

Phoenix Academy

Local Planning Authority: Hammersmith and Fulham
Local Planning Authority reference: 2025/02541/FUL

Planning application

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

The proposal

Demolition of existing buildings and structures and comprehensive phased redevelopment of existing school site comprising:- erection of two new buildings ranging from 2-8 storeys containing 307no. residential units (Class C3); erection of one new school building of up to 5 storeys and alterations/refurbishment of existing buildings to provide 8,091 sqm (GIA) of educational floorspace (Class F1); creation of communal amenity space, landscaping, car parking, cycle parking, and other associated works.

The applicant

The applicants are **London Square** and **Future Academies Trust**.

Recommendation

It is recommended that the Deputy Mayor for Planning, Regeneration and the Fire Service, acting as Local Planning Authority for the purpose of determining this application:

- Grants conditional planning permission in respect of LPA application Ref. 2025/02541/FUL for the reasons set out in the approval section below, and subject to the prior completion of a Section 106 legal agreement.
- Delegates authority to the Interim Head of Development Management to issue the planning permission and attach, add, delete or vary, the final detailed wording of the conditions and informatives as required, with any material changes being referred back to the Deputy Mayor, and authority to negotiate, agree the final wording, and sign and execute, and complete the Section 106 legal agreement.
- Delegates authority to the Interim Head of Development Management to agree any variations to the proposed heads of terms for the Section 106 legal agreement.
- Delegates authority to the Interim Head of Development Management to refer it back to the Deputy Mayor if, by 28 December 2026, the Section 106 legal agreement has not been completed.
- Notes that approval of details pursuant to conditions imposed on the planning permission would be submitted to and determined by Hammersmith and Fulham Council.
- Notes that Hammersmith and Fulham would be responsible for the enforcement of the conditions attached to the planning permission.

Introduction

1. Having assumed authority to determine this planning application, this report sets out the matters that the Deputy Mayor for Planning, Regeneration and the Fire Service ('the Deputy Mayor') must consider in determining whether to grant or refuse planning permission, and to guide his decision making at the upcoming Representation Hearing. This report includes a recommendation from GLA officers, as set out below.

GLA Officer recommendation – reasons for approval

2. The Deputy Mayor acting as the local planning authority, has considered the circumstances of this application against national, strategic and local planning policy, relevant supplementary planning guidance and all material planning considerations. He has also had regard to Hammersmith and Fulham Council's Planning Applications Committee report dated 14 April 2026 and subsequent Addendum Report also dated 14 April 2026, the Planning Committee printed minutes setting out the reasons for refusal, and all statutory consultation responses and public representations made in respect of the case to Hammersmith and Fulham Council and the GLA.
3. The below reasons set out, in summary, why this application accords with the development plan overall:
 - (i) The proposed development would optimise the development potential of the site by delivering 307 new homes as well as enhanced educational facilities. The development would also provide new affordable housing in the form of 90 Social Rent units. The principle of the development is therefore supported in accordance with NPPF Policies S3 and S4, London Plan Objectives GG2 and GG4, and Local Plan Policy HO1.
 - (ii) The proposal would result in the net loss of 2,395 square metres of open space on the site, comprising existing sports facilities and amenity grassland related to the school. The net loss is offset by qualitative improvements to sports facilities/provision and outdoor amenity spaces on the campus, and the development would contribute to the strategic objectives of the Local Plan. The proposal therefore accords with NPPF Policy HC7, London Plan Policies G1 and S5, and Local Plan Policy OS2.
 - (iii) The development would deliver 37% affordable housing by habitable room, equivalent to 90 new dwellings, all of which would be Social Rent. In accordance with the GLA's Accelerating Housing Delivery Practice Note, the development is eligible to follow the Fast Track Route on an equivalency basis and is assumed to provide the maximum viable amount of affordable housing. This satisfies the requirements of NPPF Policy HO8, London Plan Policies H1, H5 and H6, and Local Plan Policy HO3.
 - (iv) The proposal demonstrates a high quality, design-led approach to site optimisation. The site layout, architecture, landscaping, and public realm proposals are well-considered and optimise the development capacity of the site whilst still providing an acceptable quality of new homes (including

accessible homes), external amenity, and play space in accordance with NPPF Policy DP3, London Plan Policies D3, D4, D5, D6, D7, D8 and D9 and Local Plan Policies DC1, DC2, DC3, HO11 and OS3.

- (v) The site is not within an area identified as suitable for tall buildings in the Local Plan and therefore does not meet the locational requirements of Part B of London Plan Policy D9. A detailed assessment of the visual, functional, environmental, and cumulative impacts of the new tall buildings has been undertaken, including the impact on local townscape views, and are found to be acceptable overall in accordance with Part C of London Plan Policy D9.
- (vi) The proposal would result in less than substantial harm to the character and appearance of the Wormholt and Old Oak Conservation Area. Any harm is contrary to Policy HC1 of the London Plan, however, in accordance with NPPF Policies HE4 and HE6, this harm has been weighed against the public benefits of the scheme, which clearly and convincingly outweigh the harm.
- (vii) The new trips generated by the development, of all modes, would not have a significant impact on the local highways network in view of its car-free residential approach, limited school parking, sustainable travel measures and mitigation contributions. Operational, servicing and highways matters are controlled through the attached conditions and obligations. Therefore, the proposal complies with NPPF Policy TR4, London Plan Policies T1–T7 and Local Plan Policies T1–T7 and CC7.
- (viii) The development would result in some impacts to neighbours, including a loss of daylight to a limited number of properties. Some of the affected properties have existing building features that already limit daylight to certain windows/rooms, and the scale of the impact is relatively large given the open nature of the existing site, which is exceptional for an inner London borough. Given the limited nature of the effects and the public benefits arising from the development, the overall planning balance is considered to be acceptable, and no objections are raised in terms of NPPF Policy P3, London Plan Policy D6, and Local Plan Policies DC1, DC2, DC3 and HO11 as well as Key Principles HS6 and HS7 of the Planning Guidance SPD.
- (ix) The proposal has demonstrated that a good standard of sustainability would be achieved, using on-site energy efficient construction, renewable energy generation, and low-carbon space heating and hot water supply in accordance with the London Plan energy hierarchy to minimise carbon emissions beyond the 2021 Building Regulations standard. The proposal would also deliver sustainable urban drainage, ecology, urban greening benefits and acceptable air quality and would comply with NPPF Policies F4, F5, N2, and P2, London Plan Policies G5, SI1, SI2 and SI12 and Local Plan Policies OS1, OS5, CC1, CC3, CC4, CC9, CC10.
- (x) Appropriate, relevant, reasonable and necessary planning conditions and obligations are proposed to ensure that the proposal is acceptable in planning terms, and the environmental impacts identified within the

Environmental Statement are mitigated, in line with the policies of the NPPF, the London Plan, and the Local Plan.

(xi) Applying section 38(6) of the 2004 Act, it is GLA officers' view that the proposal accords with the development plan, read as a whole and that material considerations, when taken together, do not justify a departure from the plan but rather confirm that the proposals should be granted planning permission.

S106 legal agreement

4. The Section 106 legal agreement includes the following planning obligations:

- 90 Social Rent homes with appropriate controls on affordability and eligibility.
- Travel Plans and associated monitoring fees for the operational phases of the residential and school developments as well as Demolition/Construction workers.
- Monitoring and compliance fees for the Demolition and Construction Management Plan, Demolition and Construction Logistics Plan, and Delivery and Servicing Plans (include Waste Management) for the residential and school developments and cycle training and maintenance for the school development.
- Total carbon offset payment of £339,550 in accordance with the GLA's pricing of £95 per tonne.
- GLA 'Be Seen' energy monitoring.
- New residential occupiers to be ineligible to hold Parking Permits.
- Contribution of £152,750 towards skills, employment and local procurement in the borough.
- Contribution of £24,975 towards off-site children's play space enhancements.
- Contribution of £36,000 towards Step Free Access provision at White City Underground Station and £150,000 towards active travel improvements in the vicinity of the site.
- Contribution of £386,294 towards NHS healthcare provision, including at Hammersmith Hospital and local GP services.
- Requirement to enter into a Section 278 agreement to allow for necessary works to the public highway.
- A two-tier occupation restriction for the residential units to ensure delivery of Phoenix Academy and associated public benefits.

Conditions

5. The draft list of conditions recommended to be attached to the planning permission if granted is included Appendix 1 of this report.

Site description and surrounding area

6. Phoenix Academy is an Ofsted 'Outstanding' secondary school and Sixth Form that occupies a site of 2.96 ha on the northern side of The Curve. The main school buildings are arranged around a courtyard area and vary in height up to five storeys. Most of the buildings date from the mid-twentieth century and are in varying states of repair, but the 'Vibe' building and the Technology Building are considerably newer. Sports pitches and facilities surround the main buildings (Figure 1, below).



Figure 1: Aerial image of existing Phoenix Academy site

7. Adjoining the application site to the east is the Phoenix Fitness Centre and Janet Adegoke Swimming Pool which shares certain facilities with Phoenix Academy. To the south is Cambridge School, and to the east of Cambridge School are community allotments (sometimes known as Phoenix Farm). Two-storey houses and mid-rise flats blocks adjoin the south-western, western, and northern boundaries of the application site.
8. The site is within the Old Oak and Wormholt Conservation Area, and the Cleverly Estate Conservation Area lies approximately 235m to the southwest of the site. Cambridge School is a locally listed Building of Merit, and the Grade II Listed former Wormholt Library and Infant Welfare Centre are approximately 225m to the northwest of the site.
9. The main part of the site has a Public Transport Accessibility Level (PTAL) rating of 1b according to TfL's methodology, on a scale of 1-6b where 1 is the lowest and 6b is the highest. The nearest available public transport is a bus stop on the eastern side of Bloemfontein Road which is served by a bus route to

Hammersmith. White City and East Acton Underground stations are both approximately 15 minutes' walk from the site.

Details of the proposal

10. The application is a joint proposal from Future Academies Trust, which operates Phoenix Academy, and the residential developer London Square.
11. Full planning permission is sought for demolition of certain existing buildings and structures on the school site and construction of a new residential development on the western part of the site which would act as enabling development to fund the construction of new school buildings, facilities and sports provision for Phoenix Academy on the eastern part of the site. The funds to redevelop the school would be provided to Future Academies as a one-off land payment from London Square, with the Trust independently taking forward the school building works.
12. The existing Vibe Building and Technology block are both less than 25 years old and are to be retained and refurbished, with minor external and internal alterations. The older, 1950s buildings, will be demolished and replaced with a new teaching block and a 3-court sports hall. The retained and new facilities combined will result in c. 8,000 square metres of Class F1 educational space. The new school buildings would be arranged around a central courtyard with sports and recreation and facilities to the north. The main entrance to the school would be in a similar location to the existing entrance, at the junction of The Curve and Erica Street. The existing campus was constructed in the mid-20th century to accommodate around 1,300 pupils, but this represents a historical requirement that no longer bears any relationship to present-day demand for places at Phoenix Academy. Nevertheless, the new school would be capable of accommodating significant growth, up to a maximum of 900 students and 80 staff, compared to existing school rolls of c.540 pupils.
13. The redevelopment would be phased to allow the school to remain open during construction works and there would be no requirement to accommodate pupils off-site during this time.
14. The new residential development would consist of 307 new flats within two buildings with stepped massing of between 5 and 8 storeys (plus rooftop plant space), arranged around two central courtyards which would provide residents-only communal amenity space. 90 of the new homes would be Social Rent affordable housing. Access for all new residents would be via a shared pedestrian and vehicle route immediately to the east of No.39 The Curve.
15. The proposals also include the alteration of existing buildings on site, together with private and communal amenity space, landscaping, car parking, cycle parking, and other associated works.

Application timeline

Pre-application

16. The proposal was subject to pre-application discussions with GLA officers as well as Hammersmith and Fulham Council officers, going back as far as 2020 for an earlier iteration of the scheme.
17. The current iteration of the proposal has been in pre-application discussions since early 2025, and GLA Officers have held two formal meetings with the applicants with written responses provided after each. The scheme evolved positively in response, particularly with respect to the scale and massing of the residential blocks and an improved proportion of dual-aspect homes. The most recent GLA advice, from 13 September 2025, is summarised as follows:
 - Residential-led redevelopment of the site is supported in land use terms.
 - 37% Social Rent housing by habitable room would be eligible for the Fast Track Route via the equivalency approach set out in the Mayor's Accelerating Housing Delivery Practice Note.
 - The broad urban design principles are supported.
 - The approach to strategic transport matters is broadly acceptable, subject to further discussion with TfL around potential mitigation for impacts on local public transport networks and the amount of school car parking.
18. Throughout pre-application discussions, Council Officers have raised concerns about the design and quantum of development, the loss of open space and sports facilities, the amount of affordable housing proposed, alternative funding streams for the improvement of the school, the impact on heritage assets and residential amenity, the quality of accommodation and the amount of car parking proposed.

Planning submission and GLA Stage 1

19. On 14 January 2026 the Mayor of London received documents from Hammersmith and Fulham Council notifying that a planning application of potential strategic importance had been received, and it was referred to him under Category 1A of the Town and Country Planning (Mayor of London) Order 2008 ("Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.")
20. On 23 February 2026, the Deputy Mayor for Planning, Regeneration and the Fire Service (hereafter, Deputy Mayor) considered the application and report prepared by GLA officers (GLA ref: GLA/2026/0023/S1). The report advised Hammersmith and Fulham Council that while the proposal was supported in principle, the application did not fully comply with the London Plan in certain respects, as below:

Land use principles: Residential development on the western part of the site would directly support the provision of high-quality consolidated school facilities on the remainder of the site, and the land uses are supported in principle.

Affordable housing: The development would provide 37% affordable housing by habitable room which could be capable of meeting the Fast Track threshold for public land on an equivalency basis, given the offer is entirely Social Rent. Further information was required to confirm this.

Urban Design: The proposals represent high quality design, and the site appears capable of accommodating the proposed tall buildings, subject to a detailed assessment of their visual, functional, environmental and cumulative effects.

Transport: Justification for the proposed car parking for the school use, which currently conflicts with London Plan Policy, is required. The trip generation assessment requires amendments, and clarification to ensure that a robust assessment can be made.

Energy and Sustainability: The proposals would provide policy-compliant reductions in CO2 emissions on site, and a carbon offset contribution should be secured for the remainder to Net Zero. The energy strategy would be capable of complying with the GLA Energy Hierarchy, subject to clarifications. The development is air quality neutral. Further information is required on WLC and CES.

21. No amendments were made to the application between Stage 1 and the Council's resolution.

Council's resolution

22. On 14 April 2026, the application was considered by Hammersmith and Fulham Planning and Development Control Committee. Members resolved to refuse planning permission in accordance with Officers' recommendation. The draft decision notice sets out the following reasons for refusal:

i) **Design:** The proposed development by reason of its design, scale and positioning, would result in an overbearing and dominant development which would harm the character and appearance of the local townscape, and as such would represent an overdevelopment of the site. The proposals would introduce tall buildings which would have a disruptive and harmful impact on the skyline of this part of the borough. Furthermore, it is not considered that the proposals will deliver a good quality of architecture which would support development of a tall building in this location and therefore would conflict with the NPPF (2024), London Plan (2021) Policies D4 and D9 and Local Plan (2018) Policies DC1, DC3 and DC4.

ii) **Heritage:** The proposed development, due to its scale, massing and visual prominence, would fail to preserve the character and appearance of the Old Oak and Wormholt Conservation Area. The taller built form would appear out of keeping with the established low rise estate character and would erode the area's openness, resulting in less than substantial harm at the low/mid-range of the scale of less than substantial harm. Heritage and public benefits would not outweigh this harm. Therefore, the development would be unacceptable having due regard to the provisions of Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF (2024), Policy HC1 of the London Plan (2021) and policy DC8 of the Local Plan (2018).

iii) **Quality of accommodation:** The proposed development, by reasons of its layout and form would fail to provide adequate quality of accommodation for future occupiers. Significant areas of the external shared amenity spaces would not receive suitable levels of light to provide functional or attractive recreational

spaces. A significant number of rooms proposed, particularly at ground and first floor levels would not receive adequate levels of light to provide high quality accommodation for future occupiers. Therefore, the development would fail to satisfy the requirements of London Plan (2021) Policy D6 and Local Plan (2018) Policies HO4, DC1 and DC2. page 3

iv) **Impact on neighbour amenity:** The proposed development by reasons of its height, bulk and massing would result in harmful reductions in the levels of daylight and sunlight of nearby residential properties, particularly to the north within the Calyx Building and Hayter House. The height and massing would also result in increased overshadowing and an overbearing and enclosing form of development from these neighbours' windows and garden areas. Therefore, the development would fail to satisfy the requirements of Local Plan (2018) Policies HO11, DC1 and DC2.

v) **Sports facilities:** The proposed development fails to demonstrate why existing sports facilities and open spaces are surplus to requirements, that replacement sports facilities are of superior quality, or that there are other clear benefits resulting from the proposal that outweigh their loss. The proposal therefore fails to satisfy the requirements of Local Plan (2018) Policies CF1 and OS2 and London Plan (2021) Policies S3 and S5, as well as paragraph 104 of the NPPF (2024) in respect of the unjustified loss of sporting facilities.

vi) **Affordable housing:** The proposed development does not adequately justify the provision of affordable housing, which would fail to meet adopted requirements in terms of the amount, tenure, mix and location of units proposed. The proposal is therefore contrary to Policies HO3 and HO5 of the Local Plan (2018) and Policies H5 and H6 of the London Plan (2021).

vii) **Biodiversity and play space:** The proposed development would result in the loss of onsite habitats of moderate value, which are not being replaced on site in accordance with the Biodiversity Net Gain trading rules. The development would also result in the loss of a Category B tree for which no mitigation has been proposed. Furthermore, inconsistencies between the submitted Tree Survey (and associated documentation) and the Landscaping Statement, UGF calculation and BNG Assessment are such that the accuracy of these calculations cannot be verified, resulting in potential failure to achieve the values set out in the application documentation, contrary to London Plan (2021) Policies G5, G6 and G7 and paragraphs 187 and 193 of the NPPF (2024). These values are also likely to be compromised due to the 'double counting' of land for the purposes of habitat provision and child play space, leading to further erosion of the delivery of both elements which are considered necessary to provide a development of an acceptable quality. In addition to these matters, the proposal fails to deliver a policy compliant level of onsite child play space for which no mitigation has been proposed, contrary to Policy S4 of the London Plan (2021) and Policy OS3 of the Local Plan (2018).

viii) **School parking:** The proposed development by reasons of the overprovision of car parking spaces for the school use, without robust justification is considered to be unacceptable and would result in vehicular movements as well as having an impact on highway conditions, to the detriment of sustainable transport modes.

The proposal is therefore contrary to Policies T1 and T4 of the Local Plan (2018) and Policy T6 of the London Plan (2021).

Applicant's request for Mayoral call-in

23. Under the provisions of Article 7(6) of the Town and Country Planning (Mayor of London) Order 2008, a direction must be given, pursuant to Article 7(6)(b) of the Order, where the applicant has requested the Mayor give a direction under section 2A of the 1990 Act.
24. On 22 May 2026, QUOD, acting on behalf of the applicants Future Academies and London Square, requested the Mayor to give a direction under section 2A of the 1990 Act.
25. On 1 June 2026 the Deputy Mayor for Planning, Regeneration and the Fire Service issued a direction that he is to act as the local planning authority for the purposes of determining this application.

Updates to the application

26. Following the Deputy Mayor's decision to call in the application, the applicant has engaged in a series of discussions with GLA officers regarding the outstanding planning issues, raised either in the GLA Stage 1 report or Council Officers' report to Committee. The applicant has provided various pieces of revised documentation to support the application and address the outstanding issues, including revised drawings that contain minor revisions to internal layouts to ensure Building Regulations compliance. These pieces of information are itemised below, but do not represent significant changes to the proposal and therefore further public consultation was not required, although they are available to view on the GLA website.

Changes to drawings:

- Additional single door added to Block C cycle store to comply with fire safety requirements.
- Block B lobby subdivided with resident wellbeing area adjacent to Block B lobby.
- Amenity door positions, precise locations and sizes updated to suit structural and fire safety requirements.

Revised supporting documentation:

- Planning Statement Rev A
- Revised supporting information to address GLA comments on Energy, Circular Economy, and Whole Life Cycle Carbon
- A response by QUOD to Sport England's consultation response
- An updated Transport response

- An updated Biodiversity Net Gain Assessment

Deputy Mayor's Site Visit

27. The Deputy Mayor undertook a Site Visit on 17 September 2026 accompanied by GLA and TfL officers, representatives of the Council, and the applicant team ahead of the Representation Hearing.

Referral to the Secretary of State

28. The power of the Secretary of State to call-in an application also exists where the Mayor has called-in an application.

