

Dormers Wells High School

in the London Borough of Ealing

planning application no. P/2010/1761

Strategic planning application stage 1 referral (new powers)

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

The proposal

Full planning permission for the demolition of the existing Dormer Wells School buildings and the construction of a new school building with a single storey storage building, a greenhouse and polytunnel on the northern part of the site. New playing fields would be created on the southern part of the site to replace the developed playing fields and the existing multi-use game area would be retained. 86 car parking spaces, including nine disabled spaces, 150 cycle parking spaces, and associated landscaping.

The applicant

The applicant is Balfour Beatty Education, and the architect is Nicholas Hare Architects.

Strategic issues

The principle of the development is supported as the proposed development will result in a high quality **educational facility** and an increase of **recreational open space**.

Further information is required however, regarding **urban design, access, climate change mitigation and adaptation, air quality and transport**.

Recommendation

That Ealing Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 72 of this report; but that the possible remedies set out in paragraph 73 of this report could address these deficiencies. The application does not need to be referred back to the Mayor if Ealing Council resolve to refuse permission, but it must be referred back if the Council resolve to grant permission.

Context

1 On 15 May 2010 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 has until 30 June 2010 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 3C of the Schedule to the Order 2008: *"Development which is likely to prejudice the use as a playing field of more than 2 hectares of land which... has at any time in the five years before the making of the application been used as a playing field"*

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.

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 4.2 hectare site, is located 1.5 kilometres northeast of Southall town centre. It is a backland site surrounded predominately by one to three-storey residential development. To the northwest of the site is Allenby Primary School and Dormer Wells Leisure Centre is to the southeast.

6 The site is currently occupied by Dormers Wells High School, a comprehensive school with 1100 pupils aged between 11-19 years old. The two-storey school buildings are located at the southern end of the site, with a hard surfaced multi-use games area behind the school. The rest of the site is playing fields. 76 car parking spaces are located along the southern boundary of the site, in front of the school.

7 Vehicular access to the site is via Dormers Wells Lane which connects to Uxbridge Road (A4020) approximately 600 metres south of the site which is part of the Strategic Road Network. There are no underground or rail stations within walking distance of the site but it is served by three bus routes. The public transport accessibility level of the site is 2 (on a scale of 1-6 with 6 being the highest level).

The proposed site



Source: Google maps

Details of the proposal

8 The applicant is seeking full planning permission for the demolition of the existing Dormer Wells School buildings and the construction of a new school building, a single storey storage building, a greenhouse and a polytunnel on the northern part of the site. New playing fields would be created on the southern part of the site to replace the developed playing fields and the existing multi-use game area would be retained.

9 The proposed school building is a figure of eight configuration with three wings on the east side and two internal courtyards. The building varies between one and three storeys in height, with the tallest element to the east of the building. The proposal will result in an increase in student capacity from 1100 to 1415. Whilst, vehicular access arrangements will remain the same and the pedestrian access route from Allenby Road will also be retained, the proposal includes the provision of a new pedestrian/cycle access north of the leisure centre on the east side of the site.

10 The proposal also includes:

- 86 car parking spaces, including nine disabled spaces, along the west boundary of the site.
- 150 cycle parking spaces.
- Landscaping- including allotments, a science garden, a faith garden, pond, and informal play areas.

The proposed development



Front elevation



3D drawing of the proposed development



Sources: Nicholas Hare Architects; Balfour Beatty Education

Case history

11 The is no relevant case history.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- Education *London Plan*
- Playing fields *London Plan; PPG17, draft PPS Planning for a Natural and Healthy Environment*
- Urban design *London Plan; PPS1*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Climate Change *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor's Energy Strategy; Mayor's draft Climate Change Mitigation and Adaptation Strategies; Mayor's draft Water Strategy; Sustainable Design and Construction SPG*
- Air quality *London Plan; the Mayor's Air Quality Strategy; draft replacement air quality strategy; PPS23*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13;*

13 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 2004 Ealing) and the London Plan (Consolidated with Alterations since 2004).

