

1 Portal Way, Acton, W3 6RS

Local Planning Authority: Old Oak and Park Royal Development Corporation

local planning authority reference: 21/0181/OUTOPDC

Strategic planning application stage 1 referral

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

The proposal

Hybrid application for the demolition of all buildings and the phased redevelopment of the site to provide a mixed-use scheme comprising residential (C3); co-living (Sui Generis); flexible commercial/Town Centre/ Uses floorspace (Use Class E); flexible sui-generis town centre and / leisure uses (pubs, wine bars, hot food take aways, and/or launderette); possible community uses and hotel, creation of a basement; car and cycle parking; associated landscaping including new public realm and servicing, associated infrastructure, and highway works.

The applicant

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

Strategic issues summary

Land use principles: The residential and mixed-use development including community and commercial uses (office, retail and food and beverage) and public open space accords with the land use principles set out in the London Plan and is strongly supported. (paragraphs 19 to 31).

Housing: The proposal will deliver a variety of new residential accommodation including Build to Rent and Co-living that will contribute to achieving a mixed and balanced community within North Acton town centre. The proposal includes an affordable housing offer that can follow the Fast Track Route. (paragraphs 32 to 50).

Urban Design: The site is considered suitable for tall buildings. The architectural approach raises no strategic concerns. The LPA should ensure that the scheme delivers the highest level of internal amenity for future residents, and that the scale and mass of the proposal does not prevent the delivery of high quality and usable public realm. The proposal would result in less than substantial harm to heritage assets, however, will not have an adverse impact upon strategic or locally important views. Fire safety issues must be resolved prior to Stage two (paragraphs 51 to 87) .

Transport: Mitigation required to address transport impacts identified by the Transport Assessment include a £4 million contribution towards North Acton station improvements and a £975,000 contribution towards increased bus capacity, consistent with other developments in the surrounding area. Active travel improvements should be secured, including improvements to the public realm, pavements and crossing facilities around the site, improvements to walking and cycling routes, as well as a contribution towards long-term improvements to the current gyratory.

The provision of standard car parking is not consistent with London Plan or local planning policies and should be replaced by Blue Badge car parking or used to provide higher quality cycle parking.(paragraphs 88 to 104).

Sustainability and Environment: Additional information concerning energy and whole-life cycle carbon is required. The applicant has illustrated a commitment to meeting circular economy objectives and the proposal is expected to meet with the urban greening requirements of the London Plan and enhance biodiversity on the site. (paragraphs 105 to 150).

Recommendation

That Old Oak and Park Royal Development Corporation be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 154 of this report. Possible remedies set out in this report could address these deficiencies. The Mayor does not need to be consulted again if the Corporation decides to refuse the application.

Context

1. On 23 November 2021 the Mayor of London received documents from Old Oak and Park Royal Development Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Corporation with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following categories of the Schedule to the Order 2008:
 - *1A 1 "Development which comprises or includes the provision of more than 150 houses, flats or houses and flats."*
 - *1B.1(c) "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres."*
 - *1C.1(c) "Development which comprises or includes the erection of a building where the building is more than 30 metres high and is outside the City of London."*
3. Once Old Oak and Park Royal Development Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; or, allow the Corporation to determine it itself.
4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
5. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

Site description

6. 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.

7. 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).
8. 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 Elizabeth Line services from 2022.
9. The site is served by six bus routes with the nearest stops located 120 metres away on Victoria Road, providing access to routes 218, 260, 266 and 487. Route 440 serves North Acton station and a stop on Western Avenue provides access to route 95. As such it is estimated that the site records a public transport access level (PTAL) of up to 5, on a scale of 1-6 where 6 is the highest.

Proposed Development

10. The planning application seeks hybrid planning permission for demolition of all of the buildings and structures on the site and the comprehensive redevelopment to provide a mixed use scheme including the following:
 - Up to 1,325 new homes (use class C3) in a range of unit sizes, including 35% affordable housing
 - 384 co-living units (Use Class Sui Generis)
 - Up to 56,606sqm of non-residential floorspace comprising of co-living, hotel and flexible commercial / community / town centre uses, including employment uses such as offices and flexible co-working space.
 - The creation of a new basement up to a maximum of 14,315sqm GEA for parking, waste, plant, and storage
 - Extensive new public realm including a new central public park and new access routes through and across the site
11. The breakdown of each element by building is described below:

Detailed Planning

12. The detailed element of the application comprises two buildings referred to as Phase One:
 - Building A - a single new building rising to ground plus 55 storeys, providing 300 Build to Rent (BtR) and 161 Discount Market Rent (DMR) residential units (Use Class C3) and 98sqm (GIA) of flexible commercial / community / town centre floorspace.

- Building F - a single building rising to ground plus 18 storeys, providing 384 co-living units (Use Class Sui Generis), 637sqm (GIA) of co-working space, and 128sqm (GIA) of flexible commercial / community / town centre uses.
- New open space including circa 0.43 hectares of new public realm including the majority of the central public green space, circa 378sq.m communal terraces on top of co-living building, around 800sq.m provided as playspace and approximately 1,410sq.m private residential amenity space.
- 1,087 cycle parking spaces

Outline element:

13. The outline element of the application comprises five buildings referred to as Phase Two:

- Building B – a single new building rising to a maximum of ground plus 18 storeys, providing up to 2,139sqm (GIA) of flexible commercial / community / town centre uses and up to 17,477sqm (GIA) of office and co-working floorspace
- Building C – a single building rising to a maximum of ground plus 50 storeys, provided up to 398 residential units including both market and intermediate for sale and up to 159sqm (GIA) flexible commercial / community / town centre use floorspace.
- Building D1 – a single building rising to a maximum of ground plus 16 storeys, providing up to a 260 key hotel (Class C1) or an alternative option to provide as up to 11,479sqm of office floorspace (GIA) and up to 174sqm (GIA) of flexible commercial / community floorspace / town centre uses
- Building D2 – a single building rising to a maximum of ground plus 6 storeys, providing up to 53 residential units as affordable housing and up to 1,452sqm (GIA) of flexible commercial / community / town centre floorspace
- Building E – a single building rising to a maximum of ground plus 50 storeys, providing up to 413 Build to Rent (BTR) with an element of Discount Market Rent (DMR) residential units and up to 242sqm of flexible commercial / community / town centre floorspace
- Provision of open space is also proposed as a central courtyard within Building D2 (270sqm) and up to 5,093sqm of private residential amenity space
- New public realm including the southern section of the central public green space
- Up to 1,642 cycle parking spaces, up to 106 vehicle parking spaces (44 of which will be blue badge spaces)

Case history

14. An extant consent exists on the site. In 2016, consent was granted (Ealing 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 sqm 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 (Ealing Council in this case) 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.

15. Three pre-application meetings have also been held with GLA regarding the current proposal. These pre-applications acknowledged that the proposed land uses meet with the London Plan and acknowledged that the site has been identified as being suitable for tall buildings and a new town square. Notwithstanding this, the acceptability of the proposal would be assessed against its visual, functional, environmental and cumulative impacts, its impacts upon transport infrastructure (including mitigation measures), sustainability credentials and also its contribution to meeting the overarching objectives of the opportunity area in which it is located.

