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Our Ref: PR\_02\_2015

04 August 2015

Dear Sir / Madam,

### **Nishkam School West London Sequential Test**

I write in relation to the recent application submitted for the Nishkam School West London and specifically to address some concerns regarding the sequential test undertaken and submitted with the planning application for the Nishkam School West London.

#### **Process**

Described below is the process that was undertaken in the assessment of sites.

- **All sites** – 200 sites were mapped and examined within the catchment area (a 3 mile radius of Hounslow Central). A number of sites were rejected as they were found to be too small

The Council suggested that the site search be carried out for all sites that are within the minimum size required for the nursery or Post 16 requirements (the smallest elements).

As confirmed with LB Hounslow, the minimum site size to be used for the site search is therefore 0.98ha. Sites had to be a minimum of 2.2 hectares to be considered (or adjoin sites capable of forming a single site of 2.2 ha).

- **Showstoppers** – A number of sites were initially rejected (as per agreed methodology) because they were subject to show stopper constraints, including Green Belt and MOL designation. The show stoppers consisted of the following designations;
  - Green Belt and Metropolitan Open Land
  - Ancient Woodland
  - Scheduled Ancient Monuments
  - European Sites for Nature Conservation Importance
  - Historic Parks and Gardens
  - Areas identified as Strategic FRA Flood Zone 3
  - Areas of Designated Open Space

A total of 76 show-stopper sites were rejected at this stage. These would only be revisited if no sequentially preferable site could be found.

- **Preferred non-showstopper sites** – These were the preferred sites we looked at in detail in terms of availability / deliverability and suitability (i.e. they were not constrained by show-stopper constraints).

These sites were therefore proposed to be taken forward for further more detailed consideration.

DTZ were already engaged by the EfA to advise on property matters in connection with the Government's Free Schools Programme. Their remit extended to acquisition of new sites and buildings, advice around suitability of sites, valuation and planning and other ad hoc property related advice.

They undertook an appraisal of the availability / deliverability of these sites (see DTZ report dated 31.03.2014).

None of the sites which were identified as requiring further investigation are suitable for the Nishkam School. Five were unsuitable for purely financial reasons, a further eight due to deliverability, with either schemes being developed out or clear intentions to develop sites in accordance with extant planning consents. The remaining sites were unsuitable due primarily to unavailability but also, a combination of the other two key factors.

- **Previously Rejected Sites** (Sequentially Preferable Sites (Stage 2)) – These were sites re-examined that were only constrained by;
  - a. Flood Zones and Historic Parks and Gardens
  - b. Open Spaces

They were considered therefore to be sequentially preferable to MOL / MGB sites as it was possible that these constraints could be overcome through design / more detailed understanding of the particular constraint. There were only 17 sites in this category

None of these sites were found to be available, and it was concluded that, through this sequential testing exercise, there are no suitable, available or deliverable sites that are not designated as MOL or Metropolitan Green Belt.

- **MOL/MGB Sites** – We initially rejected those MOL / MGB sites which were clearly undeliverable or subject to a strategic site allocation and others where they were subject to other show-stopper constraints thereby prioritising other MOL/MGB sites.

The MOL/ MGB sites were split into 2 categories; Category A (previously developed sites) and Category B (other sites).

Previously developed sites were considered preferable and could potentially comply with Policy contained within para 89 of the NPPF, which states that although the construction of new buildings in the green belt are inappropriate, exceptions to this are;

*limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development*

There were 28 sites in total reviewed at this stage. The application site was considered to fall within Category B of these MOL/MGB sites.

The preferred site was arrived at after assessment of availability and deliverability of these 28 sites.

Contrary to the objection letter, no site was rejected on the basis of the PTAL rating.

### **3 sites identified by objectors as being potentially suitable, available and deliverable.**

The objections refer to three sites as being potentially available and suitable for the Nishkam School West London, contrary to the conclusions reached within the Sequential Test report.

#### **Feltham Arenas**

This site (site no. 27) was identified as being within the required search area and size criteria. It was initially rejected at the first stage as a show stopper site, being a designated public open space and therefore sequentially less preferable.

After the rejected of sequentially preferable sites it was reconsidered prior to consideration of any MOL / MGB sites.

