

# Whitchurch Playing Fields, Stanmore

in the London Borough of Harrow

planning application no. P/4910/15

## Strategic planning application stage 1 referral

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

## The proposal

The full planning application seeks permission for the development of an entirely new three-storey building for use as a free secondary school for 1,260 pupils aged between 11 and 18, including sixth form provision at Whitchurch Playing Fields.

## The applicant

The applicant is **Bowmer and Kirkland Ltd** on behalf of **Avanti House Free School Trust** and the architect is **Pick Everard**.

## Strategic issues

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

## Recommendation

That Harrow Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 70 of this report; but that the possible remedies set out in that paragraph of the report could address these deficiencies. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

## Context

1 On 16 November 2015 the Mayor of London received documents from Harrow Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 25 December 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

- Category 3C: "Development which is likely to prejudice the use as a playing field of more than 2 hectares of land which, (a) is used as a playing field at the time the relevant application for

*planning permission is made; or (b) has at any time in the five years before the making of the application been used as a playing field.”*

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

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

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

### Site description

5 The application site is within the London Borough of Harrow located at Whitchurch Playing Fields, which is designated as Local Open Space and Site of Importance for Nature Conservation (SINC), and extends approximately 10.5 hectares.

6 The site is almost entirely covered by grass, but with a derelict sports pavilion located towards the centre, which has been out of use for a number of years following fire damage. The site comprises three grass fields separated by tree belts, two of them have a number of formal and green pitches and the third is a field with a small watercourse along the boundary with the main playing field. There are also a small number of temporary type cabin accommodation units all of which are to be removed as part of any future development. Many of the trees are protected through Tree Preservation Orders, either as individual trees or groups.

7 The site is bounded by Wemborough Road to the south, Old Church Lane to the north, Marsh Lane and Green Verges to the East and Abercorn Road to the west. The surrounding area is predominately residential, with the North and East site boundaries directly adjoining residential properties. To the south-east is located the Whitchurch First and Junior Schools, for pupils up to the age of 11.



*Location of the application site: Source – applicant’s application document.*

8 A410 London Road, which forms part of the Strategic Road Network (SRN), is approximately 1 km north of the site. Bus route 186 serves stops on Wemborough Road, in addition, routes 79, 324 and 340 serve stops on Whitchurch Lane. Canons Park Underground station is approximately 1km west of the site and is served by frequent Jubilee Line services to Central London from Stanmore via Wembley Park. As such, the site records a moderate public transport access level (PTAL) of 3 out of a range from 1 to 6, where 1 is the lowest and 6b is the highest.

## Details of the proposal

9 The proposed development would provide an entirely new build secondary school, including sixth form provision. The school would be made up of a 6FE secondary for 900 pupils and 360 post 16, sixth form places. This detailed application is for a free school.

10 The school development will also include extensive new sports facilities to enable a range of sports to be played at the site by both pupils and the local community.

11 Avanti House School is a Hindu faith school, though the applicant has confirmed that its admission policy is inclusive and works collaboratively with the wider community, especially partner organisations, to prepare pupils from all walks of life as responsible citizens. The applicant has asserted that the overarching aim of the Avanti Trust is to house both the Avanti House Primary school and Avanti House Secondary School which are located at different sites in Harrow.

## Case history

12 A pre- application meeting on 19 March 2015 and a follow-up meeting on 30 June 2015 were held at City Hall, comprising the applicant and its consultants and the GLA officers and subsequently appropriate advice reports were issued.

## Strategic planning issues and relevant policies and guidance

13 The relevant issues and corresponding policies are as follows:

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

14 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plans in force for the 2012 Harrow Core Strategy and the 2015 London Plan (Consolidated with Alterations since 2011).

15 The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework, the Mayor's Social Infrastructure SPG (2015) and the Minor Alteration to the London Plan (MALP,2015), are also relevant material considerations.

