

GREATER LONDON AUTHORITY

[REDACTED]
(By email)

Our Ref: MGLA151220-2017

8 February 2021

Dear [REDACTED]

Thank you for your request for information which the GLA received on 15 December 2020. Your request has been dealt with under the Environmental Information Regulations (EIR) 2004.

You asked for:

I would like to request information in relation to the planned Durston House school development in Ealing (Ealing Planning application ref 191182FUL):

In particular any correspondence or meetings between the dates 1st January and 31st July 2020 conducted between:

- *Rupa Huq MP and Sadiq Khan or his planning team responsible for refusing the above planning application.*
- *Onkar Sahota (London Assembly) and Sadiq Khan or his planning team responsible for refusing the above planning application.*

To include copies of any such correspondence including any attachments to emails and papers submitted in meetings in the same timeframe.

Our response to your request is as follows:

Please note that some names of members of staff and members of the public are exempt from disclosure under Regulation 13 (Personal information) of the EIR. Information that identifies specific employees 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.

Please note that information out of scope of your request has also been redacted.

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

Yours sincerely



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>

[REDACTED]

From: [REDACTED]
Sent: 08 January 2020 13:55
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Yep, I'm sat just by office 7.4W, but then if we use Onkar's office to meet – it's 7.2W.

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 January 2020 13:54
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

I will see if John is free now and if so head up. Could you remind me of the location?

Best

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk
[REDACTED]@london.gov.uk

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 January 2020 13:52
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Onkar isn't in but if you are able to come up and have a chat with me about it that'd be helpful! Either now, or after 3:30? (I'm in a meeting 2:30 – 3:30)

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 January 2020 13:51
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Hi [REDACTED]

Is there a time which would be suitable today? John and I would be happy to come up if you have availability?

Best

[REDACTED]

[REDACTED] [REDACTED]

Senior Strategic Planner, Development Management

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

020 7983 [REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 08 January 2020 13:47

To: [REDACTED] <[REDACTED]@london.gov.uk>; John Finlayson <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Sorry to be a pain, but we are in Ealing tomorrow – would it be possible to a phone call instead? Would 2:30 work?

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 08 January 2020 13:44

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>; John Finlayson <[REDACTED]@london.gov.uk>

Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Hi [REDACTED]

John Finlayson (Head of Development Management) and [REDACTED] (Strategic Planner) would be happy to meet Onkar tomorrow. Please can you liaise with them directly re their diaries.

They will update Jules after the meeting.

Cheers

[REDACTED] [REDACTED]

Senior PA to Jules Pipe CBE, Deputy Mayor Planning, Regeneration & Skills, Mayor's Office

MAYOR OF LONDON

City Hall, The Queen's Walk, London SE1 2AA

020 7983 [REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 January 2020 11:29
To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Hi,

This issue is going to Ealing Council imminently (and we are fairly sure the planning committee will pass it through stage 1). Is there a time either today or tomorrow that would be good for a quick catch up with Jules or, more likely, one of the planning team to discuss what happens next from a GLA perspective (and if so who would be best to talk to?)

Thank you!

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 25 April 2019 10:09
To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School



[REDACTED] [REDACTED]

Senior PA to Jules Pipe CBE, Deputy Mayor Planning, Regeneration & Skills, Mayor's Office
MAYOR OF LONDON

City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk
[REDACTED]@london.gov.uk

From: [REDACTED] [REDACTED]
Sent: 25 April 2019 10:08
To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Of course – will do!

And thank you.

From: [REDACTED] [REDACTED]
Sent: 25 April 2019 09:57
To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Hi [REDACTED]

Going forward can you come to me first re the diary please?

I will speak with Jules and revert.

Thanks

██████████ ██████████
Senior PA to Jules Pipe CBE, Deputy Mayor Planning, Regeneration & Skills, Mayor's Office
MAYOR OF LONDON

City Hall, The Queen's Walk, London SE1 2AA
020 7983 ██████████

london.gov.uk

██████████ [london.gov.uk](https://www.london.gov.uk)

From: ██████████ ██████████
Sent: 24 April 2019 18:35
To: Jules Pipe <██████████ [london.gov.uk](mailto:██████████@london.gov.uk)>
Subject: Request from Onkar Sahota for a meeting re: Durston House School

Hi,

Would I be able to organise a meeting between you and Onkar to discuss this planning application, which will be coming through the GLA?

Thank you,

██████████ ██████████ ██████████
Research and Support Officer to Onkar Sahota AM

London Assembly **Labour**

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

Tel: 020 7983 ██████████

london.gov.uk

██████████ [london.gov.uk](https://www.london.gov.uk)

my pronouns are: ██████████

[REDACTED]

From: [REDACTED]
Sent: 16 January 2020 14:58
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: Jules Pipe <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Subject: Letter from Onkar Sahota AM re: Durston House School

Hi,

Please find attached a letter from Onkar regarding this planning application, and the documents that he references in the letter.

All the best,

[REDACTED]
Research and Support Officer to Onkar Sahota AM
London Assembly Labour
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
Tel: 020 7983 [REDACTED]

london.gov.uk
[REDACTED] [london.gov.uk](https://www.london.gov.uk)
my pronouns are: [REDACTED]



LONDONASSEMBLY**LABOUR**

Dr Onkar Sahota AM MBA FRCGP

Working hard for Ealing & Hillingdon

City Hall, The Queen's Walk, London SE1 2AA

020 7983 [REDACTED]

RE: 191182FUL – Rebuilding Durston House Prep School on the Sports Ground

Dear Sadiq,

I am writing to you regarding the planning application for Durston House Preparatory School, which was recently passed at Ealing Council's Planning Committee despite the application not complying with the London Plan, worsening Air Quality around the school and also objected against by the Sports Council of England.

I have received a huge volume of representations from local people about this application, and I agree with them that going ahead with this would be a mistake for the local area.

The decision is very contentious and was only passed on the casting vote of the Chair of the Planning Committee. The motion was passed on the chair's casting vote, after five councilors voted against and five voted in favour, with two abstentions. I believe the Chair may well have voted out of loyalty to the officer recommendation.

Increased traffic, congestion and pollution

The consolidation of Durston House School from their three existing sites into one and the expansion in total school capacity from 432 to 540 (an increase of 20%). 64% of pupils and 27% of staff currently arrive and depart the school by car.

I believe that this will lead to a substantial increase of traffic onto Carlton Road and nearby narrow residential streets. I can speak from personal experience when I say the traffic in the area is already congested – and this will only make the situation worse.

Additionally, the loss of outdoor play space will mean all pupils will need to be bussed daily outside of the Borough for sports activities and PE lessons. Ancillary use of the school complex outside of normal school hours will create additional traffic outside of peak hours.

These proposals will cause a significant increase in traffic congestion, gridlock, CO2 and air pollution, increase the risk to pedestrian safety. I am worried that the environmental impact would run contrary to the goals of the new London Plan to improve London's air quality.

Additionally, the new playing fields are to be AstroTurf – around which there has been a good deal of concern, both around the health and environmental impacts¹.

¹ <https://www.theguardian.com/cities/2019/aug/02/turf-it-out-is-it-time-to-say-goodbye-to-artificial-grass>

No affordable housing

Because of the way that the housing supply has been divided up, this scheme has avoided having to fulfill any need to contain affordable housing; by making it officially three separate developments, rather than one.

When we so desperately need more affordable housing in London, I am disappointed that this scheme has found a way around having to supply any. This is using up land that could otherwise be used for affordable housing schemes.

Opposition among local residents

I attach some of the documents that lay out the grounds of the objections of the local residents and reflect the many conversations I have had with the local residents since the possibility of such an application coming forward was raised.

The Planning Committee was misguided in approving the application. However, you have an opportunity under your Part 2 determination to re-assess the merits of their decision.

I hope you will reject the application the grounds:

1. That it does not comply with the Draft London Plan
2. It will lead to deterioration of air quality in the streets around the school and is not consistent with the policy initiative of 400m safe zoning around schools.
3. Loss of playing facilities and the alternatives do not satisfy the Sports Council who have also objected to this application.
4. There are no exceptional grounds on why building on open community space should be allowed
5. There are no gains by the local community who are being asked to pay a huge cost of damaging their health for increasing primary school places which the Borough does not need.

I urge you to reject this application in your Part 2 determination.

Yours sincerely,



Dr Onkar Singh Sahota AM
London Assembly Member for Ealing & Hillingdon

Cc: Jules Pipe, Deputy Mayor for Planning

Our Reference: 502.0056/050619/JR

5th June 2019



London Borough of Ealing

Planning Service

4th Floor, Perceval House,

Ealing

W5 2HL

Suite 4, Hitching Court, Blacklands Way,
Abingdon Business Park, Abingdon
OX14 1RG

T [REDACTED]

E info@paulbashamassociates.com

W www.paulbashamassociates.com

Dear [REDACTED]

**Durston House School 12 – 14 Castlebar Road Ealing London W5 2DR (Reference 191182FUL)
Further Representation Letter**

Following on from my letter dated 26th April 2019 (Ref: 502.0056/260419/JR), I am writing on behalf of local residents to raise further concerns as well as to document the findings from recent traffic surveys undertaken on Carlton Road.

Coach Trips

As outlined within our previous Representation Letter, the TA submitted to support the application states that Durston House School receives on average once coach trip per day. Although the development proposals include a singular coach parking bay on Carlton Road, no consideration has been given to the extra demand for coaches that the increase in pupils will likely create. Since writing my previous letter, the residents have now undertaken their own surveys and believe there to be approximately 10 coach/minibus trips from Durston House School (across the three sites) on an average school day, a much greater number than the estimate within the TA.

Safety implications of pupils sharing the same access as vehicles

On behalf of the residents I would also like to bring to your attention the safety implications associated with young pupils accessing the site via the same point as all delivery and servicing vehicles which are required to perform a three-point turn to manoeuvre on site. Although the TA states that *'No waste collection or deliveries will be undertaken during school hours, during which time the courtyard is a pedestrian only area enforced with gates'*, it is likely that deliveries from couriers etc. will inevitably take place during the school day. If the courtyard is to remain a pedestrian only area throughout the school day, servicing vehicles will either have to pay to park on Carlton Road or wait on the carriageway whilst delivering the goods, contributing to increased congestion/conflicts along the carriageway. The early years element of the development is accessible via a second means of access located towards the western site border. The pupils entering/exiting the site via the vehicular access are therefore more likely to be unaccompanied by parents, raising increased concern. Furthermore, the proximity of the proposed 'early years' access to an existing residents garage/property raises further safety concerns. Vehicles frequently use this access and the act of vehicles entering and exiting the property alongside significant volumes of pedestrian traffic warrants further consideration.

Frequency of cycle collisions

As part of the planning application, Mayer Brown prepared a Cycle Level of Service (CLOs) Assessment, assessing the local cycle routes to the application site. The CLOs assessment states that *'Large sections of Ealing and the surrounding area have been marked out within TfL's 'London Cycling Guide 6' as being quieter roads that are recommended by other cyclists for cycling...However only small lengths of the highway network subject to this CLOs Assessment are marked out as being specifically suitable for cyclists'*. Within the assessment it was identified that out of the 15 recorded collisions within the CLOs Assessment Area (over a five-year period), five occurred at the Gordon Road/Carlton Road/St Leonard's mini-roundabout junction situated to the south-west of the development

Cont.



Transport Planning



Highway Design & Civil Engineering



Travel Planning

QMS0096/v4/200818/SA

site, with a further accident at the Carlton Road/Castlebar Road junction. The CLoS Assessment goes on to state that *'the mini roundabout junction is the only junction of this type within the study area and...that cyclists are vulnerable at all types of road junction, however mini-roundabouts can pose particular problems'*. It is evident that there are already highways safety issues at this mini-roundabout and the implications of adding increased pedestrian/cyclist traffic (particularly young children) to this accident hotspot warrants further consideration.

Traffic along Castlebar Road

In the current situation, vehicles travelling along Castlebar Road (B455) to the Pre-Prep and Main school sites are not required to turn right across oncoming flows of vehicle traffic. This helps to maintain a steady flow of traffic along a well-used route. The consolidation of the three sites onto Carlton Road would mean that all cars which currently travel southbound along Castlebar Road would be required to turn right onto Carlton Road. It is noted that whilst a right-turn lane is provided at the Carlton Road/Castlebar Road junction, its narrow width means that vehicles waiting to turn right still occupy part of the main southbound lane of traffic and, therefore, disrupt the flow of traffic along Castlebar Road. During the AM and PM peaks the high volumes of traffic carrying out this manoeuvre is likely to cause significant disruptions to the operation of the local road network, to which any consideration is absent in the submitted Transport Assessment.

Visibility from existing driveways

With the exception of a small number of spaces dotted along the carriageway, on-street parking is currently only permitted on the northern side of Carlton Road along the frontage of the site. Relocating the school to the premises on Carlton Road would undoubtedly lead to vehicles stopping on the southern edge of the carriageway during pick-up and drop-off periods. Visibility from the existing properties along Carlton Road is already limited due to the large trees situated along the pedestrian footway. Vehicles parking along the carriageway would further reduce the extent of visibility achievable from the existing properties meaning that vehicles would be required to drive halfway into the carriageway before they can see both vehicles and pedestrians travelling along the carriageway. This raises a safety issue for both the existing residents, including the visually impaired residents who are known to live on Carlton Road and the new site users especially given the age profile of the students at the school.

Parent/teacher meetings in the evening and amenity use by the public

In my previous letter I highlighted the TA's lack of consideration as to where parents can park whilst dropping off/picking up their children from school. In relation to this concern it has also been brought to my attention that parent and teacher meetings happen throughout the term in the evenings from 6pm onwards and that parts of the site will also be open to the public for amenity use. The parking survey undertaken as part of the TA identifies that following the implementation of the coach bay on Carlton Road, a minimum spare capacity of 5 'Permit Holders or Pay by Phone' spaces would be provided along Carlton Road. This level of spare capacity is insufficient to absorb the demand that will arise from the school, particularly in the evenings when residents demand for spaces is the highest. No consideration has been given to how this additional demand would be accommodated.

Disabled parking

The TA states that *'One disabled **visitor** parking space is situated within the main entrance courtyard if required by a disabled visitor'*. Although I appreciate that this is in accordance with the current London Plan which states that *'Non-residential elements of a development should provide at least one accessible on or off street parking bay designated for Blue Badge holders, even if no general parking is provided'*, no consideration has been given to any demand that may arise from the 540 pupils and 100+ staff members. Although disabled pupils are only likely to require a parking space on-site during the drop-off and pick-up periods, there is only one space provided. The implications if this were to be occupied by a disabled staff member or visitor have not been considered. Furthermore, it is proposed that the courtyard will be gated during the school hours, however, in order for disabled

Cont.



staff and pupils to be able to access the disabled space, vehicles must travel through the gate alongside the pedestrians entering the school site.

Public Transport

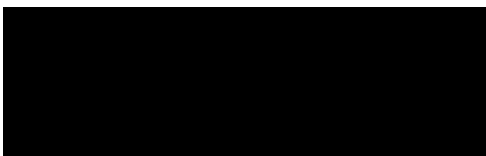
The existing school sites are located closer to existing bus stops than the proposed school site on Carlton Road. The Eaton Road bus stop is situated along Castlebar Road in between the Pre-Prep and the Main school, placing both sites within less than a minute's walking distance of a bus stop. The main school is also situated within less than a one-minute walking distance from the Castlebar Road SE stop situated on Eaton Rise. Zebra crossings across both Eaton Rise and Castlebar Road provide a safe and convenient route for pupils travelling to/from the school site to the bus stops. The relocation of the site would require young children to walk further distances to/from school and cross busy roads without pedestrian crossings in place to facilitate safe travel.

Traffic Surveys

Independent Traffic Surveys were undertaken by 360 TSL on Wednesday 22nd May 2019 to investigate the current levels of traffic along Carlton Road, the full outputs are attached. The results indicate that on the day of the survey 406 vehicles travelled along Carlton Road during the main drop-off period (0800-0900) and 332 vehicles travelled along Carlton Road in the pick-up period (1500-1600). Using the data from the submitted TA (which we have already critiqued in terms of its failure to consider that new pupils may travel from further afield as well as the assumption that the number of staff will remain the same) the proposed school site is expected to generate 371 cars along Carlton Road during both periods. Figure 5.1 in the submitted TA illustrates the distribution of the existing pupils place of residence. The figure illustrates that the existing pupil population is fairly disbursed in all directions (north, south, east and west) from the proposed site. Assuming that 25% (69) of the 276 pupils and 25% of staff (6) who currently travel to school by car, already travel along Carlton Road the relocation of the site is expected to generate an additional 296 trips travelling along Carlton Road during the drop-off and pick-up periods. This brings the total no. of vehicles along Carlton Road to 702 in the drop-off period (+73%) and 628 (+89%) in the pick-up period. Such significant increases in traffic along an already congested road will inevitably cause disproportionately large disruptions and delays, further to existing reported issues.

It is noted that the Greater London Authority Planning Report (GLA/4597/01) has raised several of the transport issues as well as issues with cycle parking and quantum which I raised within my previous letter. The response also states that '*It has been demonstrated that there is unlikely to be an adverse impact on the capacity of public transport modes or on the strategic road network. It is nevertheless noted that there may be significant impacts on the local highway network*'. To summarise there are a number of considerable issues associated with the application with regards to transport that merit further consideration.

Yours sincerely

A large black rectangular box redacting the signature of the Principal Transport Planner.

Principal Transport Planner
Paul Basham Associates

T: 

E:  paulbashamassociates.com



Our Reference: 502.0056/170919/JR

17th September 2019



London Borough of Ealing

Planning Service

4th Floor, Perceval House

Ealing

W5 2HL

Suite 4, Hitching Court, Blacklands Way,
Abingdon Business Park, Abingdon
OX14 1RG

T [REDACTED]
E info@paulbashamassociates.com

W www.paulbashamassociates.com

Dear Mr [REDACTED]

Durston House School 12-14 Castlebar Road Ealing London W5 2DR (Reference 191182FUL)

Following on from my previous letter dated 7th June 2019 to which Mayer Brown responded on 18th June 2019 (Ref: APJ/SYDurstonHouse.1) I have the following comments to offer. The consideration given by Mayer Brown to our previous concerns is welcomed, however, the following issues are outstanding.

Traffic along Castlebar Road

In relation to the flow of traffic along Castlebar Road, Mayer Brown state:

"It also follows that those vehicles accessing the existing sites turning right out of Carlton Road onto Castlebar Road will no longer have to do so."

It is anticipated that a proportion of vehicles will still likely turn either left or right out of Carlton Road onto Castlebar Road to continue their onward journey having visited the new school site. All remaining vehicles approaching the new site from the west will be required to carry out a 3-point manoeuvre on Carlton Road which would exacerbate existing congestion along Carlton Road particularly in the peak periods. This will be further impacted by the two additional proposed road narrowings along Carlton Road. Vehicles are still therefore likely to turn onto Castlebar Road.

Further consideration is also needed regarding the ability of coaches and servicing vehicles to manoeuvre within the vicinity of the site. The applicant has failed to demonstrate that larger vehicles can safely manoeuvre around the large tree positioned at the centre of Carlton Road near to the Carlton Road/Castlebar Road junction.

Visibility from Existing Driveways

In relation to visibility from existing driveways, Mayer Brown state:

"Carlton Road (south side) is subject to a mix of single yellow lines (Mon-Fri 9-5), double yellow markings and accesses to dwellings. It would not be an unreasonable starting point to assume that parents who drive to the site would be law abiding. As such, I would expect them to adhere to local traffic regulations and park in appropriate locations."

Whilst under general circumstances this would not be an unreasonable starting point, it is evident that unlawful parking by school parents is already occurring along Carlton Road and Pinewood Grove and therefore this assumption is not borne out by current practice. If this is the situation whilst all three schools are dispersed across the local road network, it can only be expected that unlawful parking will continue to happen (and worsen) when the three sites are consolidated onto Carlton Road. Photographic evidence of unlawful parking on the local road network is provided below.

Cont.



Transport Planning



Highway Design & Civil Engineering



Travel Planning

QMS0096/v4/200818/SA

An additional point to raise with regards to parking demand on the local road network is that no consideration has been given to the additional parking demand that would result from the increase in staff numbers. The original Transport Assessment submitted to support the application states that *“there are no proposed additional staff under the maximum capacity scenario”*. Given that the school currently employs 89 staff members for 432 pupils it seems unlikely that the uplift of 108 pupils would not generate any additional demand for staff members especially considering that the proposed site has catering facilities which the current sites do not have.



Photograph 1: Evidence of Unlawful Parking on
Pinewood Grove



Photograph 2: Notices issued by Durston School to
excuse unlawful parking.

Parent Teacher Meetings in the evening and Amenity Use by Public

In relation to parent teacher meetings and amenity use by public, Mayer Brown state:

“All of the sites are circa 250m from each other and any parking which does occur in the area associated with evening meetings will already be occurring on the local roads.”

Whilst all of the sites are currently situated within fairly close proximity to each other, the sites are dispersed across the local road network and therefore it follows that parking is also dispersed in the current scenario. The consolidation of the three sites would mean that all parent meetings will take place on Carlton Road and therefore parking demand on Carlton Road and Pinewood Grove will increase with parents wanting to park as close to the site as possible. Furthermore, Mayer Brown’s statement is not entirely correct as the parking demand will increase due to the uplift in pupil numbers with Mayer Brown reconfirming in their letter dated 11th June 2019 that only 10% of pupils walk to the site and 10% cycle.

Mayer Brown go on to state:

“Turning to the community use...The facilities will only be available for clubs and societies who have pre-booked.

Furthermore, given these facilities are intended for the local community, it is not unreasonable to assume a significant proportion of those visiting will come by sustainable modes of travel.”

Cont.



Whilst I agree that it would be reasonable to assume a proportion of those visiting the site will live locally and travel to the site via sustainable modes of travel, the site will still generate demand for parking that is additional to current demand, particularly during the winter months when existing issues are also at their worst. There is also no guarantee that the site will only be used by local communities or that visitors will travel to the site sustainably.

Public Transport

In relation to public Transport, Mayer Brown state:

“Those pupils alighting the Eaton Rise stop (eastbound) and wishing to access the new school site will benefit from the zebra crossings on Eaton Rise and Castlebar Road, leaving only Carlton Road to cross to access the new site. This can readily be done at the narrowing adjacent to the school and Pinewood Grove.”

From my understanding of the local road network, pupils alighting the Eaton Rise stop would also be required to cross at the Longfield Road junction where crossing facilities are limited to a dropped kerb arrangement with tactile paving. It is not unreasonable to assume children travelling to the Junior and Upper schools may be travelling unsupervised by parents and therefore greater consideration should be given to how the safety of pupils will be maintained.

Whilst the narrowing of the road acts to improve pedestrian safety, this is not a formalised crossing point where vehicles are required to give-way to pedestrians. Careful consideration needs to be given to achieve an equilibrium between ensuring the safety of pupils whilst minimising disruptions to the flow of traffic on an already congested road. In addition to on-street coach parking during the pick-off and drop-off periods the proposals to implement two further road narrowings along the site frontage will undeniably disrupt the flow of traffic along an already congested route. It is important that pupils are not prioritised at the detriment of local residents and that that efforts to improve pupil safety do not result in unsustainable levels of congestion.

It is understood that the existing narrowing was implemented following parents’ concerns that Carlton Road was a busy road and not seen as safe for children to cross. Pupils being dropped off/picked up at the western end of Carlton Road are unlikely to make use of the existing road narrowing and it is therefore agreed that additional measures are implemented to ensure the safety of children, however, it is important that provisions are balanced with the access needs of existing local residents and are not at the detriment of the local road network.

Traffic Surveys

In relation to traffic along Carlton Road, Mayer Brown state:

“I am both disappointed that PBA were not able to submit the raw survey information with their letter for our consideration and also surprised that they are able to reach such conclusions.”

Following through their calculations on how volumes of traffic may, or may not, affect a road, PBA will be aware a single lane of carriageway (i.e. one direction) has a link capacity of between 1800 and 2100 vehicles per hour (in each direction). The figures they cite are likely to use Carlton Road therefore represent about one third of the link capacity of the road.”

For reference, the raw survey outputs were uploaded to the planning portal on 12th June 2019 attached to our letter dated 10th June (Ref: 502.0056/100619/JR).

Cont.



Mayer Brown's assumption has failed to take into account limiting factors such as road narrowings, on-street parking etc. It would be unwise to ignore existing operational issues and not take these into account when calculating the actual capacity of the road network.

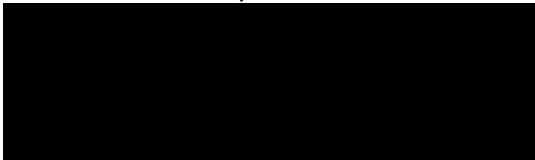
Mayer Brown go on to state:

"This is obviously a high-level calculation and the Council will draw considerable comfort that this level of pick up/drop off activity already occurs at the exiting school sites just 250m east of Carlton Road with no significant detriment to the operation of the local road network."

It is evident that pick up/drop off activity is already occurring unlawfully on the local road network whilst the three sites are dispersed across the local road network. No consideration has been given to the impact of consolidating the three sites onto one or the impact of an additional 71 students arriving to school by car. The assertion that the future operation will be akin to the existing situation is erroneous, and this stance does not take into account existing unlawful parking.

