

# GREATER LONDON AUTHORITY

## Good Growth

**Nicola Rankin**

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London Borough of Harrow  
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Harrow  
HA1 2XF

**Our ref:** GLA/6055/TO/01

**Your ref:** P/1564/20

**Date:** 28 September 2020

Dear Nicola

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

**Site: Prince Edwards Playing Fields, Edgware**

**Local Planning Authority reference: P/1564/20**

I refer to the copy of the above planning application, which was received from you on 10 July 2020. On 28 September 2020 the Mayor considered a report on this proposal, reference GLA/6055/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order

The Mayor considers that the application does not yet comply with the London Plan and Intend to Publish London Plan for the reasons set out in paragraph 51 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

If your Council subsequently resolves to approve the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

If your Council resolves to refuse permission it need not consult the Mayor again (pursuant to Article 5(2) of the Order), and your Council may therefore proceed to

determine the application without further referral to the Mayor. However, you should still send a copy of the decision notice to the Mayor, pursuant to Article 5 (3) of the Order.

Please note that the Transport for London case officer for this application is Melvyn Dresner, e-mail [Melvyn.Dresner@tfl.gov.uk](mailto:Melvyn.Dresner@tfl.gov.uk).

Yours sincerely

A handwritten signature in black ink that reads "John Finlayson" with a long horizontal flourish extending to the right.

**John Finlayson**  
Head of Development Management

cc Navin Shah, London Assembly Constituency Member  
Andrew Boff, Chair of London Assembly Planning Committee  
National Planning Casework Unit, MHCLG  
Lucinda Turner, TfL

28 September 2020

**Prince Edwards Playing Fields, Edgware**

in the London Borough of Harrow

planning application no. P/1564/20

**Strategic planning application stage 1 referral**

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

**The proposal**

Outline application for redevelopment to provide four storey building with basement comprising of sporting higher education facility, student accommodation, hotel, medical diagnostic centre; plant and associated works

**The applicant**

The applicant is **Football First Ltd** and the architect is **And Architects**

**Strategic issues summary**

**Principle of development:** The proposal would result in the loss of land designated as open space, the applicant must explore opportunities to provide alternative and or enhanced sports or recreational provision with clear public benefits outweighing this loss. The proposal seeks to introduce a range use that are inappropriate for an out-of-centre location. GLA officers require further discussions with both the Council and the applicant on the rationale for the combination of uses proposed, and the appropriate scope and nature of the sequential site selection test. Whilst elements of the healthcare and educational components of the proposal may be supported where these can be demonstrated to be sustainable, there is a strong policy presumption against the hotel and student housing components.

**Affordable Student Housing:** The proposals do not include details of provision of affordable student accommodation. In the event the student housing proposals are progressed, the applicant should seek to meet the 35% threshold level of affordable student accommodation to be eligible to follow the Fast Track route. Should the scheme fail to meet the 35% threshold, the scheme must follow the Viability Tested Route, a financial viability assessment must be provided, and early and late stage viability reviews must be secured.

**Urban design:** Notwithstanding the impact of the proposals on designated open space, the proposals do not raise strategic concern in terms of overall scale, massing and design.

**Climate change:** The application should be supported by an outline energy strategy and commitment to addressing all required energy policies as required by the London Plan and energy assessment guidance.

**Transport:** Insufficient information has been provided in respect of the transport impacts of the proposals. The applicant must provide a transport assessment to enable detailed assessment of the impacts and transport policy implications.

**Recommendation**

That Harrow Council be advised that the application does not comply with the London Plan and the Mayor's Intend to Publish London Plan, for the reasons set out in paragraph 51; however, the possible remedies set out in this report could address these deficiencies.

## Context

1 On 14 July 2020, the Mayor of London received documents from Harrow Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan and the Mayor's Intend to Publish London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's consideration in deciding what decision to make.

2 The application is referable under Categories 1B of the Schedule to the 2008 Order:

- *Category 1B(c): "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."*
- *Category 3E: "Development — (a) which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and (b) comprises or includes the provision of more than 2,500 square metres of floorspace."*

3 The application was referred to Harrow's Planning committee on the 2 September with an officer recommendation for refusal for the following reasons:

- The development would give rise to inappropriate uses on the site which would be in direct conflict with the site's allocation for community outdoor sport development
- by reason of the site's low accessibility, sitting outside of a town centre and insufficient evidence to demonstrate the need for the uses proposed, would give rise to an unsustainable development
- The proposed development would result in a direct loss of protected designated open space and would not provide a use which is ancillary or appropriate to the existing open space
- The proposed development would be likely to result in a harmful, bulky and unduly dominant addition to the site and
- The proposal fails to demonstrate impacts of the development on the surrounding highway network, biodiversity value of the surrounding area, flood risk and that the development would be Air Quality Neutral

Harrow Planning Committee resolved a motion to approve, against the officer recommendation. A final decision has been deferred to a later date pending the receipt of consultation comments from the Mayor of London.

