

GREATER LONDON AUTHORITY

[REDACTED]
(By email)

Our Ref: MGLA151118-8159

6 December 2018

Dear [REDACTED]

Thank you for your further request for information which the GLA received on 14 November 2018. Your request has been dealt with under the Freedom of Information Act 2000.

You asked for:

...all opinions, correspondence, reports and meeting minutes that the GLA has issued, regarding IAG and the proposed major development (to build the IAG school on the Bowring site) to: the education department, ESFA, DfE, Greenwich council or any other bodies / representatives / contractors during the time period of 24th October 2018 to 14th November 2018

Please find attached the information that the GLA holds within scope of your request. Please note that some names and contact details of members of staff are exempt from disclosure under s.40 (Personal information) of the Freedom of Information Act. This information could potentially identify specific employees and as such constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely

Paul Robinson
Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

Paul Robinson

From: [REDACTED] [REDACTED] <[REDACTED]@tfl.gov.uk>
Sent: 31 October 2018 15:13
To: [REDACTED] [REDACTED]
Subject: RE: 4431 - Bowring Ground - International Academy Greenwich

No worries! If you need anything else just let me know.

From: [REDACTED] [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 31 October 2018 15:12
To: [REDACTED] [REDACTED]
Subject: RE: 4431 - Bowring Ground - International Academy Greenwich

No, the below is fine – thanks!

From: [REDACTED] [REDACTED] <[REDACTED]@tfl.gov.uk>
Sent: 31 October 2018 15:10
To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Subject: FW: 4431 - Bowring Ground - International Academy Greenwich

Afternoon [REDACTED]

Yes of course. Some initial thoughts are below:

- ☐ The initial comments do still stand and TfL are pleased to hear a number of the points have been taken on board to reduce the impact on the TLRN.
- ☐ The vehicle and main pedestrian access to the site is via the road running north from Eltham Road which is TLRN and does appear quite narrow so TfL support the applicants pursue to stagger school hours. To reduce congestion TfL would recommend the use of the potential of a secondary pedestrian and cycle access via a new footway/cycleway from Weigall Road through Weigall Sport Ground.
- ☐ Anticipated trip generation, analysis based on comparable sites, shows that the majority of trips to and from the site would likely be by foot or public transport (70% - 90%), with only 99 and 57 driver trips generated in the AM and PM respectively and TfL is pleased to see the assessment on the impact of the development on public transport capacity shows that the existing public transport links will not be adversely affected by the increased use to any significant degree.
- ☐ TfL supports the applicant has considered changing the design of the proposed crossing to a toucan crossing and would like to be updated on any further changes. This will give equal opportunity and safety to both pedestrians and cyclists, encouraging uptake of active modes.
- ☐ TfL recommends the applicant to produce a supplementary technical note or inclusion in the TA that will address the concerns raised by TfL about the site's compliance with Healthy Streets.

I can update the document and provide the above in a formal letter if necessary?

Thanks,

[REDACTED]

[REDACTED] [REDACTED]
Assistant Planner (East Area Team) | Spatial Planning
[REDACTED] | Email: [REDACTED]@tfl.gov.uk



From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 31 October 2018 09:27
To: [REDACTED]
Subject: RE: 4431 - Bowring Ground - International Academy Greenwich

Morning

We had a pre-app on this site in the middle of September. It was a follow-up, with the initial pre-app being held in December last year – I've attached the initial tfl feedback.

Are you able provide me with some commentary for my follow up note?

Thanks
[REDACTED]

From: [REDACTED] <[REDACTED]@tube.tfl.gov.uk>
Sent: 18 September 2018 09:09
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@tfl.gov.uk>; [REDACTED] <[REDACTED]@tfl.gov.uk>
Subject: RE: 4431 - Bowring Ground - International Academy Greenwich

Hi [REDACTED]

Our Assistant Planner - [REDACTED] - will attend the pre-app tomorrow and take over the case from [REDACTED]
Please can you forward any relevant documents if applicant has circulated anything.

Thanks,
[REDACTED]

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 17 September 2018 16:56
To: [REDACTED]
Subject: RE: 4431 - Bowring Ground - International Academy Greenwich

Hi [REDACTED]

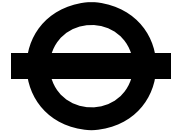
Just wondering whether anybody is able to attend this? I am being chased by the applicant so just want to let them know either way

Thanks!

From: [REDACTED]
Sent: 14 September 2018 11:27
To: [REDACTED] <[REDACTED]@tfl.gov.uk>
Subject: 4431 - Bowring Ground - International Academy Greenwich

Hi [REDACTED]

I have a follow up pre-app on Wednesday 19th 10 – 11:30 for a site in Lewisham where they propose a new secondary school. [REDACTED] was previously the case officer.



To: [REDACTED]

From: [REDACTED]
TfL Borough Planning
9th floor 5 Endeavour Square

GLA ref: 4431

TfL ref: 17/4702

Phone: 020 3054 7111

Date: 7th December 2017

International Academy of Greenwich – TfL comments

The new draft London Plan was published on 29 November 2017 and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. It is expected that all planning decisions within London should follow London Plan policies. As such, TfL will be expecting all new planning applications to look to be compliant with the policies as set out within the new draft London Plan.

Location

The site of the proposed new five form entry secondary school and sixth form is located within land to the north of Eltham Road. The site is bounded by Weigall Road Sports ground to the east, Quaggy River and Blackheath Park to the north and residential properties to the south and west. Access to the site will be from an existing priority junction along Eltham Road.

The Eltham Road, A20, forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN, and are therefore concerned about any proposal which may affect the performance and/or safety of the TLRN.