Overall, the application has failed to demonstrate that a workable solution to the development can be achieved and that the development would not disrupt the operation of the road network or pose future safety concerns.

Yours sincerely

A large black rectangular box redacting the signature of the Principal Transport Planner.

 
Principal Transport Planner
Paul Basham Associates

T: 
E:  paulbashamassociates.com



Our Reference: 502.0056/260419/JR

26th April 2019



██████████
London Borough of Ealing
Planning Service
4th Floor, Perceval House,
Ealing
W5 2HL

Suite 4, Hitching Court, Blacklands Way,
Abingdon Business Park, Abingdon
OX14 1RG

T ██████████
E info@paulbashamassociates.com
W www.paulbashamassociates.com

Dear Mr ██████████

Durston House School 12 – 14 Castlebar Road Ealing London W5 2DR (Reference 191182FUL)
Representation Letter

I am writing on behalf of a group of local residents to comment upon the above planning application (Ref: 191182FUL) from a highway and transport perspective. In our professional opinion, the proposed development is likely to have a significant impact on local highway and pedestrian safety which has not been satisfactorily addressed by the submitted Transport Assessment (TA). Having reviewed the TA prepared to support the application, the following issues have been identified:

Trip Generation

Carlton Road is known to be used as a 'rat run' for traffic avoiding Ealing town centre, which is only anticipated to increase as a result of the various current and planned developments in the town centre. In the immediate area, planning consent has been granted for the redevelopment of the BT site on Gordon Road, an application for the hotel in the Town Hall is pending, Perceval House is in the pipeline, in addition to several other smaller developments. Furthermore, the advent of Crossrail to Ealing Broadway tube will result in changes to the network that will impact on Carlton and Castlebar Roads. Due to the narrow width of Carlton Road, the rat-running causes congestion issues along its length and at the main junctions within the vicinity of the site e.g. the Gordon Road/St Leonard's mini roundabout. Any increase in the volume of both pedestrian and vehicular traffic along Carlton Road and through the nearby junctions would therefore have a disproportionately large impact and is of significant concern especially given the intended users of the site (i.e. infants and children).

The TA submitted as part of the planning application states that *"Since the primary aim of the proposals is to reconsolidate the three school buildings onto a single site, it is considered unlikely to give rise to any material harm on the adjacent highway network in terms of additional trips"*. Although it is true that many of the trips associated with the development are existing on the local road network, insufficient consideration has been given to the implications of consolidating the three sites onto one and the impact of concentrating this traffic on Carlton Road, particularly during drop-off and pick-up times.

The existing school buildings currently have a combined maximum capacity of 432 pupils. Traffic surveys undertaken by the school in February 2018 indicate that 64% of pupils (276 pupils) and 27% of staff (24 staff members) currently travel to the site by car. With 276 vehicles arriving and then leaving to drop off children in the morning and 24 staff arriving at work, this equates to 576 vehicle trips before the start of the school day. The same is true once school has ended. No consideration has been given to the delays and disruption that the consolidation of these trips in one location over a very short period of time would cause, nor the safety issues associated with this volume of traffic. Currently, the impact of the traffic generated by the school is comparatively low given that this is dispersed across three sites. Consolidation onto a single site will inevitably cause greater levels of congestion

Cont.



Transport Planning



Highway Design & Civil Engineering



Travel Planning

QMS0096/v4/200818/SA

and parking issues.

To make matters worse, *“the new school building at Castlebar Field would have a theoretical maximum capacity of 540 pupils”*, an increase of 108 pupils. The submitted TA makes no assessment of the impact this would have, and

it also assumes that no additional staff would be employed, which appears illogical. Based on the existing modal share, it is anticipated that of the 108 additional pupils, 71 would travel to school by car, bringing the total number of trips expected before/after school to be 718 (a 25% increase). This increase alone warrants further investigation, but when combined with the consolidation of existing trips onto Carlton Road, the absence of any analysis of the impact this would have on the local road network renders the Transport Assessment not fit for purpose. The additional traffic and disruption caused by the development will also be in direct conflict with LB Ealing’s forthcoming Liveable Neighbourhoods scheme which aims to reduce traffic and encourage walking, cycling, and the use of public transport.

Also important to note is that these calculations assume that the additional 108 pupils would exhibit the same travel patterns as those of the existing pupils. The TA states that *“Durstun House School operates an inclusive admission policy, the school has no set catchment area for its pupils, most of whom live in Ealing, but some do travel quite far”*. It is therefore possible that a larger proportion of the new students may travel to school by car. Indeed, given that Durston House is already the leading boys prep school in Ealing, it seems likely that the additional capacity may well be filled by those travelling longer distances and thus less likely to walk or cycle to school.

In addition to the trips associated with pupils and staff arriving at and departing school, the TA states that Durston House School also receives on average one coach trip per day to transport pupils safely to sporting events and school trips. Although the development proposals include for the removal of nine on-street parking spaces to provide a coach parking bay on Carlton Road, with increased pupil numbers, it can reasonably be assumed that there will be an increase in coaches and trips from the site, which has not been considered within the TA. Furthermore, at present, pupils can walk from the existing schools sites to the Castlebar Playing Field. However, the present application would mean that all pupils would need to travel by bus to the schools’ other playing field facilities, further increasing the anticipated number of coach trips.

The TA has failed to give any consideration to the number of delivery and service vehicles which will be travelling to the site many times per week. Finally, despite the planning application description including the conversion of the former sites to residential, no assessment of the likely trip generation for these uses has been made.

Overall, the impact on Carlton Road has not been analysed in sufficient detail and it is therefore considered that the application as it stands does not meet the criteria set out in the National Planning Policy Framework (NPPF) paragraph 108 to ensure that, *“... safe and suitable access to the site can be achieved for all users; and ... any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”* Paragraph 109 states that *“Development should only be prevented or refused on highways grounds if there would be unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”*. In our professional opinion the application has failed to prove that the development will not have an unacceptable impact on highways safety, or that the residual impact will not be severe.

Furthermore, the application fails to meet the requirements of various London Plan policies and those within Ealing’s Development Management DPD. Policies 6.1, 6.3, 6.9, 6.10, 6.11, 6.12, 6.13 and 6.14 of the London Plan, Policy 6.13 of Ealing’s Development Management DPD and Ealing’s Sustainable Transport for New Development SPD require developments to be assessed on the effects it would have on the transport capacity, traffic flow and congestion. These policies also require developments to provide secure, integrated, convenient and accessible cycle

Cont.



facilities and appropriate levels of car parking, including disabled car parking and electric vehicle charging points. It is considered that the application fails to meet the requirements of these policies.

Parking and Congestion

The submitted TA states that an existing staff car park with access from Castlebar Road will be retained, and an additional disabled parking space is to be provided adjacent to Carlton Road. Anecdotally, it is understood that there is capacity for circa 10 staff within the existing parking area, and as such a minimum of 14 staff will be required to park elsewhere during the day which does not appear to have been considered.

In addition, no consideration appears to have been given as to where parents dropping off/picking up their children would be able to safely do so. Whilst parents of elder children may be comfortable in allowing their children to make their way from the car into school, it is unlikely that parents would be willing to do the same for pre-prep school age children. As such, parents would need to find somewhere to park and take their child into the school before returning to the vehicle. Similarly, at the end of the school day, all parents will likely be required to park whilst they wait for their child to come out of school.

Due to the narrow nature of Carlton Road, there is already inadequate space to allow for one car to pass another car that is in the process of manoeuvring into a parking space. Parents parking along Carlton Road, combined with the significant volume of traffic expected to travel along Carlton Road during drop-off and pick-up times will, therefore, undoubtedly exacerbate existing issues. At present, it is not uncommon for cars to have to reverse long distances to find passing points, an issue that will only worsen as a result of the development proposals and is of particular concern given the high number of children likely to be in the area. Evidence of existing operational issues along Carlton Road can be seen in the **Photographs 1 and 2** below.



Photograph 1: Ambulance unable to progress along Carlton Road due to oncoming traffic and the narrow nature of Carlton Road



Photograph 2: Existing Congestion along Carlton Road

In relation to the implementation of a bus layby, parking surveys were undertaken within a 400m walking radius from the site between 0600-2000 hours during a neutral mid-week school day. The on-street parking survey results are summarised in Tables 4.1 and 4.2 in the TA. As the installation of the proposed bus layby will remove nine spaces, the local road network had a minimum capacity of 24 spaces. Only five of these spaces, however, allow non-residents to park at any time throughout the day. The majority of spaces are for residents use only between the busiest hours (Mon-Fri 9am-5pm etc.) and no assessment has been undertaken to identify whether or not this

Cont.



is sufficient to accommodate the parking demand that will arise from the proposed development. Given that the TA calculates that 347 children will travel to/from the site by car, 342 vehicles will have no safe place to park and wait to drop off or pick up children. The only logical outcome can therefore be that these vehicles will cause significant congestion, delay and harm to road safety on the local road network, meaning the application has failed to meet the requirements of the NPPF and local policy.

The existing problems with car parking and congestion on several roads in close proximity to the site have been exacerbated by a series of recent nearby residential developments. The TA has failed to acknowledge these existing issues, nor does it make any assessment of future traffic growth likely to have occurred by the time of opening.

Along Pinewood Grove for example, there is already an existing shortage of privately-owned parking spaces for residents. Parents already use Pinewood as a pick up and drop off zone and residents have understandable concerns that the documented shortfall of spaces on the public highway network will result in a significant increase in the number of parents waiting/turning in private areas such as Pinewood Grove. Despite having controlled parking hours at the beginning and the end of the day, these measures have proved to be ineffective to the detriment of resident amenity.

Concerns have also been raised that Carlton Road is used by emergency services on a regular basis and is a particularly common route for fire engines travelling from Ealing Fire Station. The additional traffic along Carlton Road resulting from the development would have an adverse effect on already delayed response times and therefore cause detriment to a fundamental public service. Evidence of emergency response vehicles being delayed along Carlton Road is documented in **Photograph 1**.

Other

Table 6.3 in the London Plan states that for nurseries/schools (primary and secondary) (D1 use), a minimum of 1 long stay cycle space must be provided per 8 members of staff in addition to 1 long stay cycle space per 8 students, and 1 short stay space per 100 students. To accord with these standards a total of 86 cycle parking spaces should be provided. Ealing's Sustainable Transport for New Development Supplementary Planning Document seeks to have cycle parking in sheltered and secure units with pupil and staff cycle parking in separate units. Of the proposed 64 cycle spaces, the TA states that only 16 spaces will be covered. The split between staff and pupil parking spaces is also absent from the document. The SPD states that scooter parking may be provided in lieu of cycle parking for younger ages and whether or not the provision of 64 cycle spaces is in accordance with standards therefore depends on the number of nursery aged children at the school.

Finally, it is noted that a protected tree is present in the middle of the carriageway on Carlton Road, towards the Carlton Road/Castlebar Road junction. This forms a prominent feature of the local road network. The Outline Construction management and Logistics Plan submitted as part of the planning application has given no consideration to how construction/deliveries traffic will be managed to ensure that this historic and protected tree is not damaged during the construction stage, or by coaches thereafter.

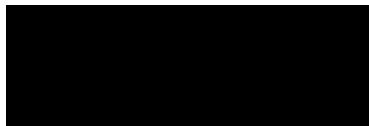
Overall, the Transport Assessment submitted to support the application lacks sufficient analysis of the highways impact that the consolidation of three sites would have onto one, as well as the impact that an additional 108 students would have on the local highway network. The TA fails to consider known existing highways issues and although parking surveys have been undertaken, they demonstrate the severe lack of available space for vehicles to park and/or wait on the local road network to pick up and drop off children. It is therefore considered that the planning application fails to meet the requirements of the National Planning Policy Framework, various London Plan

Cont.



policies and those within Ealing's Development Management DPD. I trust that these comments are of use and that they will be taken into consideration during the determination of the planning application.

Yours sincerely



■■■■ ■■■■

Principal Transport Planner
Paul Basham Associates

T: ■■■■■■

E: ■■■■■■ paulbashamassociates.com



Our Ref: GC/B0248/18
LPA Ref: 191182FUL

13th January 2020

■■■■
Planning Casework Officer – Team C
Planning Casework Unit
5 St Philips Place,
Colmore Row,
Birmingham
B3 2PW

Dear Ms ■■■■

URGENT – PLANNING COMMITTEE – Wednesday 15th January 2020 - Durston House School, 12-14 Castlebar Road, Ealing, London, W5 2DR (Reference: 191182FUL) – Planning Application for Loss of Playing Fields

I am writing to on behalf of the residents of Carlton Road, Pinewood Grove and Oak Tree Close who are extremely concerned that Ealing Council may resolve to grant planning permission on Wednesday 15th January for the loss of playing fields which would clearly be contrary to Ealing's, the Mayor of London's and National Planning Policy.

The current planning application that is to be considered at Committee on Wednesday 15th January 2020 is for:

“Redevelopment of the Durston House School Sports Ground (Carlton Road), consisting of the demolition of an existing single-storey sports pavilion and five x single-storey storage structures, the removal of two floodlit hardstanding tennis courts and the construction of a part single, part two and part three-storey school (540 pupils in reception and years 1-8), with associated boundary treatment, playing field and soft and hard landscaping; redevelopment of the existing Durston House School buildings, comprising, the change of use of 12-14 Castlebar Road from education use (Class D1) to residential use (Class C3) to create eight self-contained units (7 x 1 bed and 1 x 2 bed) and three townhouses (2 x 2 bed and 1 x 3 bed), including demolition of single-storey



garage and three-storey rear extension; the change of use of 26 Castlebar Road from education use (Class D1) to residential use (Class C3) to create five self-contained units (3 x 1 bed, 1 x 2 bed and 1 x 3 bed) and the change of use of 9 Longfield Road from education use (Class D1) to residential use (Class C3) to create one unit (1 x 5 bedroom)”

The application will be referred to the Secretary of State under section 77 of the Town and Country Planning Act 1990 as a result of THE TOWN AND COUNTRY PLANNING (CONSULTATION) (ENGLAND) DIRECTION 2009 as Sport England objects to the proposal.

The application clearly is contrary to National Planning Policy as set out in the National Planning Policy Framework. In particular, paragraph 97 applies. This states:

‘Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: • an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or • the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or • the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.’

To provide further information regarding how this application is contrary to National policy, I have attached the following to this letter:

- a) Link to the Officer’s Report to Committee;
- b) Copies of the three Planning objection letter that have been sent to the Council;
- c) Copies of the Highway objections letters that have been sent to the Council; and
- d) Copy of GLA and Sport England’s objection (attached to email) to the scheme.

Overall, the proposal is clearly contrary to the National Planning Policy and would request that the Secretary of State exercises his power under Section 77 if the Council on Thursday resolves to grant planning permission.

If any further information or clarification is required, please do not hesitate to contact me.
Yours sincerely

[Redacted Signature]

[Redacted Name]

Principal Consultant

[Redacted Email] walsingplan.co.uk





AIR POLLUTION SERVICES

St Dunstons House, Bedminster Down Road, Bristol, BS13 7AB
Tel: 01179 112434. Email: contact@airpollutionservices.co.uk

Air Quality Note: Durston House School, Ealing

Date: 14 January 2020



Quality Assurance

Client: Local Residents Group

Contact: Local Carlton Road Residents

Reference: S1000_A_2

Status: Final

Author: [REDACTED]

Date Published: 14 January 2020

Approver: [REDACTED]

Date Approved: 14 January 2020

This report has been prepared by Air Pollution Services Ltd on behalf of the Client, taking account of the agreed scope of works. Unless otherwise agreed, this document and all other associated Intellectual Property Rights remain the property of Air Pollution Services Ltd.

In preparing this report, Air Pollution Services Ltd has exercised all reasonable skill and care, taking account of the objectives and the agreed scope of works. Air Pollution Services Ltd does not accept any liability in negligence for any matters arising outside of the agreed scope of works.

Air Pollution Services Ltd shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only if Air Pollution Services Ltd and the third party have executed a reliance agreement or collateral warranty.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment. Air Pollution Services Ltd does not accept any responsibility for any unauthorised changes made by others.

Contact Details

Contact Name: [REDACTED]

Tel: [REDACTED]

Email: [REDACTED]@airpollutionservices.co.uk



AIR POLLUTION
SERVICES

Experts in Air Quality



Executive Summary

This note raises several significant concerns of the development known as Durston House School in the London Borough of Ealing, and justification for the Mayor of London to consider directly refusing the development. The key points raised are:

- Sufficient evidence has not been provided to demonstrate that adverse air quality impacts will not occur;
- The development does not comply with Policy 7.14B(c) of the London Plan, being 28% over the benchmark;
- Mitigation measures relating to air quality are based upon incomplete assessments and understated results and are therefore not adequate. No evidence has been provided to demonstrate that measures would actually result in air quality improvements;
- Sufficient evidence has not been provided to demonstrate the full extent of the effect of the development on climate change. Taking account of traffic emissions alone, the development will lead to an adverse impact on climate change and is therefore not compliant with the NPPF or Ealing's Climate Change Strategy;
- Proposed carbon offsetting has not been based on the full extent of the development's carbon footprint, nor over the lifetime of the development, and is therefore not adequate;
- The Target Fabric Energy Efficiency calculations provided, demonstrate that the energy strategy will result in a 191% exceedence of the Greater London Authority benchmark, and the application therefore does not comply with the Mayor's London Plan in relation to sustainable development, and is considered to not comply with Part L of Building Regulations by the time the development would be built.

1 Introduction

- 1.1 Air Pollution Services Ltd (APS) has been commissioned by a group of local residents to review the air quality evidence produced in connection with the proposed development of Durston House School at 12-14 Castlebar Road in the London Borough of Ealing. The development involves relocating the existing school premises to Carlton Road and expansion of the school to include an additional 108 pupils. The planning application also includes the conversion of the existing school buildings to residential use.
- 1.2 An Air Quality Assessment Report (AQAR) was produced by Air Quality Consultants Ltd (AQC, 2018) in support of the planning application. This included a qualitative assessment of the impacts of pollutant emissions from road traffic and the proposed on-site energy plant. It also included a construction dust risk assessment and an assessment of air quality neutrality, following the requirements of the London Plan. The AQAR concluded that the air quality effects of the development would be 'not significant' and it will be air quality neutral.
- 1.3 APS produced a review of the AQAR, raising a number of significant concerns pertaining to the assessment of air quality, air quality neutrality and climate change, and the potential risk of adverse effects that the development may have on human health and the environment (APS, 2019). An Air

Quality Response (AQR) to the review was subsequently produced by AQC (2019), from which several concerns remain, including non-compliance with the Mayor's London Plan.

- 1.4 The Greater London Authority (GLA) provided a consultee response (2019) stating that the Mayor considers that the application does not comply with the London Plan. One of the reasons given relates to sustainable development, for which the GLA requested further information to allow the carbon savings to be verified. The applicant has since produced a spreadsheet setting out the carbon emission performance of the proposed energy strategy for the development, but the results presented in the spreadsheet demonstrate non-compliance with the Mayor's London Plan and Part L of the Building Regulations, which is considered to be a significant concern.
- 1.5 This report sets out details of the concerns and justification for the Mayor to directly refuse the development.

2 Air Quality

- 2.1 The AQAR did not consider the air quality impacts of the spatial redistribution of traffic on the local roads. The impacts of vehicle emissions associated with the redistribution of traffic should have been considered at existing properties in the local area, especially close to the junction of Carlton Road and Castlebar Road. Without proper consideration of the changes in traffic, it is considered that the impacts of the proposed development have not been accounted for within the AQAR. In response to this being raised in the review, the AQR states that "*the Transport Assessment does not provide any details of current or likely future travel routes to the school*"; this simply means that an assessment of it could not be carried out by AQC based on the information available. No evidence has therefore been provided to demonstrate that adverse air quality impacts will not occur. Given the heavily congested area, potential adverse impacts may occur and should be considered in detail.
- 2.2 In addition, the Central London Ultra Low Emission Zone (ULEZ) is planned to be extended in October 2021, the boundary of which will be located near to the application site. The ULEZ puts strict limits on vehicles within the zone and may lead to displaced and congested traffic and a higher proportion of dirtier vehicles just outside the zone, where the development is located. This has not been taken account of within the AQAR and may lead to worse air quality for future residents and pupils than estimated.
- 2.3 Furthermore, there are a number of pollution sources associated with the development that may impact on local air quality that the AQAR did not fully assess, including boiler emissions, kitchen emissions, coach emissions and minibus emissions. Although some of these have since been responded to in the AQR, the responses do not provide evidence that local air quality will not worsen as a result of the development, or that when sources are considered cumulatively that significant impacts will not occur. Details of these concerns are given below:
 - The development will include a boiler plant which will release pollutant emissions, predominantly in the form of nitrogen oxides (NO_x), the emission rate of which will exceed the screening criteria set out in guidance jointly published by Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM). This screening criteria was designed to highlight to air quality professionals when a detailed assessment should be

carried out. It is important to note that adverse impacts may occur below the screening criteria, particularly where emissions occur close to locations of relevant exposure. There are residential properties (relevant exposure) within 20 m as well as the school itself, where adverse impacts may occur. The AQR responded to this concern, stating that impacts are likely to be negligible, but without giving any justification. The AQAR and AQR also do not consider any short-term impacts, which may occur in close proximity to the exhaust flues or at ventilation inlet locations. Without a detailed assessment of the boiler plant emissions, it is not possible to state that children, who are particularly sensitive to air pollution, will not be exposed to poor air quality conditions.

- NO_x emissions may also be released from the proposed school kitchen. The kitchen will likely include gas cookers and are likely to be operated every school day, catering for many students. Although kitchen combustion processes are not typically included in air quality assessments, while operating, the combustion of gas will release a small portion of NO_x, which may contribute (in combination with other sources) to elevated nitrogen dioxide (NO₂) concentrations in the local area. This has not been considered in the AQAR or AQR, although, as stated it is not typical to include these emissions sources, but at a sensitive site like a school it may be prudent to account for kitchen emissions.
- The development will also lead to an increase in coach and minibus trips, pollutant emissions from which may lead to a worsening of local air quality. In addition to emissions during travel, these vehicles are likely to idle with engines on for much of the time. While idling, the nearest sensitive locations would be the school and some flats on the opposite side of the road, which house disabled persons. Both locations are considered highly sensitive to air quality. Although these emissions may be screened out against current guidance, it should be acknowledged that guidance does change over time and that sensitive exposure will occur directly adjacent to the coaches and the guidance doesn't preclude the need to assess such emissions although it is unusual that it is explicitly modelled.

3 Air Quality Neutrality

- 3.1 The GLA's Supplementary Planning Guidance (SPG) on Sustainable Design and Construction (GLA, 2014b) provides details on delivering some of the priorities in the London Plan. Section 4.3 covers "*Air Pollution*". It defines when developers will be required to submit an air quality assessment, explains how location and transport measures can minimise emissions to air, and provides emission standards for a range of stationary combustion plant, and provides guidance on how Policy 7.14B(c) of the London Plan relating to "*air quality neutral*" should be implemented.
- 3.2 The Air Quality Neutral (AQN) assessment involves comparing building and transport-related nitrogen oxides (NO_x) and PM₁₀ emissions associated with the development against emission benchmarks for properties of a similar nature within Greater London. A small incremental change can, cumulatively with other developments, worsen air quality. Following Policy 7.14B(c) of the Mayor's London Plan, the development should thus be at least 'air quality neutral' and not cumulatively lead to further deterioration of existing poor air quality in Greater London.

- 3.3 Air pollution has negative impacts on the health of people, especially vulnerable members of the population, such as the elderly, children and people already suffering from pre-existing health conditions (including respiratory and cardiovascular conditions (WHO, 2013)). Evidence suggests that it can cause permanent lung damage in babies and young children (Royal College of Paediatrics and Child Health, 2016) and exacerbates lung and heart disease in older people (Simoni, 2015). It is therefore extremely important to ensure that both exposure to poor air quality is avoided (especially for children) and developments are at least ‘air quality neutral’.
- 3.4 The AQR admits that the AQN assessment provided within the AQAR contained errors. These were since revised in the AQR. With the revisions, the development exceeds the GLA’s emission benchmark for transport emissions by 5.4% and is therefore not air quality neutral and does not comply with the Mayor’s London Plan.
- 3.5 The AQR downplays the extent of the exceedence by calculating the annual car trips generated by the development upon the number of attending pupils when the development will first open. This flagrantly ignores the fact that the development would have permission for progressive growth from 432 pupils up to 540 pupils, with the final number generating a significantly higher trip rate. Taking account of the full pupil attendance, the development exceeds the GLA’s emission benchmark for transport emissions by 28.4%, well above the benchmark for air quality neutrality.
- 3.6 In instances where an air quality neutral benchmark is exceeded, the guidance recommends that action is required, either locally or by way of offsetting. The AQR states that the development will include a travel plan and that it *“should be implemented to provide mitigation to assist the development in meeting the requirements of the air quality neutral policy”*. The application also proposes a Section 106 contribution of £1,700 towards air quality monitoring and improvement measures. There is sufficient air quality monitoring already in place in the local area and throughout the Borough; additional monitoring will not lead to any improvement in local air quality. The remaining fund for improvement measures is of such a low value that no significant improvements in air quality can be achieved with it. These mitigation measures are based upon a 5.4% exceedence. However, given that the development may, in fact, exceed by 28.4%, more stringent mitigation measures should be implemented, or the development refused, to avoid further deterioration of existing poor air quality in Greater London.
- 3.7 Consideration should also be given to whether such mitigation measures (either local or by way of offsetting) would demonstrably lead to the development becoming air quality neutral, as required by the Mayor’s London Plan.

