-Application Advice Letter from LB Ealing to TfL



Our ref: A40/pre-app

Mr Malhotra
Ealing Council
Perceval House
14-16 Uxbridge Road
Ealing
London
W5 2HL

21 April 2011

Dear Mr Malhotra

Transport for London
Group Planning

Strategy and Policy
10th Floor Windsor House
42-50 Victoria Street
London SW1H 0TL

Phone: 020 712 64157
Email: ruthcunningham@tfl.gov.uk
tfl.gov.uk

Request for informal planning advice regarding the development of 13 TfL owned sites along the A40 Corridor, Ealing

Enclosed is a request for pre-application advice regarding the development of 13 Transport for London (TfL) owned sites which sit along the A40 carriageway in the London Borough (LB) of Ealing. As stated on the pre-application request form, TfL would like a meeting with Ealing Officers at the earliest opportunity, followed by written advice.

TfL Corporate Finance Property Development (CFPD) recently commissioned Landolt Brown to provide a co-ordinated framework (hereafter the draft Masterplan) for the development of all 13 TfL owned sites which sit along the A40. The study established the potential to deliver a meaningful green corridor whilst delivering an economically viable scheme.

The proposals set out in the draft Masterplan have been developed in close discussions with Senior Officers of the Borough to help establish a basis for redevelopment which meets local needs whilst also meeting planning policy requirements, with particular focus on:

- the principle of development on the site; and
- the delivery of a meaningful and high quality green corridor.

Pre-Application Requirements

As a result of the draft Masterplan, TfL wish to seek Borough Officers views regarding the principles set out in the document, with a view to working with LB Ealing to further refine the document and consult on the proposals. The aim is for the document to eventually become a document that is endorsed by LB Ealing.

The Borough's pre-application guidance note form sets out specific information requirements, the information required is as follows:

- Covering letter;
- Pre-application Request Form;
- 2 copies of the draft Masterplan document (see below); and
- A pre-application request fee of £1,800 (Cheque No 807871).

Required Information	Masterplan
Site Location Plan	See page 6 of the Masterplan
Information about existing use, floor space and occupation and number of car parking spaces	See section 2
Drawings and photographs to describe the site and buildings as they currently exist	See section 2
Photographs of the surrounding environment	Throughout the document
2 sets of drawings to describe the proposals	See section 7 and 9

Views sought from LB Ealing Officers

In addition to the usual considerations, there are a number of areas where specific advice is requested. In particular these are:

1. Principle of Development

The UDP has no relevant site specific policies for development on the sites, although it does acknowledge the desire for a green corridor. As a result, we have highlighted a number of national and regional documents that we believe are relevant to the draft Masterplan proposals. We acknowledge that work is underway on the Local Development Framework suite of documents and we have responded to the (i) Development Strategy Final Proposals and the (ii) Development Sites Development Plan Document in November 2010 through separate correspondence.

At the national level, the Governments emerging 'Planning for Growth' paper sets out the importance of delivering sustainable development and growth. A letter issued to Chief Planning Officers on the 31 March 2011 confirmed that the Written Ministerial Statement can be regarded as a material planning consideration. The Ministerial Statement advises that the Government's top priority is delivering economic growth. The Statement reinforces the presumption in favour of sustainable development whereby development which supports growth, should wherever possible be 'yes'. The Ministerial Statement also notes that Local Planning Authorities should

"... therefore press ahead without delay in preparing up-to-date development plans, and should use that opportunity to be proactive in driving and supporting the growth that this country needs. They should make every effort to identify and meet the housing, business and other development needs of their areas, and respond positively to wider opportunities for growth, taking full account of relevant economic signals such as land prices".

Policy 2A.1 (sustainability criteria) of the 'London Plan Consolidated with Alterations' (February 2008) and Policy 1.1 (delivering the strategic vision and objectives for London) of the draft Replacement London Plan (October 2009) seeks to promote sustainable development which is achieved through promoting development on previously developed land and derelict sites.

Policy 3A.3 (maximising the potential of sites) of the London Plan Consolidated with Alterations' notes that this is achieved through encouraging mixed use development on vacant and derelict sites in close proximity to public transport

This message is reinforced in the Mayor's 'Land for Transport Function Supplementary Planning Guidance' (May 2007) which makes a specific reference to the A40 sites. The document acknowledges that these sites could have development potential and advises that LDF's should be updated to reflect this development potential. Para 8.5 states:

..."A number of sites that were acquired or safeguarded for highway improvement schemes are no longer required, for example sites along the A40. While some sites could be suitable for transport related uses as they benefit from good road access, other sites will have redevelopment potential for residential, commercial or community uses. LDF's should be updated to reflect the status of these schemes".

A mixed use development scheme on the 13 sites, incorporating a green corridor would result in utilising vacant land for development whilst delivering residential and commercial development, thus meeting the objectives of sustainable development. Subsequently, development would complement the surrounding land use, whilst encouraging economic growth and regeneration in the area. Development of these sites is also likely to act as a catalyst for further development in the area. The promotion of development on the sites is in line with national, regional and local planning policies. TfL would be interested in the views of Ealing on this matter.

2. The principle of the Green Corridor

Currently, section 10.3 of the UDP identifies all 13 TfL owned sites within the green corridor. Supplementary Planning Guidance 22: A40 Acton Green Corridor expands upon the parameters of a green corridor, in particular, the delivery of a 25m green zone. The draft Masterplan proposes to deliver a green corridor 15m in width. Whilst the delivery of a 15m landscaping corridor does not entirely align with current planning policy, it is acknowledged both by Borough Officers and TfL that the delivery of a 25m corridor is untenable on a number of grounds, this includes both on economic viability and delivery of high quality housing. An explanation regarding the delivery of a 15m corridor is comprehensively discussed in the draft Masterplan. TfL would be interested in the views of Ealing on this matter.

3. Height of the Buildings

Existing policy 4.1 (Design of Development) notes that development should be guided by a number of principles, this includes appropriate height and scale. The proposed building heights for the sites range from 1 to 7 storeys in height, this is set out in Table 2 below. The scale of existing housing adjacent to the sites within parcel 1 and 3 is of relatively modest scale. Existing housing varies from two to five storeys, though the commercial buildings around Gypsy Corner are significantly taller than this. The area summaries provided in section 10 of the draft Masterplan are based on 4 storeys of residential development in order to adopt a conservative basis for development appraisals, though the townscape benefits of larger buildings, if well designed, should not be discounted at this stage. TfL would welcome the views of Borough Officers regarding this matter.

Table 2: Height of Buildings

Parcel	Site	Floors
Parcel 1	Site 1	4
	Site 2	4
	Site 3	4
Parcel 2	Site 4: Gypsy Corner	4-7
	Site 5	1
	Site 5	1
	Site 7	1
	Site 8	1 plus mezzanine
Parcel	Site 9	4
	Site 10	4
	Site 11	4
	Site 12	4
	Site 13	0 – landscaping

Given that the principle of development and the delivery of a green corridor have yet to be agreed, detailed design of the scheme has not been developed at this stage and therefore it is considered inappropriate to comment on this aspect of the scheme at this stage.

Moving Forward with Ealing

Moving forward, TfL would like to meet with Borough Officers and gauge their views regarding this draft Masterplan document. We would wish to work alongside the Borough Officers to refine the draft Masterplan to ensure proposals put forward are 'agreed in principle' and are both viable and deliverable. TfL wishes to consult on the proposals set out in the document with the view of this potentially being a document endorsed by LB Ealing.