4 Once Harrow Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; to take over the application for determination himself; or allow the Council to determine it itself.

5 The Mayor of London's statement on this case will be made available on the GLA website, [www.london.gov.uk](http://www.london.gov.uk).

## Site description

6 The application site is designated Open Space and allocated for Community Outdoor Sports Use within Harrow's Core Strategy (2012). The site comprises a football stadium with a capacity of approximately 6,500, and the surrounding land which is primarily comprised of hard standing and surface car parking. The stadium and surrounding land forms part of the wider Hive Football Centre, a 17.3ha football and sports complex, including a stadium for Barnet Football Club and the London Bees Women's Football Club, grass football pitches, floodlit synthetic football pitches together with a commercial fitness centre, a medical diagnostic centre, a banqueting suite, eating and drinking facilities, ancillary buildings and community facilities. The wider site was formerly the Prince Edwards Playing Fields a former educational sports grounds. The wider site is bound residential properties fronting Whitechurch Lane to the north, and residential properties fronting Camrose Avenue to the south. Low rise residential properties and schools bound the site to the east and the Jubilee Line railway bounds to the site to the west. The site is bisected by a single north-south access road and Edgware Brook, which crosses through the centre of the site east to west.

7 The entire application is designed as Public Open Space as set out in Harrow Council's adopted Policies Map. Land to the west and running parallel to Jubilee Line Railway identified as a Site of Borough Importance for Nature Conservation. The northern third of the application site is also in Flood Zone 2. The closest town centres are Queensbury and Edgware which are 800 metres to the south and 1.3 kilometres to the north east, respectively from the site. The site is not within a conservation area and there are no listed buildings within or in the close vicinity of the site. Canons Park Estate Conservation Area is to the north on the other side Whitechurch Lane.

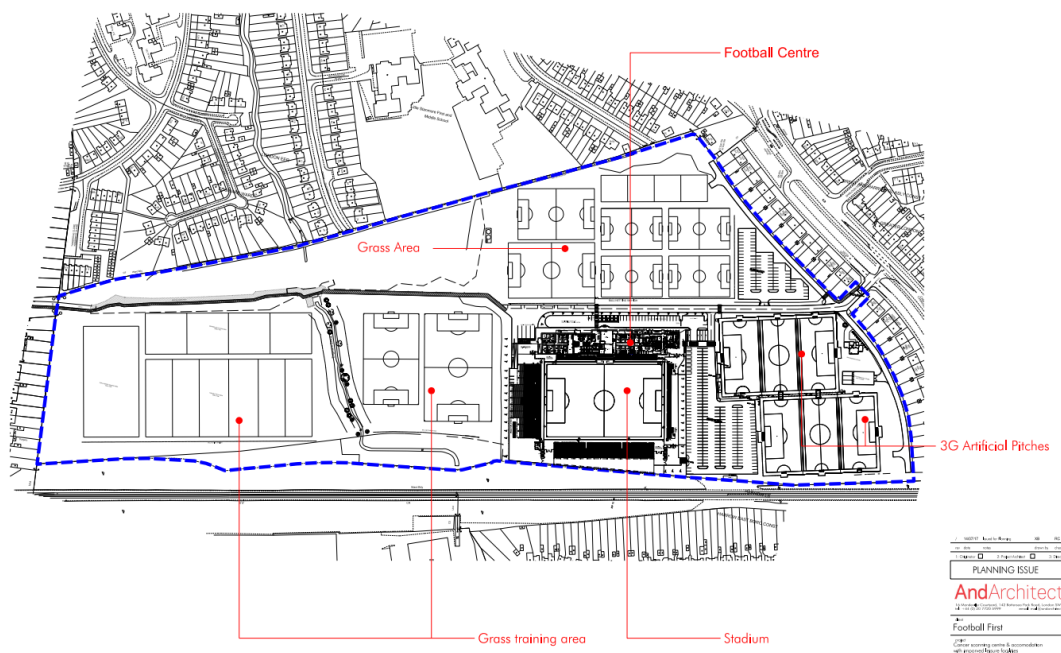


Figure 1: existing site and surrounding context

8 The site has a Public Transport Access Level (PTAL) of 3/2, on a scale of 0-6b, where 6b is highest. Jubilee line stations' Canons Park Station and Queensbury Station are 190m north, and 850m south, respectively. Bus stops are on Whitchurch Lane and Camrose Avenue, and are served by four bus routes; service no. 340, 79, 186, and 288.

