

# Guru Nanak Sikh School

in the London Borough of Hillingdon

planning application no. 4450/APP/2009/622

## Strategic planning application stage II referral (new powers)

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

## The proposal

Re-development of the existing Guru Nanak Sikh School involving: construction of a three storey teaching block with Gurdwara, construction of a two storey library, single storey vocational block, addition of ten staff car parks and forty secure cycle parks.

## The applicant

The applicant is **Nanaksar Trust**, and the architect is **Integrated Design Consultants**.

## Strategic issues

The Mayor previously raised a series of strategic planning concerns in relation to; **urban design**, **climate change** adaptation and mitigation and **transport**. Following the Mayor's original comments these issues have all now been satisfactorily addressed.

## Recommendation

That Hillingdon Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal.

## Context

1 On 31 March 2009 the Mayor of London received documents from Hillingdon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under Category 3D of the Schedule to the Order 2008: "(a) development 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 floorspace of more than 1,000 square metres or a material change in the use of such a building."

2 On 29 April 2009 the Mayor considered planning report PDU/0637a/01, and subsequently advised Hillingdon Council that the application did not comply with the London Plan, for the reasons set out in paragraph 60 of the above-mentioned report; but that the possible remedies set out in paragraph 62 of that report could address these deficiencies.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised in response to the Mayor's concerns (see below). On 9 June 2009 Hillingdon Council decided that it was minded to grant planning permission, and on 26 June 2009 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged or direct Hillingdon Council under Article 6 to refuse the application. The Mayor has until 9 July 2009 to notify the Council of his decision and to issue any direction.

4 The decision on this case, and the reasons will be made available on the GLA's website [www.london.gov.uk](http://www.london.gov.uk).

## Update

5 At the consultation stage Hillingdon Council was advised that the application did not comply with the London Plan, for the reasons set out in paragraph 60 of the above-mentioned report; but that the possible remedies set out in paragraph 62 of that report could address these deficiencies:

### Urban design and effect on Green Belt

6 The key issues raised at stage I related to visual impact of the proposal on the surrounding Green Belt environment. Of particular concern was the proposed gold coloured dome structure above the Gurdwara room and also the vocational block that will lie outside the existing built footprint. In order to ensure the scheme met the London Plan design principles the applicant was asked to provide a landscape and visual assessment based on Accurate Visual Representation (AVR) methods of the proposal in its wider setting. The applicant has provided the following photomontages based on AVR and this demonstrates that the proposal will have minimal visual effects when viewed from within the surrounding Green Belt environment.

Figure 1: Pre-development when viewed from within the Green Belt to the south west (Source: Floyd Matcham landscape architects).



Figure 2: Post-development when viewed from within the Green Belt to the south west (Source: Floyd Matcham landscape architects).



Figure 3: Pre-development when viewed from within the Green Belt to the south east (Source: Floyd Matcham landscape architects).



Figure 4: Post-development when viewed from within the Green Belt to the south east (Source: Floyd Matcham landscape architects).



#### Access and inclusive design

7 At stage I the main area of concern regarding access was the proposed library building as the second floor was only accessible for disabled people by going back into the main building and crossing over the link bridge from the main building to the library due to there only being a spiral stairwell connecting the first and second floors internally. This approach was not considered inclusive particularly given the distance any wheel chair user would have to travel to access the nearest lift. It was requested that the applicant redesigned the library to either, preferably include a lift inside the library building or include a lift in the nearby stairwell to in the main building near the link bridge. In addition it was requested that fully accessible toilets were provided within the library. The applicant has redesigned the library to include both a lift and fully accessible toilet therefore resolving any outstanding access issues.

#### Climate change adaptation and mitigation

8 At stage I further information was requested regarding the energy efficiency modelling, CHP infrastructure and the renewable energy measures proposed. This information has since been provided. In addition, discussions with the applicant and Hillingdon Council have resulted in an additional planning condition being added to their consent requiring 25 sq.m. of solar thermal panels to be installed as proposed within the energy strategy. This condition is set out below.

*‘At the completion of the new buildings no less than 25 sq.m. in total of solar thermal panels shall be installed to partially supply hot water to all new buildings on the development’*

9 Therefore all outstanding issues relating to climate change adaptation and mitigation have been resolved.

## **Transport for London's comments**

10 In response to the initial referral, TfL raised no objection in principle to the proposed development, but requested that cycle parking be increased to meet TfL cycle parking standards and that improvements be made to the school travel plan. TfL suggested that potential measures to increase walking be investigated, and that a construction logistics plan and delivery & servicing plan be secured by planning condition or Section 106 agreement.

11 TfL notes that 117 cycle parking spaces are required by planning condition representing a substantial increase from the twenty spaces originally proposed and this is welcomed. TfL also notes that at least two electric vehicle charging points are required by condition and this is also supported.

12 The Section 106 agreement as outlined in the council's committee report includes requirements for a travel plan in accordance with TfL guidance, a Construction Logistics Plan and a Delivery & Servicing Plan. There does not appear to have been any further investigation into walking improvements, however TfL accepts that this could be addressed through the travel plan.