## Land use principles; provision of education facility on open space/playing fields

16 In relation to the provision of educational facilities, policy 3.18 'Education facilities' of the London Plan states that "*Development proposals which enhance education and skills provision will be*

*supported, including new build, expansion of existing facilities or change of use to educational purposes”.*

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

18 The Mayor’s Social Infrastructure SPG provides guidance on planning for social infrastructure provision at strategic level starting with the GLA’s own demographic projections and the ways in which these can be used to understand need for health, education and sports facilities. It sets out that *“the Mayor is keen to support the development of free schools in London, not only through increasing provision of places in areas where there is unmet demand but also in driving up the quality of provision.”*

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

20 The application site is part of a larger area identified as a locally protected open space, playing fields and Site of Importance for Nature Conservation (SINC).

21 Educational need: A full assessment of the educational need has been submitted. The assessment cross referenced the Council’s Site Allocation & Area Action Plans, Policy Statement-planning for schools development published by the Department for Communities and Local Government; August 2011 (Appendix 3) and the cabinet paper from July 2015 prepared by Harrow Council’s Head of Community Services and included in the statement from the EFA at Appendix (4), in which the development of the proposed Avanti School is seen as a key element in addressing the Borough’s educational requirement between now and 2020. The Council has also provided informal advice as part of an iterative process.

22 Lack of alternative sites: The applicant has submitted a report on sequential assessment of alternative sites that can accommodate an all-through school educating children up until completion of KS5, a site which is also suitable, available and viable to accommodate the Avanti House School needs.

23 The sequential assessment report has demonstrated that Whitchurch Playing Fields is the only suitable and available location for the proposed development. All of the other assessed sites in the catchment area (over 50 sites in Harrow and nearly the same number of sites in Barnet) have failed to meet one or more of the primary site search criteria of availability, viability, size and location; even when assessed against the minimum requirements of the School (minimum school buildings floor space area of approximately 10,000sqm and a total site area of 8.7ha).

24 The report confirmed that Whitchurch Playing Fields site is the only site that has been identified as being large enough to accommodate a school of this size, located in the heart of the student-base and available to meet the time constraints of the already open school. Full feasibility and design development for the Whitchurch Playing Fields site demonstrated that a school could be delivered on part of the site and consequently, this is the only viable option for Avanti House Secondary School.

25 Playing fields: Policy 3.19 of the London Plan sets out that those proposals that increase or enhance the provision of sports and recreation facilities will be supported; whereas those that result in a net loss of sports and recreation facilities, including playing fields should be resisted. In this context, although the proposals are considered to enhance sports facilities and improve the waterlogged fields

qualitatively, the quantitative loss of the playing fields (15%) is a concern. However, the applicant has asserted that the playing fields do not meet an identified current or future demand as they stand. Furthermore, the applicant has confirmed that in addition to the main school educational facilities, a number of other facilities will be provided within a separate sports block and externally, that will be available to community groups and organisations outside of school core time during evenings, weekends and holiday periods. These include:

- 4 Court Sports Hall.
- Internal Changing Facilities.
- 2No Junior sized football pitches.
- 3No. Five-a-side pitches. Pitch to be fenced.
- 4 Tennis court sized MUGA. Courts to be fenced.

26 The main area of playing fields to the west of the Sports Hall will be retained and drainage will be improved. This will offer the potential at various times of the year to provide the following:

- 3No full sized football pitches.
- 2No junior sized football pitches.
- A 400m athletics track.
- Cricket Square.
- Artificial Cricket Practice Wicket.

27 Community use: The applicant has submitted a statement of Community Involvement which incorporated the results of extensive community consultation as part of the application documents. The applicant has stated that they have been in discussion with Sport England and it is understood that Sport England is resistant to any quantitative loss of playing fields.

