

Percival House, 14-16 Uxbridge Road

in the London Borough of Ealing

local planning authority reference 203275FULR3

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

Full planning permission for the demolition of existing buildings and phased redevelopment in buildings of up to 26 storeys to provide a mixed-use development comprising 477 residential units; 16,324 sq.m of office space; 2,368 sq.m. library/customer service centre; 1,300 sq.m. of flexible commercial space; below ground ancillary space (plant, car and cycle parking); replacement sub-station; associated landscape and public realm works, and provision of new pedestrian and vehicle access.

The applicant

The applicant is **Emerald (Ealing) LLP** (comprising **Vistry Group** and the **London Borough of Ealing**) and the architects are **Patel Taylor** and **Trehearne**.

Strategic issues summary

Principle of development: The re-development of this well-connected site within a Metropolitan town centre for mixed residential and civic uses is strongly supported.

Housing and affordable housing: The 50.5% (habitable room) affordable housing offer, made up of 34% London Affordable Rent and 66% intermediate (20% London Living Rent and 46% Discount Market Rent) is welcomed. Although this does not meet the Council's specified tenure mix of 60% social or affordable rent and 40% intermediate, it is understood that the Council has agreed the tenure mix is acceptable. Should this be confirmed, the application can follow the fast track viability route, subject to confirmation of intermediate rents affordability. Further information is required on play space.

Urban design and historic environment: The proposals would include the tallest building in Ealing town centre, and would be prominent from surrounding streets; however, the heights proposed are broadly in line with planning policy in this highly accessible town centre location, and the visual, functional, environmental, and cumulative impacts have been rigorously assessed and are acceptable. 'Less than substantial' harm would be caused to the adjacent Grade II listed Town Hall, and Ealing Town Conservation Area; however, this is capable of being outweighed by the considerable public benefits of the scheme. The design is generally of a high quality; however, the material palette should be reduced, colours toned down, and detailing of building tops simplified. A fire statement is required.

Transport: The site is highly accessible with very good public transport access, and will result in a significant reduction in vehicle trips, which will benefit the adjoining road network. The proposal is supported, subject to securing public realm improvements, car park management plan, electric vehicle charging points, travel plan, delivery and servicing plan, and construction logistics plan.

Climate change and environment: Further information is required on energy, whole life-cycle carbon, circular economy, and water-related matters.

Recommendation

That Ealing Council be advised that the application does not yet comply with the London Plan and Intend to Publish London Plan for the reasons set out in paragraph 95.

Context

1. On 30 September 2020, 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 the following Categories of the Schedule to the Order 2008:
 - *Category 1A – 'Development which comprises or includes the provision of more than 150 houses, flats or houses and flats'.*
 - *Category 1B – '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'.*
 - *Category 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 environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended, 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 City Hall website: www.london.gov.uk.

Site description

6. The 1.36 hectare site is currently occupied by Perceval House, associated landscaping and its adjoining 121 space car park. The site also includes the Copley Dene substation and the pavements that line the western side of Longfield Avenue and the northern side of Uxbridge Road, including mature London Plane trees. Perceval House (1982) is of six storeys, used as Council Offices and a Customer Service Centre (21,927 sq.m.). Railway lines and associated embankments form the northern site boundary, Longfield Avenue the eastern boundary, Uxbridge Road the southern boundary, and an existing boundary wall to the west.
7. Beyond Longfield Avenue to the east is the locally listed 2 storey Old Fire Station building; the recently developed residential-led mixed use development at Dickens Yard, which rises to 15 storeys; and the Grade II listed Ealing Town Hall building fronting Uxbridge Road, which is 3-4 storeys plus a clocktower. To the south beyond Uxbridge Road are a range of 3-6 storey commercial/residential buildings; and the mixed use Filmworks development of up to 8 storeys, which is under construction. To

the west along Uxbridge Road are the Longfield House office building of up to 6 storeys and its private access road; a 7-8 storey hotel (with consent for an extension to 17 storeys); and the 21 storey Arc residential tower; with low rise semi-detached housing along Craven Avenue to the rear. Beyond the railway line to the north are residential buildings of up to 5 storeys.

8. The site is within Ealing (Metropolitan) town centre. There are a number of conservation areas in the surrounding area, namely Ealing Town Centre (directly adjacent across Longfield Avenue), Ealing Green (110 metres to the south), and Haven Green (90 metres to the north-east). Ealing Town Hall, immediately adjacent to the east, is Grade II listed; Christ the Saviour Church, 200 metres to the east, is Grade II* listed; and Longfield Avenue Old Fire Station, to the north-east across Longfield Avenue, is locally listed. The British Rail & Central Line to the north of the Site is a Green Corridor and Borough-level Site of Importance for Nature Conservation (SINC).

9. The site is subject to the following site-specific designations:

- Development Sites DPD: Site Allocation EAL7 (Longfield Avenue Car Park only) for residential development.
- Central Ealing Neighbourhood Plan: Policy CENP3 (Perceval House and Car Park) for residential development to facilitate the retention and re-provision of space for the local authority headquarters and customer service functions, plus appropriate supporting town centre uses including community/other public space such as library and/or health centre.

10. Uxbridge Road/New Broadway (A4020) is part of the Strategic Road Network (SRN), providing connections between Uxbridge to the west and Ealing Broadway to the east. The nearest part of the Transport for London Road Network (TLRN) is the North Circular Road (A406), approximately a kilometre to the east of the site, providing connections to the A40. There are a number of on and off-carriageway cycle routes in the vicinity of the site. An on-carriageway cycle lane runs along the north side of New Broadway and provides east-west connections to the wider cycle network.

