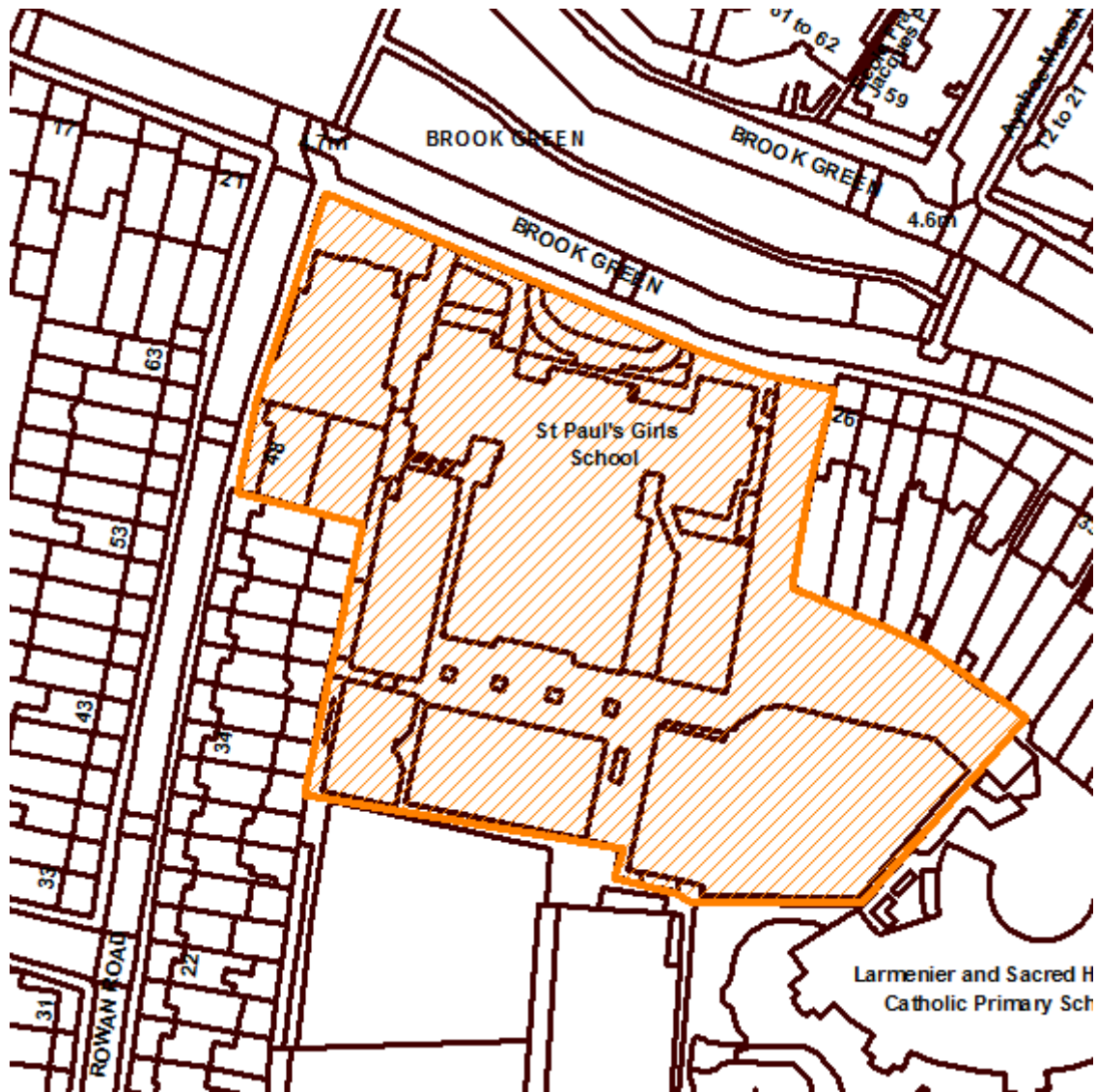

Ward: Avonmore And Brook Green

Site Address:

St Pauls Girls School Brook Green London W6 7BS



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Hammersmith and Fulham LA100019223 (2013).
For identification purposes only - do not scale.

Reg. No:
2020/01524/FUL

Case Officer:
Sian Brown

Date Valid:
16.06.2020

Conservation Area:
Brook Green Conservation Area - Number 3

Committee Date:
28.09.2020

Applicant:

St Pauls Girls School
C/O Agent

Description:

Demolition of the existing Rosalind Franklin Building (excluding boiler house arch and chimney) and erection of a new two storey Centre for Design and Innovation (CDI) adjacent to the retained boundary wall and new fencing to the rear of properties on Rowan Road; excavation to extend the CDI to the west; erection of a glazed link between the CDI and the Mercers Building to the south; refurbishment of the Mercers Building including removal of the fire escape stair and introduction of new overhead door; demolition of the existing Forum Building (excluding screen to science courtyard) and erection of a new three storey Staff Hub and link with the Main Building; enclosure of spaces between the Main Building and the Staff Hub and CDI buildings by erection of covered links; installation of solar photovoltaic panels and replacement of existing plant screen to the roof of the Celia Johnson building; landscaping of the car park including changes to the entrance gates and the erection of a new single storey maintenance building in the southeast corner of the car park; reconfiguration of some spaces in the Main Building over lower ground, upper ground and first floor for administration spaces, meeting spaces, pastoral spaces and toilet and locker space; landscaping works to the science courtyard and other associated works.

Drg Nos: See condition 2

Application Type:

Full Detailed Planning Application

Officer Recommendation:

That the Chief Planning Officer be authorised to grant planning permission upon the completion of a satisfactory legal agreement and subject to the conditions listed below.

That the Chief Planning Officer after consultation with the Head of Law and the Chair of the Planning and Development Control Committee be authorised to make any minor changes to the proposed Heads of Terms of the legal agreement or conditions, which may include the variation, addition or deletion of conditions, any such changes shall be within their discretion.

- 1) The development hereby permitted shall not commence later than the expiration of 3 years beginning with the date of this planning permission.

Condition required to be imposed by section 91(1) (a) of the Town and Country Planning Act 1990 (as amended by section 51 of the Planning and Compulsory Purchase Act 2004).

- 2) Approved Drawings

The development shall be carried out and completed in accordance with the following approved drawings:

Demolition plans:

2955-JWA-ZZ-0L-DR-A-1030 P02; 2955-JWA-ZZ-00-DR-A-1031 P02; 2955-JWA-ZZ-01-DR-A-1032 P02; 2955-JWA-ZZ-02-DR-A-1033 P02; 2955-JWA-ZZ-RF-DR-A-1034 P01; 2955-JWA-ZZ-ZZ-DR-A-3040 P01; 2955-JWA-ZZ-ZZ-DR-A-3041 P01; 2955-JWA-ZZ-ZZ-DR-A-3042 P01; 2955-JWA-ZZ-ZZ-DR-A-3043 P01; 2955-JWA-ZZ-ZZ-DR-A-3044 P01; 2955-JWA-ZZ-ZZ-DR-A-3045 P01; 2955-JWA-ZZ-ZZ-DR-A-3046 P01; 2955-JWA-ZZ-ZZ-DR-A-3047 P01; 2955-JWA-ZZ-ZZ-DR-A-3048 P02; 2955-JWA-ZZ-ZZ-DR-A-3049 P01; 2955-JWA-ZZ-ZZ-DR-A-3050 P01; 2955-JWA-ZZ-ZZ-DR-A-3051 P01; 2955-JWA-ZZ-ZZ-DR-A-3052 P01; 2955-JWA-ZZ-ZZ-DR-A-3053 P01; 2955-JWA-ZZ-ZZ-DR-A-3054 P01; 2955-JWA-ZZ-ZZ-DR-A-3055 P01

Proposed Site plan:

2955-JWA-ZZ-00-DR-A-0021 P02

Proposed floor plans:

2955-JWA-ZZ-0L-DR-A-1040 P02; 2955-JWA-ZZ-00-DR-A-1041 P02; 2955-JWA-ZZ-01-DR-A-1042 P02; 2955-JWA-ZZ-02-DR-A-1043 P02; 2955-JWA-ZZ-RF-DR-A-1044 P01; 2955-JWA-ZZ-ZZ-DR-A-1050 P02

Proposed roof plans:

2955-JWA-ZZ-RF-DR-A-1044 P01

Proposed elevations:

2955-JWA-ZZ-ZZ-DR-A-3060 P01; 2955-JWA-ZZ-ZZ-DR-A-3062 P01; 2955-JWA-ZZ-ZZ-DR-A-3063 P01; 2955-JWA-ZZ-ZZ-DR-A-3065 P01; 2955-JWA-ZZ-ZZ-DR-A-3066 P01; 2955-JWA-ZZ-ZZ-DR-A-3068 P02; 2955-JWA-ZZ-ZZ-DR-A-3070 P01; 2955-JWA-ZZ-ZZ-DR-A-3071 P01; 2955-JWA-ZZ-ZZ-DR-A-3072 P01; 2955-JWA-ZZ-ZZ-DR-A-3073 P01; 2955-JWA-ZZ-ZZ-DR-A-3074 P01; 2955-JWA-ZZ-ZZ-DR-A-3075 P01; 2955-JWA-ZZ-ZZ-DR-A-3080 P04

Proposed site sections and levels:

2955-JWA-ZZ-ZZ-DR-A-3061 P01; 2955-JWA-ZZ-ZZ-DR-A-3064 P01; 2955-JWA-ZZ-ZZ-DR-A-3067 P01; 2955-JWA-ZZ-ZZ-DR-A-3069 P01

Details of landscaping/car park:

5242-OOB-ZZ-00-DR-L-0001 P06; 5242-OOB-ZZ-00-DR-L-0003 P10; 5242-OOB-ZZ-00-DR-L-0004 P05; 5242-OOB-ZZ-00-DR-L-0010 P05; 5242-OOB-ZZ-00-DR-L-0030 P05; 5242-OOB-ZZ-00-DR-L-0043 P06; 5242-OOB-ZZ-00-DR-L-0044 P03; 5242-OOB-ZZ-ZZ-DR-L-0016 P01; 5242-OOB-ZZ-ZZ-DR-L-0017 P02

In order to ensure full compliance with the planning application hereby approved and to prevent harm arising through deviations from the approved plans, in accordance with Policies DC1, DC2, DC4, and DC8 of the Local Plan (2018).

3) Phasing Programme

No works shall take place until a plan showing the location of all Phases and the programme of phasing, including any sub-phases of development has been submitted to and approved by the Local Planning Authority. The development of

each phase shall be carried out in accordance with the approved plan for that phase, unless otherwise agreed in writing by the local planning authority.

In order to ensure full compliance with the planning application hereby approved and to prevent harm arising through deviations from the approved plans, in accordance with Policies DC1, DC2, DC4, DC8, CC11 and CC13 of the Local Plan (2018).

4) Hoarding

No development shall commence until a scheme for temporary fencing and/or enclosure of the site, including details of a painted timber site hoarding, has been submitted to and approved in writing by the Local Planning Authority, and the temporary fencing and/or enclosure has been erected in accordance with the approved details. The temporary fencing and/or enclosure shall thereafter be retained for the duration of the demolition and building works in accordance with the approved details. No part of the temporary fencing and/or enclosure of the site shall be used for the display of advertisement hoardings, unless consent has been obtained from the Local Planning Authority.

To ensure a satisfactory external appearance and to prevent harm to the street scene, the setting of the listed buildings and the character and appearance of the Conservation Area, in accordance with Policies 7.1 and 7.6 of the London Plan (2016) and Policies DC1 and DC8 of the Local Plan (2018).

5) Use

The development hereby permitted shall only be used in connection with the continued use of the premises as a secondary school, and for no other purpose (including any other separate purpose in Class F1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987, as amended, (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).

In granting this permission, the Council has had regard to the special circumstances of the case. Certain other uses within the same use class may be unacceptable due to effect on residential amenity or traffic generation, in accordance with Policies HO11 and T1 of the Local Plan (2018).

6) Capacity

The number of children enrolled and accommodated at the school shall not exceed 800 (full time equivalent) at any one time.

The increase in pupil capacity could raise materially different considerations which the Council would wish to have an opportunity to consider at that time, in accordance with Policies DC2, DC4, T1, T2, CC11 and CC13 of the Local Plan (2018).

7) Demolition and Construction Management Plan

The development shall only be carried out in accordance with the Demolition & Construction Management Plan, dated May 2020, by Blue Sky Building hereby approved. Approved management details for each relevant Phase, or part thereof shall be implemented throughout the project period.

To ensure that occupiers of surrounding premises are not adversely affected by noise, vibration, dust, lighting or other emissions from the building site in accordance with Policies 5.18, 5.19, 5.20, 5.21 and 5.22 of the London Plan (2016) and Policies DC2, DC4, CC10, CC11, CC12 and CC13 of the Local Plan (2018).

8) Demolition and Construction Logistics Plan

Prior to the commencement of each development phase hereby permitted (excluding Enabling Works) a Demolition and Construction Logistics Plan in accordance with Transport for London Guidance shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London) for that phase. The plan should include the details for all the relevant foundations, basement and ground floor structures or for any other structures below ground level including piling (temporary and permanent). The development shall be carried out in accordance with the approved Construction Logistics Management Plan.

To ensure that appropriate steps are taken to limit the impact of the proposed construction works on the operation of the public highway, that the amenity of occupiers of surrounding premises is not adversely affected by noise, vibration, dust, lighting or other emissions from the building site and to preserve the setting of the Listed Building and character and appearance of the Conservation Area in accordance with Policies 5.18, 5.19, 5.20, 5.21 and 5.22 of the London Plan (2016) and Policies DC2, DC4, DC8, T1, T2, T6, T7, CC6, CC7, CC10, CC11 and CC12 of the Local Plan (2018).

9) Contamination: Preliminary Risk Assessment

No development shall commence until a preliminary risk assessment report, in connection with land contamination, is submitted to and approved in writing by the Local Planning Authority. This report shall comprise: a desktop study which identifies all current and previous uses at the site and surrounding area as well as the potential contaminants associated with those uses; a site reconnaissance; and a conceptual model indicating potential pollutant linkages between sources, pathways and receptors, including those in the surrounding area and those planned at the site; and a qualitative risk assessment of any potentially unacceptable risks arising from the identified pollutant linkages to human health, controlled waters and the wider environment including ecological receptors and building materials; and a statement of whether a site investigation is necessary to address these potentially unacceptable risks. All works must be carried out in compliance with the approved details and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. The condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, and in accordance with Policies CC9 and CC13 of the Local Plan (2018) and SPD (2018) Key Principles LC1 to LC7.

10) Contamination: Site Investigation Scheme

No development shall commence until a site investigation scheme, if a site investigation is to be required under the approved preliminary risk assessment, is submitted to and approved in writing by the Local Planning Authority. This scheme shall be based upon and target the risks identified in the approved preliminary risk assessment and shall provide provisions for, where relevant, the sampling of soil, soil vapour, ground gas, surface and groundwater. The site investigation should then progress in accordance with the agreed site investigation scheme. All works must be carried out in compliance with the approved details and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. The condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, and in accordance with Policies CC9 and CC13 of the Local Plan (2018) and SPD (2018) Key Principles LC1 to LC7.

11) Contamination: Quantitative Risk Assessment

Unless the Local Planning Authority agree in writing that a set extent of development must commence to enable compliance with this condition, no development shall commence until, following the site investigation undertaken in compliance with the approved site investigation scheme if required by the approved preliminary risk assessment, a quantitative risk assessment report is submitted to and approved in writing by the Local Planning Authority. This report shall: assess the degree and nature of any contamination identified on the site through the site investigation; include a revised conceptual site model from the approved preliminary risk assessment based on the information gathered through the approved site investigation to confirm the existence of any remaining pollutant linkages which would require the submission of a remediation method statement and determine the remaining risks posed by any contamination to human health, controlled waters and the wider environment. All works must be carried out in compliance with the approved details and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land contamination (Defra 2004) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. The condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, and in accordance with Policies CC9 and CC13 of the Local Plan (2018) and SPD (2018) Key Principles LC1 to LC7.

12) Contamination: Remediation Method Statement

Unless the Local Planning Authority agree in writing that a set extent of development must commence to enable compliance with this condition, no development shall commence until, a remediation method statement, if deemed to be required in the approved quantitative risk assessment, is submitted to and approved in writing by the Local Planning Authority. This statement shall detail any required remediation works and shall be designed to mitigate any remaining risks identified in the approved quantitative risk assessment. This statement will also include a plan to verify that the required remediation works are undertaken in line with the remediation method statement which will be compiled into a verification report. The remediation should then progress in accordance with the agreed remediation method statement. All works must be carried out in compliance with the approved details and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. The condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, and in accordance with Policies CC9 and CC13 of the Local Plan (2018) and SPD (2018) Key Principles LC1 to LC7.

13) Contamination: Verification Report

Unless the Local Planning Authority agree in writing that a set extent of development must commence to enable compliance with this condition, no development shall commence until the approved remediation method statement has been carried out in full if required by the approved quantitative risk assessment, and a verification report confirming these works has been submitted to, and approved in writing, by the Local Planning Authority. This report shall include: details of the remediation works carried out; results of any verification sampling, testing or monitoring including the analysis of any imported soil; all appropriate waste Duty of Care documentation and the validation of gas membrane placement. If, during development, contamination not previously identified is found to be present at the site, the Local Planning Authority is to be informed immediately and no further development (unless otherwise agreed in writing by the Local Planning Authority) shall be carried out until a report indicating the nature of the contamination and how it is to be dealt with is submitted to, and agreed in writing by, the Local Planning Authority. Any required remediation shall be detailed in an amendment to the remediation method statement to be submitted and approved by the Local Planning Authority and verification of these works included in the verification report. All works must be carried out in compliance with the approved details and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. The condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, and in accordance with Policies CC9 and CC13 of the Local Plan (2018) and SPD (2018) Key Principles LC1 to LC7.

14) Contamination: Onward Long-Term Monitoring

Unless the Local Planning Authority agree in writing that a set extent of development must commence to enable compliance with this condition, no development shall commence until an onward long-term monitoring methodology report, is submitted to and approved in writing by the Local Planning Authority setting out where further monitoring is required past the completion of development works (as identified in the approved site investigation scheme or the approved remediation statement or the approved verification report) to verify the success of the remediation undertaken. If required, a verification report of these monitoring works shall then be submitted to and approved in writing by the Local Planning Authority when it may be demonstrated that no residual adverse risks exist. All works must be carried out in compliance with the approved details and by a competent person who conforms to CLR 11: Model Procedures for the Management of Land Contamination (Defra 2004) or the current UK requirements for sampling and testing.

Potentially contaminative land uses (past or present) are understood to occur at, or near to, this site. The condition is required to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works, and in accordance with Policies CC9 and CC13 of the Local Plan (2018) and SPD (2018) Key Principles LC1 to LC7.

15) Detailed external drawings

Prior to the commencement of each relevant phase (excluding Enabling Works) hereby permitted, detailed drawings at a scale not less than 1:20 (in plan, section, and elevation) of a typical bay of each elevation of each new building and of the junctions with adjacent buildings shall be submitted to and approved in writing by the Council. The works shall be carried out in accordance with the details as approved and thereafter permanently retained in this form.

To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, to preserve the special architectural and historic interest of the listed buildings and their setting, and to preserve the character and appearance of the Conservation Area, in accordance with Policy 7.6 of the London Plan (2016), and Policies DC1, DC2, DC4 and DC8 of the Local Plan (2018).

16) External materials

Prior to the commencement of any relevant works (excluding Enabling Works) hereby permitted, details and samples of all external facing and roofing materials to be used are to be submitted to and approved in writing by the Council. Prior to the commencement of the corresponding element of construction, external material sample panels, including samples of brickwork, stonework, pointing style, mortar colour and mix shall be erected onsite for the inspection by Council's Conservation Officer and written approval by Council. The works shall be carried out in accordance with the details as approved and thereafter permanently retained in this form.