Public Transport Accessibility Levels

The site is located in between Blackheath and Lee Rail Stations, with both in the region of 1km away from the site. The two stations are served by South Eastern trains and offer frequent services towards Dartford, Crayford and London Charing Cross. Blackheath provides additional services to London Victoria, whilst Lee Station provides services to London Cannon Street.

There are four bus stops within 200m of the site, providing access to seven different services, namely the; 122, 178, 202, 261, 321, 621 and N21.

The site currently records a Public Transport Accessibility Level (PTAL) of 2 according to TfL's WEBCAT service, which is classified as having 'poor' accessibility by public transport.

Transport Assessment

The Transport Assessment (TA) to support the application should accord to TfL guidance. The TA guidance is available at:

<https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessment-introduction>

Car Parking

In the absence of specific car parking guidance in the current or draft London Plan for educational facilities the applicant should provide clear justification for proposed parking levels. The approach currently taken is to assume that car parking demand be 'scaled-up' from the existing sites modal split. TfL disagrees with this approach and the applicant should discourage car-use in favour of public and active transport modes. TfL would therefore recommend that the 22 car parking spaces be reduced as much as possible. A reduction in car parking provision is supported by Policy T2 Healthy Streets of the Draft London Plan, as this will improve the balance of space to give pupils, staff and other visitors to the site greater opportunities to dwell, walk and cycle. It will also make the entrance to site greener, safer and more pleasant.

The two disabled parking spaces should be retained through any changes to the design and the applicant should provide at least 20% of all spaces to be have active provision of Electrical Vehicle Charging Points in line with current London Plan Policy 6.13 Parking. However, TfL would encourage the applicant to look to provide all parking spaces with infrastructure for electric or other Ultra-Low Emission vehicles, to be in line with Policy T6 Car Parking of the Draft London Plan.

Walking and Cycling

TfL would encourage the applicant to consider changing the design of the proposed crossing to a toucan crossing. This will give equal opportunity and safety to both pedestrians and cyclists, encouraging uptake of active modes.

TfL would also request the applicant pursues a formalisation of the desire line that will be created by students approaching from the south of the site on Leyland Road and the location of the proposed crossing, making walking more convenient for students.

It was recommended that the applicant would produce a supplementary technical note or inclusion in the TA that will address the concerns raised by TfL about the site's compliance with Healthy Streets.

TfL would encourage the applicant to meet London Plan minimum cycle parking standards, as shown in Table 6.3 of current London Plan policy 6.9 and of Table 10.2 of draft London Plan policy T5. Given the educational use on site allow for appropriate levels of cycle parking spaces to be allocated to non-standard bikes and scooters. Changing and storage space for staff in line with London Plan standards and London Cycling Design Standards (LCDS) should also be provided.

Delivery and Servicing

In principle, TfL welcomes that the delivery and servicing is proposed to be contained within the site. However, to ensure that Eltham Road is not congested with traffic entering the single access road to the school, TfL requests that there should be a managed Delivery and Servicing Plan (DSP) in line with current London Plan Policy 6.11 and draft London Plan Policy T7.

Impact on TLRN

Due to the school generating student drop-off and pick-up, TfL would be concerned regarding the impact on the TLRN. The proposals for how this will be managed and the impact on the TLRN mitigated for should be included in the formal submission. The proposed crossing and its impact on the TLRN, will also have to be fully assessed by TfL, upon submission of the application. TfL would encourage the school to pursue a staggering of school hours, to lower the impact on the bus network.

Planning Documents

The application should be supported by a Travel Plan, Design and Access Statement, Construction Logistics Plan and a DSP. The Travel Plan, to cover both pupils and staff should be produced by the applicant as part of the submission should be in line with TfL's Transport Plan Guidance available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans>

Paul Robinson

From: [REDACTED]
Sent: 02 November 2018 14:26
To: [REDACTED]
Subject: Re: IAOG

[REDACTED]

I have finalised the report and just need to get the cover letter signed on Monday.

[REDACTED]

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From: [REDACTED] <[REDACTED]@eu.jll.com>
Sent: Friday, November 2, 2018 2:23 pm
To: [REDACTED]
Subject: RE: IAOG

[REDACTED]

Can you please provide an update on the formal response following our pre-app meeting on 19th September, as it has now been 6 weeks since the meeting.

Many thanks

[REDACTED]

[REDACTED]
Associate Director - Planning, Development & Heritage
JLL
30 Warwick Street London W1B 5NH

[REDACTED]
[eu.jll.com](mailto:[REDACTED]@eu.jll.com)
jll.co.uk/residential

From: [REDACTED]
Sent: 19 October 2018 10:23
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: IAOG

[REDACTED]

Are you able to provide an update on the formal response following our meeting on 19th September.

You advised that you would be able to provide it by mid-October.

Many thanks

[REDACTED]

From: [REDACTED]
Sent: 20 September 2018 17:55
To: [REDACTED] <[REDACTED][london.gov.uk](mailto:[REDACTED]@london.gov.uk)>
Subject: IAOG - Energy Info

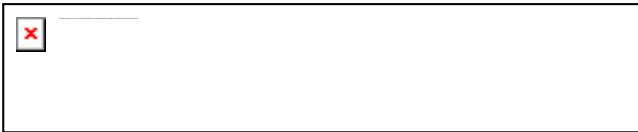
[REDACTED]

Following our meeting yesterday, please find attached a summary of the energy and sustainability measures for the proposals.

If you have any questions or require any further information please let me know.

Many thanks

[REDACTED]



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Paul Robinson

From: [REDACTED]
Sent: 07 November 2018 15:01
To: [REDACTED]
Subject: RE: GLA 4431 - Bowring Sports Ground (International Academy of Greenwich)

Hi [REDACTED]

Yes, see below. It's quite 'techy' so we don't tend to put these into the report. If you have any queries let me know,

Kind regards

Here are the pre-app energy comments for the International Academy Greenwich.