Strategic planning issues and relevant policies and guidance

16. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Ealing Core Strategy (2012), Development Management DPD (2013), Development Sites DPD (2013) and, the London Plan 2021.
17. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance;
 - The Affordable Housing and Viability SPG
 - The draft Old Oak and Park Royal Local Plan (post submission modified version)
 - The Oak Park and Park Royal Opportunity Area Planning Framework;
18. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
 - Good Growth - London Plan;
 - Economic development - London Plan; the Mayor's Economic Development Strategy; Employment Action Plan;
 - Opportunity Area - London Plan;
 - Regeneration Area - London Plan; the Mayor's Economic Development Strategy;

- Housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Good Quality Homes for All Londoners draft LPG;
- Affordable housing - London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy;
- Co-living accommodation - London Plan, draft Large-Scale Purpose-Built Shared Living London Plan Guidance;
- Retail - London Plan;
- Office – London Plan
- Hotel, tourism and leisure – London Plan
- Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Housing SPG; Play and Informal Recreation SPG; Good Quality Homes for All Londoners draft LPG;
- Strategic views - London Plan, London View Management Framework SPG;
- Heritage - London Plan;
- Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG
- Sustainable development - London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; 'Be Seen' Energy Monitoring Guidance draft LPG; Mayor's Environment Strategy;
- Air quality - London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG;
- Ambient noise - London Plan; the Mayor's Environment Strategy;
- Transport and parking - London Plan; the Mayor's Transport Strategy;
- Equality - London Plan; the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG;
- Culture - London Plan; Mayor's Cultural Strategy;
- On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#).

Land use principles

19. The site is located within the Old Oak and Park Royal Opportunity Area. Policy SD1 of the London Plan seeks to promote growth in Opportunity Areas, including substantial numbers of new homes and jobs. 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 a brownfield allocated site that is suitable for mixed-use redevelopment including residential, office, town centre uses, new public realm and able to accommodate well designed tall buildings.
20. The proposed mixed use development includes residential use (including co-living), 17,934sq.m of commercial/co-working, 4,392sqm of flexible

commercial/community/town centre uses, a potential hotel and a significant area of public realm, which 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 the proposed significant area of public open space surrounded by commercial and residential uses could create a vibrant, civic centre to North Acton. The land use principles are thus supported.

Residential

21. 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.

Co-living accommodation

22. The submitted documentation includes co-living as a proposed land use. Policy H16 of the London Plan outlines the requirements for large-scale purpose-built 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. Recently published draft London Plan guidance on large-scale purpose-built shared living sets out key principles for the location, design and function of co-living schemes.
23. The site generally meets with the locational requirements for co-living accommodation and the applicant has stated that the operational elements of the accommodation will be compliant with Policy H16. As the proposed development also includes the delivery of significant amounts of conventional housing, including affordable units which helps meet an identified housing need, the principle for an element of co-living is considered acceptable as the overall housing mix proposed would contribute to a mixed community subject to the LPA appropriately securing a policy compliant co-living development. Officers are of the view that the principle of co-living accommodation in this instance is appropriate and would meet the requirements of the London Plan. Further comments on the design and function of the co-living element are offered in following sections of this report.

Employment

24. 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 of over 56,000sq.m of non-residential floorspace which will be delivered in both the full planning application and the outline. Much of this floorspace will consist of flexible office floor space to allow for a variety of employment activities to be located within this town centre location. The provision of new flexible office accommodation is therefore supported.

25. 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.
26. The proposal includes a range of commercial unit sizes to cater for a variety of uses including the opportunity for affordable studios for local artists. The range of units will provide an appropriate range of units for small, medium and larger commercial activities in accordance with Policy E2 of the London Plan.

Retail and leisure

27. Both phases of the proposed scheme include flexible commercial units that could be used for a variety of town centre uses such as food and beverage units, launderette, cinemas etc. Such uses will be used to activate the buildings at ground level and help them integrate with the new areas of public realm which is welcome and accords with the objectives of the opportunity area and town centre in line with Policies SD1 and SD6 of the London Plan. Such units also have the opportunity to support the night-time economy as outlined by Policies E9 and HC6 of the London Plan. Notwithstanding this, the balance of commercial uses should be carefully considered, including the quantum of retail floorspace and its potential impact on existing local centres. Further, the LPA should include conditions that require specific details on how such floorspace could be delivered to co-exist with noise sensitive land uses in the vicinity. In addition, as outlined in Policy E9 of the London Plan, hot food takeaway uses should not be located within 400 metres of a school and ideally comply with the Healthier Catering Commitment standards.

Hotel

28. A 260 room hotel has also been included as an option within the outline component of 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 considered an appropriate land use for the site.

Community uses

29. The proposal includes the possible inclusion of community floorspace such as health facilities within the scheme. Community uses have been specifically

earmarked for the upper ground floor of Building D2 which forms part of the outline application (Phase two), however the commercial units at the ground level of buildings A and F have also been identified as accommodating possible community uses. Policy S1 of the London Plan both seek to enhance social infrastructure to meet the needs of the growing population and encourage it to be accessible to all sections of the community. Policy S2 of the London Plan specifically relates to improving health and social care facilities and states that such facilities must be of a high quality and located in appropriate locations to support areas of identified need and encourages them to be in places with easy access to public transport, cycling and walking routes. With respect to the possible inclusion of a community facility such as a health care centre, GLA officers are of the view that the site is appropriate for a such a use and would accord with the requirements of Policies S1 and S2 of the London Plan.

Public realm

30. 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.

Land use principle conclusion

31. To conclude, the principle of the comprehensive redevelopment of this accessible site for residential and mixed-use development including community and commercial uses (office, retail and food and beverage) and public open space accords with the land use principles set out in the London Plan and is strongly supported.

Housing

32. The development would include the delivery of up to 1,325 residential units consisting of market sale units, affordable units and Build to Rent units. These units will be delivered as part of both phases. The proposal also includes 384 Co-living units that will form part of Phase One. A breakdown of the Class C3 residential units can be seen in table 1 below.

Residential Type	For Sale Housing (C3)			Build to Rent Housing (C3)			Combined Total
	Private Sale	Affordable	Total	Build to Rent	Affordable	Total	
Tenure							
Total Units	314	137	451	564	310	874	1,325
% Units	70%	30%	100%	65%	35%	100%	n/a
Total Habitable Rooms	788	427	1,215	1,232	679	1,911	3,126
% Habitable Rooms	65%	35%	100%	65%	35%	100%	n/a

Table 1 – Proposed Housing

Build to Rent (BtR)

33. The proposal includes 874 Build to Rent units. 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 BtR 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 BtR blocks (for example, Discount Market Rent or London Living Rent units), must be secured in perpetuity and should be genuinely affordable. Affordability is discussed further below.

Co-Living units

34. The proposal includes 384 co-living units. Policy H16 of the London Plan recognises that large-scale purpose-built shared living developments may provide an alternative housing option for single people in the private rented sector, alongside conventional self-contained housing accommodation and other forms of shared private rented accommodation available in the existing housing stock. This is subject to meeting the criteria set out in Policy H16 (discussed further within the urban design section below).

Affordable housing

35. All redevelopment proposals providing residential accommodation are expected to provide the fullest contribution to affordable housing. London Plan Policy H4 and the Mayor’s Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. London Plan Policy H5 and the Mayor’s SPG set out a ‘threshold approach’ whereby schemes meeting or exceeding a specific threshold of affordable housing by habitable room without public subsidy and which meet other criteria are not required to submit viability information to the GLA, nor would the development be subject to a late stage review mechanism.
36. London Plan Policy H6 and the Mayor’s Affordable Housing and Viability SPG set out a preferred tenure split for market housing schemes of at least 30% low cost rent (social or affordable rent, significantly less than 80% of market rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the local planning authority as low-cost rented homes or intermediate products based on identified need. There is a presumption that the 40 per cent to be decided by the borough will focus on low cost rent, however in some cases a

more flexible tenure may be appropriate, for example due to viability constraints or to achieve more mixed and inclusive communities.

