

GREATER LONDON AUTHORITY

[REDACTED]
(By email)

Our Ref: MGLA080119-2553

29 January 2019

Dear [REDACTED]

Thank you for your request for information which the GLA received on 8 January 2019. Your request has been dealt with under the Environment Information Regulations (EIR) 2004.

You asked for:

...copies of the formal and informal pre-application advice provided by the Planning Decisions Unit (and the associated information that they are based), that have been provided to the Durston House School regarding the proposed new school on this site

Please find attached the information we have identified as within scope of your request. Please note that some names of members of staff are exempt from disclosure under Regulation 13 (Personal information) of the EIR. This information could potentially identify specific employees and as such constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

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

Yours sincerely

Paul Robinson
Information Governance Officer

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

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

Durston House School

in the London Borough of Ealing

The proposal

Redevelopment of the Durston House Sports Ground to provide a part single, part two and part three-storey school building and associated landscaping works.

The applicant

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

Context

1 On 6 March 2018 a request was received for a pre-planning application meeting with the Greater London Authority on a proposal to develop the above site for the above uses. On 27 April 2018 a pre-planning application meeting was held at City Hall with the following attendees:

GLA group

- [REDACTED] (case officer);
- [REDACTED] (Principal Planner);
- [REDACTED] (Senior Planner - Design)
- [REDACTED] (TfL)

Applicant

- [REDACTED] (LUC – Planning Consultants)
- [REDACTED] ADP – Architects)
- [REDACTED] (Synergy – Project Managers)
- [REDACTED] (LUC – Landscape Architect)
- [REDACTED] (Durston House School)

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

Site description

3 The site 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 public access to the playing fields for members of the public.

Details of this proposal

4 Redevelopment of the Durston House Sports Ground to provide a part single, part two and part three-storey school building and associated landscaping works.

Strategic planning issues and relevant policies and guidance

5 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).

6 The following are relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance.
- Draft London Plan (consultation draft December 2017), which should be taken into account on the basis explained within the NPPF.

7 In addition, on 5 March 2018, the Government published the draft revised National Planning Policy Framework for consultation (until 10 May 2018). This should be taken into account appropriately in accordance with its early stage of preparation.

- Education *London Plan;*
- Open land *London Plan;*
- Playing fields *London Plan;*
- Urban design *London Plan;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM);*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Transport Functions SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy.*

Summary of meeting discussion

8 Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to education, playing fields, open space, sustainable development and transport. GLA officer advice in respect of these issues is set out within the sections that follow.

Principle of development

Education

9 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. The proposal for an additional 108 pupil places above those provided by the existing facility reflects identified local need arising from a shortfall in local provision and anticipated increased demand due to population growth. There was an identified shortfall of 3.5 primary forms of entry in 2016 and an expected shortfall of 19 secondary forms of entry by 2019 within Ealing. It is acknowledged that the provision of 108 additional pupil spaces would make a positive contribution to minimising this deficit.

Playing fields

10 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. The proposal would remove 1,140 sq.m of currently undeveloped land from the site. During the meeting it was outlined that 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 was confirmed that at present there is no public access to the site beyond this informal arrangement. GLA officers note that whilst there is a net reduction in playing field area (circa 1,140 sq.m) at the site this loss is mitigated and minimised through the provision of an indoor facility and other enhancements to the offer of the site including a formal community use strategy. The applicant outlined it is, in principle, agreeable to a community use agreement to allow members of the public access to the playing fields and associated school facilities. These measures would not only ensure that these proposals would not negatively impact on the use of the remaining playing fields, but would actively enhance the breadth of offer and experience of using these facilities. The community use agreement would also ensure the playing fields become more accessible to the public outside of school hours. These provisions should be finalised prior to the submission of a formal planning application and would need to be secured via S.106.

Open space

11 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. GLA officers note that through the Local Plan the site falls within an area of park deficiency. At application stage the applicant must demonstrate that the enhanced community access and increased quality of provision at the site sufficiently off-set the partial loss of (largely private) open space at this site. Further to the consideration above, GLA officers are of the view that such a case could be made.

Urban design

12 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-stories 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.

13 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.

Inclusive access

14 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. It is understood that the proposals are being developed to ensure that the school would be fully accessible. This is supported, and details of layouts, gradients and access routes should be clearly set out within the design and access statement.

Sustainable development

15 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); potential connection to a district heat network; and, renewable technologies. Whilst the principles of the energy strategy are supported, the applicant must explore the potential for additional measures to deliver further carbon dioxide reductions. A full technical note has been produced in respect of the above issues which has been forwarded to the Agent.

Transport

Transport assessment

16 A Transport Assessment (TA) is to be submitted alongside the planning application submission, which will consider the impact of the development on all modes of transport at both the occupation and construction phases. TfL's guidance on TAs can be found at the following webpage: <https://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessment-introduction>

Vehicle parking

17 Beyond one blue badge parking bay, no general car parking provision is made, given the site enjoys an excellent public transport access level (PTAL) of 6a on a scale of 0 to 6b this is supported.