- The energy assessment planning guidance is available on the GLA website (March 2016). This provides further information on the revised targets to take into account Part L 2013 of the Building Regulations. It also provides details on the information that should be submitted within the energy statement to be submitted at stage 1. See link for the latest guidance published in March 2016: <https://www.london.gov.uk/WHAT-WE-DO/PLANNING/PLANNING-APPLICATIONS-AND-DECISIONS/PRE-PLANNING-APPLICATION-MEETING-SERVICE-0>
- The following targets are in effect for all Stage 1 schemes received by the Mayor from 1 October 2016 onwards, as set out in the revised energy assessment guidance:
 - Commercial/Non-domestic – 35% below Part L 2013
- The carbon emission figures will be reported against a Part L 2013 baseline. The applicant has committed to meeting Part L 2013 by efficiency measures alone. An anticipated performance of circa 10%-15% over a Part L 2013 compliant baseline is anticipated. The full BRUKL sheet including efficiency measures alone should be provided to support the savings claimed.
- Evidence will be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with Policy 5.9. Dynamic overheating modelling in line with CIBSE Guidance TM52 under all TM49 weather files will be undertaken. The applicant has stated that, it is likely that natural ventilation only will be able to maintain the appropriate internal conditions. This is welcomed. However, if cooling is proposed, an area weighted average for the actual and notion cooling demand should be provided and the applicant should demonstrate that the actual building's cooling demand is lower than the notional (MJ/m2).
- The applicant has investigated opportunities for connection to nearby district heating networks. The closest network is circa 1km from the proposed development and has no capacity. Evidence of this investigation should be provided as well as evidence of communication with the network operator.
- The site should be served by a single energy centre and the applicant should commit to providing a site wide heating network suitable for connection to wider district networks now or in the future. All uses on the site should be connected to the site wide heat network. A drawing/schematic indicating that all uses are connected to the sitewide network should be provided.
- A plan showing the size, internal layout and proposed location of the energy centre should be provided.
- The applicant should undertake a feasibility analysis for all feasible technologies for the site and promote the optimal solution. A CHP is not proposed due to the intermittent nature of the loads.

To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED]@london.gov.uk; Planning <Planning@london.gov.uk>
Subject: RE: GLA 4431 - Bowring Sports Ground (International Academy of Greenwich)

[REDACTED]

I just received the response, I don't think this is the correct response as it is identical to the previous response sent from our first meeting and does not address the new scheme? The only difference is the first page.

Could you come back to me on this?

Thanks

[REDACTED]

[REDACTED]
Associate Director - Planning, Development & Heritage
JLL
30 Warwick Street London W1B 5NH

[REDACTED]
[REDACTED]@eu.jll.com
jll.co.uk/residential

From: Pre-applications@london.gov.uk [mailto:Pre-applications@london.gov.uk]
Sent: 07 November 2018 11:28
To: [REDACTED] <[REDACTED]@eu.jll.com>; [REDACTED]@london.gov.uk;
[REDACTED]@london.gov.uk; [REDACTED]@london.gov.uk; [REDACTED]@tfl.gov.uk; spatialplanning@tfl.gov.uk;
[REDACTED]@tfl.gov.uk; [REDACTED]@tfl.gov.uk
Cc: [REDACTED]@london.gov.uk; planning@london.gov.uk; Pre-applications@london.gov.uk
Subject: [EXTERNAL] GLA 4431 - Bowring Sports Ground (International Academy of Greenwich)


Dear all

Please find attached a copy of the Pre-application meeting response letter relating to the above site in the London Borough of Greenwich .

Kind regards

[REDACTED]
Planning Support Team
Development, Enterprise & Environment
Greater London Authority
City Hall, The Queens Walk, London SE1 2AA
[REDACTED]

GREATER **LONDON** AUTHORITY


JLL,
30 Warwick Street,
London,
W1B 5NH

Our ref: GLA/4431/VH02
Date: 5 November 2018

Dear 

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

Site: Bowring Sports Ground (International Academy of Greenwich)

LB: Greenwich

Our reference: GLA/4431/VH02

Further to the follow up pre-planning application meeting held on 18 September 2018, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely


Head of Development Management

cc 

2 November 2018

International Academy of Greenwich

In the Royal Borough of Greenwich**The proposal**

Development of a new Free School for a new 765 place Secondary School and Sixth Form Centre.

The applicant

The applicant is **Education and Skills Funding Agency** and the architect is **Architecture Initiative**.

Context

1 On 20 September 2018 a follow-up pre-planning application meeting to discuss the above proposal for the above site was held at City Hall, with the following attendees:

GLA Group:	<div>██████</div> <div>██████</div> <div>██████</div>	Senior Strategic Planner, Case Officer Senior Strategic Planner, Design Officer TfL
LPA:	<div>██████████</div>	LB Tower Hamlets
Applicant:	<div>██████████</div> <div>██████</div> <div>██████████</div> <div>██████████</div> <div>██████████████████</div> <div>██████</div>	JLL (planning) JLL (planning) Robert West (Transport) Architecture Initiative (architect) Education and Skills Funding Agency Wynn Williams (Landscape)

2 The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

Site description

3 The site lies within the Bowring Group Sports Ground, north of Eltham Road. It is designated as Metropolitan Open Land (MOL). It is bound to the south by residential estates, to the east by Weigall Road Sports Ground and to the north by the park and the River Quaggy, a tributary of the River Ravensbourne. At present, the site houses a sports pavilion and some hard landscaping in the southernmost part.

4 The site lies on the western boundary of the Royal Borough of Greenwich, and the London Borough of Lewisham lies on the south side of Eltham Road. The school's catchment area is likely to span the two boroughs.