13 In conclusion, all outstanding transport issues have been resolved to TfL's satisfaction and no objection is raised to the grant of planning permission.

## **Response to consultation**

14 In response to Hillingdon Council's public consultation process, the Council received the following responses summarised below:

### Environment Agency

15 Support the application. Originally objected to the application and requested further information demonstrating how the soak away systems will work, calculations, existing and proposed run-off levels plans showing the areas draining to sewer or soak away. The objection was withdrawn in light of this information being provided.

### English Heritage

16 Support the application. English Heritage requested a archaeological works programme condition be included on the planning permission and Hillingdon Council have included an appropriate condition.

### National Air Traffic Services (NATS)

17 Support the application. NATS confirmed the proposal did not conflict with any of its safeguarding criteria.

### Natural England

18 Support the application but advised Council that further information should be requested relating to the bat survey and biodiversity enhancement measures.

### Neighbour

19 Objected to the application making the following comments:

- Over-development of the site, impacting upon the country park and the forthcoming gas works site will exacerbate this.

- Parents already leave cars in Abbotswood Way as a result of excess traffic already on Uxbridge Road and the proposal will increase this.
- Gumbad dome will look out of place and not blend into the surrounding environment.

20 The strategic issues raised have been addressed in this report and the previous Stage I report to the Mayor.

## Legal considerations

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

## Financial considerations

22 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 8/93 (*'Award of Costs in Planning and Other (including Compulsory Purchase Order) Proceedings'*) emphasises that parties usually pay their own expenses arising from an appeal.

23 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

## Conclusion

24 The proposed expansion of the existing Guru Nanak Sikh School is supported. The planning application is well considered and the scheme does not raise any outstanding strategic planning concerns.

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**Guru Nanak Sikh School**

in the London Borough of Hillingdon

planning application no. 4450/APP/2009/622

**Strategic planning application stage 1 referral (new powers)**

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

**The proposal**

Re-development of the existing Guru Nanak Sikh School involving: construction of a three storey teaching block with Gurdwara, construction of a two storey library, single storey vocational block, addition of ten staff car parks and forty secure cycle parks.

**The applicant**

The applicant is **Nanaksar Trust**, and the architect is **Integrated Design Consultants**.

**Strategic issues**

The site is located on designated **Green Belt**. The applicant has made a robust argument demonstrating that this application offers a **very special circumstance** that warrants the proposed further redevelopment on the site. Therefore the land use principle is acceptable in strategic planning policy terms.

There is **insufficient information** to determine compliance with policies relating to **climate change** adaptation and mitigation. Various matters relating to **urban design, access** and **inclusive design** also need to be addressed. Further information is requested on **transport** and scheme should be revised to meet the London Plan policies on cycling and walking.

**Recommendation**

That Hillingdon Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 60 of this report; but that the possible remedies set out in paragraph 62 of this report could address these deficiencies. The application does not need to be referred back to the Mayor if Hillingdon Council resolve to refuse permission, but it must be referred back if Hillingdon Council resolve to grant permission.

**Context**

1 On 31 March 2009, the Mayor of London received documents from Hillingdon 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 11 May 2009 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: *“(a) development 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 floorspace of more than 1,000 square metres or a material change in the use of such a building.”*

3 Once Hillingdon 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 Hillingdon 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](http://www.london.gov.uk).

## **Site description**

5 The five-hectare site is located on the southern side of Beaconsfield Road. The site is designated as Green Belt. The Hayes and Yeading United Football Club lies to the east of the site, while the remainder of the site is surrounded by undeveloped open Green Belt area, namely Minet Country Park, to the south and west.

6 The site is accessed via Springfield Road which intersects with the A4020 Uxbridge Road / The Broadway, approximately 650 metres to the north. The A4020 is part of the Strategic Road Network (SRN) and intersects with the A312 Parkway via the Ossie Garvin roundabout, approximately 300 metres west of the Springfield Road junction. There is no public transport within walking distance of the site. Three bus routes available from Uxbridge Road (routes 207, 427 and 607) but Uxbridge Road is more than 400 metres walk from the site. The site is remote from the London Underground network and the nearest railway station, Hayes & Harlington (on the Paddington to Heathrow line and the proposed Crossrail route), is well beyond acceptable walking distance. The Public Transport Accessibility Level (PTAL) of the site is 0-1a, where 6b is very high and 1a is very low.