4 Climate Change

- 4.1 The NPPF includes a commitment to ensure consideration is given to climate change within the planning process. In particular, the NPPF includes an environmental objective *“to contribute to protecting and enhancing our natural, built and historic environment; including...mitigating and adapting to climate change, including moving to a low carbon economy”*.
- 4.2 The Council have also published a Climate Change Strategy which sets out a series of ten-year goals with the overall objective to *“reduce the borough’s contribution to climate change”*. This strategy

states that “Climate change is a global challenge but will have local impacts and thus needs to be tackled from all levels” and includes the objective to “reduce emissions resulting from transport through transport planning”. The strategy also states that “the Council’s LDF [Local Development Framework] plans to address climate change through the borough’s planning policy. The LSP [Local Strategic Partnership] will work with developers to ensure climate change is considered when submitting planning proposals and during the development and construction stage. Compliance with planning policy requirements by developers will ensure successful delivery of the objectives set out in the LDF”. In determining the permission of the application, consideration should thus be given to the effects on climate change.

- 4.3 The planning application has not provided material evidence to demonstrate whether the proposed development will result in benefits to climate change. Given that the proposed development will increase vehicle trips, reduce green space and involve the construction of new buildings, it is highly likely that adverse impacts on climate change will occur. The application proposes a Section 106 contribution for carbon offsetting; this has not been based on the full extent of the development’s carbon footprint, nor over the lifetime of the development, and is therefore not adequate.
- 4.4 The existing site is a green open space with many mature trees and grass, which are currently removing CO₂ from the atmosphere. The application will, however, build over this space, losing trees and replacing grass with plastic artificial grass; resulting in both environmental habitat loss for local wildlife and a negative carbon footprint, leading to an adverse effect on climate change. The application does include a Section 106 contribution for off-site tree planting, but these trees will not reach the carbon uptake capacity of the existing trees for many decades and during this period the development will have an adverse impact on climate change.
- 4.5 The development will also generate 148 additional vehicle movements per day on the local road network (54,020 movements per year), all of which will cause emissions of greenhouse gases, such as carbon dioxide (CO₂), to be released into the atmosphere (whether directly or indirectly). Greenhouse gases, such as CO₂, play a key role in climate change and Ealing Council have recognised the importance of reducing emissions and mitigating and adapting to climate change. To provide an estimation of the level of greenhouse gases created, emissions of CO₂ from the additional vehicles have been calculated using Defra’s Emission Factor Toolkit (v9.0). This requires several inputs in addition to the vehicle movements, including the percentage of heavy-duty vehicles (which has been assumed to be zero i.e. they are small passenger vehicles only), the speed (which has been assumed to be 30 mph on average), and the distance travelled. The distance over which vehicles travel is unknown but it is considered reasonable to assume it would likely be more than 1 km, since people would likely use other modes if closer, and up to 10 km; the calculation has thus been calculated for the range of 1-10 km. The annual CO₂ emissions generated by the additional development traffic is thus likely to be between 3-26 tonnes/annum; the development will therefore contribute adversely to climate change and oppose the NPPF and Ealing’s Climate Change Strategy. This only considers CO₂ emissions from traffic; there will also be significant contributions from the on-site energy plant as well as direct and indirect contributions during the construction phase, with the total carbon footprint will being substantially higher.
- 4.6 With regards to the on-site energy plant, the Greater London Authority (GLA) provided a consultee response (2019) stating that the Mayor considers that the application does not comply with the

London Plan in relation to sustainable development, for which the GLA requested further information to allow the carbon savings to be verified. The applicant has since produced a spreadsheet setting out the carbon emission performance of the proposed energy strategy for the development. This includes a calculation of the Target Fabric Energy Efficiency (TFEE), for which the development is required to meet a maximum of 54 kWh/m³. The development, however, has an efficiency of 159 kWh/m³, 191% worse than the requirement. The development therefore does not adhere to the Mayor's London Plan.

- 4.7 This calculation is intended by the GLA to reflect the decarbonisation of the electricity grid, which is not currently taken into account by Part L of Building Regulations. The emission factors used in the calculation will form part of the new Part L of Building Regulations, for which the consultation is due to close this month. It is therefore considered, that by the time the development is being constructed it will not comply with Part L of Building Regulations.

5 Summary

- 5.1 Based upon the evidence submitted in support of the planning application for the proposed development of Durston House School in the London Borough of Ealing, a number of significant concerns have been raised regarding potential adverse impacts on air quality, air quality neutrality and climate change.
- 5.2 This note has highlighted several concerns regarding the validity of the AQAR for the application, giving details of how potential adverse impacts have not been addressed, including the spatial redistribution of traffic due to the development and the impact of the extended ULEZ.
- 5.3 The air quality neutral assessment has been demonstrated to significantly exceed the GLA's benchmarks for transport emissions by 28.4%, substantially higher than that provided in the AQR. More stringent mitigation measures should be implemented, or the development refused, to avoid further deterioration of existing poor air quality in Greater London. Consideration should also be given to whether such mitigation measures (either local or by way of offsetting) would demonstrably lead to the development becoming air quality neutral, as required by the Mayor's London Plan.
- 5.4 It has also been demonstrated that the development will have a substantial carbon footprint, with the additional vehicle emissions generated by the development creating 3-26 tonnes of CO₂ per annum and the Target Fabric Energy Efficiency of the on-site energy plant being 191% worse than the requirement. The development therefore goes against the NPPF and Ealing's Climate Change Strategy, does not adhere to the Mayor's London Plan and is considered to not comply with Part L of Building Regulations.
- 5.5 Prior to the Planning Committee due on the 15th January 2020, the Council has published their recommendation of planning permission within the agenda documents (Ealing Borough Council, 2019). The recommendation is to grant planning permission on the basis that *"the overall benefits of the proposed development are considered to outweigh the limited harm"*. The recommendation, however, does not discuss any of the concerns raised and cannot take account of the harm that the development will cause to human health or the environment, since these have not been sufficiently

considered, assessed nor mitigated. It is therefore inappropriate for planning permission to be granted on this basis.

- 5.6 The proposed development will have adverse cumulative impacts on air quality throughout Greater London and significant adverse effects on climate change. Serious consideration therefore needs to put forward as to what additional mitigation measures would be appropriate or whether the development ought to be directly refused planning permission.

6 Glossary, References and Appendices

References

- APS. (2019). *Air Quality Review: Durston House School, Ealing, Report Reference J1003_A_1*.
- AQC. (2018). *Air Quality Assessment: Durston House School, Castlebar Field, Ealing, Report No. J3112A/1/F1*.
- AQC. (2019). *Air Quality Response Note: Durston House School, Report No. J3112B/1/F2*.
- Ealing Borough Council. (2019). *Planning Committee Agenda*.
- GLA. (2014b). *Sustainable design and construction supplementary planning guidance*.
- GLA. (2019). *GLA Stage 1 Comments 3116963, Reference GLA/4597/01*.
- Royal College of Paediatrics and Child Health. (2016). *Every breath we take - The lifelong impact of air pollution*. Retrieved from <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>
- Simoni, e. a. (2015). *Adverse effects of outdoor pollution in the elderly, Journal of Thoracic Disease*. Retrieved from <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4311079/>
- WHO. (2013). *World Health Organisation, 'Review of evidence on health aspects of air pollution - REVIHAAP Project'*. Retrieved from http://www.euro.who.int/__data/assets/pdf_file/0004/193108/REVIHAAP-Final-technical-report-final-version.pdf?ua=1



Air Pollution Services Limited is a company registered in England and Wales with Company Number 11808160.

Our Ref: GC/B0248/18
Your Ref: 191182FUL

17th December 2019

■■■■■
London Borough of Ealing
Planning Service
4th floor, Perceval House
EALING
W5 2HL

Dear Mr ■■■■■

**FURTHER OBJECTION TO PLANNING APPLICATION – Durston House School
12-14 Castlebar Road Ealing London W5 2DR (Reference: 191182FUL)**

Further to my letters dated 24th April 2019 and 15th July 2019 and the various information that has been published, I would like to make both further objections (including highlighting issues which have not been addressed) and also to raise concerns regarding how this application has been considered. The Council has adopted an approach that seeks to grant consent when the proposal has substantial objections and is clearly contrary to both National Policy given Sport England's objection and local policies of both the Greater London Authority (GLA) and of the London Borough of Ealing. The GLA have indicated at stage 1 that the application should be refused. The draft London Plan (July 2019) should now be given weight as it is post examination.

Context

The legal test for the Council is set out in Section 38(6) Planning and Compulsory Purchase Act 2004 which states: '...the determination must be made in accordance with the plan unless material considerations dictate otherwise'. The duty is therefore for the Council to exercise its judgement and consider many (sometimes) conflicting issues to decide whether planning permission should be granted. This will mean examining the Development Plan and taking material considerations which apply to the proposal into account. These things must be properly considered otherwise the decision of whether or not to grant permission may be unlawful. This process is often termed the "Planning Balance".



Below I will set out how the proposal clearly is contrary to the Development Plan and how the benefits identified are overstated and are not sufficient to outweigh the significant harm that results from the proposal.

The proposed development also fails the tests in the Council's pre-application advice of August 2017 (Ref: 172188PAC), which stated:

"The proposed re-development of the school sports ground would constitute a Departure from the Development Plan due to the existing site designations. Notwithstanding this, it is considered that justification for the consolidation of Durston House school to be located predominantly towards the south of the site may be established, based on the ability to successfully demonstrate that the proposal would cause minimal impact to the provision of sports and recreation facilities, would enhance the quality of sports and recreation facilities on-site, would provide improved community access, would not cause an unacceptable impact upon the openness of the site and would enable the redundant school buildings to be converted to residential use."

1) Significant harm

a) Permanent Loss of Community Open Space

The overall approach to development is set out in the "Development Strategy 2026 Development Plan Document (April 2012). Policy 1.1 (e) states the vision for Ealing is:

"To be a healthy and safe place to live and ensure that the necessary physical, social and green infrastructure and services as identified in the Infrastructure Delivery Plan are provided and enhanced in the borough."

This is explained further as follows:

"The pattern of growth corridors and residential hinterlands overlays a pattern of green spaces and green corridors, and 'greening' (e.g. addressing open space deficiency) is a vital element of the strategy. Indeed, development is expected to yield resources to enhance and improve the quality of green and open space. Ealing's reputation as a green borough will be improved as the Development Strategy is implemented and biodiversity will increase during this period. Open spaces also provide an oasis of calm and tranquillity for residents from the bustle of city life, beneficial to health. Preserving these quiet areas will protect this vital but overlooked amenity."

The protection of "Community Open Space" is an important part of the Council's strategy. The protection is set out in both the Ealing Development Strategy DPD and the Development Management Plan.



The harm from the loss of open space, sports provision and playing field would be significant as the existing open space is in an existing area of deficiency and once lost cannot be replaced. The proposal would clearly be contrary to policies 3.19 and 7.18 of London Plan, S3, S5 and G4 of the draft London Plan, and policies 1.1 (e), and 5.6 of the Development Strategy DPD, 2.18 of the Ealing Development Management DPD and should be refused on this ground.

b) Bad for traffic and congestion

The existing school has a dispersed impact given it is on three separate sites. Travel to the school is car based. A survey in February 2018 found 64% of pupils (276 pupils) and 27% of staff (24 staff members) currently travel to the site by car. The new school will concentrate the impact on Carlton Road.

The relocation of the site would generate an additional 296 trips during the drop-off periods and pick-up periods. This brings the total no. of vehicles travelling along Carlton Road to 883 in the drop off period (+50%) and 697 in the pick-up period (+74%). Given existing highway issues in Carlton Road, the additional trips would have a detrimental impact on highway and pedestrian safety. The concentration would result in increased congestion and gridlock, higher levels of CO2 emissions and air pollution and greater risks to pedestrian safety.

The applicant has tried to mitigate the significant impact but as the GLA have identified: “the applicant must address transport issues with respect to; vehicle parking, design and quantum, blue badge parking, cycle parking design and quantum and school travel plan”.

Insufficient cycle parking is provided: only 16 covered cycle spaces are provided out of 64 spaces. This is insufficient for 480 students and 90 members of staff. Car parking is provided for staff rather than encouraging them to use public transport or cycle facilities. Any success at implementing a travel plan to change car drop offs to cycle & scooter use as suggested would require a designated safe space (eg cycle lane) in all the surrounding roads. Also, consideration should be given to the catchment of the school and the age of the children as it will not be possible for younger children to use non car based modes.

All of this highlights that the impact will be car based rather than on other modes of transport. The proposed school travel plan is aspirational and is simply unrealistic. If targets are not met, congestion will simply be even worse.

Carlton Road is an important route for fire crews attending incidents. Any additional congestion will have a direct impact on the speed of attendance at incidents within Ealing. There will be a direct impact in terms of access to this site in the event of a fire.

The proposal would therefore be contrary to policies 6.1, 6.3, 6.9, 6.10, 6.11, 6.12, 6.13 and 6.14 of the London Plan, Policy 6.13 of Ealing’s Development Management DPD and Ealing’s Sustainable Transport for New Development SPD.



c) Significant impact on air quality

Policy GG3 Creating a healthy city of the Draft London Plan 2019 requires new development to: “..seek to improve London’s air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution.”

There would be a significant impact on air quality from the impact of the significant additional traffic, commercial vehicles for deliveries, refuse & recycling and coach journeys – none of these currently exist on this site.

The development is clearly not air quality neutral in terms of traffic. There would be a significant impact given that congestion and cars are a major cause of air quality impacts. The proposal would therefore be contrary to policy 7.14 of the adopted London Plan and SI1 of the draft London Plan.

d) Lack of affordable housing

The objection made in April 2019 included detailed concerns about the Financial Viability Assessment undertaken by Davis Coffey Lyons. Not surprisingly, the gross development value has been underestimated. The value of the residential scheme is in excess of £15 million. There is no value attached to the new school. The report identifies that the scheme has a surplus of £4,879,260.

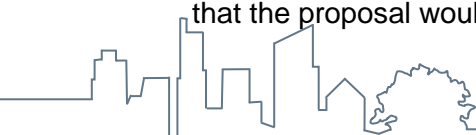
I have repeatedly requested the Council’s own assessment of the FVA to allow scrutiny. No details have been provided.

The scheme does not propose any affordable housing. The scheme can and should provide affordable housing. Clear evidence has been provided that the scheme would generate a significant surplus. The development would therefore be contrary to policy 3A of the Development Management DPD. Furthermore, it would be contrary to policy DF1 of the Draft London Plan and policy 3.12 of the adopted London Plan

e) Significant Visual Impact with the Loss of Trees

The Council pre-application advice of August 2017 stated: “Policy 5.10 of the Local Plan states where trees are proposed to be removed, re-planting is required on the basis of no net loss of amenity. While the extent and location of the planting need not necessarily be the same afterward as it was before, the quality and type of amenity offered (based on CAVAT value) should be the same or better.”

The proposal includes the removal of 45 trees which form an important function on this open space. This is justified by replacement planting but no details of the size of the replacement trees are provided. Overall, it is impossible to assess whether Capital Asset Valuation of Amenity of Trees (CVAT) is an improvement. Without this information, it must be concluded that the proposal would be contrary to policies 5.10 and 7.21 of the adopted London Plan.



f) Loss of Bats and Ecology from the site

The applicant's stage 1 indicates there is little bat roost potential. The survey was carried on at the end of October 2017. Evidence from resident observation is that the trees are used as bat roosts. No survey has been undertaken. Furthermore, existing buildings could be used as bat roosts. The proposal would therefore be contrary to policy 5.6 from the Development Strategy DPD, policy S6 from the Draft London Plan and policy 7.19 of the adopted London Plan.

2) Insufficient benefits to outweigh harm

The benefits of the scheme are set out in the planning statement that was submitted with the application. The benefits are: a) increased community use of sporting facilities; and b) improved and additional school provision.

a) Increased Community Use of Sporting Facilities

The Council's pre-application advice of August 2017 stated: "The planning application would need to justify any loss in open space by demonstrating that the redeveloped site would ensure significantly improved community access to high quality open space facilities, while also demonstrating the proposal would cause minimal impact to the openness of the site."

The playing fields and open space once lost will be gone forever. The tennis courts are already accessed by the public and the open space and playing fields could be used by the community. This will be lost.

The new facilities that will be available on a very limited basis in no way provides improved community access.

The draft Community Use Agreement document indicated that school facilities will be made available to clubs closely linked to Durston House School. The school propose to make spaces available at other times through an online booking system that in practice will be a real barrier to community use. Use will be controlled and will not be available to the community. Use will be at the discretion of the school to those organisations it chooses.

Sport England have even rejected the creation of indoor facilities as they seek the protection of outdoor playing fields. This is also the Ealing's policy in policy 5.4 of the Development Strategy DPD.

b) Improved and additional school provision

The existing school is successful. The Planning Statement submitted with the application states: "Durston House is a leading London preparatory school, with a long history and a fine record of preparing boys for Senior School and future success. The school began life in 1886



and has, from its earliest years, enjoyed a strong academic reputation and encouraged keen sporting and lively cultural interests.”

It is claimed that: “The opportunity to consolidate the school onto one site would bring many advantages, enabling Durston House to continue the high level of educational provision for children within the Borough of Ealing for many years to come.”

Given that the school is already successful that need for improving facilities is overstated. The council has a statutory duty to ensure that there are sufficient school places. The council is able to do this by extending existing schools but in the case of new schools the national policy assumptions is that these are academies or free schools which are state schools funded directly by central government rather than the council. It is widely recognised that there is a need to deliver additional primary and secondary school places in Ealing to accommodate an increase in demand, having regard to the rising birth rate and school roll projections. To achieve this the Council produced specific planning guidance titled: “Planning for Schools DPD”. Private school provision is separate to this and is not covered by the DPD.

The new school would increase the capacity from 432 to 540, providing 108 additional places. These additional places should not be given any weight in determining this application as they are additional places to those that are planned by the Council to meet Ealing residents needs.

No argument or assessment has been made regarding what alternatives have been examined if the need is so great. A previous application at Swynycombe Avenue (Ref: APP/F5540/A/00/1048732) was refused and dismissed at appeal. Do these reasons still apply or are they applicable on the Carlton Road site ?

Conclusion

Overall, the proposal is clearly contrary to the Development Plan and should be refused for the reasons detailed in the previous letters of 24th April 2019 and 15th July 2019. It is disappointing that the scheme is being programmed to Committee even though the scheme fails to address the Council’s pre-application advice and both the GLA and Sport England object. The scheme should simply be refused.

If any further information or clarification is required, please do not hesitate to contact me.

Yours sincerely

[Redacted Signature]

[Redacted Name]

[Redacted Title]

[Redacted Email] walsingplan.co.uk



Our Ref: GC/B0248/18
Your Ref: 191182FUL

14th January 2020

■■■■■
London Borough of Ealing
Planning Service
4th floor, Perceval House
EALING
W5 2HL

Dear Mr ■■■■■

**FURTHER OBJECTION TO PLANNING APPLICATION – Durston House School
12-14 Castlebar Road Ealing London W5 2DR (Reference: 191182FUL)**

Further to my letters dated 24th April 2019, 15th July 2019 and 17th December 2019, I would like to make further objections following the publication of the Committee Report, the draft S106 agreement and the Council's Assessment of the submitted Financial Viability Assessment (FVA).

More Affordable Housing could be provided and should be provide on site

The assessment set out in the Committee Report fails to take account of the detailed concerns raised by Davis Coffey Lyons that was included in my objection letter of 24th April 2019. Now that the Council's Assessment of the submitted FVA has been provided, I would like to make the following further objections that indicate that more affordable housing could be delivered on this site either as a financial contribution or on-site.

On-site

The Council fails to identify why the affordable housing can't be delivered on site. There are clearly no exceptional circumstances. The relevant policy is policy H5 B. of the Draft London Plan states: "Affordable housing should be provided on site. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances." This updates the on-site requirement set out in policy 3.12 C of the adopted London Plan.



Gross Development Value (GDV)

The GDV for the scheme undervalues the residential scheme and the value of the new school.

The GDV for the residential element of the scheme should be based on £910 per sq ft given:

“In my view, GE have underestimated the quality of the location of the subject properties. The buildings are all located within very close proximity of Ealing Broadway station which is a major transport hub and which will soon benefit from Crossrail (Elizabeth Line) communications. This will expedite travel times in particular to the City and Canary Wharf, rendering Ealing an even more attractive residential district for those working not only in the West End but also in the financial districts to the East of London. It is reasonable to expect that the desirability of residential properties in close proximity to Ealing Broadway will improve leading to higher values in the area.

I enclose at Appendix 1, my own calculation of expected resale values in respect of the properties as at today's date set this out alongside a reproduction of the GE figures.

I consider that the residential properties have a GDV of £15,615,000 which equates to an overall value of approximately £910 per sq ft overall.”

For the school, Gerald Eve assume the school would have a value of £23 million. Applying just £600 sq ft means the school would have a value of in excess of £28 million.

Profit

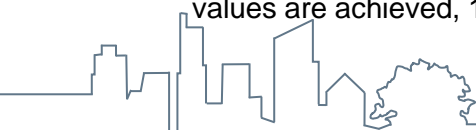
The level of profit from a scheme that is required depends on the risk associated with the development. The fact that the scheme generates profit for a new school and there is little risk to the delivery should be taken into account. The advice from Davis Coffey Lyons is:

“It could be argued that in the context of this particular project, the profit to Durston House will be in the form of a new purpose-built school facility and that they should not necessarily expect to be looking to reflect any developers profit on the residential component of the scheme. In these circumstances, the profit shown in their calculation could be added to the surplus available for affordable housing.”

Conclusion

As a result of the above factors, this scheme can generate more affordable housing. It is estimated the surplus is in excess of £4 million rather than the £1 million being offered. This level could be provided on-site.

The Council accepts that more could be provided but has simply asked for a review mechanism. No details of the review mechanism are provided. If for instance increased values are achieved, 100% of the uplift should go to the Council to deliver affordable housing.



Adverse impacts on air quality, air quality neutrality and climate change

A detailed note on Air Quality was submitted from Air Pollution Services in June 2019 and was included in a previous objection to the scheme. This provided an assessment of the Air Quality Assessment Report (AQAR) that was produced by Air Quality Consultants Ltd (AQC, 2018) in support of the planning application. The results of this has not been reviewed. No detail has been provided of how the Council's Energy and Sustainability Consultant has raised no objection.

Further to the conclusions set out within the Committee Report, a further note regarding the impact on air quality, air quality neutrality and climate change has been provided. This is attached to this objection. The key points raised are:

- “• Sufficient evidence has not been provided to demonstrate that adverse air quality impacts will not occur;
- The development does not comply with Policy 7.14B(c) of the London Plan, being 28% over the benchmark;
- Mitigation measures relating to air quality are based upon incomplete assessments and understated results and are therefore not adequate. No evidence has been provided to demonstrate that measures would actually result in air quality improvements;
- Sufficient evidence has not been provided to demonstrate the full extent of the effect of the development on climate change. Taking account of traffic emissions alone, the development will lead to an adverse impact on climate change and is therefore not compliant with the NPPF or Ealing's Climate Change Strategy;
- Proposed carbon offsetting has not been based on the full extent of the development's carbon footprint, nor over the lifetime of the development, and is therefore not adequate;
- The Target Fabric Energy Efficiency calculations provided, demonstrate that the energy strategy will result in a 191% exceedence of the Greater London Authority benchmark, and the application therefore does not comply with the Mayor's London Plan in relation to sustainable development, and is considered to not comply with Part L of Building Regulations by the time the development would be built..”

Overall, it is clear that the proposal would result in significant harm in terms of air quality and climate change and on these grounds the application should be refused.

Adverse impact on highway and pedestrian safety

The assessment in the Committee report fails to take account of the following issues:

1. As outlined by TfL and Greater London Authority (GLA), the proposed development should be car-free (excluding the provision for blue-badge holders).



Policy T6 Part A states that “car-free development should be the starting point for all development proposals that are well-connected by public transport”. The provision of on-site parking undermines the aims of this policy and encourages travel by unsustainable modes. Requiring parking for staff retention does not mean the policies should be ignored.

2. The Proposed development will significantly increase the volume of pedestrian and vehicular traffic along Carlton Road subsequently impacting on levels of air pollution. An increase in traffic along an already congested road combined with a high volume of pedestrian movements raises safety concerns, especially given the age demographic of pupils. The proposals to relocate the school would result in large volumes of children walking/cycling/scootering past the driveways to the residential properties. As outlined before, visibility from the residential driveways is already limited by on-street parking, the curvature of the road and obstructive vegetation. As a result, vehicles are unable to see pedestrians coming until they are edged out onto the pavement. Anecdotal evidence indicates that the limited extent of visibility achievable from the residents driveways has already led to several near-misses with young children which raises a serious safety concern. Adding increased pedestrian, scooter and cycle traffic to an already unsafe scenario puts the safety of all road-users at risk and must be considered during the determination process.

3. It is understood that all deliveries/servicing will take place outside of school-hours(07:00-22:00). Assuming that deliveries including catering etc. would need to take place before the school day begins, this will likely mean deliveries taking place early in the morning therefore causing disruption to local residents during anti-social hours.