5 The site is located in between Blackheath and Lee Rail Stations. Both stations are approximately 1 kilometre away from the site and are served by South Eastern trains offering frequent services towards Dartford, Crayford and London Charing Cross. Blackheath provides additional services to London Victoria, whilst Lee Station provides services to London Cannon Street. There are four bus stops within 200 metres of the site, providing access to seven different services. Despite proximity to the bus services, the site has a PTAL rating of 2 (poor), on a scale of 0 to 6b, where 6b is excellent.

Details of the proposal

6 It is proposed to demolish the existing pavilion building, outhouse and flood defence wall and develop a school on the site, behind a new, partially-relocated flood defence wall. It is also proposed to create a two or three court Multi Use Games Area (MUGA). Internally, the proposals include a sports hall, theatre, science labs, classrooms, drama studio and sixth form facilities. The school would have capacity for 765 pupils, from years 7 to 13, and would offer the International Baccalurete (hence, the school's name).

Strategic planning issues and relevant policies and guidance

7 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises Greenwich Core Strategy (2014) and Site Allocations (Local Plan) (consultation draft, February 2016) and the 2016 London Plan (Consolidated with Alterations since 2011).

8 The following are relevant material considerations:

- National Planning Policy Framework (revised draft 2018);
- National Planning Policy Guidance; and
- Draft London Plan (consultation draft, December 2017)

9 The relevant strategic issues and corresponding policies are as follows:

- | | |
|---------------------------|---|
| • Metropolitan Open Land | <i>London Plan;</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG.</i> |
| • Inclusive design | <i>London Plan; Accessible London: achieving an inclusive environment SPG.</i> |
| • Sustainable development | <i>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.</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG.</i> |

Summary of meeting discussion

10 Following a presentation of the revisions to the proposed scheme from the applicant team, the meeting discussions covered strategic issues with respect to the following: principle of development; urban design; and transport. GLA officer advice in respect of these issues is set out within the sections that follow.

Principle of development

Metropolitan Open Land

Policy update

11 The full policy position with regard to development on Metropolitan Open Land is set out in the initial pre-application advice, dated 10 January 2018, and this pre-application response should be read alongside the initial advice note. It is noted, however, that the revised NPPF has been published since initial advice note was issued; therefore, the below text updates the policy references, with the initial advice note providing the bulk of the commentary on this.

12 Within the revised NPPF, chapter 13 is entitled 'Protecting Green Belt land' and the majority of the chapter remains as per the 2012 version. Paragraph 133 reaffirms that the fundamental characteristic of the Green Belt is its openness and its permeance, and paragraph 143 states that inappropriate development is, by definition, harmful to MOL and should not be approved except in 'very special circumstances'. When determining applications, LPAs should ensure that substantial weight is given to any harm to the Green Belt; 'very special circumstances' will not exist unless the potential harm to MOL by reason of inappropriateness, or any other harm, is clearly outweighed by other considerations.

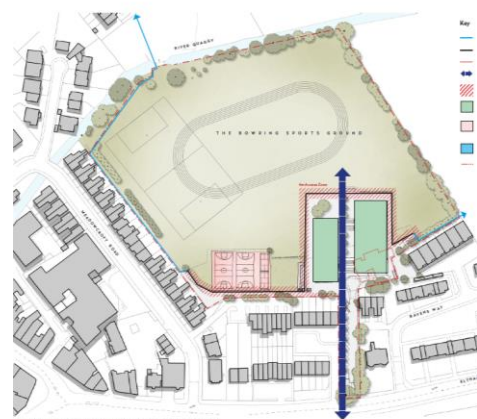
13 Like paragraph 89 of the 2012 NPPF, paragraph 145 of the revised NPPF states that the construction of new buildings in the Green Belt should be regarded as inappropriate development, with a few limited exceptions. It is acknowledged that the revised NPPF provides further clarity on the 'limited infilling' exception, explicitly stating affordable housing; however, this does not impact the present scheme. The policy position, therefore, remains as set out in the initial pre-application note.

Assessment of revised scheme

Figure 1 – As proposed (September 2018)



Figure 2 – Previous proposal (October 2017)



14 Since the initial pre-application meeting, the applicant has revised the positioning of the proposed building on the site, in line with comments raised by GLA officers both in the meeting, on-site and in the written feedback. Figures 1 and 2 provide the comparison of layout; figure 1 shows the present proposals, which hug the southern boundary of the site, whilst figure 2 shows the initial proposals which projects vertically into the site.

15 As noted at paragraph 17 in the initial feedback, GLA officers considered that any development on the site must be contained behind the existing flood defence wall, where it could broadly be considered previously developed land, and any development north of the existing flood defence wall would be inappropriate development, and therefore unacceptable, unless any very special circumstances are demonstrated to outweigh harm to the MOL.

16 The proposed school is now linear in layout, following the site's southern boundary; this is broadly in line with Option 1, as discussed in the pre-application response, which GLA considered would be the least harmful to MOL. In this regard, it is welcomed that the application has sought to amend the orientation in line with previous comments and the changes are considered to be a significant improvement on the initial design. It is noted, however, that the school still partially breaches the flood defence wall and is, therefore, considered inappropriate development; therefore, in any application, a full Very Special Circumstances case must be provided to enable an assessment of the scheme's harm to MOL. The applicant's VSC case was discussed in the initial pre-application response and as no further commentary has been provided, the applicant should have regard to the comments made in that report. In addition, verified rendered views of the scheme must be provided to assess the impact on openness.

17 Further, t

18 o enable a full assessment of the loss of open space, the applicant should provide the total square meterage breakdown of the following: undeveloped MOL land that is lost as a result of the development (including any hardstanding, car parking and MUGAs); previously development land used in the development; and any green space that is 'upgraded' or 'returned' to MOL as a result of the proposals.