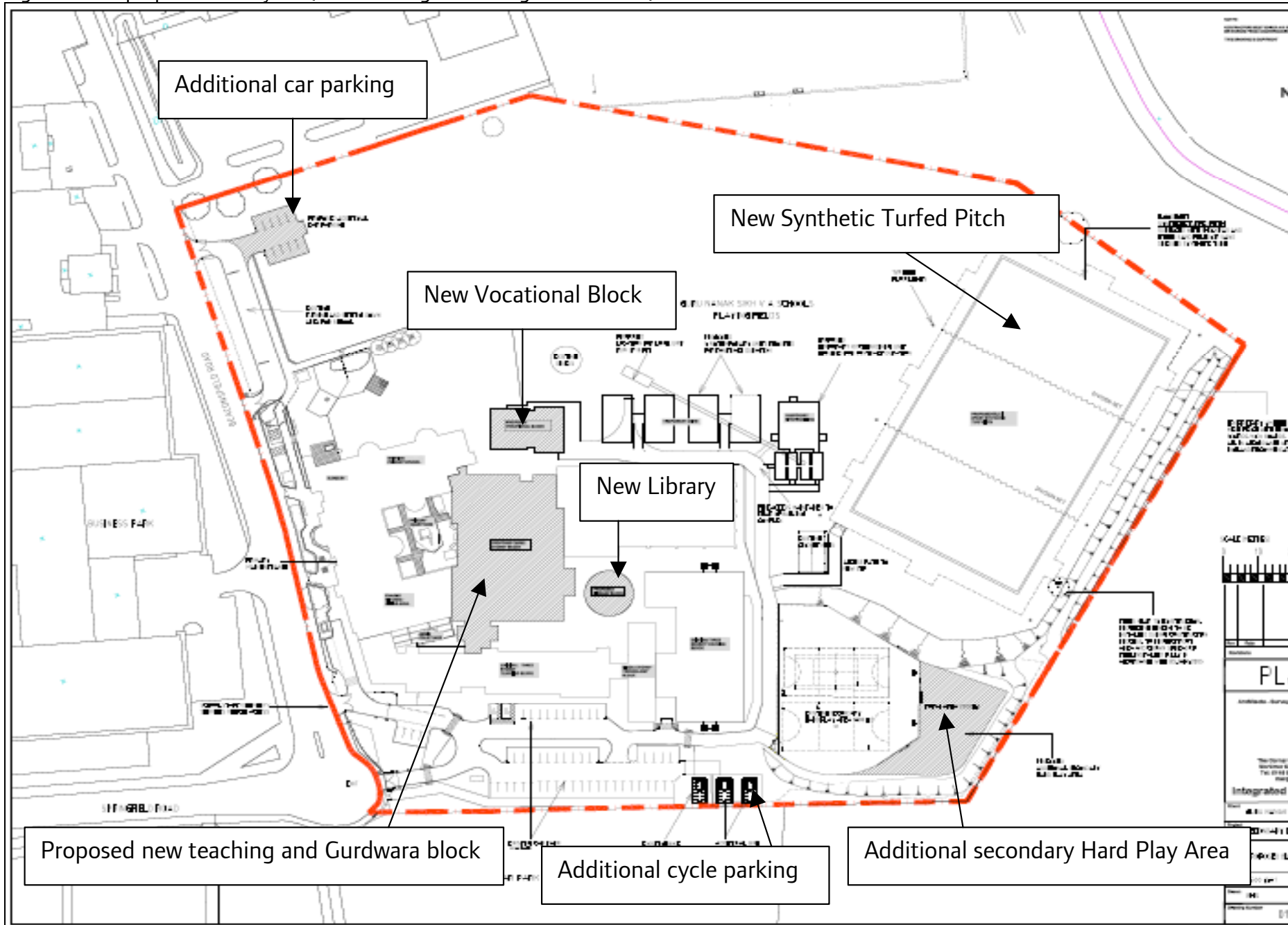
7 The site incorporates the Guru Nanak Primary and Secondary School with existing buildings on site comprising of a mix of new and refurbished buildings including a range of one to three storey teaching blocks, Gurdwara (Sikh temple), sports hall and a shared kitchen facility building. The existing car parking provides for 55 staff parking spaces and 20 secure cycle spaces.

## **Details of the proposal**

8 The proposed redevelopment seeks to provide additional Secondary School capacity through redeveloping the site as follows, and is shown in Figure 1 below;

- Demolition of the existing single storey Gurdwara, office and classroom buildings totalling approximately 800 sq.m.
- Replacement with a new 1,472 sq.m. three-storey main teaching block incorporating an extension to the existing dining room, new kitchen, and new Gurdwara on the top floor with a gumbad (dome) feature above.
- Construction of a new 154 sq.m. two-storey circular library building with an access bridge linking the new three storey main building to the library at second storey level.

Figure 1: The proposed site layout (Source: Integrated Design Consultants).





- Construction of a new 280 sq.m. single-storey Vocational Block.
- Addition of ten car parking spaces and forty secure cycle parking spaces.
- Construction of a new 6,426 sq.m. astro turf pitch including fencing and eight, fifteen metre high flood lights.
- Additional 700 sq.m. extension to the existing Secondary Hard Play Area

9 The existing buildings meet the requirements for a 4 Form entry (FE) school of 672 students (600 aged 11-16 and 72 students in the 6<sup>th</sup> form). However, the proposed increase will provide for an increase to 6FE requirements to 1170 (including 270 in the 6<sup>th</sup> form) in 2015 –2016.

10 The site currently employs 138 full time staff and this will rise to 171 as a result of the proposed expansion.

11 The additional hard surface play area will compensate for the play area lost at the centre of the site where the new three-storey building will be built. A series of temporary buildings are proposed to be located on the eastern side of the site to be used as classrooms and kitchen space during the proposed redevelopment construction phase.

## Case history

12 There is a history of redevelopment of the subject site for education purposes and the former Mayor considered the previous application (report PDU/0637/01) on 13 February 2003.