Statutory consultee responses

29. The responses from statutory consultees and other organisations consulted by the Council are summarised as follows:
30. **NHS North-West London ICB:** A contribution of £386,294 is requested to support the delivery of additional primary care floorspace. Without this mitigation, the development would fail to comply with Local Plan Policies CF1 and INFRA1, London Plan Policies GG3 and S2, and relevant paragraphs of the National Planning Policy Framework.
31. **Sport England:** Objection due to net loss of sports facilities without adequate justification or replacement and the design of the new MUGA. The objection could be withdrawn if the MUGA is redesigned to Sport England and LTA standards, lighting reinstated, the sports hall design improved, and appropriate mitigation or justification provided for the loss of the existing northern MUGA and netball courts. [Note: Sport England are not a statutory consultee for this application].
32. **Transport for London:** No objection in principle but requires a series of mitigation measures. The site has a PTAL of 1b and therefore the scheme must maximise improvements to active travel routes.
33. **Historic England:** Not providing case specific advice on this application.
34. **Greater London Archaeological Advice Service (GLAAS):** No objection, site is not located within an Archaeological Priority Area.
35. **HSE Building Safety Regulator (Gateway One):** Has raised compliance issues over the development's fire strategy, see paragraphs 223-227 of this report.
36. **Thames Water:** No objection to the proposals subject to conditions and informatives attached to the permission.

Public and neighbour responses

37. As part of the public consultation process, the Council also sent notifications to local addresses and posted site and press notices. In response, the Council received a total of 127 responses (34 objections and 93 support comments),

summarised below. Copies of all responses submitted as part of the public consultation, and any other representations made on the case, have been made available to the GLA.

OBJECTION COMMENTS

38. Design, character and conservation area harm:

- The proposed 8-10 storey residential buildings are entirely out of character with the Old Oak and Wormholt Conservation Area.
- The scheme would fail the statutory duty under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act to preserve or enhance the area.
- Dominance over adjacent two storey properties.
- Disruption of historic rooflines and townscape rhythm.
- Harm to the “village like” character of the area.
- Creation of canyoning and wind effects from tall buildings.
- The proposal is contrary to Local Plan Policies DC1, DC2 and DC3 and London Plan Policies D1, D3, D9 and HC1.

39. Residential amenity – daylight, sunlight, privacy, outlook:

- Severe loss of daylight and sunlight, with some residents reporting up to 44.9% loss of VSC and reductions approaching 50% to key rooms and gardens.
- Increased sense of enclosure, overshadowing, and loss of outlook from two storey homes adjacent to the site.
- Widespread concerns of direct overlooking from balconies into private gardens and living spaces as well as school playgrounds. Several residents consider this to be an unacceptable safeguarding failure.
- Concern that the development would result in permanent reductions in quality of life, linked to diminished sunlight, privacy, tranquillity and garden usability.
- Several residents in the Calyx Building stated that the proposed 8-storey block would directly block all south-facing light to their homes.

40. Traffic, highways and construction impacts:

- Unsafe construction routing along narrow streets serving multiple schools (Wormholt Primary, Phoenix Academy, and nearby SEND provision).
- Concerns that construction lorries would create “dangerous, impassable conditions” at school drop off and pick up times.
- Cumulative impact concerns that construction impacts will compound with HS2 and other major developments underway locally.
- Long-term concerns regarding increased delivery and servicing traffic.
- Congestion on Bloemfontein Road (already used as a diversion route).
- Overspill parking due to insufficient on-site provision.
- Poor public transport accessibility (PTAL 1b).

- Objectors concerned the area cannot absorb an additional 600-1,000 residents without severe transport impacts.

41. Infrastructure capacity and public services:

- GP surgeries are already oversubscribed with residents claiming that existing residents cannot obtain appointments.
- Local schools are reportedly near capacity, and some believe that Phoenix Academy's claimed growth predictions are unrealistic.
- Concerns that the Victorian sewer and drainage systems in White City are said to be at breaking point, with fears of increased surface-water flooding and overloaded sewer networks.
- Concern regarding cumulative impacts with another major scheme at Bridget Joyce Square will further stress local infrastructure.

42. Environmental and ecological impacts:

- Loss of green space and mature trees.
- Reduction in biodiversity (birds, foxes, squirrels)
- Increased pollution (noise, dust, air quality impacts) during long-term phased construction.
- Harm to the tranquillity and ecology of Wormholt Park.
- Conversion of green surfaces into non-permeable hardstanding, conflicting with LBHF's "green sponge" drainage principles.
- Increased flood risk caused by additional impermeable surfaces.

43. Loss of educational land and safeguarding:

- The loss of existing educational land to residential development, contrary to Local Plan Policy S3 and London Plan Policy S3.
- The design enabling direct visual surveillance from private balconies into children's play areas, described as a critical safeguarding breach.

44. Concern about process and consultation:

- Procedural concerns regarding the Environmental Statement and it being incomplete, invalid, or missing assessments of cumulative impacts, air quality, flooding and noise.
- Residents criticise the consultation process with difficulties submitting comments through the online portal.
- Concerns about transparency in land disposal, and justification for enabling development.
- Residents' associations describe the consultation process as having been a poor experience for local residents.

45. A petition was organised by Wormholt Residents Association and obtained 718 signatures. Key issues include:

- Harm to the conservation area

- Daylight loss, averaging 32.7% and up to 44.9%
 - PTAL 1b cannot support 307 units.
 - Safeguarding failures due to overlooking
 - Biodiversity Net Gain trading rule non-compliance
 - Net loss of educational land
 - Cite procedural failures including ES validity concerns.
 - Representations made directly to the Mayor of London
46. Ward Councillors of White City and Wormholt wards issued a joint objection letter, stating:
- Support for the modernisation of Phoenix Academy and the provision of affordable housing.
 - The proposal was not co-produced with residents and their representative organisations.
 - The development shows insufficient sensitivity to the Old Oak and Wormholt Conservation Area in which it sits.
 - The development fails to optimise the full site area, resulting in excessive massing concentrated along the western boundary near residents on Gravesend Road and The Curve.
 - The applicant should work collaboratively with the Wormholt Residents Association and other affected residents to develop a revised scheme that achieves our shared housing and educational goals while respecting our community and its heritage.

SUPPORT COMMENTS

47. Support for School redevelopment
- Academy buildings are outdated and inadequate.
 - Desire for modern, safe, accessible facilities.
 - Belief that improved learning environments will enhance student wellbeing and achievement.
 - Phoenix Academy's recent success (Ofsted Outstanding)
 - The need for inclusive spaces, sports facilities, and improved SEND provision.
 - Support letters from students emphasise pride in the school and the importance of facilities reflecting its academic success.
48. Support for housing delivery
- Severe housing need in the borough
 - The suitability of the site for additional homes given proximity to schools, parks and services.
 - Some respondents encourage the Council to “build more densely”
 - Some respondents expressed enthusiasm for both the school and residential elements as a combined community benefit.
49. Support from local families and staff

- The school transformation is long overdue.
- Short-term construction disruption is outweighed by long-term educational benefits.
- The redevelopment will allow Phoenix to maintain high standards and meet future demand.
- Support letters reflect broad community support from families with children attending Phoenix Academy.

Residents' notifications of Mayoral call-in

50. As noted above the Deputy Mayor took over the planning application for his own determination on 1 June 2026. Letters were subsequently sent to all the original residents consulted, advising of the call-in and outlining that the Deputy Mayor will now be responsible for determining this planning application instead of the Council. Although not a formal re-consultation, 30 residents and five local ward councillors chose to make further representations directly to the Deputy Mayor, summarised below.

Objections directly to the Deputy Mayor

- Objection/petition from the Wormholt Residents Association with 718 co-signed residents (also submitted to the LPA)
- Serious harm to residential amenity, including daylight and sunlight, privacy, and outlook
- Harm to the historic character of the Old Oak and Wormholt Conservation Area through introduction of an 8-storey building into an area of predominantly 2-storey houses.
- Unjustified demolition and waste of public funds, specifically, demolition of the existing caretaker's house built in 2011
- Long period of disruption if it does go ahead, requiring strict conditions around working hours, dust, noise control and construction traffic
- New development would be disruptive to birds and pollinators and noise pollution from construction/additional traffic poses a significant environmental impact.
- Assembly Member James Small-Edwards also wrote to the Deputy Mayor raising local residents' concerns regarding the scale and design of the proposal and a widespread feeling that local voices have not been meaningfully heard.

Relevant legislation, planning policy, and guidance

51. The Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004 are the principal statutory considerations for town planning in England. Collectively these Acts create a plan led system which requires local planning authorities to determine planning applications in accordance with an adopted statutory development plan unless there are material considerations

which indicate otherwise (section 38(6) of the 2004 Act as amended by the Localism Act).

52. Additionally, for sites in Conservation Areas, the Planning (Listed Buildings and Conservation Areas) Act 1990 is also relevant.
53. In this instance the statutory development plan comprises of the London Plan (2021) and the Hammersmith and Fulham Local Plan (2018). A number of strategic and local supplementary planning guidance and other documents are also material to the determination of the application.

National Planning Policy Framework (NPPF) 2026

54. The NPPF is a material consideration in planning decisions. The NPPF, as supported by the Planning Practice Guidance (PPG), sets out national planning policies and how these are expected to be applied. A key component of the NPPF is the presumption in favour of sustainable development, as set out in Policies S3 and S4. For decision-making this means that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects.
55. The NPPF's presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for assessing applications. Proposed development that accords with an up-to-date Local Plan should be approved and proposed development that conflicts should be refused unless other material considerations indicate otherwise.

London Plan 2021

56. The latest London Plan was published in March 2021. It sets out the overall strategic plan for London and a fully integrated economic, environmental, transport and social framework for the development of the Capital over the next 20-25 years. As Hammersmith and Fulham is one of the 32 London Boroughs, the London Plan forms part of the development plan for the borough. The London Plan is supported by London Plan Guidance (LPG) documents providing further guidance on the implementation of London Plan policy.

Hammersmith and Fulham Local Plan 2018

57. The Council adopted the current Local Plan on 28 February 2018. The policies in the Local Plan together with the London Plan make up the statutory development plan for the borough. The role of the development plan is to guide decision making on planning applications and inform investment in social and physical infrastructure.
58. The 'Planning Guidance' Supplementary Planning Document (SPD) 2018 is also a material consideration in determining planning applications. It provides supplementary detail to the policies and is organised around key principles.
59. With regard to this application, all planning policies in the NPPF 2026, London Plan 2021, Local Plan 2018 and Planning Guidance Supplementary Planning Guidance (SPD) which have been referenced where relevant in this report have been considered with regards to equalities impacts through the statutory adoption

processes, and in accordance with the Equality Act 2010 and the Council and the GLA's Public Sector Equality Duty (PSED). Therefore, the adopted planning framework which encompasses all planning policies which are relevant in officers' assessment of the application are considered to acknowledge protected equality groups, in accordance with the Equality Act 2010 and the PSED.

Emerging Planning Policy

60. The emerging development plan documents listed below are also material considerations. The weight to be given to emerging policies depends on their state of advancement and is a matter for the decision maker.
- a) Draft Hammersmith and Fulham Local Plan (Regulation 18 version). Public consultation was carried out between 29 October and 10 December 2025.
 - b) Draft London Plan (Regulation 18 version). The public consultation on the draft plan is ongoing and closes on 15 October 2026.
61. The Draft London Plan and Draft Local Plan sections of this report consider the main changes in the direction of emerging planning policy where they are relevant to the proposed scheme and outlines the implications for the assessment of the proposed development. In terms of material weight, very limited weight is given to the policies contained within the draft plans because they are at a very early state of preparation and may change significantly before adoption. The consultation report for the Reg. 18 version of the draft Local Plan has not yet been published, and the consultation for the Reg. 18 version of the draft London Plan is still ongoing.

Planning issues and assessment

62. Considering the characteristics of the site, the details of the proposed development, the relevant local, regional and national planning policies and the consultation responses and representations received, the key planning issues requiring consideration by the Deputy Mayor are set out below:
- The principle of residential development on the site
 - Redevelopment and consolidation of open space and sports facilities
 - Provision of new housing, including affordable housing
 - Transport (including access, parking, cycle parking, deliveries and servicing, demolition and construction, and environmental impacts)
 - Urban design (including design scrutiny, surrounding character, layout and public realm, height and massing, residential amenity, fire safety, designing out crime and inclusive design)
 - Impacts on neighbouring amenity (including daylight, sunlight and overshadowing, privacy, noise and vibration, and wind microclimate)
 - Impacts on heritage and the historic environment (including the significance of the existing buildings on site, and impacts of the loss of non-designated heritage assets)

- Carbon emissions, climate change, and environmental sustainability (including air quality, energy, waste and the circular economy, and flood risk and drainage)
- Green infrastructure and the natural environment (including trees, biodiversity and ecology, and urban greening)
- Whether and how the impact of development can be mitigated through planning conditions and obligations
- The overall Planning Balance in which any harms of the development or areas of non-compliance with policy are weighed against the public benefits of the scheme, considering all relevant material considerations.

Principle of Development

Policy context

63. The site is not allocated for residential development or subject to any specific land use policy designations within the development plan, although it is located close to (but not within) the White City Regeneration Area (a Local Plan designation) and White City Opportunity Area (a London Plan designation). It is noted that the Regulation 18 version of the emerging Local Plan proposes the extension of the Regeneration Area boundary to include the application site, amongst other land.
64. NPPF Policies S3 and S4 state that planning decisions should apply a presumption in favour of sustainable development, approving proposals within settlements without delay where the benefits of doing so would not be substantially outweighed by adverse effects. NPPF policies also support boosting the supply of new homes, making effective use of land and prioritising previously developed and brownfield land for growth.
65. London Plan Objectives GG2 and GG4 promote Good Growth and support increasing housing supply, particularly affordable housing, and encourages the efficient use of brownfield land in accessible locations to support this purpose. Policy H1 requires boroughs to optimise housing delivery and sets targets for each borough towards this purpose - the ten-year target for Hammersmith and Fulham is 16,090 homes, equivalent to 1,609 annually.
66. Local Plan Policy HO1 also supports delivery of high-quality new residential development to meet identified needs in sustainable locations.

Planning Assessment

67. The proposal is for new housing on brownfield land, the principle of which is strongly supported by planning policy at national, London-wide, and borough level to meet urgent needs for new homes.
68. As it stands, the site is substantially under-utilised and represents an opportunity for optimisation to meet London's growth objectives. The existing school campus was laid out in the mid-20th Century for up to 1,300 pupils, a historic number that bears no relation to current demand for secondary school places at Phoenix Academy. Entire floors of the school's main teaching block are closed to pupils,

and other facilities (for example, the kitchen) are significantly oversized and inefficient for current pupil numbers. The campus is also inefficiently laid out, with large underutilised outdoor spaces (including grass to the west of the site and derelict sports courts in the north-west corner). Overall, the site is clearly larger than required by the Academy, and utilising part of the site for housing represents an efficient new use of the land.

69. Regarding the site location, local residents have raised ‘in principle’ concerns that the site does not represent a sustainable location for new housing given it has a low PTAL score of 1b, which taken by itself suggests the site is relatively inaccessible by Public Transport. However, consideration of the site’s broader position within the urban fabric suggests that the PTAL score may understate the site’s practical accessibility, and according to the Government’s Connectivity Tool, the site has a score of 86/100. The site sits in a densely developed inner-London location between White City, Shepherd’s Bush, and East Acton in fare Zone 2. The low PTAL score most likely reflects the walking distance from parts of the large site to nearby stations, rather than a lack of transport choice overall. In practice, the site benefits from walkable access to three Underground stations on multiple lines as well as bus services on Bloemfontein Road and Uxbridge Road, making it substantially more accessible in real-world terms than the PTAL score alone might suggest. Further, the locality itself is well-served by useful shops and services within walking distance (for example on Bloemfontein Road, Uxbridge Road, Shepherd’s Bush, Westfield White City) to serve new residents’ daily needs.

Conclusion/Summary

70. The principle of the proposed development, which seeks to optimise a brownfield site for new housing delivery, is supported by planning policy at national, London-wide and borough level.
71. The details of the proposal are still required to accord with the up-to-date development plan in force for the area and the remainder of this report contains a detailed assessment of this.

Development on Open Space

Policy Context

72. NPPF Policy HC7 states that existing open space, sports and recreational buildings and land, including playing field land and formal play spaces, should not be built on unless: (a) an assessment has been undertaken which has clearly shown the open space to be surplus to requirements or (b) the loss would be replaced by equivalent or better provision in terms of quantity and quality in a location which offers comparable or improved accessibility for the community it serves or (c) the development is for public service infrastructure and the loss would be replaced by equivalent or better provision in terms of quantity and/or quality or (d) the development is for alternative sports and recreation provision, the benefits of which clearly outweigh the loss of the current use.
73. The London Plan also gives strong protection to open space. Policy G1 states that London’s network of green and open spaces should be protected and enhanced.

More specifically, Policy S5 states that existing sport and recreational land should be retained unless the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location (reflecting the NPPF).

74. The application site is not specifically identified in the Local Plan as being open space of borough-wide importance, but is still protected by Policy OS2 which states that development on open space that (either on its own or cumulatively) has local importance for its open character or as a sport, leisure or recreational facility or for its contribution to local biodiversity or visual amenity will be refused unless:
- it is needed to realise a qualitative gain for the local community in pursuance of other physical, social or economic objectives of the Local Plan; and
 - provision is made for replacement of open space of equal or greater value elsewhere.
75. GLA Officers accept that some parts of the open space on the site does have local importance for sport, leisure and recreation, and its contribution to local biodiversity. Therefore, Local Plan Policy OS2 applies.

Planning Assessment

76. Approximately 61% of the current site comprises land on which existing buildings and car parking are sited. The remaining c.39% comprises open areas including a grassed athletics field, three hardcourts, one astroturf pitch, and a grassed-over courtyard. GLA Officers consider that the entire site meets the NPPF Glossary definition of “previously developed land” (i.e., brownfield land) which includes *“land which is or was occupied by a permanent structure... including the curtilage of the developed land...”*. Specifically, the open areas described above can be classified as ‘curtilage’, as they have a clear spatial and functional relationship to the school buildings which has existed since the development of the school in the mid-twentieth century and persists to the current day.
77. Notwithstanding the fact the whole site is previously developed land as per the NPPF definition, the open sports, play and amenity areas on the site still have the character of open space and these two concepts are not inherently contradictory. Notably, the school’s outdoor facilities are categorised within the LBHF Open Space Audit under “amenity green space in educational grounds/ school open spaces/ playing field land”. Some of the existing open spaces are disused and no part of the site is generally accessible to the public, but these factors do not change the fact it is open space.
78. The proposed development would result in a net reduction of 2,395 square metres of open space on the application site, some of which is judged to be of local importance. Accordingly, this reduction must be considered against the NPPF criteria, the London Plan and Local Plan Policy OS2.
79. With regards to NPPF Policy HC7(b) and London Plan Policy S5, these policies require that where open space land is to be built upon, the loss will be replaced by

equivalent or better provision. Whether or not the provision is equivalent or better must be judged in terms of both quality and quantity. Case law (Brommell vs Reading BC [2018] EWHC 3529 (Admin)) establishes that while both quantity and quality must be considered, Planning judgement can allow in appropriate cases for one to be set off against the other.

80. Whilst there would be no equivalent provision in terms of quantity, GLA Officers consider that the loss of quantity is set off against the improvement in quality and value of the new open spaces on the site, which are tired and lack amenity. The existing MUGA, Artificial Grass Pitch and playground will be refurbished with new surfacing, line marking and lighting; and the whole scheme will be subject to enhanced hard and soft landscaping including significant new greenery and tree planting. These changes will ensure the new open spaces are a marked improvement in quality, usefulness and visual amenity compared to the existing open space that would be reduced.
81. It is also relevant to consider the fact that some of the open spaces to be lost are not in use and have not been for some time. Historical photographs show that the open grass to the west of the site was laid out originally as landscaping (rather than any sort of sports facility). This area, and the disused tennis courts in the north-west corner of the site, have not been used or accessible to pupils and staff for at least 8 years since the current Headteacher joined the school. The loss of these spaces and reprovision of a reduced quantity on site would not, therefore, have any real-world impact on school pupils or staff.
82. For these reasons, the proposals are in accordance with NPPF Policy HC7(b) and London Plan Policy S5.
83. With regards to Local Plan Policy OS2, the additional policy test is whether there the net loss of open space is necessary to realise qualitative gain in pursuance of physical, social or economic objectives of the Local Plan. The Local Plan's strategic objectives are set out on Page 30 of the Plan. The proposed development, including the net loss of open space, would realise gains directly pursuant to the following strategic objectives in accordance with Policy OS2:
 - Achieving Sustainable Communities – 4) To ensure that both existing and future residents and visitors have access to a range of high-quality facilities and services, including education and leisure.
 - Delivering affordable homes for local people – 5) To increase the supply and choice of high-quality housing [...] particularly the need for affordable housing for residents to rent or buy and for homes for families.
 - Providing the best start for younger people – 19) To ensure that childcare facilities and schools in the borough meet the needs and aspirations of local parents and their children.

Conclusion/Summary

84. As outlined above, there is a robust justification for the net reduction of open space on the site, in accordance with NPPF Policy HC7(b), Local Plan Policy OS2 and London Plan Policy S5. The proposed development would result in

improvements to the quality and value of open space on the site that would offset the reduction in quantity and would also realise several qualitative gains pursuant to the strategic objectives of the Local Plan.

