

Recreational Land, Gresham Road, SEND School

in the London Borough of Hounslow

planning application no.00519/D/P5

Strategic planning application stage 1 referral

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

The proposal

A new Special Educational Need and Disability (SEND) School for the expansion of the existing Oaklands School onto a new site. A two-storey building with 30 classrooms for 224 students aged 11 to 25, with specialist teaching rooms and sports facilities for shared community use.

The applicant

The applicant is **London Borough of Hounslow** and the architect is **Pick Everard**.

Strategic issues

Provision of education, open space, community use, urban design, inclusive access, sustainable development, flooding and transport are the key strategic issues relevant to this application.

Recommendation

That Hounslow Council be advised that the application does not fully comply with the London Plan, for the reasons set out in paragraph 67 of this report; but that the possible remedies set out in that paragraph of the report could address these deficiencies. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

Context

1 On 10 February 2016 the Mayor of London received documents from Hounslow Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 22 March 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3E of the Schedule to the Order 2008: *"Development - (a) which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and (b) comprises or includes the provision of more than 2,500 square metres of floor space for a use falling within any of the following classes in the Use Classes Order—(ix) class D1 (non-residential institutions)."*

3 Once Hounslow Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal or allow the Council to determine it itself, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The application site is an open space and has an area of 1.8ha located within the London Borough of Hounslow located at Gresham Road. It is designated as Local Open Space in the newly adopted (September 2015) Local Plan.

6 To the north of the site adjacent to Great West Road, different buildings which are used for sports clubs and recreations are located. Residential properties surround the site to the south and the west. There is a right of way along the east boundary of the Hounslow Conservative Club (HCC) land crossing the application site towards the east, adjacent to the London Underground land (Piccadilly Line) up to the A4. This part of the site is very steep and has overgrown grass.

7 Public access is limited to the hours of daylight only, by means of a legal agreement between HCC and the London Borough of Hounslow. There is a former play ground which had the swings and other equipment removed and so is no longer in use. Currently, no specific sport and recreation activities take place on the existing recreational land.



Aerial view of the application site: Source – applicant's design and access statement.

8 The nearest London Underground station is Osterley, located approximately 260m north-east of the site. The station is served by the Piccadilly Line, providing a frequent service into central London. The nearest section of the Transport for London Road Network, A4 Great West Road, is located approximately 10m from the site access. The nearest section of the Strategic Road Network, A315 London Road, is located approximately 870m to the south-east. The site is served by four different bus routes (located on Gresham Road, Spring Grove Road and Great West Road). These buses operate at an average frequency of 4 buses per hour. As a result, the site currently records a public transport access level (PTAL) of 2 classified as low, on a scale of 1-6 where 1a is the lowest and 6b the highest.

Details of the proposal

9 The proposal details comprise a new 3-form entry SEND Secondary School alongside a 19 to 25 aged SEND College component, all housed within a single building (8,215sqm). The total number of pupils will be 224 in 30 classrooms with associated specialist teaching, group and therapy spaces. The School will provide sports facilities that will be available for community use outside normal school hours.

Case history

10 The site and adjoining land to the south was a recreation ground originally owned by London Regional Transport (LRT), and was transferred to Wimpey in 1997 following a planning appeal permitting residential development on the adjoining land (now Gladstone Gardens, Palmerston Road, Chamberlain Gardens and Baldwin Gardens). Currently, the application site is a freehold and within the ownership of the Council. A planning obligation was entered into on 1st July 1997 whereby Wimpey agreed to transfer the site to the Council for the purpose of a public open space, the transfer taking place in 2001, following completion of the residential development.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Education *London Plan; Mayor's Social Infrastructure SPG;*
- Open space *London Plan;*
- Community use *London Plan;*
- Urban design *London Plan;*
- Access *London Plan; Accessible London: achieving an inclusive environment;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy;*
- Flooding *London Plan;*
- Transport *London Plan; the Mayor's Transport Strategy;*

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plans in force for the area are the 2015 Hounslow Local Plan and the London Plan (Consolidated with Alterations since 2011).