11. The nearest station is Ealing Broadway, approximately 600 metres to the east of the site, which provides London Underground services via the Central and District lines. Ealing Broadway is also served by Great Western Railway and TfL rail services. TfL rail operating from this station will become part of the Elizabeth Line. The site has access to 15 bus routes, with numerous bus stops within 500 metres. The nearest bus stops are on New Broadway, Gordon Road and Castlebar Road. The site achieves a public transport access level (PTAL) of 6a, on a scale of 0-6b, where 6b is the highest.

Details of this proposal

12. The existing Perceval House building is no longer fit for purpose, being expensive to run and providing inefficient space that would require substantial investment to maintain and improve. The application seeks full planning permission for the demolition of existing buildings and phased redevelopment in buildings of up to 26 storeys to provide a mixed-use development comprising 477 residential units within six residential blocks, and civic centre with 16,324 sq.m of office space and a 2,368 sq.m. library/customer service centre. Flexible ground floor commercial space of 1,300 sq.m. is proposed fronting onto Uxbridge Road and at ground level in three of the residential blocks. Ancillary plant, car and cycle parking space is proposed underground. A

replacement sub-station would be provided at basement level. A hard landscaped undercroft public plaza is proposed in south-eastern corner of site beneath the projecting upper storeys of the civic centre; a hard/soft landscaped central courtyard; and soft landscaped 'Craven Gardens' in the northern part of the Site, incorporating an east-west pedestrian/cycle path, and vehicle turning heads at either end.

13. The proposed development would come forward over four phases:
- Phase 0: Decant and demolition of the southern part of the existing Perceval House, leaving the northern part of the building in use by the Council.
 - Phase 1: Construction of the new civic centre and southern part of basement; construction of residential buildings 1 (market tenure) and 2 (London Affordable Rent); and installation of public realm in the north-western part of the site.
 - Phase 2: Demolition of the remainder of Perceval House; construction of residential buildings 5 (London Affordable Rent and Discount Market Rent) and 6 (market tenure); remainder of main basement and central yard; and new substation becomes operational.
 - Phase 3: Removal of existing substation; construction of residential buildings 3 (London Living Rent) and 4 (market tenure); and delivery of remaining areas of public realm.

Case history

14. The Council launched a competition in 2017 to find a development partner to deliver a development that would provide a new Council building and make better use of the rest of the site. Vistry Partnerships (then Galliford Try Partnerships) was selected as the Council's development partner in July 2017 and a Development Agreement was signed in February 2019. In May 2019, pre-application discussions were held with GLA officers for *"the phased demolition of existing buildings and redevelopment of the site to provide comprehensive development comprising new Council Offices, Civic Centre and Library, flexible non-residential (Use Classes A1-A5/D2) and office (Use Class B1) floorspace and up to 500 residential (Class C3) dwellings, relocation of existing substation and provision of a new energy centre, along with associated highway, public realm and landscaping works"*. The pre-application advice report of 28 June 2019 stated that the principle of optimising the potential of this site to provide a new civic centre and high density residential use within this sustainable town centre location was strongly supported; the broad design principles were welcomed, including height and massing; and more information was requested on residential quality, inclusive design, sustainable development and transport. Further pre-application meetings were held in November 2019 and March 2020 and advice provided.

Strategic planning issues, relevant policies and guidance

15. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises Ealing Council's Development Strategy 2026 DPD (2012), Development Sites DPD (2013), and Development Management DPD (2013); Central Ealing Neighbourhood Plan (2017); and the 2016 London Plan (Consolidated with Alterations since 2011).

16. The following are relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;
- The London Plan - Intend to Publish Version (December 2019), which should be taken into account on the basis explained in the NPPF;
- Secretary of State Directions on the Intend to Publish London Plan issued 13 March 2020 under Section 337 of the Greater London Authority Act 1999 (as amended).

17. The relevant issues, corresponding strategic policies, and guidance, are as follows:

- Town centres *London Plan; Intend to Publish London Plan;*
- Social infrastructure *London Plan; Intend to Publish London Plan; Social infrastructure SPG*
- Housing *London Plan; Intend to Publish London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;*
- Affordable housing *London Plan; Intend to Publish London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG;*
- Urban design *London Plan; Intend to Publish London Plan; Shaping Neighbourhoods: Character and Context SPG; Play and Informal Recreation SPG;*
- Historic environment *London Plan; Intend to Publish London Plan;*
- Inclusive design *London Plan; Intend to Publish London Plan; Accessible London: achieving an inclusive environment SPG;*
- Climate change *London Plan; Intend to Publish London Plan; Sustainable Design and Construction SPG; London Environment Strategy;*
- Transport and parking *London Plan; Mayor's Transport Strategy.*

Principle of development

Town centre

18. The site is within Ealing (Metropolitan) town centre. London Plan Policies 2.10, 2.11, 4.2 and Policies SD6 and SD8 of the Intend to Publish London Plan support mixed used development in town centres. London Plan policies seek to enhance the vitality and viability of town centres by encouraging strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners, including main town centre uses, night-time economy, civic, community, social and residential uses. The Intend to Publish London Plan identifies Ealing town centre as having high commercial and residential growth potential.

19. Local site specific designations in the Development Sites DPD identify Site Allocation EAL7 (Longfield Avenue Car Park) for residential development; and Central Ealing Neighbourhood Plan Policy CENP3 (Perceval House and Car Park) for residential development to facilitate the retention and re-provision of space for the local authority headquarters and customer service functions, plus appropriate supporting town centre uses including other public space such as library or health centre.