13 The proposal incorporated the erection of three storey extension to the secondary school building; extensions to adapted existing two storey block to form primary school; demolition of temporary school accommodation and site manager’s house; formation of site manager’s flat in existing two storey accommodation block; creation of new hard paved and car parking areas; formation of new accesses (Outline application: matters to be determined siting and means of access).

The former Mayor concluded that he supported the scheme in principle as through careful siting of the buildings together with the special circumstances, constituted, on balance, an acceptable development within the Green Belt that is in the best interests of planning in London.

## Strategic planning issues and relevant policies and guidance

14 The relevant issues and corresponding policies are as follows:

- Green Belt/MOL *London Plan; PPG2*
- Open land *London Plan; PPG17*
- Playing fields *London Plan; PPG17*
- Urban design *London Plan; PPS1*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Wheelchair Accessible Housing BPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Equal opportunities *London Plan; Planning for Equality and Diversity in Meeting the spatial needs of London’s diverse communities SPG; Diversity and Equality in Planning: A good practice guide (ODPM)*
- Sustainable development *London Plan; PPS1, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor’s Energy Strategy; Sustainable Design and Construction SPG*

- Transport *London Plan; the Mayor's Transport Strategy; PPG13*
- 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 1998 Hillingdon Unitary Development Plan (saved policies) and the London Plan (Consolidated with Alterations since 2004). The Hillingdon preferred options core strategy and site allocation documents are relevant material considerations.

## **Green Belt and the principle of the development**

16 The application site is designated as Green Belt. Policy 3D.9 (*'Green Belt'*) 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 encroaches 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.

### 'Very special circumstances'

17 London Plan policy 3D.9 'Green Belt' notes that the protection of London's Green Belt should be maintained and that proposals for alterations to Green Belt boundaries should be considered through the DPD process in accordance with government guidance in 'Planning Policy Guidance 2: Green Belts' PPG2. It also notes that *"there is a general presumption against inappropriate development in the Green Belt, and such development should not be approved except in very special circumstances. The Mayor will and boroughs should encourage positive uses for the Green Belt that realise the potential to improve the environmental and landscape quality and accessibility of the land while meeting its statutory purposes"*.

18 PPG2 sets out that some uses for *"essential facilities"* such as for outdoor sport and outdoor recreation may be appropriate, but that these uses should *"preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it"* and that they should not *"have an adverse impact on the openness of the Green Belt"*. However, the redevelopment of this part of the site for educational uses is not considered appropriate within the Green Belt and PPG2 sets out that inappropriate development will only be allowed where it is justified by *"very special circumstances"*. The applicant has made an argument that very special circumstances apply in this instance to justify the inappropriateness of the development. The main points of this 'very special circumstances' argument are set out below:

### Educational use

19 The existing buildings meet the requirements for a 4 form entry (FE) school of 672 students (600 aged 11-16 and 72 students in the 6<sup>th</sup> form). However, the proposed increase will provide for an increase to 6FE requirements to 1170 students (including 270 in the 6<sup>th</sup> form) by 2015 -2016. The applicant states that the school is popular and very successful, in March 2008 Ofsted Inspectors classed the school as 'outstanding' Grade 1 across every category. In addition, the applicant states that the academic results have also been outstanding with a GCE A level pass rate of over 97% with 40% passed at grade A or B. The applicant states that as a result of the schools outstanding results there is a continued demand for places and that at sixth form level between 2005 and 2007, the school was over subscribed between 49% and 60% and there is an anticipated growing demand for sixth form places and the remainder of the school was oversubscribed on average by 196% over the last 5 years. Furthermore, the Guru Nanak Sikh Primary School (on the same site), Slough Khalsa Primary School and the Southall Khalsa Primary School have a combined output of 6FE of students with only the current 4FE capacity at the Guru Nanak Secondary School to accommodate

the demand. Therefore, it has been clearly demonstrated that there is a need for the provision of additional capacity at the Guru Nanak School in order to fulfil the increasing local demand for the Sikh faith based secondary school provision.

#### Building footprint and volume impact within the Green Belt

20 The new three-storey block will be located on the site of the existing single-storey buildings comprising offices, stores, classrooms, Gurdwara, and linking corridors right at the centre of the site and between existing and retained buildings. PPG2 states *'the construction of new buildings inside a Green Belt is inappropriate unless it is for the following purposes: ...limited extension, alteration or replacement of existing dwellings (subject to paragraph 3.6 below).'* Paragraph 3.6 caveats this stating: *'Provided that it does not result in disproportionate additions over and above the size of the original building'*.

21 The main building results in an increase of two storeys from one storey to three storeys, and increases in floor space from 4,906 sq.m. within the existing building to 9,620 sq.m. in the proposed. This in itself is disproportionate to the original building and therefore inappropriate. However, the overall impact of the new building is not considered to be a disproportionate addition when viewed in context with the surrounding school buildings. The bulk of the new three-storey building will not be excessive nor will it be higher than the existing three storey blocks on the site, apart from the proposed dome to the Gurdwara on top of the new block. The applicant states the dome forms an important and integral part of the religious significance of the Gurdwara in Sikh religion and the location directly above the Gurdwara room on the top floor is required as the dome must crown the Gurdwara and also must be gold. Part of its purpose is to ensure that the local Sikh community is aware of the location of the Gurdwara. Therefore, the dome forms a significant and very important part of the overall ethos of the Guru Nanak School.

