



STRATEGIC PLANNING COMMITTEE AGENDA

7.00 pm

**Thursday
6 January 2022**

**Council Chamber,
Town Hall, Main Road,
Romford RM1 3BD**

Members 8: Quorum 4

COUNCILLORS:

**Conservative Group
(4)**

Dilip Patel (Chairman)
Timothy Ryan (Vice-Chair)
Ray Best
Maggie Themistocli

**Residents' Group
(1)**

Reg Whitney

**Upminster & Cranham
Residents' Group
(1)**

Linda Hawthorn

**Independent Residents
Group
(1)**

Graham Williamson

**Labour Group
(1)**

Keith Darvill

For information about the meeting please contact:

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**To register to speak at the meeting please call 01708 433100
before 4 January 2022**

Protocol for members of the public wishing to report on meetings of the London Borough of Havering

Members of the public are entitled to report on meetings of Council, Committees and Cabinet, except in circumstances where the public have been excluded as permitted by law.

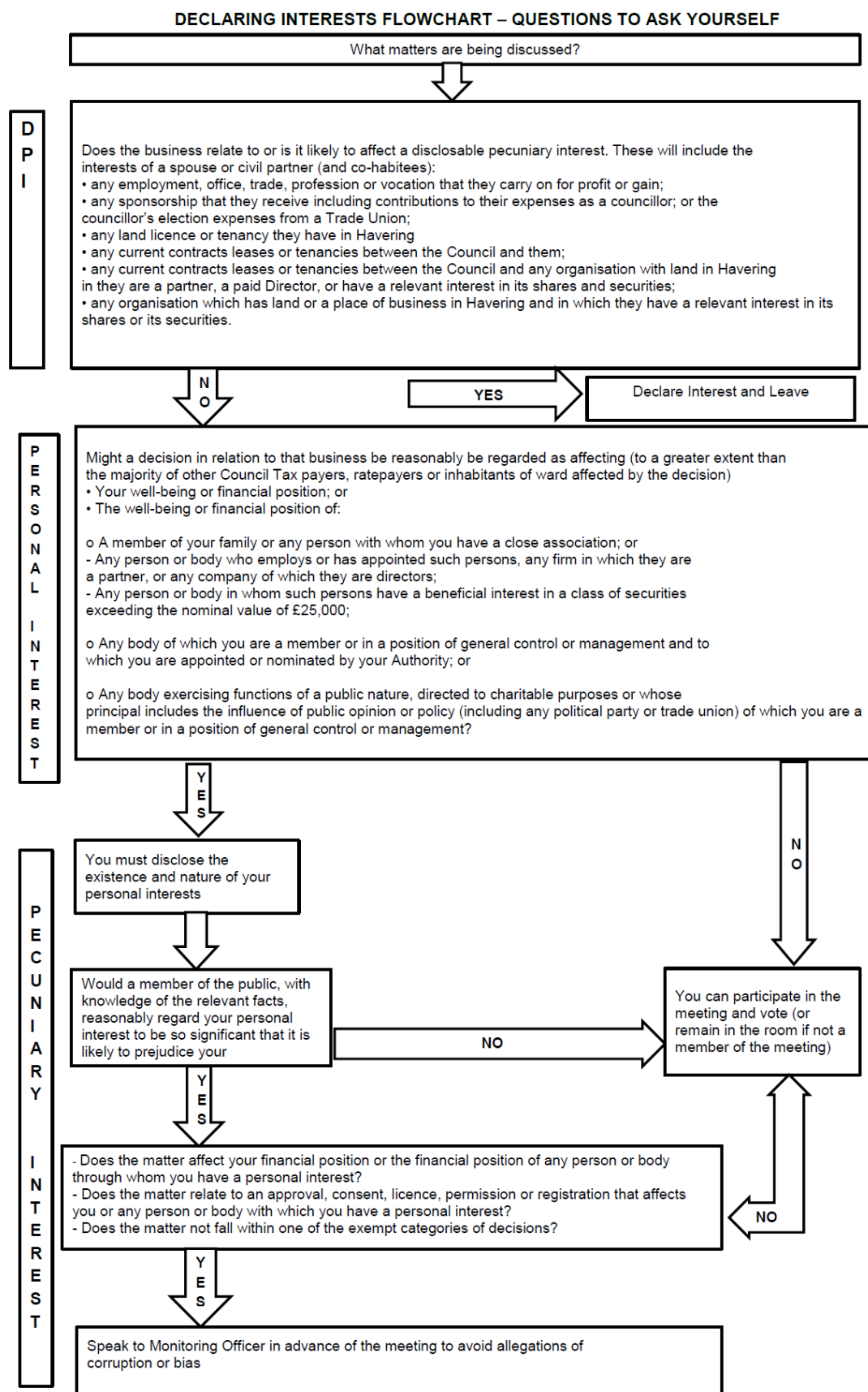
Reporting means:-

- filming, photographing or making an audio recording of the proceedings of the meeting;
- using any other means for enabling persons not present to see or hear proceedings at a meeting as it takes place or later; or
- reporting or providing commentary on proceedings at a meeting, orally or in writing, so that the report or commentary is available as the meeting takes place or later if the person is not present.

Anyone present at a meeting as it takes place is not permitted to carry out an oral commentary or report. This is to prevent the business of the meeting being disrupted.

Anyone attending a meeting is asked to advise Democratic Services staff on 01708 433076 that they wish to report on the meeting and how they wish to do so. This is to enable employees to guide anyone choosing to report on proceedings to an appropriate place from which to be able to report effectively.

Members of the public are asked to remain seated throughout the meeting as standing up and walking around could distract from the business in hand.



AGENDA ITEMS

1 CHAIRMAN'S ANNOUNCEMENTS

The Chairman will make his announcement including the protocol for the meeting during the Covid-19 pandemic restrictions.

Applications for Decision

I would like to remind members of the public that Councillors have to make decisions on planning applications strictly in accordance with planning principles.

I would also like to remind members of the public that decisions may not always be popular, but they should respect the need for Councillors to take decisions that will stand up to external scrutiny or accountability.

2 APOLOGIES FOR ABSENCE AND ANNOUNCEMENT OF SUBSTITUTE MEMBERS

(if any) - receive.

3 DISCLOSURE OF INTERESTS

Members are invited to disclose any interest in any of the items on the agenda at this point in the meeting.

Members may still disclose any interest in an item at any time prior to the consideration of the matter.

4 MINUTES (Pages 1 - 2)

To approve as a correct record the minutes of the meeting of the Committee held on 21 December 2021 and to authorise the Chairman to sign them.