4. The coach bay is located adjacent to the vehicular entrance to the garage of 19 Carlton Road and the pedestrian entrance to the pre-prep element of the development. Coaches parked in this location will reduce the extent of visibility achievable both for pedestrians crossing the road and vehicles emerging from the garage. The details of the proposed coach bay therefore must be examined and fully considered prior to a decision being made and, on this occasion, it is not considered appropriate to secure the details of the design via condition given the safety implications.

5. Where contributions towards highways improvements have been requested, the applicant has argued that “10% of pupils walk to the school, so there could be an additional 11 pupils walking on the local footways and crossing local roads. A sum of £360k seems entirely disproportionate to the increase in footfall in the area.” Currently, the school has 360 students and the proposed development has a capacity for 540 students, equating to an increase of 180 pupils. Based on the modal split outlined within the TA which indicates that 10% of pupils currently walk to / from school, it has been calculated that the proposed development would lead to an additional 18 pupils walking on the local footways. Moreover, the applicant’s statement is in direct

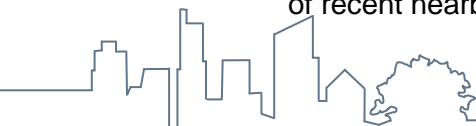


contradiction to their assertion that reducing car trips to/from the site will be the primary objective of the new Travel Plan and that the inclusion of infrastructure such as shower facilities will be successful in improving the multi-modal split once the new school is operational. If the Travel Plan is to be successfully implemented, then the number of additional pupils using the local footways and crossing facilities would be expected to be much greater than an increase of 11. It is not satisfactory to suggest that the impact of the development on congestion and parking availability will be limited due to the modal shift that may be achieved through the implementation of a Travel Plan, but equally state that limited pedestrian improvements are required because only a small percentage of pupils currently walk to school. The delivery of pedestrian infrastructure improvements are therefore considered to be crucial, particularly given the applicant has agreed in paragraph 18 of 'Durstons House School: Transport Comments / Queries' that there will be increased pressure on parking and an increase in vehicle movements in the area to the detriment of the road network if the current modal split remains unaltered.

6. In the current situation, vehicles travelling along Castlebar Road(B455) to the Pre-Prep and Main school sites are not required to turn right across oncoming flows of vehicle traffic. This helps to maintain a steady flow of traffic along a well-used route. The consolidation of the three sites onto Carlton Road would mean that all cars which currently travel southbound along Castlebar Road would be required to turn right onto Carlton Road. It is noted that whilst a right-turn lane is provided at the Carlton Road/Castlebar Road junction, its narrow width means that vehicles waiting to turn right still occupy part of the main southbound lane of traffic and, therefore, disrupt the flow of traffic along Castlebar Road. During the AM and PM peaks the high volumes of traffic carrying out this manoeuvre is likely to cause significant disruptions to the operation of the local road network, to which any consideration is absent in the submitted Transport Assessment.

7. In previous objection letters from Paul Basham Associates it was highlighted the TA's lack of consideration as to where parents can park whilst dropping off/picking up their children from school. In relation to this concern it has also been brought to my attention that parent and teacher meetings happen throughout the term in the evenings from 6pm onwards and that parts of the site will also be open to the public for amenity use. The parking survey undertaken as part of the TA identifies that following the implementation of the coach bay on Carlton Road, a minimum spare capacity of 5 'Permit Holders or Pay by Phone' spaces would be provided along Carlton Road. This level of spare capacity is insufficient to absorb the demand that will arise from the school, particularly in the evenings when residents demand for spaces is the highest. No consideration has been given to how this additional demand would be accommodated.

8. There are known to be existing problems with car parking and congestion on several roads in close proximity to the site which have been exacerbated by a series of recent nearby residential developments. For example, there is an existing shortage



of privately owned parking spaces for residents on Pinewood Road and understandable concerns have been expressed that such a significant shortfall of spaces to wait on the public highway network would result in parents waiting/turning in private areas to the detriment of resident amenity.

9. Concerns have also been raised that Carlton Road is used by emergency services on a regular basis and is a particularly common route for fire engines travelling from Ealing Fire Station. The additional traffic along Carlton Road resulting from the development would have an adverse effect on response times and therefore cause detriment to a fundamental public service

10 The scheme reserves the location of cycle and scooter parking to a condition. There is not sufficient space on site to provide this level of provision. It should be demonstrated that this level of provision could actually be provided.

11 The scheme fails to address the highway impact of the extra coaches and minibuses that currently housed on their site at 26 Castlebar Road on both Carlton Road and on the residents in Hounslow. Coaches will be required to take children to the school but also to Swynycombe Avenue playing fields.

Overall, the above concerns highlight that the proposed development would result in significant harm to highway and pedestrian safety.

Loss of Trees and Landscaping

The Arboricultural Impact Assessment (AIA) submitted with the application indicates that there would be significant tree loss as a result of this application. The following trees that the Council have identified as being particularly important for protection through a Tree Preservation Order are to be lost:

- 694 T4
- 694 T15

The AIA identifies the removal of 45 trees which form an important function on this open space.

No details of the CVAT value of trees have been provided. No assessment of the harm from the loss has been provided. Providing a contribution of £979 is not sufficient as this would only purchase one small tree. The proposal would be therefore be contrary to policies 5.10 and 7.21 of the London Plan



Conclusion

Overall, the proposal is clearly contrary to the Development Plan and should be refused for the reasons detailed in the previous letters of 24th April 2019, 15th July 2019 and 17th December 2019. It is disappointing that the scheme is being programmed to Committee even though the scheme fails to address the Council's pre-application advice and both the GLA and Sport England object. The scheme should simply be refused.

If any further information or clarification is required, please do not hesitate to contact me.

Yours sincerely

[Redacted Signature]

[Redacted Name]

Principal Consultant

[Redacted Email]@walsingplan.co.uk



Our Ref: GC/B0248/18
Your Ref: 191182FUL

14th January 2020

■■■■
London Borough of Ealing
Planning Service
4th floor, Perceval House
EALING
W5 2HL

Dear Mr ■■■■

**FURTHER OBJECTION TO PLANNING APPLICATION – Durston House School
12-14 Castlebar Road Ealing London W5 2DR (Reference: 191182FUL)**

Further to my letters dated 24th April 2019, 15th July 2019 and 17th December 2019, I would like to make further objections following the publication of the Committee Report, the draft S106 agreement and the Council's Assessment of the submitted Financial Viability Assessment (FVA).

More Affordable Housing could be provided and should be provide on site

The assessment set out in the Committee Report fails to take account of the detailed concerns raised by ■■■■ that was included in my objection letter of 24th April 2019. Now that the Council's Assessment of the submitted FVA has been provided, I would like to make the following further objections that indicate that more affordable housing could be delivered on this site either as a financial contribution or on-site.

On-site

The Council fails to identify why the affordable housing can't be delivered on site. There are clearly no exceptional circumstances. The relevant policy is policy H5 B. of the Draft London Plan states: "Affordable housing should be provided on site. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances." This updates the on-site requirement set out in policy 3.12 C of the adopted London Plan.



Gross Development Value (GDV)

The GDV for the scheme undervalues the residential scheme and the value of the new school.

The GDV for the residential element of the scheme should be based on £910 per sq ft given:

“In my view, GE have underestimated the quality of the location of the subject properties. The buildings are all located within very close proximity of Ealing Broadway station which is a major transport hub and which will soon benefit from Crossrail (Elizabeth Line) communications. This will expedite travel times in particular to the City and Canary Wharf, rendering Ealing an even more attractive residential district for those working not only in the West End but also in the financial districts to the East of London. It is reasonable to expect that the desirability of residential properties in close proximity to Ealing Broadway will improve leading to higher values in the area.

I enclose at Appendix 1, my own calculation of expected resale values in respect of the properties as at today's date set this out alongside a reproduction of the GE figures.

I consider that the residential properties have a GDV of £15,615,000 which equates to an overall value of approximately £910 per sq ft overall.”

For the school, Gerald Eve assume the school would have a value of £23 million. Applying just £600 sq ft means the school would have a value of in excess of £28 million.

Profit

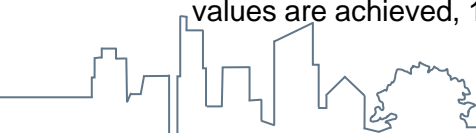
The level of profit from a scheme that is required depends on the risk associated with the development. The fact that the scheme generates profit for a new school and there is little risk to the delivery should be taken into account. The advice from Davis Coffey Lyons is:

“It could be argued that in the context of this particular project, the profit to Durston House will be in the form of a new purpose-built school facility and that they should not necessarily expect to be looking to reflect any developers profit on the residential component of the scheme. In these circumstances, the profit shown in their calculation could be added to the surplus available for affordable housing.”

Conclusion

As a result of the above factors, this scheme can generate more affordable housing. It is estimated the surplus is in excess of £4 million rather than the £1 million being offered. This level could be provided on-site.

The Council accepts that more could be provided but has simply asked for a review mechanism. No details of the review mechanism are provided. If for instance increased values are achieved, 100% of the uplift should go to the Council to deliver affordable housing.



Adverse impacts on air quality, air quality neutrality and climate change

A detailed note on Air Quality was submitted from Air Pollution Services in June 2019 and was included in a previous objection to the scheme. This provided an assessment of the Air Quality Assessment Report (AQAR) that was produced by Air Quality Consultants Ltd (AQC, 2018) in support of the planning application. The results of this has not been reviewed. No detail has been provided of how the Council's Energy and Sustainability Consultant has raised no objection.

Further to the conclusions set out within the Committee Report, a further note regarding the impact on air quality, air quality neutrality and climate change has been provided. This is attached to this objection. The key points raised are:

- “• Sufficient evidence has not been provided to demonstrate that adverse air quality impacts will not occur;
- The development does not comply with Policy 7.14B(c) of the London Plan, being 28% over the benchmark;
- Mitigation measures relating to air quality are based upon incomplete assessments and understated results and are therefore not adequate. No evidence has been provided to demonstrate that measures would actually result in air quality improvements;
- Sufficient evidence has not been provided to demonstrate the full extent of the effect of the development on climate change. Taking account of traffic emissions alone, the development will lead to an adverse impact on climate change and is therefore not compliant with the NPPF or Ealing's Climate Change Strategy;
- Proposed carbon offsetting has not been based on the full extent of the development's carbon footprint, nor over the lifetime of the development, and is therefore not adequate;
- The Target Fabric Energy Efficiency calculations provided, demonstrate that the energy strategy will result in a 191% exceedence of the Greater London Authority benchmark, and the application therefore does not comply with the Mayor's London Plan in relation to sustainable development, and is considered to not comply with Part L of Building Regulations by the time the development would be built..”

Overall, it is clear that the proposal would result in significant harm in terms of air quality and climate change and on these grounds the application should be refused.

Adverse impact on highway and pedestrian safety

The assessment in the Committee report fails to take account of the following issues:

1. As outlined by TfL and Greater London Authority (GLA), the proposed development should be car-free (excluding the provision for blue-badge holders).



Policy T6 Part A states that “car-free development should be the starting point for all development proposals that are well-connected by public transport”. The provision of on-site parking undermines the aims of this policy and encourages travel by unsustainable modes. Requiring parking for staff retention does not mean the policies should be ignored.

2. The Proposed development will significantly increase the volume of pedestrian and vehicular traffic along Carlton Road subsequently impacting on levels of air pollution. An increase in traffic along an already congested road combined with a high volume of pedestrian movements raises safety concerns, especially given the age demographic of pupils. The proposals to relocate the school would result in large volumes of children walking/cycling/scootering past the driveways to the residential properties. As outlined before, visibility from the residential driveways is already limited by on-street parking, the curvature of the road and obstructive vegetation. As a result, vehicles are unable to see pedestrians coming until they are edged out onto the pavement. Anecdotal evidence indicates that the limited extent of visibility achievable from the residents driveways has already led to several near-misses with young children which raises a serious safety concern. Adding increased pedestrian, scooter and cycle traffic to an already unsafe scenario puts the safety of all road-users at risk and must be considered during the determination process.

3. It is understood that all deliveries/servicing will take place outside of school-hours(07:00-22:00). Assuming that deliveries including catering etc. would need to take place before the school day begins, this will likely mean deliveries taking place early in the morning therefore causing disruption to local residents during anti-social hours.

4. The coach bay is located adjacent to the vehicular entrance to the garage of 19 Carlton Road and the pedestrian entrance to the pre-prep element of the development. Coaches parked in this location will reduce the extent of visibility achievable both for pedestrians crossing the road and vehicles emerging from the garage. The details of the proposed coach bay therefore must be examined and fully considered prior to a decision being made and, on this occasion, it is not considered appropriate to secure the details of the design via condition given the safety implications.

5. Where contributions towards highways improvements have been requested, the applicant has argued that “10% of pupils walk to the school, so there could be an additional 11 pupils walking on the local footways and crossing local roads. A sum of £360k seems entirely disproportionate to the increase in footfall in the area.” Currently, the school has 360 students and the proposed development has a capacity for 540 students, equating to an increase of 180 pupils. Based on the modal split outlined within the TA which indicates that 10% of pupils currently walk to / from school, it has been calculated that the proposed development would lead to an additional 18 pupils walking on the local footways. Moreover, the applicant’s statement is in direct

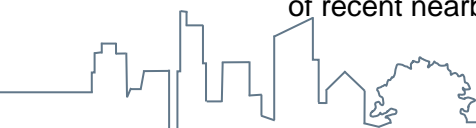


contradiction to their assertion that reducing car trips to/from the site will be the primary objective of the new Travel Plan and that the inclusion of infrastructure such as shower facilities will be successful in improving the multi-modal split once the new school is operational. If the Travel Plan is to be successfully implemented, then the number of additional pupils using the local footways and crossing facilities would be expected to be much greater than an increase of 11. It is not satisfactory to suggest that the impact of the development on congestion and parking availability will be limited due to the modal shift that may be achieved through the implementation of a Travel Plan, but equally state that limited pedestrian improvements are required because only a small percentage of pupils currently walk to school. The delivery of pedestrian infrastructure improvements are therefore considered to be crucial, particularly given the applicant has agreed in paragraph 18 of 'Durstons House School: Transport Comments / Queries' that there will be increased pressure on parking and an increase in vehicle movements in the area to the detriment of the road network if the current modal split remains unaltered.

6. In the current situation, vehicles travelling along Castlebar Road(B455) to the Pre-Prep and Main school sites are not required to turn right across oncoming flows of vehicle traffic. This helps to maintain a steady flow of traffic along a well-used route. The consolidation of the three sites onto Carlton Road would mean that all cars which currently travel southbound along Castlebar Road would be required to turn right onto Carlton Road. It is noted that whilst a right-turn lane is provided at the Carlton Road/Castlebar Road junction, its narrow width means that vehicles waiting to turn right still occupy part of the main southbound lane of traffic and, therefore, disrupt the flow of traffic along Castlebar Road. During the AM and PM peaks the high volumes of traffic carrying out this manoeuvre is likely to cause significant disruptions to the operation of the local road network, to which any consideration is absent in the submitted Transport Assessment.

7. In previous objection letters from Paul Basham Associates it was highlighted the TA's lack of consideration as to where parents can park whilst dropping off/picking up their children from school. In relation to this concern it has also been brought to my attention that parent and teacher meetings happen throughout the term in the evenings from 6pm onwards and that parts of the site will also be open to the public for amenity use. The parking survey undertaken as part of the TA identifies that following the implementation of the coach bay on Carlton Road, a minimum spare capacity of 5 'Permit Holders or Pay by Phone' spaces would be provided along Carlton Road. This level of spare capacity is insufficient to absorb the demand that will arise from the school, particularly in the evenings when residents demand for spaces is the highest. No consideration has been given to how this additional demand would be accommodated.

8. There are known to be existing problems with car parking and congestion on several roads in close proximity to the site which have been exacerbated by a series of recent nearby residential developments. For example, there is an existing shortage



of privately owned parking spaces for residents on Pinewood Road and understandable concerns have been expressed that such a significant shortfall of spaces to wait on the public highway network would result in parents waiting/turning in private areas to the detriment of resident amenity.

9. Concerns have also been raised that Carlton Road is used by emergency services on a regular basis and is a particularly common route for fire engines travelling from Ealing Fire Station. The additional traffic along Carlton Road resulting from the development would have an adverse effect on response times and therefore cause detriment to a fundamental public service

10 The scheme reserves the location of cycle and scooter parking to a condition. There is not sufficient space on site to provide this level of provision. It should be demonstrated that this level of provision could actually be provided.

11 The scheme fails to address the highway impact of the extra coaches and minibuses that currently housed on their site at 26 Castlebar Road on both Carlton Road and on the residents in Hounslow. Coaches will be required to take children to the school but also to Swynycombe Avenue playing fields.

Overall, the above concerns highlight that the proposed development would result in significant harm to highway and pedestrian safety.

Loss of Trees and Landscaping

The Arboricultural Impact Assessment (AIA) submitted with the application indicates that there would be significant tree loss as a result of this application. The following trees that the Council have identified as being particularly important for protection through a Tree Preservation Order are to be lost:

- 694 T4
- 694 T15

The AIA identifies the removal of 45 trees which form an important function on this open space.

No details of the CVAT value of trees have been provided. No assessment of the harm from the loss has been provided. Providing a contribution of £979 is not sufficient as this would only purchase one small tree. The proposal would be therefore be contrary to policies 5.10 and 7.21 of the London Plan



Conclusion

Overall, the proposal is clearly contrary to the Development Plan and should be refused for the reasons detailed in the previous letters of 24th April 2019, 15th July 2019 and 17th December 2019. It is disappointing that the scheme is being programmed to Committee even though the scheme fails to address the Council's pre-application advice and both the GLA and Sport England object. The scheme should simply be refused.

If any further information or clarification is required, please do not hesitate to contact me.

Yours sincerely

[Redacted Signature]

[Redacted Name]

Principal Consultant

[Redacted Email] walsingplan.co.uk



[REDACTED]

From: [REDACTED]
Sent: 22 January 2020 11:29
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Thanks!

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 22 January 2020 11:28
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Hi [REDACTED]

I am happy to raise with you when we formally receive the Stage 2 referral. There are some extant issues to resolve in advance of the referral so do not anticipate this imminently but will keep you looped in.

Sincerely

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk
[REDACTED]@london.gov.uk

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 22 January 2020 11:14
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Heya!

Just wanted to check – will Onkar be notified when this has been officially referred to the GLA? Thanks!

From: [REDACTED]
Sent: 08 January 2020 13:55
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Yep, I'm sat just by office 7.4W, but then if we use Onkar's office to meet – it's 7.2W.

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 January 2020 13:54
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

I will see if John is free now and if so head up. Could you remind me of the location?

Best

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management
GREATER LONDON AUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk
[REDACTED]@london.gov.uk

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 January 2020 13:52
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Onkar isn't in but if you are able to come up and have a chat with me about it that'd be helpful! Either now, or after 3:30? (I'm in a meeting 2:30 – 3:30)

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 January 2020 13:51
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Hi [REDACTED]

Is there a time which would be suitable today? John and I would be happy to come up if you have availability?

Best

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management

GREATER LONDON AUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 January 2020 13:47
To: [REDACTED] <[REDACTED]@london.gov.uk>; John Finlayson <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Sorry to be a pain, but we are in Ealing tomorrow – would it be possible to a phone call instead? Would 2:30 work?

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 January 2020 13:44
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; John Finlayson <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Hi [REDACTED]

John Finlayson (Head of Development Management) and [REDACTED] (Strategic Planner) would be happy to meet Onkar tomorrow. Please can you liaise with them directly re their diaries.

They will update Jules after the meeting.

Cheers

[REDACTED]

Senior PA to Jules Pipe CBE, Deputy Mayor Planning, Regeneration & Skills, Mayor's Office
MAYOR OF LONDON
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 January 2020 11:29
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Hi,

This issue is going to Ealing Council imminently (and we are fairly sure the planning committee will pass it through stage 1). Is there a time either today or tomorrow that would be good for a quick catch up with Jules or, more likely, one of the planning team to discuss what happens next from a GLA perspective (and if so who would be best to talk to?)

Thank you!

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 25 April 2019 10:09
To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School



[REDACTED] [REDACTED]

Senior PA to Jules Pipe CBE, Deputy Mayor Planning, Regeneration & Skills, Mayor's Office
MAYOR OF LONDON

City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk
[REDACTED]@london.gov.uk

From: [REDACTED] [REDACTED]
Sent: 25 April 2019 10:08
To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Of course – will do!

And thank you.

From: [REDACTED] [REDACTED]
Sent: 25 April 2019 09:57
To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Hi [REDACTED]

Going forward can you come to me first re the diary please?

I will speak with Jules and revert.

Thanks

[REDACTED] [REDACTED]

Senior PA to Jules Pipe CBE, Deputy Mayor Planning, Regeneration & Skills, Mayor's Office
MAYOR OF LONDON

City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk

[REDACTED] london.gov.uk

From: [REDACTED]
Sent: 24 April 2019 18:35
To: Jules Pipe <[REDACTED]@london.gov.uk>
Subject: Request from Onkar Sahota for a meeting re: Durston House School

Hi,

Would I be able to organise a meeting between you and Onkar to discuss this planning application, which will be coming through the GLA?

Thank you,

[REDACTED]
Research and Support Officer to Onkar Sahota AM

London Assembly Labour

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

Tel: 020 7983 [REDACTED]

london.gov.uk

[REDACTED] london.gov.uk

my pronouns are: [REDACTED]

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 22 January 2020 11:28

To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Hi [REDACTED]

I am happy to raise with you when we formally receive the Stage 2 referral. There are some extant issues to resolve in advance of the referral so do not anticipate this imminently but will keep you looped in.

Sincerely

[REDACTED]

[REDACTED] [REDACTED]

Senior Strategic Planner, Development Management

GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 22 January 2020 11:14
To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Heya!

Just wanted to check – will Onkar be notified when this has been officially referred to the GLA? Thanks!

From: [REDACTED] [REDACTED]
Sent: 08 January 2020 13:55
To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Yep, I'm sat just by office 7.4W, but then if we use Onkar's office to meet – it's 7.2W.

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 January 2020 13:54
To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

I will see if John is free now and if so head up. Could you remind me of the location?

Best

[REDACTED]

[REDACTED] [REDACTED]

Senior Strategic Planner, Development Management

GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 January 2020 13:52
To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Onkar isn't in but if you are able to come up and have a chat with me about it that'd be helpful! Either now, or after 3:30? (I'm in a meeting 2:30 – 3:30)

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 January 2020 13:51
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Hi [REDACTED]

Is there a time which would be suitable today? John and I would be happy to come up if you have availability?

Best

[REDACTED]

[REDACTED] [REDACTED]

Senior Strategic Planner, Development Management
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk
[REDACTED]@london.gov.uk

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 January 2020 13:47
To: [REDACTED] <[REDACTED]@london.gov.uk>; John Finlayson <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Sorry to be a pain, but we are in Ealing tomorrow – would it be possible to a phone call instead? Would 2:30 work?

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 January 2020 13:44
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; John Finlayson <[REDACTED]@london.gov.uk>
Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Hi [REDACTED]

John Finlayson (Head of Development Management) and [REDACTED] (Strategic Planner) would be happy to meet Onkar tomorrow. Please can you liaise with them directly re their diaries.

They will update Jules after the meeting.

Cheers

[REDACTED] [REDACTED]

Senior PA to Jules Pipe CBE, Deputy Mayor Planning, Regeneration & Skills, Mayor's Office
MAYOR OF LONDON
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk

[REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 08 January 2020 11:29

To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Hi,

This issue is going to Ealing Council imminently (and we are fairly sure the planning committee will pass it through stage 1). Is there a time either today or tomorrow that would be good for a quick catch up with Jules or, more likely, one of the planning team to discuss what happens next from a GLA perspective (and if so who would be best to talk to?)

Thank you!

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 25 April 2019 10:09

To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School



[REDACTED] [REDACTED]

**Senior PA to Jules Pipe CBE, Deputy Mayor Planning, Regeneration & Skills, Mayor's Office
MAYOR OF LONDON**

City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk

[REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

From: [REDACTED] [REDACTED]

Sent: 25 April 2019 10:08

To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Of course – will do!

And thank you.

From: [REDACTED] [REDACTED]

Sent: 25 April 2019 09:57

To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: Request from Onkar Sahota for a meeting re: Durston House School

Hi [REDACTED]

Going forward can you come to me first re the diary please?

I will speak with Jules and revert.

Thanks

[REDACTED] [REDACTED]

**Senior PA to Jules Pipe CBE, Deputy Mayor Planning, Regeneration & Skills, Mayor's Office
MAYOR OF LONDON**

City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](https://www.london.gov.uk)

From: [REDACTED]
Sent: 24 April 2019 18:35
To: Jules Pipe <[REDACTED]@london.gov.uk>
Subject: Request from Onkar Sahota for a meeting re: Durston House School

Hi,

Would I be able to organise a meeting between you and Onkar to discuss this planning application, which will be coming through the GLA?

