

# GREATER LONDON AUTHORITY

**Katie Crosby**  
Planning  
Ealing Council  
14 Uxbridge Rd  
Ealing  
London  
W5 2HL

**Department: Planning**  
Your reference: 192275FUL  
Our reference: GLA/4914/LB/01  
Date: 16 September 2019

Dear Katie Crosby

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

**Land to Rear of Tesco Superstore (Hoover Building), Western Avenue, Perivale**  
**Local planning authority reference: 192275FUL**

I refer to the copy of the above planning application, which was validated by us on 25 June 2019. On 16 September 2019, the Mayor considered a report on this proposal, reference GLA/4914/01. A copy of the report for the application is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not currently comply with the London Plan and draft London Plan, for the reasons set out in paragraph 69 of the above-mentioned report; but that provision of additional information and the resolution of the listed issues could lead to the application becoming compliant with the London Plan and draft London Plan.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Jordan Cousins, e-mail rachelyorke@tfl.gov.uk

Yours sincerely



*PP* **John Finlayson**  
Head of Development Management

cc Dr Onkar Sahota, London Assembly Constituency Member  
Nicky Gavron, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Lucinda Turner, TfL  
Paul Manning, Newsteer, 20 Farringdon Street, London EC4A 4EN

## Petrol station and land to the rear of the Hoover Building, Perivale

in the London Borough of Ealing  
planning application no. 192275FUL

### 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

Construction of a part 22-storey and part 10-storey residential building to accommodate 305 residential units (95 x studio, 99 x 1-bed, 94 x 2-bed, 17x 3-bed) with ancillary communal multi-use space (resident work spaces, reception areas, resident gym, resident lounges and guest bedroom to rent), basement car parking, refuse and cycle stores, landscaping and associated works including alterations to existing car park and access (following demolition of petrol filling station) and erection of sub-station.

### The applicant

The applicant is **Amro Real Estate Partners**, and the architect is **HTA**.

### Strategic issues summary

**Principle of development:** The principle of the loss of parking and petrol filling station and redevelopment for residential is strongly supported. (paragraphs 17-18).

**Housing and affordable housing:** The proposal includes a 35% affordable housing offer, however, the applicant is encouraged to amend the tenure split/affordability levels in order to benefit from the Fast Track Route; the scheme's viability is currently undergoing robust scrutiny. (paragraph 19-31).

**Urban design:** Whilst the proposed tall building is of high architectural quality, it remains to be demonstrated that the development would deliver an appropriate response to context. Specifically, a view of the proposal from the westbound footpath of the A40 should be provided. Play space should also be provided on site for under 5s. (paragraph 32-52).

**Transport:** The transport strategy is currently unsupported due to inadequate detail and assessment information; a lack of proposed safe active transport options/improvements and substandard cycle parking. Revisions are sought. (paragraph 53-59).

**Climate change:** Water and energy matters require resolution. (paragraph 60-64).

### Recommendation

That Ealing Council be advised that whilst the principle of residential redevelopment is supported, the application does not comply with the London Plan and draft London Plan, for the reasons set out in paragraph 69 of this report. The possible remedies set out in this paragraph could address these deficiencies.

## Context

1 On 25 July 2019, the Mayor of London received documents from Ealing Council 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 Council 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 Category 1C of the Mayor of London Order 2008:

- 1A – *'Development which comprises or includes the provision of more than 150 houses, flats or houses and flats';*
- 1C *"Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London."*

3 Once Ealing Council 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; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

5 The site is located just off Western Avenue (A40), in the London Borough of Ealing. The site is bounded by the railway to the north, primarily semi-detached low density residential housing to the east and west. To the south is a Tesco superstore which occupies The Old Hoover Building (Grade II\*), and has considerable car parking between the store and the site.

6 The site is characteristically suburban, being some 2.5km from Ealing town centre, with Perivale being the nearest neighbourhood centre.

7 Currently the site comprises a petrol station and surface level and basement car parking associated with the superstore.