20. The proposals for a mixed-use development comprising 477 residential units, a civic centre with 16,324 sq.m of re-provided space for the Council and a 2,368 sq.m. library/customer service centre; and flexible ground floor commercial space of 1,300 sq.m. are in accordance with these policies, as well as the site specific designations.

Housing supply

21. London Plan Policy 3.3 and Policy H1 of the Intend to Publish London Plan seek to optimise the potential for housing delivery, especially sites such as this that are PTAL 3-6, within a town centre. The proposal would make a significant contribution towards meeting the housing targets set for Ealing in the London Plan (1,297 homes per year) and the Intend to Publish London Plan (21,570 homes between 2019-29).

Social and community infrastructure

22. In line with London Plan Policy 3.16 and Policy S1 of the Intend to Publish London Plan, development proposals which provide high quality social infrastructure will be supported in light of local and strategic social infrastructure needs. Policy SD6 of the Intend to Publish London Plan states this to be particularly important in town centres, where the provision of social infrastructure should be enhanced, and facilities should be located in places that maximise footfall to surrounding town centre uses.

23. In line with the local site allocation CENP3 (Perceval House & Car Park), the proposal would re-provide the existing Council office use and local authority customer service functions, as well as a new library. The quantum of re-provided office floorspace has been informed by a demand assessment undertaken by the Council, which would result in the replacement of 21,927 sq.m. of office space with 18,692 sq.m. of floorspace in a new 'civic hub' providing rationalised, flexible workspace that can respond to the Council's future office requirements, while retaining existing levels of employment. This includes a replacement customer service centre; and a new library, which would relocate from Ealing Broadway Shopping Centre. The phased construction of the proposed development would enable the local authority functions to continue operating from the site during construction.

24. The proposed development includes the replacement of the surface level Copley Dene electricity substation to a basement location within the scheme. The phasing of the proposed development delivers the new substation within Phase 1, becoming operational prior to the start of Phase 3 when the current sub-station would be de-commissioned. Its relocation will ensure the continuity of the sub-station's vital function in providing power to 30,000 homes and ensure that the delivery of new homes on the site is optimised.

Principle of development conclusion

25. Overall, the development of this well-connected site within a town centre for mixed residential and civic uses is strongly supported, in line with London Plan and Intend to Publish London Plan Policies.

Housing

26. The following table shows the proposed residential mix and tenures:

	London Affordable Rent	London Living Rent	Discount Market Rent	Market sale	Total
Studio	0	0	0	22	22
1 bed	16	14	48	112	190
2 bed	47	31	63	117	258
3 bed	7	0	0	0	7
Total	70	45	111	251	477
50.5% affordable (hab rm) (34% affordable rent:64% intermediate)					

Affordable housing

27. London Plan Policies 3.11 and 3.12 and Policy H4 of the Intend to Publish London Plan seek to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. The Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) seeks 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 now incorporated within Policy H5 of the Intend to Publish London Plan. Schemes that provide the 35% threshold level of affordable housing on site, or 50% on public sector land, without public subsidy, having explored potential additionality through grant funding and which meet the specified tenure mix can follow the 'fast track route' and are not required to submit viability information or be subject to a late stage viability review.

28. As set out above, the applicant is proposing 50.5% affordable housing by habitable room, made up of 34% London Affordable Rent and 66% intermediate (20% London Living Rent and 46% Discount Market Rent). The proposed phasing will result in the early delivery of affordable housing within the first phase (London Affordable Rent) and within all phases, which is welcomed and should be secured by the Council with any planning permission.

29. The applicant's offer of 50.5% affordable housing is welcomed and the tenure split meets London Plan requirements. Although it does not meet the Council's specified tenure mix of 60% social or affordable rent and 40% intermediate, it is understood that the Council has agreed the tenure mix is acceptable, which should be confirmed.

30. The affordability of intermediate units must be in accordance with the Mayor's qualifying income levels, as set out in the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report, including a range of income thresholds. All intermediate rented products such as London Living Rent and Discounted Market Rent should be affordable to households on incomes of up to £60,000 per year. The applicant should confirm this and affordability thresholds must be secured in the section 106 agreement attached to any permission.

31. The use of grant funding has been fully explored prior to the submission of the application. The development agreement includes a provision for the Council to

purchase the proposed affordable homes, and the Council has agreed a grant funding arrangement with the GLA.

32. Once agreed, the proposed affordable housing must be appropriately secured in the section 106 agreement, including the relevant review mechanisms. A draft section 106 agreement would need to be shared with GLA officers for comment and agreement, prior to consideration of any Stage 2 referral.

Housing Mix

33. London Plan Policy 3.8 states that new development should provide a mix of housing sizes and types, considering local and strategic housing requirements, the needs of different groups, and the strategic priority for affordable family housing provision. Policy H10 of the Intend to Publish London Plan states that schemes should generally consist of a range of unit sizes and sets out several factors that should be considered when determining the appropriate housing mix of a scheme, including the nature and location of a site. This policy also states that a higher proportion of one- and two-bed units may be more appropriate in locations with higher public transport access and connectivity. For low-cost rent, Policy H10 states that boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs; however, Ealing does not currently set a prescribed unit mix.

34. As set out above, the proposed unit size mix includes 10% of the London Affordable Rent units as family sized three-bed units, with the majority being two-beds. Other tenures are made up of one and two bed units, with a small number of studios for market sale. It is understood that the mix has been developed through detailed discussions with the Council's housing department. Considering the town centre location, proximity to a station, PTAL, and characteristics and the density and form of the proposals, the proposed mix is appropriate and is supported.

Children's play space

35. Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Policy S4 of the Intend to Publish London Plan should incorporate high quality, accessible play provision for all ages, of at least 10 sq.m. per child. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this would address the needs of the development and can be provided nearby within an accessible and safe walking distance, and in these circumstances contributions to off-site provision should be secured by a section 106 agreement. On-site play space provision should be available to all housing tenures to promote social inclusion.

