

GREATER LONDON AUTHORITY

Good Growth

Our ref: 2021/0880/P3I/SS

Date: 14 October 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: 2020/0880/P3i

Further to the pre-planning application meeting held on 24 September 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

14 October 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 once again engage with the applicant on the emerging proposals for this site, particularly with regards to the site layout, materiality, public realm, land uses, co-living and affordable housing. The applicant should address comments made throughout this note, paying particular attention to the comments on affordable housing, public realm, and impact upon the urban environment for visitors and residents of the scheme.

Context

1 On 24 September 2021, a virtual pre-planning application meeting was held that included the following attendees:

GLA group:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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

Local Planning Authority:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

LB Ealing
LB Ealing
LB Ealing
OPDC
OPDC

Applicant and Development Team:

[REDACTED]
[REDACTED]
[REDACTED]

FRAME
FRAME
Pilbrow and Partners



Pilbrow and Partners
Pilbrow and Partners
Iceni Projects
Iceni Projects
West 8
Motion
Quod
Peter Stewart Consultancy
WSP
Imperial College London

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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 1325 residential units, between 21,000sqm and 22,000sqm of flexible commercial and community space, 384 co-living units and a hotel of up to 12,000sqm (260 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). 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 Old Oak 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*;
- Public realm *London Plan; Public London Charter LPG*
- 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 24 September 2021, namely residential quality, affordable housing, public realm and access, building layout and traffic and servicing. Advice with respect to these specific strategic issues is therefore provided under the associated subsections 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 two pre-application advice notes both outlined general requirements with regards to housing mix, tenure, residential quality and affordable housing expectations. As such, the overarching expectations regarding residential accommodation and affordable housing are contained within

the previous notes. The following comments respond to the specific details provided at the last meeting regarding residential land uses.

Shared living (Co-living units)

17 As stated previously, the GLA is currently in the process of drafting guidance for large-scale shared-living schemes, however, this information is still not yet available. Notwithstanding this, at the meeting more details were provided regarding the layout and design of the co-living units.

18 Specifically, it was illustrated that 24 units would be provided on each level along with a communal kitchen area. Communal areas will also be located at the lower level, middle floors and within the top levels of the scheme, equating to a total of 8sq.m. per person of communal amenity space. GLA officers are generally supportive of the layout and are encouraged to see the inclusion of kitchen facilities on all residential floors as this will provide convenient access to communal kitchen facilities and encourage interaction between smaller groups of residents, which is likely to enhance a sense of community. Whilst the proposed amount of communal amenity space is supported in principle, further calculations should be provided to show which areas have been included within this calculation (areas that are shared with the public should be excluded from the calculation).

19 The size, quality and functionality of communal amenity space is intrinsic to the proposal being considered as a sui generis co-living use as opposed to a residential use providing sub-standard residential accommodation. To illustrate this, the composition of the communal amenity spaces should be specifically set out in detail and include equipment and spatial provisions such as ovens / sinks / worktop space / fridges / table-based seating areas / comfort seating areas etc.

20 In terms of accommodation, the submitted documentation states that rooms will range from 23sqm to 28 sqm with accessible units having a floor area of 30sqm. GLA officers are of the view that the layout and overall size of the units would provide suitable levels of accommodation for future residents subject to these units achieving reasonable daylight and sunlight and being designed to include adequate sound proofing between units.

21 Overall, the proposed layout of the co-living accommodation has carefully considered the criteria in Policy H16 of the London Plan and supporting text and could be supported as part of this mixed use scheme.

Affordable housing

22 The applicant has outlined an approach through which the scheme could follow the Fast Track Route set out in policy H5 and H11 of the London Plan. This would be achieved by meeting the relevant Fast Track criteria, including the provision of 35% affordable housing, increasing this through the use of grant where available, and meeting the tenure and affordability criteria set out in the plan and relevant guidance.

23 Under this approach, the applicant would also provide a financial contribution towards off-site affordable housing provision in relation to the Co-living component of

the development, in line with policy H16 of the London plan. While the plan does not enable co-living to follow the Fast Track Route, the GLA consider that this residential-led mixed use development would be capable of following the Fast Track Route in the circumstances of this case, if the criteria set out in policies H5, H11 and H16 are met.

24 The applicant has also provided comments in relation to the approach to the early stage viability review, in particular that the indexed based approach for Fast Track Route schemes set out in the Mayor's guidance may not be appropriate for this complex mixed-use development which incorporates several tall buildings. The purpose of this is to enable schemes to follow the Fast Track Route without the need for viability information to be submitted, however, taking into account the circumstances of this case, an approach was discussed which would enable the Gross Development Value and build costs of the scheme to be determined at the application stage. This would provide a baseline position to be used for comparison at the review stage, rather than relying on indices. The value and cost figures would be assessed by the council and the GLA to ensure that these are reasonable and in line with comparable developments, however this would not require a full viability assessment and therefore would take less time to undertake and at a lower cost.