TfL would be eager to work with the Borough regarding developing an Engagement Strategy which will set out a proposed engagement approach; we shall send a draft of this document in early May.

I look forward to receiving confirmation of receipt in due course and a date for the pre-application meeting. If you require any further information please contact me in the first instance or Paul McGartoll on 0207 126 4328 or Jonathan Cornelius on 0207 126 3294.



Ruth Cunningham

*Senior Environmental Planner
42 – 50 Windsor House*

Victoria
London
SW1H 0TL

Ealing Council

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Transport for London
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Tel: (020) 8825 6600
Fax: (020) 8825 6610

Your ref:	Our ref:	Extension:	Date:
A40/pre-app	PAC/11/1691	7725	14 th June 2011

Dear Ms Cunningham,

Town and Country Planning Act 1990 (As Amended)

Address: The 13 TfL (Transport for London) owned sites alongside Western Avenue (A40) in Acton, London specifically:

Sites 1 – 4 and 6 – 8 : South West side between Kathleen Ave. & Rosebank Avenue.

Site 5 : North East side junction of Victoria Road and Park Royal Rd.

Sites 9 & 10 : North East side between Paddington Main Line and London Loop line bridges

Sites 11 – 13 : South West side between Gibbon Road and Homebase site

Thank you for your pre-application advice request for informal planning advice regarding the development of 13 TfL owned sites along the A40 Corridor, Ealing. The Draft Masterplan as submitted by TfL was presented to a meeting of various officers of the council on the 26th May 2011 and the following represents the Council's pre-application advice concerning this document. It is the LPA's understanding that TfL require from the council an understanding of the LPA's position on the principle of developing over these sites.

Please note that this advice represents officer opinion and is given without prejudice to the formal outcome of any future planning application.

Submitted Plans/Documents

Transport for London A40 Sites – Draft Masterplan

Site Description

This pre-application advice relates to 13 TfL owned sites, which extend from Kathleen Avenue to the north-west, to Glendun Road to the south-east. All but three of the sites are on the south side of the A40 and have been grouped in the submitted draft masterplan into three distinct parcels:

Parcel 1 – This comprises sites 1-3 to the north-west. These are all linear sites on the south side of the dual carriageway, with long frontages onto the A40 and are intended solely for redevelopment as new private and affordable housing

Parcel 2 – This comprises sites 4 to 8, with one site (5) on the north side of the A40. These sites are more varied in footprint and character and are impacted directly by the major junction at Gypsy Corner where Horn Lane / Victoria Road traverse the A40. These sites are intended for mixed-use with the emphasis on commercial activity at low-level in response to the particular challenges presented by the environmental conditions.

Parcel 3 – These comprise sites 9-13, with sites 9 and 10 being located on the northern side of the A40. With the exception of site 9, all of these sites are linear in character with long frontages along the A40 and are intended for use for private and affordable housing only. Parcel 13, the westernmost site is narrow (approximately 15 metres) and it is not intended to provide built development over this area, with public landscaping proposed.

Proposal

Residential development on sites 1 – 3 and 9 –12, advert on site 5, commercial uses on sites on 4, 6, 7 & 8 and landscaping on site 13, provision of cycle paths, revised bus stop siting and landscaping of green corridor.

UDP Designations

National Policy Statements and Guidance

PPS 1 Delivering Sustainable Development

Supplement to PPS 1 'Planning & Climate Change` (December 2007)

PPS 3 Housing

PPS 4 Planning for Sustainable Economic Growth

PPS 9 Biodiversity and Geological Conservation

PPS 10 Planning for Sustainable Waste Management

PPS12 Local Spatial Planning

PPG 13 Transport

PPG 17 Planning for Open Space, Sports and Recreation

PPS 22 Renewable Energy

PPS 23 Planning and Pollution Control (Annex 1 Pollution Control, Air and Water Quality)

PPG24 Planning and Noise

PPS 25 Development and Flood Risk

The London Plan (consolidated with amendments since 2004) 2008

The Broad Development Strategy

2A.1 Sustainability Criteria

2A.2 The Spatial Strategy for Development

2A.9 The Suburbs: Supporting Sustainable Communities

Thematic Policies – Living in London

3A.1 Increasing London's Supply of Housing

3A.2 Borough Housing Targets

3A.3 Maximising the Potential of Sites

Table 3A.2

3A.5 Housing Choice

3A.6 Quality of New Housing Provision

3A.7 Large Residential Developments

3A.8 Definition of Affordable Housing

3A.9 Affordable Housing Targets

- 3A.10 Negotiating Affordable Housing in Individual Private Residential and Mixed Use Schemes
- 3A.11 Affordable Housing Thresholds
- 3A.13 Special Needs and Specialist Housing
- 3A.17 Addressing the Needs of London's Diverse Population
- 3A.18 Protection and Enhancement of Social Infrastructure and Community Facilities
- 3A.20 Health Objectives
- 3A.23 Health Impacts
- 3A.24 Education Facilities
- 3A.26 Community Strategies
- 3A.28 Social and Economic Impact Assessments

Working in London

- 3B.1 Developing London's Economy
- 3B.2 Office Demand and Supply
- 3B.3 Mixed Use Development
- 3B.11 Improving Employment Opportunities for Londoners

Connecting London – Improving Travel in London

- 3C.1 Integrating Transport and Development
- 3C.2 Matching Development to Transport Strategy
- 3C.3 Sustainable Transport in London
- 3C.9 Increasing the Capacity, Quality and Integration of Public Transport to meet London's Needs
- 3C.16 Road Scheme Proposals
- 3C.17 Tackling Congestion and Reducing Traffic
- 3C.19 Local Transport and Public Realm Enhancements
- 3C.20 Improving Conditions for Buses
- 3C.21 Improving Conditions for Walking
- 3C.22 Improving Conditions for Cycling
- 3C.23 Parking Strategy
- 3C.25 Freight Strategy

Enjoying London

- 3D.7 Visitor Accommodation and Facilities
- 3D.8 Realising the Value of Open Space and Green Infrastructure
- 3D.11 Open Space Provision in DPDs
- 3D.12 Open Space Strategies
- 3D.13 Children and Young People's Play and Informal Recreation Strategies
- 3D.14 Biodiversity and Nature Conservation
- 3D.15 Trees and Woodland

The Crosscutting Policies: Climate Change and London's Metabolism

- 4A.1 Tackling Climate Change
- 4A.2 Mitigating Climate Change
- 4A.3 Sustainable Design and Construction
- 4A.4 Energy Assessment
- 4A.5 Provision of Heating and Cooling Networks
- 4A.6 Decentralised Energy: Heating, Cooling and Power
- 4A.7 Renewable Energy
- 4A.9 Adaptation to Climate Change
- 4A.10 Overheating
- 4A.11 Living Roofs and Walls
- 4A.13 Flood Risk Management

4A.14 Sustainable Drainage
4A.16 Water Supplies and Resources
4A.17 Water Quality
4A.18 Water and Sewerage Infrastructure
4A.19 Improving Air Quality
4A.20 Reducing Noise and Enhancing Soundscapes
4A.22 Spatial Policies for Waste Management
4A.28 Construction, Excavation and Demolition Waste
4A.33 Bringing Contaminated Land into Beneficial Use

Designs on London

4B.1 Design Principles for a Compact City
4B.2 Promoting World Class Architecture and Design
4B.3 Enhancing the Quality of the Public Realm
4B.5 Creating an Inclusive Environment
4B.6 Safety, Security and Fire Prevention and Protection
4B.7 London's Resilience and Emergency Planning
4B.8 Respect Local Context and Communities
4B.10 Large Scale Buildings – Design and Impact
4B.11 London's Built Heritage
4B.15 Archaeology

