



Quod

Planning Statement

Rev A

Phoenix Academy,
White City

SEPTEMBER 2025

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1 Executive Summary

- 1.1 This Planning Statement has been prepared by Quod to provide a high-level overview of the forthcoming redevelopment of Phoenix Academy, The Curve, London, W12 0RQ (the “Site”) secured through a detailed planning application.
- 1.2 The redevelopment is being brought forward by Future Academies, the multi-academy trust which runs Phoenix Academy, and its chosen development partner, London Square.
- 1.3 The vision for the site is as follows:

The masterplan aims to create a harmonious and sustainable community where modern education, recreation and living coexist. The residential development will be the necessary catalyst for the transformation of the Phoenix Academy and its leisure facilities, ensuring brighter future for our pupils, local community, and residents.

Phoenix Academy is a school with big ambitions. Already in the top 2% of highest performing schools in the country, we want to be the very best: a school that reaches out and invites in.

We are well suited to help our pupils navigate their way from the classroom to the boardroom, already working in tandem with local partners like Imperial College, Blenheim Chalcot, Novartis and L'Oreal. Our proposed new buildings will provide our children, families and wider community with an outward-facing and forward-looking education facility capable of capitalising on the opportunities the local area has to offer.

- 1.4 Both Future Academies and London Square are committed to investing and improving the educational and social experience of pupils at Phoenix Academy. This will be achieved through upgrading the teaching and leisure facilities for pupils, through refurbishment and new build, alongside the delivery of desperately needed residential housing (market and affordable), private and communal amenity space, landscaping and play space.
- 1.5 The Government’s planning reforms have been revised to apply significant weight to proposals that enhance education infrastructure and housing on brownfield land and should be regarded as acceptable in principle¹.
- 1.6 The Department for Education (the ‘DfE’) has been engaged throughout, and with the Council remains a key stakeholder. This project is an exemplar example of how the Council, education provider and housebuilder can proactively work together to deliver mixed use development for significant public benefit.

The Proposed Masterplan

- 1.7 In consultation with the DfE, the Trust has written to all the public local education providers (primary, special and secondary schools) within the vicinity to inform them of the disposal of

¹ NPPF (December 2024): Chapter 11, Paragraph 125c)

the western land. Education providers were invited to confirm whether they required the land for educational purposes. Following this consultation, the Trust has established that there are no educational providers that require the land for educational purposes.

- 1.8 A full master planning team, including specialist education and residential architects, have been appointed to deliver the vision for the Site.
- 1.9 Future Academies have responded to the Council's advice and have entered in to contract with a credible development partner and house builder, London Square, who have already invested in the borough at Farm Lane and New Kings Road, and extensively across London. London Square deliver complex mixed-use sites in London.
- 1.10 The key strategic moves undertaken by the applicant are as follows:
- A more cost-effective school proposal has evolved, using retrofit over rebuild where possible, avoiding children being moved off during construction. To reduce the use of carbon, and to retain viable buildings, the scheme proposes to retain buildings which are less than 25 years old, including the Vibe.
 - Overall, the proposals reduce the extent of works to improve development economics excluding the Phoenix Fitness Centre and Janet Adegoke Swimming Pool; Cambridge School; and Phoenix Farm. Consultation with the Council previously found these properties to be less important to the overall redevelopment.
 - The new school infrastructure must be funded from residential development on site, the cost of which is currently estimated at over £40M. There is no other source of funding available.
 - This approach reflects the Council's own position for its "*Council Community School Programme*" which confirms that "*there is no external funding available to generate revenue on site to fund the school improvements*".
 - The Department for Education (the 'DfE') has been engaged throughout, and with the Council remains a key stakeholder. A formal section 77 application is being progressed in parallel with pre-application discussions. The Trust have previously undertaken two consultation exercises in 2020 and 2023.
 - The government's planning reforms apply significant weight to proposals that enhance education infrastructure and housing on brownfield land and should be regarded as acceptable in principle.
 - The government has doubled the minimum housing delivery requirement for the Council against current London Plan targets from 1,609dpa to 2,783dpa. Delivery has averaged 1,166dpa therefore a dramatic response from all parties is required.
 - above the minimum London Plan targets, but a new approach will be required, especially as the Local Plan is 7 years old, and the London Plan is nearing 5 years old. The new standard method is a material consideration.
 - The applicant understands the importance of affordable housing to the Council, and the strategic target of 50%.
 - The proposals will remove built form that detracts from the Old Oak and Wormholt Conservation Area and proposes buildings which will respect the special qualities of the area. There will however need to be a quantum of residential floorspace to fund the

school works and affordable housing. A balanced approach will therefore be required when considering the public benefits derived from the proposals and any heritage effects that might arise, in accordance with national policy.

- This project is an exemplar example of how the Council, education provider and housebuilder can proactively work together to deliver mixed use development for significant public benefit.

1.11 The Council's own approach to education improvements at Avonmore School² are commendable and have many similarities with the applicant's proposals. Approved on 19th December 2024, we note how the Council has addressed the complex issues of delivering new school facilities through enabling residential development on available brownfield land on site.

Need for an Enabling Development

1.12 Future Academies has been steadily improving the education outcomes at Phoenix Academy.

1.13 To build on the improving education standards, Future Academies would like to bring the buildings at Phoenix Academy up to modern standards.

1.14 Phoenix Academy lacks a single sports hall and classrooms are not environmentally suitable, being either too hot or too cold.

1.15 The existing campus arrangement and area of the buildings is too large for the pupil numbers, having being designed to accommodate 1300 pupils. The forecast PAN for the school is 900 pupils.

1.16 The existing buildings require extensive investment to refurbish and reorder them which the Trust does not have the funding for and would result in surplus floorspace.

1.17 Since 2018 Future Academies has been exploring the various options for funding the redevelopment of Phoenix Academy. External public bodies (DfE; Council; Home England etc.) were approached and they have confirmed that there is no public funding for Phoenix Academy. LocatED have confirmed that Phoenix Academy is not a priority for the DfE's School's Rebuilding Programme.

The School Requirements

1.18 As part of the land transaction the DfE have number of conditions which Future Academies need to comply:

- New buildings must comply with the Building Bulletins. Specifically, BB103 set outs internal and external area requirements :
- Based on the 5FE with 150 place six form BB103 requires a gross internal area of between 7,175m² and 8,203m².

² Application ref. 2023/03051/FR3

- The new building is 4,435m²; retained buildings are 3,656m²; total proposed gross internal area is 8,091m²

1.19 New buildings must comply the current DfE specifications. Specifically, Spec21 which is a significant step forwards for school design:

- Setting minimum standards for environmental performance, including energy performance, indoor air quality, and resilience to overheating.
- Requires new buildings to be low energy, fossil fuel free, and net zero carbon in operation.
- Sets BREEAM and BNG requirements.
- Requires buildings to be climate adaptable and resilient to climate change.

Housing

1.20 In 2020 and again in 2023, the Trust formally wrote to potential funding agencies in relation to the redevelopment of the school buildings. The Department for Education and Hammersmith and Fulham Council confirmed that no capital funding is available in the foreseeable future.

1.21 It has been confirmed that there is no external public funding and therefore the school has had to look at its own estate to generate funds.

1.22 London Square was selected following an open marketing campaign, resulting in a competitive bidding process. The proposed option of retaining and refurbishing The Vibe and Technology Buildings and constructing a new teaching and sports block will use 100% of the London Square capital receipt.

1.23 The residential development represents the minimum amount of development necessary to fund education infrastructure and affordable housing.

1.24 London Square's capital receipt will be paid to the Trust upon the grant of planning permission and Secretary of State approval. Following the grant of planning permission, the Trust will commence construction works alongside London Square to ensure that disruption to existing pupils and the school operation will be kept to a minimum. We expect to discuss triggers with the Council to ensure that the education works are commenced in a timely fashion.

1.25 The applicant understands the importance of affordable housing to the Council, and the strategic target of 50%. It is therefore necessary to work through the detail considering the costs of the school but there remains a strategic ambition to deliver the maximum reasonable amount of affordable housing.

1.26 The Government has identified a doubling of housing delivery for the Council against current London Plan targets from 1,609dpa to 2,783dpa. Delivery has averaged 1,166dpa therefore a dramatic response from all parties is required.

1.27 This report considers the principles of the proposal against Government planning reforms (Chapter 3); the justification for redevelopment at Chapter 4, 5 and 6; and the Council development plan policy (Chapter 11).

2 Introduction

- 2.1 This Planning Statement has been prepared by Quod on behalf of Future Academies and London Square (the 'Applicant') in support of a full planning application (the 'Planning Application') to be submitted to the London Borough of Hammersmith & Fulham (the 'Council') for the redevelopment of the Phoenix Academy site, The Curve, London, W12 0RQ.
- 2.2 The site comprises 2.96ha and is located within the Wormholt ward of Hammersmith & Fulham.
- 2.3 Full planning permission is sought for the following (the 'Proposed Development').

Demolition of existing buildings and structures, and comprehensive phased redevelopment of existing school site comprising new buildings, containing residential units (Use Class C3) and replacement school facilities (Use Class F1), together with private and communal amenity space, landscaping, car parking, cycle parking and other associated works.

- 2.4 Planning conditions are proposed to control the number of homes, the quantum of educational floorspace and the height of the buildings, the suggested wording below:

Unless otherwise agreed in writing by the Local Planning Authority, the total quantum of built floorspace for the Development shall be as set out below:

Detail	
Use	Amount
Residential (Use Class C3)	307 homes
Residential Building Heights	Up to 8 storeys
Education Floorspace (Use Class F1)	8,091m ² (GIA)
Education Building Heights	Up to 5 storeys

Reason: To ensure that the Development is carried out in accordance with the approved plans and other submitted details.

- 2.5 This planning statement covers the principal planning considerations raised by the Development and matters raised by the London Borough of Hammersmith & Fulham (the 'Council'); the Greater London Authority (the 'GLA'); local residents and amenity groups during pre-application discussions.
- 2.6 It is considered that the Application is strongly supported by national, regional and local planning policy and in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 when the Development is assessed against the development plan, followed by a review of relevant material consideration, there is a very strong case to grant planning permission.
- 2.7 In particular the development complies with the National Planning Policy Framework (the 'Framework') in the following areas:

- The Development is consistent with Government policies for housing (Chapter No. 5);
 - The Development is consistent with Government policies for achieving well-designed places (Chapter No. 12);
 - The Development is consistent with Government policies for conserving and enhancing the historic environment (Chapter No. 16); and
 - The Development is consistent with the development plan for the area.
- 2.8 It is considered that there is a very real and significant opportunity that exists at the Site. This is to provide new educational facilities, genuinely affordable homes for Londoners, alongside new market housing and a development proposal that respects its local context and meets the relevant development plan policy tests.
- 2.9 This proposal recognises that individuals and families, who need a home in Hammersmith & Fulham, should have the opportunity to live in a modern home which meets modern standards in a highly accessible location.
- 2.10 When benchmarked against Government policy, the Secretary of State's direction to the Mayor of London (2020), the London Plan 2021 (the 'LP'); and the adopted Hammersmith & Fulham Local Plan (the 'LBHFLP') we consider the proposal to be a success.
- 2.11 The Council, Mayor of London and the Secretary of State have both outlined in policy the importance of optimising housing delivery in the capital by delivering high density housing at accessible sustainable locations. In particular, brownfield sites are identified as appropriate locations for residential intensification and mixed-use redevelopment.
- 2.12 Future Academies and London Square will lead this exiting journey to transform this underused, brownfield site.
- 2.13 This report considers the extensive areas of discussion between the Applicant, the Council and the Mayor of London on nearly every facet of the proposal and assesses the proposals against development plan policy, the Framework and other material planning considerations, attempting to draw a balance about its overall acceptability within the context of the relevant planning policy tests.
- 2.14 The purpose of this Planning Statement is to define and assess the planning issues arising from the Proposed Development. This Planning Statement is structured as set out below.
- **Section 1 – Executive Summary:** This section considers the key planning benefits arising from the planning application and its key components.
 - **Section 2 – Introduction:** This section introduces the Planning Application.
 - **Section 3 – Get Britain Building:** An agenda for growth and change considers the many and recent ministerial statements from government which expect urgent and accelerated housing delivery.
 - **Section 4 – Why is redevelopment necessary:** The reasoned justification for seeking improvements to education provision at the Academy, made possible by the delivery of housing.

- **Section 5 – Hammersmith & Fulham Educational Needs:** Assesses the educational needs of the Borough.
- **Section 6 – Hammersmith & Fulham Housing Needs:** Assesses the acute housing needs in Hammersmith & Fulham and the delivery record to date.
- **Section 7 – The Application Documents:** This section lists the suite of supporting documents that accompany the Planning Application.
- **Section 8 – The Site and Surrounding Area:** This section describes the Site and surrounding area, and the planning application history of the Site to provide a context to the Planning Application.
- **Section 9 – Key Stakeholders and Pre-application Consultation:** This section explains the consultation that has been undertaken to help inform the proposals and ensure that local stakeholders understand the component parts of the application prior to submission.
- **Section 10 – The Proposal:** This section sets out the Proposed Development.
- **Section 11 – The Development Plan:** This section provides a commentary on the nature of the development in the context of local development plan policy and national planning policy and guidance.
- **Section 12 – Well Designed Places:** This section considers the compliance of the Application with regards to policies on design and placemaking.
- **Section 13 – Planning Considerations:** This section provides commentary on planning issues arising from the development including education and housing matters; and other environmental planning considerations.
- **Section 14 – Public Benefits and the Planning Balance:** This section discusses the public benefits arising out of the Planning Application which are material considerations which weigh in favour of the Planning Application.
- **Section 15 – Conclusions:** This section draws conclusions from the assessment of planning considerations undertaken.

3 Get Britain Building: An agenda for growth and change

- 3.1 There is a new policy context to the determination of planning applications which we discuss below.

Ministerial Statements

- 3.2 Since July 2024, the new Government, and the Chief Planner, have issued several statements to 'Get Britain Building', identifying the housing crisis that we face, and a very clear response to it.
- 3.3 The statements are summarised below and are expanded upon in this section.
- The King's Speech, background notes, 17th July 2024
 - SoS statement to parliament on building homes, 30th July 2024
 - SoS written ministerial statement "Building the homes we need", 30th July 2024
 - SoS letter to Councils "Playing your part in building the homes we need", 30th July 2024
 - Chief Planner Letter, 2nd August 2024
 - Brownfield passport policy, 27th September 2024
 - PM speech on a 'Plan for Change', 5th December 2024
 - PM' 'Plan for Change', 5th December 2024
 - Matthew Pennycook statement 'Building the homes we need', 12th December 2024
 - SoS letter to Councils "Building the homes we need", 12th December 2024
 - Chief Planner Letter, 13th December 2024
- 3.4 These ministerial statements apply to this application, and have informed the new Framework, published in December 2024, the key components of which we discuss in this statement.
- 3.5 The ministerial statements and written correspondence are material considerations which carry great weight and inform the decision maker of the clear direction of travel expected by the government.

Prime Minister and the Secretary of State

- 3.6 The King's Speech and briefing papers, delivered on 17th July 2024 set out the government's intent to get Britain building and to '*accelerate the delivery of high-quality housing*'. The speech recognises that the current planning regime acts as a major brake on economic growth and that more housing that communities need must be unlocked as an enabler of growth.

- 3.7 The Secretary of State made a statement to the House of Commons on the 30th July 2024³ outlining the government's plan to get Britain building, confirming that *'delivering economic growth is our number one mission'*, setting out *'a radical plan to not only get the homes we desperately need but to also drive the growth, create jobs and breathe life back into our towns and cities'*.
- 3.8 The Secretary of State confirmed that *'we're facing the most acute housing crisis in living memory; 150,000 children in temporary accommodation; nearly 1.3 million households on social housing waiting lists; under 30s less than half as likely to own their own home, compared to in the 1990s; and total homelessness at record levels'*.
- 3.9 The Secretary of State sets out a national increase in housing delivery, making it clear that the government will intervene where there is persistent failure to deliver new homes. The Secretary of State's ministerial statement *'Building the homes we need'*⁴ sets out the following policy objectives:-
- *'Sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people'*.
 - *'Nowhere is decisive reform needed more urgently than in housing'*.
 - *'We are in the middle of the most acute housing crisis in living memory. Home ownership is out of reach for too many; the shortage of houses drives high rents; and too many are left without access to a safe and secure home'*.
 - *'Reforms to fix the foundations of our housing and planning system – taking the tough choices needed to improve affordability, turbocharge growth and build the 1.5 million homes we have committed to deliver over the next five years'*.
 - *'Updating the standard method and raising the overall level of these targets – from around 300,000 to approximately 370,000'*.
 - *'If we have targets that tell us how many homes we need to build, we next need to make sure we are building in the right places. The first port of call for development should be brownfield land, and we are proposing some changes today to support more brownfield development: being explicit in policy that the default answer to brownfield development should be yes'*.
 - *'There is no time to waste. It is time to get on with building 1.5 million homes'*.
- 3.10 On the same day, the Secretary of State wrote⁵ to all local authority leaders and chief executives in England confirming the following:-
- As the Prime Minister explained on the steps of Downing Street, the government's work is urgent, and *'in few areas is that urgency starker than in housing'*.
 - *'As a nation we find ourselves in a dire situation given the depth of the housing situation'*.

³ Secretary of State statement to the House of Commons, 30th July 2024

⁴ Secretary of State's ministerial statement *'Building the homes we need'*

⁵ Secretary of State letter to all local authority leaders and chief executives in England, 30th July 2024

- Examples of this are record numbers of homeless children placed in temporary accommodation; waiting lists for social housing; and lack of affordability of home ownership.
- *'There is not only a professional responsibility but a moral obligation to see more homes built'.*

3.11 Most recently on 5th December 2024, the Prime Minister issued a statement⁶ to 'launch a golden era of building'. He set out the following objectives for the country:-

- *Britain is in the grip of the worst housing crisis in living memory. For too long, the country has been held to ransom by the blockers and bureaucrats who have stopped the country building, choked off growth and driven prices through the roof. They're suffocating the aspirations of working families and obscuring the future of our country. Those days are over.*
- *Take our planning system — urgently in need of decisive reform after decades of becoming increasingly ruinous. House prices have gone through the roof as home-building has gone through the floor. Last year, the number of homes granted planning permission fell to the lowest for a decade, and the average home now costs eight times the annual earnings of an average worker.*
- *It's no wonder home ownership for 19 to 29-year-olds has more than halved since 1990. And, disgustingly in 21st-century Britain, there are more than 150,000 children, the highest on record, in temporary accommodation, without a safe and permanent home. Since 2019, the number of our veterans that are homeless has increased by more than a quarter. This is a shame and a failure of our politics that my government will not tolerate.*
- *But this government's aim isn't to continue our path of managed decline, suggesting easy targets we know we can deliver to boast of our success while people continue to struggle. The entire point of this goal is to throw down a gauntlet — it's a challenge for the government, Whitehall, housebuilders, councils and everyone else to stretch ourselves to the max to meet the scale of the challenge we face.*

3.12 The government has made it clear that it expects development to come forward on brownfield land first and has strengthened policy to support this approach which we discuss below.

Stronger emphasis on the value of brownfield land

3.13 In recognition of the national, regional and local importance of using suitable brownfield land within settlements for homes and other identified needs to achieve the aims of sustainable development, the Framework specifically applies substantial weight⁷ to this policy. It now also includes a new policy in Chapter 11 of the Framework (Making Effective Use of Land) paragraph 125(c) that proposals should be approved unless substantial harm would be caused elevating the substantial weight to an 'approval'. The paragraph is copied in full below to include the additional wording:

⁶ Sir Keir Starmer statement 'Golden Era'

⁷ Framework paragraph 125 (c)

“125. Planning policies and decisions should: ...