## **Case history**

9 There is no recent strategic planning history at this site, and the applicant did not engage in pre-application discussions with the GLA on these proposals. However, the application forms part of a series of redevelopment proposals for the Centre coming forward through separate planning applications. Of particular relevance to this application is a proposal for a five storey car park, refused in July 2020, and approvals in February and July 2018 for a new South stand; new medical facilities, community facilities and commercial floorspace and increase in the total capacity of the stadium from 5,176 to 8,500 and a new indoor academy building with indoor and outdoor 3G pitches, a new indoor sports hall, and associated development.

## **Details of the proposal**

10 The application seeks outline planning permission for a mixed use development wrapping around and infilling the existing stadium stands and at basement level. The development comprises three elements and would provide the following:

- student accommodation and teaching facilities comprising 19 lecture theatres/auditoria and 44 dormitories.
- a medical diagnostics centre,
- a circa 150 room hotel with ancillary hospitality facilities

11 The proposed uses would be contained within the redeveloped stadium, with the proposed development contained within 52,700 sq.m of extended and infilled spaces around the ground and at basement level. Indicative plans show proposals which would alter the appearance of the stadium, current comprised of four separate stands, creating one unified structure and would increase the maximum height to an approximate height of 29.7m.

## **Strategic planning issues and relevant policies and guidance**

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Harrow Core Strategy (2012); Harrow Development Management Policies Local Plan (2013); Site Allocations Local Plan (2013); and the 2016 London Plan (Consolidated with Alterations since 2011).

13 The following are also relevant material considerations:

- The National Planning Policy Framework (2019)
- National Planning Practice Guidance
- The Mayor's Intend to Publish London Plan (December 2019)
- The Secretary of State's 13 March 2020 Directions issued under Section 337 of the Greater London Authority Act 1999 (as amended) to the extent that these are relevant to this particular application they have been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation.

- Harrow and Wealdston Area Action Plan 2013

14 The relevant issues and corresponding strategic policies and guidance are as follows:

- Principle of development *London Plan; Intend to Publish London Plan; Social Infrastructure SPG;*
- Visitor infrastructure *London Plan; Intend to Publish London Plan*
- Student Housing *London Plan; Intend to Publish London Plan*
- Open Space *London Plan; Intend to Publish London Plan*
- Urban design and heritage *London Plan; the Intend to Publish London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG;*
- Inclusive access *London Plan; the Intend to Publish London Plan: Accessible London: Achieving an Inclusive Environment SPG;*
- Education Facilities *London Plan; Intend to Publish London Plan*
- Sports Facilities *London Plan; Intend to Publish London Plan*
- Climate change *London Plan; the Intend to Publish London Plan; Sustainable Design and Construction SPG; London Environment Strategy;*
- Transport *London Plan; the Intend to Publish London Plan; the Mayor's Transport Strategy;*

## Principle of development

### Development on Open Space

15 The site lies wholly within land designated as Open Space. Intend to Publish London Plan Policy G4 states that a loss of open space will be resisted, whilst London Plan Policy 7.18 states that losses must be offset by an improvement in open space elsewhere.

16 Intend to Publish London Plan Policy S5 specifies that existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

17 The proposed development would be entirely located on the hardstanding and car parking space surrounding the existing stadium; as such, there is no loss of existing green open space as such, rather the open space lost could be considered previously developed land. The land concerned nevertheless contributes to a sense of openness at the site (given that it is not occupied by buildings) and similarly retains a degree of potential flexibility as to how it may support the function of the site. It is nevertheless noted that in response to consultation, Sport England did not raise objection to the loss of open space, specifying that the proposal meets their exception test in that: *'The proposed development affects only land incapable of forming part of a playing pitch and does not:*

- *reduce the size of any playing pitch*

- *result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);*
- *reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;*
- *result in the loss of other sporting provision or ancillary facilities on the site; or*
- *prejudice the use of any remaining areas of playing field on the site.'*

18 Notwithstanding Sport England's position, and noting that the site is in an area of identified open space deficiency, it must be recognised that the proposal would result in the loss of land designated as open space, albeit previously developed land, and this loss must be justified. The site is set within a large expanse of open space with playing fields surrounding the site to the north, east and south. The height scale and massing of the proposed works would reduce visual permeability across the previously developed parts of the open space. This would cause harm to the perception of openness across the open space which should be balanced against the benefits of the proposals.