14 The draft replacement London Plan, published in October 2009 for consultation, is also a material consideration.

Education and community facilities

15 The London Plan seeks to support and maintain high quality educational opportunities and life choices for London's children. This proposal is part of Ealing Council's 'Building Schools for the Future' programme which is rooted in the Government Building Schools for the Future scheme, providing funding to rebuild or refurbish all secondary schools in England over the next 10-15 years to ensure that all children are educated in modern and efficient facilities. The construction of new modern facilities would, in principle, enhance education facilities and is supported. Draft Replacement London Plan Policy 3.19 also supports development proposals which enhance education and skills provision.

16 London Plan policy 3A.24 'Education facilities' sets out that the use of the educational facilities should be maximised out of school hours. The use of the school facilities by the local community is also encouraged by London Plan Policy 3A.18 'Protection and enhancement of social infrastructure and community facilities' and the London Plan Policy 3D.6 'The Olympic and Paralympic Games and sports facilities'. Whilst the applicant has not provided detailed information on how it intends to make the site and its facilities accessible for wider community use, it has stated that it envisages out-of-hours community use the sporting facilities. Sport England has been consulted on the re-provision of sports facilities on the site and has stated that community access and use of the sports facilities should be guaranteed by condition and a community use agreement should be submitted by the applicant.

17 The proposed replacement of education and sports facilities comply with London Plan Policy 3A.24. Further detail is requested, however, regarding the use and availability of the facilities to the community and this should be set out in a community use agreement. The

community use agreement should be secured through a planning condition or unilateral agreement in order for the proposal to comply with London Plan Policies 3A.24, 3A.18 and 3D.6.

Playing fields

18 Whilst there is no specific policy on the loss or prejudice of playing field within the existing London Plan, the Draft Replacement London Plan Policy 3.20 states, “proposals that result in a net loss of sports and recreational facilities, including playing fields should be resisted.” The policy also notes multi-use public facilities for sport and recreational activity should be encouraged. As the site is a playing field ‘Planning Policy Guidance 17: planning for open space, sports and recreation’ is relevant.

19 The existing open space on the site is 28,071 sq.m. whilst the amount of open space proposed in the new development is 29,982 sq.m. Therefore there will be a net increase of 1,911 sq.m of recreational open space which is welcomed. However, the redevelopment of the school buildings on the playing fields north of the current buildings will impact on the use of the playing field during the construction phase to allow the existing school to remain open whilst the new school is being built. The applicant should set out clearly how they intend to phase the development to minimise the impact on the use of the external sporting facilities.

20 Sports England has stated that whilst it is generally satisfied with the principal of the development, it has put forward a number of conditions to be attached to any permission granted, including the requirement for a community use agreement (discussed above), a management and maintenance scheme, fully accessible facilities for people of all physical capabilities and the competition of the sporting facilities to the standards set out in Sport England’s guidance note. GLA officers support these conditions.

21 The increase in the amount of high quality recreational open space is welcomed. However, the conditions put forward by Sport England should be attached to any permission to ensure that high quality sporting facilities are delivered on the site. The applicant should also set out clearly how they intend to phase the development to minimise the impact on the use of the external sporting facilities.

Urban design

22 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the Blue Ribbon Network. The draft replacement London Plan reinforces these principles, with new development required to have regard to its context, and reinforce or enhance the character, legibility and permeability of the neighbourhood (policy 7.1).

Siting, massing and layout

23 The submitted design and access statement provides an analysis of the site context, an explanation of the design processes and considerations that have given rise to the proposals. The masterplan illustrates the relationship of the application site and the proposals to the existing and surrounding built environment, providing a clear vision for the new school.

24 The proposed new school building ranges from one to three stories in height and the proposed scale, height and massing of the buildings have been broadly designed to respect the

relationship to the surrounding properties, and are therefore the scheme is considered appropriate for its setting. Consideration has also been given to natural daylight, wind and noise. The proposed siting and layout of the new school buildings would optimise the benefits in terms of daylight and sunlight whilst at the same time addressing the design constraints imposed on the site, and this is supported.

25 The internal access, however, between the classroom 'wings' at the back of the building and the ICT facilities/offices at the front of the building is poor. As the ICT facilities are likely to be frequently accessed by pupils from various blocks, the architect should consider improving the access to the ICT facilities by introducing additional links so that access to these facilities can be made within the same level.

26 The rationale of enhancing the pedestrian entrance from Allenby Road is supported, as this would improve the connectivity to the school and make good use of a route that is currently not in use. The rationale of providing 150 covered cycle parking spaces is welcomed. However, it is not clear where these cycle parking facilities are located. The architect should therefore provide further information to show the exact location of the cycle parking spaces.