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;...” [Quod emphasis]

- 3.14 This introduces a ‘positive test’ for development proposals on brownfield land, i.e. proposals should be approved unless substantial harm would be caused. As noted, this test is not merely ‘harm’, but ‘substantial harm’.
- 3.15 The government’s approach is explained in the government’s Framework Consultation Response 2024 which states that ‘Having carefully considered the responses received, we propose to implement a change to place even stronger emphasis on the value of brownfield redevelopment, but with amended wording to clarify the intent – that proposals for development on brownfield land should be approved unless substantial harm would be caused.’⁸ [Quod emphasis].
- 3.16 We consider whether substantial harm is caused by the S73 Application elsewhere in this statement, concluding that it does not. The proposals should therefore be approved.
- 3.17 The Framework establishes clear policy objectives to first prioritise brownfield land, make as much use as possible of brownfield land⁹, avoid building at low densities and optimise¹⁰ the use of surplus brownfield land in accessible locations. This is to ensure that homes are built in the right places and to allow people to live near the services they rely on, making travel patterns more sustainable. Again, as we explain in this statement, this is exactly what the S73 Application delivers.
- 3.18 More recently the government issued a policy paper¹¹ on ‘*Brownfield Passport: Making the Most of Urban Land*’. This policy paper reinforces the government’s approach to brownfield land. Whilst the passport element is new, the importance of making the most of urban land is a long standing and existing policy objective already interwoven into the Framework. We set out the key findings of the paper below.
- 3.18.1 Our cities and towns are at the heart of modern Britain. They are the engine rooms of our economy, fantastic places to live and work, and vibrant destinations for leisure and tourism.
- 3.18.2 The government wants to see our cities and towns flourish, which means making sure there are enough homes to support further growth – and that these homes are affordable.

⁸ Government’s response to the Framework consultation, Question 20 response

⁹ Framework paragraph 124

¹⁰ Framework paragraph 130

¹¹ The paper forms part of a series of working papers on different aspects of planning reform, designed to inform further policy development in collaboration with the wider sector.

- 3.18.3 The government wants our urban centres to grow in a way which delivers long-term prosperity, with sustainable patterns of development, meaning that homes are close to jobs, and take advantage of places with good connectivity.
- 3.18.4 Sustained economic growth is this government's most important mission because it is the only route to improving the prosperity of our country and the living standards of working people.
- 3.18.5 The government has been clear that the first port of call for development should be brownfield land.
- 3.18.6 It is with these goals in mind that the government has proposed some immediate changes to national planning policy, including being explicit that the development of brownfield land should be regarded "*as acceptable in principle*".
- 3.18.7 Making the most of urban brownfield land through the planning system matters for multiple reasons. The government wants to deliver the homes and other development the country needs in a way that draws as much as possible on existing infrastructure and access to jobs. '*And it is clear that many parts of our cities and towns could be put to better use: transforming derelict sites that are a blot on communities into valued parts of the urban fabric, and pursuing higher density, well-designed development in suitable and sustainable locations*'¹². This makes sense not just for social and environmental reasons, but for economic ones too, given that bigger cities drive greater productivity.
- 3.18.8 Given our relatively low densities, there is scope in many areas for increases. '*While such increases should take account of local character, existing character should not be used to block sensible changes which make the most of an area's potential, and which can create sustainable, well-designed and productive places to live and work*'¹³.

3.19 Moreover, it is relevant that the 30 July 2024 Ministerial Statement on Building in the Right Places provides strong support for the development of Brownfield Land such as the Site. It states that:

'... The first port of call for development should be brownfield land, and we are proposing some changes today to support more brownfield development: being explicit in policy that the default answer to brownfield development should be yes; ... reversing the change made last December that allowed local character to be used in some instances as a reason to reduce densities; and in addition, strengthening expectations that plans should promote an uplift in density in urban areas'¹⁴. [Quod emphasis]

3.20 The objectives of the government's policy paper are applicable to the S73 Application as a whole.

¹² Brownfield Passports, '4 Our Objectives', page 3

¹³ Brownfield Passports, '5.2 Scale of Development', page 4

¹⁴ Ministerial Statement, Building in the Right Places, 30th July 2024 page 2/7

The need for housing in London

3.21 As we discuss further in Section 3, and 4 of this statement, the government acknowledges that London has fallen well short of delivering the homes that are needed.

More important than setting a deeply ambitious but credible target is of course meeting it. The Government is clear that recent delivery in London has fallen well short of what is needed, and that is why we are committed to working in partnership with the Mayor of London and the GLA to turn this around - including by optimising density and through Green Belt review¹⁵.

3.22 The Secretary of State wrote to the Mayor of London confirming the following:-

Output in the capital will have to increase markedly from the current average of 37,200 homes per year (2019 to 2023). I appreciate fully the scale and breadth of the housing delivery challenge in London, and I recognise that the city faces unique issues, but the government does expect London to take steps to boost its output ... We both appreciate the need to urgently deliver more homes of all tenures if we are to tackle the housing crisis and boost economic growth and I know you share my commitment to doing so... This will be critical to achieving our joint goal of tackling the housing crisis¹⁶.

3.23 The application facilitates the need to urgently deliver more homes of all tenures.

Accelerating Housing Delivery in London

3.24 The Greater London Authority issued a planning and housing practice note (PGN) in December 2024. The relevant aspects of this note for this application are set out below.

- Increasing housing delivery in London is a key priority for the Mayor, and his strategy for Good Growth in London. As part of this, the provision of affordable housing is particularly crucial for ensuring that housing meets the needs of Londoners. Affordable housing provision is also important in diversifying and increasing overall supply. (1.1)
- The practice note focuses on increasing the provision of affordable homes and wider housing delivery, including social rented housing for households in greatest housing need and intermediate housing for key workers and middle-income earners. (1.3)
- There are challenges currently facing housing delivery in London in the short term (1.4).
- There are a range of challenges that are affecting affordable housing delivery, including current market conditions and the sale of S106 affordable homes to Registered Providers and councils. (2.7)
- Significant build cost inflation has increased development costs. RP and council financial constraints are likely to continue to affect affordable housing delivery in the short to medium term. (2.8)
- This indicates that significant interventions will be required to maintain and increase affordable housing delivery in the coming years. (2.9)

¹⁵ Our plan to get Britain Building again, MHCLG 31st July 2024

¹⁶ Secretary of State wrote to the Mayor of London on this issue on 30th September 2024

- The Mayor wishes to promote intermediate rent housing as an additional tenure to intermediate sale products such as shared ownership to provide a range of options for households with different incomes and circumstances. (5.1)
- Providing a mix of tenures including affordable housing reduces exposure to market absorption rates and speeds up housing delivery. (8.2)
- The GLA believes that supporting intermediate rent homes helps those on middle incomes, which in turn benefits London's economy and services, and can also help wider viability issues on projects. (8.17)
- The 2023 GLA Housing Design Standards London Plan Guidance (HDS LPG) should not be applied mechanistically in a way that inhibits delivery and should be applied in the context of the need to optimise site capacity, particularly in respect of dual aspect homes (standard C4.1). (9.2)

3.25 Whilst the GLA did not consult on the PGN, reducing the weight that can be applied, those matters identified above are considered to be consistent with the Framework, known macroeconomic effects, and ministerial statements and therefore carry weight. However, the PGN also confirms that it is a material consideration in the determination of planning applications.

The Framework

- 3.26 The Framework sets out the government's planning policies for England and how these should be applied. As a material consideration the Framework is given the greatest weight and should be read as a whole¹⁷.
- 3.27 The Framework was adopted on 12th December 2024 (updated 7th February 2025) and sets out the government's objective to significantly boost the supply of homes¹⁸. It seeks to draw together housing need and the delivery of that need to ensure that an area's identified housing need is met¹⁹. The standard method is to be used to determine the '*minimum*' number of homes needed and the Framework reinstates the requirement to demonstrate a five year housing supply²⁰.
- 3.28 The government has deleted the exclusions introduced by the previous government which advised that housing numbers are advisory starting points; that local authorities do not need to plan density uplifts if the resulting form would be wholly out of character with an existing area²¹; and that local need should be met '*as much as possible*'²².
- 3.29 The Framework applies '*significant weight*' to the need to support economic growth and productivity taking into account both local business needs and wider opportunities for development²³.
- 3.30 The presumption in favour of sustainable development (paragraph 11d)(ii) has been revised to pay particular regard to key policies for directing development to sustainable locations,

¹⁷ Framework paragraph 3

¹⁸ Framework paragraph 61

¹⁹ Framework paragraph 61

²⁰ Framework paragraph 78

²¹ Framework (2023) paragraph 130

²² Framework (2023) paragraph 60

²³ Framework para 85

making effective use of land, securing well-designed places and providing affordable homes, individually or in combination²⁴.

- 3.31 Where major development involving the provision of housing is proposed, planning decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.²⁵
- 3.32 The application is consistent with policies of the Framework.

Sustainable Development

- 3.33 The Framework confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. The objective of sustainable development can be summarised as '*meeting the needs of the present without compromising the ability of future generations to meet their own needs*'²⁶. Achieving sustainable development means that three overarching aims are achieved interdependently through improving the economic, social and environmental conditions of the area²⁷. The S73 Application achieves economic, social and environmental objectives.
- 3.34 The importance of '*meeting needs*' and providing sufficient housing is manifest to sustainable development, especially on brownfield land where there is an identified shortage of land to meet existing and future housing needs. The Framework recognises that the provision of new homes and commercial floorspace is an integral part of sustainable development and establishes a presumption in favour of it at its heart²⁸, so that it is pursued in a positive way, granting planning permission without delay.
- 3.35 Decision makers at every level are expected to approve applications for sustainable development wherever possible²⁹. Sustainable development that delivers public benefits which significantly weigh in favour of granting planning permission should be approved. Significant development should be focused on locations which are or can be made sustainable³⁰. In our opinion, the S73 Application represents sustainable development.

Education

- 3.36 The government has updated its education policies. All levels of education provision are now recognised in the Framework, and significant weight will be applied accordingly. Paragraph 100 of the NPPF (2024) states:

It is important that a sufficient choice of early years, school and post-16 places are available to meet the needs of existing and new communities. Local planning authorities should take a

²⁴ Framework Footnote 9 refers to the following chapter and paragraphs (5) Housing para 66 and 84; (7) town centres para 91; (9) transport para 110 and 115; (11) efficient use of land para 129 (12) design para 135 and 139.

²⁵ Framework, paragraph 66

²⁶ Framework paragraph 7

²⁷ Framework paragraph 8 and 39

²⁸ Framework paragraph 10

²⁹ Framework paragraph 39

³⁰ Framework paragraph 110

proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

a) give great weight to the need to create, expand or alter early years, schools and post 16 facilities through the preparation of plans and decisions on applications; and

b) work with early years, school and post-16 promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

- 3.37 The weight applied, to “significant” on “the importance of new, expanded or upgraded public service infrastructure when considering proposals for development”, as set out within Paragraph 101 of the NPPF, which states that “local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted”.

“Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.” [Quod emphasis]

- 3.38 The government, and local authorities, should therefore apply significant and great weight to these proposals as they upgrade education infrastructure, working proactively with delivery partners.

4 Why is redevelopment necessary?

- 4.1 This chapter sets out some of the background to the Phoenix Academy and reasoned justification for seeking improvements to education provision at the Academy.

Phoenix Academy

- 4.2 Phoenix Academy is a flourishing mixed, non-selective coeducational secondary school and sixth form admitting students from the ages of 11 to 18.
- 4.3 It is part of Future Academies Multi-Academy Trust (MAT) and offers a rich and stimulating education comprised of a knowledge-rich curriculum, diverse cultural and extracurricular opportunities, and a strong pastoral support system. All children are welcomed in the inclusive community, and all are challenged to be the best they can be.
- 4.4 Future Academies is the sponsor of Phoenix, and enables engagement with the best teachers, the best universities and a wide range of the most prominent employers in the country to ensure that all children are equipped with the knowledge and desire to be the best in whatever path they wish to follow. This ethos is embodied in the Trust values (Knowledge, Aspiration, and Respect) and in the school motto, "*libertas per cultum*" ("freedom through education").
- 4.5 Future Academies comprise a family of schools across London and Hertfordshire dedicated to improving the life chances and broadening the horizons of young people. Future Academies is an educational charity and as a charitable organisation fulfils its objectives by welcoming schools with significant challenges into their family of schools and supporting them on their journey to becoming Ofsted Outstanding.
- 4.6 Current other academies include Laureate Academy; Pimlico Academy; Millbank Academy; Pimlico Primary; Churchill Gardens Academy; Barclay Academy; Francis Coombe Academy; and the Bushey Academy.
- 4.7 Phoenix Academy, under the stewardship of Future Academies, outcomes at KS4 placed it in the top 2% of schools in the country and, following the school's Ofsted inspection in November 2024, it was judged to be Outstanding in every category. Inspectors could offer no areas for development; however the buildings remain unfit for purpose, and Phoenix Academy urgently require a rebuild of the facilities to match the quality of the education offer.
- 4.8 The Trust is therefore seeking to:
- Continue to maintain and build on the Ofsted rating by improving teaching whilst reducing anti-social behaviours.
 - Improve the facilities available to pupils to provide alternative choice for highly subscribed local schools.
 - Retain students within the borough by providing excellent facilities and stronger connections with local primary schools.

Background

- 4.9 The site has been an education facility since the 1950's.
- 4.10 Prior to 1982 there were two schools on the current site of Phoenix High School: Christopher Wren Boys' School and Hammersmith County Girls' School. In 1982, these two single-sex schools were merged into one co-educational comprehensive school on a single campus. This school was named Hammersmith School, with the two major wings named Wren Wing and County Wing to denote the previous school buildings. At the time of merging, the combined pupil population was 2,200.
- 4.11 By the early 1990s, both the pupil population and educational standards at Hammersmith School had fallen and it was judged by OFSTED to be a "*failing school*". A relaunching and rebranding of the school to The Hammersmith School failed to improve standards, and in November 1991 a major fire started by pupils in Wren Wing building caused extensive damage.
- 4.12 In 1994 the school had been placed in special measures and was listed as one of the eight most challenging schools in England, the school population had fallen to 500 pupils. The school improved under a new headmaster, and with 759 students was reported to be one of the "*most improved school*" in the UK in 2007. However following the headmaster's departure, the school once again declined into special measures in May 2016 slipping from Ofsted 'outstanding' to 'Inadequate'.
- 4.13 The school became an academy in September 2016 and was renamed Phoenix Academy and has been improving and transforming the educational experience of students ever since. The Trust have since succeeded in improving behaviour, attendance and general teaching, resulting in gaining Ofsted 'Good'.
- 4.14 The Trust is therefore seeking to:
- Continue to improve the Ofsted rating by improving teaching whilst reducing anti-social behaviours.
 - Improve the facilities available to pupils to provide alternative choice for highly subscribed local schools.
 - Retain students within the borough by providing excellent facilities and stronger connections with local primary schools.

Alumni

- 4.15 The Phoenix Academy, and the local community, are exceptionally proud of their history and achievements. The school has several well-known alumni, including:
- Les Ferdinand – former professional footballer and director at Queens Park Rangers FC;
 - Heather Small – singer;
 - Wes Foderingham – professional footballer for West Ham FC;
 - Mosunmola "Mo" Abudu – philanthropist;
 - Dennis Wise – former professional footballer for Chelsea FC; and
 - Betty Boo – singer.

- 4.16 The applicants propose to engage with former pupils, current pupils, parents, guardians and the community as part of the pre-application process.

Justification for redevelopment

- 4.17 Fundamentally, the site comprises the amalgamation of two secondary schools, the capacity of which (12,378sqm (GIA)) is too great for the current (560 pupil Number on Roll) and forecast with growth (900) student roll for the site.
- 4.18 The series of interconnected buildings that were constructed between 1950's-2010's as the school expanded, are inefficient and are spatially challenging. The building layouts and circulation routes result in behavioural issues with many blind spots making management and surveillance difficult.
- 4.19 The majority of the buildings on the site are over 70 years old and are designed for a very different education pedagogy. As such, the site comprises an inefficient use of urban land, disused land and buildings. Facilities do not comply with current educational build standards and do not allow for a full curriculum to be delivered.
- 4.20 The site is too large for an inner-city school, and the Academy does not currently use, nor needs to use, all of the buildings onsite, with the older blocks moth balled. There is poor thermal and building fabric performance which results in overheating in summer and cold conditions in winter, resulting in high operation costs diverting funding away from education. There is a need for consolidation of, and new, facilities on site.
- 4.21 In line with the Funding Agreement from the DfE, the Academy's existing Planned Admission Number is 900, comprising 750 in Years 7-11 and 150 places in the Sixth Form.
- 4.22 Given the age of the existing buildings there is a large and growing back-log maintenance requirement (more than £4 million³¹), much of which predates the Trust taking over of the school.
- 4.23 Comprehensive refurbishment costs to remove all the asbestos from all the existing buildings are in excess of £30 - £40 million³². Without external funding, the Trust is unable to afford the cost of the significant historic backlog in maintenance and building condition issues.
- 4.24 A proposal to dispose of school land to fund on site improvements has therefore been developed over a number of years. Phoenix Academy is not eligible for the Department for Education's School Rebuilding Programme, and thus has taken the careful decision to self-fund the work.

Disposal land

³¹ In August 2011, EC Harris were commissioned by the Council to carry out a condition survey of the school buildings. The condition report concluded that many of the buildings were in need of extensive refurbishment which at the time was estimated to cost in the region of £4million.

³² 2019/20 updated again in 2023

- 4.25 The Trust undertook a review of its estate and determined that the most appropriate area of potential was to the west of the site. This area contains the oldest, poorest quality buildings and land which is surplus to requirements and disused.
- 4.26 This land does not contain sports playing fields.
- 4.27 As the current PAN is less than half of what the original 1980s site was developed for, disposing of 33% of the site (1.25ha) will not comprise the Academy's ability to provide suitable outdoor education provision and sports facilities.

New facilities

- 4.28 The applicant is proposing to improve the educational experience by upgrading the teaching and learning facilities on site through refurbishment and new build. The most important consideration with respect to the redevelopment of the site is to ensure the provision of the best quality education facilities to serve the needs of the pupils, to provide local community access, opportunity and quality of facilities and landscaping on site.
- 4.29 In the context of the current Planned Admission Number (PAN) and the latest DfE BB103 design and space standards for secondary schools, the retained school land is comfortably large enough to accommodate a 5-form of entry school (750 pupils in Years 7-11) with a Sixth Form of a further 150 students, requiring accommodation for 900 students on the site, nearly double the existing figure.
- 4.30 The ambition is to develop modern, fit-for-purpose classrooms and sports facilities, including a new 3-court Sports Hall. The new buildings will adhere to the latest educational design guidance, with appropriate lighting, natural ventilation and sustainability credentials, alongside the incorporation of the more contemporary refurbished existing buildings.
- 4.31 The proposal is to demolish the 1950s buildings, and to replace these with a new multi-storey teaching block of c. 4,720sqm which will run parallel to the retained Vibe Building and Technology Building. These retained facilities will consist of approximately 3,480sqm creating an estimated overall of circa 8,200sqm (GIA) compliant with British standard requirements. The existing area comprises 12,378sqm (GIA).
- 4.32 BB103 external standards will also be met for hard informal & social areas, proposed 4,200sqm (BB103 recommended 1,100-2,400sqm); hard outdoor PE, proposed 1,800sqm (BB103 recommended 1,750 – 3,050sqm); soft informal and social area, proposed 3,700sqm (BB103 recommended 2,400 – 3,700sqm), and habitat proposed 2,900sqm (BB103 recommended 450-1,750sqm).
- 4.33 The only metric not complied with is soft outdoor PE which would require the whole site and more to be designated at 3.75ha - 4.8ha. 1500sqm is proposed in addition to the new sports hall.
- 4.34 The proposals mean that the buildings can be redeveloped over the next 2-4 years for the current and upcoming students.