37. For this site, the London Plan sets a threshold of 35% affordable housing in order to meet the “Fast Track Route”. The applicant proposes to meet this threshold by delivering a minimum of 35% affordable housing by habitable room over the entire scheme. This would include up to 447 units, made up of up to 137 units within the conventional housing and up to 310 units within the BtR housing.
38. In terms of tenure split, 55% of the conventional affordable housing will be London Affordable Rent with 45% Shared Ownership. The proposed mix for this component provides the minimum 30% element of low-cost rent and intermediate as set out in London Plan Policy H6. Although it does not strictly accord with the Ealing Council’s preferred tenure split of 60/40 in favour of social/affordable rent, the weighting towards genuinely affordable, low cost rented products is supported. It should also be noted that the draft OPDC Local Plan sets out a strategic tenure split target of 30% social rent and 70% intermediate accommodation, which is a material consideration with significant weight considering the advanced progress of the Local Plan. However, Ealing Council and OPDC should both confirm that they support the overall affordable housing tenure split in order for the scheme to be eligible to follow the Fast Track Route for conventional housing.
39. In terms of the BtR component, the affordable housing offer consists of 42% (94 units) London Living Rent units and 58% (216 units) Discount Market Rent units by habitable room. The mix generally accords with the requirements of Policy H11 of the London Plan and both Ealing Council’s and OPDC’s preferred tenure split.
40. Policy H16 of the London Plan requires large-scale purpose-built 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
41. The development would therefore be expected to provide the 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 would normally be subject to the Viability Tested Route set out in Policy H5 of the London Plan, however, developments which provide a contribution equal to 35 per cent of the units at a discount of 50 per cent of the market rent will not be subject to a Late Stage Viability Review. The applicant has agreed to make a financial contribution, equivalent to 35% of the co-living units at a discount of 50% per cent of market rent, in accordance with Policy H16. This must be secured by the LPA in the s106 agreement.
42. As part of the preapplication process, the applicant agreed 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 for each element, including the provision of 35% affordable housing and meeting the required tenure and affordability criteria. In this instance, given that the co-living element forms part of a wider mixed use scheme which is Fast Track compliant, and would provide a policy compliant contribution to conventional affordable housing, it is accepted that financial viability information need not be submitted in this case. The applicant has agreed a bespoke approach to the early stage reviews with GLA officers which should be further discussed and secured within the S106 agreement.

Genuinely affordable housing

43. The Mayor is committed to the delivery of genuinely affordable housing and Policy H6 of the Mayor's London Plan, the Mayor's Affordable Housing and Viability SPG and the Mayor's Affordable Homes Programme 2016-21 Funding Guidance set out the Mayor's preferred affordable housing products.
44. The applicant has confirmed that the affordable rented homes will be provided at London Affordable Rent levels as defined by the GLA. The benchmark rents are updated annually by the Mayor and are exclusive of service charges and that the units will be allocated to those on the Council's waiting list. With regards to the shared ownership homes, these will be provided on a range of gross household incomes up to £90,000 income cap as set by the GLA. The homes will be sold at a minimum 25% share, with up to 2.75% rent on unsold equity. The homes will be provided in line with the GLA requirements ensuring that housing costs equate to no more than 40% of net household income. For the BtR affordable housing units the applicant has stated that a minimum of 30% homes will be provided at London Living Rent levels (East Acton ward) and the remaining homes on a range of incomes up to £60,000 in line with GLA policy. A draft of the S106 agreement should be provided to GLA officers to review prior to any Stage 2 referral to allow officers to check that these requirements are met.
45. The S106 agreement must contain an early stage viability review to be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the LPA), as set out in the Mayor's Affordable Housing and Viability SPG and London Plan Policy H5. As above, early engagement with GLA officers on the draft S106 agreement should be provided to ensure appropriate wording for review mechanisms. It is noted that a late stage review would also be required if the scheme cannot follow the Fast Track Route.

Housing choice

46. London Plan Policy H10 encourages a full range of housing choice. It states that boroughs should provide guidance on the size of units required to ensure affordable housing meets identified needs. The proposal includes a mix of units ranging from studios to three bedroom family units. Specifically, of the proposed social rent units, 55% would be family-sized which is welcome. This level of family-sized low-cost rented housing could be supported in line with London Plan Policy H10, but the applicant should engage with the LPA to

ensure that this level of provision appropriately responds to local need for affordable family-sized housing.

47. All units achieve the minimum unit and room size targets set out in Table 3.1 of the London Plan.

Children's playspace

48. London Plan Policy S4 seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child that is not segregated by tenure.
49. The proposal would provide approximately 2,900sq.m of playspace across the site including 800sq.m of dedicated playspace within the first phase of the scheme. The playspace will consist of 536sq.m of playspace for 0 to 11 year olds and 2,367sq.m of playspace that is not age specific. The playspace exceeds that required by the London Plan's child yield from the Shaping Neighbourhoods: Play and Informal Recreation SPG of approximately 2,770sq.m. The applicant has stated that the approach to playspace is to create flexible spaces that do not segregate different age groups. The playable spaces will form part of the first (detailed) phase of the development and is intended to accommodate a variety of formal and informal play.
50. The Corporation should by way of condition ensure that playspace is suitable for all age groups and accords with the requirements of Policy S4 of the London Plan and is retained on the site for the benefit of all residents. If this cannot be achieved then a financial contribution towards off-site provision should be secured by way of legal obligation.

Urban design

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

Scale and massing (tall buildings)

52. The proposal includes a total of seven separate buildings, six of which are considered 'tall buildings', these range in height from 17 storeys to 56 storeys. The first detailed phase includes two buildings, Building A at 56 storeys and Building F and 19 storeys. The second, outline phase includes Building B at 19 storeys, Building C at 51 storeys, Building D1 at 17 storeys, storeys and Building E at 51 storeys. The second phase also includes the seven storey Building D2.

53. London Plan Policy D9 directs boroughs to identify what is defined as a tall building, and to identify the locations where tall buildings are suitable. The policy states that tall buildings should only be located in areas that have been identified by the borough as suitable. In this regard, the Ealing Core Strategy identifies North Acton as being suitable for tall buildings and as such the site is considered to meet the locational requirements of Policy D9 (Part B) of the London Plan. Although North Acton is a location where very tall buildings have been accepted in strategic terms, the visual, functional, environmental and cumulative impacts of the tall buildings in the area must also be considered in accordance with Part C of Policy D9 of the London Plan.
54. In terms of visual impact, although other very tall buildings have been consented in the area, how the tall buildings proposed relate to the built form hierarchy in both the immediate vicinity and also the broader context of North Acton must be carefully considered, particularly with regards to impacts upon key views, heritage assets and SINCS sites. In this regard, it is evident that considerable thought has been given to the layout and design of the tall buildings to achieve good quality floorspace and well-connected public realm. In terms of the built form relationship with nearby tall buildings, in broad terms, the location of the tall buildings on this site appears to form a logical height strategy for North Acton, considering the current and emerging built form in the area.
55. In terms of functional impact, the proposed tall buildings on the site will deliver a variety of land uses that are expected to contribute positively to how the North Acton centre functions as a town centre both in the local context and within London as a whole. Specifically, the tall buildings will deliver a significant amount of employment floorspace, civic and commercial uses, and also a variety of residential accommodation that will ensure the delivery of a mixed and balanced community within North Acton.
56. In terms of environmental and cumulative impacts, although it is acknowledged that the density of the scheme could be considered less than that of neighbouring sites, it is important to ensure that the cumulative impact of this number of very tall buildings in close proximity to the surrounding buildings (and emerging context) does not result in an quantum of built form that prevents the delivery of high quality public realm and results in poor amenity for future residents and visitors to the area with regards to wind, daylight and sunlight. The applicant's technical reports on these aspects will need to be fully analysed by the LPA, with any necessary mitigation measures secured.