36. Using the GLA population yield calculator, the play space requirement is 1,294 sq.m for all ages. The proposals include 181 sq.m. of play space within the public realm, and 307 sq.m. on roof levels of all buildings, mainly for younger children, which represents a significant shortfall. Further detail should be provided on off-site facilities and routes to them, and financial contributions are likely to be required for off-site facilities.

Urban design

37. The design principles in Chapter 7 of the London Plan and Chapter 3 of the Intend to Publish London Plan require all developments to achieve a high standard of design. These policies seek to ensure that new buildings and spaces respond to local character, enhance the public realm, and are of the highest quality architecture such that they make a positive contribution to the street and cityscapes. London Plan Policies 7.1 and 7.4 and the Policies D1, D3 and D4 of the Intend to Publish London Plan in particular seek to ensure that new developments are well-designed and fit into the local character of an area, indicating that new buildings and spaces should respond to form, style and appearance to successfully integrate into the local character of an area.

Site layout

38. The proposed new Council building, with its civic and community functions is appropriately located fronting Uxbridge Road, aligned to the back of the existing pavement. This maintains the consistent and generous 8 metre pavement width and allows for additional street tree planting to reinforce the Council's 'boulevard' concept (Core Strategy Policy 2.5). Flexible commercial uses are proposed along Uxbridge Road, with the entrance to the civic building from the civic square to the east.

39. Within the site, three connected pedestrian spaces are proposed. A double height undercroft civic square is located on the corner of Uxbridge Road and Longfield Avenue providing an arrival space to the new civic building. This links to a new 'yard' to the rear of the civic building, between two linear residential mansion buildings with ground floor commercial units. This links to gardens running east-west between Craven Avenue and Longfield Avenue, with residential mansion blocks and the 26 storey tower to the north along the railway line. The spaces and the buildings proposed align well with neighbouring routes and buildings, reintroducing connections across the site.

40. The 'yard' is proposed with flexible commercial uses creating a 'loop' that completes a circuit through the adjacent Dickens Yard development. The proposed commercial spaces could include office, maker space and retail space, and are designed flexibly to meet the requirements of a range of uses, reducing vacancy risk. The 'yard' space also provides opportunities for programmed events.

41. The proposed buildings achieve a separation distance of at least 18 metres to surrounding residential buildings, other than Building B01, which is 1.5 metres from the western boundary and 3.5 metres from 63 Craven Avenue. However, this replicates the rhythm of gaps between semi-detached properties lining Craven Avenue, and the west elevation facing 63 Craven Avenue, is proposed as a solid gable brick wall to maintain privacy. Balconies at upper levels are aligned away from this elevation to the north and south.

42. Overall, the layout of the scheme is supported, and the landscaping of the public spaces proposed is of a very high quality, which should be robustly secured.

Optimising development capacity and residential density

43. London Plan Policy 3.4 and Policy D3 of the Intend to Publish London Plan encourage the optimisation of sites, having regard to local context, design principles,

public transport accessibility, and capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the development design, as described in Policy D4 of the Intend to Publish London Plan.

44. The density of the proposed scheme would be 476 units per hectare, which exceeds the relevant density range of 140-405 units per hectare as set out in Table 3.2 of the London Plan for sites with a PTAL of 4-6 and a central character setting. It also exceeds the threshold of 350 units per hectare set out in Policy D4 of the Intend to Publish London Plan, requiring a greater level of design scrutiny. The supporting text of London Plan Policy 3.4 confirms that the density matrix should not be applied mechanistically; however, the scheme would need to be of an exemplary design quality to justify densities above the upper range, as emphasised by Intend to Publish London Plan Policy D4. The scheme has been subject to design review and extensive pre-application discussions with Ealing Council and the GLA, and would optimise the development capacity of this site in a Metropolitan town centre, with very good accessibility. As detailed in this report, considering the high design quality of the scheme, the extensive design review during pre-application discussions, and the location and nature of the site, the density proposed is supported.

Tall buildings, height and massing

45. London Plan Policy 7.7 sets out requirements for tall buildings, broadly reflected in Policy D9 of the Intend to Publish London Plan, which states that development plans should define what is considered a tall building for specific localities and identify suitable locations. Requirements for tall buildings include addressing visual impacts at different distances; aiding legibility and wayfinding; having exemplary architecture and materials; avoiding harm to heritage assets; not causing adverse glare; and minimising light pollution. Functional impacts should consider internal and external design; servicing; entrance capacity; area and transport capacity; maximise benefits to the area; and not interfere with communications. Environmental impacts should consider wind, daylight, sunlight, and temperature; air movement (dispersal of pollutants); and noise creation. Cumulative impacts should also be considered.

46. Ealing Council's Core Strategy states that tall buildings (defined as substantially taller than their neighbours in the Council's Development Management DPD) may be suitable in Ealing town centre, with sites to be designated through the Development Sites DPD. Although Percival House is not identified in the Development Sites DPD, the Longfield Avenue car park part of the site is identified (EAL7), stating that lower elements should adjoin the existing residential development on Craven Avenue, with density massed towards Longfield Avenue and the increased scale of development at Dicken's Yard. The Neighbourhood Plan states that the height, scale and massing of Percival House and the car park (CENP3) should respect and enhance the setting of the adjacent Conservation Area and listed buildings, particularly the Town Hall; that the frontage to Uxbridge Road should be of a height consistent with buildings opposite or adjacent; buildings close to Craven Avenue should be in character with the prevailing 2-3 storey height; and that redevelopment elsewhere within the site should be of a height and scale that is not intrusive, dominant or overbearing when viewed from neighbouring residential buildings or from locations within and beyond the town centre.