Cycle parking

18 The proposal to provide 31 cycle parking spaces falls significantly below London Plan and draft London Plan cycle parking standards. In order to meet the minimum requirements for the London Plan and draft London Plan a minimum of 61 long stay and 4 visitors spaces would be required based on 400 pupils and 90 staff members. The quantum of cycle parking provision must be addressed prior to the submission of a formal planning application and must be designed in accordance with the London Cycle Design Standards (LCDS).

Walking and cycling

19 Draft London Plan Policy T2 seeks to promote healthy streets, accordingly, the applicant is expected to demonstrate how as part of the TA, active travel will be promoted.

Access and servicing

20 All servicing activities on site must be regulated by a Delivery & Servicing Plan (DSP), with service access to the site restricted to outside of school hours, adequate measures must be provided to prevent conflicts between servicing vehicles and pupils/staff/visitors of the school. At application stage a road safety audit must be provided.

Public transport and highway impact

21 As the proposal would be car free with the exception of blue badge parking, the impact on the local highway network/ SRN/ TLRN are unlikely to be significant. However, Ealing Council must investigate measure to reduce the number of school run vehicle trips.

Travel plan

22 The commitment to provide a School Travel Plan for the proposal is welcomed. The Travel Plan must be STAR accredited. 60% of pupils are currently driven to school by private cars, this must be significantly reduced with mode shifts to sustainable modes of transport. The Travel Plan must therefore include robust targets and measures to instigate such behaviour changes.

Construction logistics

23 The planning application submission should also include a framework Delivery & Servicing Plan (DSP) and a Framework Construction Logistics Plan (CLP) that outlines the provision for servicing, and construction logistics. The CLP should be produced in accordance with TfL's latest guidance: <http://content.tfl.gov.uk/construction-logistics-plan-guidance.pdf>.

24 The site is in vicinity of Network Rail land and the applicant has also advised London Underground equipment is located within the site's vicinity; therefore, the applicant shall liaise with both Network Rail and London Underground Limited on infrastructure protection matters ensuring no adverse impact will be caused to rail services/ infrastructure in the area.

Conclusion

25 Early engagement by the applicant is strongly supported, and 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. The design of the scheme is strongly supported and would provide for a high-quality addition to the streetscape. The applicant should also have regard to the detailed advice set out in this report with respect to transport and sustainable development. Further engagement from the applicant with Ealing Council officers and the GLA is encouraged prior to the submission of any future planning application to ensure the outstanding issues are appropriately addressed.

for further information, contact GLA Planning Unit (Development & Projects Team):

Juliemma McLoughlin, Chief Planner

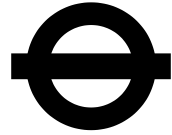
[REDACTED]

[REDACTED], **Principal Planner**

[REDACTED]

[REDACTED], **Case Officer**

[REDACTED]



To: [REDACTED], GLA

From: [REDACTED], TfL

Your
ref: [REDACTED]

Phone: [REDACTED]

Date: 21 June 2018

Durston School LB Ealing, – GLA pre-application TfL comments.

The following comments summarise Transport for London's (TfL) views on the proposed development. Please note that these comments represent the views of TfL officers and are made entirely on a "without prejudice" basis.

The proposals seek to consolidate the 3 school sites to a single location which is present occupied by the school's playing fields. Currently PE and training are currently done on site, but actual games take place on the schools playing fields at Swyncombe. The applicant is intended that the new school to include capacity for growth to contribute to addressing the need for school places in the area, rather than immediately having an increase in pupil numbers upon opening. However, the increase in number of pupils and staff has yet been confirmed at this stage.

Transport Assessment

A Transport Assessment (TA) is to be submitted alongside the planning application submission, which will consider the impact of the development on all modes of transport at both the occupation and construction phases. TfL's guidance on TAs can be found at the following webpage: <https://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessment-introduction>.

Vehicle Parking

TfL supports that no general car parking would be provided except one blue badge parking bays; as the site enjoys an excellent public transport access level (PTAL) of 6a. .

Cycle Parking

The proposal to provide 31 cycle parking spaces falls well below the current London Plan and Draft London Plan cycle parking standards. To meet the minimum requirements for both of the current and Draft London Plan standards; a minimum of

61 long stay and 4 visitors spaces would be required based on 400 pupils and 90 staff members. Therefore the applicant shall provide additional facilities to meet these standards. It also advises the facilities shall be designed in accordance with the London Cycle Design Standards (LCDS). Cycle access to the storage area should be safe and convenient. A minimum of 5% of the cycle parking spaces should be provided for larger bikes for disabled users. Shower and changing facilities should also be provided.

Walking & Cycling

In order to meet the Mayor's aspiration to create Healthy Streets for London, as set out in 2018 Mayors Transport Strategy and draft London Plan Policy T2, the applicant is expected to demonstrate as part of the TA active travel will be promoted. The design of public realm in the proposal should be assessed against the Healthy Street principals set out in the MTS.