19 It is now proposed to locate two MUGAs on the western side of the site, north of the flood defence wall. Whilst these are north of the flood defence wall, they provide facilities for outdoor sports and could, therefore, be considered an exception to inappropriate development if they preserve the openness of MOL, as set out at paragraph 145 of the revised NPPF. At the meeting, it was confirmed that these would be made of a permeable material but details of the boundary treatment, the colour and material of surface as well as rendered views of the MUGAS should be provided in any application to enable an assessment of the MUGA's impact on openness.

Education

20 London Plan Policy 3.18 and draft London Plan Policy S3 seeks to ensure that there is a sufficient supply of good quality educational facilities. Further, draft London Plan Policy S3 states that development proposals for education should, inter alia, be located in areas of identified need and in accessible locations. As noted within the initial pre-application response, the VSC should detail: why there is a need for a school in this location; whether there are any alternate sites, without an MOL designation, that could accommodate a school; and why local existing schools cannot be expanded to incorporate the demand. In addition, the application should demonstrate how the proposals accord with the criteria within draft London Plan Policy S3.

Principle of development conclusion

21 The proposed revisions to the orientation of the building are a welcome improvement on the previous design iteration. The scheme does, however, breach the existing flood defence wall, which GLA officers consider to be the limit for development on the site. In this regard, the proposals constitute inappropriate development, as set out at paragraph 145 of the revised NPPF, and are unacceptable unless Very Special Circumstances outweigh harm to the MOL by reason of inappropriateness. The applicant must provide a robust VSC in any application as well as provide the rendered views of the scheme to enable an assessment of openness and, ultimately, whether the VSCs outweigh any harm caused by reason of inappropriateness.

Urban design

22 Good design is central to all objectives of the London Plan and draft London Plan. The applicant has engaged positively in the pre-application process, which is welcomed. As noted above, the design revisions are welcomed and are considered to be a significant improvement upon the October 2017 design.

23 It is proposed to orient the school along the site's southern boundary, with an access route for the Environment Agency on the western part of the site, separating the school from the residential units to the south. On the southern side of the school, north of the access route, it is proposed to create an external teaching terrace which will be accessed from the playfields and provides a further buffer to the residential units as well as providing light into the basement classrooms.

24 The school building would comprise a basement and rise to two storeys above. The massing and form is well considered. In order to assess the impact of the building on the MOL's openness, rendered views of the scheme should be provided and full details of the materials should be provided within the Design and Access Statement.

25 The positioning of a glazed atrium in the centre of the school building, immediately in front of the access road that leads from Eltham Road, is supported as it will ensure views through the school, onto MOL, when pedestrians and vehicles arrive at the site.

Inclusive access

26 London Plan Policy 7.2 and draft London Policy D3 require that all new development is accessible and inclusive for all. Any application must provide full details of the accessibility and how any level changes are managed, including into the teaching terrace and over the flood defence wall as well as how the MUGA is accessed. The DAS should include an access statement, assessing the scheme against relevant Building Regulations and Sport England Guidance, where relevant.

Transport

27 Whilst a number of the points raised within the initial pre-application response have been taken on board, which is welcomed by TfL, the below comments should be read in tandem with the transport section within the initial pre-application response as they remain relevant.

28 The vehicular and pedestrian access into the site is from the unnamed road running north of Eltham Road, which is part of the Transport for London Road Network (TLRN). The access road appears narrow, so TfL support the applicant in staggering school hour arrival and departure. To reduce congestion, the applicant should consider opportunities to insert a secondary pedestrian

and cycle access, via a new footway/cycleway, from Weigall Road through Weigall Sport Ground to the east.

29 The anticipated trip generation, based on comparable sites, shows that the majority of the trips to and from the site would likely be by foot or by public transport, with limited driver trips in the morning and evening respectively. It is also welcomed the assessment projects that the existing public transport should not be adversely affected by the increased use to any significant degree.

30 TfL continues to recommend that the proposed crossing should be a 'toucan' crossing as it will give equal opportunity and safety to both pedestrians and cyclists. The applicant should continue to engage with TfL on this point.

31 The applicant should complete a Healthy Street assessment as part of the Transport Assessment.

Conclusion

32 Since the initial pre-application meeting, and in response to comments raised at that time, the applicant has explored alternative orientations and configurations of the school building to minimise the impact on MOL and its openness. It is considered, however, that at present the Very Special Circumstances presented do not outweigh harm to MOL by reason of inappropriateness. The applicant must, therefore, have regard to the issues raised within this report as well as in the initial pre-application report in any application.

for further information contact GLA Planning Unit, Development Management Team:


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██████████ **Principal Strategic Planner (case officer)**

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GREATER**LONDON**AUTHORITY


JLL,
30 Warwick Street,
London,
W1B 5NH

Our ref: GLA/4431/VH02
Date: 5 November 2018

Dear 

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

Site: Bowring Sports Ground (International Academy of Greenwich)

LB: Greenwich

Our reference: GLA/4431/VH02

Further to the follow up pre-planning application meeting held on 18 September 2018, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely


Head of Development Management

cc 

10 January 2018

International Academy of Greenwich
in the London Borough of Greenwich

The proposal

Demolition of existing structures and development of new five form entry state secondary school on Metropolitan Open Land, with associated Multi Use Games Area and car parking.

The applicant

The applicant is **Education and Skills Funding Agency** and the architect is **architecture initiative**.

