



Application Reference:	P1129.21
Location:	ST EDWARD'S ACADEMY LONDON ROAD
Ward	BROOKLANDS
Description:	DEVELOPMENT OF A NEW SPECIAL EDUCATION NEEDS AND DISABILITY SCHOOL (SEND) COMPRISING DETACHED TWO STOREY SCHOOL BUILDING, ARTIFICIAL MULTI-USE GAMES AREA (MUGA), ASSOCIATED HARDSTANDING, PARKING, ACCESS AND LANDSCAPING
Case Officer:	RAPHAEL ADENEGAN
Reason for Report to Committee:	<ul style="list-style-type: none">• The application is within the categories which must be referred to the Mayor of London under the Town and Country Planning (Mayor of London) Order.

1 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 1.1 The key issues to consider include: the principle of development in context of the site's location within the Metropolitan Green Belt, the loss of playing field land, the design of the proposed development and its relationship to the character and appearance of the surrounding area, need for a SEND school, the impact on the amenity of neighbouring properties, the impact on parking and the highway, and considerations relating to ecology and biodiversity, air quality and noise impact, floodlighting, environmental sustainability, and drainage. The report will also give a detailed review of the proposed development as well as considering the potential impacts, in terms of Green Belt and any heritage asset which can be positive or negative, as addressed by the submitted supporting statements.
- 1.2 Officers consider the proposal to be acceptable, subject to no contrary direction from the Mayor for London and conditions.

2 RECOMMENDATION

2.1 That the Committee resolve to GRANT planning permission subject to:

1. agree the reasons for approval as set out in this report, and
2. refer this application to the Mayor of London (the GLA) as a Stage 2 referral; and
3. subject to the Mayor of London (or delegated authorised officer) advising that he is content to allow the Council to determine the case itself and does not wish to direct refusal, or to issue a direction under Article 7 that he does not wish to direct refusal, or to issue a direction under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application delegate authority to the Assistant Director Planning in consultation with the Director of Legal Services for the issue of the planning permission and subject to minor amendments to the conditions or the legal agreement.

2.1 That the Assistant Director Planning is delegated authority to issue the planning permission and impose conditions [and informatives] to secure the following matters:

Conditions

1. Time Limit
2. In Accordance With Approved Drawings
3. Material Samples
4. Landscaping
5. Landscape Management Plan (Including biodiversity benefits of the scheme which exceeds the minimum 10% recommendation in line with the London Plan)
6. Secured by Design
7. Delivery and Servicing Plan
8. Window and Railings Details
9. Photovoltaic Panels
10. Boundary Treatments
11. Water Efficiency
12. Energy Statement Compliance
13. External Lighting Scheme
14. Noise Protection
15. Air Quality
16. Contaminated Land
17. Surface Water Drainage
18. Sustainable Drainage Systems (SUDs)
19. Floodlighting for the MUGA
20. Car Parking Plan (including pick up and drop off parking area serving the new school, and the enlarged staff car parking area)
21. Disabled Parking Plan
22. Electrical Charging Points
23. Community Use Agreement (MUGA)
24. Community Use Agreement (School Hall)
25. Cycle Storage
26. Travel Plan
27. Demolition, Construction Management and Logistics Plan

28. Construction Hours (8.00am and 6.00pm Monday to Friday, and between 8.00am and 1.00pm on Saturdays and not at all on Sundays and Bank Holidays/Public Holidays.)
29. Highway Works
30. Wheel Washing
31. Fire Brigade Access
32. Detail of Fire Hydrants
33. Refuse and Recycling
34. Site Levels
35. Construction Ecological Management Plan
36. Archaeology

Informatives

1. Fee required for approval of details
2. Highway approval required
3. Secure by design
4. Street naming and numbering
5. Community Infrastructure Levy (CIL).
6. NPPF positive and proactive.

3 SITE AND SURROUNDINGS

- 3.1 The application site comprises the existing grounds of St. Edwards Academy currently in use as hardstanding overflow car parking occupying a broadly rectangular plot of land extending to 0.626 hectares in size. The application site also contains a small portion of Westlands Playing Field. Westlands Playing Field extends westwards from the application site and amounts to an area of 10.376 hectares. The site is relatively flat.
- 3.2 The school site is located to the east of Romford Town Centre and south of London Road (A118), with chalet residential bungalows facing the site across London Road. The site's northern boundary adjoins a hard surfaced school car park and the main access, which runs alongside the side gardens of the residential properties on London Road. The site's south eastern boundary adjoins the hard surfaced play court area of the school and the Westlands Playing Fields further south, which is designated Metropolitan Green Belt. To the south east of the site is a Site of Importance for Nature Conservation (SINC). The site's eastern boundary adjoins a main St Edwards School buildings.
- 3.3 A railway line marks the southern boundary of the wider playing fields, with the nearest train station situated in Romford, with links to Central London. To the north of the site is a sports pavilion and Judo hall. The site is approximately 1.8km east of Romford.
- 3.4 The school is accessed via London Road leading to the main car park for the existing school which serves both teachers and visitors and is also used by school buses for pick up and drop off. The access is also used by neighbouring residential houses to access their rear garages.
- 3.5 The site is currently well screened from wider views and is not readily visible other than from the playing fields themselves to the west and glimpsed views from the site

entrance to the north. Views from the west are of the hardstanding in the foreground with a belt of mature trees behind and the St Edwards Academy buildings beyond visible above the tree line. No public views are available from the south owing to levels, vegetation and the railway line.

- 3.6 The entire site lies within the designated Metropolitan Green Belt and the Thames Chase Community Forest area. There is an existing water course to the eastern boundary, and some mature trees and planting.
- 3.7 The application site also has a PTAL rating of 1b (Worst).

4 PROPOSAL

- 4.1 The application seeks full planning permission for the erection of a two storey building to provide a new Special Education Needs and Disabilities (SEND) school for both primary and secondary students with associated car parking, informal and formal play space, a shared use performing / community centre and a hard multipurpose games pitch (MUGA).
- 4.2 The proposed school will form part of the Unity School's Partnership (USP) Academies who manage the existing St. Edwards Academy. The school will have a capacity for 60 pupils and will be non-selective, serving children from Havering's local community, and an additional 45 members of staff would be employed on the site to support its operation.
- 4.3 The school would provide education for primary and secondary school age pupils with social, emotional, and mental health (SEMH) difficulties, and Autistic Spectrum Condition (ASC).

New building

- 4.4 The proposed school building would be sited on an existing hard surfaced overflow parking and small portion of Westlands Playing Field. It would be a two storey building with a broadly rectangular footprint. The building would comprise approximately 2,090sq.m of floorspace and accommodate all of the functions necessary for the facility to operate as an SEND school, including 12 classrooms with associated calm rooms and stores, a multi-purpose hall, dining hall and kitchen facilities, PE changing room, a training room and various other multipurpose rooms, a medical treatment room, a physio and therapy room and sensory rooms, a reception, school office and staff rooms, together with toilet facilities and equipment stores.
- 4.5 In addition, the building would accommodate a new multi-use hall which would also be made available for wider community use outside of school hours.
- 4.6 The main entrance to the school building would be on its north eastern elevation, facing St Edwards School. A lift within the building would provide full access across both floors in compliance with access requirements for those with impaired mobility.
- 4.7 In terms of scale, the building would have a footprint of approximately 64m by 19m and 26m wide in relation to the main hall. The main elevations would rise to a height of approximately 7.5m above ground level. The building would have a flat roof, with two compounds for roof mounted plant located on the northern part of the building's

roof, with the maximum height of the roof mounted plant being approximately 6.9m above ground level. The two plant compounds would be screened with profiled metal screening. The bulk of the roof would also accommodate solar PV panels centrally located, which would increase the roof height by approximately 1m to 8.5m from ground level.

