planning report D&P/4043/01
18 July 2016

Mayfield School, Hanwell
in the London Borough of Ealing
planning application no.161902FULR3

<table>
<thead>
<tr>
<th>Strategic planning application stage 1 referral</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>The proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Full planning application for redevelopment of a primary school.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>The applicant</th>
</tr>
</thead>
<tbody>
<tr>
<td>The applicant is Education Funding Agency on behalf of London Borough of Ealing, and the architect is Peter Taylor Associates Ltd.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Strategic issues</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Land use principle:</strong> The proposed school development is ‘inappropriate’ on Metropolitan Open Land and very special circumstances must be demonstrated. The applicant should provide robust educational needs assessment, accompanied by a detailed alternative site analysis and visual impact assessment of the development on the openness of the MOL. In the absence of this information, the proposal is not supported in strategic planning terms and does not comply with policy 7.17 of the London Plan and NPPF policies. (Paragraphs 18-29).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>That Ealing Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 50 of this report. However, the possible remedies set out in that paragraph could possibly lead to the application becoming compliant with the London Plan. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.</td>
</tr>
</tbody>
</table>
Context

1. On 8 June 2016 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 19 July 2016 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 to 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 1,000 square metres or a material change in the use of such building.”

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

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

Site description

5. Mayfield Primary School is a 1.5-form entry (FE) primary school in Hanwell, located within Metropolitan Open Land. The building is not listed nor is it located adjacent to listed buildings. The site is not located within a Conservation Area.

6. The school was built in circa 1973 and comprises one large single storey building, with a two storey element centred on the site. The existing building is proposed to be demolished. The site lies within a residential area of Hanwell, comprising predominantly post-war housing and flatted developments. The site is bounded by High Lane to the east and Brent Valley Park to the north, south and west. The site is situated in a predominantly green area with a number of established trees surrounding the site. The River Brent lies to the west of the site and to north of the site is a community allotment.

7. Immediately opposite the school to the east, lie the rear gardens and garages of properties on Bridge Avenue. The distance between the site and the rear of these houses is approximately 45 metres. There is a private detached residential property with garden and associated parking adjacent to the main school entrance, which is occupied by the school caretaker. This will remain untouched as part of the proposals.

8. The east of the site is predominantly residential in character, comprising two storey post-war, semi-detached and terrace dwellings. To the south east, approximately 150 metres from the site, lie a number of four storey post-war apartment blocks.

9. The site has one access point via High Lane with a separate turnaround area which allows for easy access to the main entrance of the school. There is a small area for car parking available, providing 7 car parking spaces. The turnaround area and car parking spaces will remain as existing as part of the proposal.
10 The public transport accessibility level (PTAL) of the site is 1, based on a scale of 1a to 6b where 1a is lowest and 6b is highest. There is one bus route within a walkable 200 metres of the site: the E11 which runs between Greenford and Ealing with 3 buses per hours in each direction. There is neither a London Underground nor National Rail service within walking distance to the site.

11 The nearest section of the Transport for London Road Network (TLRN) is A40 Western Avenue, which is approximately 1.7 kilometres north of the site. The nearest section of the Strategic Road Network (SRN) is A4020 Uxbridge Road, which is approximately 1.3 kilometres south of the site.

Details of the proposal

12 The application seeks full planning permission for phased demolition of the existing school buildings and the redevelopment of the site with the erection of part 1, 2 and 3 storey building. The proposal includes the expansion of the school to 2-form entry, a new library, large studio and music rooms, and an allotment garden to develop gardening and teamwork skills for students and the wider community.

13 The scheme is led and funded by the Education Funding Agency’s ‘Priority Schools Build Programme.’

Case history

14 There is no case history relevant to the current application.

Strategic planning issues and relevant policies and guidance

15 The relevant issues and corresponding policies are as follows:

- **Education**: London Plan; Mayor’s Social Infrastructure SPG;
- **Metropolitan Open Land**: London Plan;
- **Urban design**: London Plan;
- **Access**: London Plan; Accessible London: achieving an inclusive environment SPG replacement;
- **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;
- **Flood management**: London Plan;
- **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 Ealing Council’s 2012 Core Strategy DPD, 2013 Development Management DPD, and Planning for Schools DPD (Adopted, May 2016), and the 2016 London Plan (Consolidated with Alterations since 2011).

