### Sutcliffe Park, Eltham
#### in the Royal Borough of Greenwich
planning application no.14/0287/O

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<th>Strategic planning application stage II referral</th>
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<td>Outline planning permission (access, layout and scale) for the construction of a new indoor Multi-Sports Centre in association with the existing sports/recreational facilities including associated public realm and highway improvements.</td>
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<th>The applicant</th>
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<td>The applicant is the Royal Borough of Greenwich, and the architect is HTP Architecture.</td>
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<th>Strategic issues</th>
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<td>Outstanding issues in relation to inclusive design and transport are resolved satisfactorily.</td>
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<th>The Council’s decision</th>
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<td>In this instance the Royal Borough of Greenwich has resolved to grant permission.</td>
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<th>Recommendation</th>
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<td>That the Royal Borough of Greenwich be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal.</td>
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### Context

1. On 14 March 2014 the Mayor of London received documents from the Royal Borough of Greenwich notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under Category 3D of the Schedule of the Order 2008: “Development – (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floor space of more than 1000 square metres or a material change in the use of such building.”

2. On 24 April 2014 the Deputy Mayor and Chief of Staff, acting under delegated authority, considered planning report D&P/3391/01, and subsequently advised the Royal Borough of Greenwich that the application did not comply with the London Plan, for the reasons set out in paragraph 29 of the above-mentioned report; but that the possible remedies set out in that paragraph of the report could address these deficiencies.
3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised in response to the Mayor’s concerns (see below). On 9 May 2014 the Royal Borough of Greenwich decided that it was minded to grant planning permission, for the revised application, and on 3 July 2014 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged or direct Council under Article 6 to refuse the application. The Mayor has until 16 July 2014 to notify the Council of his decision and to issue any direction.

4 The decision on this case and the reasons will be made available on the GLA’s website www.london.gov.uk.

Update

5 At the consultation stage the Royal Borough of Greenwich was advised that the application did not comply with the London Plan, for the reasons set out in paragraph 29 of the above-mentioned report; but that the possible remedies set out in that paragraph of the report could address these deficiencies:

- **MOL and sports facilities:** The proposed development is an inappropriate use on MOL. However, the enhancement of sport facilities on site is strongly supported and on balance exceptional circumstances are considered to exist that justify the use.

- **Urban Design:** There are no strategic issues. However, the Council is encouraged to ensure that the proposed materials and detailing that form part of a full planning application (at a later stage) are secured to safeguard the visual quality of the park and surrounding context.

- **Inclusive design:** Little information has been provided to demonstrate best practice. The applicant should engage with specific disability groups to ensure the building is fully inclusive.

- **Transport:** TfL has raised concerns particularly in regard to the provision of safe vehicle access to the site, especially for large vehicles such as coaches. The applicant is required to address the concerns before the scheme is referred back to the Mayor.

6 **MOL and urban design:** It is noted that the proposed development would result in the loss of approximately 22 trees, all directly to the south-west of the tracks, and that there are large mature trees on the Kidbrooke Park Road frontage which obscure many of these low priority trees. A large number of these trees along the west and southern boundary of the site would be retained for screening. The trees to be removed in order to create the new access onto the site are of low and poor quality and as such, their removal would have a limited impact on the area in general.

7 Notwithstanding the above, a landscape design, as conditioned in the draft decision notice will be delivered that will include ground modelling, replacement and additional tree and shrub planting to complement the ecological biodiversity and habitat of the park.

8 **Inclusive design:** The applicant has provided further information in regard to inclusive design. The additional design statement confirmed that the building is being designed to meet the requirements of Sport England’s Design Guidance for Access for Disabled People. The intention is to provide people with disabilities full access to all the sporting facilities both in the new and existing buildings.

9 The applicant has confirmed that it will consult UK Athletics Facilities Managers throughout the design process and ensure that the views of end users, athletes and their coaches are considered. Sport England has supported the scheme. An informative recommending the detailed design accord with Sport England’s design guidance has been appended in the draft decision notice.

10 As a result, the proposal is compliant with inclusive design policies of the London Plan.

**Transport for London’s comments**
11 The site is adjacent to the Transport for London Road Network (TLRN) – Eltham Road and Kidbrooke Park Road which are both part of the Red Route network. At Stage 1, TfL raised a number of transport concerns including the need to provide a safe access. The detailed design, including final detail on the access, height, bulk and finishing materials, of the building will be reserved for future approval.