5 APPLICATIONS FOR DECISION (Pages 3 - 6)

Report attached

6 P1013.21 - HARRIS ACADEMY RAINHAM, LAMBS LANE SOUTH (Pages 7 - 32)

Report attached

Zena Smith
Democratic and Election Services
Manager

**MINUTES OF A MEETING OF THE
STRATEGIC PLANNING COMMITTEE
Hybrid Meeting
21 December 2021 (7.15 - 8.10 pm)**

Present:

COUNCILLORS 8

Conservative Group	Dilip Patel (Chairman), Timothy Ryan (Vice-Chair), Ray Best and Maggie Themistocli
Residents' Group	Reg Whitney
Upminster & Cranham Residents' Group	Linda Hawthorn + attended remotely
Independent Residents Group	Graham Williamson
Labour Group	Keith Darvill

All decisions were taken with no votes against.

The Chairman reminded Members of the action to be taken in an emergency.

11 DISCLOSURE OF INTERESTS

There were no disclosures of interest.

12 MINUTES

The minutes of the meeting held on 4 November 2021 were agreed as a correct record and signed by the Chairman.

**13 P0851.20 - THE VERVE APARTMENTS, MERCURY GARDENS,
ROMFORD**

The report before the Committee detailed an application to vary Condition 2 of planning permission J0026.15 dated 28 October 2015 to allow a reduction in parking spaces from 60 to 27.

With its agreement Councillor Joshua Chapman addressed the Committee as a Ward Councillor.

The report recommended that planning permission be refused.

The Committee considered the report and **RESOLVED NOT TO GRANT PLANNING PERMISSION** on the grounds of that:

There was no effective control or mechanism to prevent the existing or the future occupiers of the Verve Apartments (ground, first, second and the third floor) from obtaining parking permits in the Residential Control Parking Zone and as a result of the loss of 33 car parking spaces which were meant to be available to them, there would be a significantly increased risk of on-street car parking demand and the over-spill of the cars onto the existing heavily park roads resulting in a detrimental impact upon the safe and free flow of traffic in the control parking zone and consequential detriment to the amenities of the existing residents, thereby the proposal fails to satisfactorily mitigate the parking impacts of the development, contrary to the provisions of Policy 24 of the local plan (2016-2031) adopted 2021.

The vote for the motion to refuse planning permission was carried by 7 votes.

Chairman

Agenda Item 5

Applications for Decision

Introduction

1. In this part of the agenda are reports on planning applications for determination by the committee.
2. Although the reports are set out in order on the agenda, the Chair may reorder the agenda on the night. Therefore, if you wish to be present for a specific application, you need to be at the meeting from the beginning.
3. The following information and advice only applies to reports in this part of the agenda.

Advice to Members

Material planning considerations

4. The Committee is required to consider planning applications against the development plan and other material planning considerations.
5. The development plan for Havering comprises the following documents:
 - London Plan Adopted March 2021
 - Core Strategy and Development Control Policies (2008)
 - Site Allocations (2008)
 - Romford Area Action Plan (2008)
 - Joint Waste Development Plan (2012)
6. Decisions must be taken in accordance with section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004. Section 70(2) of the Town and Country Planning Act 1990 requires the Committee to have regard to the provisions of the Development Plan, so far as material to the application; any local finance considerations, so far as material to the application; and any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Committee to make its determination in accordance with the Development Plan unless material planning considerations support a different decision being taken.
7. Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects listed buildings or their settings, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest it possesses.
8. Under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development

which affects a conservation area, the local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.

9. Under Section 197 of the Town and Country Planning Act 1990, in considering whether to grant planning permission for any development, the local planning authority must ensure, whenever it is appropriate, that adequate provision is made, by the imposition of conditions, for the preservation or planting of trees.
10. In accordance with Article 35 of the Development Management Procedure Order 2015, Members are invited to agree the recommendations set out in the reports, which have been made based on the analysis of the scheme set out in each report. This analysis has been undertaken on the balance of the policies and any other material considerations set out in the individual reports.

Non-material considerations

11. Members are reminded that other areas of legislation cover many aspects of the development process and therefore do not need to be considered as part of determining a planning application. The most common examples are:
 - Building Regulations deal with structural integrity of buildings, the physical performance of buildings in terms of their consumption of energy, means of escape in case of fire, access to buildings by the Fire Brigade to fight fires etc.
 - Works within the highway are controlled by Highways Legislation.
 - Environmental Health covers a range of issues including public nuisance, food safety, licensing, pollution control etc.
 - Works on or close to the boundary are covered by the Party Wall Act.
 - Covenants and private rights over land are enforced separately from planning and should not be considered.

Local financial considerations

12. In accordance with Policy 6.5 of the London Plan (2015) the Mayor of London has introduced a London wide Community Infrastructure Levy (CIL) to fund CrossRail.
13. Other forms of necessary infrastructure (as defined in the CIL Regulations) and any mitigation of the development that is necessary will be secured through a section106 agreement. Where these are necessary, it will be explained and specified in the agenda reports.

Public speaking and running order

14. The Council's Constitution allows for public speaking on these items in accordance with the Constitution and the Chair's discretion.
15. The items on this part of the agenda will run as follows where there are registered public speakers:

- a. Officer introduction of the development
 - b. Registered Objector(s) speaking slot (3 minutes)
 - c. Responding Applicant speaking slot (3 minutes)
 - d. Ward Councillor(s) speaking slots (3 minutes)
 - e. Officer presentation of the material planning considerations
 - f. Committee questions and debate
 - g. Committee decision
16. The items on this part of the agenda will run as follows where there are no public speakers:
- a. Where requested by the Chairman, officer presentation of the main issues
 - b. Committee questions and debate
 - c. Committee decision


Late information

17. Any relevant material received since the publication of this part of the agenda, concerning items on it, will be reported to the Committee in the Update Report.

Recommendation

18. The Committee to take any decisions recommended in the attached report(s).

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 Havering LONDON BOROUGH	Strategic Planning Committee 6 January 2022
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Application Reference:

P1013.21

Location:Harris Academy Rainham
Lambs Lane South**Ward:**

Rainham & Wennington

Description:

Erection of part two and part three storey building to provide new sixth form building, with associated access and parking, following demolition of the existing swimming pool.

Case Officer:

Habib Neshat

Reason for Report to Committee:

The application is of strategic importance and has been subject to pre-application presentation to members of the Committee.

1 SUMMARY OF KEY REASONS FOR RECOMMENDATION

1.1 In principle the provision of additional education facilities for the Borough is supported and accords with planning policies in the NPPF, London Plan and the recently adopted Local Plan.

1.2 The site is designated within the Green Belt where restrictive criteria applies for the development of the land. In this case there are several important factors which would justify the provision of the educational establishment in this location which would outweigh any identified harm to the Green Belt as follows;

- The building would replace an existing swimming pool on site and hence the development would be on a previously developed land.
- The site is within the envelope of the built up area which would limit the impact on the openness of the Green Belt. The proposed academy would be an extension of the existing educational establishment benefiting from the existing facilities on the site.