To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, to preserve the special architectural and historic interest of the listed buildings and their setting, and to preserve the character and appearance of the Conservation Area, in accordance with Policy 7.6 of the London Plan (2016), and Policies DC1, DC2, DC4 and DC8 of the Local Plan (2018).

17) Detailed internal drawings

Prior to the commencement of the relevant part of the works hereby permitted, detailed drawings at a scale of not less than 1:20 in plan, section and elevation of the proposed works, repair and restoration of all internal spaces (including all rooms and circulation spaces) shall be submitted to and approved in writing by the Council. The works shall be undertaken in accordance with the approved details prior to occupation and shall thereafter be permanently retained.

To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, to preserve the special architectural and historic interest of the listed buildings and their setting, and to preserve the character and appearance of the Conservation Area, in accordance with Policy 7.6 of the London Plan (2016), and Policies DC1, DC2, DC4 and DC8 of the Local Plan (2018).

18) Internal materials

Prior to commencement of the relevant part of the works hereby permitted, details and samples of all new and replacement internal materials including all surface finishes and all paint colours including those to be used in works to flooring, walls, ceilings, stairs, balustrades, internal light fittings (in particular to ceilings, recessed fittings, design of pendants, lighting rafts) shall be submitted to and approved in writing by the Local Planning Authority. The works shall be implemented in accordance with the approved details prior to occupation of the listed building and shall thereafter be permanently retained.

To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, to preserve the special architectural and historic interest of the listed buildings and their setting, and to preserve the character and appearance of the Conservation Area, in accordance with Policy 7.6 of the London Plan (2016), and Policies DC1, DC2, DC4 and DC8 of the Local Plan (2018).

19) Detailed boundary drawings

Each relevant phase of the hereby permitted shall not commence prior to the submission and approval in writing by the Council of details and samples of all materials, including 1:20 plans (section, plan and elevation) of boundary walls, railings, gates and fences, and no part of the development shall be used or occupied prior to the completion of the development in accordance with the approved details.

To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, to preserve the special architectural and historic interest of the listed buildings and their setting, and to preserve the character and appearance of the Conservation Area, in accordance with Policy 7.6 of the London Plan (2016), and Policies DC1, DC2, DC4 and DC8 of the Local Plan (2018).

20) Detailed fenestration drawings

Prior to the commencement of each relevant phase of development (excluding Enabling Works) hereby permitted, detailed drawings of each window type at a scale of not less than 1:20 in plan, section and elevation of all new, refurbished and replacement windows, including details of fenestration materials, frame and glazing bar profiles, opening style, subdivision and secondary glazing (including details of opening style and sub-division), and any other acoustic and environmental upgrades to existing windows shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details prior to the occupation of the building and shall thereafter be permanently retained.

To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, to preserve the special architectural and historic interest of the listed buildings and their setting, and to preserve the character and appearance of the Conservation Area, in accordance with Policy 7.6 of the London Plan (2016), and Policies DC1, DC2, DC4, DC6 and DC8 of the Local Plan (2018).

21) Permitted Development: Schools

Pursuant to Article 3 of the Town and Country Planning (General Permitted Development) Order 2015, as amended, Classes M and N of Part 7 of Schedule 2 of the said Order (being extensions etc and hard surfaces for schools, colleges, universities and hospitals) (or any Order revoking or re-enacting that Order with or without modification) shall not apply to the school site to which this planning permission relates, and no such development within the curtilage of the school shall take place without planning permission first being obtained.

To enable the Council to retain control over any future development in view of the overall design and integrated appearance of the scheme and the effect of any such development on the special architectural and historic interest of the listed buildings and their setting, the character and appearance of the Conservation Area, external recreational areas of the school, and the amenities of the surrounding properties, in accordance with Policies DC1, DC2, DC4, DC8, HO11, CC11 and CC13 of the Local Plan (2018).

22) Permitted Development: Telecommunications Equipment

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015, as amended, (or any Order revoking or re-enacting that Order with or without modification), no aerials, antennae, satellite dishes or related telecommunications equipment shall be erected on any part of the development hereby permitted, without planning permission first being obtained.

To ensure that that the visual impact of telecommunication equipment can be considered in accordance with Policies DC1, DC2, DC4 and DC8 of the Local Plan (2018).

23) Changes to the external appearance of the new buildings

No alterations shall be carried out to the external appearance of the development hereby permitted, including the installation of soil stacks, plumbing, pipes, vents, chimneys or flues, ductwork, grilles, security alarms, lighting, cameras, air-conditioning units, ventilation fans, extraction equipment, air source heat pumps unless shown on the drawings hereby approved without planning permission first being obtained.

To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, to preserve the special architectural and historic interest of the listed buildings and their setting, to preserve the character and appearance of the Conservation Area and to ensure that neighbouring occupiers are not unduly affected by smell, noise and disturbance, in accordance with Policies DC1, DC2, DC4, DC8, HO11, CC11 and CC13 of the Local Plan (2018).

24) No plant, water tanks

No plant, water tanks, water tank enclosures or other structures, that are not shown on the approved plans, shall be erected upon the roofs of the buildings/extensions hereby permitted approved without planning permission first being obtained.

To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, to preserve the special architectural and historic interest of the listed buildings and their setting, to preserve the character and appearance of the Conservation Area and to ensure that neighbouring occupiers are not unduly affected by smell, noise and disturbance, in accordance with Policies DC1, DC2, DC4, DC8, HO11, CC11 and CC13 of the Local Plan (2018).

25) No Advertisements

The development hereby permitted shall not be used for the display of advertisements, and no advertisements shall be installed on the buildings hereby permitted without the prior written approval of the Council.

To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, to preserve the special architectural and historic interest of the listed buildings and their setting, and to preserve the character and appearance of the Conservation Area, in accordance with Policies DC1, DC2, DC4 and DC8 of the Local Plan (2018).

26) Flood Risk Assessment

The development shall only be carried out in accordance with the flood mitigation measures set out in the approved Flood Risk Assessment, Revision 03, prepared by Price & Myers, received 14th September 2020. The measures shall be implemented in accordance with the approved details, and permanently retained in full working order for the lifetime of the development.

To reduce the impact of flooding for future occupants and the development and to make the development more resilient in the event of flooding in accordance with

Policies 5.11, 5.13, 5.14 and 5.15 of the London Plan (2016), and Policy CC3 of the Local Plan (2018).

27) Sustainable Drainage Strategy

Prior to commencement of the development hereby permitted, a revised Sustainable Drainage Strategy (SuDS), which details how surface water will be managed on-site in-line with the London Plan Drainage Hierarchy's preferred SuDS measures, shall be submitted to and approved in writing by the Local Planning Authority. Information shall include details on the design, location and attenuation capabilities of the proposed sustainable drainage measures such as soakaways, green roofs and attenuation tanks. Details of the proposed flow controls and flow rates for any discharge of surface water to the combined sewer system should also be provided, with the aim of achieving greenfield rates for final discharges. The Strategy shall be implemented in accordance with the approved details, and thereafter all SuDS measures shall be retained and maintained in accordance with the approved details and shall thereafter be permanently retained in this form.

To prevent any increased risk of flooding and to ensure the satisfactory storage of/disposal of surface water from the site in accordance with Policy 5.13 of The London Plan (2016), and Policy CC4 of the Local Plan (2018).

28) Energy and Sustainability Statement

The relevant phase of the development hereby approved shall not be occupied until the measures set out in the approved Energy and Sustainability Statement, Rev 3.0 dated 1st June 2020, by Skelly and Couch, and associated addendum Rev 1.0, dated 17/09/2020, have been implemented on site and they shall be permanently retained thereafter.

In the interests of energy conservation and reduction of CO₂ emissions, in accordance with Policies 5.1, 5.2, 5.3, 5.5, 5.6, 5.7 and 5.8 of the London Plan (2016) and Policies CC1 and CC2 of the Local Plan (2018).

29) Solar PV Panels

Prior to the commencement of the relevant phase of the development hereby permitted (excluding Enabling Works) details of the proposed solar PV panels including manufacturer's details, and the number, position and angle of the panels relative to the surface of the roof(s) shall be submitted to and approved in writing by the Local Planning Authority. The panels shall be implemented in accordance with the approved details, and permanently retained in accordance with the approved details and in full working order for the lifetime of the development.

In the interests of energy conservation and reduction of CO₂ emissions and to preserve the special architectural and historic interest of the listed buildings and their setting and to preserve the character and appearance of the Conservation Area, in accordance with Policies 5.1, 5.2, 5.3, 5.6 and 5.7 of the London Plan (2016) and Policies CC1, DC1, DC2, DC4 and DC8 of the Local Plan (2018).

30) Secure By Design

Prior to commencement of the relevant phase of the development (excluding Enabling Works) hereby permitted, a statement setting out detailed measures of how 'Secured by Design' requirements are to be adequately achieved shall be submitted to and approved in writing by the Local Planning Authority. Such details shall include, but not be limited to CCTV coverage, access controls, basement security measures and potential for connection to the town centre CCTV network. The approved details shall be carried out prior to occupation of the relevant phase of the development hereby approved and permanently retained thereafter.

To ensure that the development incorporates suitable design measures to minimise opportunities for, and the perception of, crime and provide a safe and secure environment, that the special architectural and historic interest of the listed buildings and their setting is preserved and to preserve the character and appearance of the Conservation Area in accordance with Policies 7.1 and 7.6 of the London Plan (2016) and Policies DC1 and DC8 of the Local Plan (2018).

31) Tree Protection

Prior to commencement of the development hereby approved a Tree Protection Plan and Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority. Details shall include tree protection measure to be implemented during both the demolition and construction works to protect trees from damage in accordance with BS5837:2012.

To ensure that trees on site are retained and to prevent harm during the course of construction, in accordance with accordance with Policies DC1, DC8 and OS5 of the Local Plan (2018).

32) Landscaping

Prior to commencement of the development (excluding Enabling Works) hereby permitted, details of the proposed hard and soft landscape works shall be submitted to and approved in writing by the Local Planning Authority. Details shall include hard surfacing materials; planting schedules and details of the species, height and maturity of any trees and shrubs including sections through the planting areas, depths of tree pits, containers and shrub beds; and an implementation programme. The hard landscaping shall be implemented in accordance with the approved details prior to first occupation of the development and any soft landscaping within the first planting season following first occupation and shall be permanently retained in this form.

To ensure a satisfactory external appearance of the development and a satisfactory with its relationship with its surroundings, to preserve the special architectural and historic interest of the listed buildings and their setting and to preserve the character and appearance of the Conservation Area in accordance with Policies 7.1 and 7.6 of the London Plan (2016) and Policies DC1, DC8, OS2 and OS5 of the Local Plan (2018).

33) Replacement Trees, shrubs etc

Any trees, shrubs or planting associated with the soft landscape details that is removed, or seriously damaged, dying, or diseased within five years of the date of planting shall be replaced in the next planting season with a similar size and species to that originally required to be planted.

To ensure a satisfactory external appearance of the development and a satisfactory with its relationship with its surroundings, to preserve the special architectural and historic interest of the listed buildings and their setting and to preserve the character and appearance of the Conservation Area in accordance with Policies 7.1 and 7.6 of the London Plan (2016) and Policies DC1, DC8, OS2 and OS5 of the Local Plan (2018).

34) CDI Planters, and Green Roof Maintenance Strategy

Prior to the occupation of the relevant phase of the development hereby permitted a maintenance strategy for the planters to the roof of the Centre for Design Innovation building and for the green roof of the maintenance building shall be submitted to and approved in writing by the Local Planning Authority. The development shall proceed in accordance with the details as approved and the details shall be maintained as such thereafter.

To ensure a satisfactory external appearance of the development and a satisfactory with its relationship with its surroundings, to preserve the special architectural and historic interest of the listed buildings and their setting, to preserve the character and appearance of the Conservation Area, and to protect the existing amenities of the occupiers of neighbouring residential properties as a result of overlooking and loss of privacy and the generation of noise and disturbance, in accordance with Policy 7.6 of the London Plan (2016), and Policies DC1, DC2, DC4, DC8, HO11, CC11, CC13, OS2 and OS5 of the Local Plan (2018).

35) Access Management Plan

No part of the development hereby approved shall be occupied or used until an Inclusive Access Management Plan has been submitted to and approved in writing by the Local Planning Authority. The plan shall set out a strategy for ongoing consultation with specific interest groups with regard to accessibility of the relevant part of the site. On-going consultation shall then be carried out in accordance with the approved IAMP. The development shall not be operated otherwise than in accordance with the Inclusive Access Management Plan as approved and thereafter be permanently retained in this form.

To ensure that the proposal provides an inclusive and accessible environment in accordance with the Policy 7.2 of the London Plan (2016) and Policies DC1 and DC2 of the Local Plan (2018).

36) Cycle parking

The relevant phase of the development hereby approved shall not be used or occupied prior to the implementation of the cycle parking provision, as indicated on

the approved plans 5242-OOB-ZZ-ZZ-DR-L-0017 P02; 5242-OOB-ZZ-ZZ-DR-L-0016 P01; and 5242-OOB-ZZ-00-DR-L-0043 P06. The cycle storage shall be permanently retained thereafter for users of the development.

To ensure the suitable provision of cycle parking within the development and to promote alternative, sustainable forms of transport, in accordance with Policies 6.9 and 6.13 of the London Plan (2016) and Policy T3 of the Local Plan (2018).

37) Accessible Car Parking

The reconfigured car park hereby approved shall not be used or occupied prior to setting out of the car parking spaces as indicated on approved plan 5242-OOB-ZZ-00-DR-L-0003 P10 including the two accessible car parking spaces. The accessible car parking spaces shall thereafter be retained for the sole use of blue badge holders for the lifetime of the development.

To ensure that the development is accessible, in accordance with Policies T4 and T5 of the Local Plan (2018).

38) Car Park Management Plan

The reconfigured car park hereby approved shall not be used or occupied until a car parking management plan (CPMP) has been submitted to and approved in writing by the Council. The details shall include management and allocation of spaces between the various users, controls and method of access. The CPMP should include a mechanism to ensure that the supply and demand of Blue Badge bays for disabled visitors and staff is regularly monitored and provision is reviewed if required. The development shall proceed in accordance with the details as approved and the details shall be maintained as such thereafter. The total number of car parking spaces shall not exceed 24 spaces.

To ensure appropriate levels, mix and location of parking is achieved and that management arrangements are in place to control its allocation and use, in the interests of protecting the amenities of surrounding occupiers and the amenity of the highway, in accordance with Policies CC13, T4, T5 and T6 of the Local Plan (2018).

39) Electric Charging Points

Prior to commencement of reconfigured car park hereby permitted (excluding Enabling Works), details of the installation including location and type of active electric vehicle charging points (7-22KW) within approved reconfigured car park must be submitted to and approved in writing by the Local Planning Authority. The use of the approved active electric vehicle charging points, comprising a minimum of 50 per cent for electric vehicles with an additional 50 per cent passive provision for electric vehicles in the future, will be regularly monitored via the Travel Plans. The approved electric vehicle charging points shall be retained in working order for the lifetime of the Development.

In the interest of adapting to climate change and to secure sustainable development in accordance with Policies T4 and CC10 of the Local Plan (2018).

40) Delivery and Servicing Plan

Prior to occupation of the reconfigured car park hereby permitted, a Delivery and Servicing Plan (DSP) shall be submitted to and approved in writing by the Local Planning Authority. Details shall include the management and times of deliveries to avoid peak times, emergency access, collection of waste and recyclables, times and frequencies of deliveries and collections, silent reversing methods, quiet loading/unloading measures, location of loading bays and vehicle movements. The approved details shall be implemented prior to occupation and the DSP hereby permitted shall thereafter operate in accordance with the approved details. The DSP shall be regularly monitored and reviewed and any subsequent modifications or alterations to the DSP should be submitted to and approved in writing by the LPA.

To ensure that satisfactory provision is made for refuse storage and collection and to ensure that the amenity of occupiers of the surrounding premises and the development are not adversely affected by noise and that servicing activities do not adversely impact on the highway, in accordance with Policy 6.11 of the London Plan (2016) and Policies T2, T4, T5, CC11 and CC13 of the Local Plan (2018).

41) Servicing Area

The relevant phase of the development hereby approved shall not be used or occupied prior to the provision of the vehicle service area to the north of the site, as indicated on the approved drawings. The facility shall thereafter be retained in the approved form.

To ensure that satisfactory provision is made for servicing and to ensure that the amenity of occupiers of the surrounding premises and the development are not adversely affected by noise and that servicing activities do not adversely impact on the highway, in accordance with Policy 6.11 of the London Plan (2016) and Policies T2, T4, T5, CC11 and CC13 of the Local Plan (2018).

42) Noise

Noise from uses and activities within the building/ development site shall not exceed the criteria of BS8233:2014 at neighbouring noise sensitive/ habitable rooms and private external amenity spaces.

To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

43) Plant, machinery noise

The external sound level emitted from plant, machinery or equipment at the development hereby approved shall be lower than the lowest existing background sound level by at least 10dBA in order to prevent any adverse impact. The assessment shall be made in accordance with BS 4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity.

To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from plant/mechanical installations/ equipment, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

44) Anti-vibration Measures

Prior to use, machinery, plant or equipment, extract/ ventilation system and ducting at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by vibration, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

45) External Lighting

External artificial lighting at the development shall not exceed lux levels of E3 Environmental Zone criteria of vertical illumination at neighbouring premises that are recommended by the Institution of Lighting Professionals in the 'Guidance Notes for The Reduction Of Light Pollution Obtrusive Light 2020. Lighting should be minimized and glare and sky glow should be prevented by correctly using, locating, aiming and shielding luminaires, in accordance with the Guidance Notes.

To ensure that the amenity of occupiers of surrounding premises is not adversely affected by lighting, in accordance with Policies CC12 and CC13 of the Local Plan (2018).

46) Maintenance Building Hours of Use

The maintenance building hereby approved (with the exception of the workshop, shall not be used outside of the hours 06:00 hrs and 20:00 hours daily, unless otherwise agreed in writing by the Council. The workshop shall not be used outside of the hours 08:00 hrs and 17:00 hours daily, unless otherwise agreed in writing by the Council.

To ensure that the use does not result in loss of amenity to neighbouring residents in terms of noise and disturbance in accordance with Policies CC11 and CC13 of the Local Plan (2018).

47) No Tannoys

No external tannoys or public address systems shall be used, unless details are first submitted to, and approved in writing by, the Council. Approved details shall be implemented prior to use and thereafter be permanently retained.

To ensure that the use does not result in loss of amenity to neighbouring residents in terms of noise and disturbance in accordance with Policies CC11 and CC13 of the Local Plan (2018).

48) No Terrace

No alterations shall be carried out to the flat roofs of the development hereby permitted to create a terrace or other amenity space. No railings or other means of enclosure shall be erected around the roofs and no alterations shall be made to form access onto the roofs.

The formation/use of a terrace would be harmful to the existing amenities of the occupiers of neighbouring residential properties as a result of overlooking and loss of privacy and the generation of noise and disturbance, contrary to Policies DC2, DC4, HO11, CC11 and CC13 of the Local Plan (2018), and Key Principle HS8 of the Planning Guidance Supplementary Planning Document (2018).

49) Obscure Glazing

Prior to commencement of the relevant element of the works to the Centre for Design and Innovation (excluding Enabling Works) hereby permitted details and samples of the obscure glazing to the west elevation of the Centre for Design and Innovation building and Mercers Building, facing the rear elevations of the properties on Rowan Road, have been submitted to, and approved in writing by, the Council. The glazing shall be installed as approved prior to the occupation of the extensions and maintained in this form thereafter.

To ensure a satisfactory external appearance, and to prevent overlooking of the existing occupiers of neighbouring properties and a subsequent loss of privacy, in accordance with Policies DC1, DC2, DC4, DC8 and HO11 of the Local Plan (2018), and Key Principle HS8 of the Planning Guidance Supplementary Planning Document (2018).

