

Land at Ryelands Primary School

in the London Borough of Croydon

planning application no. 14/04849/P

Strategic planning application stage II 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

Formation of a new secondary school to include part retention of existing school buildings and erection of a part two/part three storey building with roof level plant; provision of multi-use games area with 4.5m fencing and 10m high floodlights, alteration to land levels to create a flat playing surface and provision of fencing, car parking and new access to the school. Erection of a single storey entrance/turnstile building with reception area office and stores for Arena, demolition of Croydon Harriers building with replacement modular building by the Arena grandstand, relocation of storage containers, provision of parking for the area and public realm improvements.

The applicant

The applicant is **LBC Capital Delivery Hub**, and the architect is **Curl la Tourelle Architects**.

Strategic issues

The key strategic issues in this case are the loss of **Metropolitan Open Land**, **urban design**, **inclusive design** and **sustainable development**.

The Council's decision

In this instance Croydon Council has resolved to grant permission.

Recommendation

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

Context

1 On 20 November 2015 the Mayor of London received documents from Croydon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under Category 3D of the Schedule to the Order 2008:

3D: “(a) Development on land allocated as Green Belt or Metropolitan Open Land in the development plan in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and

(b) which would involve the construction of a building with a floorspace of more than 1,000 sq.m or a material change in the use of such a building.”

2 On 13 January 2015 the Mayor considered planning report D&P/3552/01 and subsequently advised Croydon Council that while the scheme was generally acceptable in strategic planning terms, the application failed to comply with the London Plan, for the reasons set out in paragraph 46 of the above-mentioned report, but that the possible remedies set out in that paragraph could address the deficiencies.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised in response to the Mayor’s concerns (see below). On 26 February, Croydon Council decided that it was minded to grant planning permission and on 13 April 2015 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged or direct Council under Article 6 to refuse the application. The Mayor has until 27 April 2015 to notify the Council of his decision and to issue any direction.

4 The decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk.

Update

5 At the consultation stage Croydon Council was advised that the application was generally acceptable in strategic terms, but failed to comply with the London Plan, for the reasons set out in paragraph 46 of the above-mentioned report, but that the remedies set out in that paragraph could address these deficiencies, summarised as follows:

- **Urban design:** While the scheme design raised no strategic issues, GLA officers questioned the use of white render in relation to the life span of the material.
- **Sustainable development:** The carbon savings should be recalculated based on Part L 2013 methodology. A BRUKL sheet for energy efficiency measures along should be submitted along with details of how overheating will be minimised. The provision for future connection to a district heating network should be provided and plans for the location and size of the energy centre should also be provided.
- **Transportation:** Further details of the electric charging points should be provided and secured along with a car parking management plan, construction logistics plan and delivery and servicing management plan. An updated school travel plan is required and a financial contribution of £100,000 towards improvements to the shelter at Croydon Arena Tram Stop.

6 Since the initial consultation, further details on the scheme have been provided to the Council which addresses the points raised above. Taking each of the outstanding points in turn, the following is noted:

Urban design

7 The overall design of the scheme is well considered. Officers raised concerns with the use of white render as a material and its robustness given the need to keep school maintenance budgets to a minimum. The building would comprise brick at ground floor and render at the upper floors which Croydon education department are satisfied will be sufficiently robust. A condition on the draft decision notice requires the submission of samples of the materials which would allow the Council to ensure their quality.

Sustainable development

8 At consultation stage, a number of questions were raised in relation to the submitted energy strategy. The key outstanding issue was that the submission had calculated the carbon savings based on the historic London Plan target of 40% against Part L 2010 building regulations. London Plan Policy 5.2 requires planning applications submitted after 5 July 2014 to make a 35% carbon savings based on Part L 2013 target. While a 40% reduction against 2010 is broadly equivalent to the 2013 target, it is unfortunate that the energy strategy has not been updated to take account of the latest policy. However, given the pressing need for school places, and that the development of the scheme and discussions with the Council took place while the previous target was in place, in this case, the calculation method is acceptable.

9 When assessed against the 2010 target, the scheme does not meet the required 40% carbon saving. Therefore, the Council have secured a payment of £8,625.00 in a unilateral undertaking from the applicant to go towards carbon saving measures in the locality of the site. In this case, the mitigation secured is acceptable.