- It is demonstrated that there is a significant need for a 6th form college in this part of the borough, avoiding the need for local students to travel far to attend post school education. (The nearest 6th form college at Wingletye Road – 43min bus and walk away.
 - The proposal would provide a significant community benefit as well as short and long term employment opportunity.
 - There is a significant and wide local community support for the proposed educational facility with particular reference to those whose children are already attending the adjacent secondary school.
- 1.3 The scheme provides, reasonable degree of amenity space for the future students on the site. The scale and the design of the building has also responded to the sites context by creating a building of balanced proportion using appropriate materials.
- 1.4 Through careful siting and orientation, the scheme has sought to ensure its impact upon the amenities of the nearest residential dwellings, in terms of loss of outlook and privacy of the existing occupiers would be minimised.
- 1.5 The highways officers, the traffic control officers, the council's school's travel plan coordinator as well as the advice from Transport for London (TfL) have assisted with various mitigating measures to minimise the impact of the development upon the safe and free flow of the surrounding highway network.
- 1.6 The proposal would comply with key objective of the planning policies by providing educational facilities in this part of the borough.
- 1.7 Subject to conditions, with respect to sustainable measures and the prior completion of a legal agreement to provide for the road improvement and other mitigating measures the proposed scheme is considered acceptable.

2 Recommendation

- 2.1 That the Committee resolve to grant planning permission subject to the prior completion of an agreement pursuant to Section 106 of the Town and Country planning Act 1990 (as amended) and all other enabling powers based on the following heads of terms and planning conditions;

The following Heads of Terms to be included in the legal agreement;

1. To provide training and recruitment scheme for the local workforce during the construction period, in accordance with the provisions of Policy 22 of the Havering Local Plan (2016- 2031)
2. Financial payment to the sum of £86,860 towards the Council's carbon offset fund.

3. Financial payment to the sum of £320,000 with respect to highway improvements within the vicinity of the site
4. Financial contribution to the sum of £20,000 with respect to consultation and implementation of Control Parking within the surrounding area
5. The developer / applicant to pay the Council's reasonable legal cost associated with the draft of the Legal Agreement prior to the competition of the agreement.
6. All contribution sums shall include interest to the due date of expenditure and all contribution sums to be subject to indexation from the date of completion of the Section 106 agreement to the date of receipt by the Council.
7. The drawing up of comprehensive Travel Plan across the entire site.
8. The sum of £500 with respect to the monitoring of the legal agreement

Conditions

1. Time limit
2. In accordance with plans
3. Materials samples
4. Landscaping to be provided (as per details submitted)
5. Boundary Treatment details
7. External Lighting details
9. Cycle Storage details, then provided and retained
10. Hours of construction, 8am to 6pm Mon-Fri; 8am to 1pm Sat
11. Construction Management plan
12. Wheel Wash Facilities
13. Measures to be implemented in accordance to whole life cycle plan
14. Delivery and Servicing Management Plan
15. Measures to be implemented in accordance to energy statement
16. Measures to be implemented in accordance to ecology report.
17. Materials for hardsurfacing
18. Car parking to be made available and retained
19. Wheelchair Adaptable throughout the building
20. Measures to be implemented in accordance to circular economy
21. Mitigate impact of noise from plant and machinery upon the amenities of the nearest residential accommodation
22. Mitigate impact of noise from road traffic upon the quality of the environment within the building
23. Surface water drainage strategy.
24. Cycle storage and management plan
25. Passive and active provision of electric vehicle charging points
26. Secure by design certificate

- 27. Details of the access, boundary treatment in relation to visibility splay
- 28. Levels, gradients across all access routes,
- 30. Details of the pathways, pedestrian access within and to site, including any ramp (detailing the gradient and turning areas, appropriate marking for the visually impaired and appropriate surfacing material (non-slip)
- 31. Photovoltaic Panel Details
- 32. Road Safety Audit (stage 3) required
- 33. Water efficiency

Informatives

- 1. NPPF positive and proactive
- 2. Secure by design
- 3. Planning obligations
- 4. Changes to the public highway
- 5. Highway approval required – s.278 will be required also RSA stag
- 6. Temporary use of the public highway

- 2.4 That, if by 1st April 2022 the legal agreement has not been completed, the assistant Director of Planning has delegated authority to refuse planning permission or agree an extension to the decision date.

3. Proposal and location details

- 3.1 Full planning application has been submitted for the erection of a part two part three storey building incorporating an L-shape layout to provide a new 400-place sixth form college for pupils aged 16-19 on the existing site of Harris Academy, with the floor space of 4000sqm.
- 3.2 The disused swimming pool building would be demolished to make way for the new school.
- 3.3 The proposal includes the provision of a new vehicular access from Wennington Road to on site car-parking for. 2 disabled and 4 visitor spaces.
- 3.4 Social/amenity spaces for the students are proposed on the south side of the sit and the west and north west of the site adjacent to the dining hall within the proposed college building.
- 3.5 Cycle storage spaces are proposed between the existing sports hall and the proposed college, to the front of the school near its entrance and further to the north of the site.
- 3.6 The electric sub-station would be relocated to the south side of the site adjacent to Wennington Road. There would be a new vehicular access to the substation, for maintenance purposes only.

4. Site and Surroundings

- 4.1 This is an existing established school site. The current buildings include the school buildings, playing field, hard surface playing grounds, a covered sports hall and a disused swimming pool building as well as small substation. The site is located at the edge of the built up area of Rainham.
- 4.2 The wider site extends south of Lambs Lane South and east of Wennington Road. The south-western corner of the site sits adjacent to the Brady Primary School, which also fronts Wennington Road. The wider school site adjoins open space to the south and east.
- 4.3 The proposed development relates to western part of the overall site an area of 0.48-hectares currently occupied by the former swimming pool facility which forms part of the Chafford Sports Complex. The swimming pool closed in June 2019.
- 4.4 The Brady primary school separates the application site from agricultural land and buildings to the south. To the east the existing school buildings separate the site from the Academy's open playing fields. There are residential buildings to the north of the site. To the west of the site on the opposite side of Wennington Road are two storey residential houses some 27m away from the site boundary.
- 4.5 Apart from the schools and small number of local shops the area is generally suburban residential development with low rise detached and semi-detached housing.
- 4.6 Currently the vehicular access for the services and the car parking spaces are all from Lambs Lane South, as is the pedestrian and cycle access.
- 4.7 The site is located in the designated Green Belt. There is no other designation.

5. Planning History

- 5.1 There is no relevant planning history. However, there has been pre-application discussion with the officers since around 2018. Initial discussions were in relation to a proposal for building to the open area to the north of the site on the playing fields. However, this approach changed when the existing swimming pool building became redundant.

6 Consultation at pre application stage;

- 6.1 The applicant has consulted the local community on these proposals as part of the pre-application process.

- 6.2 The programme of public engagement has been multi-faceted and consisted of engagement with residents through the online portal, through the distribution of printed materials, and through the public exhibition with residents and stakeholders.
- 6.3 As a result of the engagement members of the public have raised their concerns with respect to noise and traffic issues, but a significant number of the members of the local community provided strong support for the provision of the 6th form college.

