

GREATER LONDON AUTHORITY

Good Growth

Our ref: 2020/0372/P2I/SS

Date: 3 June 2021

[REDACTED]
[REDACTED]

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: 2020/0372/P2i

Further to the pre-planning application meeting held on 5 May 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

3 June 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 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 with a compliant tenure split, and demonstrating that any co-living accommodation 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 follow-up meeting should be held with the GLA prior to lodgement of any future planning application.

Context

1 On 5 May 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
████████████████████	GLA Energy Officer

Local Planning Authority:

████████████████████	LB Ealing
████████████████████	OPDC

Applicant and Development Team:

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FRAME
Pilbrow and Partners
Pilbrow and Partners
Pilbrow and Partners
Iceni Projects
Iceni Projects
Motion
Space Syntax

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.

Details of the proposal

8 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 three tall towers, two at 47 storeys and a landmark building of 55 storeys in the north-western corner of the site. In terms of quantum of development, the proposal includes up to 1400 residential units including Build to Rent, between 16,000sqm and 17,000sqm of flexible commercial and community space, up to 600 co-living units and a hotel of up to 7000sqm. The total floor area is expected to be between 155,000 to 165,000sqm GIA.

9 The hybrid application would consist of a detailed phase 1 application and an outline application. This detailed application covers the centre and north-west corner of the site and includes the 55 storey tower and the new public park (town square). This phase is expected to deliver up to 460 residential units, 600sqm of flexible / commercial and community space and up to 600 co-living units. The remainder of the site would be subject to an outline application.

Strategic planning issues and relevant policies and guidance

10 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.

11 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);

12 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

13 Following a presentation of the applicant's proposals for the site, meeting discussions covered strategic issues with respect to Principle of Development, Housing, Urban Design, Energy and sustainability and Transport. Advice with respect to all main strategic issues is therefore provided under the associated sections below.

14 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.*

Land Use Principle

15 The site is located within the Old Oak and Park Royal Opportunity Area. Policy SD1 of the London Plan seeks to optimise density and contain a mix of land uses where appropriate. The policy identifies the Old Oak and Park Royal Opportunity Area as being able to accommodate a minimum of 25,500 new homes and 65,000 new jobs across a mix of uses. In addition, the Local Plan identifies the site as suitable for high density residential with active frontage and new open civic space.

16 The proposed mixed use development that includes residential use (including co-living), commercial development, a hotel and a significant new area of public realm would contribute towards meeting the homes and jobs targets for the Old Oak and Park Royal Opportunity Area. It also has the potential to positively contribute to

place shaping as this site could act the a vibrant, civic centre to North Acton. The land use principles are thus supported.

Residential

17 London Plan Policy H1 seeks to increase housing supply by setting borough targets for new housing, with boroughs encouraged to identify additional development capacity, particularly on brownfield land. The London Plan sets a specific ten-year housing completion target for the Old Oak Park Royal Development Corporation of 13,670. The proposal to introduce residential use to this brownfield site currently in non-residential use responds positively to London Plan policies to increase housing supply and optimise sites and is supported.

18 The submitted documentation includes co-living as a proposed land use. No specific details have been provided, however Policy H16 of the London Plan outlines the requirements for Large-scale purpose build shared living (co-living). The policy states that such accommodation will only be supported subject to being of good quality and design, contributes to a mixed community, has good access, 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 proposed site has good access to public transport and the site could be suitable in principle for an element of co-living, in conjunction with the delivery of significant amounts of conventional housing and conventional affordable housing which better meets an identified housing need. The acceptability of the co-living proposals would be dependent on the detailed internal design and compliance with the criteria in policy H16, as outlined above.

Employment

19 London Plan Policy E1 supports the development of offices including improvements to the quality, flexibility, and adaptability of office space of different sizes to improve London's competitiveness and address wider objectives of the London Plan. This policy specifically seeks to increase office supply within the Old Oak area as potential reserves for CAZ-related office capacity. The proposal includes 17,000 sqm (GIA) of flexible office floor space. The provision of new office accommodation is therefore supported. London Plan Policy E2 seeks to ensure that business space is fit for purpose having regard to the type and use of the space, and that proposals for 2,500+ square metres (GEA) of business floor space need to consider the scope to provide flexible workspace to micro, small and medium-sized enterprises. London Plan Policy E3 supports the development of affordable workspace in areas where cost pressures could lead to the loss of affordable or low-cost workspace for micro, small and medium-sized enterprises.