The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework, the Mayor’s Social Infrastructure SPG (2015) and Ealing Council’s are also relevant material considerations.

**Principle of land use: Provision of school on MOL**

In relation to the provision of educational facilities, policy 3.18 ‘Education facilities’ of the London Plan states that “Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes”. Furthermore, paragraph 72 of the NPPF states ‘The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement and to development that will widen the choice of education. They should give great weight to the need to create, expand or alter schools.’

The application site is part of a larger area identified as Metropolitan Open Land (MOL). The London Plan (policy 7.17) gives MOL the same level of protection as Green Belt and Paragraphs 79-92 of the NPPF on Green Belts apply equally to Metropolitan Open Land. The NPPF (paragraph 89) sets out that only development associated with agriculture, forestry, outdoor sport and recreation, limited infilling and redevelopment of existing sites is appropriate in the Green Belt. All other forms of development are, by definition, ‘inappropriate’. In order for ‘inappropriate’ development to be acceptable in the Green Belt, very special circumstances must apply.

The NPPF (paragraph 87) sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in ‘very special circumstances’. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

Mayfield Primary School is maintained by Ealing Council providing 315 places. The proposals will increase the size of the school from 1.5-form entry to 2-form entry, in addition to the existing nursery, and will accommodate 420 places for children aged 5-11 plus children in the nursery aged 3-4, by 2020.

Meeting the exceptions set out in the NPPF: The applicant asserts that the proposal meets the exceptions set out in paragraph 89 of the NPPF, given that the proposed building has a reduced footprint and site coverage than the existing building. Whilst the proposed school building will cover 17.5% of the site area, which is 3.5% less than the existing school building, the proposed building is materially larger than the one that it replaces in terms of height and floor space, therefore will have greater impact on the openness of the MOL. As such, the proposal is inappropriate development on MOL, which requires very special circumstances to be demonstrated.

Educational need: The Mayor supports the expansion of schools and acknowledges that there are various factors that limit potential sites and configurations. However, the applicant needs to robustly set out the predicted demand for school places across the borough and in particular the catchment area in Hanwell and how this is being met. Given that the application site has not been identified as a suitable and deliverable site for a new primary school in Ealing Council’s ‘Planning for
Schools Development Plan Document’, demonstrating the need for the expansion of this site is crucial.

24 **Alternative site analysis**: Similarly, as the site is not identified as a suitable and deliverable site by the Council’s Planning for Schools DPD, the requirement for a robust alternative site analysis is also critical.

25 **Impact on the openness of the MOL**: To make a quantitative impact assessment of the proposed school redevelopment on the openness of the MOL the applicant has submitted a site comparison table as shown below detailing the dimensional increases/decreases in comparison with the existing buildings. It demonstrates that the proposed building is three metres taller and has 51% more floor space, and as such is materially larger than the existing building.

<table>
<thead>
<tr>
<th></th>
<th>Existing School Building</th>
<th>Proposed School Building</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Height</td>
<td>Single storey with flat roof: 4.8m</td>
<td>Single storey flat roof: 4.85m</td>
<td>3.05 metres in part</td>
</tr>
<tr>
<td></td>
<td>Single storey with pitched roof: 6.2m</td>
<td>Double storey flat roof: 8.6m</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Double height part of the building: 8.7m</td>
<td>Three storey element: 11.75m</td>
<td></td>
</tr>
<tr>
<td>Footprint</td>
<td>1991sqm</td>
<td>1813sqm</td>
<td>-278sqm</td>
</tr>
<tr>
<td>Floor space (GfE)</td>
<td>1991sqm</td>
<td>2410sqm</td>
<td>419sqm</td>
</tr>
<tr>
<td>Location of buildings on site</td>
<td>Central</td>
<td>South east</td>
<td>n/a</td>
</tr>
<tr>
<td>% of site covered by buildings (site area 7485sqm)</td>
<td>21%</td>
<td>17.5%</td>
<td>-3.5%</td>
</tr>
</tbody>
</table>

26 Whilst such a comparison is useful to assess the impact on the openness of the MOL, in order to fully assess the qualitative impact, the applicant is required to submit a more detailed visual (CGI) impact assessment of the development from different vantage points. (For further details see the design section below.)