The Sub-Regions, Central Activities Zone and Government Growth Areas:

5A.1 Sub-Regional Implementation Frameworks
5F.1 The Strategic Priorities for West London

Implementing the London Plan:

6A.4 Priorities in Planning Obligations
6A.5 Planning Obligations

Supplementary Planning Guidance /Documents

Housing

Accessible London: achieving an inclusive environment
Providing for Children and Young Peoples Play and Informal Recreation
Sustainable Design & Construction
The London Housing Strategy
The London Plan: Interim Housing Supplementary Planning Guidance (April 2010)
The Mayor's Transport Strategy
The Mayor's Biodiversity Strategy
The Mayor's Energy Strategy

Ealing Unitary Development Plan: New Plan for the Environment 2004 (saved policies)

Chapter One: Strategy

1.10 Legal Agreements and Partnerships

Chapter Two: Environmental Resources and Waste

2.1 Environmental and Other Sustainability Impacts
2.2 Regeneration of Special Opportunity Sites
2.5 Water – Drainage, Flood Prevention and Environment
2.6 Air Pollution and Quality
2.7 Contaminated Land
2.9 Energy
2.10 Waste Minimisation and Management

Chapter Three

- 3.2 Green Corridors and the Waterway Network
- 3.4 Public and Community Open Space
- 3.5 Land for Sports, Children's Play and Informal Recreation
- 3.8 Biodiversity and Nature Conservation
- 3.9 Wildlife Protection

Chapter Four: Urban Design

- 4.1 Design of Development
- 4.2 Mixed Use
- 4.3 Inclusive Design – Access for All
- 4.4 Community Safety
- 4.5 Landscaping, Tree Protection and Planting
- 4.9 Ancient Monuments and Archaeological Interest Areas
- 4.10 Commercial Frontages and Advertisement Signs
- 4.11 Noise and Vibration
- 4.12 Light Pollution
- 4.14 Television Satellite Dishes, Radio Masts and other Apparatus

Chapter Five: Housing

- 5.2 Affordable Housing
- 5.3 Lifetimes Homes and Wheelchair Housing
- 5.4 Range of Dwelling Sizes and Types
- 5.5 Residential Design
- 5.6 Small Dwellings and Flats

Chapter Six : Business

- 6.1 Supply of Land and Property for Business Use
- 6.2 Proposals for Office Development
- 6.7 Hotel Development

Chapter Seven : Shopping and Town Centres

- 7.1 Promoting and Enhancing a Network of Centres and Promoting Key Sites
- 7.2 New Shopping Development and the Sequential Approach
- 7.6 Eating, Drinking and Entertainment

Chapter Eight: Community Facilities

- 8.2 Major Developments and Community Facilities
- 8.8 Health Care Facilities

Chapter Nine: Development, Access and Parking

- 9.1 Development, Access and Parking
- 9.3 Major Transport Projects
- 9.5 Walking and Streetscape
- 9.6 Cycling
- 9.7 Accessible Transport
- 9.8 Low Car Housing and City Car Clubs
- 9.9 Highways and Traffic Management

Ealing UDP Supplementary Planning Guidance/Documents

- SPG 1 Sustainable checklist
- SPG 3 Air Quality
- SPG 4 Refuse and recycling Facilities (draft)
- SPG 5 Urban Design Statements

SPG 6 Plot Ratios
SPG 7 Accessible Ealing
SPG 8 Safer Ealing
SPG 9 Trees and development guidelines
SPG 10 Noise and vibration
SPG 13 Garden space
SPG 14 Indoor living space for New Dwellings and Conversions
SPG 20 Transport Assessments Reports for Development
SPG 21 Green Travel Plans
SPG 22 A40 Acton Green Corridor Strategy
SPD 1 Affordable Housing
SPD 2 Community Facilities
SPD 3 Low Car Housing in Controlled Parking Zones
SPD 7 Car Clubs

Designations within the UDP

Western Avenue is a Strategic Road
Horn Lane, Leamington Park, Victoria Road and Wales Farm Road are Main Distributor Roads
Site 1 – Part Green Corridor/Part Residential
Site 2 – Part Green Corridor/Part Residential
Site 3 – Part Green Corridor/Part Residential
Site 4 – Part Green Corridor/Part Residential/Part Employment Site. Most of the site is in an Archaeological Interest Area
Site 5 – Green Corridor
Site 6 – Green Corridor
Site 7 – Green Corridor
Site 8 – Green Corridor
Site 9 - Part Green Corridor/Part Residential
Site 10 – Part Green Corridor/Part Residential
Site 11 – Part Green Corridor/Part Residential
Site 12 – Part Green Corridor/Part Residential
Site 13 - Green Corridor

Please be advised that the adopted Unitary Development Plan 'Plan for the Environment', which contains details of all of the Council's adopted UDP Policies and Supplementary Planning Documents and Guidance is available on the Council's website www.ealing.gov.uk

Planning Considerations

Principle of Development/Planning Policy

The policy issues mainly pertain to ensuring that the scheme provides for an acceptable Green Corridor. In this regard both existing and emerging planning policy on Green Corridors are relevant.

The current Unitary Development Plan 2004 (UDP) sets out the following policy in relation to the Green Corridor:

Policy 3.2 states that the Council will not normally permit development within Green Corridors, and development adjoining or affecting the setting of these corridors will be expected to enhance their visual, nature conservation and recreational qualities and their visual and environmental continuity.

The UDP map shows a Green Corridor of 25m wide (average) in the Acton area. This policy is largely being carried forward into the emerging LDF (Local Development Framework) and the Green Corridor boundary currently remains unchanged from that defined in the 2004 UDP.

All 13 TfL sites are also designated as Development Sites in the current Development Sites Document. For the larger sites, the development site boundaries also encompass land outside of the defined Green Corridor.

Both the adopted UDP policy and the emerging LDF documents recognise the unique circumstances that exist with regard to the Acton A40 part of the Green Corridor network, in that the Green Corridor is still to be delivered. In this regard, whilst UDP policy 3.2 establishes a presumption against built development within the Green Corridor, the supporting text acknowledges that in the case of the A40 Green Corridor (which the sites form part of), there may be limited opportunities for development. This flexibility in the text was included at the recommendation of the Planning Inspector who oversaw the Inquiry into the UDP. The Inspector recognised that as the land was outside of the ownership of the Council, the delivery of the Green Corridor in the form of an enhanced landscape strip, improved cycleway/pedestrian route, and an improved noise environment would most likely be dependent on and enabled by some development on parts of the sites defined as Green Corridor. The Inspector agreed that development may in some instances need to encroach onto land defined as Green Corridor.

The Inspectors who presided over the two planning appeals for sites 4 and sites 1 and 2 discussed in the Draft Masterplan also acknowledged the need to apply some flexibility if the Green Corridor objectives are to be delivered.

Importantly, it was also agreed by the Inspector that the delivery of the Green Corridor objectives was not contingent on the protection of the full 25 metre deep corridor. It was also acknowledged that the built form, subject to its design, could also function as a noise barrier benefiting residents to the rear.

Therefore, there is some flexibility already built into existing planning policies. However, there is a lack of clarity and agreement between all parties (TfL, Ealing Council, local residents and interest groups) in terms of interpreting this flexibility. It is hoped and anticipated that some clarity can be provided through the emerging policies of the LDF to resolve this issue.