New school facilities

Policy Context

85. London Plan Policy S3 regarding education focuses primarily on brand new education and childcare facilities as part of large-scale development but also states that development proposals should not result in a net loss of educational facilities unless there is no ongoing or future need.
86. Local Plan Policies CF1 and CF2 support the provision of schools and the improvement of existing school facilities to meet local needs.

Planning Assessment

Education Capacity

87. In a technical sense, the proposed development would result in a net reduction in the number of pupil numbers the school could theoretically accommodate. As noted above, the existing campus was designed for around 1,300 pupils, but present-day school rolls are currently around 540 pupils.
88. The new school would be capable of accommodating up to 900 students and 80 staff, which allows for significant growth on current numbers. Hammersmith and Fulham Council's Education Officers were consulted on the application and confirmed that the proposed provision of school places does not raise any concerns and would not have an impact on the current forecasting or strategic planning assumptions on school provision. They confirmed there were no concerns with the capacity provided.

Design and size of new school facilities

89. The existing Phoenix Academy teaching blocks to be demolished date from the 1950s-80s, and the supporting information from Future Academies states that they are outdated, inadequate for providing an optimal learning environment and do not comply with current building standards. A site visit reveals this to be the case.
90. The new and refurbished accommodation would provide an additional science laboratory, assembly and drama halls, activity studio, an improved dining hall, and improved classrooms and staff spaces. A central library would be provided and would include group work rooms and flexible SEN spaces. The internal arrangement would provide improved circulation and connectivity between the school uses, which is a significant constraint of the current layout. With regards to internal floorspace, the retained and new facilities combined would result in 8,091 square metres of indoor educational floorspace. This exceeds the non-statutory BB103 Area Guidelines for Mainstream Schools which establishes recommended space standards for school buildings.

91. With regards to outdoor space and sports/PE provision, BB103 Part B recommended minimums are also met for informal play and social space, hard outdoor PE, soft informal and social areas. The BB103 metrics not complied with are for soft outdoor PE and habitat. Approximately 1,400 square metres of soft outdoor PE compared to the recommended minimum of 37,000sqm in BB103. This represents a very significant under-provision relative to BB103, but a slight increase compared to the existing site which has 1,359 square metres of soft outdoor PE.

	BB103 Recommended		Proposed (M2)
	Min (m2)	Max (m2)	
Hard informal & social area	1,100	2,400	1,439
Hard outdoor PE	1,750	3,050	2,101
Soft informal & social area	2,400	3,700	3,056
Soft outdoor PE	37,500	40,800	1,408
Habitat	450	1,750	187

Table 1: Proposed development and BB103 recommendations

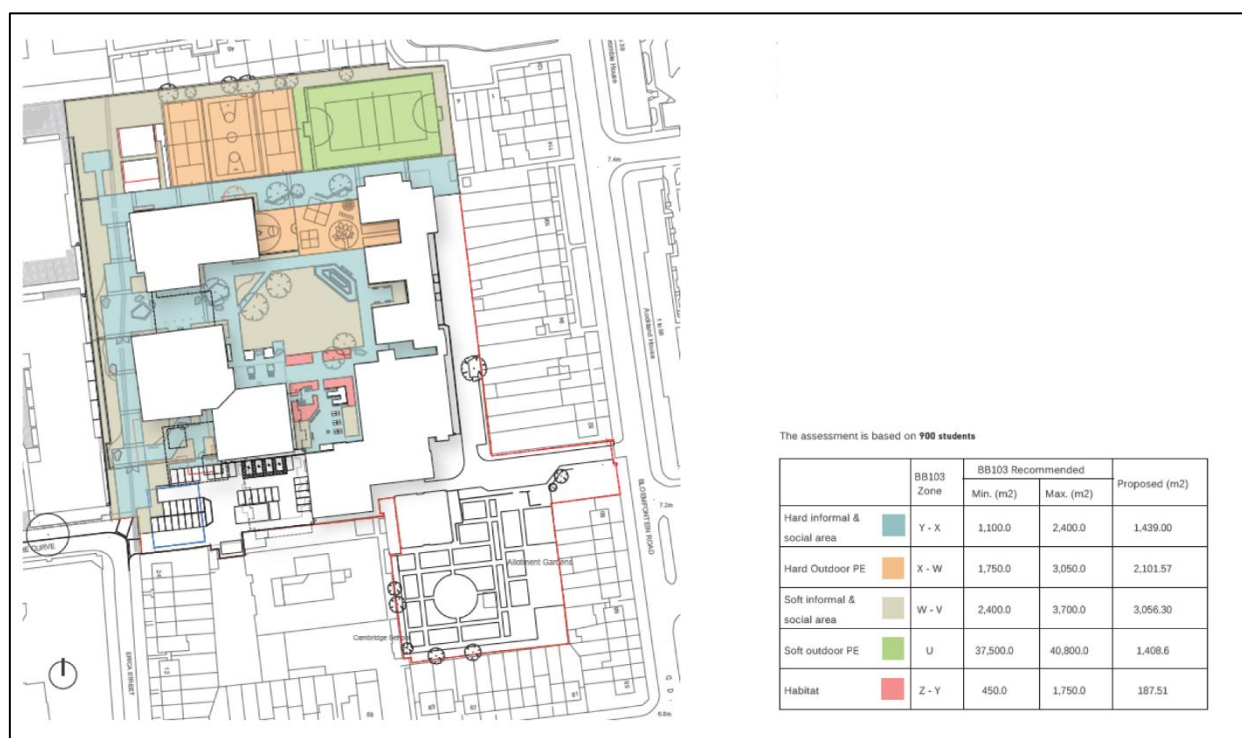


Figure 2: Plan of proposed development and BB103 recommendations

92. BB103 is an optional guidance standard (rather than a planning requirement) intended to be applied flexibly and recognises that refurbishment projects often have site constraints. The emphasis is placed on ensuring sufficient space for teaching, accessibility, inclusion, staff needs and community use rather than rigid compliance with every standard. Meeting the soft outdoor PE standard in this case would require the whole consolidated school site and more and is clearly not a realistic target for an existing school site in a densely built-up Inner London borough. The proposed hard and soft outdoor PE provision has been designed by the school to meet their own needs with an emphasis on quality and flexibility, and for this reason Officers do not raise any objections regarding quantum.
93. Table 1 above also identifies a significant under-provision of Habitat compared to the BB103 guidance. Under BB103 'Habitat' means outdoor site space set aside for wildlife, environmental learning, and supervised outdoor activities. In this case Officers accept that there is limited space on this densely built-up site for non-sport outdoor activities, with sport and recreation having been prioritised. Again, it is noted that BB103 is guidance only, and the under-provision against BB103 standards does not result a conflict with the development plan.
94. Sport England were consulted by the Council and provided comments on the design of the proposed sports facilities although they are not a statutory consultee in this instance (because no part of the site meets the statutory definition of playing field land). Nevertheless, they object to the proposal as follows:
- Quantitative grounds: Net reduction in sports provision without justification or mitigation that would offset the loss.
 - Qualitative grounds: Proposed replacement facilities are likely to give rise to safety risks due to their design, which does not include sports lighting or safety run/off areas between courts/pitches on the MUGA. The use of extensive glazing in the new Sports Hall is likely to be inappropriate for certain sporting activities (e.g. through damage from stray balls/objects).
95. Regarding the quantitative grounds, Officers do not hold any concerns regarding the quantum of sports provision. It has been designed by the applicant team to be suited to the needs of the Academy. Some of the existing sports facilities on site, notably the tennis courts in the north-west corner of the site, have not been used for many years and are in a poor state of repair. Tennis provision is being reinstated within the refurbished courts. Justification for the net loss of open space on the site is provided in the 'Development on Open Space' section of this report.
96. Regarding the qualitative grounds, Officers' judgement is that the new social space and PE provision represents a clear qualitative improvement compared to the existing site and that Sport England's objection raises technical matters that are capable of resolution through the recommended planning conditions requiring submission of detailed technical drawings of the new sports facilities and associated lighting.

97. For reference a comparison table of existing and proposed spaces is provided below.

<i>Existing sports provision</i>	<i>Proposed sports provision</i>
Existing Artificial Grass Pitch	To be retained and with Netball markings relocated here
Existing MUGA	To be retained and upgraded to include new Basketball markings and reintroduced tennis markings
Existing Sports Halls	Brand-new three-court Sports Hall with changing, storage and ancillary facilities with an internal floor area of 506.15m ²
Redundant/derelict tennis courts in NW corner of site (not used for 8+ years)	Tennis provision incorporated into refurbished MUGA
Redundant/inaccessible grass field adjacent to Western boundary	Not suitable for sports uses and has not been accessible to pupils for 8+ years – no need to replace

Table 2: Description of existing, retained and new sports and social spaces

Community Use of New School Facilities

98. The proposed sports hall has also been designed to facilitate community use, and a condition is attached requiring a Community Use Agreement to be submitted, securing the scope, management and operation of community access to the new school facilities.

Conclusion/Summary

99. The redevelopment of Phoenix Academy would not result in the net loss of any current-day or forecast educational capacity. The proposal would result in the replacement of aging facilities that are no longer fit for purpose with a high-quality, modern environment. The new school meets BB103 guidance for internal and external areas in almost all categories apart from soft outdoor PE and habitat but considering the specific circumstances of this site no objections are raised in this instance. The proposed development accords with Local Plan Policies CF1 and CF2.

Affordable housing

Policy Context

100. The NPPF Policy HO8 states that Major developments should meet or exceed up-to-date development plan requirements for the proportion and mix of affordable

housing tenures relevant to the location, including the minimum proportion of Social Rent.

101. London Plan Policies H1 and H6 states that developments should maximise affordable housing delivery, having regard to site capacity, viability (including the Threshold Approach), public subsidy, and the need for mixed and balanced communities.
102. The Local Plan target (Policy HO3) is for 50% of all new housing, borough-wide, to be affordable which is applicable to developments of 11 homes or more. Regarding tenure, Policy HO3 identifies a split of 60% of additional affordable housing to be for social/affordable rent, and 40% for a range of intermediate products. In negotiating for affordable housing, the Local Plan seeks the maximum reasonable amount taking into account size and site constraints; financial viability; the individual circumstances of the site; and site-specific infrastructure.

Planning Assessment

103. The residential element of the proposed development would provide 307 residential units in total, including 90 affordable units (100% of which would be Social Rent) which equates to 37% affordable housing by habitable room. By unit, provision would be 29%. The proposed housing figures for market and affordable homes by unit and by habitable room together with the proposed unit mix are set out in the table below.

All Homes	Homes (No)	Homes (%)	HR (No.)	HR (%)
Studio	0	0	0	0
1-Bed	100	33	200	22
2-Bed	132	43	396	43
3-Bed	55	18	220	24
4-Bed	20	6	100	11
Total	307	100%	916	100%

Table 3 – All homes

Market Sale	Homes (No)	Homes (%)	HR (No.)	HR (%)
Studio	0	0	0	0
1-Bed	90	41	180	31
2-Bed	108	50	324	56
3-Bed	19	9	76	13
4-Bed	0	0	0	0
Total	217	100%	580	100%
Affordable Housing	Homes (No)	Homes (%)	HR (No.)	HR (%)
Studio	0	0	0	0
1-Bed	10	11	20	6
2-Bed	24	27	72	21
3-Bed	36	40	144	43
4-Bed	20	22	100	30
Total	90	100%	336	100%

Table 4 – Market and affordable homes

London Plan Threshold Approach

104. At Stage 1 GLA Officers advised that the proposed 37% provision meets the London Plan's Fast Track threshold on an equivalency basis. As per London Plan Policy H5, the Fast Track threshold for Public Land (including school estates) is 50% but under the terms of the Mayor's Accelerating Housing Delivery Practice Note, an affordable housing offer that is entirely Social Rent may be considered equivalent to a 50% offer at a policy-compliant tenure split, due to the amounts of public subsidy required for different products. The equivalency route was created in view of the significant and increasing need for Social Rent housing London-wide, and this includes Hammersmith and Fulham.
105. GLA Viability Officers have confirmed, based on information submitted with the application, that the proposed 37% Social Rent offer is equivalent to a 50% offer at a Local Plan policy-compliant 60/40 tenure split and can therefore follow the Fast Track Route and is assumed to represent the maximum viable amount.
106. Whilst the proposed quantum is below the Local Plan's borough-wide aspiration for 50% affordable housing, the proposal nevertheless secures a significant quantum of affordable homes that is Fast Track compliant as described above. Local Plan Policy HO3 still allows for scheme-specific factors to be considered when determining the maximum reasonable amount of affordable housing, discussed below:
- (i) Site size and site constraints. This is a heavily constrained site, adjoined on three sides by residential properties. Consideration of existing residents' amenity has largely influenced the overall scale and massing of the residential building.

The size of the residential plot itself is a function of the indoor and outdoor space requirements for the new school on the eastern half of the site. These physical constraints influence how many new homes can realistically be provided on the site.

(ii) Financial viability. The applicant's initial appraisal suggests that 8% affordable housing is the maximum amount viable. GLA Officers have not conducted a review of the viability information submitted to the Council, because the application is being considered under the London Plan Fast Track Route. Nevertheless, Officers' experience of current market conditions and other major housing schemes in London currently progressing through the Planning system leads to a judgement that 37% is very likely to be a growth-based offer, exceeding current day viability.

107. Whilst the proposed provision is below the Local Plan's 50% target, Officers consider the offer represents the maximum reasonable amount in accordance with Local Plan Policy HO3, considering site constraints and present-day viability challenges affecting housebuilding across London.

Support for Housebuilding LPG (Time Limited Planning Route)

108. It is noted that the proposed 37% provision would also meet the new Time Limited Planning Route threshold for Public Land, which is 35%, as per the Mayor's Support for Housebuilding LPG adopted in March 2026. The LPG is a material consideration that supports the proposed development, although the applicant does not specifically seek to rely on this route in their application (which was submitted prior to publication and adoption of the LPG).

Affordable housing tenure

109. The proposed tenure of the affordable housing (i.e., entirely Social Rent) also "fails" to comply with the Council's tenure split within Policy HO3, which is for 60% Social/affordable rent and 40% intermediate products. Intermediate products are important and provide households on middle incomes with a route to home ownership, but target tenure splits are usually set with a view to securing a minimum proportion of Social or affordable rented homes, rather than a fixed quota requiring all schemes to provide both tenures in a precise proportion. This is reflected in NPPF Policy HO8, which states that "development proposals should meet or exceed up-to-date development plan requirements for the proportion and mix of affordable housing tenures relevant to the location, including the *minimum* proportion of Social Rent." [Emphasis added].
110. The need for Social Rent homes in Hammersmith and Fulham is extremely high. The Council's up to date Housing Needs Assessment (2025) confirms that there are now at least 17,204 households who require Social Rent homes, making up most of all affordable housing need. The large, unmet need for Social Rent homes in the borough is reflected in the direction of travel in the draft Local Plan which introduces a new tenure split of 70/30 in favour of Social Rent. The Affordable Housing LPG states that the Mayor's strong preference is for Social Rent, and the planning benefits associated with 90 new Social Rent homes is considered to outweigh the fact that no intermediate homes are provided.

111. Regarding the location of the Social Rent housing, they are in their own buildings for management purposes, which is standard practice and usually a requirement of Registered Providers (who require 'ownership' of lobbies, corridors and core spaces for management purposes). The key factor is whether the development is "tenure blind", i.e., there is no perceptible difference in the quality of the design or materials. Officers are satisfied this development provides a tenure blind development.

Social Rent Eligibility

112. The draft S106 agreement secures the provision of 90 Social Rent homes that meet all of the conditions contained in the NPPF glossary, namely: (a) the rent is set in accordance with the Government's rent policy for Social Rent; (b) the landlord is a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.

Review mechanism

113. The draft S106 agreement does not include an Early-Stage Review mechanism. This is acceptable on the basis that the 37% affordable housing provision has been assessed as being equivalent to a FTR compliant 50% affordable housing provision considering local tenure split requirements. This meets the 50% strategic affordable housing target within the London Plan which is what defines the affordable housing 'cap' within viability reviews. An Early Stage review is not required given that the scheme is already equivalent to the 50% strategic target at which the Early Stage Review would in any event be capped.

Affordable Housing – Conclusion/summary

114. The proposed affordable housing offer complies with Policies H1, H5 and H6 of the London Plan and is eligible to follow the Fast Track route. Whilst there is conflict with the numerical target in the Local Plan as well as the requirement for intermediate housing, having regard to the specific circumstances of this development, the offer is considered to represent the maximum reasonable amount of affordable housing this development can provide in accordance with Local Plan Policy HO3.

Unit Mix

Policy Context

115. London Plan Policy H10 concerns housing size mix and outlines the various criteria that decision-makers should have regard to when determining an appropriate mix, both overall and for low-cost rented housing.
116. Local Plan Policy HO5 gives a specific unit mix for social and affordable rent (10% 1-bedroom, 40% 2-bedroom, 35% 3-bedroom and 15% 4+ bedroom) subject to viability, location and site constraints considered on a site-by-site basis. For market housing, no specific unit mix is given, but the policy requires a mix of unit sizes including larger family accommodation.

Planning Assessment

117. Regarding the market housing component, no specific unit mix is set out in the development plan and the proposed mix is accepted as being a market-facing mix that provides for a range of unit sizes (see proposed unit mix in Tables 3 and 4 above).
118. Regarding the affordable housing component, compared to Local Plan Policy HO5, the scheme overall overprovides on 3- and 4-bedroom family homes whilst underproviding on 2-bedroom units, and therefore, does not propose a Local Plan policy compliant housing mix as set out in Table 5 below.

Size	Policy HO5 target	Proposed Scheme	Variance	Comment
1-bed	10%	11%	+1	Close to target
2-bed	40%	27%	-13	Underprovision
3-bed	35%	40%	+5	Overprovision
4+-bed	15%	22%	+7	Overprovision

Table 5 – Affordable Housing unit mix relative to Local Plan target

119. The London Housing Needs Assessment does identify a significant need for 1- and 2-bedroom Social Rented homes across London. However, the Council's Committee Report does not include any evidence to suggest there is currently an undersupply of smaller Social Rent homes, or a relative oversupply of family homes in the borough. In fact, the 2023-26 LBHF Corporate Plan explicitly identifies a need to develop a Family Housing Strategy to increase the number of family-sized homes in the borough across all tenures, with a particular focus on the number of households on the housing register needing 3-bedroom homes for genuinely affordable rent. The proposals seek to address an unmet need for affordable family housing, regardless of whether it technically overprovides larger units relative to Local Plan Policy.
120. Further, the Social Rent housing would be provided by Square Roots Housing Association, which was established by London Square as a for-profit Registered Provider and remains part of the London Square group and is their primary development partner. This close association between the developer and the Registered Provider gives significant comfort that the affordable housing mix has been tailored with close involvement from the RP in response to their residents' needs.
121. The Old Oak and Wormholt Estate within which the development is located, is already dominated by single family dwellinghouses as opposed to smaller flats. The site's location adjacent to Wormholt Park, which has a large children's play area, and within walking distance of primary and secondary schools, suggests it is well suited to provide a greater proportion of family housing compared to homes for single people or couples. As such a site specific consideration of the proposed mix suggests it is appropriate and responds to local need in accordance with Local Plan Policy HO5.

Conclusion/Summary

122. The proposed unit mix for the market sale housing includes a range of unit sizes and complies with London Plan Policy H10 and Local Plan Policy HO5. Whilst the unit mix for the affordable component does not strictly comply with Local Plan Policy HO5 proportions, there is a demonstrable unmet need for Social Rent homes for families in the borough. In that it has regard to identified needs, and the neighbourhood is well suited to families, the affordable unit mix proposal therefore complies with London Plan Policy H10 Part B and Local Plan Policy HO5 which states that unit mix will be considered on a site-by-site basis.

Quality of new housing

Policy Context

123. London Plan Policy D6 requires all new dwellings to have 'high quality design and adequately sized rooms' in line with the Nationally Described Space Standard. The Housing Design Standards LPG also covers the design quality of new homes. Policy S4 requires play space for children to be incorporated into new housing developments.
124. Policy HO11 of the Local Plan seeks to ensure that the design and quality of all new housing is of a high standard, and that new housing will meet the needs of future occupants and respect the principles of good neighbourliness (impact on neighbours is dealt with in the 'Neighbouring Amenity' section of this report). The Housing Standards SPD also includes key principles for high quality housing. Local Plan Policy OS3 states that new housing developments will require safe and secure communal play space on site, that is well designed and located.

Planning Assessment

Space standards

125. The proposed residential units would all be compliant with the Government's Nationally Described Space Standards in terms of GIA, with built-in storage requirements also being compliant. All bedrooms specifically would be compliant with the NDSS, with all double bedrooms being at least 11.5sqm and single bedrooms being at least 7.5sqm.
126. In terms of layout, the flats mostly have an open plan arrangement for the Living/Kitchen/Dining areas with the kitchen spaces positioned towards the centre of the building and the living spaces positioned closest to the windows. As noted above each bedroom would be compliant with space standards and the relevant bathrooms and ensembles would be of sufficient size. These layouts are considered acceptable in terms of circulation and functional spaces.