Context

1 On 24 October 2017 a pre-planning application meeting to discuss the above proposal for the above site was held at City Hall, with the following attendees:

GLA Group:	<div>████████</div> <div>████████</div> <div>████████</div> <div>████████</div> <div>████████</div>	Senior Strategic Planner, case officer Senior Strategic Planner, design officer Principal Strategic Planner TfL Borough Planning TfL Borough Planning
LPA:	<div>████████</div>	RB Greenwich
Applicant:	<div>████████</div> <div>████████</div> <div>████████</div> <div>████████</div> <div>████████</div> <div>████████</div> <div>████████</div>	JLL JLL Robert West Architecture Initiative Architecture Initiative Education and Skills Funding Agency Education and Skills Funding Agency

2 The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor’s formal consideration of an application.

Site description

3 The site lies within the Bowring Group Sports Ground, north of Eltham Road. It is designated as Metropolitan Open Land (MOL). It is bound to the south by residential estates, to the east by Weigall Road Sports Ground and to the north by the park and the River Quaggy, a tributary of the River Ravensbourne. At present, the site houses a sports pavilion and some hard landscaping in the southernmost part.

4 The site lies on the western boundary of the Royal Borough of Greenwich, and the London Borough of Lewisham lies on the south side of Eltham Road. The school's catchment area is likely to span the two boroughs.

5 The site is located in between Blackheath and Lee Rail Stations. Both stations are approximately 1 kilometre away from the site and are served by South Eastern trains offering frequent services towards Dartford, Crayford and London Charing Cross. Blackheath provides additional services to London Victoria, whilst Lee Station provides services to London Cannon Street. There are four bus stops within 200 metres of the site, providing access to seven different services. Despite proximity to the bus services, the site has a PTAL rating of 2 (poor), on a scale of 0 to 6b, where 6b is excellent.

Details of the proposal

6 It is proposed to demolish the existing pavilion building, outhouse and flood defence wall and develop a school on the site, behind a new, relocated flood defence wall. It is also proposed to create a two or three court Multi Use Games Area (MUGA). Internally, the proposals include a sports hall, theatre, science labs, classrooms, drama studio and sixth form facilities.

Strategic planning issues and relevant policies and guidance

7 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises Greenwich Core Strategy (2014) and Site Allocations (Local Plan) (consultation draft, February 2016) and the 2016 London Plan (Consolidated with Alterations since 2011).

8 The following are relevant material considerations:

- National Planning Policy Framework;
- National Planning Policy Guidance; and
- Draft London Plan (consultation draft, December 2017)

9 The relevant strategic issues and corresponding policies are as follows:

- | | |
|---------------------------|---|
| • Metropolitan Open Land | <i>London Plan;</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG.</i> |
| • Inclusive design | <i>London Plan; Accessible London: achieving an inclusive environment SPG.</i> |
| • Sustainable development | <i>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.</i> |

- Transport

London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG.

Summary of meeting discussion

10 Following a presentation of the proposed scheme from the applicant team, the meeting discussions covered strategic issues with respect to the following: principle of development; MOL; urban design; inclusive access; transport; and sustainable development. GLA officer advice in respect of these issues is set out within the sections that follow.

Principle of development

Metropolitan Open Land

11 London Plan Policy 7.17 affords Metropolitan Open Land (MOL) the strongest possible protection, whilst Policy G3 of the draft London Plan states that MOL should be protected from inappropriate development and proposals that harm MOL should be refused. Both policies state that national Green Belt policies, set out within the NPPF, apply to MOL and therefore MOL is offered the same protection as Green Belt.

12 Chapter 9 of the NPPF is entitled 'protecting Green Belt land' and applies equally to MOL. Paragraph 79 states that the fundamental characteristic of the Green Belt is its openness and its permanence and a key purpose of the Green Belt is to prevent encroachment that would reduce green space, as per paragraph 80.

13 Paragraph 87 of the NPPF states that inappropriate development is, by definition, harmful to MOL and should not be approved except in 'very special circumstances'. When determining applications, LPAs should ensure that substantial weight is given to any harm to the Green Belt; 'very special circumstances' will not exist unless the potential harm to MOL by reason of inappropriateness, or any other harm, is clearly outweighed by other considerations.

14 The construction of new buildings should be regarded as inappropriate development, as set out in paragraph 89, with the following limited exceptions:

- Provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries;
- The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- The replacement of a building, provided the new building is the same use and not materially larger than the one it replaces;
- Limiting infilling in villages, and limited affordable housing for local community needs;
- Limited infilling or the partial or complete redevelopment of previously development sites (Brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

15 Paragraph 90 lists a limited number of development types which are not regarded as inappropriate development, provided they preserve the openness of the Green Belt, these are: mineral extraction; engineering operations; local transport infrastructure; reuse of buildings; and development brought forward under a Community Right to Build Order. The development of school buildings is not such a type of development.


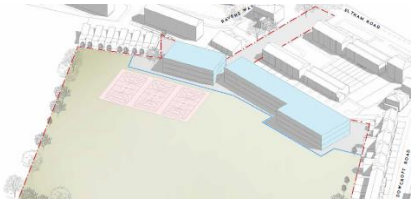

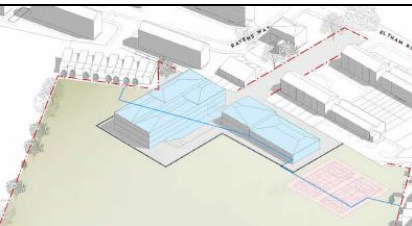
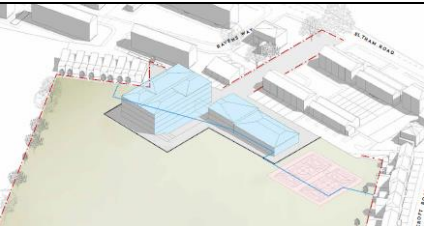
16 The existing flood defence wall runs around the perimeter of the sports ground before cutting across the site in the south, dividing the sports ground into two sides and effectively two typologies: the area north of the flood defence wall, which is entirely greenfield; and the smaller area south of the flood defence, which features the pavilion, the hard standing, pathway and some grassed areas between. Whilst it must be acknowledged that the entire site is within MOL, the area south of the flood defence wall can be considered previously developed land. It would, therefore, be considered 'limited infilling' and an exception to 'inappropriate development', in accordance with paragraph 89 of the NPPF, subject to a robust assessment with regards to impact on openness.