Guidance in relation to the Green Corridors is set out in two key policies in the emerging Development Strategy document as follows:

LDF - Development Strategy Final Proposals - September 2010

Final proposal 3.1

Realising the potential of the A40 Corridor & Park Royal

- (a) By 2026, seek the development of 3,000 additional homes (25 per cent of the boroughs' net gain in housing).*
- (b) To achieve an appropriate balance within the corridor between localities for regeneration and those localities which merit conservation of the built and natural environment.*
- (c) To enhance greening opportunities along the A40 corridor, develop two cycle hubs in Greenford and Northolt and create new cycle/pedestrian routes parallel to the A40 but separated by trees and shrubs where opportunities exist.*
- (d) To further explore opportunities for creating a district energy network at Southern Gateway and Greenford town centre.*
- (e) To further explore opportunities to reduce exposure to air and noise pollution for existing residents.*

Final Proposal 5.3

Protect and Enhance Green Corridors

The council in seeking to protect and promote the network of Green Corridors in the borough will promote the following proposals for enhancement:

(c) Road Network: protection and enhancement of landscaped corridors, including additional planting where possible. Where feasible footpaths and cycle paths to be incorporated within the corridor, with landscaping providing a buffer between the road edge and paths.

Following the consultation on the Final Proposals last autumn it is acknowledged that further refinement of these policies is necessary. Policy 3.1 is designed to apply across the full length of the A40 Corridor, with greening opportunities being sought wherever possible. It is accepted however that the policy needs to recognise the unique circumstances that exist with regard to the Acton A40 part of the Green Corridor network, in that this section of the Green Corridor is still to be delivered. It is therefore proposed that additional supporting text would need to be added to this policy to recognise this distinction.

It is proposed that this distinction is also illustrated in supporting mapping. Accordingly the emerging policy also accepts a level of flexibility in relation to development adjoining or within this section of the Green Corridor network. It will also be necessary to define criteria in the policy to help judge this level of flexibility. In this regard, it is recommended that additional text is added to the policy which defines the key development principles/design parameters, which it expects development proposals to adhere to in transforming this Green Corridor. These are broadly the same principles captured in the diagrams in section 6 of the submitted draft masterplan. Moreover, the next iteration of the Development Management DPD (Development Plan Document), will include more detailed criteria to guide consideration of planning applications, which either adjoin or directly effect the Green Corridor network. Further detail will also be provided in the Development Sites DPD.

The Council's usual renewable energy and residential standards will apply to any development of this site.

Density

Your attention is drawn to Table 3A.2 of the London Plan for density considerations. Density is only an indicative measure of the scale and intensity of a development. In the assessment of a planning application the Council will place greater emphasis on the quality of the environment to be created for prospective and existing residents, the compatibility of the proposal within the existing character of the area and the transport impact of a proposal.

Landscaping/Trees

The Council supports the introduction of landscaping on all of these sites in order to realise the objective of providing a green corridor along the Acton section of the A40, thereby enhancing the visual amenity of this major route into/out of London, as envisaged by SPG22. Whilst the open and generally green character of these existing sites make a contribution, the formal landscaping of these areas and use by the public for access purposes would be of more benefit. There are however a number of concerns.

If the Council is to accept the principle of a reduced green corridor from an average width of 25 metres to 15 metres and this corridor is to incorporate a 4-metre footpath and cycle track with a 2-metre verge with tree planting and any footpath provided to the built form, then this provides a limited area to provide soft landscaping and tree planting that will make a suitable contribution to the corridor. As a consequence, given the restricted width, the quality of the soft landscaping of the remainder of the corridor needs to be very high. The planting would also need to be tolerant of the high levels of pollution.

The planting of London Planes on the verge and Limes in the remaining area would generally be suitable, but a comprehensive strategy and landscaping proposals for all of the sites needs to be developed. The planting will also need to be integrated with the proposed buildings and other uses that may be proposed on these sites in order to provide a setting for the buildings. The siting and nature of any tree planting should also be considered in relation to the foundations of the building, whether it may have an effect on outlook and lighting to windows and effect on the health of occupants of buildings.

Whilst these sites may not be contiguous, they are close enough for a strategy and structural theme to be developed that can form the basis of landscaped frontages to other sites that are to be developed within the corridor. These landscaped areas should be proposed and laid out as one entity and preferably by one organisation to ensure the required continuity of approach. There is concern that if the sites are sold off separately, each applicant will have their own landscape proposals and therefore the integrity of the design, and quite likely the quality, would be lost.

It is understood that TfL will be responsible for the verge next to the A40 and adjacent footpath/cycleway, but not for the remainder of the green corridors. It is not clear who would be responsible for the management and maintenance of the corridor. If it is to be the developers of the individual sites and/or the occupants of the buildings, then it is likely appropriate maintenance would not be carried out to the detriment of the visual amenity and character of the area. It would be preferable for TfL to be responsible for the laying out and subsequent maintenance of these areas within the corridor, if it to be responsible for the verge.

The provision of seating within the corridor is questioned. The provision of paths needs to relate to the desired lines, entrances to properties and limited in order to retain as much area for soft landscaping. Whilst reference is made to dense landscaping of the corridor, consideration will need to be made to ensure this does not restrict natural surveillance or require costly and time consuming maintenance.

A tree report would need to accompany each application where trees are to be removed or lopped and topped, or where their root zones may be affected by the development. The tree report would also be needed where trees, or their root zones, on neighbouring sites may be affected. Details of the measures to protect the retained trees and rootzones during the development will need to be set out as part of this statement. This should be carried out in accordance with BS5837-2005.

Any planning application(s) would need to be accompanied by details of the landscaping, as this will form a major aspect for consideration. From the indicative layouts of the residential elements proposed, there is concern there would appear to be inadequate private usable amenity space being provided for the prospective residents (sites 1, 2 and 3 appear to have none and useable amenity space is very limited on sites 4, 9, 10, 11 and 12). The developments should be meeting the minimum standards of the Council's SPG 13. This shortfall is considered to be wholly inappropriate for sites where the standard of amenity for the residents would be reduced due to the location next to the A40 and at sites where some of the sites suggested for residential use are in an area of severe local park deficiency and a deficiency in district parks. With any private amenity space provided, it will be necessary to ensure these areas can be reasonably enjoyed both in terms of noise and air quality.

The indicative layouts also appear to make no provision for children's play areas, as part of the development. The standards of the mayor and this Council need to be met in this regard, particularly in view of the lack of suitable facilities nearby.

If suitable private amenity space and/or play space is not to be provided and the Council decides nevertheless to approve the development, the contributions under S106 of the Town and Country

Planning Act 1990 to improve public open space and play facilities in the locality of the site would be sought.

The sites are generally restricted in depth and therefore opportunities for planting at the rear of the buildings appear to be limited. Tree planting on the boundary of the sites needs to be considered in relation to the potential impact on the amenities of occupiers of neighbouring properties (outlook, lighting, health, roots). Otherwise the impact on the amenities of the occupiers of the proposed buildings also needs to be considered with regard to tree planting at the rear. The indicated scale of planting may not be feasible.

A tree report would be required with any formal submission, outlining the condition of any trees that are to be removed and retained and should include a methodology statement. A landscaping plan detailing all soft landscaping would be expected with any application that may be prepared for this site, in accordance with the Council's adopted UDP Policy 4.5.

As stated in previous advice given on this site, setting back the building from the road frontages and the existing boundaries of the site offers the opportunity to retain the existing trees and also provide defensible space for the ground floor units.

