

GREATER LONDON AUTHORITY

Good Growth

Our ref: 2021/0668/P2I/SS

Date: 29 July 2021

[REDACTED]
Iceni Projects

By email

Dear [REDACTED]

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

Site: 1 Portal Way, North Acton

LPA: London Borough of Ealing and Old Oak and Park Royal Development Corporation

Our reference: 2020/0668/P2i

Further to the pre-planning application meeting held on 13 July 2021, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely

[REDACTED]

[REDACTED]

Head of Development Management

cc [REDACTED], Deputy Head of Development Management
[REDACTED], TfL

29 July 2021

1 Portal Way, North Acton

in the London Borough of Ealing and Old Oak and Park Royal
Development Corporation

The proposal

Hybrid (Part detail / part Outline) planning application for the demolition of existing buildings and comprehensive phased redevelopment of the site for a mix of uses potentially including residential, flexible commercial and community floorspace, hotel and co-living units; car and cycle parking; landscaping; and associated works.

The applicant

The applicant is **Imperial College of Science, Technology and Medicine**, the architect is **Pilbrow & Partners** and the agent is **Iceni**

Assessment summary

GLA officers welcome the opportunity to engage further with the applicant on the emerging proposals for this site, particularly with regards to the site layout, public realm, land uses and housing type and tenure. The applicant should address comments made throughout this note, paying particular attention to the urban design with regards to layout, public realm, and building heights. As a way forward, given the scale of the proposal, GLA officers encourage a follow-up meeting be held with the GLA prior to lodgement of any future planning application.

Context

1 On 13 July 2021, a virtual pre-planning application meeting was held that included the following attendees:

GLA group:



Principal Strategic Planner, Planning
Team Leader, Planning
Urban Design
TfL Spatial Planning

Local Planning Authority:



LB Ealing
OPDC

Applicant and Development Team:



FRAME
FRAME
Pilbrow and Partners
Pilbrow and Partners
Pilbrow and Partners
Iceni Projects
Iceni Projects



Iceni Projects
West 8
West 8
Motion
Space Syntax
WSP

2 The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Site description

3 The 1.85 hectare site is located in North Acton within the London Borough of Ealing and the Old Oak and Park Royal Development Corporation (OPDC) area and also lies within the Old Oak and Park Royal Opportunity Area. The site is included within the wider allocation for the Park Royal Southern Gateway. The site is bounded by Portal Way to the west, the A4000 to the north and Wales Farm Road to the east. The site is not located within a Conservation Area and no heritage assets are located on the site nor is it designated as safeguarded industrial land (SIL or LSIS). The site is currently occupied by two interconnecting low rise warehouse-style buildings comprising of 14,000sqm of office accommodation used as the Carphone Warehouse head office.

4 The application site is located off Portal Way which forms part of the borough highway network. The A40 Western Avenue junction at Gypsy Corner is to the south of the site and is accessed via the gyratory system which includes Victoria Road, Portal Way and Wales Farm Road. The A40 forms an important part of the Transport for London Road Network (TLRN).

5 The site is approximately 250 metres from North Acton London Underground station, which provides Central Line services, and approximately 800 metres from Acton Mainline station which gives access to Great Western rail services from Paddington and will also benefit from the introduction of Crossrail services from 2019.

6 The site is served by five bus routes with the nearest stops located 120 metres away on Victoria Road, providing access to routes 487, 260, 266, 440 and a stop 360 metres away on Western Avenue providing access to route 95. As such it is estimated that the site records a very good public transport access level (PTAL) of 5, on a scale of 1-6 where 6 is the highest.

Site history

7 An extant consent exists on the site. In 2016, consent was granted (Council Reference: P/2015/0095) for the demolition of existing buildings and structures and the redevelopment of the site through construction of 8 blocks ranging in height from 6 to 32-storeys to incorporate up to 764 residential units (use class C3) and up to

4,814 sqm. of flexible commercial uses, comprising up to 1,898 sqm. of A1, A2, A3, A4 and A5 uses, up to 1,713. of D1/D2 use, the provision of public and private open space, hard and soft landscaping, basement car parking, cycle parking and plant and servicing. Of particular interest is the time period of the consent and how the affordable housing requirements for the site have been dealt with. In this instance, given the outline nature of the scheme together with the likely timeline for development given existing tenants, the consent authority agreed that the applicant's affordable housing offer could be linked to an extended consent for approval. In negotiation with the applicant the Council granted a 10 year consent for the application with a review mechanism for financial viability and affordable housing to be assessed prior to implementation. The assessment of whether the proposal provides the maximum reasonable amount of affordable housing was postponed until the applicant is ready to build the scheme.