- 4.8 In terms of external appearance, the front part of the building containing the main entrance and shared spaces would be of cement board finish rain screen cladding with the remainder of the building clad in timber. The elevational treatment would also involve the use of bright colours for window/door frames and canopies, the building's glazing would be complemented with spandrel panel inserts within the curtain wall glazing elements, which would reflect the sensory benefit of the proposed use.

Access, parking and drop off arrangements

- 4.9 The three existing vehicular access points from London Road would be retained, with the existing northern-most access point continuing to serve the staff car park of St Edwards Academy. The central access point would remain unchanged, and continue to serve the visitor car park. The existing school access off London Road, through the car park would provide the main access to the new SEND school in a one-way system leading to the entrance gate.

- 4.10 This access would allow for one way vehicle movements and provide a segregated pedestrian footpath on the north eastern side. It would be fitted with a sliding gate for secure access, which would provide access to a pick up and drop off facility for the SEND school which would be laid out in front of the new building. This would include 4 bays for pick up / drop off by parents and guardians (of which two spaces would be blue badge spaces), together with three bays for minibus pick up / drop off parking. In addition, this area would also include a dedicated pick up / drop off lane for minibuses and taxis adjacent to the front of the school building. This drop off lane would be able to accommodate up to five minibuses or seven taxis at any one time.

- 4.11 In addition to this, 14 staff car parking spaces for staff of the new SEND school would be laid out towards the northern corner of the site on an existing grassed area. It is proposed that the staff car park would be used to provide car parking associated with the wider community use of the school facilities outside of school hours.

- 4.12 Service vehicles and refuse vehicles would continue to use the existing vehicular access point.

Outdoor space and landscaping

- 4.13 The SEND school would be provided with its own dedicated outdoor play space, located to the west of the building. This would include a soft informal play area and hard outdoor MUGA area. These spaces would be surrounded using fencing of heights ranging between 1.8 and 2.4m with the MUGA sports courts having stop mesh fence of 3m height to separate them from the wider playing fields of Westland Fields.

5 PLANNING HISTORY

- 5.1 The following planning decisions are relevant to the application:

P0692.18 – Excavation of 3,800 cubic metres of soil, construction of new football ground with synthetic grass pitch, floodlighting, fencing, club house, food kiosk and machinery store, spectator stand, parking and access road..

Approved. 5/11/2018. This permission has not been implemented and has now lapsed.

P0414.14 - Demolition of 4 existing prefabricated classrooms and erection of a permanent single storey building for 6 classrooms

Approved 19/05/2014

P0845.09 – New football ground including pavilion clubhouse with covered seating area, covered terracing stand, toilet block, floodlight masts, car parking area and access road.

Approved 06/09/10

P2264.06 – Demolition of existing sports pavilion and maintenance store (existing public WC's to be retained). New build of pavilion incorporating changing rooms, WC's, multipurpose room and maintenance stores. Revised plans.

Approved 31/01/07

P1015.05 – Demolish existing sports pavilion, public WC's, and maintenance store and replace with new pavilion incorporation public WC's and maintenance store.

Approved 05-10-2012

P1513.04 - Demolish existing sports pavilion, public WC's, and maintenance store and replace with new pavilion incorporation public WC's and maintenance store

Approved 07-10-2004

P0683.09 - Demolition of up to 6,550sqm of existing floorspace and the re-development of 9,450sqm new educational floor space (Class D1) together with associated landscaping and access – Outline.

Approved 14-08-2009

Pre-Application Discussion

Prior to the submission of this planning application, the applicant has engaged with LBH planning and design officers over the last 12 months. Officers agree that the site comprises previously developed land and the principle of a new special needs school development is acceptable subject to the application submission demonstrating that massing, height layout, access and landscaping are acceptable and a very special circumstances can be demonstrated to mitigate the impact on the openness of the Green Belt and that the loss of the playing fields can be justified or an alternative/replacement sports pitch is provided. In respect of the design of the proposals, the scheme has also been subject pre-submission QRP review and post submission discussions with Officers. Officers expressed throughout the pre-application process that the quantum of development and layout arrangement will carry significant weight in the determination of an acceptable proposal.

The design has evolved in order to maintain the level of openness and greenery in the context of its Green Belt location and still introducing a contemporary modern building fit for purpose. This matter is discussed in the Principle section of the report.

Summary of QRP Comments and Response from Applicant

QRP Comment	Applicant Response	Officer Remark
<p>The panel feels that the approach, especially for pedestrians, is problematic. The route loops around the car park and past a series of openings from the main hall, and as a result, the scheme lacks a sense of arrival, especially for students.</p>	<p>It is important to note that due to the special needs of the pupils, the vast majority are expected to be transported to the school by LEA-provided minibuses or taxis. As such, there is very limited potential for mode shift to walking, cycling or public transport and it has been necessary to cater for safe and efficient pick-up and drop-off movements within the site boundary, so that pupils can be escorted directly to and from the building and that they arrive ready to learn.</p> <ul style="list-style-type: none"> • It is forecast that 86% of pupils (i.e. 52) will travel by LEA taxi/minibus, 12% (7) will travel by parent car and the remainder (2) will travel by foot or public transport. <p>Potential alternative pedestrian routes have been explored and discounted, primarily as they would cross live traffic lanes within the Council car park and/or at the school access and egress points. The proposed route is considered to represent the safest and most accessible route from London Road to the school entrance. For staff or visitors arriving by foot or public transport.</p>	<p>Alternative pedestrian routes have been explored with officers. The proposed route is considered to represent the safest and most accessible route from London Road to the school entrance. For staff or visitors arriving by foot or public transport.</p>
<p>While understanding the rationale for locating communal uses at the front of the site, the panel feels that this compromises arrival at the building and it therefore would like to see the design team explore alternative arrangements of the hall, the kitchen, the dining area and the stores, so the entrance aligns with the main pedestrian route to the west of the car park.</p>	<p>The arrangement of spaces at the front of the school has been carefully designed to fulfil the school's functional requirements, while also creating a clear and welcoming main school entrance. The design of this area has been driven by the following constraints:</p> <p>It is important that deliveries to the kitchen are able to take place without having to go past the school's secure line. This is both for</p>	<p>The location of the communal area to the front will reduce conflict when the area is used by members of the public. The building has been designed to minimise interaction with the public for community use.</p>