Thank you,

[REDACTED] [REDACTED] [REDACTED]

Research and Support Officer to Onkar Sahota AM

London Assembly Labour

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

Tel: 020 7983 [REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](https://www.london.gov.uk)

my pronouns are: [REDACTED]

At the planning meeting in Ealing last week, the applicant said that only 16% of the soft landscaping will be reduced, see attached pictures & decide if this is correct. Ealing is a Borough of approx. 350,000 & an area of 55.53km² - so as you can see is a huge part of London

As many of you will know there are various rules & regulations about removing green open space on Metropolitan Urban land, whether privately owned or not.

There are now stricter rules & guidelines about Bio Diversity on planning applications, than when the previous application was submitted just to build a pavilion in 2004. When the case officer was asked about this he said "planning applications are subject to different rules now". He was correct - Stricter ones on Bio Diversity & loss of Urban Green Space.

There was support from all party's in trying to improve Bio Diversity & this quote came from opposition in the Commons the same night the Durston Planning application was being debated. Though this bill has not passed yet we should be adopting best practice now.

"I wanted to congratulate the Secretary of State on one thing that caught my eye in both the Queen's Speech and last year's Environment Bill: the biodiversity net gain mandated for planning authorities when making their decisions. That has not yet taken effect. Ealing Council has a meeting of its planning committee tonight. Will she encourage me by making a new year's resolution of ensuring that such committees adopt the measure now so that the bulldozers do not sacrifice our nature? The future of our planet is at stake."

Please help the local residents & more importantly, Ealing & London. We have to review this application, the campaign goes on.

Regards,


SAVE EALING GREEN SPACES


UK Parliament Disclaimer: this e-mail is confidential to the intended recipient. If you have received it in error, please notify the sender and delete it from your system. Any unauthorised use, disclosure, or copying is not permitted. This e-mail has been checked for viruses, but no liability is accepted for any damage caused by any virus transmitted by this e-mail. This e-mail address is not secure, is not encrypted and should not be used for sensitive data.

This message has been scanned for viruses by the Greater London Authority.

Click [here](#) to report this email as spam.

[REDACTED]

From:
Sent: 05 February 2020 14:05
To:
Subject: RE: From Mayor's office SP&C

OK so I got this reply "The GLA are in discussion with the applicant team on the viability and affordable housing contribution. Simply, details of those discussions."

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 05 February 2020 13:59
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: From Mayor's office SP&C

Hi [REDACTED]

Apologies, working through the chain below, do we have confirmation that the Environmental Impact report is what is being sought?

If this is the case all application documents can be publicly viewed at the link below using the following reference: 191182FUL.

<https://pam.ealing.gov.uk/online-applications/>

Sincerely

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk
[REDACTED] london.gov.uk

From: [REDACTED]
Sent: 05 February 2020 12:41
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: FW: From Mayor's office SP&C

Are we able to request this document?

From: [REDACTED]
Sent: 04 February 2020 21:07
To: Onkar Sahota <Onkar.Sahota@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: From Mayor's office SP&C

Onkar,
Thanks for your prompt response.
I believe it is but I will check and revert.
KR
[REDACTED]

From: Onkar Sahota <Onkar.Sahota@london.gov.uk>
Sent: 04 February 2020 21:01
To: [REDACTED]
Cc: [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>
Subject: Re: From Mayor's office SP&C

[REDACTED]

[REDACTED] deals with external relations and community engagement. He was responding to a MP about process rather than planning team considerations.

I presume you mean Environment Impact Report by EIR ?

I can certainly request it as I am sure it will be a public document which will justify the decision either way of the Planning Team.

Kind regards,

Onkar

Get [Outlook for iOS](#)

From: [REDACTED]
Sent: Tuesday, February 4, 2020 8:41:00 PM
To: Onkar Sahota <Onkar.Sahota@london.gov.uk>
Cc: [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>; [REDACTED]
[REDACTED]
Subject: FW: From Mayor's office SP&C

Dear Onkar,

Please see below a response from the Mayor's Office to Rupa with our planning consultant's further comments.

I'd be grateful for your thoughts on [REDACTED] comments?

Also, could please arrange for an EIR request to the GLA on our behalf?

Thank you in advance and with best wishes.

[REDACTED]

From: [REDACTED] <[\[REDACTED\]@walsingplan.co.uk](mailto:[REDACTED]@walsingplan.co.uk)>
Date: 4 February 2020 at 11:45:41 GMT

To: [REDACTED]
Cc: [REDACTED]
Subject: RE: From Mayor's office SP&C

[REDACTED]

I thought the response was essentially a brush off.

The response also interprets that the principle was OK when the actual response stated "does not comply with the London Plan" and on principle of development needed loss and harm to be clearly outweighed by public benefits. It also was based on the 16% loss which is actually 35%.

Any further representations submitted must be taken into account.

It would be good to find out what the further information on viability was being sought. This corresponds with the call I received from the GLA case officer who said not all GLA issues had been resolved. An EIR request to the GLA should be done.

[REDACTED]

From: [REDACTED]
Sent: 04 February 2020 09:59
To: [REDACTED] <[\[REDACTED\]@walsingplan.co.uk](mailto:[REDACTED]@walsingplan.co.uk)>
Cc: [REDACTED]
Subject: Fwd: From Mayor's office SP&C

[REDACTED]

See below don't seem to be engaging with the objections

Looks like a box ticking exercise

Any thoughts how to get their attention ?

[REDACTED]

Sent from my iPhone

Begin forwarded message:

From: [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>
Sent: 03 February 2020 16:59
To: HUQ, Rupa <rupa.huq.mp@parliament.uk>
Subject:

Dear Rupa,

Following from our discussion, an official response to your letter will be sent to you in due course - I will expedite this and make sure you get a response sooner rather than later.

As a summary of where we are right now.

- . City Hall considered the application at Stage 1 in May 2019 and concluded that the principle of development was acceptable and sought further detail on affordable housing, sustainable development, transport and design matters. The report summarising our position is attached. This should be on our website, but isn't currently due to a technical glitch.
- . Ealing's Planning Committee resolved to approve planning permission on 15th Jan 2020.
- . They will need to refer the application back to the Mayor under the Stage 2 process.
- . We are currently awaiting a response from the applicant team on the viability and affordable housing contribution which we will need to resolve in advance of accepting the stage 2 referral.
- . No date is currently set for the stage 2 consideration.

Planning officers have been taking into account representations from objectors and supporters in relation to the application. This includes speaking directly with [REDACTED]

If you have any questions, please do let me know.

[REDACTED]


[REDACTED]

Senior Advisor to the Mayor

MAYOR OF LONDON

City Hall, The Queen's Walk, London SE1 2AA

[REDACTED]



From: [REDACTED]
Sent: 24 February 2020 14:03
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Gurnell development – please help us save green spaces
Heya!

Sorry to chase you on your first day back in the office, but just wanted to make sure you saw this.
Thank you!

From: [REDACTED]
Sent: 17 February 2020 15:54
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: FW: Gurnell development – please help us save green spaces
Hi,
Hope you are good!

Sorry to throw another thing at you, but I wanted to check if there had been any discussion with the GLA about the below?

Thank you!

From: Save Gurnell [REDACTED]
Sent: Thursday, February 13, 2020 9:29:50 AM
To: Onkar Sahota <Onkar.Sahota@london.gov.uk>
Subject: Fwd: Gurnell development – please help us save green spaces
Dr. Sahota,

Thank you again for your time yesterday. To confirm some of the key points:

This proposal has been ongoing for at least 5 years - this project is meant to be a leisure centre replacement not a housing project

Costs

- The original estimated cost for the new leisure centre was £30m and the enabling development was meant to meet this in full, meaning that the council would not have to contribute anything to the scheme
- Over the past 5 years, the estimated cost of the new leisure centre has increased to £37.7m as due to the plans for build on top of the current car park, parking for both leisure and residential had to be moved underground
- Additionally, the developer contribution has decreased over the last 5 years as we have been unable to find out exactly how much is now being contributed and therefore how much the council need to fund
- £37.7m is an extortionate amount of money for a leisure centre of the facility mix proposed – the same developer has built for significantly less

Facilities

- The original intention was to deliver an improved facility mix, however the current proposal is basically the same as the current offering so although the centre will be new it won't really have any additional facilities

GLA discussions

- The entire site in question is Metropolitan Open Land (MOL) and this development would be classified as "inappropriate development"

- We believe the GLA are yet to see the Financial Viability Assessment to back up the need for such a large development
- London Plan Policy H6 identifies that sites such as this which are in public ownership should by 50% affordable housing, this scheme will only provide 35%

Risks

- The developer has now withdrawn from delivering the entire scheme as they have said it's not viable for them given the requirement to build affordable housing
- This means that Ealing Council now have direct delivery responsibility for the new leisure centre and attached housing – they also carry all the risk whereby in the original proposal the developer carried all the risk and the cost

So to summarise, over the last 5 years the scope and specification of the new leisure centre has decreased, the developer contribution and risk has decreased whilst the cost and risk to the council has increased significantly. There is a significant risk that the leisure centre will be demolished and will take more than the planned 3 years to rebuild, or worse still not rebuilt at all

As discussed, we are asking all of the Ealing and Hillingdon GLA candidates for there position on this scheme so we can let our supporters know where everyone stands. We are just one campaign group within a network of over 60 groups and residents associations that are connected across the borough.

If you need any further details please let us know, we are available for any meetings to go through this with the relevant people. Looking forward to your response.

Kind regards,

Louise

----- Forwarded message -----

From: **Save Gurnell** [REDACTED]

Date: Wed, Jan 22, 2020 at 2:34 PM

Subject: Gurnell development – please help us save green spaces

To: <onkar.sahota@london.gov.uk>

Dr Sahota,

We are writing to you to bring to your attention the views of Ealing residents with regards to this development. This development is within Ealing and Hillingdon, impact residents of the entire borough of Ealing and could set a dangerous precedent for building on Metropolitan Open Land (MOL).

To summarise we are challenging this enormous development and land which carries the same designation as Green belt – we would greatly appreciate your support. Ealing Council seem to have a complete disregard for protection of green spaces as evidenced with Warren Farm, Durston House and now Gurnell.

The details

Ealing Council plan to redevelop the current Gurnell Leisure Centre and build a large residential development on the current site.

The leisure centre will be closed for at least two and a half years while the development takes place.

The council do not have enough funds to pay for the new centre and will be allowing a private developer to build on the site in return for a yet undisclosed fee. The September 2019 consultation presentation had no financial details; however, we understand that the development is no longer cost neutral to the council.

The entire residential part of the development will consist of 612 flats across 6 tower blocks ranging between 6, 10, 13, 15, 15 and 17 storeys - this could equate to around 1,700 people living in the development.

The local residents support the need for the leisure centre to be either refurbished or redeveloped and recognise that there is a cost associated with this. They are also supportive of the provision of Affordable Housing, and sustainable progressive developments. However, several concerns have been raised about this development, including but not limited to:

- Inappropriate development on Metropolitan Open Land (MOL) which is afforded the same protection as Green Belt
- The lack of consideration by the Local Planning Authority regarding the impact as a whole of this and other developments across the borough
- The amount of Affordable Housing being well below strategic targets
- The impact to local infrastructure from the increased population (NHS, schools, public transport, parking and insufficient cycle spaces in local transport hubs)
- The lack of meaningful consultation with the local community with regards to both the specification of the leisure centre and the residential aspects of the development

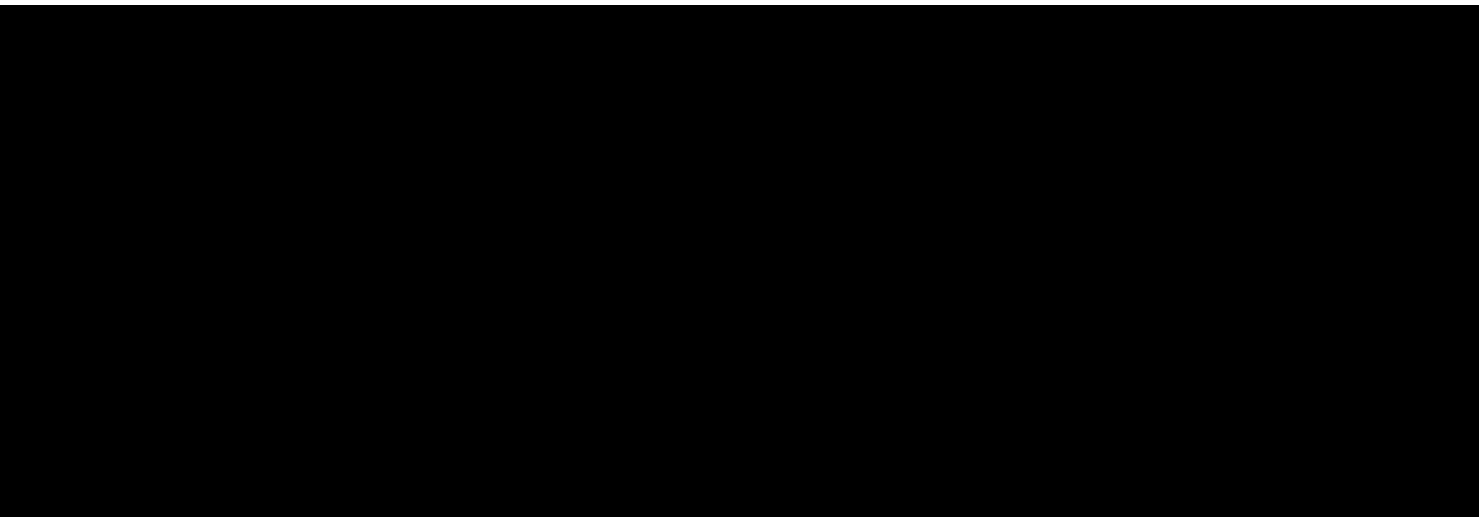
- The adverse effect on the residential amenity of the neighbours and community due to overlooking, loss of privacy, overshadowing, etc.
- The proposed development is overbearing, out of scale and out of character in terms of its appearance compared with existing development in the vicinity

We'd like to discuss the matter with you further and look forward to your response.

Kind regards,

[REDACTED]

On behalf of "Save Gurnell"



From: [redacted] <[redacted]>
Sent: 26 February 2020 09:36
To: Onkar Sahota <Onkar.Sahota@london.gov.uk>
Cc: [redacted] <[redacted]@london.gov.uk>
Subject: FW: Durston Playing Fields
Importance: High

Dear Onkar,

Please can you forward the attached two photos to the GLA team who are considering Durston's stage II referral so that they can fully appreciate what will be lost for good!? They were taken yesterday.

Thank you and best wishes

[redacted]
[redacted]

[REDACTED]

From: [REDACTED]
Sent: 09 March 2020 12:17
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: FW: Durston Planning Application - GLA/4597
Importance: High

Heya!

Please see below. They are requesting a meeting...is this a thing that is doable?

From: [REDACTED]
Sent: 09 March 2020 11:42
To: Onkar Sahota <Onkar.Sahota@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>;
Rupa.Huq.mp@parliament.uk
Cc: [REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]>

[REDACTED]

Subject: Re: Durston Planning Application - GLA/4597

Importance: High

Dear Onkar / [REDACTED] / Rupa,

I am just following up on a brief chat I had with Onkar last week & wanted to find out where this application is at right now, who is reviewing it & what the next process is.

Can we ask if it is possible to arrange a meeting with [REDACTED] [REDACTED] or John Finlayson regarding the GLA stage 2 consideration. Durston School met with [REDACTED] [REDACTED] on pre application around January 2019 or before and we would like the opportunity to outline some facts that appear to be in dispute.

- 1 London Plan Affordable Housing not being met
- 2 Bio Diversity loss not gain
- 3 Social infrastructure being supplied by creating 108 extra Private Prep school places.
- 4 Loss of Green Space & Climate Change

Below is the Mayor's policy regarding affordable housing which sets out clearly the objectives on Affordable Housing. Durston are obliged to follow this as they are converting 17 properties and although these are on 3 sites they are still obliged to follow planning rules and does not get divided by 3 as some may appear to be the case. The Mayors plan sets out that the target is for 50% affordable housing and that this should be met on site. This is not being followed and so goes against the current Draft London Plan.

<https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/chapter-4-housing/policy>

[GLA STAGE 1 Comments / Concerns :](#)

Principle of development: The proposal would result in a loss of open space and playing field. Any such loss must be clearly outweighed by public benefits. (No Public benefits, as school has over 40 empty places and primary places requirement set to fall). Also any new residents in Ealing will be served by 50% of Affordable Housing and by logic will not be looking for expensive Private prep school places. The proposal would result in a loss of open space and playing field. Any such loss must be clearly outweighed by public benefits, including a robust community use package to be secured by Section 106 agreement. (There are 15 reasons why this does not compensate, has not been set out and there has not been any consultation with the community or residents. So far those expressing an interest are clubs that the Governor of the school is involved in but this has never been highlighted. We would like the opportunity to assert that Sports England's position should not be ignored). Sports England have objected to the proposal as it fails national and local policy requirements.

Affordable housing: In the absence of an agreed viability position the absence of an affordable housing contribution is unacceptable (paragraphs 19-26). (No mention of a section 106 payment being acceptable.)

Sustainable development: The applicant is required to submit further information regarding; carbon savings, renewable energy, flood risk and drainage to confirm London Plan compliance (Paragraphs 35-36). There is a bio-diversity net loss of 3% (see attached) stated by the applicant but this excludes 2,370M2 of Astro Turf at the centre of the site. If this is included, as it should be, it would show to be a far higher figure as a loss of bio-diversity. Even though all figures show a bio-diversity net loss Ealing Planning department have stated there is a net gain – this is incorrect and needs substantial further investigation. The loss of over 40 mature trees is not compensated by less than £1,000 in section 106 payments (£22 a tree) and 50 new saplings.

Transport: The applicant must address transport issues with respect to; vehicle parking design and quantum, blue badge parking, cycle parking design and quantum and school travel plan. (Access to the site will be condensed onto Carlton Road, a notorious rush hour cut through road. Also with junctions at either end which represents the highest cycle accidents in the area over the last 5 years via the local Ealing borough cycle survey. This has been dismissed as "acceptable" by Durston House schools lobbyists. (see attached) There is no dedicated cycle lanes in the road or local roads and the Travel Plan is designed to encourage pupils aged 4-13 to cycle to school, thereby putting young children at the centre of an accident "hot spot". Access to the site for service vehicles, refuse, delivery, recycling vehicles is at the same point as pupil access. It also conflicts with the one disabled bay. It is also planned to provide a dedicated coach bay to the school, narrowing the road further. There is no provision for parking on site for the 5/6 mini buses, service vehicles, currently parked behind their buildings and these will have to be parked on Carlton Road. The consequence will be a narrowing of the road further creating more highways problems that have not been observed or addressed. Highways have highlighted problems with an increase of staffing levels & as a result a limit of current staffing numbers (90) has been set as a condition. As there will be a new canteen on site serving 630 lunching daily staff will be required to receive goods, prepare, cook, serve and recycle & create daily waste. Staffing numbers required for this will be part time and estimated in excess of 30. This condition is easily passed by sub contracting or by other means. The result will be more staff arriving and working at the site, just not Durston employees. Our Ward councillors, who know the area well, warned of these problems but they were dismissed by planning officers who do not have in depth local knowledge & some do making decisions not even live in the borough.

One of the reasons for giving approval to Durston & overriding policy is that it provides Social infrastructure of badly needed school places and Educational need. However that is only correct for state secondary school places & this is being met by the new Ada Lovelace & Ealing Fields Schools locally, which are opening in September 2020. Durston is a private school so not social but also the need for school places applies to secondary & not primary where there is expected to be a fall in demand due to reduced birth rates in Ealing. As you can see there was a 12% over supply in Ealing as of January this year, not a shortfall. See below email to Rupa this January:

From [REDACTED] <[REDACTED]@ealing.gov.uk>

Sent: Friday, January 17, 2020 5:49 pm

To: HUQ, Rupa

Subject: RE: Primary School, Places

Hi Rupa,

My apologies for the delayed response – [REDACTED]

All applicant's for reception 2019 were offered with around a 12% surplus on national offer day. We have not had any issues with sufficiency for late applications or in-year admissions. There are currently around 225 available places across the borough, 20 of which are in W5 schools.

Kind Regards

[REDACTED]
Head of Admissions & Fair Access
Ealing Council
[REDACTED]

As mentioned I was at a meeting last week and listening to Jules Pipe speaking to London developers. We know there are many challenges and we were encouraged that this application will be rejected as Harrow School & Haslemere School applications have been after being approved by local councils. This was

- 1 Socially and economically inclusive
- 2 Adhere to Climate Change Policies
- 3 Create Healthy Cities & give access to Green spaces
- 4 Create Genuinely Affordable Houses

Save Ealing Green Spaces

 [@london.gov.uk](mailto: @london.gov.uk)
 london.gov.uk
 london.gov.uk

Who should the message be to, and who should be CCed please?

Many thanks for your help.



[REDACTED]

From: [REDACTED]
Sent: 13 March 2020 13:07
To: [REDACTED] <[REDACTED]@london.gov.uk>; Onkar Sahota <Onkar.Sahota@london.gov.uk>; Rupa.Huq.mp@parliament.uk
Cc: [REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]>

Subject: Re: Durston Planning Application - GLA/4597
Dear [REDACTED] / Onkar,

Hope you are all keeping well.

Thank you for trying to set this meeting up. We have been saying that the applicant (Durston House School) have mislead, misrepresented the facts & actually lied through their application process. It is important that we can back up our assertions & prove it and so that The GLA, Jules Pipe, [REDACTED] [REDACTED] and any other decision makers are not hoodwinked , so we are attaching the following.

Five statements from Durston Private Prep School Governor , [REDACTED] , at the planning meeting which are not misleading but lies, please check attached the audio recording for proof. He is the Governor who has an interest in three of the clubs who expressed an interest in community use and has proved to be an important reason for giving approval. There was a great deal of misrepresentation, exaggeration & misleading statements but below are just the lies.

1 One councilor asked (at site visit) about Wheel chair access, there is none & there is nothing we can do about this.
(See picture of wheelchair lift in one of the buildings)

2 A Planned analysis shows there will be a net gain in Bio Diversity, **(their own assessment shows a 3% loss – see attached.)**

3 82% of the site will remain open . **They are building on over 18% as can be seen attached by glancing at remaining green space.**

4 Yes we are removing trees but this is not to facilitate the development , only poor quality trees are being removed. **The following trees are being removed that are high quality & monetary value, these include theses 5 (T 170, T154, T53, T43, T1). Some is to facilitate a new entrance close to 19 Carlton Road. The value of trees being removed is in excess of £22,000 . The case officer sought independent advice on the trees & they recommended a far higher payment than the section 106 £900 + that will be received.**

5 To Avoid any doubt the GLA do not oppose the scheme. **As the application currently stands they do , this may be rectified by remedies but current position is it has to be referred back.**

Very importantly It is worth noting that neither the committee chairman, the case officer , or the planning department , corrected the applicant when they knew all these facts were false.

Best

[REDACTED]

On 09/03/2020 12:16, "[REDACTED]" <[REDACTED]@london.gov.uk> wrote:

Have raised this with [REDACTED] – will let you know when he responds.

From: [REDACTED]

Sent: 09 March 2020 11:42

To: Onkar Sahota <Onkar.Sahota@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; Rupa.Hug.mp@parliament.uk

Cc: [REDACTED]

Subject: Re: Durston Planning Application - GLA/4597

Importance: High

Dear Onkar / [REDACTED] / Rupa,

I am just following up on a brief chat I had with Onkar last week & wanted to find out where this application is at right now, who is reviewing it & what the next process is.

Can we ask if it is possible to arrange a meeting with [REDACTED] or John Finlayson regarding the GLA stage 2 consideration. Durston School met with [REDACTED] on pre application around January 2019 or before and we would like the opportunity to outline some facts that appear to be in dispute.

- 1 London Plan Affordable Housing not being met
- 2 Bio Diversity loss not gain
- 3 Social infrastructure being supplied by creating 108 extra Private Prep school places.
- 4 Loss of Green Space & Climate Change

Below is the Mayor's policy regarding affordable housing which sets out clearly the objectives on Affordable Housing. Durston are obliged to follow this as they are converting 17 properties and although these are on 3 sites they are still obliged to follow planning rules and does not get divided by 3 as some may appear to be the case. The Mayors plan sets out that the target is for 50% affordable housing and that this should be met on site. This is not being followed and so goes against the current Draft London Plan.

<https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/chapter-4-housing/policy>

GLA STAGE 1 Comments / Concerns :

Principle of development: The proposal would result in a loss of open space and playing field. Any such loss must be clearly outweighed by public benefits. (No Public benefits, as school has over 40 empty places and primary places requirement set to fall). Also any new residents in Ealing will be served by 50% of Affordable Housing and by logic will not be looking for expensive Private prep school places. The proposal would result in a loss of open space and playing field. Any such loss must be clearly outweighed by public benefits, including a robust community use package to be secured by Section 106 agreement. (There are 15 reasons why this does not compensate, has not been set out and there has not been any consultation with the community or residents. So far those expressing an interest are clubs that the Governor of the school is involved in but this has never been highlighted. We would like the opportunity to assert that Sports England's position should not be ignored). Sports England have objected to the proposal as it fails national and local policy requirements.

Affordable housing: In the absence of an agreed viability position the absence of an affordable housing contribution is unacceptable (paragraphs 19-26). (No mention of a section 106 payment being acceptable.)

