

Comments on the Officers' Report On the Nishkam School Application

Keep Osterley Green, 2nd December 2015

The officers' report recommends acceptance of the applicants proposal to build a school on the White Lodge site. We have found that the report:

- (i) contains **serious omissions**;
- (ii) is full of **very misleading statements**;
- (iii) contains a high number of **factual errors on key points**;
- (iv) presents many key issues in a **systematically confusing way**.

There are so many such problems that this report cannot be considered to provide grounds for acceptance. Without answers to these points the Planning Committee would be in danger of determining on political rather than planning grounds.

With more time we could provide a far longer list of the report's deficiencies. We trust that the ones given below suffice to show that the **“very special circumstances” needed to build on MOL/Green Belt** have not been demonstrated.

Below we provide a detailed index of a list of serious problems in the report. We know that you may not have time to take in all the detail of our objections. We hope that you will look at some of our points to check that they are fully substantiated.

Our full analysis is here: <http://keeposterleygreen.org/our-case/>

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Our detailed points. Large format numbers refer to the numbered paragraphs in the officers' report

Park & Stride - Misleading

2.5 **WYVALE A “SHORT DISTANCE” AWAY.** “Larger scale buildings in the form of the Tesco Supermarket and Osterley Wyevale Garden Centre are a short distance from the application site.”

The Tesco building is two-storey and the Wyvale building is one storey (considerably lower than the proposed building). Moreover it is misleading to describe the distance between Wyvale and the school as “short”. It is a significant walk for primary age children along a dangerous with a narrow footpath. (Misleading)

The planning status of the land - Incorrect

2.7 “The whole of the application site is designated as Metropolitan Open Land (MOL) in the adopted Local Plan, but are otherwise **undesigned**.”

*We have found evidence in the Hounslow Local Plan and elsewhere and in the still valid sections of the UDP that the White Lodge site is designated also as Open Space, Publicly Accessible Open Space and Strategic Open Space and Regional Park (in the **London Plan**). **Local Plan - Key Diagram**, page 250, UDP - Map 1 Regional Settings. **UDP - Map ENV-N1**, Publicly Accessible Open Space. **UDP - ENV-N2**, Green chains and corridors. **London Plan - Map 2.8**, London’s Strategic Open Space Network.*

Relevant History – Key information omitted

3.1/2/3/4 This “Relevant history” fails to give the relevant information: **the reasons for the previous development refusals/approvals.**

(01106/152/P1): Building on Metropolitan Open Land. “....it would comprise the creation of additional buildings and floorspace in Metropolitan Open Land which would be unrelated to any outdoor sporting use or function, whilst also reducing the number of on-site football pitches would represent inappropriate development in Metropolitan Open Land, failing to have regard for the requirements of PPG2 (Green Belts) and also be contrary to Policies Env.4.7 (protection of MOL) & Env.4.8 (acceptable uses in MOL) of this Council’s 1996 UDP and Policies C.5.4 (outdoor recreation), C.5.5 (new leisure), ENV-N.1.5 (protection of MOL) & Env-N.1.6 (acceptable uses in MOL) of this Council’s Adopted 2003 UDP.... “

Poor Public Transport. “...it would comprise the creation of trip generating entertainment uses in a location with poor public transport, away from a main road or local centre, would represent development in an inappropriate and unsustainable location - failing to have regard for the requirements of PPG6 (Town Centres and Retail Development) and also contrary to UDP Policies ENV-B.1.1 (All New Development), C.5.5 (New private recreation/leisure), and IMP.1.1 (Integrating land use & transport)...”

Traffic, Noise and Pollution. “....it fails to provide suitable information in respect of the intended entertainment uses, parking arrangements and accessibility study, means the Council is unable to fully assess this issue. In the absence of this information, it is considered that the development would result in an increase in traffic volume, vehicular noise and pollution in a residential area, whilst also failing to provide an acceptable level of parking provision - representing an inappropriate and unneighbourly development and fail to have regard for the requirements of PPG13 (Transport) and also be contrary to UDP

Policies ENV-B.1.1 (All New Development) T.1.4 (parking provision) and T.1.2..."

It is remarkable to note that these are exactly what we find unacceptable about the current application which is far, far worse than this one on all of the above points. So is the council completely reversing its position on the site from what it was only 10 years ago...?

They also recognised substantial local concern around the building

Orientation of building should be such that noisy parts face the Piccadilly Line.

Building is an eyesore and two-storey part is completely at odds with the area;

Large glass elevation would overlook houses on Wood Lane;

Plans show a building 500m²+ larger than the existing 1,400m² floorspace.

01106/152/DEM1, 01106/152/DEM2. Both of these attempts at demolition were shown to be illegal or deficient in the required notice.

*The failure to provide this information is a serious omission because it shows that reasons given for approval/refusal on earlier developments on the site **are contradicted by those given in the case of this application.***

Incorrect/Confusing

4.1. "The proposal would result in the erection of a part two- part three-storey school building (5389sqm GEA) with associated access, parking, sports pitches and multi-use games area. "

This is utterly confusing. The applicant gives GIA of 9436 m in the application form. It gives 9470 GIA in the design and access statement and 5389 GEA in the planning statement. Why the different numbers for the same thing? How can there be a difference of over 4000 sq between the two measures?

Incorrect

4.2. The height of the building is given as 14 m. In paragraph 5.4 it is given as 15m (10.8 + 0.7 + 15m). Both figures breach the requirement of Hounslow Local Plan Policy CC3 which only allows for buildings of less than 10m to be built in Osterley.

Misleading

4.12. "The admissions policy is only allowed to accept 50% of pupils on faith grounds with the first category for admissions being for practising Sikhs and the second category, for open places, being allocated randomly."