Other Properties

- 4.35 The Phoenix Fitness Centre and Janet Adegoke public leisure centre and swimming pool shares certain facilities with the Academy. The shared facilities and plant rooms will not be altered. No refurbishment works will be undertaken to the fitness centre.
- 4.36 The Cambridge School does not share any of its facilities with the Academy. The Cambridge School lease a standalone single storey block from the Trust, and also currently rent (on a rolling 12-month lease) the sixth form kitchen and the technology block. These will need to be returned to the Academy when the Academy works start with the Cambridge School considering alternative arrangements.
- 4.37 To the east of Cambridge School are community allotments (Phoenix Farm). These will remain as existing.

Funding

- 4.38 In 2020 and again in 2023, the Trust formally wrote to potential funding agencies in relation to the redevelopment of the school buildings. The Department for Education and Hammersmith and Fulham Council confirmed that no capital funding is available in the foreseeable future.
- 4.39 It has been confirmed that there is no external public funding and therefore the school has had to look at its own estate to generate funds.
- 4.40 London Square was selected following an open marketing campaign, resulting in a competitive bidding process. Founded in 2010, London Square has built its reputation by respecting, understanding and exceeding the needs of its customers and the communities that it builds within. Its achievements have been recognised by the industry with numerous awards, including an impressive collection from WhatHouse?, Evening Standard and RESI.
- 4.41 The proposed option of retaining and refurbishing The Vibe and Technology Buildings and constructing a new teaching and sports block will use up 100% of the London Square capital receipt.
- 4.42 The residential development represents the minimum amount of development necessary to fund education infrastructure and affordable housing.
- 4.43 London Square's capital receipt will be paid to the Trust upon the grant of planning permission and Secretary of State approval. Following the grant of planning permission, the Trust will commence construction work working alongside London Square to ensure that disruption to existing pupils and the school operation will be kept to a minimum. We expect to discuss triggers with the Council to ensure that the education works are commenced in a timely fashion.

Education regulatory requirements

- 4.44 To support Section 77 of the School Standards and Framework Act 1998 ("SSFA 1998") the DfE has published guidance to obtain prior written consent of the Secretary of State for Education to dispose of land used by maintained schools and academies (which includes any transfer/sale of freehold or leasehold land and the grant/surrender of a lease).

- 4.45 The project involves the disposal of surplus land and change of use of playing field land as defined in the School Standards Framework Act 1998. As such, the Trust are required to obtain consent from the Department for Education for the masterplan proposals. This is separate to the planning application approval and is known as a DfE 'Form B' Application (for disposals of or including playing field land) and includes the Playing Field Section 77 application.
- 4.46 In line with the requirements of the Section 77 application, in September 2020 and again in the Autumn of 2023 (October-December 2023), the Trust wrote to all the public local education providers (primary, special and secondary schools) within the vicinity to inform them of the disposal of the land. Education providers were invited to confirm whether they required the land for educational purposes. This has established that there are no educational providers that require the land for educational purposes.
- 4.47 Although the Section 77 application can only be submitted, considered and approved once a scheme has gained planning approval, to ensure that the proposals would be deemed acceptable, the continues to liaise with the DfE regarding the earliest design stages and potential disposal of land. This process ensures that the DfE is aware of proposals and can highlight any constraints, opportunities or potential improvements to the scheme ahead of submitting the planning application.
- 4.48 A draft 'Form B' was submitted in August/Summer 2023, and it was agreed following a meeting with DfE officials that the Playing Field Consultation and a Red Book Valuation would be undertaken in the autumn (both of which were completed).
- 4.49 A full list of schools contacted under the Playing Field Section 77 Consultation, and the school responses, is held by the Trust and will be made available.

5 Hammersmith & Fulham Educational Needs

- 5.1 LBHF is not directly responsible for running secondary schools in the borough as all mainstream Year 7 to 11 schools are either academies or independent schools. Therefore, the council's own plans for active changes to the school estate have focused on primary education, where there remain many borough-run community schools.
- 5.2 However, the council retains an overall statutory duty to plan for sufficient maintained school places, including at secondary level. The borough's 2018 Local Plan (paragraph 9.5) sets the council's key education priorities as meeting demand, supporting choice, increasing percentage of resident children choosing the borough's schools, and delivering the Special Schools Strategy.
- 5.3 The Council published the 2022/23 School Organisation Strategy as a five-year plan for delivery of school places, and in 2024 this was supplemented by the Strengthening Education Provision in Hammersmith & Fulham plan. The overall message of these two documents is about maintaining and upgrading the quality of ageing schools while managing the decline in demand for school places.
- 5.4 The School Organisation Strategy notes that past expansions of secondary schools, to meet the needs of the bulge in population, mean that there are now sufficient places. As pupil numbers now decline, surplus capacity in secondary schools in the borough is projected to rise from 6% to 18% by 2031. It states that "any increase in pupil places will result in excessive surplus as projected secondary roll projections fall towards the end of the decade".
- 5.5 The Strategy concludes that there are too many unfilled places at primary level, but not at secondary level. To help balance demand, it proposes that "no new primary or secondary expansion programmes be agreed in the medium to long term (5 to 10 years)".
- 5.6 The Strengthening Education Provision in Hammersmith & Fulham plan follows on from this strategy, taking the input of an education steering group to recommend an approach to managing the surplus in primary school places. This approach may include reductions in intake, amalgamation, or closures.
- 5.7 Note that the borough currently has no similar plan in place to co-ordinate cuts to secondary school places, only the aim to avoid expansions. This reflects the fact that there has not yet been such a significant fall in demand at secondary school level, and that the borough aims to maintain a higher surplus of places (10% at secondary compared to 5% at primary) in order to facilitate parental choice.
- 5.8 Secondary schools, because of their larger size, are in general able to accommodate greater rises and falls in demand without suffering the same viability issues as smaller primary schools. The borough also imports significant numbers of secondary school children from neighbouring boroughs, including Ealing and Brent which border the north of the borough near Phoenix Academy. The high performance and excellent reputation of LBHF schools such as Phoenix is therefore likely to help maintain demand, in line with the borough's aim to retain more local pupils within the borough's own schools. In the longer term, this may also be supported by

significant housing development in the White City Opportunity Area, and in the Old Oak Park Royal Development Corporation area, which may partially offset the effects of falling births.

- 5.9 On balance, therefore, the evidence from current school rolls, future projections, and LBHF's own policies, are supportive of broadly maintaining the current level of secondary school capacity across the borough. The proposals for Phoenix while notionally reducing floorspace, in practice is replacing redundant or unusable space with new higher-quality school buildings. In doing so it will maintain the current admissions capacity of the school and is, therefore, well-aligned with LBHF's own education transformation plans.
- 5.10 This is reinforced by the fact that the Trust has written to all the public local education providers (primary, special and secondary schools) within the vicinity to inform them of the disposal of the western land. This consultation has established that there are no educational providers that require the land for educational purposes.

Funding shortfalls

- 5.11 Funding for the repair, renewal or replacement of school premises has been limited for many years, and nationally a major backlog of urgent capital costs has accumulated. This funding shortfall was made worse by the safety issues around RAAC concrete across many schools in England.
- 5.12 As a result, schools such as Phoenix, have little current prospect of gaining the substantial public funding needed to tackle their maintenance backlogs, let alone invest in improved facilities.
- 5.13 As far back as 2011 (before Future Academy trust were involved), an EC Harris condition survey for LBHF estimated the maintenance backlog was £4 million, and since then little funding has been available for ongoing maintenance and this backlog has continued to grow. In 2023, the Trust commissioned Gleeds to review the condition of the school, which concluded refurbishment would cost over £30m.

Potential funding sources

- 5.14 Most school funding is for revenue costs, including teachers, with capital funding typically small scale or very restricted. For 2025/26, Phoenix Academy was awarded just £13,737 in Devolved Formula Capital funding.
- 5.15 The Future Academies Trust, as a multi-academy trust, is not eligible for the Condition Improvement Fund, but instead was allocated £1.5m in total from the School Condition Allocations budget. This equates to only £150,000 per school across the ten academies that the Trust is responsible for.
- 5.16 LBHF is not able to claim funding for Phoenix Academy from the DfE's Basic Needs funding, as this is for expansions only, not repairs or re-provision.
- 5.17 That leaves the School Rebuilding Programme (the successor to the previous Building Schools for the Future and the Priority Schools Building Programme) as the only public budget suitable for tackling the issues with Phoenix's buildings.

- 5.18 This national fund provides support for only 50 schools a year in England out of a total of more than 21,600 schools, far less than is needed to meet demand. This means that countless schools with serious and urgent repair issues will be waiting for many, many years before they can be addressed through public funding.

The important role of housing

- 5.19 In the 10-15 years it could take before Phoenix became eligible for these tightly limited funds, many hundreds more children will have passed through all of their years of secondary schooling in Phoenix's existing ageing buildings. A more urgent solution is needed.
- 5.20 In 2018, the Trust consulted with DfE and undertook a strategic review with the Secretary of State's education property agency LocateED. Given the lack of available funding, and the fact that the school had surplus land, this review concluded by recommending that the Trust fund new school buildings through residential development on the surplus land.
- 5.21 LBHF have confirmed that they do not have funds available for rebuilding the Phoenix Academy themselves. The borough is pursuing a similar approach to alternative funding on their own school estate, with its Community Schools Programme. This will see Avonmore Primary School rebuilt thanks to funding from housing development on part of its site.
- 5.22 In discussing why they have adopted this approach at Avonmore, the Borough have stated:

"Since the Government's Building School for the Future programme was halted in 2010, financial investment in school upkeep across the country has been minimal. This means children in Hammersmith & Fulham community schools are being taught in buildings that are in poor condition and are no longer fit for purpose." and

"Given the continuing financial limitations on local government, the best way to build the schools to the standards that children and staff deserve, and in a way that will last, is by generating investment from the existing sites." - LBHF

- 5.23 While Phoenix, as an academy school, is not part of LBHF's own Community Schools Programme, it faces exactly the same issues, and the conclusion is the same. The only realistic prospect of seeing high quality new buildings in place for the current generation of children in White City is for this to be funded through residential development.

6 Hammersmith & Fulham Housing Needs

- 6.1 Hammersmith and Fulham's housing needs are acute, and housing delivery in the borough has been significantly beneath targets. This has given rise to adverse social, economic and environmental effects which we discuss in this section, and which the Prime Minister and Secretary of State have drawn attention to nationally.

Summary

- 6.2 The Council's housing position can be summarised below at Table 6.1

Table 6.1 – Hammersmith & Fulham Housing Summary

Metric	Hammersmith & Fulham
AMR ³³ Indicator 1 Housing (Completed 21/22)	1,700
AMR ³⁴ Indicator 4 Affordable (Completed 21/22)	589
2024/2025 homes completed ³⁵	1,221
2024/2025 affordable homes completed ³⁶	513
3-year housing record	3,966 (861 home deficit against London plan minimum)
6-year housing delivery record	6,999 (2,655 home deficit against London Plan minimum)
6-year average housing delivery record	1,166pa
6-year average affordable housing delivery record	312pa
Local Plan	Out of date
Council's last published 5YHLS figure	Published June 2017
5YHLS	No
Current annual housing requirement	2,783 dwellings per annum

Housing

- 6.3 This proposal is of regional and local importance because it proposes new C3 housing in the borough.
- 6.4 The LBHF Local Plan Policy HO1 sets a housing requirement (as required under the London Plan 2016) of 1,031 new dwellings per annum to be provided in LBHF between 2016 and 2035. The housing trajectory under the London Plan steps up the delivery against this requirement

³³ Annual Monitoring Report 2021/22

³⁴ Annual Monitoring Report 2021/22

³⁵ Source: Mayor of London – London Datastore: <https://data.london.gov.uk/dataset/residential-completions-dashboard>

³⁶ Source: Mayor of London – London Datastore: <https://data.london.gov.uk/dataset/residential-completions-dashboard>

over time, with 615 dwellings per annum 2011/12 to 2015/16, 1,031 per annum 2016/17 to 2020/2021, and 1,609 per annum from 2021/22 to 2028/29.

- 6.5 London Plan Policy H1 seeks to ensure that 10-year housing targets are achieved and sets out that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites. Within the London Plan, Table 4.1 sets a ten-year target for housing delivery of 16,090 new homes across the borough – 1,609 new homes per annum. This is the Borough’s housing target, as the LP (2021) updates the Council’s Local Plan (2018) target.
- 6.6 The government has now identified increasing the housing delivery against current London Plan targets for the Council from 1,609 homes to 2,783 homes per annum.
- 6.7 Table 6.2 below demonstrates the residential completions rates for the Council for the last seven years (excl. 25/26) which demonstrates the challenges of meeting housing targets.

Table 6.2 – LBHF Housing Completions³⁷

Year	Completions	Target	% of Target
2024/25	1,221	1,609	76%
2023/24	1,563	1,609	97%
2022/23	1,182	1,609	73%
2021/22	1,213	1,609	75%
2020/21	1,463	1,031	142%
2019/20	357	1,031	35%
Total	6,999	8,498	82%
Average	1,166	1,416	82%

- 6.8 The provision of 307 residential homes will make a significant contribution to new homes in the borough.

Affordable Housing

- 6.9 The NPPF defines affordable housing as *“housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers).”*
- 6.10 Chapter 11 makes clear that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions, making as much use as possible of previously developed or brownfield land.

³⁷ Source: Mayor of London – London Datastore: <https://data.london.gov.uk/dataset/residential-completions-dashboard>

6.11 The NPPF defines affordable housing as *“housing for sale or rent, for those whose needs are not met by the market”* and complies with the relevant definitions:

- Affordable housing for rent: housing let by a registered provider (with the exception of BtR) at rents set in accordance with Government policy or is at least 20% below market rents and includes provision to remain affordable for future eligible households.
- Affordable routes to home ownership: housing for sale available to those who cannot achieve home ownership through the market, one such route being Shared Ownership.

6.12 Within the London Plan (2021), Policy H4 sets a strategic target for 50% of all new homes delivered across London to be genuinely affordable. Developments are expected to maximise the delivery of affordable housing and make the most efficient use of available resources to contribute towards the strategic target.

6.13 Policy H5 sets out the Threshold Approach to Viability. The threshold is set at 35% affordable housing (or 50% for public sector land not part of a Portfolio Agreement with the GLA or industrial sites). The percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes.

6.14 Schemes which meet the threshold and the additional criteria set out in Policy H5 may follow the Fast Track Route and are not required to submit viability information.

Fast Track Route

6.15 Applications that meet or exceed 35% affordable housing provision (or 50% for public land) without public subsidy, provide affordable housing on-site, propose an agreed tenure mix, and meet other planning requirements and obligations to the satisfaction of the LPA and the Mayor where relevant, are not required to submit viability information. Such schemes will be subject to an early viability review, but this is only triggered if an agreed level of progress is not made within two years of planning permission being granted (or a timeframe agreed by the LPA and set out within the S106 agreement).

6.16 The Mayor’s preferred affordable housing tenure mix includes a range of products to meet different needs – principally low cost rented accommodation to meet general needs, and London Living Rent and shared ownership to meet intermediate needs.

Accelerating Housing Delivery Planning & Housing Practice Note in December 2024 (‘The GLA Practice Note’)

6.17 The GLA has published guidance in order to support delivery of affordable housing. The document aims to bring forward additional measures to support housing delivery under the Mayor’s planning and housing powers. This practice note focuses on short-term delivery and forms part of wider approaches established through the London Plan and the Mayor’s Housing Strategy.

6.18 The GLA Practice Note focuses on increasing the provision of affordable homes and wider housing delivery, including social rented housing for households in greatest housing need and intermediate housing for key workers and middle income earners. It includes time-limited approaches that will be kept under review and may be withdrawn as market conditions

improve. It sets out measures to support councils and registered providers of social housing (RPs) to deliver more affordable homes and to attract more institutional investment to the sector.

- 6.19 This GLA Practice Note is a material consideration for the purposes of determining planning applications. In recognition of the challenges currently facing housing delivery in London in the short term, Local Planning Authorities (LPAs) and applicants are strongly encouraged to implement the approaches in this practice note when bringing forward guidance, submitting and assessing planning applications and supporting the delivery of the pipeline of consented schemes.
- 6.20 The London Plan identifies the priority that should be given to low-cost rent housing, including social rent. In view of the particular need for social rented homes to provide for households with the lowest incomes and reduce need for temporary accommodation for homeless households, the Mayor wishes to promote additional measures that enhance the delivery of social rent. This is consistent with the objectives of the government as set out in national policy and ministerial statements.
- 6.21 In view of the significant and increasing need for social rent, the Mayor supports schemes that provide affordable housing as social rent only (or with a majority of social rent) at the equivalent level to a policy compliant threshold to be delivered, without requiring full viability assessments or mid-term or late stage reviews, where the social rent provision is the equivalent to the relevant affordable housing threshold level at the local plan tenure split.

Affordable Housing Delivery

- 6.22 The 2018 SHMA evidenced a need for 8,756 affordable homes between 2016-41, comprising 2,457 homes required to meet the current affordable housing need and 6,299 homes to meet the projected affordable housing need. The affordable housing need made up 55.7% of the future housing requirement.
- 6.23 The London Plan has set a target of 1,609 homes to be delivered per annum, reflecting increased population growth since the 2018 SHMA. LBHF currently has a policy target of 50% of all homes to be affordable, meaning 805 affordable are required per annum (increased from the 2018 SHMA target reflecting overall increases in housing need).

Table 6.3 - Hammersmith and Fulham Affordable Housing Delivery Deficit³⁸

Year	H&F Housing Delivery	Minimum Target	Deficit
2024/25	513	805	-292
2023/24	388	805	-417
2022/23	217	805	-588
2021/22	562	805	-243
2020/21	179	805	-626
2019/20	14	805	-791
Total	1,873	4,830	-2,957
Average	312	805	39%

³⁸ Source: Mayor of London – London Datastore: <https://data.london.gov.uk/dataset/residential-completions-dashboard>

5 Year Housing Land Supply ('5YHLS')

- 6.24 The Council's Five-Year Housing Land Supply (June 2017) document³⁹ indicates more than five years but no figure is stated. A figure of 7.93 years is calculated based on the Council's stated supply and requirement figures, with a 5% buffer applied⁴⁰, however in a recent appeal decision (DCS 400-044-269) dated 5th February 2024, the Inspector found that the Council had indicated it could not demonstrate a five year housing land supply and therefore Framework paragraph 11(d) applies which states that planning permission should therefore be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 6.25 Given the lack of delivery, the time that has passed, and the application of the new standard method, we expect that the Council's housing land supply will have reduced further.

Housing Delivery Test ('HDT')

- 6.26 For the Council, the Housing Delivery Test results 2023 (up to March 2024, reported December 2024) are 143%, though declining delivery figures were reported for 2022/23.
- 6.27 A minimum of 1,609dpa were required over this period, and only 1,422dpa delivered (2022/23).

Current Housing Needs in Hammersmith & Fulham, The Standard Method

- 6.28 The Government recently published the revised standard method of housing need and deliver for the Council. This results in a new minimum annual mandate of 2,783 dwellings per annum ('dpa'). This requirement now applies now.
- 6.29 This is a 73% increase from the previous minimum (capacity) target of 1,609dpa of Table 4.1 within the London Plan (2021).
- 6.30 The needs identified by the London Plan Strategic Housing Market Assessment are around 25% greater than those allocated within the London Plan housing delivery targets informed by capacity. Accounting for this, delivery in LBHF over the last 10 years will still have fallen short of housing need.

