Dulwich Hospital, East Dulwich Grove  
in the London Borough of Southwark  
Planning application no. 16/AP/2740

**Strategic planning application stage 1 referral**

**The proposal**
Demolition of existing ward buildings and nurses accommodation and development of site to provide a new secondary school within the retained and refurbished 'Chateau' building fronting East Dulwich Grove and in a series of new buildings and extensions up to 5 storeys high, comprising teaching and administration spaces, dining and indoor sports hall, multi-use games area, accesses, car parking and servicing areas and landscaping (Use Class D1).

**The applicant**
The applicant is the London Borough of Southwark, and the architect is Feilden Clegg Bradley Studios.

**Strategic issues summary**
- **Land use** – use of the site for new secondary school is supported. (paras.16-20)
- **Urban design and heritage** – Further information on the heritage significance of nurses’ home and feasibility of retaining the domed end bays should be submitted. The case for demolition of the remaining structures is accepted. Design of new buildings supported. (paras.21-31)
- **Climate change** – further information required on energy and flood risk. (paras. 35-53)
- **Transport** – further work on bus capacity, cycling, parking and pedestrian environment required. (paras.54-64)

**Recommendation**
That Southwark Council be advised that while the application is generally acceptable in strategic planning terms the application does not fully comply with the London Plan, for the reasons set out in paragraph 69 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.
On 19 July 2016 the Mayor of London received documents from Southwark 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 29 August 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.

Two planning applications have been submitted and referred to the Mayor for development on the same site (the other application being D&P/4053a, LPA ref: 16/AP/2747, for the erection of a new health centre on the eastern part of the site). Whilst neither application proposal is referable in itself, the two concurrent applications would amount to development with a total floorspace of more than 15,000 sq.m. Paragraph 2 of the Schedule of the Order 2008 states that: “If the local planning authority receive an application for planning permission for development, which they consider forms part of more substantial proposed development, on the same land or adjoining land, they must for the purposes of this Schedule treat that application as an application for planning permission for the more substantial development.”

This application is thus referable under Category 1B.1 (c), of the Schedule of the Order 2008: “Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres”.

Once Southwark 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; take it over for his own determination; or allow the Council to determine it itself.

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

The wider application site is approximately 2.8 hectares in size and is occupied by buildings associated with Dulwich Community Hospital. The site is bounded to the north by the mainline railway and a Jewson’s building supplies yard, to the south by East Dulwich Grove and to the east and west by housing.

The existing buildings on the site are predominantly Victorian red brick hospital buildings comprising of a central entrance block known as the “Chateau” and two connected three storey wings to the west. The eastern part of the site used to house two mirroring wings plus some ancillary hospital buildings, but these were demolished in 2006 and this part of the site is currently vacant land. The site is not within a conservation area and the buildings are not statutorily or locally listed.

The Education Funding Agency (EFA) has purchased three parcels of the site from the NHS and these are to be leased to the Charter School East Dulwich on a peppercorn rent for 125 years. The sale agreement with the NHS will see these parcels released to the EFA as follows:

- Parcels 1 and 2, the north–east and south–west parcels, were released on contract completion in October 2015.
• Parcel 3, the central parcel, is expected to be released in April 2019 when the NHS clinical services are relocated to the new Dulwich Health Centre.

(Parcels 1, 2 and 3 together comprise 2.1 hectares and form the application site for the school.)

• Parcel 4, in the south-east corner of the site is being retained by the NHS for the development of the Dulwich Health Centre and is the subject of a separate planning application. It comprises 0.7 hectares.

9 The site has highway frontage/access onto East Dulwich Grove and Jarvis Road, which form part of the local road network. The nearest part of the Transport for London Road Network (TLRN) is approximately 2.5 km away (Peckham High Street) and the nearest part of the Strategic Road Network (SRN) is approximately 200m away (Lordship Lane). The site is well served by a network of on and off-highway cycle and pedestrian routes, including the proposed Quietway 7.

10 Six bus routes currently stop on East Dulwich Grove outside the site or on Lordship Lane. An additional route will also stop on East Dulwich Grove from this autumn. East Dulwich (Southern services) station is a 200 – 500m walk depending upon proximity to the Jarvis Road access. Measured on a scale of 1a – 6b the site has a PTAL rating of 3 which is considered moderate with that part on Jarvis Road having a PTAL of 4 (good).