13 The following are also relevant material considerations:

- The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance.
- The Mayor's Social Infrastructure SPG (2015).

Land use principles; provision of education facility on open space

14 In relation to the provision of educational facilities, policy 3.18 'Education facilities' of the London Plan states *"Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes"*.

15 The above policy states *'The Mayor will support provision of early years, primary and secondary school and further education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice, particularly in parts of London with poor educational performance. ...Development proposals which enhance education provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes.'*

16 The Mayor's Social Infrastructure SPG provides guidance on planning for social infrastructure provision at strategic level starting with the GLA's own demographic projections and the ways in which these can be used to understand need for health, education and sports facilities. It states *"Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to educational purposes. Those which address the current and projected shortage of primary school places and the projected shortage of secondary school places will be particularly encouraged. Proposals which result in the net loss of education*

facilities should be resisted, unless it can be demonstrated that there is no ongoing or future demand.”

17 Para 72 of the NPPF states ‘*The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement and to development that will widen the choice of education. They should give great weight to the need to create, expand or alter schools.*’

18 Policy 7.18 of the London Plan in regard to protecting open space states ‘*The loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate.*’

19 The application site is identified as a locally protected open space. The applicant has set out the following cases to justify the partial loss of open space for the proposed school development:

20 The Need for a new SEND School: The applicant’s planning statement states ‘The London Borough of Hounslow, is experiencing a substantial rise in birth rates, and in common with other boroughs across London and the rest of the country, is also experiencing an increase in the number of children with Special Educational Needs and Disability (SEND). ...Over the last 4 years there has been a 21% increase in the number of students with a SEND statement placed in a Hounslow Special School or SEND centre, and an overall increase of 34% (229 pupils) in specialist provision. By 2020 it is projected that there will be a need for 98 additional primary special school places, 196 secondary special places and 90 post-16 special school places. The LA has initially responded to the current increase in demand for SEND places across the borough by expanding provision at four mainstream primary schools with specialist SEND provision (commencing Sept 2015). In order to meet the ongoing projected demand, the LA is proposing to increase capacity at Marjory Kinnon School in Bedfont and Oaklands School, Isleworth.’

21 Selecting the site for development: The planning statement states ‘Sequential assessment has been carried out by London Borough of Hounslow to assess the potential of sites across the Borough to meet the growing demand for school places, including special school (SEND) places. An original 594 possible sites were identified and ‘sieved’ through a series of assessment procedures. These are described in the Cundall report and appendices that are available online. The Gresham Road site performed well in the latest Cundall update (2014) but was initially discounted on the basis of ‘legal issues’. These relate to the ‘land locked’ nature of the site, where the Hounslow Conservative Club (HCC) owns the land across which access will be required. HCC have expressed its support for the development proposals and negotiations have proceeded to agree the arrangements for access. This has confirmed that the school could best increase capacity by means of a new development on this site. A remodelled access route is proposed for the Gresham Road site, in consultation with and for shared use with other site users. The majority of pupils will be transported by minibus to and from the site.’

GLA officers assessment on land use principles:

22 It is clear that a thorough and robust exercise has been carried out to investigate potential sites. However, GLA officers are not in a position to comment on the detailed assessment of each and every site or whether or not all potential sites have been considered. However, the fact that the analysis has taken into consideration the Council’s ‘Sequential Site Assessment of Potential School Sites Update 2014’ published in January 2014, and that this site has been identified as a site for provision of a new SEND school in the Council’s Local Plan Part 1 Spatial Strategy adds strength and robustness of the process.

23 In conclusion, GLA officers accept the above cases set out by the applicant in particular the compelling local educational need (for SEND) and lack of alternative sites which have demonstrated that the proposed development on open space is justified. In addition, although there is a partial loss of open space in quantitative terms, the qualitative improvement to the remaining open space in the

provision of a variety of sport facilities both for the proposed SEND School and the communities in the area outweighs the quantitative loss. The scheme accords with the London Plan (3.18E) which states "Development proposals which maximise the extended or multiple use of educational facilities for community or recreational use should be encouraged."