22 While the religious significance is noted, given the prominent positioning and bright gold colour it is important that any effects on the highly sensitive green belt surroundings are sufficiently addressed. The visual impact assessment only provides existing view corridor images but no images once the new development has been erected. In order to fully assess the potential impacts on the openness of the Green Belt, it is requested the applicant provides further images with the new buildings imposed into the photomontages.

23 The circular library building will be located within the central courtyard again on an area of developed site and surrounded by taller buildings therefore it will not be visible from outside of the site.

24 The vocational block does not replace any existing buildings and is also inappropriate in principle for the purposes of PPG2. However, the applicant has set out its consideration of whether this causes any additional harm to the Green Belt.

25 The block is a small single storey building located close to the rear of the three storey block. Whilst this new building will project marginally beyond the line of the existing Primary School buildings, the applicant states that due to the proximity to the existing and proposed buildings and the small scale of the building will ensure that it is seen as part of the overall complex rather than as extending out into the Green Belt. It is positioned so it is shielded from sight when viewed from the open landscape of Minet Country Park. The applicant has provided the additional justification to support the positioning of the vocational block within the green belt outside of the existing built foot print;

- The Vocational Block will have community use from time to time that requires non-school members coming onto the site. Therefore, the applicant considers that it is better to be set slightly apart from the main school buildings.

- The car hoists require a greater height than normal which make it impossible to fit in with the new three storey block with its usual floor to floor dimensions.
- The building will also be noisy at times and because of its proposed use for teaching motor vehicle engineering is better located slightly away from the main school for safety reasons.
- The unit also needs easy access for vehicles from the end of the fire track road.

26 Therefore adequate justification has been provided and given its small size (approximately 280 sq.m.) and positioning it is not considered it will not result in any significant impact on either the openness or the character of the Green Belt in this location.

27 The four temporary units at the rear of the sports hall plus the temporary dining/kitchen facility will only be in place during the demolition of the existing buildings and the construction of the new buildings proposed and therefore will not have any lasting impacts on the Green Belt.

28 The new synthetic turfed pitch will be located on the school playing fields directly adjacent to the southern boundary of the site and surrounded by 4m high Weldmesh fencing and eight, fifteen metre high flood lights. Although the fencing and the lighting columns will be visible from the surrounding Green Belt area they will be bordering the Goals Soccer Centre and the flood lit pitches of the nearby football club grounds and will no be seen as being out of character in the surrounding area. They will therefore result in no permanent detrimental impact on the openness or character and the appearance of the Green Belt.

29 The applicant proposes a comprehensive landscaping scheme that will significantly soften the site boundaries to the south and west towards the Minet Country Park and any effectively mitigate any potential effect of the proposed redevelopment and therefore improving the environmental and landscape quality as required by London Plan Policy 3D.9 'Green Belt'.

### Summary

30 The applicant has adequately demonstrated that there are 'very special circumstances' to allow this inappropriate development to take place within the Green Belt as required by PPG2, therefore the principle of the proposed development is accepted. However, in order to fully assess the impact of the replacement building on the Green Belt, further information is requested.

### **Community facility**

31 London Plan Policies 3A.17 ('Addressing the needs of London's diverse population') and 3A.18 ('Protection and enhancement of social infrastructure and community facilities') of the London Plan seek to identify and address the needs of London's diverse population, providing social infrastructure and community facilities wherever possible. The Mayor's 'Planning for equality and diversity in London SPG' encourages local authorities to identify significant clusters of faith groups and identify sites that will encourage suitable places of worship. The SPG also states "In identifying suitable sites, public transport accessibility should be an important factor (as a central criterion in a 'sequential approach'), although it is recognised that good public transport accessibility may not always be possible due to the limited availability of suitable sites. In any case, the implementation of a green travel plan will minimise the impacts of these facilities on the local area."

32 As detailed above the applicant has provided sufficient evidence of the student capacity demand shortfall the existing school is experiencing and the demand for further expansion of the existing school. The transport assessment submitted with the application concludes that the school is accessible by non-car modes of transport and that the local junctions will continue to

operate within capacity after the extension of the school. In addition, the School Travel Plan provided commits the school to encouraging sustainable transport.

33 The overall principle of the proposed development is consistent with London Plan Policies 3A.17 (*Addressing the needs of London’s diverse population*) and 3A.18 (*Protection and enhancement of social infrastructure and community facilities*).

## Urban design

34 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. In addition to Chapter 4B, London Plan policy relating to sustainable design and construction 4A.3 (*Sustainable design and construction*) is also relevant. Design policies in the London Plan include specific design requirements relating to maximising the potential of sites, built heritage and views.

Figure 2: Aerial view of proposed building as viewed from north. (Source: Integrated Design Consultants).