19 In the first instance, the applicant must explore opportunities to provide additional open space to ensure there is no net loss of open space from the site. However, in line with Intend to Publish Policy S5, where additional open space cannot be provided, the applicant must explore opportunities to provide alternative and or enhanced sports or recreational provision with clear public benefits outweighing the loss of the existing land. A robust community use agreement should be key part of any such proposed public benefits package.

#### Visitor accommodation

20 London Plan Policy 2.15 and Policies SD6, SD7 and SD8 of the Intend to Publish London Plan adopt a town-centre first approach, which recognises that town centres should be the foci for commercial development beyond the Central Activities Zone. Out of centre sites should only be considered for town centre uses if it is demonstrated through a sequential test that no suitable sites are (or are expected to become) available within town centre or edge of centre locations.

21 London Plan Policy 4.5 and Intend to Publish London Plan policy E10 recognises the need for hotel rooms in London and support further provision to address this need. The policies also emphasise that, where located beyond the Central Activities Zone, visitor infrastructure should be located in town centres and Opportunity Areas with good public transport access.

22 The proposal seeks to provide a 150 room hotel which is envisaged to provide visitor accommodation for users of the sporting activities, proposed medical facility and hospitality facilities at the site. The hotel use is also envisaged to serve more general visitor and tourist demand in the wider area.

23 The application includes a sequential test which states that there are no sites within the London Borough of Harrow that can accommodate the proposals as they are intended to function. It is noted that Harrow Council has reviewed the sequential test and is not satisfied that the applicant's methodology is sufficiently rigorous to demonstrate that there are no other suitable sites available within town centre or edge of centre locations for the proposed hotel use. GLA officers agree that the submitted assessment requires more rigour, and, in particular, consideration of potential sites in the neighbouring boroughs of Barnet and Brent (given the proximity of the site to the borough boundaries). In the absence of any pre-application engagement with the GLA on this proposal, GLA officers would welcome further discussions with both the Council and the applicant on the rationale for the combination of



uses proposed, and the appropriate scope and nature of the sequential test in response to the out of centre location and the particular characteristics of this proposal, or any future variant of it. More generally, GLA offers need to understand any potential synergies between the uses proposed; any potential public benefits arising from this; and, therefore, the rationale for their proposed aggregation in this case.

24 Whilst in broad terms the beneficial relationship between football stadia and commercial activities is recognised, the proposal site is not in an Opportunity Area, is an out-of-centre location and is designated open space. The site is also allocated within the Harrow's Site Allocations Local Plan for community and outdoor sports use. There is limited information within the application demonstrating that the proposals would address the site allocation in terms of provision for community outdoor sports development. In light of the above, there is a strong policy presumption against the introduction of a hotel use at this site which the proposal has not currently overcome.

#### Education facilities and student accommodation

25 Intend to Publish London Plan Policy S3 supports the provision of new education facilities and the shared use of services between universities, sports providers and community facilities. Such facilities should however be located in accessible locations, with good public transport accessibility and access by walking and cycling.

26 The proposals include a consolidated higher education facility providing 19 lecture rooms and 44 onsite student accommodation rooms. The use would operate as a satellite campus for the University Campus of Football Business (UCFB).

27 The introduction of a specialist sports related educational facility may be compatible with the existing use of the site as a football and sports complex, as well as with the site's allocation for outdoor sports development. However, as noted above, the site is not in an accessible location and as such there are concerns around the sustainability of the introduction of the proposed use to the out of centre site. This is considered further in the transport section below.

28 Similarly, whilst Policy H15 supports to proposals to meet the strategic need for student accommodation in London, there is limited justification for the introduction of student accommodation in this out of centre location with limited public transport access.

29 The GLA recognises the potential benefits of expanding and formalising the presence of world class sports related teaching facilities at the site, and such proposals may be supported where sustainable in transport terms, and where the use would increase access to sporting facilities and maximise the extended or multiple use of educational facilities for community or recreational use. However, in the absence of reasoned justification, the introduction of on-site student accommodation in this location is not considered appropriate.