Housing and Land Housing Research Note 10 (2023)

- 6.31 We also draw attention to recent evidence produced by the Greater London Authority Housing and Land team - the Housing and Land Housing Research Note 10 (2023). This concludes

³⁹ Source:

https://www.lbhf.gov.uk/sites/default/files/section_attachments/ex19_five_year_housing_supply_june_2017.pdf

⁴⁰ Source: The Housing Land Supply Index: June 2023 Update: [Link](#).

that there is a direct link between delivering new homes and reducing housing costs overall. We summarise the relevant conclusion below:

6.31.1 There is already evidence that increases in the supply of housing bear down on housing costs over the long term.

6.31.2 In general, building new market-rate homes makes other housing more affordable.

6.31.3 It does so by creating chains of vacancies and moves that can reach across an entire housing market area. These moving chains improve the availability and affordability of housing throughout the range of prices and rents, including for low income households.

6.31.4 Building market-rate housing therefore indirectly increases the availability of homes affordable to low-income households, although not as directly as building social housing and other kinds of affordable housing. New homes deliver improved choice and affordability for households beyond the immediate beneficiaries. The chains of moves initiated by new supply mean that one new home, even an expensive one, can improve the housing circumstances of several households.

6.32 Approval of this application will help deliver further housing in the borough and reduce housing costs overall.

7 The Application Documents

- 7.1 The application is supported by the following planning documents agreed with the Council through a Planning Performance Agreement.

Table 7.1 – Planning Application Document List

Application Document	Author
Application Forms	
Planning Application Forms including Certificate B	Quod
CIL Form and Covering Letter	Quod
Application Covering Letter	Quod
Design Principles	
Design and Access Statement	TP Bennett and Pick Everard
Landscape Statement	Exterior Architecture
Drawings and Accommodation Schedule	
Planning Application Boundary Plan – Location Plan	TP Bennett
Architectural Drawings	TP Bennett and Pick Everard
Landscape Drawings	Exterior Architecture
Accommodation Schedule	TP Bennett
Technical Assessments	
Daylight, Sunlight and Overshadowing Assessment	Point2
Noise Impact Assessment	Hoare Lea
Arboricultural Baseline Note	Tyler Grange
Biodiversity Net Gain Assessment	Greengage
Preliminary Ecological Appraisal and Preliminary Roost Assessment	Greengage
Bat Survey Report	Greengage
Preliminary Site Investigation	Soil Consultants
Preliminary Geoenvironmental Report	AP Geotechnics
Residential Travel Plan	Velocity
School Travel Plan	Velocity
Healthy Streets Transport Assessment	Velocity
Outline Delivery and Servicing Plan – Residential	Velocity
Outline Delivery and Servicing Plan - School	Velocity
Operational Waste Management Strategy	Velocity
Outline Site Waste Management Plan	Velocity

Application Document	Author
Air Quality Assessment	Hoare Lea
Air Quality Positive Statement	Hoare Lea
Outline Construction Logistics Plan	Velocity
Energy Strategy	Hoare Lea
Sustainability Statement incl. BREEAM	Hoare Lea
Whole Life Carbon Assessment	Hoare Lea
Circular Economy Statement	Hoare Lea
Flood Risk Assessment and Drainage Strategy	Waterman
Statement of Community Involvement	Kanda
Gateway 1 Fire Statement	FDS Consult UK
London Plan Fire Statement	FDS Consult UK
School Fire Safety Strategy Report	Osborn Associates
Pre-demolition Audit	Velocity
Pre-redevelopment Audit	Velocity
Planning Statement	Quod
Housing Statement	Quod
Health Impact Assessment	Quod
Equality Statement	Quod
Education Statement	Quod
Stage 1 Road Safety Audit	Velocity

- 7.2 The planning application is subject to the Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018. An Environmental Impact Assessment has been submitted and addresses the following environmental issues.

Environmental Impact Assessment Chapters	Title	Author
Volume 1		
Chapter 1	Introduction	Quod
Chapter 2	Site and Setting	
Chapter 3	EIA Methodology	
Chapter 4	Alternatives	
Chapter 5	Description of the Development	
Chapter 6	Demolition and Construction	
Chapter 7	Socio-Economics	Quod

Environmental Impact Assessment Chapters	Title	Author
Chapter 8	Transport	Velocity
Chapter 9	Noise and Vibration	Hoare Lea
Chapter 10	Climate Change	Ecolyse Limited
Chapter 12	Effect Interactions	Quod
Chapter 13	Summary of Mitigation, Monitoring and Residual Effects	Quod
Environmental Statement – Volume 2 Built Heritage, Townscape and Visual Impact Assessment (BHTVIA)		
Built Heritage, Townscape and Visual Impact Assessment inc. AVRs		The Townscape Consultancy
Environmental Statement – Volume 3 - Appendices		
Appendix 1.1: Statement of Competency	Various	
Appendix 3.1: Location of Specified Information in the ES		
Appendix 3.2: Scoping Report		
Appendix 3.3: Scoping Opinion		
Appendix 3.4: List of Cumulative Schemes		
Appendix 5.1: Planning Application Drawings		
Appendix 6.1: CEMP		
Appendix 7.1: Socio-economics		
Appendix 8.1: Construction Vehicle Routing		
Appendix 8.2: Construction Vehicle TFL CLP Output		
Appendix 9.1: Legislation Policy and Guidance		
Appendix 9.2: Noise Measurement Survey		
Appendix 9.3: Supplementary Construction Information		
Appendix 10.1: Climate Change		

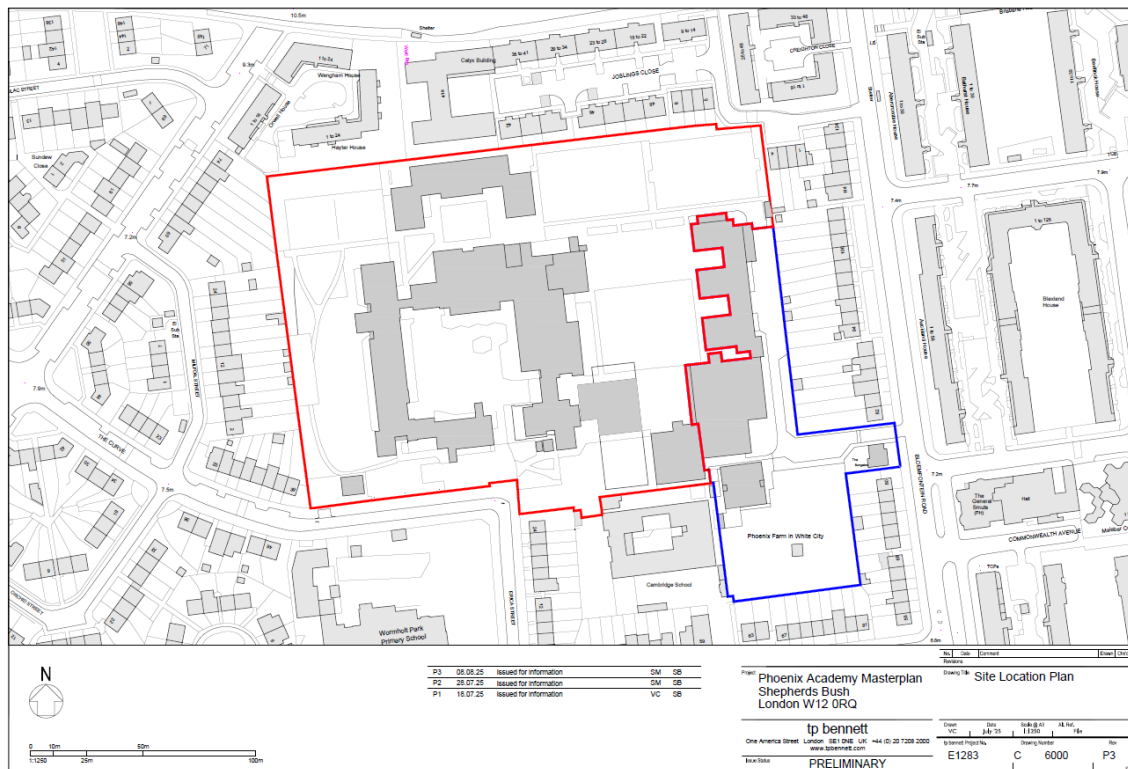
8 The Site & Surrounding Area

- 8.1 This chapter provides a brief description of the Site and its surrounding areas, including key features, designations and key sensitive receptor locations that may be affected by the Development.

Site Location and Extent

- 8.2 Wholly within the administrative boundary of LBHF, the Site, located at The Curve, London W12 0RQ, is to the north-west of Shepherds Bush, to the east of White City and to the south of the A40 (Westway), at Ordnance Survey (OS) National Grid Reference (NGR) TQ 22431 80816.
- 8.3 The Site covers an area of approximately 3.80 ha.
- 8.4 The application boundary is shown in Figure 8.1.

Figure 8.1: Site Boundary Plan

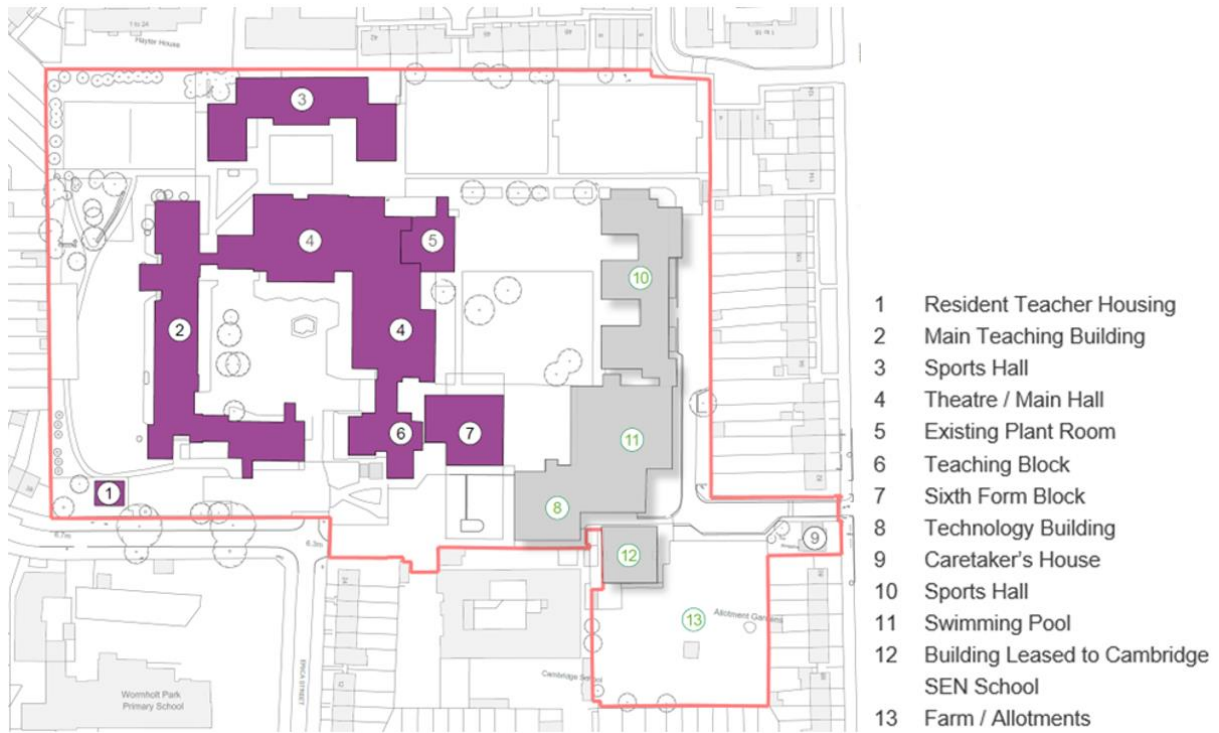


- 8.5 The Phoenix Academy comprises a number of school buildings of varying age and construction, hard and soft play areas, access, hardstanding, parking areas and landscaping. The main block located in the central and western portion of the Site comprises the west wing teaching building which is three storeys in height. The main block is adjoined via a bridge to the theatre and main hall, existing plant room and an additional teaching block with classroom and kitchen facilities, which occupies the centre of the Site. The north of the Site is occupied by the Sports Hall and outdoor sports courts. A one storey residential unit for staff purposes is

located in the south west corner of the Site. The eastern part of the Site is leased out to Phoenix Fitness Centre, sharing facilities with the Phoenix Academy, and is also used as a community and sports centre with allotments.

8.6 Figure 8.2 provides a plan presenting the existing education buildings in use by the Phoenix Academy.

Figure 8.2: Existing Buildings on-site



8.7 Table 8.1 provides the planning Use Class and floorspaces associated with the existing Site.

Table 8.1: Existing Planning Uses and Floorspaces on-site

Site Component	Existing Use Class	Area (sqm)
Phoenix Academy	Class F1: Learning and Non-Residential Institutions	14,222 (GIA)
Residential Unit for School Teacher Use	Class C3: Residential	148 (GIA)
Phoenix Fitness Centre	Class E(d) Indoor sport, recreation or fitness	2,458 (GEA)

8.8 The Site is generally flat and level, with ground levels varying between about +9.5mOD and +6.7mOD, with the exception of a central playground area which lies at between +5.5mOD and +5.7mOD. In terms of landscaping, the Site mainly comprises hardstanding, with some trees on-site and within the surroundings. There are strips of grass/scrub scattered within the Site in the school playground and along the perimeter of existing buildings. A number of trees are present within the Site including willow, apple, silver birch and other unidentified species, up

to 14m in height. Below the central portion of the Site, two deep Thames Water sewers are present which run north to south.

Buildings

- 8.9 The Site comprises the amalgamation of two former secondary schools, the capacity of which (12,378sqm (GIA)) is too large for an inner-city school, and the Academy does not currently use, nor need to use, all of the buildings onsite. It is too large for the current pupil number roll (of 560), and that forecast with growth (900). As a result, the western part of the site comprising land and buildings have been mothballed for a number of years, are obsolete and unused. This spare land has been identified for the enabling development of new homes.
- 8.10 For the buildings in use by the Academy, these are a series of interconnected buildings that were constructed between 1950's-2010's, are inefficient and spatially challenging. The building layouts and circulation routes can result in behavioural issues with many blind spots making management and surveillance difficult. The majority of the buildings are over 70 years old and are designed for a very different education pedagogy and do not comply with current educational building standards and do not allow for a full curriculum to be delivered.
- 8.11 There is also poor thermal and building fabric performance which results in overheating in summer and cold conditions in winter and high operation costs which diverts funding away from education. There is a need for consolidation of, and new, facilities on site.

Surrounding Area

Land Uses

- 8.12 The Site is located in an urban environment, with a mixture of surrounding uses including residential properties, community and leisure facilities, retail uses, hospital and medical uses and education facilities.
- 8.13 The Site is bound by low-rise residential properties in the north, beyond which is the A40 (Westway), the Wormholt Estate along the eastern edge, Wormholt Park Primary School and Cambridge School along the southern edge, and residential properties along the western edge.

Transport and Access

- 8.14 The Site is located in a Controlled Parking Zone V (Monday to Friday, 09:00 – 17:00hrs). Vehicular and pedestrian access to the Site is gained via The Curve and Erica Street.
- 8.15 Public transport access to the Site has a public transport accessibility level (PTAL) rating of 1a 1b. East Acton and White City Underground Stations are located approximately 650m and 750m to the north west and south east of the Site respectively. Both provide access to the Central Line. Wood Lane Underground Station is 750m to the south east of the Site and has access to both the Hammersmith and City Line and Circle Line. There are two bus routes within 100m of the Site. Phoenix High School Stop W is located an 8-minute walk from the Site on the Westway serving bus route 95 which provides regular services between Shepherds Bush and Southall. Commonwealth Avenue Stop LN serves bus route 283 and is a 4-minute walk from the Site, providing regular service between Hammersmith and East Acton.

Future Development

8.16 The Site is located within an area undergoing significant redevelopment and regeneration, in line with policy requirements. Noteworthy development in the area includes White City Central, and the Former Dairy Crest Site.

Precedent Development within the Borough

Avonmore School

8.17 The redevelopment of Avonmore Primary School represents a flagship project under the London Borough of Hammersmith & Fulham's Community Schools Programme, combining educational renewal with housing delivery. The scheme sets a precedent for integrated development that balances community benefit, sustainability, and urban regeneration.

8.18 The application, ref. 2023/03051/FR3, received resolution to grant at Planning Committee on 5th November 2024.

8.19 The approved application (Ref: 2023/03051/FR3) includes:

- Demolition of all existing buildings, including Gordon Cottage.
- Construction of:
 - A new primary school (Use Class F1).
 - A nursery (Use Class E(f)).
 - Two residential blocks (Use Class C3) comprising 91 units.
 - Associated playgrounds, cycle parking, and landscaping.

8.20 The new school will deliver modern, flexible learning environments; enhanced arts and digital technology facilities; and improved accessibility and community use.

8.21 This educational uplift is funded through the residential component. The residential element includes:

- 50% affordable housing, contributing to borough targets.
- 50% private units, generating capital for the school rebuild.

8.22 We note that the proposals for Avonmore School, which proposed 50% affordable housing, was submitted subject to its own viability challenges with a deficit of £12M to £24M *"Given the deficits, both schemes are technically unviable"*.

8.23 The proposal is supported by the injection of Right to Buy Funding (c. £9M) and favourable Council borrowing rates. *"As the project is being delivered under the Council delivery option, the Council considers that by applying their own internal performance metrics based on long term cashflow modelling will result in a viable and deliverable scheme"*.

9 Key Stakeholders and Pre-application Consultation

9.1 This section of the Statement considers the key stakeholders and the pre-application consultation undertaken during a 12-month period since 3rd September 2024.

9.2 We have divided our assessment under a number of sub-headings as follows:

- Future Academies
- London Square
- The Council
- The GLA
- Public Consultation

Future Academies

9.3 Future Academies is a family of schools located across London and Hertfordshire, committed to improving life chances and broadening the horizons of young people. Sponsored and guided by the founding charity, Future, the organisation's mission is to realise the motto *libertas per cultum* (freedom through education).

9.4 The vision is to ensure that every young person is equipped to lead a life full of choice and opportunity, with the ability to pursue a path they have actively selected.

9.5 Established in 2008 with the opening of Pimlico Academy, Future Academies has grown to encompass ten schools working collaboratively towards this goal. The trust is supported by an Ofsted-rated "Outstanding" SCITT, which trains over fifty teachers annually.

9.6 Over the past fifteen years, Future Academies has played a leading role in curriculum development, teacher training, and enrichment. The organisation maintains a strong record of achievement and remains focused on continuous improvement across all schools.

London Square

9.7 London Square is a specialist in developing homes that truly enhance the capital, delivering much needed high-quality housing and responding to the needs of the capital. London Square has completed 17 first class development sites in the capital and has a proven track record in delivering high-quality homes in places people love to live. More recently London Square obtained planning permission for the redevelopment of Greenwich Police Station, which is currently being built out.

9.8 London Square's award-winning approach to design has been recognised by the industry with numerous awards, including an impressive collection from WhatHouse, Evening Standard and RESI.

The Council

- 9.9 A Planning Performance Agreement (“PPA”) has been agreed with the Council and the Applicant, in accordance with NPPF paragraph 47.
- 9.10 The Applicant and the consultant team have held extensive formal pre-application meetings with LBHF planning, design, and housing officers – from September 2024 to January 2025.
- 9.11 From January 2025, the Applicant team then met with the Leader of the Council, Director of Planning, and the Director of Economic Development & Regeneration.
- 9.12 The Applicant also met formally with Council ward members and other councillors to present the emerging proposals.