	<p>ease of deliveries, as well as for the safeguarding of the school pupils. This necessitates that the kitchen is located at the front of the school adjacent to the car park</p>	
<p>The panel has some concerns about the appropriateness of the proposed corridor lengths, despite their relatively generous width. It suggests that the design team explore the potential for introducing variation along their length to create spaces that could be used for unprogrammed activity.</p> <ul style="list-style-type: none"> • The plan does not appear to provide space for one-to-one teaching and support. 	<p>The design has been developed following the Trust's requirements for straight walls along the corridors to avoid distractions for the pupils.</p> <p>Open plan breakout spaces opening onto the corridors would therefore be inappropriate for the type of pupils who will be using the school.</p> <p>The corridor lengths on both ground and first floor are relatively short, due to doors splitting the corridor into three clear zones on each floor.</p>	<p>The applicant has addressed the concern raised. The internal arrangement is considered to meet the need of the end user and as a SEND school.</p>
<p>Natural light will also be important and roof lights could be considered along the corridor on the first floor. Similarly, additional glazing could be considered at the stairways, although this would need to be tested against the potential for overheating.</p>	<p>Windows have been added to the staircases at first floor to increase the amount of daylight in these circulation spaces.</p> <ul style="list-style-type: none"> • The corridor at first floor level achieves the daylighting requirements outlined in the Department for Education recommendations. The corridor at has windows included at the end of the corridor and stairwells. This is paired with internal glazing between the adjacent teaching areas and the internal corridor, which will allow for borrowed natural light to reach the internal corridor. The image on this page shows the inclusion of roof lights at this level would cause some issues. The first of which is the potential for the roof lights to cause an overheating risk in communal areas. These areas are used intermittently and would require additional ventilation and or cooling to maintain temperatures, which in turn would increase energy, carbon emissions and utility costs for the school. 	<p>The design of the new building reflects the improvements sought by the Panel.</p>

	<p>The roofscape is designed as a green roof in order to fulfil the requirements of the Urban Greening Factor - any rooflights would reduce the amount of green roof available.</p>	
<p>The way in which the new school will relate to and interact with the existing academy is not yet sufficiently clear.</p>	<p>The Trust operate both schools and interaction between pupils and staff is important.</p> <p>The entrance at the SEN school is therefore located to provide easy and direct access between the two schools, with the secure line and fences designed in a way to promote this link between the two schools.</p> <ul style="list-style-type: none"> • The site layout of the proposed school is part of a wider campus design. 	<p>Officers are in support of the layout between the existing school and the new school. Main entrance to the new school is easily linked with the existing.</p>
<p>The landscape detail presented is limited, but seems to suggest that much of the planting envisaged is restricted to hedging and small trees, rather than something of greater interest. Consideration should be given to introducing larger trees into the landscape design.</p> <p>The use of native species is welcomed, but their climate resilience and contribution to biodiversity should be thoroughly tested.</p>	<p>All trees and vegetation along the eastern boundary of the site and St Edwards will be retained and enhanced through creation of a designated habitat study area adjacent to the water course.</p> <ul style="list-style-type: none"> • A number of existing semi-mature and middle aged trees (including Oak, Cherry, Maple, London Plane) are present within the proposed habitat area to the east boundary. These will all be retained as features within the development. <p>With larger tree use limited it is proposed that a mix of native hedge planting, small amenity and fruit trees, species rich grass seeding and shrub planting will be used in order to create a native and biodiverse landscape that is complimentary to school use and protection of the underlying public utilities.</p>	<p>The Landscape Consultant is satisfied with the quality of the landscape with regards to its end user. Applicable conditions for species and maintenance has been recommended.</p>

<p>The panel would like to see the potential for exchanging the locations of the soft, informal amenity space and the MUGA. This would provide a more interesting outlook from the classrooms and would create the potential for a better relationship with the currently ambiguous space between the site and the football pitch.</p>	<p>Moving the MUGA towards the north of the site is not possible as it requires the building to move east:</p> <ol style="list-style-type: none"> 1. The distance between the western site boundary and the hall is not wide enough to fit a standard MUGA and still maintain access to the west elevation for maintenance. 2. It is not feasible to move the building 2m east to accommodate the MUGA due to the root protection zones around the mature trees in the east of the site. 3. Moving the MUGA further north is not possible as it reduces the amount of car parking and it is not feasible to relocate the sub-station. 	<p>Officers are satisfied with the proposed layout considering the site constraints.</p>
<p>The panel is pleased to see that some external shelter has been provided along the western elevation, which will allow for greater opportunities for outdoor teaching. It would like to see the potential for providing additional shelter explored, for example within the soft, informal amenity space.</p>	<p>External shelters are provided immediately outside all the early years classrooms; on the south side of the school outside the reception classroom, as well as outside two of the KS1 classrooms on the western elevation of the school.</p> <ul style="list-style-type: none"> • The depth and width of these shelters provide ample sheltered play space immediately linked to the classrooms. • The canopies in these positions have been tested to ensure that there is still adequate daylighting within the classrooms spaces. 	<p>The current proposal is a much improved scheme with shelter areas spread around the school ground.</p>
<p>The intention to use off-site construction has the potential to make a positive contribution to the scheme's environmental sustainability, particularly in relation to the efficient use of materials and to the building's airtightness.</p> <p>While airtightness is a benefit overall, it does create some issues around ventilation, and the panel would like to see further consideration of how this will be addressed.</p>	<p>The ventilation strategy has been specified and designed with consideration to the air tightness and end user requirements. Within Havering SEND we have three ventilation strategies to suit the differing room types.</p> <p>The teaching areas will be ventilated via a hybrid mechanical unit.</p> <p>The main hall will be ventilated via roof mounted windcatchers, which</p>	<p>The internal arrangement as submitted are considered to be fit for purpose.</p>

	<p>passively ventilate and provide an element of free cooling into the main hall. Regardless of the wind direction, the louvres will capture the prevailing wind.</p>	
<p>The panel feels that the thermal properties of the building fabric could be revisited to ensure that it is as efficient as possible.</p> <p>Similarly, the risk of overheating should be thoroughly investigated and a cooling strategy be devised. More generally, the panel would like to see wider consideration given to the climate change impacts on the building, including the need for shading and the resilience of the building.</p>	<p>The specification and performance of the fabric specification has been designed in accordance with the energy hierarchy, to passively reduce energy associated with space heating, cooling, ventilation and artificial lighting in a balanced manner.</p> <p>The principle of the approach within Havering SEND, is that the fabric and ventilation design will mitigate the overheating risk for the majority of the time. However, given the nature of the students and limited opportunity for openable windows, it is important that provision for active cooling is provided for the worst-case scenarios. The figure below shows a worst-case scenario for cooling, whereby the passive measures mitigate the cooling for the majority of day and active cooling is only engaged when absolutely necessary. These systems are all passively operated, which allows the teaching staff to focus on the pupils, rather than having to manually open windows or actively manage equipment.</p>	<p>Sustainable materials are proposed to be used. Supporting statements show a building providing a comfortable environment for its end user.</p>
<p>The scheme does not adequately encourage sustainable modes of transport, with an implied assumption that drop off by car will be the norm. The level of bike storage proposed also appears to be relatively low.</p> <ul style="list-style-type: none"> • However, the provision of EV charging points is welcome, and the panel urges to design team to explore ways in which this provision – or the potential for expanding it in future – could be enhanced. 	<p>The specialist needs of the pupils are such that travel by non-vehicular modes is not viable. As such, the School Travel Plan – a draft of which will be submitted with the planning application – will be focussed on staff.</p> <p>A total of 18 parking bays will be provided on-site, of which 2 will be allocated for disabled use and 2 for visitors. 3 of the staff parking spaces will be provided with 'active' Electric Vehicle (EV) charging infrastructure.</p>	<p>The level of provision are considered acceptable. The GLA or the Highways Authority have not raised any fundamental concern.</p>