47. The context of the site includes existing and consented tall buildings. In close proximity to the site is the Premier Inn hotel, which has consent for an extension to 17

storeys, while further along Uxbridge Road is the Arc residential tower of 21 storeys. Massing proposed on the northern part of the site comprises four residential buildings of a mansion block typology, stepping up in scale from Craven Avenue (3 storeys) towards a tower adjacent to Dickens Yard (26 storeys). The centre of the site will be occupied by two further mansion blocks of ten and eleven storeys, of similar height to the adjacent blocks within Dickens Yard, and of similar height to the civic block. Other than the 26 storey building, the massing is similar to Dickens Yard, which includes buildings of up to 15 storeys. The application demonstrates that alternative massing options have been considered; however, these created a more monolithic and solid appearance with consequential impacts on the environment in and around the site.

48. The applicant has provided a tall building assessment in line with Intend to Publish London Plan Policy D9, which is welcomed. The location of the 26 storey building in the north-east of the site marks one of the four links across the railway line from the north into the town centre and would aid wayfinding. It is also located furthest away from the existing two-storey housing on Craven Avenue to the west, and closest to the larger scale more recent development at Dickens Yard. It also minimises impacts on the most sensitive heritage assets; minimises the impact on daylight to existing residential properties; and allows sufficient daylight to dwellings and sunlight to public realm within the development. The articulation of the mass at upper levels into a series of layered planes contributes to its slender appearance, particularly when viewed from the north and from Walpole Park and heritage assets to the south. The reduction in the floor plates as the height increases also increases sky visibility and light to surrounding streets and buildings, as well as having a positive impact on wind flow.

49. London Plan Policy 7.6 requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, including light. Intend to Publish London Plan Policy D6 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context. The Housing SPG states that an appropriate degree of flexibility needs to be applied when using Building Research Establishment (BRE) guidelines to assess the daylight and sunlight impacts of new development on surrounding properties and within new developments, taking into account location, context, and broadly comparable housing typologies found in London. Similarly, amendments to the NPPF (2019) state that planning authorities should take a flexible approach when applying daylight and sunlight guidelines where these would inhibit making efficient use of a site and where an acceptable living standard would be achieved. The daylight and sunlight section of the Environmental Statement finds that the proposed development performs well in this respect, resulting in negligible effects to the majority of neighbouring properties, with only two properties experiencing major adverse effects for sunlight, and two for daylight.

50. Planning policy supports tall buildings in highly accessible town centre locations such as this. The proposals are in line with Site Allocation EAL7 of the Council's Development Sites DPD and Central Ealing Neighbourhood Plan Policy CENP3 by positioning the lower 3+ storey elements adjacent to the existing residential development on Craven Avenue, with massing increasing towards Longfield Avenue and Dicken's Yard. As discussed below, the civic building is considered to cause less than substantial harm to the adjacent Conservation Area and the Grade II listed Town Hall; however, the remainder of the proposals are of a height and scale that would not be overly dominant. The proposals would include the tallest building in Ealing town centre, and would be prominent when viewed from surrounding streets; however, the

heights proposed are broadly in line with planning policy in this highly accessible town centre location, and the visual, functional, environmental, and cumulative impacts have been rigorously assessed and are considered to be acceptable.

Historic environment

51. London Plan Policy 7.8 states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. Intend to Publish London Plan Policy HC1 seeks to ensure that development proposals affecting heritage assets, and their settings, should conserve their significance. These policies also apply to non-designated heritage assets.

52. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. Regarding 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 regarding conservation areas, special attention must be paid to “*the desirability of preserving or enhancing the character or appearance of that area*”. The NPPF states that when considering the impact of the proposal on the significance of a 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 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.

53. The applicant’s Townscape, Heritage and Visual Impact Assessment (THVIA) identifies heritage assets within the area and assesses the impact of the proposals upon them, including 20 verified views (and 18 supplementary views), with accurate wireline representations of the proposed development, and some fully rendered. Strategic views were scoped out at an early stage. While the site is not in a conservation area, nor does it contain any listed structures, it is adjacent to Ealing Town Centre Conservation Area, which contains statutorily listed and locally listed heritage assets. A Conservation Area Character Assessment was published 2007, from which the THVIA identifies the special interest as the urban form strongly defined by the main thoroughfares of The Mall, The Broadway and The New Broadway. The built form of the Conservation Area has a mainly Victorian and Edwardian character. Haven Green Conservation Area is 60 metres to the north-east of the site, beyond the railway lines, its special interest identified as strongly defined by the open space of Haven Green and the residential roads branching from it. Ealing Green Conservation Area is 85 metres to the south, with the special interest arising from the open spaces of Walpole Park and Ealing Green in the north, and St Mary’s Road and the buildings lining it to the south. Several other conservation areas are greater than 350 metres from the site.

54. Considering listed buildings, in closest proximity to the site is the Grade II listed Ealing Town Hall immediately to the east, a substantial three/four storey late nineteenth

century neo-Gothic building of ragstone, primarily experienced from New Broadway, although screened to a degree by mature Plane trees. Other listed buildings are a greater distance away, including the Grade I listed Pitzhanger Abbey and Grade II* listed bridge at the northern end of Walpole Park (itself Grade II listed), both approximately 250 metres to the south; and the Grade II* listed Church of Christ the Saviour, approximately 250 metres to the east in a prominent location at the junction of New Broadway, High Street and The Broadway. The THVIA identifies the latter's significance as deriving high value from its setting, and highly sensitive to change. Local heritage assets include the locally listed former fire station to the immediate east of the site.

