Strategic planning application stage 1 referral (new powers)


The proposal

Extension and alterations comprising extending the existing classroom block within the playground and linking this to a new rear extension which in turn extends further towards the east of the site, creating a courtyard, terminating with a multipurpose hall (Class D1) - (Planning and Listed Building Application)

The applicant

The applicant and the architect is Pastor Ltd.

Strategic issues

Education use, Green Belt, listed buildings and heritage, design, access, sustainable development, transport and parking are the key strategic issues considered.

Recommendation

That Hounslow Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 80 of this report; but that the possible remedies set out in paragraph 82 of this report could address these deficiencies. The application does not need to be referred back to the Mayor if Hounslow resolve to refuse permission, but it must be referred back if Hounslow resolve to grant permission.

Context

1. On 2 November 2011 the Mayor of London received documents from Hounslow 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 13 December 2011 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.
The application is referable under Category 3D of the Schedule to the Order 2008: “Development on land allocated as Green Belt... which would involve the construction of a building with a floor space of more than 1,000 square metres.”

Once Hounslow 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 Hounslow Council resolves to refuse permission it need not refer the application back to the Mayor.

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

Site description

A planning application and related listed building application have been submitted for the redevelopment of a site that comprises the existing Grade II listed building (“The Rectory”), now known as Fortescue House, and surrounding grounds. The site is located within the Hanworth Park Conservation Area and designated Metropolitan Green Belt. The site is also within the defined Feltham and Hanworth regeneration area.

The site adjoins Hanworth Park and is accessed via Park Road from the A314 Hounslow Road just north of its junction with the A316 Great Chertsey Road. As shown in Figure 1, the property is set back from the main road and is approached by a long private dual access driveway. Further access is provided, by covenant, from Castle Way to the south of the site. Although sited in a predominately residential area, the property itself is secluded with no immediate neighbours. Properties on Park Road consist predominantly of 3-4 storey residential apartments; there is also a commercial builder’s yard and naval social club.

Figure 1: The application site in context - (Source: applicant’s submitted doc)
The site has been used as an educational establishment since 1984 under its current lawful planning use of D1 (education use). It was last occupied by Little Eden Educational Trust, a non-profitable church organisation, in 2003 in the capacity of a primary and secondary school. The property was entered on the English Heritage Building’s at Risk Register in 2008. The property has been vacant since 2003.

The application site shares three boundaries with Hanworth Park, including Rectory Meadow, the fourth boundary is shared with privately owned open land on either side of the driveway. Rectory Meadow includes a single storey football clubhouse, associated pitches and small spectator stands, several abandoned tennis courts, informal parking areas and an overgrown bowling green. Further east is the elevated section of the A316 Great Chertsey Road overshadowed by 3-4 storey residential apartments further to the south. Further southeast is Castle Way comprising primarily of semi-detached houses and 3-4 storey apartments.

Access to the site is from Park Road which connects to Hounslow Road. Hounslow Road links the A316 and 312, both of which are part of the Transport for London Road Network. Two bus routes run along Hounslow Road (111, H25) and there is a further bus service on Country Way/ A316 (route 290). The nearest railway station is Feltham, over 2km from the site, and there is no London Underground station within easy reach of the site. Hence, the public transport accessibility level of the site is 1b (where 1 is low and 6 is high).

Details of the proposal

Extensions and alterations comprising extending the existing classroom block within the playground and linking this to a new rear extension which in turn extends further towards the east of the site, creating a courtyard, terminating with a multipurpose hall (Class D1) - (Planning and Listed Building Application).

The multi-purpose hall is intended for sports, assembly, drama and community use. The community use envisaged would be limited to sports activities, drama production, assembly (including wedding receptions), product launches etc.

Case history

In August 2010, a similar planning application was submitted for redevelopment of the site to provide a D1 (education) use, incorporating the retention of the Grade II listed building, with two-storey extensions including the creation of a multipurpose hall and associated landscaping and parking. The proposal was considered by the Mayor on 21 September 2010 and he broadly supported the scheme with some concerns related to Green Belt, enabling development, design, sustainable development, transport and parking. On 15 December 2010, the Council refused the planning application, and subsequently, an appeal was lodged and dismissed for the following reasons (summarised): The benefits fall well short of outweighing the disbenefits in the form of inappropriate development in the Green Belt, harm to openness, harm to the character and appearance of the conservation area, harm to the setting of the listed building and increased highway safety risks. Very special circumstances therefore do not exist and planning permission and listed building consent must be refused.