Quality Review Panel

- 6.4 The scheme has been subject to examination by the Quality Review Panel on 16 March 2020 (video conferencing). A summary of the comments received from the Panel members is below with a response to the comments:

Comments by QRP	Response and revision to the comments
This an appropriate site for a sixth form college, with both good access to Rainham Station and the potential to integrate into a wider educational campus.	It is noted and agreed the suitability of this location for the proposed 6 th form College
Any scheme should embrace the entire site, and should not be looked as a standalone project, currently there is poor integration with the existing school; a masterplan for the whole campus, showing how the new sixth form is connected within it and identifying how the proposed connections will operate beyond the red line of the sixth form site itself.	There have been a number of revision since to ensure there is better integration with the existing school.
The scale of the building is appropriate the set back of the elevation fronting to Wennington Road is too apologetic for a civic building in this location. Greater presence on the street could be achieved by relocating the social spaces, including the dining room, to the front of the building and creating a stronger visual connection between the street and the main entrance.	The applicant has taken a different approach seeking to minimise the impact of the development, which is supported by officers

Better internal and external circulation integration should be achieved; concern over narrow corridors with poor natural light.	The school would be built in accordance to the minimum standards set out by the educational framework
Layout compromises the quality of the public realm, vehicle movement and car parking further undermines the quality and quantity of the available public realm; panel would like to see further consideration given to shared access with the wider school campus in order to free up amenity space within the scheme.	To a greater extent this has been achieved by the reduction in car parking spaces, allowing for greater amenity space at the front of the site.
The elevations are perhaps too rigidly uniform. The metal cladding to the elevations feels industrial and utilitarian. The main entrance to the school is effectively celebrated, but visually disconnected from Wennington Road	There have been improvement over the design, reduced use of colour, improved main entrance and, use of brick and deeper reveals to window.
Do not demonstrate sustainable quality. Measures should include; air-source heat pumps should be a critical component of the scheme's energy strategy, rationale for the number and location of the proposed PV panels should be clarified and solar shading. More detail re ventilation and Water strategy, Green or living roofs should be explored, enhancing the schemes contribution to biodiversity.	Sustainability has improved by incorporating PV panels and green roof with increased area of amenity space through reduced parking
Life-cycle assessment of the scheme's carbon impact, including the embodied carbon of the proposed materials and those of the demolished swimming pool. The potential for reusing materials should be fully explored	Additional information has been provided in the form of a life cycle carbon assessment and circular economy assessment.

Strategic Planning Committee

- 6.5 The early proposals were presented to the Strategic Planning Committee on 22 April 2021 The committee's response to the scheme was as follows;

Concern whether there would be a need for a 6th Form College and the curriculum it would offer.	<p>Education department has confirmed that there would be a need for a 6th form college in this location</p> <p>The curriculum will be largely centred on A levels and will include the following subjects: maths, further Maths, Biology, Chemistry, Physics, English Literature, History, geography, Religious Studies, Government and Politics, Sociology, Psychology, Business studies, Economics, PE, Art, Music, theatre Studies, MFL (German, Spanish and French) and Computer science. The school will also offer CTEC's in Business studies, Health and Social care and sport.</p>
Concern with the proposed location or siting of the building within the site	The other locations within the site not acceptable as they would be on playing fields where their loss would be opposed by Sport England and would have a greater impact upon the openness of the green belt
Concern with respect to overspill of staff parking in the nearby area as well as the impact upon the highways in particular with reference to the introduction of a vehicular entrance from Wennington Road and the over spill of cars onto adjacent roads	Through a variety of mitigating measures; pavement and road improvement, improved road marking, potential controlled parking and a robust travel plan would ensure the impact of the proposed college upon the safe and free flow of traffic would be minimised. Full detail in body of the report
Antisocial behaviour with particular reference to the poor layout of the proposed school compelling the student to hang around outside the school premises	The layout has improved since the original design to provide substantially increased student amenity space.

Concern with respect to sustainability credentials of the scheme	Sustainability has improved by incorporating PV panels and green roof
Concern with respect to design	There have been improvement over the design, reduced use of colour, improved main entrance and, use of brick and deeper reveals to window.

Consultation Post Submission of the application;

- 6.6 A total of 190 letters were sent to the neighbouring properties. A site notice was displayed at the site publicising the application proposals.
- 6.7 There has been 150 comments in support of the scheme and 8 objections.
- 6.8 A summary of the areas of **objections** are as follows:
- Increase in traffic,
 - Objection to proposed entrance from Wennington Road
 - Objection to use of the entrance from Lambs Lane South
 - Increase in antisocial behaviour
 - Increase in noise and disturbance
 - The development being inappropriate on Green Belt Site (2)
 - The traffic and noise in Wennington Road and Lambs Lane is already too high our air quality and general quality of life will be dramatically affected by the amount of students attending the college.
 - Brady Primary School: the proposed 6th form would serve the community well as there is no such provision that is easily accessible for our pupils in the local area. However, there is a concern with respect to the proposed vehicular entrance from Wennington Road.
- 6.9 Summary of **support** for the proposed academy:
- There is a need for a 6th form college in the area. Harris Academy is a great academy and by having a sixth form in the area will be very beneficial.
 - This will provide a solid continual education offer for our children and, role models for the current secondary school.
 - Rainham has educationally been a neglected part of Havering for far too long. At present, those wishing to further their education need to travel to Hornchurch or Chafford Hundred, in some cases children need to take 3 buses to reach their college.
 - The college will encourage young people to stay in education for another couple of years, making this facility not only highly desirable, but essential.
 - The success of pupils at Harris Academy will be significantly improved if they are able to continue their further education with familiar teachers, peers and surroundings

- The numbers of students wishing to stay on has increased in recent decades, there exists a lack of variety of provision. The remaining schools that have sixth forms are selective, or have a bias towards, religious ethos or gender and are largely oversubscribed.
- The school would also be in a better position to recruit staff wishing to include Key Stage 5 teaching in their repertoire. Harris Academy Rainham is ideally suited to become a sixth form provider, as it is part of a large Federation that has a successful track record.
- The school has taken remarkable steps to turn itself around. Focusing on all types of student, whether academic, sporting, artistic or special needs. It actively encourages the children to contribute to the community. It's a great shame that students cannot currently continue their education there and instead travel great distances.