50) Timber Screen

Prior to commencement of the relevant phase of the development (excluding Enabling Works) hereby permitted, details and samples of materials, including 1:20 plans (section, plan and elevation) of the timber screen to be erected on top of the western boundary wall shall be submitted to, and approved in writing by the Council. No part of the Centre for Design and Innovation building shall be used or occupied prior to the installation of the timber screening in accordance with the approved details, and the screening shall thereafter be permanently retained in the approved form.

To ensure a satisfactory external appearance of the development and a satisfactory with its relationship with its surroundings, to preserve the special architectural and historic interest of the listed buildings and their setting, to preserve the character and appearance of the Conservation Area, and to protect the existing amenities of the occupiers of neighbouring residential properties as a result of overlooking and loss of privacy, in accordance with Policy 7.6 of the London Plan (2016), and Policies DC1, DC2, DC4, DC8 and HO11 of the Local Plan (2018).

51) Air Quality: Zero Emission Heating Plant Compliance

Prior to occupation of the relevant phase of the development hereby permitted, details of the installation of the Zero Emission Air Source Heat Pumps or Electric Boilers to be provided for space heating and hot water shall be submitted to and approved in writing by the Local Planning Authority. Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

To ensure that the amenity of occupiers of the development site and neighbouring occupiers is not adversely affected by poor air quality, in accordance with Policy 7.14 of the London Plan (2016) and Policy CC10 of the Local Plan (2018).

52) Air Quality: Ultra Low Emission Strategy

Prior to occupation of the development hereby permitted an Ultra Low Emission Strategy (ULES) for the operational phase of the development in order to mitigate the impact of air pollution shall be submitted to and approved in writing by the Local Planning Authority. The ULES must detail the remedial action and mitigation measures that will be implemented to protect receptors (e.g. design solutions). This Strategy must make a commitment to implement the mitigation measures that are required to reduce the exposure of poor air quality and to help mitigate the development's air pollution impacts, in particular the emissions of NOx and Particulates (PM2.5, PM10) from on-road vehicle transport by the use of Zero Exhaust Emission Vehicles in accordance with the emissions hierarchy 1) Cargo bike (2) Electric Vehicle, (3) Alternative Fuel e.g. CNG, Hydrogen, LPG (4) Hybrid (Electric-Petrol) (5) Diesel/ Petrol Euro 6 (AIR Index Urban NOx rating A) and Euro VI . A monitoring report of the implementation of the ULES shall be submitted on annual basis to the LPA. Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

To ensure that the amenity of occupiers of the development site and neighbouring occupiers is not adversely affected by poor air quality, in accordance with Policy 7.14 of the London Plan (2016) and Policy CC10 of the Local Plan (2018).

53) Air Quality: Air Quality Dust Management Plan

Prior to the commencement of the demolition phase of the development hereby permitted, an Air Quality Dust Management Plan (AQDMP) in order to mitigate air pollution shall be submitted to and approved in writing by the Local Planning Authority. The AQDMP must include an Air Quality Dust Risk Assessment (AQDRA) that considers sensitive receptors on-site and off-site of the development and is undertaken in compliance with the methodology contained within Chapter 4 of the Mayor of London 'The Control of Dust and Emissions during Construction and Demolition', SPG, July 2014 and the identified measures recommended for inclusion into the AQDMP. The AQDMP submitted must comply with the Mayor's SPG and should include: Inventory and Timetable of dust generating activities during demolition and construction; Site Specific Dust mitigation and Emission control measures in the table format as contained within Appendix 7 of Mayor's SPG including for on-road and off-road demolition and construction traffic. The Non-Road Mobile Machinery (NRMM) used on the site

shall include CESAR Emissions Compliance Verification (ECV) identification and shall comply with the minimum Stage IV NOx and PM10 emission criteria of The Non-Road Mobile Machinery (Type-Approval and Emission of Gaseous and Particulate Pollutants) Regulations 2018 and its subsequent amendments. This will apply to both variable and constant speed engines for both NOx and PM. An inventory of all NRMM for the first phase of demolition shall be registered on the NRMM register <https://london.gov.uk/non-road-mobile-machinery-register> prior to commencement of demolition works and thereafter retained and maintained until occupation of the development; use of on-road Ultra Low Emission Zone (ULEZ) compliant vehicles e.g. Diesel/ Petrol Euro 6 (AIR Index Urban NOx rating A, B) and Euro VI; Details including calibration certificates of MCERTS compliant monitoring of Particulates (PM10) used to prevent levels exceeding predetermined PM10 threshold trigger levels. Developers must ensure that on-site contractors follow best practicable means to minimise dust, particulates (PM10, PM2.5) and NOx emissions at all times. Approved details shall be fully implemented and permanently retained and maintained during the demolition and construction phases of the development.

To ensure that the amenity of occupiers of the development site and neighbouring occupiers is not adversely affected by poor air quality, in accordance with Policy 7.14 of the London Plan (2016) and Policy CC10 of the Local Plan (2018).

54) Ecology Appraisal

The development hereby approved shall be carried out in accordance with the mitigation measure set out in the Ecological Appraisal, dated 1st October 2019, and the Bat Survey, Revision 03, dated 26/05/2020.

To ensure the biodiversity of the site is protected and enhanced where possible, in accordance with Policy 7.19 of the London Plan (2016) and Policy OS4 of the Local Plan (2018).

55) Thames Water: Surface Water

No properties shall be occupied until confirmation has been provided that either:-
1. Capacity exists off site to serve the development or 2. A housing and infrastructure phasing plan has been agreed with Thames Water. Where a housing and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Or 3. All wastewater network upgrades required to accommodate the additional flows from the development have been completed.

Condition requested by Thames Water in respect to SURFACE WATER for the following reason: Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning.

56) Thames Water: Foul Water

No properties shall be occupied until confirmation has been provided that either:-
1. Capacity exists off site to serve the development, or 2. A housing and infrastructure phasing plan has been agreed with Thames Water. Where a housing and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan, or 3. All wastewater network upgrades required to accommodate the additional flows from the development have been completed.

Condition requested by Thames Water in respect to FOUL WATER for the following reason: Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning.

57) Enabling works

Enabling Works as referred to in the conditions shall comprise only of; any MEP/utility relocation/installations, external archaeological site investigations and surveys, boreholes and trial pits, internal exploratory works necessary to discharge specific conditions, ecological surveys/investigations, temporary access/highway works, underground drainage and provision of external temporary welfare and office accommodation.

To ensure that the development accords with the provisions and assessment of the approved plans and to ensure that the development is carried out in a satisfactory manner in accordance with Policies DC1 and CC2 of the Local Plan (2018).

Justification for Approving the Application:

1) Justification.

1. Land Use: The proposal would result in the improvement of educational facilities for the school and, subject to a legal agreement, the wider community, in line with the NPPF, London Plan (2016) Policies 3.16 and 3.18, Draft London Plan Policy S3 and Local Plan (2018) Policies CF1 and CF2.

2. Design and Heritage: Development of this site provides an opportunity to safeguard the sites original use as a school which would help to secure the long term conservation of the listed buildings on the site. The proposal complies with Local Plan (2018) Policies DC1, DC2, DC4 and DC8 in that it respects the existing townscape context, is of a high quality of design and would be compatible with the scale and character of existing development and its setting. The proposals would result in less than substantial harm to the significance of the main school listed building and the Conservation Area. The settings of adjacent heritage assets would be preserved. The harm to the significance of the listed buildings and the Conservation Area has been minimised and fully justified and would be outweighed by public benefits, including securing the optimum viable use of the listed building, enhancing educational facilities for children attending the School

and those attending local schools, as well as for local charities and organisations, and improving accessibility, and in these respects the proposal would comply with Local Plan (2018) Policy DC8. It is considered that this is compliant with Section 16, Section 66 and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposal is also in accordance with national guidance in the NPPF, London Plan (2016) Policies 7.4, 7.5 and 7.6, Draft London Plan Policies D2, Local Plan (2018) Policies DC1, DC2, DC4 and DC8, and Key Principles of the Planning Guidance SPD (2018).

3. Impact on Neighbouring Properties: On balance, the impact of the proposed development upon adjoining occupiers is not considered unacceptable. The impact to residential amenity from both construction and operational phases has been considered. There would be no significant worsening of outlook, overlooking, and noise/disturbance, and no unacceptable loss of sunlight or daylight or outlook to cause undue detriment to the amenities of neighbours. Measures would be secured by condition to minimise noise and disturbance to nearby occupiers from the demolition and construction phases as well as the operation of the proposed facilities. In this regard, the development would respect the principles of good neighbourliness. The proposed development therefore accords with the NPPF, London Plan (2016) Policies 7.1, 7.2, 7.3, 7.4, 7.5, 7.6 and 7.21, Local Plan (2018) Policies DC2, DC4, DC8, H011, CC10, CC11, CC12 and CC13, and Key Principles of the Planning Guidance SPD (2018).

4. Transport: The application is supported by several documents including; a Transport Statement, an Outline Demolition and Construction Logistics Plan, Outline Delivery and Servicing Plan, and a Travel Plan which provide a comprehensive review of all the potential transport impacts of the proposed development. The proposal would not result in a material increase in pupil or staff numbers, or a detrimental increase in travel movements from the existing community use. The accessibility level of the site is excellent, and the site is well served by public transport. It is considered that the scheme would not have a significant impact on the highway network or local parking conditions and is thus considered to be acceptable. Satisfactory provision would be made for blue badge car parking and cycle parking. External impacts of the development would be controlled by conditions related to refuse storage, servicing, and demolition and construction logistics plans while the monitoring of the Travel Plans is secured by legal agreement. The proposed development therefore accords with the NPPF, London Plan (2016) Policies 5.16, 5.17, 6.1, 6.3, 6.9, 6.10, 6.11 and 6.13, Draft London Plan Policies T1-T7, Local Plan (2018) Policies CC7, T1, T2, T3, T4 and T7, and Key Principles of the Planning Guidance SPD (2018).

5. Sustainability and Energy: The application is supported by an Energy and Sustainability Statement which demonstrates how the proposal seeks to minimise its environmental impact. The proposed development has been designed to meet the highest standards of sustainable design and construction, and proposes a number of measures to reduce CO2 emissions to target London Plan targets, given restrictions due to the desirability of preserving the special architectural and historic interest of the listed buildings and their setting and the character and appearance of the Conservation Area. A carbon dioxide emission offset contribution will be secured by a S106 Agreement. The proposed development therefore accords with the NPPF, London Plan (2016) Policies 5.1, 5.2, 5.3, 5.5,

5.6, 5.7 and 5.8, Draft London Plan Policies SI2 and SI4, Local Plan (2018) Policies CC1 and CC2, and Key Principles of the Planning Guidance SPD (2018).

6. Flood Risk and Drainage: The site is in Flood Zone 3. A Flood Risk Assessment has been submitted which includes measures to ensure the risk of flooding from groundwater at the site remains low. Sustainable drainage systems would be integrated into the development. A finalised SuDS Strategy will be secured by condition. The development would therefore be acceptable in accordance with the London Plan (2016) Policies 5.11 to 15, Draft London Policies SI12 and SI13, Local Plan (2018) Policies CC2, CC3 and CC4, and Key Principles of the Planning Guidance SPD 2018.

7. Air Quality: The application is supported by an Air Quality Assessment. There will be an impact on local air quality because of the demolition, construction and operation of the proposed development. However, conditions are proposed to ensure that appropriate measures are taken to mitigate the impacts of the development. The proposed development therefore accords with the NPPF, London Plan (2016) Policy 7.14, Draft London Plan Policy SI1, and Local Plan (2018) Policy CC10.

8. Land Contamination: Conditions will ensure that the site would be remediated to an appropriate level for the sensitive educational use. The proposed development therefore accords with the NPPF, London Plan (2016) Policy 5.21, Local Plan (2018) Policies CC9 and CC11, and Key Principles of the Planning Guidance SPD (2018).

9. Trees, Biodiversity and Ecology: The application is supported by an Ecology Report which sets out measures to protect nesting birds and bats. A tree survey has been included to assess the impact to trees. Conditions are proposed to secure the implementation of mitigation measures. The proposed development therefore accords with the NPPF, London Plan (2016) Policies 7.19 and 7.21, Draft London Plan Policies G5-G7, and Local Plan Policies OS4 and OS5.

10. Safety and Access: The proposals seek to improve accessibility and security. Conditions will secure an Inclusive Accessibility Management Plan and the requirement for the proposals to meet Secured by Design standards. The proposed development therefore accords with the NPPF, London Plan (2016) Policies 7.2 and 7.13, Draft London Plan Policies D5 and D11, Local Plan (2018) Policies CF1, DC2 and DC4, and Key Principles of the Planning Guidance SPD (2018).

11. Objections: Whilst a large number of issues have been raised by objectors to the scheme it is considered, for the reasons explained in the detailed analysis, that planning permission should be granted for the scheme subject to appropriate safeguards to ensure that necessary controls and mitigation measures are established. This decision is taken on the basis of the proposed controls, mitigation measures and delivery commitments contained in the draft conditions and Heads of Terms for the Section 106 Agreement set out in this committee report, which are considered to provide an adequate framework of control to ensure as far as reasonably practicable that the public benefits of the scheme will be realised in accordance with relevant planning policies whilst providing the

mitigation measures and environmental improvements needed to address the likely significant adverse impacts of the development.

12. Conditions: In line with the Town and Country Planning Act 1990 and the Town and Country Planning (Pre-commencement Conditions) Regulations 2018, officers have consulted the applicant on the pre-commencement conditions included in the agenda and the applicant has raised no objections.

13. Planning Obligations: Planning obligations to offset the impact of the development and to make the development acceptable in planning terms are secured. Contributions relating to community use of the proposed development, travel plan monitoring, highways works, and carbon dioxide emission offset contribution are secured. The proposed development would therefore mitigate external impacts and would accord with London Plan (2016) Policy 8.2 and Local Plan (2018) Policy CF1.

LOCAL GOVERNMENT ACT 2000 LIST OF BACKGROUND PAPERS

All Background Papers held by Andrew Marshall (Ext: 4841):

Application form received: 15th June 2020

Drawing Nos: see above

Policy documents: National Planning Policy Framework (NPPF) 2019
The London Plan 2016
LBHF - Local Plan 2018
LBHF – Planning Guidance Supplementary Planning Document
2018

Consultation Comments:

Comments from:	Dated:
Historic England London Region	20.07.20
Thames Water - Development Control	20.07.20
Environment Agency - Planning Liaison	20.07.20
Crime Prevention Design Advisor - Hammersmith	14.07.20
Action On Disability	03.08.20
Crime Prevention Design Advisor - Hammersmith	15.09.20

Neighbour Comments:

Letters from:	Dated:
32 Brook Green London W6 7BL	16.07.20
32 Brook Green London W6 7BL	19.08.20
32 Brook Green London W6 7BL	27.07.20
32 Brook Green London W6 7BL	13.08.20
44 Rowan Road London W67DU	27.07.20
44 Rowan Road London W67DU	27.07.20

32 Brook Green London W6 7BL	13.07.20
39 Brook Green London W6 7BL	26.07.20
Property Services Office Diocese of Westminster NW4 4TY	24.07.20
Property Services Office Diocese of Westminster NW4 4TY	06.08.20
36 Brook Green London W6 7BL	25.07.20
28 Brook Green London W6 7BL	30.07.20
27 Brook Green London W67BL	25.07.20
27 Brook Green London W67BL	30.07.20
24 Broadmead Auriol Road London W14 0SS	29.07.20
34 Brook Green London W6 7BL	19.07.20
34 Brook Green London W6 7BL	24.07.20
34 Brook Green London W6 7BL	05.08.20
34 Brook Green London W6 7BL	30.07.20
34 Brook Green London W6 7BL	19.07.20
31 Brook Green London W6 7BL	05.08.20
31 Brook Green London W6 7BL	26.07.20
35 Brook Green London W6 7BL	25.07.20
35 Brook Green London W6 7BL	25.07.20
33 Brook Green London W6 7BL	17.07.20
33 Brook Green London W6 7BL	30.07.20
33 Brook Green London W6 7BL	26.07.20
37 Brook Green London W6 7BL	26.07.20
31 Brook Green London W6 7BL	26.07.20
32 Brook Green London w6 7BL	02.08.20
NAG (cllr Objection)	29.07.20
33 Brook Green London W6 7BL	26.07.20
34 Brook Green London W6 7BL	27.07.20
32 Brook Green London W6 7BL	03.08.20
Larmenier & Sacred Heart Catholic Primary School	
41A Brook Green W6 7BL	27.07.20
38 Brook Green London W6 7BL	24.07.20
38 Brook Green London W6 7BL	26.07.20

1.0 SITE AND SURROUNDINGS

- 1.1 The application relates to St Paul's Girls' School (hereafter referred to as SPGS). The School was founded in 1904, and is spread over three sites, covering a total of 3.16 hectares. The School's swimming pool fronts onto Brook Green, at the corner with Luxemburg Gardens, and the sports pavilion and playing fields are located at Bute Gardens. The main site, and the subject of this planning application, covers approximately 1.4 hectares and is located on the southern side of Brook Green, within the Brook Green Conservation Area. The site consists of several grade II listed buildings, and buildings which are listed by virtue of being located within the curtilage of the listed buildings and dating from prior to 1948.
- 1.2 The site consists of a complex of buildings which has evolved over time. The listed buildings on the site were designed by Gerald Horsley over a thirty year period in the early twentieth century. The Main School building and Forum Building, date from 1903, and are Grade II listed. The Rosalind Franklin Building (former swimming pool building) was completed in 1909 and is a listed curtilage

building to the main school building. The Gustav Holst Music Wing and High Mistress's House, No. 48 Rowan Road, were completed in 1913 and are both listed separately at Grade II. The Science Building to the south of the main school building was completed in 1933 and is a listed curtilage building to the main school building. Subsequently the main school site has continued to expand including the construction of the Celia Johnson building in 1983-4, the Mercer's Building in 1994, the Sports Hall in 2000, and most recently the Garden Building completed in 2018. These modern buildings are not statutory listed, not on the Local Register of Buildings of Merit and nor could they be considered as non designated heritage assets.

- 1.3 The immediate area is predominantly residential. The properties on the eastern side of Rowan Road are a terrace of grade II listed cottages which border the site to the west. To the east the school borders a number of residential properties along Brook Green which are locally listed as Buildings of Merit (BOM), as well as Larmenier and Sacred Heart Catholic Primary School. To the south is Latymer Court apartment block and commercial properties fronting Hammersmith Road.
- 1.4 The site is located in PTAL area 6 meaning it has excellent access to public transport.
- 1.5 The site is also located in the Environment Agency's Flood Zone 3.

2.0 RELEVANT PLANNING HISTORY

- 2.1 There are several planning records relating to the site. The following list constitutes the most relevant recent planning history:
- 2.2 1991/00833/FUL & 1991/00834/LBC - Erection of a two-storey building for use as a design and technology centre and an additional floor at roof level onto the existing science building together with the erection of an external staircase. Approved.
- 2.3 1997/02224/FUL - Erection of a two-storey sports hall with associated accommodation and alterations to external sports area and landscaping. Approved.
- 2.4 1998/01278/LBC - Dismantling of access gates and demolition of supporting pier and dwarf wall to enlarge vehicular access for a temporary period in connection with construction of sports hall, to be replaced as existing. Approved.
- 2.5 2010/01802/FUL & 2010/01805/LBC - Excavation in connection with the enlargement of the basement and the erection of a single storey side extension to the Singing Hall on Rowan Road elevation following demolition of existing garage and entrance lobby (Amendment to Application 2009/00146/FUL granted 23rd March 2009 and 2010/00441/LBC granted 9th April 2010 respectively, involving the replacement of two windows to the front and side elevation of the single storey side extension with a new door and a recess window in brick). Approved.