Retail uses

20 As with the extant consent, this proposal also includes retail, food and beverage floorspace. Such uses will be used to activate the buildings at ground level and help them integrate with the new areas of public realm and food and beverage use also has the opportunity to support the night-time economy. Although, this land use has

already been accepted by way of the extant consent, Policy E9 provide specific details on how such floorspace should be delivered and should be carefully considered as part of the design process, including the quantum of retail floorspace and its potential impact on existing local centres. In addition, Policy HC6 which relates to the night-time economy should also be considered when bring the project forward.

Hotel

21 A hotel has also been included within the proposal. London Plan Policy E10 seeks to support the visitor economy as well as the needs of businesses and leisure visitors to the capital and highlights a strategic demand for new visitor bedrooms in London. In particular, the policies seek to improve the range and quality of visitor infrastructure provision in town centres and Opportunity Areas in outer London in areas well-connected by public transport as well as those designed to serve major attractions. A hotel in this location would support the objectives of this policy and is supported in principle.

Cultural uses

22 The submitted documentation indicates that cultural floorspace may be included within the scheme. Such space could contribute positively towards the activation of both building frontages and the public realm, and also assist in providing a more diverse provision of cultural facilities to the wider area. Policy HC5 of the London Plan provides support for the provision of new and enhanced locally-distinct clusters of cultural facilities, especially where they can provide an anchor for local regeneration and town centre renewal. The applicant should identify the type of cultural facilities that would be targeted and work with local operators to deliver these and reinforce local distinctiveness.

Public Realm

23 The proposal includes a new town square in the centre of the development which is strongly supported. Policy D8 of the London Plan relates to public realm and outlines criteria that such spaces should achieve to ensure they provide a high quality and usable space. In accordance with this policy, it would be expected that a space of this size and nature would provide free drinking water within the public realm. The provisions of the draft [Public London Charter](#) London Plan Guidance should also be considered in relation to this space.

Principle of development – conclusion

24 To conclude, the principle of the comprehensive redevelopment of this accessible site for residential and mixed-use development including cultural and commercial uses and public open space accords with the land use principles set out in the London Plan and is strongly supported.

Housing

25 The submitted documentation suggests that the development would include around 1400 residential units. In addition to market sale units, the unit mix proposed would also include Build to Rent units and Affordable Housing units of varying tenure which is welcomed.

Affordable Housing

26 Policies H5 and H6 of the London Plan 2021 seek to maximise affordable housing delivery in London and the Mayor's Affordable Housing and Viability SPG sets a strategic target of 50% affordable housing for all new developments.

27 The London Plan 2021 Policy H5 and the Affordable Housing and Viability SPG introduce a threshold approach to viability, whereby schemes that achieve a minimum threshold of affordable housing and provide the specified tenure split, without public subsidy, while meeting other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor can follow the 'Fast Track Route'. Fast Track schemes are not required to submit a viability assessment or be subject to a late stage viability review. Schemes which do not meet these criteria must be considered under the Viability Tested Route. The affordable housing threshold for sites such as this one is 35%. The applicant should note that all Stage 1 and 2 referrals following the Viability Tested Route may be required to pay the GLA's costs via an upfront payment of £10,000 plus VAT.

28 The SPG also provides guidance on tenure. 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. The SPG furthermore states that affordable housing products should be genuinely affordable with rents and income levels based on benchmarks set out in the Mayor's Homes for Londoners: Affordable Homes Programme 2016-2021 Funding Guidance or any subsequent guidance or monitoring reports issued by the GLA. The affordable housing offer inclusive of rents and income levels will need to be secured in the Section 106.

29 London Plan 2021 Policy H12 encourage a full range of housing choice. 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.

30 It is noted that no affordable housing offer was mentioned at the pre-application meeting and subsequent meetings will be necessary to discuss the viability position should the scheme not follow the Fast Track Route. To avoid the need for GLA viability testing and the requirement for a late-stage review, the applicant is strongly encouraged to follow the Fast-Track Route with regards to affordable housing. In any case, please note that GLA officers would require the inclusion of an early-stage (delayed implementation) review mechanism in any subsequent legal agreement associated with the development. Further, and as

outlined above, if the Fast-Track Route is not followed, then the viability information submitted will be robustly scrutinised and a late-stage review will be required.