Layout and public realm

57. The scheme has been designed around a 4,563 sq.m area of new public realm much the applicant describes as the 'Green Heart' of North Acton. This space will be connected to additional smaller public squares at each of the corners of the site. These areas of public realm will be the focal point of this proposal with buildings being designed around its perimeter.

58. The majority of the new public realm consisting of the western and northern sections of the 'Green Heart' will be delivered within the first 'detailed' phase of the project with the remaining sections to follow.
59. The new public realm will consist of six key areas to deliver a mix of open space that addresses the topography of the site and also deliver a variety of spaces that can be utilised for varying activities and users and also enhance biodiversity and urban greening on the site. The applicant has worked closely with stakeholders to ensure that the spaces are both functional and integrate with each other and the surrounding street network in order to deliver a high quality and usable new town square that addresses the needs of all those that will use the spaces such as residents, workers and visitors. Overall, given the central location of the site within North Acton, the layout of the new public realm is expected to improve connectivity within the town centre and provide a much needed area of public realm which is welcome.
60. Notwithstanding this, it must be ensured that there is sufficient space within the public realm adjacent to the ground level commercial units to allow for level external seating and pedestrian circulation, particularly with regards to units adjacent to Portal Way and the A4000. Further, GLA officers raise some concern with the extensive non-active street fronting facades including back-of-house, substation and waste storage areas at the base of Building A. It is suggested that the applicant reconsiders the ground floor layout to further activate this facade.
61. In accordance with the London Plan, 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 Public London Charter London Plan Guidance should also be considered in relation to this space.

Boundary treatment during construction

62. Given the expected significant project delivery timeframe, the LPA must ensure that the perimeter treatment of the site during construction is of the highest standards to ensure the amenity of the area is not unduly impacted upon. In this regard, the potential for meanwhile uses could be considered that could provide temporary public benefit and site activation during the various construction phases.

Architectural approach

63. London Plan Policies D1 and D2 seek to ensure that new developments are well-designed and fit into the local character of an area. New buildings and spaces should respond in terms of their form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment.
64. In general terms, although limited detailed information on the external appearance (with design narrative) has been provided, the colour pallet and general architectural approach to the site and variety of built form as a whole raises no strategic concerns as officers are of the view that the scheme is likely

to deliver a high-quality scheme that will sit comfortably within the emerging context of North Acton.

65. Notwithstanding the above, with respect to the buildings of the detailed first phase, the long linear floorplate of the co-living building (Building F), 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 applicant should consider the introduction of setbacks / recesses, particularly to the top of the building which could help create some additional architectural interest. Further, the middle of this building utilises a highly repetitive floorplate with the same (mirrored) room module repeated across the façade and then stacked vertically. Future design development should seek to introduce additional variety to reduce the overall perceived bulk of this building.

Internal layout and amenity of Phase One buildings

Residential Building (Building A)

66. With regard to this residential building, at the lower level, it is unclear what uses the amenity space is expected to provide especially given the constraining layout of the triangular floorplate with centralised core. This should continue to evolve to ensure that the amenity spaces provide a variety of flexible spaces to meet the needs of all residents (communal study spaces, relaxation, gyms and socialising).
67. On the upper levels it is noted that there are more than eight dwellings per floor. 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 not 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. In addition to this, 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) unit which should be addressed. It is noted that to compensate for the lack of external amenity space, that these units are larger than minimum, however given their layout and orientation, GLA officers would encourage further enhancements to improve the overall amenity levels of these units.

Co-living building (building F)

68. A total of 8 sq.m per person of communal amenity space would be provided, which is welcomed in line with the draft LSPBSL guidance. The amenity space makes up 18 percent of the floor area of the building and is distributed throughout the building. The amenity spaces includes communal lounges and terraces, library, gym, social spaces, fitness/well-being and shared workspaces. These spaces have also been designed to integrate with public realm to help activate it. Although the layout of communal amenity spaces appears logical and proportional for the intended uses, the success of co-living proposals is heavily dependent on the quality of the amenity spaces. Flexibility should be

intrinsic to these spaces to provide appropriate communal amenity for a wide variety of residents.

69. The individual room size would range from 23 to 28 sq.m and would provide adequate functional living space. It is particularly welcomed that communal kitchens and dining facilities are also located on the same floors as the co-living units (levels 2 to 17) as this helps to foster a sense of community within the development. Overall, it is considered that the quality of the co-living scheme is likely to be acceptable.

Heritage

70. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' and in relation to conservation areas, special attention must be paid to 'the desirability of preserving or enhancing the character or appearance of that area'. If it is judged that harm to the heritage asset/s would arise from the proposed development, considerable importance and weight must be attributed to that harm in order to comply with the statutory duties.
71. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and, the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. London Plan Policy HC1 states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.
72. The site does not contain any listed buildings and is not located within or in close proximity to any other heritage assets. Notwithstanding this, given the proposal includes a number of very tall buildings including three over 51 storeys in height, the proposal will be visible from much of west London and as such has the potential to impact upon heritage assets in the wider area.
73. A Townscape, Visual Impact and Heritage Assessment (TVIHA) was submitted as part of the submission documents. The TVIHA identifies potentially impacted heritage assets and outlines the extent (if any) such an impact the development would have upon such items. The initial study area for the assessment

extended one kilometre from the centre of the site. Notwithstanding this, given the scale of the proposal, a number of heritage assets that lay beyond this area were also considered.

74. No designated heritage listed buildings are located within the study area, as such the TVIHA considers the impact of the scheme on a number of Conservation Areas (CA) that are located in and around the study area. These include the Old Oak Lane Conservation Area (OOLCA), Canalside Conservation Area (CCA), the Grand Union Canal Conservation Area (GUCCA), the Old Oak and Wormholt Conservation Area (OOWCA), Acton Park Conservation Area (APCA) and the proposed Old Park Royal Conservation Area (OPRCA). The TVIHA considers these assets to be of medium sensitivity. Although there are no designated items within the study area, a number of locally listed buildings, buildings of local heritage interest and proposed areas of local character are located within the study area. The TVIHA states that due to the surrounding environment and the scale of regeneration in the area, these buildings are considered to be of low sensitivity. Given the nature and distance from the site along with the extensive changes occurring in the area, GLA officers agree with the TVIHA sensitivity assessment with regards to all heritage assets. It is noted that the impact of the scheme on locally listed heritage assets that fall within the CA outside the study area has been included as part of the impact upon the CA itself.
75. In its conclusion, the TVIHA states that the proposed development would be consistent with the existing context of heritage assets in the area which consists of a urban environment that has undergone considerable change since the post-war period and which includes large scale and tall post-war and modern developments. The TVIHA concludes that the completed development would have a neutral effect with regard to the settings of all heritage assets, and would not cause any harm to their heritage significance or appreciation of that heritage significance.
76. Although the scale of the proposal will be consistent with the emerging high density character of North Acton, when taking into consideration the statutory duties in relation to listed buildings and conservation areas and the relevant NPPF and London Plan policies in relation to heritage assets, GLA officers are of the view that given the extent of change resulting from the proposal to the setting of nearby Conservation Areas, the proposal would cause less than substantial harm to the significance of the Conservation Areas in the vicinity of the site. In accordance with paragraph 196 of the NPPF, where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In carrying out this balance, in accordance with the statutory requirements, great weight and importance should be attached to harm to designated assets.
77. Officers consider that the proposal could deliver substantial public benefits. As outlined above, the proposal would deliver a significant amount of new residential accommodation (including a significant number of affordable homes), employment space, flexible floor space for town centre uses and the delivery of a new town square. The land uses proposed will help deliver a mixed and balanced community, enhance accessibility within North Acton and

deliver much needed new high quality public realm. If appropriately secured and delivered through all future approvals, these matters would constitute a strong package of public benefits that could outweigh the harm identified to heritage assets. An update will therefore be provided to the Mayor at Stage 2.