Planning Permission and Listed Building Consent was refused in 2007. The application was for the change of use from class D1 (School) to C1 (Residential Care Home) for sixteen service users with works to include the reinstatement of wooden sash windows and internal alterations thereto, and various additions.
Strategic planning issues and relevant policies and guidance

14 The relevant issues and corresponding policies are as follows:

- Education London Plan; Ministerial statement July 2010
- Green Belt London Plan; PPG2
- Historic Environment London Plan; PPS5
- 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)
- Sustainable development 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
- Transport London Plan; the Mayor’s Transport Strategy; PPG13; Land for Transport Functions
- Parking London Plan; the Mayor’s Transport Strategy; PPG13

15 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 2003 Hounslow Unitary Development Plan and the 2011 London Plan.

16 The following are also relevant material considerations:

- Hounslow Core Strategy Development Plan Document (at Preferred Options stage).

Principle of use/ education

17 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”.

18 The applicant has provided information demonstrating the need for this type of school in the catchment area. Having regard to the recent Ministerial statement (July 2010) attaching great weight to the desirability of establishing new schools, the need for the school is not necessarily disputed. It is also acknowledged that it is a continuation of the lawful use and would enable the restoration of a listed building at risk.

19 The applicant has stated that the size of the multipurpose hall will be 306 sq.m. and that it has been adopted as part of the current revised proposal and considers being the minimum not only for an independent academic use but also for the community use envisaged.

20 However, there is no educational justification for this size of the hall. The applicant should set out plans for the use of the hall of this scale and how this use is to be managed and how it will be available for community use.
The application site is designated as Green Belt. Policy 7.16 of the London Plan clearly indicates that Green Belt is to be protected from inappropriate development, and such inappropriate development should not be approved except in very special circumstances. The London Plan also makes clear that London’s growth should be sustainable and not encroach on London’s own precious green spaces (paragraph xi). The reference to “inappropriate development” flows directly from PPG2, which sets out the Government’s policy towards Green Belt.

PPG2 identifies the purposes of Green Belt, which are: to check the unrestricted sprawl of large built up areas; to prevent neighbouring towns from merging; to assist in safeguarding the countryside from encroachment; and to assist in urban regeneration by encouraging the recycling of derelict land. Government guidance states that development is inappropriate unless it is for the following purposes:

- Agriculture and forestry
- Essential facilities for outdoor sport and recreation; for cemeteries; and for other uses of land, which preserve the openness of the Green Belt
- Limited extension, alteration or replacement of existing dwellings
- Limited infilling or redevelopment of major existing developed sites identified in adopted development plans, which meet the criteria in Annex C of PPG2

The proposed development is inappropriate as defined by PPG2, the London Plan and Hounslow UDP policies. That said the only possible justification for allowing this proposal would be if very special circumstances could be demonstrated i.e. sufficient to outweigh the harm that would be caused to the Green Belt by the inappropriate development. There is no precise definition of ‘very special circumstances’ and each planning application has to be judged on its own merits.

In July 2011 the Government published a ‘draft National Planning Policy Framework’ (dNPPF) for public consultation, which is intended to replace all existing national planning policy (PPGs and PPSs). The dNPPF maintains that inappropriate development should only be permitted where ‘very special circumstances’ exist. Paragraph 144 sets out that ‘A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this include the replacement of a building provided the new building is not materially larger than the one it replaces.’

The appeal decision of the 2010 application sets out that the proposal would seriously affect openness and conflicts with the Green Belt protection aims.