This is correct. However the implication is that the school is in breach of the Academies Act (2010). This act requires that academies "(including free schools) provide places for children of all abilities, the majority of whom are from 'the area'. This means that their admission arrangements must allow for over 50% of pupils to be from the area". The DfE in their Free School Admissions Guidance (Dec 2014) refers to area as a statutory walking distance as being 2 miles for those under eight".

Key Facts Omitted/Misleading/Incorrect

5.3. It has to be noted that between the consultation carried out 26th August (sent to 820 households) and the one of 30th October (only sent to 328 households) the officer feels names the removal of one park and stride site as the only change having occurred between the consultation. **This is incorrect.** September 2015 saw the addition of the following files (as you can check on the KOG or the Hounslow websites).

00466620.pdf – Review of PERS Audit document which had been requested by TfL before the application was submitted.

00466619-1.pdf – PROJECT REPORT CPR2110 – further information on PERS

00466618.pdf – V&G letter in response to comments on traffic matters

00466617-1.pdf – Travel Plan (83 pages)

00466616-1.pdf – Park & Stride map for Osterley Hotel

00466615.pdf – Swept path analysis, Wood Lane

ArchaeologicalInvestigationSept2015.pdf

CoveringLetterForArchaeologicalReport200915.pdf

CoverLetterTransportData25092015.pdf

MapOfParkingSpacesUsesOrNot.pdf

SandersonResponseToRoadSafetyAudit.pdf

Stage1RoadSafetyAudit.pdf

TravelModeData.pdf

8571_Outer_London_Primary_and_Secondary_schools_sensitivity_review-1 (43 pages)

Key Facts Omitted

5.4. “Following receipt of an extensive representation from Keep Osterley Green on the 23/11/2015, any new issues that have been raised in this letter that were not raised in their initial submission received on 14/07/2015 will be reported by way of an addendum to this report, to be published prior to the committee meeting.”

This is completely unacceptable. KOG submitted a very detailed 418 page document giving its full reasons for rejecting the application. How can a recommendation be made without going through its points. It is hard to see this as anything other than a contemptuous dismissal and a pre-determined outcome whatever residents say.

“An assessment of the sites that had the potential to accommodate the ‘all-through’ school without the nursery has been made”.

In table 8 in the applicant's Sequential Test sites with an area smaller than 2.2 ha required to accommodate a nursery were rejected without any further assessment.

“The selection criteria were agreed prior to the compilation of the sequential analysis in conjunction with the Local Planning Authority, evidence of communications with owners not produced as requested.

Although these criteria were given by the council in the pre application exchanges the applicant has not applied them in its ST. e.g. disaggregation, height, format, sites that had planning permission not yet implemented.

Misleading

5.5. “125 representations from individuals have been received in support of the proposal as well as 1,339 letters from residents which have been forwarded to the Council by the Nishkam School Trust.”

This is both misleading and a very dubious claim. First the great majority of the so-called letters were actually pro-formas which merely required a signature. Large numbers were signed on the same date indicating mass signing sessions. Some do not carry a date and quite a few have no address. The letters therefore have even less status than a petition

which has been signed with all the signatories giving their addresses. Not only that but a post-code analysis shows that the overwhelming bulk of those signing the forms do not come from the area in which the proposed school would be located and would not therefore be affected by the development. Moreover most of the letter described as individual representations are also pro-formas but have been sent from individual homes. We have made a detailed analysis of these “letters” in our submission.

Key Facts Omitted

5.6. The consultation response of **Sport England**, a statutory consultee, is described in misleading terms. The report fails to state that Sport England did not merely give some “pre-application” advice. Rather, Sport England made clear that it was making a **formal objection** to the submission. Sport England also said that “It is disappointing that having participated positively in pre-application dialogue, Sport England advice and comments have not shaped this scheme.”

Confusing/Misleading

7.32/33. “With the Government’s current approach to school place planning, it is clear that provision for new education facilities cannot be met in a timely manner on the allocated sites identified in the adopted Local Plan alone, as highlighted in the Local Plan Submission 2015-2030 Education Topic Paper to the Local Plan examination, and so other policies of the Plan support new school uses on other sites where this is necessary to meet need.”

“The applicants and the Nishkam School Trust have worked closely with the Local Planning Authority on the methodology, approach for identifying absolute constraints, policy constraints and the parameters for site selection, as set out in the site sequential assessment. Whilst there is no clear policy guidance for the production of site sequential assessments in relation to new education provision, the approach that has been taken is considered to be appropriate and undertaken in a professional manner by a suitably qualified and experienced consultant.”

This gives the impression of an orderly agreed approach to site assessment. That is not what happened as is clear from the pre-application correspondence. The applicant declined to use the Cundall methodology (7 objective criteria). The officers dropped their objections to the many failures of the applicant to meet their repeated requests for a procedure in line with planning guideline **suddenly in June 2014 for no stated reason**.

Moreover, the council has allowed some of the few sites allocated for education to go for residential use. It has a duty to provide sufficient sites for educational development. It fails to do this and even fails to keep the few sites allocated for this purpose.

See **Hounslow Local Plan Submission Education Topic Paper 5.19 6.1**

Confusing and Incorrect

7.35. “... the delivery of a nursery is not currently funded by the EFA and as such does not form part of this application, but could be delivered at a later day by the Trust and incorporated into the school site. However, as an important aspiration of the school, the size criterion for the required built-form included the delivery of a 97 place nursery.”

This is pure gobbledegook. Either the nursery is part of the application or it is not. The applicant, and regrettably, the officers want to have it both ways. The site search was for a site that could include the nursery even though it is not part of the application.

This makes no planning sense and would be grounds for rejection for any application judged by normal planning standards. So why is it allowed here?

Confusing and almost certainly meaningless

7.36. “43 criteria”. What? Where are they? This is the first we have heard of such an impressive scoring system. How does it work? Where are the details? We think that we, and you (councillors) ought to know. How is it that this is only mentioned a week before determination? **This is bizarre beyond belief.**

Other sites we believe to have been unjustly ignored.