24 Furthermore, the design and layout of the school development minimises as much as possible, the visual impact of the development on the openness of the site (see design comments below).

25 In summary, the current proposals will allow the Council to meet its statutory duty to provide the much needed SEND places in the Borough whilst offering a range of new high quality sports and other facilities for shared community use (see the details below). Therefore, the proposed school development on site is supported.

Community use and recreational grounds

26 The London Plan (3.18E) expects community use to be maximised in such educational developments. The applicant has submitted a draft of statement of Community Use which incorporates the results of extensive community consultation.

27 The draft statement states that the development proposals will mean that the existing large, but low quality open space at Gresham Road will be partially lost, but the proposals will address the requirements of provision of recreational grounds in a number of ways. Alternative high quality sports and recreational facilities, both internal and external, will be provided for community use outside normal school hours (with pre-booking and some fee payments), at evenings and weekends.

- The total area of shared use internal space will be approximately 1,575sqm.
- Specific shared external sports facilities will be approximately 2,500sqm.

28 Internal shared facilities:

- 2 court Sports Hall and gymnasium,
- Hydrotherapy and warm water pool,
- High quality changing rooms,
- Dining hall – hired out for classes and cafe,

29 External shared facilities:

- All-weather Games area (5-a-side football and basketball), and
- All-weather running and sprint tracks.

30 In addition, the planning statement sets out that the entrance plaza will be designed as a potential recreational space (a further 1,500sqm) for use outside normal school hours, and will be available when the other sports facilities are open at evenings and weekends. There are further specialist teaching spaces at first floor with the potential for community use – art, food technology, library and music spaces. These have been arranged to allow a supervised community access whilst restricting access to the secure SEND teaching areas. They will be considered for further community sharing when a successful operational system has been established for the original facilities. These facilities generally are intended for non-school pre-booked community use. The school is in the early stages of considering its written policy for this, the details of which will be developed over the coming months.

31 The applicant has stated that although the application site falls outside the statutory definition of 'playing field' it has been in discussion with Sport England and it is noted that Sport England has acknowledged that the land is defined as Local Open Space and that it is not within Sport England's merit. That said, the letter dated 07 May 2014 from Sport England stated, "It is considered that the proposal has the potential partly, if not wholly, to fulfil the circumstances described in exception E5. This being the case, it is unlikely that Sport England would raise an objection to the proposal."

32 As a result, the applicant's incorporation of a draft statement of community use is welcomed. As the applicant acknowledged, whilst there would be a quantitative loss of recreational grounds, this has to be viewed pragmatically in a sense that the qualitative improvements to the grounds with the inclusion of the all-weather pitch, the swimming pools and the above list of facilities available for community use, offering the potential for more intensive usage. Therefore, on balance, the proposed development is supported. The Community Use Plan should be secured by condition.

Urban design

33 Good design is central to all objectives of the London Plan (2015) and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London.

34 The applicant has submitted a design and access statement. The broad layout principles are supported from a strategic design perspective and the access strategy prioritises pedestrians over vehicles while also ensuring that the school block is orientated to provide a sense of arrival for staff, students and visitors. The primary access routes will relate to movement routes within the campus, ensuring safe and fully inclusive links between school facilities. The landscaping strategy illustrates how campus facilities are integrated into the existing landscape, with the aim of safeguarding the existing open quality of the site. Boundary treatments are also carefully considered to provide security while also enabling views into the site, avoiding large expanses of blank and inactive frontage.



Source: applicant's design and access statement – artists impression of external visualisation.

35 As shown above, the applicant has submitted visual assessments that demonstrate the visual impact the massing and appearance of the school block will have on the open quality of the site is marginal. The applicant is encouraged to explore the use of higher quality facing materials to the main school frontage. As a minimum requirement, the Council should secure key details of the cladding system to ensure the best possible build quality is delivered and ease of maintenance is prioritised.