Dual aspect

127. In terms of aspect, most of the larger units would be dual aspect. Most of the 1-bedroom units would be single aspect with windows to only the living and bedrooms spaces (and not the bathrooms). This is common for smaller new build flats in London. Across the proposed development, the proportion of dual-aspect

units is 55% and there are no single aspect North-facing units, and none of the three- or four-bedroom family homes are single aspect. Officers accept that dual aspect homes appear to have been maximised across the site, and this is considered to be acceptable.

128. As background, to avoid the inflexible application of dual aspect standards in the Housing Design Standards LPG, the newer Support for Housebuilding LPG withdrew Standards C4.1 (which required new homes to be dual aspect unless exceptional circumstances applied). Flexibility on the proportion of dual aspect units can now be applied by decision makers, with particular attention paid to the practical implications of adequate ventilation, daylight and privacy, and avoiding overheating. The LBHF Housing Standards SPD similarly takes a flexible approach and seeks to maximise overall quality rather than a narrow focus on dual aspect.

Daylight

129. The proposed layouts have also been tested by the applicant for daylight illumination and sunlight penetration, in accordance with the BRE guidelines. 918 habitable rooms were assessed. When applying a 150 Lux target for the Living/Kitchen/Dining (LKD) spaces, the results demonstrate that within the proposed development, 686 of the 918 rooms assessed will achieve the guideline values for their relevant room uses as outlined within the BRE guidelines. Resultantly, 25% of the habitable rooms within the development would not meet the relevant standards. This can be broken down into 188 of the 306 LKDs (39%) and 498 of the 612 bedrooms (19%). The single aspect units at ground and first floor level would be most impacted. Overall, 75% of the habitable rooms within the development meet the BRE guidance.
130. Taken in the round, Officers do not consider that the proposed development would overall, provide an unacceptably poor standard of accommodation, even within those units that have daylighting levels that fall short of the BRE guidance. The lighting levels are still considered to be within reasonable limits for a dense, urban style development and as noted above, none of the single aspect units are exclusively north facing.

External amenity space

131. Each unit would have individual external amenity in the form of either balconies or gardens/courtyards at ground floor level. These range from 5 square metres to 14 square metres dependant on position. These sizes would comply with relevant space standards for external amenity (London Plan Policy D6) and would be usable, well-designed, well-lit and able to receive reasonable levels of light in accordance with Local Plan Policy HO4.
132. In addition, 4,724 square metres of communal external amenity is also provided within the residents' courtyards and to the north of the site with an additional 358 square metres of public realm around the buildings.
133. Council Officers raised concerns that the communal amenity areas would be substantially overshadowed and potentially feel claustrophobic given they would be surrounded by buildings up to 8 storeys. However, this type of arrangement is

far from unusual and largely unavoidable in high-density residential developments, especially if maximising the layout for direct sunlight to external areas is not possible due to access constraints or the need to avoid impact on neighbours. Whilst the spaces would be visually enclosed and significantly shaded, GLA Officers do not agree that this necessarily reduces their attractiveness or usability. The proposed landscaping plans indicate that they would be green spaces with attractive planting, a range of paths and seating areas, and children's play space. The passive surveillance of surrounding flats is also liable to increase the perception of safety for users. GLA Officers are satisfied that the communal amenity would be of good quality considering the development as a whole.

Noise and vibration

134. The applicant has submitted a Noise Impact Assessment by Hoare Lea which considers whether the new residents would be affected by any existing or future sources of noise and vibration. The predominant noise sources of the surrounding area relate to school related activities and more significantly, road traffic noise including the Westway dual carriageway to the north.
135. The Noise Impact Assessment concludes that the recommended internal and external ambient noise levels can be achieved through the proposed acoustic design assumptions and mitigation measures for walls, double-glazed windows and roofs. A condition requiring details of enhanced sound insulation between flats is also recommended to be attached.
136. It is noted that window-opening is also described as mitigation for overheating, but opening the windows could result in internal spaces exceeding recommended noise levels. A condition for a detailed ventilation strategy is attached, to ensure that best endeavours are used to overcome noise constraints through the ventilation strategy.
137. The existing representative background noise levels observed included 43dB at daytime and 37dB at nighttime for the residential properties along The Curve and 46dB at daytime and 40dB at nighttime for the residential properties along Sundew Avenue. The proposed plant for the development includes Air Source Heat Pumps on the roofs of Blocks F & G which would include 2.5m high acoustic screening and subject to these mitigation measures, the resulting noise from the new plant and machinery would be at least 10dB below the lowest pre-existing nighttime background noise. A condition is also recommended regarding anti-vibration mounts for all plant and machinery to be installed on the residential development.

Children's Play space

138. The GLA child play space calculator indicates that the residential development would generate a child play space requirement of 1,991 square metres (inclusive of 827sqm required for children aged 0 – 4, 657sqm for primary aged children and 57sqm for secondary aged children). Of this, 1,767 square metres of play space is to be provided on site, primarily for pre-school and primary school aged children. This represents a shortfall in respect of the required amount, particularly in respect of secondary school age children.

139. The draft S106 agreement secures a financial contribution towards off-site play enhancements, which is provided for in the London Plan, to address the shortfall. At this stage, no detail has been provided regarding the location of off-site play enhancements and age-appropriate safe routes to these. These details are secured by condition and to be agreed with the Council's parks team.
140. The on-site play space is located within the residents' communal external amenity spaces and includes formal equipment (for example, climbing frames, tunnels, stepping stumps, etc) as well as playable elements integrated into the landscape (for example, boulders). A condition is attached requiring full details of all play equipment/ installations to be submitted prior to installation.

Residential space cooling and overheating risk

141. In accordance with the GLA Cooling Hierarchy, mitigation has been designed into the scheme to minimise internal heat gains, such as energy efficient lighting with low heat output, insulation to heating and hot water pipework, and energy efficient appliances and equipment with low heat output.
142. Mitigation is also proposed to reduce the heat entering the building in summer, including consideration of glazing ratios on south and west-facing elevations, g-values of glazing to control solar heat gain, and external blinds and opaque panels.
143. A mixed-mode ventilation strategy is proposed via natural ventilation (openable windows) and mechanical ventilation (MVHR) which includes the ability to provide an element of cooling to ensure internal temperatures remain within acceptable limits where windows must be closed due to noise (i.e., at night) although no comfort cooling/ air conditioning is proposed.
144. The submitted overheating risk assessment for a sample of 10 dwellings within the proposed residential development indicates that the mitigation measures outlined above will reduce the risk of overheating in line with industry guidance in accordance with London Plan Policy SI4.

Conclusion/Summary

145. Overall, the proposed development is considered to provide an acceptable standard of amenity for future occupiers in terms of space, storage, internal and external amenity space, noise, vibration, overheating risk, and daylight. Breaches of relevant guidance, in the case of light levels, are not considered to affect the overall standard of accommodation significantly and would not represent a conflict with the development plan. The proposals are in accordance with the NPPF, London Plan Policies D6 and S4 and Local Plan Policies HO11 and OS3.

Urban design

Policy Context

146. NPPF Policy DP3 seeks to ensure that development proposals respond to their context so that they integrate with, and enhance, their surroundings such as through the arrangement of development plots and buildings, the use of materials

and architectural features, and the restoration, reuse and integration of heritage assets. This should not preclude innovation or change where appropriate, especially where an increased scale or density of development is justified in accordance with NPPF Policies L2 and L3.

147. Chapter 3 of the London Plan seeks to secure the delivery of good design through a variety of ways. Policies D3, D4, D6, D8 and D9 are particularly relevant to the consideration of this application. Policy D3 highlights that all developments must make the best use of land by following a design-led approach that optimises the capacity of sites, through careful consideration of issues such as form and layout, alongside consideration of quality and character. Policy D4 highlights that, where appropriate, visual, environmental and movement modelling / assessments should be undertaken to analyse potential design options for an area, site, or development proposal. These models, particularly 3D virtual reality and other interactive digital models alongside use of design review should, where possible, be used to inform decision-taking, and to engage Londoners in the planning process. Policy D6 promotes a series of quality standards that new housing development should aim to achieve. Policy D8 sets out a series of criteria to ensure that the public realm is well-designed, safe, accessible, inclusive, attractive, and well-connected. Policy D9 promotes a plan-led approach to tall buildings and a framework to assess the impacts of such developments.
148. Local Plan Policies DC1, DC2 and DC3 are also particularly relevant to the assessment of design. Policy DC1 states that all development within the borough should create a high-quality urban environment that respects and enhances its townscape context and heritage assets. There should be an approach to accessible and inclusive urban design that considers how good design, quality public realm, landscaping and land use can be integrated to help regenerate places. Policy DC2 sets out to ensure that new build development will be of a high standard of design and compatible with the scale and character of existing development and its setting. Policy DC3 identifies the areas within which tall buildings may be appropriate; the policy also sets a framework to assess proposals for tall buildings in those areas.

Planning Assessment

Design scrutiny

149. The current proposals have not been presented to the Hammersmith and Fulham Design Review Panel (DRP), although earlier iterations of the proposals were presented to the DRP in late 2019.
150. Pre-application discussions have involved specialist design and heritage officers from both the Council and the GLA, resulting in positive changes to the scheme as it has progressed through design evolution. As such, Officers are satisfied that the proposals have been subject to a suitably thorough process of design scrutiny including by the local borough, which is a requirement of London Plan Policy D4.

School design

151. The school site would be redeveloped following the demolition of the main school buildings occupying the central and western portion of the site, including the main

school building, sports hall block and the caretaker's house. Other buildings remaining on-site would be subject of some remodelling as part of the redevelopment of the school campus, this includes the Vibe and leisure centre buildings.

152. The proposals would bring forward development comprising of two key elements, a new school building to the central portion of the site and residential development to the western extent of the site, at the interface with existing residential developments. The new school building would follow an urban school typology with key functions arranged vertically to consolidate the scale and massing to the central portion of the site.
153. The replacement school building has a well-ordered and functional architecture with facades broken up through use of secondary cladding elements and glazing. At roof level, the external roof terrace is treated through use of timber pergola structures. The southern elevation would be the main feature of the development visible in public views, and this façade has been carefully considered to complement the retained 'Vibe' building on site which has a more expressive architectural form. The design of the replacement school building, and its integration with the retained buildings, are considered to represent a good quality of design and are acceptable.

Development layout and public realm

154. The residential element comprises two key blocks: a u-shaped block to the north of the site and a perimeter block to the south fronting onto The Curve. New residents would benefit from shared amenity within the courtyards. The new vehicle/pedestrian route into the site from The Curve would be tree-lined with green verges, and the front elevation of the building on The Curve would be set back to introduce new areas of hard and soft landscaping and increased footway width in some areas. Overall, the development layout is well-optimised and benefits from high quality hard and soft landscaping, details of which are to be secured by condition.
155. At GLA Stage 1 and 2, Officers considered that there was still opportunity to reconsider access to the 'promenade garden' between the school and the residential block, which is currently within the school's perimeter boundary fence and not accessible to the wider community. Officers believe that there may still be opportunities to unlock this space for wider benefit outside of school hours without compromising the security, safeguarding or management of the school. However, the applicant has chosen not to pursue any changes to the promenade garden, and it remains wholly within the school's perimeter fence. Although this may be a lost opportunity, both elements of the development are still acceptable overall and there is no development plan policy conflict on design grounds.

Scale and massing

156. The scale of the residential blocks seeks to maximise the amount of floorspace within the constraints of the site. The flat blocks are predominantly 6 storeys with 3 and 4 storey elements closest to the western boundary (with the rear gardens of neighbouring properties) rising to 8 storeys to the east closest to the boundary with the school. A general massing diagram with storey heights indicated is shown below.



157. Officers consider that the building heights are acceptable for the reasons discussed in the Tall Buildings Policy assessment below. The massing, roof profile and elevational appearance of the buildings has evolved positively through pre-application discussions and are supported.
158. The proposals do contrast in scale and mass with the existing low-rise context, and the new buildings will be highly visible in some views from surrounding streets and Wormholt Park, within the Conservation Area. Further analysis is set out in the Tall Buildings, Townscape Views and Heritage sections of this report.

Detailing and materiality

159. The proposed residential blocks feature brick as their primary facing materials, with contrasting brick tones and varied parapet/roofscape treatments intended to break up the mass and volume of the building. The buildings have some articulation particularly at ground floor levels, through use of vaulted entrances along the key frontages to The Curve and to individual blocks.

160. The other details of upper floors of the building are considered acceptable. The architects have also used contrasting brickwork colour, parapets and set-back building lines to break up the form and steer mass of the buildings in surrounding views. Conditions are recommended for details and samples of materials, and detailed drawings of typical window and door bays as well as boundary treatments.
161. It is noted that roof top plant and machinery, for example, Air Source Heat Pumps, are proposed for the development. Conditions are recommended requiring details and drawings of the proposed equipment and any screening or enclosure, to ensure a satisfactory appearance.

Accessibility and inclusion

162. London Plan Policy D5 seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). The applicant has submitted a design and access statement which ensures that the development can be entered and used safely, easily and with dignity by all; is convenient and welcoming with no disabling barriers; and provides independent access without additional undue effort, separation, or special treatment. It therefore meets the requirements of Policy D5.
163. All the proposed residential units would meet Building Regulations standard M4(2) 'Accessible and Adaptable Dwellings, meeting the requirements of various users including older people, those with reduced mobility, and some wheelchair users. 10% of the units would meet M4(3) standard 'Wheelchair User Dwellings', which would be constructed to be fully accessible and adaptable to all wheelchair users. Details of the M4(3) unit layouts are secured by condition.
164. For the school, a condition has been recommended requiring an Inclusive Access Management Plan to be approved for the school, to ensure that all pupils, staff and visitors can access the school environment and its facilities safely and equitably.
165. In terms of access and inclusion, therefore, the proposed development accords with London Plan Policies S4, D6 and D7 and Local Plan Policies HO6 and HO11.

Secured by Design

166. Policy D11 of the London Plan relates to safety, security and resilience to emergency. This policy requires new development to provide legible, convenient and well-maintained movement routes and spaces which are well-overlooked and benefit from an appropriate level of activity, with private and communal spaces clearly defined to promote a sense of ownership. Local Plan Policy DC1 seeks to ensure that new developments, new publicly accessible open spaces and new community and leisure facilities are inclusive and accessible, contribute to improving quality of life and reducing the incidence of crime and anti-social behaviour. Policy DC2 requires developments to be designed in line with the principles of Secured by Design.

167. The proposals were reviewed by Hammersmith and Fulham Council's Secured by Design officer, who requested further engagement with the applicant team regarding Secure by Design measures relating to the proposed cycle access and entrances to Blocks B, C and D. To address these comments and the relevant development plan policies, details of how 'Secure by Design' Accreditation (either silver or gold) is to be achieved is recommended to be secured by planning condition for both the school and residential developments.

Conclusion/Summary

168. For the reasons summarised above, in urban design terms the proposal is considered to accord with London Plan Policies D3, D4, D6 and D8 and Local Plan Policies DC1 and DC2.

Tall Buildings Policy Assessment

169. London Plan Policy D9 regarding tall buildings is split into three elements. Part A provides a London-wide definition of a tall building (6 storeys or 18 metres from ground) and Part B highlights the need for boroughs to take a plan-led approach to the development of tall buildings.
170. The Local Plan does not set a numerical definition for a tall building but instead Policy DC3 defines a tall building as one which is significantly higher than the general prevailing height of the surrounding townscape and/or would have a disruptive and harmful impact on the skyline. Given the proposed building heights are as a matter of fact higher than the prevailing height of the immediately adjoining buildings, a cautious approach dictates that they are to be defined as "tall buildings" for planning policy purposes. That said it is not judged that the development would have a disruptive or harmful impact on the skyline, as set out in the assessment below.
171. The site is not located within an area specifically identified in the Local Plan as being suitable for tall buildings and a full impact assessment against Part C of London Plan Policy D9 is required. This is considered in the sections that follow:

Visual impacts

a) The views of buildings from different distances

172. Computer-generated views of the proposed development from various surrounding locations have been provided within the Heritage Townscape Visual Impact Assessment (HTVIA) submitted in support of the planning application. These show the proposed scheme would have limited impact upon long-range views and no impact on strategic LVMF views, although there would be more significant impacts on mid-range and immediate views, due to the change in scale between the existing townscape of the Old Oak and Wormholt Estate and the proposed flatted blocks. A full assessment of the impact on townscape is in the 'Townscape Views' section of this report.

b) Whether part of a group or standalone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding.

173. The stepped form of the blocks rising from 3 storeys adjacent to the western boundary to 8 storeys adjacent to the school buildings provides a transition in scale from the immediately adjoining buildings. Whilst not directly adjacent to the site, there is already a clear mid-rise element within the neighbourhood that is a particularly strong characteristic of the area to the east (for example the 5-storey White City Estate and the 7-storey Bloom building on Bloemfontein Road). There are also lower, 4-storey flat blocks immediately to the north of the site. Officers consider that the development would not be out of keeping with the wider spatial hierarchy, albeit there would be a more noticeable transition from the two-storey homes of the Old Oak Estate.

c) *Architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.*

174. The materiality of the scheme and the architectural approach and detailing are all supported and are of high quality.

d) *Proposals should take account of and avoid harm to the significance of heritage assets and their settings.*

175. Heritage impacts are addressed in the 'Heritage' section of this report. In summary, less than substantial harm to the Conservation Area has been identified, at the lower to middle of the scale. This harm is weighed against the public benefits of the scheme in the 'Planning Balance' section of this report.

e) *Buildings in the setting of a World Heritage Site must preserve and not harm the Outstanding Universal Value of the World Heritage Site and the ability to appreciate it.*

176. Not relevant - the site is not within the setting of a World Heritage Site.

f) *Buildings near the River Thames should protect and enhance the river and riverside public realm.*

177. Not relevant – the site is not near the River Thames.

g) *Buildings should not cause adverse reflected glare.*

178. The facing materials for residential buildings would be primarily brick and would not be likely to result in adverse glare.

h) *Buildings should be designed to minimise light pollution from internal and external lighting.*

179. The application sets out measures to minimise light pollution from the proposed development. Conditions requiring further details and a 'lights off' strategy for the school are recommended to be secured by condition to ensure that the proposal would respect the interests of both amenity and biodiversity in this regard.

Functional impacts

- a) The internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants.*

180. The application is supported by a Fire Statement that shows how the buildings have been designed with the safety of occupants in mind, which is discussed further in the Fire Safety section of this report.

- b) Buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process.*

- c) Entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas.*

181. Servicing arrangements are covered in the 'Transport' section of this report. Conditions are also applied to require submission and implementation of an inclusive accessibility strategy, and deliveries and servicing management will secure the suitability and safety of access and servicing arrangements.

- d) It must be demonstrated that the capacity of the area and its transport network can accommodate the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building*

182. Impacts on public transport capacity and infrastructure is covered in the 'Transport' section of this report, which also discusses required improvements to local walking and cycling infrastructure.

- e) Jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area and maximises the role of the development as a catalyst for further change in the area.*

183. The main public benefits of this development include new, enhanced school facilities (some of which will be available for public/community uses) and new homes, including affordable homes, for the community. The development has been designed to maximise these benefits and are appropriately secured either by planning obligation or condition.

- f) Buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings.*

184. The construction of an 8-storey building in this location is not considered likely to interfere with any of the above.

Environmental impacts

- a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building*
- b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions*
- c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building*

185. These matters are addressed in the documentation that has been submitted in support of the planning application and are considered elsewhere in the relevant sections this report.

Cumulative impacts

- a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retrofitting.*
186. Regarding cumulative impacts, given the site's location, height and the nature of the surrounding built context, it is not anticipated that there will be any adverse cumulative effects arising from the proposal, in terms of either visual, functional or environmental effects.

Public access

187. Policy D9 criterion D regarding public access relates to publicly accessible viewing platforms and is most relevant to very tall buildings in Central London. This criterion is not relevant here.