The proposal seeks full planning permission for a continued educational use of the site under its current lawful planning use of D1, retaining the listed building and two wings of two storey buildings and a multipurpose hall. Although most of the new development is on existing hard surfaced area, it does encroach onto green belt and there are significant footprint and floor space increases. The spatial changes envisaged with the revised application are detailed in (Section 3.14 of Design & Access Statement Addendum).
<table>
<thead>
<tr>
<th></th>
<th>Existing</th>
<th>Previous Proposal</th>
<th>Revised Proposal</th>
<th>Reduction</th>
<th>Previous Proposal</th>
<th>Revised Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Footprint</strong></td>
<td>482</td>
<td>1686</td>
<td>1584.09</td>
<td>101.91</td>
<td>350%</td>
<td>329%</td>
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<tr>
<td><strong>Gross External Floor Space.</strong></td>
<td>732</td>
<td>2850</td>
<td>2569.66</td>
<td>280.34</td>
<td>389%</td>
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27 In the table above, compared with the refused planning application (2010) which had significant footprint increase of 350% and floor space increase of 389%, the current application appears to have reduced the scale of the development. However, the increase in floor space in the current application is still significant. Further discussion is needed with the Council to establish if the reduction in size of the development addresses the appeal decision of the 2010 application.

28 The current revised proposal (Section 5.3 of the Design & Access Statement Addendum) details an additional 36 parking spaces at the South West of the site in the form of soft plastic reinforced ‘grasscrete’ parking. This area was not originally part of the curtilage of the listed building as evidenced in the Statement of Significance and therefore the proposed parking could have a negligible impact to the setting of the listed building. The Inspectorate Report (IR-34) stated that “This area is separated from the house by a bank of undergrowth and trees and parked cars would not be easily visible within the setting of the rectory”.

29 The appeal decision of the 2010 application sets out that the harm to the Green Belt and the Listed Building may be outweighed by significant benefit.

**Very special circumstances**

30 The applicant has identified very special circumstances to justify the proposal.

31 **Enabling development:** The applicant has referred to policy HE9.1, HE9.2 and HE11.1 in PPS5 and associated English Heritage guidance for enabling development where this is necessary to secure the future conservation of a heritage asset. The listed building is included on English Heritage’s at risk register and is in an extremely poor state of repair. In principle the need for a certain amount of enabling development is accepted as being a very special circumstance. However, it is important that the criteria set out in policy HE11 of PPS5 is met, in particular that the level of development is the minimum necessary to secure the future conservation of the heritage asset and of a design and type that minimises harm to other public interests (in this case the Green Belt).
The applicant has carried out an extensive options appraisal looking at alternative uses and concluded that other uses would either require more substantial enabling development or have less likelihood of being delivered. This may be acceptable, however, further evidence that English Heritage is satisfied that policy HE11 has been adequately applied will be necessary before the application is referred back to the Mayor.

**The fall back position:** The property has been used as an educational establishment since 1984. This is an established use and there is no proposal for change of use. This is acceptable to some degree as the application does not seek any change of use, but will have limited weight in relation to justifying the proposed inappropriate development on the Green Belt. Again on the scale of development that it is the minimum necessary English Heritage should be satisfied that its criteria are met.

**The need for autistic/physically impaired children specific provision:** the applicant has identified that the number of primary school age children diagnosed with autism has increased significantly over recent years over and above the current local authority provision; there are currently no autistic specific schools within the Borough of Hounslow. It is stated that the additions have been designed with full consideration of the physically impaired and would not only allow 100% access for the physically impaired but would also address the current access issues to the Heritage Asset.

Normally applicants for development in the Green Belt would be required to demonstrate that there was no alternative site available for the use proposed. However, here the applicant has sought to find a viable and long term use that enables the restoration of the listed building. Therefore such an exercise is not necessary. The need for additional special needs provision is not necessarily disputed, but in itself would not be a very special circumstance. However, combined with the restoration of the listed building with a viable long term use would contribute to an overall case of very special circumstances.

**Hard surfaced area:** The applicant has stated that a significant proportion of the new extension would be sited in already existing hard surfaced areas and as such there would be no encroachment into the countryside or material effect on the trees or the environment.

It is accepted that the additional buildings are located on existing hardstanding, and to some extent screened by existing vegetation. However, it does result in a substantial increase in floorspace and footprint, which is harmful to the Green Belt and therefore this is not accepted as a very special circumstance.

**Urban sprawl:** The applicant has stated that the additions are limited and to be located within the envelope of existing development thereby countering any argument of urban sprawl and there is no historic town to protect in this instance and the site is located a fair distance from neighbouring wards and therefore any merger with other town(s) and/or village(s) is not applicable thereby countering any argument of urban sprawl.

This comment relates to the purposes of the Green Belt set out in PPG2. Not every site would be expected to meet every purpose. In this case the site clearly meets other purposes and this is not accepted as a very special circumstance.