Inclusive design

36 The applicant has submitted a design and access statement. The Statement only states 'All aspects of the building have been designed for use by all persons whether able bodied or disabled or with special educational needs. The only exception to this would be limited access for maintenance to the roof and restricted service areas.'

37 The applicant needs to demonstrate in detail with supporting plans and drawings how the proposed development complies with inclusive design policy 7.2 of the London Plan, Accessible

London SPG and Building Bulletin 102 and 104. Given the potential users (SEND) of the school, the statement should demonstrate briefly how inclusiveness has been incorporated into all elements of the proposed school; how the design has been developed to provide level access and how the areas have been designed to meet the latest Building Regulations - Part 'M', the Equality Act 2010 & BS 8300; therefore the following key points should be incorporated into the design of the school:

- Main entrances to provide a minimum of 1000mm clear opening at the doorway via a level threshold and graded approach shallower than 1 in 20 to avoid the need for handrails.
- All appropriate doors to be wheelchair accessible. Dimensions of spaces to include minimum manoeuvrability requirements for wheelchair users. Doors to have a door closer of a type that requires a maximum opening force of 30N at the leading edge. Doors to have vision panels which provide visibility from 500mm to 1500mm above the floor levels and including operating furniture that is easily reached and which provides a secure grip.
- New signage planned and designed to current best practice with reference to the Sign Design Guide (2000) and DRC (2004) 'Good Signs'. Lighting and colour and finishes schemes that follow 'best practice' with particular reference to the needs to those with visual impairment. Colour contrast in new areas to be 30 LRV point difference between the new key elements where appropriate, i.e. floors, doors, walls and handrails.
- The car parking that incorporates designated accessible parking spaces (at least 5% of the total parking spaces), should be properly lit, and have appropriate markings. All disabled bays across the scheme should be located in front of the main building entrances.
- Part P – Electrical Safety.

38 The applicant needs to clarify the type of lifts proposed, usually passenger lifts are preferable than platform lifts, but if the latter is chosen justifications should be provided accompanied by details of specifications and management plan. It should be ensured that the lifts are a suitable size to accommodate a variety of potential users i.e. a lift with minimum dimensions may not be suitable in this situation; therefore, details of the specifications are vital.

39 The above inclusive measures should be incorporated into the design of the school and should be secured.

40 As a result, there is no sufficient evidence that demonstrates the proposals fully comply with policy 7.2 of the London Plan.

Sustainable development/energy

Energy efficiency standards

41 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. The demand for cooling will be minimised through solar control glazing. The applicant should provide evidence of how policy 5.9 of the London Plan has been addressed to avoid overheating and minimise cooling demand. Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 is recommended.

42 The applicant should provide the carbon emission figure in tonnes per annum for each stage of the energy hierarchy. See Table 1 and Table 2 in the latest GLA assessment guidance for the required format: <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>. The BRUKL sheet including efficiency measures alone (i.e. before CHP) should be provided to support the savings claimed.

District heating

43 The applicant has confirmed that there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available. This is welcomed.

44 The applicant is proposing to install a site heat network. However, the applicant should confirm that all building uses will be connected to the site heat network. It is noted that the site heat network will be supplied from a single energy centre. Further information on the floor area and location of the energy centre should be provided.

Combined Heat and Power (CHP)

45 It is proposed to install a 90 kW_{th} gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating. The applicant should provide the carbon emission figure in tonnes per annum for the 'be clean' stage of the energy hierarchy.

46 The applicant should provide further information on the CHP sizing, including thermal store size and suitable monthly demand profiles for heating, cooling and electrical loads. The applicant should also provide information on the management arrangements proposed for the system, including anticipated costs, given that the management and operation of small CHP systems can significantly impact their long term financial viability.

Renewable energy technologies

47 It is proposed to install 850sqm roof mounted Photovoltaic Panels. A roof layout drawing showing the location of the proposed PV array should be provided.