Landscaping

27 The proposed landscape scheme is of high quality and defines the existing screening around the site, the structure of the space for the new school buildings and sub division of the application site. However, the architect is asked to consider relocating the proposed design and technology workshop building as it appears to be located too close to the site boundary, and would cause adverse impact on the perceived visual amenity of the properties on Lovell Road.

Parking arrangement

28 Whilst the siting of the proposed car park is unlikely to cause detrimental effect on the amenity of the surrounding residential properties, the proposed parking arrangement is considered poor. The parking spaces are located too far away from the building. The parking spaces towards the southern part of the site are too isolated from the school buildings and lack natural surveillance. The architect is therefore asked to reconfigure the parking layout so that the spaces are closer to the school building and are located in areas that are well overlooked.

Access

29 The application identifies opportunities to improve upon existing, and provide new, pedestrian links to the school site. These identified links connect with existing houses in the wider area and will encourage increased pedestrian and cycle movement and are supported. Further information about the delivery of these routes should be provided as part of this application.

30 Currently the main vehicular access is from Dormers Wells Lane and this will be the same as for the reconfigured school. Whilst it is stated in the applicant's planning statement that the pedestrian access can be obtained from the same point in Dormers Wells Lane and Allenby Road, it is stated on the proposed site plan that only vehicular access will be permitted to Dormers Wells Lane. The applicant should therefore clarify this.

31 Whilst the rationale of introducing an additional new pedestrian and cycle link to the north of the sports centre is supported, this has not been shown on the proposed site plan and as such officers are unable to assess the quality of this formal access point to the site.

Conclusion

32 Many principles and aspirations for delivering good quality design on the site have been put forward in the submitted design and access statement. The proposals would provide for an increased range of facilities to meet the needs of the teacher, pupil and the local community. However, revisions should be made to the internal configuration of the school to improve its connectivity, and the design of the car park and design and technology outdoor workshops should also be amended in order for the scheme to comply with London Plan Policies 4B.1, 4B.3 and 4B.9.

Access

33 London Plan Policy 4B.5 'creating an inclusive environment' expects all future development to meet the highest standard of accessibility and inclusion. This, together with the Supplementary Planning Guidance 'Accessible London: achieving an inclusive environment' underpins the principles of inclusive design and the aim to achieve an accessible and inclusive environment consistently across London. Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all of us, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of Policy 4B.5 is to ensure that proposals achieve the highest standards of accessibility and inclusion not just the minimum. Furthermore, educational establishments have a duty under the Disabilities Discrimination Act 2005 to ensure that their facilities and services are accessible for disabled students.

34 The proposed school building has been designed to a high standard and it is clear that accessibility and inclusion has been considered. However, the applicant should incorporate a bridge/corridor link between the front and the back of the building on the first floor. The proposed layout requires a disabled user of the ICT suite, 6th form common rooms and offices at the front of the building to travel down to the ground floor, across the building to the second lift and then up the required floor. Whilst this route is unnecessarily complicated for all users, it would be particularly onerous on disabled users.

35 The proposed development does not comply with London Plan Policy 4B.5 because it does not meet the highest standards of accessibility and inclusion. The applicant should alter the design of the building to include a bridge/corridor link on the first floor between the front and back of the building.

Climate Change

36 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to the mitigation of and adaptation to climate change and to minimise carbon dioxide emissions (Policy 4A.1). Chapter 5 of the draft replacement London Plan sets out the approach to climate change and requires developments to make the fullest contribution to minimising carbon dioxide emissions.

Climate change mitigation

37 London Plan policies 4A.4 – 4A.11 focus on mitigation of climate change and require a reduction in a development's carbon dioxide emissions through the use of passive design, energy efficiency and renewable energy measures. The London Plan requires developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures and prioritising decentralised energy, including renewables.

Baseline carbon dioxide emissions (policy 4A.4 of London Plan)

38 The carbon dioxide emissions of the proposed development have been modelled using building regulations compliance modelling software. However, no overall estimate of the annual tonnes of CO₂ emissions has been provided. An estimate of the absolute annual CO₂ emissions, including unregulated emissions, should be provided.