Housing

There is no indication if affordable housing will be provided as part of the development. It would be expected that at least 50% of the units would be provided as affordable housing to comply with policy 5.2 in the UDP and policies 3A.9 and 3A.11 in the London Plan. If 50% of the units (or alternatively 50% of the habitable rooms) are not proposed to be affordable, the applicant would need to submit a financial appraisal with the application, which would need to be independently assessed, at the applicants' expense. Whilst as a public body the applicants may be expecting to maximise the development potential of the site, there is a requirement under both the Mayor's policies and this Council's policies to provide on housing sites as much affordable accommodation as possible to meet the development targets.

The mix between rented : intermediate should be 70:30 (policy 3A.9 in the London Plan and SPD1 and the Mayor's Supplementary Planning Document), although it is noted that the proposed amendments to the London Plan suggest a split of 60:40.

There should be a mix in the size of the residential units in accordance with the breakdown set out in Appendix 3 of the Council's SPD1, with in total 27% 1 bed, 37% 2 bed, 24% 3 bed and 12% 4+ bed. The applicant should be encouraged to enter discussions with an RSL (Registered Social Landlord) prior to the submission of the application to ensure the size and nature of the accommodation would meet their requirements and those of the Homes and Communities Agency.

Transport and Access Arrangements

TFL will be aware the Western Avenue is a red route, which prevents any parking and servicing from being carried out. The PTAL level of these sites varies from between 2 (Poor) to 4 (Above Average) and parking would generally need to be provided within the respective sites in accordance with the adopted standards set out in the UDP. On road parking in local neighbouring residential roads is generally high.

With regard to the residential use it would be expected that the applicants would provide car club spaces within the site (or possibly on the neighbouring streets particularly if access to the sites is to be

controlled and private) as part of the proposals that would be open to other members of the public. It would be expected that the private element should be providing up to the maximum of 1 space per unit and 0.5 space per unit for the affordable element.

Parking at the rear, whilst in a quieter context would need to be considered in the light of the arrangements for providing pedestrian access to the premises. Suitable traffic calming and other safety measures would need to be incorporated into the layout and access arrangements for the development sites. It is not clear from the Draft Masterplan whether separate vehicular and pedestrian access is to be provided or whether there are to be shared surface arrangements. Separation between pedestrians and vehicles would be preferable on grounds of safety (but would encroach into the amenity space that can be provided in conjunction with the housing).

The development(s) will need to provide the minimum disabled car parking and cycle parking in order to comply with adopted standards and the parking spaces and manoeuvring areas would need to comply with the Council's adopted standards.

Access – It is noted that access and parking would take place on the side of the development away from the A40. There is a case to suggest that if this activity were to take place at the front it would have more of a calming effect on the traffic using the A40.

If it is proposed to rely on a one-way servicing arrangement for the sites, details of management of this arrangement would need to be detailed as part of any application submitted. Preferably, however two-way roads should be provided with a width of 4.1 metres (to serve up to 25 units), otherwise the requirement is 4.8 metres wide. Suitable sightlines for all traffic and swept paths for refuse, service and emergency vehicles need to be provided at the junctions and detailed as part of any application proposed.

It is considered that access to site 4 should be off Horn Lane, rather than through residential streets, especially as commercial use of the site is proposed.

The accesses to all sites needs to be considered in the context of the desire to avoid the use of the side streets for rat running and none of the Western Avenue junctions that have been blocked up should be opened up. Consideration should be given to closing some of these junctions off to provide safer conditions for cyclists and pedestrians using the proposed routes in the Green Corridor. It is not clear whether the proposed accesses would be private, or whether it would be expected to be adopted by the Council. If the latter, the accesses would need to be constructed to adoptable standards.

A separate public footpath and cycle path should be provided within the green corridor, which should be at least 4 metres wide. It is understood that TfL will be responsible for the adoption and maintenance of the public footpath/cyclepath and the intervening grassed strip alongside the Western Avenue. It is not clear who would be responsible for the maintenance of the other footpaths within the corridor and the landscaping of these areas. This would need to be resolved and clarified as part of any formal submission.

A common approach on all sites for the provision of the footpaths and cyclepaths should be established and they should be preferably developed together and in the context of the existing network and any improvements proposed. In this respect North-South connectivity across the Perryn Road footbridge has not been shown.

The design of the footpaths/cycleways within the corridors needs to be appropriate to their purpose and follow guidance in Design Bulletin 32. They should be designed to encourage their use as an alternative to the car.

There is concern regarding the proximity of the footpath and cyclepath to the A40 with respect to safety, and the health of the users. There could be some merit in using the accesses on the other side of the building for use by pedestrians and cyclists. This could also assist in providing shorter routes for cyclists and pedestrians. There has not been sufficient consideration given to improving permeability across the sites to shorten routes for pedestrians and cyclists.

Improved access between the proposed residential sites and the local schools needs to be provided. An improved environment for pedestrians and improved safety, particularly at the crossings at the junction with Horn Lane/Victoria Road and Leamington Park/Wales Farm Road pedestrian crossings would be welcomed. It is noted this may need to be a separate exercise to the development of these sites.

It would need to be clarified how servicing for deliveries to the residential units would be achieved if the entrance to these units is from the side facing Western Avenue.

The reconsideration of the siting of some of the bus stops on the A40 and associated safety issues for traffic, cyclists and pedestrians as part of these proposals would be appropriate. Further discussions with this Council is recommended upon these matters.

Any formal submission(s) will need to be accompanied by a Transport Assessment.

Environmental Health

Environmental Health Officers have advised the following in respect of the proposed developments: -

(i) Noise – These sites are subject to high levels of traffic noise and are Category D sites as defined by PPG24 and the Council's SPG10. As such they would generally be unsuitable for residential or other noise sensitive uses, notwithstanding the previous uses on these sites. Their use for commercial purposes would generally be acceptable, although depending on the nature of the uses, it would still be necessary to demonstrate what mitigation measures would be provided as part of the development for the benefit of the occupiers of the proposed buildings.

With regard to potential use of some of these sites for residential use, it is noted the buildings are to be sited approximately 15 metres from the edge of the carriageway and no noise barriers are proposed to be erected on the intervening land. The theory suggested in the submission of effectively using with the buildings extending across the width of the site and returned on the flanks as a noise barrier, with the provision of openings for habitable rooms on the elevations facing away from Western Avenue and the resultant improvement to the amenities of the occupiers of existing adjacent housing is noted. However, the details of the layout of the accommodation, the aspect, the siting and nature of the openings proposed in the elevations facing Western Avenue, together with other mitigation measures proposed would need to be set out and modelled to ensure a reasonable standard of amenity can be provided for the prospective occupants and that the levels of noise experienced within living rooms, bedrooms and amenity space, as set out within SPG10 can be achieved. In this respect if winter gardens are to be provided the level of noise experienced within these areas would need to be set out. Each site would need to be considered individually on the basis of the design solution package proposed. The suggestions with regard to the design made in section 5.4 are noted. The practicality and methodology of the suggested glazed buffer zone design solution on the Western Avenue frontage would need to be demonstrated.

It would be expected that windows are not to be opened on the elevations facing the A40 and mechanical ventilation will be necessary. The noise of this mechanical ventilation will need to be taken into account in the required noise survey and modelling.

It would be expected there would not be any habitable room windows facing on to Western Avenue. If buildings with a solid façade are provided on these sites, as suggested, the impact of the noise reverberating off these facades and affecting the amenities of occupiers of properties on the opposite side of the road and/or other neighbouring sites needs to be modelled and taken into account as part of the noise surveys and mitigation measures to be submitted with the applications. It is noted some suggestions to avoid this problem have been made in section 5.4 of the Draft Masterplan (April 2011)

Ultimately much will depend on the detailed design solution that is developed. From the information submitted to date the Council has yet to be satisfied that a reasonable standard of amenity can be provided for the occupants of the residential accommodation.