**Summary**

27 Given the development is inappropriate on MOL, very special circumstances should be demonstrated (such as educational need in the local area), accompanied by a detailed alternative site analysis and visual impact assessment of the development on the openness of the MOL. In the absence of this information, the proposal is not supported and does not comply with policy 7.17 of the London Plan and the NPPF policies.

**Community use**

28 The London Plan policy (3.18E) expects the community use of educational facilities to be maximised. The applicant has committed to preparing and implementing a community use plan to ensure the availability of the school’s facilities to the local community outside of school hours. The new library would allow the school to re-open their dual-language library and provide out of hours story time sessions for parents and young children.

29 Furthermore, the school hall and kitchen have been located adjacent to the vehicular entrance to allow for secure access for community groups and clubs outside of school hours. The provision of accessible bathrooms and an increase in accessible outdoor space will enable more extra-curricular clubs without the need to open up the entire school. A proposed allotment garden will allow the school to establish a Mayfield Growing Garden and develop gardening and teamwork skills for the wider community.
The above measures are strongly supported, and the applicant should continue its early engagement with the local community, nearby schools, extra-curricular clubs and sport clubs in the preparation and implementation of its community use plan, to extend the use of its educational and recreational facilities, in a form that can be secured by the Council to ensure delivery.

**Urban design**

Good design is central to all objectives of the London Plan (2016) and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London.

Internal layouts, including teaching areas, circulation areas and ancillary spaces have been sized and designed to accord with relevant government design guidance for schools. The proposed layout will assist in achieving good levels of daylight penetration and means of natural ventilation, which is supported. The landscaping works include improving the outdoor space, providing allotment gardens, larger hard play areas, shaded social spaces and the opportunity for a ‘learning bus’ and performance area. The proposal aims to create a rich and varied landscape for pupils’ learning and recreation areas whilst also establishing a clear, simple and accessible arrival and serving arrangements, maximising the separation of pupils and vehicles. This is supported.

Notwithstanding the above positive design approaches, the principal urban design issue in strategic planning terms is the need to protect the open quality of the MOL. Although the form and massing strategy is broadly consistent with the scale of neighbouring development and the spatial constraints of the site mean that there are limited layout/massing options available that would meet the accommodation needs of a school of this type and scale, the increased height of the building does raise significant concern given the site’s MOL status. The applicant should therefore submit a detailed visual assessment that demonstrates the additional visual impact the massing and appearance of the school block will have on the open quality of the MOL. This assessment should include ‘before and after’ (CGI) visuals from key viewpoints to enable officers to make an informed judgement on the degree of visual impact.
Access

34 The applicant has ensured that level access is provided to all external doors to the school and within the building including the main reception area. All internal door openings will have clear opening widths as set out in Building Regulation Approved Document M (ADM) ‘Vol 2 – Access to and use of buildings other than dwellings.’ Horizontal access has been designed to avoid physical or visual barriers and segregation of pupils and vehicles. Two staircases provide both means of escape and circulation needs supplemented with a lift which traverses all the three floors, providing wheelchair access to all parts of the school. Ambulant disabled WC facilities which comply with Building Regulation ADM are provided on each floors and another located in the reception area. Acoustic treatment to all classrooms and workrooms meets the Department of Education output specification. Visual and tactile signage will be employed throughout the building.

35 As such, the proposed development complies with inclusive design policy (7.2) of the London Plan. However, the applicant needs to consider the provision of at least one disabled parking bay.