6.10 Internal and External Consultation:

The following responses were received from statutory and London Borough of Havering consultees:

Greater London Authority

- 6.11 Given the scale of the proposed development the application has been referred to GLA which has provided their Stage One Report. The following comments were made;
- Concern with respect to the loss of community facility and sports facility which has not been fully clarified.
 - The full impact upon the openness of the green belt has not be fully assessed and that 'very special circumstances' has not be demonstrated.
 - Does not object to massing, scale but is concerned with the layout in particular reference to the location of the proposed car park and the lack of amenity space for students.
 - Requires the submission of a fire Statement
 - Requires a robust Active Travel Zone assessment.
 - Requires a stage one Road Safety Audit.
 - Concern with the location of the proposed car parking
 - Requirement to provide mitigating measures to avoid excessive overspill parking and to promote alternative modes of transport. Improve upon cycle parking and the travel plan
 - Concern with respect to failing to comply with London Plan policy with respect to Circular Economy
 - Concern with respect to failing to comply with London Plan policy with respect to Whole Life Carbon
 - Concern with insufficient information with respect to Urban Greening Factor
 - Concern with insufficient information with respect to Energy Efficiency Strategy
 - Concern with failing to address the issues with respect to sustainable drainage and flood risk, landscaping, trees, ecology and biodiversity.

Transport for London (TfL)

- 6.12 The TfL made the comments with respect to the latest proposal as follows;

- The reduction of car parking spaces is welcomed
- There is no need for the turning head – as all the servicing would be carried out from the existing school premises.
- the doubling up of the use of the area for the turning head would reduce the usability of this public realm and the balance of space given to people to dwell, walk and cycle.
- The visitor parking and disabled person parking currently available in the adjoining secondary school site could also be utilised for this site, so that there would be no need for vehicular entrance from Wennington Road.
- The removal of vehicular entrance would reduce the potential hazard with the future users of the site and those attending the adjacent primary school, which would be in line with the Mayor's Vision Zero approach, which aims to eliminate all deaths and serious injuries from London's roads.
- Concerned that the pupils and parents of the nearby Brady Primary School will be crossing the proposed vehicular access to get to the school. This primary school has nursery and reception classes. The children in nursery have half days, as well as breakfast and after school clubs, meaning that these pupils will be leaving and arriving to the school at different times to Harris Academy pupils. If the sixth form pupils are allowed to enter and exit during the school day, then this access poses a safety risk to pupils and parents from both schools, who will be potentially crossing the vehicle access at all times of day, further supporting the suggested removal of this access.

Internal consultee

The following consultees have commented as part of the

6.13 Children Services –

- There is a need for the proposed educational facilities in this location.

LBH Highway officers ;

- Requires financial contribution to the improvement of the roads and pavements in the surrounding area.
- There remains a concern with respect to the vehicular entrance to the site from Wennington Road. In particular the Road Safety Audit (RSA) has failed to address the safety of children and parents crossing over the proposed vehicular entrance. There could be potential conflict between the pedestrians and the vehicles exiting from the college in particular with reference to visibility of the traffic in Wennington Road.
- Further there is a concern with the over spill of cars onto adjoining residential streets. Although the impact might not be felt immediately, there is a need to safeguard for the potential increase in the future and the possible implementation of additional parking control which would help to mitigate this impact.

Transport Policy Team.

6.14 Supporting document should be provided by the Department for Education that mandates the maintenance of active and accredited travel plans that effectively, proactively and successfully promote active and sustainable travel for the Secondary School and Sixth Form including resource and funding for the duration of occupation of both sites.

6.16 Also recommend that staff and visitor car parking spaces to be combined with the Secondary School site in order to provide a safe and suitable access to the site for all users and to give priority to pedestrian and cycle movements. This would obviate the need for a vehicular entrance on Wennington Road.

Any permission should be subject to conditions and a robust Travel Plan. Any approval should be conditioned to include details of a travel plan for both college and school and travel plan coordinator; contributions to initiatives and measures to support and delivery an active travel plan for the lifetime of the use and accredited travel plan ; shared access for delivery and servicing from Lambs Lane South.

Environmental Health –

6.17 Need to demonstrate the environment within the building (light, noise and temperature) would be comfortable.

7. Material Planning Considerations;

The main issues to be considered;

1. The principle of the development, in particular with respect to the loss of sports facilities and introduction of an educational use.
2. Impact on the green belt,
 - whether the proposal would be inappropriate development in the Green Belt for the purposes of the National Planning Policy Framework (the Framework) and development plan policy;
 - the effect on the openness of the Green Belt and the character and appearance of the surrounding area; and
 - if the proposal would be inappropriate development, whether the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations, so as to amount to the very special circumstances necessary to justify it.
3. Whether the proposal would have an acceptable impact upon the highways condition through incorporating mitigating measures, include active travel

plan strategy, the quantum of car parking, cycle storage, general access to the site / building pedestrian and vehicular

4. Whether the proposal would satisfactorily integrate with the existing context including impact on the streetscene
5. Whether the proposal would have an acceptable impact upon the amenities of the adjoining occupiers.
6. Whether the proposal would provide acceptable quality of educational facility including the provision of sufficient external amenity space for the 400 pupils; the quality of the internal space, particularly social/communal areas and circulation
7. Whether the proposal would provide sustainable building incorporating energy efficiency building, particularly with respect to natural ventilation, natural light and solar shading to minimise overheating to classrooms, circular economy, life carbon cycle, urban greening factor, ecology, energy efficiency, Circular economy, Whole Life Carbon and the flood issues.

The principle of development;

- 7.1 In principle the provision of improved and additional education facilities for the Borough is supported and accords with planning policies in the NPPF, London Plan and the adopted Local Plan. To address the GLA concern with respect to the loss of the existing swimming pool, it is noted that the swimming pool closed in 2019 due to its poor condition and state of repair. Furthermore the old swimming has been replaced with a modern facility in the local area. It is recognised that there is an identified need for such a facility within this part of the borough which is currently missing.

The Green Belt issues;

- 7.2 National guidance in the form of the NPPF and the policies of the London Plan and the Havering Local Plan all seek to protect the Green Belt within which this site lies. The Framework (paragraph 145) makes clear that the construction of new buildings in the Green Belt should be regarded as inappropriate, with a small number of exceptions as follows;
 - a) buildings for agriculture and forestry;
 - b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

7.3 With respect to the above criteria, to some extent the proposal would comply with categories, d and g. The proposed building would replace an existing building and hence it is considered as a previously developed land. Further, the proposed building would be within the envelope of the built up part of the site thus limiting its impact on openness. However, the replacement building is larger than the building it would replace and hence, the impact upon the openness does need to be carefully considered and it is therefore, necessary to demonstrate whether or not there are 'very special circumstances' that would outweigh the harm caused to the Green Belt.

7.4 There is no particular criteria set to establish what would amount to a "very special circumstance". In this case there are a combination of factors which together are considered to constitute "very special circumstance".

- The applicants have put forward their claim that there are 'very special circumstances' in this instance which outweigh the harm to the Green Belt. Firstly, they state that overall there is an identified need for such a further education facility within this part of the Borough.
- Secondly, in the supporting information to the application this indicates that there are no alternative suitable sites for the provision of such a facility within the local area. The Council's Education Service have added their weight to this position to confirm that this is the situation that there are no 6th form college facility in this part of the borough, and that such a facility is much needed. In addition, that an extensive search of alternative sites has shown

that there are not any other suitable available sites for this facility within the Borough.