8 On 5 May 2021 an initial pre-application meeting for the scheme was held. In response to this meeting, the GLA sent its advice note on 3 June 2021. This advice note updates the advice where relevant, but should be read in conjunction with the advice note issued on 3 June 2021.

Details of the proposal (updated)

9 The applicant is proposing a hybrid scheme comprising the comprehensive redevelopment of the site to create a mixed-use development that includes a new public park, sport and community uses, food and beverage floorspace, culture and leisure, employment floorspace including co-working and residential including co-living. Buildings will vary in height and include a 56 storey tower and two 51 storey towers. In terms of quantum of development, the proposal includes up to 1400 residential units including Build to Rent, between 17,000sqm and 20,000sqm of flexible commercial and community space, up to 350 co-living units and a hotel of up to 12,000sqm (250 rooms). The total floor area is expected to be between 157,000 to 165,000sqm GIA.

10 The hybrid application would consist of a detailed phase 1 application and an outline application. This detailed application covers the north-west corner and centre of the site and includes the 56 storey tower and a 19 storey tower and the new public park (town square). This phase is now expected to deliver up to 460 Build to Rent residential units, 550sqm of flexible / commercial and community space and up to 350 co-living units. The total floorspace of phase one is expected to be between 54,500 and 56,500sqm GIA. The remainder of the site would be subject to an outline application and will include further build to rent units within two 51 storey towers, flexible commercial and community floorspace and possibly later living accommodation and or hotel.

Strategic planning issues and relevant policies and guidance

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Ealing Core Strategy (2012), Development Management DPD (2013), Development Sites DPD (2013) and the London Plan 2021.

12 The following are also relevant material considerations:

- The National Planning Policy Framework
- National Planning Practice Guidance;
- The Oak Park and Park Royal Opportunity Area Planning Framework;
- The Mayor's Housing and Viability SPG (2017);

13 The relevant issues and corresponding policies are as follows:

- Land use principles *London Plan 2021*;
- Housing/Affordable housing *London Plan 2021; Affordable Housing and Viability SPG*
- Employment *London Plan 2021*;
- Urban design / heritage *London Plan 2021; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*;
- Inclusive design *London Plan 2021; Accessible London: achieving an inclusive environment SPG*;
- Sustainable development *London Plan 2021; Sustainable Design and Construction SPG; London Environment Strategy*;
- Transport and parking *London Plan 2021; Mayor's Transport Strategy*.

Summary of meeting discussion

14 This pre-application note focuses on those issues discussed at the follow-up meeting on 13 July, namely residential quality, the north-east and south-west access points, landscaping, ground floor uses and traffic and servicing. Advice with respect to these specific strategic issues is therefore provided under the associated sections below.

15 It is understood that the future application would be referable to the Mayor of London under the following categories of the Schedule to the 2008 Order:

- 1C(c) *"Development which comprises or includes the erection of a building that is more than 30 metres high and is outside the City of London.*
- 1B *'Development including more than 15,000m² of floorspace outside City of London.*
- 1A: *Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.*

Housing

16 With regards to housing, the previous pre-application advice note outlines the general requirements with regards to housing mix, tenure and affordable housing expectations. As such, the overarching expectations regarding residential accommodation and affordable housing are contained within that note. The following comments respond to the specific details provided at the last meeting regarding residential land uses.

17 The submitted documentation suggests that the development would include around 1400 residential units. In addition to market sale and conventional affordable units, the unit mix proposed would also include a large quantum of Build to Rent units, and possibly later living units. An element of co-living (Sui-Generis) accommodation is also proposed. The GLA welcome the varying tenure mix on the site as it will contribute both to achieving housing targets in the area and also towards attaining a mixed and balanced community. Notwithstanding this, given the scale of development, the GLA would expect the highest standard of residential accommodation and sufficient evidence to demonstrate that the proposed residential accommodation (type, size and tenure) is appropriate for the location.