Energy efficiency standards (Policy 4A.3 of the London Plan)

39 A wide range of range of passive design features and demand reduction measures are identified to reduce the carbon emissions of the proposed development. These measures include reducing air permeability and heat loss parameters well beyond the minimum requirements set by building regulations. Energy efficient lighting/controls and air handling systems with low specific fan power are also highlighted for inclusion. However, the extent to which these measures alone enable 2006 building regulations to be exceeded is unclear; this needs to be clarified. Additionally, the same section of the report contains a statement that all information contained in the report has no bearing on the actual design of the proposed development. A clear, unambiguous commitment to a high level of energy efficiency savings and the associated measures is required.

District heating (policies 4A.5 and 4A.6 of the London Plan)

40 It is not clear from the information provided whether or not there are any external district heating networks in the vicinity of the development. This should be investigated.

41 The development's heating requirements will be supplied from a series of high efficiency boilers. These will feed the low temperature hot water radiators, air handling unit heat batteries and other uses. The applicant should confirm that the boilers planned for the development will all be incorporated in a single energy centre.

Combined Heat and Power (Policy 4A.6)

42 Due to the limited daily opening hours and substantial periods of time the school is unoccupied the applicant has rejected the use of CHP. Given the type of building in question, which has relatively short heating periods, it is accepted that CHP is not appropriate in this case.

Cooling (Policies 4A.6 of the London Plan)

43 The applicant has identified various design features that help avoid the need for active cooling. These include controlling solar gain through the use of high performance glazing and maximising the use of natural ventilation. In the limited number of areas where cooling is required, this will be provided by roof mounted chillers.

Renewable energy technologies (policy 4A.7)

44 The applicant has considered a wide range of renewable energy options and is proposing to install a 150kW biomass boiler as the lead heat source for the development. This will provide an estimated 66% of the total heat requirements and reduce carbon emissions by a further 15%. 30m³ of fuel storage space is proposed and supply/delivery issues have been considered. Information has been provided in relation to the envisaged air quality implications and this is considered separately by the GLA Air Quality Team.

45 The applicant is also proposing to install 450 sq.m. of photovoltaic panels to reduce emissions by a further 10.5% and supply 15% of the development's electricity demand. This commitment is welcomed. Indicative drawings showing the location of the proposed PV panels should be provided.

Conclusion

46 Further information is required to determine whether the application complies with London Plan Policies 4A.4-4A.11. A condition stating that upon completion and prior to occupation of the development, no less than 450 sq.m. of photovoltaic panels, with a southern component and absent of significant shading throughout the year should be mounted on the roof on the development, should be attached to any granted permission.

Climate change adaptation

47 The London Plan promotes five principles in policy 4A.9 to promote and support the most effective adaptation to climate change. These are to minimise overheating and contribute to heat island effects; minimise solar gain in summer; contribute to flood risk reduction, including applying sustainable drainage; minimising water use; and protect and enhance green infrastructure. Specific policies cover overheating, living roofs and walls and water. The draft replacement London Plan also includes policies to ensure the development makes the fullest contribution to London's adaptation to climate change.

48 London Plan Policy 4A.11 *Living roofs and walls* states that major development should incorporate living roofs and walls where feasible. Living roofs or wall have not been incorporated into the proposed development and the applicant has not offered any reason for this. Whilst there are photovoltaic panels on the east roof section, it is possible that living roofs could be incorporated into the design of the lower roofs. The applicant should investigate and provide information regarding the feasibility of incorporating living roofs into the proposed development. If it is found to be feasible, the inclusion of living roofs in the final development should be secured by a S106 condition.

49 London Plan Policy 4A.14 *'Sustainable drainage'* promotes sustainable urban drainage systems. The applicant has stated it intends to incorporate sustainable urban drainage system into the proposed development but it has not provided any further details.

50 London Plain Policy 4A.16 *'Water supplies and resources'* seeks to protect and conserve water supplies and water resources. The applicant is considering a number of measures to reduce water usage in the proposed development, including flow restrictors on taps, water leak detection systems and rainwater harvesting. The applicant should outline which measures it intends to incorporate into the scheme.