8 The site is not within a Conservation Area but is situated north of The Grade II\* Listed Hoover Building and adjoining Canteen Block.

9 The site is within Flood Zone 1, with a medium risk of surface water flooding.

10 The site is located to the north of the existing Tesco Store. It is bound by London Underground Central Line tracks to the north, residential dwellings to the east and west, and the Tesco Store and A40 Western Avenue (TLRN) to the south. Perivale Underground Station, served by Central line services, is located approximately 750 metres west of the site, accessible within a 7 minute walk. GWR local services call at South Greenford train station, 1.7km west. Bus route X3 stops on the access road into the site, with a further two routes stopping approximately 450 metres south-east, and westbound services accessed by pedestrian bridge. Consequently the site has an average public transport access rating of 3 on a scale of 0 to 6b where 6b is the highest level.

11 Access to the proposed residential units would be via a modified existing site access road, off Bideford Avenue and Dawlish Avenue. At present, this leads to a shoppers' basement car park a part of which this proposal aims to convert into residential cycle and car parking. Non-vehicular access is proposed via the existing alley from Bideford Avenue.

## Details of the proposal

12 The scheme proposes redevelopment of the site to provide a residential led scheme of 305 residential Build to Rent units. The proposed buildings range from ten to 22 storeys in height and include resident facilities, internal and external amenity spaces, refuse storage and cycle and car parking.

## Case History

13 The applicant engaged in pre-application discussions with GLA officers between November 2018 and May 2019. The discussions concluded that the proposed redevelopment of the site to provide a residential-led scheme comprising 305 build to rent units is supported in principle. The scale and massing of the shoulder block is considered appropriate. The height of the tower should be reviewed and further justified in light of the heritage impact.

## Strategic planning issues and relevant policies and guidance

14 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Ealing Core Strategy DPD (2012), Development Management DPD (2013) and Development Sites DPD (2013), and the 2016 London Plan (Consolidated with alterations since 2011).

15 The following are also relevant material considerations:

- The National Planning Policy Framework 2019 and National Planning Practice Guidance.
- The Draft London Plan – Consolidated Suggested Changes Version (July 2019), which should be taken into account on the basis explained in the NPPF.
- In August 2017, the Mayor published his Affordable Housing and Viability Supplementary Planning Guidance. This must now be read subject to the decision in R (McCarthy & Stone) v. Mayor of London.

16 The relevant issues and corresponding policies are as follows:

- Principle of development *London Plan;*
- Housing & affordable housing *London Plan; Housing SPG; Housing Strategy; Affordable Housing & Viability SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context, draft SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;*
- Transport *London Plan; the Mayor's Transport Strategy.*

## **Principle of development**

17 London Plan Policy 3.3 and draft London Plan Policy H1 seek to increase the supply of housing in the capital. Policy H1 specifically identifies car parks and low-density retail parks as a source of capacity for housing delivery.

18 The proposals would provide 305 homes, which equates to 38% of Ealing's annual monitoring target of 798 in the London Plan (and 11% of the annual monitoring target of 2,807 set out in the draft London Plan). The principle of the proposed residential use on this accessible, previously developed site is strongly supported, subject to addressing the issues raised within this report. There is no objection to the loss of the petrol station or car parking use.

## **Housing and affordable housing**

19 London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 and Policy H6 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. and Policy H7 provides a flexibly prescribed tenure mix of: 30% social rent / London Affordable Rent; 30% intermediate products; and, 40% to be determined by the relevant local authority based on identified need and consistency with the definition of affordable housing.

20 The draft London Plan and the Mayor's Affordable Housing and Viability Supplementary Planning Guidance seek to increase the provision of affordable housing in London and embed affordable housing into land prices. The SPG introduced a threshold approach to viability, which is incorporated within draft London Plan Policy H6; schemes that provide 35% affordable housing by habitable room without public subsidy and that meet other criteria, including tenure, are not required to submit viability information to the GLA. Such applications are also exempted from a late stage review mechanism; this is known as the Fast Track route.