Sustainable development/energy

36 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed redevelopment. The applicant should provide further information on the energy efficiency features proposed for the redevelopment (i.e. building services, ventilation, lighting, systems etc.). The applicant should outline the measures taken to avoid overheating and minimise cooling demand in line with Policy 5.9. Dynamic thermal modelling in line with CIBSE guide TM52 and TM49 is encouraged. The redevelopment is estimated to achieve a reduction of 2 tonnes per annum (7%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development. The applicant has provided the sample BRUKL of the ‘be lean’ scenario; however, the applicant should clarify the heat pump system proposed, its operation and ensure that it is taken into consideration under the correct energy hierarchy tier.

37 The applicant has confirmed that there are no existing or planned district heating networks within the vicinity of the proposed development. A commitment should be provided to ensuring that the development is designed to allow future connection to a district heating network should one become available, in line with Policy 5.6, especially given that the development is in the vicinity of a number of opportunity areas and of a potential district heating network. The applicant should also clarify if a site heat network is being proposed and should confirm that all uses on site will be connected to the site heat network. A drawing showing the route of the heat network linking all uses on the site should be provided. The applicant should again clarify if the site heat network will be supplied from a single energy centre. Information on the floor area and location of the energy centre should be provided. Due to the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

38 The applicant proposed to install 110 sq. m of photovoltaic (PV) panels. A detailed roof layout should be provided indicating the proposed PV installation. A reduction in regulated CO₂ emissions of 8 tonnes per annum (30%) will be achieved through this third element of the energy hierarchy. The applicant should clarify if an Air Source Heat Pump (ASHP) is being proposed and, as stated in the comments above; include any relevant savings under the ‘be green’ scenario. If an ASHP is proposed, revised BRUKL files should be provided.

39 Overall, a reduction of 10 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is proposed, equivalent to an overall saving of 37%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan. However, the comments above should be addressed before compliance with London Plan energy policies can be verified.
Flood management

40 Flood risk: A flood risk assessment and drainage strategy has been submitted. Given that the site is located close to the River Brent, within Flood Zones 2 and 3, an Exception Test is required. In principle, the proposed finished floor levels will mitigate flood risk sufficiently to pass the Exception Test. Environment Agency mapping reveals that the majority of the site is not at risk of significant surface water flooding. However, parts of the site (particularly the northern boundary) are at risk of surface water flooding, and there are risks in the wider catchment, particularly along the adjacent High Lane (the main access route for the school site).

41 Sustainable drainage: The risk of surface water flooding on and around the site makes the application of London Plan policy 5:13 particularly important. The FRA proposes only a 30% reduction in surface water runoff. However, the proposed runoff rates are sufficiently low that it in principle complies with London Plan policy 5.13. Whilst the proposed surface water discharge to the River Brent is welcomed, the applicant should incorporate green roofs and both rainwater harvesting and ponds in a way that any risks of which can be managed appropriately.

42 Finally, any attenuation tanks proposed should be designed to also provide benefit during lower order storm events by utilising the Method 2 tank design on the CIRIA Susdrain website: ‘designing attenuation storage for redeveloped sites’.

Transport

43 Vehicular access for the proposal will remain through the small access road off High Lane which will become a one way system to restrict vehicle flow. However, a new pedestrian access point has been proposed south of the vehicular access, closer to the existing zebra crossing on High Lane, which is supported. The proposal does not include any alterations to the existing car parking arrangement to the school site, which provides seven car parking spaces. The applicant is not proposing to provide further parking on site due to the small increase in staff number anticipated, this is accepted. However, to comply with London Plan policy on inclusiveness the applicant should consider the provision of at least one disabled parking bay.

44 The proposed phased redevelopment of the school allows an increase of 75 pupils to the school roll, at the initial phase. The applicant therefore predicted that 23 additional pupils will travel to and from the school by cars, three by bus, and 48 by foot. It is also anticipated that one additional pupil will commute to school by bike. As such, the proposal would not have significant impact on the highway network or the existing bus route that serves the site; therefore no mitigation measures are required.