- 2.6 2015/03622/FUL - Alterations to the Celia Johnson Building to include bricking up of 2no windows to the eastern elevation, installation of a new air conditioning unit, 2no louvres and the replacement of existing window with doors to the northern elevation at ground floor level; installation of new roof top plant and associated screening at roof level; associated external alterations. Approved.
- 2.7 2015/02035/FUL and 2015/02036/LBC Erection of a new part single, part two storey senior school building at the southern end of the site; extension of the art classrooms at second floor level of the Main school building at the rear over existing terraces; enclosure of spaces between the Main building and The Forum and Rosalind Franklin buildings by erection of glazed structures; erection of new single storey Porters' Lodge fronting Brook Green; alterations to create a new entrance in the southern elevation of the Science building; demolition works including the demolition of the boiler house and flue; landscaping, alterations to boundary treatments and other associated works. Approved. (referred to by the applicant as Phase 1)
- 2.8 2016/05020/VAR Variation of condition 2 of planning permission ref. 2015/02035/FUL granted 13th May 2016 to substitute the approved drawings and allow minor material amendments to the development including alterations to the elevations and floor plans of the new senior school building at the southern end of the site, approval of details pursuant to conditions 3, 4, 19, 27, 34 and 35 of planning permission ref. 2016/02035/FUL. Approved.
- 2.9 2016/05023/VLBC Application under Section 19 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to vary condition 2 of listed building consent Ref.2015/02036/LBC granted 13th May 2016 to allow amendments to the development including alterations to the elevations and floor plans of the new senior school building at the southern end of the site. Approved.
- 2.10 More recently, a number of applications have been approved for works to the Rosalind Franklin Building and Music Wing (2020/00265/FUL, 2020/00130/LBC, 2020/00266/LBC, 2020/00165/LBC and 2020/00164/FUL). These are for the accelerated and enabling works for the masterplan.

3.0 PROPOSAL

- 3.1 Between 2010 and 2015, SPGS undertook a master plan exercise across the entirety of their estate to provide enhanced educational facilities. From this the senior school building (Garden Building) at the main site and The Pavilion at the playing field were approved (see application references: 2015/02035/FUL and 2015/02036/LBC under para. 2.7), and have now been completed under "Phase 1".
- 3.2 A pause after the delivery of Phase 1 of the original master plan has provided the school an opportunity to reflect on its developing needs and whether the key challenges facing the school remain the same. This has been particularly necessary in view of the time that has passed since the master plan was finalised in 2015.

3.3 It has been determined that there is a requirement for additional space and rationalisation, up to date technology, partnership working, improved well-being and improved access and security. The current application proposes the next phases of the School's master plan and seeks planning permission for the:

'Demolition of the existing Rosalind Franklin Building (excluding boiler house arch and chimney) and erection of a new two storey Centre for Design and Innovation (CDI) adjacent to the retained boundary wall to the rear of properties on Rowan Road; excavation to extend the CDI to the west; erection of a glazed link between the CDI and the Mercer's Building to the south; refurbishment of the Mercer's Building including removal of the fire escape stair and introduction of new overhead door; demolition of the existing Forum Building (excluding screen to science courtyard) and erection of a new three storey Staff Hub and link with the Main Building; enclosure of spaces between the Main Building and the Staff Hub and CDI buildings by erection of covered links; installation of solar photovoltaic panels and replacement of existing plant screen to the roof of the Celia Johnson building; landscaping of the car park including changes to the entrance gates and the erection of a new single storey maintenance building in the southeast corner of the car park; reconfiguration of some spaces in the Main Building over lower ground, upper ground and first floor for administration spaces, meeting spaces, pastoral spaces and toilet and locker space; landscaping works to the science courtyard and other associated works'

3.4 The proposal can be split into five main areas (with their associated works), and will be carried as Phase 2 and Phase 3 of the overall master plan (though this phasing is flexible and subject to change). This is summarised below:

3.5 Phase 2:

- Demolition of the existing Rosalind Franklin Building and construction of a new 2/3 storey Centre for Design and Innovation (CDI) (1240 sqm).
- Construction of a glazed link between the DCI and the Mercer's Building and refurbishment of the Mercer's Building (and associated works).
- Construction of a new maintenance building.

3.6 Phase 3:

- Demolition of the existing Forum Building and construction of a new three storey staff hub (1110 sqm) (and associated works).
- Internal works and reconfiguration of spaces in the Main Building.
- Landscape works to the car park and science courtyard.

3.7 This application for planning permission is being considered alongside a concurrent application for Listed Building Consent (ref. 2020/01525/LBC). This report covers both applications.

4.0 PUBLICITY AND CONSULTATIONS

Public Engagement

4.1 A Statement of Community Involvement (SOI) supports the current planning application and summarises the pre-application engagement undertaken in respect of the next phases of the master plan.

- 4.2 Initially, immediate neighbours on Rowan Road were invited to attend an early presentation of the emerging proposals on 27th January 2020. This was attended by 5 residents.
- 4.3 This was followed by two stages of public consultation to consult with local residents and businesses in the vicinity of the School and also local stakeholders who may have had an interest in the site. Various methods of consultation were used for both stages. Leaflets were sent to 759 residents and businesses, as well as local stakeholders. Further publicity was generated with an advert on the MyLondon website and in its associated newspapers. A range of feedback opportunities, including a paper feedback form, project email address, Freephone number and a Freepost address were provided.
- 4.4 The first exhibition, held Saturday 29th February 2020 and 2nd March 2020, invited initial feedback on the key concepts for the next phase of the master plan. The exhibition was attended by a total of 67 people. Of these, 30 left feedback with 22 very positive, 7 generally positive and 1 neutral.
- 4.5 Due to Covid-19 SPGS were unable to hold a face-to-face event as part of the Stage 2 consultation. Instead, in May 2020, a digital-first consultation was offered which shared the detailed proposals. Hard copies of the plans were made available upon request for anyone unable to access the plans online. In total, 7 residents, stakeholders and school parents participated in the Stage 2 consultation. Of these 4 provided feedback with 2 positive, 1 neutral and 1 unsure.
- 4.6 The applicant states that the comments received have helped to shape the scheme.

Statutory Consultation:

- 4.7 The planning application was publicised by way of letters sent to 158 surrounding properties. Site and press notices were also published for both the planning and listed building consent applications.
- 4.8 32 representations have been received across both applications, from 27, 28, and 31-39 (inclusive) Brook Green; 12, 32 and 44 Rowan Road; Larmenier and Sacred Heart Catholic School; and the R.C. Diocese of Westminster, objecting to the application.
- 4.9 The objection comments can be summarised as follows:
- CDI and Staff Hub:
- Impact on listed buildings and conservation area
 - The listed buildings are significant
 - Overdevelopment of the site
 - The scale, height and mass is significantly different to what is currently built
 - Balance needed between the built form and open space ratio
 - Modern buildings not in keeping with the listed buildings and conservation area
 - Staff Hub would be highly visible from Brook Green

- Brook Green will become a school campus rather than an historic residential area
- Light pollution
- Loss of privacy to houses on Brook Green from new windows in Staff Hub
- Overbearing impact to houses and gardens on Brook Green
- Noise from new plant
- Tunnelling effect to the site
- Overshadowing to houses and gardens on Brook Green
- Ownership of boundary wall with Rowan Road should be clarified
- Development should be kept within the site
- Four tall ventilating towers on top of CDI are visually intrusive
- Residents were informed the CDI building would be of similar scale and height to the Mercer's Building
- Overbearing impact and loss of light to houses and gardens on Rowan Road caused by new timber fence
- The existing chain fence is covered in climbers which are more visually acceptable than the new timber fence

Maintenance Building:

- Harmful to the conservation area
- Modern building not in keeping with the listed buildings and conservation area
- School is already overdeveloped
- Loss of open space
- Noise from use, machinery, side window and roof-based plant
- Noise report is flawed (not taken from correct location, not undertaken by an independent body, incorrect properties identified)
- Proposed hours of use would lead to noise at unacceptable times, in particular at weekends
- Proposed building sits adjacent to a "quiet room" within neighbouring school.
- Size is excessive
- Ground levels with neighbouring properties on Brook Green not accurate on plans or clear
- Difficult to read the plans, no height labels
- Air condensers/plant to be included on roof are not shown on plans which would add to the height
- Overshadowing of/loss of light to houses and gardens on Brook Green
- Over dominating to houses and gardens on Brook Green
- Should be located away from neighbouring properties
- The roof should be lowered
- The building should not exceed the height of the boundary wall
- The ground levels should be lowered to reduce the building height
- The building should be located away from neighbouring properties
- The impact to all trees in neighbouring gardens has not been considered
- Any new trees should not impact neighbouring trees
- Green wall should be included
- Residents were informed the maintenance building would be no higher than the existing boundary wall
- Residents not made aware of changes to the building following the public consultation.

Highways:

- Reduction to on-site car parking spaces will add strain to on-street parking in the vicinity
- Adequacy of site for parking, loading, turning and highway safety
- Traffic generation
- Construction impacts
- Cycle shelter would have an impact on outlook
- Changes to entrance gates will increase idling and noise pollution

Other matters:

- There is no planting shown in the garden of no. 26
- Increased flooding
- School has failed to respond well to neighbours' previous concerns over rubbish collection and machinery noise
- Application submitted in holidays
- Residents not given enough time to consider the proposals
- Lack of engagement with residents
- Design changed since consultation without informing residents
- Impact to bats

4.10 The Planning issues will be addressed in the main body of the report, set out in Section 6 below.

Amenity groups:

4.11 Friends of Brook Green and Brook Green South Residents Association were consulted on the planning application and have not made any comments.

4.12 The Hammersmith Society were consulted on the both the planning application and listed building consent application and have not made any comments.

4.13 Hammersmith and Fulham Historic Buildings Group were consulted on both the planning application and listed building consent application and have not made any comments.

4.14 National Amenity Societies And Theatre Trust were consulted on both the planning application and listed building consent and have not made any comments.

Technical Consultations:

4.15 Historic England consider the proposals to cause some harm to the significance of the school site, through the removal of original and appealing features that provide evidence of the original purpose of the Forum and Rosalind Franklin buildings, and as surviving elements from the schools conception as an early female only school. They consider the harm to the significance of the school site to be less than substantial in terms of the NPPF. It is noted the reuse of the roof structure of the Rosalind Franklin Building and bricks from both the Rosalind Franklin and Forum buildings have not been implemented into the final proposals, which would have otherwise helped to mitigate the harm. However, it

is recognised that there are other substantial benefits that these proposals will provide to safeguard the sites continued use as a school. They have stated that they are content for the Council to determine the application as it sees fit and they have issued the necessary authorisation for it to do so with regards to the application for listed building consent.

- 4.16 The Environment Agency has commented and raised no objections.
- 4.17 Thames Water advise that in respect to water network and water treatment infrastructure capacity they would not have any objection subject to conditions and an informative. Further details were sought in respect to the drainage strategy and surface water. A revised Flood Risk Assessment (FRA) and Sustainable Drainage Strategy has been submitted.
- 4.18 Hammersmith and Fulham Disability Forum Planning Group consider the proposals are well thought through with regards to inclusive design and recommend all-inclusive design statements are evidenced on compliant drawings.
- 4.19 The London Fire and Emergency Planning Authority were consulted on the planning application and have not made any comments.
- 4.20 Metropolitan Police Service Designing Out Crime Officer confirms he met with the architect prior to the submission of the application, and the school should achieve full Secured by Design accreditation when completed, providing the agreed SBD security requirements have been met.

Design Review Panel:

- 4.21 The scheme was presented to the Councils Design Review Panel 18th March 2020. Overall the Panel felt that proposals were high quality additions which create a good balance with the existing buildings.
- 4.22 The Panel did make a number of recommendations in terms of the Rosalind Franklin building. In particular, it was felt the building could be more confident in its approach in terms of its massing to establish a better hierarchy with the existing 1990s building to the south. The design of the brickwork, parapets, roof/wall junctions and glazed link would be fundamental to getting this approach right. Finally, it was not clear if the building is intended as a sister to the Forum Building or should enjoy its own character and sense of identity. It was agreed a careful balance is needed between retaining residential amenity and securing the right architectural approach to enable the building to be of an ambitious character.
- 4.23 The Forum Building in particular was very well received by the panel. Further consideration of maintenance and access requirements was suggested to ensue this is not visually intrusive.
- 4.24 The panel also felt that further consideration to the maintenance building in the corner of the courtyard was required to consider a modest uplift in scale/height to create a stronger sense of enclosure to the courtyard and stitch the whole master plan together.

5.0 POLICY FRAMEWORK

- 5.1 The Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011 are the principal statutory considerations for town planning in England.
- 5.2 Collectively the three Acts create a plan led system which requires local planning authorities to determine planning applications in accordance with an adopted statutory development plan unless there are material considerations which indicate otherwise (section 38(6) of the 2004 Act as amended by the Localism Act).
- 5.3 In this instance the statutory development plan comprises the London Plan (2016) and the Local Plan (2018). A number of strategic and local supplementary planning guidance and other documents are also material to the determination of the application.

National Planning Policy Framework (February 2019)

- 5.4 The National Planning Policy Framework (NPPF) came into effect on 27 March 2012 and was revised in 2019 and is a material consideration in planning decisions. The NPPF, as supported by the Planning Practice Guidance (PPG), sets out national planning policies and how these are expected to be applied.
- 5.5 The NPPF does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up to date Local Plan should be approved and proposed development that conflicts should be refused unless other material considerations indicate otherwise.

London Plan

- 5.6 The London Plan 5.12 The London Plan was published in July 2016. It sets out the overall strategic plan for London and a fully integrated economic, environmental, transport and social framework for the development of the Capital over the next 20-25 years. It forms part of the development plan for Hammersmith and Fulham

Draft London Plan

- 5.7 The draft London Plan was published for public consultation in 2017. Following an Examination in Public of the draft Plan from January to May 2019, the Panel issued their report and recommendations to the Mayor in October 2019. In December 2019, the Mayor of London submitted his "Intend to Publish" version of the London Plan to the Secretary of State for his consideration. The 'Intend' version includes a schedule of which recommendations the Mayor is intending to accept or not and the Secretary of State has 6-weeks to review this. Once adopted, the new London Plan will supersede the current London Plan. As the document is in its late stages towards adoption, it is considered that relatively significant weight should be applied to the draft policies where the inspector had a more favourable view in determining this application

London Plan

- 5.8 The Council adopted the new Local Plan on 28 February 2018. The policies in the Local Plan together with the London Plan make up the statutory development plan for the borough. The Planning Guidance Supplementary Planning Document (SPD) (February 2018) is also a material consideration in determining planning applications. It provides supplementary detail to the policies and is organised around key principles.
- 5.9 With regards to this application, all planning policies in the National Planning Policy Framework (NPPF), London Plan (2016), Local Plan (2018) and Planning Guidance SPD (2018) which have been referenced where relevant in this report have been considered with regards to equalities impacts through the statutory adoption processes, and in accordance with the Equality Act Page 132 2010 and Council's PSED. Therefore, the adopted planning framework which encompasses all planning policies which are relevant in officers' assessment of the application are considered to acknowledge protected equality groups, in accordance with the Equality Act 2010 and the Council's PSED.

6.0 PLANNING ASSESSMENT

The main considerations material to the assessment of this application have been summarised as follows:

- 6.1 Principle of Land Use
- 6.2 Design and Heritage
- 6.3 Residential Amenity
- 6.4 Highways
- 6.5 Sustainability and Energy
- 6.6 Flood Risk and Drainage
- 6.7 Air Quality
- 6.8 Ground Contamination
- 5.9 Noise and Vibration
- 5.10 Arboriculture, Ecology and Biodiversity
- 5.11 Accessibility
- 5.12 Security

6.1 Land Use

- 6.1.1 The NPPF paragraph 94 states that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted. Paragraph 121 states that local planning authorities should make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.

- 6.1.2 The NPPF is supported by London Plan Policy 3.16 which states development proposals which provide high quality social infrastructure (e.g. community, cultural and recreation facilities) will be supported in light of local and strategic social infrastructure needs assessments. Policy 3.18 states that development proposals which enhance education and skills provision will be supported, including new build and expansion of existing educational purposes.
- 6.1.3 Draft London Plan Policy S3 seeks to maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures. Paragraph 5.3.1 recognises good quality education and training are vital for supporting people into sustainable employment, which is also essential to London's continued economic success.
- 6.1.4 In line with the London Plan Local Plan Policies CF1 and CF2 support the improvement and/or expansion of secondary schools.
- 6.1.5 The site has a long-established educational use which would continue and be enhanced under the proposals.
- 6.1.6 The application would enhance the existing facilities on site to meet the needs of the existing pupil roll. It is not proposed that pupil numbers would increase as a consequence of the development, and no additional classes or year groups are proposed. However, the school has agreed to a condition which restricts the overall number of pupils to 800, as per the Phase 1 works approved under 2015/02035/FUL.
- 6.1.7 The aim of the proposals is to enhance the education facilities at the School in line with the current educational landscape. To achieve this there is a requirement for additional space and rationalisation, up to date technology, partnership working, improved well-being and pastoral spaces, and improved accessibility and security.
- 6.1.8 In more detail, the School recognises that its lack of provision for technology and engineering at a girls' school is outdated and does not meet the desire for these subjects from the students. The new Centre for Design & Innovation (CDI), using the site of the existing Rosalind Franklin Building and the adjacent Mercer's Building, will provide a new type of learning environment to boost the School's technology teaching. The building has been designed to be as adaptable as possible to different uses and ways of teaching and learning, both now and in the future, with a series of free-flowing and flexible spaces. A large double-height flexible space at the heart of the CDI, from which all the other principal spaces can be seen and accessed, will provide space for anything from lectures to exhibitions.
- 6.1.9 The new Staff Hub on the other side of the site, using the site of the existing Forum Building, will provide a new centralised, working environment for the School's staff. Staff are currently dispersed across a number of spaces in the School. The Staff Hub will include high-quality spaces for staff to work and relax, as well as support functions such as IT and reprographics, with the aim of promoting better collaboration between staff.

- 6.1.10 By consolidating and enhancing staff spaces, other spaces within the Main Building are freed up for more effective use. The proposals for the Main Building are underpinned by a desire to improve movement and flow across the site as well as consolidation and rationalisation.
- 6.1.11 In assessing the application, Officers have also discussed the opportunities for the school to make the facilities available to the wider community. The applicant has stated that the school already has a number of links with local schools and organisations and hosts a number of partnership activities events and workshops throughout the year in term time. The school says that expanding their facilities would also enable them to expand on what they currently offer.
- 6.1.12 In line with the 2015 consent an extended Community Use Agreement and Community Use Management Plan will be secured by a legal agreement to provide the opportunity to formalise existing community use activities, including the use of facilities by other local schools and local charities and organisations.
- 6.1.13 On the basis of the above, the principle of this type of development, notwithstanding the heritage, design and amenity impacts of the works, which will be considered later in this report, is considered to be acceptable in principle in terms of both the national and local planning policies referred to above.

6.2 Design And Heritage

Policy

- 6.2.1 The NPPF states that development should respond to local character and history and the surrounding environment and setting, whilst not preventing innovation but extends this to recognise a role for change and increased densities. The NPPF advocates a positive strategy for conserving and enhancing the historic environment, taking account of (amongst other things) the desirability of new development to make a positive contribution to local character and distinctiveness. The NPPF states that economic, social and environmental gains are to be sought jointly and simultaneously in order to deliver positive improvements in the quality of the built, natural and historic environment.
- 6.2.2 In determining applications, Paragraph 192 of the NPPF states that LPAs should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses; the positive contribution that conservation of heritage assets can make to sustainable communities; and the desirability of new development making a positive contribution to local character and distinctiveness. Paragraph 193 requires great weight to be given to an asset's conservation (and the more important the asset, the greater the weight should be) when considering the impact of a proposed development on the significance of a designated heritage asset, irrespective of the amount of harm. Paragraph 196 states that where a development proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal 'including, where appropriate, securing its optimum viable use'. Paragraph 201 recognises that 'Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance'.