Site 23 Rectory Farm appears to be the best current choice in terms of ample size and location within the heart of Nishkam’s catchment area.

Questions about this site should be:

1. Who owns it?
2. Can the EFA obtain 2.2 ha for Nishkam?

Site 14 Hounslow Civic Centre would also appear to be ideal, and is located very close to Nishkam’s catchment area.

Questions about this site should be:

1. When did LBH agree to sell this site to housing developers?
2. Were they aware of the EFA’s desire to find a local site for Nishkam at this time?
3. If so, why did they not propose the sale of the site to the EFA?

Site 104 Land South of Western International Market appears to have been unreasonably ignored given its location within the heart of Nishkam’s catchment area.

Questions about this site should be:

1. Is ‘need for school places’ sufficient cause to amend S106 agreement, leaving about 80% of the site still open?
2. If not, why should MOL at White Lodge site be built on?

Site 135 Storage Yard at Church Road is similarly well located to sites 23 and 104 above.

Questions about this site should be:

1. Should not more effort be made to coordinate purchase from multiple owners
2. Is site still feasible despite listed building and if not why not?

Site 60 Concorde Club –again well located in a similar location to the above sites.

Questions about this site should be :

1. Would BA/the club be willing to sell a proportion of the site to the EFA/Nishkam?
2. Should the EFA/Nishkam not have been more proactive in re-contacting the club

Incorrect and very misleading

7.37. “ It was agreed with the Local Planning Authority that a site would be considered unsuitable if it was above 0.98ha but no additional site was available that could be physically linked to the site to form a total site area of 2.2ha, as this would prove too difficult for the operation of the ‘all-through’ school.”

Why 2.2 ha? That includes the nursery. Also there were adjacent meeting 1.96 ha were were not considered or were rejected because part was open space (i.e. a lower category

than MOL)! e.g. 671 London Road combined with Plain Peaches off London Road (site ref 11+43) were rejected due to the latter being open space.”

Open space has a lower level of protection than MOL/Green Belt so why should sites have been rejected on this basis?

But then there is the issue of sites less than 1.96 sites.

Site 131 Barnes Farm Allotments 1.80ha is probably best if it can be obtained as it is virtually right size for two schools and is located on the Cranford/Southall border. Allotments do not have a higher level of protection than MOL. We need convincing that the basic school size of 1.96 is so inflexible in terms of height and shape that it cannot find on this site.

Ommitted/Confusing

7.41. The “Public Transport Accessibility Level (PTAL) was not used as an assessment tool.” The PTAL rating is discussed for over 40 sites throughout the report. Why was this done if it was not a criterion? This is more confusion. The PTAL rating is given but no conclusions were drawn. We can think of no good reason by PTAL ratings should not have been used as an “assessment tool”.

Misleading – more special pleading about the nursery

7.42. “ Whilst it is noted that the sequential assessment includes provision of a nursery within the site area (i.e. 2.21ha sites were sought) but does not form part of the current planning application, it is not considered that the inclusion of a nursery within the school’s proposals as part of the site sequential assessment would be inappropriate as this has been clearly highlighted as a key requirement of the delivery of a new school to meet the needs of the Nishkam School Trust.”

This is pure confusion. We are told (a) that sites were searched for an area not including the nursery, (b) that only sites above 2.2 ha were considered i.e. including the nursery and (c) that it is in order to include the nursery even though it is not in the application because it is part of the applicants aspiration.

The site area minus nursery is given as 1.97 in para 7.42 and 1.9 in para 7.43

Omitted, Misleading, Incorrect.

7.43. “An assessment of the sites that could deliver the school without the nursery has been made based on the sites that would be capable of delivering the school on their own (i.e. between 1.9ha and 2.2ha) or in combination with an adjoining site (where they were below 1.9ha).” The sites listed by the report are Bulls Bridge Industrial Estate, St Pauls Primary School and playground, Riverbank Way, Convent Way Recreation Ground, Casiobery Playing Field, The Cedars Primary School.

Regarding the sites referred to in this section :

- **Bulls Bridge Industrial Estate** is 2.13 ha and right on the borders of Heston and Southall and as such is ideally located if Nishkam/EFA could obtain it. It could even accommodate the nursery with slight trimming of plans. Given the high quality of this site, it is unacceptable that it is shrugged off as unobtainable due to the multiple ownership. Given the number of industrial sites that have been turned into housing, we do not believe this should be a showstopper either.

- **Convent Way Recreation Ground** is 2.11 and far closer to Nishkam's catchment and expression of interest area than White Lodge. Given this is the case, we do not think it is acceptable for the council to attempt to preserve this site whilst agreeing to development on the White Lodge one

But then there is the issue of sites less than 1.96 sites

Site 131 Barnes Farm Allotments is probably best if it can be obtained as it is virtually right size for two schools. Allotments do not have a higher level of protection than MOL.

Misleading and inaccurate

7.55 "By using the land as sports pitches for the school and community to share, the proposal will bring back the open land into community use, where this has previously been closed to public use."

This is highly misleading and inaccurate. The site had been purposely allowed to deteriorate and permitted sports development was refused. It continued to be used for informal recreation. As Mr Coomber said In his officer's report of 7 September 2015, regarding application 01106/152/DEM2, Mr. Coomber writes that

"The applicants state that access to the site has not been permitted by any persons for any public use since 2007. That said, it is clear that members of the public have used the land for informal recreation and the site has frequently been open to public access."

Any decline in use was a result of deliberate policy. That would not have happened if the owner and the Council had carried out their obligations to maintain the sports use of the site. It is therefore a very twisted argument to say that a new development should be supported because it will give back to residents something of what they should have had anyway.