Conventional residential units

18 With regards to market for sale units, the proposal includes unit sizes ranging from one bedroom to larger family sized three bedroom units. The information provided indicates that 90% of market units will be smaller one (40%) and two (50%) bedroom units.

19 The proposal also indicates that 35% of units within this element of the scheme will be affordable consisting of both social rent and intermediate products with a mix of one, two and three bedroom units. In terms of mix, there will be a higher proportion of family size (15% for intermediate and 20% for social rent) units which is welcome.

20 With regards to the proposed mix, Policy H12 recognises that central or urban sites may be most appropriate for schemes with a significant number of one- and two-bedroom units, and that the number of family-sized affordable homes should be driven by local and strategic need. The applicant should consult with the local authority to ensure that the proposed unit size mix responds to local need. It is expected that the applicant will prioritise the delivery of family housing in the affordable rented tenure.

21 With regards to tenure, the applicant is advised that the Mayor's preferred tenure split is for schemes to provide at least 30% low cost rent (social rent or London Affordable Rent) and 30% as intermediate products with the residual 40% to be determined by the Council. There is an expectation, however, that the residual 40% would be weighted towards a low cost rent product.

Build to Rent (BtR)

22 In terms of BtR units, the submitted information states there will be a mix of units sizes ranging from studios to four bedroom units which is welcome. As outlined above, the unit mix should be determined in conjunction with the local authority and be based on identified need to ensure mixed and inclusive neighbourhoods.

23 With regards to Affordable Housing, the submitted documentation indicates that 35% of the proposed units will be affordable and would meet with the Fast-track threshold requirements. These units will consist of a mix of one, two and three bedroom Discount Market Rent (DMR) units. With regards to affordable housing provision within BtR schemes, Policy H11 of the London Plan allows affordable housing to consist of DMR, however you are advised that this policy (Part C)

specifies that at least 30% of these units must be provided at an equivalent rent to London Living Rent (LLR) levels with the remaining 70% at a range of genuinely affordable rents.

Later Living Units

24 The submitted documentation notes that the later phases of the scheme could include 50 to 60 residential units specifically for later living. Such units would add to the diversity of housing on site which is welcome. Policy H13 of the London Plan provides specific details on specialist older persons housing. It is expected that the later living units would be considered as Class C3 (residential) units, and as with other forms of residential accommodation, there is an expectation for affordable units in line with the requirements of Policies H4 and H5 of the London Plan to be delivered.

Overall affordable housing proposals

25 The applicant is reminded that the threshold to follow the Fast Track Route on this site is 35% affordable housing by habitable room, with a policy compliant tenure split. As the scheme includes a mixture of conventional housing, Build to Rent accommodation, and later living units as part of the residential proposals, all the Class C3 habitable rooms proposed will be included when calculating the overall affordable housing requirement.

Residential quality

26 Policy D6 of the London Plan outlines the Mayor's expectations for housing quality and standards including minimum areas for external amenity space, storage and convenient access to servicing facilities. Table 3.1 of the London Plan provides specific details on the minimum internal space standards for new dwellings. All units should meet with these minimum standards.

27 In terms of unit layout, the plans indicate that there will be nine units per core within the tall towers. Although this is a slightly high ratio, the central location of the a large single core and short travel distance to individual units is likely to result in an acceptable level of accessibility not detracting from the quality of amenity for future residents.

28 In terms of aspect, the scheme indicates that considerable thought has been made to minimise single aspect and ensure that no such unit is facing directly north. Some concern is raised with the ability for lower level units (sub level 24) located on the north-western side of block B to achieve high quality amenity given their orientation and proximity to block B.

29 In terms of internal amenity, GLA are encouraged to see that the floor to ceiling heights will be no less than 2.4 metres for non-habitable rooms and no less than 2.65 metres for habitable rooms noting that at least 75% of units should have a floor to ceiling height of at least 2.5 metres.