- 6.2.3 London Plan Policy 7.4 requires developments to provide high quality design responses to existing spaces, to create a positive relationship with street level activity and to allow 'existing buildings and structures that make a positive contribution to the character of a place to influence the future character of an area'. Policy 7.5 requires public realm to be comprehensive at a human scale through appropriate treatment such as gateways, focal points, landmarks and landscape treatment. Proposals should be informed by the heritage of an area, reinforcing the connection between public spaces and (inter alia) local features that may be of heritage significance. Proposals should further consider integration with high quality public art. Policy 7.6 sets high architectural standards for all buildings and structures, and requires these to enhance, activate and define the public realm. It allows for materials that complement but do not necessarily replicate the local architectural character.
- 6.2.4 Local Plan Policy DC1 (Built Environment) states that all development within the borough 'should create a high-quality urban environment that respects and enhances its townscape context and heritage assets. There should be an approach to accessible and inclusive urban design that demonstrates how good design, quality public realm, landscaping, heritage assets and land use can be integrated to help regenerate places.
- 6.2.5 Local Plan Policy DC2 (Design of New Build) permits new build development that is of a high design standard and compatible with the scale and character of existing development and its setting. It requires proposals to respect:
- historical context, townscape and the sense of place of a site;
 - the surrounding area scale, mass, form and grain;
 - the relationship of the proposed development to the existing townscape;
 - local design context to promote and reinforce local distinctiveness;
 - good neighbourliness and principles of residential amenity;
 - local landscape context, providing high quality landscaping and public realm with good permeability where appropriate;
 - sustainability objectives;
 - the principles of accessibility and inclusive design; and
 - the principles of Secured by Design.
- 6.2.6 Local Plan Policy DC4 (Alterations and Extensions) states that the council will require a high standard of design in all alterations and extensions to existing buildings. These should be:
- compatible with the scale and character of existing development, neighbouring properties and their setting;
 - successfully integrated into the architectural design of the existing building; and
 - subservient and should never dominate the parent building in bulk, scale, materials or design.
- In considering applications for alterations and extensions the council will take into account the following:
- a. scale, form, height and mass;
 - b. proportion;
 - c. vertical and horizontal emphasis;
 - d. relationship of solid to void;
 - e. materials;

- f. impact on skyline silhouette (for roof top additions);
- g. relationship to existing building, spaces between buildings and gardens;
- h. good neighbourliness in particular the amenities of the neighbouring properties, and other properties most directly affected by the proposal; and
- i. the principles of accessible and inclusive design.

- 6.2.7 Local Plan Policy DC8 (Heritage and Conservation) states that that the council will conserve the significance of the borough's historic environment by protecting, restoring and enhancing its heritage assets. These assets include: listed buildings, conservation areas historic parks and gardens, the scheduled monument of Fulham Palace Moated site, unscheduled archaeological remains and buildings and features of local interest. When determining applications affecting heritage assets, the council will apply the following principles:
- a. the presumption will be in favour of the conservation, restoration and enhancement of heritage assets, and proposals should secure the long term future of heritage assets.
 - b. The more significant the designated heritage asset, the greater the presumption should be in favour of its conservation; applications affecting designated heritage assets, including alterations and extensions to buildings will only be permitted if the significance of the heritage asset is conserved or enhanced;
 - c. applications should conserve the setting of, make a positive contribution to, or reveal the significance of the heritage asset. The presence of heritage assets should inform high quality design within their setting;
 - d. applications affecting non-designated heritage assets (buildings and artefacts of local importance and interest) will be determined having regard to the scale and impact of any harm or loss and the significance of the heritage asset in accordance with paragraph 135 of the National Planning Policy Framework;
 - e. particular regard will be given to matters of scale, height, massing, alignment, materials and use;
 - f. where changes of use are proposed for heritage assets, the proposed use, and any alterations that are required resulting from the proposed use should be consistent with the aims of conservation of the asset's significance, including securing its optimum viable use;
 - g. applications should include a description of the significance of the asset concerned and an assessment of the impact of the proposal upon it or its setting which should be carried out with the assistance of a suitably qualified person. The extent of the requirement should be proportionate to the nature and level of the asset's significance. Where archaeological remains of national significance may be affected applications should also be supported by an archaeological field evaluation;
 - h. proposals which involve substantial harm, or less than substantial harm to the significance of a heritage asset will be refused unless it can be demonstrated that they meet the criteria specified in paragraph 133 and 134 of the National Planning Policy Framework;
 - i. where a heritage asset cannot be retained in its entirety or when a change of use is proposed, the developer should ensure that a suitably qualified person carries out an analysis (including photographic surveys) of its design and significance, in order to record and advance the understanding of heritage in the borough. The extent of the requirement should be proportionate to the nature and level of the asset's significance;
 - j. the proposal respects the principles of accessible and inclusive design;

k. where measures to mitigate the effects of climate change are proposed, the applicants will be required to demonstrate how they have considered the significance of the heritage asset and tailored their proposals accordingly;

l. expert advice will be required to address the need to evaluate and conserve archaeological remains, and to advise on the appropriate mitigation measures in cases where excavation is justified; and

m. securing the future of heritage assets at risk identified on Historic England's national register, as part of a positive strategy for the historic environment.

6.2.8 The Draft London Plan seeks to secure the delivery of good design through a variety of ways. Going beyond the expectations of the adopted London Plan, Policy D2 does the following. Part C encourages use of digital modelling techniques to analyse potential design options, and to use 3D/virtual reality to inform and engage Londoners in the planning process. Part F requires proposals to go through a design review (which must align with the Mayor's guidance on design reviews) if a scheme is referable to the Mayor and is above the design threshold in Policy D6 or a tall building is proposed in an area where there is 'no local tall building definition'. Part H seeks to ensure design quality is retained through (inter alia) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter, and the use of architect retention clauses in legal agreements 'where appropriate'.

6.2.9 Design Guidelines for development in conservation areas are included in the Council's Planning Guidance Supplementary Planning Document (2018). Key Principles AH1 and AH2 relate to the protection of heritage assets, CAG1 relates to land use in Conservation Areas, CAG2 relates to urban design in Conservation Areas, CAG3 relates to development in Conservation Areas.

Heritage designations

6.2.10 The site consists of a complex of buildings which has evolved over time. The listed buildings on the site were designed by Gerald Horsley over a thirty year period in the early twentieth century. The main school building fronting Brook Green and the connected Forum Building (former gymnasium) to the rear date from 1903 and are Grade II listed. The Rosalind Franklin Building (former swimming pool building) to the south west of the main school building was completed in 1909 and is a listed curtilage building to the main school building. The Gustav Holst Music Wing and High Mistress's House, No. 48 Rowan Road, to the west of the main school building were completed in 1913 and are both listed separately at Grade II. The Science Building to the south of the main school building was completed in 1933 and is a listed curtilage building to the main school building. The walls, gates and railings fronting Brook Green are listed separately at Grade II. Subsequently the main school site has continued to expand including the construction of the Celia Johnson building in 1983-4, the Mercer's Building in 1994, the Sports Hall in 2000, and most recently the Garden Building completed in 2018. These modern buildings are not statutory listed, not on the Local Register of Buildings of Merit and nor could they be considered as non-designated heritage assets.

6.2.11 The site is located within the Brook Green Conservation Area and the street facing listed buildings make an important contribution to the significance of the

Conservation Area. The character of this part of the Conservation Area around the historic open space of Brook Green is of a predominantly Victorian/Edwardian built residential suburb including community facilities such as churches and schools.

- 6.2.12 To the west of the site are the Grade II listed cottages at Nos. 8-46 Rowan Road and to the east are a group of houses on the Local Register of Buildings of Merit at Nos. 26-39 Brook Green.

Heritage significance

- 6.2.13 Local Planning Authorities are required to identify and assess the significance of any heritage asset affected by a proposal, including by development affecting the setting of a heritage asset (para 190 of the NPPF). This assessment shall be taken 'into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal' (para 190 of the NPPF).
- 6.2.14 The complex of listed buildings on the site has both special architectural and historic interest. Gerald Horsley is an architect of some renown and was a pupil of Norman Shaw, which is expressed in the understated architectural references to the Arts and Crafts and Queen Anne styles in the listed buildings across the site. St Paul's Girls' School represents the principal example of Horsley's work and was described by Pevsner as 'one of the best Edwardian school buildings in London'. The historic interest of St Paul's Girls' School lies in it being one of the first girls' schools in London, remaining in the building specifically designed for the purpose. St Paul's Girls' School was designed by Horsley at a time of great positive and enthusiastic change and development in the education system, and particularly the provision of education for girls.
- 6.2.15 There is group value between the listed buildings on the site and each listed building forms part of the setting of the others. However, levels of significance vary considerably between and within buildings on the site and the proposals have been informed by a detailed Heritage Report, including significance plans, which has submitted with the applications.
- 6.2.16 The main school building has highly significant elevations including the frontage to Brook Green. The red brick and stone composition in the 'Wrenaissance' style has a wealth of architectural detail demonstrating fine craftsmanship and a varied roofscape including gables, pitched roofs and tall chimney stacks. Internally the main school building contains highly significant spaces including the entrance lobby, 'The Marble' which forms the main east-west concourse at upper ground floor level, the Great Hall and the Warburg Library. Teaching spaces are typically of moderate significance while the basement containing the kitchen and dining area is largely of low significance.
- 6.2.17 The Forum Building is connected to the main school building by a narrow link corridor at basement and ground floor levels. It is complementary to the other listed buildings on the site in terms of its external design and materials, with the exception of the eastern elevation which has been rendered at some point in the past and which has harmed its significance. The western and southern elevations in particular, are competently detailed with a high quality of materials

that integrate well with the adjacent Main School building on the opposite side of the lightwell. The Forum Building has been subdivided internally since its use as a gymnasium ceased, however it is still possible to appreciate the original internal proportions and there are views up to the roof structure of the building. Officers consider that the Forum Building was clearly designed as a subservient element to the main school building with a relatively plain interior befitting its original use as a gymnasium and that it has a moderate level of significance. A characterful red brick screen with metal gates and railings links the Forum Building with the main school building and separates the lightwell between the two buildings from the Science Courtyard to the south.

- 6.2.18 The Gustav Holst Music Wing is of high significance externally. The red brick and stone elevations form a complementary element to the main school building to which the Music Wing is attached. Internally much of the building is of high significance including the Singing Hall, which remains largely intact. The historic interest of the Music Wing also derives from the tenure of Gustav Holst as Music Director during which time he wrote *The Planets*, which was first performed in the Singing Hall.
- 6.2.19 The Rosalind Franklin Building has been subdivided internally to create workshops, maintenance and storage facilities since its use as a swimming pool ceased in the 1970s, having been replaced by a new facility further to the west along Brook Green. The swimming pool tank has been covered over with a concrete slab and the original volume of the space has been lost, although the height of the roof can still be appreciated internally. Some original internal architectural features remain including a green glazed tile border, wrought iron trusses and cast iron columns. There are no windows in the elevations since the internal space is lit from above and the external appearance of the building is much plainer than the other listed buildings on the site. The boiler house element is in white glazed bricks with a stone entrance portal. There is a characterful curved red brick chimney stack from the boiler house which incorporates an arch and is attached to the rear of the main school building. Officers consider that the building has a low to moderate level of significance.
- 6.2.20 The High Mistress's House is of special architectural interest for the quality of the design, both in overall composition and detail. The understated references to architectural styles; the Arts and Crafts and the Queen Anne, are particularly fine and reveal the skill of the architect. Moreover, the group value of the High Mistress' House is very strong: the building is integral to the school as a whole and interconnects seamlessly with the contemporary Gustav Holst Music Wing (listed Grade II) which is itself connected to the main school (also Grade II).
- 6.2.21 The Science Building derives much of its architectural and historical interest via association with the main school building and group value derived from the collection of purpose built educational buildings on the site. It is a well designed school building of the early 1930s which Officers consider to be of moderate significance.
- 6.2.22 The site is located within the original core of the Brook Green Conservation Area which was designated in March 1971. A Conservation Area is defined in s.69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as an area 'of special architectural or historic interest the character or appearance of

which it is desirable to preserve or enhance'. There is an adopted Conservation Area Character Profile for the Brook Green Conservation Area. St Paul's Girls' School comprises an important element of the Brook Green Conservation Area. The listed buildings on the site that front Brook Green and Rowan Road form an important architectural group of buildings that makes a positive contribution to the character and appearance of the Conservation Area. The adjacent listed cottages at Nos. 8-46 Rowan Road are of special architectural and historic interest due to their age and as relatively intact examples of well-designed early Victorian domestic architecture. They have strong group value and make a positive contribution to the character and appearance of the Conservation Area. The adjacent houses at Nos. 26-39 Brook Green are included on the Local Register of Buildings of Merit, are of local architectural and historic interest and make a positive contribution to the character and appearance of the Conservation Area, providing an attractive frontage to Brook Green.

Impact on heritage assets

6.2.23 The Council is required to undertake an assessment of the impact of the submitted proposals on the significance of the heritage assets affected which are:

- The special architectural and historic interest and settings of the Grade II listed main school building, Grade II listed Gustav Holst Music Wing, Grade II listed High Mistress's House, Grade II listed gates, wall and railings to the Brook Green frontage and the listed curtilage Rosalind Franklin Building and the listed curtilage Science Building;
- The character and appearance of the Brook Green Conservation Area;
- The setting of the adjacent Grade II listed buildings at Nos. 8-46 Rowan Road;
- The settings of adjacent Buildings of Merit.

It is key to the assessment of these applications that the decision making process is based on the understanding of specific duties in relation to listed buildings and Conservation Areas required by the relevant legislation, particularly the Section 16, 66 and Section 72 duties of the 'Listed Buildings Act' set out below together with the requirements set out in the NPPF.

6.2.24 Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('Listed Buildings Act') states in relation to listed buildings that: 'In considering whether to grant listed building consent for any works, the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the [listed] building or its setting or any features of special architectural or historic interest which it possesses.'

6.2.25 A similar statutory duty in section 66(1) of the Listed Buildings Act applies to the determination of planning applications. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that: 'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'

- 6.2.26 Section 72 of the above Act states in relation to Conservation Area that:
'In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'

Design and assessment of impact of the proposals upon heritage significance

Masterplan

- 6.2.27 The proposals have been developed following a review of the previously consented masterplan. The original masterplan noted that opportunities to expand the educational facilities are limited due to the size and configuration of the site and the heritage designations on the site. Review of operational/future requirements of the school, have resulted in the submission of the current applications, which include proposals seeking to provide new educational facilities in purpose built buildings which would enable more efficient utilisation of floorspace, the provision of new specialist teaching facilities and co-location of administrative functions. The proposals would also vastly improve inclusive access across the site by upgrading circulation routes and aligning floor levels between different buildings to create better connections and reduce congestion as pupils move around the school. As a consequence the current proposals require the replacement of two existing buildings on the site, whose original purpose has long since been superseded by the development of new facilities and which have been converted to alternative uses in an ad hoc manner which has resulted in a sub optimal educational environment and a poor utilisation of available floorspace.

Forum Building

- 6.2.28 The Forum Building has been used as a sixth form centre and subsequently as offices since the original use as the school's gymnasium ceased. To facilitate this use, the internal layout has been significantly amended; as such, the internal layout is inefficient and much space is taken up with circulation routes to mitigate the changes in levels to the main school building and adjacent spaces. Owing to these structural, design and access challenges, further modifications/alterations to upgrade and renew the internal layout would result in limited improvements to the quality of spaces and circulation within the building; which would not meet the requirements of the school. Instead, the Forum building would be demolished and replaced with a new building on three levels to provide a staff hub. At the lower floor level the new building would be aligned with the level of the adjacent lightwell immediately to the west which acts as a circulation route between the main school building and the buildings to the south. The existing lightwell would be glazed over to provide new usable space between the new building and the adjacent dining space in the main school building. The staff hub would be connected to the main school building by a link at two levels. The proposals would significantly improve inclusive access, the connections and circulation routes between buildings and the quality of the educational environment for staff and pupils. The proposals would also deliver increased and more efficient floorspace close to the main school building replacing a building of lesser significance on a site where the scope for development opportunities is constrained.

6.2.29 The staff hub would be taller than the existing Forum Building, but would remain subservient to the main school building in keeping with the existing hierarchy of buildings across the site. To mitigate the perception of a three-storey building, the roof and upper storey are to be clad in zinc, extended down past the eaves to cover the upper storey level. This standing seam zinc roof is to be richly detailed with vertical seams. The building is to be finished in red brick to reflect the materials of the adjacent listed building with cream stone and reconstituted-stone dressings. The windows are to be contemporary linear openings flanked with decorative recessed brickwork panels. These continue up into the zinc clad upper storey and onto the pitched roof slopes. As with the proposed Centre for Design Innovation, the chimneys of the main school building are echoed in the ventilation stacks along the roof ridge. The eastern elevation facing the car park would be a significant improvement on the existing rendered wall of the Forum Building. The glazed roof over the lightwell would sit below the level of the first floor windows on the east elevation of the main school building and has been carefully designed to avoid harm to architectural features. The brick screen across the southern end of the lightwell would be retained and adapted as the entrance portal to the enclosed space between the new and existing building.

6.2.30 The loss of the Grade II listed Forum Building would cause less than substantial harm to the overall significance of the listed main school building of which it forms a part. There would also be some harm to the group value listed buildings on the site. Proposals would also cause less than substantial harm to the significance of the Conservation Area. The proposed replacement staff hub building demonstrates a high quality of design, compatible with the surrounding development and it would contribute to the evolution of the buildings on the site and complement the setting of the adjacent listed buildings and the character and appearance of the Brook Green Conservation Area. The quality of the design was strongly endorsed by the Council's Design Review Panel.

Rosalind Franklin Building

6.2.31 The Rosalind Franklin Building has been converted to workshops and maintenance facilities since its original as the school's swimming pool ceased. The design and construction of the existing building as a purpose built leisure facility, means that its latter conversion has not been particularly successful at preserving the volume or character of the original space. It also provides a noticeably poor educational environment when compared to other facilities at the school. Similar to the Forum building, owing to the structural, design and access challenges of the existing, further modifications/alterations to upgrade and renew the internal layout would result in limited improvements to the quality of spaces and circulation within the building; which would not meet the requirements of the school. Proposals illustrate the building would be demolished and replaced with a new Centre for Design and Innovation.

6.2.32 The detailed design of the proposed Centre for Design and Innovation, particularly of the roof and the connection with the Mercer's Building has been refined following advice from Officers and the Council's Design Review Panel at pre-app stage. The Centre for Design and Innovation would be gabled at north and south ends and incorporate glazed links to the Gustav Holst Music Wing, the main school building and the Mercers' Building.

- 6.2.33 The new building would have a pitched roof and would be clearly legible as a subservient element to the main school building and the Gustav Holst Music Wing. The level of detail in the rich carvings of the main school building will be reflected in the use of rich, decorative standing-seam zinc detailing for the roof, together with a mixture of warm red brick, cream stone and glass for the exterior. Along the eastern elevation of the Centre for Design and Innovation brick detailing is to be incorporated above a stone cornice and columns, a playful reversion of the brick elevations of the school and adjacent Mercers' Building, which will be particularly visible from the Science Courtyard to the south of the main school building. The roof of the glazed link would be set below the level of the first floor windows of the west elevation of the main school building to avoid obstructing light and views out.
- 6.2.34 The chimneys of the former building (and of the wider school) are prominent features and this has been reimagined in reconstituted stone to form ventilation stacks along the length of the gabled roof, visibly signalling the sustainable twenty-first century construction in a way that responds to its traditional context. A flat roofed extension would run along the western boundary adjacent to the retained brick boundary wall to the rear gardens of the listed cottages in Rowan Road. There would be a satisfactory visual relationship between the listed cottages and the Centre for Design and Innovation in views across rear gardens with the listed school buildings forming the backdrop. The existing curved red brick chimney stack between the boiler house and main school building will be retained.
- 6.2.35 The new facility would be directly accessible from the Gustav Holst Music Wing and has been designed to enable the use of these parts of the school as a self contained space out of normal school hours, in accordance with current safeguarding requirements, for school events and outreach activities. This will enable the school to provide community benefits and avoid compromising the required level of safeguarding for the rest of the site.
- 6.2.36 The proposals would significantly improve inclusive access, the connections and circulation routes between buildings and the quality of the educational environment for staff and pupils. The proposals would also deliver increased and more efficient floorspace close to the main school building replacing a building of lesser significance on a site where the scope for development opportunities is constrained.
- 6.2.37 The loss of the curtilage listed Rosalind Franklin Building would cause less than substantial harm to the significance of the listed main school building and less than substantial harm to the significance of the Conservation Area. There would also be some harm to the group value of the listed buildings on the site. This harm would be limited by the design of the replacement building, as the proposed Centre for Design and Innovation demonstrates a high quality of design, compatible with the surrounding development and it would contribute to the evolution of the buildings on the site and complement the setting of the adjacent listed buildings and the character and appearance of the Brook Green Conservation Area.