Misleading

7.58 The report refers the Paragraph 74 of the NPPF which says that existing land use for sports should not be built on unless one of three conditions is met (1. the provision is surplus to requirements, 2. the loss will be made up by equivalent or better land, (3) the development is for alternative sports and recreation provision). It is clear that none of these conditions is met.

Incorrect

7.59 It is claimed that sports use of the site ceased in 2007 with the dissolution of the Hounslow Borough FC. This is not the case because after that the site was still hired out for private organised events and was used for informal leisure and sporting activities.

7.60 In this para the officers argue that NPPF paragraph 74 doesn't apply "rigorously" because the site is not currently operating. First we should not the Borough's unfulfilled obligation to ensure that the site remained in sports use. Second, this is an absurd approach because it means that to negate sports use of open land landowners have merely to refuse to fulfil their obligations. This makes deliberate neglect into a tool for changing the status of a site like this and for disregarding planning policies.

7.61 In this section the report makes an assertion about the school's "unique requirements" but doesn't tell us what they are. Is this the way to evaluate

planning applications?

Incorrect

7.63 It is claimed that the land is “currently redundant and unused (and in private ownership)”.

The redundancy of the land has nowhere been argued. It has been used until the EFA prevented the public from continuing informal use. It is no longer in private ownership but is owned by a public authority.

Incredible

7.65 After stating that the fundamental aim of MOL is to “protect open characteristics within the metropolitan area” the officers say “ It is considered that allowing a school on this site **will fulfil the aims of MOL**”. This is not only mere assertion rather than reasoned argument it totally contradicts paragraph 7.5 and other where the simple fact that this is obviously inappropriate development is clearly recognised. Here the claim is that that after it is actually appropriate! Later in 10.0 it is recognised that “The harm to the openness of the MOL caused by the introduction of the 2 and 3 storey building ...”.

Confusing

7.78 The argument here is strange because the officer recognises that the 2/3 story structure leads to a larger footprint that would have been achievable with building higher. This reflects back on the Sequential Site Test because it acknowledges that a taller building could have been appropriate in other areas without changing the character of the school. Once again, we see that the SST is deficient because it did not consider all the possibilities before looking to build on MOL.

Incorrect

7.115 “ The Local Planning Authority could not impose a condition on school admissions, requiring that the admissions policy only accept children on a proximity basis, as that would fail the tests for conditions contained in the National Planning Policy Guidance (NPPG).”

This is incorrect see section Free School Admissions Guidance, December 2014 (v3), paragraph 12.

The Map on page 91 is misleading because it does not reflect the actual area that the school site will occupy. This makes it impossible to evaluate the harm done to that part of the site (just under half the site).

General comment

The phrase “It is considered that” is used throughout the document (about 40 times). It indicates a purely subjective judgement (no objective references or criteria). We do not believe that an assessment of the pros and cons of a major development should be approached in this way.

Keep Osterley Green: Comment on Traffic and Travel in the Officers Report

(Application to develop a Nishkam School on the White Lodge site)

2nd December 2015

LBH PLANNING OFFICER	KOG COMMENT
<p>5.4 <i>The Transport Assessment has been undertaken in conjunction with Council Officers and is considered to be a robust assessment that uses standard data sources and considerations. I ... the delivery 'Park & Stride' sites to provide parents with a site to drop-off/collect children close to the site away from the surrounding residential roads and improvements to the footpaths around the site to make these safer for use. A School Travel Plan has been submit which indicates the measures the School will employ to promote use of alternative modes of travel to the site and this will be secured as part of this application. A right hand-turn land will be provided on Syon Lane to ensure that vehicles waiting to cross Syon Lane and enter the site do not block the flow of traffic along Syon Lane. This is covered in more detail in paragraphs 7.98-7.</i></p>	<p>How can it be robust when it is based on questionable and unreliable TRICS data?</p> <p>Parents will still drop-off on residential roads especially as the Osterley Park Hotel has been dropped as a P&S site. Footpaths will still be dangerous from Wyevale Garden Centre despite these improvements. Mitigating measures are unenforceable, as evidenced at the London Road Nishkam School site.</p>
<p>5.6 Parking and access: The commitment by the applicant to secure marshalling procedures (reviewed annually), alongside other 'soft' measures, to deter parents from parking where they shouldn't and to mitigate other parking impacts, is welcomed.</p> <p>TfL remains concerned about, and does not support, the principle of 'Park & Stride' since such mitigation measures may encourage more parents to use their car to take children to school and then onwards to work or other activity, especially in regard to the proposals for parent parking and drop-off in the Osterley Park Hotel. It is also noted that the drop-off arrangement at a plant nursery off Syon Lane (a local road) was criticised in a submitted safety audit, although highway mitigations have been suggested by the applicant. It is not indicative that a straightforward and safe arrangement can be secured, albeit this is a local road and the arrangement may be refined with the highway authority.</p>	<p>It might be a commitment but it is unenforceable.</p> <p>The issue of P&S and safety has still not been fully addressed particularly in relation to narrow footpaths that cannot be widened eg the bridge across the tube line, and alongside the listed Seacombe wall.</p>
<p>7.121 The majority of pupils are anticipated to arrive from the south</p>	<p>Wyevale P&S is to the north; and Tesco has not yet agreed to P&S, so this is a wrong assumption.</p>
<p>7.122 It is proposed to introduce "No Waiting" and "No Loading" restrictions and "School Keep Clear" markings on Syon Lane, subject to statutory consultation, to prevent dropping-off. The "School Keep Clear" markings can be enforced by camera but the remaining restrictions would need to be enforced by the Council's</p>	<p>Unenforceable, just like at the current temporary school site on London Road.</p>