Sustainable development: The applicant is required to submit further information regarding; carbon savings, renewable energy, flood risk and drainage to confirm London Plan compliance (Paragraphs 35-36). There is a bio-diversity net loss of 3% (see attached) stated by the applicant but this excludes 2,370M2 of Astro Turf at the centre of the site. If this is included , as it should be , it would show be a far higher figure as a loss of bio-diversity. Even though all figures show a bio-diversity net loss Ealing Planning department have stated there is a net gain – this is incorrect and needs substantial further investigation. The loss of over 40 mature trees is not compensated by less that £1,000 in section 106 payments (£22 a tree) and 50 new saplings.

Transport: The applicant must address transport issues with respect to; vehicle parking design and quantum, blue badge parking, cycle parking design and quantum and school travel plan. (Access to the site will be condensed onto Carlton Road, a notorious rush hour cut through road. Also with junctions at either end which represents the highest cycle accidents in the area over the last 5 years via the local Ealing borough cycle survey. This has been dismissed as “acceptable” by Durston House schools lobbyists. (see attached) There is no dedicated cycle lanes in the road or local roads and the Travel Plan is designed to encourage pupils aged 4-13 to cycle to school, thereby putting young children at the centre of an accident “hot spot”. Access to the site for service vehicles , refuse, delivery, recycling vehicles is at the same point as pupil access. It also conflicts with the one disabled bay. It is also planned to provide a dedicated coach bay to the school , narrowing the road further. There is no provision for parking on site for the 5/6 mini buses , service vehicles , currently parked behind their buildings and these will have to be parked on Carlton Road. The consequence will be a narrowing of the road further creating more highways problems that have not been observed or addressed. Highways have highlighted problems with an increase of staffing levels & as a result a limit of current staffing numbers (90) has been set as a condition. As there will be a new canteen on site serving 630 lunch daily staff will be required to receive goods, prepare, cook, serve and recycle & create daily waste. Staffing numbers required for this will be part time and estimated in excess of 30. This condition is easily by passed by sub contracting or by other means. The result will be more staff arriving and working at the site, just not Durston employees. Our Ward councillors, who know the area well, warned of these problems but they were dismissed by planning officers who do not have in depth local knowledge & some do making decisions not even live in the borough.

One of the reasons for giving approval to Durston & overriding policy is that it provides Social infrastructure of badly needed school places and Educational need. However that is only correct for state secondary school places & this is being met by the new Ada Lovelace & Ealing Fields Schools locally, which are opening in September 2020. Durston is a private school so not social but also the need for school places applies to secondary & not primary where there is expected to be a fall in demand due to reduced birth rates in Ealing. As you can see there was a 12% over supply in Ealing as of January this year, not a shortfall. See below email to Rupa this January:

From: [REDACTED] <[REDACTED]@ealing.gov.uk>

Sent: Friday, January 17, 2020 5:49 pm

To: HUQ, Rupa

Subject: RE: Primary School, Places

Hi Rupa,

My apologies for the delayed response – [REDACTED]

All applicant's for reception 2019 were offered with around a 12% surplus on national offer day. We have not had any issues with sufficiency for late applications or in-year admissions. There are currently around 225 available places across the borough, 20 of which are in W5 schools.

Kind Regards

[REDACTED]

Head of Admissions & Fair Access

Ealing Council

[REDACTED]

As mentioned I was at a meeting last week and listening to Jules Pipe speaking to London developers. We know there are many challenges and we were encouraged that this application will be rejected as Harrow School & Hasmaneian School applications have been after being approved by local councils. This was based on his following stated priorities that under pinned the new draft London Plan that should be followed now. These were that applications should be :

- 1 Socially and economically inclusive
- 2 Adhere to Climate Change Policies

 london.gov.uk

Who should the message be to, and who should be CCed please?

Many thanks for your help.



[REDACTED]

From: [REDACTED]
Sent: 31 March 2020 15:14
To: [REDACTED] <[REDACTED]@london.gov.uk>; Onkar Sahota <Onkar.Sahota@london.gov.uk>
Cc: [REDACTED]
Subject: RE: Deputy Mayor Jules Pipe response to Onkar Sahota AM re: Durston House School - MGLA160120-0491

Thank you!

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 31 March 2020 13:25
To: Onkar Sahota <Onkar.Sahota@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: Deputy Mayor Jules Pipe response to Onkar Sahota AM re: Durston House School - MGLA160120-0491

Dear Onkar

Apologies for the delay but please see attached response from Jules re the Durston House School application.

Kind regards

[REDACTED]

[REDACTED]

Senior PA to Jules Pipe CBE, Deputy Mayor Planning, Regeneration & Skills, Mayor's Office
MAYOR OF LONDON
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]
07917 790377 (work mobile)

london.gov.uk
[REDACTED] london.gov.uk

MAYOR OF LONDON

Dr Onkar Sahota AM MBA FRCGP

City Hall
The Queen's Walk
London SE1 2AA

Our ref: MGLA160120-0491

Date: 31 March 2020

Dear Onkar,

Thank you for your letter to the Mayor in relation to the planning application at Durston House School (GLA ref: GLA/4597) received on 16 January 2020 and for forwarding a sample of the representations you have received in relation to the application. The Mayor has asked me to respond on his behalf as a result of delegations that will be ongoing during the Covid-19 outbreak. Apologies for the lateness of this.

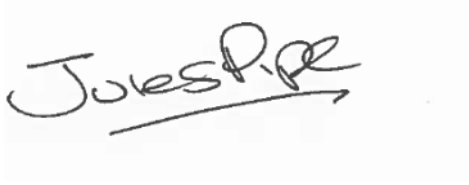
We have noted the content of the letters which made particular reference to issues regarding increased traffic, congestion and pollution, loss of outdoor playspace, environmental impacts, lack of affordable housing, the level of local opposition, compliance with the London Plan, air quality, loss of open community space and lack of public benefit. Your representation will be retained on file along with all other representations we receive, and the issues raised will be duly considered as part of the decision-making process.

By way of context and in relation to the objections you raised, the Mayor initially reviewed the scheme on 13 May 2019 and provided his 'Stage 1' comments to Ealing Council, a copy of which is attached for your ease of reference.

Following public consultation, Ealing Council considered the scheme at its planning committee of 15 January 2020 and resolved to grant planning permission. Ealing Council must now refer the application back to the GLA to enable the Mayor to decide whether the council's decision can stand or if he wishes to direct refusal.

In order not to prejudice any future decision on the case, it is important that I do not comment on the application in further detail at this time. However, as part of the Stage 2 process, all representations received will be taken into account, including the issues you and your constituents have raised, in addition to an updated assessment of the proposal by Greater London Authority planning officers. Please be assured that when the time comes to make the final decision, all representations received will be carefully considered as part of this process.

Yours sincerely,

A handwritten signature in black ink, reading 'Jules Pipe', with a horizontal line underneath the name.

Jules Pipe CBE

Deputy Mayor for Planning, Regeneration and Skills

GREATER **LONDON** AUTHORITY
Development, Enterprise and Environment

Principal Planner

Strategic Planning Team
Regeneration & Housing Directorate
London Borough of Ealing Council
Perceval House, 14-16 Uxbridge Road
London W5 2HL

Our ref: GLA/4597/01

Your ref: 191182FUL

Date: 13 May 2019

Dear [REDACTED]

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

I refer to the copy of the above planning application, which was received from you on the 18 March 2019. On 13 May 2019, the Mayor considered a report on this proposal, reference GLA/4597/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not comply with the London Plan, for the reasons set out in paragraph 48 of the above-mentioned report; but that the possible remedies set out in the paragraph could address these deficiencies.

If your Council subsequently resolves to grant permission on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, a statement of any conditions the authority proposes to impose and (if applicable) a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

If your Council resolves to refuse permission it need not consult the Mayor again (pursuant to Article 5(2) of the Order), and your Council may therefore proceed to determine the application without further reference to the GLA. However, you should still send a copy of the decision notice to the Mayor, pursuant to Article 5 (3) of the Order.

Please note that the Transport for London case officer for this application is [REDACTED], email [REDACTED]
[REDACTED]

Yours sincerely,



John Finlayson
Head of Development Management

cc Dr Onkar Sahota, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL
[REDACTED] Land Use, 43 Charlton Street, London NW1 1JD

13 May 2019

Durston House School

in the London Borough of Ealing

planning application no.191182FUL

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

Redevelopment of the Durston House Sports Ground to provide a part two and part three-storey school building and associated landscaping works. The redevelopment of three existing school buildings for 17 residential units.

The applicant

The applicant is **Durston House School**, and the architect is **ADP**.

Strategic issues

Principle of development: The proposal would result in a loss of open space and playing field. Any such loss must be clearly outweighed by public benefits, including a robust community use package to be secured by Section 106 agreement. The reconversion of the existing school sites at 26 and 12-14 Castlebar Road and 9 Longfield Road to residential use is supported in principle (Paragraphs 11-17).

Affordable housing: In the absence of an agreed viability position the absence of an affordable housing contribution is unacceptable (paragraphs 19-26).

Urban design: The proposed design, scale, internal configuration and layout of the school and residential buildings do not raise any strategic design concerns. The Council should secure key details of facing materials to ensure a high-quality building is delivered (Paragraphs 22-34).

Sustainable development: The applicant is required to submit further information regarding; carbon savings, renewable energy, flood risk and drainage to confirm London Plan compliance (Paragraphs 35-36).

Transport: The applicant must address transport issues with respect to; vehicle parking design and quantum, blue badge parking, cycle parking design and quantum and school travel plan (Paragraphs 37-44).

Recommendation

That Ealing council be advised that the application does not comply with the London Plan for the reasons set out in paragraph 48 of this report. 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 18 March 2019 the Mayor of London received documents from Ealing 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 must 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 Category of the Schedule to the Order 2008:

- 3D.1.(A) *"Development which is likely to prejudice the use as a playing field of more than 2 hectares of land which is used as a playing field at the time the relevant application for planning permission is made"*.

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

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

Site description

5 The 1.3 hectare site is allocated as both playing fields and community open space. The sites primary point of entrance is located on the north side of Carlton Road with a secondary vehicular access point available on Castlebar Road. The site is bound on its northern, western and southern (beyond Carlton Road) edges by suburban low density residential dwellings. To the east of the site is higher density residential flats. South of the plot, beyond Carlton Road at the sites eastern edge is the Haven Green Conservation Area which extends further south and east of the site. The site is currently in use as the school playing fields for Durston House School with access only to pupils for break times and physical education lessons. There is an informal arrangement between the school to allow neighbouring residents which to use the tennis courts outside of school hours in the summer months, outside of this there is no access to the playing fields for members of the general public.

6 The residential component of the scheme is proposed across three distinct sites all of which are currently in use for educational purposes. All of the sites are located in the Haven Green Conservation Area and are locally listed. 12-14 Castlebar Road comprises a 4-storey, 19th Century semi-detached townhouses. The property includes a purpose-built 2-storey addition to the rear of the building alongside Eaton rise. 26 Castlebar Road consists of a 3-Storey, 19th Century red brick building. The west flank of the building fronts onto Blakesley Avenue. 9 Longfield Road comprises a detached, 2-storey double fronted Victorian building. The building has been extended at basement and ground floor (rear) levels. The three buildings fall within area dominated by low-rise residential developments.

Details of the proposal

7 Redevelopment of the Durston House Sports Ground to provide a part two and part three-storey school building and associated landscaping works. The redevelopment of three existing school buildings for 17 residential units.

Case history

8 In April 2017 the applicant met with the GLA to discuss proposals for the redevelopment of the existing sports ground and potential residential redevelopment of the existing school buildings. GLA officers concluded that the principle of the educational use is supported in strategic planning terms, subject to the appropriate mitigation and minimisation of the loss of available playing field. Other issues with respect to design, sustainable development and transport were identified for resolution prior to submission of an application. As part of these pre-application discussions the applicant indicated that the existing school buildings would revert back to residential. However, no specific proposals were presented at that time.

Strategic planning issues and relevant policies and guidance

9 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2012 Core Strategy and 2013 Development Sites DPD, 2013 Development Management DPD, 2015 Joint west London Waste Plan, Planning for Schools DPD, 2013 Proposals Maps and the 2016 London Plan (Consolidated with Alterations).

10 The following are relevant material considerations:

- The National Planning Policy Framework (2019) and National Planning Practice Guidance;
 - Draft London Plan (2017) and Minor Suggested Changes, published in August 2018, which should be taken into account on the basis explained in the NPPF; and,
 - The decision in *R(McCarthy & Stone) v. Mayor of London*, which should be read alongside the Affordable Housing & Viability SPG.
-
- | | |
|---------------------------|--|
| • Education | <i>London Plan; Social Infrastructure SPG;</i> |
| • Playing fields | <i>London Plan;</i> |
| • Open land | <i>London Plan;</i> |
| • Housing | <i>London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG</i> |
| • Affordable housing | <i>London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG;</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy; and,</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy.</i> |

Principle of development

11 For the avoidance of doubt this report will separate the principle of development for the use of the existing playing fields for educational uses and the existing school sites for residential uses.

Education

12 London Plan Policy 3.17 and draft London Plan Policy S1 identify that additional and enhanced social infrastructure provision, including schools, is required to meet the needs of London's growing and diverse population. London Plan Policy 3.16 and draft London Plan Policy S3 both seek to ensure a sufficient supply of good quality educational choice to meet the demands of a growing population. At the local level there was an identified shortfall of 3.5 primary forms of entry in 2016 and an expected shortfall of 19 secondary forms of entry in 2019 within Ealing. The proposals would result in 108 additional pupil spaces. Whilst this is in a private school, it is acknowledged that the proposed provision would support educational choice and indirectly respond to general educational need in Ealing and neighboring boroughs by relieving pressure on the state school system.

13 The nature and dispersal of existing school buildings lend themselves well to residential conversion. Nevertheless, it is noted that this proposal would extinguish the existing D1 use at these sites, albeit, the school itself is relocating to a building of greater floorspace/capacity nearby. Whilst, as discussed above, the proposed residential conversion of these sites is supported in strategic planning terms, the Council must be satisfied that these existing sites are surplus to local social infrastructure requirements in line with London Plan Policy 3.16 and draft London Plan Policy S1.

Open space

14 London Plan Policy 7.18 resists the loss of open spaces unless equivalent or higher quality provision is made within the local catchment area. It also states that replacement of one type of open space with another is unacceptable unless an up-to-date needs assessment shows that this would be appropriate. Policy G4 within the draft London Plan states that local green and open spaces should be protected, and promotes the creation of new areas of publicly-accessible green and open space – especially in areas of deficiency. GLA officers note that through the Local Plan the site falls within an area of park deficiency. The proposal comprises 2,400 sq.m. of built footprint at the site. Taking account of the existing characteristics of the site (including hard surfaced areas and buildings), the proposal would remove 2,183 sq.m of land that is currently green and undeveloped. This is equivalent to 16.8% of the total site area. Any such loss must be clearly outweighed by public benefits, including a robust community use package to significantly enhance public access to the site, and to be secured by Section 106 agreement (refer below).

Playing fields and community use

15 London Plan Policy 3.19 and draft London Plan Policy S5 both seek to ensure that the capital has a sufficient supply of good quality sports and recreation facilities. To this end these policies direct planning decisions to resist the loss or degradation of such facilities and to seek to secure their enhancement. Whilst there is some informal public access afforded to the properties which neighbour the northern boundary of the site (to use the tennis courts in the summer months, outside of school hours), it has been confirmed that at present there is no public access to the site beyond this informal arrangement. GLA officers note that the proposal (including hard/soft landscaping and access) would result in a net loss of 3,040 sq.m. of playing field area at the site (including the existing hard surface tennis courts). The applicant proposes to mitigate this loss through the provision of an indoor sports facility; an outdoor astro turf pitch (for intensified

use); and other enhancements to the offer of the site - including a formal community use strategy. The applicant has provided a community use statement which outlines proposals to allow members of the public/community groups to hire the proposed facilities at Castlebar Field and its existing land at Swyncombe Avenue. Whilst the proposal to enhance community use at the site is supported in principle, GLA officers seek further discussions with the applicant and Ealing Council on the detail of community use arrangements – particularly in terms of the hours of community use and the affordability of community hire rates to be secured as part of any Section 106 agreement.

Housing

16 London Plan Policy 3.3 and draft London Plan Policy H1 seeks to increase the supply of housing in the capital, setting Ealing Council an annual target of 1,297 homes per annum in the London Plan. The proposed development would deliver up to 17 homes, equating to 1.3% of the annual monitoring target set in the London Plan. Draft London Plan Policy H1 increases this annualised target to 2,807. This increase in annual housing targets evidences the continued need for housing in the borough. The draft London Plan increases the emphasis on utilising small sites seeking to ensure small sites should play a much greater role in housing delivery. The proposals seek to convert 3 existing school buildings into residential units. The three sites, as described at paragraph 6 comprise small sites and so there is a presumption in favour of small housing development between 1 and 25 homes unless it can be demonstrated there would be an unacceptable level of harm. As discussed below in the urban design and housing sections of this report, GLA officers are satisfied that the residential component of this scheme does not present unacceptable harm and is accordingly supported in principle.

Principle of development conclusion

17 The proposal would result in a loss of open space and playing field. Any such loss must be clearly outweighed by public benefits, including a robust community use package to be secured by Section 106 agreement. The reconversion of the existing school sites at 26 and 12-14 Castlebar Road and 9 Longfield Road to residential use is supported in principle.

Housing

18 The proposed development would deliver 17 residential units across the 3 existing school sites with the following combined mix:

Unit size	Private	Social rented	Shared Ownership	Total
One bed	10	0	0	10 (59%)
Two bed	4	0	0	4 (23%)
Three bed	2	0	0	2 (12%)
Four bed	0	0	0	0 (0%)
Five bed	1	0	0	1 (6%)
Total	17	0	0	17

Table 1: Proposed residential mix

Affordable housing

19 London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 and Policy H6 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. The Mayor's Affordable Housing and Viability Supplementary Planning Guidance seeks to increase the provision of affordable housing in London and embed affordable housing into land prices. The SPG introduced a threshold approach to viability, which is incorporated within draft London Plan Policy H6. Schemes that provide 35% affordable housing on privately-owned land, without public

subsidy, and meet the specified tenure mix are not required to submit viability information nor be subject to a late stage review; however, publicly owned land is required to provide 50% affordable housing to qualify for the Fast Track route.

20 Policy H7 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined in partnership with the local planning authority and the GLA. The scheme is currently proposing no on-site affordable housing. In the absence of an agreed viability position at this time, the absence of an affordable housing contribution is unacceptable. The scheme is subject to the 35% threshold within draft London Plan Policy H6 and the Mayor's Affordable Housing and Viability SPG - which in this case is equivalent to between five and six affordable homes (by unit). Following conclusion of a robust process of independent viability review, GLA officers seek further discussions with the applicant and Ealing Council to with respect to the on-site delivery of the maximum level of affordable housing in line with London Plan Policy 3.12 and draft London Plan Policy H6. Early and late stage reviews should also be secured in line with London Plan Policy H6 to ensure the scheme delivers the maximum amount of affordable housing.

Residential mix

21 London Plan Policy 3.8 encourages new developments to offer a range of housing choices in terms of mix and size. Draft London Plan Policy H12 recognises that a higher proportion of one and two-bedroom units is generally more appropriate in more central or urban locations and states that boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes. In strategic planning terms the mix is acceptable.

Urban design

School building/site

22 London Plan Policies 7.1 and 7.4 and draft London Plan Policies D1 and D2 require development to have regard to the form, function and structure of an area and the scale, mass and orientation of surrounding buildings. The block would range between 1/3-storeys in height which responds appropriately to the, low rise suburban surrounds. The scale minimises the impact of the development in linear views, which is supported. The layout of the scheme concentrates the development to the southern portion of the site fronting Carlton Road which provides natural screening to the playing fields which form the rear of the plot. The built form of the proposal is contemporary and finished in high quality materials which provide for a well-designed scheme.

23 The overall height, massing, layout and elevational treatments of the scheme are broadly acceptable in strategic design terms. Having regard to the submitted plans and visualisations, and the characteristics of the wider area and urban setting, the proposals are in accordance with relevant London Plan and draft London Plan policies.

Residential sites

24 12-14 Castlebar Road will be converted into 8 flats with the rear extension being converted into 3 townhouses. The sites existing layout will be retained with the main building fronting onto Castlebar Road being converted into 8 residential dwellings and the extension to the rear fronting Eaton rise converted into three townhouses. The applicant is proposing to demolish an infill on the rear elevation of the building which connects the original building to the rear extension. This will return the main building to its original building line and instate a separation between the 3 terrace houses proposed and the main building. The applicant is advancing a simple architectural treatment

which seeks to reinstate the original features of the original building and ensure that the townhouses to the rear of the plot reflect the character of the wider residential area. The height of the proposals are not subject to change and the massing is proposed to be reduced through the removal of the infill extension between the main building and rear extension. The materials will reflect the original building and surrounding residential properties which is supported. The proposed development at 12-14 Castlebar Road does not present any strategic design concerns.

25 26 Castlebar Road will be converted into 5 flats through the reconfiguration of internal spaces to accommodate residential floorplates. The existing site layout will be retained with the primary access off Castlebar Road and a vehicular access to the west of the plot off Blakesley Avenue. The height and massing of the existing building is not proposed to be changed with the external form of the building not proposed to be altered. Where any external works are proposed all materials will match the existing building. The alterations proposed do not present any strategic design concerns and speak more cohesively to the surrounds than the existing building.

26 9 Longfield Road is proposed to be converted into a single 5 bed dwelling. The existing site layout will be retained with access to the property from Longfield Road. The external parameters of the building are not subject to change and where any external alterations are proposed the materials will match the existing building. The conversion of the property to residential use and respond positively to their surroundings.

Residential quality

27 London Plan Policy 3.5 'Quality and Design of Housing Developments' and draft London Plan Policy D4 promote quality in new housing provision, with further guidance provided by the Mayor's Housing SPG. The application documents confirm that all units meet or exceed minimum space standards and all units benefit from amenity space which meets the minimum standards set out in the Mayor's Housing SPG.

Heritage

28 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should *"have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"* and in relation to conservation areas, special attention must be paid to *"the desirability of preserving or enhancing the character or appearance of that area"*. London Plan Policy 7.8 'Heritage Assets and Archaeology' states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. London Plan Policy 7.8 also applies to non-designated heritage assets. The NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, and a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset. The three proposed residential sites are situated within the Haven Green Conservation Area and are locally listed. The application sites do not contain any listed buildings, however, 28-30 Castelbar Road is Grade II Listed and in close proximity to 26 and 12-14 Castlebar Road.

29 The proposed conversions relate more positively to 28-30 Castelbar Road (Grade II) than the existing buildings, is more sensitively designed to reflect the proportions and plot widths of building frontages, and would make a positive contribution to the streetscene and Conservation Area. Further, given the separation which exists between the proposed developments and the heritage asset which fall beyond Blakesley Avenue GLA officers are satisfied that there would be no harm to the setting of the asset. The redevelopment of the site would make the most efficient use of land and optimise residential uses which is supported from a strategic perspective. The proposed

scheme appreciably improves the existing situation by more closely aligning the buildings with their original form and introduces high quality architecture, which is scaled to address the established character of the area.

30 The existing playing field at Carlton Road is located within the Haven Green Conservation Area. The applicant has submitted a Heritage Statement which identifies that the school building will deliver minor harm to the character and appearance of the Haven Green Conservation Area. It is acknowledged that the scheme will deliver a significant quantum of new development on this site which is currently open land, this will be highly visible within a prominent site along Carlton Road. GLA officer acknowledge that efforts have been taken to minimise this visual impact by high quality architectural design, consolidation of the significant quantum of development to the southern edge of the plot and the efficient internal design which seeks to minimise the size of the development. The public benefits proposed to be delivered by the scheme, including; increased access to playing fields for the local community, provision of housing outweigh the less than substantial harm to the setting and character of the Haven Green Conservation Area.

31 Having regard to the statutory duties in respect of listed buildings in the Planning (Listed Buildings and Conservation Areas) Act 1990, and the NPPF in relation to listed buildings and non-designated heritage assets, GLA officers consider that the proposed redevelopment of the sites would not cause any harm to the historic significance of the Grade II Listed 28-30 Castelbar Road. As set out elsewhere within this report, the proposed design-led, redevelopment will make the most efficient use of the application sites and deliver a new housing, including an affordable housing contribution. In relation to the school building and the minor harm identified within the applicants heritage statement, GLA officers consider that sufficient public benefit exists, including housing provision, to outweigh the less than substantial harm identified.

Inclusive access

32 Policy 7.2 of the London Plan and D3 of the draft London Plan both require all new development to achieve the highest standards of accessible and inclusive design.

Residential sites

33 The existing main school building has limited level access across the site. Within the building there is only stepped access. The townhouses, which are proposed to the rear of the plot will have level access and the ground floors will be designed to be adaptable to be compliant with Part M category 2 Accessible and Adaptable Dwellings. The prep school will utilise the existing staircase for access but has a generous enough path to accommodate the installation of a ramp if required. The ground floor flat will be compliant with Part M Category 2 Accessible and Adaptable Dwellings. The existing junior school at Longfield Road will be converted into a single dwelling which at ground floor can be altered to suit Part M Category 2 Accessible and Adaptable Dwellings. Given the existing situation across the sites, the constraints of converting the internal spaces and making alterations to the external spaces of these locally listed buildings, in this instance, the above arrangements are acceptable given the specific circumstances of the application sites.