Main school building

6.2.38 There are a number of minor proposed internal interventions to various elements of the Grade II listed main school building at ground floor and basement level involving removal or erection of partition walls and some minor reorganisation of room layouts. These changes affect areas of both high and low significance. These changes are necessary to facilitate the proper functioning of the building as an inclusive and accessible school, as a consequence of the need to rearrange functions and access routes within the main school building following the completion of the new buildings and to meet current safeguarding requirements. Cumulatively the extent of the interventions, particularly through loss of historic fabric, would cause less than substantial harm, at the lower end of the scale of less than substantial harm. However, the proposals would also generate heritage benefits to some of the most significant areas of the main school building. The restoration of the original double height space of the former chemistry laboratory in the east wing of the main school building would restore the original counterpart to the double height Warburg Library space in the west wing. The removal of the unsightly 1970s archivist's room extension from the Colet Library would also generate heritage benefits through improvements to the external appearance of the listed main school building.

Science Building, Celia Johnson Building, maintenance building and landscaping

6.2.39 The proposed installation of air source heat pumps requires the replacement and increase in height of the existing plant screen on the roof of the Science Building. It is not considered that this element of the proposals would cause any harm to heritage assets or their settings. The proposed installation of photovoltaic panels on the roof of the Celia Johnson Building would also not cause any harm to heritage assets or their settings.

6.2.40 A new maintenance building would be erected in the car park on the eastern side of the site to replace the existing facility within the Rosalind Franklin Building. Clad in timber, this building would be of a modest scale, at single storey and would be of an appropriate height, mass and design for its location and would appear as a clearly subservient building to its neighbours. The use of timber cladding and installation of a green roof would soften the visual impact of the maintenance building in views from surrounding buildings. Officers consider that the building would not cause any harm to heritage assets or their settings.

6.2.41 In conjunction with the erection of the new buildings on the site the existing landscaping to the rear of the main school building and around the car park would be redesigned and levels of planting would be increased, which will improve the appearance of the site and the setting of the adjacent listed buildings.

Optimum Viable Use

6.2.42 The Planning Practice Guide states that:
'The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active

conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation. It is important that any use is viable, not just for the owner, but also the future conservation of the asset. It is obviously desirable to avoid successive harmful changes carried out in the interests of repeated speculative and failed uses. If there is only one viable use, that use is the optimum viable use. If there is a range of alternative viable uses, the optimum use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most profitable one. It might be the original use, but that may no longer be economically viable or even the most compatible with the long-term conservation of the asset. However, if from a conservation point of view there is no real difference between viable uses, then the choice of use is a decision for the owner.'

- 6.2.43 The proposals would help to secure the long term conservation of the most significant heritage assets on the site by sustaining the use of the listed buildings as a school, for which they were originally designed and which is considered to be their Optimum Viable Use. This forms an important public benefit of the proposals.

Heritage conclusion

- 6.2.44 Officers consider that the loss of the Forum Building and the Rosalind Franklin Building and some loss of fabric due to the cumulative extent of internal interventions would result in less than substantial harm to the significance of the main school listed building, some harm to the group value of the listed buildings on the site. Cumulatively the proposals will also result in less than substantial harm to the Brook Green Conservation Area. The proposals are considered to preserve the setting of adjacent listed buildings and Buildings of Merit. Harm is measured on a spectrum and the harm identified would be towards the lower end of less than substantial harm. The overall balance of harm has been minimised through careful consideration of the significance of the heritage assets affected, alongside the high quality of design of the new built elements and their relationship with buildings of highest significance across the school campus. The longer term viability of the education use of the site, and public benefits this would bring in terms of preserving and sustaining the conservation of a number of heritage assets has also been fully considered. In conclusion, the magnitude of any harm identified has been assessed as less than substantial harm and is considered to be outweighed by the public benefits the scheme would deliver as out lined in in this section.
- 6.2.45 It is considered that this is compliant with Section 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. It is considered that the proposals will deliver good quality architecture which optimises and enhances the continued viability of the education use of the site overall. The proposed development is therefore considered acceptable in accordance with the NPPF, Policies 7.1, 7.2, 7.3, 7.4, 7.5, 7.6 and 7.21 of the London Plan and Policies DC1, DC2, DC4, DC7 and DC8 of the Local Plan (2018).

6.3 Outlook, Daylight, Sunlight, Overlooking And Amenity

- 6.3.1 Local Plan Policy HO11 addresses detailed residential standards and, in seeking a high standard of design, seeks to ensure the protection of existing residential amenities; 'including issues such as loss of daylight, sunlight, privacy and outlook'. Policies DC2 and DC4 require all proposals for new builds and extensions to be formulated to respect the principles of good neighbourliness.
- 6.3.2 Planning Guidance SPD Housing Key Principles 6 and 7 seek to protect the existing amenities of neighbouring residential properties in terms of outlook, light and privacy.
- 6.3.3 In this case the key considerations are the impact to no.s 32 to 46 Rowan Road, which border the proposed CDI building and Mercer's Building to the west, and to no.s 26 to 34 Brook Green, which adjoin the reconfigured car park and maintenance building to the north, and which also have direct views of the Staff Hub.

Outlook

- 6.3.4 Key Principle HS6 of the Planning Guidance SPD states that 'The proximity of a new building or an extension to an existing building can have an overbearing and dominating effect detrimental to the enjoyment by adjoining residential occupiers of their properties' and prescribes a method for assessment of outlook.' Although it is dependent upon the proximity and scale of the proposed development, a general standard can be adopted by reference to a line produced at an angle of 45 degrees from a point 2 metres above the adjoining ground level of the boundaries of the site where it adjoins residential properties. If any part of the proposed building extends beyond these lines, then on-site judgement would be a determining factor in assessing the effect which the extension would have on the existing amenities of neighbouring properties.' Where original rear gardens are less than 9 metres depth, a measurement is taken from ground level at the boundary.
- 6.3.5 The 8 residential properties which border the proposed CDI building and the existing Mercers' Building to the west (no.s 36 to 48 Rowan Road) all possess rear gardens which measure approximately 7 metres deep. At present a brick wall runs the full length of the boundary. In this location the wall is approximately 2 metres tall (on the neighbours' side) and is topped with a semi-planted weldmesh fence of approximately 1.66 metres.
- 6.3.6 The proposals would include the removal of the weldmesh fence along the extent of wall between the new building (as well as the existing Mercers' Building) and no.s 32 to 48 Rowan Road. The new CDI building would extend to the boundary with no.s 40 to 48 Rowan Road (retaining the existing listed brick wall and providing enhanced structural stability for it). In this location the part of the proposed building would typically rise above the existing boundary wall by approximately 1.08 metres, some 0.58 metres less than the existing weldmesh fence and will be set back slightly so as not to take any support from the wall. The height of CDI then rises to approximately 2.28 metres above the existing boundary wall at its northern end, although this impacts only a portion of 46 Rowan Road and the High Mistress' House, which is in the ownership of the

school. Where the CDI building meets the boundary, high quality stone cladding is proposed, with a semi-intensive green roof on the flat areas of roof providing additional visual amenity for neighbouring residents.

- 6.3.7 In terms of Key Principle HS6 the proposed building where it meets the boundary wall would infringe an angle of 45 degrees taken from both the adjoining ground level and from on top of the existing boundary wall (2 metres above the ground level of the neighbouring properties). However, as mentioned above, in the most part the building would be lower than the weldmesh fence it replaces. In considering the main portion of the proposed CDI building (with its pitched roof) this matches the position of the demolished Rosalind Franklin Building, and the proposed ridge line is very similar to the existing level of the lantern rooflight that runs along the building. In terms of Key Principle HS6, this part of the proposed building would sit below the 45 degree line (including the ventilation chimneys), when drawn from the top of the existing boundary wall (2 metres above ground level), and only marginally impinges the line when drawn from ground level. When viewed from the windows of the neighbouring properties, the mass of the new building will almost similar to the existing Rosalind Franklin Building, and will entirely sit in front of the Main Building behind, thus although the eaves height is increasing, the portion of sky visible from the properties is not affected. This is corroborated by the findings of the Daylight and Sunlight Impact Study, which is discussed later.
- 6.3.8 In terms of no.s 32 and 38 the existing weldmesh fence would be replaced by new timber screening some 0.58 metres less than the existing fence.
- 6.3.9 On this basis it is not considered the proposed CDI building would not significantly worsen the outlook of no.s 32 to 48 Rowan Road to such a degree that be detrimental to the amenities of those neighbours and in turn warrant a refusal of planning permission.
- 6.3.10 Concern has been raised from the residents of Brook Green in terms of loss of outlook and overbearing impact caused by the maintenance building which will be located to the rear of their gardens. During the course of the application the design of the maintenance building was amended to reduce the height of the building where it is closest those residential properties.
- 6.3.11 Space on the main school site is extremely limited. The eastern corner of the site was chosen for the maintenance building due to its access to manage incoming deliveries and contractors visiting site. From a safeguarding point of view the location also allows external contractors who will use the building to be kept away from student areas as much as possible.
- 6.3.12 At present, a brick wall of varying heights forms the northern and eastern boundaries of the car-park, topped in places with a semi-planted trellis or weld-mesh fence (for example on the eastern boundary with the Sacred Heart and Larmenier School). The four residential properties which border the maintenance building to the north (no.s 31 to 34 Brook Green) all possess long rear gardens which measure at least 20 metres deep. In this location, immediately north of the proposed maintenance building location, the boundary wall is around 1.95 metres high on the school's side, and 2.45 metres high on the neighbours' side.

- 6.3.13 In terms of Key Principle HS6 as the northern boundary wall at 2.45 metres high already exceeds 2 metres on the neighbours' side it would be reasonable to measure the angle of 45 degrees from the top of the boundary wall.
- 6.3.14 It is noted the ground level on the school site is around 0.5metres higher than the neighbouring ground level. To minimise the scale of the building in response to concerns raised by the neighbouring residents, the roof of the maintenance building along the northern boundary has been staggered so that the height now steps away from the boundary. The building would be a maximum height of 3.99 metres, as measured from the ground level of the School carpark. From the neighbours' ground level the extension would step up from 3.39 metres, where it is closest those residential properties, to 4.49 metres. As a result of the amended design, the entirety of the new mass would sit below the 45 degree line drawn from the top of the existing boundary wall. It is also confirmed that there will be no additional plant (for example condensers) located on the roof of the proposed building which may otherwise add to the overall height. Instead, these will be located on the northern elevation, out of sight and acoustically distant from the neighbouring gardens.
- 6.3.15 Notwithstanding this, it is noted that the boundary with the neighbouring gardens is in the most part densely planted, with some trees and wall growing shrubs and bushes which provide natural screening even in later winter / early spring. No. 32 Brook Green has an outbuilding adjacent to the northern boundary which also provides some screening.
- 6.3.16 On this basis, due to the stepped roof design, together with the distance from the rear elevations of the adjoining properties (some 20 metres), officers are satisfied that the proposed maintenance building as amended would not significantly worsen the outlook of no.s 31 to 34 Brook Green to such a degree that be detrimental to the amenities of those neighbours and in turn warrant a refusal of planning permission.
- 6.3.17 A modular timber cycle shelter with galvanised steel columns would be located adjacent to the rear gardens of no.s 31 and 30 Brook Green. The shelter would be open from all sides and would have a sedum green roof. Due to the limited height and lightweight design it is not considered the shelter would impact adversely upon the outlook of those properties.

Daylight, Sunlight, and Overshadowing

- 6.3.17 The NPPF (Paragraph 123 part c) and footnote 37 states that daylight and sunlight guidance should be applied flexibly 'where they would otherwise inhibit making efficient use of a site', so long as they continue to provide adequate living standards.'
- 6.3.18 London Plan Policy 7.6 requires new buildings and structures to ensure that they do not cause unacceptable harm to the amenity of surrounding land and buildings in relation to a number of factors, including overshadowing.
- 6.3.19 The Mayor's Housing SPG Policy 7.6 makes clear that 'an appropriate degree of flexibility' should be applied when assessing the impacts of new development on surrounding properties and within developments.

- 6.3.20 The British Research Establishment (BRE) guide on 'Site layout planning for daylight and sunlight', set out good practice for assessing daylight and sunlight impacts for new development. The introduction to the guide however stresses that it should not be used as an instrument of planning policy and should be interpreted flexibly because lighting is only one design factor for any scheme.
- 6.3.21 The applicant's Daylight and Sunlight report which has been carried out in line with BRE considers the potential impacts of the proposed development on daylight, sunlight and overshadowing on the existing neighbouring residential properties of 38 to no.s 46 (even) Rowan Road to the west, and no.s 26 and 27 Brook Green to the north, comparing the existing and the proposed situations. The report concludes all windows, rooms and amenity areas within the surrounding properties, will meet the numerical targets set out within the BRE Guidelines for daylight and sunlight.
- 6.3.22 The BRE guide states that if a new development does not breach an angle of 25 degrees taken from the centre of the lowest window within the opposing elevation it is unlikely daylight and sunlight would be significantly affected. In this case the proposed maintenance building would not breach an angle of 25 degrees taken from the ground floor windows in the opposing rear elevations of no.s 31 to 34 Brook Green and therefore the impact to those properties has not been assessed against BRE guidance.

Daylight

- 6.3.23 The BRE Guidance sets out three different methods of assessing daylight to or within a room, the Vertical Sky Component (VSC) method, the plotting of the no sky-line (NSL) method and the Average Daylight Factor (ADF) method. Although the BRE Report (Appendix F) states that 'Use of the ADF for loss of light to existing buildings is not generally recommended'.
- 6.3.24 The VSC method measures the amount of sky that can be seen from the centre of an existing window and compares it to the amount of sky that would still be capable of being seen from that same position following the erection of a new building. The BRE guide advises that if the VSC is greater than 27% then enough skylight should still be reaching the window of the existing window. If the VSC is both less than 27% and less than 80% of its former value, occupants of the existing building will notice the reduction in the amount of skylight.
- 6.3.25 The NSL method is a measure of the distribution of daylight at the working plane within a room. It is similar to the VSC approach in that a reduction of 0.8 times in the area of sky visibility at the working plane may be deemed to be noticeable.
- 6.3.26 The submitted Daylight and Sunlight Assessment demonstrates that all windows tested within 40-46 Rowan Road and 26 and 27 Brook Green would fall within BRE guidance, with no losses of daylight greater than 4.0% of the VSC or 2.8% of the NSL (up to a 20% reduction generally being considered noticeable). Officers are therefore satisfied that there would be no detrimental impact on daylight to neighbouring occupiers.

Sunlight

- 6.3.27 To assess loss of sunlight to an existing building, the BRE guidance suggests the Annual Probable Sunlight Hours (APSH) method. The APSH predicts the sunlight availability during the summer and winter for the main windows of each habitable room that faces 90 degrees of due south. The summer analysis covers the period 21 March to 21 September, the winter analysis 21 September to 21 March. The BRE Guidance states a window may be adversely affected if the APSH received at a point on the window is less than 25% of the annual probable sunlight hours, or at least 5% of the annual probable sunlight hours during the winter months and the percentage reduction of APSH is 20% or more.
- 6.3.28 The submitted Daylight and Sunlight Assessment demonstrates that all windows tested within 40-46 Rowan Road and 26 and 27 Brook Green would fall within BRE guidance, with no losses of sunlight greater than 15% of the APSH (up to a 20% reduction generally being considered noticeable). Officers are therefore satisfied that there would be no detrimental impact on sunlight to neighbouring occupiers.

Overshadowing

- 6.3.29 The BRE Guidelines recommend that for it to appear adequately sun lit throughout the year at least half of a garden or amenity space should receive a least 2 hours of sunlight on 21 March. If, because of new development, an existing garden or amenity area does not meet the above, and the area which can receive 2 hours of sunlight on the 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable.
- 6.3.30 The submitted Daylight and Sunlight Assessment also includes an overshadowing analysis of the impact of the proposed CDI building on the residential gardens of 38 to 46 Rowan Road to the west, comparing the existing and the proposed situations. The results of the analysis show that any reduction to sunlight would be negligible, with all amenity areas retaining direct sunlight of at least 2 hours across more than 50% of their area on 21st March, in accordance with BRE guidance. Officers are therefore satisfied that there would be no detrimental impact to neighbouring occupiers as a result of overshadowing.

Privacy

- 6.3.31 Within the 'link' element between the new CDI building and the refurbished Mercers' Building, the roof panels and top panel of the wall facing the properties on Rowan Road will be opaque. Details of the obscure glazing will be secured by a condition. There are no other west-facing windows on the CDI besides high level rooflights, which can't be looked out of. It is proposed to remove the existing semi-planted weldmesh fence which tops the brick boundary wall as far south as the southern side of the Mercers' Building and replace this with timber screening with a splayed design to maintain a sense of privacy from the windows in the Mercers' Building which would otherwise be exposed from the removal of the weldmesh fence. While residents could use this as a support to continue to grow planting up a condition will secure final details to ensure

privacy is maintained. Details of the maintenance of the planting pods on the roof of the CDI building adjacent to the boundary wall will be secured by a condition to ensure there is no undue loss or privacy.

- 6.3.32 The existing Forum Building does not contain windows to the east elevation, fronting the existing car park. The new Staff Hub would introduce windows at both ground and first floor level. Residents of the properties on Brook Green to the east have raised concerns that the new windows would cause unacceptable overlooking and loss of privacy. However, the nearest window on no. 26 Brook Green (which is owned by the School and used by the caretaker) would be in excess of the minimum 18m minimum separation distance required under Planning Guidance SPD Key Principle HS7. On this basis it is not considered the proposed Staff Hub would result in loss of privacy to such a degree that be detrimental to the amenities of those neighbours and in turn warrant a refusal of planning permission.
- 6.3.33 There would be no overlooking from the maintenance building. The plans have been amended to omit the originally proposed window from the northern elevation. The only fenestration would now face into the site.
- 6.3.34 It is therefore considered that the proposal would not result in detrimental overlooking of any neighbouring residential occupiers and so would be acceptable in this regard.

Lighting

- 6.3.35 In addition to the abovementioned policies Local Plan Policy CC12 states lighting arrangements should be appropriate for the intended use, provide the minimum amount of light necessary to achieve its purpose, and provide adequate protection from glare and light spill, particularly to nearby sensitive receptors such as residential properties.
- 6.3.36 An External/Internal Lighting Assessment supports the application. The assessment identifies two areas being sensitive to unwanted light spill which are the houses at Rowan Road and Brook Green. Detailed lighting simulations have therefore been carried out to ensure that new lighting installation has no negative impact in terms of light spill.
- 6.3.37 The new CDI building has a number of roof lights approximately 10m from the rear façade of the properties on Rowan Road. The links will also have glazed roofs. In this case all luminaires will focus their light downwards to reduce risk of light spillage through the roof lights. The lighting simulation confirms any light spillage would be with well below the permissible standards. Additionally, the lighting installation will be controlled to only turn on when presence is detected out of hours.
- 6.3.38 In the parking area in the east near the Staff Hub lighting installation is proposed to be replaced with efficient LEDs. The light fixtures have been selected to minimise potential light spillage and light being emitted only downwards. The post height has been adjusted to avoid light spill into the neighbours garden and is between 2m and 3m depending on the post's location. The simulation results show that the gardens would receive negligible

amounts of light from the new installations. Additionally, the lighting installation will be controlled to only turn on when presence is detected out of hours.