Views

78. The site does not fall within any strategically significant viewing corridors. Notwithstanding this, given the scale and height of the proposal, it will be a dominant feature from many vantage points. To assess the visual impact of the proposal, the TVIHA demonstrates the proposals impact upon numerous views towards the site. The selected views were agreed with the LPA and included short, medium and long distance views. The assessment of impact upon local views has been undertaken following the principles of Policy HC4 of the London Plan.
79. With respect to long distance views, the TVIHA concluded that the proposal would form a coherent composition that would rationally consolidate the North Acton tall buildings cluster. In medium range views, the assessment stated that the proposal would frequently appear in a central position within the North Acton cluster and it would provide visual interest and act as a focal point for it. With respect to medium views, the TVIHA stated that medium and low rise buildings within the scheme would provide variety in the height and massing and that these along with the very tall buildings on the site would frequently appear in a central position within the North Acton cluster and would provide visual interest and act as a focal point for it. In short range views, the TVIHA states that the ordered nature of the architecture of the detailed buildings is expected to improve views by contributing positively to the surrounding streetscape.
80. Although the proposal would result in a significant increase in the built form within North Acton and will be visible from any vantage points, given the strategic objectives of the area together with its emerging character, GLA officers agree with the conclusions of the TVIHA with regards to the proposals impact upon views. As such, GLA officers are of the opinion that the scheme will not result in any unreasonable changes to views that would be out of context with the emerging character of the area. In terms of visual impact, the proposal satisfies the requirements of Policies HC3 and HC4 of the London Plan.

Fire safety

81. Both a fire statement and strategy were submitted as part of the submission. The fire strategy was prepared by an independent assessor and assesses the proposal against the objectives of Policy D12 of the London Plan.
82. The strategy confirms that the fire strategy will be prepared on the fire safety design codes, standards, best practice for high rise buildings and will align with the requirements of both Part A and Part B of Policy D12 of the London Plan. The statement outlines the approach (for all buildings) to means of escape, material selection to ensure the maximum protection against fire, access and

servicing for fire equipment, the siting of fire appliances, the suitability of water supply. The statement confirms that evacuation lifts will be provided to offer safe and dignified evacuation for all building users in accordance with the London Plan.

83. Whilst the submitted fire statement addresses the requirements of Policy D12 in terms of the content headings, it is noted that the scheme proposes very tall buildings with only one staircase per tower. As Policy D12 seeks the highest standards of fire safety in developments, as a minimum, it must be demonstrated how the number of common stair cores has been rigorously assessed based on the evacuation strategy, and if a stay-put strategy is proposed, what mitigation measures there are if occupants (including disabled occupants) choose to self-evacuate. The strategy to enable fire fighters to reach each floor in the event of a fire must also be fully explained. The London Fire Brigade (LFB) have recently raised objections to single-stair arrangements in proposed tall buildings elsewhere in London. Should the LFB raise any issues regarding this proposal these must also be fully addressed prior to the scheme being referred back to the Mayor at Stage 2.

Inclusive access

84. London Plan Policy D5 seeks to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum). Policy D7 requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
85. The submitted Design and Access Statement states that ten percent of the units within the development will meet with the Building Regulation requirements M4(3) and the remaining units (90%) will meet Building Regulation requirements M4(2) being 'accessible and adaptable dwellings'. Further, the applicant states that the communal areas including lifts have been designed to be step-free and will meet with M4(3) requirements. The applicant has also confirmed that at least one lift per core should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building as required by London Plan Policy D5 which is welcome.
86. Officers generally have no concerns about the accessibility of the public realm. However, the development must be designed to incorporate safe and dignified emergency evacuation.
87. The LPA should confirm that they are satisfied with the proposed unit split, layout and design of the units and secure M4(2) and M4(3) requirements by condition or planning obligation to ensure compliance with Policy D7.

Transport

Public transport and highway impacts

88. The Transport Assessment (TA) considers the impacts on bus, rail station and line capacity and on highways. There will be a substantial increase in bus capacity requirements due to the uplift in development compared to the consented scheme or the existing use. This will need to be mitigated through a contribution towards bus capacity improvements. The bus contribution is 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). Based on the evidence set out in the TA a contribution of £965,000 is sought towards increasing bus capacity, based on the need to provide two additional buses to accommodate increased peak hour demand for phases 1 and 2 of the development.
89. There are a number of flaws in the rail station and line capacity assessment although they will not affect the overall conclusions and it is accepted that the impact on Central line services can be accommodated. However, as demonstrated the impact of the proposed development on North Acton station ticket hall and gate lines requires mitigation.
90. 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). It should be noted that the access gate cannot be counted towards available capacity and the current arrangement of the ticket hall serves to reduce capacity further due to conflicting movements. The station cannot cater for the planned growth in demand and requires substantial improvements. TfL (with Ealing Council and OPDC) have undertaken a feasibility study, which indicated a cost in excess of £20 million for the required improvements. As such, financial contributions have been agreed for all recent developments in this locality using a standard methodology. Based on the total quantum of development for both phases it is expected that an overall contribution of approximately £4 million towards North Acton station improvements, based on the standard methodology and consistent with other developments. This comprises approximately £1.9 million to mitigate the impact of additional residential trips and approximately £2.1 million to mitigate the impact of additional employment trips (assuming the maximum quantum of 28,007 square metres of employment floorspace).
91. The A40 corridor currently suffers from severe congestion. The traffic impacts of the development will result from the proposed car parking for the retail store and retained spaces for Dixons Carphone as well as servicing and deliveries. Notwithstanding objections in relation to the proposed car parking, concern is also raised about the impact of the resulting additional trips car that will affect the gyratory and the A40 junction. These additional trips may prejudice plans for improvements to the gyratory and conflict with Healthy Streets principles and Vision Zero objectives. Mitigation will need to be provided in the form of

active travel improvements and/or a contribution towards long-term plans for the gyratory.

Vehicle access and car parking

92. It is noted that the 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 and should be removed.
93. A total of 106 vehicle parking spaces are proposed including 44 Blue Badge spaces. Forty Blue Badge spaces would be allocated to the residential use meeting the requirement for a minimum of 3% of residential units having access to a Blue Badge space from the outset in London Plan Policy T6.1. The remaining four Blue Badge spaces would be allocated to the non-residential uses. However, the provision of 62 standard spaces for the proposed food retail unit/ Dixons Carphone (as the existing site occupier) would be contrary to London Plan Policy T6 which states that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport.
94. At present, there is insufficient justification for providing any car parking for the food retail unit apart from Blue Badge spaces. The claim that the food store would attract car trips from areas beyond North Acton causes concern. North Acton is a local centre and retail provision should aim to serve a local catchment population that can access facilities through active travel or public transport. London Plan Policy T6.3 Retail Parking requires car free development with the exception of disabled persons parking in all areas of PTAL 5 or 6. The TA fails to make the case for an exception to be made in this well-connected location with a choice of non-car travel options which also experiences high levels of traffic congestion. Policy T6.3 does not differentiate between retail formats and there is no precedent set by existing retailers in North Acton which trade successfully without car parking.
95. The case made for providing car parking to serve the needs of Dixons Carphone who currently occupy the site is unclear. There is no indication in the submitted material that Dixons Carphone would occupy any of the proposed office space within the development and if they were to move to a nearby site the case for providing car parking would have to be judged on the basis of the new site. There is no case for providing any off-site parking for Dixons Carphone at 1 Portal Way when details of their planned relocation are unknown. Any need for car parking to serve the proposed office space at 1 Portal Way would be judged against London Plan Policy T6.2 Office Parking.
96. However, as the TA confirms, if all the standard parking spaces are re-allocated as accessible spaces, it would be possible to deliver a total of 85 Blue Badge spaces. Assuming 81 spaces are allocated to the residential use it would be possible to provide up to 6.1% of residential units with Blue Badge parking, closer to the 10% provision which needs to be demonstrated in the long-term to comply with London Plan Policy T6.1.