Case history

11 There is no relevant GLA case history for this site.

Details of the proposal

12 The application seeks full planning permission for the demolition of the existing buildings (excluding the central “Chateau” building) and construction of an 8 form entry secondary school within three new buildings and the refurbished Chateau building in the western part of the site.

Strategic planning issues and relevant policies and guidance

13 The relevant issues and corresponding policies are as follows:

- Land use principle  
  London Plan
- Education facilities  
  London Plan; Social Infrastructure SPG
- Health facilities  
  London Plan; Social Infrastructure SPG
- Urban design and Heritage  
  London Plan; Shaping Neighbourhoods: Character and Context, SPG
- Inclusive access  
  London Plan; Accessible London: achieving an inclusive environment SPG
- Climate change  
  London Plan; the Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy; Sustainable Design and Construction 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 Southwark Core Strategy (2011), the Southwark Plan (2007) (saved policies), and the 2016 London Plan (Consolidated with Alterations since 2011).

The following are also relevant material considerations:

- Dulwich SPD (2013)
- Dulwich Hospital Planning Brief (2005)

**Principle of development**

**Education facilities**

London Plan Policy 3.18 ‘Education Facilities’ offers strong support for the establishment of new schools, including free schools. The policy states that development proposals which enhance education provision will be supported, including new build, expansion of existing or change of use to educational purposes. Proposals which address the projected shortfall of primary and secondary school places will be particularly encouraged. The policy states that “In particular, proposals for new schools, including free schools, should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the use of planning conditions or obligations.” Additionally, the Social Infrastructure SPG states that new sites for schools should be secured to meet additional educational need.

The site is proposed to accommodate a new 8-form entry state secondary school (plus sixth form) run by the Charter School, which has an existing free school in North Dulwich. The existing Charter School is within a mile of this site and is heavily oversubscribed. The GLA strongly supports the establishment of a new school that will meet educational need.

The school would provide modern, purpose built facilities including a generous proportion of open space and formal/informal playspace. The quality of the school provision would be good, and the school proposal is supported. The school’s facilities, such as the MUGAs, hall, IT rooms and classrooms, should be shared with other schools if there is an identified need, and should be made available out of hours to other users for community or recreational use, in accordance with London Plan Policy 3.18 (paras. E and F). Provision should be made within the s106 agreement to secure out of hours community use of the school’s facilities.

**Redevelopment of health care uses**

The school would be built on the site of the existing Dulwich Community Hospital. London Plan Policy 3.18 (Health and Social Care facilities) states that “Development proposals which provide high quality health and social care facilities will be supported in areas of identified need, particularly in places easily accessible by public transport, cycling and walking. Where local health services are being changed, the Mayor will expect to see replacement services operational before the facilities they replace are closed, unless there is adequate justification for the change.”
The separate, concurrent application (ref: 4053a) makes provision for a replacement healthcare facility on the site. Although the existing hospital buildings have an extensive floor area, it is understood that the majority of the floorspace is vacant and unoccupied. The applicant should clarify how much floor space of the existing hospital is actually in use, and how much is vacant. It is understood that the new healthcare centre will provide GP services and a pharmacy, services for people with long term conditions (including chronic kidney disease, diabetes, heart disease, chronic asthma and some mental health services), diagnostics and outpatient services, and primary care children’s services. However, if any existing services are to be relocated off-site or not reprovided, this should be clarified and justified by the applicant. Provided that the new facility will provide equivalent or improved healthcare services compared to the existing site, and that the phasing of the proposals are secured by s106 to ensure the continuous provision of healthcare services throughout the development process, the GLA support the proposal to redevelop the existing hospital site for school and healthcare use.

Urban design and heritage

Good design is central to all objectives of the London Plan 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. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (policy 7.4). With respect to heritage assets, London Plan policy 7.8 states that “Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.”

Principle of Demolition

The proposal involves the demolition of the existing pair of Victorian ward blocks to the west of the central Administration Building, also known as the Chateau (a further pair of identical ward blocks to the east of the Administration Building were demolished in 2006). The linking access galleries to the west of the Chateau entrance block would also be demolished, along with the freestanding former nurses’ home to the west of the site. The entrance block (Chateau) and porter’s lodge would be retained and refurbished for the school’s use. Whilst the buildings are not statutorily or locally listed, and are not within a conservation area, it is recognised that the chateau, the ward blocks and access galleries and the nurses’ accommodation have townscape merit and heritage value and can thus be considered non-designated heritage assets.