Pre-application Consultation & Other Engagement Meetings

- 9.13 The Applicant has undertaken pre-application engagement with the Council since September 2024, which has contributed to the design evolution of the scheme, which through peer review and collaboration will deliver a high-quality development that will make a positive contribution to Hammersmith & Fulham.
- 9.14 Details of the pre-application engagement to date is set out in full within Table 9.1 below.

Table 9.1 – Schedule of Pre-application Meetings and Engagement

Pre-application Meetings and Other Engagement	
Date	Topic
3 rd September 2024	Re-introduction meeting with the London Borough of Hammersmith & Fulham (LBHF)
23 rd October 2024	LBHF Pre-application meeting No.2
8 th November 2024	LBHF Design Workshop No.1
13 th November 2024	LBHF Design Workshop No.2
19 th November 2024	TP Bennett and LBHF Design Discussion
20 th November 2024	Housing Meeting with LBHF
5 th December 2024	LBHF Pre-application meeting No.3
7 th January 2025	Environmental Impact Assessment Scoping Meeting with LBHF
28 th January 2025	Meeting with Cllr Stephen Cowan, Leader of the Council; Joanne Woodward, Director of Planning; and Matthew Rumble, Director of Economic Development & Regeneration
7 th March 2025	LBHF Pre-application meeting No.4
11 th March 2025	GLA Pre-application meeting No.1
16 th April 2025	Meeting with Cllr Stephen Cowan, Leader of the Council
23 rd April 2025	Imperial College London (LBHF) visit Phoenix Academy
29 th April 2025	Meeting with Cllr Stephen Cowan, Leader of the Council
6 th May 2025	Workshop with Matthew Rumble, Director of Economic Development & Regeneration
9 th July 2025	Public Consultation No.1
16 th July 2025	Public Consultation No.2
17 th July 2025	Meeting with Andy Slaughter – Labour MP for Hammersmith and Chiswick

Pre-application Meetings and Other Engagement	
Date	Topic
21 st July 2025	Meeting with Rupa Huq – Labour MP for Ealing Central and Acton
5 th August 2025	GLA Pre-application meeting No.2
6 th August 2025	Meeting with Matthew Rumble, Director of Economic Development & Regeneration and Wormholt Ward Councillors
6 th September 2025	Public Consultation No.3
17 th September 2025	LBHF Pre-application meeting No.5

9.15 The design of the development has evolved as a result of this engagement, and this is set out in detail within the Design & Access Statement.

The GLA

9.16 As the Application is referable to the Mayor of London under the Mayor of London Order 2010, the Applicant engaged with the Mayor of London's officers in respect of planning, housing, design, transport and sustainability and two meetings were held.

9.17 The Application presented the proposals to the GLA on 11th March 2025.

9.18 The GLA responded to the Applicant with written advice on 28th April 2025, supporting the proposals stating:

- GLA supports the principle of a residential-led redevelopment that enables upgraded educational facilities, despite the site not being allocated for such use.
- 37% affordable housing (by habitable room), all at social rent, is the preferred option and strongly supported under the Fast Track route.
- The net loss of education floorspace proposed is acceptable if no reduction in school capacity and justified as part of a wider education transformation strategy.
- Replacement facilities are considered well-designed and include enhanced sports/MUGA provision.
- General urban design principles supported.
- Car-free residential scheme supported.

9.19 The Applicant responded to the queries raised by GLA officers throughout the pre-application process and met with the GLA for a second time on 5th August 2025.

9.20 The GLA's written advice from this meeting is expected shortly after the application is submitted in September 2025.

9.21 As a result of this extensive and robust engagement during the pre-application stage, there is agreement between the Applicant and the Mayor of London on the principle of redeveloping the site, the overall quantum, and mix of housing and educational uses is in compliance with the adopted development plan when read as a whole.

9.22 No conflict has been raised with the NPPF.

Public Consultation

9.23 The Applicant appointed Kanda Consulting, a specialist public affairs and consultation company, to undertake stakeholder engagement and public consultation.

9.24 Whilst more detailed information on the specific methods of consultation and meetings that have taken place can be found in the Statement of Community Involvement, the consultation process included:

- On 25 June 2025, outreach letters were emailed to 16 key political and local community stakeholders, introducing Future Academies and London Square, sharing the details of the public consultation events and offering an opportunity to meet with the team.
- A dedicated project website was launched on 25 June 2025. The website provided information on the project team and proposals. It was updated on 9 July 2025 to align with the first public consultation event and included a copy of the consultation boards and Typeform survey through which visitors were encouraged to share feedback.
- On 27 June 2025, a flyer was sent to 4,233 addresses outlining the proposals and inviting neighbours to the public consultation events. Following the first consultation event, a second batch of flyers was distributed to 1,172 residents on Thursday 10 July 2025 to ensure they were aware of the second event.
- Across two sessions the consultation team hand delivered flyers to around 1000 close neighbours on Wednesday 2 July 2025 and Tuesday 15 July 2025, to ensure they were aware of the upcoming events.
- Public consultation events took place on Wednesday 9 July 2025 and Wednesday 16 July 2025 at the Phoenix Academy. Members of the public were provided the opportunity to find out more about the proposals, speak to members of the project team, and share their feedback on the plans. 89 local people attended across both drop-in events.
- A teacher preview event was hosted on Wednesday 16 July 2025 before the public consultation event. This provided an opportunity for teachers to review the plans. 30 teachers attended the session.
- 4 stakeholders meeting have been held with local political and community stakeholders.
- Following feedback from residents an additional public drop-in event was organised. A flyer was sent to 4,725 addresses on Saturday 16 August 2025 to invite them to the additional public drop-in event.
- The consultation team hand delivered additional flyers to around 200 close neighbours on Wednesday 3 September 2025 to ensure residents were aware of the additional drop-in event.
- The third public drop-in event was hosted on Saturday 6 September 2025 at Phoenix Academy. This allowed the team to respond to questions received from residents at the July events and provide an additional opportunity for residents and parents to meet with the team. 32 local people attended the event.

9.25 Throughout the consultation process, a telephone number and email address were supplied and managed by Kanda Consulting, providing further information to residents, businesses and stakeholders on request.

9.26 Full details are available within the submitted Statement of Community Involvement.

10 The Proposal

- 10.1 This section describes the proposed development and defines the principal components of the scheme.
- 10.2 The development directly responds to the development plan and planning policy guidance. The Site comprises a residential development that optimises housing delivery on brownfield land, and brings the educational uses up to modern standards.
- 10.3 The application is accompanied by a comprehensive set of visual and illustrative material prepared by TP Bennett and Pick Everard together with a Design & Access Statement.
- 10.4 The development comprises the following components:
- 4 new educational blocks up to a maximum height of 4 storeys.
 - Entry Block = 2 storeys (15.010 AODm (max.))
 - Teaching Block = 4 storeys (22.710 AODm (max.))
 - Sports Block = 3 storeys (18.610 AODm (max.))
 - Circulation Block = 5 storeys (25.710 AODm (max.))
 - 6 residential buildings up to a maximum height of 8 storeys.
 - Building A = 3 to 6 storeys (21.975 AODm (max.))
 - Building B = 4 to 6 storeys (21.975 AODm (max.))
 - Building C = 4 to 6 storeys (21.150 AODm (max.))
 - Building D = 4 to 6 storeys (28.500 AODm (max.))
 - Building E = 6 to 8 storeys (29.175 AODm (max.))
 - Building F = 6 to 8 storeys (29.175 AODm (max.))
 - 307 residential homes, of which:
 - 90 are affordable comprising 100% social rent units.
 - 37% Affordable Housing provision by habitable room (336 affordable habitable rooms).
 - 24% 3 and 4 bed provision (or 35% by habitable room) in total, with 3 and 4 bed provision included within the affordable tenure.
 - 2,992m² private residential amenity space
 - 4,724m² communal private residential amenity space; and 358m² of new public realm.
 - 1,768m² dedicated on-site playspace, comprising:
 - 0-4 years: 880m²
 - 5-11 years: 888m²
 - 0.41 Urban Greening Factor
 - 14.96% Biodiversity Net Gain Habitat Units; 15.98% Biodiversity Net Gain Hederow Units

- Car parking:
 - 3% car parking provision (10 Residential, 100% blue badge). 20% of the total accessible parking provision will be provided with Electric Vehicle (EV) Charging Facilities and the remaining parking bays will be provided with passive EV Charging Facilities.
 - 38 (incl. 4 accessible bays) car parking spaces for the school, a reduction of 30 parking bays
- Cycle parking:
 - School: 123 long stay and 9 short stay
 - Residential: 564 long-stay and 12 short-stay

New Educational Facilities

- 10.5 The most important consideration with respect to the redevelopment of the site is to ensure the provision of the best quality education facilities to serve the needs of the pupils, to provide local community access, opportunity and quality of facilities and landscaping on site.
- 10.6 In the context of the current Planned Admission Number (PAN) and the latest DfE BB103 design and space standards for secondary schools, the proposed retained educational land is comfortably large enough to accommodate a 5-form of entry school (750 pupils in Years 7-11) with a Sixth Form of a further 150 students, requiring accommodation for 900 students on the site, nearly double the existing figure.
- 10.7 The ambition is to develop modern, fit-for-purpose classrooms and sports facilities, including a new 3-court Sports Hall. The new buildings will adhere to the latest educational design guidance, with appropriate lighting, natural ventilation and sustainability credentials, alongside the incorporation of the more contemporary refurbished existing buildings.
- 10.8 The proposal is to demolish only the 1950s buildings, and to replace these with a new multi-storey teaching block of 4,435sqm which will run parallel to the more recently built and retained Vibe Building and Technology Building. These retained facilities will consist of approximately 3,656sqm creating an estimated overall of 8,091sqm (GIA) compliant with British standard requirements.
- 10.9 BB103 external standards will also be met for hard informal & social areas. The following spaces are provided:
- Hard informal & social area: 1,439m²
 - Hard outdoor PE: 2,101.57m²
 - Soft informal & social area: 3,056.30m²
 - Soft outdoor PE: 1,408.6m²
 - Habitat: 187.51m²
- 10.10 Further details are provided within Section 12 of this Statement.
- 10.11 Opportunities for the White City community exist with appropriate investment in young people and community use (weekend and evenings) of the new school buildings and leisure facilities

including a 3-court sports hall, new assembly hall and classrooms, together with Multi Use Games Area (MUGA).

New Homes

10.12 The Development proposes the following housing mix.

Table 10.1 – All homes

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%

10.13 The Development proposes the following market sale and affordable homes.

Table 10.2 – Market Sale and Affordable 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%

10.14 90% of the units are M4(2) compliant and 10% are M4(3)a 'Adaptable' wheelchair accessible standards (32 in total).

Greening and Amenity Space

10.15 The Development proposes the following private amenity space.

- 2,992m² private residential amenity space, including:
 - 1,682m² Balconies
 - 1,310m² Private Roof Terraces
- 4,724m² communal residential amenity space
- Total: 7,716m²

10.16 The Site will be curated with c.154 new trees, with 34 retained trees, and will create an urban greening factor of 0.41. It is proposed that there will be a biodiversity net gain of 14.96% Biodiversity Net Gain Habitat Units 15.98% Biodiversity Net Gain Hederow Units, far exceeding the 10% figure set out in the Environment Act 2021.

10.17 All play requirements for ages 0-4 year olds (725m²); 5-11 year olds (611m²) will be met on site. For 12-year olds requirement is 543m² and is provided off-site.

Table 10.3 Playspace Requirement and Provision

Age Profile	Playspace Requirement	Playspace Provision
Under 5 years	725m ²	880m ²
5-11 years	611m ²	888m ²
12-18 years	543m ²	Off-site
Total	1,879m ²	1,768m ²

Energy and Sustainability

10.18 The development seeks to support sustainable environmental objectives by taking steps to achieve reductions in energy consumption, carbon, water usage and waste production through the promotion of sustainable transport and the implementation of sustainable design methods.

10.19 The energy strategies for both the residential development and the education development have been defined following the 'Be Lean', 'Be Clean', and 'Be Green' energy hierarchy, in line with GLA and LBHF policy requirements. The Proposed Development adopts a 'Fabric First' strategy to reduce energy demand and CO₂ emissions at the Be Lean stage. In conjunction with high efficiency building services, this approach ensures compliance with the required performance targets., and results in a 18.21% carbon reduction (Be Lean).

10.20 It is proposed that all teaching spaces are served by local heating coil in the natural ventilation heat recovery units which are served by an ASHP. All other heated rooms will be served by radiators connected to an ASHP. The domestic hot water system will similarly be served by the ASHP. The analysis indicates that the estimated annual electricity generation from on-site solar photovoltaic panels is 24,813 kWh/year, with a panel area of 125 m² on roof of Sports Hall. This results in a 41.21% cumulative carbon reduction (Be Green).

10.21 In line with building regulations, the GLA policy requirements and the Department for Education construction frameworks, the residential and education buildings have been designed to minimise solar gains and mitigate overheating in summer months.

- 10.22 The residential buildings have been assessed using TM59 methodology in line with the requirements of Part O 2021 and GLA policy, and compliance has been demonstrated for passive iteration, and the mechanically ventilated iteration when including window closures for acoustic constraints.
- 10.23 Circular Economy and Whole Life Cycle Carbon principles have been adopted and incorporated by the development including the eventual choice of building materials, which where practical shall be locally sourced and selected on their environmental impact.

11 The Development Plan

- 11.1 This section provides commentary on the nature of the development in the context of strategic development, national, regional and local planning policy.
- 11.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that proposals shall be determined in accordance with the development plan unless material considerations indicate otherwise.
- 11.3 The development plan comprises the London Borough of Hammersmith & Fulham Local Plan (2018), Policies Map (2018), and the London Plan (2021).

Hammersmith & Fulham Local Plan (2018)

Education

- 11.4 The Council's educational policies are set out within Section 9 of the LBHF Local Plan (2018).
- 11.5 Local Plan Policy CF1 'Supporting community facilities and services' seeks the improvement and/or expansion of secondary schools across the borough. Supporting paragraph 9.5 of the Local Plan states that the Council's key educational priorities are to:
- Meet the Council's statutory responsibility to meet demand for school places;
 - Progress the schools of choice agenda for expansion of popular schools;
 - Increase the percentage of resident children choosing the borough's schools; and
 - Deliver the Special Schools Strategy.
- 11.6 Local Plan Policy CF2 'Enhancement and Retention of Community Uses' states that "*in any development proposal, existing community uses should be retained, enhanced or replaced, unless there is clear evidence that there is no longer an identified short or long term need for a particular facility or service, or where the existing facility or service can be appropriately replaced or provided elsewhere in the locality*".
- 11.7 In assessing need and viability, Local Plan Policy CF2 states that the Council will:
- Take into account the role the facility plays in the provision of space for community groups and whether the loss of such space would contribute to a shortfall in local provision; and
 - Require a viability report that demonstrates to the council's satisfaction that the facility or an alternative community use is not economically viable, including evidence of active and appropriate marketing for a continuous period of at least 12 months.
- 11.8 The Local Plan's glossary includes Education, including "Schools", as "Community facilities/uses".

New Homes

11.9 Delivering housing is a fundamental objective of the Local Plan.

11.10 Local Plan Policy HO1 'Housing Supply' states that the Council will seek to provide a minimum target of 1,031 additional dwellings a year up to 2035. The Council will seek to do this via the development of windfall sites and the change of use of the existing building where there is no reasonable prospect of that site being used for that purpose (amongst other mechanisms).

11.11 Local Plan Policy HO3 'Affordable Housing' advises where 11 or more self-contained dwellings are proposed, affordable housing should be provided in line with a 50% strategic target. Policy also stipulates that of this, 60% should be provided as social or affordable renting and 40% should be a range of intermediate products.

11.12 In negotiating affordable housing provision, the Council will take into account several factors including: Site size and site constraints; Financial viability; Individual circumstances and characteristics of the site; Site specific infrastructure; Availability of public subsidy; and CIL charge.

11.13 Local Plan Policy HO4 'Housing quality and density' expects housing in existing residential areas to be predominantly low to medium density and to consist of low to medium rise developments, it recognises that high density development may be appropriate in highly accessible areas, subject to design, compatibility with local contexts and transport impacts and highway capacity.

11.14 Local Plan Policy HO11 'Detailed Residential Standards' states several criteria which should be taken into account when ensuring that the design and quality of all new housing is of a high standard, meets the needs of future occupants and respects the principles of good neighbourliness.

11.15 There are various local policies relating to character and appearance, design, tall buildings and development within Conservation Areas which are to be read alongside London Plan Policy D9 Tall Buildings and Chapter 16 Conserving and enhancing the historic environment of the Framework.

11.16 Local Plan Policies DC1 and DC2 are particularly relevant to the assessment of design. Policy DC1 'Built Environment' states that all development within the borough should create a high-quality urban environment that respects and enhances its townscape context and heritage assets.

11.17 Policy DC2 'Design of New Build' and Policy DC3 'Tall Buildings' state that all new builds and tall buildings must be designed to respect good neighbourliness and the principles of residential amenity. Local Plan Policy DC2, at part E states that all proposals must be designed to respect good neighbourliness and the principles of residential amenity.

London Plan (2021)

11.18 The proposals accord with LP Policy GG2 (Making the Best Use of Land) which seeks to create successful, sustainable mixed-use places on brownfield land.

- 11.19 The Policy prioritises sites which are well-connected by existing or planned public transport⁴¹ and seeks to proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 11.20 LP GG4 (Delivering the Homes Londoners Need) aims to create a housing market that works and for those involved in planning and development 'must ensure that more homes are delivered'.
- 11.21 If London is to accommodate the growth identified in the Plan in an inclusive and responsible way, under LP Policy D3 (Optimising Capacity Through the Design Led Approach) the Mayor of London requires every new development to make the most efficient use of land by optimising site capacity. All development is expected to make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the Site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth. Higher density developments should be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, to achieve sustainable densities. Where these locations have existing areas of high-density buildings, expansion of the areas should be positively considered by Councils where appropriate. The principles of LP Policy D3 apply to Phoenix Academy.
- 11.22 The principal housing policy within the LP is Policy H1 (Increasing Housing Supply). It seeks to increase housing supply having identified a need for 66,000 additional homes per year. The Mayor recognises that development of this scale will require not just an increase in the number of homes approved but also a fundamental transformation in how new homes are delivered.

Loss/re-provision of education floorspace

- 11.23 Policy S1 of the London Plan sets out that development proposals that seek to make the best use of land, including the public-sector estate, should be encouraged and supported.
- 11.24 Policy S3 of the London Plan seeks to ensure that development proposals do not result in a net loss of education facilities, unless it can be demonstrated that there is no ongoing or future need.
- 11.25 The proposals involve the net loss of circa 4,380 sqm of education floorspace, with a number of existing school buildings being demolished and consolidated into the retained buildings and the new blocks.
- 11.26 It is considered that the redevelopment and replacement facilities represent a qualitative improvement over the existing provision, delivering modern, efficient, and fit-for-purpose educational accommodation. Although the proposals result in a net reduction in overall floorspace, the new layout and design ensure that the school's capacity and operational requirements are fully maintained. The loss of floorspace is therefore considered acceptable

⁴¹ London Plan Policy GG2 Making the best use of land (Part A&B)

given the significant enhancement to the quality of the education environment and the optimisation of space achieved through the redevelopment.

Conformity with the Development Plan

11.27 We consider that the proposal complies with LP Policy H1, GG2 and GG4, and the expectation of design led site optimisation at LP Policy D3. It complies with the locational requirements of LP Policy.

11.28 This development plan compliance weighs significantly in favour of the scheme, and these policies direct London Square to optimise the capacity of the Site for housing, and Future Academies to improve the educational facilities on-site.