12 TfL expects to be consulted on the Reserved Matters Application related to access and how it relates to internal vehicle circulation. TfL believes a suitable access design can be prepared subject to further design work, swept path analysis, and Road Safety Audit. All works on the TLRN will require TfL’s explicit agreement under Section 278 of the Highways Act 1980 (as amended).

13 TfL has engaged in positive on-going discussions with the Transport Consultant in order to resolve outstanding highways matters. During the course of negotiations, the applicant has confirmed that the access matters are to be reserved for future consideration. Therefore the issues raised will be resolved at a later, detailed stage of the project. Transport for London raises no objection to this approach.

Response to consultation

14 A public consultation was undertaken which included statutory bodies and local residents, together with 148 individual letters of notification being sent to surrounding occupiers, as well as press and site notices advertising the application as a departure from the UDP were also published.

15 It is noted that a total of 117 letters in support were received and a total of 119 letters of objection have been received in response to the public consultation. The relevant grounds of objection are summarised as loss of MOL, inappropriate land use, massing, layout and scale, access and highways, and loss of trees.

16 Residents and amenity societies response: The responses received following these consultation exercises are indicated below:

- **Councillor Drury**: The Councillor has stated that the core of the objection is that there should be no more green space (MOL) lost to buildings across this Borough, and that the existing facilities for athletics within Sutcliffe Park should be improved without loss of green space.

- **The Blackheath Society**: Objected to the proposal on the grounds that this application should be considered in relation to recently announced proposals by Berkley Homes to increase their offer of 4,000 new homes at Kidbrooke to in excess of 5,000 new homes a major part of which will be families with young children resulting in pressure on the presently allocated communal open space, a large swathe of open land devoted to car and coach parking, traffic congestion, lack of essential facilities such as cafe and public toilet provision for users of the whole Sutcliffe Park, the proposal introduces an alien feature into this area of MOL and has potential for significantly reducing wildlife habitats, and suggested an alternative location to be sought elsewhere in the south of the borough where development would not be so compromised.

- **The Friends of Sutcliffe Park (FOSP)**: Objected to the proposal on the grounds that the application fails the group’s constitution which is to protect and improve the park both ecologically, environmentally and for the safe enjoyment of all park users of all ages and ethnicity. The group also stated that the proposed building does nothing to enhance the park, the car park is totally unsuitable as it will destroy a large area of the nature reserve, mature trees and have a serious effect on the flora and fauna, major traffic disruption at an already busy major junction, with the proposed increase in density at Kidbrooke development recently announced open space is even important, although the group fully understands the need for additional sporting facilities but this is the wrong place. In addition an online petition organised by the chair Mr John Briggs that received 215 signatures.

- **The Greenwich Parks Forum (GPF)**: The Forum represents 25 Friends of Parks groups which seek to work with the Council in protecting the much valued parks and open spaces. The Forum pointed out that if this application is successful, it constitutes yet another incursion
into a park or open space in a sequence of Council decisions, which has resulted in an accumulating depletion of our open spaces. The Forum hopes therefore that the Council will give serious examination to this application, both by rigorously appraising its Environmental Impact and its implications for park users who cannot afford to use a multi-sports centre, and not least by searching for other sites, where this facility could be built. If it is decided to proceed, then the Forum hope the Council will find some way of compensating for the loss of open space and mitigating its impact on the use of Sutcliffe Park as an open space accessible open space. At the very least, the Planning Board could put a condition on this scheme that no further additions are made to this centre in the future and no further developments are allowed.

- The Eltham Society: Objected the proposals on the following grounds; the proposed development would substantially exceed the ratio of build and associated hard surface permitted for MOL, there is no obvious relationship between the proposed indoor sport centre and the existing outdoor athletics track, the labelling of the proposed toilets ‘for public use’ is misleading as they would only be available to those attending the centre and the track. The Society believes that such toilets should be available to all users of the park. Although there would be some replacement, the removal of mature trees and the erection of this large building would destroy the continuity of the green space.

- OneSpace Community Centre, Kidbrooke: The Director objected the scheme on the grounds of lack of consultation and has asked that this application to be put on hold for further discussion to take place and for more options to be considered.

- Courtlands Estate Residents: Objected the proposal on the following grounds; on the need of the new sports centre as there are many a short distance away, the addition of a car park for around 75 cars exacerbate the pollution level, the congestion and noise. It would be a matter of concern that the proposed Athletic Centre is to be placed so near to a children’s playground, and the felling of so many trees is unacceptable.