55. The THVIA assesses the magnitude of impact and overall effect on all conservation areas as being negligible; with no or negligible effects on listed structures and landscapes. A pre-application response was issued by Historic England in June 2019, noting potential 'less than substantial harm' on the Grade II* listed bridge in Walpole Park within the Ealing Green Conservation Area; and the Grade II* listed Church of Christ the Saviour and the Grade II listed Town Hall, both of which are within the Ealing Town Centre Conservation Area. A further pre-application response was issued by Historic England in February 2020, which confirmed that the views expressed in the June 2019 response remained largely unchanged.

56. The 26 storey building would clearly be visible in views impacting the Grade II* listed bridge in Walpole Park within the Ealing Green Conservation Area; and the Grade II* listed Church of Christ the Saviour within the Ealing Town Centre Conservation Area; however, in both cases the settings of these heritage assets is made up of built and consented tall buildings in closer proximity, and the proposed building is some distance away. GLA officers consider that the building would not cause harm to the significance of these heritage assets. The stepped form of the building would result in a recessive form; however, detailed design should consider further lightening and simplification of materials at upper levels, particularly the proposed red terracotta, which would reduce the prominence of the buildings. The 26 storey building would be immediately adjacent to the locally listed Old Fire Station building, and would cause some harm to its setting; however, this harm is considered to be 'less than substantial'.

57. The proposed civic building is immediately adjacent to the Grade II listed Town Hall within Ealing Town Conservation Area, and is of greater massing than the existing building. It would diminish the presence of the Town Hall to a degree when viewed in close proximity from New Broadway to the east; and block views from the west, although it is acknowledged that mature trees limit these views to a large degree. GLA officers consider that 'less than substantial' harm would be caused to the Grade II listed Town Hall and to Ealing Town Conservation Area. No harm would be caused to other heritage assets.

58. Where a development will lead to 'less than substantial harm', the NPPF states that the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. GLA officers consider that substantial public benefits could arise from the development, and where appropriately secured, these would be sufficient to outweigh the less than substantial harm caused. These include:

- Replacement of an inefficient public building with energy-efficient buildings capable of future adaptation;

- Delivery of a high-quality, purpose-built civic centre, including offices, library and customer service centre;
- Creation of 477 homes, of which 50.5% would be affordable, with an appropriate mix of tenures and sizes;
- Provision of a new electricity sub-station supplying 30,000 homes;
- Creation of mixed commercial floorspace for a range of town centre uses;
- Provision of high quality public realm, incorporating extensive new planting, children's play space and amenity space;
- Improvement of pedestrian and cycle permeability across the site;
- Creation of a significant number of jobs during construction and in the operational stages of the development.

59. In coming to these conclusions, GLA officers have had special regard to the desirability of preserving listed buildings and their settings, and have paid special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Architecture and appearance

60. Facade articulation and materials are informed by the surrounding area. Similar materials, colour and detailed articulation to the local character and history are proposed. Key material characteristics adopted from the surrounding context include red brick, white horizontal components, lined window reveals, textured stone and articulated window surrounds. The stone of the adjacent Town Hall is reflected in buff coloured brickwork, patterned in key locations to respond to the rusticated stone facing of the Town Hall. Glazed red and green terracotta panelling is also proposed.

61. The materials of the residential blocks are considered to be overly complex, and the applicant is encouraged to simplify these facades with a reduced material palette, particularly the 26 storey building, the elevations of which appear overly complex. It is also suggested that the colours of the glazed terracotta should be toned down, particularly considering the prominence of these large buildings in the local area, and the sensitivity of neighbouring heritage assets. The massing of the 26 storey building includes projections at the lower levels on the southern and eastern elevations. The intention to relate the massing to the neighbouring mansion blocks creating a mid-rise street is understood; however, it is suggested that the relationship between the upper and lower sections of the building could be simplified and unified, both through materials and massing. Similarly, it is suggested that the tops of the buildings could be simplified.

62. The materials of the civic building are considered to be more successful. A glazed curtain wall system is proposed to the upper levels, forming a contemporary wrap on Uxbridge Road, including a brise soleil on east facade; with the lower levels primarily of buff coloured brick.

Residential quality

63. London Plan Policy 3.5 and Policy D6 of the Intend to Publish London Plan promote quality in new housing provision, with further standards and guidance set out in the Mayor's Housing SPG. Minimum quantitative standards for private internal space, private outdoor space and floor to ceiling heights apply to all tenures and types of self-contained housing.

64. The applicant has provided an analysis of the proposals against Housing SPG standards, which is welcomed, and generally shows very good levels of compliance. Residential layouts generally respond well to these standards, with extensive use of set-backs and through-units to achieve a very high proportion of dual and triple aspect units, with no single aspect north-facing units. Unit per core ratios generally achieve the maximum standard of 8 units. Although the linear blocks B05 and B06 exceed this with up to 11 units per core, it is accepted that introducing further cores would result in inefficient layouts. Separation distances between residential units generally achieve the suggested minimum of 18 metres. In some limited instances, separation is as close as 11 metres; however, these units are orientated to allow main living spaces to have generous alternative aspects, which would limit overlooking and allow sufficient privacy to be secured.

65. All homes are provided with external amenity, apart from 4 two-bed market homes at high level, which are provided with additional internal space to compensate. Additional shared external amenity space of 1,167 sq.m. is provided at roof level, plus 5,513 sq.m. at grade.

66. Some concerns were raised at pre-application stage about the proximity of lower level residential units along the northern boundary of the site with the railway line. No residential units are proposed at ground level in this location, with floor levels of first floor being 7-7.5 metres vertically above the railway level, and balconies 14.5 metres away horizontally. A detailed assessment of internal noise levels has been undertaken to ensure proposed external wall construction provides sufficient noise levels.