School site

34 The proposals are being developed to ensure that the school would be fully accessible. The scheme is designed to meet the recommendations of Part M and BS 8300-2:2018 with level thresholds throughout. The internal corridors are sufficiently wide to accommodate wheelchairs and each floor of the development is accessible via a platform lift. This is supported.

Sustainable development

Energy

35 In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the draft London Plan, the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions. In summary the proposed strategy comprises: energy efficiency measures (including a range of passive design features and demand reduction measures); a site heat network driven by combined heat and power plant; and, renewable technologies (comprising photovoltaic panels). The proposed approaches carbon savings cannot be verified for both the residential and non-residential components of the scheme. Whilst the principles of the energy strategy are supported, the applicant must provide further information to allow the carbon savings to be verified.

Flood risk and drainage

36 The approach to flood risk management for the proposed development complies with London Plan policy 5.12 and draft London Plan Policy SI.12. The surface water drainage strategy for the proposed development does not comply with London Plan policy 5.13 and draft Policy SI.13, as it does not give appropriate regard to the drainage hierarchy and greenfield runoff rate. The proposed development is in general accordance with the requirements of London Plan Policy 5.15 and draft London Plan Policy SI.5. a full technical note has been issued to the applicant and LPA which must be responded to in full prior to the Mayor's decision making stage.

Transport

37 London Plan Policy 6.1 and draft London Plan Policy T1 require developments to make the most effective use of land and have sufficient regard to their transport impacts.

Cycle parking

38 Cycle parking should be provided to be in line with the draft London Plan standards, contained within Table 10.2. Cycle parking design should be in accordance with London Cycle Design Standards (LCDS). For the school site 48 cycle spaces are proposed. This is beneath the quantum required by the London Plan and must be increased. The design of the cycle stores must be confirmed and should be in accordance with the guidance above. The 80 scooter spaces provided are presently unjustified. The residential cycle parking meets the quantum required by the London Plan, the cycle storage design is unsuitable and must be revised.

Vehicle parking

39 London Plan Policy 6.13 and draft London Plan Policy T6 require developments to provide the appropriate level of car parking provision. Current access to Castlebar Field is off Carlton Road. The staff car parking arrangements are not consistently described through the application documents and plans. The quantum and design of the vehicle parking provision for the school must be clarified prior to the Mayor's decision making stage.

40 In line with draft London Plan this development should be car-free except for provision for blue badge holders. Provision of infrastructure for electric or other Ultra-Low Emission vehicles must be provided. 20% of all spaces should have active charging provision with the remaining 80% to be fitted with passive provision. The Council is advised also to secure a car-and-permit free legal agreement in respect of the residential units.

Trip rate and mode share assessment

41 A trip generation assessment has been acceptably undertaken for all elements of the proposal. It has been demonstrated that there is unlikely to be an adverse impact on the capacity of public transport modes or on the strategic road network. It is nevertheless noted that there may be significant impacts on the local highway network. Ealing Council will need to carefully consider this, and both the Council and the school should seek to promote a shift away from private vehicles to more sustainable modes as part of the school travel plan (refer below).

Servicing, school travel plan and construction

42 The swept path analysis demonstrates that servicing will be possible from within the arrival courtyard but that this would need to occur outside of school hours when the car park is likely to be occupied by other vehicles. This must be secured by condition.

43 The submission of a draft school Travel Plan is welcomed. The school should look to meet accreditation through the STARS initiative. The final Travel Plan and any measures or financial requirements should be secured, enforced, funded, and monitored as part of the Section 106 (s106) agreement.

Transport conclusion

44 The applicant must address transport issues with respect to; vehicle parking design and quantum, blue badge parking, cycle parking design and quantum.

Local planning authority's position

45 The Local Authority is currently considering the application and targeting a Planning Committee on 19 June 2019. It is understood that Council officers support the scheme in principle.

Legal considerations

46 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

47 There are no financial considerations at this stage.

Conclusion

48 London Plan and draft London Plan policies on; education, playing fields, open space, community uses, housing, affordable housing, design, environment and transport are relevant to this application the application does not yet fully comply with the London Plan or draft London Plan, but the resolution of the following issues could lead to the application becoming compliant.

- **Principle of development:** The proposal would result in a loss of open space and playing field. Any such loss must be clearly outweighed by public benefits, including a robust community use package to be secured by Section 106 agreement. The reconversion of the existing school sites at 26 and 12-14 Castlebar Road and 9 Longfield Road to residential use is supported in principle.
- **Affordable housing:** In the absence of an agreed viability position the absence of an affordable housing contribution is unacceptable.
- **Urban design:** The proposed design, scale, internal configuration and layout of the school and residential buildings do not raise any strategic design concerns. The Council should secure key details of facing materials to ensure a high-quality building is delivered.
- **Sustainable development:** The applicant is required to submit further information regarding; carbon savings, renewable energy, flood risk and drainage to confirm London Plan compliance.
- **Transport:** The applicant must address transport issues with respect to; vehicle parking design and quantum, blue badge parking, cycle parking design and quantum and school travel plan.

Juliemma McLoughlin, Assistant Director – Planning

[REDACTED], Deputy Head of Development Management

Strategic Planner, Case Officer

[REDACTED]

From:
Sent: 29 April 2020 14:55
To:
Subject: RE: Durston House School

I have also been asked by a resident to highlight the below issues:

- 1 The new school classrooms will give less space per pupil because the amount of pupils per class will rise from approx. 14 to 20.
- 2 The new sports Hall will obviously give less protection to the boys than playing on 1.3ha of outdoor green open space.
- 3 In the last 12 years only 38 pupils have left Durston House school to have secondary education in the Borough.

Also – would you mind letting me know when it officially moves to stage 2?

Thank you!

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 29 April 2020 12:11
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Durston House School

Hi [REDACTED]

Thank you I am well and I hope my email finds you well

We have had some renewed public interest the last few days but in terms of updates nothing particularly substantial. We have been working with the Council to better understand their financial calculations and are yet to hear back.

I would expect the stage 2 to go 'live' in the coming weeks but as yet we do not have a fixed date or even outline programme for that but happy to let you know as soon as we do

Sincerely

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management
GREATER LONDON AUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk
[REDACTED] [london.gov.uk](https://www.london.gov.uk)

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 27 April 2020 22:43

To: [REDACTED] [REDACTED] <[REDACTED]@[london.gov.uk](mailto:[REDACTED]@london.gov.uk)>

Subject: Durston House School

Heya,

Hope you're well!

Covid happens and yet some things don't change...

I was wondering if I could get an update on what is happening with this planning application?

Thank you!

[REDACTED] [REDACTED] [REDACTED]
Research and Support Officer to Onkar Sahota AM

London Assembly **Labour**

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

Tel: 020 7983 [REDACTED]

[london.gov.uk](https://www.london.gov.uk)

[REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

my pronouns are: [REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 29 April 2020 15:00
To: [REDACTED]
Subject: RE: Durston House School

No worries, thank you.

Sincerely

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](https://www.london.gov.uk)

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 29 April 2020 14:59
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Durston House School

Honestly, I just copied and pasted it straight from the constituent correspondence – will ask him for clarification!

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 29 April 2020 14:58
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Durston House School

Hi [REDACTED]

Yes, no problem I can let you now when the Stage 2 goes 'live'.

Do you mind clarifying point 2 please, I am not sure I understand what is meant?

Sincerely

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk

[\[REDACTED\]@london.gov.uk](mailto: [REDACTED]@london.gov.uk)

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 29 April 2020 14:55
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Durston House School

I have also been asked by a resident to highlight the below issues:

- 1 The new school classrooms will give less space per pupil because the amount of pupils per class will rise from approx. 14 to 20.
- 2 The new sports Hall will obviously give less protection to the boys than playing on 1.3ha of outdoor green open space.
- 3 In the last 12 years only 38 pupils have left Durston House school to have secondary education in the Borough.

Also – would you mind letting me know when it officially moves to stage 2?

Thank you!

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 29 April 2020 12:11
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Durston House School

Hi [REDACTED]

Thank you I am well and I hope my email finds you well

We have had some renewed public interest the last few days but in terms of updates nothing particularly substantial. We have been working with the Council to better understand their financial calculations and are yet to hear back.

I would expect the stage 2 to go 'live' in the coming weeks but as yet we do not have a fixed date or even outline programme for that but happy to let you know as soon as we do

Sincerely

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management
GREATER LONDON AUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk

[\[REDACTED\]@london.gov.uk](mailto: [REDACTED]@london.gov.uk)

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 27 April 2020 22:43

To: [REDACTED] [REDACTED] <[REDACTED]@[london.gov.uk](mailto:[REDACTED]@london.gov.uk)>

Subject: Durston House School

Heya,

Hope you're well!

Covid happens and yet some things don't change...

I was wondering if I could get an update on what is happening with this planning application?

Thank you!

[REDACTED] [REDACTED] [REDACTED]
Research and Support Officer to Onkar Sahota AM

London Assembly **Labour**

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

Tel: 020 7983 [REDACTED]

[london.gov.uk](https://www.london.gov.uk)

[REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

my pronouns are: [REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 30 April 2020 14:57
To: [REDACTED]
Subject: RE: Durston House School

Perfect, thank you for this I will retain the below for the Stage 2

Sincerely

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

020 7983 [REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](https://www.london.gov.uk)

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 30 April 2020 13:46
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Durston House School

[REDACTED] response below.

Hi [REDACTED]

Not sure if I replied yesterday but to clarify this point it refers both directly to the current Covid issues & also any future more common virus' (colds, flu etc) & protections against them. The new application includes a mix use Sports Hall / assembly Rooms / Canteen. This will be the size of two badminton courts (approx 40 feet X 88 feet) & will be used by 540 pupils & 90 staff totalling 630 people. Any meaningful social distancing will be impossible in such a crowded space. This is now more relevant than ever & whilst Covid 19 is a new virus, it is not the only virus and other virus' are present and will affect us in the future. Some virus' tend to affect younger children disproportionately. One aspect of this & many other virus' is the need for vitamin D which comes from being outside in the fresh air and getting natural sunlight. This is important for adults but especially relevant & vital to boys who are growing and aged 5 to 13. Any doctors or health educationalists will explain why doing activities outside is better, healthier and safer for young boys far better than I can. Many sporting activities which currently take place outside will now take place indoors. Importantly no consideration has been taken to what happens at lunchtime when the meals are being prepared, served & cleared away. It is logical to assume this will need to be on a rotation basis, lunch period at present on the school timetable runs from 12:30 to 1:30pm. Therefore during the important lunch break there will be no indoor sports hall available for use, as it will be used for Lunches. The result is that 540 children & any supervisory staff will be crammed onto the astro turf area of 2,370m² for play at lunchtime. If the weather is not good (often the case) the break will have to take place on the classroom. At present this is not the case as there is a large Pavillion that can be used & two all weather sports courts. The all weather courts are illogically being removed for no clear reason. No one has been able to give a reason as to why these all weather surfaces are being removed & they are used daily. The new buildings do not cover any of this area.

There is also another area that has not been tightened up at all & this is around the staffing levels. There is a planning restriction that has lead to a limit on staff numbers to 90. This is probably a highways, travel & parking impact reason & has therefore lead to this being applied. However this will not be effective at all because this applies to directly employed staff by Durston & is swerved around by giving contracts to outside companies that are not registered as Durston staff. For example there are no catering staff at present but around 40/50 will be needed to receive goods, prepare food, serve food & clear food away. When the planning officer was questioned about this his reply was this was for the school to organise but it is very relevant to staffing levels & the conditions & therefore requires far more scrutiny. The school have said that this will be done by current staff (largely teachers). This is news to the teachers and is again part of the misleading & dishonest way answers are given. The residents would suggest this will be sub contracted out as maintenance is currently & manages to give by pass one important part of the conditions applied.

Hope this helps,

Regards,

[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 29 April 2020 15:00
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Durston House School

No worries, thank you.

Sincerely

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk
[REDACTED]@london.gov.uk

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 29 April 2020 14:59
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Durston House School

Honestly, I just copied and pasted it straight from the constituent correspondence – will ask him for clarification!

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 29 April 2020 14:58
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Durston House School

Hi [REDACTED]

Yes, no problem I can let you now when the Stage 2 goes 'live'.

Do you mind clarifying point 2 please, I am not sure I understand what is meant?

Sincerely

[REDACTED]

[REDACTED] [REDACTED]

Senior Strategic Planner, Development Management

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

020 7983 [REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 29 April 2020 14:55

To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: Durston House School

I have also been asked by a resident to highlight the below issues:

- 1 The new school classrooms will give less space per pupil because the amount of pupils per class will rise from approx. 14 to 20.
- 2 The new sports Hall will obviously give less protection to the boys than playing on 1.3ha of outdoor green open space.
- 3 In the last 12 years only 38 pupils have left Durston House school to have secondary education in the Borough.

Also – would you mind letting me know when it officially moves to stage 2?

Thank you!

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 29 April 2020 12:11

To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: Durston House School

Hi [REDACTED]

Thank you I am well and I hope my email finds you well

We have had some renewed public interest the last few days but in terms of updates nothing particularly substantial. We have been working with the Council to better understand their financial calculations and are yet to hear back.

I would expect the stage 2 to go 'live' in the coming weeks but as yet we do not have a fixed date or even outline programme for that but happy to let you know as soon as we do

Sincerely

[REDACTED]
[REDACTED]
Senior Strategic Planner, Development Management
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](https://www.london.gov.uk)

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 27 April 2020 22:43
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: Durston House School

Heya,

Hope you're well!

Covid happens and yet some things don't change...

I was wondering if I could get an update on what is happening with this planning application?

Thank you!

[REDACTED]
Research and Support Officer to Onkar Sahota AM
London Assembly Labour
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
Tel: 020 7983 [REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](https://www.london.gov.uk)

my pronouns are: [REDACTED]

[illegible]

From: [REDACTED]

Sent: 15 May 2020 18:11

To:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Jules Pipe

<[london.gov.uk](#)>

Subject: FW: Sports England : Internal Review-Durston House School-

Dear All,

Hoping you are all fine and well & coping OK with the current Covid situation.

I have just received the following documents from Sports England in reply to a FOI request. The following has become apparent today from reading the emails & documents :

- 1 The Planning officer refers to the application on 2nd April 2019 as an “ obviously contentious application”.
- 2 On 15th May 2019 the Planning Officer misleads Sports England in an email stating : “ no community use exists” but this is not correct – there is community use & is enjoyed by over 33% of the local residents who have it.
- 3 The planning officer discusses Community Use at Swyncombe which he has no control over as it is in the borough of Hounslow. His remit only covers the Borough of Ealing.
- 4 **Hounslow had already rejected Community Use , in support of objections from Hounslow residents. I can send over the decision & appeal decision if required.**
- 5 The planning officer makes references to marking out the sand area AGP but there is no sand area in the application
- 6 Asks for the applicant to confirm parking arrangements for Community Use but none exists at present.
- 7 Refers to the New Sports Hall as having two Tennis Courts, however these are badminton courts which are smaller & have a different playing surface.
- 8 Sports England state that the Sports Hall will not be of use for Community Use as it’s playing surface has limited

use.

9 Sports England state that "The Sports Hall is unlikely to have any additional sporting benefits to the wider community given its limited size & lack of Sports Markings

10 Sports England state "There is no need for an Artificial Surface in this Location".

11 Sports England state "the artificial surface will have limited use to the community as it has no floodlights & due to its lack of size. (Monday to Friday use would be only after 7pm & most of the year it would be dark).

All this has been ignored by the planning officer and also stated that the school was :

1 Being converted back to residential use : All school buildings on Castelbar were built in the 1886's & 1893 as schools and have never been used as residential.

2 The School is next to residential houses. The School flanks Harvington Private Prep School

3 Durston Building are Terraced buildings : They are detached school buildings.

What can we think of a planning department when they do not know the basics of the history of the site & if the buildings are terraced or detached. How can they not know the school sits next to another school that will remain as a school if the buildings are converted for residential use. Quite amazing & raises questions about how well this application has been handled.

Regards,

[REDACTED]

----- Forwarded Message

From: [REDACTED] <[\[REDACTED\]@sportengland.org](mailto:[REDACTED]@sportengland.org)>

Date: Fri, 15 May 2020 15:43:56 +0000

To: [REDACTED]

Cc: FOI <foi@sportengland.org>

Subject: Internal Review-Durston House School-

Dear [REDACTED]

Please find attached Sport England's response to your February 19, 2020 request for information. I apologise for the delayed response which is addressed in the body of the attached letter.

Thank you,

[REDACTED]

Senior In-House Solicitor

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 04 December 2018 10:20
To: [REDACTED]
Subject: RE: Durston House, Ealing - plans for new school on playing field

Hi [REDACTED]

I was going to call you with an update. Are you around this today?

Regards

[REDACTED]

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [REDACTED]

From: [REDACTED]
Sent: 04 December 2018 09:24
To: [REDACTED]
Subject: FW: Durston House, Ealing - plans for new school on playing field

Hi [REDACTED]

How did the meeting with Durston House go?

I've got a meeting regarding the proposal first thing this Thursday so it would be useful to have your thoughts and any feedback by then if possible.

Many thanks

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 26 November 2018 12:37

To: [REDACTED]

Subject: RE: Durston House, Ealing - plans for new school on playing field

Hi [REDACTED]

[REDACTED]

I haven't seen any documents relating to the community consultation exercise I asked the school to undertake or any subsequent documents such as the CSDP, management models, etc.

I hope this proves useful, let me know how it goes.

Regards

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: 26 November 2018 11:55

To: [REDACTED]

Subject: RE: Durston House, Ealing - plans for new school on playing field

Hi [REDACTED]

I am, they are coming over to see me in the afternoon.

It would be good to know your current position.

Regards

[REDACTED]
We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [REDACTED]

From: [REDACTED]

Sent: 26 November 2018 10:39

To: [REDACTED]

Subject: Durston House, Ealing - plans for new school on playing field

Hi [REDACTED]

Just a quick one....are you meeting this Wednesday with Durston House, Ealing W5 to discuss the proposed development of a new school build on the playing field?

Let me know and I'll send you what I've discussed with them previously.

Regards

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 03 April 2019 15:49
To: [REDACTED]
Subject: [REDACTED] & 191182FUL - Durston House School

Hi [REDACTED],

Thank you for your email.

[REDACTED]

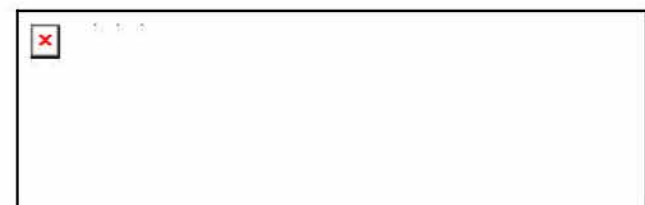
Thank you for the prior notice about Durston House. I did provide some pre-application comments so I will be interested to see what has actually forms the application. I may have to liaise with Sport National Governing Bodies on this application so I might not be able to provide comments to you really quickly but I will try to get our consultation response to you as soon as I can.

Best of luck for the swim.

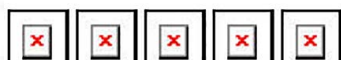
Kind Regards

[REDACTED]

[REDACTED]



1st Floor, 21 Bloomsbury Street, London, WC1B 3HF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [REDACTED]

From: [REDACTED]
Sent: 02 April 2019 15:32
To: [REDACTED]
Subject: [REDACTED] & 191182FUL - Durston House School

Good afternoon [REDACTED]

Durston House School

Separately, 191182FUL (Durston House School) should be processed today by our validation team. This includes a circa 5,000 sq. m. school being built on the school's current sports ground. Obviously a contentious application. The applicant advised they have had pre app with yourselves and have discussed the application extensively with [REDACTED] from Ealing Council [REDACTED], so I'm hoping they have resolved the major concerns within their application. The reason I'm flagging this early doors is [REDACTED] want to wrap up as much of this as possible so I don't have to leave my colleague in the lurch picking up mid application. Anything you can do to expedite comments on this one would be much appreciated.

Kind regards,

[REDACTED]

[REDACTED]



NOTE: The advice given by Council officers in response to pre-application enquiries does not bind the Council's decision making or constitute a formal decision by the Council as Local Planning Authority. Any views or opinions expressed are given in good faith and to the best of our ability without prejudice to the formal consideration of any planning application following statutory public consultation.



Please consider the environment before printing this email.

The content of this email and any attachment transmitted within are

[REDACTED]

From: [REDACTED]
Sent: 15 May 2019 09:54
To: [REDACTED]
Subject: RE: App Ref: 191182FUL Durston House School Sports Ground.

Thanks for the update [REDACTED]

Kind Regards

[REDACTED]
[REDACTED]
[REDACTED]



1st Floor, 21 Bloomsbury Street, London, WC1B 3HF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Erin Stephens](#)

From: [REDACTED]
Sent: 15 May 2019 09:28
To: [REDACTED]
Subject: FW: App Ref: 191182FUL Durston House School Sports Ground.

Hi [REDACTED]

Just to keep you updated – the Durston meeting went well.

Topics discussed as follows:

- Ealing's sporting view is that currently no community use of either Castlebar (new school location) or Swyncombe Avenue (existing school Sports Ground) sites, so community use at both sites under a formal CUA will be of definite benefit to community sport; however to make effective community use a reality, Durston need to:
 - add detail to the existing documents submitted as part of the planning application especially the CUA => **school to populate the CUA with as much information as possible under each heading**
 - in the CUA confirm facilities available at Swyncombe Avenue and the opening hours of the site => **cricket pitch, football pitches (A & J), 2 cricket nets, small sand dressed pitch and changing rooms to be confirmed in CUA**
 - Middx Cricket has confirmed that there is current demand for the pitch for the 20 week season Saturday and Sunday 2019 or 2020 => **follow up meeting arranged with Middx Cricket**
 - Could mark out tennis courts on sand AGP => **school to confirm**
 - confirm management arrangements for community use at both sites as well as pricing, etc => **confirmed in the meeting that pricing would be in line with or cheaper than similar facilities and that primary school daytime use would be free of charge, to be included in CUA**
 - confirm operating hours - weekday evening and weekend use, hours can be different at each site => **emphasised that this was vital to any community use and non negotiable, include in CUA**
 - draft a CSDP based on interest shown to date including commitments from local clubs - details of hire/usage, include usage targets and what will be done to ensure the facilities are used by the community => **school to send a draft to me**
 - consider sports markings on proposed sand AGP on Castlebar site - athletics, tennis, small sided hockey => **school to confirm but current feeling is that they definitely do not want formal hockey use due to neighbours and compromising the openness of the site, might consider other informal sporting activities/uses e.g. children's athletics**
 - confirm car parking arrangements at both sites => **school to confirm, Disabled parking provision to be included in CUA**
- As well as full community use of both sites, the Council would be looking for a financial contribution to improving sport and recreation facilities in the local Castlebar area, the school could offer a financial contribution paid at agreed trigger points to either
 - Replace existing facilities i.e. playing field and 2 tennis courts or
 - Part fund priority projects from the PPS action plan e.g. full size floodlit sand AGP, athletics training venue**=> discussed the possibility of delaying any legally binding contribution until after the school was built for finance/cash flow reasons**

I haven't had any feedback from Durston as yet, but will keep you updated.

Regards

■

From: ■
Sent: 25 April 2019 09:29
To: ■
Subject: FW: App Ref: 191182FUL Durston House School Sports Ground.

Hi ■

Hope you're well.

Have you got 10 minutes tomorrow morning or Monday morning to discuss the Durston application?

I'm meeting with the development team early Tuesday so wanted to speak to you beforehand if possible.

Let me know if either is good for you.

Regards

[REDACTED]

From: [REDACTED]
Sent: 24 April 2019 16:05
To: [REDACTED]
Subject: FW: App Ref: 191182FUL Durston House School Sports Ground.

Hi [REDACTED]

Please see below from Sport England fyi.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 24 April 2019 15:57
To: [REDACTED]
Subject: App Ref: 191182FUL Durston House School Sports Ground.

Our Ref: PA/19/L/EA/51953

Dear [REDACTED],

Thank you for consulting Sport England on the above application.

Sport England – Statutory Role and Policy

It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework (particularly Para 97) and Sport England's Playing Fields Policy, which is presented within its 'Playing Fields Policy and Guidance Document' found at www.sportengland.org/playingfieldspolicy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all/part of a playing field, unless one or more of the five exceptions stated in its policy apply.

The Proposal and Impact on Playing Field

The application proposes the construction of a school and change of use of buildings. In terms of sport facilities, the proposal would result in an extensive loss of playing field and loss of two floodlight tennis courts however an artificial surface and sports hall is proposed that would be available for community use.

Assessment against Sport England Policy/NPPF

The proposed hybrid sports hall could be considered to mitigate the loss of the tennis courts given that the hall would have markings for two tennis courts. This, though, would be on the basis that the flooring would be suitable for tennis and that there is community access to the facility outside school hours. Both of these matters could be the subject of planning conditions if the application were to be approved. The sports hall is unlikely to have any additional sporting benefits for the wider community given its limited size and lack of other sport court markings.