10 The stage 1 response raised the issue of overheating and how this would be minimised in the school building. No overheating assessment has been submitted to GLA officers for the proposed building; however, Croydon officers have confirmed that thermal modelling will be carried out in line with relevant building control requirements for school buildings to prevent overheating. While it is unfortunate that the full thermal modelling incorporating the latest TM49 and TM52 data has not been completed, given that an element of thermal modelling has been carried out, no further objection is raised.

Transportation

11 A number of highways related issues were raised at stage 1. Matters relating to wheelchair parking levels, car parking management plan, school Travel Plan and construction logistics plan are proposed to be adequately secured by condition which is welcomed. Officers have received a plan which outlines the car parking spaces which are to be equipped with electric charging points and Croydon officers have confirmed that the management of these would be controlled through the car parking management plan.

12 TfL is disappointed that the Council have resolved to not provide mitigation for the increased impact upon the use of the Croydon Arena Tram Stop; however, on balance the application is now acceptable in transport terms and is in accordance with the London Plan transport policies.

Response to consultation

Local neighbourhood consultation

13 The application was advertised by site and press notices. 36 responses were received, 34 objecting to the scheme, one supporting the scheme and one response which raised comments in relation to the application criteria for the proposed school. In addition, one petition was received which had 33 signatures.

14 The objections to the scheme are summarised as follows:

- The scheme is an overdevelopment of the site.
- The scheme is out of character with the area and the South Norwood County Park.
- The design of the building would represent a blot on the landscape.
- There would be a harmful effect on the Metropolitan Open Land and the South Norwood County Park. The development is inappropriate use of Metropolitan Open Land.
- There would be a harmful effect on wildlife.
- The development would result in increased traffic and parking stress on local roads.
- The proposal removes vital overnight parking facilities.
- There is a cumulative effect of different uses.
- The development raises highway safety issues and safety within the car park.
- Issues of safety on the tram stop.
- The development raises issues of construction safety.
- The scheme raises issues of security.
- The development would result in loss of privacy to surrounding properties.
- The development would result in loss of light to surrounding properties.
- The development would result in loss of trees.
- The proposal would lead to increased noise, litter and light pollution.
- The MUGA would have a harmful impact on the openness of the MOL.
- There is no justification for the need to locate the school on this site – there are other sites in the area that are available.
- The proposal will have a negative impact on existing sports facilities.
- The previous application for extending the primary school was refused and previous development at the Arena was shelved.
- The application documents are misleading.
- The transport assessment is contradictory.
- The proposal is contrary to UDP policy.
- There is insufficient parking within the proposed school site.

15 The representation of support is summarised as follows:

- Support a new secondary school in the area subject to sufficient infrastructure and the parking issues are resolved.

Statutory consultation

16 A number of statutory consultees were consulted as part of the application, and commented as follows:

- **Sport England:** No objection to the scheme. The site is unsuitable of being used to mark out pitches and the facilities provide positive and integrated opportunities for sports recreation.
- **Environment Agency:** No objection to the scheme. Conditions are recommended to manage contaminated land, drainage and surface water issues.
- **Natural England:** No objection to the proposed development.
- **Thames Water:** No objection to the scheme but an informative was suggested.

17 The statutory and non-statutory responses to the Council's consultation do not raise any material planning issues of strategic importance that have not already been considered at consultation stage and/or in this report.

Legal considerations

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

Financial considerations

19 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government Planning Practice Guidance emphasises that parties usually pay their own expenses arising from an appeal.

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

Conclusion

21 Having regard to the details of the application, the matters set out in Croydon Council's committee report, consultation responses, the draft conditions and draft S106 agreement, the scheme is acceptable in strategic planning terms.

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Land at Ryelands Primary School

in the London Borough of Croydon

planning application no. 14/04849/P

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

Formation of new secondary school to include part retention of existing school buildings and erection of two/three storey buildings with roof level plant; provision of Multi Use Games Area with 4.5 metre high fencing and 10 metre high floodlights; alterations to land levels to create flat playing surface and provision of fencing, car parking and new accesses for the new school. Erection of single storey entrance/turnstile building with reception area office and stores for Arena; demolition of Croydon Harriers building with replacement modular building by the Arena grandstand ; relocation of storage containers; provision of parking for the arena together with Public Realm improvements.

The applicant

The applicant is **LBC Capital Delivery Hub**, and the architect is **Curl la Tourelle Architects**.