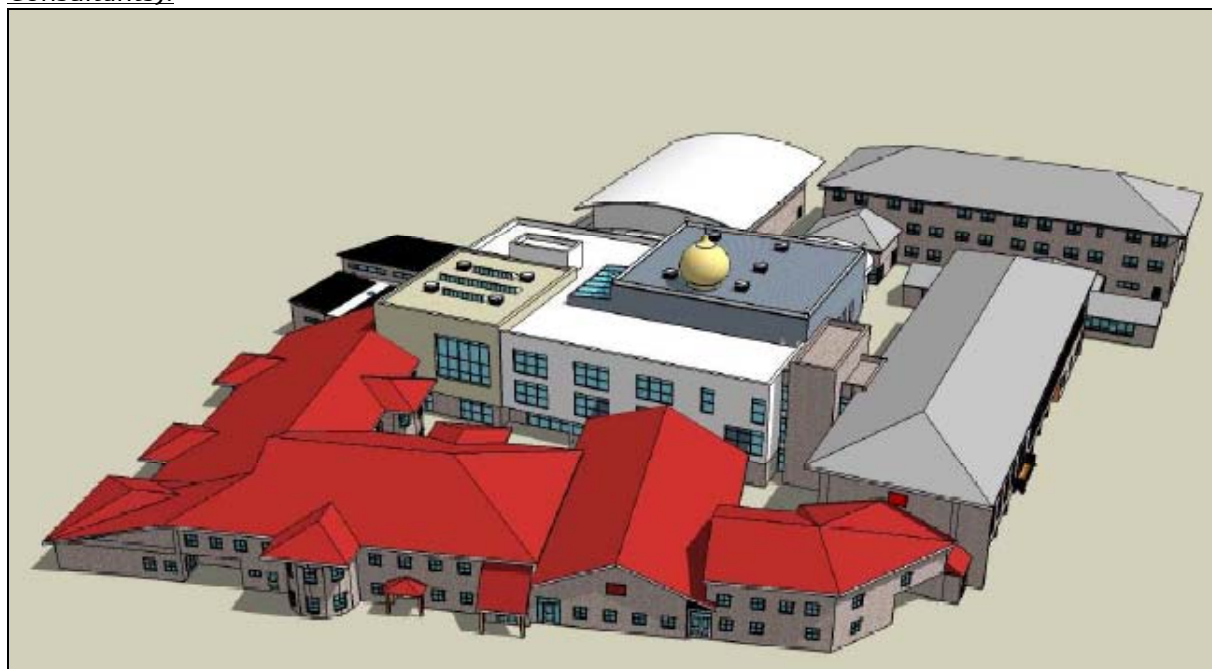


Figure 3: Proposed building as viewed from the south in Green Belt. (Source: Integrated Design Consultants).



35 Given the sensitivity of the location, any proposal should be exemplar in its response to context, design quality including robust and high quality materials, inclusive design, and sustainable design and construction. The scale and overall massing of the three-storey block is

appropriate and largely shielded from view by surrounding buildings. The design is a simple, modernist rectangular cube and integrates well with the surrounding buildings. The new library will be a two-storey rotunda is located within the sheltered central courtyard, surrounded by existing buildings and is well shielded from view from all angles. The new Vocational block again is of modern design, it is positioned outside of the existing built footprint but as detailed earlier in this report, justification has been provided for its chosen location. In addition, the darker less intrusive colour scheme is appreciated given its sensitive surroundings.

36 The approach to the roofs of each of the three new buildings should be reconsidered. In accordance with London Plan Policy 4A.11 (*Living Roofs and Walls*), Green Roofs be introduced to minimise the visual impact of the building and to enhance the contribution of the scheme in terms of biodiversity.

37 The passive design measures, including provisions for natural day lighting and ventilation via the large atrium through the centre of the three-storey building, and the skylight windows in the Vocational block are welcomed. It is unclear whether provisions for improving water efficiency and use, such as grey water systems or sustainable drainage have been incorporated. Further information should be provided to ensure the scheme meets the highest standards of sustainable design and construction. The proposal incorporates an increase in the amount of hard standing on the site over the existing; whilst this is disappointing it is requested that permeable paving be incorporated where possible.

38 The applicant has not submitted a landscape and visual assessment based on Accurate Visual Representation of the proposal in its wider setting. In order to fully assess the potential impacts of the proposed buildings on the surrounding environment, it is requested the applicant provides this assessment. The landscaping plan should be revised as necessary in light of this assessment to ensure that sufficient landscaping is proposed within the required areas.

39 The proposal does not comply with the design policies of the London Plan, particularly 4B.3 (*Enhancing the quality of the public realm*), 4A.11 (*Living Roofs and Walls*). In order to address these concerns, it is requested the applicant provides photomontages of the proposed development within the surrounding context and also incorporates green roofs for all new buildings.

## **Access and inclusive design**

40 Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all peoples, including older people, people with disabilities, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan policy 4B.5 (*Creating an inclusive environment*) is to ensure that proposals achieve the highest standards of accessibility and inclusion, not just the minimum as required by building regulations. The design of the landscaping and the public realm is crucial to how inclusive the development is to many people.