Civil Enforcement Officers (CEOs).	Who will fund the CEOs?
7.126 Since the applicant predicts that most pupils will live to the south and west of the site ... However, this access will need to be carefully managed to ensure that parents do not see this as an opportunity to drop-off on Wood Lane which would not be acceptable. This access should not be available for pupils whose parents have tried to drop-off by car on Wood Lane or Braybourne Drive. The proposed introduction of "School Keep Clear" markings will assist, as will the current status of Wood Lane as a bus clearway. The applicant is proposing that school marshals will be used to ensure that parents do not drop-off on Wood Lane or Braybourne Drive, and this approach will be secured in the School Travel Plan and S106 agreement.	Not true. Nishkam's own data on registration of interest (2013-15) show that many pupils (44%) would come from UB postcodes alone. How will this be managed? It is unenforceable. Not if the H28 is rerouted off Wood Lane. Unenforceable, just like at the current temporary school site on London Road.
7.127 The School is expected to ensure that parents who attempt to drop-off by car on Wood Lane or Braybourne Drive are advised that they should use an agreed 'Park and Stride' site otherwise pupils will be expected to enter the School from Syon Lane. There will need to be a zero-tolerance approach to this policy by the school (i.e. "naming and shaming" of parents who flout this rule) and the School Travel Plan will set out how this will be managed.	Unenforceable, just like at the current temporary school site on London Road.
7.128 ... Postcode data provided by the applicant indicates that the majority of pupils will live to the south and west of the school so this is could be used by people using Jersey Road.	Not true. Nishkam's own data on registration of interest (2013-15) show that many pupils (44%) would come from UB postcodes alone.
7.131 The majority of the accidents recorded were slight (64), with 4 serious accidents and no fatal collisions recorded.	Not true. There have been at least 3 fatal accidents at the Wood Lane/A4 junction in the last few years.
7.132 The applicant concluded that the collisions were generally a result of driver error and that road layout was not considered to be a contributory factor in the collisions.	The A4/Wood Lane junction is dangerous and there have been a number of fatal accidents.
7.135 Younger children are generally escorted to and from school and the routes from the 'Park and Stride' sites in particular need to be safe whether they are escorted by parents or by School staff. The proposed improvements around the School address the issues raised by the independent auditors.	The proposed improvements are insufficient, as the narrow paths can't all be widened (restrictions of bridge over tube line and along Seccombe listed wall).
7.136 The pedestrian route audit indicates in particular that there are concerns with the route from the Wyevale Garden Centre, the main concern of the auditor being the narrow width of the footway for part of this route. The audit recommended some initial improvements including clearance of foliage and branches, and improvements at dropped crossings and side roads.	This will not address the problem of the narrow paths which can't all be widened (restrictions of bridge over tube line and alongside the Seccombe listed wall).
7.138 ... It is considered that although all younger children would be escorted from the northern 'Park and Stride' site, which is not uncommon, further consideration should be given to running a minibus service from the site to the school. This would be secured through the School Travel Plan as part of the on-going monitoring.	This minibus service from Wyevale garden Centre has not been mentioned anywhere before.
7.140 It is considered that this number of spaces will encourage staff to use other modes of travel to get to school. As	No it won't, they will just try to park on the nearby streets!

well as the H28 and H91 buses, the Syon mainline Rail Station is within 10 minutes' walk. The School Travel Plan promotes car sharing and use of alternative modes of transport by staff.	Syon Lane is 1.1 km away (0.7 miles); at 3 mph walking rate that would take 14 mins. If it took 10 mins the walking speed would be 4.14 mph!!!
7.144 ... However, officers consider that much of Wood Lane is unsuitable for parking because of the impact of parked cars on traffic flow and road safety and is not to be encouraged. Therefore, the School will need to actively discourage parents from dropping-off in this location and also staff from parking here and on Braybourne Drive. The introduction of waiting and loading restrictions on Wood Lane has been proposed ... highway works.	Unenforceable
7.146 The applicant predicts that up to 115 staff could drive to the School and if this were to occur there would be overspill parking required for 30 vehicles. It is unlikely that these could be accommodated on the site and therefore a key travel plan target ...	Staff will just try to park on the nearby streets.
7.150 ... Overall the redevelopment of the BSKyB campus will help to consolidate parking within the site and should reduce the impact of on-street parking within the area. The BSKyB Travel Plan is a key tool in retaining high public transport mode share and ensuring that single occupancy car trips are minimised.	But more parking at SKY will encourage more SKY staff to drive, therefore more traffic and continued parking problems on local streets.
7.151 It is acknowledged that parents often try to park as close to a school as possible and this would not be acceptable at this location given the nature of surrounding streets. The introduction of waiting and loading restrictions and "School Keep Clear" markings on Syon Lane and Wood Lane will help in this respect.	Unenforceable, just like at the current temporary school site on London Road.
7.152 The School Charter states that parents agree to abide by specifically states that parking on surrounding streets is not permitted. Parents will be told to use the 'Park and Stride' sites if they must drop-off or collect by car.	Unenforceable, just like at the current temporary school site on London Road.
7.154 The Tesco car park could be used by parents because parking is allowed for up to 3 hours and has plenty of spare capacity at drop-off time. Vehicles using this car park would be unlikely to lead to a severe traffic impact because the traffic modelling has already assumed that they would be using this junction.	But you can only park in Tesco for 3 hrs if you are shopping there! So let's forget about getting Tesco approval for P&S, let's just park there anyway!! There would be gridlock at this junction as it is often already blocked due to heavy southbound traffic on Syon Lane in the mornings.
7.159 Dedicated School Bus: 27% (373 pupils) - based on a phased implementation, starting with three buses on first occupation and seven once the school is fully occupied (subject to monitoring). This is the main means of reducing traffic generation; Walking, Cycling and Scooting: 30% 'Park & Stride': 7.5% (107 pupils) - Car share: 7.5% (107 pupils)	First mention of 7 buses, and is this 7 buses on each of the 3 routes, or is it 7 routes or what? How will pupils living in UB postcodes get to the school? We have already commented extensively on these underestimates on numerous previous occasions.
7.160 All car trips have been allocated as 'Park and Stride' trips	Disagree with the last