(ii) Air Quality – The sites are affected by high levels of pollution from traffic using the Western Avenue. Therefore, Air Quality Reports would need to accompany any planning application(s) submitted. The report will need to demonstrate the levels and nature of pollution experienced and details of the measures to be used to ensure that prospective occupants of the properties would enjoy a satisfactory level of amenity both internally and in the use of any amenity space provided either within the individual dwellings, or as a communal feature. Passive ventilation would not be possible. With the expected use of mechanical ventilation, it will be necessary to demonstrate where the source of fresh air for such a system would be gained at each site. It is however noted the submission indicates at section 4.3 that mechanical ventilation for the residential accommodation is unlikely to be financially viable and technically demanding.

It is noted that it is not proposed to provide residential development on sites 5, 6, 7 and 8 due to the high levels of pollution due to the proximity to the Horn Lane/Victoria Road junction.

(iii) Contaminated Land – A number of the sites have been used for commercial purposes and are therefore likely to be contaminated. There may be a degree of contamination from pollution arising from traffic on the A40.

Reports will need to be provided with any application submitted explaining the extent of the contamination and the measures that are proposed to be undertaken to ensure the sites can be used for residential property.

Environmental Services (Waste)

The outline nature of the draft masterplan, provides insufficient detail to demonstrate whether suitable refuse and recycling facilities would be provided. For information, storage areas would need to be convenient for the occupants of the accommodation and accessible for the refuse/recycling vehicles that would need to service the site(s) in accordance with the Council's standards. The maximum carrying distance for large wheeled bins is 10 metres and 25 metres for sacks.

It is also not clear at this stage, whether suitable access for refuse and recycling vehicles would be available, as vehicle access and manoeuvring areas within the sites appear to be restricted. The servicing of these sites would need to be resolved, as it appears to be restricted and may rely on one-way vehicle movement.

On sites where a mix of uses are proposed, particularly residential and other uses, it will be necessary to provide separate storage arrangements and include measures to ensure that the facilities are not used by others. A waste management strategy would need to accompany any application submitted.

Crime Prevention

The Design Officer (Metropolitan Police) commented that for the residential elements, there would appear to be generally poor natural surveillance of the Western Avenue frontage of the site. The

intention not to provide car parking on this area would therefore be generally welcomed, as parking on the other side would be overlooked from habitable room windows. It is however proposed that the A40 frontage would be used for public cyclepaths/footpaths and for access to the residential accommodation in some instances. It is important that in the design of the development, as much surveillance of this area is available as possible. As a consequence the landscaping of the green corridor should not incorporate high mounding (nothing over 1-metre), tall growing shrub planting or other features of a similar nature that would prevent views into the site from the Western Avenue and offer hiding places. The lighting of the green corridor will also be important in ensuring a safe environment.

Whilst it may improve this area by offering an active frontage, there is concern that if pedestrian access to the residential accommodation is to be provided from the A40 side of the building (as seems to be suggested in some of the design options), there will not be sufficient surveillance of people entering and leaving their properties as generally it appears habitable room windows would not be on this side of the buildings. This could provide very unsafe conditions for residents. Much will depend on the nature of the access (entrances should not be recessed and there should be no places for muggers etc. to hide). It will need to be demonstrated how many properties are to be accessed from the A40 side and whether this may form the main access to these properties, in order to establish whether, together with other users of the footpath/cyclepaths there would be sufficient movement to create a safe environment.

Where communal gardens are provided on the ground floor and where communal footpaths are proposed close to the building, defensible space should be provided for the privacy/amenity and security of the occupiers of this accommodation.

On the side of the building away from Western Avenue, there would be a preference for gardens to be sited next to the gardens of the existing housing to maintain a safe environment for the occupiers of existing neighbouring development. It appears however that there will usually be an access road with incidental landscaping provided on this boundary, which could make the neighbouring properties more vulnerable.

Details of how the car parking facilities would be made secure, the degree of surveillance and whether there would be any restrictions on access to users of the service roads would need to be submitted in conjunction with any application(s) submitted.

Other secured by design measures would need to be incorporated into the design details and the layout of the buildings and sites. Offices are not considered to present too many security issues.

Hotel – Thefts from parked cars is a particularly prevalent problem with this type of use. Safes within rooms would need to be provided.

Petrol station – Natural surveillance would be required of the entrances/exits, with CCTV provided to prevent 'drive outs' (i.e. without paying). The layout of the site needs to be carefully considered particularly with respect to siting of any cash machines. Details would be required of arrangements of access for services, post and other deliveries to maintain a secure environment in and around the buildings.

Further guidance on crime prevention matters is available in the document 'Designing out Crime', which can be accessed from www.securedbydesign.com.

Summary of Development Management/Urban Design Issues

The treatment of the frontages of the buildings fronting on to Western Avenue, which forms one of the main arterial routes into and out of West London will be important. The buildings would be set-back

and tree planting and lower level landscaping is proposed within the green corridors, which will assist in providing a setting and in breaking down the scale of development proposed. Notwithstanding this, development on these sites will be very prominent, particularly if the proposed buildings are to be 4-storeys in height and with many of the proposals intended to extend across the full width of the site.

Whilst the need for long facades to address air pollution and noise issues is noted, it will be necessary to break up and articulate these frontages to ensure the massing and bulk is reduced and to add visual interest to the buildings. The necessity for this becomes all the more apparent if openings are not to be provided and/or restricted in size and with the likelihood there will be no openings to habitable rooms on the A40 elevation. The suggestion of providing enclosed balcony access on the A40 side of the building, whether abutting the building or set away from it, raises concern as it would be important to select an inspirational design and the treatment and finishes would need to be of a high quality. The precedents shown demonstrate some of the problems associated with this approach and treatment of the elevation. It would need to be demonstrated in the detail of the design and finishes that a good quality robust finish to the building can be achieved, within the constraints of providing a reasonable internal environment for the residents and also taking account issues of safety, privacy and security, if the proposed form of development and access arrangement is to be accepted. The use of decked access does give rise to considerable concerns.

The internal size of the units would also be important in ensuring a good standard of residential amenity is provided for the residents. The size of the units should meet the minimum set out in the Council's SPG14 'Indoor Living Space for New Dwellings and Conversions'. The standards within the Mayor's Interim Housing Supplementary Planning Guidance should also be taken into account. The units would also need to offer suitable daylight and sunlight for prospective occupants. This will be particularly important if the buildings are to be relatively deep and single aspect. The provision of any north facing single aspect housing would not usually be acceptable.

The lack of adequate amenity space and children's play space within the development gives rise to considerable concern given the significant distances and relative isolation of the sites from any parkland.

The Council would be expecting to see a range of residential unit sizes provided in accordance with policy UDP 5.4. The breakdown of the size of units expected in affordable housing is set out within the Council's SPD1. Reference should also be made to the Mayor's Supplementary Guidance on Housing.

The restricted nature of some of the sites (1, 2, 3 and 4B in particular) and space available for access and parking, would result in the parking being sited immediately adjacent to the building. This would result in a poor standard of amenity for the residents, particularly for the habitable room of the ground floor accommodation. There would be a poor outlook and an unsatisfactory level of noise and disturbance from closing doors, cars starting up and manoeuvring into and out of the parking spaces and people entering and leaving their cars. There would also be a lack of privacy and it is likely that car headlights would shine into habitable rooms. The relationship between the car parking and the layout of the accommodation and the consequent creation of a reasonable residential environment would therefore need careful consideration in any formal submission.