45 The applicant should clarify the level of cycle parking which will be provided for the proposed redevelopment. TfL expects the cycle parking to be in line with the London Plan policy 6.9 and the latest London Cycle Parking standards, which require that 56 cycle parking spaces be provided assuming the full occupancy of 420 pupils and 30 full time staff. The provision of scooter spaces for school pupils is encouraged. In line with London Plan policy 6.9 and 6.10, a pedestrian environment review system audit (PERS) and cycle level of service assessment (CLOS) should be carried out to identify local walking and cycle improvement needs. Ealing Council is encouraged to secure improvements based on the finding of these studies.

46 Given the scale and nature of the redevelopment, a framework construction and logistics plan (CLP) is also required. The CLP should include the cumulative impacts of construction traffic, likely construction trips generated, and mitigation proposed. It must also include safety measures to minimise the conflict between construction vehicles and /staff/visitors in order to ensure their safety during the construction phase. In line with London Plan policy 6.3, a draft school travel plan has been submitted. TfL welcomes that the school has set an initial 3 years target to reduce car travel by
pupils from 29% to 20%; along with a 5% increase in cycle mode share as well as for walking. The finalised travel plan should be secured by s106 agreement, and be accredited by the TfL School Travel Plan Accreditation scheme (STAR).

**Local planning authority’s position**

47 Ealing Council planning officers are generally supportive of the scheme and are working towards addressing some concerns which include the height and scale of the proposal, the need for alternative site analysis, visual impact assessment, details of sustainable drainage system, and security issues.

**Legal considerations**

48 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**

49 There are no financial considerations at this stage.

**Conclusion**

50 London Plan policies on principle of land use: provision of school on MOL, community use, urban design, access, sustainable development/energy, flood management and transport are the key strategic issues relevant to this planning application. 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:

- **Principle of land use** – The proposed school development is ‘inappropriate’ on Metropolitan Open Land and very special circumstances must be demonstrated. The applicant should provide robust educational needs assessment, accompanied by a detailed alternative site analysis and visual impact assessment of the development on the openness of the MOL. In the absence of this information, the proposal is not supported in strategic planning terms and does not comply with policy 7.17 of the London Plan and NPPF policies.

- **Urban design**: The applicant should submit a detailed visual assessment that demonstrates the additional visual impact the massing and appearance of the school block will have on the open quality of the MOL. This assessment should include ‘before and after’ CGI visuals from key viewpoints to enable officers to make an informed judgement on the degree of the visual impact.

- **Inclusive design**: The proposal complies with inclusive design policy (7.2) of the London Plan. However, the provision of at least one disabled parking bay should be considered.

- **Sustainable development/energy**: The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan. However, further information should be submitted and
concerns addressed in regard to overheating and cooling demand, heat pump system, future proofing, site heat network, and ASHP, before compliance with London Plan energy policies can be verified.

- **Flood management:** The proposed finished floor levels will mitigate flood risk sufficiently to pass the Exception Test, required due to the site’s location within flood zones 2 and 3, and adjacent to River Brent. Although, the FRA proposes only a 30% reduction in surface water runoff, the proposed runoff rates are sufficiently low that the scheme complies with London Plan policy 5.13. However, further consideration of rainwater harvesting and ponds is required and clarification should be provided on attenuation tanks proposed.

- **Transport:** The car parking arrangement is acceptable; however the applicant should consider the provision of at least one disabled parking bay. Clarification is required on the level of cycle parking. The submission of finalised travel plan, PERS, CLOS and CLP should be secured.

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

- **Stewart Murray, Assistant Director – Planning**
  020 7983 4271   email: stewart.murray@london.gov.uk

- **Colin Wilson, Senior Manager – Development & Projects**
  020 7983 4783   email: colin.wilson@london.gov.uk

- **Tefera Tibebe, Case Officer**
  020 7983 4312   email: tefera.tibebe@london.gov.uk