28 Whilst the applicant acknowledges that there would be a quantitative loss in playing pitches, they assert that this needs to be viewed alongside the qualitative improvements. They argued that given the inclusion of the all-weather pitch, which offers the potential for more intensive usage than the natural turf pitches, there is arguably no actual loss in the sports potential of the site. To further ensure the local community, nearby schools and sports clubs have use of the proposed sports provision; a Community Use Agreement is proposed for out-of-school-hour usage of the site should consent for the development be secured.

29 GLA officers assessment on the land use principles and sequential assessment:

30 It is clear that a thorough and robust exercise has been carried out to investigate potential sites. However, at this stage GLA officers are not in a position to comment on the detailed assessment of each and every site or whether or not all potential sites have been considered. However, the fact that the analysis has taken into consideration the Council's Site Allocation & Area Action Plans and that the Council has provided informal advice as part of an iterative process, adds strength and robustness of the process. Given GLA's wider experience of similar exercises for schools and other inappropriate developments in designated Green Belt/MOL/Open Spaces, the sequential test exercise that has been carried out has an appropriate methodology and is suitably thorough and robust.

31 In conclusion, GLA officers accept the cases put forward by the applicant in particular the compelling local educational need and lack of alternative sites which have demonstrated that the proposed development on open space/playing fields is justified. It is also considered that although there is a loss of playing fields in quantity terms and due to this there is a strong objection by Sport England, the overall qualitative improvement to the playing fields and as detailed above the provision of varieties of sport facilities both for the proposed Free School and the communities in the area outweighs the loss and accords the London Plan (3.18E) which outlines the need for the maximisation of community use. That said, the negotiations with Sport England should be pursued further in order to address this fundamental objection to reach a suitable agreement.

32 Furthermore, the design and layout of the school development have been thought carefully to minimise as much as possible the visual impact of the development on the openness of the site (see design comments below). In this instance, the proposed school development on site, on balance, is accepted in strategic land use terms.

## **Biodiversity**

33 As part of the application site is designated as a Site of Importance for Nature Conservation (SINC), the majority of the application site itself is a high value for biodiversity, consisting largely of rough grassland which provides greater biodiversity value. In line with policy 7.19 of the London Plan the proposed development wherever possible, should make a positive contribution to the protection, enhancement, creation and management of biodiversity.

34 The applicant has submitted a report on biodiversity as part of the planning application which stated that the proposal will not adversely affect the Sites of Local Importance for Nature Conservation within the boundary line of the site. The Biodiversity Management Plan states the current habitats on site include scattered trees, amenity grassland, scrub, running water, hedgerow and broadleaved woodland. There are limited impacts of the proposed development and the retention of features with greater value, namely the majority of scattered semi-mature and mature trees including those within Edgware Brook at Whitchurch School SLINC.

35 The Management Plan proposes that the key existing features of ecological value will be retained, protected and enhanced, where practicable, and additional enhancements for the site will be incorporated within the scheme. This will be achieved through the retention of existing trees, replacement tree planting and native/wildlife attracting soft landscaping. The landscaping scheme will utilise native species of UK. In addition, the proposed pond will be designed to increase the site's biodiversity, benefitting invertebrates and amphibians. It will house a permanent area of standing water, with shelved sides down to a filled depth of approximately 1m. The shelved sides will provide various ecological niches for different floral and faunal species. The pond will be suitably lined to hold water. Native aquatic and marginal planting will be added to further enhance the pond for wildlife.

36 Whilst the above mitigation measure is welcomed, it should be conditioned.

## **Flooding**

37 Flood risk: A Flood Risk Assessment has been submitted. The FRA confirms that the 10ha site includes areas of Flood Zones 1, 2 and 3a. It states that all buildings will be located within Flood Zone 1 and that land uses within Flood Zone 3a will be outdoor open spaces. This approach is acceptable in terms of London Plan Policy 5:12.