Build to Rent

31 The proposal includes Build to Rent units which is supported, in accordance with Policy H11 of the London Plan and the Mayor's Affordable Housing and Viability SPG. A covenant should be applied to the proposed Build to Rent units preventing their sale out of BtR tenure for a minimum of 15 years and must be secured by Section 106 agreement. Clawback mechanisms would also need to be secured by Section 106, which would be triggered in the event that the covenant is broken during the 15 year period. The purpose of this would be to ensure that any affordable housing contributions which may have been negated as a result of the provision of Build to Rent units as opposed to market sale units (assuming this is the case) is recouped to provide additional affordable housing, which could have otherwise been secured. Other provisions, including unified ownership and management, length of tenancy and certainty over rent levels, should also be secured. Any affordable housing within the Build to Rent blocks (for example, Discount Market Rent or London Living Rent units), must be secured in perpetuity and should be genuinely affordable, which will require further discussion.

Children's play space

32 London Plan Policy S4 require development proposals to make provisions for play and informal recreation based on the expected child population generated by the scheme. Further detail is provided in the Mayor's 'Shaping Neighbourhoods: Play and Information Recreation' Supplementary Planning Guidance (SPG), which sets a benchmark of 10 sqm of usable child place space to be provided per child and makes clear that playspace must not be segregated by tenure. At minimum, playspace for children under five should be provided on-site. Offsite provision for over-fives, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated that it addresses the needs of residents and that there are suitable play spaces within a safe walking distance of the site. The applicant should calculate the playspace requirement and demonstrate how it will be met as part of any forthcoming application. The on-site play provision must be retained in perpetuity, not be segregated by tenure and be secured by condition.

Urban design

33 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.

34 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.

Massing, layout and tall buildings

35 In terms of layout and design, given the hybrid nature of the scheme, the height and location of the buildings and proposed new public realm the GLA would expect an exemplary design to ensure that the scheme sits well within its surrounds, provides the best quality of accommodation for future residents, and includes well designed and functional public open spaces for visitors to the site.

36 The overall approach to massing and layout responds positively to the identified constraints and opportunities on the site with regards to the optimisation of density, the significant public realm provision and providing buildings and development that could contribute to the creation of a stronger character and identity in this part of the opportunity area.

37 With respect to tall buildings, London Plan Policy D9 is clear that tall buildings should only be developed in locations identified as suitable in development plans. Policy D9 also requires tall buildings to be assessed against visual, functional, environmental and cumulative impacts. The GLA notes that Ealing's development plan states that tall buildings may be suitable in the gateway to Park Royal and as such this broadly addresses the locational requirement of Policy D9, Part B. However, the detailed design and impact criteria outlined in Part C of the policy must also be addressed before confirming compliance with Policy D9.

Public Realm

38 In terms of public realm, the provision of a significant amount of new public space on the site is welcomed, and especially the placemaking principle of providing a large central park which could function as the civic heart of North Acton. GLA officers are also encouraged by 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, particularly along the fringes of the site. The new areas of public realm must be of the highest quality to ensure that the spaces are attractive and well used by the local community. Such spaces must have suitable daylight/sunlight, good micro-climates and not impede upon the amenity of residential units. To achieve this, the proportions of building heights, street widths and the location of play spaces must be carefully considered during the development of massing options. Further, the applicant is encouraged to investigate ways to consider wider links to existing open spaces, especially enhancing access from the site towards the nearby Wormwood Scrubs which is a large area of open space within close proximity to the site, however has poor pedestrian/cycle access.

Architecture and Materiality

39 Although the architecture remains indicative, officers are encouraged by the concepts outlined within the presentation. Using materials to clearly define the varying land uses on the site, residential, civic, and retail is supported. Attention should be given to ensuring high quality detailing and the use of facing materials that respond positively to the surrounding character. Further, information on tenure distribution should be provided with the aim for a tenure blind scheme that ensures a consistent use of high-quality facing materials is carried through to the affordable tenure buildings.

Design scrutiny

40 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.

Micro-Climate

41 Wind and other micro-climatic studies should be undertaken as early in the design process as possible to ensure any mitigation requirements are designed to be integral to the form and fabric of the building. Particular attention should be made with regards to the southern area of the site where there appears to be limited separation distances in relation to the height of buildings.

Fire safety

42 In line with Policy D12 of the London Plan, a fire statement should be submitted with the application which has been prepared by a suitably qualified third-party assessor. This should clearly address the requirements of the policy, including details of construction methods and materials, means of escape, fire safety features that reduce the risk to life and means of access for fire service personnel.