30 Policy D6 of the London Plan also requires that all units have access to private amenity space. The submitted documentation relating to the housing specifications indicate that each unit will be provided with the minimum requirement, however the plans show that most units do not have balconies and as such, the lack of external amenity is contrary to London Plan policy. It is acknowledged that the building heights would likely result in some heating and micro-climate issues that may impact upon the ability to provide high quality external private amenity space, however every attempt to deliver such space (including winter gardens or similar) should be made.

Shared living (Co-living units)

31 The key objective of large scale purpose built shared living accommodation (above 50 units) is to contribute to overall housing choice for single person households who cannot or choose not to live in self-contained homes or HMOs. Specifically, this type of accommodation is sui generis non self-contained market housing, let without restriction to specific groups by occupation or need.

32 Policy H16 of the London Plan gives direction on shared living accommodation and states that such accommodation must be of good quality and design, contribute to mixed and inclusive neighbourhoods, have good accessibility, is under a single management, tenancy lengths are no less than three months, suitable communal facilities are provided and individual units are of a sufficient size. The qualitative and quantitative residential quality of co-living proposals are of paramount importance to their acceptability and to protect the amenity and quality of life of future residents.

33 The site has good access to public transport and the scheme proposes a number of dwelling types including conventional housing and affordable housing, and as such could be suitable in principle for a shared living element. In terms of accommodation, the submitted documentation states that rooms will range from 25sqm to 30sqm with 64% being 'standard' 25sqm rooms and 21% being large suites of 30sqm. In terms of amenity area, the information indicates that 11% of the floor area will be dedicated to internal amenity areas.

34 As stated above, large-scale purpose-built shared living schemes are sui generis uses providing non-self-contained housing. In order to be considered under this use class, the individual rooms must not be capable of being used as self-contained units in either size or function. There is some concern that units up to 30sq.m. in size are capable of functioning as sub-standard self-contained residential accommodation, and the applicant should reconsider the size of these units. Of crucial importance is the quantum and quality of communal amenity space, and the applicant must demonstrate that communal facilities are sufficient to allow the proposed number of residents to carry out basic living functions (cooking, dining, relaxing, laundry etc) outside of their individual units.

35 The GLA is currently in the process of drafting guidance for large-scale shared-living schemes, however, this information is not yet available. As no specific details of the communal amenity areas have been provided, it is not possible to comment on the likely quality of amenity for future residents. The acceptability of the co-living element would be dependent on detailed internal design and compliance with the

criteria in Policy H16 and supporting text. Further information on storage and shared amenity spaces (including kitchens, dining rooms, washing and drying areas, lounges) their distribution and sizes should be submitted as part of the application. These facilities must be inclusive, conveniently accessed and sufficient to meet the requirements of the proposed number of residents. Floor area breakdowns of internal and external amenities should be submitted to demonstrate sufficient provision of communal spaces.

36 London Plan Policy H16 also requires shared living developments to deliver a cash in lieu contribution towards conventional C3 affordable housing as either an:

- a) upfront cash in lieu payment to the local authority, or
- b) in perpetuity annual payment to the local authority

37 The development would therefore be expected to provide a payment in lieu equivalent of 35% of the units to be provided at discount of 50% of the market rent. All large-scale purpose-built shared living schemes will be subject to the Viability Tested Route set out in London Plan Policy H5 (Threshold approach to applications), however, developments which provide a contribution equal to 35 per cent of the units (or 50% if on public land) at a discount of 50 per cent of the market rent will not be subject to a Late Stage Viability Review.

38 The applicant would be required to pay the GLA's viability assessment costs, and an upfront payment (when the application is considered at Stage 1) of £10,000 plus VAT per application would be required to meet the cost of case officer project management, specialist viability officer review, and management team input. If a new, revised or amended application was submitted that required a further viability assessment, an additional payment would be required to meet the GLA's costs associated with the new or revised application. <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/affordable-housing-and-viability-assessment-process>.

Urban design

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

40 London Plan Policy D3 also seeks to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services.

41 At the meeting it was stated that the new town square would form part of the first phase which is strongly encouraged as it would form an important new focal point to the area. It is noted that many aspects of the proposal are still being refined, particularly with regards to the landscaping, micro-climate, highway works

Massing, layout and tall buildings

42 In terms of layout and design, the scheme has evolved since the initial pre-application. It is noted that the overall heights of the three main towers remain largely unchanged, however that the height and number of buildings along the eastern fringe of the site fronting Wales Farm Road has been reduced and the orientation of the towers altered to reduce environmental impacts and improve residential quality.