<p>While welcoming the commitment to off-site construction, the panel questions the logistics of bringing the modules onto site, given the tight turning and busyness of London Road. It would therefore like to see attention given to the practicalities of accommodating construction traffic at the site.</p>	<p>Construction delivery times will be established to curtail any build-up of onsite traffic and minimise construction vehicle movements during rush hour periods. Deliveries will be made outside of peak traffic hours, and on a 'just-in-time' basis, reducing the number of vehicles present onsite at any one time. Construction vehicles will avoid access and egress to site during the hours of 8:00-9:00 (peak traffic hour/school arrival time) and 15:00-16:00 (school leaving time).</p>	
<p>The building's frontage is largely utilitarian, with a high proportion of it given over to services and stores. To understand how this will function in practice, the panel would like to see an elaboration of the servicing strategy.</p>	<p>There are two doors that are located on the northern elevation that access plant rooms. These rooms are required to be located to allow 24 hour access from the exterior, from the car park side of the secure line. The rooms will be frequently accessed.</p> <p>The door colour has been changed from blue to yellow to coordinate the doors better with the hall doors and not distinguish as service doors which the previous colour did to some degree.</p> <ul style="list-style-type: none"> • The northern facade has been fully coordinated between all design disciplines, with the servicing strategy taken into account in the design of this facade. Additional penetrations / louvres will not be required to be introduced at a later date. • The developed design now incorporates the entrance canopy which activates and adds interest to the building's frontage. 	<p>The developed design now incorporates the entrance canopy which activates and adds interest to the building's frontage making it more legible and an attractive building in its context and character.</p>

Following previous Pre-App and QRP comments, the design team attended a post submission meeting with Council urban design officers to address previous concerns raised. Through this process the design team made updates to improve the quality of the scheme. Urban design officers are satisfied that these updates have created a scheme of acceptable quality that integrates appropriately within the surrounding context.

Community and Stakeholder Engagement

A Statement of Community Involvement (SCI) accompanies the application and this document explains the programme of public consultation and community engagement carried out prior to the submission of the application. As part of its programme of community engagement, the applicant has initiated a number of public consultation exercises including leaflets distribution and an online presentation was conducted due to Covid-10 restrictions, where questions and comments could be posted and recorded.

The applicant's response to the issues raised in the course of the public engagement contained in the SCI is as follows:

1. "I think this proposal sounds wonderful and is very much needed in the borough. My only concern is the surrounding area is incredibly busy during rush hour and would take a considerable amount of time to get to"

Alongside the scheme, a Transport Assessment and a Travel Plan have been developed and submitted with the application to assess the impacts on travel times as a result of the new school. Pupil travel will predominantly comprise organised multi-occupancy taxi travel, whilst the school hours will be staggered with St Edward's Academy. By providing much needed SEND school places within the Borough, travel out of Borough will also be minimised.

2. "How will this affect the neighbouring residents? Will the remaining green space be opened for the local residents to walk or sit in?"

At present, the proposals do not include any change to how the playing fields are currently used and managed; the proposed school would have use of the MUGA during the school day for outdoor PE. The development will utilise modular construction which will minimise onsite construction time and any impact to neighbours. The proposed school is for 60 pupils and it is anticipated the majority of pupils will arrive to site via multi-occupancy taxis and minibuses, keeping additional vehicle use to a minimum

Response to the public consultation was minimal and a total of only two comments were received. Based on this, the scheme has been well-received by the public.

6 CONSULTATION RESPONSE

6.1 Statutory and Non Statutory Consultation

- 6.2 A summary of the consultation responses received along with the Officer comments

Greater London Authority Stage 1 Response – Plan policies on Education facilities, Green Belt, Open Space, Urban Design, Heritage, Transport, Sustainable Infrastructure and Environment are relevant to this application. Whilst the proposal is

supported in principle, the application does not fully comply with these policies, as summarised below:

Land use principles: Education use is supported. Although the development is considered inappropriate development in the Green Belt, as it does not satisfy any of the exception tests in paragraph 149 of the NPPF, the applicant has demonstrated very special circumstance in regard to the acute need for a SEND school in the borough and that there are no alternative sites that are sequentially preferential. The principle of the school in the Green Belt is therefore supported. London Plan Policies SI 3 and G2.

Urban Design: Further details are required in relation to the Fire Statement. London Plan Policy D12.

Heritage: Confirmation is required that there are no heritage assets within the local vicinity. London Plan Policy HC1.

Transport: Further consideration is required in relation to the drop off point and safety of the pedestrian route. Further information is required in relation to its need in terms of the quantum of cycle parking. London Plan Policies T5, T6 and T6.5.

Sustainable Infrastructure: Further information is required in relation to energy. Insufficient information is provided in relation to Whole Life Carbon and Circular Economy Statements. London Plan Policies SI 2 and SI 7.

Air Quality: The submitted air quality assessment has not provided an evaluation of the impacts of the proposed development on local air quality (either through additional traffic on the local road network, or through emissions associated with energy plant), nor has it provided an air quality neutral assessment.

The proposed development is for a highly sensitive land use (i.e. education) and only qualitative evidence has been provided in the assessment of air quality for future occupiers. In this case, further information is required in order to demonstrate that the proposal complies with the requirements of London Plan Policy SI 1(B)

Environment: Further information/ clarification is required in relation to Flood Risk, drainage, water efficiency and air quality. London Plan Policies SI 12, SI 13, SI 5 and SI 2.

Recommendation

That Havering Council be advised that the application does not yet comply with the London Plan for the reasons set out above. Possible remedies set out in the State 1 response could address these deficiencies. The Mayor does not need to be consulted again if the borough decides to refuse the application.

Updated comments following additional info provided by applicant

Urban Greening - no further information required.

Heritage - no further information required.

Flooding/ Draining - no further information required.

Water Efficiency -No further information required. Condition to be required.

TfL – Awaiting TfL's response

Fire Statement – Thank you for the additional information. Can you update the fire statement to include the additional information with regards to the materials and future modifications so that it contains all the correct information when it is secured by condition.

In regards to a suitable qualified third party - as the application is defined as a major application i.e. over 0.5 hectares, Policy D12 requires that the Fire Statement is authored / prepared a registered fire engineer. Please see the guidance relating to suitably qualified third parties. Please could you ensure that a registered fire engineer reviews and sign-off the Fire Statement including their name and qualifications within the statement.

Air Quality – No further info required.

LBH Education – One of the main findings of Havering's High Needs Strategy was the need to develop more provision for children and young people with Autistic Spectrum Disorder (ASD) and Social, Emotional and Mental Health Needs (SEMH).

The new special school will help address the demand for a suitable, local specialist provision for pupils aged 3 to 16 with SEMH and ASD needs.

Forecasts for Havering residents, in years Reception to year 11 with an Education Health Care Plan or a statement of Communication and Interaction needs are expected to rise significantly in the next few years. The forecasts show a 90% expected increase in this type of need for Reception to year 11 pupils from 653 in 2019/20 to 1243 in 2025/26. The majority of the increase is expected to be pupils with a primary need of Autism Spectrum Disorders (ASD).

Similarly, forecasts for Havering residents, in years Reception to year 11 with an Education Health Care Plan or a statement of Social, Emotional and Mental Health (SEMH) needs are expected to rise significantly in the next few years. The forecasts show a 94 % expected increase in this type of need, for Reception to year 11 pupils from 157 in 2019/20 to 305 in 2025/26.

The creation of a new SEMH and ASD school should reduce the need to place pupils outside of Havering, thereby reducing the cost of out of borough placements.

A new special school catering for pupils with SEMH and ASD, would support the Local Authority in meeting the needs of these children within a local setting, in line with the priorities as set out in Havering's High Needs Strategy.

LBH Highways

Initial Response –

Highway engineers have examined the Design and Access Statement (DAS) by HLM Architects published on 14/06/21 in respect with the above planning application and below are our comments.