The National Planning Policy Framework (NPPF) states, in respect of non-designated heritage assets: “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.” (para.135)

The applicant has submitted a heritage impact assessment which appraises the value of the existing buildings and assesses the degree of harm which would be caused by the proposed demolition of the western ward blocks and associated buildings to the rear of the existing chateau.

The assessment notes that, due to the superior architectural quality and relatively good state of repair of the Chateau, this is the building of greatest historic significance on the site.
The remaining ward blocks have fallen into a state of partial disuse and disrepair although they do retain features of historic interest (notably the domed sanitation towers at the ends of each block which also give considerable architectural presence). The report acknowledges that the loss of the western ward blocks will result in detrimental impact on the townscape and on the appreciation of the historic significance of the remaining buildings as a hospital. However, it is noted that this historic significance has already been severely eroded by the demolition of the eastern ward blocks which has resulted in the loss of the symmetry to the original pavilion style hospital complex. The harm caused by the demolition could be offset by the restoration of the Chateau, which would be better revealed by the demolition of the dominant ward blocks.

24 The applicant’s design and access statement explains that the retention of the ward blocks and access galleries was considered as part of the redevelopment scheme, but found not to be feasible due to the poor state of repair of the buildings and their physical characteristics, e.g. the width of the blocks relative to the central corridor, which do not lend themselves to providing modern teaching spaces of the required standard. The proposal is thus to demolish the ward blocks, and retain and restore the chateau by removing unsympathetic modern additions, thus allowing the building of greatest historical significance to be better revealed.

25 Officers note that there is no specific reference within the applicant’s heritage assessment to the early 20th Century arts and crafts style building to the west of the site, which also has heritage significance and will also be demolished. It is unclear why this building has not been included in the significance plan as it forms part of the site. An assessment of the significance of these buildings and the feasibility of retaining them should also be provided before the application is referred back to the Mayor at Stage 2.

26 Of the buildings to be demolished, the most significant loss would be the pair of twin-domed end bays to the western ward blocks, which are highly distinctive architectural features within the townscape. It is acknowledged that the retention of these blocks would not sit well within the current proposed school layout. However, the applicant should explain further how the retention of these end bays were considered within the design of the scheme, and why their retention was rejected in the final submitted design.

27 With these exceptions, the effect of the proposals on the significance of the non-designated heritage assets has been taken into account in the application, as required by the NPPF. In accordance with the NPPF, the scale of the harm or loss of the non-designated heritage assets should be weighed against the benefits of the proposal. In this case, officers accept that the remainder of the existing buildings would be difficult to reuse and refurbish in order to provide a modern school. It is also accepted that harm to the overall significance of the hospital complex has already been caused by the demolition of the eastern ward blocks. Subject to the further clarification on the domed end bays and the nurses’ home, it is considered that the loss of the historic hospital structures is outweighed by the proposals to provide a new secondary school to meet educational need.

28 The harm can also be partly mitigated by the proposals to secure significant improvements to the retained buildings, particularly the Chateau. In this respect, the Council should ensure via appropriate condition or in the s106 agreement that the schedule of refurbishment works to the chateau, Porter’s Lodge, railings, gates and piers and the surrounding grounds (outlined in section 3.2 of the applicant’s heritage assessment) are carried out to a high standard.

Built form and layout
29  The layout of the school complex would position the taller four–five storey teaching blocks towards the rear of the site, adjoining the boundary with the railway and builders’ depot. A three storey block containing the dining hall and sports hall would be located near to the western boundary, and playing pitches would separate this building and the retained chateau. A two storey block would be built to the rear of the chateau, and the new three storey health centre would be positioned to the east of the retained building. The front boundary with East Dulwich Grove would continue to be dominated by the row of mature London Plane trees and the Victorian boundary railings, which would be retained and refurbished.

30  The new buildings would be flat roofed and predominantly clad in red brick to complement the materials of the chateau and the buildings in the surrounding area. The new buildings would be intentionally simple in form and detailing, and would have a contemporary appearance whilst not competing with the ornate detail of the retained chateau building. The scale and position of the new buildings have been designed to allow the retained building and its roofscape to be fully appreciated in its new context.