Further comments on urban design

Building A (Detailed Application)

25 With regards to the residential building (Building A), GLA officers query whether there is sufficient space within the public realm adjacent to the ground level café tenancy to provide for external seating and pedestrian circulation to Portal Way and the A4000. Further, the extensive non-active street fronting facades including 'back of house', substation and waste storage areas are disappointing and should also be reviewed.

26 In terms of internal layout of this building, at level 01 it is unclear what uses the amenity space is expected to provide given the constraining layout of the triangular floorplate with centralised core. This space should continue to evolve to ensure they provide a variety of spaces for all residents and as such flexibility is of paramount importance.

27 It is noted that there are more than eight dwellings per floor within this building. In reference to the draft Housing Design SPG (Module C) Clause 3.1 'development proposals should ensure that the number of dwellings accessed from a single core does exceed eight per floor. Deviation (by exception) from this requirement will need to be justified and mitigated by maximising corridor widths (beyond 1500mm) and introducing natural ventilation/daylight to corridors.' As such, corridor widths and natural daylight / ventilation strategies should be addressed. Further, there is a single unit per floor that does not have access to any private external amenity space. This is also north facing (and arguably single aspect) and should be reconsidered. It is noted that floorplans relating to the other amenity levels have not been provided and it is unclear how the roof will be utilised.

Daylight, sunlight and wind microclimate

28 With regards to sunlight/daylight to the public realm, as outlined in the meeting, GLA officers reiterate that part of the urban design rationale for the inclusion of several very tall buildings within the scheme would be the delivery of a significant piece of new public realm for North Acton, and therefore the importance in delivering a high quality public space that provides a comfortable environment for future users is especially important. It should also be demonstrated that the impact of the tall buildings is acceptable in terms of daylight, sunlight and microclimate. In this regard, it is acknowledged that whilst it is important to consider the site in its entirety, the current microclimate analysis methodology includes areas of footpath and areas intended for vehicular use such as the basement entrance and lay-bys. The '50% 2-hour' analysis should also be undertaken on the defined public amenity spaces (Arrival Square, Eastern Portal, Southern Terrace, Southern Portal and Central Garden) to demonstrate their individual performance with regards to achieving adequate sunlight.

29 In terms of daylight levels to residential units, the submitted documentation stated that the 'majority' of dwellings will achieve the 2% average daylight levels (ADF). Further clarity should be provided with regards to the quantum of units that will accord with the desired daylight levels. Please also note that it appears that the current calculations are based upon three metre wide, four metre deep rooms with one metre wide glazing that is full height. It is suggested that further calculations be undertaken that consider the actual proposed internal space of the apartments given the 7-12 metre core to façade dimensions and the varying arrangement / design of the fenestration.

30 No overshadowing analysis has been presented in relation to any adjacent built form (existing or proposed) – including Portal West to the north-west of the scheme. This should include Vertical Sky Component (VSC) and No-Sky Line (NSL) measures in line with BRE guidelines.

31 Regarding wind comfort, it remains unclear if the LDDC comfort categories have been addressed or will be addressed in future, and by what means the wind impacts could be mitigated. In this regard, there appears to be numerous "uncomfortable" areas at the entrances to the site (likely caused by tunnelling effects or downdrafts). It also appears that the only areas deemed suitable for sitting appear along the north-western boundary of the central garden. Comfort levels within the balance of the garden should be reconsidered and it is suggested that additional wind mitigation measures are introduced to improve comfort levels within the wider central garden area.

32 Finally, in relation to the public square, the applicant should ensure that the principles contained in London Plan Policies D8 and S6 and the Public London Charter LPG are followed, with special regard to the design of the space, and to the unrestricted access by the public to the space, the provision of free drinking water, and public toilets

Phasing

33 Clarification should be provided around phasing – especially regarding the construction of the basement given it is intrinsically linked to the remaining (Phase 2) outline elements of the application and noting that the basement's entrance is currently outside of the Stage 1 phasing line.

34 The extent of the public square to be delivered within Phase 1 should also be confirmed and whether temporary finishes will be required (and to what extent). Similarly, this will be dependent on prior basement construction across the site. Consideration of land required for construction sequencing / set down areas etc., should be made.

35 Noting the expected significant project delivery timeframe, it is advised that careful consideration of the perimeter treatment of the site during construction be made. Further, it may be worth also considering the potential for meanwhile temporary uses that could provide some short-term public benefit and site activation.

Architecture

36 With regards to the Co-living building (Building F), the long linear floorplate of the building, as seen from the north-west or south-east, results in a simple rectangular built form with little articulation particularly when seen from Portal Way. The introduction of setbacks / recesses, particularly to the top of the building, may help create greater architectural interest.

37 Further, the middle of the building utilises a highly repetitive floorplate with the same (mirrored) room module repeated across the façade and then stacked vertically. It is noted that submission of the application is imminent, however GLA officers suggest that additional variety to the floorplate be introduced to reduce the overall perceived bulk of the building.