17 Statutory consultees: The responses received following these consultation exercises are indicated below:

- Sport England: As the development is for the provision of outdoor sports facilities and the provision of which would be sufficient benefit to the development of sport, the proposal is considered to meet the exception of policy E5. This being the case, Sport England supports the scheme and does not wish to raise an objection to this application.

- Environment Agency: No objection provided the suggested conditions are imposed. The conditions requested are appended by way of appropriately worded condition and informative.

- Natural England: Commented that the advice provided in their response applies equally to this amendment although they made no objection to the original proposal. The stated that the proposed amendments to the original application relate largely to access, and are unlikely to have significantly different impacts on the natural environment than the original proposal.

18 Correspondence with the Mayor: Three letters of objections from residents and societies (including FOSP’s chair Mr John Briggs) were sent directly to the Mayor stating that the proposal has caused huge local resentment and urging him to refuse the planning application.

19 In the letters of objection in particular from the chair of FOSP, it is stated that Royal Greenwich has approved this proposal based on seriously flawed officer reports and without proper regard for correct procedure. A further indication that the Council is promoting this scheme without due regard for process is that no mention was made of the scheme, notwithstanding its sub-regional significance, during the recent EIP on the Core Strategy. The Royal Borough having acted without proper regard for either procedure or fact, we now look to you to safeguard the integrity of the decision-making process.
20 In the letter of objection from the chair of FOSP, it is stated; ‘in your Stage 1 opinion, prepared as I understand it by GLA officers on your behalf, it is correctly identified that the proposal is an inappropriate form on MOL. But it is incorrectly asserted that special circumstances apply to justify the loss of MOL and the harm to the abutting MOL. The assertion is incorrect for 2 clear and indisputable reasons:

- First, that there is nothing in the applicant’s submitted documents which even discuss, let alone establish, any functional inter-dependence between the existing outdoor running track and the proposed indoor facilities. The synergy referred to by your officials is entirely a product of their own imaginations, without any evidential foundation. More on this below.
- Second, that the applicant has made no investigation of any kind into alternative locations. It follows ineluctably that no-one, including your officials, is able to assess what detriment would be suffered by locating outside Sutcliffe Park, and thus no-one can have any logical basis for saying that the detriment is so special as to justify breaching MOL policy.’

21 The letter above concludes by stating; ‘we consider it is nothing less than a complete disgrace that the Royal Borough and GLA officials should contemplate building on MOL without any consideration of alternative sites. This letter therefore asks you to revise your Stage 1 opinion, and take into account the true facts of the case in forming your Stage 2 opinion.’

22 Taking the grounds of objections in turn, it is considered that special circumstances do exist within the context of Paragraph 74 of the NPPF. It states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless, the development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss. The proposals provide such alternative facilities and are consistent with Policy 3.19 ‘Sports facilities’ of the London Plan and also policies 3.1 and 3.2.

23 The need for the proposed indoor sports centre on the site is established in the ‘Needs Assessment prepared by Continuum Sport and Leisure’ (Nov, 2013) report accompanied with the planning application.

24 In regard to the functional inter-dependence, based on officer’s experience of similar proposals, it is apparent that there is an inherent synergy between the indoor and outdoor sports facilities. The applicant has pointed out this relationship in its design and access statement section 2.2 stating that the two facilities complement each other.

25 Furthermore, in the needs assessment report, it is pointed out that there are a number of new all-weather sports facilities which will be offered at the site, some of which cater to the existing club and athletes using the track such as: 90 metre sprint track plus run off, full jumps provision, indoor throwing cage and netting accommodating, discus, hammer, javelin and shot put, heavy weights training areas, and community gym with a range of cardiovascular equipment (which can support body conditioning to the athletes using both the indoor and outdoor sports facilities).

26 In summary, concerns raised have been addressed in this and the stage 1 report of the GLA, and the Council’s committee report.

**Legal considerations**

27 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice.
Financial considerations

28 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government Planning Practice Guidance emphasises that parties usually pay their own expenses arising from an appeal.

29 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal and this unreasonable behaviour has directly caused another party to incur unnecessary or wasted expense. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

30 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the Council to do so) and determining any approval of details (unless the Council agrees to do so).

Conclusion

31 The outstanding issues have been resolved. The proposed development is supported in terms of good strategic planning in Greater London.