Due to the lack of private amenity space and relationship of the residential accommodation to the parking and access arrangements, further consideration needs to be given to the depth of building proposed.

With regard to the height of buildings, the existing housing adjacent to sites 1, 2, 3, 4, 11 and 12 is two-storey and it is noted that the sites previously contained two-storey housing. In that context the height of the buildings at 4-storeys could generally be accepted. To provide higher buildings on these

sites would be out of keeping with the scale and character of development in the locality. With regard to detail the following should be noted:

1. Site 1 – The separation from the housing on Allen Way is probably sufficient. The two houses in Kathleen Avenue that back on to the site are probably not set far enough away to meet the 21 metre separation distance between facing habitable room windows required under the Council's policy 5.5 (Table 5C). These houses however do not directly face the site, but the proposed 4 storey building would be set back further on the site than the two storey housing that was previously on site 1 and so has a greater impact on privacy and outlook from these neighbouring properties.
2. Site 2 – Whilst there is probably a reasonable relationship with the housing in Court Way, the provision of a four storey element abutting and linking in with the two-storey housing in Allen Way would be likely to have an overbearing impact and result in a loss of lighting to this

neighbouring property. Whilst its inclusion from a noise perspective is understood, this aspect would need to be removed or modified.

3. Site 3 – The relationship with the housing in Court Way and Park View which are set almost at right angles to the new housing generally appear reasonable.
4. Site 4B – The attempt to link in four storey housing with the present two storey housing is highly inappropriate. The layout of the residential units on the corner of this block could give rise to problems and the relationship of this housing with the commercial development on the remainder of this site, especially if it is to be eight storey as suggested. The suggestion of providing residential accommodation on the upper floors of the commercial building on site 4A is not considered to generally offer a reasonable standard of amenity for these prospective occupants. The location facing an extremely busy junction is generally poor and there appears to be limited, usable private amenity space.
5. Site 11 – It would appear a reasonable relationship with the neighbouring housing in Gibbon Road, Strelley Way and Foster Road could be achieved.
6. Site 12 – It would appear a reasonable relationship with the housing in Bowes Road could be achieved.

With regard to the other two residential sites (9 and 10), the existing neighbouring development is more recent and in part four storeys and therefore four-storey development on sites 9 and 10 would generally be in keeping with the character and scale of the area. The details of the relationship with the existing development in Cotton Avenue, Vernon Close and Anderson Close would need to be assessed as part of any formal submission.

With regard to sites 4, 6, 7 and 8, the Council would concur the most appropriate uses are for commercial purposes due to the environment around the junction of Western Avenue with Horn Lane/Victoria Road and Leamington Park/Wales Farm Road. The ranges of uses indicated are generally appropriate for the sites. Problems may arise with the vehicular accesses into these sites and the levels of traffic these uses would generate. On site 4, the wish has been expressed in the Transport and Access comments (above) not to have access to the commercial element through the neighbouring residential street. On the question of access into site 6, this may have to be linked to the development of site 7, but access to 6, 7 and 8 is likely to be problematic, as to whether it is off Western Avenue and/or how close it can be sited to the junction with the A40.

The height and scale of building suggested for sites 6, 7 and 8 is considered to be appropriate, although on site 7 there appears to be the scope for providing a higher building(s) towards the Southern end of the site – towards the Northern end it needs to respect the relationship with the rear of the housing in Horn Lane and its rear service road.

It is noted that the indicative plan for site 8 does not include a landscaped strip and therefore the width of the green corridor has been reduced to the 2-metre green verge and 4-metre footpath/cyclepath.

The provision of a tall building on site 4A at the junction of Horn Lane and Western Avenue would be acceptable in principle. However, as mentioned above, the relationship with the building on the remainder of the site (4B) is likely to be problematic. Providing a mixed use for this site does give rise to a number of issues and a wholly commercial use of the site may therefore represent a more appropriate use of this site.

The use of site 5 for advertising gives rise to concerns and would conflict with the intentions of providing a green corridor alongside the Western Avenue. It is also sited adjacent to residential development and would not relate well to this adjacent development. The proposed siting could also affect the safety of traffic at this traffic light controlled junction on an extremely busy road.

The reduction of the width of the green corridor from an average of 25 metres to 15 metres does improve the development potential of these sites and allows a reasonable level of frontage landscaping to be provided in conjunction with a cycleway/footpath. The Council would agree in principle with the proposed uses of the various sites, except site 5. However a number of the sites remain limited in depth to provide a reasonable layout and form of development, particularly for the proposed residential developments based on the proposed schemes indicated in the Draft Masterplan.

Further work needs to be carried out to improve the layouts before the Council could be satisfied that an acceptable form of development could be achieved for all of these sites. There is still considerable detail that needs to be looked at with regard to the green corridor, the design and appearance of the frontages of the buildings facing Western Avenue, access and servicing into development, the level of parking provision and the standard of amenity offered to the residents, whilst also taking account of the relationship with existing neighbouring development.

Disabled Housing and Lifetime Homes

10% of all new units will be required to meet wheelchair housing standards set out in Policy 5.3 of the UDP and all new units must meet with the Council's Lifetime Homes Standards.

Renewable Energy

Policy 4A.7 of the London Plan, which supercedes Policy 2.9 of the UDP requires all major developments to incorporate equipment for renewable power generation to achieve carbon dioxide emission savings of at least 20%. A renewable energy statement should be submitted with any future planning application(s) detailing how the proposed development would meet this requirement. As a minimum it should include consideration of the following renewable energy options:

- Maximising passive solar gain (through orientation)
- Natural ventilation
- Thermal insulation
- Energy efficient domestic appliance and boilers
- Solar panels, including photovoltaic cells and cladding
- Micro-wind

Building Control

Any scheme would need to demonstrate that adequate access for fire appliances could be provided to meet the requirements of the fire regulations. It is not clear how access/egress to some of these sites is to be gained. It appears some require one-way access along the access roads – if so then it will be necessary for a management plan to be submitted with any application for fire brigade access. If access by fire appliances to standard cannot be achieved, then dry risers would need to be provided, or alternatively the buildings would need to have sprinklers installed.

Sustainability

A sustainability checklist will be required to be submitted with any future application(s) in accordance with SPG 1, detailing the sustainability aspects of the proposed development. The application will be required to achieve a score of 50 or above. The checklist should be carried out at an early stage in the design process to uncover ways in which the sustainability aspects of the development can be improved.

Flooding

Refer to Environment Agency Flood Matrix (www.pipernetworking.com).