1. *Site Parking*, (DAS, page 19 of 97) states that the school day will be staggered with St Edwards Academy to reduce conflict during peak periods and ensure the continued efficient operation of this car park.

LBH comments: St Edwards School operates during school term times, Monday to Fridays and possibly at the weekends for special events. Officers cannot see how the parking will be staggered with St Edwards School.

Applicant's response - It is acknowledged that both St Edward's Church of England Academy and the proposed school will operate Monday to Friday; however, the proposed school day will be arranged so as not to coincide with the arrivals and departures of pupils at St Edward's Academy, to avoid conflict within the northern car park.

Officer comment – Noted and accepted by the Highways Engineer

2. It has been stated (page 31 of 97, bp 7) that following a meeting with the head teacher of St Edwards CofE that buses deviate into the car park at peak hours, the Travel Plan does not incorporate this important issue

LBH comments: In the past buses on route 86 used to deviate from their normal routes and entered into St Edwards Playing fields to collect pupils from the school grounds to prevent them from overcrowding at the existing bus stops in London Road. The funds for the measures were provided by Transport for London under Bus Priority. I was a scheme manager at the time and I have full knowledge about the implemented measures. The above measures were later abandoned by relocating the former bus stop (for west bound bus routes) in London Road located on the east side of the access to the school to west side of the school entrance by allowing direct access from the school grounds to the relocated bus stop. This needs correction in the report.

Applicant's response – As detailed in the submitted Transport Assessment (TA), public transport is forecast to account for only one per cent of pupil journeys to and from the site. The TA indicates that eight staff are expected to travel by bus; however not all of them will utilise these services during the school or network peak periods, by virtue of staff working patterns (as highlighted in the TA) and the staggering of the school day, as detailed above. As such, it is not considered that the proposals will materially impact current bus operations and therefore no amendments to the TA or Interim Travel Plan are required.

Officer comment – Noted and accepted by the Highways Engineer

3. *Further information required*

On highway matters, officers will need the following information to provide further comments on the application:

- Modelling of existing junction with A118 London Road by PICARDY to assess the junction capacity at peak periods given that there will only be a single access which will accommodate two way traffic. Consideration is given to proposing a right turn pocket at the junction for safety grounds
- If the above junction is altered to accommodate the traffic, the developer must enter into s278 Highways Agreement. Furthermore, a Road Safety Audit, Stage 1 would be required.
- The football club to the west side of the application site – officers suggest that the transport assessment must take into consideration the trip generated by both the new school and that by the football club. Officers are aware that the times will not coincide but the worst case scenario is assessed. [Following my telephone conversation with the case officer, I have been made aware that the planning application for the football stadium has lapsed and that a new application will be submitted in the future. As a result, I am excluding this item from my comments

Applicant's response – The proposed school is modest in scale, attracting limited peak period vehicle trips and as has been noted, the school day will be staggered with that of St Edward's Academy to ensure that there is no material increase in use of the site access at any one time. For these reasons, it is not considered necessary to consider this junction further in highway capacity terms. It is understood that the planning application for Romford Football Club has recently lapsed and therefore no further consideration of it is required

Officer comment – It has been confirmed that the football club will not be developed at present as the planning permission has lapsed. The proposed school would not generate significant additional traffic to affect the existing junction. Should an application for the football club be submitted in the future, the capacity of the junction will be assessed further.

Noted and accepted by Highways Engineer.

4. *Well installation and monitoring report by SUBADRA*

Officers had examined the above report and it appears that there is Seepage (ground water movement) in the underground of the proposed development. As this is the case, it is recommended that the scope of the works must be extended for the geotechnical engineers to identify the following matters:

- i) Prepare feasibility design on the foundation type e.g. strip or raft or piled.
- ii) In the event of rise of ground water level, identify means of discharging the overflow to the existing/new surface water system. Prior to this Environment Agency must be consulted.

5. *Transport Assessment by DHA*

Officers have examined the above report and are in agreement with the following:

- Trip attraction, distribution and assignment

- Refuse will be collected from a bin store located on north side of pupil pick up and drop off area
- Passive EV charging points.
- Cycle parking provisions with potential to expand it in future

6. *Construction and Environment Management Plan*

We have the following comments:

- The contractor must ensure that the site is well protected when not working on site like the weekends or the site is shut during week days.
- A banksman must be present at the time when the building works are in progress.
- All deliveries must take place once the St Edward's school has commenced and recreational and lunch times must be avoided.

Landscaping matters must be checked with the Council's Horticultural officer.

Officer comment: Noted and appropriate condition recommended.

LBH Environment Health – (Noise) Having considered the noise report submitted in support of the above application used the wrong criteria in assessing plant noise emission. Therefore, recommend refusal on noise grounds unless the following conditions can be attached and enforced.

Officer comment: Noted and appropriate condition and informatives suggested

LBH Environment Health – (Contamination) The soil test results showed no exceedance of the relevant assessment criteria, therefore the risks to human health posed by land contamination are considered relatively low. With this in mind, no further remediation works are required. However, I recommend our standard unsuspected contaminated land as a precautionary condition should approval be granted.

LBH Environment Health – (Air Quality^{1st} response) - The development is located within a designated Air Quality Management Area (AQMA) due to high concentration of nitrogen dioxide and particulate matter. Based on the submitted Air Quality Assessment, no objection to the proposal subject to condition.

The applicant has provided a more detailed survey report in response to GLA Stage 1 response that of the LBH Environmental Health officer. GLA has now removed its reservation.

LBH Environment Health – (Air Quality^{2nd} response)

I have reviewed the air quality assessment and CEMP, with attached dust management plan (DMP) and have the following comments:

I am happy with the CEMP and DMP, so can agree that my suggested DMP condition is no longer needed. A condition to secure the DMP and ensure the measures set out is followed is recommended.

With regard to the air quality assessment (AQA), I agree that the condition requiring an AQA is no longer needed, as it is satisfactory. The only thing I am not happy with, is the air quality neutral assessment, which is included in the AQA. At the moment there is a Draft guidance on AQ neutral and although I appreciate that it is not a formal document, the existing guidance from 2014 is, to a large extent, outdated. I would like to retain the condition requiring an air quality neutral assessment, in relation to transport emissions in particular.

Officer comment: Noted and appropriate conditions and informatives recommended

LBH Ecology Consultant – The landscape plans show that the area of existing scattered scrub adjacent to the stream as wildflower grassland, and some of this area is within the red line and some is outside of it. It is unclear why one habitat will be completely removed and replaced by another. The Preliminary Ecological Appraisal should be updated to reflect this. We would recommend that the existing habitat is retained and enhanced, rather than removing and replacing it. Apart from this issue, we are satisfied that there is sufficient ecological information available for determination. No fundamental objection subject to securing biodiversity mitigation and enhancement measures.

LBH Landscaping Consultant – No fundamental objection. If minded for approval we would advise the following recommendations are taken into consideration:

- We welcome tree planting as part of the proposal, however, the Soft Landscape Layout Plan shows tree planting within the sewer easement zone and we question whether this is suitable and has been approved by the appropriate providers. Given the tree planting contributes heavily towards the Urban Greening Factor (UGF), we would expect effected trees to be relocated elsewhere within the site boundary.
- The native boundary hedgerow mix should extend around the perimeter of the MUGA, rather than the proposed ornamental hedgerow.
- The UGF table should provide sufficient details of the type of greening to allow interpretation and checking of the UGF types. Currently the table provides the factors and areas, but does not show the calculations, nor the overall site area, which is needed to calculate the combined UGF.