- 6.3.39 In the courtyard area tree uplighters and low-level linear LEDs are proposed for safe access are proposed. However, this area is surrounded by the School's own buildings and no issues of light spill are expected.
- 6.3.40 The Environmental Protection team have considered the proposals and raise no objections subject to a condition to ensure lighting accords with the Guidance Notes for The Reduction Of Light Pollution.
- 6.3.31 In summary, based on the above, it is not considered the proposal would result in significant harm to the amenities of neighbouring occupiers in terms of outlook, privacy, daylight/sunlight and over-shadowing. And subject to conditions, the proposal accords with the policies cited above.

6.4 Highways

- 6.4.1 Paragraph 108 of the NPPF states that applications for development should ensure that appropriate opportunities to promote sustainable transport modes are taken and that safe and suitable access to sites can be achieved. Paragraph 109 states development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual impacts on the road network would be severe. Paragraph 111 states all developments that will generate significant amounts of movement should be required to provide a travel plan, and should also be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.
- 6.4.2 London Plan Policies 6.1, 6.3, 6.9, 6.10, 6.11 and 6.13 set out the intention to encourage consideration of transport implications as a fundamental element of sustainable transport, supporting development patterns that reduce the need to travel or that locate development with high trip generation in proximity of public transport services. The policies also provide guidance for the establishment of maximum car parking standards. Policies 5.16 and 5.17 are relevant to waste and recycling. These are supported by Policies T1-T7 of the Draft London Plan.
- 6.4.3 Local Plan Policy T1 sets out the Council's intention to 'work with strategic partners to improve transport provision, accessibility and air quality in the borough, by improving and increasing the opportunities for cycling and walking, and by improving connections for bus services, underground, national and regional rail'.
- 6.4.4 Local Plan Policy T2 relates to transport assessments and travel plans and states "All development proposals would be assessed for their contribution to traffic generation and their impact on congestion, particularly on bus routes and on the primary route network".
- 6.4.5 Local Plan Policies T3, T4, and T7 relate to opportunities for cycling and walking, vehicle parking standards, blue badge holders parking and construction logistics.

- 6.4.6 The above policies are supported by Key Principles TR1 -TR4, TR7, TR21 and TR27 of the Planning Guidance SPD.
- 6.4.7 Local Plan Policy CC7 sets out the requirements for all new developments to provide suitable facilities for the management of waste. Planning Guidance SPD Key Principles WM1, WM2, WM7 and WM11 are also applicable which seek off-street servicing for all new developments.
- 6.4.8 In accordance with the above policies a Transport Statement, draft Delivery and Servicing Plan, and draft Demolition and Construction Logistics Plan have been prepared to support the planning application. The School has an existing Travel Plan in place, prepared in line with the TfL STARS accreditation scheme, and this has also been submitted alongside the application.

Access

- 6.4.9 There are no changes proposed to the vehicle access into the car park which is gated where it meets Brook Green. However, the existing car park will be modified to accommodate the maintenance building, and also to improve service access and security.

Trip generation

- 6.4.10 The application would enhance the existing facilities on site to meet the needs of the existing pupil roll. Currently the school has 775 pupils and 230 members of staff. It is not proposed that pupil numbers will increase as a consequence of the development, however the school has agreed to a condition which restricts the overall number of pupils to 800 as pupil numbers can fluctuate due to the number of admissions each year. The Partnerships' activity, while being improved, will not cater for more visitors at any one time, and events involving numbers over 100 will continue to take place in the school's existing facilities. The existing start and finish times for the School will also remain.
- 6.4.11 Therefore, the impact on the public highway or on public transport as a result of the proposals is expected to be negligible.

Travel Plan

- 6.4.12 The School currently has a Travel Plan (TP) in place. The TP has gained a Silver STARS accreditation and is due to be updated in Autumn 2020. The TP encourages staff, pupils and visitors to travel to school using sustainable means and will continue to do so. As stated above, the proposed facilities would not result in a material increase in trip generation and the number of staff and pupils at the school are not set to increase. The School is very accessible by public transport with a PTAL rating of 6. It is also very accessible by walking and cycling. Therefore, currently the great majority of staff and pupils travel to school sustainably, with only 11% of pupils and 10% of staff arriving by car or motorcycle. A legal agreement will secure the submission of an updated Travel Plan prior to the first use of the development which would be subject to ongoing monitoring and review, to continue to encourage users of the development to travel by sustainable modes other than the car.

Car Parking

- 6.4.13 The on-site car park is for use by staff and visitors only and managed by the caretaker. This will continue. The re-configuration of the car park will retain 24 spaces, including 2 disabled bays, and 12 electric vehicle charging points. 2 motorcycle parking bays will also be provided. This represents a reduction of 14 parking spaces from the 38 spaces which is a benefit in reducing vehicle activity. The dimensions of the parking bays including the disabled parking bays conform to the standards set out under SPD Key principle-TR4 and TR6. Vehicle tracking drawings have been undertaken to demonstrate the suitability of the layout for access by cars using the parking spaces and fire tenders traveling along the aisle. The provision of the electric vehicle charging points will be conditioned.
- 6.4.14 It is considered that the reduction would not have a harmful impact upon parking in the vicinity of the site. The site is in PTAL area 6 meaning it has excellent access to public transport. It is also within a controlled parking zone (CPZ), which is a mechanism to regulate parking demand. Given the number of spaces provided on-site and the presence of the CPZ the majority of staff are unlikely to drive to school given the maximum stay of four hours on Brook Green and Rowan Road. Visitors may drive and will park either on-site or on-street for a short amount of time. The reduction would be managed by the implementation of the school's updated travel plan, and further by a Car Park Management Plan which will be secured by a condition.

Cycle Parking

- 6.4.15 (Cycle parking standards within the London Plan advise that schools should provide 1 space per 8 staff, 1 space per 8 students (long stay) and 1 space per 100 students (short stay). This would mean a minimum provision of 126 cycle spaces. It is considered, however, that on this existing school site this would result in an overprovision and there are site constraints which need to be taken into consideration. An assessment of the main site revealed there is no safe, or convenient area large enough to provide 126 cycle parking spaces, particularly, as pupils are not allowed to access or cross the car park for safety and security reasons. In this case, 20 spaces using 10 Sheffield stands at the Music Wing and 20 spaces using 10 Sheffield stands between the Sports Hall and Garden Building are proposed for students and staff to use. A further 10 spaces using 5 Sheffield stands are proposed in the car park for staff only to use. In total 50 cycle parking spaces would be provided on the main site. As the proposal would not principally aim to increase pupil numbers at the site, together with the site constraints, it is considered that the school's proposal for a total of 50 cycle parking spaces is a reasonable compromise position. It is proposed by the school to continue to monitor cycle usage via the School Travel Plan, and should usage exceed the proposed level of cycle parking provision in the future this would then be identified via this process and could subsequently be increased to meet demand. The cycle parking proposed under the current application will be secured by a condition.

Delivery Servicing Plan

- 6.4.16 A draft Delivery and Servicing Plan (DSP) is included as a separate document as part of the planning application, and this confirms there will be no changes to the delivery and servicing regime as a result of the development. However, the existing access gates will be modified to improve service access and security.
- 6.4.17 In more detail, the existing gates are proposed to be relocated and inset 6m from existing location off Brook Green. This arrangement allows a vehicle to pull into the school off Brook Green and wait off-street, within an air lock arrangement to mitigate roadside congestion issues, before access to the School is facilitated through an access intercom. A secondary sliding gate in line with the Staff Hub provides the school's inner secure line.
- 6.4.18 The existing bin store will remain located on-site at the front of the school, adjacent to the vehicle access. As per the existing agreement, the Council refuse vehicle will stop on-street with staff moving bins from the store to the truck on foot. It is noted neighbours previously complained of noise when the refuse vehicle used to turn on-site within the car park. A final DSP will be secured by way of condition.

Demolition and Construction

- 6.4.19 The main impact of the development in highway terms would be at the demolition and construction stages. In accordance with Local Plan Policy T7 and Planning Guidance SPD Key Principle TR21 a draft Demolition and Construction Logistics Plan has been submitted.
- 6.4.20 The Council's Highways Officer considers the draft document to be acceptable. A final DLP/CLP will be secured by a condition.
- 6.4.21 It is noted that the dropped kerb serving the development from Brook Green is not in a good condition and the proposed demolition and construction work will involve heavy construction vehicles to make use of the site which could further damage the pavement. It is therefore required that the applicant enter into a legal agreement in order to ensure repair of any damage to the public highway after the completion of the proposed works.
- 6.4.22 The Council's highway contractors will undertake any repair works on the highway in order to ensure that the works are undertaken to the council's adoptable standards and in order to ensure the disruption to the road network is minimal.
- 6.4.23 Subject to the submission of the required documents by condition and the mitigation to the impacts of the development required by way of legal agreement, officers consider that the proposed development would not detrimentally impact on the highway network and would be in accordance with the policies cited above.

6.5 Sustainability And Energy

- 6.5.1 The NPPF states that development proposals are expected to comply with local requirements and should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption and to increase the use and supply of renewable and low carbon energy.
- 6.5.2 London Plan Policies 5.1, 5.2 and 5.3 require developments to make the fullest contribution to the mitigation of and adaptation to climate change, ensure sustainable design and construction and minimise carbon dioxide emissions. Policies 5.5, 5.6, 5.7 and 5.8 require developments to provide decentralised energy, renewable energy and innovative energy technologies where appropriate.
- 6.5.3 The Mayor's Sustainable Design and Construction SPG provides guidance on the implementation of London Plan Policy 5.3 and provides a range of additional guidance on matters relating to environmental sustainability.
- 6.5.4 Draft London Plan Policy SI2 seeks to extend the extant requirement on residential development to non-residential development to meet zero carbon targets. It maintains the expectation that a minimum reduction of 35% beyond Building Regulations to be met on site (10% or 15% of which should be achieved through energy efficiency for residential development, and non-residential development). Where it is clearly demonstrated that the zero-carbon target cannot be met on site, the shortfall should be provided through a cash in lieu contribution to the borough's carbon offset fund, or off-site provided an alternative proposal has been identified and delivery is certain.
- 6.5.5 Draft London Plan Policy SI4 seeks to minimise internal heat gain and the impacts of urban heat island effect through design, layout, orientation and materials. An energy strategy should demonstrate how development proposals will reduce potential for overheating and reliance on air conditioning systems in accordance with a hierarchy that prioritises the minimisation of internal heat generation through energy efficient design and reductions to the amount of heat entering a building.
- 6.5.6 Local Plan Policy CC1 requires major developments to implement energy conservation measures by implementing the London Plan sustainable energy policies and meeting associated CO2 reduction target and demonstrating that a series of measures have been taken to reduce the expected energy demand and CO2 emissions. It requires the use of on-site energy generation to further reduce CO2 emissions where feasible. Policy CC2 seeks to ensure the implementation of sustainable design and construction measures by implementing the London Plan sustainable design and construction policies. These are supported by Key Principles set out in the Energy and Sustainable Design Construction Chapters of the Planning Guidance SPD.
- 6.5.7 As required, an Energy and Sustainability Statement has been provided with the application which provides details on the planned works.

Sustainability

- 6.5.8 In terms of sustainable design and construction, a range of measures are proposed, including: water efficiency measures including low water use appliances and time limiting controls to reduce water use; the use of sustainably sourced building materials, including some recycled materials; air pollution and noise emissions will be minimised by using low emission and low noise energy plant; the use of electric vehicles will be encouraged by including charging points in the redeveloped car park; new trees and planting will be included which will help provide a biodiversity gain for the site; and sustainable drainage measures are also proposed.
- 6.5.9 In addition to the energy/carbon reduction strategy discussed below, climate adaptation and resilience measures, and measures promoting health and wellbeing are also proposed.
- 6.5.10 The proposed approach in terms of sustainability is welcomed, and the implementation of the measures outlined in the Sustainability Statement will be conditioned.

Energy

- 6.5.11 With regards to Energy/Carbon Reduction, assessments are provided for the new CDI building, the maintenance workshop and the Staff Hub building. Energy efficiency measures are proposed such as improved levels of insulation, and better airtightness to reduce heat loss and use of natural daylight without overheating. Energy efficient ventilation is proposed with natural ventilation where possible. Energy efficient lighting and controls linked to occupancy and daylight levels will be specified to help minimise energy use. Energy will be generated on site using Air Source Heat Pumps (ASHPs) to supply hot water and heating efficiently. Solar PV panels are proposed for the roof of the Celia Johnson building.
- 6.5.12 The carbon reduction measures are calculated to provide a 54% reduction in CO₂ emissions for the CDI building and 55% for the Staff Hub compared to the Building Regulations baseline figures. This meets the 35% minimum CO₂ reduction target required by the Draft London Plan, although there is also a requirement for major schemes such as this to go further and achieve zero carbon, which can be done via a payment in lieu to offset the remaining CO₂ emissions. For the maintenance workshop, a 21% improvement is achieved through energy efficiency measures. It is not connected to the planned ASHP system due to its distance from the other two new buildings. As such this does not meet the 35% minimum CO₂ reduction target.
- 6.5.13 When considering the proposals as a whole, a 50% reduction in CO₂ reductions is calculated which leaves 5 tonnes of CO₂ to be offset with the payment in lieu. A total of £15,421 will be secured by a legal agreement.
- 6.5.14 Subject to the inclusion of a condition requiring the implementation of the submitted Energy and Sustainability Statement, together with the mitigation by way of legal agreement as set out above, officers consider that the proposed development accords with the policies cited above.

6.6 Flood Risk Drainage And Water Resources

- 6.6.1 London Plan Policies 5.11, 5.12, 5.13, 5.14 and 5.15 require new development to comply with the flood risk assessment and management requirements of national policy, including the incorporation of sustainable urban drainage systems, and specifies a drainage hierarchy for new development. Policy 5.3 identifies the efficient use of natural resources (including water) as a principle for informing the achievement of other policies in the London Plan. Policy 5.11 Part A subsection b recognises the role of green roofs and walls in delivering sustainable urban drainage objectives. Policy 5.13 further states that development should utilise SuDS unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and manage surface water run-off close to source. Policy 5.14 states that planning decisions must ensure that adequate waste water infrastructure capacity is available in tandem with development.
- 6.6.2 Draft London Plan Policy SI12 states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI13 sets out the same requirement and additionally states that proposals for impermeable paving should be refused and that drainage should be designed and implemented to address water efficiency, river quality, biodiversity and recreation.
- 6.6.3 Local Plan Policy CC2 requires major developments to implement sustainable design and construction measures, including making the most efficient use of water.
- 6.6.4 Policy CC3 requires a site-specific Flood Risk Assessment (FRA) for developments in Flood Zones 2 and 3 that: a. addresses the NPPF requirements; b. takes account of the risk of flooding from all relevant sources; c. integrates appropriate flood proofing measures where there is a risk of flooding; and d. provides structural waterproofing measures in subterranean elements and using non-return valves or equivalent to protect against sewer flooding.
- 6.6.5 Local Plan Policy CC4 requires all proposals for new development to ‘manage surface water run-off as close to its source as possible and on the surface where practicable, in line with the London Plan drainage hierarchy’. It also requires all major developments to implement SuDS ‘to enable reduction in peak run-off to greenfield run off rates for storms up to the 1 in 100-year event (plus climate change allowance)’ and to provide a sustainable drainage strategy to demonstrate how the strategy will enable these requirements. These are to be retained and maintained for the lifetime of the development, with details of their planned maintenance to be provided.
- 6.6.6 The SuDs, and Flood Risk and Water Efficiency Chapters of the Planning Guidance SPD support the above.
- 6.6.7 The school site is in the Environment Agency’s Flood Zone 3. As required, a Flood Risk Assessment (FRA) and Sustainable Drainage Strategy has been provided with the application.

- 6.6.8 The nature of the site is classified as more vulnerable but in principle the development of the site as proposed is acceptable, provided sufficient flood risk mitigation measures are integrated.
- 6.6.9 Although in Flood Zone 3, the site is well defended from flood risk from the River Thames due to the presence of the Thames Barrier and river wall. If these were breached or over-topped, the Environment Agency's modelling work shows that the site would not be impacted. Flood risk is therefore considered to be low in this respect. With respect to groundwater, the site is potentially susceptible to flood risks. Site investigations show that although groundwater is present it is some distance below the surface. However, the inclusion of structural waterproofing measures is confirmed which will help provide the required groundwater protection for the lower ground floors. Pumping of the drainage system should also help protect the lower ground floors from sewer water surcharging back into these areas. A condition will secure the implementation of the flood mitigation measures as outlined in the FRA.
- 6.6.10 The site is not in a surface water flooding hotspot although some ponding of water could occur during a heavy storm event on the site. Measures are proposed to manage stormwater as part of a SuDS Strategy, in particular green roofs are proposed on the maintenance building, Staff Hub and the CDI Building which will help reduce run-off for the most frequent storm events. The site's existing soakaway arrangements which manage some of the current stormwater by allowing it to infiltrate into the subsoils on the site will be increased. The soakaways on the site will be supplemented by a new geocellular storage tank under the new CDI building where stormwater will be stored and then released at a controlled low discharge rate into the sewers. These have been sized to take account of the existing catchment area run-off and the addition of the redeveloped parts of the site. However, it is noted that additional infiltration tests will be carried out prior to construction to confirm the soakaway design details. Therefore, a condition will require the submission of a finalised SuDS Strategy which will confirm the full details of the SuDS proposals for the site.
- 6.6.11 Subject to the inclusion of conditions requiring the implementation of the submitted Flood Risk Assessment, and the submission of a revised SuDS Strategy officers consider the proposed development to accord with the policies cited above in terms of flood risk and drainage and water resources.

6.7 Air Quality

- 6.7.1 LBHF was designated as an Air Quality Management Area (AQMA) in 2000 for two pollutants - Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). The main local sources of these pollutants are road traffic and buildings (gas boiler emissions).
- 6.7.2 London Plan Policy 7.14 seeks that development proposals minimise pollutant emissions and promote sustainable design and construction to reduce emissions from the demolition and construction of the buildings; not worsen existing poor quality air quality. Where additional negative air quality impacts from a new development are identified, mitigation measures will be required to

ameliorate these impacts. Further the Mayor of London's Air Quality Strategy provides a framework of policy which aims to improve air quality in London.

- 6.7.3 Draft London Plan Policy SI1 states that development proposals should not lead to deterioration of existing poor air quality, create any new areas that exceed air quality limits or create unacceptable risk of high levels of exposure to poor air quality.
- 6.7.4 Local Plan Policy CC10 seeks to reduce potential adverse air quality impacts arising from new developments and sets out several requirements.
- 6.7.5 The applicant has submitted an Air Quality Assessment which is an assessment of the likely significant effects on local air quality as a result of the proposed development.
- 6.7.6 The Council's Environmental Quality Team has reviewed the Air Quality Assessment. It is considered that the proposed development proposal will introduce new receptors into an area of poor air quality, and during the demolition, construction and operational phases will have an overall negative impact on existing air quality due to energy plant and transport emissions. It is considered additional mitigation measures will be required to make the development acceptable in accordance with Policy CC10.
- 6.7.7 Officers recommend that conditions be attached requiring details to be submitted for approval relating to (1) Zero Emission Heating Plant Compliance; (2) Electric Vehicle Charging Points; (3) Ultra Low Emission Strategy; and (4) Air Quality Dust Management Plan (Demolition and Construction).
- 6.7.8 Subject to the submission of the required documents by condition officers consider that the proposed development would not detrimentally impact on Air Quality and would be in accordance with the policies cited above.