31  The buildings are considered to sit comfortably within their context and the calm detail and simple complementary materials will allow the chateau building to be appreciated in its new setting. The design of the new school is thus supported. Whilst the need for some of the extensive areas of hard surfaces within the school complex is understood, the landscaping strategy should maximise the opportunity for soft landscaping and planting, which would provide a greater opportunity for sustainable drainage (see paras 48-53) and this should be secured via condition. In this respect, reduced car parking as noted in the transport section could also enable a better design response and the opportunity for more soft landscaping whilst still meeting justified needs for on-site drop off/pick up and parking. This should be further explored by the applicant. The retention of the trees on the site’s frontage and their protection during construction should also be carefully controlled.

**Inclusive access**

32  London Plan Policy 7.2 seeks to ensure that all new development achieves the highest standards of accessible and inclusive design. In accordance with this policy, the applicant has submitted a design and access statement which explains how the principles of inclusive design have been incorporated into the proposed development and how inclusion will be maintained and managed.

33  The applicant’s design and access statement addresses key points regarding inclusive access for the school. It is confirmed that there would be level access throughout the buildings and the external circulation spaces with accessible lifts to all floors. Accessible sanitary facilities will be provided. There would be three accessible parking spaces for use by school staff, which would be located close to the main entrance.

34  A detailed access strategy, including information on how teaching spaces will be designed to accommodate staff and students with visual or hearing impairments, and will be flexible to suit pupils with special educational needs, as well as drop-off arrangements for students with disabilities or SEN should be submitted as part of an appropriate condition. As well as ensuring that a number of the classrooms (including specialised classrooms) can be fitted with a hearing enhancement system as and when required, provision should be made for all sports hall, assembly or theatre spaces to have a hearing enhancement system fitted. The Council should secure by condition this detailed inclusive access strategy for both parts of the development, which addresses the points raised above. The access strategy should also explain how the route between the school and the nearby bus stops, and the bus stops themselves, are accessible.
Climate change mitigation and adaptation

35 The London Plan climate change policies as set out in Chapter 5 collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies with a target of 20% carbon reductions from on-site renewable energy. The policies set out ways in which applicants must address mitigation of and adaptation to the effects of climate change.

36 The applicant has submitted an Energy Assessment which broadly applies the energy hierarchy in policy 5.2 of the London Plan. However, further information and revisions are required before the carbon savings can be verified, as outlined below.

Energy efficiency standards

37 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include a carefully considered approach to the buildings’ orientation and high efficiency light fittings.

38 The demand for cooling will be minimised through efficient thermal mass, natural ventilation where possible and mechanical ventilation with heat recovery on all other spaces. Centralised mechanical cooling will be introduced in the form of Air Handling Units (AHUs). The applicant should provide evidence of how London Plan Policy 5.9 has been assessed demonstrating how the risk of overheating and the cooling demand will be minimised (for each building type). Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 is recommended.

39 Based on the information provided, the savings achieved are not clear for the proposed development. The applicant should provide the figures for the carbon emissions and savings in tonnes per annum for each stage of the energy hierarchy. This should be provided for each building and for the total site. See Table 1 and Table 2 in the latest GLA assessment guidance for the required format: https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0

40 The BRUKL sheets including efficiency measures alone should be provided to support the savings claimed.

District heating

41 The applicant should carry out an investigation into whether there are any existing or planned district heating networks within the vicinity of the proposed development. The applicant should particularly pursue the option of a linked network with the proposed Dulwich Hospital on the adjacent site. Evidence of communication should be provided in order to demonstrate that this option has been fully investigated.

42 The applicant has stated that installing a district heating network across the site would be an additional expense and, since the project is under financial pressure, any provision of such an expensive system would reduce the budget available for providing effective teaching environments. The applicant must provide a whole life cost (WLC) analysis comparing the communal and individual systems. If it can be demonstrated and evidenced that the WLC of the site heat network is significantly higher than that of individual systems and would undermine the development going ahead, the site heat network could be deemed uneconomic. However, for the avoidance of doubt and in line with the London Plan and the GLA’s Guidance on Preparing
Energy Assessments, a site heat network is strongly supported in order to enable the buildings to be supplied from on-site low and zero carbon energy sources, should these become available in the future.

Further information should also be provided on the plant room(s) proposed and information on the floor area and location of the energy centre. Taking into account the proposed phasing of the development, the applicant should further investigate how the number of plant rooms can be minimised.

**Combined Heat and Power**

The applicant has investigated the feasibility of CHP. However, due to its intermittent nature, CHP is not proposed. This is accepted in this instance.

