

Further Statement

Our ref 06620/12/NT/JL

Date 8 September 2017

Issue 7 Does the Plan address adequately transport issues and the provision of necessary infrastructure to support the delivery of the strategic objectives and the vision? Are the Plan's monitoring targets justified adequately and of a level of detail that is appropriate to a Local Plan? How will the effectiveness of the Plan be managed?

1.0 Introduction

1.1 This Further Statement has been prepared by Lichfields on behalf of St Pauls School (SPS or 'the School') to respond to the questions raised by the Inspector in relation to Issue 7 in so far as they are pertinent to the School's objection. This Statement responds to question 7.

2.0 Response to question 7

Do the changes to the Policies Map reflect the Plan adequately? Are the changes proposed to the Policies Map sufficiently clear and comprehensive?

2.1 The changes to the Policies Map are not sufficiently clear and comprehensive in relation to the extent of the MOL boundary, specifically at St Paul's School.

2.2 The Council has noted (response to comment ID 87) that it does not consider that a Borough-wide review of Green Belt/ MOL boundaries is justified by the need for housing. We consider that this position ought not to have precluded a more targeted review of specific sites where there is an accepted need (for example the expansion/ alteration of schools on existing sites) and in the case of SPS where anomalies in the boundary have been accepted/ acknowledged by GLA officers and exceptional circumstances can be made. This is also consistent with the Council's clear aspiration to see exceptional education facilities in the Borough (Strategic Vision p14 of the Local Plan).

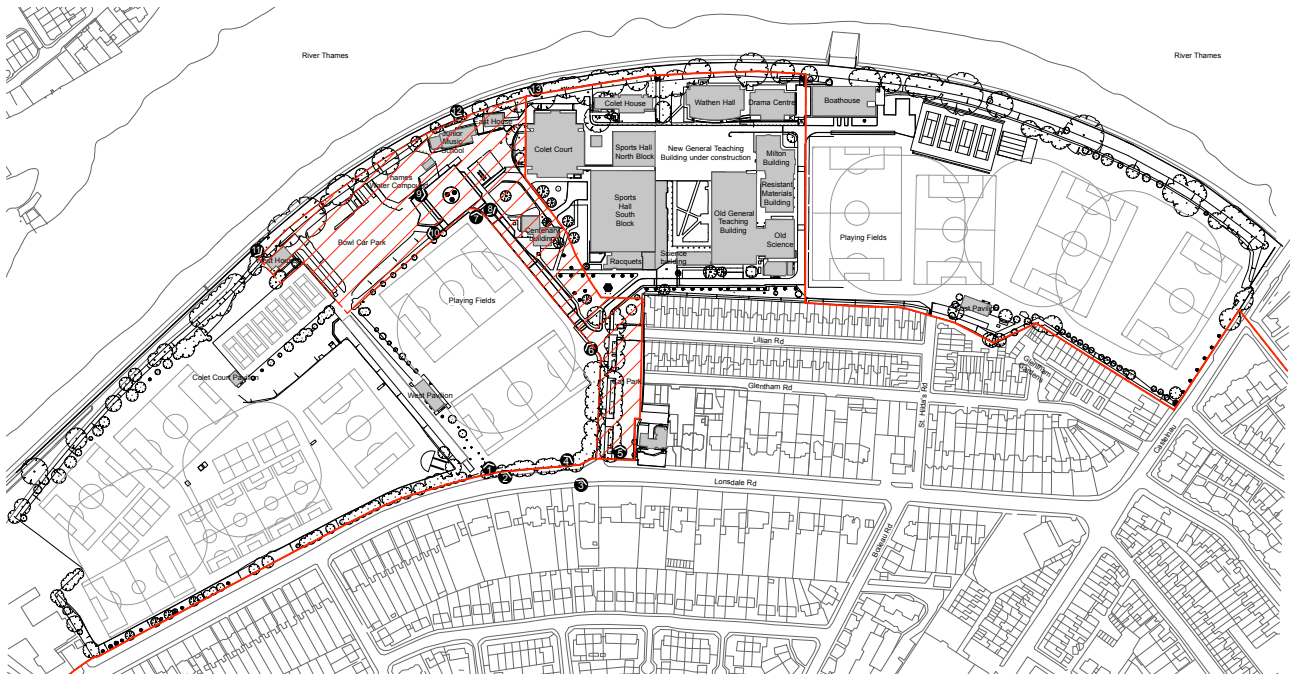
2.3 The Council has also commented in its response that the grant of planning permission is not a trigger for a need to review the MOL boundary and the MOL boundary should only be altered in exceptional circumstances. We agree that the grant of planning permission should not automatically trigger a change to the MOL boundary. However, we consider that in this case there are exceptional circumstances relating specifically to SPS. A combination of both exceptional circumstances and a Local Plan Review is an appropriate trigger for a targeted review of the MOL boundary at the School. It sets a clear and understandable position for the future, achieving the clarity which is expected to be found in Local Plans/Development Plans.