Strategic issues

The key strategic issues in this case are **land uses, Metropolitan Open Land, urban design, inclusive design** and **sustainable development**.

Recommendation

That Croydon be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 48 of this report, but that the possible remedies set out in that paragraph could address the deficiencies. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

Context

1 On 20 November 2014 the Mayor of London received documents from Croydon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 16 January 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan,

and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3D of the Schedule to the Order 2008:

3D: "(a) Development on land allocated as Green Belt of Metropolitan Open Land in the development plan in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and

(b) which would involve the construction of a building with a floorspace of more than 1,000 sq.m or a material change in the use of such a building."

3 Once Croydon Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal or allow the Council to determine it itself, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

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

Site description

5 The site measures 2.53ha and is located to the east of Albert Road and adjacent to the South Norwood Country Park. The site currently comprises a primary school which is relocating to the Croydon Adult Learning and Training centre close to the site on Oakley Road. The school sits outside land designated as Metropolitan Open Land (MOL).

6 The Croydon Arena athletics stadium adjoins the site to the east, with a spectators stand within MOL. The area entrance/turnstile, car park and access road to the south east of the school site are part of the application boundary and within MOL. To the north of the site is the South Norwood Country Park which as well as being in MOL is also a Site of Nature Conservation Importance and a Local Nature Reserve.

7 The site lies immediately adjacent to the Croydon Arena tram stop and five bus routes to regional destinations. The site has a PTAL level of between 3 and 4 (on a scale of 1-6b where 6b is the highest) which represents a moderate level of accessibility.

Details of the proposal

8 The application seeks partial demolition and partial retention of the existing building to house a new secondary school. A modern extension to the school on the northern boundary would be retained with a new three storey L shaped extension teaching block to the centre of the site. The school would be an academy and would cater for 915 pupils aged between 11-16, and 15 children in a specialist Autism Spectrum & Communications Disorder unit.

9 Main school access would be obtained from Albert Road with visitor access in the central core. The servicing area would be located to the north of the school. A new car parking area is proposed to the south of the site. A new multi-use games area (MUGA) and car park is proposed to the east of the main school, within the MOL. The application also proposes to replace the existing entrance building to the Arena comprising a single storey building with office accommodation, reception, turnstiles, office space, kitchen and PA room. In addition, the Croydon Harriers have a small element of accommodation on the site which is proposed to be relocated to the 2010 pre-fabricated studios already occupied by the school.

Case history

10 No pre-application submission was made in respect of this case.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Mix of uses *London Plan;*
- MOL *London Plan ;*
- Urban design *London Plan;*
- Access *London Plan; Accessible London SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy;*
- Transport *London Plan; the Mayor's Transport Strategy.*

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 2013 Croydon Local Plan: strategic policies, 'saved' Policies of the Croydon Unitary Development Plan and 2011 London Plan (as amended).

13 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework
- Draft Croydon Local Plan: detailed policies and proposals
- The Further Alterations to the London Plan (intention to publish version 2014)

Land use

14 London Plan Policy 3.8 supports the provision of secondary school facilities adequate to meet the demands of a growing and changing population. It also states the support for new schools. The applicant has identified that across Croydon there is an anticipated need of 12.5 forms of entry for secondary places each year. The borough should confirm that this proposal would assist in meeting this identified need. The commitment to ensure that the school facilities will be open to the community outside school hours is strongly welcomed. This should be secured in a legal agreement to ensure this in perpetuity.

15 London Plan Policy 7.17 states that the Mayor supports the extent of Metropolitan Open Land (MOL) land and its protection from development having an adverse impact on the openness of it. It also highlights that the NPPF guidance on Green Belts also applies to MOL. The NPPF states that inappropriate development is harmful to the Green Belt (of in this case MOL) and should not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the MOL by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. However, the NPPF does list exceptions where buildings are not inappropriate in the MOL which includes the provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the MOL and does not conflict with the purposes of including land within it.

16 The new school would be located outside the MOL, and therefore does not raise any issues in relation to Policy 7.17. However, the multi-use games area (MUGA), the new car park and the re-built Arena entrance building would be located on MOL land. In relation to the MUGA, this would provide facilities that would allow for outdoor recreation and given their see-through mesh fence would preserve the openness of the MOL. It would also support the function of the school in line with Policy 3.8. The MUGA would therefore comprise acceptable development on MOL land.