**Renewable energy technologies**

The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 280sq.m on the roof of Building C. It is stated that the PV array has been sized so that the overall reduction in CO2 is 35%. This approach is proposed due to the project being under budgetary pressure. As such, PVs are not required for Buildings A/B and D, as these buildings already meet the 35% reduction in carbon emissions through fabric performance and system efficiencies. However, the applicant has confirmed that, if the carbon emissions reductions through passive and efficiency measures are not achieved at a later stage in the project, the available space on the roof can be used for a PV array, ensuring that the 35% reduction can be met. The installation of further solar PV would be supported in order to maximise carbon savings on site and comply with Policy 5.7.

The full sample BRUKL sheet of the ‘be green’ scenario should be provided to support the savings claimed and to estimate the carbon reduction.

**Overall carbon savings**

The applicant has stated that each building will be achieving 35% reduction compared to a 2013 Building Regulations compliant development. However, the total side-wide carbon emissions and savings for each stage of the energy hierarchy have not been provided in the energy statement. The total carbon emissions and savings in tonnes per annum for each stage of the hierarchy should be provided before the strategy is verified. See Table 1 and Table 2 in the latest GLA assessment guidance for the required format: [https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0](https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0).

**Flood risk and drainage**

The Flood Risk Assessment (FRA) has been completed by Ramboll on behalf of the applicants. The FRA confirms that the site is located within flood Zone 1. The FRA refers to the areas of surface water flood risk present on the site and considers that these pose a low risk of flooding and does not propose any mitigation measures.

However, the Environment Agency surface water flood risk mapping indicates that the surface water risk follows a flow path and appears to contribute to a larger area of surface water risk beyond the site. Therefore the FRA should consider the nature of the planned land uses and ground levels along this route in order to determine that the existing relatively low risk will not impact any vulnerable buildings and that the new development does not risk exacerbating the current risk.
Therefore the FRA should be re-examined in order to determine whether the proposed development is acceptable in terms of London Plan Policy 5.12.

Drainage

The site itself has relatively low surface water flood risk. However areas close to the site, including to the immediate north and east are at significant surface water risk, and surface water from this site will contribute to that risk, therefore the application of London Plan policy 5.13 will be an important consideration for these development proposals.

The FRA states that the development will be designed to reduce surface water run-off from the site up to the 1 in 100 year storm by at least 50%. The FRA goes on to state that this requirement will be met without the inclusion of the extensive green roofs into the calculations, and that therefore the actual reduction will be in excess of 50%. The methods proposed include permeable paving, infiltration and below ground attenuation tanks.

Given the nature and location of the proposals this approach is considered to be the minimum acceptable approach to London Plan Policy 5.13. The detailed drainage design should be agreed with Southwark Council and a condition securing a sustainable drainage strategy meeting the requirements of London Plan Policy 5.13 should be applied to any planning approval.

Transport

The site borders the Network Rail (NR) corridor and early consultation with NR is advised to avoid any adverse impacts arising during construction.

Network impact

The development proposals are unlikely to have a negative impact on the capacity or operation of the TLRN or the SRN. Southwark Council should ensure that it is satisfied with the impacts on local highway including the proposed accesses for vehicles, pedestrians and cyclists off Jarvis Road and East Dulwich Grove. Some issues need to be addressed to enable compliance with the London Plan, as further detailed below.

Walking and cycling

Cycle parking which meets the requirements of London Plan policy should be provided from the outset. Currently the proposals are for 72 spaces to be installed at the school and for further provision to be made as and when the pupil roll and demand dictate. The applicant should clarify how and when additional provision would be made. However, to comply with London Plan minimum standards 240 spaces are required for pupils, 23 for staff and 17 for visitors (total 280 spaces). To avoid discouraging cycling through under provision and the risk of suitable sites being used for other purposes, at least the full 280 spaces should be designed in from the outset. The phasing arrangement for the physical provision of the spaces should be agreed with the Council and secured as part of the permission, enabling this to be easily enforced by the Council.

Given the opportunities for cycling in the area and the intended local catchment, consideration should be given to cycle parking above the minimum policy requirement for staff, pupils and visitors to the school. Cycle parking for visitors should be located close to the main entrance and the cycle parking for students and staff should be in covered secure area(s) near to...
school entrances. Cyclist changing and locker facilities should also be provided for staff. The developers should consult the London Cycle Design Guidance as it sets out standards for cycle parking generally, including access to cycle parking. Compliant cycle parking and associated facilities should be secured by planning condition.