21 The Mayor's Affordable Housing & Viability SPG and Policy H13 of the draft London Plan provide specific guidance on Build to Rent (BTR) schemes. As a BTR scheme must meet the following criteria: be comprised of over 50 units; held in a covenant for at least 15 years; be subject to a clawback mechanism to apply in the event of the covenant being broken; under a unified management; and tenancies of three or more years must be made available. Policy H13 of the Draft London Plan Policy and the Mayor's Affordable Housing & Viability SPG also state that BTR schemes can provide an entirely intermediate rent affordable offer, where the rents proposed are at a genuinely affordable level. The preferred intermediate rent level for homes is London Living Rent, which is set at a third of local household income equating to two thirds of median local market rent. Please refer to the London Plan Annual Monitoring Report for up to date affordability. The remainder should be DMR up to the £60,000 income cap.

22 The application has stated that the scheme will deliver 35% affordable housing by habitable room. On the basis that a 35% affordable housing by habitable room offering is made by the applicant the scheme could qualify for the Fast Track Route in accordance with the Mayor's Affordable Housing and Viability SPG and the draft London Plan. The current balance of affordable housing tenures/affordability levels are not compliant with the Fast Track Route.

23 The mix is set out in the table below:

	<b>No. Units</b>	<b>No. HR</b>	<b>% of affordable tenure by HR</b>	<b>Overall % affordable by HR</b>
<b>Market</b>	221	420		<b>65%</b>
<b>Ealing Affordable Rent</b>	17	60	<b>27%</b>	<b>35%</b>
<b>DMR (80% of market rent)</b>	42	110	<b>49%</b>	
<b>London Living Rent</b>	25	53	<b>24%</b>	
<b>Total</b>	<b>305</b>	<b>643</b>		

24 The applicant has stated that all of the affordable rent tenure will be affordable to households on one or two combined incomes ranging from £25,000 to £60,000. Details of the actual proposed intermediate rents for discount market rent and Ealing Affordable Rent must therefore be submitted, demonstrating how this relates to the local housing allowance and London Living Rent levels. The applicant should note that London Living Rent is the Mayor’s preferred affordable housing tenure for BTR schemes.

25 It is noted that Ealing do not have a set Affordable Rent level and assess each scheme on a site by site basis.

26 The applicant is strongly encouraged to undertake further discussion with Ealing Council to identify an appropriate tenure and affordability balance in response to local need and the strategic principles of the Fast Track Route in order to take advantage of the Fast Track Route.

27 In order to qualify for the Fast Track Route, the applicant should investigate Mayoral grant funding opportunities as part of this process. As the application does not currently meet the Fast Track route, the financial viability assessment is being robustly scrutinised by GLA officers to ensure that the maximum level of affordable housing is provided.

28 In accordance with Policy H6 of the draft London Plan and the Mayor’s SPG, the S106 agreement must include an early stage viability review mechanism to be triggered if an agreed level of progress on implementation has not been made within two years of any planning permission. Moreover, if the proposals cannot be assessed under the Fast Track Route, a late stage review will also be required and secured within the S106. A draft of the S106 agreement must be agreed with GLA officers during the course of the application; example clauses are provided within the SPG.

29 The S106 must also secure the covenant period and clawback mechanism, and all affordable housing must be robustly secured in perpetuity. Ealing Council will be expected to publish any financial viability assessment, submitted to support a planning application, in accordance with the Mayor’s Affordable Housing and Viability SPG. GLA officers will ensure that the assessment is made available, to ensure transparency of information.

30 The draft S106 agreement must be submitted to and reviewed by GLA officers, who must agree its content prior to the application being referred back to the Mayor for Stage 2.

#### Housing mix

31 London Plan Policy 3.8 and draft London Plan Policy H12 encourage a full range of housing choice. Draft London Plan Policy H12 recognises that central or urban sites may be most appropriate for schemes with a significant number of one and two beds, whilst draft London Plan Policy H12 recognises that the number of family sized affordable homes provided should be driven by local and strategic need and should recognise that some families live in units smaller than three bedrooms. The proposed housing mix does not raise any strategic concerns.