In summary, while not all the very special circumstances put forward by the applicant are accepted, the need for enabling development could justify the inappropriate development. However, further evidence that English Heritage accepts that it is the minimum amount necessary is required. Further discussion is required with the Council as to whether the benefits of the scheme outweigh the harm.
Listed buildings and historical significance

41 PPS5: Planning for the Historic Environment provides advice on the conservation of heritage assets. It emphasises the importance of heritage assets as a finite non-renewable resource. The policy recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long-term and that wherever possible heritage assets are put to an appropriate and viable use that is consistent with their conservation.

42 London Plan (policies 7.8 & 7.9): Heritage, seeks a reduction in the proportion of buildings at risk as a percentage of the total number of listed buildings in London. London Plan (policies 7.8-7.12): Historic Environment & Landscape – state that the Mayor will, and Boroughs should, give careful consideration to the relationship between new development and the historic environment, including listed buildings and archaeological areas.

43 A Statement of Significance has been compiled and accompanies this application. The statement reiterates that Fortescue House (as shown in the Figure above, sourced from the applicant’s design and access statement) is a substantial Grade II Listed Georgian Rectory set within its own extensive grounds in Hanworth. The property is located in a regeneration area where neighbouring properties are of a relatively low value.

44 The land currently associated with Fortescue House can be divided into three main elements. Firstly, there is the northern half of the main part of the land, with Fortescue House in the centre, a walled garden to the west and outbuildings to the east, the latter from historic mapping evidence grouped around the site of service yards. Secondly, the southern half of the site primarily contains the remains of the circular carriage drive overlooked by the main frontage of the house and centred on it. Finally there is a strip of land containing the approach from Park Road to the east and giving access to the circular drive and the remains of the service yards.

45 The main house comprises two components. The earlier part is represented by the formal frontage and dates back to the early 19th century. The rest of the house comprises a rear extension which principally dates from 1939 and was extended in 1975-6. The northern half of a former stable block survives and was converted to a bungalow also in 1975-6. There is a walled garden to the west of the main house and a small outbuilding to the north east. In summary, given the survival of original fabric and fittings, the original part of Fortescue House has high significance.

46 The area encompassing Fortescue House is also a Conservation Area and is centred on St George’s Church, Tudor Court (originally the stables to the former Palace) and Tudor House.
the west it extends to take in housing estates erected in the 1950’s on the site of the former moat, while to the east it includes the extreme southern end of Hanworth Park, Fortescue House and its immediate curtilage.

47 The planning statement demonstrates that a special regard has been paid to the desirability of preserving the special interest and setting of the listed buildings, and of preserving if not enhancing the character and appearance of the Conservation Area, as required under Sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

48 The appeal decision of the 2010 application set out that the very substantial bulk of the multi-purpose hall would dominate the site. In the current scheme the position of the hall has been moved back so it is behind the building and there is reduction in size. That said, further discussion with the Council as to whether the concerns raised by the Inspector have been addressed.

49 The design of the proposed building works does not seem to detract from the special interest of the house. Since the changes proposed to the main house are restoration and conservation work there would be limited detrimental impact to the Listed Building. The height of the additions has been constrained and is lower than the existing ridge of the Georgian (main) house. The location is well screened and the bulk and form would fit with the existing buildings and conservation setting. That said, subject to English Heritage advice, the applicant is asked to consider the use of traditional design and materials for the proposed extensions in order to blend in with the existing listed building.

50 In addition, the Inspector raised concerns regarding the viability of the scheme and the appeal decision set out that the heritage works should be completed prior to the opening of the school and use of the multi-purpose hall. Clarification is required on this.

Urban design

51 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. Other design polices 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 and World Heritage Sites, views, the public realm and the Blue Ribbon Network. 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).

52 The applicant has submitted a design and access statement. The proposed development is situated on an isolated site within the open space of Hanworth Park. The site is currently surrounded by heavy planting on all sides obscuring any views of any low rise development within it. Development on this site plays no role in the wider legibility or permeability of the wider area so has limited impact on the neighbourhood as a whole.
As shown in the Figure above, the heavy planting around the edges of the site will screen most of the new school buildings and prevent the development from having any significant impact on the openess, setting or character of the greenbelt so this is not a major concern.