12 Well Designed Places

12.1 Within this chapter we consider the development proposals against the national policy for well-designed places.

12.2 We have divided our assessment of well-designed places under the following sub-headings:

- The Framework and National Planning Guidance
- LP Design Policies
- Local Design Policies and Guidance
- Design Review
- Tall Buildings
- Housing Quality and Private Amenity Space
- Public Open Space
- Play Space
- Biodiversity and urban Greening
- Trees
- Heritage
- Daylight, Sunlight and Overshadowing

The Framework and National Planning Guidance

12.3 The Government's policies on design are set out at Chapter 12 of the Framework.

Framework Paragraph 139

12.4 Paragraph 139 of the Framework states significant weight should be given to:

development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

12.5 The application material identifies how the development reflects local design policies and government guidance on design, taking into account local design guidance and supplementary planning documents such as design guides and codes. The key design policies are set out in this chapter of the planning statement and the Design and Access Statement.

12.6 We also consider that the proposal comprises outstanding design which promotes high levels of sustainability and helps raise the standard of design more generally in an area, fitting in with the overall form and layout of their surroundings.

12.7 This proposal has had regard to the creation of high quality, beautiful and sustainable buildings and places. It is considered that the development will achieve the following key objectives because of the extensive pre-application consultation and evolution of the proposals for the following reasons.

- a) The Phoenix Academy development will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.
- b) The development is visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
- c) The development is sympathetic to local character, history and heritage assets, including the surrounding built environment and landscape setting, and does not prevent or discourage appropriate innovation or change (such as increased densities).
- d) Phoenix Academy is a prominent asset to the local community, and the proposed development establishes a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive place to live and learn.
- e) The development optimises the potential of the Site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) The development creates a place that is safe, inclusive and accessible and which promotes health and well-being, with a high standard of amenity for existing and future users.

12.8 Quod considers that outstanding design can comprise the following considerations which have been considered in detail as part of the application evolution. These comprise the following matters.

- Evolution of the scheme through stakeholder input.
- Collaboration on design with the Local Planning Authority; Mayor of London; and substantial agreement on many aspects of design.
- Optimisation of brownfield land
- No heritage impacts
- Compliance with the development plan; and design standards.

12.9 Collectively, we consider that the application can be considered outstanding.

[National Design Guide and National Model Design Code](#)

12.10 The design principles set out in the National Design Guide and National Model Design Code are reflected in this proposal. Whilst the application is designed in detail and would therefore not be subject to a design code which informs subsequent reserved matters, the design principles of the National Model Design Code have been adhered to.

12.11 The key principles of the National Design Guide are set out in the Design and Access Statement.

12.12 The National Design Guide (2021) addresses the question of how we recognise well designed places and we have considered the following key attributes of the guide as follows:

- **1. Context** - enhances the surroundings
- **2. Identity** - attractive and distinctive
- **3. Built form** - a coherent pattern of development
- **4. Movement** - accessible and easy to move around
- **5. Nature** - enhanced and optimised
- **6. Public spaces** - safe, social and inclusive
- **7. Uses** - mixed and integrated
- **8. Homes and buildings** - functional, healthy and sustainable
- **9. Resources** – efficient and resilient
- **10. Lifespan** - made to last

12.13 These characteristics are addressed throughout the DAS to demonstrate that our proposals represent an exemplar design proposal. We believe after taking each of these documents into consideration that we will have demonstrated general compliance with paragraph 139 of the NPPF. Our design delivers an outstanding design which promotes high levels of sustainability and helps to raise the standard of design more generally in the area, whilst respecting the existing surrounding context. The combination of these issues collectively provides a scheme which we consider to be of outstanding design and material quality, that will integrate with and enhance the quality and character of the surrounding neighbourhood.

LP Design Policies

12.14 We have also considered the design policies in the London Plan, and in particular:

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- Policy D1 London's form, character and capacity for growth
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D6 Housing quality and standards
- Policy D7 Accessible housing

- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire safety
- Policy D14 Noise

12.15 Policy D9 on tall buildings is considered in further detail within this Planning Statement.

Local Design Policies and Guidance

12.16 There are various local policies relating to character and appearance, design, tall buildings and development within Conservation Areas which are to be read alongside London Plan Policy D9 Tall Buildings¹⁶ and Chapter 16 Conserving and enhancing the historic environment of the Framework.

12.17 Local Plan Policy HO4 sets out that in existing residential areas, new housing will be expected to be predominately low to medium rise consisting of developments of houses, maisonettes and flats, and modern forms of the traditional mansion block.

12.18 Local Plan Policy DC2 states that new build development will be permitted if it is of a high standard of design and compatible with the scale and character of existing development and its setting. All proposals must be designed to respect:

- a) the historical context and townscape setting of the site, and its sense of place;*
- b) the scale, mass, form and grain of surrounding development and connections to it;*
- c) the relationship of the proposed development to the existing townscape, including the local street pattern, local landmarks and the skyline;*
- d) the local design context, including the prevailing rhythm and articulation of frontages, local building materials and colour, and locally distinctive architectural detailing, and thereby promote and reinforce local distinctiveness;*
- e) good neighbourliness and the principles of residential amenity;*
- f) the local landscape context and where appropriate should provide high quality landscaping and public realm with good permeability;*
- g) sustainability objectives; including adaptation to, and mitigation of, the effects of climate change;*
- h) the principles of accessible and inclusive design; and*
- i) principles of Secured by Design.*

12.19 Through the design evolution, we have also considered the Council's local design guidance, and in particular the following:

- Planning Guidance SPD (February 2018)
 - Chapter 3: Housing Standards
 - Chapter 4: Conservation Area Guidelines
 - Chapter 9: Accessible and Inclusive Design across the borough

- Chapter 10: Noise and Nuisance
- Chapter 11: Air Quality
- Chapter 12: Energy
- Chapter 14: Sustainable Drainage Systems (SuDs)
- Chapter 16: Biodiversity
- Chapter 17: Sustainable Design & Construction
- Chapter 18: Transport
- Chapter 19: Waste Management

Tall Buildings

National

12.20 The Framework does not make specific reference to the design of tall buildings, but Paragraph 130 (Chapter 12 – Achieving well designed places) is of relevance to height and massing, due to its requirements for overall quality and good architecture, the response to the local character and history of a site and establish a strong sense of place, as well as ensuring that proposals optimise the potential of sites to accommodate and sustain development and creating safe places.

12.21 Chapter 12 of the Framework is to be read alongside Chapter 5 (Delivering a sufficient supply of homes) and Chapter 11 (Making effective use of land).

Regional and Local

12.22 LP Policy D9 (Tall Buildings) provides the most up to date development plan policy framework for assessing the acceptability of a tall building proposal. It comprises four key components: Definition (A); Locations (B); Impacts (C); and Public Access (D) which we consider in detail below.

Context to LP Tall Building Policy

12.23 The London Plan⁴² recognises that “tall buildings can form part of a plan-led approach to facilitate regeneration opportunities and manage future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as its main centres of activity and important street junctions. Tall buildings that are of exemplary architectural quality, in the right place, can make a positive contribution to London’s cityscape, and many tall buildings have become a valued part of London’s identity.”

12.24 This supporting context to the application of Policy D9 is important as it provides a vital explanation of the broad principles which govern the plan led suitability for tall building locations

⁴² LP Paragraph 3.9.1

in the capital: - regeneration; growth; new homes; economic growth; optimal use of site capacity in well-connected locations; a tool for navigation; and an emphasis for place hierarchy.

12.25 These reflect good planning principles and a very detailed policy context which supports tall buildings at Phoenix Academy. All of the criteria referred to at LP paragraph 3.9.1 apply in this case.

12.26 London Plan Policy D9 comprises four key components: Definition (A); Locations (B); Impacts (C); and Public Access (D). We address each in turn below to determine whether, as a whole, the Application complies with London Plan Policy D9:

Policy LP D9: Part A

12.27 LP Policy D9 (A) requires Development Plans to define tall buildings, but these should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey (an equivalent of 7 storeys).

12.28 LBHF Local Plan defines a tall building as ‘those that are substantially taller than their neighbours and/or which significantly change the skyline’.

12.29 Policy DC1 ‘Built Environment’ 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 demonstrates how good design, quality public realm, landscaping, heritage assets and land use can be integrated to help regenerate places.

12.30 The proposed development will comprise tall buildings across the Site of varying heights. The Proposed Development for this Site includes buildings taller than 6+ storeys. The Application therefore proposes tall buildings across the Site.

Policy LP D9: Part B

12.31 LP Policy D9 (B) relates to locations of tall buildings and comprises three limbs.

12.32 The first two limbs require Boroughs to determine if there are locations where tall buildings may be an appropriate form of development. These locations and appropriate tall building heights should be identified on maps in Development Plans.

12.33 The third limb, Part B(3) states that tall buildings should only be developed in locations that are identified as suitable in development plans. Of note it does not say that they should only be developed at the heights prescribed in development plans. It should be noted that the LP Policy D9(3) does not operate as a bar to tall buildings being in differing locations provided that the balance of Policy D9 can be shown to be complied with, and exercising planning judgment in relation to the application in the round.

12.34 The site is not allocated for tall buildings, contrary to London Plan Policy D9 (Part B).

12.35 Although the site is not formally allocated for tall buildings under London Plan Policy D9 (Part B), its specific characteristics and planning context support the acceptability of taller development in this location. The Greater London Authority (GLA), in their response to the pre-

application meeting held on 11 March 2025, acknowledged that in principle the site could be appropriate for tall buildings. This position was informed by the presence of existing buildings on the site that exceed the height of the surrounding context, as well as the relatively open nature of the site and the generous separation distances to neighbouring built form.

12.36 The GLA stated, within their response to the GLA Pre-application response, dated 28th April 2025, that *“In principle, GLA officers consider the site could be appropriate to deliver tall buildings given there are currently buildings on the site which are taller than the surrounding context, and the relatively open nature of the site with good separation distances to surrounding built form.”*

12.37 Policy D9 is intended to guide the appropriate location and design of tall buildings, and while it identifies preferred areas for such development, it does not preclude the delivery of tall buildings outside of these locations where justified by site-specific circumstances. In this case, the proposal responds positively to the existing urban grain and demonstrates that height can be accommodated without resulting in harm to the surrounding townscape or amenity. The scheme also aligns with the wider strategic objectives of the London Plan, including the optimisation of land use, the delivery of high-quality design, and the provision of additional housing in accessible and sustainable locations.

12.38 Given the GLA’s supportive stance and the ability of the proposal to meet the broader criteria set out in Policy D9, the inclusion of tall buildings on this site is considered appropriate and justified.

Policy LP D9: Part C

12.39 LP Policy D9(C) considers the impacts of tall buildings and requires proposals to address visual impacts; functional impacts; environmental impacts; and cumulative impacts.

12.40 The qualitative assessment at Part C, in our opinion, introduces the necessary flexibility required by the Framework.

12.41 The Townscape Assessment submitted with the application has considered the Development within its urban context, including the buildings, the relationships between them, the different types of open spaces, including green spaces, and the relationships between buildings and open spaces.

12.42 The visual assessment has considered the impact of the Development upon visual receptors, i.e. people experiencing a change in views and visual amenity at different places, including publicly accessible locations. AVRs have been commissioned to illustrate the visual impact from strategically important viewpoints.

12.43 A full suite of associated environmental assessments is enclosed within the submitted EIA.

12.44 During the completed stage, the Development would result in several heritage, townscape, and visual benefits to the area. It would provide a new, modern school complex which complements the retained educational buildings and features high-quality landscaping for pupils. The proposed residential buildings are also of a high architectural quality, with detailing inspired by the surrounding Wormholt Estate.

Policy LP D9: Part D

- 12.45 LP Policy D9(D) encourages publicly accessible areas to be incorporated into tall buildings (at the top of buildings) where appropriate.
- 12.46 It would not be appropriate for the public to enter free of charge to a publicly accessible area at the top of a residential building due to security and management reasons.
- 12.47 It would also require additional floorspace to accommodate the viewing gallery reducing the overall housing provision in this highly sustainable location. We do not consider that it would be appropriate to allow public access.

Housing Quality and Private Amenity Space

LP

- 12.48 LP Policy D6 (Housing Quality and Standards) requires new residential development to be of high-quality design and provide adequately sized rooms, and comfortable and functional layouts.
- 12.49 Minimum internal space standards are set out in Table 3.1 of the London Plan, and key qualitative aspects including layout, orientation and form are set out in Table 3.2. The policy states that provision of dual aspect homes should be maximised where possible, and a single aspect dwelling should only be provided where it is considered a more appropriate design solution in order to optimise the site's capacity (in line with Policy D3). There is no policy which relates to the provision of units per core.
- 12.50 Where there are no higher local standards, Part 9 of LP Policy D6 requires a minimum of 5 sq.m. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.

LBHFLP

- 12.51 Key principle HS1 (Amenity Space) states the Council will expect to see a more generous provision of outdoor amenity space than the minimum provision standards in the London Plan.

The Proposed Development

- 12.52 The proposed development will provide adequately-sized homes compliant with minimum space standards as confirmed within the Design and Access Statement.
- 12.53 As a result of the proposed building typology, 55% of new homes will have a dual aspect. There are no single aspect north facing homes, and no three or four bed homes that are single aspect. Dual aspect homes have been maximised across the Site.
- 12.54 Each proposed floor will on average deliver 9 homes per core.
- 12.55 All homes will benefit from private amenity space demised to the apartment (e.g balconies, roof terraces and courtyard gardens) in accordance with the size requires of LP D6(9). These

will be at least 5sqm. The LP D6(9) requirement for amenity space is set out in Table 12.1 below.

Table 12.1 – Private Residential Amenity Space London Plan Requirements

Proposal Type	Amount
1-2 person dwellings (5m ² x 100)	500
3 person dwellings (6m ² x 3)	18
4 person dwellings (7m ² x 129)	903
5 person dwellings (8m ² x 35)	280
6 person dwellings (9m ² x 40)	360
Total	1,981m ²

12.56 The proposed private amenity space is set out below.

Table 12.2 – Proposed Private Residential Amenity Space

Proposal Type	Amount
Balconies	1,682m ²
Private Roof terraces	1,310m ²
Communal private residential gardens	4,724m ²
Total	7,716m ²

12.57 The proposed development adequately meets the requirements of LP D6(9), with Balconies and Private Roof terraces alone providing 2,992m².

12.58 The proposed development will be supported by an extensive array of public amenity space which we consider below.

Play Space

LP

12.59 LP Policy S4 (Play and Informal Recreation) seeks to ensure that development proposals include at least 10 sqm per child of suitable play provision. Further guidance is set out in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012).

LBHFLP

12.60 Policy OS3 (Play space for Children and Young People) states that proposals should not result in the loss of existing play space or the increased deficiency in the availability of such play space. It requires on well-designed provision of accessible, inclusive, safe and secure communal play space in new residential developments to cater to the needs of all children. The scale and nature of its provision should be proportionate to the scale and nature of the Proposed Development.

Requirement

12.61 For this development, the GLA Population Yield Calculator (v3.2), outlines that the development will generate a total child provision of circa 188 children.

Table 12.3 – Child Play Requirement

Age Profile	Child Yield	Playspace Requirement	Typology
Under 5 years	72.5	725m	Doorstep Playable Space (within 100m)
5-11 years	61.1	611m ²	Local Playable Space (within 400m)
12-18 years	54.3	543m ²	Neighbourhood Playable Space (within 800m)
Total	187.9	1,879m ²	-

The proposed development

12.62 The proposed development provides dedicated play space in line with LP policy S4 to meet this requirement, and this will be achieved on site.

12.63 The requirement for 1,336m² in total for 0-4 and 5-11 years has been met on-site; the development providing a total of 1,768m² of playspace. Further details of the design are included in the Design and Access Statement.

Table 12.4 – Residential Playspace (Proposed)

Age Profile	Proposed Play Area (m ²)
Under 5 years	880m ²
5-11 years	888m ²
12-18 years	Off-site
Total	1,768

12.64 The following assessment of the proposed school is based on the Building Bulletin 103: Area Guideline for Mainstream Schools (BB103) sets out simple non-statutory area guidelines for school buildings (Part A) and site (Part B) for all ages ranges 3-19.

12.65 Table 12.5 below sets out the BB103 Recommended sizes, and proposed area for Phoenix Academy as part of the proposed development.

Table 12.5 – School Area Assessment (Proposed)

	BB103 Recommended		Proposed (m ²)
	Min. (m ²)	Max. (m ²)	
Hard informal & social area	1,100	2,400	1,439.00

	BB103 Recommended		Proposed (m ²)
	Min. (m ²)	Max. (m ²)	
Hard outdoor PE	1,750	3,050	2,101.57
Soft informal & social area	2,400	3,700	3,056.30
Soft outdoor PE	37,500	40,800	1,408.6
Habitat	450	1,750	187.51

Biodiversity and Urban Greening

12.66 The Framework seeks positive improvements in the quality of the natural environment including achieving net gains for nature and biodiversity.

12.67 Policy G6 'Biodiversity and Access to Nature' of the LP states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.

12.68 LP Policy G5 (Urban Greening) requires urban greening as a fundamental element of development. It recommends a target Urban Greening Factor (UGF) score of 0.4 for developments that are predominately residential, noting that Boroughs can set their own targets. The policy requires that Urban Greening calculations to be submitted with planning application.

The proposed development

12.69 The proposed development is predicted to deliver a significant BNG due to the creation of medium distinctiveness habitats.

Table 12.6 – Biodiversity Net Gain and Urban Greening

	Habitat Units (HU)	Hedgerow Units (HeU)
Pre-development Baseline	6.54	0.62
10% BNG targets	7.19	0.68
Post Development	7.51	0.71
% Equivalent	14.96%	15.98%

Trees

12.70 Paragraph 131 of the Framework recognises that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. This development ensures that new streets are tree-lined, that opportunities have been taken to incorporate trees elsewhere into the development within the park and community garden area, and that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.

12.71 The development proposes 154 new trees and multi stem trees. There are 34 existing trees on-site which are to be retained.

Heritage

12.72 The Site is located within the Old Oak and Wormholt Conservation Area, designated on 21st May 1980. Adjacent, the Cambridge School is located in a locally listed Building of Merit.

12.73 The Old Oak and Wormholt Conservation Area Character Appraisal Character Profile (2018) assesses the Conservation Area in further detail (the 'CA Profile').

12.74 The Site is not within the Old Oak Estate, the Wormholt Estate (albeit this contains properties along the immediate western boundary), or Wormholt Park. It isn't immediately clear why the Site is designated within a conservation as it does not appear to contain any of the special characteristics that are described in Section 5 Character and Appearance of the Conservation Area (5.40), and the section on the Phoenix Academy Campus identifies "*little architectural or historical merit*".

12.75 The special architectural and historic interest of the Old Oak & Wormholt Conservation Area as a whole is derived from:

- the historic street pattern and the planned garden suburb layouts of the Old Oak and Wormholt Estates, which remain largely unchanged – *this will not be affected by the proposals.*
- the historical significance of the Old Oak and Wormholt Estates as an example of high quality planned early twentieth century public housing – *this will not be affected by the proposals.*
- the historical significance of the influence of the garden suburb movement, the 'Homes for Heroes' campaign and the 1919 Housing Act as evidenced by the development of the Old Oak and Wormholt Estates – *this will not be affected by the proposals.*
- the distinctive 'cottage garden' character and garden suburb architecture typified by the domestic scale of the housing, material palette, roofscapes; boundary treatments, and large planted front and rear gardens – *this will need to be considered in the 'setting' context and the process of managing change.*
- the character of a predominantly early twentieth century suburb and the mix of buildings and open spaces associated with that role – *this will need to be considered in the 'setting' context and the process of managing change.*
- the open character and soft landscaping of Wormholt Park – *this will not be affected by the proposals.*
- the high quality of the townscape and soft landscaping – *this will need to be considered in the 'setting' context and the process of managing change.*

12.76 The site is located within Sub Area 3 (Wormholt Estate) on its eastern edge. The defining characteristic of this area (5.98) is the "*communal gardens, lawns and verges that are arranged at street junctions*".