97. Because the food retail unit does not form part of the detailed first phase and the future location of Dixons Carphone is still uncertain, it is disputed that there is a case for providing any standard parking spaces. Either 85 accessible spaces are provided and restricted to Blue Badge users only, or the space that would have been taken up by standard car parking is used to enhance cycle parking.
98. Details of the location, design, allocation, management and enforcement of parking should be set out in a Parking Design and Management Plan which will need to be secured through a planning condition. Residents and occupiers should not be eligible for parking permits and this should be secured through a legal agreement.

Walking, cycling and Active Travel Zone

99. Following a series of pre-application meetings, the applicant has sought to improve walking and cycling routes through the site and the internal and external public realm strategy. This provides new connections and links to the existing network. In keeping with London Plan Policy T2 an Active Travel Zone (ATZ) Assessment has been submitted alongside the planning application and adjacent links have been assessed against Healthy Streets principles. The ATZ report has identified the key walking and cycle routes between the site and key destinations, such as North Acton station, Acton town centre, open space, places of worship and the local primary school. A number of areas for attention have been highlighted by the assessment and mitigation measures should be secured through section 106 and 278 agreements to carry out works or to provide funding. In particular the route to North Acton station and bus stops will need to be upgraded and enhanced. The proposed widening and raising of the existing signalised crossing in Portal Way to accommodate the anticipated increase in pedestrian and cycle movement is supported in principle. However, the traffic implications including the impact on bus services must be taken into consideration, assessed, and mitigated, as required. The applicant has suggested the use of Shared Surfaces on Portal Way within their submission. Due to the level of consented development in this area Shared Surfaces would not be suitable and therefore should not be used. All pedestrian walkways should have a raised element to demarcate them from the vehicle path, be continuous and in the most direct path. Similarly, cycleways should be provided with demarcation. The development should also make passive provision for improvement of the steps at the end of Portal Way which will link onto a pedestrian crossing over the A40.
100. The quantum of cycle parking is proposed to meet the minimum standards set out in London Plan Policy T5. A total provision of 2,728 spaces (2,622 long stay and 106 short stay) is proposed for the full development. To ensure compliance with London Plan policy, the detailed design, location and type of cycle parking will need to be secured through a planning condition which ensures that provision is consistent with London Cycling Design Standards (LCDS) guidance. The provision of short-stay cycle parking for visitors should be within the public realm while access to long-stay cycle parking in the basement should be by cycle lift. A dedicated cycle ramp at a suitable gradient can provide an

alternative in case of lift breakdown but it should not be used as the primary means of access. It is not acceptable for cyclists to have to share the car access due to potential safety and personal security issues. A minimum of 20% of cycle parking should take the form of Sheffield stands and an additional 5% should cater for adapted or larger cycles.

Travel planning

101. A framework Travel Plan has been included as an appendix to the TA. As with the Construction Logistics Strategy, it would be expected that the Travel Plan set out how mitigation measures and associated activities will be co-ordinated with other major developments and infrastructure projects. If any standard car parking is provided on a temporary basis, then it is expected that charges be applied to users, and that challenging targets are set to reduce car use and parking availability in a phased manner, to achieve the objective of a car free development.

Deliveries and servicing

102. Some concern is raised with the provision of on-street loading bays and potential taxi and coach pick/up drop off points on the periphery of the site on Portal Way and Wales Farm Road. Such an arrangement does not comply with London Plan Policy T7, which favours off-street servicing and delivery provision. We understand that Ealing officers have similar concerns.
103. The TA indicates that further work will need to be carried out on the design and location of vehicle pick up/drop off facilities to serve the development. Further information is required to demonstrate that the proposed loading bays and pick up/drop off facilities provide sufficient capacity, and are not provided at a detriment to pedestrians and cyclists in terms of space and safety when in use, are acceptable in terms of highway safety (demonstrated by vehicle tracking and road safety audits) and that their use will not give rise to unacceptable queuing on the gyratory. All proposals affecting surrounding streets and public realm must be agreed with Ealing Council highways officers and demonstrate compliance with the requirements of Policy T2 – Healthy Streets and the Mayor's Vision Zero ambition. Any issues not resolved will need to be dealt with through planning conditions. Further details of the location and dimensions of loading bays, turning and pick up/drop off facilities will be needed, supported by swept path analyses and safety audits. Maximising use of consolidation facilities and non-motorised forms of transport for last mile deliveries should form part of a Delivery and Servicing Strategy which will also need to be secured through a planning condition.

Construction logistics

104. A draft Construction Logistics Strategy has been included as an appendix to the TA. Further details of how construction arrivals and departures will be timed to avoid peak hour movements as well as proposals for the use of water, rail transport and consolidation sites for bulk loads should be provided. Due to the scale of development in the North Acton and wider Old Oak area a

collaborative approach with other major development and infrastructure projects such as HS2 including phasing of major works and shared use of logistics facilities and resources would be expected.

Sustainable development and Environment

Energy strategy

105. The energy strategy is generally compliant with the London Plan policies however, the applicant is required to submit the additional information, which has been outlined below.
106. The applicant's response to GLA's energy comments should be provided directly within this Energy Memo. Any wider supporting material submitted should be referenced within the applicant's memo response.
107. The applicant should submit the GLA's Carbon Emission Reporting spreadsheet in excel format which has been developed to allow the use of the updated SAP 10 emission factors alongside the SAP 2012 emission factors. The link to the spreadsheet can be found here:
<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>
108. The applicant should separate the outline element CO2 emissions into the domestic and non-domestic, for all stages of the energy hierarchy.

Be Lean

109. Based on the information provided, the detailed domestic element of the proposed development is estimated to achieve a reduction of 71 tonnes per annum (11%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development. The applicant should confirm the outline domestic Be Lean emissions.
110. Further, the LPA should include conditions that require the applicant to demonstrate as part of the reserved matters application a minimum 10% domestic Be Lean reduction in regulated CO2 emissions compared to a 2013 Building Regulations compliant development and to submit detailed energy modelling outputs (DER/TER Worksheets).
111. Studios in Block F are proposed to be served by electric underfloor heating as the applicant suggests they have low heat loads. Direct electric heating is not supported unless Passivhaus certification is proposed in order to quality assure the fabric performance. An alternative heating strategy should be proposed for these units.
112. Fabric performance gaps and user preferences can result in significant increases in energy costs when direct electric heating is specified; these can be minimised with a robustly quality assured fabric or more efficient heating

system i.e. heat pumps. Furthermore, the heat loads connected to the communal network should be maximised (as outlined further below).