<p>given that the aim is to prevent parking on local roads. The percentage of car trips and car share trips, at 15% of the total school trips, is lower than the average for other Hounslow schools with a low PTAL (28% for primaries and 16% for secondaries, giving an average of 22%) but the School Travel Plan sets out the means proposed by the applicant for ensuring this lower percentage can be achieved. The main reason for the difference is the provision of school buses which the applicant expects would account for almost 27% of all trips, largely replacing car-borne trips.</p>	<p>sentence. At the Nishkam Secondary School in Birmingham, 52% of pupils come to school by school bus, and yet 32% are still coming to school by car.</p>
<p>7.161 The assessment is considered to be acceptable in principle bearing in mind the range of comparison sites. It should be noted that for the comparison sites the number of car-borne trips form a percentage of total trips (i.e. the school would not be expected to generate an additional 1400 car-borne trips) and that sustainable modes of travel are generally the most popular. It is acknowledged that the potential catchment area for this school is wider than others in the Borough, although smaller than Gumley House School in Isleworth, and this could lead to a higher level of car-borne trips. However, the applicant proposes mitigation measures to reduce this percentage to that which is proposed.</p>	<p>The average travel distance for the 5 secondary schools in Hounslow is 2.6 mls and it is 3.85 mls for Gumley. We can expect the average travel distance for Nishkam to be at least that for Gumley if not further. 44% of pupils could be coming from UB postcodes.</p> <p>Mitigation measures unenforceable.</p>
<p>7.162 The applicant predicts that 700 primary school and 700 secondary school pupils would be expected to generate in the region of 214 vehicle two-way trips in the mornings and afternoons (i.e. 107 arrivals and 107 departures related to drop-off). This does not include staff or servicing trips, which are expected to take place outside of peak school hours. As stated above, this is based on the proposed mitigation measures set out within the travel plan and secured in the S.106 agreement or by condition.</p>	<p>We have already commented in detail on the inaccuracy of these forecasts.</p> <p>Staff would be travelling during the morning commuter peak, so you can't dismiss their 120 car journeys coming into the area.</p>
<p>7.163 The number of car trips that could be generated without the School Travel Plan measures, based on the average obtained from the Hounslow school Travel Plan data, Hands Up Survey, and TRICS data could be 541 in the morning (270 arrivals and 270 departures) and 504 in the afternoon (252 arrivals and 252 departures).</p>	<p>We think it would be at least double this figure.</p>
<p>7.164 It should be noted that pupils of secondary schools are less likely to be driven to school and this is reflected in the modal split predictions. There is also a significant difference in the number of secondary pupils arriving by public bus.</p>	<p>Not true when the site is PTAL 1b and many children will be coming from UB postcodes.</p>
<p>7.165 The applicant has estimated the likely distance travelled by pupils based on postcode data from the existing school site on Wood Lane. This predicts that the distance travelled by primary school pupils would be further than the Borough average. However, the distance travelled by pupils as they graduate to the secondary school would be similar to the Borough average for secondary schools and would be better than the average for Gumley House School in Isleworth.</p>	<p>But you should also have done the calculations based on the location of registered interest in the school and that gives a different and much more concerning picture (44% coming from UB postcodes).</p>

<p>7.167 This staged approach to the increase in pupil numbers will allow monitoring of the School Travel Plan targets to take place year on year. As a result the measures that are put in place can be monitored and additional measures implemented if required. Measures such as the provision of school buses, 'Park and Stride', regular monitoring and liaison with local residents and councillors will be specifically secured within the s106 agreement along with the School Travel Plan itself.</p>	<p>The continuing problems at the London Road site don't seem to suggest that these measures will work.</p>
<p>7.169 Automatic Traffic Counts were also recorded across the week to determine both traffic flows and speeds. The average daily traffic flow on Syon Lane was recorded as being 7,897 northbound and 7,550 southbound. The 85th percentile speeds were 38.1mph northbound and 34.3mph southbound. There was less traffic on Wood Lane, with an average daily flow of 1,328 northbound and 1,996 southbound. The 85th percentile traffic speeds were 28.3mph northbound and 28.5mph southbound</p>	<p>Speeding on Syon Lane (speed limit of 30 mph)</p>
<p>7.171 It is noted that at present southbound traffic on Syon Lane can queue back across the site at peak times. However, it is noted that the queue is generally not static and Officers have noted from site visits that the queue does not always stretch as far as the site. Measures to reduce the potential for additional traffic on Syon Lane are being proposed as part of this planning application and the dedicated school bus and use of 'Park and Stride' sites in particular are intended to do this.</p>	<p>But 44% of pupils could come from the north and west therefore coming by car southbound along Syon Lane which often already tails back along Windmill Lane to the M4 underpass and sometimes further back.</p>
<p>7.172 The applicant has estimated trip distribution based on the location of pupils at the existing Nishkam School on Wood Lane. This indicates that the main catchment area is based to the south and west of the application site. The applicant has also made an assessment on potential routes that parents would use. Parents travelling from the south and west were assumed to use Thornbury Road and Jersey Road rather than the Great West Road because these routes are less heavily trafficked. These parents would be directed to the Wyevale Garden Centre 'Park and Stride' site. A further 10% are predicted to arrive at the School using Windmill Lane, meaning that site would account for around 60% of car-borne trips. The remaining 40% would approach from the Great West Road and would likely use the Tesco car park.</p>	<p>don't know where to start on this paragraph! The applicant should also have used its own data of registered interest which shows that 44% would come from UB postcodes and this analysis would give a quite different picture. Most pupils would be coming from the north, north west and west, NOT south.</p> <p>Tesco has not agreed to this!</p>
<p>7.173 It is considered that a third 'Park and Stride' site to the south west of the school would have the potential to remove some of this traffic from Jersey Road. A site was originally proposed at the Osterley Park Hotel but this site is no longer available. This does not affect the modelled trip distribution but the School Travel Plan will include a commitment from the applicant to find alternative 'Park and Stride' sites to accommodate people travelling by car from the south and west.</p>	<p>In the Planning Application it says that the Osterley Park Hotel was taken off the list because of TfL objections, yet you are suggesting here that the hotel withdrew its offer? So which is it? And where and when are you going to find a substitute P&S site? What if there isn't one (likely scenario)?</p>
<p>7.175 TfL is the Highway Authority for junctions 4 and 5 and they have confirmed that they are satisfied that the trip generation and distribution is reasonable.</p>	<p>What about the Wood Lane/A4 junction?</p>