67. The residential quality of the proposals is supported.

Fire safety

68. Policy D12 of the Intend to Publish London Plan states that major applications should be accompanied by a fire statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Further to the above, Policy D5 of the Intend to Publish London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift to be used to evacuate people who require level access.

69. The proposals have been informed by fire statement developed by a specialist fire consultant. This is summarised in the Design and Access Statement; however, the applicant should provide the full statement (including an evacuation strategy and building management strategy). All buildings will have a suitably sized fire evacuation lift. The Council should then secure compliance with the agreed fire statement by condition.

Inclusive design

70. London Plan Policy 7.2 and Policy D5 of the Intend to Publish London Plan require that all new development achieves the highest standard of accessible and inclusive design and can be used safely, easily and with dignity by all. London Plan

Policy 3.8 and Policy D7 of the Intend to Publish London Plan requires that 90% of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% 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.

71. The applicant confirms that 10% of homes will be designed to meet the M4(3) standard for 'wheelchair user dwellings', with the remaining homes all designed to meet the Building Regulations M4(2) standard for 'accessible and adaptable dwellings'. This should be secured by condition as part of any planning permission. Proposed public realm levels slope down by 1.5 metres from northern end to southern end to enable accessible routes from adjoining street. The level difference is taken up by provision of a ramp with a 1:21 gradient within the central yard which forms the main accessible pedestrian route within the site. The application complies with London Plan Policies 3.8 and 7.2 and Policies D5 and D7 of the Intend to Publish London Plan.

Transport

Active Travel Zone (ATZ), Healthy Streets and Vision Zero

72. The findings of the ATZ assessment and Vision Zero assessment are accepted. The analysis shows that the routes assessed perform positively against the Healthy Streets indicators, generally with no areas for improvements. The scheme delivers (as illustrated by the landscape strategy) an enhanced environment for active modes, including new north-south and east-west routes through the site, which are supported in line with Intend to Publish London Plan Policy T2.

73. The accident analysis shows 11 personal injury accidents (PIAs) classified as serious. A number of these involved cyclists and pedestrians and occurred on New Broadway and High Street. The potential solutions suggested are supported, and in line with the Mayor's Vision Zero ambition, this should be given appropriate consideration by the Council. Funding towards any options to be taken forward should be secured through the appropriate legal agreement.

Access and parking

74. Pedestrian access would be significantly improved by the scheme.

75. A total of 40 parking spaces are proposed at basement level, with access via two vehicle lifts on Longfield Avenue. No standard parking spaces are proposed for either residential or office elements, which is strongly supported in accordance with Intend to Publish London Plan Policy T6. Car parking comprises 30 Blue Badge parking spaces, 8 operational spaces and 2 motorcycle spaces. Of these, 15 Blue Badge spaces are provided for the residential element. This satisfies the requirement of Intend to Publish London Plan Policy T6.1 for 3% from the outset. The proposal to reallocate 4 of the office Blue Badge spaces to residential should need arise is supported. This should be managed through a Parking Management Plan, which must be secured by legal agreement. The provision of two on-street Blue Badge spaces on Longfield Avenue is welcomed. The provision of additional on-street Blue Badge parking for the residential element should need arise should be investigated and agreed with the Council.

76. Intend to Publish London Plan policy-compliant levels of electric vehicle charging points (EVCP) must be provided for the residential and office elements, with 20% active and the remainder passive. The provisions for servicing and delivery at ground level, including access to the internal parts of the site at restricted times, are acceptable.

77. Cycle access will be via a dedicated cycle lift from Longfield Avenue. With 765 long-stay and 12 short-stay proposed for the residential element, and 247 long-stay and 41 short-stay spaces for the office element. The long-stay provision for the office element exceeds Intend to Publish London Plan Policy T5 standards. Owing to a redesign of the cycle stores to achieve the minimum aisle width, the long-stay provision for the residential element is now 83 less than required. However, cycle parking occupancy will be monitored through the Travel Plan and it has been demonstrated that an additional 92 cycle parking spaces could be achieved through the conversion of office Blue Badge parking, when required.

Trip Generation and Impacts

78. The trip generation analysis shows a significant reduction in vehicle trips compared to the existing site, due to the reduction of car parking spaces on the site. This will have huge benefits for the local highway network and air quality and is strongly supported. The additional bus trips will have no significant impacts on bus capacity. The additional rail trips are modest and will create no significant impacts on the station and rail services.

Agent of Change

79. Given the proximity of the site to railway, the proposed housing should include suitable protection against noise and vibration in line with the “agent of change” principle (Intend to Publish London Plan Policy D13). In particular, the balconies facing the railway are likely to experience an unavoidable level of noise from railway operations. The planning consent should therefore include suitable protection of railway operations (including maintenance) against noise and other complaints from occupiers of the development.

Travel Plan

80. The submitted Travel Plan is welcomed and generally acceptable. The final version and all agreed measures should be secured, enforced, monitored and reviewed through the section 106 agreement.

Delivery, servicing and construction logistics

81. A Construction Logistics Plan (CLP) should be secured by condition. Given other developments in the area, the CLP will need to include co-ordination arrangements to ensure management of cumulative impacts. A Delivery and Service Plan should be secured by condition and include consideration of the management of home deliveries.

Mayoral Community Infrastructure Levy

82. The development will be subject to Mayoral Community Infrastructure Levy 2 (MCIL2). The rate for the London Borough of Ealing is £60 per square metre of floorspace. The applicant should ensure they are fully aware of the regulations.