#### Medical facility

30 Intend to Publish London Plan Policy S3 supports development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care. As with the above uses, such facilities should be easily accessible by public transport, cycling and walking.

31 The proposal seeks to provide a new Cancer Screening Centre together with accommodation integrated into the proposed hotel for patients of the existing diagnostics centre on the site.

32 It is noted that a medical diagnostic centre is in operation at the site currently, and serves private patients as well as providing diagnostic capacity to the NHS. As such, the principle of this use on the site is established. As with the educational facility discussed above, whilst the benefits of expanding the existing medical diagnostic facilities on the site are recognised, the site is not in an accessible location and as such there are concerns on the sustainability of the proposals which should be addressed in an assessment of transport impact.

33 More generally, there is concern that the requirement for patient accommodation within the proposed hotel may simply be generated by the site's out of centre location, and the difficulty of accessing the site or finding suitable visitor accommodation nearby. This underlines concerns about the sustainability of the proposals, and the suitability of this site for the combination of uses proposed.

#### Conclusion – principle of development

34 The proposal would result in the loss of land designated as open space contrary to London Plan policies 7.18 and 3.19, and intend to publish London Plan policies G4 and S5. Where replacement provision cannot be made to offset this loss, the applicant must explore opportunities to provide alternative and or enhanced sporting or recreational provision as part of a proposal that cumulatively provides public benefits that could outweighing the loss.

35 The proposals seek to introduce a range of interrelated uses within the site as part of wider redevelopment proposals to create a sporting, educational, leisure and medical destination. In the absence of any pre-application engagement with the GLA on this proposal, GLA officers would welcome further discussions with both the Council and the applicant on the rationale for the combination of uses proposed, and the appropriate scope and nature of the sequential test in response to the out of centre location and the particular characteristics of this proposal, or any future variant of it. More generally, GLA offers need to understand any potential synergies between the uses proposed; any potential public benefits arising from this; and, therefore, the rationale for their proposed aggregation in this case. Whilst the established relationship between football stadia and commercial activities is generally recognised, the proposal site is not in an Opportunity Area, is an out-of-centre location, has relatively limited access to the public transport network and is designated open space that has not been allocated for the proposed uses within the local plan.

36 Notwithstanding the above, it is recognised that specialist sporting venues and stadiums have a role to play in providing facilities and enabling wider access to sport, as well as having an important community and cultural value. In this regard there are components of medical facility and education proposals that may be supported where they can be demonstrated to be sustainable. However, further discussions are required with Harrow Council and the applicant team before a scheme of this nature could qualify for support in strategic planning terms.

## Affordable student housing

37 Intend to Publish London Plan H15 seeks to ensure that the maximum level of accommodation is secured as affordable student accommodation, to follow the Fast Track Route, at least 35% of the accommodation must be secured.

38 The proposals do not include details of provision of affordable student accommodation. Notwithstanding the above assessment of the principle of student housing on the site. Should student housing come forward as part of the proposals, the applicant should seek to provide 35% affordable student accommodation in order to be eligible for consideration under the Fast Track route, as set out in Policy H5 of the Intend to Publish London Plan. Where a scheme fails to meet the 35% threshold, the applicant must provide a financial viability assessment demonstrating that the maximum viable amount of affordable student housing is being provided. The assessment should be treated transparently and undertaken in line with the detailed methodology in the Mayor's Affordable Housing and Viability SPG. Viability tested schemes will be subject to both early and late stage viability reviews to be secured via section 106 agreement.

39 In addition to the above, all accommodation must be secured through a nomination agreement for occupation of students from one or more academic provider. This agreement must be secured within the S106.

## Urban design

### Design, layout, public realm and landscaping

40 The application is submitted in outline with details of the layout, scale and appearance of the development to be determined by Harrow Council at reserved matters stage. Indicative plans indicate the development expanding the footprint of the existing stadium by approximately one third, occupying the existing hard standing around the stadium currently used as access roads and car parking.



Figure 2: indicative 3D aerial view

41 The new built form would encircle and infill the spaces between the existing stands, increasing the height to the north, south and east sides of the stadium to approximately 29.7m. The existing seated stands range in height from 13 to 17m and as such the proposed development represents a significant step change in height, massing and visual characteristics of the existing site, relative to the open playing fields and low-rise suburban context of the wider area, illustrated in the indicative visuals within the design and access statement.