### **Urban design**

#### Density and design scrutiny

32 In accordance with London Plan Policy 3.4 and Policy D6 of the draft London Plan, development proposals must make the most efficient use of land and be developed at the optimum density, informed by a design-led approach considering the site's context, connectivity and accessibility by walking and cycling and proximity to existing and planned public transport and the capacity of surrounding infrastructure.

33 The higher the density of a development, the greater the level of scrutiny that is required of its design, with particular regard to residential quality and standards and its ongoing management. Development proposals with a residential component that are referable to the Mayor and are above the density threshold or include a tall building (defined locally) must be subject to the particular design scrutiny requirements set out in part F of Policy D2, including appropriate design review.

34 The application density is 164.7 units per hectare and 347 habitable rooms per hectare and is therefore under the threshold for design security on the basis of density. Nevertheless, given that the proposals include a tall building of 22 storeys the highest standard of architectural quality is expected.

#### Residential quality

35 Build to rent units are required to have equally high residential quality as other dwellings.

36 The car park and railway line to each side of the site places potential constraints on achieving high quality of the residential units. As at pre-application stage, there is particular concern regarding the quality of the lower level units north east of the building. These sit close to the railway with higher land levels in front and high building mass above and adjacent.

37 The daylight and sunlight report concluded that the majority of the residential units within the proposed development comply with the BRE criteria and, therefore, are expected to receive adequate daylight and sunlight levels throughout the year. GLA officers recognise the rectangular shape of the site results in constraints but remain concerned about the overall residential quality of the north facing, single aspect units which have no outside space, and these should be reconsidered, with private outside space provided to mitigate.

38 The applicant was asked to provide information on how it addresses the Agent of Change principle, which places the responsibility for mitigating the impact of noise firmly on the new development, by ensuring good acoustic design in line with draft London Plan Policy D12. A noise and vibration statement has been submitted detailing that noise and vibration levels at the development will be acceptable for future occupiers of the scheme when incorporating the

recommendations of the report. The applicant should confirm that the report's recommendations have been fully incorporated.

39 There remains concern regarding the lengthy corridors connecting to the primary core. The principle of having one central core to suit the Build to Rent model is noted.

40 Two cores serve 22 units on the ground to tenth floors. Either core can be accessed by all of the 22 units. One core will be the principle access and the second will provide access to the gardens. The design of the corridor has been set out in the pre-application proposals, with mitigation taking the form of set backs to a pair of unit entrances and high quality interior design. GLA officers have concern about such a high number of units being served from these two cores, which averages 11 units per core, however if the high quality spaces can be secured, this could be considered acceptable in this instance.

41 Overall the residential quality shortfalls should be balanced with public benefits in the form of affordable housing.

### Height and mass

42 The architectural detailing of the building is developing to a high quality, with contemporary references to the Hoover building. Completing detailed specification at this stage is strongly advised to prevent a loss of quality through subsequent 'value engineering'. The borough should ensure that quality materials are robustly secured.

43 The height and mass of the building would be very prominent within Perivale's context, consisting largely of 2 storey houses: "Perivale is the smallest of the borough's neighbourhoods... The Future: Perivale will not be a major focus for growth and investment in the borough unlike neighbouring Greenford District Centre." p66, L B Ealing's Development (Core) Strategy.

44 Careful consideration must be made to the impact of this tall building onto the local context as well as the setting of the Hoover Building itself (refer below). It will significantly change the skyline and views within the neighbourhood and must positively contribute to the townscape. The applicant is encouraged to explore alternative configurations of massing to allow for reduced overall height, and to provide a more symmetrical form. The applicant is also encouraged to undertake an independent design review panel.

### Heritage

45 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should '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'. Any harm identified must be given considerable weight and importance.

46 The NPPF states that when considering the impact of the proposal on the significance of the designated heritage asset, great weight should be given to the asset's conservation. 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. Policy HC1 'Heritage conservation and growth' of the draft London Plan, as well as London Plan Policy 7.8, states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.