58 An audit of both the pedestrian and cyclist environment in the area and any identified improvements should be secured as part of any permission. Ensuring safe and convenient crossing of East Dulwich Grove should in particular be considered for those walking to the site or using local bus services.

Car parking and drop off

59 23 car parking spaces are proposed (including 3 blue badge spaces) for staff of the school. A reduction in the level of car parking to a car free or car capped development would be encouraged, although policy complaint blue badge parking should be provided in addition to electric vehicle charge points. Consideration should also be given to the need for on street parking controls related to the school use of the site.

60 It is understood that drop off and pick up of students will occur on street. TfL has raised concern about the impact this may have on the safety and convenience of users of other more sustainable and active modes of travel and compound the existing problems of school-generated car and coach trips in the wider area. Furthermore it may affect bus operations on East Dulwich Grove including the stops adjacent to and opposite the proposed school site. On-site drop off and pick up of disabled students and visitors should be incorporated together with similar provision for minibuses and coaches transporting pupils to off-site activities.

Buses

61 Further assessment is required of the potential impact of the school, in particular on the capacity of local buses including consideration of pupil home locations and their likely means of travel. Given the high demand in the area for bus travel at school peaks, in addition to a Travel Plan, the preparation of a School Travel Demand Management Plan is encouraged to spread peak loadings and enable coordination with other nearby schools.

62 An assessment should also be made of the adequacy of the existing bus stops to accommodate a significant number of waiting and alighting passengers especially in the after school peak.

Delivery and Servicing

63 All servicing will be on site and should be managed through a Delivery and Service Plan (DSP) secured by condition. A Construction Logistics Plan (CLP) should also be secured by condition to appropriately manage any potential adverse effects on the highway network, including vulnerable road users and bus operations, during the works. This should cover arrangements during construction of the final phase of the school when the earlier two phases and the health centre will have opened.

Travel Plan

64 A robust travel plan for the school (including use outside of school hours), should be submitted and agreed by the Council prior to first occupation. The travel plan should be secured, enforced, monitored and reviewed by condition/legal agreement. Given the intended catchment area of the school and to promote sustainable and active travel, students should be encouraged
to either walk, cycle or take public transport to school and any necessary improvements to these links should be secured by condition/legal agreement.

Community Infrastructure Levy

65 In accordance with policy 8.3 of the London Plan, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. However, development for educational use has a nil charge.

Local planning authority’s position

66 It is understood that the application will be reported to Southwark Council’s planning applications committee in October 2016 and that officers are broadly supportive of the proposals.

Legal considerations

67 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, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected 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

68 There are no financial considerations at this stage.

Conclusion

69 London Plan policies on principle of land use, education and health facilities, design, heritage, inclusive access, climate change, and transport are relevant to this application. The application is supported in land use and design terms. Further information is required to demonstrate full compliance with the London Plan in terms of climate change and transport, as follows:

- **Principle of land use**: The use of the land for educational use and healthcare use is supported.

- **Design and Heritage**: Further information on the significance of the nurses’ home and the feasibility of retaining the domed end bays of the ward blocks should be submitted. The justification for the demolition of the remaining structures is accepted in view of the benefit of providing a new school, the previous alterations to the historic significance of the complex and the mitigation in the form of the restoration of the retained building. The approach to the design, appearance and layout of the new buildings is supported overall, however additional soft landscaping should be provided.

- **Inclusive access**: A detailed accessibility strategy should be secured by condition.

- **Climate change**: Further information is required to verify the site-wide carbon savings. The figures for the carbon emissions and savings in tonnes per annum for each stage of the energy hierarchy should be provided. A whole life cost (WLC) analysis comparing communal
and individual systems should be submitted to justify the absence of a site wide heat
network. The option of a linked network with the adjacent site should be further pursued.
Further information on the feasibility of including PV equipment should be provided. The
applicant should revise the flood risk assessment to take account of information from the
Environment Agency mapping.

- **Transport:** The development should provide at least a London Plan-compliant level of
cycle parking in a phased delivery and additional information should be submitted on this.
Consideration should be given to reducing car parking. A pedestrian and cycle environment
audit should be carried out and any improvements identified as necessary should be
secured. The off-site drop off arrangements should be further analysed and reconsidered.
Further assessment is required of bus capacity and bus infrastructure to ensure that the
additional impact of the school can be accommodated. School travel and demand
management plans, construction management plan and delivery and service management
plan should be secured via condition or the Section 106 agreement.

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