38 Limited detailed information on the external appearance (with design narrative) has been provided, however it is essential that the chosen material pallet is one that compliments the surrounds and ensures that the scheme sits harmoniously within its context when viewed from near and far.

Transport

Walking, cycling and active travel zone

39 In accordance 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.

40 Since the last pre-application meeting in July 2021, the applicant has done further work on the walking and cycling routes through the site and internal and external public realm strategy which is welcome. It is apparent that the applicant is aiming to deliver a high-quality pedestrian and cycling environment internally and integrate this

with the existing wider network. The creation of public routes for active modes through the site will enhance permeability and pedestrian and cycle movement in the wider area. The indicative urban realm proposals for Portal Way are impressive but some concerns remain with the provision of on-street loading bays on the periphery of the site as it does not strictly comply with London Plan Policy T7, which favours off-street servicing and delivery provision. It is noted that this concern was echoed by the Ealing officers at the meeting. However, the applicant agrees to do further work to demonstrate that the loading bays will be acceptable in terms of highway safety and will have the capacity to accommodate the expected delivery/servicing trips, ensuring that this does not give rise to queuing on Victoria Road, and as such detrimental to the safe operation of the highway.

41 The Transport Assessment (TA) must demonstrate compliance with the requirements of Policy T2 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, however the traffic implications must be taken into consideration, assessed, and mitigated, as required.

42 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.

Impacts

43 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, as well as a traffic impact assessment, and identify appropriate mitigation.

44 Pre-pandemic, North Acton station was operating at capacity during the AM and PM peaks, constrained by a lack of gate line and ticket hall capacity, as well as lacking Step-Free Access (SFA). The station cannot cater for the planned growth in demand and requires substantial improvements. Transport for London (TfL) along with Ealing Council and the OPDC have undertaken a feasibility study, which indicated a cost in excess of £20m for the required improvements. As such, financial contributions have been agreed for all recent developments in this locality using a standard methodology.

45 Subject to the outcome of the bus impact assessment, a contribution toward bus capacity improvements may be sought. 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 (£387,500).

46 The traffic impacts of the development should be considered, and the appropriate impact assessment undertaken. Given the intention to bring forward a development with lower car parking compared to the consented scheme, it is likely that the net

vehicle movements will be low and thus the traffic impacts may be insignificant. Nevertheless, the assessment should confirm this. Further, the assessment should include trips by taxis and servicing and delivery vehicles.

47 The long-term aspiration to remove the gyratory and introduce two-way traffic operation in the adjoining streets was discussed again. However, the applicant will focus on improvements on the periphery of the site as part of their application and have indicated their willingness to work with Ealing Council, OPDC and TfL, to pursue improvements to gyratory. It is expected that the process for liaising with the above stakeholders will be agreed during engagement at the application stage, and appropriate planning obligations towards the modifications to the gyratory will be secured through the s106 agreement.

Vehicle Access and Car Parking

48 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. TfL will comment on this in greater detail once the proposal is finalised and access arrangements are fixed. It is noted that proposal removes two of the vehicle access points and provides a single vehicular access point, which is welcomed. However, this necessitates on-street loading bays which are not supported by London Plan Policy T7. This is discussed above.

49 Since the last pre-application meeting, the applicant has produced a parking strategy, which clarifies that a total of 148 spaces will be provided, including 39 blue badge parking spaces for the residential element and four accessible spaces for the proposed hotel, commercial and retail uses. The policy requirement of 3% active blue badge parking from the outset is met.

50 London Plan Policy T6.2 requires an additional 7% passive blue badge provision for future use, as and when required. As expressed at the meeting, some concern remains with the proposed 30 spaces for the food retail element as this may be considered an overprovision. The London Plan presumes in favour of nil car parking, with the exception of accessible parking for such uses in well-connected locations. Additionally, TfL does not believe the case for providing car parking for the nearby Carphone Warehouse has been made. There is no policy support for this. The applicant will need to present a convincing argument for this proposal.

Delivery and Servicing

51 Off-street delivery and servicing comply with London Plan Policy T7. However, as discussed, 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. TfL will comment further when this is 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

52 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>.

53 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>.

Construction Logistics Plan, DLP and Travel Plan

54 The application must be accompanied by an outline CLP, DLP and Travel Plan. Details of what should be provided within the CLP, can be found here: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/freight>. 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

55 GLA officers once again welcome the opportunity to engage with the applicant on the emerging proposals for this site. The principle of the proposal remains supported in strategic planning terms, subject to the provision of high quality residential accommodation, the inclusion of high quality and functional public realm, and the provision of a threshold level of affordable housing that could meet with the fast-track requirements. The applicant should address comments made throughout this note and those previous, paying particular attention to the urban design and transport section with regards to residential quality, layout, public realm, microclimate, architecture, traffic and servicing.

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

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