113. Based on the information provided, the detailed non-domestic element of the proposed development is estimated to achieve a reduction of 14 tonnes per annum (15%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development. The applicant should confirm the outline non-domestic Be Lean emissions.
114. The applicant should be conditioned for reserved matters applications to demonstrate a minimum 15% non-domestic Be Lean reduction in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development and to submit detailed energy modelling outputs (BRUKL Worksheets).
115. The applicant should consider and minimise the estimated energy costs to occupants and outline how they are committed to protecting the consumer from high prices. This should cover the parameters set out in the guidance and include a confirmation of the quality assurance mechanisms that will be considered as part of the strategy.
116. The applicant should be conditioned for reserved matters applications to submit information to demonstrate they have considered and minimised the estimated energy costs to occupants and outline how they are committed to protecting the consumer from high prices. This should cover the parameters set out in the guidance and include a confirmation of the quality assurance mechanisms that will be considered as part of the strategy.

Overheating

117. The results of the Dynamic Overheating Analysis, using the CIBSE TM59 methodology, demonstrate that compliance with DSY1 is achieved assuming a g-value of 0.5, natural ventilation via acoustic louvres and balcony shading. This is aligned with an acoustic assessment.
118. The analysis demonstrates that there are a significant number of failures under the DSY 2 and DSY 3 weather files without active cooling. The applicant should commit to providing guidance to occupants on future minimising future dwelling overheating risk in line with the cooling hierarchy.
119. Active cooling is being proposed in the dwellings which they suggest will negate the risk of overheating against DSY2 and DSY3. However, the applicant has not sufficiently followed the cooling hierarchy. The applicant is required to investigate and adopt further passive measures (in line with the Cooling Hierarchy) to avoid the risk of overheating now and under future climate scenarios, including reducing the glazing g-value.
120. The applicant should confirm the total cooling consumption associated with the residential component.

121. The LPA should include conditions that require the applicant to demonstrate as part of the reserved matters applications that any active cooling provision is lower than the notional in (MJ/m²). They should be conditioned to undertake as part of the reserved matters application a Dynamic Overheating Analysis to assess the overheating risk for any naturally ventilated non-domestic spaces. This should follow the CIBSE TM52 methodology for the London Design Summer Year 1 (DSY1) weather file: 2020s, High emission, 50% percentile scenario. The applicant should also investigate the risk of overheating using the DSY 2 & 3 weather files.
122. The applicant should be conditioned to undertake as part of the reserved matters application a Dynamic Overheating Analysis to assess the overheating risk. This should follow the CIBSE TM59 methodology for the London Design Summer Year 1 (DSY1) weather file: 2020s, High emission, 50% percentile scenario. The applicant should also investigate the risk of overheating using the DSY 2 & 3 weather files.
123. The LPA should include conditions that require the applicant to demonstrate as part of the reserved matters applications that any active cooling provision is lower than the notional in (MJ/m²). They should be conditioned to undertake as part of the reserved matters application a Dynamic Overheating Analysis to assess the overheating risk for any naturally ventilated non-domestic spaces. This should follow the CIBSE TM52 methodology for the London Design Summer Year 1 (DSY1) weather file: 2020s, High emission, 50% percentile scenario. The applicant should also investigate the risk of overheating using the DSY 2 & 3 weather files.

Be Green

124. The applicant proposes 102sq.m of Photovoltaic (PV), but they suggest this will be re-evaluated when the outline roofs are designed. PV appears to be maximised to the roofs that have been illustrated in section 8.7.
125. However, indicative roof layouts should be provided for all roofs to indicatively demonstrate that the roof's potential for a PV installation has been maximised and clearly outlining any constraints to the provision of further PV, such as plant space or solar insolation levels. The applicant is expected to situate PV on any green/brown roof areas using biosolar arrangement and should indicate how PV can be integrated with any amenity areas.
126. The on-site savings from renewable energy technologies should be maximised regardless of the London Plan targets having been met.
127. The applicant should provide the capacity (kWp), total net area (m²) and annual output (kWh) of the proposed PV array.
128. The applicant should be conditioned to submit, as part of the reserved matters applications, a detailed roof layout demonstrating that the roof's potential for a PV installation has been maximised. The on-site savings from renewable energy technologies should be maximised regardless of the London Plan targets having been met.

129. The applicant should be conditioned to demonstrate prior to occupation that the PV installation has been maximised. The on-site savings from renewable energy technologies should be maximised regardless of the London Plan targets having been met.
130. Heat pumps are being proposed in the form of a (centralised) ambient loop system served by ASHPs and WSHPs for heating and cooling. The distribution loss factor will be 1.03. Further information on the heat pumps should be provided including:
- The percentage of contribution to the site's heat loads. They should demonstrate how the heat fraction from heat pump technologies has been maximised.
 - Details of the Seasonal Coefficient of Performance (SCOP) and/or Seasonal Energy Efficiency ratio (SEER) and how these have been calculated. This should incorporate the expected heat source and heat distribution temperatures (for space heat and hot water) and the distribution loss factor, which should be calculated based on the above information and used for calculation purposes.
131. As the site is in a Heat Network Priority Area and an ambient loop heat network is proposed, the applicant is required to demonstrate that relevant DHN stakeholders have been engaged to ensure that the proposals are compatible and commercially viable for future connection to district heating.
132. The applicant should be conditioned to, at the reserved matters stage, submit further information on the heat pumps including:
- The percentage of contribution to the site's heat loads. They should demonstrate how the heat fraction from heat pump technologies has been maximised.
 - Details of the Seasonal Coefficient of Performance (SCOP) and/or Seasonal Energy Efficiency ratio (SEER) and how these have been calculated. This should incorporate the expected heat source and heat distribution temperatures (for space heat and hot water) and the distribution loss factor, which should be calculated based on the above information and used for calculation purposes.

Be Seen

133. The applicant should review the 'Be Seen' energy monitoring guidance to ensure that they are fully aware of the relevant requirements to comply with the 'Be Seen' policy. The guidance is available here: <https://consult.london.gov.uk/be-seen-energy-monitoring>. A commitment has been provided that the development will be designed to enable post construction monitoring and that the information set out in the 'Be Seen' guidance is submitted to the GLA's portal at the appropriate reporting stages. This will be secured through suitable legal wording. The first submission of the planning stage data should be provided to the GLA through the be seen

planning stage webform (<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/be-seen-energy-monitoring-guidance>) at the planning submission stage, alongside the energy statement. The 'Be Seen' reporting spreadsheet has been developed to enable development teams to capture all data offline before this is submitted via the webform. The applicant has included planning stage data in the energy statement. They should confirm that the planning stage data has been submitted to GLA's webform.

Carbon shortfall

134. The applicant should confirm the carbon shortfall in tonnes CO₂ and the associated carbon offset payment that will be made to the borough. This should be calculated based on a net-zero carbon target for domestic and non-domestic proposals using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft s106 agreement should be submitted when available to evidence the agreement with the borough.

Whole Life Carbon

135. It is positive that the applicant, throughout Stage 1 has assessed several potential basement options, with a view to minimise embedded carbon. However, it appears that no Whole Life-cycle Carbon (WLC) assessment has been submitted. All applicants are expected to submit a completed WLC assessment template (as an Excel document, not a PDF) and follow the GLA WLC guidance; both of which are available here:

<https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>
136. The applicant should submit a WLC assessment template in full. This is important to allow results to be recorded and tracked through to the post-construction stages, and to allow a proper review of the results against material quantities and other assumptions made.
137. As per the GLA 'Whole Life-cycle Carbon Assessment – draft for consultation – guidance document' this assessment should comply with EN 15978 and cover all building elements.
138. Two assessments are required to be submitted through the GLA WLC template – one that does not account for decarbonisation of the grid (Assessment 1) and another that does account for decarbonisation to both operational and embodied carbon (Assessment 2). Carbon emissions during lifecycle modules A1-A5 and B1 of Assessment 2 should not include the decarbonised figures. Please refer to the GLA WLC guidance documents and RICS PS for more details.