Whilst officers have some concerns regarding the appropriateness of the contemporary design and the impact of the sports hall on the character and appearance of the listed Georgian building the views of English Heritage should be sought on this and further discussion is needed with the Council as to whether the concerns raised by the Inspector have been addressed.

In conclusion, whilst there is some concern in relation to the impact of the development on the listed building, these issues should be resolved in response to the views of English heritage and the Council, leaving no issues that present any strategic design concern to GLA.

Inclusive design

London Plan policy 7.2 'An Inclusive Environment' seeks the highest standards of accessibility and inclusion in new developments. London Plan policy 7.1 also stresses the importance of extending these inclusive design principles to the neighbourhood level by meeting Lifetime Neighbourhood criteria. This can help to ensure that the public realm, parking areas, routes to the site and links to adjacent public transport and local services and facilities are accessible, safe and convenient for everyone, particularly disabled and older people.

The design and access statement states that there are inherent physical limitations to the main house and its use by the physically impaired which cannot be overcome without drastic adaptation and structural alteration. In order to retain the historical elements and original proportions, the use of the main house would be ancillary to the teaching areas proposed in the new additions; the main house would be used for staff rooms, head teacher room(s), meeting rooms etc. Structural changes and/or adaption would therefore be unnecessary. However, it is stated that the internal divisions within the annexe would be removed and the issue of accessibility for the physically impaired addressed. The ground floor of the addition would be level to that of the annexe with an elevator servicing both floors of this addition, annexe and east wing respectively. The elevator and stairwell would be located adjacent to one another in order to avoid marginalizing the physically impaired. These changes would facilitate the creation of a number of useable rooms located on either side of a central hallway linking the Georgian House to the main accommodation to be sited towards the northeast and northwest of the annexe respectively. The additions would be designed with full consideration of the physically impaired and would not only allow 100% access for the physically impaired but would also address the current access issues to the Heritage Asset.

Although it is noted that key issues of inclusive design (levelled access, width of circulation, trade and riser of stairs steps, internal and external door openings, disabled toilets,
provision of an elevator, etc), are incorporated in the design and access statement, the applicant is advised to consult and make cross reference to Building Bulletin 102: ‘Designing for Disabled Children and Children with Special Educational Needs’.

59 The proposed scheme is compliant with the inclusive design policies of the London Plan but consideration should also be given to Building Bulletin 102.

**Sustainable development**

60 London Plan policies 5.2, 5.6 and 5.7 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.

61 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. The proposals are broadly acceptable; however, further information is required before the carbon savings can be verified.

**Climate change mitigation**

**BE LEAN**

Energy efficiency standards

62 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 energy efficiency and mechanical ventilation with heat recovery. The demand for cooling will be minimised through the use of passive shading.

63 Based on the information provided, it is not clear whether the proposed development will achieve any carbon savings from energy efficiency alone compared to a 2010 Building Regulations compliant development.

64 The applicant should model additional energy efficiency measures and commit to the development exceeding 2010 Building Regulations compliance through energy efficiency alone.

**BE CLEAN**

District heating

65 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

Combined Heat and Power (CHP)

66 The applicant has investigated the feasibility of CHP. However, due to the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.
Renewable energy technologies

67 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install ground source heat pumps to provide heating. Further information on where the vertical boreholes or heating coils will be accommodated should be provided.

OVERALL CARBON SAVINGS

68 Taking account of the comments above, the applicant should provide an estimate of regulated carbon dioxide emissions at each stage of the energy hierarchy and the associated savings.

Climate change adaptation

69 London Plan policy 5.3 Sustainable Design and Construction seeks to ensure future developments meet the highest standards of sustainable design and construction. Specific policies relate to overheating (5.9), green roofs (5.11), urban greening (5.10), flood risk (5.12) and sustainable drainage (5.13), water (5.14 and 5.15) and waste (5.17). Further guidance is provided in the London Plan Sustainable Design and Construction SPG.

70 A flood risk assessment was undertaken by the applicant (2010 application) and the site is identified as Flood Zone 1 defined by PPS25 as having a “low” probability of flooding, and therefore the risk of floods is not directly applicable. The site is also not considered to be at significant risk of flooding. However, it is stated that the risk of localised flooding would be minimised by the careful consideration and the management of the site wide drainage systems which in turn would balance the surface water storage volumes and should not impede flood flows. It is stated that the use of Sustainable Urban Drainage System (SUDS) and rain water harvesting would further reduce the burden on any watercourses. The latter would contribute significantly to the sustainable credentials of the proposed development.