17 The relocation of the Arena entrance building would replace a building outside MOL with a building inside the MOL. While the location of this building would be better placed outside the MOL boundary, the proposal includes the demolition of a number of other buildings within the MOL and would not represent a significant increase in built form in the MOL. In addition the proposed building is small in scale and it would facilitate the use of the Arena for outdoor recreation. Therefore, on balance, the building would not be inappropriate development within the MOL.

18 It is unfortunate that the new parking area is proposed within MOL land; however, it is acknowledged that this would be extending an area of hardstanding that currently exists, and that the car park would be used to support the outdoor recreation use of the Arena. In addition, this car park would replace an existing car park and would not represent a strategic objection and the proposal would comply with Policy 7.17.

Urban design

19 The layout of the school is well considered, with the main building and entrances fronting Albert Road. The school proposes a second community entrance to the south of the site which would be used out of hours and leads directly to the sports hall and music area which can be secured from the rest of the school.

20 The outside space proposed would be located behind the school and comprises a number of different areas including a garden, an informal social area, a hard court, and the multi-use games area located to the south of the site. This would provide a range of opportunities for students and is welcomed.

21 The new multi-use games area, while away from the school building would be close by and accessible to the public, this is welcome and given their location in the MOL, understandable. The new Arena entrance building is also sensibly located in line with the tram stop which would give it legibility and additional prominence.

22 The new school building would be predominately three stories in height which would allow for the required school space, but also relate well to the retained two storey extension to the north of the site and the predominately two storey residential buildings that surround the site. The building would not appear overly large when viewed from the surrounding MOL.

23 It is proposed that the school would be completed in brickwork, render and cladding panels. Given the expanse of render proposed, the borough should ensure that this is sufficiently robust to maintain a quality appearance over a long period of time. This is particularly important given the long life of the school building and the need to keep maintenance costs to a minimum. GLA officers would welcome an increase in the use of brick in this scheme.

Inclusive design

24 The new academy building has been designed to be accessible to all with clear horizontal circulation routes and lifts. Each toilet block has a disabled toilet as well as two large cubicles for ambulant disabled people. The out of hours arrangements ensure that the building can be secured while providing community access to a particular zone through separate entrances. This would be in accordance with Policy 7.2.

Sustainable development

25 The application was submitted after 5 July 2014, so the carbon savings should be calculated based on Part L 2013 methodology, as described in the GLA Guidance on preparing energy assessments (http://www.london.gov.uk/sites/default/files/GLA%20guidance%20on%20preparing%20energy%20assessments%20April%202014%20final_2.pdf). The applicant should resubmit the figures in line with this current guidance. Information should also be provided on the extent of refurbishment works to the existing building and (if applicable) what energy efficiency improvements have been introduced to this part of the development.

26 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting and controls, variable speed drives and mechanical ventilation with heat recovery. Evidence should be provided on how the demand for cooling and the risk of overheating will be minimised in line with Policy 5.9, for example with the use of dynamic thermal modelling or ClassCool.

27 The applicant should reassess the building using Part L 2013 and should commit to meeting Part L 2013 by efficiency measures alone. A BRUKL sheet for the efficiency only case should be submitted to support any savings claimed for this tier of the energy hierarchy.

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

29 The applicant should commit to providing a site heat network served by a single energy centre. A drawing showing the route of the heat network linking all buildings on the site and the location and size of the plant room should be provided.

30 The applicant has investigated the feasibility of CHP, but due to the intermittent nature of the heat load, CHP is not proposed. This is accepted in this case. The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 900 sq.m of solar PV on the roof, which is accompanied by a plan, this is acceptable.

31 When taken together, the carbon reductions achieved in this case fall short of the targets in London Plan Policy 5.2, and the applicant has agreed a cash in lieu payment to mitigate this. The carbon savings should be reassessed using the Part L 2013 methodology and address the comments above before compliance with policy can be verified.

Transportation

32 There are currently 18 car spaces on the primary school and 152 (including 4 marked wheelchair accessible) in the Arena site. The scheme proposes two wheelchair accessible spaces to serve the new secondary school and 94 spaces for the re-landscaped Arena car park, of which 15 would be wheelchair accessible. No formal coach or mini-bus parking is proposed. TfL raise no objection to the quantum of car parking and welcome the increase in designated wheelchair accessible spaces. A draft car parking management plan has been submitted which should be developed and secured by condition or through the S106 agreement; this should address how the Arena car park will be managed to ensure that sufficient wheelchair spaces are available for the blue badge holders amongst the 120 estimated school staff as the two on site spaces are likely to be inadequate for the needs of the school. The parking areas should incorporate 10% active and 10% passive provision for electric vehicle charging points as required by the London Plan. These should also be secured by condition.