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Sutcliffe Park, Eltham

in the Royal Borough of Greenwich

planning application no. 14/0287/O

S strategic planning application stage 1 referral


The proposal

Outline planning permission (access, layout and scale) for the construction of a new indoor Multi-Sports Centre in association with the existing sports /recreational facilities including associated public realm and highway improvements.

The applicant

The applicant is **the Royal Borough of Greenwich**, and the architect is **HTP Architecture**.

Strategic issues

**Principle of land use, Metropolitan Open Land, Open Space**, provision of **sport facilities**, **urban design**, **inclusive design** and **transport** are the most relevant strategic issues for this scheme.

Recommendation

That the Royal Borough of Greenwich be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 29 of this report; but that the possible remedies set out in that paragraph of the report could address these deficiencies.

Context

1. On 14 March 2014 the Mayor of London received documents from the Royal Borough of Greenwich notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 24 April 2014 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2. The application is referable under Category 3D of the Schedule of the Order 2008: “Development – (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floor space of more than 1000 square metres or a material change in the use of such building.”

3. Once the Royal Borough of Greenwich 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 does resolve 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 application site known as Sutcliffe Park Athletic Track is located on the western boundary of Sutcliffe Park where Kidbrooke Park Road meets Eltham Road, it has a range of outdoor athletics facilities. The site of the proposed building is currently laid to grass and trees. As shown below, the site is close to the Kidbrooke Village Development that will provide 4,800 homes to the immediate north and east of the park.

6 The site is designated as an open space, local nature reserve, a Site of Borough Importance for Nature Conservation and comprises Metropolitan Open Land on the corner of Kidbrooke Road and Eltham Road.

![Aerial Photograph – Location of Sutcliffe Park in relation to Kidbrooke Village Development](image)

Details of the proposal

7 The application seeks an outline planning permission (access, layout and scale) for the construction of a new indoor Multi-Sports Centre in association with the existing sports /recreational facilities including associated public realm and highway improvements. The development will provide a range of indoor and outdoor facilities including a 90m indoor sprint track, full jumps provision, indoor throwing cage, regional boxing centre, heavy training weights area, community gym, indoor cricket nets, cafe and public toilets,

Case history

8 There is no recent planning history relevant to the current application.

Strategic planning issues and relevant policies and guidance

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

- Metropolitan Open Land: London Plan
- Sport facilities: London Plan
- Urban design: London Plan
- Access: London Plan; Accessible London: achieving an inclusive environment SPG
- Transport: London Plan; the Mayor’s Transport Strategy;
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 ‘saved policies’ of the 2006 Royal Borough of

The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning
  Policy Framework.
- Royal Greenwich Core Strategy with Development Management Policies - (Submission
  Version with proposed modifications).
- The draft Further Alterations to the London Plan (January 2014).

**Principle of land use: Metropolitan Open Land and sports facilities**

The application site is designated as a Metropolitan Open Land (MOL) and a Local
Ecologically Valuable Site. The protection and enhancement of MOL is set out under the London
Plan policy 7.17, the NPPF and the Council’s Local Plan Policy SP13.

The NPPF supports beneficial uses of the Green Belt, including outdoor sport and
recreation (Para. 81). Para. 89 of the NPPF states, “A local planning authority should regard the
construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

- Provision of appropriate facilities for outdoor sport, outdoor recreation and for
cemeteries, as long as it preserves the openness of the Green Belt and does not conflict
with the purposes of including land within it”.

The provision of indoor sports facilities on MOL is an inappropriate use and would need
exceptional circumstances to justify that use. In this circumstance, although the facilities are
primarily for indoor sport there is a very strong functional relationship with the associated outdoor
athletics facilities. The presence of both elements will provide opportunities for synergies between
the two and help sustain the outdoor element through greater use and interest. The scheme is
supported strongly as they promote the Mayor’s Sports Legacy Plan enhancing the provision of
sports and recreation facilities, and are consistent with Policy 3.19 ‘Sports facilities’ of the London
Plan.

In summary, whilst the development is an inappropriate use on MOL very special
circumstances are considered to exist to justify the scheme as discussed above. Furthermore the
low profile design of the building will ensure that visual impact is kept to a minimum.