43 With regards to building heights, the acceptance of such tall buildings, in strategic terms, would be dependent upon how they relate to the built form hierarchy in the immediate vicinity /broader context, the impacts upon key views, heritage assets, SINC sites and the ability to provide high quality public realm and amenity for future residents. It is evident that considerable thought has been given to the layout and design of buildings to achieve good quality and well-connected public realm, however in terms of the built form relationship with nearby tall buildings of similar height, GLA are not yet convinced that three buildings that are greater than 50 storeys in height on the site are appropriate when considered against the current and emerging context. It should also be noted that all the buildings currently proposed in the scheme are tall buildings by definition, and the requirements of London Plan Policy D9 will therefore be rigorously applied to all the buildings in the scheme.

44 The future character of the North Acton town centre and the broader Old Oak and Park Royal context will be defined by the proposed building heights in this scheme given the significant changes to the skyline and the cluster formation of the new very tall buildings. It is acknowledged that the proposals introduce a significant new public open space, and thus there could be justification for marking out this civic heart with tall buildings (instead of clustering tall buildings around North Acton Station as envisaged in the Old Oak and Park Royal OAPF). However, the spatial hierarchy of the town centre will need to be reconsidered as a result to justify this approach, and the cumulative impact of the proposals with other new consented schemes in North Acton must be carefully scrutinised under Policy D4 (Delivering good design) of the London Plan.

45 In line with Policy D9 of the London Plan, it must also 'be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building(s)'. Capacity studies, including utility infrastructure, traffic, public services etc. must be undertaken.

46 To present the potential impacts of the proposed built form, height and massing within a future planning application, appropriate townscape analysis view studies should be undertaken utilising the body of work already undertaken. The townscape analysis should consider the three scales outlined within Policy D9 Tall Buildings within the London Plan:

- Long range views – noting the site is unlikely to be impacted by the London View Management Framework (LVMF), the application should continue to work with the OPDC / Council on agreed key local views.

- Mid range views – including key neighbourhood views demonstrating any impacts on the East Acton Conservation Area, key areas of public realm such as Acton Cemetery and the surrounding streetscape.
- Immediate views – presenting the lower storeys of the building which should introduce a human scale to the building in line with the broader context as well as responding to the existing and proposed public realm interventions.

47 Sunlight and daylight analysis should continue to explore any potential impacts on both the proposals as well as the existing surrounding context. The methodology should consider:

- The cumulative impact of surrounding / future development. E.g., 2 Portal Way to the south.
- Any stated figures (in line with BRE guidance or otherwise) should confirm the study area boundary. E.g., covering the internal park or the entirety of the public realm including the peripheral streetscape.
- Shadow studies should help to demonstrate conditions at the winter solstice (when the sun is lowest in the sky) which represents the ‘worst case’ solar access scenario.
- Solar insolation impact – this should quantify the impact on the surrounding built form in terms of the quantum of direct sunlight reaching facades, key areas of public realm, areas of private amenity space etc.
- Areas of particular concern include the public space on the northern side of the A400, Acton Cemetery as well as the residential dwellings to the northwest / west (Portal West).
- More technical daylight / sunlight analysis in line with BRE and London Plan / Housing SPG guidance should then follow in due course, as required.

48 Restructuring of the masterplan to provide precinct key markers and arrival spaces at each corner of the site is logical and supported. This should help provide a means of wayfinding for residents and visitors alike.

49 However, considering the urban morphology of the trio of towers, the spatial relationship between each and the repeated floorplate / articulation on each tower, care must be taken to ensure that when viewed from greater distances and key vistas, where only the tallest extents of the building are visible, a great emphasis is placed on the form, quality and presentation of tall towers to ensure the legibility of the individual buildings (and skyline) is not lost. This, if managed correctly, can have a positive outcome for the branding of the local centre - a statement of intent that indicates the desired future character.