33 The proposal includes 56 cycle parking spaces for use by pupils and staff of the school with an area marked to provide a further 72 spaces if required. These 128 cycle spaces should be provided prior to full occupation of the school in order to accord with London Plan Policy 6.9 and this should be secured by condition.

34 Trip generation estimates have been carried out using Census and survey data following detailed scoping discussions with Croydon and TfL at the pre-application stage and the methodology is acceptable.

35 The development would lead to a significant proportional increase in trips undertaken using the public transport network, particularly bus and tram modes. The applicant has interrogated capacity and usage data from TfL and concluded that the development would not lead to demand exceeding the capacity of any given service. The conclusions reached are accepted by TfL, though it is noted that the Croydon Arena Tram stop currently has inadequate shelters and lighting. The significant increase in users that would occur as a result of this development would further exceed the capacity of the stop to safely and conveniently accommodate that demand. In order to mitigate this impact and assist in encouraging more sustainable means of travel, a financial contribution, estimated at £100,000 towards the improvement of the security, lighting and other shelter facilities is required. This should be secured through the S106 agreement payable to TfL.

36 The review of the impact of vehicular traffic generated by the proposed development is ongoing and TfL will provide separate written feedback on this matter. Any necessary mitigation would also need to be secured.

37 In line with London Plan Policy 6.10, the application proposes improvement to the public realm throughout the site, as well as proposing a contribution to allow Croydon to improve road safety for, and encourage travel to and from the site, by pedestrians. The improvements to the Tram stop outlined above would also contribute towards this goal as the route from the site across the Tram stop comprises the primary pedestrian link across the line towards Long Lane.

38 In line with London Plan Policy 6.3, detailed delivery and servicing and construction logistics plans, which are in accordance with TfL guidance should be secured through the S106 agreement or condition. The detailed construction logistics plan should be submitted to and agreed prior to the commencement of the development and the delivery and servicing plan prior to occupation.

39 A Framework School Travel Plan has been submitted with the application, which has been prepared in accordance with TfL's STAR Track system. This should form the basis of the detailed Travel Plan to be secured, enforced, funded and monitored as part of the S106 agreement.

Community Infrastructure Levy

40 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1 April 2012, and it will be paid on commencement of most new development in Greater London granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail. Developments for schools and colleges under the Education Acts are nil rated.

41 The Mayor has arranged boroughs into three charging bands. The rate for Croydon is £20 sq.m. The required CIL should be confirmed by the applicant and council once the components of the development or phase thereof have themselves been finalised. See the 2010 regulations: <http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents> as amended by the 2011 regulations: <http://www.legislation.gov.uk/ukdsi/2011/987/made>

42 London borough councils are also able to introduce CIL charges which are payable **in addition** to the Mayor's CIL. Croydon has adopted a charging scheme and the payment due should be confirmed with the borough.

Local planning authority's position

43 The LPA's position is not known at this time.

Legal considerations

44 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

45 There are no financial considerations at this stage.

Conclusion

46 London Plan policies on land use principles, urban design, inclusive access, sustainable development and transport are relevant to this application. In general, the application complies with these policies, however, further discussion is needed on the following points prior to referring the application back to the Mayor:

- **Urban design:** While the overall urban design raises no strategic issues, the detailed materials should be reviewed.

- **Sustainable development:** The application was submitted after 5 July 2014, so the carbon savings should be re-calculated based on Part L 2013 methodology. A BRUKL sheet for the efficiency only case should be submitted to support any savings claimed for this tier of the energy hierarchy and evidence should be provided on how the demand for cooling and the risk of overheating will be minimised. The applicant should provide a commitment to allow future connection to a district heating network should one become available. An on-site heat network should be installed. Plans of the network and location of the central energy centre should be provided.
- **Transportation:** Further details of the electric vehicle charging points should be provided and should be secured in the S106 or by condition along with a car parking management plan, construction logistics plan and delivery and servicing management plan. An updated school travel plan should also be secured through the S106. A financial contribution (estimated at £100,000) towards improvements to securing, lighting and other shelter facilities at Croydon Arena should be agreed through the S106.

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