7.176 As previously discussed, the applicant predicts that 107 pupils are likely to travel to and from the Nishkam School by car with a further 107 by car share (i.e. an assumption of 2 pupils per car). Taking into account two trips for each vehicle (drop off and drive off), each morning (07:00-10:00) and afternoon (14:00-17:00) there will be 107 vehicle trips and 214 walking 'Park & Stride' trips.	Nishkam's forecasts for the London Road site were grossly underestimated and so would these figures prove to be. We suggest there will be ~1320 car journeys in the morning peak alone.
7.177 The inputs for the traffic models were actually based on a previous trip generation methodology, which estimated the following number of vehicle trips: 08:00-09:00: 183 trips (120 arrivals, 63 departures); 15:00-16:00: 135 trips (46 arrivals, 89 departures); and Daily: 645 trips (323 arrivals, 322 departures).	We suggest there will be ~1320 car journeys in the morning peak alone and probably a similar number in the afternoon.
7.178 Whilst these numbers of trips are smaller than the final predicted traffic generation figures, the 'Park & Stride' arrangements had yet to be determined so it was assumed that all vehicles (whether from the north or the south) would be driven to the school and travel through the modelled junctions thus providing a robust assessment.	How can it be robust when the same methodology was used for the London Road site and proved to be a gross underestimate!
7.179 The location of the 'Park & Stride' sites means that fewer vehicles are likely to use Syon Lane north of the Tesco store because parents will not be able or allowed to drop-off on that road. However, this means that the modelling is robust even if some of the trips are made through Syon Lane, e.g. by parents continuing their trip to work.	I don't understand the logic behind it. And the modeling is far from robust as has been proven by grossly inaccurate forecasts for the London Road site.
7.180 Committed developments (i.e. those with planning permission), in particular the BSKyB Campus and the Gillette building, were also taken into account, to assess the cumulative effects of development on the network. This assessment excludes any future developments that may, or may not, come forward. Any future planning applications in the area will need to consider the cumulative impact on the network.	No mention made of the proposed Bolder Academy (HIP school) across the road on the Grasshoppers site with 1100 pupils.
7.181. 1) Windmill Lane/Syon Lane/Jersey Road/Osterley Lane mini roundabout - the junction currently operates within capacity. However, the data indicates that by 2017 the junction could require improvement to continue to operate within capacity due to committed development traffic. However, the applicant states that during the validation of the model the observed queues did not match the predicted queues and therefore this would lead to an over-estimate of the impact by the traffic model by 2017. It should also be noted that the traffic modelling assumes that all school traffic on Jersey Road would turn right into Syon Lane which impacts on the capacity of the junction by blocking traffic approaching from Windmill Lane. However, this traffic would actually turn left to the 'Park and Stride' site on Windmill Lane meaning that the actual impact on the junction would be reduced. It is unlikely, therefore, that there would be a severe residual impact at this location.	Lots of car journeys from the north and west, H28 rerouting, parents and children crossing the road, slowing down of traffic due to 20 mph restriction and additional crossing will all slow traffic down and cause build up on Syon Lane and at this junction.
2) Tesco access/Syon Lane roundabout - the junction	But not if it is used by parents

<p>operates within capacity in all the modelled scenarios.</p> <p>.....</p> <p>5) Great West Road/Thornbury Road signalised junction - the junction appears to be currently operating just above capacity. It is expected that capacity will be exceeded in all future year models but as above, TfL does not object to the increase in traffic and it would fall within expected daily fluctuations.</p>	<p>as a dropping-off point even without Tesco approval for P&S.</p> <p>What about the Wood Lane/A4 junction?</p>
<p>7.182 Measures to prevent drop-off either within the site or on roads in its vicinity, especially Syon Lane and Wood Lane, should ensure that the impact of the development, as predicted by the traffic modelling, would not be severe. Such measures need to be actively promoted in order to ensure that increased traffic is minimised and there is not a severe residual impact as a direct result of the proposed development. These will be secured in the S.106 agreement or by condition. It is considered that if these measures are introduced they would provide appropriate mitigation.</p>	<p>Unenforceable, just like at the current temporary school site on London Road.</p>
<p>7.183 TfL, which has responsibility for providing bus services, considers that the impact on bus services will not be so significant so as to require a contribution towards improvements. TfL has already secured funding for public transport improvements from the Free School programme and considers that any required improvements can be secured using this funding.</p>	<p>PTAL 1b, so parents will be driving their children in anyway.</p>
<p>7.184 As stated elsewhere TfL is currently consulting on changes to bus routes in the vicinity of the site. The main impact would be to the H28 with buses being routed away from Wood Lane and onto Syon Lane. TfL is aware of the proposals for the School and if permission were to be granted, the provision of bus stops to serve the School would be sought.</p>	<p>If the H28 is rerouted to Syon Lane there will be more congestion on Syon Lane, especially when the buses stop at bus stops to drop off and pick up passengers, causing traffic to stop and wait behind the stationary buses.</p>
<p><i>School Travel Plan</i></p> <p>7.190 The school has produced a School Travel Plan for the proposed site. The draft sets out the predicted trip generation and modal share and then uses this to set targets for reduction in car-borne trips to the site. This is considered to be acceptable in principle but the key measures will be specifically secured in the S.106 agreement. This includes 'Park and Stride' sites, school buses, use of marshals and a commitment to monitoring and review. A final travel plan will need to be submitted and agreed prior to occupation. This should be based in part on information within the travel plan for the existing Nishkam School site on Wood Lane and should also secure relevant measures as discussed in this report.</p>	<p>Unenforceable, just like at the current temporary school site on London Road.</p>
<p>7.191 The draft School Travel Plan addresses the key issue of reducing traffic impact around the site. Key measures within the travel plan will be the provision of school buses to reduce the</p>	<p>Unenforceable, just like at the current temporary school site on London Road.</p>