50 When reviewing the potential for adequate visual connection “out” of the internal park to provide visual relief and depth of view, the building height sequence (in storeys) from west to east is as follows: 51 – 19 – 56 – 21 – 51, with a maximum stated building separation distance of just 16.5m (which appears to be lower than this stated figure in reality) and is in a northerly direction. This view, along with the others, must consider the impact of the surrounding and emerging context such as the tower to the north - Portal West - which would further impede any views of the sky. A sense of enclosure internally must be avoided, and it should be shown further how the physical size and sense of space within the proposed public square is

sufficient to avoid such an effect, considering the proposed height of the surrounding buildings.

51 Buildings F and D2 are of notable floorplate sizes especially in terms of their streetscape elevations. Their associated impact upon Portal Way and Wales Farm Road respectively (including the opposing residential uses) should be carefully considered. The quality of the street level experience should be maximised which frames the public realm and defines entrances in a safe and inclusive manner. Similarly, the tops of the buildings should make a positive contribution to the skyline and any potential for staggering heights to create variation explored.

Public Realm

52 In terms of public realm, as outlined previously the provision of a significant amount of new public space on the site is welcome, and especially the placemaking principle of providing a large central park which could function as the civic heart of North Acton. GLA officers welcome the focus on creating a new town square and enhancing permeability through the site and the creation of varied and useable areas of open space that will be surrounded by activated frontages of varying uses. GLA officers acknowledge the changes made since the initial pre-application with regards to the layout, connectivity and improvements to daylight/sunlight and good micro-climates. Notwithstanding this, it is paramount that the final design provides a space that relates well with the surrounding land use activities, is large and spacious enough for its intended level of use, is accessible to all and becomes a place for all residents and visitors to enjoy. Noting comments in paragraph 50 above, officers question whether the inclusion of a steep “mound” as part of the landscaping proposals actually reduces the useable area of the park and unnecessarily contributes to a sense of enclosure, considering the enclosing effect of the tall buildings surrounding the park. A simpler, less engineered form of landscaping may be more effective in this regard.

Design scrutiny

53 Given the scale and density of the scheme and its significance for the creation of a new town centre, it is strongly advised that the proposed development continues to undergo design review as described in Policy D4 Parts D and E of the London Plan.

Transport

Walking, cycling and active travel zone

54 In keeping with London Plan Policy T2 an Active Travel Zone Assessment (ATZ) must be submitted alongside the planning application. The ATZ must identify and assess the key walking and cycle routes between the site and key destinations, such as North Acton station. It is encouraging to see that the existing and strategic walking and cycle routes and how these integrate with the site are being considered. The proposal to introduce a public route for active modes through the site has evolved positively and is supported as it improves site and local permeability. The indicative urban realm proposals for Portal Way are impressive, except for concerns

about the provision of an on-street loading bay, which is not generally supported and not in accordance with Policy T7 of the London Plan.

55 The Transport Assessment (TA) must demonstrate compliance with the requirements of Policy T2 (Healthy Streets) of the London Plan and the Mayor's Vision Zero ambition. The proposed widening of the existing signalised crossing in Portal Way to accommodate the anticipated increase in pedestrian and cycle movement to/from the development is supported in principle but the traffic implications must be considered, assessed and mitigated, as required.

56 The quantum and location of cycle parking is yet to be set out in detail but the intention to provide policy-compliant cycle parking in line with Policy T5 of the London Plan is noted. Additionally, cycle parking should follow the LCDS guidance on design, access, quality of cycle parking, etc. The provision of short-stay cycle parking for visitors is required.

Transport impacts

57 In accordance with Policy T4 of the London Plan, a TA must be submitted alongside the application. The TA must include a public transport impacts assessment and identify appropriate mitigation. Please note that a financial contribution towards the North Acton station scheme is likely to be sought in line with all developments in this area—based on the net additional trips through the station.

58 Subject to the outcome of the bus impact assessment, a contribution toward bus capacity improvements maybe required. The bus contribution is typically calculated based on the additional demand generated by the development, expressed as a proportion of the overall capacity of a double-decker bus (75 passengers) and the total cost to provide an additional bus over a period of 5 years (£487,500).