Officer comment: Noted and appropriate condition and informatives suggested

LBH Waste Management – No fundamental objection. Ensure sufficient numbers of refuse and recycling bins at this site.

London Borough of Barking & Dagenham – No observations to make on this application. However, the borough would support any delivery of a SEND school in the area.

Sports England –

Aerial photographs indicate that the hardstanding has not had sport court markings until recently but this has been confirmed to be a temporary measure during the pandemic. Sport England will take a pragmatic view and accept that the hardstanding, in this instance, is not a sports facility although it appreciates that it could be used for physical activity purposes.

The proposed MUGA, car park and soft informal play area would encroach onto Westlands Playing Field. Now that the stadium permission on the playing field has lapsed the area of playing field lost is considered usable playing field both now and in the future. The proposed MUGA, which would have sports lighting, would be available to the community throughout the peak period for community sport therefore representing a new durable sports facility that would be able to accommodate more play (in terms of time) than the area of playing field it would replace. As a result, it would not only be of benefit to the proposed school's children but also the community consequently Sport England considers that the proposed MUGA would meet Exception 5 of Sport England's Playing Field Policy which states:

'The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.'

In light of these specific unique circumstances, whilst some of the scheme would be contrary to Sport England's Playing Field Policy, Sport England consider there to be sufficient benefits locally to depart from its policy and not object to the proposal on the basis that the proposed MUGA sports lighting is designed and constructed in accordance with Sport England's guidance, the proposed hall is fitted with the Plastic Elastic flooring and the recommended condition be imposed should planning permission be granted.

Officer comment: The Applicant has responded to the points raised by Sport England. Sport England have therefore removed their objections subject to recommended conditions

Thames Water – (Foul Water and Surface Water) no objection to the application if the developer follows the sequential approach to the disposal of surface water from the new development in accordance with Policy Si 13 Sustainable drainage of London Plan 2021. However, approval should be sought from the Lead Local Flood Authority.

We would expect the developer to demonstrate what measures that will be undertaken to minimise groundwater discharges into the public sewer.

Anglian Water – It falls outside of our statutory sewage boundary – we have no comment.

Designing Out Crime Officer – No fundamental objection subject to conditions.

Historic England – The planning application lies in an area of archaeological interest. If planning permission is granted, the applicant should improve knowledge of assets and make it public.

The application site sits on the archaeologically productive Hackney Gravel and lies within Areas of Archaeological Potential connected with the excessive cropmarks in the area and on the line of the London Colchester Roman Road corridor. In keeping

with advice on the Westlands Playing Field next door, a condition is appropriate to manage archaeology. As such, a two stage archaeological condition is recommended to provide an acceptable safeguard.

Officer comment: Noted and appropriate condition and informatives suggested.

8 LOCAL REPRESENTATION

- 8.1 The application was advertised via a Press Notice and Site Notice displayed at the site for 21 days.
- 8.2 A total of 151 consultation letters were sent to neighbouring properties regarding this application.
- 8.3 2 representations (1 objection, 1 comment with condition) have been received.

Representations

- 8.4 The following issues were raised in representations that are material to the determination of the application, and they are addressed in substance in the next section of this report:

Objection

- i. I strongly object for the proposal not to be granted as it will affect my property drastically.

Comment with condition

- ii. I think it will give a rise to much more traffic on the road outside the school and the surrounding roads, in the morning and afternoon it is bad enough with cars parking down southern way. Is parking going to be made available in the school? Is the access road going to be off the main road? Also, the traffic that will be serving the new building will that be coming in the main entrance of the school or down southern way? I have no objection to the building itself just the increase in traffic and noise.

Officer comment: The issues raised are addressed in the context of the report.

9 Relevant Policies

- 9.1 The following planning policies are material considerations for the assessment of the application:

National Planning Policy Framework (2021)

The National Planning Policy Framework (NPPF) sets out Government planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced. Themes relevant to this proposal are:

- 2 - Achieving sustainable development
- 8 - Promoting healthy and safe communities
- 9 - Promoting sustainable transport
- 11 - Making effective use of land
- 12 - Achieving well-designed places

- 13 - Protecting Green Belt land
- 14 - Meeting the challenge of climate change, flooding and coastal change
- 15 - Conserving and enhancing the natural environment
- 16 - Conserving and enhancing the historic environment

DCLG Policy Statement Planning for Schools Development 2011

Sport England Planning Policy Statement – Policy Guidance for Planning Applications for Development on Playing Fields

London Plan 2021

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- .. GG6 Increasing efficiency and resilience
 - D1 London's form, character and capacity for growth
 - D2 Infrastructure requirements for sustainable densities
 - D3 Optimising site capacity through the design-led approach
 - D4 Delivering good design
 - D5 Inclusive design
 - D8 Public realm
 - D11 Safety, security and resilience to emergency
 - D12 Fire safety
 - D13 Agent of Change
 - D14 Noise
 - G1 Green infrastructure
 - G2 London's Green Belt
 - G3 Metropolitan Open Land
 - G4 Open space
 - G5 Urban greening
 - .. G6 Biodiversity and access to nature
 - G7 Trees and woodlands
 - G9 Geodiversity
 - HC1 Heritage
 - S1 Developing London's social infrastructure
 - S2 Health and social care facilities
 - S3 Education and Childcare Facilities
 - SI1 Improving air quality
 - SI2 Minimising greenhouse gas emissions
 - SI4 Managing heat risk
 - SI7 Reducing waste and supporting the circular economy
 - SI12 Flood risk management
 - SI13 Sustainable drainage
 - T1 Strategic approach to transport
 - T2 Healthy Streets
 - T3 Transport capacity, connectivity and safeguarding
 - T4 Assessing and mitigating transport impacts
 - T5 Cycling
 - T6 Car parking
 - T6.5 Non-residential disabled persons parking

- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning
- DF1 Delivery of the Plan and Planning Obligations

Sustainable Design and Construction (2014)

This SPG contains advice on natural resource management, climate change adaptation and pollution management. It reinforces similar policies contained within national and local planning policy.

Character and Context SPG (2014)

This document sets out the principles of site responsive design that should inform the Design and Access Statement to be submitted with the application, helping to promote the right development in the right place.

Accessible London SPG

This and the document Design and Access Statements: How to write, read and use them (Design Council, 2006) guidance from Design Council CABE will also help to inform preparation of the Design and Access Statement needed to accompany the application.

Havering Local Plan (2021)

The following policies should inform design of the proposed development:

- 16 - Social Infrastructure
- 17 - Education
- 23 - Transport connections
- 24 - Parking provision and design
- 25 – Digital Connections
- 26 - Urban design
- 27 - Landscaping
- 29 - Green infrastructure
- 30 - Nature conservation
- 33 - Air quality
- 34 - Managing pollution
- 35 - On-site waste management
- 36 - Low carbon design, decentralised energy and renewable energy

Havering Supplementary Planning Documents (SPDs)

Aspects of the following documents apply to the proposed development though need to be read in combination with newer mayoral guidance:

- Sustainable Design and Construction (2009)

10 MATERIAL PLANNING CONSIDERATIONS

10.1 The main planning issues raised by the application that the committee must consider are:

- Principle of Development
- Design, character and setting of the building
- Impact on the residential amenity of neighbouring occupiers
- Access, the impact on the highway network and parking provision

- Flood Risk and Development
- Sustainability
- Noise and Air Quality
- Archaeology and Contamination
- Ecology / Greening and Biodiversity
- Financial and Other Mitigation
- Other Planning Issues

10.2 Principle of Development

School use and Need

10.2.1 London Plan Policy S3 Education Facilities sets out that the Mayor will support the provision of education facilities to meet the demands of a growing and changing population to enable greater educational choice, and that the establishment of new schools, including academy and free schools, is strongly supported in this context. The policy identifies that development proposals which enhance education and skills provision will be supported, including new build, expansion of existing schools and changes of use to educational purposes. The policy confirms that proposals for new schools should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the use of appropriate planning conditions or obligations.