Circular Economy

139. London Plan Good Growth objective GG5 states that those involved in planning and development should recognise and promote the benefits of transition to a circular economy as part of the aim for London to be a zero-carbon city by 2050. Policy D3 further states that the principles of the circular economy should be taken into account in the design of development proposals in line with the circular economy hierarchy. London Plan Policy SI7 requires major applications to develop Circular Economy Statements.
140. A Circular Economy Statement has been submitted in support of the application in accordance with London Plan Policy SI 7. The statement demonstrates how the design and construction of the proposal will address the challenges of the climate emergency through maximising resource efficiency and the adoption of a circular economy approach. Specifically, the statement outlines how the scheme has been designed to minimise waste and to ensure that resources are effectively used, responsibly sourced and effectively managed to reduced as far as possible in order to meet with the GLA's first principles of the circular economy. Further, the statement outlines the approach for future adaptation and flexibility of buildings to maximise longevity and also methods to manage waste in a sustainable manner. GLA officers are of the view that the approach outlined within the statement is generally consistent with that required of the London Plan. The LPA should ensure that initiatives outlined within any final version fully accords with the requirements of Policies D3 and SI 7 of the London Plan and that the strategy be secured as part of any consent issued.

Urban greening

141. London Plan Policy G1 encourages development proposals to incorporate elements of green infrastructure, which should be planned, designed, and managed in an integrated way to achieve multiple benefits. London Plan Policy G5 states that developments should include urban greening as a fundamental element of site and building design. Policy G5 also sets out a new Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments.
142. The landscaping strategy has been developed to progress through the stages of the project with the majority of the new public realm being delivered within the first phase of the scheme. In terms of proposed trees, an extensive landscape strategy has been prepared to deliver over 200 new trees. The applicant also states that the proposal also includes enhance ecological measures to provide a significant overall biodiversity net gain of 252.78%. The applicant has stated that this will be achieved through the rich flower planting, the planting of native trees, and offsetting the loss of non-native hedgerow will be through the incorporation of native shrubbery.
143. GLA officers are of the view that the proposed landscaping strategy over the various phases will enhance both biodiversity and ecology on this constrained highly urban site which is expected allow the urban wildlife to thrive. The LPA should appropriately secure the implementation of the landscaping strategy.

144. In accordance with Policy G5 of the London Plan, the applicant has calculated the Urban Greening Factor (UGF) score for the proposed development to be 0.42 which exceeds the 0.4 required by Policy G5 of London Plan and is welcome. Overall, the proposed urban green and biodiversity improvement is expected to meet with the requirement of G1 and G5 of the London Plan.

Sustainable drainage and flood risk

145. A flood risk assessment accompanied the submission. The assessment confirmed that the site is located within Flood Zone 1 and is at low risk of flooding from all sources.

146. The London Plan sets out the requirements for the use of sustainable drainage (SuDS) in London. It states that SuDS should be used unless there are practical reasons for not doing so and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. The proposed SuDS will consist of a combination of blue roof systems covering part of the roof terraces, tanked permeable surfaces and geocellular tanks located below the landscaped areas. Rainwater harvesting could also be used. Given the hybrid nature of the proposal, temporary surface water management systems will be used within the outline section to ensure that surface water is appropriately controlled and to avoid flooding. Overall, the Flood Risk Assessment states that the surface water discharge from the site will be reduced to the Greenfield runoff rates.

147. With regards to water efficiency, the applicant has stated that the proposed development would achieve at least a BREEAM excellent standard which accords with the requirements of Policy SI 5 of the London Plan and is welcome.

148. The Corporation should ensure that mitigation measures outlined within the Flood Risk Assessment should be secured by condition.

Air quality

149. An air quality assessment formed part of the Environmental statement accompanying the application. The assessment considered the impacts of the development both during construction and in operation. The assessment outlined baseline conditions that current exist at the site with regards to emissions, how the development would alter emissions directly and indirectly (demolition works, traffic generation, emissions from boilers and plant etc) and receptors and their sensitivity. The assessment also outlined mitigation measures (with scenarios) to reduce impacts upon air quality. The air quality assessment concluded that activities associated with demolition and construction phases are not expected to result in any significant effect to the local air quality. Furthermore, it is not expected that the traffic generated by the development and associated land uses will result in significant adverse impact upon air quality.

150. It is anticipated that impacts will be mitigated through the use of management plans (Construction Environmental Management Plan, Site Waste Management Plan, Construction Logistics Plan and Delivery and Service Plans). In order to comply with Policy SI 1 of the London Plan, the LPA should ensure that mitigation measures outlined within the air quality chapters of the Environmental Statement should be secured by condition.

Local planning authority's position

151. Old Oak and Park Royal Development Corporation planning officers are currently assessing the application. In due course the OPDC will formally consider the application at a planning committee meeting.

Legal considerations

152. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the OPDC must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the OPDC under Article 6 of the Order to refuse the application. In this case, the OPDC need not refer the application back to the Mayor if it resolves to refuse permission. There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

153. There are no financial considerations at this stage.

Conclusion

154. London Plan policies on housing, affordable housing, urban design, heritage, inclusive design, sustainable development, green infrastructure, and transport are relevant to this application. Whilst the proposal is supported in principle, the application does not currently fully comply with some of these policies, as summarised below:

- **Land Use Principles:** The residential and mixed-use development including community and commercial uses (office, retail and food and beverage) and public open space accords with the land use principles set out in the London Plan and is strongly supported.
- **Housing:** The proposal will deliver a variety of new residential accommodation including Build to Rent and Co-living that will contribute to achieving a mixed and balanced community within North Acton town centre.

The proposal includes an affordable housing offer that can follow the Fast Track Route.

- **Urban Design:** The site is considered suitable for tall buildings. The architectural approach raises no strategic concerns. The LPA should ensure that the scheme delivers the highest level of internal amenity for future residents, and that the scale and mass of the proposal does not prevent the delivery of high quality and usable public realm. The proposal would result in less than substantial harm to heritage assets, however will not have an adverse impact upon strategic or locally important views. Fire safety issues must be resolved prior to Stage two.
- **Transport:** Mitigation required to address transport impacts identified by the Transport Assessment include a £4 million contribution towards North Acton station improvements and a £975,000 contribution towards increased bus capacity, consistent with other developments in the surrounding area. Active travel improvements should be secured, including improvements to the public realm, pavements and crossing facilities around the site, the correction of any deficiencies in walking and cycling routes revealed by the ATZ Assessment, as well as a contribution towards long-term improvements to the current gyratory. The provision of standard car parking is not consistent with London Plan or local planning policies and should be replaced by Blue Badge car parking or used to provide higher quality cycle parking. Further information should be provided on deliveries, servicing and any vehicle pick up and drop off facilities. Planning conditions should be used to secure details of cycle parking compliant with LCDS, a Parking Design and Management Plan, Delivery and Servicing Plan, Construction Logistics Plan and Travel Plan.
- **Sustainability and Environment:** Additional information concerning energy and whole-life cycle carbon is required. The applicant has illustrated a commitment to meeting circular economy objectives and the proposal is expected to meet with the urban greening requirements of the London Plan and enhance biodiversity on the site.

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

Scott Schimanski, Principal Strategic Planner (case officer)

email: [REDACTED]

Katherine Wood, Team Leader – Development Management

email: [REDACTED]

Allison Flight, Deputy Head of Development Management

email: [REDACTED]

John Finlayson, Head of Development Management

email: [REDACTED]

Lucinda Turner, Assistant Director of Planning

email: [REDACTED]

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.