Conclusion/ summary – Tall Buildings assessment

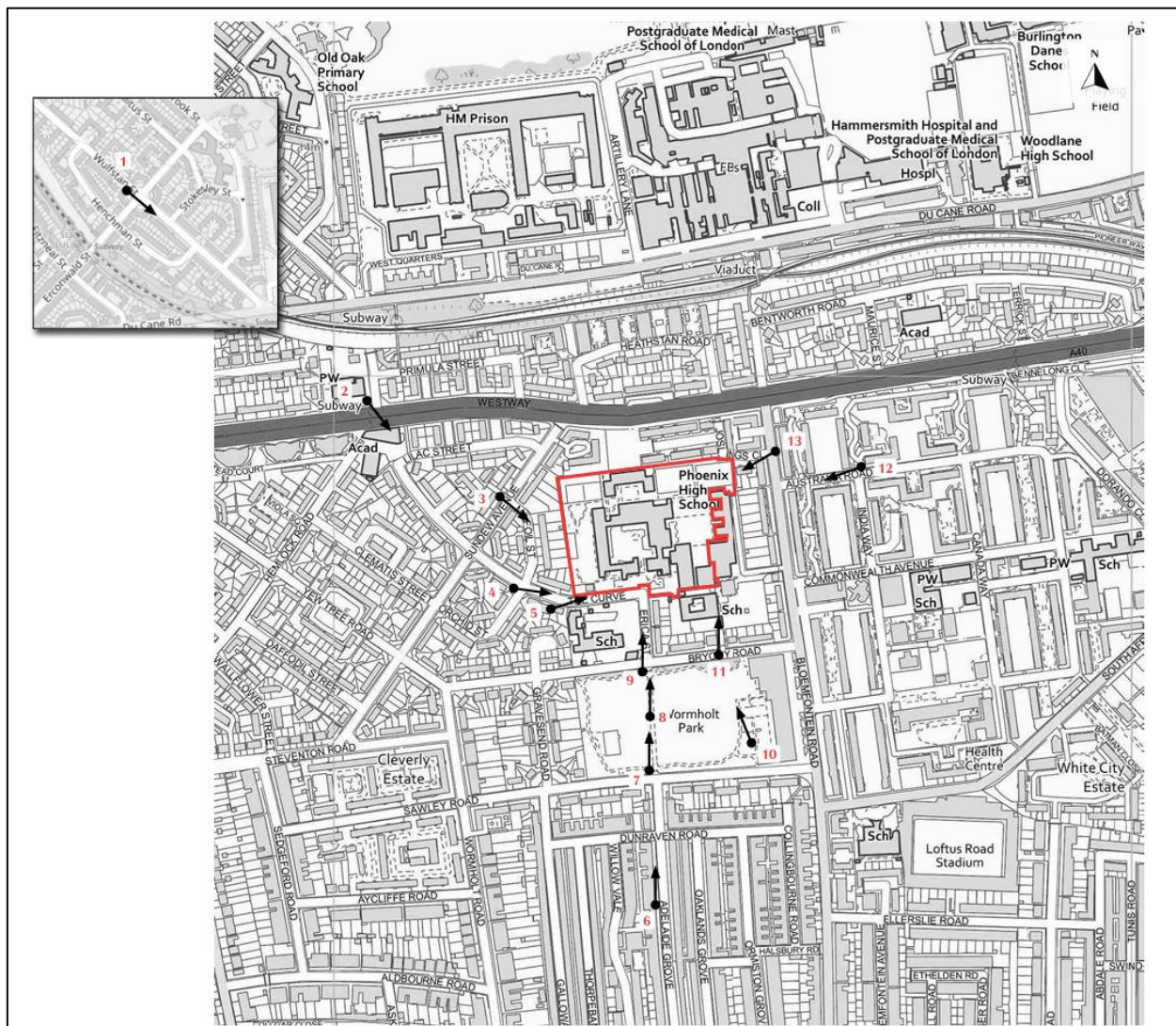
188. The site is not within an area identified as being suitable for tall buildings within the Local Plan, and therefore does not comply with the locational criteria within London Plan Policy D9 Part B. This does not mean the development is automatically unacceptable. GLA Officers have undertaken an assessment of the proposal against the visual, functional, environmental and cumulative criteria of London Plan Policy D9 Part C, including an assessment of the proposed townscape views. As discussed above, Officers have concluded that the impacts of the proposed tall building are acceptable in accordance with Part C.

Townscape Views

189. As noted above, the development would not have any significant impacts on longer-range views or any strategic LVMF views, owing to its height at 8 storeys and the presence of intervening townscape. However, the submitted Heritage,

Townscape and Visual Impacts Assessment (HTVIA) identifies 13 shorter-range viewpoints as a representative picture of the impact of the proposed development on the local townscape. (Officers have referred to the same 13 views are used to assess the impact on heritage impacts, discussed separately in the 'Heritage' section of this report.)

190. The HTVIA view locations are shown below. A summary of the development's visibility within each of the views is provided below in this report with further analysis of the townscape impact (i.e., in terms of magnitude, significance and direction of change, as set out in the best practice Guidance for Landscape and Visual Impact Assessment by the Landscape Institute, 2013.)



Map: Viewpoints assessed in HTVIA

191. The townscape of the Old Oak and Wormholt estates, by virtue of their conservation area designation, have a moderate sensitivity to change, due to their strong sense of place and townscape identity. The townscape situated to the north and east of the application site have a lower sensitivity to change, being more

mixed and higher rise in character and outside of the conservation area designation.

192. View 1: Junction of Wulfstan Street and Erconwald Street. Development is only minimally visible in this view and would be almost completely obscured by intervening dwellings and a street tree. The magnitude of change is very low, and the significance of the effect is minor/none.
193. View 2: Westway, outside St Katherine's Church. The upper floors of the development would come into view above the rooflines of the two storey houses on the Westway. The overall impact on this view mitigated by a light, recessive brick colour palette and materiality. The magnitude of change is low, and the significance is minor. Existing and consented schemes at White City would also be visible above the rooflines of these houses. The cumulative magnitude of the development in conjunction with the White City towers is slightly greater but still low and of minor low significance.
194. View 3: Junction of Sundew Avenue and Milfoil Street. This view would bear one of the greatest changes in terms of magnitude. The uppermost 2/3 storeys of the new residential block would be visible above the rooflines of existing 2 storey homes at reasonably close range, resulting in a medium-high magnitude of change. The massing and form of the development in this view is fairly and uncomplicated and benefits from a lighter, more recessive colour palette. Nevertheless, there would be a moderate change to this view.
195. View 4: Junction of The Curve and Orchid Street. This view is very close to the proposed development and would also have a medium-high magnitude of change, with the proposed development appearing over the roofline and the chimney line of the two storey homes and enclosing the sky gap between two houses on The Curve and Milfoil Street. The impact would be greatest in winter; in summer, part of the development would be blocked by a mature tree. The form of the development in this view would also be more complicated than in View 3. The significance of the change is moderate.
196. View 5: The Curve, outside No.44: The magnitude of change from the existing situation would be high, given this viewpoint is almost immediately in front of the application site. In this view, the tallest elements are set back, and the beneficial effects of the stepped massing are most evident. The high-quality design coupled with the new greening to the street on The Curve represents an improvement on the existing hard/impermeable boundary and views of the ageing school buildings. Officers judge that the significance of the change is substantial.
197. View 6: Adelaide Grove, outside No.83: The development is largely obscured in this view by tree cover and buildings along Adelaide Grove. The magnitude of change is very small and of minor significance.
198. View 7: Wormholt Park, Southern entrance gate and View 8: Wormholt Park Centre of Path: The proposed residential element of the scheme would appear just to the left (west) of the central path running through Wormholt Park. Most of the bulk of the development in this view would be obscured by existing tree cover, even in winter. The development is at a remove from the park and would form part of the varied urban backdrop to the open space, rather than have a significant

overbearing or enclosing effect on the park itself. The south elevation of the development is varied in colour and detailing and is of high-quality design. The magnitude of difference is judged to be small-medium, and of minor significance.

199. View 9: Wormholt Park, Northern entrance gate: Moving northwards, the new development becomes the primary built form in this view resulting in a medium-high magnitude of change. The new development's 8-storey mid-rise height contrasts to the two-storey homes running N-S along The Curve, but the high-quality design could represent an improvement on the existing views of the ageing school buildings. Nevertheless, the significance of the change is moderate.
200. View 10: Wormholt Park, by playground. The development would be visible between trees and above the rooflines of two-storey homes on Bryony Road. The magnitude of change is judged to be small-medium, given the view is quite distant and the development would not be above the treeline. The significance of the change is moderate. Officers note, in the wider view from this viewpoint, tall buildings within LB Ealing are visible beyond the western section of the park; and the 7-storey Cranston Court is behind the viewer. Officers' view is that the development would not be perceived as an outlier in this respect.
201. View 11: Bryony Road, entrance to Cambridge School: Development would not be visible. No change.
202. View 12: Australia Road, junction with Lawrence Close. The development would be slightly visible at the western end of the road, above the rooflines of two-storey homes on Bloemfontein Road. This part of the White City estate is already characterised by five storey buildings with pitched roofs, which dominate the immediate townscape. It is unlikely that the proposed development would draw the eye in this context. Both the magnitude and the significance of the change are judged to be low/minor.
203. View 13: Bloemfontein Road, Bus Stop U: The eastern and northern elevations of the development are visible in this view and almost completely close the lower sky gap between buildings above the vegetation in the garden of the four-storey block to the north. Both the magnitude and the significance of the change are judged to be medium/moderate.
204. The direction of change in most cases is judged to be neutral. In View 5, the direction would be beneficial, as the existing high boundary wall of the application site (with school buildings beyond) would be replaced with a new, high quality residential development with soft landscaping and greening adjacent to the footway. The direction of change in Views 3 and 4 is assessed as being slightly adverse due to the new development's prominence in these views, contrasting to the existing scale of the surrounding townscape. The adverse effect is mitigated by high quality design and materials, and simplicity of form in these views.

Conclusion/Summary

205. The visual impacts of the development, assessed via the submitted townscape views, are mixed. In some views, the magnitude of change is medium-high and of moderate significance. Officers consider that although in Views 3 and 4, the direction of change is adverse, these adverse effects are mitigated through the

quality of the design and materials and the simplicity of the form. As such the visual townscape impacts of the development are acceptable in accordance with London Plan Policy D9 and Local Plan Policies DC1, DC2 and DC3. Heritage impacts are assessed separately below.

Heritage impacts

Legislation and Policy Context

206. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties that apply when dealing with heritage assets in planning decisions. In relation to listed buildings, decision makers should “have special regard to the desirability of preserving the [listed] building or its setting or any features of special architectural or historic interest which it possesses.” (Section 66(1)). In relation to conservation areas, special attention must be paid to “the desirability of preserving or enhancing the character or appearance of that area” (Section 72(1))
207. London Plan Policy HC1 states that proposals affecting heritage assets (including non-designated heritage assets), and their settings should seek to avoid harm in the first instance, conserve the significance of the asset(s), and identify enhancement opportunities.
208. NPPF Policy HE4 requires that any harm to the significance of a designated heritage asset should have a clear and convincing justification Policy HE6 sets out how the effects on heritage assets should be assessed. It provides that where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Policy HE9 deals specifically with conservation areas. It states that not all elements of a conservation area will necessarily contribute to its significance. And further that where a development proposal would result in the loss of a building or other element which contributes to the character or appearance of a conservation area that is desirable to conserve, the assessment of impact should take into account the relative significance of the element affected and its contribution to the significance of the conservation area as a whole.
209. Local Plan Policy DC8 states that proposals which involve either substantial or less than substantial harm to the significance of a heritage asset should be refused unless it can be demonstrated that they comply with the relevant NPPF criteria.

Description and Significance of Heritage Assets

210. The application site is situated inside the Old Oak and Wormholt Conservation Area, which was designated in 1980 and derives its character and appearance from its cohesive and distinctive Interwar estate architecture, legible hierarchy of streets and open spaces, and prevailing two-storey residential scale. The application site forms part of the “Wormholt” sub-area of the Conservation Area which is complemented by Wormholt Park to the south.

211. There are no other designated or non-designated heritage assets on the site. The Cleverly Estate Conservation Area lies to the south-west of the Wormholt Estate and derives its significance from being a 1920's Peabody Trust housing estate with a notably elaborate exterior architecture.
212. Other, more distant, heritage assets are:
- Former Wormholt Library and Infant Welfare Centre, Grade II
 - Gatehouse at HMP Wormwood Scrubs, Grade II*
 - Chapel at HMP Wormwood Scrubs, Grade II*
 - Cell Blocks at HMP Wormwood Scrubs, Grade II
 - Former Warder's Homes 154-168 & 174-180 Du Cane Road, Locally Listed
 - Hammersmith Hospital, Entrance & Administration Block, Locally Listed

Direct impacts

213. The proposals involve the demolition of buildings inside the Conservation Area, which would constitute a direct heritage impact.
214. The school itself comprises a cluster of post-war buildings around a hard play courtyard area, surrounded by green infrastructure and ancillary external spaces serving the school. The site is described in the conservation area character profile as being 'tired and plain in appearance' and with 'little architectural or historic merit'. The profile also states that 'the buildings have poor street presence and do not make any particular contribution to the appearance of the Conservation Area'. The demolition of buildings that, at best, make a neutral contribution to the conservation area is not considered to result in any direct harm to the character or appearance of the conservation area.
215. The applicant's HTVIA identifies 13 key views from inside the conservation area and 2 from outside that are likely to be impacted by the proposed development. Because the development is inside the Conservation Area, any alteration to views from within or of it, is considered a direct impact. The level of harm identified within each view is set out in the table below.

View	Level of harm identified to the character and appearance of the CA
View 1: Junction of Wulfstan Street and Erconwald Street	No harm identified, development minimally visible.
View 2: Westway, outside St Katherine's Church.	No harm, development minimally visible.
View 3: Junction of Sundew Avenue and Milfoil Street.	Less than substantial harm, of a medium level.
View 4: Junction of The Curve and Orchid Street	Less than substantial harm, of a medium level.

View 5: The Curve, outside No.44	No harm identified due to the relatively low heritage sensitivity of this view.
View 6: Adelaide Grove, outside No.83	No harm, development minimally visible.
View 7: Wormholt Park, Southern entrance gate	No harm identified due to the relatively low heritage sensitivity of this view.
View 8: Wormholt Park Centre of Path	No harm identified due to the relatively low heritage sensitivity of this view.
View 9: Wormholt Park, Northern entrance gate	Less than substantial harm, at the lower end of the scale (very low)
View 10: Wormholt Park, by playground	Less than substantial harm, at the lower end of the scale
View 11: Bryony Road, entrance to Cambridge School	No harm, development not visible
View 12: Australia Road, junction with Lawrence Close	No harm, development minimally visible
View 13: Bloemfontein Road, Bus Stop U:	Less than substantial harm, at the lower end of the scale

Summary

216. Within the views where heritage harm is identified, the proposed residential blocks (owing to their height and bulk) would be particularly prominent and visibly distinct from the characteristic low-rise estate typology of the Old Oak and Wormholt estates. Within these views, the open sky views would be fundamentally altered through introducing a new element to the skyline of the view that noticeably exceed the established scale, height and massing that define the prevailing character of the conservation area.
217. GLA Officers concur with the Council's assessment that the residential elements of the proposal would result in harm to the character of the Old Oak and Wormholt conservation area and agree that this would result in less than substantial harm at the low/mid-range of the scale. This differs from the applicants' conclusions in their HTVIA which, in summary, concludes that there would be no heritage harm to any heritage asset.
218. There are no direct heritage benefits which would outweigh this harm taken alone.
219. As harm has been identified, the proposals do not comply with London Plan Policy HC1. In accordance with the NPPF, this identified harm will need to be weighed against the public benefits of the proposal as part of the overall planning balance and these elements are considered in the conclusion of this report.

220. No effects are identified to the setting of the Cleverly Estate Conservation Area, or any of the listed buildings identified in paragraph 218 above.
221. In coming to the conclusions above in relation to heritage impacts, GLA officers have taken account of the statutory duties contained in the Planning (Listed Buildings and Conservation Areas) Act 1990.

Archaeology

222. The site is not located within an Archaeological Priority Area (APA). The Environmental Statement submitted in support of this application states that:

“The site is considered to have a generally low archaeological potential for all past periods of human activity. Due to evidence of previous development within the site, it is assumed that the area has been subject to substantial ground disturbance through delivery of the two schools by 1960, that would have compromised the survival of any buried archaeological remains.”

223. The Greater London Archaeological Advisory Service (GLAAS) have commented on this application and have stated that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest. They concur that the 20th Century buildings will likely have truncated any archaeological remains and that therefore there is unlikely to be a significant archaeological impact requiring no further assessment or conditions. In respect of archaeology the proposal would comply with Policy DC8 of the Local Plan and Policy HC1 Part D of the London Plan.

Fire safety

224. In accordance with London Plan Policy D12 and updates to Planning Practice Guidance in relation to Fire Safety, the applicant has submitted a Fire Statement for the school and residential elements. It has been prepared by a suitably qualified, third-party assessor, to demonstrate that the development has been designed to offer a safe environment for future occupiers/ users.
225. In accordance with London Plan Policy D5, all buildings are served by two lifts, one designated as a firefighting lift, and the other as an evacuation lift for people who require level access from the buildings, to ensure safe and dignified emergency evacuation for all users.
226. The proposed development includes a building over 18 metres and as such, a referral to the Health and Safety Executive (HSE) Building Safety Regulator (BSR) Planning Gateway One was required. The Building Safety Regulator responded to the consultation, raising the following points regarding the fire safety strategy as it currently stands.

Measurements made by the BSR of the ground floor plan drawing, demonstrate that the vehicle landing point is located 47m from block E and 39m from block F, as shown in the ground floor plan excerpts below. In both cases, this greatly exceeds the cited fire safety standard of to within 18m of the fire main inlet connection point. This would result in excessive travel distance for firefighters carrying heavy equipment, potentially jeopardising firefighting operations.

Additionally, it should be assured that any removable bollards or security measures (gated access points) to restrict vehicular access in and around the site should not hinder emergency vehicle access.

The resolution of this concern is not insurmountable due to the proximity of available fire service vehicle landing points to the northern entrance of block E, and the southern entrance of block F directly from the roadside of 'The Curve', where alternative access to dry riser inlet connections and a protected internal route to each firefighting shaft could be provided.

...The BSR advises that a revised swept path analysis and fire service site plan demonstrating fire service vehicle access to within 18m of the dry riser inlets of blocks E and F, is provided for any future consultation request to be expedited.

227. To ensure that the above comments are fully addressed, a condition is attached for the revised swept path analysis and fire service site plan to be agreed by the Council and in consultation with Gateway One.
228. Subject to the attached conditions, the development is considered to comply with London Plan Policies D12 and D5 regarding fire safety planning requirements.

Impact upon neighbours' amenity

Policy Context

229. NPPF Policy P3 states that development proposals should be appropriate for their location, considering the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, whether these effects are on or off-site; and whether this is because of the development itself or the product of preexisting conditions in its vicinity. In assessing the potential effects of pollution, consideration should be given to the potential sensitivity of the site, and its intended occupiers and users, as well as that of the environment and population in the surrounding area (including where certain groups could be particularly vulnerable to its effects, such as children and older people).
230. London Plan Policy D1 requires new development to respond appropriately to its context, whilst Policy D6 of the London Plan requires development to provide sufficient daylight and sunlight to new and surrounding housing, whilst avoiding overheating, minimising overshadowing, and maximising the usability of outside amenity space. This is expanded in the Mayor's Housing SPG which states that: "an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets."
231. Local Plan Policy HO11 states that development proposals that provide housing should respect the principles of good neighbourliness. To achieve a high standard of design, protection of existing residential amenities will be taken into account, including issues such as loss of daylight, sunlight, privacy and outlook.

232. Local Plan Policy DC2 (Design of New Build) states that all new builds must be designed to respect good neighbourliness and the principles of residential amenity. Policy DC1 (Built Environment) and DC3 (Tall Buildings) require development to be well designed and respect of the principles of good neighbourliness. Key Principles HS6 and HS7 of the Planning Guidance SPD (2018) seek to protect the existing amenities of neighbouring residential properties, in terms of outlook, light, and privacy.

233. Local Plan Policy DC2 requires new build proposals to be formulated to respect the principles of good neighbourliness. Policy CC11 requires noise-sensitive development such as nurseries to provide adequate mitigation measures of protection from the proposed use.