10.2.2 In addition, the policy encourages the co-location of services between schools and colleges in order to maximise land use, reduce costs and develop the extended school or college's offer. This policy approach complements the NPPF which confirms that the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities, and that local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and give great weight to the need to create, expand or alter schools. The proposed development is for a new SEND school that will be co-located on the site of an existing academy school and will provide the facilities to meet an identified local educational need. It is therefore considered that the principle of educational development on the site complies with the relevant policies of the development plan and the guidance set out in the NPPF.

Green Belt

10.2.3 The application site lies entirely within the Metropolitan Green Belt as identified in the Local Plan.

10.2.4 Paragraph 137 of the NPPF confirms that the Government attaches great importance to Green Belts and that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The key planning consideration for any proposed development in the Green Belt is whether the proposal will have a greater impact on the openness of the Green Belt and the purpose of including land within it. In this context, 'openness' simply means "an absence of any buildings or development". This principle is reflected within the relevant policies relating to the Metropolitan Green Belt within the Local Plan and the London Plan.

- 10.2.5 Paragraph 147 of the NPPF makes clear that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 expands on this to state that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
- 10.2.6 The proposed school building does not meet any of the exception criteria and as such would constitute inappropriate development within the Green Belt. In relation to the proposed outdoor recreation facilities including the MUGA sports pitch, one of the defined exceptions is the provision of appropriate facilities for outdoor sport and recreation, which is not necessarily inappropriate development within the Green Belt as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.
- Very Special Circumstances and Need Test*
- 10.2.7 Recognising that the proposed school building would constitute inappropriate development within the Green Belt, the applicants have presented a case for very special circumstances within the planning statement which accompanies the application.
- 10.2.8 A summary of this case for very special circumstances is presented below. This revolves around the pressing need for new SEND school capacity within the borough, and has involved an assessment of the alternative options/sites for meeting this need.
- 10.2.9 The London Councils' annual report on the pressures facing school place planning in London ('Do The Maths 2018' (November 2018)) confirms that while the shortfall for mainstream school places across London has reduced, the demand for places for pupils with Special Educational Needs and Disabilities (SEND) is increasing exponentially. To address the Special Educational Needs requirement, Havering's Commissioning Plan for Education Provision 2019-2023, the SEND projections published, projected the total number of Havering children and young people to have an EHC plan in in 2018/19 to be 1406, however by November 2018 that number had been exceeded, to 1489. As of April 2017, 125 of Havering's children aged 5-16 with a statement or EHC plan were placed out of borough (44 of these are high-cost placements). Of these, most pupils had Autistic Spectrum Condition (ASC) and Social, Emotional, and Mental Health (SEMH) needs.
- 10.2.10 The Commissioning Plan for Education Provision – 2019-2023 was updated in autumn. This plan sets out the number of school places, both mainstream and specialist that Havering will need to provide over the next two years to ensure that the borough's statutory responsibility is met. The plan identifies that within Havering there is a significant number of primary and secondary school age pupils with Special Educational Needs (SEN), specifically Moderate Learning Difficulties (MLD) and Autism or Autistic Spectrum Disorder (ASD) for whom there is currently no appropriate provision. The plan concluded that there is an urgent need to increase SEND places in Havering to make places available for 60 places free school to meet the needs of children and young people aged 3-16 years who have complex or severe ASD or social, emotional and mental health difficulties. The applicant has advised

that the as of April 2019, Havering were sending over 60 pupils with Education Health Care Plans (EHCP) with ASC and SEMH needs to out-borough provisions at a cost of over £1.5m to meet the needs of those children.

- 10.2.11 Havering's educational strategy recognises the benefits of co-educating and co-locating SEND students with mainstream students in order to enhance the educational opportunities for pupils and ensuring that SEND students have the opportunity for integration in to mainstream education. Co-location means that students have the opportunity to spend time within the mainstream school, according to ability and some may even be able to move across to the mainstream school permanently. A further advantage is that co-location with an existing school offers significant economies of scale. Due to budgetary constraints and the number of SEND places that are required, it is not considered possible to provide this type of facility on a standalone site.
- 10.2.12 The proposed school will only accommodate pupils with an Education and Health Care Plan (EHCP) which identifies the educational, health and social needs of children and young people aged up to 25 who need extra support. The EHCP also sets out the additional support needed. These pupils are either currently attending schools which are inappropriate for their needs, or attending schools out of the borough at great expense, with the result that they are travelling for significant periods each day.
- 10.2.13 Pupils with MLD and ASD are uniquely placed among SEND pupils to benefit from an SEND school co-located with an existing mainstream school. Their primary environment is one designed for their needs, but for specific subjects and for limited periods they have the opportunity to attend mainstream lessons, and thus benefit from a broader curriculum than an SEND school can usually provide. Co-location also provides SEND pupils with controlled, limited periods in which they can acclimatise to busier, noisier, more challenging environments
- 10.2.14 Recognising that co-location of the proposed SEND school on the site of an existing secondary school is the optimum solution, in terms of both the educational interests of the pupils and the economies of scale associated with co-location, an assessment of 41 alternative sites including all existing secondary schools within the borough was undertaken to assess which of the existing schools or sites were capable of accommodating the proposed new SEND school. This assessment is set out in full within the Alternative Site Assessment report which forms part of the submitted planning statement and supporting documents. The site selection analysis concluded that the majority of the sites were severely constrained in terms of area and did not have sufficient land to accommodate the Department for Education guidance on space standards for special schools (Building Bulletin 104), or have been declared unavailable.
- 10.2.15 Of the 41 sites assessed in Stage 1 of the assessment (in addition to the initial two sites identified by the Council as part of the initial bid (which were then subsequently disregarded)), five were identified as potentially more suitable and large enough to accommodate a new SEND school without the significant loss of playing fields. These were the sites at Cottons Park, Balgores Lane Playing Field, Bridport Avenue, Lilliput Road Open Space and St Edward's Academy. The full assessment submitted with

the application sets out the assessment in detail, however, to conclude, no alternative non-Green Belt sites that meet the school needs and which can be considered available, deliverable and suitable have been identified to date.

- 10.2.16 Each of the first four sites above is either designated as Green Belt and/or another policy designation or is earmarked for a secondary school and were therefore not considered suitable or were sequentially less preferential. As a result of the site selection analysis only St Edwards Academy is considered to be available and capable of physically accommodating the requirements. Although land forming part of St Edwards Academy also sits within the Green Belt, it is free from more restrictive designations or policy constraints as well as having a number of other benefits. In regard to the other Green Belt sites, the St Edwards Academy site is predominately previously developed land which the other Green Belt sites are not, therefore making it more sequentially preferable. It is also of sufficient size, available, deliverable and has the additional co-location benefits of being next to another school.
- 10.2.17 The proposed school would be a SEND free school managed by the Trust who manage the existing St Edwards Academy and co-located on the same site, will mean pupils can share facilities, which brings benefits in terms of educational opportunities and economies of scale for both schools.
- 10.2.18 On the basis of the submitted assessment, it is considered that a compelling case has been demonstrated, in terms of the pressing need for a new SEND school within the borough, the clear need for this to be co-located on the site of an existing secondary school, and that no other school sites are considered to be suitable or available to accommodate the proposed development in this context. It is considered that substantial weight should be accorded to this need, in the context of the strong policy support for the provision of education facilities to meet the demands of a growing and changing population to enable greater educational choice, as embodied within Policy 17 of Havering's Local Plan, which states that proposals for educational uses in the Green Belt, including the expansion of existing schools may be considered as very special circumstances where it can be robustly demonstrated that there are no suitable alternative sites within the appropriate education planning area and there is a demonstrable need for additional school places; the London Plan and the NPPF.
- 10.2.19 It is therefore necessary to assess the extent of the harm to the Green Belt that would result from the proposed development, and balance this against the weight to be accorded to the case for the new school.