12.77 Properties within the Curve are assessed, albeit it is noted that:

5.156 Nos. 36-46 (even) are red brick, tiled roof flat fronted houses with a continuous string course below the first floor windows. Entrances are individual with canopies. Unfortunately, there has been some loss of multi-paned windows and hedges and some unsympathetic modern porches have been built.

12.78 The CA Profile contains a specific section on the 'Phoenix Academy Campus' and recognises the deficiencies of the existing buildings on site:

5.157 Although the Phoenix Academy Campus site is located within the Conservation Area, some of the buildings on the main school campus are tired and plain in appearance and have little architectural or historical merit. The buildings have a poor street presence and do not make any particular contribution to the appearance of the Conservation Area.

12.79 Targeted demolition of these buildings within the Conservation Area is not therefore expected to result in material harm and represent an opportunity for change and beneficial effects. The profile comments on the rest of the estate:

The site, initially forming two separate schools, comprises a cluster of post-war buildings grouped around a hard play courtyard area, with various separate buildings and areas of soft landscaping around the edges of the site. The main teaching block is the West Wing which is a 1950s/1970s part three, part four storey building to the west and south of the hard play courtyard. The Main Hall and East Wing located to the north and east of the hard play courtyard comprise a 1950s part two storey, part single storey block. The Hall has some character and architectural interest in its facade. The Reddaway Block, located to the south-east corner of the hard play courtyard is four storeys in height and has been refurbished. The distinctive form and colours of the recently completed Sixth Form Centre lifts the appearance of the site but would benefit from the relocation of the car park.

12.80 The applicant notes the comments regarding the car park and is looking at ways to improve the public realm in this location, as well as the wider opportunities that are identified.

The opportunity should be taken to provide a more active frontage to the site, create a legible entrance and welcoming reception area and improve visual and physical linkages to the potentially expanded area of the campus and surrounding area

12.81 The CA Profile (5.160) refers to the Council's adopted planning brief for the educational campus "Phoenix School Campus incorporating the Bryony Centre" (June 2009) which is available on the Council's website. We haven't been able to locate this, and it is unclear of the weight that can be attached to this document given its age, and change in circumstances since its adoption.

12.82 Section 7 of the CA Profile confirms (7.1) an analysis which has identified 25 key views which are described in the chapter and shown on the map below. The relevant views will be tested as part of the pre-application process. It isn't immediately clear that there are any identified views which the emerging proposals will be visible within except possibly view 1, 2 and 25.

Figure 12.1: Key Views in and around the Old Oak & Wormholt CA



Key map showing views in and around the Old Oak & Wormholt Conservation Area.

12.83 Overall, the design ambition for the Site does draw from the Old Oak and Wormholt Conservation Area qualities, specifically Sub-Area 3 Wormholt. Paragraph 5.98 positively refers to the defining characteristics of this area including communal gardens, lawns and verges that are arranged at street junctions. Paragraph 5.152 – 5.157 (The Curve) and 5.157 (Phoenix Academy) are also relevant supported by 6.1-6.15 Broad Design Principles; 6.4 (New development) and Chapter 7 Key Views (Views 1-4 etc).

Daylight, Sunlight and Overshadowing

12.84 Guidelines relating to daylight and sunlight are contained within the Building Research Establishment (BRE) Handbook – Site Layout Planning for Daylight and Sunlight (2022). This guidance includes discussion on how to protect the daylight and sunlight to existing buildings when new developments are proposed.

12.85 The Framework states that daylight and sunlight guidance should be applied flexibly ‘where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)’ (paragraph 130c).

12.86 LP Policy D6 (Housing Quality and Standards) states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. LP Policy D9 additionally states that sunlight penetration around tall buildings and their neighbourhoods must be carefully considered.

12.87 The Mayor’s Housing SPG 2016 makes clear that ‘an appropriate degree of flexibility’ should be applied when assessing the impacts of new development on surrounding properties and within developments. It is worth noting the following extracts from paragraphs 1.3.45-46:

...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. This should take in to account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.

The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.

The Proposed Development

- 12.88 Noting the above requirements, the effects of the proposed development on daylight, sunlight and overshadowing, both internally for future residents of the development and adjoining neighbours, is set out in the Daylight, Sunlight and Overshadowing analysis by Point2Surveyors.
- 12.89 The impacts on the neighbouring properties has been minimised with 86% of windows meeting the Vertical Sky Component (VSC) recommendations, 96% of rooms meeting the No Sky Line (NSL) criteria and 98% of southerly orientated rooms meeting the Annual Probable Sunlight Hours (APSH) criteria.
- 12.90 The vast majority of windows that fall short of guidance are overhung by existing architectural features (deep eaves, overhangs, access walkways and balconies) which limit the windows access to daylight. When the limiting effects of these features are hypothetically removed, the vast majority of windows would then meet the BRE recommendations suggesting it is the overhanging features rather than the size of the Proposed Development which is the main cause of the relative light loss.
- 12.91 Furthermore, it has been demonstrated that all neighbouring gardens and amenity spaces will meet guidance in respect of overshadowing.
- 12.92 The scheme has been designed to maximise the daylight levels across the scheme whilst still providing each unit with a private external amenity space in the form of balconies. 75% of rooms assessed will meet the climate based daylight modelling (CBDM) recommendations which, in Point 2's experience, is a high rate of compliance for a higher density scheme in areas undergoing regeneration. Where rooms do fall short of guidance, these would generally still receive levels commonly seen in higher density schemes or where there are some lower instances, these are located within the courtyard areas where access to daylight can be more limited within the pinch point areas.
- 12.93 In terms of overshadowing to the proposed amenity spaces, the courtyards and other external amenity areas would only be fractionally short of meeting the BRE recommendations, receiving 2 hours of direct sun to 48.7% of the area. Point2 have calculated that the spaces will meet the recommendations by March 23rd which is only 2 days later in the year so the external amenity areas should appear well sunlit as a whole, particularly for a higher density scheme such as this with courtyard (which can be challenging to receive good levels of sunlight for on March 21st).

13 Planning Considerations

13.1 This section considers the planning issues arising from the Planning Application.

Principles of development

School Development

13.2 Paragraph 95 of the NPPF highlights the importance of ensuring there is an adequate supply of school places to meet the needs of both existing and new communities. It makes clear that local planning authorities should attach significant weight to the need for creating, expanding, or adapting schools when preparing plans or determining planning applications.

13.3 London Plan Policy S3 requires that new development proposals safeguard against any net loss of education or childcare provision. Supporting text at paragraph 5.3.1 emphasises that access to high-quality education plays a crucial role in shaping life opportunities and is one of the strongest tools for reducing inequality and enhancing social mobility. Furthermore, paragraph 5.3.10 notes that the design quality of educational and childcare facilities is fundamental to establishing a positive learning environment.

13.4 Policy CF1 of the Local Plan seeks to enhance and expand school provision. The Council's key educational priorities are to:

- Meet the Council's statutory responsibility to meet demand for school places;
- Progress the schools of choice agenda for expansion of popular schools;
- Increase the percentage of resident children choosing the borough's schools; and
- Deliver the Special Schools Strategy.

13.5 Local Plan Policy CF2 'Enhancement and Retention of Community Uses' states that "*in any development proposal, existing community uses should be retained, enhanced or replaced, unless there is clear evidence that there is no longer an identified short or long term need for a particular facility or service, or where the existing facility or service can be appropriately replaced or provided elsewhere in the locality*".

13.6 The proposals would represent a transformation of the existing school which is at present does not offer its pupils the exemplary level of educational facilities which the Council aspires to deliver.

13.7 Provision of a new highly sustainable, energy efficient and accessible school, in harmony with the proposed residential development, would make better and effective use of brownfield land to deliver a proposal that would directly support the economic growth and competitiveness of the capital and support the regeneration of inner London generally. In doing so it can unlock social benefits and enable opportunities for environmental improvements.

Residential Development

- 13.8 Paragraph 8 of the NPPF establishes that a central element of sustainable development is its social dimension—supporting strong, vibrant, and healthy communities by ensuring that enough homes, of varying types, are provided to meet the needs of both current and future generations.
- 13.9 Paragraph 59 stresses that, in order to achieve the government’s ambition of substantially increasing housing supply, it is essential that sufficient land in suitable locations is brought forward.
- 13.10 Paragraph 118 advises that planning policies and decisions should encourage the redevelopment of underused land and buildings, particularly where this would contribute to meeting identified housing needs in areas where land supply is limited, and where existing sites could be used more efficiently.
- 13.11 Paragraph 121 states that local planning authorities should adopt a supportive stance towards applications proposing alternative uses of previously developed land not allocated for a specific purpose, provided these proposals help address identified development needs. Of particular note, it encourages schemes that make more efficient use of sites currently providing community services—such as schools—where this would maintain or enhance the quality of service delivery and access to open space.
- 13.12 The London Plan sets a challenging ten-year target of 16,090 new homes in the borough, equating to 1,609 per year. This marks an increase from the previous adopted London Plan requirement of 1,031 homes annually. Policy H1 states that, to achieve these targets, boroughs should optimise housing delivery on all appropriate and available brownfield sites.
- 13.13 Local Plan Policy HO1 commits the Council to exceeding the London Plan (2016) minimum target of 1,031 homes per year. With the updated London Plan (2021), the Council’s ambition should be raised to delivering 1,609 homes annually, an uplift of 578 homes.
- 13.14 The government has doubled the minimum housing delivery requirement for the Council against current London Plan targets from 1,609dpa to 2,783dpa.
- 13.15 The Proposed Development would make more efficient use of brownfield land by delivering new housing that supports London’s economic growth and competitiveness, while also contributing to wider regeneration across inner London. In doing so, the scheme would generate social value and create opportunities for environmental enhancement.
- 13.16 Crucially, the housing delivered on this site would also provide the funding necessary to enable the new facilities at Phoenix Academy.

Housing Delivery

- 13.17 Over the Local Plan period (2016 up to 2035) LBHF has a target to deliver 22,000 homes in the borough. LBHF has achieved its overall housing delivery targets for three out of nine years

over the plan period to date with 10,226 homes delivered between 2016/17 and 2024/25⁴³. This leaves a total of 11,774 (54% of the total) to be provided by 2034/35. As identified in the Local Plan, the borough's administrative boundary is constrained and there is limited available land within the urban area to accommodate future growth requirements.

- 13.18 The proposals for the Application Site present the opportunity to make a significant contribution to the Council's housing target by delivering 307 homes (C3 Use) on a central brownfield, underutilised site. Of the 307 homes, 90 homes will be affordable (100% social rent), supporting the those most in need in the borough, which can be delivered on a site where works can begin immediately, brought forward by the Applicant.

Housing Mix

- 13.19 The proposed housing mix is considered acceptable when assessed against the relevant policies of the London Plan and the Hammersmith & Fulham Local Plan. London Plan Policy H10 requires that residential schemes provide an appropriate mix of unit sizes having regard to local evidence of need, whilst also recognising the importance of smaller units in meeting the needs of single-person and couple households.

- 13.20 Similarly, Local Plan Policies HO1 and HO5 emphasise the need for housing provision to respond to the borough's demographic profile, which is characterised by a growing demand for smaller households alongside an ongoing requirement for family-sized affordable housing.

- 13.21 Policy HO5 'Housing Mix' states that developments should aim to meet the following mix subject to viability, locational characteristics and site constraints being considered on a site by site basis:

Table 13.1: LBHFLP Policy HO5 – Housing Mix

Tenure	No. of Bed	Percentage (of units)
Social Rent	1-bed	10%
	2-bed	40%
	3-bed	35%
	4-bed+	15%
Market	<i>"A mix of unit sizes including larger family accommodation"</i>	

Table 13.2: Proposed Unit Type Mix Range (C3 Use homes)

	1 Bed	2 Bed	3 Bed	4 Bed
Market	90	108	19	0
Social Rent	10	24	36	20

⁴³ Source: Mayor of London – London Datastore: <https://data.london.gov.uk/dataset/residential-completions-dashboard>

- 13.22 The proposed mix responds directly to this policy context. The majority of market housing is provided as one- and two-bedroom homes, while the mix secures a substantial level of family housing within the affordable element of the scheme.
- 13.23 A total of 56 three- and four-bedroom homes are proposed in the social rent tenure, representing over 60% of all affordable units.
- 13.24 The applicant has also sought specialist market advice over the pre-application period to ensure that the proposed mix strikes an appropriate balance between policy objectives and deliverability. The scheme therefore provides a composition of homes that is both supported by market evidence and consistent with the overarching aim of the London Plan and Local Plan to deliver housing which meets the full spectrum of local need.
- 13.25 Taken together, the proposed mix achieves an appropriate balance of smaller market units and larger affordable homes. It reflects local demographic projections, prioritises the delivery of affordable family accommodation, and responds positively to both London-wide and borough-specific policy objectives. The mix is therefore considered to be policy compliant and acceptable in planning terms.

Affordable housing provision

- 13.26 LP GG2 and LP Policy H4 (Delivery affordable housing) sets a strategic target for 50% of all new homes in London to be affordable. LP Policy H5 (Threshold approach to applications) applies a threshold level of threshold level of affordable housing on gross residential development.
- 13.27 LP Policy H5 confirms that fast tracked applications which meet the threshold are not required to provide a viability assessment at application stage.
- 13.28 LP Policy H10 (Housing Mix) considers that schemes should generally consist of a range of unit sizes. To inform the unit mix, applicants and decision-makers should have regard to robust local evidence on need; the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment; and the aim to optimise housing potential on sites. The Policy recognises that well-designed one- and two-bedroom homes in suitable locations can attract those wanting to downsize from their existing homes, and this ability to free up existing family stock should be considered when assessing the unit mix of a new build development.
- 13.29 The Application proposes 37% affordable homes (by habitable room) delivering 90 affordable homes across the proposed development. The affordable housing will be made up of entirely social rent homes in accordance with the GLA Accelerating Housing Delivery Planning and Housing Practice Note issued in December 2024. As set out within the note, the 37% affordable homes entirely as social rent is equivalent to 50% in a policy 60/40 social rent / intermediate split and is therefore fully policy compliant.
- 13.30 The affordable housing proposals will make a significant contribution towards meeting the Council's annual affordable housing requirements. As identified in Section 5, LBHF has consistently not met affordable housing targets and a step-change in the delivery of affordable homes is required to cater for the needs of the borough. The proposal for 90 affordable homes

by unit (336 by habitable rooms) presents the opportunity to deliver 10% of the Council's entire annual affordable housing target.

13.31 The Applicant is committed to meeting the needs of the local community and integrating the development proposals with the existing households around the site. Should the council wish, a Local Lettings arrangement could be worked up with LBHF, ensuring local people have priority for affordable homes. LBHF's standard nominations process will then apply enabling wider households to also benefit.

13.32 Achieving a policy compliant level of affordable homes and funding of new education buildings is financially challenging and has required extensive efforts by the Applicant (jointly London Square and Future Academies). The 37% social rent provision (equivalent to 50% in a policy tenure mix) is well above that secured in most schemes in London at present and can only be committed to with the benefits of a Fast Track planning permission (i.e. an Early Stage viability review is included but no mid or late stage reviews are required).

13.33 London Square, as the delivery partner of Future Academies, is one of London's largest developers with a track record in completing market and affordable homes. The land for the scheme is available and a phasing and construction plan has been worked through in detail with the Academy.

13.34 If approved, the borough can therefore be confident that the permission will translate to timely delivery of homes, playing a part in what has been fairly described as a crisis in under-delivery of housing in London.

Apartment Sizes & Accessibility

13.35 All units are compatible with lifetime home standards, with 10% designed for wheelchair accessibility. The development provides 3% disabled car parking spaces for residents. In addition, there is secure cycle parking for both resident's bicycles and visitors.

13.36 The apartments are a mix of 1 beds, 2 beds, 3 beds and 4 beds with a range of sizes all meeting the London Plan space standards, policy D6

- Studio, 37*-39m² (*with shower room)
- 1 Bedroom, 50m²
- 2 Bedroom, 61m² - 70m²
- 3 Bedroom, 86m²
- 4 Bedroom, 99m²

Accessibility

13.37 All homes will meet Building Regulations Standard M4(2) Accessible and Adaptable Dwellings. This means that the homes will be suitable for a variety of people to access and live in, including older people, those with reduced mobility and some wheelchair users.

13.38 10% of the homes will also meet Building Regulations Standard M4(3) Wheelchair User Dwellings. These homes will be fully accessible for wheelchair users and those with other mobility needs to live in

13.39 The Applicant will also work with LBHF's housing team and occupational therapists to ensure all social rent wheelchair homes are fully fitted out to the needs of the occupant.

Loss of Open Space

13.40 While the proposed development will result in the loss of existing open space within the Phoenix Academy site, this loss is considered acceptable in policy terms, as it is more than mitigated by the comprehensive benefits offered by the scheme.

13.41 The NPPF requires that existing open space (including playing fields) be protected unless the need for, and benefits of, the development clearly outweigh the loss, or replacement provision is made. The London Plan's Policy G4 similarly only permits the loss of open space where equivalent or better space is provided within the local catchment.

13.42 In this case, the development provides 307 new homes, 37% of which are affordable, together with new school facilities and open/play spaces that comply fully with London Plan and Hammersmith & Fulham standards.

13.43 The proposed school playing field(s), residential play areas and open spaces are designed to exceed the utility of what is lost in many respects (better layout, landscaping, safety, access). In addition, the scheme delivers improved urban greening, tree planting and public realm enhancements in line with London Plan Policy G5.

13.44 Furthermore, the social, educational and housing benefits of the scheme are substantial, addressing critical affordable housing need within the borough and improving education infrastructure.

13.45 Taken together, the replacement provision, improved quality and access, plus the public benefit, justify the loss of existing open space in this instance. The proposal is therefore compliant with the relevant policies in the NPPF, the London Plan (Policies G4, G5, G6), and Hammersmith & Fulham's Local Plan (2018).

Agent of Change Principles

13.46 Policy D13 of the London Plan sets out the Agent of Change principle, which requires that the responsibility for mitigating impacts from existing noise- and nuisance-generating uses falls on the proposed new development, rather than on the established activities. In practice, this means that new residential, mixed-use or other sensitive schemes coming forward near existing sources of noise, vibration, dust, or other operational impacts must be designed and delivered in a way that protects future occupants without placing unreasonable restrictions on the established uses.

13.47 The policy recognises that London is a dynamic, mixed and growing city where land uses are often located side by side. The onus is on the applicant to ensure that appropriate acoustic design, layout considerations, building fabric performance, and/or operational management

measures are incorporated at the planning stage to safeguard amenity while ensuring that existing uses are not compromised.

13.48 In relation to this proposal, the principle has been fully considered. The scheme has been assessed in terms of its proximity to neighbouring uses. Appropriate design and mitigation measures, such as building orientation and landscaped buffers are proposed to ensure that the development will not give rise to future conflicts between occupiers and surrounding uses.

13.49 Accordingly, the development is consistent with the objectives of Policy D13. It will deliver high-quality accommodation for future occupiers while respecting the established neighbouring uses.

Energy and Sustainability

13.50 The energy strategies for both the residential development and the education development have been defined following the 'Be Lean', 'Be Clean', and 'Be Green' energy hierarchy, in line with GLA and LBHF policy requirements. The Proposed Development adopts a 'Fabric First' strategy to reduce energy demand and CO₂ emissions at the Be Lean stage. In conjunction with high efficiency building services, this approach ensures compliance with the required performance targets., and results in a 18.21% carbon reduction (Be Lean).