Planning Assessment

Daylight and Sunlight

234. The applicant's Daylight and Sunlight report, produced by Point 2 Surveyors, considers the development's impact against the 2022 BRE guidance 'Site layout planning for daylight and sunlight'. The report's calculations are based on a 3D contextual model created from survey data alongside the application's plans and drawings. Floorplans have been obtained for a number of neighbouring properties from either LBHF Planning records or estate agents' details. Where it was not possible to obtain floorplans, layouts have been replicated based on similar properties which is common practice where specific layout information is unavailable. A plan showing the tested properties is below:

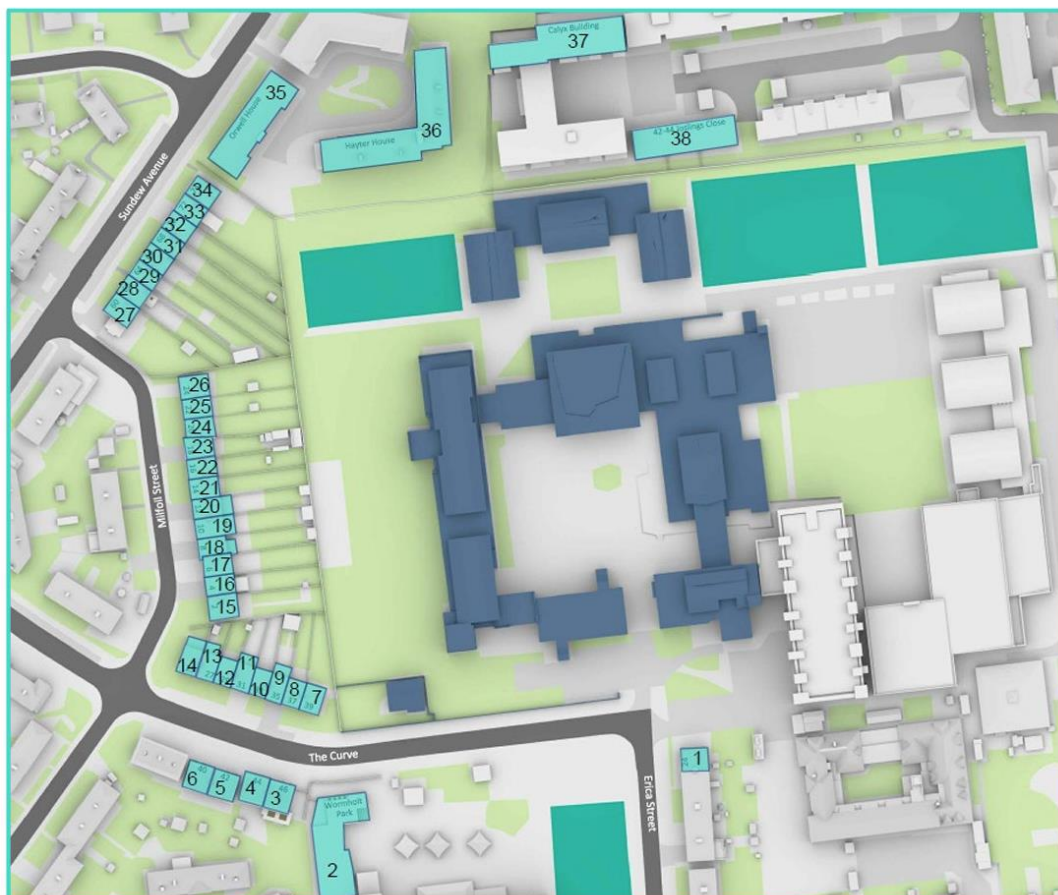


Figure: Neighbours assessed for light impacts

235. In urban and city centre areas, BRE Guidelines advise that the guidance be applied flexibly. The BRE itself suggests alternative targets to the standard values for dense urban environments, regeneration areas, or “hard to light” properties, although these are not relied upon as part of the applicant’s main assessment which has carried out an assessment against the standard BRE targets.
236. The BRE guidance includes the following tests:
- **Vertical Sky Component (VSC) Test** – Measures the amount of visible sky at the centre of a window and indicates the potential for daylight entry. If the VSC falls below 27% and is reduced by more than 20% compared to the existing condition, the impact is usually perceptible (NB – perceptible does not automatically equate to unacceptable).
 - **No Sky Line (NSL) Test** – Identifies how much of a room’s working plane receives a direct view of the sky. If less than 0.8 times the previous NSL area remains lit after a new development, this indicates a usually noticeable reduction in daylight.
 - **Annual Probable Sunlight Hours (APSH) Test** – Measures the percentage of direct sunlight a window receives throughout the year and applies only to windows facing within 90 degrees of due south. A reduction to less than 0.8 times the previous APSH is likely to be significant.
237. The existing buildings on the site are set well away from the boundaries with residential neighbours, and as such, the existing light levels to these properties are, arguably, unusually good for an urban location. The tallest buildings on the western part of the site are four storeys. Furthermore, the presence of existing building features such as balconies and external walkways can reduce existing VSC values at windows neighbouring a site. Where balconies or overhangs are present, alternative VSC values (one with these obstructions in place, and one with their effect removed from the calculations) is a common alternative assessment to demonstrate the effect of the existing feature vis a vis the new development.
238. Out of 38 tested neighbouring properties, 32 would fully adhere to the BRE guidelines for daylight (VSC and NSL) and sunlight (APSH). This leaves 6 properties that would experience changes that fall short of the BRE guidelines. These are discussed in turn below:
239. 39 The Curve is a two-storey dwellinghouse located to the west of the site. The first-floor rear windows have relatively deep overhanging eaves, which have a limiting effect on existing VSC (28%) relative to ground floor windows (35%) which are not constrained by the eaves. When the eaves are considered, the results are:
- VSC: 3 of the 5 windows meet recommendations. The other two windows experience changes of 20.2-24.3% which are slightly above the BRE recommended 20%. NB: Under the eaves-removed scenario both windows meet the BRE.
 - NSL: All 4 habitable rooms assessed meet the BRE recommendations.

- APSH: The main southerly oriented habitable room meets the BRE recommendations.
240. 27 The Curve is a two-storey dwellinghouse located to the west of the site. It is a similar property to No.29 with regards to existing eaves at first floor level. The assessment treats the ground floor semi-transparent lean-to as opaque, representing in a 'worst case' scenario. When the eaves and lean-to are considered, the results are:
- VSC: 2 of the 3 windows meet recommendations. The other window [underneath the lean-to] would experience a very high 70.9% change, leaving it with a 0.5% VSC, compared to 1.8% in the existing condition. Although this change seems significant, the absolute change given it is already heavily overshadowed is likely to be insignificant.
 - NSL: All 3 habitable rooms assessed meet the BRE recommendations with no change.
 - APSH: The rear elevation is northerly oriented, and these rooms are not eligible for assessment.
241. 14 Milfoil Street is a two-storey dwellinghouse located west of the site which also has overhanging eaves. When the eaves are considered, the results are:
- VSC: 2 of the 3 windows meet recommendations. The remaining window would experience a change of 21.6% slightly beyond the BRE recommended 20%. Under the eaves-removed scenario this window would meet the BRE.
 - NSL: All 3 habitable rooms meet the BRE recommendations.
 - APSH: The rear elevation is northerly oriented, and these rooms are not eligible for assessment.
242. Orwell House is a four-storey flat block located to the north-west of the site. Each of the flats have windows that are overhung by access decks, which limits existing VSC values. When the access decks are included, the results are:
- VSC: 21 of the 24 main windows would meet BRE recommendations. The remaining 3 windows would experience changes of between 25-31%. Each of these are located underneath the access decks, and under the decks-removed scenario, all three would comfortably meet BRE recommendations.
 - NSL: All 24 habitable rooms would meet the BRE recommendations.
 - APSH: All 24 southerly oriented rooms would meet the BRE recommendations for APSH.
243. Hayter House is a five-storey flat block located to the north of the site. Some of the windows also have deep roof eaves/balconies limiting existing VSC values. This building overlooks the derelict hard courts at the moment and so has almost

unrestricted access to daylight. As such these properties experience amongst the greatest impact. The results are:

- VSC: 41 of the 64 windows would meet the BRE recommendations. The remaining 23 windows would experience changes of between 20.5%-47.9%. The windows with the highest changes are located within inset balconies or underneath roof eaves.
- NSL: 40 of the 44 habitable rooms assessed would meet the BRE recommendations. Of the remaining four rooms, three are believed to be bedrooms and would experience changes of between 20.2-40.8%. The other room is understood to be a reception room and would experience a change of 22.3%, slightly above BRE recommendations.
- APSH: All 36 southerly oriented rooms would meet the BRE recommendations.

244. The Calyx Building is a flat block with a stepped massing located north of the site. A number of windows are located underneath projecting balconies for the flats above. The with-balconies results are:

- VSC: 124 of 147 windows would meet BRE recommendations. The remaining 23 windows would experience changes of between 21.7-63.8% but all of these are located underneath projecting balconies.
- NSL: 103 of the 111 habitable rooms assessed would meet the BRE recommendations and the remaining 8 would experience reductions of between 21.6-58.3%. The rooms with the larger changes are understood to be bedrooms, with LKD's experiencing changes up to 34.8%.
- APSH: 105 of the 111 southerly oriented rooms would meet BRE recommendations. The remaining 7 rooms are understood to be bedrooms.

245. Overall, Officers consider that the results show the impacts to neighbouring properties would be in keeping with what might be expected from major developments in built-up areas in London. In each of the affected properties, most of the windows meet the BRE recommendations in full, and where there are exceedances often these are relatively minor. There are clear instances of more significant reductions in daylight to neighbouring properties, particularly to the north, but this is at least partly a function of the open character of the existing site. In all cases, existing building features also contribute to reduced light levels within the properties.

246. On balance, Officers consider that the impacts are acceptable when considered in the planning balance, having regard to the fact that the proposal represents more efficient, optimal use of the site and would result in numerous public benefits (see Planning Balance section of this report).

Outlook/ Sense of enclosure

247. As a guide to assessing impact on outlook and sense of enclosure, Key Principle HS6 of the LBHF Planning Guidance SPD utilises an angle of 45 degrees from ground level where the adjoining garden is less than 9m long, or from a point 2

metres above ground level where the gardens are more than 9m long. The guidance is that new development should not infringe this angle but allows for on-site judgement and contextual assessment in determining whether the impact is acceptable. KP HS6 applies most directly where a development site backs directly onto adjoining properties.

248. As shown in the diagrams below, the proposed residential blocks would very slightly infringe the 45-degree angle in relation to properties on Sundew Avenue but would comply with the 45-angle in relation to properties on Milfoil Street. There would also be a slight infringement in relation to Hayter House and the Calyx Building, although the tallest part of the massing has been deliberately set away from the boundaries with these neighbours, with a stepping down towards the western boundary.

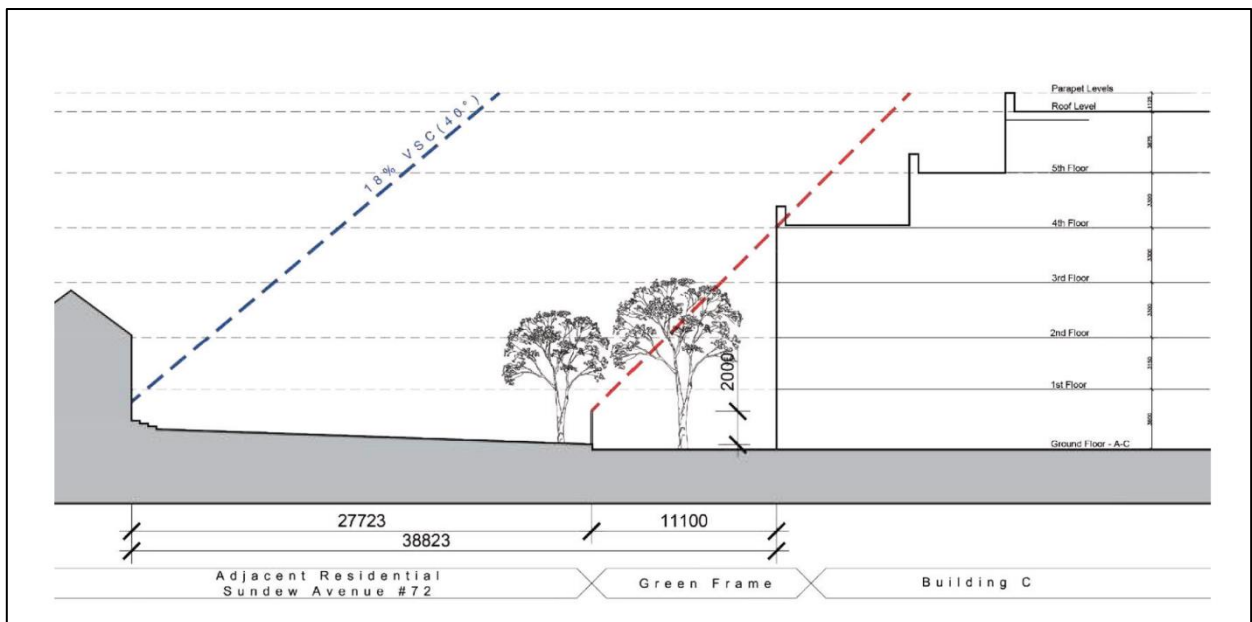


Diagram showing 45-degree angle from 2 metres on the boundary with adjacent residential properties (72 Sundew Avenue)

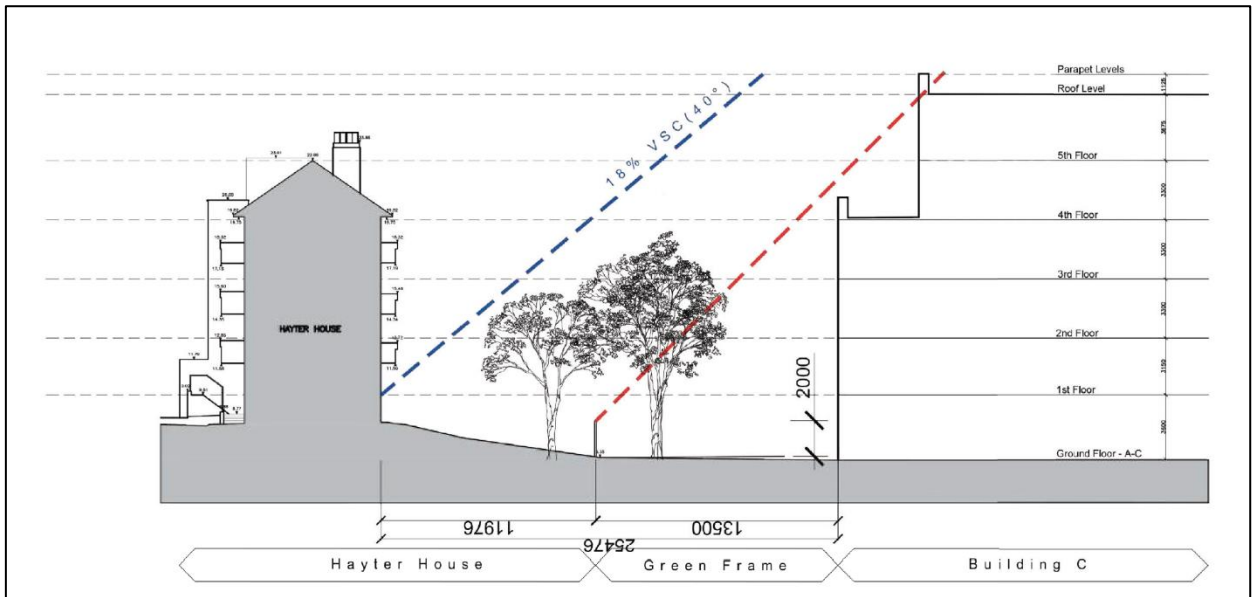


Diagram showing 45-degree angle from 2 metres on the boundary with adjacent residential properties (Hayter House)

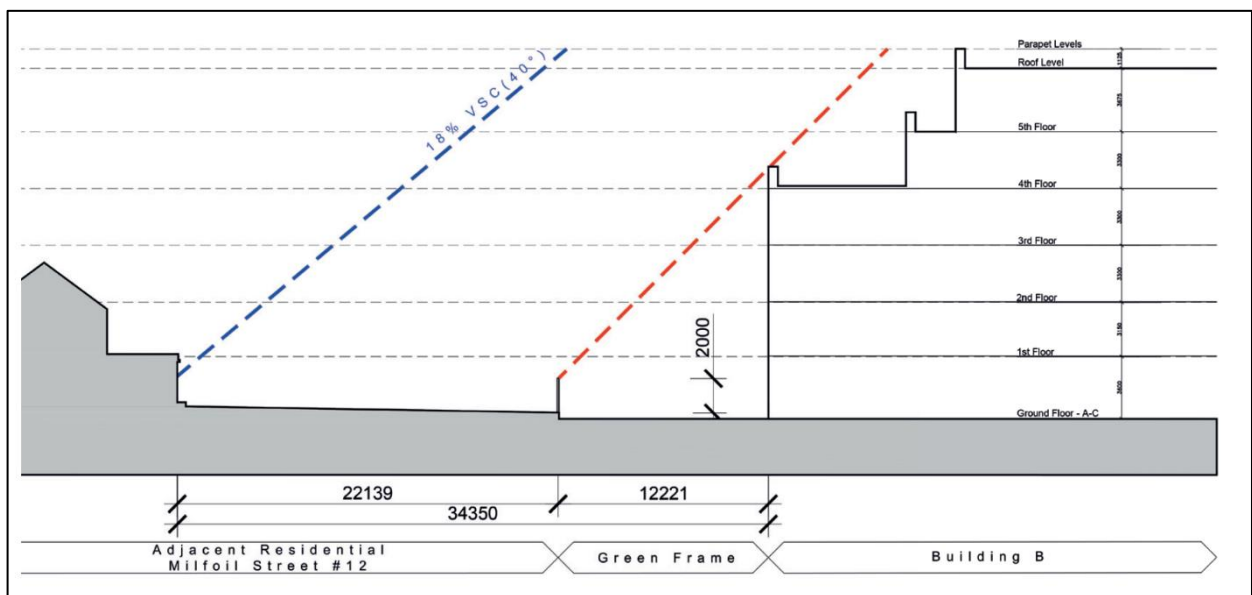


Diagram showing 45-degree angle from 2 metres on the boundary with adjacent residential properties (12 Milfoil Street)

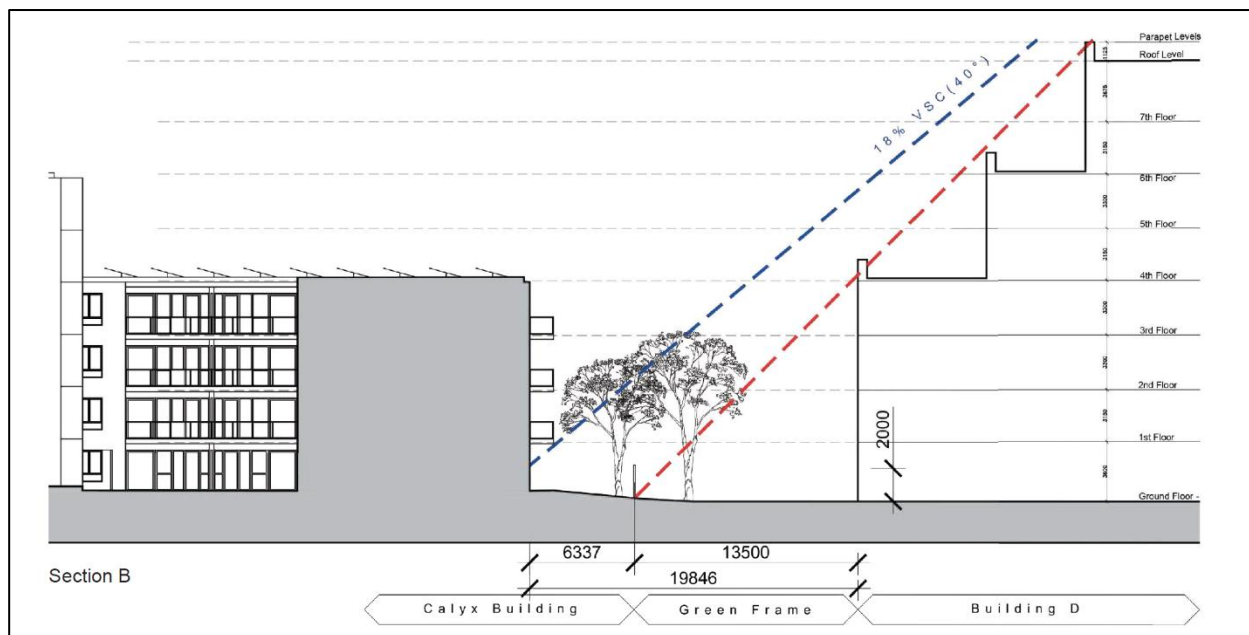


Diagram showing 45-degree angle from the boundary at ground level with adjacent residential properties (Calyx Building)

249. There would clearly be a significant change in what can be seen from the rear windows of these properties. The new development would be clearly perceptible. That said, visibility does not automatically amount to a harmful sense of enclosure that would affect the wellbeing of occupants and their ability to enjoy their homes and gardens. At the closest point, the new built form of the flats would be 38.8 metres away from the rear elevation of the houses on Milfoil Street, set away from the boundary itself by 11 metres. Officers are satisfied that the distances between the new development and the existing homes, together with the proposed stepped massing away from the boundary, mitigates against a harmful sense of enclosure for neighbours.

Overlooking/ privacy

250. The design of the new residential buildings has considered minimising the potential for overlooking by setting the buildings away from the immediate boundary with the residential neighbours.
251. The proposed levels of window-to-window distances range from 35m to 30m to the existing residential neighbours to the west along Milfoil Street. To the north the distances to Hayter House are approximately 25m. The window-to-window distances to the Calyx Building are approximately 20m. Northwest the properties along Sundew Avenue and Orwell House have distances of over 35m, and the views towards these neighbours would not be direct due to the buildings being splayed at an oblique angle. Similarly, the neighbours at 25-39 The Curve are physically situated closer to the new buildings, the shortest distance being 14.5m however due to the position of these neighbours there would not be direct window to window overlooking at this distance. Whilst some of the overlooking at this distance would be over garden area, officers consider this would be acceptable.
252. Overall, the proposed separation distances between new and existing residential properties, as well as within the development, would be sufficient to maintain

reasonable levels of privacy for occupiers. All distances exceed the minimum thresholds set out in Key Principle HS7 of the Planning Guidance SPD, and in the one instance of a property on The Curve where a distance falls below 18m, the neighbouring building is not directly aligned with new window openings, preventing harmful direct overlooking. Therefore, the development would provide acceptable standards of privacy in accordance with the NPPF, London Plan, and Policy DC1 and DC2 of the Local Plan.