As noted above, the works would also result in a considerable loss of playing field due to the proposed buildings and artificial surface. Although the applicant has attempted to mitigate some of this loss with the provision of an artificial surface, limited details have been provided regarding the proposed surface and given its size and lack of floodlighting it would have limited benefits to sport compared to the larger, more flexible, playing field that is likely to be able to accommodate a range of sports. Furthermore, there does not appear to be need for an artificial surface in this location, from a community sport perspective, provided the actions in the Council's Playing Pitch Strategy are delivered. The artificial surface would also leave a limited sized area of natural turf playing field that is unlikely to be used for any formal sport.

In light of the above, Sport England are unable to consider that there are sufficient benefits to the proposal to outweigh the loss of playing field consequently the proposal would not meet any of the exceptions of its Playing Field Policy. Sport England, therefore, advise that the proposal is reconsidered by reducing the extent of playing field lost or providing a replacement playing field (or equivalent) elsewhere in the locality.

Conclusion

In light of the above, Sport England **objects** to the application because it is not considered to accord with any of the exceptions to Sport England's Playing Fields Policy or with Paragraph 97 of the NPPF.

Should the local planning authority be minded to grant planning permission for the proposal, contrary to Sport England's objection then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State, via the National Planning Casework Unit.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

If you would like any further information or advice please contact me at the address below

Yours sincerely

[Redacted Signature]

[Redacted Address]

[REDACTED]

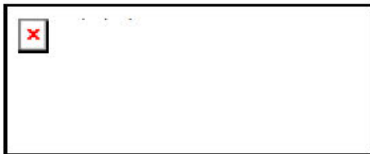
From: [REDACTED]
Sent: 26 April 2019 16:33
To: [REDACTED]
Subject: RE: App Ref: 191182FUL Durston House School Sports Ground.

Yeah, no problem.

Have a nice weekend.

[REDACTED]

[REDACTED]



1st Floor, 21 Bloomsbury Street, London, WC1B 3HF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [REDACTED]

From: [REDACTED]
Sent: 26 April 2019 14:57
To: [REDACTED]
Subject: RE: App Ref: 191182FUL Durston House School Sports Ground.

Hi [REDACTED]

No problem, can you do 10.15 on Monday as I've got a 10.30 meeting or 12noon?

Let me know

[REDACTED]

From: [REDACTED]

Sent: 26 April 2019 14:20

To: [REDACTED]

Subject: RE: App Ref: 191182FUL Durston House School Sports Ground.

Hi [REDACTED]

Sorry for not coming back to you sooner, I can do 10:30 on Monday if that works? (or this afternoon if you are around).

Kind Regards

[REDACTED]

[REDACTED]



1st Floor, 21 Bloomsbury Street, London, WC1B 3HF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [REDACTED]

From: [REDACTED]
Sent: 25 April 2019 09:29
To: [REDACTED]
Subject: FW: App Ref: 191182FUL Durston House School Sports Ground.

Hi [REDACTED]

Hope you're well.

Have you got 10 minutes tomorrow morning or Monday morning to discuss the Durston application?

I'm meeting with the development team early Tuesday so wanted to speak to you beforehand if possible.

Let me know if either is good for you.

Regards

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: 24 April 2019 16:05
To: [REDACTED]
Subject: FW: App Ref: 191182FUL Durston House School Sports Ground.

Hi [REDACTED],

Please see below from Sport England fyi.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 24 April 2019 15:57
To: [REDACTED]
Subject: App Ref: 191182FUL Durston House School Sports Ground.

Our Ref: PA/19/L/EA/51953

Dear [REDACTED]

Thank you for consulting Sport England on the above application.

Sport England – Statutory Role and Policy

It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework (particularly Para 97) and Sport England's Playing Fields Policy, which is presented within its 'Playing Fields Policy and Guidance Document' found at www.sportengland.org/playingfieldspolicy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all/part of a playing field, unless one or more of the five exceptions stated in its policy apply.

The Proposal and Impact on Playing Field

The application proposes the construction of a school and change of use of buildings. In terms of sport facilities, the proposal would result in an extensive loss of playing field and loss of two floodlight tennis courts however an artificial surface and sports hall is proposed that would be available for community use.

Assessment against Sport England Policy/NPPF

The proposed hybrid sports hall could be considered to mitigate the loss the of the tennis courts given that the hall would have markings for two tennis courts. This, though, would be on the basis that the flooring would be suitable for tennis and that there is community access to the facility outside school hours. Both of these matters could be the subject of planning conditions if the application were to be approved. The sports hall is unlikely to have any additional sporting benefits for the wider community given its limited size and lack of other sport court markings.

As noted above, the works would also result in a considerable loss of playing field due to the proposed buildings and artificial surface. Although the applicant has attempted to mitigate some of this loss with the provision of an artificial surface, limited details have been provided regarding the proposed surface and given its size and lack of floodlighting it would have limited benefits to sport compared to the larger, more flexible, playing field that is likely to be able to accommodate a range of sports. Furthermore, there does not appear to be need for an artificial surface in this location, from a community sport perspective, provided the actions in the Council's Playing Pitch Strategy are delivered. The artificial surface would also leave a limited sized area of natural turf playing field that is unlikely to be used for any formal sport.

In light of the above, Sport England are unable to consider that there are sufficient benefits to the proposal to outweigh the loss of playing field consequently the proposal would not meet any of the exceptions of its Playing Field Policy. Sport England, therefore, advise that the proposal is reconsidered by reducing the extent of playing field lost or providing a replacement playing field (or equivalent) elsewhere in the locality.

Conclusion

In light of the above, Sport England **objects** to the application because it is not considered to accord with any of the exceptions to Sport England's Playing Fields Policy or with Paragraph 97 of the NPPF.

Should the local planning authority be minded to grant planning permission for the proposal, contrary to Sport England's objection then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State, via the National Planning Casework Unit.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

If you would like any further information or advice please contact me at the address below

Yours sincerely

[Redacted signature]

[Redacted contact details]

[REDACTED]

From: [REDACTED]
Sent: 24 April 2019 14:18
To: [REDACTED]
Subject: RE: 191182FUL - Durston House School - Sport England

Hi [REDACTED],

I am just drafting them now. They will be with you by the end of the day.

Regards

[REDACTED]

[REDACTED]



1st Floor, 21 Bloomsbury Street, London, WC1B 3HF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [REDACTED]

From: [REDACTED]
Sent: 24 April 2019 12:27
To: [REDACTED]
Cc: Planning South <Planning.South@sportengland.org>
Subject: RE: 191182FUL - Durston House School - Sport England

Good afternoon [REDACTED]

Just touching base as I have noted that comments are due today. Are you in a position to share SE's comments with me?

Thanks.

Kind regards,

[REDACTED]

[REDACTED]



NOTE: The advice given by Council officers in response to pre-application enquiries does not bind the Council's decision making or constitute a formal decision by the Council as Local Planning Authority. Any views or opinions expressed are given in good faith and to the best of our ability without prejudice to the formal consideration of any planning application following statutory public consultation.

From: [REDACTED]
Sent: 05 April 2019 12:52
To: [REDACTED]
Subject: FW: 191182FUL - Durston House School

Good afternoon [REDACTED]

Please see below FYI from our [REDACTED]

Kind regards,

[REDACTED]

[REDACTED]



NOTE: The advice given by Council officers in response to pre-application enquiries does not bind the Council's decision making or constitute a formal decision by the Council as Local Planning Authority. Any views or opinions expressed are given in good faith and to the best of our ability without prejudice to the formal consideration of any planning application following statutory public consultation.



From: [REDACTED]
Sent: 05 April 2019 12:21
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: 191182FUL - Durston House School

Hi [REDACTED]

I'm away for a couple of weeks, so not wanting to hold the process up, Leisure's initial comments for you to feedback are as follows, I can send final comments and/or respond to any additional information when I'm back on the 23rd April and we can still meet your deadline:

Community Use Report comments:

- The school need to state the indoor and outdoor facilities available at Swyncombe Avenue Sports Ground to inform the hours of use and the type of potential usage – from an aerial picture.
- The CUA will be based on the Sport England template
- Weekend community use must include both Saturdays and Sundays – times can be different at each site
- Happy to agree that community hours of use are different at the two school sites.
- Ancillary facilities must be available at both sites for the community to use.
- School needs to confirm the management arrangements for community use on both sites including the booking procedure, staffing on site/call out arrangements during community hours, etc.
- School needs to generate a draft Community Sports Development Plan detailing potential usage at both sites based on interest shown to date
- Hours of use currently state - Page 4 Hours of Use 3.8 The proposed hours of use will be 7 – 9pm weekdays and 9am – 1.00 pm on Saturdays. There will be no use of Castlebar Field on a Sunday. In the event that a club wishes to use the facilities for training, they may be available from 6.30pm on some weekday evenings, to be agreed.

The Swyncombe Avenue Sports Ground hours of use need to be amended to allow for weekend (Saturday and Sunday) cricket matches in the summer and football/rugby matches in the winter, as well as midweek evening training sessions and cricket matches during summer and winter. The hours of use need to be expanded to: weekdays 6 – 9pm unless the school is using the facility until 7pm and weekends 9am – 6pm to allow for summer cricket matches which usually finish around 6pm and winter football matches which finish before dusk. As well as daytime use during school holidays.

Indoor facilities at the Castlebar site, should be available for community use year round weekdays 6 – 9pm unless the school is using the facility until 7pm and weekends (Saturdays and Sundays) 9am – 6pm as well as daytime use during school holidays. Outdoor facilities should be available for community use weekdays 6 – 9pm (or dusk if no floodlights are provided) unless the school is using the facility until 7pm and Saturdays and Sundays 9 – 1pm year round.

Additional comments:

- The indoor community use facilities at the Castlebar site should be designed in accordance with the relevant Sport England community use guidelines for badminton and other indoor sports as well as for the ancillary facilities that will be available for community use i.e. changing rooms and toilets
- The arrangements for community access to car parking needs to be confirmed at both sites
- Clear signage needs to be included to ensure community users have a safe and accessible route from the site entrance to the facilities to be used
- Note that the dining room will be cleared each day for community use to take place
- Note that storage will be available for community users of the Castlebar site
- Note community access by pre booking only
- Note pricing policy in line with similar facilities in the local area
- Note the interest already shown by local sports clubs

Have a good Easter break

Regards

EALING SPORTS AWARDS 2019

Sponsored by Everyone Active

Nominations open until 12 noon Wednesday 1st May 2019. Visit everyoneactive.com/EalingSportsAwards

From: [REDACTED]
Sent: 03 April 2019 14:51
To: [REDACTED]
Subject: 191182FUL - Durston House School

Good afternoon [REDACTED],

Just following up the notification from the Planning Support Team regarding this application for a circa 5,000 sq. m. school on playing field and Community Open Space and conversion of existing school properties into 17 residential units.

[REDACTED]. Ideally I would like to resolve any issues you might have with this application prior to my departure so that my colleague [REDACTED] won't have to take on too much extra work in my absence. Really appreciate anything you can do to expedite this application.

Of most relevance for yourself is the Proposed Community Use Agreement-Version-2, prepared by LUC, dated 16.01.19 (attached) and all other plans and documents are available online here: <https://pam.ealing.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=POEXTRJMMN200>

Kind regards,



Please consider the environment before printing this email.

The content of this email and any attachment transmitted within are

[REDACTED]

From: [REDACTED]
Sent: 10 December 2019 10:06
To: [REDACTED]
Subject: LPA Ref: 191182FUL - Durston House School Sports Ground.
Attachments: App Ref: 191182FUL Durston House School Sports Ground.

Dear [REDACTED]

Thank you for consulting Sport England on the additional information received, namely the documents titled Community Use Development Plan and Proposed Community Use Agreement.

Sport England welcome the intention to allow community use of the schools current and proposed facilities however Sport England do not consider that the documents submitted would ensure there would be secured community use of the facilities. The documents submitted are a plan and statement which can inform an agreement but is not a Community Use Agreement in itself. Sport England do recognise that the document titled 'Proposed Community Use Agreement' does state that a Community Use Agreement following Sport England's template would be completed. Normally Sport England seek the submission of a Community Use Agreement through a planning condition however it would have no concerns if it is secured through a s.106 as indicated in the documentation.

Notwithstanding the above, Sport England's position regarding the application remains as set out in its correspondence dated 24th April 2019 (attached for convenience).

If you have any questions or would like further advice please do not hesitate to contact me.

Kind Regards

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]



[REDACTED]

From: [REDACTED]
Sent: 23 July 2019 14:52
To: [REDACTED]
Subject: RE: App Ref: 191182FUL Durston House School Sports Ground.
Attachments: App Ref: 191182FUL Durston House School Sports Ground.

Our Ref: PA/19/L/EA/51953

Dear [REDACTED]

Thank you for forwarding the additional information received.

Sport England welcomes the intention to work with local clubs and the Council to facilitate community use of the school's current and proposed facilities. It is recommended that any community use of any of the sites are secured by a Community Use Agreement (CUA). A template CUA can be found on Sport England's website.

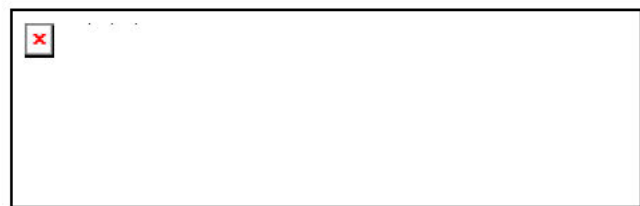
Notwithstanding the community use plans submitted, the proposal still results in a considerable loss of playing field and, especially in relation to the artificial surface, there does not appear to be a significant need that would be met by the scheme that would be of such a benefit to mitigate the playing field loss. Sport England are, therefore, unable to shift its position on the scheme consequently Sport England's comments as stated on email dated 24th April 2019 still applies (attached for convenience).

If you have any questions please do not hesitate to contact me.

Yours Sincerely

[REDACTED]

[REDACTED]



1st Floor, 21 Bloomsbury Street, London, WC1B 3HF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [REDACTED]

From: [REDACTED]
Sent: 10 July 2019 15:37
To: Planning South <Planning.South@sportengland.org>; Planning <Planning@ealing.gov.uk>
Subject: RE: App Ref: 191182FUL Durston House School Sports Ground.

Hi,

[REDACTED] for the application and am pleased to send you the revised proposed draft Community Use Agreement and Community Use Development Plan that the applicant submitted to the Council last month as requested for your review and comment. It has been submitted in response to the concerns expressed by Sport England, the GLA and LB Ealing officers to help mitigate the impact of the application proposal.

Both documents have been published on the Council's website for the application.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 10 July 2019 09:50
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: App Ref: 191182FUL Durston House School Sports Ground.

Hello,

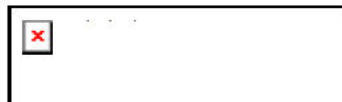
Please can we be sent a formal consultation the additional information that has been submitted online for this application?

Once the consultation has been received we will reply with 14 days.

With Regards,

[REDACTED]

[REDACTED]



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF



From: [REDACTED]
Sent: 04 July 2019 10:03
To: [REDACTED]
Subject: FW: App Ref: 191182FUL Durston House School Sports Ground.

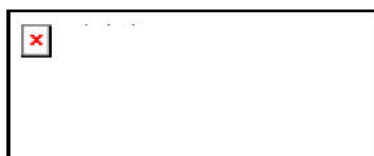
Hi,

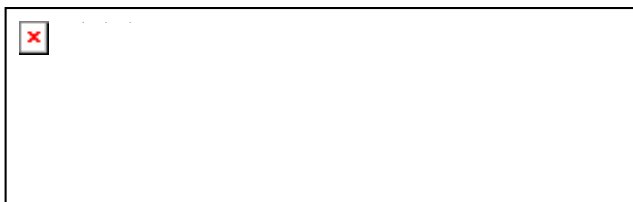
Below is an email from a planning consultant acting on behalf of local residents. Looks like additional information has been submitted to the Council which we have not been consulted on. Could you contact the Council and chase a re-consultation please?

Thanks

[REDACTED]

[REDACTED]





1st Floor, 21 Bloomsbury Street, London, WC1B 3HF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [REDACTED]

From: [REDACTED]
Sent: 03 July 2019 10:44
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: App Ref: 191182FUL Durston House School Sports Ground.

[REDACTED]

The attached documentation has now been submitted to the Council. I assume these have been sent to Sport England. They are obviously aimed at resolving your concerns.

I think it is important that the scale and extent of the mitigation is defined. There is to some extent an element of existing arrangements continuing. Both Hounslow and Ealing's Playing Pitch Strategies are relevant.

Is there anything you need ?

Thanks

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 21 May 2019 13:57
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: App Ref: 191182FUL Durston House School Sports Ground.

11/11/2016



From: [REDACTED]

Sent: 21 May 2019 10:32

To: [REDACTED]

Cc: [REDACTED]

Dear [REDACTED]

I have not seen any documentation since I submitted Sport England's comments therefore Sport England's positions is unchanged.

██████████
██████████



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [REDACTED]

From: [REDACTED]
Sent: 20 May 2019 12:15
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: App Ref: 191182FUL Durston House School Sports Ground.

[REDACTED]

I am helping the residents to object to the above proposal.

Attached are copies of the objections we have made. The GLA also now object.

I am finding it odd that Sport England's objection has not been published on the Council's website. I assume your position is unchanged ?

Thanks

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 14 May 2019 12:53
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: App Ref: 191182FUL Durston House School Sports Ground.

[REDACTED]

This objection seems to have been omitted from the Council's website. Can it be published ? Also, can all consultee comments be published ?

Thanks

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 24 April 2019 15:57
To: [REDACTED]
Subject: App Ref: 191182FUL Durston House School Sports Ground.

Our Ref: PA/19/L/EA/51953

Dear [REDACTED]

Thank you for consulting Sport England on the above application.

Sport England – Statutory Role and Policy

It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework (particularly Para 97) and Sport England's Playing Fields Policy, which is presented within its 'Playing Fields Policy and Guidance Document' found at www.sportengland.org/playingfieldspolicy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all/part of a playing field, unless one or more of the five exceptions stated in its policy apply.

The Proposal and Impact on Playing Field

The application proposes the construction of a school and change of use of buildings. In terms of sport facilities, the proposal would result in an extensive loss of playing field and loss of two floodlight tennis courts however an artificial surface and sports hall is proposed that would be available for community use.

Assessment against Sport England Policy/NPPF

The proposed hybrid sports hall could be considered to mitigate the loss of the tennis courts given that the hall would have markings for two tennis courts. This, though, would be on the basis that the flooring would be suitable for tennis and that there is community access to the facility outside school hours. Both of these matters could be the subject of planning conditions if the application were to be approved. The sports hall is unlikely to have any additional sporting benefits for the wider community given its limited size and lack of other sport court markings.

As noted above, the works would also result in a considerable loss of playing field due to the proposed buildings and artificial surface. Although the applicant has attempted to mitigate some of this loss with the provision of an artificial surface, limited details have been provided regarding the proposed surface and given its size and lack of floodlighting it would have limited benefits to sport compared to the larger, more flexible, playing field that is likely to be able to accommodate a range of sports. Furthermore, there does not appear to be need for an artificial surface in this location, from a community sport perspective, provided the actions in the Council's Playing Pitch Strategy are delivered. The artificial surface would also leave a limited sized area of natural turf playing field that is unlikely to be used for any formal sport.

In light of the above, Sport England are unable to consider that there are sufficient benefits to the proposal to outweigh the loss of playing field consequently the proposal would not meet any of the exceptions of its Playing Field Policy. Sport England, therefore, advise that the proposal is reconsidered by reducing the extent of playing field lost or providing a replacement playing field (or equivalent) elsewhere in the locality.

Conclusion

In light of the above, Sport England **objects** to the application because it is not considered to accord with any of the exceptions to Sport England's Playing Fields Policy or with Paragraph 97 of the NPPF.

Should the local planning authority be minded to grant planning permission for the proposal, contrary to Sport England's objection then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State, via the National Planning Casework Unit.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

If you would like any further information or advice please contact me at the address below

Yours sincerely

[Redacted signature]

[Redacted contact details]



1st Floor, 21 Bloomsbury Street, London, WC1B 3HF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Redacted email address]

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If

[REDACTED]

From: [REDACTED]
Sent: 10 December 2019 10:06
To: [REDACTED]
Subject: LPA Ref: 191182FUL - Durston House School Sports Ground.
Attachments: App Ref: 191182FUL Durston House School Sports Ground.

Dear [REDACTED]

Thank you for consulting Sport England on the additional information received, namely the documents titled Community Use Development Plan and Proposed Community Use Agreement.

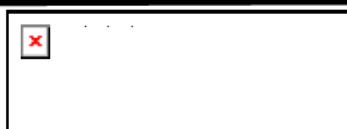
Sport England welcome the intention to allow community use of the schools current and proposed facilities however Sport England do not consider that the documents submitted would ensure there would be secured community use of the facilities. The documents submitted are a plan and statement which can inform an agreement but is not a Community Use Agreement in itself. Sport England do recognise that the document titled 'Proposed Community Use Agreement' does state that a Community Use Agreement following Sport England's template would be completed. Normally Sport England seek the submission of a Community Use Agreement through a planning condition however it would have no concerns if it is secured through a s.106 as indicated in the documentation.

Notwithstanding the above, Sport England's position regarding the application remains as set out in its correspondence dated 24th April 2019 (attached for convenience).

If you have any questions or would like further advice please do not hesitate to contact me.

Kind Regards

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



[REDACTED]

From: [REDACTED]
Sent: 08 June 2020 23:50
To: [REDACTED]
Subject: RE: Durston / GLA 4597

Hi [REDACTED]

I hope my email finds you well. I generally have good availability but don't have an update on our position from when we last spoke. We have been doing the typical series of briefings/work with the applicant and Council but the referral is not live yet.

I am anticipating the referral reasonably soon (although we don't have a programme for this yet). Given this it might be more useful to speak when we have a referral programmed unless there was something specific you wanted to clarify?

Sincerely

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](https://www.london.gov.uk)

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 June 2020 14:45
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Durston / GLA 4597

Heya,

Any chance for a quick catch up about this at some point this week?

From: [REDACTED]
Sent: 02 June 2020 20:59
To: [REDACTED]

[REDACTED]

Subject: FW: Durston / GLA 4597

Importance: High

Hi All,

We are all concerned about loss of Trees & Green open space in the Amazon , Africa & Asia. We & our politicians shout out about what these countries are doing & not protecting these spaces. However on our door step the GLA are making a decision on the last remaining green space & football pitches in our Ealing Ward. The world lost Green space the size of a football pitch every 6 seconds last year. Jules Pipe, Sadiq Kahn & [REDACTED] [REDACTED] have little influence & control over that but we know they would stop it if they could. Logic says the GLA will not remove these last 3 football pitches & essential Urban Green Space from the centre of Ealing in just a few seconds themselves.

Ealing planning department described these buildings as terraced in the planning meeting – they are detached.
Ealing planning department described these as next to residential buildings – two are next to Harvington Private Prep School

Ealing planning department described these as former residential building – 12/14 Castlebar was built & occupied as a school from 1886 & building 26 Castlebar was built & occupied in 1898 as a school

These are basics but [REDACTED] , Jules & Sadiq do not live in Ealing & may never have been to the location so will get their information from Ealing planning department and have a very difficult task trying to see through to the misinformation. If they can not rely on the planning department on these smaller issues then the bigger ones like Pollution , Traffic, Bio Diversity & Affordable housing, specific section 106 payments for Cycle lanes & Coach Bay (zero requested) . These need thorough examination & reference to our GLA representative, MP, Ward Councillors, Sports England & Residents representatives to check the true facts.

Our local MP , Rupa Huq has received an email from Ealing education department by way of a response to her query regarding school places , to say that there is an over supply of Primary School places in the borough & that this is likely to continue due to falling birth rate, the shortfall is in secondary places.

The removal of all the outdoor Sports facilities can never provide more useful available Community sports use. Sports England have explained that the removal of floodlight sports facilities & poor flooring will not make the indoor hall of much use. Unless the school are providing the equipment for all the clubs then there will be little use for example for the Table Tennis club. We can not expect individuals to bring their own Table Tennis tables. Community use in Hounslow can not be granted by Ealing planning department when Hounslow council & residents have already rejected it. The rejection on appeal is attached & are stronger today than when decided.

The Only request we have is simple , please stick to the London Plan , Local Plan , Sports England Advice, Ealing Playing Pitch Strategy report, Local MP advice, Local GLA representative advice, Local ward Councillors advice. In the meeting 7 councillors who attended were against (2 did not get a vote), 2 abstained , 5 voted for but was carried by the chair.

With Covid 19 fresh in everyone's minds it is important to note that not only will there be a massive loss to the pupils of outdoor playing space but the children will get less space in the classrooms than they currently have. Many class rooms will be bigger nut with 1o8 more pupils they will have less not more space & less social distancing.

Please may we meet so that we can put our case & you can question us on our facts.

The following photos/documents are attached:

- 1 Playing Pitch Strategy
- 2 School Playing Fields
- 3 Castlebar Fields Google Earth
- 4 Centre Of Ealing / Google Maps

- 5 Durston Presentation
- 6 Durston Swyncombe Hounslow Appeal
- 7 Durston / Harvington
- 8 Planning Officers Report
- 9 Key Questions for this development that were not answered

My Apologies that there is so much to digest at this very difficult time.

Regards,



This message has been scanned for viruses by the Greater London Authority.

Click [here](#) to report this email as spam.