Transport for London’s comments

71 A total of 26 car parking spaces are proposed to serve 25 staff and visitors to the school. This figure includes two blue badge bays. Additionally, 36 grasscrete parking spaces are proposed for event day parking (such as wedding, etc). Given the low public transport accessibility level of the area, TfL generally supports this level of parking. Although no standards are set in the London Plan for D1 land uses, TfL recommends that the developer provides electric vehicle charging points at 10% active and 10% passive ratio in to ensure provision for electric vehicles in the future. Conformity with this will ensure compliance with London Plan Policy 6.13 Parking.

72 TfL requests that the developer undertakes an audit of the pedestrian environment in the vicinity of the site, focussing in particular on routes to public transport access points. This should identify any improvements which need to be made in order to encourage trips to the site on foot. This will ensure general conformity with London Plan policies 6.9 Cycling and 6.10 Walking.

73 TfL welcomes the provision of 22 cycle spaces. Cycle spaces must be safe, covered and secure with good lighting and CCTV. Shower, locker and changing facilities should be available to all staff, pupils and visitors on site. This will ensure conformity with London Plan policy 6.9 Cycling.
Both a construction logistics plan and a delivery and servicing plan should be provided in support of the application. Both should be secured by planning conditions. This will ensure general conformity with London Plan policy 6.14 Freight.

The travel plan submitted has not been updated since June 2010 and has failed the ATTReBuTE assessment. It requires modification before it can be deemed acceptable. The travel plan must be secured, enforced, monitored, reviewed and funded through the Section 106 agreement. This will ensure conformity with London Plan policy 6.3 Assessing effects of development on transport capacity.

In summary, all car parking provided must meet London Plan electric vehicle charging points standards. TfL requests an audit of the pedestrian environment to be undertaken and a construction logistics plan and a delivery and servicing plan need to be submitted along with a revised travel plan. TfL is satisfied that these issues can be met through the appropriate planning conditions.

Local planning authority’s position

Hounslow Council officers have yet to confirm their position.

Legal considerations

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

There are no financial considerations at this stage.

Conclusion

London Plan policies on Green Belt, listed buildings and heritage, education use, design, inclusive access, sustainable development, transport and parking are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Green Belt**: The very special circumstances provided may justify the inappropriate development on Green Belt. Further discussion is required with the Council and English Heritage as to whether the benefits outweigh the harm.

- **Listed buildings and heritage**: The proposed measures in regard of preserving the special interest and setting of the listed buildings, and of preserving if not enhancing the character and appearance of the Conservation Area, are acceptable. However, traditional design and materials are recommended. The improvement works should be secured to be carried out prior to the use of the school or the hall.
- **Education use**: The proposal to meet the educational needs of children with disabilities and autistic spectrum disorder is supported. However, there are concerns regarding the size and use of the multi-purpose hall.

- **Design**: Whilst there is some concern in relation to the impact of the development on the listed building, these issues should be resolved in response to the views of English heritage and the Council, leaving no issues that present any strategic design concerns to the GLA.

- **Inclusive design**: The access arrangement and the proposed measures to meet the standards of inclusiveness are supported, and given the inherent constraints with the listed buildings the proposal, as such complies with policies 7.1 and 7.2. of the London Plan.

- **Sustainable development**: The applicant should provide an estimate of regulated carbon dioxide emissions at each stage of the energy hierarchy and the associated savings.

- **Transport**: All car parking provided must meet London Plan electric vehicle charging points standards. TfL requests an audit of the pedestrian environment to be undertaken and a construction logistics plan and a delivery and servicing plan need to be submitted along with a revised travel plan.

81 On balance, the application does not comply with the London Plan.

82 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Green Belt, listed buildings & heritage, and design**: Provide further evidence from English Heritage and engage with the Council for further discussion. Secure improvement works to the listed buildings prior to the use of the school or the hall.

- **Education use**: Engage with the Council in addressing concerns related to the use and size of the multi-purpose hall.

- **Sustainable development**: Provide an estimate of regulated carbon dioxide emissions.

- **Transport**: Provide electric vehicle charging points, audit of pedestrian movements, construction logistics plan and a delivery and servicing plan along with a revised travel plan.