17 In accordance with London Plan Policy 7.17, draft London Plan Policy G3 and the NPPF, development of a school on undeveloped MOL is wholly unacceptable; any development proposed on this site must successfully be contained solely within the previously developed section, south of the existing flood defence wall. This must include all hardstanding and MUGA/artificial playing fields. Any development north of the existing wall, on undeveloped MOL, is inappropriate development, in accordance with paragraph 89 of the NPPF, and is unacceptable unless it is demonstrated that 'very special circumstances' outweigh harm to MOL. It must be noted, however, that GLA officers consider that any development beyond the wall would significantly harm MOL and it is unlikely to be offset by any 'very special circumstances'. Notwithstanding this, the harm to MOL and the applicant's justification for the 'very special circumstances' is considered further below.

Building orientation and harm to the MOL

18 At the pre-application meeting, the applicant presented a scheme that was formed of two buildings, linked by a walkway, projecting northwards into MOL. The arrangement, as proposed, is unacceptable as it would significantly encroach into green undeveloped land within MOL and would harm its openness. At the meeting, alternative orientations and layouts were discussed. Following the meeting, the applicant provided alternative options for comment; table 1 below outlines these options. Whilst the applicant's options exercise is welcomed, it is noted that the designs presented are concept and, as such, a full review of the detailed design, layout and impact of any proposed option would be required before any formal view could be provided.

Table 1: Development options

	Layout (nb. aerial view is looking south)	Description	Building footprint sq.m	Hardstanding sq.m
Existing		Pavilion building and outhouse – hardstanding not shown	578	4,076
Option 1		3 storey linear building behind existing flood wall	2,397	2,308
Option 2		Part 2/3 storey building, relocation of flood wall. Option presented at pre-application meeting	2,345	2,543
Option 3		Part 2/3 storey, as option 2 with communal building rotated horizontally	2,345	2,816
Option 4		Part 2/4 storey, increased height to reduce encroachment, orientation as as option 3.	2,080	2,816

19 Option 1 is a 3-storey linear building, which follows the boundary of the sports field, lies behind the existing flood wall and is primarily located on the previously developed land. It is noted that this option would result in the 3-storey school building being positioned very close to the two storey residential dwellings to the south of the site; however, there is a line of tall coniferous trees between the site and these residential dwellings, which limit views out of these properties onto MOL. Whilst this option would limit built development to the previously developed section of the site and therefore would be considered limited infilling, it does propose locating the MUGA on the north side of the flood defence wall, which is unacceptable. Furthermore, GLA officers have serious concerns as to whether, when fully designed, this option could contain all development within the southern section as discussed below.

20 Options 2 and 3 would be inappropriate due to their projection into MOL, breaking up its continuity, and their related impact on its openness. Further, as the built form in options 2 and 3 project beyond the existing flood wall, it would be necessary to relocate the flood wall further north; the perception of this would be to further reduce the size and openness of MOL. Of the options presented, these options are the most harmful to the MOL, are unacceptable, would not be supported and must be disregarded in any further design.

21 Option 4 features one linear block and one perpendicular block. The perpendicular block extends beyond the existing flood wall, but to a lesser degree than options 2 and 3 (enabled through an additional storey and resultant reduced floorplate). Whilst the encroachment and impact on the openness of MOL is reduced, when compared against options 2 and 3, this option is also unacceptable due to encroachment into MOL and subsequent impact on openness. This option must be disregarded.

22 In summary, of the options presented, options 2, 3 and 4 are unacceptable; the layout of the buildings result in significant encroachment into undeveloped MOL, and the perception of this encroachment is then intensified through the relocation of the flood defence wall further into MOL. In addition to the buildings, all options include the development of a hard-surfaced MUGA in MOL, which results in additional unacceptable encroachment.

23 As set out in paragraph 17, any development on the site (including any hardstanding) must not breach the existing flood defence wall; the existing wall must remain the northern boundary of the site's developed area. Whilst option one could be considered suitable for further interrogation, GLA officers have serious concerns regarding whether a school of the required size, with all of the internal and external facilities necessary, including all hardstanding, circulation, parking and MUGA / artificial sports pitches, can be accommodated on the area of the site south of the flood defence wall. For any development on previously developed MOL to be considered to meet the exception test, it must have no greater impact on openness; a full views assessment will therefore be required in order to assess whether the scale of development is acceptable.

Case for very special circumstances (VSC)

24 As discussed above, any inappropriate development in the MOL must ensure that any harm is outweighed by 'very special circumstances'. The applicant has presented a 'very special circumstances' in the submission documents, as follows:

1. The development will meet the accommodation needs of an existing school;
2. The development will contribute towards required school places for the Royal Borough of Greenwich and wider area;

3. There are a lack of suitable and deliverable alternative sites within the school's catchment area;
4. The development is largely confined to the area of previously developed land, together with ecological and landscape measures; and
5. The development would provide enhanced indoor and outdoor sports provision which, together with the new school facilities, would benefit the existing school and the wider community.

Analysis of case for VSC

25 The applicant quotes Greenwich's Council's School Capacity Survey (2016) to demonstrate that there is need for school places in the borough. According to this data there is a shortfall of 226 places in 2019/2020, 567 in 2020/2021 and 1,103 in 2021/2022.

26 Whilst there may be need for school places in the borough as a whole, the applicant has not demonstrated specific need for the school in this location, such as oversubscription at nearby state schools or whether capacity could be accommodated across the borough boundary in Lewisham. Evidence of engagement with both Greenwich Council and Lewisham Council is required to understand how need could be met across both boroughs.