2.4 To address this, the Policies Map should be amended to exclude developed land on the west side of SPS as shown on the attached plan in Appendix 1.

Is the Policies Map informed by the evidence adequately?

- 2.5 The evidence base relating to the specific circumstances of the SPS site is not up to date because a review of the exceptional circumstances has not been undertaken (as set out in our Further Statement responding to Issue 5, question 8). As a result the Policies Map is not adequately informed by evidence.
- 2.6 To address this we have undertaken our own review of the land in question (see comment ID 331) and provide details of the exceptional circumstances together with a plan of relevant areas and photographs to support its removal from MOL (Appendix 1).
- 2.7 The exceptional circumstances case at SPS includes the following main points:
- 1 There is a need for the phased rebuilding of St Paul's School, which was originally constructed in the 1960s and has prefabricated CLASP buildings that are reaching the end of their functional life and require replacement/expansion to provide new school buildings together with ancillary facilities including on-site staff housing/ boarding accommodation. That need has been accepted and (and very special circumstances agreed) through the grant of a hybrid planning permission.
 - 2 The land that we consider should be removed from MOL is largely developed with buildings, parking areas and other hard surfacing – see photographs 4, 6, 7, 9-12 in Appendix 2). The land is also visually discrete or seen in conjunction with existing school buildings (see photos 1-4).
 - 3 There would be no harm to the wider MOL function as the land does not meet any of the strategic designation criteria for MOL (London Plan 7.17). The land in question:
 - i is not distinguishable from adjacent developed parts of the site,
 - ii does not contain strategically important recreation or leisure facilities
 - iii and does not contain important landscapes (being largely built on)
 - 4 The land that we consider to be unnecessarily or erroneously designated MOL is clearly visually distinguishable from the remaining MOL at the School (which largely comprises playing fields). Existing features within the School such as driveway/ roads and embankments would provide a clear and permanent boundary to the playing fields retained in MOL. This well-defined edge can be seen on photos 6, 8 and 11.
- 2.8 Should the Inspector wish to visit the School to look at this situation “on the ground” we would be pleased to arrange this.
- 2.9 To resolve our objection, the exceptional circumstances relating to the SPS site should be considered and the MOL boundary amended on the Policies Map to ensure that the plan is positively prepared, justified and consistent with national policy.

Appendix 1: Requested Amendment to Policies Map and Photographs of Area



Site Plan, 1.2000




Aerial Image, NTS

KEY

- Existing Metropolitan Open Land (MOL) boundary
- - - Proposed Metropolitan Open Land (MOL) boundary
- /// Denotes land proposed to be removed from MOL status

for consultation

Notes	Rev Date 00 17.08.2016	Amendment Issued for first consultation on the draft Local Plan		WALTERS & COHEN ARCHITECTS St Paul's School, Masterplan	2 Wilton Street, London W1C 3NL Telephone 020 7428 9751 mail@waltersandcohen.com		
					1604-PR-1002 MOL boundary	Job No. 1004	Drawing No. 1604-PR-1002
				Checked by MAC	Scale 1:2000@A1	Date Drawn 17.08.2016	© This drawing is copyright. Do not scale. Check dimensions on site.

Viewpoint 1



Viewpoint 2



Viewpoint 3



Viewpoint 4



Viewpoint 5



Viewpoint 6



Viewpoint 7



Viewpoint 8



Viewpoint 9



Viewpoint 10



Viewpoint 11



Viewpoint 12



Viewpoint 13