In addition, to the above VSCs, such a facility would also add a significant benefit to pupils in the local area being able to go through from secondary and onto 6th form college in their immediate local area. Thus the proposals would provide an important opportunity for synergy between the existing secondary and the proposed 6th form college, creating a most valuable asset for the borough and local community. Creating the opportunity of sharing facilities, services and staff to the betterment of the students at both establishments.

This would also achieve a much more sustainable situation than at present with local children need to take up to 3 buses to get to the nearest existing 6th form colleges.

- Therefore, the above factors in combination with the brownfield and previously developed status of the site, in a location within a build-up area, is considered to amount to very special circumstances outweighing any harm that the development would cause to the openness of the Green Belt.

7.5 In accordance to the GLA's advice the applicant has provided further views of the site from various public vantage viewpoints within the Green Belt which demonstrate the impact upon the openness of the Green Belt would be largely mitigated by the existing school buildings and structures and tree coverage surrounding the application site.

7.6 In terms of the effect on character and appearance, the application site is located within an existing educational establishment, incorporating large buildings, associated car parking and vehicular access. Therefore, given the context the proposed building would be in keeping with the character of the area. However, issues of design, layout and character will be considered below in this report.

Impact upon highways condition

7.7 The impact of the proposals on the adjoining highways network is an important consideration. The existing education facilities already create congestion on the roads within the vicinity of the site, in particular during drop-off and pick-ups. The other problem relates to the over-spill of cars associated with the use of the education establishments onto the surrounding roads.

- 7.8 It is anticipated that the proposed academy would bring about its own additional congestion and overspill onto adjoining roads, unless appropriate mitigation measures are adopted to address this.
- 7.9 The NPPF, London Plan as well as the adopted local policies, all seek to combat congestion on the roads, reduce air pollution, reduce traffic hazards, and bring about a healthier lifestyle.
- 7.10 The NPPF recognises that sustainable transport has an important role to play in facilitating sustainable development but also contributing to wider health objectives. In particular it offers encouragement to developments which support reductions in greenhouse gas emissions and those which reduce congestion.
- 7.11 The NPPF also outlines that developments which generate significant vehicle movements should be located where the need to travel will be minimised and the use of sustainable transport options can be maximised. It is also expected that new development will not give rise to the creation conflicts between vehicular traffic and pedestrians.
- 7.12 Policies T1 - T6 of the London Plan seek to ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network. The London plan seeks to ensure a balance is struck to prevent excessive car parking provision that can undermine cycling, walking and public transport use and through the use of well-considered travel plans aim to reduce reliance on private means of transport.
- 7.13 This is also echoed by policy 23 of the adopted Local Plan which indicates proposals will not be supported where they would have an unacceptable adverse impact on the capacity or environment of the highway network.
- 7.14 LB Havering has a Local Implementation Plan (LIP) which sets out how the borough will deliver the Mayor's Transport Strategy at a local level. The Plan includes a series of objectives to;
- “enable healthier lifestyles through the provision of active and sustainable travel choices to residents and visitors in Havering and to make Havering a better place to walk and cycle around”*
- “to deliver “vision zero” in Havering by 2041 through reducing casualties of all road users on borough roads especially in the vicinity of schools and KSI hotpots”.*
- 7.15 The Mayor's Transport Strategy (MTS) has an overall modal shift target of 80% of Londoners travelling by foot, bike or public transport by 2041. Havering's LIP has a targets for 65% of its residents to be travelling by

foot, bike or public transport by 2041. Havering's LIP also contains a target of 42% of residents doing at least 2x10 minutes of active travel a day (or a single block or 20 minutes or more) by 2041

- 7.16 The Council considers tackling air pollution very important and in recent years we have adopted an Air Quality Action Plan which sets out the actions Havering will take to improve local air quality. The AQAP includes a number of actions around sustainable travel to reduce air pollution including the work we do to encourage people to travel to school by foot, cycle or public transport.
- 7.17 In addition, recently the boroughs Climate Change Action Plan was approved at Full Council. This document sets out how Havering plans to become carbon neutral by 2040. The document includes a number of actions to achieve this aim including improving air quality, through cycling, walking and electric vehicles. Further details on the Havering Climate Change Action Plan can be found [here](#).
- 7.18 The fundamental strategy to be adopted would need to be the reduction in the number of staff, visitors and students using the private motor cars coming to and from the academy.
- 7.19 Currently the main vehicular access to the wider site is from Lambs Lane South, for car parking and servicing. During the consideration of the proposals officers had suggested that any additional parking required should be accommodated within the existing school site utilising existing space around the existing entrance from Lambs Lane South, however, the applicant has advised that this is not possible, that parking can only be accommodated within the application site area and not the wider school site.
- 7.20 The proposed servicing for the 6th form college would continue to be carried out from this existing vehicular access and directly from within the existing school site. A new vehicular access onto Wennington Road is proposed, however, this would only serve visitors and disabled parking for the proposed college, with a total of only six spaces. This amendment to the scheme to significantly reduce the level of parking and servicing utilising this entrance would ensure that potential conflict with pedestrians and cyclists arriving / leaving the college entrance on Wennington Road would be substantially reduced. In addition, this would seek to address concerns of the Council and TfL with this new access point in respect to potential conflict with parents and children arriving and leaving the adjoining Brady Primary School.
- 7.21 Adjacent to the proposed visitor and disabled parking bays the applicants have proposed a 'grasscrete' turning area, in order to demonstrate to their funders should the site no longer be able to be serviced from the existing

school in the future, that it could be serviced from Wennington Road. However, should this situation arise the applicant would first need to obtain permission from the Council to vary the condition that would be attached to any permission requiring servicing of the college to only be from the existing school site.

- 7.22 These amendments to the level of parking and servicing within the site were considered to be appropriate in line with the mayor's modal shift in transport away from the private car, and encouraging walking and cycling and the use of public transport. These amendments now make the access and servicing arrangement for the site acceptable and address the significant concerns raised by the QRP Panel, the Council's highways officers, the GLA and TfL in this regard.
- 7.23 The poor condition of the surrounding roads together with congestion are largely attributed to the pressure from the traffic associated with the schools. It is considered that there would be a potential increase in additional pressure from the proposed academy which if not resolved adequately, there would be significant adverse impact upon the highway condition. For this reason the highways officers have required significant improvements to the roads and the pavements within the vicinity of the site.
- 7.24 The proposed upgrading would include the resurfacing of the roads and providing enhanced pavements for walking and vehicular parking as well as upgrading of road / traffic markings. The estimated cost for the road and pavement improvement would be in region of £320,000 which would be paid for by the developer. It is considered the proposed strategy would result in significant reduction of unofficial parking and the improvement to the road safety and free flow of traffic.
- 7.25 The highways officers have also considered that there may be a need for further restriction in car parking for the surrounding roads to prevent over-spill and that there may be requirement for the introduction of a Residential Control Parking Zone (CPZ). The applicant has agreed to pay for the cost of the consultation with the local residents and of implementing a CPZ scheme within the surrounding roads. This means that initially the parking control team would seek views of the local resident within a year of the opening of the college, and if agreed by residents the council would then implement the CPZ scheme.
- 7.26 In addition to these measure TfL and the Council's Travel Plan Coordinator have advised that the development would need to be supported by a robust and effective Travel Plan for the college and adjoining schools in order to adequately address concerns with parking and traffic issues.