Overall Carbons Savings

48 The total site wide carbon emission savings in tonnes per annum has not been provided in the energy statement. However, based on the energy assessment submitted, the applicant is expecting to meet the 35% reduction requirement from Part L 2013 of Policy 5.2 of the London Plan. The comments above should be addressed before compliance with London Plan energy policy can be verified.

Flooding

49 Flood Risk: The Flood Risk Assessment confirms that the site is located in Flood Zone 1 and that one small part of the site (south of Osterley Judo Club) is at high risk of surface water flooding. The FRA also confirms that a section of the Great West Road immediately north of the site is a local low point with flooding potential. The development proposals are compliant with London Plan policy 5.12 (flood risk).

50 Drainage: Due to the surface water flood risk on and near the site (Great West Road), the application of London plan policy 5.13 (sustainable drainage) will be particularly important. The Drainage Additional Information report states that the current greenfield land use of the site could become approximately 75% impermeable hardstanding. The FRA proposes limiting the discharge rate to 5l/s.

51 The Drainage Statement proposes two separate drainage systems for the eastern and western parts of the site.

52 The eastern part of the site (including the school buildings) will be served by a geocellular attenuation tank underneath the car park in the western part of the site. This will store stormwater from the 1 in 30 year event. It also proposes storage of excess runoff from the eastern part of the site (up to the 1 in 100 year event) on the car park surface (Design for Exceedance) without flooding of the school building.

53 The western part of the site (including the car park) will rely on infiltration. Channels and gullies will carry run-off from impermeable paved areas to paved areas with Sudsagg as the sub-base. A further area will include permeable paving with a Sudsagg sub-base.

54 The use of infiltration is welcomed and should be secured. There is an indication in the Design and Access Statement External Finishes Schedule that there may be a green roof – this should be confirmed and secured. That said as 'green' sustainable drainage measures can play a

dual role as an educational resource, therefore some form of 'green' SuDS is recommended to be included as part of the drainage system.

Transport for London's comments

55 The main vehicular access to the school site is off Gresham Road, which is shared with the Hounslow Conservative Club, located to the north, and a car park also owned by the Club to the west of the site. There is a barrier system in place at where the access road joins the school site entrance. This first barrier for the Gresham Road site will allow access for the minibuses, and for parents to pick up and drop off pupils, along with staff and visitor parking. The majority of the pupils (75%) will travel to the site in one of the 28 dedicated minibuses. To minimise the traffic impact, the minibuses are to arrive and depart in two waves, to coincide with a proposed staggered start and finish times for upper school and lower school. For safeguarding purposes, 14 minibuses will access the internal secured compound of the site where pick up/ drop off will take place in one wave. On the arrival of the 14 minibuses within the site compound, the gate will close and at this point pupils will be allowed to alight, this arrangement is supported and should be secured via a travel plan/ site management plan.

56 Pedestrian access is also gained from Gresham Road, adjacent to the vehicular access. TfL understands that the school is negotiating with Hounslow Conservative Club (HCC) in order to come to an arrangement that will allow them to use the pedestrian access to the site due to its convenient location to Osterley Underground station. This is supported by TfL and the applicant should clarify whether a legally binding agreement has been reached with the HCC.

57 The proposal includes the relocation of all the 92 pupils and 83 staff from the existing Oaklands SEND School to the application site with further expansion. TfL therefore accepts that trip generation can be estimated based on the existing SEND school. It is anticipated that the proposed school (consisting of 224 pupils and 224 staff) will generate an additional 142 vehicular trips (59 by staff, 55 by parents and 28 by minibuses) in the AM peak hour and similar numbers in the afternoon school finishing time. TfL also agrees that arrival and departure patterns by vehicles will be more evenly spread than a regular school as a result of the staggered starting/ finish time. Whilst TfL considers that traffic capacity impact on A4 Great West Road would not be significant; for the sake of safety, TfL requests that entry treatment at the junction of A4/ Gresham Road be upgraded along with adequate warning signage on A4 Great West Road; this should be secured by condition or legal agreement.