Noise and disturbance

253. Educational operational noise levels are unlikely to significantly increase compared to existing levels and the new residential element would not be likely to give rise to any significant adverse noise impacts on the occupants of the new homes nor adjacent sensitive residential receptors. In these respects, the development complies with London Plan Policy D14 and Local Plan Policies CC11 and CC13. Conditions are recommended to ensure that school lights are turned off during darkness hours when the buildings are not in use, and that doors will not be fixed open at any time, to avoid any potential issues with noise or light pollution.
254. During demolition and construction, the implementation of good industry standards, guidance and practice procedures are secured by condition through a Demolition and Construction Management Plan to minimise noise, dust and vibration to neighbours. A condition is also recommended for details of the solid construction hoarding to be erected around the site.

Conclusion/Summary

255. This report has assessed the impact of the new development on the amenity of adjoining homes. With regards to daylight, some significant impacts have been identified, but on balance and in view of the specific circumstances of this site, those impacts would not be serious or harmful enough to justify refusal of the application. Impacts with regards to privacy, outlook, and noise are acceptable. The development therefore complies with Policies D1, D3 and D14 of the London Plan and Policies CC11, HO11 and DC1 of the Local Plan. No objections are raised in terms of Key Principles HS6 or HS7 of the Planning Guidance SPD.

Highways and Transport

Policy Context

256. NPPF Policy TR4 states that transport considerations are integral to the design of developments, which should: (a) give priority to walking, wheeling and cycling; (b) incorporate or contribute towards features to support this; (c) ensure all routes are safe, inclusive and attractive for all users; (d) allow for the efficient delivery of goods and ease of access for emergency services; and (e) provide a suitable number of parking spaces for a range of modes as appropriate. Policy TR6 sets out how transport impacts should be assessed.
257. Policies T1-T7 of the London Plan set out that all development should make the most effective use of land, reflecting connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on

London's transport networks and supporting infrastructure are mitigated. These policies also provide cycle and parking standards.

258. Local Plan Policy T1 sets out the Council's intention to 'work with strategic partners to improve transport provision, accessibility and air quality in the borough, by improving and increasing the opportunities for cycling and walking, and by improving connections for bus services, underground, national and regional rail'. Local Plan (2018) Policy T2 relates to transport assessments and travel plans and states "All development proposals would be assessed for their contribution to traffic generation and their impact on congestion, particularly on bus routes and on the primary route network". Local Plan Policies T3, T4, T5 and T7 relate to opportunities for cycling and walking, vehicle parking standards, blue badge holders parking and construction logistics. In addition, Local Plan Policy CC7 sets out the requirements for all new developments to provide suitable facilities for the management of waste.
259. Local Plan Policy T4 and Key Principle TR3 of the Planning Guidance SPD sets out vehicle parking standards and states that the council will require car parking permit free measures on all new developments, particularly those in Public Transport Accessibility Level (PTAL) areas of 3 and above, unless evidence is provided to show that there is a significant lack of public transport available. London Plan Policy T6 specifies that car-free development should be the starting point for all development proposals in places that are well connected by public transport.

Planning Assessment

260. The existing site has a very low PTAL rating of 1b, however, the Government's NPPF Connectivity Tool gives the site a score of 86/100, and Officers consider the site to be a relatively accessible location within an inner London borough and fare zone 2. Wood Lane, White City and East Acton stations are all a 15-minute walk from the existing school entrance with access to bus routes considerably closer.

Impact on public transport services and local roads

261. The proposed trip generation figures for the residential element of the scheme uses appropriately selected sites from the TRICS database and is considered acceptable. During the weekday AM peak (08:00–09:00), the residential development is forecast to generate 135 total person trips, comprising 23 arrivals and 112 departures.. In the PM peak (17:00–18:00), the development is expected to generate 113 total person trips, comprising 65 arrivals and 47 departures.. Given the car free nature of the site aside from blue badge bays, residents would be using sustainable and active modes to travel to and from the site, and as such the estimated trips would not be considered to have a significant impact on the local highway network.
262. During the weekday AM peak (08:00–09:00), the school use is forecast to generate 900 pupil and staff arrivals/departures in total at full capacity, with the vast majority travelling by sustainable modes, predominantly walking and bus. Based on the stated target mode shares, only around 36 pupil car drop off trips and approximately 18 staff car driver trips are expected during the peak period. In the PM peak (15:00–16:00 for pupils; 17:00–18:00 for staff), a similar pattern is

anticipated, with very limited car activity relative to the overall trips. It has been stated within the transport assessment that future car movements associated with the school will remain modest, with the car-based mode share of staff and pupil trips forming only a small proportion of total school travel demand.

263. A financial contribution of £36,000 towards Step Free Access provision at White City station has also been identified by TfL and agreed by the applicant and is secured within the S106 agreement. TfL is currently progressing proposals to provide step-free access and increase station capacity at White City Underground station. In line with London Plan Policies T3 and T4, developer contributions are sought from developments that generate additional trips through the station. additional trip distribution information supplied by the applicant indicates that the proposed residential development will generate 22 AM peak and 14 PM peak trips via White City station. The agreed financial contribution of £36,000 has been calculated using a proportional method as established for other sites within the vicinity.

Car Parking

264. The residential use is proposed as car free aside from 10 blue badge bays (3% provision) which is in line with London Plan. EV charging infrastructure will also be required for all spaces, with 20% being provided as active and the remaining 80% as passive provision. The S106 agreement includes an obligation that the new residents of the development will be ineligible to hold Parking Permits for parking on local roads, to ensure the development does not give rise to additional parking pressure as well as to encourage sustainable and active travel.
265. Regarding the school use, the Transport Assessment states that there are currently 68 car parking spaces on site including 4 blue badge bays, which forms the application's assumptions in relation to the proposed overall reduction in spaces to a proposed 38.
266. The London Plan requires that any operational car parking is the minimum necessary. In response to Officer queries, the applicant maintains their position that the level of school parking represents the minimum necessary required for the safe and effective operation of the school. The car park is designed to accommodate staff, visitors with a need to attend the site, accessibility requirements, safeguarding-related attendance, deliveries, emergency access and the practical management of the school day. Travel demand will be proactively managed by the academy through site procedures and visitor controls, which will be set out in the School Travel Plan (a requirement of the S106 agreement). A Car Parking Management Plan for the school is also recommended to be secured by condition.
267. Officers do not raise any further objections to the proposed level of school parking and there is no conflict with London Plan policy. It is acknowledged that operational parking requirements go beyond staff car parking. The applicant has provided a reasonable justification for the proposed provision and, on balance, it is considered acceptable given that it represents a reduction of 20 spaces compared to existing.

Improvements to facilitate active travel

268. The applicant's Active Travel Zone (ATZ) assessment identifies a number of shortcomings in pedestrian and cycle infrastructure, and improvements that could be made along the most common routes between the development and local shops and services. A number of crossings on key routes assessed did not include tactile paving or suitable dropped kerbs. Furthermore, it was identified that the pedestrian bridge across the Central Line tracks from Bentworth Road to Ducane Road did not provide adequate access for cyclists. Officers' analysis has also identified that there could be improvements made to the bridge in terms of lighting and CCTV in line with the Mayor's 'Tackling Violence Against Women and Girls (VAWG) Strategy'. A financial contribution of £150,000 towards these improvements is secured by planning obligation, a figure identified by Officers and agreed with the applicant. This contribution will act as mitigation towards an increase in active travel trips to and from the residential development and secure important improvements, including to lighting and CCTV, to enhance feelings of safety and security including at night.

Cycle parking

269. The total number of long and short stay cycle parking proposed for the residential element is compliant with London Plan Policy T5 and therefore acceptable. Full details are to be secured by pre-occupation condition, which will need to include manufacturers' specification, spacing, access routes, security, lighting, gradient, door widths, accessibility for non-standard cycles etc. All stores must comply with London Cycling Design Standards. A separate condition is also included for details of long and short stay cycle parking for the school use. Separately, a School Cycle Parking Management plan condition is also recommended to cover access, maintenance, security and supervision.

Servicing and Waste Collection

270. The servicing strategy for the residential element is acceptable in principle. The development provides on-site servicing areas, including access adjacent to the concierge, which will help reduce dwell times and avoid multiple drops at individual cores. Swept path analysis confirms that delivery and refuse vehicles can enter and exit the site in forward gear. However, given the constrained internal layout and proximity of pedestrian routes, a Delivery and Servicing Management Plan will be required via a pre-occupation condition to set out clear operational measures, including booking systems and arrangements for managing peak periods. The plan should also demonstrate how pedestrian conflicts will be avoided within the internal shared spaces.

271. For waste collection, the principle of on-site collection (except for Block F, which will be served from The Curve) is acceptable and further details of the waste collection strategy are to be provided as part of the Delivery and Servicing Plan condition for the residential development, with the associated monitoring fee secured within the S106.

272. The proposed servicing and waste collection arrangements for the school are also broadly acceptable. Consolidating all deliveries and waste collection at the eastern access on The Curve reflects existing practice and is operationally appropriate for the redeveloped school. Swept path analysis confirms that service and refuse vehicles can enter and exit safely in forward gear. Final details must be

secured via a preoccupation condition, including service vehicle scheduling, management responsibilities, and measures to ensure no servicing occurs during pupil arrival or departure periods. The school will also need to confirm how the internal movement of waste from the building to the collection point will be managed safely without conflict with pupils or staff. These operational requirements will be captured within a School Delivery & Servicing Management Plan which is also recommended to be secured by condition.

Demolition and Construction Logistics

273. A fully detailed Demolition and Construction Logistics Plan is recommended to be secured as a pre-commencement condition to ensure appropriate vehicle routing for the demolition and construction phases of the development. The applicant has committed to sign up to the Construction Logistics and Community Safety (CLOCS) standard and all construction vehicle operators will be required to detail how they will adopt either FORS or CLOCS and register for membership. FORS Silver accreditation will be required for all construction vehicles.

Works to the public highway

274. The S106 agreement requires the developer to enter into a Section 278 agreement with the Council to facilitate works to the public highway outside the site including construction of a new vehicle access; upgrading and resurfacing the footway on The Curve; relocation of street parking bays, and provision of a dockless-cycle-hire bay.

Conclusion/Summary

275. The scheme is broadly consistent with national, London and local transport policies. Its car-free residential approach, the reduction in school parking, sustainable travel measures and mitigation contributions ensure the transport impacts are acceptable. Operational, servicing and highways matters are controlled through the attached conditions and obligations. Therefore, the proposal complies with NPPF Policy TR4. London Plan Policies T1–T7 and Local Plan Policies T1–T7 and CC7

Energy use and carbon reductions

276. Policy SI2 of the London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site by implementing the Energy Hierarchy, a contribution to a carbon offset fund or reductions provided off site can be considered.
277. Local Plan Policy CC1 requires all major developments to implement energy conservation measures with a view to reducing carbon dioxide emissions. The policy, however, refers to the previous version of the London Plan and has therefore been partly superseded by the more up-to-date requirements contained in the 2021 London Plan.

278. The applicant has submitted an energy statement which sets out the target energy efficiency improvements and carbon emissions reductions for the proposal.

Carbon reduction – residential

279. The energy statement shows that for the residential element of the proposal, the proposed 'Be Lean' building fabric energy efficiency measures are calculated to provide an 18% improvement in CO2 emissions compared to the 2021 Building Regulations baseline level. This exceeds the London Plan's 10% Be Lean target.
280. The main source of heating and hot water provision for the new homes will be an Air Source Heat Pump (ASHP)-based communal system which will be capable of connecting to a wider heat network in future, if one were to come forward in this part of the borough in future. Renewable energy generation is also proposed through solar PV panels on the roofs of the residential blocks.
281. In total, the full suite of on-site carbon reduction measures would reduce CO2 emissions for the residential element of the scheme by 70% compared to 2021 Building Regulations, which significantly exceeds the London Plan minimum target of 35% and exceeds the GLA's benchmark for major residential schemes of at least a 50% reduction.

Carbon reduction – school

282. The proposed 'Be Lean' building fabric energy efficiency measures for the school are calculated to provide an 18.21% improvement in CO2 emissions compared to the Building Regulations baseline level. This meets the 15% target for non-residential developments in London Plan Policy SI2. The submitted Sustainability Statement also highlights that it should be possible for the school development to achieve BREEAM 'Excellent' and this is secured by condition.
283. The main source of heating and hot water provision for the school will also be a communal ASHP-based system, which would be capable of future connection to a local heat network. Renewable energy generation is also proposed in the form of solar PV panels on the roof of the school buildings.
284. In total, the full suite of carbon reduction measures would reduce CO2 emissions by 41% compared to 2021 Building Regulations which also exceeds the London Plan requirement of a 35% reduction.

Carbon offset

285. To achieve full net zero carbon, there is a requirement for a carbon offset payment to be made. Utilising the GLA's pricing of £95/tonne, this is calculated to be:
- Residential element: £315,657
 - School element: £23,883
286. Under the new 'sliding scale' mechanism set out in the LBHF carbon offsetting guidance note from July 2025, the required carbon offset payment would be:
- Residential element: £1,092,576.

- School element: £111,471

287. The £95/tonne flat London Plan rate is an expressly recognised and viability-tested methodology for calculating the residual carbon offset. It is noted that LBHF's higher sliding-scale mechanism is a local approach, not a mandatory requirement. The Deputy Mayor has discretion as decision maker to determine the appropriate carbon offset contribution and the London Plan expressly permits the use of the nationally recognised £95/tonne price. The scheme is already delivering a strong level of affordable housing, together with a package of other planning benefits including £36,000 towards Step Free Access at White City station. GLA Officers' experience of current market conditions affecting other major housing schemes suggests that the proposed affordable housing offer is also likely to be a growth-based offer exceeding current day viability challenges. Against this background, there is a strong case for ensuring that any additional financial obligations are proportionate and do not undermine the overall viability of the scheme. It is for this reason that the London Plan rate has been applied in this instance.

Whole Life Cycle Carbon

288. In accordance with London Plan Policy SI2 the applicant has submitted a Whole Life Cycle Carbon which has been assessed by GLA Officers and is acceptable. A condition is applied for a post-completion monitoring report to be submitted.

Circular Economy

289. In accordance with London Plan Policy SI7 the applicant has submitted a Circular Economy Statement, which has been assessed by GLA Officers and is acceptable. A condition is applied for a post-completion monitoring report to be submitted.

Biodiversity and Urban Greening

Policy context

290. A 10% Biodiversity Net Gain is a statutory requirement under Schedule 7A of the Town and Country Planning Act 1990, as inserted by Schedule 14 of the Environment Act 2021. The statutory BNG can be secured by planning condition if necessary.

291. NPPF Policy N2 emphasises using green infrastructure and nature-based solutions to secure multiple benefits within schemes, including biodiversity, surface water management, water quality, climate change mitigation and adaptation, and recreation.

292. London Plan Policy G5 states that major development should contribute to the greening of London, incorporating measures such as high-quality landscaping, green roofs, green walls and nature-based sustainable drainage. The policy recommends a target score of 0.4 Urban Greening Factor (UGF) for residential developments and 0.3 for predominantly commercial developments.

293. Local Plan Policy OS1 states that biodiversity within the borough should be protected, enhanced, and increased the provision of parks, open space and biodiversity in the borough. Policy OS5 seeks to enhance biodiversity and green infrastructure in the borough by maximising the provision of gardens, garden space and soft landscaping, and seeking green and brown roofs and planting as part of new development; seeking retention of existing trees and provision of new trees on development sites; and adding to the greening of streets and the public realm.

Planning Assessment

294. A Tree Survey and Impact Assessment (including Tree Survey Schedule, Tree Constraints Plan and Tree Protection Plan), have been provided in support of the application, which sit alongside the landscape drawings and landscape statement. A Biodiversity Net Gain Assessment has also been provided.
295. The submitted Landscape Strategy confirms that the proposal would attain a London Plan compliant Urban Greening Factor of 0.4; compliance with this score and the UGF surface cover plan is secured by condition.
296. Of the existing trees on site, 2 are Category A trees and 3 Category B trees. Five of these higher quality trees (including both the Category A specimens) are located primarily along the site boundaries, and consequently can all be retained, with the exception of a Lime (T19 Category B) which is sited within the open space in the west of the site and would be lost as a result of the development, along with a large number of relatively-lower value Category C and U trees. It is noted that the site is located within a conservation area, and that all trees at present benefit from the statutory protections afforded by this designation but none are subject to a Tree Preservation Order. Protection of existing trees during demolition and construction works is secured by condition.
297. One Category Tree B (Tree 19) is to be felled. Category B trees are of moderate value and generally worthy of retention where practicable, but mitigation for the loss of Tree 19 is provided through a comprehensive landscaping scheme for the new development, which introduces 154 new trees, representing a substantial increase in overall tree numbers. The proposed planting strategy has been designed not only to compensate for the loss of the Category B tree but also to improve the overall quality, provide enhanced visual amenity, increased canopy cover, suitable for the proposed use to provide appropriate solar shade, as well as biodiversity benefits. The new tree planting is secured through compliance with the Urban Greening Plan, as noted above.
298. The updated Biodiversity Net Gain Assessment identifies a net gain of c.19% overall in compliance with the statutory minimum. A condition for a Habitat Management and Monitoring Plan for habitat retention, enhancement, creation and long-term management over 30 years is attached to secure the BNG. However, the BNG Trading Rules are not satisfied due to the net loss of 0.06HU derived from heathland and shrub habitats on the existing site that would not be directly replaced under the proposals. Off-site compensation options should be investigated following the BNG mitigation hierarchy order i.e. Off-site (within the client's ownership), Off-site (outside of the client's ownership), Local Market Analysis or Purchasing Statutory Credits (as a last resort). In this instance, given

the low number of units required, this will be provided through off-site compensation through a third-party organisation such as habitat banks. The purchase of these HU is secured through a planning condition requiring a Biodiversity Gain Plan (BGP).

299. Council Officers raised concerns that there may have been a 'double counting' of play spaces that are also intended to provide biodiversity value, to the detriment of both objectives. GLA Officers' review of the updated Biodiversity Net Gain suggests that most of the areas containing play are counted as 'developed land/ sealed surface' under the BNG calculation which does not have any habitat units associated with it. The soft planting in these spaces is counted as 'introduced shrub' but this would not present a conflict with the play surface and equipment itself. Most of the post-development Biodiversity Net Gain arises from tree planting, with shrubs and rain gardens making a lesser contribution. No significant conflict between habitat and play is identified, and this is not considered to give rise to a policy conflict.
300. In these respects, the proposals are found to comply with NPPF Policy N2, London Plan Policy G5, and Local Plan Policy OS1.

Land Contamination

301. NPPF Policy P2 states planning decisions should ensure that sites are suitable for its new use taking account of ground conditions and after remediation the land should not be capable of being determined as contaminated land. Local Plan Policy CC9 states that the Council will support the remediation of contaminated land and that it will take measures to minimise the potential harm of contaminated sites and ensure that mitigation measures are put in place. The Policy requires applicants to carry out site assessment and submit a report of findings on sites where contamination is known to be present, to establish the nature and extent of contamination.
302. A Preliminary Geoenvironmental Report has been submitted as part of the application documents, which was prepared by AP Geotechnics. This found that made ground, hardstanding and clay was found across the site following borehole investigations. Silt and sandy gravel were also found across the site. Given that made ground was found across the site, all remnants of previous construction will need to be removed prior to the redevelopment. Hammersmith and Fulham's suite of sequential conditions regarding identification and remediation of land contamination are recommended, and subject to these conditions, Officers consider that the proposed development accords with Policy SD1 of the London Plan and Policy CC9 of the Local Plan.

Flood Risk and Sustainable Drainage

Policy Context

303. NPPF Policies F4 and F5 state that inappropriate development in areas at risk of flooding should be avoided by directing development away from the areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Policy CC3 states that, to adapt to climate

change, sustainable drainage systems should be incorporated into new developments to manage surface water flow rates.

- 304. London Plan Policy SI12 states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed, Policy SI13 sets out the same requirement and additionally states that proposals for impermeable paving should be refused and that drainage should be designed and implemented to address water efficiency, water quality, biodiversity and recreation.
- 305. Local Plan Policy CC3 requires that new development reduce the use of water and be designed to take account of increasing risks of flooding. Policy CC4 states that new development would be expected to manage surface water run off by implementing a range of measures, such as sustainable drainage systems (known as SuDS) where feasible, and the use of water efficient fittings and appliances.

Planning Assessment

- 306. The site is in the Environment Agency's Flood Zone 1, which indicates a relatively low risk of river flooding from the Thames. However, due to the size of the site, a Flood Risk Assessment (FRA) has been submitted to consider the risk of flooding from all sources. No basement levels are proposed, and groundwater and internal sewer flooding risks are low. Some parts of the site appear to be at risk of surface water flooding, with some areas classified as 'high risk'.
- 307. The large 2.96-hectare site has been subdivided into 5 catchments across 2 development areas (Western parcel – residential scheme and Eastern parcel – school redevelopment) for the purpose of assessing surface water drainage designing a suitable drainage strategy approach. It is proposed to restrict discharge rates from the whole site to 4.1 l/s/ha which represents the greenfield rate for the site and would provide a significant reduction in surface water discharge to the sewer (95%+ reduction for the 1 in 100-year storm event).
- 308. Consideration has been given within the report to surface water management measures to help manage stormwater using Sustainable Drainage Systems (SuDS). It is proposed to include features such as a rainwater harvesting system, green roofs, soft landscaping measures such as rain gardens, bioretention basins, underground attenuation tanks, rainwater harvesting, green roofs and permeable paving. A condition is attached requiring full details of the final SuDS scheme proposed for the residential and school developments along with details of future maintenance.
- 309. Officers therefore consider that subject to conditions requiring compliance with the Flood Risk Assessment and the submission of an updated SuDS strategy and maintenance plan, the proposed development accords with London Plan Policies SI12 and SI13 and Policies CC3 and CC4 of the Local Plan.
- 310. It is noted that Thames Water provided a consultation response and did not raise any objections to the proposals. However, conditions regarding piling are recommended, to ensure the building works do not pose a risk to subsurface infrastructure.