39 Sustainable drainage: The site and the surrounding locality have a number of significant surface water flood risk areas, therefore the application of London Plan Policy 5:13 will be particularly important for this site. The FRA states that the site will attenuate rainwater on site up to the 1 in 100 year (+climate change) storm. This will be achieved by the use of an open channel/swale with a restricted discharge, dry pond and permeable surfaces. This approach is acceptable in terms of London Plan Policy 5:13 and should be secured via an appropriate planning condition to be discharged in consultation with LB Harrow Lead Local Flood Authority.

## **Urban design**

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

41 The applicant has submitted a design and access statement and there are no strategic design concerns as the applicant has followed the pre-application advice report issued earlier. This is welcomed.

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

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

### **Inclusive design**

44 The applicant has submitted a design and access statement that demonstrates the development complies with inclusive design policy 7.2 of the London Plan, Accessible London SPG and Building Bulletin 102 and 104.

45 The statement demonstrated that inclusiveness has been incorporated into all elements of the proposed school; the design has been developed to provide level access from the existing school to the new-build extension area. New areas will be designed to meet the latest Building Regulations - Part 'M', the Equality Act 2010 & BS 8300 therefore the following has been provided:

- Main entrances to provide a minimum of 1000mm clear opening at the doorway via a level threshold and graded approach shallower than 1 in 20 to avoid the need for handrails.
- All appropriate new doors wheelchair accessible.
- Dimensions of new spaces to include minimum manoeuvrability requirements for wheelchair users.
- Doors to have a door closer of a type that requires a maximum opening force of 30N at the leading edge.
- Doors to have vision panels which provide visibility from 500mm to 1500mm above the floor levels and including operating furniture that is easily reached and which provides a secure grip.
- New signage planned and designed to current best practice with reference to the Sign Design Guide (2000) and DRC (2004) 'Good Signs'.
- Lighting and colour and finishes schemes that follow 'best practice' with particular reference to the needs to those with visual impairment.
- Colour contrast in new areas to be 30 LRV point difference between the new key elements where appropriate, i.e. floors, doors, walls and handrails.
- The car parking will incorporate designated accessible parking spaces (5% of the total 69 spaces), will be properly lit, and have appropriate markings. All disabled bays across the scheme will be located in front of the main building entrances.
- Part P – Electrical Safety.

46 Whilst the above measures are welcomed and need to be secured, the applicant needs to clarify the type of lifts proposed. Usually passenger lifts are preferable than platform lifts, but if the latter is chosen justifications should be provided accompanied by details of specifications and management plan. It should be ensured that the lifts are a suitable size to accommodate a variety of potential users i.e. lift which incorporates the minimum dimensions may not be suitable in this situation; therefore, details of the specifications are vital.

## **Sustainable development**

### Energy efficiency standards

47 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include zoned mixed mode ventilation with heat recovery, low energy lighting and controls, weather compensator and variable speed pumps. The demand for cooling will be minimised through solar control glazing and thermal mass. No active cooling will be provided. Overheating modelling has been carried out in line with CIBSE TM52 and it was confirmed that all areas modelled are not at risk of overheating.

48 The applicant is claiming a reduction of 24 tonnes per annum (12.8%) in regulated CO<sub>2</sub> emissions compared to a 2013 Building Regulations compliant development; however the site wide emissions and savings should be provided in line with the GLA Guidance before the savings can be verified. The applicant must also provide the full BRUKL sheet including energy efficiency measures alone (i.e. excluding PV) to support the savings claimed.

### District heating

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

50 The applicant is proposing to install a site heat network connecting both buildings on site. Further information on the floor area and location of the energy centre should be provided.

### Combined Heat and Power (CHP)

51 Due to the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

### Renewable energy technologies

52 The applicant is proposing to install 220sqm of solar PV on the roof of the buildings. A roof plan should be provided showing where the PV will be located, their orientation and pitch. A reduction in regulated CO<sub>2</sub> emissions of 13.5 tonnes per annum (7.2%) is claimed through this third element of the energy hierarchy. The emissions and savings at this stage of the energy hierarchy should be provided in line with GLA Guidance.