58 Due to the Special Education Needs and Disability (SEND) nature of the school, TfL accepts that additional demand on local bus services is unlikely to be significant. TfL however requires a mechanism by condition/ legal agreement to allow TfL an opportunity to review the situation and secure appropriate contribution in line with London Plan policy 6.2, should the site be no longer used as SEND school in the future.

59 The proposal includes 41 staff car parking spaces, along with 27 parents' pick up/ drop off spaces. It is also envisaged that the parents' pick up/ drop off facilities may further be used for part-time staff parking outside the school run hours. Given the nature of the proposed school, TfL considers this proposed provision is acceptable. The proposal also includes electric vehicle charging points for four staff spaces, with a further ten spaces with passive provision. This meets the London Plan parking standards and is therefore welcomed. The applicant is however required to clarify the level of disabled / blue badge spaces, and ensure it complies or exceed the London Plan standards. TfL accepts the proposed provision of 14 mini-bus parking spaces.

60 To address the shortage of on-site staff parking for the 59 full time staff expected to travel in by car and prevent over-spilling onto the local street, the school intends to make arrangement with the neighbouring Hounslow Conservative Club (HCC) for school staff over-spill parking. This arrangement is accepted by TfL and should be secured by appropriate legal agreement. In addition, TfL requests that Hounslow Council to secure a condition to review on-site car parking provision if the school ceases to operate as a SEND school in the future. A car parking management plan

should be implemented to regulate the use of all the parking and pick up/ drop off facilities including minibus spaces.

61 The submitted draft school travel plan is welcomed; and TfL considers that the finalised plan should be secured by s106 agreement; and be accredited by the TfL School Travel Plan Accreditation Scheme (STAR) in line with London plan policy 6.3. The travel plan should include the proposed staggering of starting/ finishing of school which would reduce traffic impact on the TLRN and local highway network.

62 In line with London Plan policy 6.14, the submission of a framework delivery and servicing plan (DSP) and a construction logistics plan (CLP) should be conditioned by Hounslow Council.

63 The proposed development is for a school defined in the Education Act; therefore no Mayoral CIL will be applicable for this instance.

Local planning authority's position

64 Hounslow Council planning officers have yet to confirm their position.

Legal considerations

65 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

66 There are no financial considerations at this stage.

Conclusion

67 London Plan policies on principle of land use: provision of school on open space, community use, urban design, inclusive access, sustainable development/energy, flooding and transport are the key strategic issues relevant to this planning application. Whilst the application is broadly acceptable in strategic planning terms, on balance, the application does not fully comply with the London Plan. The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Principle of land use - provision of school on open space:** The proposed SEND secondary school on the site is supported as the scheme contributes through increasing provision of school places in areas where there is unmet demand. The sequential test exercise is suitably thorough and robust. On balance, the partial loss of the open space for the school use is accepted.
- **Recreational ground and community use:** The applicant's commitment to make available the new and improved sport facilities of the school for community use outside the school's core hour is welcomed. A detailed community use agreement should be secured.
- **Urban design:** There are no design concerns. However, the applicant is advised to explore the use of higher quality facing materials to the main school frontage. As a minimum requirement, the Council should secure key details of the cladding system to ensure the best possible build quality is delivered and ease of maintenance is prioritised.

- **Access:** There is no sufficient evidence that demonstrates the proposals fully comply with policy 7.2 of the London Plan.
- **Sustainable development/energy:** As it stands the application does not fully comply with energy policies of the London Plan. The comments above should be addressed before compliance with London Plan energy policies can be verified.
- **Flooding:** The development complies with London Plan policy 5.12 (flood risk), and sustainable drainage policy 5.13. All measures should be secured via appropriate planning conditions.
- **Transport:** Whilst most of the proposed transport measures are supported and should be conditioned, there remain concerns that need to be resolved as discussed above.

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