27 Having regard to alternative sites, a full sequential analysis of all alternative sites which have been considered, with reasons for rejection, must be submitted with an application in order to support an argument that no feasible alternative sites exist, in Lewisham or Greenwich, to meet any evidenced educational need. The sequential test must also consider options to co-locate the school with other schools or expand existing schools.

28 With regard to enhanced sports facilities, these are welcomed provided that it is demonstrated that the proposals will not result in the loss of existing sports pitches. However, this does not constitute a case for VSC as it is not demonstrated that enhanced sports facilities cannot be delivered elsewhere or as part of a policy compliant development of the site.

Conclusion on MOL

29 To conclude on Metropolitan Open Land policy considerations, the development of school buildings or any associated facilities, such as MUGA or parking, on undeveloped MOL is inappropriate development by definition and is wholly unacceptable. Inappropriate development is only considered acceptable where 'very special circumstances' outweigh any harm to MOL; whilst the applicant has presented a VSC case, it is not considered that these reasons currently outweigh any harm.

30 However, development on the area south of the existing flood defence wall can be considered limited infilling, in accordance with paragraph 89 of the NPPF and subject to an assessment of openness, and is therefore an exception to this inappropriate development test. In order to meet this exception test, all development (including all hardstanding, parking and MUGA) must be contained behind the existing wall and the development must have no greater impact on openness than the existing site.

Educational facilities

31 London Plan Policy 3.18 and draft London Plan Policy S3 seeks to ensure that there is a sufficient supply of good quality educational facilities. Further, draft London Plan Policy S3 states that development proposals for education should, inter alia, be located in areas of identified need

and in accessible locations. As noted above for the applicant's VSC case, the applicant should seek to demonstrate that there is need for a school in this location, as well as seek to meet the other requirements of draft London Plan Policy S3 to ensure the strongest possible case is presented at application stage.

Urban design

32 Good design is central to all objectives of the London Plan and draft London Plan. It is noted that the detailed design of the proposals will be contingent on the layout and orientation of the proposals.

33 The design presented at the pre-application meeting (now referred to as Option 2) has a rational layout in terms of positioning the two blocks towards the southeast corner of the site and framing the entrance route from Eltham Road; however, as discussed above, the orientation of blocks would significantly encroach into the MOL and breach the line of the existing flood wall. In order to address this and minimise the extent of encroachment, the applicant was advised to explore alternative layout and massing options. On review of the options presented and following an informal site visit, GLA officers consider that any development must be contained within the area defined by the flood wall.

34 Notwithstanding the above, the sculpted roofline approach is welcomed in terms of minimising the perception of massing impact on the openness of the MOL, while also creating two distinctive but simple building forms. The intention to use a simple palette of high quality facing materials is strongly supported.

35 Officers would welcome further discussion on the points raised to arrive at the best possible design outcome before any application is submitted.

Inclusive access

36 London Plan Policy 7.2 and draft London Policy D3 require that all new development is accessible and inclusive for all. Any application must provide full details of the accessibility and how any level changes are managed. The DAS should include an access statement, assessing the scheme against relevant Building Regulations and Sport England Guidance, where relevant.

Flood risk

37 The site is partially located within Environment Agency Flood Zone 1 and within an area designated as a Flood Storage Area for the Quaggy River. In accordance with London Plan Policy 5.12 and draft London Plan Policy SI12, a detailed Flood Risk Assessment (FRA) should be submitted with any planning application; this must include pre-agreements from the Environment Agency if it is proposed to move the flood defence wall. In addition, a full SuDS and drainage strategy will be required. The detailed flood risk comments will be provided to the applicant.

Transport

38 The site is accessed from Eltham Road, which is part of the Transport for London Road Network. School pick up and drop offs may have adverse impact on the road network; as such, measures to mitigate any impacts will be required, in accordance with draft London Plan Policy T4.

39 Whilst the London Plan and draft London Plan does not provide any specific guidance on parking for schools, the draft London Plan seeks to reduce overall car reliance. The school proposes 22 car parking spaces; this has been derived from a scaling up of the existing school's

modal shift. Given this context, the applicant should first seek to reduce the number of spaces, in line with draft London Plan Policy T2 which promotes healthy streets. If it can be robustly demonstrated that this is not possible, the applicant must rigorously justify the number of car parking spaces proposed. The two proposed Blue Badge parking spaces should be retained.

40 London Plan Policies 6.9 and 6.10 promote cycling and walking, whilst draft London Plan Policy T2 introduces a 'Healthy Streets' approach, with a key principle to reduce the dominance of vehicles on London's streets. In this context, the proposed road crossing should be a toucan crossing to ensure priority to pedestrians and cyclists. Further, in line with draft Policy T2, the applicant should consider formalising any existing desire lines to ensure that the site is permeable and accessible for pedestrians.

41 The proposed development should meet draft London Plan standards on cycle parking, in accordance with draft London Plan Policy T5, including providing some spaces for non-standard bikes and scooters. Changing and storage facilities must also be provided for staff.

42 Any application should be accompanied by a comprehensive Transport Assessment, Travel Plan, Delivery and Servicing Plan and Construction Logistics Plan.

Conclusion

43 The development of school buildings and any associated facilities, such as hardstanding, MUGA and parking, on undeveloped MOL is inappropriate development and is wholly unacceptable. The land south of the existing flood defence wall is considered to be previously developed land where limited infilling is an exception to inappropriate development, in accordance with the NPPF. In order to meet this exception test, all development (including any hardstanding or MUGA) must be limited to the area south of the existing wall and a full assessment on the impact on openness undertaken.

44 Any development which breaches the existing flood defence wall is inappropriate and unacceptable and would only be considered acceptable where 'very special circumstances' outweigh any harm to MOL, in accordance with the NPPF. At present, the case for VSC has not been adequately set out. The points raised in this report with respect to educational facilities, design, inclusive access, transport and flood risk must also be addressed prior to the submission of any application.

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