53 The applicant should investigate the potential for inclusion of other renewable energy technologies in the building design in the interest of achieving the 35% carbon reduction target.

### Overall carbon savings

54 The carbon emissions and savings at each step of the energy hierarchy should be calculated and presented in line with GLA Guidance on preparing energy assessments to allow assessment of the development against policy 5.2 (<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>).

## **Transport for London's comments**

55 It is proposed that vehicular access to the school will be from Wemborough Road, utilising the existing priority junction arrangement. Delivery and servicing activities though will be restricted to times away from the start and finish of the school to minimise risk of conflicts with other road users, this should be included in the delivery & servicing plan (DSP). The proposal does not include any proposed access from Marsh Lane due to highway safety concerns; this is supported by TfL.

56 In line with London Plan policy 6.3, trip generation and modal split assessments were carried out, with the methodology considered acceptable. As a result, it is currently estimated that the school will generate 976 two-way person trips in the AM peak and 1,086 in the PM peak. This is broken down



into 212 car trips in the morning peak, 294 public transport trips and 150 on dedicated school bus services. TfL however requests that the mode share for public transport is further disaggregated into buses; tube and train allowing TfL to further assess the impact on each respective mode.

57 The applicant has also carried out a trip distribution exercise which identifies that up to 71% of the vehicular traffic generated by the proposal will access the site via the Marsh Lane/ Whitchurch Lane/Honey Pot Lane/ Wemborough Road signal controlled junction to the immediate east of the site.

58 The proposal includes 69 staff and visitor car parking spaces, including 5% wheelchair accessible bays along with 10% of the spaces being equipped with electric vehicle charging points. Although TfL believes there is scope to reduce this provision further, it represents a reduction from the 92 spaces originally tabled at pre-application stage, which is welcomed. The proposal does not include provision of a designated pick up/ drop off area, which could attract additional car trips and so this aspect is welcomed by TfL. Nevertheless, a site wide car parking management plan should be submitted for approval, secured by condition and implemented to manage and regulate the use of the car park along minimising any on street parking.

59 A brief assessment of walking and cycling conditions on key routes in the site vicinity has been supplied. However in view of the increase in walking trips likely to be generated, TfL would request a more thorough Pedestrian Environment Review System (PERS) audit to be carried out to identify the need for local improvements in more detail. Similarly, a comprehensive cycling level of service (CLOS) assessment of existing streets and junctions as well as identified cycle routes in the vicinity of the site, following the methodology explained in section 2.3.4 of London Cycling Design Standards (LCDS) chapter 2 should be provided. TfL recommends that Harrow Council considers the outcome of both audits and assessments and secures appropriate walking and cycle improvements where needed.

60 Following TfL's initial comments to Harrow Council on 25 November 2015, the applicant has submitted a supplementary document proposing an improvement to the Marsh Lane/ Whitchurch Lane/ Honey Pot Lane/ Wemborough Road junction referred to above. The proposal includes the provision of staggered signal controlled pedestrian crossings at the northern side of the junction, which aims to address the lack of such facility on this specific arm. While TfL is broadly supportive of new crossing facility to provide a safer walking environment for pupils, there could be impacts on the existing capacity of the junction which will be further reduced by additional vehicle trips generated by the school. As this is an important junction for buses, TfL therefore requests that the applicant submit further evidence to demonstrate that there will be no adverse impact on the safe operation of the junction or on bus journey times as a result of the proposed changes. All modelling carried out should be robust and in accordance with TfL's current traffic modelling guidance.

61 The applicant suggests that cyclists accessing the site will use the dedicated routes on Wemborough Road and alight before manoeuvring through the public car park to the south of the site. TfL is concerned about the practicality of this proposal; and strongly recommends that other design solutions should be considered to provide a more convenient but also safe access route for cyclists.