<p>traffic impacts on Syon Lane and Wood Lane, use of suitable 'Park and Stride' sites so that those parents who do drop-off by car do not do so on streets surrounding the site, and the provision of marshals around the school.</p>	
<p>7.192 The applicant proposes to run school buses (as they do at their existing school in Birmingham) as an alternative to parents driving their children to school. The site has a low PTAL rating and therefore this is considered to be an acceptable mitigation measure. It should be noted that BSKyB already runs a shuttle bus service for its employees to reduce the need to travel to the site by car.</p>	<p>This omits to say that at the Birmingham secondary school site although 52% come by school bus, 32% come by car!</p>
<p>7.193 It is proposed to provide 3 buses initially to serve the 450 pupils who would be based at the school in the year of opening and 3 potential routes have been identified based on the postcode data for the existing School in Wood Lane. The applicant has identified that 117 pupils could use the school buses. These would serve Heston via Jersey Road, Central Hounslow via London Road, and Hounslow West via the Great West Road. However, the routes would be continually monitored so that changes can be made to ensure maximum use.</p>	<p>What about the 44% of pupils who might be coming from UB postcodes? How would they get to the school? By car of course!</p>
<p>7.195 The applicant is proposing to provide 'Park and Stride' sites and 1 has formally been secured at the Wyevale Garden Centre on Windmill Lane. The principle of park and stride is a common way of minimising traffic impacts around schools. The removal of a 'Park & Stride' site from the application (Osterley Park Hotel) would not have an adverse impact on the surrounding roads based on the traffic distribution modelling and modal split. It is considered acceptable in this location given that drop-off on roads directly adjacent to the site is not considered to be acceptable for reasons of highway safety.</p>	<p>NOT TRUE!!!! Park & Stride will encourage parents to drive. It will bring more cars into an already very congested Osterley during the AM peak!!!</p> <p>Parents will still drop-off on Wood Lane and Braybourne Drive, and other nearby roads.</p>
<p>7.196 Many schools also use sites for park and stride in an unofficial capacity and it is noted that the Tesco car park on Syon Lane allows parking for up to 3 hours and could, therefore, be used by parents. The car park is not heavily used in the morning and is a short walk from the application site. As part of the highway works it is proposed to improve the route from Tesco to the site. These improvements would be required whether or not the car park is used as a 'Park and Stride' site because Syon Lane provides a link to bus stops and also to the A4.</p>	<p>I can't wait to hear what the Tesco manager will have to say about this; parents using his car park when they are not shopping?! The Tesco car park is for shoppers. And Tesco have not yet given approval to be used as a P&S location.</p>
<p>7.197 The travel plan sets out targets for staff travel based on the proposed number of parking spaces. This is to ensure that there will not be a significant amount of overspill parking.</p>	<p>But there will be overspill parking on nearby roads.</p>
<p>7.198 On-going consultation with the local community will be essential in order to ensure that any problems are identified and addressed at as early a stage as possible. Regular community liaison meetings will form part of the travel plan.</p>	<p>THERE HAS BEEN NO "ON-GOING CONSULTATION"! And ask the residents near the current London Road school what is happening</p>

	there – problems with dangerous drop-offs. Bodes very badly for the proposed school.
<p>7.200 A full and detailed assessment of the traffic and transport impacts of the proposed development has been undertaken. It is considered that although there will be an increase in traffic generation the impact of the proposed development is unlikely to have a severe traffic or transport impact, including cumulative impacts taking into account committed developments, and therefore meets the test set out in the NPPF in terms of whether a development is acceptable or not.</p>	<p>The traffic and transport impacts have not been fully assessed. Problems remain unresolved. Inappropriate data was used and unrealistic assumptions made.</p>
<p>10.0 CONCLUSION</p> <p>It has also been satisfactorily demonstrated through the Transport Assessment and accompanying Travel Plan that the proposed school would not result in a severe adverse impact on the local road network.</p> <p>As a consequence, it is considered that the socio-economic benefits of the proposed development, in helping to meet an identified, unmet local demand for school places, coupled with the wider community benefits that would be established through a Community Use Strategy, and the absence of any severe harm to the local road network or neighbouring residents, would outweigh the loss of this area of MOL in this instance. Whilst the proposal would be contrary to Local Plan policy GB1 and the relevant policies on Metropolitan Open Land in the London Plan, it is considered that this is outweighed by the compliance of the proposal with adopted Local Plan Policies IMP1, IMP2, GB4, GB7, CC1, CC2, CC4, CI2, EQ1-6, EQ8 and EC2 and the London Plan.</p>	<p>Our detailed analysis in our objection to the application shows that this has certainly not been “satisfactorily demonstrated”</p> <p>There are no benefits which could not be equally provided by maintaining the sports use of the site.</p> <p>We have shown that the traffic impact would be huge in a highly congested area. How can compliance some policies in the local plan “outweigh” lack of compliance with other policies? Does it say somewhere that only a fraction of applicable policies need to be observed?</p>