Our letter to Hounslow Council (25 February 2014) identified the site as being within the ownership of Hounslow Council and that we would need confirmation of availability to consider this further. No reply has been received on this matter from Hounslow Council, confirming site availability.

The site has been subject to significant problems over recent years, with the dumping of soil and materials. This has recently been the subject of review by the Councils Scrutiny and Finish Group. We note that remedial works were recently completed at the site and the council has started to examine the kind of facilities people want in the area, with options including:

- an outdoor gym station
- a 'trim trail' linking the town to the park
- redevelopment of the running track for sport and physical activity
- conversion of the table-top into a nature zone or community growing area, and

- landscaping parts to encourage play, physical activity and improve health and wellbeing

The London Borough of Hounslow's Corporate Plan 2014-2019 contains a commitment to develop a Masterplan for Feltham town centre and the Council have now commissioned the production of the Feltham Vision and Concept Masterplan (of which the Feltham Arenas site forms a part).

The Feltham Vision and Concept Masterplan will contain a detailed analysis of Feltham's challenges and opportunities, which will then inform a strategy for Feltham's future that the Council will then seek to deliver.

The Vision and Concept Masterplan will ultimately form the key part of the evidence base of a West of the Borough Plan that the Council is bringing forward next year to sit alongside the new Local Plan. This will be a Development Plan Document (DPD) and will be subject to a formal consultation process during 2015-16 in order that the community of Feltham are given opportunities to engage with the Feltham Vision and Concept Masterplan as it is developed.

As stated by objectors, the site does appear on the Councils Invest Hounslow web site. However this does not provide an indication of availability for the school.

### **Gillette Building**

The Gillette building (site no.2) was identified at an early stage as a sequentially preferable site.

We made contact with the agent for the Gillette Corner Holdings SPV. The site was acquired for in excess of £23million which would have been outside the limits of cost to be suitable for the school.

The agents confirmed that they were currently taking stock of the site conditions and property as a whole and did not intend bringing anything forward at this time. It was likely to be some 9-12 months before they completed this initial review process and would be in a position to talk with other parties

Given the time between completing this initial sequential test and the planning application submission and on the basis of the earlier response received from the agent, we re-examined the site availability in May 2015. DTZ as agents acting on behalf of the EFA liaised with the agent dealing with the site and it was confirmed that the owner has still not firmed up his proposals and unwilling to pursue school use at this time.

As the objections point out, the site is identified on the Councils Invest Hounslow Web site, but although this site does identify potential sites allocated for development it does not provide any assessment of site ownership or availability / sale. The site remains unavailable.

### Sutton Lane

The Sutton Lane site (no.57) was identified as part of the initial site search and was considered to be a sequentially preferable site, being unconstrained by any "show stopper" constraints.

We requested confirmation from LB Hounslow that the site was potentially available as part of the sequential test process.

We received confirmation from Hounslow Council stating that this site was not available and it was not therefore considered in any greater detail.

It is allocated as education use in the Proposed Modifications to the Local Plan.

The site is reserved for education use as part of the planned expansion of the Wellington Junior School. A planning application (Reference: 01095/D/P2) for extensions and alterations to school buildings to change the existing two-form entry of primary school into a four-form entry nursery and infant school was approved on 28/05/2015 and related to the existing Wellington School on Sutton lane.

The design and access accompanying the application stated that;

*Construction of the new Wellington Junior School on the Church Meadows site adjacent is subject of a separate planning application that runs concurrent with this application*

Planning application reference 00083/L/P18 was submitted for *the erection of a part single part two storey building to form new junior school with a single storey sports pavillion and associated landscaping, access road and parking.*

The application is to enable the Wellington School to be increased to a 4 Form of Entry primary, forming a new building on the Church Meadows Site, (Sutton Lane Playing Fields).

A decision has yet to be made on this application, however it is anticipated that it will be reported to the August 2015 Planning Committee.

Although the site appears on the "invest in Hounslow" web site, this does not provide an assessment of ownership or availability / sale. The plans for expansion of the Wellington school onto the site are well advanced and as previously reported in the original sequential test in July 2014 it is unavailable for the Nishkam School.

We trust that this clarifies a number of matters in regard to the sequential test undertaken and submitted in support of the planning application.

Yours Faithfully



Chris Bean BA (Hons) MRTPI MAUD