Air Quality

Policy context

- 311. NPPF Paragraph 124 relates to air quality, and states planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.
- 312. London Plan Policy SI1 states that development proposals should not lead to deterioration of existing poor air quality, create any new areas that exceed air quality limits or create unacceptable risk of high levels of exposure to poor air quality.
- 313. Local Plan Policies CC1 and CC10 seeks to reduce potential adverse air quality impacts arising from new developments and sets out several requirements. These are supported by Planning Guidance SPD Key Principles AQ1 to AQ5.

Planning Assessment

- 314. The site is located within the borough-wide Air Quality Management Area (AQMA) for two pollutants – Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). An Air Quality Assessment and an Air Quality Positive Statement were provided with the application as required by the London Plan. The Air Quality Positive statement demonstrates that the scheme exceeds minimum requirements, incorporating green infrastructure and supporting active travel in line with GLA guidance for major developments.
- 315. As the works would include the demolition of existing buildings and the redevelopment of the new buildings the reports have assessed the air quality impacts of physical demolition and construction works and outlined mitigation measures. Mitigation for these impacts is addressed and secured through a condition for an Air Quality Dust Management Plan detailing measures to reduce dust as well as controls on the emissions standards of Non-Road Mobile Machinery (NRMM).
- 316. In terms of the operation of the new development, and the contribution to air quality, the proposed energy strategy is all-electric with no combustion technologies on site apart from the secondary/emergency generator required for sprinklers, evacuation lifts, and smoke fans. Space heating and hot water would be supplied via all-electric sources. As no combustion sources are proposed for the primary energy supply, no local air quality impacts are expected.
- 317. The new vehicular traffic generated by the development, as identified by the transport consultant, has been screened against the criteria set out in the Environmental Protection United Kingdom (EPUK) and Institute of Air Quality Management (IAQM) planning guidance to determine the need for a detailed assessment. This screening showed that the potential impact of additional road traffic on local air quality is considered insignificant, and a detailed assessment is not required.
- 318. In terms of the sensitivity of new occupants/ users to poor air quality, the Air Quality Assessment identifies that there is no likely exceedance of the annual

mean UK Government Air Quality Objectives (AQOs) for NO₂, PM₁₀ and PM_{2.5} and the 1-hour mean NO₂, and 24-hour mean PM₁₀ AQOs and WHO guidelines. Additionally, compliance with the PM_{2.5} 2040 interim target is also expected. As such no additional mitigation is required to be embedded into the design and natural ventilation (i.e., from opening windows) is possible at the application site. In any event, the proposed development utilises mechanical ventilation with heat recovery (MVHR) with air intakes located on each floor at the facades. To ensure noise constraints and air quality are reconciled, a condition is attached requiring a detailed ventilation strategy.

319. In summary, the submitted Air Quality Assessment shows that the proposed development would be Air Quality Neutral, in accordance with Policy SI1 of the London Plan 2021 and Policy CC10 of the Local Plan 2018.

Equalities considerations

320. An Equality Statement was submitted with the application to assist the decision maker in discharging their Public Sector Equality Duty when considering the proposals. GLA Officers are satisfied that the assessment is thorough and robust.
321. The finished development is not expected to have any adverse impacts on anybody due to their protected characteristics. Disruption, environmental nuisance, and route diversions during demolition and construction would likely have some adverse impacts on people due to their age; disability; or pregnancy and maternity. The mitigation measures outlined by the applicant, namely a Demolition and Construction Management Plan, would address these impacts as far as possible and is recommended to be secured by condition.
322. During the GLA's assessment of the application, the Council raised that Cambridge School, which is adjacent to the application site, currently benefits from a facilities-sharing agreement with Phoenix Academy which has been existence for around three years. This includes space within the Vibe building and the Technology block, both of which are to be retained and refurbished under the planning application proposals. Future Academies retains the contractual ability to recover the accommodation at any time with notice, regardless of whether planning permission is granted. Future Academies states that existing 12-month Licence already includes provision for the Technology Block and the Vibe building to revert to Future Academies upon completion of the development, meaning the Council has prior awareness of the Academy's plans in this regard.
323. GLA Officers have had regard to this matter, including the fact that elements of the SEND provision at Cambridge School is liable to be impacted by the spaces' reversion to the owner's use. However, given this could occur without the planning application coming forward (whether in a 'do nothing' scenario, or through refurbishment of the Vibe building and Technology block in isolation) Officers do not consider that creating an obligation for continued provision or a financial contribution to alternative facilities for Cambridge School is necessary to make the development acceptable in Planning terms, and would not meet the Regulation 122 tests.

Environmental Impact Assessment

324. The planning application represents Environmental Impact Assessment (EIA) development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and is accompanied by an Environmental Impact Assessment. The findings of the EIA are reported in an Environmental Statement (ES) and Appendices which has been prepared to accompany the planning application.
325. The 'environmental information' has been examined by the Council and has been taken into consideration by Officers to reach a reasoned conclusion on the significant effects of the proposal, which forms the basis of the assessment presented in this report and GLA Officers concur that the information is robust.
326. Mitigation and monitoring measures as proposed in the ES are recommended to be secured through planning conditions and/or planning obligations. The environmental information that has been taken into account comprises the ES, ES Appendices and any further/ other information, any representations made by consultation bodies, and by any other person about the environmental effects of the proposal.
327. The ES has been reviewed in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

Draft London Plan

328. The public consultation on the draft London Plan opened on 16 July 2026 and closes on 15 October 2026. Given its early stage of preparation, the draft London Plan is afforded very limited weight as a material consideration in the assessment of this planning application. The section below outlines the areas where there is a significant change in policy approaches relevant to this development, with a brief discussion of whether the development would comply with the draft planning policies.

Tall buildings

329. Draft London Plan Policy MBUL3 sets out that tall buildings should be directed to locations identified in the Local Plan. If a tall building is proposed outside of a location identified in a Local Plan or in Table 2.2, the criteria in Box MBUL3A should be applied when determining if the location is acceptable in height terms. Having regard to the characteristics of the site which include its proximity to an opportunity area, existing and emerging mid-rise townscape character to the north and east, and acceptable impacts on neighbouring amenity, the proposed building heights are acceptable in principle.

Optimising site capacity

330. The draft London Plan introduces an 'optimisation framework' which sets out minimum densities which should be provided on residential proposals, tied to SAM scores and broad character areas. The intention is to establish a baseline of potentially appropriate minimum densities, but a site-by-site approach to design response will still need to be taken.

331. Draft Policy and Box MBUL2 states that in the first instance, site optimisation for particular locations and sites is defined by the parameters set out in the following:
- a. Design codes, masterplans and site allocations with design parameters prepared by LPAs in accordance with the approach of this Plan. This includes the London Small Site Design Code (or as refined by LPA in local design codes and pattern books).
 - b. Opportunity Area Planning Frameworks (OAPFs) where they contain relevant density, height or other capacity guidance.
 - c. Local plan defined locations and policies for building of 30m and above in height (see MBUL3 Tall buildings).
 - d. Policy PV7 for sites in the Green Belt
332. None of the circumstances in A-D above would apply and so the Optimisation Framework in draft Box MBUL2 would apply for sites over 0.25ha and with a Sustainable Access Measure SAM2 and above. The application site has a SAM of Part-4, Part-5 and falls under Context Setting A. As such, the density range in the Optimisation Framework is 3-7 storeys and 440-750 habitable rooms/ hectare. It may be acceptable to exceed the heights and densities expressed in the table. As explained in this report, the proposed building heights are considered to be acceptable, and the site is considered to be suitably optimised, in accordance with the aims of Policy MBUL2.

Energy use and carbon

333. It is noted that the draft London Plan has set out proposed future changes to the methodology and metrics for the assessment of energy and carbon performance for new developments. These are set out in draft policies GHR1, GHR2 and GHR3. For the time being, however, and until further updates are provided, the GLA expects all applications to continue to follow the approach set out in the adopted London Plan and 2022 Energy Assessment Guidance. The GLA will review the approach, as national policy and approved modelling methodologies become available.

Accessible housing

334. Draft Policy HN9 Accessible Housing states that developments must now provide at least 10% M4(3)(2)(b) Wheelchair-accessible dwellings, 10% M4(3)(2)(a) Wheelchair adaptable dwellings, and all other homes to meet M4(2). Developments must also apply M4(3) wheelchair user dwelling standard to all approach routes, including vertical circulation. This goes beyond the requirements of current London Plan Policy D7, and the proposal has not been designed in this way.

Affordable Housing/ Fast Track Route

335. The proposal is to deliver 37% affordable housing by habitable room, all of which would be Social Rent. The offer would still be eligible for the Fast Track Route under draft London Plan Policy HN3, which sets 'bands' with different thresholds

depending on borough location or a London-wide threshold of 40% affordable housing on Public Land (compared to 50% under the current London Plan).

336. In summary, conflict is identified with draft London Plan Policy HN9, which requires at least 20% of new dwellings to be either wheelchair accessible or wheelchair adaptable. The development complies with current London Plan Policy D7 in that 10% of units are designed to be wheelchair adaptable.

Draft Hammersmith and Fulham Local Plan

337. The draft Hammersmith and Fulham Local Plan Regulation 18 version was subject to public consultation at the end of 2025. The Regulation 19 version has not yet been published. The policies contained within the draft Local Plan are also afforded very limited weight as a material consideration given its early stage of preparation. The section below outlines the areas where there is a significant change in policy approach relevant to this development, with a brief discussion of whether the development would comply with the draft Local Plan.

Affordable Housing

338. Draft Policy HO3 introduces reference to the London Plan's Threshold Approach, and states that affordable housing provision that meets the relevant Fast Track threshold will be considered the maximum amount viable with no further site-specific viability testing required.
339. The draft Local Plan also introduces an updated tenure split for affordable housing, weighted even further towards Social Rent (70% Social Rent/ 30% Intermediate). The supporting text acknowledges a need over the Local Plan period for 17,200 social rented dwellings and a need for 5,300 intermediate tenure dwellings, including those for shared ownership and intermediate rented tenures".

Tall Buildings

340. Draft Local Plan Policy DH2 on Tall Buildings states that tall buildings may be appropriate within regeneration areas provided the proposals also meet Criteria a)-l) setting out good Design principles. It is noted that the draft Policies Map accompanying the Regulation 18 version of the Local Plan extends the White City Regeneration Area to specifically include the application site. GLA Officers interpret this to mean that the site is identified in the draft Local Plan as being suitable for tall buildings, subject to meeting the good design criteria contained within draft Policy DH2. Under the new direction of travel, therefore, there would be no conflict with the plan-led locational requirements of the adopted London Plan or the draft Local Plan policy on tall buildings.

341. In summary, no conflicts are identified with draft Local Plan policy.

Mitigating the impact of the development through planning obligations

342. Regulation 122 of the Community Infrastructure Levy Regulations 2010 as amended in 2019 states that a section 106 planning obligation may only constitute a reason for granting planning permission for the development if the obligation is

necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. These are statutory tests.

343. The NPPF states that “Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.”
344. Hammersmith and Fulham Council’s Planning Guidance SPD (2018) provides further guidance on how the Council will secure planning obligations, where these are necessary to mitigate the impacts of development.
345. Pursuant to the consideration within the previous sections of this report, and in line with the policy context set out above, GLA officers propose to secure several planning obligations, which are required to appropriately mitigate the impact of this development as highlighted above. GLA officers are content that the obligations in the Section 106 agreement meet the tests in Regulation 122 of the CIL Regulations 2010 (as amended) as they either will not be spent on “infrastructure” as defined in the regulations or will be sufficiently narrowly described in the section 106 agreement.

Legal considerations

346. Under the arrangements set out in Article 7 of the 2008 Order and the powers conferred by Section 2A of the Town and Country Planning Act 1990 the Mayor, acting under delegated authority, is the Local Planning Authority for the purposes of determining this planning application ref: 2025/02541/FUL.
347. Section 35 of the Greater London Authority Act 2007 inserts section 2F into the Town and Country Planning Act 1990 which includes a requirement that for applications the Mayor takes over, the Mayor must give the applicant and the borough the opportunity to make oral representations at a hearing. He is also required to publish a document setting out:
- Who else may make oral representations;
 - The procedures to be followed at the hearing; and,
 - Arrangements for identifying information, which must be agreed by persons making representations.
348. The details of the above are set out in the Mayor’s Procedure for Representation Hearings which reflects, as far as is practicable, current best practice for speaking at planning committee amongst borough councils.
349. In carrying out his duties in relation to the determination of this application, the Mayor must have regard to a number of statutory provisions. Listed below are some of the most important provisions for this application.

350. Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that in dealing with such an application the authority shall have regard to:
- The provisions of the development plan, so far as material to the application;
 - Any local finance considerations, so far as material to the application; and
 - Any other material consideration.
351. Section 70(4) defines “local finance consideration” as:
- a) A grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown; or
 - b) Sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy.
352. Furthermore, in determining any planning application and connected application, the Mayor is required by section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine the application in accordance with the Development Plan (i.e. the London Plan and the adopted Local Plan) unless material considerations indicate otherwise.
353. Other guidance, which has been formally adopted by Hammersmith and Fulham Council and the GLA (e.g. Supplementary Planning Documents and Supplementary Planning Guidance), will also be material considerations of some weight (where relevant). Those that are relevant to this application are detailed in this Representation Hearing report.
354. GLA officers are satisfied that the current report to the Deputy Mayor has had regard to the relevant provisions of the Development Plan. The proposed Section 106 package has been set out and complies with the relevant statutory tests, adequately mitigates the impact of the development and provides necessary infrastructure improvements.
355. As regards to the Community Infrastructure Levy (CIL) considerations, Mayoral CIL payments and Hammersmith and Fulham CIL payments are expected to be made in association with this development.
356. In accordance with his statutory duty in section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 the Mayor shall have special regard to the desirability of preserving Listed Buildings, their settings and any features of special architectural or historic interest which they possess. The Mayor is also required to give special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas which may be affected by the proposed development (section 72 of the of the Planning [Listed Buildings and Conservation Areas] Act 1990). To the extent that these duties are engaged, these matters have been addressed within earlier sections of the report.
357. Where the Mayor takes over an application, he becomes responsible for the section 106 legal agreement, although he is required to consult the relevant borough(s). In this instance, there have been a series of lawyer led meetings to

discuss the section 106 content, and it has progressed on a number of key issues. Both the Mayor and the borough are given powers to enforce planning obligations.

358. When determining these planning applications, the Mayor is under a duty to take account of the provisions of the Human Rights Act 1998 as they relate to the development proposal and the conflicting interests of the applicants and any third party affected by, or opposing, the application, in reaching his decision. Planning decisions on the use of land can only be taken in line with the Town and Country Planning Acts and decided in accordance with the development plan unless material considerations indicate otherwise.
359. The key Articles to be aware of include the following:
- a) Article 6 - Right to a fair trial: In the determination of his civil rights and obligations... everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.
 - b) Article 8 - Right to respect for private and family life: Everyone has the right to respect for his private and family life, his home and his correspondence.
 - c) Article 1 of the First Protocol - Protection of property: Every person is entitled to the peaceful enjoyment of his possessions.
360. It should be noted, however, that most Convention rights are not absolute and set out circumstances when an interference with a person's rights is permitted i.e. necessary to do so to give effect to the Town and Country Planning Acts and in the interests of such matters as public safety, national economic well-being and protection of health, amenity of the community etc. In this case this Representation Hearing report sets out how this application accords with the Development Plan.
361. Regulation 122 of the Community Infrastructure Levy Regulations 2010 states that a Section 106 planning obligation may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. These are now statutory tests.
362. The Equality Act 2010 provides that in exercising its functions (which includes the functions exercised by the Mayor as Local Planning Authority), that the Mayor as a public authority shall amongst other duties have due regard to the need to a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act; b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
363. The protected characteristics set out in the Equality Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Equality Act acknowledges that compliance with the duties set out

may involve treating some persons more favourably than others, but that this does not permit conduct that would otherwise be prohibited under the Act.

364. GLA officers are satisfied that the application material and officers' assessment has taken into account the equality and human rights issues referred to above. Particular matters of consideration have included provision of affordable housing, accessible housing, provision of educational facilities, and the protection of neighbouring residential amenity during construction and operational phases.
365. The Environmental Statement and wider environmental information submitted with the application and contained within representations from consultation bodies has been taken into account in the assessment of this application.

Conclusion and Planning Balance

366. As detailed above Section 38(6) of the Planning and Compensation Act 2004 requires matters to be determined in accordance with the development plan unless material considerations indicate otherwise.
367. When assessing the planning application, the Deputy Mayor is required to give full consideration to the provisions of the development plan and all other material considerations.
368. The principle of the development and optimising brownfield land for new homes and enhanced school facilities is supported by national, London-wide and local planning policy. The net loss of open space on the site is robustly justified against the requirements of the NPPF and the development plan.
369. The new development provides a good standard of residential accommodation and represents high-quality urban design, architecture, and landscaping, and the impacts of the tall buildings have been fully assessed and found to be acceptable overall. On balance, the impact on the amenity of neighbours is found to be acceptable.
370. The highways and transportation impacts of the development are acceptable, subject to financial contributions towards Step Free Access and other active travel improvements.
371. The environmental impacts of the development, including carbon emissions, air quality, flood risk, biodiversity, and land contamination have also been assessed and found to be acceptable.
372. Partial policy conflicts with the development plan are identified in relation to:
- London Plan Policy D9 locational requirements – the site is not within an area identified as being suitable for tall buildings in the Local Plan, but a detailed assessment concludes that the tall building effects are otherwise acceptable. This is not a full policy conflict, as Policy D9 allows tall buildings outside identified areas if their effects are assessed as acceptable.

- London Plan Policy HC1 states that development proposals should avoid harm; given that less than substantial harm to heritage assets is identified (at the low to middle end of the range) then conflict is identified with Policy HC1.

373. Notwithstanding the above, overall, the proposed development is considered to accord with the development plan, when read as a whole. In accordance with Policy S4 of the NPPF (2026), the development should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies of the NPPF. This is not the case here.

374. Officers have also considered the draft policies contained within the draft London Plan and the draft Local Plan, both of which are at an early stage. Conflict is found with draft London Plan Policy HN9, and no conflict is found with the draft Local Plan. Some of the policies within the draft Local Plan lend stronger support to the proposal than adopted policies. Nevertheless, these policies are afforded very little weight in the assessment of this application.

375. Harm (of a lesser degree than substantial harm) has been identified to the Old Oak and Wormholt Conservation Area at the low to middle end of the scale. The identification of harm to a designated heritage asset gives rise to the need to weigh the harm against the public benefits of the scheme (NPPF Policy HE6 part 4). The proposed development would give rise to the following public benefits which have been secured by either planning obligation or planning condition:

- New and enhanced secondary school and Sixth form facilities for an Ofsted 'Outstanding' community school;
- 90 new Social Rent homes;
- Public realm activation and enhancements on The Curve in front of the new development; and
- Financial contributions including £34,000 towards Step Free Access enhancements at White City station and a further £150,000 towards improvements to walking and cycling infrastructure near the site.

376. The public benefits listed above are considered to clearly and convincingly outweigh the heritage harm identified, in accordance with NPPF Policy HE6.

Recommendation to the Deputy Mayor – grant planning permission subject to conditions and a Section 106 agreement

377. Subject to conditions, the proposed development accords with relevant development plan policies, including NPPF Policies S3, S4, HC7, CF1, and CF2; London Plan Policies GG2, GG4, H1, G1, S5, H1, H6, H10, D6, S4, SI4, D3, D4, D6, D8, D9 (Part C), HC1, D12, D14, T1-T7, G5, SD1, SI12, SI1, SI2 and Local Plan Policies HO1, HO2, OS2, HO3, HO5, HO11, OS3, DC1, DC2, DC3, CS1, DM7, CC11, CC13, T1-T7, OS1, CC9, CC3, CC1, CC10.

378. Partial policy conflict is identified with the tall building location criteria of London Plan Policy D9 Part B, but the impacts of the tall building are nevertheless judged to be acceptable. Conflict is also identified with London Plan Policy HC1, but the heritage harm identified is clearly and convincingly outweigh the heritage harm identified, in accordance with NPPF Policy HE6.
379. This report has considered the material planning issues associated with the proposed development in conjunction with all relevant national, regional and local planning policy, and has found that the proposed development is acceptable. Accordingly, it is Officers' recommendation that planning permission should be granted, subject to the obligations set out under the S106 legal agreement and conditions.
380. NB. The Deputy Mayor's decision on this case, and the reasons for it, will be made available on the GLA's website www.london.gov.uk.

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