Climate change and environment

Energy

83. The applicant has submitted an energy assessment, which is generally in accordance with London Plan Policy 5.2 and Policy SI2 of the Intend to Publish London Plan. Further information has been requested on carbon emission reporting, energy costs to occupants, overheating, district heating, photovoltaics, heat pumps, modelling outputs, and 'be seen' monitoring. Detailed technical comments in respect of energy have been shared with the applicant and the Council.

Whole life-cycle carbon

84. Intend to Publish London Plan Policy SI2 states that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. A Whole Life-Cycle Carbon template (produced by the GLA) should be completed in accordance with the assessment guidance. The applicant should use these tools as the design progresses to calculate and reduce WLC emissions against the GLA's benchmarks provided in the guidance. The assessment guidance and template are available on the GLA website at: <https://consult.london.gov.uk/whole-life-cycle-carbon-assessments>.

Circular economy

85. Policy SI7 of the Intend to Publish London Plan requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, whilst Policy D3 requires development proposals to integrate circular economy principles as part of the design process. The GLA has released draft guidance for developers on how to prepare Circular Economy Statements and a 'Design for a circular economy' Primer that helps to explain the principles and benefits of circular economy projects. Therefore, a Circular Economy Statement is required in accordance with the GLA guidance, available at: <https://consult.london.gov.uk/circular-economy-statements>.

Flood risk

86. The site is in Flood Zone 1 and greater than 1 hectare in area. A Flood Risk Assessment (FRA) has been submitted as required under the NPPF. The FRA considers the risk of flooding from a range of sources. When mitigation measures are considered, the residual flood risk to the site is low. The approach to flood risk management for the proposed development complies with London Plan Policy 5.12 and Policy SI.12 of the Intend to Publish London Plan.

Sustainable drainage

87. The surface water drainage strategy provides an assessment of greenfield runoff rates, existing runoff rates, and attenuation storage required to restrict the 100 year (plus 40% climate change) post-development discharge rate. The strategy addresses the London Plan's drainage hierarchy, and notes that sedum roofs, swales, permeable paving, an underground tank and tree pit storage would be possible options, and that infiltration is not feasible due to the site geology. This approach does not satisfy the

requirements of London Plan Policy 5.13 and Policy SI.13 of the Intend to Publish London Plan as it does not give appropriate regard to the drainage hierarchy, namely infiltration. Further details should be provided on how SuDS measures at the top of the drainage hierarchy will be included in the development

88. The London Borough of Ealing's version of the London Sustainable Drainage Proforma should be completed. The proformas for all Local Authorities can be found here <https://www.london.gov.uk/what-we-do/environment/climate-change/surface-water/london-sustainable-drainage-proforma>.

Water efficiency

89. The proposed dwellings will have a maximum indoor water consumption of 105 l/person/day, in line with the optional standard in Part G of the Building Regulations, Policy 5.15 of the London Plan and Policy SI.5 of the Intend to Publish London Plan.

90. The proposed development generally meets the requirements of London Plan Policy 5.15 and Policy SI.5 of the Intend to Publish London Plan. Water harvesting and reuse should be considered to reduce consumption of wholesome water across the entire development site. This can be integrated with the surface water drainage system to provide a dual benefit.

Urban greening

91. Policy G5 of the Intend to Publish London Plan states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. A target score of 0.4 for developments that are predominately residential, and 0.3 for predominately commercial is recommended. The UGF figure for the proposed development is 0.23, which while below targets set in the draft London Plan, is in accordance with current London Plan Policy 5.10 and has been increased as far as possible through the design evolution process, taking account of the site's dense urban location, competing land use priorities and the multiple functions of the proposed public realm.

Local planning authority's position

92. Ealing Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

93. 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 (and any connected application). 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

94. There are no financial considerations at this stage.

Conclusion

95. London Plan and Intend to Publish London Plan policies on town centres, social infrastructure, housing, affordable housing, urban design, historic environment, transport, and climate change are relevant to this application. The following strategic planning issues should be addressed to ensure compliance with the London Plan and the Intend to Publish London Plan:

- **Principle of development:** The re-development of this well-connected site within a Metropolitan town centre for mixed residential and civic uses is strongly supported.
- **Housing and affordable housing:** The 50.5% (habitable room) affordable housing offer, made up of 34% London Affordable Rent and 66% intermediate (20% London Living Rent and 46% Discount Market Rent) is welcomed. Although this does not meet the Council's specified tenure mix of 60% social or affordable rent and 40% intermediate, it is understood that the Council has agreed the tenure mix is acceptable. Should this be confirmed, the application can follow the fast track viability route, subject to confirmation of intermediate rents affordability. Further information is required on play space.
- **Urban design and historic environment:** The proposals would include the tallest building in Ealing town centre, and would be prominent from surrounding streets; however, the heights proposed are broadly in line with planning policy in this highly accessible town centre location, and the visual, functional, environmental, and cumulative impacts have been rigorously assessed and are acceptable. 'Less than substantial' harm would be caused to the adjacent Grade II listed Town Hall, and Ealing Town Conservation Area; however, this is capable of being outweighed by the considerable public benefits of the scheme. The design is generally of a high quality; however, the material palette should be reduced, colours toned down, and detailing of building tops simplified. A fire statement is required.
- **Transport:** The site is highly accessible with very good public transport access, and will result in a significant reduction in vehicle trips, which will benefit the adjoining road network. The proposal is supported, subject to securing public realm improvements, car park management plan, electric vehicle charging points, travel plan, delivery and servicing plan, and construction logistics plan.
- **Climate change and environment:** Further information is required on energy, whole life-cycle carbon, circular economy, and water-related matters.

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