TfL also expects that PERS/ CLOS assessment will be carried to routes to local amenities and public transport interchange to identify local walking/ cycle improvement needs.

Access and Servicing

It is expected servicing will take place from the school ground; therefore TfL requests that all servicing activities on site would be regulated by a Delivery & Servicing Plan (DSP), which service access to the site would be restricted outside the school starting and finishing time of day, and adequate measure shall be provided to prevent conflicts between servicing vehicles and pupils/ staff/ visitors within the school.

It is recommended that a Stage 1 Road Safety Audit of the vehicular access arrangements should be carried out.

Public Transport

The proposed development site has an excellent PTAL of 6a, which large number of bus routes serve bus stops in Ealing town centre within acceptable walking distance. However, TfL would only able to confirm whether there will be material impact to local bus services after the applicant has confirmed the future full capacity of the school with future number of pupils and staff.

Highway Impact

As the proposal would be largely car free with the exception of blue badge parking, based on the information provided to-date, TfL considers that the impact on the local highway network/ SRN/ TLRN are unlikely to be significant. However, Ealing Council shall investigate measure to reduce the number of school run vehicle trips for the proposed school to improve local traffic condition/ reduce pollution.

Travel Plan

The commitment to provide a School Travel Plan for the proposal is welcomed. Such Travel Plan should be STAR accredited and be secured by appropriate condition/ planning obligation. TfL notes that over 60% of pupils are currently driver to school by private cars, this need to be significantly reduced with mode shift to sustainable

modes of transport such as walking and cycling, the Travel Plan shall therefore include robust targets and measures to instigate such behaviour change accordingly.

Construction Logistics Plan (CLP)

The planning application submission should also include a framework Delivery & Servicing Plan (DSP) and a Framework Construction Logistics Plan (CLP) that outlines the provision for servicing, and construction logistics. The CLP should be produced in accordance with TfL's latest guidance: <http://content.tfl.gov.uk/construction-logistics-plan-guidance.pdf>.

It is understood that the site is in vicinity of Network Rail land and the applicant has also advised London Underground equipment is located within the site's vicinity; therefore the applicant shall liaise with both Network Rail and London Underground Limited on infrastructure protection matters ensuring no adverse impact will be caused to rail services/ infrastructure in the area.

Mayor Community Infrastructure Levy (CIL)

As the proposal is for an educational establishment, therefore the proposal would not be subject to Mayor CIL payment.

Kind regards


Planner - TfL City Planning
Email: 

Energy comments

- The energy assessment planning guidance is available on the GLA website (March 2016). This provides further information on the revised targets to take into account Part L 2013 of the Building Regulations. It also provides details on the information that should be submitted within the energy statement to be submitted at stage 1. See link for the latest guidance published in March 2016: <https://www.london.gov.uk/WHAT-WE-DO/PLANNING/PLANNING-APPLICATIONS-AND-DECISIONS/PRE-PLANNING-APPLICATION-MEETING-SERVICE-0>
- The following targets are in effect for all Stage 1 schemes received by the Mayor from 1 October 2016 onwards, as set out in the revised energy assessment guidance:
 - Residential developments – Zero carbon (as defined in section 5.2 of the Housing SPG) against Part L 2013
 - Commercial/Non-domestic – 35% below Part L 2013
- The carbon emission figures should be reported against a Part L 2013 baseline. The applicant should commit to meeting Part L 2013 by efficiency measures alone. The BRUKL sheet including efficiency measures alone should be provided to support the savings claimed.
- Evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with Policy 5.9. Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 should be undertaken. An area weighted average for the actual and notion cooling demand should be provided and the applicant should demonstrate that the actual building's cooling demand is lower than the notional (MJ/m2).
- The applicant has investigated opportunities for connection to nearby district heating networks and has identified a proposed network at a distance of circa 500m. Evidence of communication with the local authority energy officers should be provided on the anticipated plans and timeframes of the network.
- The site should be served by a single energy centre and the applicant should commit to providing a site wide heating network suitable for connection to wider district networks now or in the future. All uses on the site should be connected to the communal heat network. A drawing/schematic indicating that all uses are connected to the communal network should be provided.
- A plan showing the size, internal layout and proposed location of the energy centre should be provided.
- The applicant has undertaken a full feasibility analysis for all renewable technologies for the site and is proposing Photovoltaic (PV) panels and Ground Source Heat Pumps (GSHPs). Detailed information on the assumptions and calculations associated with both technologies should be submitted.
- A plan showing the proposed location of the solar PV installation should be provided. The applicant should additionally demonstrate that the site's full potential for a solar PV array has been maximised.
- Air Quality should be considered if any air quality sensitive technologies are considered; an Air Quality assessment should also be submitted and the energy assessment should confirm

that the NOx emission standards set out in the SPG on Sustainable Design and Construction will be met.