42 The indicative external treatment of the stadium gives the site a more unified appearance, more representative of a modern sports facility and would be beneficial on that basis. Notwithstanding this the proposals would result in an impact on the perception of openness in this part of the site and this is something that must be outweighed by compensatory provision of open space and/or other public benefits.

### Fire safety

43 In line with Policy D12 of the Mayor's Intend to Publish London Plan, a fire statement has been prepared by a third party suitably qualified assessor and submitted as part of the planning application. This details how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety and suppression features and means of access for fire service personnel.

### Inclusive design

44 London Plan Policy 7.2 and Policy D5 of the Mayor's Intend to Publish London Plan seek to ensure that new development achieves the highest standards of accessible and inclusive design. Inclusive and step-free access throughout all proposed elements of the scheme and the surrounding public realm should be secured as part of any permission.

## **Climate Change**

45 London Plan Policy 5.2 and Intend to Publish London Plan Policy SI2 make clear that major development proposals should submit an energy strategy to demonstrate how the carbon reduction targets will be met within the framework of the energy hierarchy. The applicant has not provided an energy statement for the outline application and this is unacceptable. The application should be supported by an outline energy strategy and commitment to addressing all required energy policies as required by the above mentioned policies and their associated energy assessment guidance available here:

[www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0](http://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0).

## **Transport**

46 London Plan Policy 6.3 and Intend to Publish London Plan Policy T4 make clear that Transport Assessments will be required in accordance with TfL's Transport Assessment Best Practice Guidance for major planning applications. Whilst the planning statement indicates a Transport Assessment (TA) has been prepared to support this application, this has not been submitted with the current application. This is unacceptable. Given the above concerns with regard to the transport impact of the proposals, the applicant is advised to provide a Transport Assessment directly related to these proposals. For the GLA and Transport for London to understand the transport policy implications of the development, the following information is required:

- Base and future person trip generation from the site
- Mode of travel and how this will change;
- Details of cycle parking and compliance with London Cycle Design Standards;
- Deliveries and servicing proposals;
- Active Travel Zone assessment;
- Vision Zero assessment;
- Future public transport demand;
- Construction Logistics Plan

47 Given the concerns regarding sustainability of the range of uses, in the proposed location, it is pertinent to understand the potential transport impacts and transport policy implications. Insufficient information has been provided in this regard which is of concern and should be addressed in full prior to any positive decision on this scheme.

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

48 Harrow Council planning officers have reviewed the scheme and recommended refusal to Planning Committee on 2 September 2020. Harrow Planning Committee resolved against the officer recommendation and are minded to approve the application. A final decision has been deferred to a later date pending the receipt of consultation comments from the Mayor of London.

### **Legal considerations**

49 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

### **Financial considerations**

50 There are no financial considerations at this stage.

### **Conclusion**

51 The London Plan and the Mayor's Intend to Publish London Plan policies on public open space, health care facilities, education facilities, sports and recreation facilities, visitor infrastructure, student housing, urban design, inclusive design, climate change, energy, and transport are relevant to this application. The proposals do not comply with the London Plan and the Mayor's Intend to Publish London Plan, as set out below:

- **Principle of development:** The proposal would result in the loss of land designated as open space, the applicant must explore opportunities to provide alternative and or enhanced sports or recreational provision with clear public benefits outweighing this loss. The proposal seeks to introduce a range use that are inappropriate for an out-of-centre location. GLA officers require further discussions with both the Council

and the applicant on the rationale for the combination of uses proposed, and the appropriate scope and nature of the sequential site selection test. Whilst elements of the healthcare and educational components of the proposal may be supported where these can be demonstrated to be sustainable, there is a strong policy presumption against the hotel and student housing components.

- **Affordable student housing:** The proposals do not include details of provision of affordable student accommodation. In the event the student housing proposals are progressed, the applicant should seek to meet the 35% threshold level of affordable student accommodation to be eligible for consideration under the Fast Track route. Should the scheme fail to meet the 35% Fast Track threshold, it must follow the Viability Tested Route, and a financial viability assessment must be provided, and early and late stage viability reviews secured.
- **Urban design and heritage:** Notwithstanding the impact of the proposals on designated open space, the proposals do not raise strategic concern in terms of overall scale massing and design.
- **Environment and climate change:** Further information is required in relation to energy, flood risk and drainage
- **Transport:** Insufficient information has been provided in respect of the transport impacts of the proposals. The applicant must provide a transport assessment to enable detailed assessment of the impacts and transport policy implications.

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for further information, contact GLA Planning Unit (Development Management Team):

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