- 7.27 Principally, the focus of the travel plan would focus on encouraging people to use sustainable forms of travel to reach the site. The strategy would have to be conveyed to staff, pupils and other visitors.
- 7.28 Some aspect of the travel plan would relate to the physical facilities to be provided and retained during the course of the life of the college in operation. The physical facilities would include the provision of separate secure cycle storage facilities for the staff and students, the provision of separate showers, changing room and locker facilities for student and the staff. Apart from combining of the disabled WCs and staff changing room, all other provision has been indicated with respect to the current scheme.

The impact upon the amenities of the adjoining occupiers;

- 8.1 Given the separation distances between the college building and the nearest residential properties to the west on Wennington Road and the modest scale of the proposed building, the proposal would not result in any significant loss of daylight, sunlight or outlook to these residential dwellings.
- 8.2 In terms of the loss of privacy, the proposed building would be over 14m from the boundaries of these dwellings and over 30m from the façade of their facades. Therefore the proposal would not be likely to result in significant degree of overlooking onto the neighbouring buildings. The other nearest property is to the north no.213 Wennington Road, given the orientation of the property which looks eastwards to the rear away from the application site, the rear garden boundary being some 23m away from the northern flank elevation of the new building and the rear elevation of the house some 40m away, the proposals would not result in any significant loss of amenity to these occupiers.
- 8.3 Noise assessment with respect to plant and machinery have been submitted. It is explained that after assessing the proposed plant to the appropriate standards, the plant noise is acceptable for both daytime and night time period as well as the London Ambient Noise Strategy and indicates the proposal would not have an adverse impact upon the amenities through noise.
- 8.4 There is no study with respect to the impact of noise from the operation of school upon the amenities of the adjoining occupiers. However, given the location of the nearby schools it is unlikely that the proposal could result in significant noise level to the adjoining occupiers.
- 8.5 Further, there is no noise impact assessment to explain the existing site conditions in terms of noise from the traffic and how they might impact upon the proposed development, and any mitigation measures needing to

be incorporated through design and construction, however, this is not considered to be significant and thus can be dealt with by way of condition

Design Considerations

- 9.1 The scale, design and layout of the proposed building has been subject to significant degree of the negotiation with the applicant. The original design and layout was criticised by the QRP with the proposed building for having a rather industrial appearance.
- 9.2 The built environment within the immediate vicinity comprises generally two storey building in combination with the buildings associated with the educational uses.
- 9.3 In particular the school buildings including the disused swimming pool have a dominant appearance. The proposed building in terms of its configuration, siting, bulk, scale, and design would add a new block to the area.
- 9.4 The building would be three storey, but it would incorporate a two storey element near the street to soften its impact. The proposed layout is in an L-shape form, with the longer arm being set well back from the street.
- 9.5 One of the main concerns raised by officers, QRP, SPC and the GLA related to the layout which originally included a considerable area of car parking which dominated the views of the front of the college building having an adverse impact of the visual amenity of the site.
- 9.6 The applicant has subsequently revised the layout of the scheme to address this concern. The original car park has been significantly reduced in size and the areas associated with soft landscaping and amenity space for the students has increased. The scheme therefore has now overcome the significant concerns with respect to the poor amenity space for the future students.
- 9.7 Further amendments have resulted in better articulation of the building with rearrangement of the fenestration, reduction in the use of coloured panels, more appropriate materials and recessed fenestration has improved the appearance of the building. The use of brick at the ground floor with vertical brick columns extending to upper floors has significantly improved the appearance of the building.
- 9.8 The school internal spaces have been designed in accordance to the educational standards.
- 9.9 In summary the proposal has improved through the pre-application process and the applicant has been responsive to concerns raised. It is

considered that the revised scheme, in terms of bulk, scale, massing and configuration would respond well to the surrounding context.

- 9.10 It is considered that the proposal in terms of its design and massing would have an acceptable impact upon the character of the area.

Energy Strategy

- 10.1 The energy statement was one of the issues raised by GLA. A Sustainability Statement has now been prepared to explain how the proposal has considered sustainability within its design. The submitted revised Energy Statement demonstrating additional mitigating measures through the increase in the use of PVs to achieve 15% carbon savings from energy efficiency measures has now been achieved.
- 10.2 The overall reduction in CO2 emissions for the development albeit there would be a shortfall to meet the target, attracting the contribution of £86,860 (based on the rate of £95/tCO2/year for a period of 30 years) which would be secured through legal agreement.
- 10.3 As requested by the GLA's carbon emission reporting spreadsheet has also been included with the report.
- 10.4 The applicant has now provided a revised Energy Statement which would incorporate addition PV panelling as well as green roofs which demonstrates compliance with London Plan policy SI2 and
- 10.5 The development proposal subject to contributions being sought would comply with Policy SI2 the London Plan.
- 10.6 Appropriate conditions are recommended to ensure that the sustainability credentials of the development are demonstrated throughout the detailed design, construction and operation stages.

Trees and Landscaping;

- 10.7 The existing open area is generally grassed. An Arboricultural Impact Assessment has been submitted with the application which states that the existing trees have only limited amenity value. Except for a loss of a semi mature tree at the proposed entrance to the college, the proposal would only result in the loss of trees of low or moderate amenity value. However, instead the detailed landscaping strategy indicates that the loss would be mitigated through the planting of new trees/shrub of a species and maturity to suit the site, which is considered to deliver improvement in amenity value in the long term.

- 10.8 The proposal would therefore accord with guidance from within policy and LBH's SPD on 'Protection of Trees' 2009 and policy 27 of the adopted plan.