13.51 It is proposed that all teaching spaces are served by local heating coil in the natural ventilation heat recovery units which are served by an ASHP. All other heated rooms will be served by radiators connected to an ASHP. The domestic hot water system will similarly be served by the ASHP. The analysis indicates that the estimated annual electricity generation from on-site solar photovoltaic panels is 24,813 kWh/year, with a panel area of 125 m² on roof of Sports Hall. This results in a 41.21% cumulative carbon reduction (Be Green).

13.52 In line with building regulations, the GLA policy requirements and the Department for Education construction frameworks, the residential and education buildings have been designed to minimise solar gains and mitigate overheating in summer months.

13.53 The residential buildings have been assessed using TM59 methodology in line with the requirements of Part O 2021 and GLA policy, and compliance has been demonstrated for passive iteration, and the mechanically ventilated iteration when including window closures for acoustic constraints.

13.54 The new development has a net annual emission of 8.38 tonnes of CO₂ per year. The cash in-lieu contribution to offset this CO₂ emissions offset is £23,883. This offset cost is calculated based on the GLA's recommended price of £95 per tonne of CO₂ over 30-years period.

Transport

13.55 When determining planning applications, the Framework states that development should only be refused on highways grounds where they would have an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (Paragraph 111). In demonstrating an acceptable impact, planning applications should be supported by a transport assessment that can outline any likely impacts of the proposal (Paragraph 113).

- 13.56 Similarly, Policy T4 'Assessing and Mitigating Transport Impacts' of the LP requires all development proposals to ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed via the submission of a Transport Assessment prepared in accordance with TfL's Transport Assessment Best Practice Guidance. The Policy also states that Transport Assessment should focus on embedding Health Streets Approach within, and in the vicinity of, new development.
- 13.57 At the local level, Policy T1 seeks to improve transportation 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.
- 13.58 The planning application is supported by a Residential Travel Plan (RTP) and School Travel Plan (STP) which will encourage sustainable and particularly active travel.
- 13.59 Policy T2 states that where development is anticipated to generate a level of trips that impacts on the local network, a Transport Assessment and Travel Plan should accompany the application. A Delivery and Servicing Management Plan should be secured and be coordinated with Travel Plans.
- 13.60 The Transport Assessment, prepared by Velocity, has been prepared in accordance with TfL's Healthy Streets TA Guidance. Impacts on the transport network at different scales have been assessed in this TA. The planning application is also supported by a RTP, STP, Residential Delivery and Servicing Management Plan and School Delivery and Servicing Management Plan.
- 13.61 Policy T3 seeks the encouragement of cycling by requiring new developments to provide cycle parking within the boundary of the site in line with London Plan minimum cycle parking standards. The development will provide high-quality cycle parking and supporting facilities in line with London Plan standards.
- 13.62 Policy T4 of the Local Plan requires car parking be provided in line with the London Plan standards and all new development be permit-free.
- 13.63 The proposed residential development will be car-free, with the provision of 3% disabled spaces on site only. The redevelopment of the Academy results in a reduction in car parking spaces from 68 spaces to 38 spaces.
- 13.64 The proposed residential development will be car-free, with the provision of 3% disabled spaces on site only. Dedicated blue badge parking will be provided for the Academy. This accords with Policy T5 of the Local Plan (2018).
- 13.65 Policy T6 states that development will not be permitted if it would prejudice the effectiveness of local access roads to provide safe and convenient access to individual properties or result in their use by through traffic. The development will have a net beneficial impact on the local highway network by providing a car-free residential development and reducing parking for the school. The new access has been designed in mind of best practice and audited.

14 Public Benefits and the Planning Balance

- 14.1 Within this statement, we explain why the proposal accords with relevant development plan policies, and the development plan when read as a whole. We also consider that the proposal accords with the Framework and is sustainable development within the meaning of the Framework.
- 14.2 As such, the proposal benefits from the statutory presumption as set out in Section 38(6) of the Planning and Compulsory Purchase Act 2024; Section 70(2) of the Town and Country Planning Act 1990 (“TCPA 1990”); and further to paragraph 11 c) of the Framework, it should be granted planning permission without delay.

Public Benefits

- 14.3 NPPG advises that public benefits may follow from many developments and could be anything that derives from paragraph 8 of the Framework.
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
 - c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 14.4 Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.
- 14.5 Benefits are a material consideration under 38(6); and case law and NPPG ties them into Framework Paragraph 8. Framework Paragraph 202 recognises that public benefits can outweigh less than substantial harm to the significance of a designated heritage asset.
- 14.6 Even if conflict was found with development plan policies, this conflict would need to be weighed in the planning balance against the public benefits of the proposal and material considerations.

Weighting of Material Considerations

14.7 Table 14.1 below records the relevant weight to be accorded to the various considerations to be weighed in the planning balance in determining whether permission ought to be granted for the Permitted Development. Where relevant to the Development, we have applied a judgement to the weight that should be applied.

Table 14.1 – Weighting of Planning Issues using the National Planning Framework

Issue	Framework Para	Framework Weight	Framework Quote	Application Judgement of Weight
Economic growth and productivity	85	Significant weight	“Significant <u>weight</u> should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”.	Significant weight
Suitable brownfield land for housing	124(c)	Substantial weight	“Give <u>substantial weight</u> to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land”.	Substantial weight
Design guides	134	Weight	“Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry <u>weight</u> in decision-making should be produced either as part of a plan or as supplementary planning documents”.	LBHF Local Plan & SPD (2018), less weight due to the age of the document
Design	139, (a) and (b)	Significant weight	“Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design (National Design Guide and National Model Design Code), taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, <u>significant weight</u> should be given to: a) development which reflects local design policies and government	Significant weight due to compliance and outstanding design

Issue	Framework Para	Framework Weight	Framework Quote	Application Judgement of Weight
			guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings."	
Heritage	212	Great weight	When considering the impact of a proposed development on the significance of a designated heritage asset, <u>great weight</u> should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.	Great weight is given to conservation, and in this case, the Development would result in several heritage, townscape, and visual benefits to the area.

Public Benefits of the Proposed Development, and the Weight to be Applied

14.8 We consider that there are very significant material considerations which weigh in favour of a grant of planning permission when undertaking a balanced planning judgement. We consider these below.

New Educational Facilities

14.9 The proposal would deliver high-quality educational facilities that respond directly to identified local need. The development will provide modern, flexible teaching spaces that are designed to meet current curriculum requirements and support a wide range of learning methods. These facilities will not only enhance the educational offer within the borough but also ensure that provision remains fit for purpose in the long term.

14.10 The introduction of new educational infrastructure is a significant public benefit. National and local planning policy consistently place substantial weight on the delivery of school places and the improvement of educational standards. The proposed development will directly contribute to meeting projected demand for school capacity in the area, thereby reducing pressure on existing schools and ensuring that families have access to high-quality education close to home.

14.11 In addition, the scheme has been designed to promote inclusivity and accessibility. The facilities will cater for a diverse student body and are aligned with best practice in creating safe, welcoming, and inspiring environments for learning. The improved educational environment is expected to deliver wider social and community benefits, supporting aspirations for social mobility and long-term economic growth.

14.12 On this basis, the provision of new educational facilities represents a very significant material consideration in favour of granting planning permission, in line with both local and national policy objectives.

Market Housing

14.13 The Council's Policy HO1 of its development plan seeks to provide a minimum target of 1,031 additional dwellings a year up to 2035. The Application delivers a significant quantum of new housing, including affordable homes and family sized units. This will result in a meaningful contribution towards the Borough's housing need and housing choice. The Application will deliver a total of 307 new homes, of which 217 homes will be available for sale.

14.14 The Framework applies significant weight to this public benefit, and we agree that significant weight should be applied to this aspect of the proposal.

Affordable Housing

14.15 The provision of affordable homes, and in particular London affordable rent homes will make a significant contribution to Hammersmith and Fulham's housing need.

14.16 37% (by habitable room) will be affordable homes. Of the 90 affordable homes proposed, 100% will be Social Rent.

14.17 This represents one of the largest contributions to affordable housing provision in the Borough.

14.18 The Framework applies significant weight to this public benefit, and we agree that significant weight should be applied to this aspect of the proposal.

Family Housing

14.19 The provision of affordable rent homes will make a significant contribution to LBHF's housing need with particular emphasis towards the larger family sized (three bedroom) units.

14.20 Of the affordable homes proposed, 75 homes will be 3 and 4 bed family homes meeting a borough wide need for family housing.

14.21 The Framework applies significant weight to this public benefit, and we agree that significant weight should be applied to this aspect of the proposal.

Design

School

14.22 The proposal delivers high-quality contemporary design that successfully responds to the townscape character of the local area.

- 14.23 The architecture of the Development aims to be contemporary yet contextual to the sensitive surroundings. Its layout responds directly to the school buildings which will remain just to the east of the Site. For this reason, the proposed school will be centred to the east of the Site, whilst the new residential buildings will be situated towards the west, where the existing school buildings will be retained.
- 14.24 It was decided that these two separate uses should be divided by a north-south axis, using the line of Erica Street to the south of the Site as a logical guide. This gives the Site a sense of integration between the Development and the surrounding streetscape.
- 14.25 Following further consideration and discussion with LBHF officers, the residential building was then split into two separate blocks, whilst the school to the east would be centred on a courtyard.
- 14.26 The proposed school building layout was then further influenced by environmental testing. For classrooms it is particularly important to be able to control the amount and quality of daylight into the space. For this reason, the proposed classrooms are oriented either to the north where light can be minimised, or to the south where light levels can be controlled via the addition of canopies or brise soleils.
- 14.27 The proposed school building has been designed to complement the existing school buildings which will remain within the School ownership. It is expressed as four blocks, reflecting the four internal uses of an entrance block, teaching block, sports block, and circulation block. This approach helps to reduce the bulk of the building. The layout of these proposed blocks allows for the creation of an enclosed central courtyard with high quality landscaping. It also utilises previously undeveloped space in order to make the school building footprint more efficient and accommodate more floor area.
- 14.28 The proposed education buildings aim to be more effective in layout than the existing Phoenix Academy which sprawls across the Site and leaves area of the Site underused.
- 14.29 The architecture of the proposed school aims to present a calm and refined building which does not compete with the more expressive architecture of the retained Vibe building. For the entrance block, this will be achieved via full height vertical glazed openings and a London stock brick façade. This helps to create a rhythm of 'solid' and 'void' which reduce the visual impact of the building from the nearby Conservation Area. The Development also creates a new entrance canopy which extends from the main entrance and announces the location of the school. This seeks to improve upon the current interface between the public realm and the school which is of a poor quality.
- 14.30 The scale of the Development has been carefully designed to acknowledge yet avoid competing with the height of surrounding buildings. The height and massing of the proposals have been modified throughout the pre-application process in response to through testing with Vu.City software.
- 14.31 The height and massing of the proposed school has been designed to complement the retained school buildings. The four blocks of the proposed building will reach 1.5 storeys, 4.5 storeys, 2 storeys, and 4 storeys each. They will therefore be consistent in height with the retained Vibe

building. The slight variation in height across the school will also help to create variety and interest in its visual appearance, breaking down the massing of the four respective blocks.

Residential

- 14.32 The proposed residential buildings seek to offer a contemporary response to the surrounding area, which is dominated by the ‘homes for heroes’ of the Wormholt Estate. To this end, it aims to provide a long-lasting scheme with a strong sense of place, which is well-integrated with the local community.
- 14.33 Residential units have also been deliberately placed along the main street within the Site Boundary to encourage a lively and inhabited public realm. This ‘Living Street’ also helps to improve permeability across the Site which is currently inaccessible
- 14.34 Inspiration for the design of the Development has been taken from the neighbouring ‘homes for heroes’ in the Wormholt Estate. The Architects have closely studied the local vernacular of the surrounding area, in particular the Wormholt Estate with its Arts & Crafts architectural style, communal gardens, and recessed porches with arched openings. This has been used as inspiration for the contemporary architectural detailing of the Development, which features archivolt archways which announce the main entrances to the residential blocks, and subtle changes to the brick pattern to give the impression of a cornice. As a result, the Development will be better integrated visually with the neighbouring ‘homes for heroes’ than the existing buildings on Site, which are in an overall poor condition.
- 14.35 In terms of layout, the residential buildings are broken down into a U-shaped block to the north and a C-shaped block to the south. This allows for the creation of two internal courtyards and communal space, with permeability throughout. These two larger buildings are further subdivided into two and four buildings respectively, within which the residential units are arranged. Each building has its own primary entrances, whilst any proposed ‘townhouse’ units also have their own private entrances. This aims to ensure that all buildings on site are safe, private, and secure whilst encouraging a sense of community and interaction between residents.
- 14.36 The proposed residential buildings have been carefully designed with the greatest height (of eight storeys) and massing focussed to the centre of the Site, mitigating the level of intervisibility of the higher elements from the surrounding area. This allows the Development to step down gently towards the ‘homes for heroes’ which neighbour the Site along the Curve. This variation in height and massing helps to create an interesting roofscape which contributes to a sense of architectural quality where it is visible in the surrounding area.

Air Quality Improvements

- 14.37 The Proposed Development is air quality neutral in regard to both building and transport emissions in line with the AQN LPG and as such no mitigation is required.
- 14.38 The qualitative site suitability assessment has shown that there are no exceedances of the annual mean NO₂, PM₁₀ and PM_{2.5} AQOs. Additionally, compliance with Part F of the Building Regulations (2021) is anticipated at the Proposed Development.

14.39 As demonstrated by the submitted Air Quality Assessment, it is considered that air quality should not be viewed as a constraint to planning and the Proposed Development conforms to the principles of National Planning Policy Framework, the London Plan and the Hammersmith and Fulham Local Plan.

Public Benefits Conclusion

14.40 These public benefits weigh heavily in favour of a grant of planning permission.

14.41 The benefits of the development are of a nature and scale to be of benefit to the public at large and deliver sustainable development and planning policy aims for economic, social and environmental development objectives. It will support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes are provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places. The proposal will protect and enhance the natural, built and historic environment whilst making effective use of land and using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Planning Balance

14.42 The proposals accord with relevant policies within the LBHF Local Plan when read as a whole which benefits from the same statutory presumption set out in section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 ("TCPA 1990"). Planning permission should therefore be granted.

14.43 Whilst there is a degree of conflict with LP Policy D9(B) in respect of building heights, when read as a whole, including compliance with LP Policy D9 Part A; and Part C which sets the criteria for assessing the acceptability of the impacts of tall buildings; and Part D, the Application complies with LP Policy D9 as a whole.

14.44 We have also explained why we consider that when read as whole, including policies in the LP and LBHFLP that we have identified, the Application site is a suitable location for a tall building.

14.45 Even if any non-conformity with LP Policy D9(B) were assumed to mean that the Application does not accord with LP Policy D9 when read as a whole (an approach that we do not agree with), it would still be necessary to consider this against compliance with the development plan as a whole. For the reasons that we have addressed, we consider the proposal would comply with the development plan as a whole.

14.46 Moreover, even if there were considered to be conflict with the development plan as a whole (which we do not consider to be the case), we consider that the compliance with policy that we have demonstrated, along with the public benefits that we set out in this section of the report would represent other material considerations demonstrating why planning permission should be granted in any event.

14.47 Further, as set out below, we consider that compliance with National Planning Policies set out in the Framework, carry significant weight, and individually and cumulatively are material considerations which would outweigh any conflict, if it existed due to the application of weight that the Framework advises should be awarded.

Summary

14.48 The public benefits arising from the proposals can be summarised below.

- Redevelopment on previously developed land, using surplus disused land for housing to fund new education infrastructure.
- Refurbished and new school buildings at Phoenix Academy enabling the school to support the White City community with appropriate investment in young people, and enable the teaching staff to deliver a first-class educational curriculum to local families and children.
- Opportunities for community use (weekend and evenings) of the new school buildings and leisure facilities including a 3-court sports hall, new assembly hall and classrooms, together with MUGA.
- New housing including affordable housing (rental and part-ownership).
- Additional public realm, including community gardens.
- Economic growth, and new jobs in the local area.
- Direct response to the Government's planning reform policies and the tilted balance in favour of planning permission.

15 Planning Obligations and CIL

15.1 In relation to planning obligations associated with development proposals, Regulation 122 (2) of the Community Infrastructure Levy Regulations states that:

“A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is:

a) Necessary to make the development acceptable in planning terms;

b) Directly related to the development; and

c) Fairly and reasonably related in scale and kind to the development.”

15.2 Paragraph 58 of the NPPF states that planning obligations must only be sought where they meet all of the tests outlined in Regulation 122 of the Community Infrastructure Regulations, as set out above.

CIL

15.3 LBHF adopted a CIL Charging Schedule in May 2015. The schedule allocates the borough into six charging zones; the Site is in the ‘North’ zone. In this charging zone, a CIL rate of £100/sqm applies to all new residential floorspace. Other uses proposed as part of this development are classified as ‘All other uses’, which have a Nil CIL rate.

15.4 In addition, the Mayor’s MCIL2 came into effect as of 1 April 2019. The MCIL2 Schedule allocated three ‘CIL Charging Bands’: Bands 1, 2 and 3. LBHF is in MCIL2 Charging Band 1 and as such MCIL2 is applicable to development at a rate of £80/sqm.

15.5 Relief is available on residential floorspace for affordable housing.

15.6 The proposed development will therefore give rise to separate Mayoral and Borough CIL charges that the Applicant will be liable for.

Draft Heads of Terms

15.7 It is anticipated that the s106 agreement will include the following items, in line with LBHF’s Local Plan Policy INFRA1 (Planning Contributions and Infrastructure Planning):

- Affordable Housing
- Residents and School Travel Plan
- Construction Travel Plan
- Car Permit Free
- Energy and Sustainability
- Skills and employment training and initiatives
- Monitoring costs

15.8 The applicant intends to discuss the Heads of Terms with the Council during the determination period.

16 Conclusions

- 16.1 Our report has considered the unique opportunity to regenerate unused land within an accessible location, with an exceptionally high-quality development to deliver substantial public benefits both for the London Borough of Hammersmith & Fulham, and strategically for London.
- 16.2 We have demonstrated that the Development responds directly to this opportunity by creating modern education floorspace, new market and affordable homes, new public realm and improvements to public transport on a sustainable brownfield site. The proposals would fulfil policy aspirations to create a new high quality urban development within this part of the Borough.
- 16.3 Future Academies and London Square have adopted a meticulous design-led approach to the redevelopment of the Site that responds to the Site's context and delivers a composition of individual buildings, set back from the surrounding road network, and elegantly proportioned taller buildings within the centre of the site, away from sensitive receptors.
- 16.4 When compared with the existing poor quality of the educational facilities on the Site and the amount of unused land, and the absolute policy imperative that it should be reused for housing, the case for the scheme is unequivocal.
- 16.5 The Application proposals accord with the Development Plan. Our assessment identifies that that each layer of planning policy confirms the need to achieve high quality growth and regeneration, i.e. at a national level, in London, in Hammersmith & Fulham and on this Site. The Application Site is a major development opportunity.
- 16.6 Policies also identify that regeneration should achieve important public benefits including, particularly, the improved quality of public realm, attractive design quality and respect for the amenity of others. The assessment demonstrates that each of these requirements has been met through the careful evolution and design of the application proposals.
- 16.7 In consideration of Section 38(6) of the Act, we can conclude that:
- The development accords with the LP and LBHF LP when read as a whole.
 - Taking the development plan as a whole, the proposals accord with the development plan, and having regard to all material planning considerations, should be approved.
- 16.8 In accordance with the terms of the Framework, the proposals should be approved. The proposals accord with the development plan and there are no material considerations which outweigh the presumption in favour of granting planning permission.