41 The access statement provided states that all new buildings will be fully compliant with Approved Document 'M' wherever there is no conflict with other requirements considered of greater importance such as Approved Document 'B' or other issues of safety. The applicant states level thresholds will be provided to all external doors with level approach from the boundary of the designated parking spaces for disabled people, hazard or tactile paving will be used to indicate any evident dangers and at all crossover points. All access ways including the door and hallway widths will be compliant. Weather protected and clearly signed main accessible entrances with automatic doors will be used aim. A full eight person disabled lift will provide access to upper storeys within the main building with disabled wheelchair facilities on each of the new three storey teaching

block. And all switches, outlets and controls will be located and chosen for ease of operation and visibility. Switches and controls will be set at 1200mm above Final Floor Level, sockets etc will be set at 400mm above Final Floor Level.

42 The inclusive building design measures are welcomed however, an area of concern is the library, it appears that the second floor is only accessible by going back into the main building and crossing over the link bridge from the main building to the library due to only a spiral stairwell connecting the first and second floors. This approach is not considered inclusive particularly given the distance any wheel chair user would have to travel to access the nearest lift. It is requested the applicant redesigns the library to either, preferably include a lift inside the library building or include a lift in the nearby stairwell to in the main building near the link bridge. Furthermore, it appears no fully accessible toilets are provided within the library and this issue also needs to be addressed.

43 In summary, the proposed inclusive design measures are welcomed. However, further information as detailed above is required before it can be fully assessed against London Plan policy 4B.5 ('Creating an inclusive environment').

## **Climate change adaptation and mitigation**

44 The London Plan Policy 4A.1 (*'Tackling climate change'*) requires development to make the fullest contribution to the mitigation of and adaptation to climate change to minimise carbon dioxide emissions. It sets out a series of policies to help ensure that London can achieve its CO2 reduction targets in Policy 4A.2 (*'Mitigating climate change'*)

### Baseline emissions and energy efficiency

45 In order to estimate the baseline emissions, the applicant has used CIBSE benchmarks. Although the applicant claims that these benchmarks are based on Building Regulations 2006, given that it appears enough information is known about the buildings' design, the applicant is requested to calculate the baseline emissions using SBEM or other building regulations approved software. The baseline emissions should be representative of a Building Regulations 2006 compliant account for unregulated energy usages. A series of energy efficiency design measures have been proposed and estimated to save carbon emissions by a 18% beyond the baseline case scenario. Energy efficient design measures include more stringent U-values and air tightness standards than those set-up by building regulations 2006 and energy efficient lighting and lighting controls.

46 The carbon savings obtained as a result of the energy efficient design measures should be supported with the results of building regulations approved modelling, i.e. SBEM or other approved software should be used to demonstrate that the energy efficient design measures proposed achieved carbon savings beyond Building Regulation 2006 minimum requirements.

### Heating infrastructure and CHP

47 The applicant proposes to install micro-CHP unit/s to supply electricity and heating to the smaller buildings. The applicant is requested to provide further information;

- State how many micro CHP units are being proposed.
- The size of the unit/s that would be installed as well as how the proposed unit/s size relates to the heating requirements of the building/s to which they would serve?

- How the micro CHP unit would be integrated with the ground source heat pump proposed, for instance, would the micro CHP units provide domestic hot water only or also space heating?

### Renewable Energy

48 The applicant proposes to use solar thermal collectors for hot water generation and in addition, ground source heat pump systems are being proposed to provide heating to the new three-storey block and possibly the LRC building. The savings achieved via the use of the proposed renewable technologies have been calculated in terms of energy consumption. Instead, the applicant should calculate the savings in carbon dioxide emissions bearing in mind that the London Plan requires a 20% reduction. In addition, the applicant needs to provide the following further information in relation to renewable energy;

- For the solar thermal option, drawings showing where the solar thermal collectors will be installed need to be provided.
- Clarify which buildings will be supplied with solar thermal energy.
- With regards to the ground source heat pumps, the applicant needs to give consideration to the following:
  - Type of system being proposed, close or open loop system?
  - Would the ground source heat pump provide only heating or heating and cooling?
  - Which percentage of the space heating requirements the ground source heat pumps will be able to provide? This will have to consider the space available for the installation of boreholes as well as the fact that different energy yields might be obtained depending on whether the ground source heat pump does only heating or heating and cooling. Assumptions about ground conductivity and suitable separation between the boreholes will need to be considered as part of the analysis.

49 In summary, the applicant needs to provide further information before the proposals can be considered acceptable and assessed against London Plan climate change and energy policies.

### **Transport**

50 The development proposals will extend the existing school to provide a net increase of 313 students and approximately 43 staff. It is proposed that the on-site car parking be increased from 55 to 65 spaces including 2 disabled spaces. TfL generally resists proposals to increase on-site car parking, but accepts that in this case the public transport accessibility is very poor and the ratio of parking to staff would actually decrease overall as a result of the development proposals (from 1 space per 2 staff currently, to 1 space per 2.5 staff). Therefore the proposed development is not contrary to London Plan Policy 3C.23 *Parking strategy*.