**Urban design**

The proposed scheme is a linear part one part two storey building, designed to
accommodate a range of athletics activities which will enable the host club, Cambridge Harriers to
achieve Level 3 status as recognised by UK Athletics.
17 The proposed building is located at the south-west corner of the site, allowing for a primary vehicular entrance and parking area off Kidbrooke Park Road and a secondary pedestrian and cycle access point off Eltham Road, while protecting the openness of the remainder of the park to the north-east of the site. A combination of earth modelling and tree cover mediates the impact of the development on neighbouring housing as well as the general feeling of open green space in the immediate area. The building forms a strong spatial relationship with the existing athletics track and associated outdoor facilities both in terms of its orientation alongside the running track and through the provision of a spectators/viewing area along its east elevation. The siting and orientation of the building is therefore supported.

18 The building layout consists of the main rectilinear sports centre which has been designed using an efficient means of spatial programming, defined by the dimensions of the indoor running track with other facilities positioned along its length. The smaller ancillary wing is angled to form a sense of enclosure to the track whilst also containing the main entrance and reception area to the building. It also defines a pocket public space at its southern end which can act as a point of transfer between the sports facility, Eltham Road entrance and wider park. This is welcomed.

19 The form and massing of the proposal raises no strategic issues as a result of its location at the edge of the park and its relatively simple, low-rise and refined appearance. The Council is however encouraged to ensure that the proposed materials and detailing that form part of a full planning application are controlled by relevant planning conditions to safeguard the visual quality of the park and surrounding context.

Inclusive design

20 Policy 7.2 requires all new developments to achieve the highest standard of accessible and inclusive design and policy 2.4 seeks to develop a viable and sustainable legacy for the Olympic and Paralympic games. The applicant’s design and access statement provides a very limited commentary on access, referring to the London Plan, key Greenwich policies and main Acts. These are very generic and would not necessarily lead to an inclusive design that responded specifically to the needs of disabled sports users. The applicant should engage with relevant disability groups and advisors to ensure that the building design is fully inclusive.

Transport for London’s Comments

21 The site is adjacent to the Transport for London Road Network (TLRN) – Eltham Road and Kidbrooke Park Road which are both part of the Red Route network. TfL objected on 6 March 2014 to original planning application due to lack of supporting information. The applicant has provided further information. There are a number of transport concerns that should be resolved.

22 The main concern is that the applicant needs to provide safe vehicle access to the site, especially for large vehicles such as coaches. The access information that has so far been provided to TfL does not demonstrate that a safe access will be provided. The site has a long perimeter with roads mentioned above and there is a potential solution with one-way access for large vehicles and local highway changes to the TLRN.

23 The applicant has confirmed that it will not undertake a Road Safety Audit as part of their planning submission – 13 March 2014 email and again 26 March 2014. Swept paths drawings were provided for heavy goods vehicle on 26 March 2014 – but not for coaches and the former is not complete information and shows the vehicle over sailing the footway. A coach (which are of similar length) though not articulated would be more of a hazard to road users.

24 The applicant has asked for TfL to withdraw its objection on the basis that the access issue can be resolved at a later stage as a reserved planning matter application. However, from TfL’s perspective it would be better if the layout and access issues resolved together.

25 In summary, TfL cannot agree to the proposed vehicle access arrangements without changes to the proposed access design, further swept path analysis and Road Safety Audit.
Therefore, TfL’s advice is before the location of access points and their design is fixed by the Council that TfL approval should be obtained. All works on the TLRN will require TfL’s explicit agreement under Section 278 of the Highways Act 1980 (as amended).

Local planning authority’s position
26 The Royal Borough of Greenwich planning officers have yet to confirm their position.

Legal considerations
27 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
28 There are no financial considerations at this stage.

Conclusion
29 London Plan policies on principle of land use, MOL, provision of sports facilities, urban design, inclusive design and transport are the most relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **MOL and sports facilities:** The proposed development is an inappropriate use on MOL. However, the enhancement of sport facilities on site is strongly supported and on balance exceptional circumstances are considered to exist that justify the use.

- **Urban Design:** There are no strategic issues. However, the Council is encouraged to ensure that the proposed materials and detailing that form part of a full planning application are secured to safeguard the visual quality of the park and surrounding context.

- **Inclusive design:** Little information has been provided to demonstrate best practice. The applicant should engage with specific disability groups to ensure the building is fully inclusive.

- **Transport:** TfL has raised concerns particularly in regard to the provision of safe vehicle access to the site, especially for large vehicles such as coaches. The applicant is required to address the concerns before the scheme is referred back to the Mayor.

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