59 Additionally, the traffic impacts of the development should be considered, and the appropriate impact assessment undertaken. Given the intention to bring forward a car-free development, it is likely that the net vehicle movements will be low and thus the traffic impacts may not be significant. Nevertheless, it is expected that the assessment demonstrates this. In addition, the assessment should include trips by taxis and servicing and delivery vehicles. The long-term aspiration to remove the gyratory and introduce two-way traffic operation in the adjoining streets was mentioned in the pre-application material. However, the applicant rightfully notes that this does not fall within the scope of the application and is a matter that will need to be pursued with Transport for London, OPDC and the London Borough of Ealing separately.

Vehicle access and car parking

60 Positioning the vehicle access point at the farthest point from the main access point for active modes (the entrance plaza) in Portal Way, is supported in principle. Further comments regarding this matter will be provided in greater detail once the proposal is finalised and access arrangements have been fixed. It is noted that proposal removes two of the vehicle access points and provides one vehicle access

point, which facilitates active routes through the site. However, this results in on-street loading bays which TfL discourages.

61 It is understood that 145 car parking spaces will be provided, which is a significant reduction on the consented level of 220. Forty blue badge parking spaces will be provided for residents with the remaining 105 spaces for the retail/commercial elements. The applicant should note that a car-free development, except for blue badge parking, would be compliant with Policy T6 of the London Plan. Please note that general car parking is not a priority and the justification for any parking other than blue badge spaces should be set out in the TA for consideration. Policy T6.1 requires the provision of 3% Blue Badge parking for the residential element from the outset and a further 7% passive provision for future use. It is appreciated that car parking is still under development. Further comments on this matter will be provided once this aspect of the proposal has been finalised. It should be noted that blue badge parking is required for non-residential elements as well.

Delivery and servicing

62 Off-street delivery and servicing comply with London Plan Policy T7. However, as discussed at the meeting, the proposal must include suitable turning facilities for large vehicles, which do not conflict with the main pedestrian and cycle desire lines. This will need to be supported by swept path analyses. The arrangements for servicing and deliveries is still evolving and further comments will be made on this issue when plans are finalised. Additionally, the applicant should consider some sort of consolidation solution for deliveries, given the number of developments coming forward in the local area.

Supporting Material

63 A Transport Assessment must be submitted alongside the application. The TA will need to cover all relevant transport issues, including but not limited to a multi-modal trip generation analysis and an assessment of the impacts of the development on highway and public transport capacity, details of the proposed access for all modes, car parking, cycle parking, delivery and servicing strategy, the provisions for mitigating the impacts of construction traffic, and the proposed interventions to address any potential adverse transport effects. In addition, the applicant is reminded that the development should reflect the TfL Healthy Streets approach. Guidance on Healthy Streets can be found here: <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets>.

64 TfL's updated guidance on Transport Assessment can be found from the following webpage: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessments>.

Management Plans

65 The application must be accompanied by a Construction Logistics Plan that is in line with TfL guidance and Policy T7 of the London Plan.

66 A travel plan should also accompany any application and should be reflective of the expected shift from car travel to active travel, as set out in the MTS and the London Plan.

67 The travel plan should be in line with TfL's Travel Planning Guidance, available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans>

Conclusion

68 GLA officers once again welcome the opportunity to engage with the applicant on the emerging proposals for this site. The principle of the proposal is supported in strategic planning terms, subject to the provision of a high quality and usable area of public realm, the provision of a threshold level of affordable housing at a compliant tenure and demonstrating that any co-living element meets the requirements of London Plan Policy H16. The applicant should address comments made throughout this note, paying particular attention to the urban design and transport section with regards to layout, public realm, building heights, minimising vehicle parking and ensuring efficient and usable servicing areas and enhancing access and wayfinding in the wider area. As a way forward, given the scale of the proposal, GLA officers strongly encourage the design to be subject to design review and once the scheme has been further refined a further follow-up pre-application meeting should be held with the GLA prior to lodgement of any future planning application.

for further information, contact GLA Planning Unit (Development Management Team):

[REDACTED], Assistant Director – Planning

email: **[REDACTED]**

[REDACTED], Head of Development Management

email: **[REDACTED]**

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