51 There are currently 20 secure, covered cycle parking spaces provided on site. The transport assessment states that this is sufficient to meet demand as only 1% of students currently cycle to school. No additional cycle parking is included as part of the proposed development but it is stated that additional spaces could be provided if there is found to be increased demand. TfL does not accept this argument. Cycling should actively be encouraged, for both staff and students, and the provision of plentiful, high quality cycle parking is essential to achieving an increase in cycling. It is even possible that there may be suppressed demand due to insufficient cycle parking at present, particularly for staff and secondary students. The poor public transport accessibility of the site makes cycling an even more important sustainable transport option, and every effort should be



made to encourage people to cycle to school. The school travel plan can be used to develop measures which will lead to a greater take-up of cycling by both staff and students. If the number of car parking spaces are being increased in line with the increase in staff and students, then cycle parking should also be increased accordingly. Cycle parking for the whole site needs to be provided in accordance with the TfL cycle parking standards, which require a minimum of 1 space per 10 staff or students. This will ensure compliance with London Plan Policy 3C.22 *Improving conditions for cycling*.

52 It is disappointing that the planning application does not propose measures to encourage walking to and from the school. These measures could include improvements to the A312 subway, the footpaths across Minet Country Park, or nearby pedestrian crossings. TfL recommends that the applicant investigate potential pedestrian improvements in the vicinity of the site, in order to comply with London Plan Policy 3C.21 *Improving conditions for walking*.

53 The transport assessment estimates that the proposed development will generate up to 155 additional car trips to and from the school in the peak hours. The trip generation assessment is based on a travel patterns survey of the school in 2005, which is too old and should be updated. There is also no evidence within the traffic modelling that it has been prepared in accordance with TfL's modelling guidelines. However due to the distance of the site from the strategic road networks, TfL considers that any impacts from the additional traffic will be minor. Therefore the proposed development complies with London Plan Policy 3C.17 *Tackling congestion and reducing traffic*.

54 The school travel plan requires further work in order for it to be acceptable. The plan appears to be based on old data, and is missing SMART targets. New surveys and consultation are needed. There is no evidence that the school has been engaged in the drafting of the travel plan. For the travel plan to be effective, the existing staff and students need to be engaged to ensure that the plan accurately reflects the school background and to ensure ownership and commitment to the plan. Improving the travel plan to address the above points will help to meet London Plan Policy 3C.2 *Matching development to transport capacity*.

55 A construction logistics plan and delivery & servicing plan should be secured through the Section 106 agreement, in order to comply with London Plan Policy 3C.25 *Freight strategy*.

56 In summary, TfL has no objection in principle to the proposed development, but requests that cycle parking be increased to meet TfL cycle parking standards and the school travel plan requires improvement. Potential measures to increase walking should be investigated, and a construction logistics plan and delivery & servicing plan should be secured by planning condition or Section 106 agreement.

### **Local planning authority's position**

57 The view of the local planning authority is not known at the time of writing of this report.

### **Legal considerations**

58 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

59 There are no financial considerations at this stage.

## Conclusion

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

- **Green Belt:** The proposal constitute inappropriate development on Green Belt, but have been justified through robust 'very special circumstances' as required by PPG2. As such the proposals comply with London Plan policy 3D.9 relating to the Green Belt.
- **Community Facility:** The proposal complies with London Plan Policies 3A.17 (*'Addressing the needs of London's diverse population'*) and 3A.18 (*'Protection and enhancement of social infrastructure and community facilities'*).
- **Access and inclusive design:** The access arrangement of the proposed library do not encourage or support inclusive design, which is contrary to London Plan policy 4B.5 (*'Creating an inclusive environment'*).
- **Urban design:** Further detail is required regarding the visual assessment provided to allow assessment against London Plan policy 4B.3 (*'Enhancing the quality of the public realm'*). In addition, it is requested green roofs are incorporated into the proposal in accordance with London Plan Policy 4A.11 (*'Living Roofs and Walls'*). Therefore further information and amendments are required before the application can be considered to comply with London Plan design policies.
- **Climate change mitigation and adaptation:** Further information is required regarding the energy efficiency modeling, CHP infrastructure and the renewable energy measures proposed before the application can be considered to comply with London Plan policy 4A.3 (*'Sustainable design and construction'*).
- **Transport:** The proposed increase car parking provision is not contrary to London Plan policy 3C.23 in this instance, however, the scheme is contrary to policies and 3C.21 and 3C.22 on improving conditions for walking and cycling. The transport assessment and travel plan require further work to be consistent with policies 3C.17 and 3C.2 respectively. A construction logistics plan and delivery & servicing plan is also required as part of any section 106 agreement.

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

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

- **Urban design:** The applicant is requested to incorporate green roofs into the proposal and supply the further information as detailed in paragraphs 34 - 39 above.
- **Access and inclusive design:** The applicant is requested to address and rectify the access deficiencies identified in paragraphs 40-43 above as part of the proposal.

- **Climate change mitigation and adaptation:** The applicant is requested to provide further information regarding the proposed energy efficiency measures as identified in paragraph 44-49above.
- **Transport:** The applicant should revise the scheme to support London Plan policies on cycling and walking including additional secure cycle parking and investigate opportunities to enhance pedestrian routes. The transport assessment and travel plan should be revised in line with the comments in the transport section of this report. A construction logistics plan and delivery & servicing plan should be secured as part of any planning permission.

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