Community and Statutory Involvement

In accordance with our Statement of Community Involvement, the Council strongly encourages you to engage with the community prior to the submission of your planning application. Below is a list of relevant community groups we recommend you consult with:

- Local residents
- Local Resident's Associations
- Ward Councillors
- Service Infrastructure providers (electricity, gas, sewerage and water)
- An EIA (Environmental Impact Assessment) may be required

Section 106 Obligations

Below is a list of potential Section 106 heads of terms relevant to the subject application if any permission was to be considered:

- Amenity Space/Parks: Contribution to mitigate the lack of on-site amenity space.
- Affordable Housing
- Education Contributions
- Environmental Improvements
- Highways
- Car club provision of spaces and possibly contribution towards membership
- Community Facilities
- Health Facilities
- Crossrail contribution (for office and retail developments above 500 sq m, within 1 km of a Crossrail station). The draft CIL (Community Infrastructure Levy) has been consulted on for developments creating 100sq.m or 1 dwelling seeking a contribution of £35 per sq.m to replace s106 contributions
- Possible contributions towards highway improvements/CPZ parking restrictions
- Landscaping and provision of footpath/cyclepaths in Green Corridor

- Bus-stops (Possible resiting)

Information to be submitted with the Planning Application

Below is a list of the information likely to be required as part of any future planning application(s):

- Planning Statement
- Design and Access Statement
- Transport Assessment
- Urban Design Statement
- Green Travel Plan
- Noise (and Vibration) Assessment
- Air Quality Assessment
- Tree Survey and Methodology Statement (BS5837 – 2005)
- Landscaping Plan and Report
- Sustainability Checklist
- Overshadowing Diagrams
- Sunlight/daylight Assessment
- Refuse Management Strategy
- Floor plans of lifetime homes/ disabled housing units
- Flood Risk Assessment
- Retail Needs Assessment
- Affordable Housing breakdown (mix, tenure)
- Contamination Report
- Statement of Community Involvement
- An Archaeology Report would be required for Site 4

Please note failure to provide all of the above information with your planning application is likely to lead to delays in the application being validated.

Relevant Contacts:

The following officers can be contacted to discuss specific elements of your scheme. However any formal views of the Council should be obtained in writing via the planning case officer, to ensure the views of individual specialist officers are suitably balanced against all other relevant planning considerations.

Planning Officer:	Andrew Vaughan
Policy:	Ian Weake
Highways:	Talia Hadia
Trees & Landscape:	Andrew Parry
Noise:	Simon Boniface
Refuse:	Jenny Marley
Sustainability:	Mathiue Rogers
Crime Prevention:	Bob Masdin

For further information in respect to the above comments, please refer to the relevant policies of the Adopted UDP and Supplementary Planning Guidance available on the Council's website at www.ealing.gov.uk.

Disclaimer

The advice given by Council officers in response to pre-application enquiries does not bind the Council's decision making or constitute a formal decision by the Council as Local Planning Authority.

Any views or opinions expressed are given in good faith and to the best of our ability without prejudice to the formal consideration of any planning application following statutory public consultation.

However, the written advice provided will be considered as part of the assessment of a future related planning application, subject to the proviso that circumstances and information may change or come to light that may alter that position. In this regard the weight given to pre-application advice will decline over time.

Conclusion:

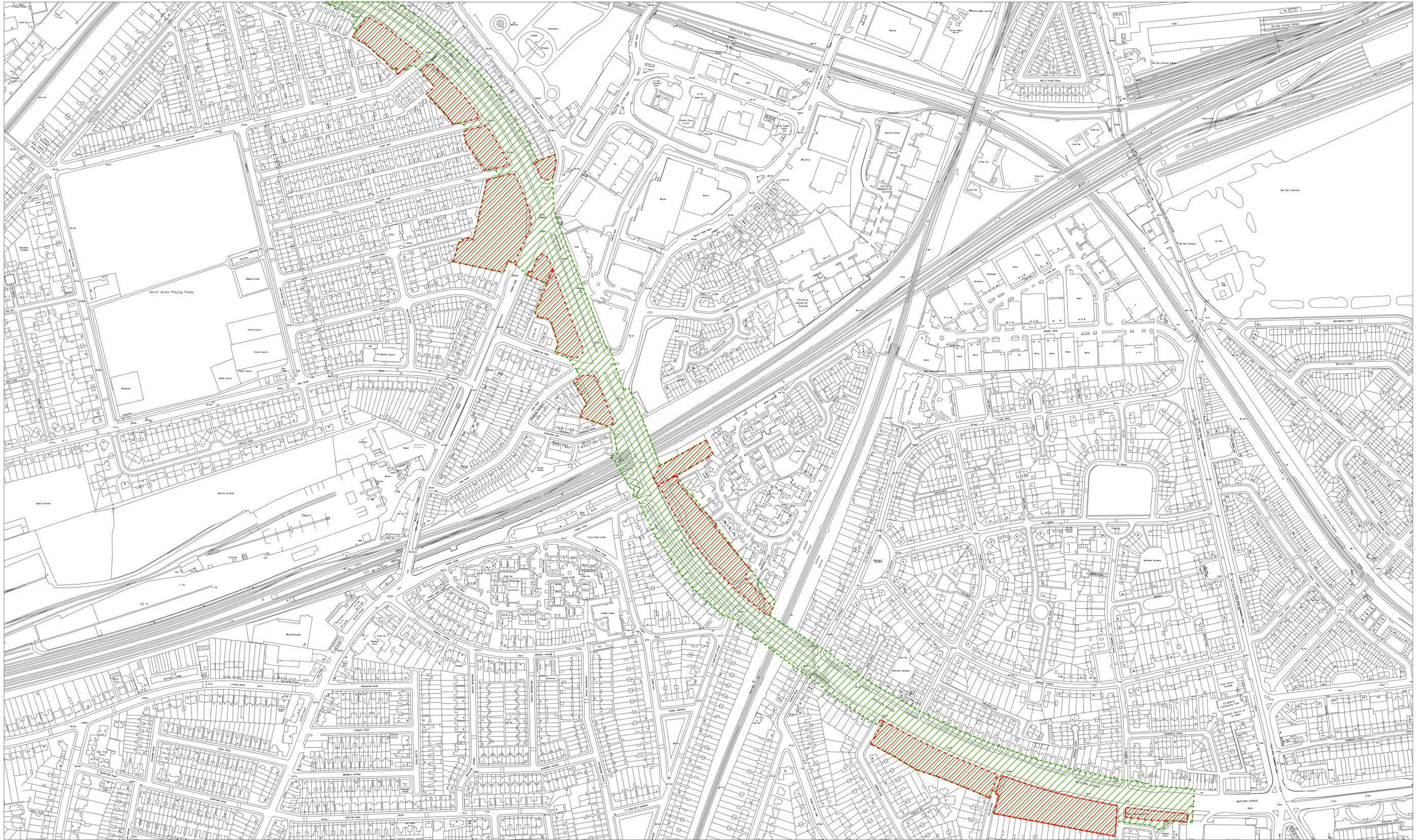
Thank you for engaging the Council at an early stage to discuss the potential development of the above sites. I trust the comments provided in this letter will assist you in developing an acceptable scheme. Should you wish to discuss this matter further, please do not hesitate to contact me on 020 8825 5560 extension 7725 or vaughanan@ealing.gov.uk.

Yours sincerely

Andrew Vaughan MRTPI
Principal Planner – East Area Team
Development Management

On behalf of the Head of Planning Services

Annex 5
Proposed Amendment to the Proposal Plan



01 MASTERPLAN
1:2500

- Notes
1. Do not scale drawings. Dimensions govern.
 2. All dimensions are in millimetres unless noted otherwise.
 3. All dimensions shall be verified on site before proceeding with the work.
 4. Landolt and Brown shall be notified in writing of any discrepancies.

Revision	Date	Reason for issue	Checked
00	XX.XX.11		



Green corridor (unimplemented, and to be implemented through enabling development)



Green corridor designation

Key

Landolt+Brown

Landolt & Brown
17.2 The Leathermarket
Leathermarket Street
London SE1 3HN
Tel: +44 (0)207 357 8547
Fax: +44 (0)207 357 8424
www.landoltandbrown.com

Project
A40 GREEN CORRIDOR

Title
OVERALL MASTERPLAN

Scale	Date	Drawn	Number	Rev
1:2500	XX.XX.11	LaB	LAB-561-00-001	00