47 The application site itself does not fall within a conservation area, nor does it contain any listed buildings. It does fall within the setting of the Hoover building.

48 Historic England consider that the development would have a harmful impact on the setting of the main Grade II\* Hoover Building by appearing above its roofline in key views along Western Avenue and reducing the prominence of its monumental frontage and landmark character.

49 The key heritage concern relates to the impact of the tall part of the building on the views and setting of the Hoover Building. Further robust justification must be submitted in order to verify that there is not an unacceptable heritage impact. Before the GLA can take a firm position on the heritage impacts, we expect to see views from the opposite side (westbound) of the A40, as requested at pre-application stage, which, along with the eastbound carriage way views, are important to the setting of the Hoover Building. GLA officers are concerned about the impact on the Hoover building and any impact must be weighed up against appropriate provision of public benefits in the form of affordable housing.

#### Children's play space

50 Policy 3.6 of the London Plan and Policy S4 of the draft London Plan, seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-fives play space provided on-site as a minimum. The applicant is proposing a contribution in lieu of children's play space. Further details demonstrating full compliance should be provided in any application brought forward, with under 5s catered for on site.

#### Fire safety

51 In the interests of fire safety and to ensure the safety of all building users, Policy D11 of the draft London Plan seeks to ensure that development proposals achieve the highest standards of fire safety. The applicant has provided a statement that demonstrates that all features and materials would comply with Part B of the Building Regulations. This should be reviewed and its provisions secured by the Council.

#### Inclusive access

52 London Plan Policy 3.8 and Policy D5 of the draft London Plan require that ninety percent of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and ten per cent of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings', that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The proposals incorporate 34 wheelchair units, which meets and exceeds the 10% requirement. The applicant has also set out the compliant with building regulations.

## **Transport**

## Walking and Cycling

53 The present environment in and around the site is car-oriented with scant infrastructure or connections to encourage cycling and walking as required by draft London Plan T2 Healthy Streets. Legibility of routing is poor and a contribution towards Legible London-style signage will be sought. A clearer plan showing access routes, their widths and improvements is required together with a Healthy Streets assessment. TfL does not support the applicant's conclusion that the walking and cycling conditions are "fit for purpose" and that poor scoring of cycling routes is "primarily due to an absence of dedicated cycle infrastructure within the local highway network, which would not be appropriate at many of the routes assessed". This is unacceptable; a greater understanding of impacts, connectivity and necessary improvements to deliver the Healthy Streets Approach and Vision Zero aspirations are sought in compliance with draft London Plan Policy T2.

## Trip generation, mode share and public transport impacts

54 The trip generation and forecast mode share is acceptable and highlights the high proportion of trips by non-car modes, albeit at 3% for cycling the aspiration should be higher. There is considered to be sufficient bus capacity to accommodate this development. Further information on impacts to station capacity and lines is requested in order to understand any potential mitigation which may be needed.

55 The TA's vehicular operational capacity assessment of the 4-arm mini-roundabout of Bideford Avenue with the Tesco access and Dawlish Avenue concludes that the junction will continue to operate within capacity during both peak hour periods.

## Parking

56 A total of 45 residential car parking spaces including 15 disabled persons spaces (an acceptable ratio of 0.14) will replace 90 current shopper spaces. Some of the Blue Badge spaces have transfer zones where vehicles pass and should be redesigned, furthermore the electric vehicle charging spaces fall short of draft London Plan standards. The provision of motor cycle spaces (6) and car club spaces (2) is welcomed. Residents should be made exempt from any existing controlled parking zone by legal agreement and parking spaces should be leased. A parking management plan that also explains space and management given over to cycle storage is recommended to be conditioned.

57 A total of 466 cycle parking spaces will be provided within lift-accessible cycle stacker stores to the west and south of the building; to meet draft London Plan policy this quantity should be increased to 516 long-term spaces and the location of the required 9 short-term spaces should be confirmed. The design quality is poor with insufficiencies in space allowed for manoeuvring, larger bikes (should form 5% of spaces) and variety of stand design to meet the needs of people with a wide range of abilities, ages etc. Further discussion and redesign now rather than by condition is necessary for draft London Plan T5 and T6 policy compliance. It is suggested that additional space could be found from conversion of more shoppers' parking. Both long and short-term cycle parking must be safe, secure and ideally covered with good lighting and natural and CCTV surveillance.