Inclusive design

43 London Plan Policy D5 seeks to ensure that proposals achieve the highest standards of accessible and inclusive design. Any application should ensure that the development can be entered and used safely, easily and with dignity by all; is convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; and is designed to incorporate safe and dignified emergency evacuation for all building users. Particular attention should be given to address the significant level changes from Wales farm Road.

44 Policy D5 of the London Plan require that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. All wheelchair accessible units should be located across all tenures and any future application should include plans that show where the wheelchair accessible homes would be located. These should be distributed across tenure types and sizes to give disabled and older people similar choices to non disabled people. This information, typical flat layouts and plans of the wheelchair accessible homes should be included in the design and access statement. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.

Transport

Walking, cycling and active travel zone

45 .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. The work done so far, in terms of considering the existing public realm desire lines and looking at how the site could be integrated into the local walking and cycling route network by introducing a public route for active modes through the site, is encouraging. Additionally, the intention to improve the public realm surrounding the site is welcomed. The Transport Assessment (TA) must demonstrate how the scheme meets the requirements of Policy T2 – Healthy Streets 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 an assessment to determine the traffic impacts of this will need to be undertaken.

46 The quantum and location of cycle parking is yet to be set out in detail but the intention to provide policy-compliant (London Plan Policy T5) cycle parking 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

47 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.

48 The TA will also 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>.

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>

49 Subject to the outcome of the bus impact assessment, a financial contribution toward bus capacity improvements may also be 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).

50 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

51 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.

52 In accordance with Policy T6.1 of the London Plan, with the exception of blue badge spaces, the proposal will be car-free which is welcome. The applicant should note that blue badge parking is required for non-residential elements as well. Additionally, Policy T6.1 of the London Plan 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 the car parking proposals are still under development.

Delivery and servicing

53 It is acknowledged that arrangements for servicing and deliveries are still being developed, however as outlined in the meeting, it is understood that the intention is to provide off-street servicing, with large vehicles gaining access from Portal Way. This arrangement would likely accord with London Plan Policy T7 and is supported. At the meeting it was discussed that there would be a requirement for suitable turning facilities for large vehicles which do not conflict with the main pedestrian and cycle desire lines and that this will need to be supported by swept path analyses. Additionally, the applicant should consider a consolidation solution for deliveries, given the number of developments coming forward in the local area.

54 Full information on delivery and servicing should be provided in a Delivery and Servicing Plan (DSP). Guidance can be found at: <http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf>.

Management Plans

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

56 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.

57 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>

Sustainable development

Energy

58 As outlined at the meeting, the energy team have reviewed the energy information submitted as part of the pre-application package. Their specific comments outlining issues raised at the meeting have been forward to the applicant separately. Notwithstanding this, below is general energy related guidance that should be considered when preparing a planning submission relating to the proposed development.

59 The updated version of the GLA Energy Assessment Guidance (2020) sets out the information that should be provided within the energy assessment to be submitted at Stage 1. The latest guidance which is in pre-consultation form, aligns with the London Plan Policies SI2, SI3 and SI4 and can be found on the GLA's website (https://www.london.gov.uk/sites/default/files/gla_energy_assessment_guidance_april_2020.pdf).

60 Formal consultation on the guidance will be carried out, however applicants are encouraged to consider how these may be incorporated into their proposals. As such, applicants will be expected to investigate the potential for energy flexibility in new developments, include proposals to reduce the amount of capacity required for each site and to reduce peak demand. Furthermore, applicants will be expected to calculate and reduce whole life-cycle carbon emissions, submit a whole life-cycle carbon assessment to the GLA following the Whole Life-Cycle Carbon Assessment Guidance using the GLA's reporting template (<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance/whole-life-cycle-carbon-assessments-guidance-pre-consultation-draft>), and monitor the energy performance of a development and report on it through an online monitoring portal.

Net zero carbon target

61 The London Plan requires all major developments (residential and non-residential) to meet the net-zero carbon target. This should be met with a minimum on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations, with any carbon shortfall to net zero being paid into the relevant borough's carbon offset fund.

62 Applicants should submit a completed Carbon Emissions Reporting spreadsheet alongside their application to confirm the anticipated carbon performance of the development and should clearly set out the carbon emission factors they are proposing to use in their energy assessment.

Be lean demand reduction

63 Applicants are expected to meet the London Plan energy efficiency targets:

- **Non-residential** – at least 15% improvement on 2013 Building Regulations from energy efficiency

Cooling and overheating

64 The scheme should include measures to minimise the need for both mechanical heating and cooling. Evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with the cooling hierarchy.