Whole Life Cycle Carbon Assessment

- 10.9 The GLA Stage 1 letter also raised concern with respect to the inadequate consideration of the WLC of the scheme.
- 10.10 Whole life carbon encompasses all carbon emissions that arise as a result of the energy used in the construction, operation, maintenance and demolition phases of a building.
- 10.11 To get a true picture of a building's energy and carbon emissions impact, it is necessary to understand not only the operational and the embodied emissions on their own, but also the interrelationship between them. Whole Life Cycle (WLC) thinking, therefore, means considering these emissions together so as to optimise their relative and combined impacts and avoid the unintended consequences of assessing each in isolation. In summary, a low carbon building is one that optimises the use of resources both to build it and to use it over its lifetime.
- 10.12 In response to GLA concern, further information has been provided using initial analysis that uses the latest interim RIBA Stage 3 information. The analysis provides initial insight into the potential embodied environmental impact for the materials proposed for Harris Rainham 6th Form.
- 10.13 The first step to take in progressing the Harris Academy Rainham's ambition in to understanding the wider implications of its upstream and downstream carbon emissions (beyond that of energy use).
- 10.14 Instead of simply focusing on solely on Building Regulations requirements, the project will aim to understand its whole life cycle carbon impacts including emissions resulting from building materials, construction processes, operational energy and maintenance of the site, all the way through to deconstruction and re-use.
- 10.15 These include both operational energy use intensity and upfront embodied carbon targets, which together, will help shape the whole life carbon impact of the development.
- 10.16 The recommendation would include a condition which cover all aspect the development subject to an appropriate condition the proposed scheme would be in compliance with the London Plan Policy SI2.

Circular Economy

- 10.17 Concern was raised by the GLA in regards to this matter as it was not originally adequately addressed in the supporting documents. Circular Economy is defined in the London Plan Policy SI7 'Reducing waste and supporting the Circular Economy' as one where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste.
- 10.18 It is a new economic model that moves away from this current linear economy, where materials are mined, manufactured, used and thrown away, to a more circular economy where resources are kept in use and their value is retained.
- 10.19 For buildings, this means creating a regenerative built environment that prioritises retention and refurbishment over demolition and rebuilding. It means designing buildings that can be adapted, reconstructed and deconstructed to extend their life and that allow components and materials to be salvaged for reuse or recycling.
- 10.20 Designing buildings for a circular economy can increase their value by avoiding depreciation and can help to stave off obsolescence. It can even secure a positive residual value at end-of-life.
- 10.21 The applicant has now provided a Circular Economy Statement which indicates that as much as possible of the existing materials would be re-used.
- 10.22 A condition would be imposed to ensure the scheme is implemented in accordance to the proposed strategy to ensure the proposed development would comply with policy SI7 of London Plan.

Urban Greening –

- 10.23 This was another area of concern raised by the GLA.
- 10.24 The Urban Greening Factor is a tool to evaluate the quality and quantity of urban greening. It enables major developments to demonstrate how they have included urban greening as a fundamental element of site and building design in order to meet to meet London Plan Policy G5 Urban Greening.
- 10.25 The application site is rather constrained with limited opportunities to provide a significant increase in the quantum of greening. However, every attempt has been made to enhance the greening of the site. The enhancements when compared with the existing situation are as follows;
- Tree coverage at the site has increased from 54sq.m to 414sq.m
 - Ground cover planting has increased from 94sq.m to 217sq.m
 - Hedgerow planting has increased from 0sq.m to 81sq.m

- 10.26 The proposals have been amended to include 779sq.m of green roof which has enabled the Urban Greening score to be increased to 0.25.
- 10.27 All of these enhancements make a significant visual improvement when compared with the existing situation which comprises predominantly of amenity grassland.
- 10.28 The additional information provided demonstrate how the Urban Factor score has been calculated as requested in the GLA Stage 1 Report.
- 10.29 Subject to condition requiring the implementation of the scheme in accordance to the plans submitted, which would result in significant enhancement over the current situation, the proposal is considered acceptable.

Sustainable Drainage and Flood Risk

- 10.30 The GLA also raised concern with the Sustainable Urban Drainage Strategy. Further information has been provided which indicates that the area that was originally proposed to discharge at an unrestricted rate this has been re-routed to the main site soakaway.
- 10.31 In respect of the above ground SuDS the proposals now include a green roof which assists with the attenuation of rainwater. However, the application still fails to provide rainwater harvesting due to financial reason in particular with due to the increased lifetime maintenance and associated costs.
- 10.32 Subject to imposition of appropriate conditions, it is considered that the proposal would comply with policy SI3 of the London Plan.

Ecology and Biodiversity

- 10.33 The GLA found the originally submitted biodiversity proposals to be insufficient. Additional information has now been submitted. The information provided includes a study which evaluates the ecological value of the site and provided advice as how appropriate measure to be taken to safeguard the future ecological value of the site.
- 10.34 The submitted study suggests the current site has a low quality ecological value. Given the low ecological value, there proposal offers a range of measures including the provision of new areas of green roof, bird and bat boxes suitable for pipistrelles, house sparrow and swifts along with wildlife friendly landscaping including planting of native tree and shrubs which would allow opportunities for nesting birds to be attracted to the site. The study suggests, biodiversity net gain of 12.21% could be achieved.

10.35 Conditions are recommended for the completion of an Arboricultural Method Statement and a detailed landscape plan with supporting strategy, prepared by a qualified Landscape Architect as well as the following measures;

- Biodiversity enhancement measures to be incorporated into the landscaping scheme in order to maximise the ecological value of the site;
- Any excavations needing to be left over-night should be covered to prevent mammals becoming trapped

10.36 Subject to the above conditions, the proposal is considered in accordance with would be in compliance with the council's policies and the London Plan policy G6.

EQUALITIES AND DIVERSITY

11.1 Section 149 of the Equality Act 2010, which came into force on 5th April 2011, imposes important duties on public authorities in the exercise of their functions, including a duty to have regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

11.2 For the purposes of this obligation the term protected Characteristics includes: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

11.3 The proposed development comes forward within the setting of an existing educational establishment. The site is some distance away from the nearest residential unit and given the existing site context and uses, it is not considered that the development would unduly harm any particular groups protected by the above Act.

11.4 Therefore in recommending the application for approval, officers have had regard to the requirements of the aforementioned section and Act and have concluded that a decision to grant planning permission for this proposed development will comply with the Council's statutory duty under this important legislation.

11.5 In light of the above, the proposals are considered to be in accordance with national regional and local policy by establishing an inclusive design and providing an environment which is accessible to all.

Other Mitigation CIL

- 12.1 As an educational use the proposal would not be liable to Mayoral or Havering CIL Contributions.
- 12.2 Other financial contributions have been identified in respect to the heads of terms.

Conclusions

- 13.1 The scheme has addressed the concerns raised initially by all parties, through amending the layout, reducing parking provision, servicing to be only from the existing school site, improving the quality and quantity of the amenity space and the sustainable credentials of the environment of the site and the quality of the building.
- 13.2 The proposal would make an important contribution towards meeting the educational needs in the Borough and would make effective use of a sustainable site. The layout of the proposed development would provide an acceptable standard of amenity for the future students and there would not be a significant loss of amenity to neighbouring properties. The impact of the proposed development upon the openness of the Green Belt has carefully been assessed. It is considered that there is very special circumstances which would outweigh any harm to the openness of the Green Belt.
- 13.3 The design of the proposed building is acceptable and meets policy guidance. All other relevant policies and considerations have been taken into account.