## Infrastructure Protection

58 The site abuts railway infrastructure which imposes a number of potential restrictions on its redevelopment. Accordingly, any grant of planning permission must be subject to condition(s) to ensure that the development does not physically impact on existing London Underground transport infrastructure or the ability to maintain it, in accordance with strategic planning policy.

59 Furthermore, regard should be had to draft London Plan Policy D12 which seeks to protect existing 'noisy' land uses including transport operations from complaints and demands for change when adjacent uses change. It cites the Agent of Change principle and places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development. It would appear there are no north-facing balconies but clarification on openable doors/windows beside the railway is sought as well as a detailed noise assessment. Subject to the applicants confirmation that the recommendations of the noise and vibration report have been incorporated into the scheme to fully comply with the agent of change principle and minimise the risk of complaints for TfL's operations, the development can be considered acceptable in this regard. Arrangements should be in place to ensure that residents are aware when buying or renting a flat of the noise from the railway line day and night.

#### Servicing, Construction Logistics and MCIL2

60 Servicing will be on-site and accessed via controlled gates to the north. Additional detailed information regarding the servicing and construction logistic frameworks should be provided. These as well as a detailed Travel plan should be secured by conditions.

### **Climate change**

#### Energy

61 The Energy Hierarchy has broadly been followed; however, the applicant is required to review their energy proposals to ensure compliance with the London Plan policies:

- Further details on heat pump operation are requested;
- Confirmation of non-domestic heating strategy required; and
- Provide TM59 results for sample corridors based on the proposed strategy.

#### Water

62 A detailed report on flood risk, drainage and water has been issued under separate cover to the LPA and applicant. The key points requiring action are outlined below.

63 The approach to flood risk management for the proposed development complies with London Plan Policy 5.12 and draft London Plan Policy SI12.

64 The surface water drainage strategy for the proposed development does not comply with London Plan Policy 5.13 and draft Policy SI13, as it does not give appropriate regard to the drainage hierarchy and greenfield runoff rate. Further details on how SuDS measures at the top of the drainage hierarchy will be included in the development, and how greenfield runoff rate will be achieved should be provided. Applicant should calculate the site's Greenfield rates, and justify selecting 2 l/s as discharge rate.

65 The proposed development generally meets the requirements of London Plan Policy 5.15 and draft London Plan Policy SI5.

### **Local planning authority's position**

66 The Council's position on the application proposals is unknown at this stage.

### **Legal considerations**

67 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 Council 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 Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application(the next bit is optional).

68 There is no obligation at this present 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

69 There are no financial considerations at this stage.

## Conclusion

70 London Plan policies on housing and affordable housing; employment; urban design, inclusive design; transport; and climate change are relevant to this application. Whilst the principle of the development is supported, the application does not comply with the London Plan for the reasons set out below:

- **Principle of development:** The principle of the loss of parking and petrol filling station and redevelopment for residential is strongly supported.
- **Housing and affordable housing:** The proposal includes a 35% affordable housing offer, however, the applicant is encouraged to amend the tenure split/affordability levels in order to benefit from the Fast Track Route; the scheme's viability is currently undergoing robust scrutiny.
- **Urban design and residential quality:** Whilst the proposed tall building is of high architectural quality, it remains to be demonstrated that the development would deliver an appropriate response to context. Specifically, a view of the proposal from the westbound footpath of the A40 should be provided. Play space should also be provided on site for under 5s.
- **Transport:** The transport strategy is currently unsupported due to inadequate detail and assessment information; a lack of proposed safe active transport options/improvements and substandard cycle parking. Revisions are sought.
- **Climate change:** Water and energy matters require resolution.

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for further information, contact the GLA Planning Team:

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