51 The proposed development does not comply with London Plan Policy 4A.11 and further information is required to determine whether it complies with London Plan Policies 4A.14 and 4A.16. The applicant should investigate and provide information regarding the feasibility of incorporating living roofs into the proposed development. If it is found to be feasible, the inclusion of living roofs in the final development should be secured by a S106 condition. The applicant should provide further details of the proposed sustainable urban drainage system and outline which water conservation measures it intends to incorporate into the scheme.

Air Quality

52 London Plan policy 4A.19 *'Improving air quality'* seeks to ensure that air quality is taken into account in planning applications along with other material planning considerations, and that formal air quality assessments should be undertaken where appropriate, particularly in designated Air Quality Management Areas. Draft Replacement London Plan policy 7.14 *Improving air quality* states that development proposals should aim to be 'air quality neutral' and not lead to further deterioration of existing poor air quality, that offsetting should be used to ameliorate negative impacts associated with development proposals, and that increased exposure to existing poor air quality should be minimised.

53 The submitted air quality assessment indicates that the proposed development would have implications for air quality within an Air Quality Management Area for nitrogen dioxide and particulate matter will be affected. In its current form the assessment is not considered to be fully conclusive and further information is required from the applicant.

54 The Borough of Ealing has been designated as a Smoke Control Area under the Clean Air Act. The applicant states that the biomass boiler will be an exempt appliance and therefore comply with the requirements of the Clean Air Act. Further detail, including the boiler make and model should be provided to verify it is an exempt appliance. The applicant should refer to Table 4.2 in the Environmental Protection UK's guidance document (Biomass and Air Quality Guidance for Local Authorities in England and Wales) for full details of the information requirements.

55 The applicant has included a basic air quality assessment with the application, using a screening method detailed in AEAT's 2007 report 'Review of the Potential Impact on Air Quality from Increased Wood Fuelled Biomass in London'. This method has since been updated by Technical Guidance (Screening Assessment for Biomass Boilers, AEAT 2008) and is not considered appropriate within an AQMA.

56 In order to address these issues the applicant should undertake detailed dispersion modelling of the biomass and natural gas boiler emissions during operation using an appropriate dispersion model. Significance should be compared against EPUK's guidance document and further details of the modelling requirements can be found in the London Borough of Ealing's Supplementary Planning Guidance. The assessment should also include the effects of operational traffic, unless justification can be provided as to why traffic related impacts can be excluded from the assessment.

57 A code of construction practice, including reference to the London Councils and GLA Best Practice Guidance (The control of dust and emissions from construction and demolition) should be submitted to the London Borough of Ealing for approval prior to on site works and should be included as a planning condition.

58 Further information is required to determine whether the application complies with London Plan Policy 4A.19. The applicant should submit the information requested above.

Transport

Access / layout issues

59 The proposed pedestrian and vehicles access arrangements are considered to be broadly acceptable. The access road from Dormers Wells Lane will be six metres in width to accommodate two-way traffic. Swept path diagrams for a refuse vehicle should be provided for this access together with a drawing to show how pedestrian access is achieved.

Car parking

60 There are no proposed changes to the level of car parking at the site with 76 spaces being maintained, this is considered to be acceptable. The provision of 9 disabled parking bays is welcomed.

61 Electric charging facilities should be provided for a minimum of 20% of the parking provision (15 spaces) with management of the charging arrangements included within the Travel Plan document to ensure compliance with the Draft Replacement London Plan Policy 6.13 'Parking'.

Cycle parking

62 150 cycle parking spaces are proposed (75 sheffield stands) which is considered to be acceptable and in line with the London Plan standards which has a requirement of one space per 10 staff or students.

Walking and cycling

63 An existing pedestrian crossing is located across Dormers Wells Lane which serves the southern access. The opening of the Allenby Road access as the primary pedestrian access would mean that there would be a significant increase in pedestrian activity on Allenby Road and it is requested that a pedestrian crossing be investigated across Allenby Road in the vicinity of the entrance to ensure it complies with London Plan Policy 3C.21 *'Improving conditions for walking'* and Draft Replacement London Plan Policy 6.10 *'Walking'*, which seeks to provide safe and convenient walking routes to and from sites.

Trip generation and impacts of the proposals

64 There is minimal information in relation to the effects of the proposed increases in student and staff numbers. However, given the information provided on the proposals it is not considered that there would be a noticeable impact on the strategic road network or Transport for London road network. The increases in bus passengers to and from the school are not considered to be of a level that will require any capacity improvements and associated financial contributions.