6.8 Contaminated Land

- 6.8.1 Paragraph 170 of the NPPF says that the planning system should contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- 6.8.2 London Plan Policy 5.21 explains that 'the Mayor supports the remediation of contaminated sites and will work with strategic partners to ensure that the development of brownfield land does not result in significant harm to human health or the environment, and to bring contaminated land to beneficial use'. For decision-making, the policy requires 'appropriate measures' to be taken to ensure that development on previously contaminated land does not activate or spread contamination
- 6.8.3 Local Plan Policy CC9 requires a site assessment and a report on its findings for developments on or near sites known to be (or where there is reason to believe they may be) contaminated. Development will be refused 'unless practicable and effective measures are to be taken to treat, contain or control any contamination'. Any permission will require that any agreed measures with

the council to assess and abate risks to human health or the wider environment are carried out as the first step of the development.

- 6.8.4 Key principles LC1-6 of the Planning Guidance SPG identify the key principles informing the processes for engaging with the council on, and assessing, phasing and granting applications for planning permission on contaminated land. The latter principle provides that planning conditions can be used to ensure that development does not commence until conditions have been discharged.
- 6.8.5 The application is supported by Combined Geotechnical and Ground Contamination Risk Assessment, and a Ground Contamination Risk Assessment and Remediation Strategy. Land Contamination Officers consider further investigation is required.
- 6.8.6 To ensure that no unacceptable risks are caused to humans, controlled waters, or the wider environment during and following the development works conditions will be attached covering the assessment and remediation of contaminated land.
- 6.8.7 Subject to the submission of the required documents by conditions officers consider the proposed development to accord with the policies cited above in terms of land contamination.

6.9 Noise And Vibration

- 6.9.1 NPPF paragraph 170 states that planning decisions should prevent new and existing development from contributing to unacceptable levels of noise pollution. Similarly, Paragraph 180 states that planning decisions should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.
- 6.9.2 London Plan Policy 7.15 states that development proposals should seek to reduce noise by minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, a development and promoting new technologies and improved practices to reduce noise.
- 6.9.3 Draft London Plan Policy D14 states in order to reduce, manage and mitigate noise to improve health and quality of life, development proposals should manage noise by avoiding significant adverse noise impacts on health and quality of life.
- 6.9.4 Local Plan Policy CC11 seeks to control the noise and vibration impacts of developments, requiring the location of noise and vibration sensitive development 'in the most appropriate locations'. Design, layout and materials should be used carefully to protect against existing and proposed sources of noise, insulating the building envelope, internal walls floors and ceilings, and protecting external amenity areas. Noise assessments providing details of noise levels on the site are expected 'where necessary'.

- 6.9.5 Local Plan Policy CC13 seeks to control pollution, including noise, and requires proposed developments to show that there will be 'no undue detriment to the general amenities enjoyed by existing surrounding occupiers of their properties'.
- 6.9.6 For developments that have the potential to increase noise or vibration levels Planning Guidance SPD Key Principle NN1 requires the submission of a noise and/or vibration survey and report. Key Principle NN4 requires all noise generating uses, including plant, machinery and equipment, will be subject to requirements to minimise noise to relevant criteria in order to protect residential and other noise sensitive amenity. Key Principle NN7 requires the submission of a Demolition Management Plan and/or Construction Management Plan for substantial developments close to other premises.
- 6.9.7 An Acoustic Planning Report has been prepared, and has subsequently been updated in response to concerns raised by residents on Brook Green in respect to noise from the maintenance building. Noise breakout from plant as well as the from the use of the new development has been carefully considered, particularly due to the relatively close proximity of the neighbours on both the western boundary (to Rowan Road) and adjacent to the carpark (to Brook Green and Larmerier and Sacred Heart Catholic Primary School). In the revised report further background noise measurements were carried out in the car park to demonstrate that the levels are representative at that location.
- 6.9.8 Externally located plant and external louvres are proposed on the Science Building Roof, the plant room serving the Staff Hub, to the south elevation of the maintenance building, and to the Mercers' Building. The report concludes that some mitigation measures will be required to the heat pumps on the Science Building roof in order to meet the Council's plant noise egress limits. All other plant noise egress accords with the requirements of BS 4142:2014.
- 6.9.9 Noise egress from the uses and activities within the proposed buildings has also been assessed. Using the environmental noise survey, maximum noise levels have been set for egress of amplified sound from the CDI building and workshop tool noise from the maintenance building, in line with the requirements of BS 8233:2014.
- 6.9.10 To minimise egress of sound from the CDI building, it is proposed to use acoustic glass in the rooflights and windows, and the ventilation chimneys will be attenuated. The use of solid cross laminated timber (CLT) elements within the roof and walls, as well as heavy cladding materials (brick and stone) will also limit noise break-out. Where use of amplified sound is most anticipated - in the Immersive Studio - a full mechanical ventilation system has been provided, so that the space is not always reliant on its natural ventilation solution, which would be an acoustic weak point.
- 6.9.11 The Maintenance Building would accommodate an existing essential function, currently within the Rosalind Franklin Building. The use is ancillary to the School. As mentioned in the amenity section above space on the main school site is extremely limited. The eastern corner of the site was chosen for the maintenance building due to its access to manage incoming deliveries and contractors visiting site. From a safeguarding point of view the location also

allows external contractors who will use the building to be kept away from student areas as much as possible.

- 6.9.12 Noise generated from the building has been carefully considered. The maintenance building contains a workshop where noisy works with power tools will take place. To this end, a revised assessment of noise egress from the Maintenance workshop has been carried out, in accordance with BS 4142:2014, based on the use of an angle grinder as a 'worst case' activity. To mitigate noise egress, a full mechanical ventilation system is proposed, with intake and extract louvres facing away from the neighbours. Insulated walls and the use of acoustic glass in the rooflights will ensure break-out noise levels are at least 10dB below the measured background. On this basis the resultant noise levels would be below the requirements of BS 8233:2014. The maintenance building will be used from 6am to 8pm. Whilst the acoustic report confirms the use of the building between those hours would be acceptable, the School proposes the hours of use of the workshop will be limited to 8am to 5pm. Providing the noise levels accord with the noise limits of BS 8233:2014, as per the acoustic report, officers are satisfied that the noise impacts would be acceptable.
- 6.9.13 The adjoining School have identified a "Quiet Room" in a building which sits directly to the east of the proposed maintenance building. The acoustic report states the abovementioned measures proposed to control noise egress from the maintenance building to the residential neighbours will also control noise egress to Larmenier and Sacred Heart Catholic Primary School. Environmental Protection Officers agree that as the maintenance building has been designed to ensure that noise breakout will be 10dB below the ambient levels any changes to the internal noise levels in the "quiet room" will be negligible.
- 6.9.14 Separately it is proposed to replace the existing louvred plant screen on the science roof, which offers little acoustic baffling, with a better performing alternative.
- 6.9.15 The Environmental Protection team have considered the proposals and raise no objection subject to the conditions proposed regarding noise from uses and activities within the new buildings, noise from plant and machinery, and anti-vibration measures for machinery and plant. The hours of use for the maintenance building will also be conditioned.
- 6.9.16 In terms of disturbance during building works the application is supported by a Demolition and Construction Management Plan. During these phases the implementation of good industry standards, guidance and practice procedures (i.e. Considerate Constructors scheme) will be followed in order to minimise noise effects. Noise and vibration will be managed to reduce impacts, and mitigation measures have been set out within the document. The Environmental Protection team have considered the plan and are satisfied the amenity of neighbouring properties would not be adversely affected during the demolition and construction phases. The implementation of these measures as submitted will be secured by a condition.
- 6.9.17 Subject to the inclusion of conditions and the implementation of the mitigation measures proposed officers consider the proposals would not cause undue detriment to the general amenities at present enjoyed by existing surrounding

residents in terms of noise and vibration, in accordance with the above stated policies.

6.10 Arboriculture, Ecology And Biodiversity

- 6.10.1 The NPPF Paragraphs 170 and 175 relate to conserving and enhancing the natural environment. Paragraph 175, states if significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated or, as a last resort compensated for, then planning permissions shall be refused.
- 6.10.2 London Plan Policy 7.19 requires development proposals to make positive contributions to biodiversity (its protection, enhancement, creation and management) wherever possible and to prioritise improving access to nature in arrears deficient in accessible wildlife sites. Policy 7.21 of the London Plan supports the retention of existing trees of value and encourages the provision of additional trees, particularly large-canopied species, in new developments.
- 6.10.3 Draft London Plan sets more ambitious targets for ecology and urban greening, which includes a target to increase tree cover in London by 10% by 2050.
- 6.10.4 Draft London Policy G5 states that major development proposals should 'contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage'. Policy G6 (Biodiversity and access to nature) states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. Draft London Policy G7 states that existing trees of quality should be retained wherever possible or replace where necessary. New trees are generally expected in new development, particularly large-canopied species.
- 6.10.5 Local Plan Policy OS4 seeks to enhance nature conservation interest as part of new development, through initiatives such as new green infrastructure, new habitats, tree planting and brown and green roofs, whilst also protecting any significant interest on site and any nearby conservation areas. Policy OS5 seeks to retain existing trees and prevent the removal of protected trees, at the same time as encouraging the provision of new trees on development sites.

Trees

- 6.10.6 A Tree Survey was undertaken and supports the application. The survey recorded 19 trees as being significant within the context of the development proposals. Seven of the trees located in the southern half of the school site and four trees located in the north west corner of the school site, are situated away from the works. Those trees that are located near the Rosalind Franklin or Forum Buildings (seven trees) are all in planters and so can be moved if necessary.
- 6.10.7 One tree is located beyond the boundary wall, north of the car park close to where the maintenance building is to be located. The proposed maintenance building would be outside the Root Protection Area. A Tree Protection Plan and Arboricultural Method Statement will be secured by a condition to ensure the

tree is retained and to prevent harm during the course of demolition and construction works.

- 6.10.8 On this basis it is not anticipated the existing trees will be impacted by the proposals. Furthermore, the landscaping proposals seek to introduce new trees and planting to the school site and the new maintenance building has been designed with a green roof. Full details will be secured by a condition.
- 6.10.9 On this basis, the proposed development would not detrimentally impact on trees and would be in accordance with the policies cited above.

Ecology and Biodiversity

- 6.10.10 A Preliminary Ecological Appraisal was submitted with the application. The appraisal identifies the potential for disruption of nesting birds and so recommends that an ecologist be present before construction works begin, and that bird nesting boxes are provided on retained trees and buildings.
- 6.10.11 There was no evidence of roosting bats however, some of the buildings had a moderate bat roost suitability. Therefore, bat emergence surveys were undertaken by MKA Ecology in August and September 2019. The surveys did not identify any bat roosts and as such there will be no impact from the proposals on roosting bats. The survey did however identify a low level of bat activity, namely foraging along Brook Green, though it was still concluded that the site has a low value for commuting or foraging bats. In line with policy, the report recommends the provision of bat boxes to provide enhanced features for roosting bats. Additionally, sensitive lighting is suggested to support foraging bats, particularly during construction. It is also recommended that to further enhance biodiversity on the site, native British species be incorporated into any planting schemes.
- 6.10.12 In terms of Green Infrastructure, the Landscape proposals seek to improve this, for example a planted roof will be provided on the new maintenance building and above the pods on the new CDI. Native tree species will be planted in the car park, and a mixture of native and non-native species will be used for planting in other areas of the School.
- 6.10.13 Subject to the implementation of the measures outlined in the Ecological Appraisal officers consider that the proposed development would not detrimentally impact on Ecology and Biodiversity and would be in accordance with the policies cited above.

6.11 Accessibility

- 6.11.1 The NPPF, London Plan Policy 7.2, Draft London Plan D5, and Local Plan Policies DC1 and DC2 all seeks to ensure that future development achieves the highest standards of accessible and inclusive design.
- 6.11.2 Planning Guidance SPD Key Principles DA1, DA5, DA6, DA7, DA8, DA11 and DA12 all require that buildings are designed to be accessible and inclusive, both internally and externally, to all who may visit or use the building.

- 6.11.3 A key need of the School from the outset has been to improve the internal and external circulation around the site to improve general connectivity, but also fundamentally to improve accessibility. Currently there are significant barriers to potential users who are less able including limited step-free access, convoluted access routes and steep gradients. It is the School's ambition to overcome as many of these barriers as possible as part of the work under this application.
- 6.11.4 The key access improvements proposed by the refurbishment of the Main Building, the new CDI and Staff Hub buildings, and the reconfigured car park include:
- An accessible WC within the reception suite of rooms.
 - Increased provision for accessible parking. Disabled pupils, staff and visitors will be provided with 2 no. accessible parking bays within the revised car park arrangement. These will both be within 50m of the step free access within the Staff Hub building.
 - Level alignment of the replacement Rosalind Franklin and Forum buildings to provide level or step-free access from the main school entrance to all levels within the replacement buildings, Main Building and the majority of the school's buildings on the remainder of the site.
 - New passenger lifts within the Staff Hub, CDI and Mercers' buildings.
 - Additional accessible WCs in the Main Building and CDI building.
- 6.11.5 In summary, the proposals will provide fully accessible Part M compliant new-buildings and improved accessibility within refurbished areas of the Main Building. It is acknowledged that not all access issues will be resolved as part of the works proposed under the current application, but the strategic changes to accesses and the levels in the new-build components will form the basis of future improvements.
- 6.11.6 The Hammersmith and Fulham Disability Forum Planning Group were consulted prior to the submission of the application. The Group consider the proposals to be well thought through with regards to inclusive design. An Inclusive Accessibility Management Plan (IAMP) is secured and this is considered reasonable and necessary to secure appropriate accessibility as these design elements evolve.
- 6.11.7 In terms of the current application, it is considered that the proposal will provide a high-quality environment for disabled and impaired members of the community and the commitments within the Design and Access Statement are positive and deliverable by way of an IAMP secured as a condition. As such the proposal will comply with the relevant aims and requirements of the policies cited above.

6.12 Secured By Design

- 6.12.1 The NPPF seeks to ensure that planning decisions promote public safety and take into account wider security and defence requirements. They should anticipate and address all plausible malicious threats and natural hazards and create safe, inclusive and accessible places that have high levels of amenity and do not undermine quality of life, community cohesion and resilience to due crime and disorder

- 6.12.2 London Plan Policy 7.13 states that through planning decisions development proposals should include measures to design out crime in a manner that is ‘in proportion to the risk, deter terrorism, assist in the detection of terrorist activity and help deter its effects’.
- 6.12.3 Draft London Plan Policy D11 states development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects.
- 6.12.4 Local Plan Policies CF1 and DC2 seeks to ensure that new developments should support the Metropolitan Police Service to deal with safety, crime and anti-social behaviour.
- 6.12.5 Discussions have taken place between the applicant’s design team and the local police Designing Out Crime Officer. The overall security strategy and design intent is considered acceptable at this stage and the next stage of the process is to continue dialogue to agree the detail of measures to be incorporated within the development. Full final details of how the proposed development would incorporate crime prevention measures to provide a safe and secure environment, in accordance with Secured by Design requirements, will be secured by a condition.

7.0 COMMUNITY INFRASTRUCTURE LEVY (CIL) / PLANNING OBLIGATIONS

S106 Heads of Terms

- 7.1 The NPPF provides guidance for local planning authorities in considering the use of planning obligations. It states that ‘authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations and that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition’.
- 7.2 London Plan Policy 8.2 states that: ‘When considering planning applications of strategic importance, the Mayor will take into account, among other issues including economic viability of each development concerned, the existence and content of planning obligations. Development proposals should address strategic as well as local priorities in planning obligations. Affordable housing and other public transport improvements should be given the highest importance’. It goes on to state: ‘Importance should also be given to tackling climate change, learning and skills, health facilities and services, childcare provisions and the provision of small shops.’
- 7.3 Local Plan Policy INFRA1 (Planning Contributions and Infrastructure Planning) advises that the council will seek planning contributions to ensure the necessary infrastructure to support the Local Plan is delivered using two main mechanisms ‘Community Infrastructure Levy (CIL) and Section 106 Agreements (s106). The application site does not attract local borough CIL so relies on s106 for necessary infrastructure.

7.4 It is anticipated that the S106 for this development will include the following draft heads of terms

A. Land Use:

- Community Use Agreement and Community Use Management Plan

B. Traffic, transport and highways:

- Travel Plan - monitoring cost (£3,000 paid at review years 1, 3 and 5)
- S278 Works (reinstate kerbs, cover any damage to public highway and any other works required.)

B. Energy and sustainability

- Carbon dioxide emission offset contribution (approx. £15,421)

Local and Mayoral CIL

7.5 This development will be used wholly or mainly for the provision of education in connection with the existing school as such is exempt from LBHF local CIL.

8.0 CONCLUSION

- 8.1 In considering planning applications, the Local Planning Authority needs to consider the development plan as a whole and planning applications that accord with the development plan should be approved without delay, unless material considerations indicate otherwise and any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 8.2 In the assessment of the application regard has been given to the NPPF, London Plan, and Local Plan policies as well as guidance. It is considered that the proposal is acceptable in land use and design terms. The quantum of the proposed land uses and the resulting nature of the site does not give rise to any unacceptable impacts and will amount to sustainable development in accordance with the National Planning Policy Framework.
- 8.3 For the reasons set out in this report, officers consider the development would have a positive impact with substantial public gain.
- 8.4 The proposals would safeguard the long term use of the site as a school, and improve the educational environment and facilities for children and, subject to a legal agreement, the wider community.
- 8.5 The proposals are considered to be of a high quality of design having regard to the needs of the building's users and the character and appearance of the existing site, area and surrounding heritage assets. The settings of adjacent heritage assets would be preserved. The proposals would result in less than substantial harm to the significance of the listed buildings on site and the Conservation Area. Where harm has been identified to heritage assets, it has been minimised and fully justified and it is considered to be outweighed by the public benefits, including heritage benefits and securing the optimum viable use of the designated heritage assets on the site.

- 8.6 The proposed development is considered to have an acceptable impact upon the amenities and living conditions within surrounding properties with no significant worsening of daylight, sunlight, over-shadowing, overlooking/privacy, noise, and vibration impacts. Planning conditions are secured to limit the additional impacts to arise out of the development, including those during demolition/construction phases. Potential impacts in terms of air quality, light pollution, and noise would be acceptable regarding the various mitigation methods proposed which are secured by condition. In this regard, the development would respect the principles of good neighbourliness.
- 8.7 The proposal would not result in a material increase in pupil or staff numbers, and therefore the impact on the highway network, local parking conditions and on public transport as a result of the proposals is expected to be negligible. Provision is made for blue badge car parking and cycle parking. External impacts of the development would be controlled by conditions related to refuse storage, servicing, and demolition and construction logistics plans while the monitoring of the Travel Plans is secured by legal agreement. In this regard, the development would not detrimentally impact on the highway network.
- 8.8 The proposal would vastly improve inclusive access across the site and deliver a secure environment. The proposals would be environmentally sustainable.
- 8.9 A high quality development is proposed, and the principle of the improved educational environment and facilities is supported. It delivers substantial design, heritage and public benefits that are considered to outweigh the harm to designated heritage assets. Officers have taken account of all the representations received and in overall conclusion for the reasons detailed in this report, it is considered having regard to the development plan as a whole and all other material considerations that planning permission should be granted.
- 8.10 Accordingly, it is recommended that the proposal be granted subject to the conditions listed, the completion of s106

9.0 RECOMMENDATION

9.1 Recommendation for 2020/01524/FUL:

- 1) That the Chief Planning Officer be authorised to grant planning permission upon the completion of a satisfactory legal agreement and subject to the conditions listed below.
- 2) That the Chief Planning Officer after consultation with the Head of Law and the Chair of the Planning and Development Control Committee be authorised to make any minor changes to the proposed Heads of Terms of the legal agreement or conditions, which may include the variation, addition or deletion of conditions, any such changes shall be within their discretion.

9.2 Recommendation for 2020/01525/LBC:

- 1) That the Chief Planning Officer be authorised to grant listed building consent subject to the conditions listed below.

- 2) That the Chief Planning Officer after consultation with the Head of Law and the Chair of the Planning and Development Control Committee be authorised to make any minor changes to the proposed conditions, which may include the variation, addition or deletion of conditions, any such changes shall be within their discretion.