62 TfL is pleased that 173 long stay and 12 short stay cycle parking spaces will be provided within the boundary of the site to encourage local sustainable travel. This is in line with the cycle parking standards in the London Plan. However, the applicant needs to review the location of the cycle storage and identify an alternative location(s) that offer better access and security.

63 TfL understands that the current proposal is for a Free School and so TfL will not be seeking any financial contribution towards additional bus capacity although it is expected that bus service improvements will be needed to accommodate the additional demand. Nevertheless, TfL require the applicant to assess the quality and accessibility of bus stops in the vicinity of the school as part of the PERS audit; TfL may seek contributions to bring those facilities up to the recommended standards if needed.

64 A draft school travel plan has been included in the submission, and this is welcomed by TfL. In light of the site's access to public transport, TfL seeks more assertive targets to encourage the use of walking, cycling and public transport as the preferred modes of transport to minimise the impact on the

already congested highway network in peak times. In this context, the proposal to stagger starting/finishing time is also welcomed. The travel plan should be secured by condition/ s106 obligation; and be accredited by the TfL School Travel Plan Accreditation Scheme (STAR) in line with London plan policy 6.3.

65 In line with London Plan policy 6.14, TfL welcomes that a framework delivery and servicing plan (DSP) and a draft construction logistics plan (CLP) have been submitted. TfL therefore recommends that submission of the detailed DSP and CLP would be secured by conditions.

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

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

67 Harrow Council planning officers have yet to confirm their position.

### **Legal considerations**

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

### **Financial considerations**

69 There are no financial considerations at this stage.

### **Conclusion**

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

- **Principle of land use - provision of school on open space/playing fields:** The proposed free secondary school on the site is supported as the scheme not only contributes through increasing provision of places in areas where there is unmet demand, but also in driving up the quality of provision and choices for parents. The sequential test exercise that has been carried out has an appropriate methodology and is suitably thorough and robust.
- **Playing fields and community use:** The community use plan which makes available the new sport facilities in the school for community use outside the school's core hour is welcomed and should be secured. As the site is a designated playing field, the negotiations with Sport England should be continued in order to address the objection to and reach a suitable agreement.
- **Biodiversity:** The proposed mitigation measures are welcomed and need to be conditioned.
- **Urban design:** There are no strategic design concerns. However, the applicant is encouraged to explore the use of higher quality facing materials to the main school frontage. As a minimum, the Council should secure key details of the cladding system to ensure the best possible build quality is delivered and ease of maintenance is prioritised.

- **Access:** Whilst the proposed inclusive access measures are welcomed and need to be secured, the applicant is required to clarify on the type of lifts proposed.
- **Sustainable development/energy:** Site wide carbon emissions and savings and full BRUKL sheet including energy efficiency measures alone (i.e. excluding PV) to support the savings claimed should be provided. Further information is required on the floor area and location of the energy centre and a roof plan showing where the PV will be located, their orientation and pitch. The applicant should investigate the potential for inclusion of other renewable energy technologies in the building design in the interest of achieving the 35% carbon reduction target.
- **Flooding:** No strategic concerns. The approach to sustainable drainage is acceptable and should be secured via an appropriate planning condition to be discharged in consultation with LB Harrow Lead Local Flood Authority.
- **Transport:** The mode share for public transport should further disaggregated into buses; tube and train allowing TfL to further assess the impact on each respective mode. A site wide car parking management plan should be submitted for approval, secured by condition and implemented to manage and regulate the use of the car park along minimising any on street parking. A more thorough Pedestrian Environment Review System (PERS) audit should be carried out; further evidence to demonstrate that there will be no adverse impact on the safe operation of the junctions or on bus journey times as a result of the proposed changes of the staggered signal controlled pedestrian crossings required. The proposed cyclists' access to the site and the cycle parking locations should be revised. Improved travel plan, DSP & CLP should be submitted and secured through conditions.

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