Servicing & Delivery

65 TfL requests submission of a Delivery and Servicing Plan to rationalise servicing with the aim to reduce the total number of trips made and to avoid critical times on the road network to ensure it complies with London Plan Policy 3C.25 *'Freight strategy'* Draft Replacement London Plan Policy 6.14 *'Freight'*. The final document should be secured through the S106 agreement.

Construction Impact

66 TfL requests submission of a Construction Logistics Plan (CLP), which should seek to minimise highway and traffic impact to the highway network during the course of construction, to be agreed with the Borough. The document is required to ensure it complies with London Plan Policy 3C.25 and Draft Replacement London Plan Policy 6.14 and should be secured through the S106 agreement.

Travel Plan

67 To comply with London Plan Policy 3C.2 *'Matching development to transport capacity'* and Draft Replacement London Plan Policy 6.3 *'Assessing transport capacity'* a revised travel plan document should be submitted for the new school, including reference to associated increases in pupil/staff numbers with revised targets and measures such as cycle training for pupils and car sharing for staff. The final document should be secured through the S106 agreement.

68 In conclusion, additional information is required to ensure the proposal complies with London Plan Policies 3C.21, 3C.2, 3C.25 and Draft Replacement London Plan Policies 6.13, 6.10, 6.3 and 6.14.

Local planning authority's position

69 The position of the Ealing Council is unknown.

Legal considerations

70 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

71 There are no financial considerations at this stage.

Conclusion

72 London Plan policies on education and community facilities, urban design, access, climate change, air quality and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Education and community facilities:** The proposed replacement of education and sports facilities comply with London Plan Policy 3A.24. The community use agreement should be secured through a planning condition or unilateral agreement in order for the proposal to comply with London Plan Policies 3A.24, 3A.18 and 3D.6.
- **Urban design:** Whilst the scheme broadly complies with London Plan urban design policies, the scheme should be amended to fully comply with policies 4B.1, 4B.3 and 4B.9 of the London Plan.
- **Access:** The proposed development does not comply with London Plan Policy 4B.5 because it does not achieve the highest standards of accessibility and inclusion.
- **Climate change mitigation:** Further information is required to determine whether the application complies with London Plan Policies 4A.4-4A.11.
- **Climate change adaptation:** The proposed development does not comply with London Plan Policy 4A.11 and further information is required to determine whether it complies with London Plan Policies 4A.14 and 4A.16.
- **Air quality:** Further information is required to determine whether the application complies with London Plan Policy 4A.19.
- **Transport:** Additional information is required to ensure the proposal complies with London Plan Policies 3C.21, 3C.2, 3C.25 and Draft Replacement London Plan Policies 6.13, 6.10, 6.3 and 6.14.

73 On balance, the application does not comply with the London Plan. The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Education and community facilities:** The community use agreement should be secured through a planning condition or unilateral agreement in order for the proposal to comply with London Plan Policies 3A.24, 3A.18 and 3D.6.

- **Urban design:** Revisions should be made to the internal configuration of the school to improve its connectivity, and the design of the car park and the design and technology outdoor workshops should also be amended as set out in paragraphs 21-33 of this report.
- **Access:** The applicant should alter the design of the building to include a bridge/corridor link on the first floor between the front and back of the building.
- **Climate change mitigation:** The applicant should submit the information requested in paragraphs 38-47 of this report.
- **Climate change adaptation:** The applicant should investigate and provide information regarding the feasibility of incorporating living roofs into the proposed development. If it is found to be feasible, the inclusion of living roofs in the final development should be secured by a S106 condition. The applicant should provide further details of the proposed sustainable urban drainage system and outline which water conservation measures it intends to incorporate into the scheme.
- **Air quality:** The applicant should submit the information requested in paragraphs 53-59 of this report.
- **Transport:** The applicant should submit the information requested in paragraphs 60-69 of this report.

for further information, contact Planning Decisions Unit:

Colin Wilson, Senior Manager – Planning Decisions

020 7983 4783 email colin.wilson@london.gov.uk

Justin Carr, Strategic Planning Manager (Development Decisions)

020 7983 4895 email justin.carr@london.gov.uk

Gemma Kendall, Case Officer

020 7983 6592 email gemma.kendall@london.gov.uk