Be clean heating infrastructure

65 The applicant should investigate opportunities for connection to any nearby existing or planned district heating networks (DHNs). Where such opportunities exist, this should be the priority for supplying heat to the site in line with the London Plan heating hierarchy. The applicant should refer to the guidance for further information.

66 The site should be provided with a single point of connection and communal heating network where all buildings/uses on site will be connected and drawings which demonstrate this should be provided.

67 The applicant should provide evidence confirming that the development is future proofed for connection to wider district networks now or in the future where an immediate connection is not available. Where a district heat network connection is not available (either now or in the future) applicants should follow the London Plan heating hierarchy to identify a suitable communal heating system for the site.

68 The London Plan limits the role of CHP to low-emission CHP and only in instances where it can support the delivery of an area-wide heat network at large, strategic sites. Applicants proposing to use low-emission CHP will be asked to provide information to justify its use and strategic role while ensuring that the carbon and air quality impact is minimised.

Be green renewable energy

69 The GLA expects all major development proposals to maximise on-site renewable energy generation. This is regardless of whether the 35% on-site target has already been met through earlier stages of the energy hierarchy. Solar PV should be maximised. A plan showing the proposed location and output (kWp) of the installation should be provided showing that the proposed installation has been maximised for the available roof area and clearly outlining any constraints to further PV.

Carbon offsetting

70 Applicants should maximise carbon emission reductions on-site. Where it is clearly demonstrated that no further carbon savings can be achieved, but the site falls

short of the carbon reduction targets, applicants are required to make a cash-in-lieu contribution to the relevant boroughs' carbon offset fund using the GLA's recommended carbon offset price or, where a local price has been set, the borough's carbon offset price. Energy strategies should provide a calculation of the shortfall in carbon emissions and the offset payment that will be made to the borough.

Sustainable drainage

71 The drainage strategy should aim to reduce surface water discharge from the site to greenfield rates in accordance with London Plan Policy SI.13. Where greenfield runoff rates are not feasible and robust justification is provided, a discharge rate of three times greenfield rate may be acceptable.

72 The drainage strategy should maximise opportunities to use Sustainable Drainage System (SuDS) measures at the top of the drainage hierarchy set out in London Plan policy SI.13. Roofs and new public realm areas present an opportunity to integrate SuDS such as green and blue roofs, tree pits, and permeable paving into the landscape, providing amenity and water quality benefits.

73 From April 2019, London's 33 Lead Local Flood Authorities (LLFAs) introduced the London Sustainable Drainage Proforma. This proforma is required to accompany Sustainable Drainage strategies submitted with planning applications and will form part of planning application validation requirements. The proforma sets a clear standard for the information that should be provided in a Sustainable Drainage strategy for all development in London. The proforma is intended to ensure that key information is provided with the initial planning application, reducing the need to request additional information throughout the assessment process and preventing delays in approval. Please ensure that the relevant borough's proforma is completed and accompanies the full application for this development when submitted. The proformas for all Local Authorities can be found here (<https://www.london.gov.uk/what-we-do/environment/climate-change/surface-water/london-sustainable-drainage-proforma>) and on the relevant borough's websites. This initiative is supported by the Greater London Authority (GLA) and the London Drainage Engineers' Group (LoDEG).

Water efficiency

74 The development should achieve the equivalent of an 'Excellent' rating on the water elements of BREEAM, in line with the London Plan policy SI.5. Water reuse should be considered for inclusion in the development to meet both water efficiency and sustainable drainage requirements.

Green infrastructure

75 The design process should embed urban greening as a fundamental element of building design. In accordance with Policy G5 of the London Plan, the applicant should calculate and provide the Urban Greening Factor (UGF) score for the proposed development and meet the minimum specified target. A drawing showing the surface cover types and accompanying UGF calculation should be included within any future submission. Further, it is recommended the applicant undertake a UGF calculation at the earliest opportunity to understand whether the UGF target is

being achieved, and so that they can make necessary design changes to maximise urban greening before the design is fixed for submission.

Circular economy

76 The London Plan circular economy policies including a requirement to submit Circular Economy Statements for developments. The GLA has released draft guidance for developers on how to prepare Circular Economy Statements and a 'Design for a circular economy' Primer that helps to explain the principles and benefits of circular economy projects: <https://www.london.gov.uk/what-we-do/regeneration/advice-and-guidance/about-good-growth-design/design-circular-economy>.

Conclusion

77 GLA officers 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 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):

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