Impact on openness

- 10.2.20 In terms of the harm to the Green Belt, whilst the proposed development would clearly represent inappropriate development within the Green Belt, it's siting and design has been developed with the specific objective of minimising impact on the openness of the Green Belt. It is for this reason that the proposed building has been sited adjacent to the existing school buildings, on an area occupied by existing hard standing. A wide range of design options were considered as part of the design process, which are summarised within the submitted design and access statement. This included options for siting the building on alternative locations within the school grounds, and alternative forms in terms of the scale and massing of the school building. Options for a single storey building were considered, however these were discounted given the

additional footprint which would result in further incursion in to the Green Belt. There are a range of existing two storey buildings including three and four storeys, which form part of St. Edwards Academy. The building has been designed with a flat roof to minimise its bulk and massing, and whilst it would project slightly further south than the existing school buildings, the extent of this projection in to the open playing fields has been minimised as far as practicable. The use of materials in natural tones and palettes and the proposed use of soft landscaping around the site has also sought to minimise impact on openness in this regard.

- 10.2.21 In spatial terms, as described above, the footprint of the proposed school building does not extend beyond the existing previously developed land. Although there is a slight encroachment on to the undeveloped part of the Green Belt to accommodate part of the parking, this is considered to be minimal.
- 10.2.22 In assessing the harm to the Green Belt, it is also necessary to consider the extent to which the proposed development conflicts with the five purposes of the Green Belt, namely i) to check the unrestricted sprawl of large built-up areas, ii) to prevent neighbouring towns merging into one another, iii) to assist in safeguarding the countryside from encroachment, iv) to preserve the setting and special character of historic towns; and v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. In relation to i) the building would be sited on an existing area of hardstanding which lies between the existing 2/3 storey school buildings and Westland Playing Field, and therefore sits largely within the envelope of existing buildings, and as such minimises the extent of any encroachment in to the open Green Belt. In terms of ii) the swathe of Green Belt within which the application site lies, extends between the main built up area of Brooklands to the east and the residential housing which lie to the west of in the borough and Barking and Dagenham. As such, the proposed development would not result in the merging of neighbouring towns. In terms of iii), as in relation to ii), the swathe of Green Belt within which the application site lies sits between two built up areas and does not represent open countryside. In terms of iv) this area of Green Belt does not surround a historic town, and as such is not directly applicable in this instance, and in terms of v) the site of the proposed development comprises an area of hardstanding which will be redeveloped, and lies at the edge of the defined urban area notwithstanding that the school site is washed over by the Metropolitan Green Belt designation.
- 10.2.23 In its formal Stage 1 response, the GLA identified that .."*the site currently comprises an area of hard standing of the adjacent St Edward's Academy School and part of the overspill parking for the previously approved new football ground for Romford Football Club (permission now lapsed). Although the red line boundary includes part of the Westlands Playing Field, the proposed footprint of the school building will only cover the existing hardstanding area. It can therefore be considered as previously developed land.*"
- 10.2.24 In relation to the proposed MUGA sports pitch, it is recognised that it's hard surfacing, protective fencing, and likely floodlighting columns have the potential to impact on the openness of the Green Belt in this location. However, it is also recognised that the school site is afforded substantial screening from the wider area of Green Belt of which it forms part, by reason of the mature woodland and vegetation which surrounds it. The pitch together with associated fencing and floodlights would be sited

on an area which currently comprises the grass playing fields/pitches, and in this context and for the reasons set out above in relation to the five purposes of including land within the Green Belt, it is considered that the MUGA pitch would preserve the openness of the Green Belt and not conflict with the purposes of including land within it. As such, it is considered that this element of the proposed development falls within exception b) of paragraph 149 of the NPPF and does not represent inappropriate development in the Green Belt.

Loss of playing field land

- 10.2.25 Whilst the proposals would result in the loss of a portion of the Westlands Playing Fields and incursion on to land which forms part of the school's existing outside playing fields, it is proposed to mitigate this loss through the provision of a new MUGA pitch to compensate for the loss. The proposed MUGA pitch has limited use than the existing grass pitch and is susceptible to flooding and is, as a result, potentially unusable for much of the spring and winter.
- 10.2.26 NPPF paragraph 99b states that existing open space and playing fields should not be built on unless the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Sport England has submitted comments in relation to this application, and consider that it should be considered against exception 5 of its playing fields policy, namely that *"the proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field"*
- 10.2.27 London Plan Policy G4 and Local Plan policy 29 identifies that proposals that increase or enhance the provision of sports and recreation facilities will be supported; whereas those that result in a net loss of sports and recreation facilities, including playing fields should be resisted.
- 10.2.28 The applicant has put forward the use of the hall of the new school for community use and related sporting events and the introduction of floodlighting for the MUGA pitch to allow for use by members of the public outside school hours.
- 10.2.29 The GLA in their Stage 1 response notes that information regarding the change in playing field provision is addressed within the application submissions and whilst there will be a net loss, it is considered to be marginal at a quantitative loss of approximately 1.7% of Westlands Playing Field, when considered against the wider education and community benefits to be gained, and provides qualitative improvements, including indoor provision, and as such is considered to meet the relevant Sport England exception test. Further stating that the Havering Playing Pitch Strategy and Action Plan 2016 also identified the need to resolve the issues of Romford Football Club expanding in Westlands Playing Fields. The principle of loss of a playing pitch is therefore accepted by the extant permission
- 10.2.30 In view of the above policy considerations and the facilities to be provided it is considered that although there is an overall loss of playing fields, this loss has been mitigated by the provision of the sports hall and a MUGA albeit not a full sized pitch

- 10.2.31 The provision of these facilities, that includes, 5 a side sports pitch is considered to be an uplift in terms of the quality and quantity of pitch provision on the site, with no significant loss of sports pitches. The sports / main hall will provide further indoor courts and associated facilities which again is an uplift of the existing facilities. This provision will therefore meet any deficiency and ensure pupils and the community benefit from high quality sports and the sport related benefits this facility will deliver both for the school and wider community. This is therefore considered to meet the policy requirements sufficiently, resulting in no significant net loss of pitches and further provision of sports and recreational facilities, as required under the above policies. This therefore accords with the fundamental principle of the policies which seek to resist any loss of playing pitches and playing fields.
- 10.2.32 It is likely that if an approval were to be recommended conditions could be imposed to control the use of the site for community purposes in the form of a community use agreement and further details of the proposed surface water drainage system, their fencing and hours of use of the site could all be dealt with by condition.
- 10.2.33 It is concluded in light of the above that the provision of the MUGA pitch would provide enhanced sports provision in both quality with a surface that is available throughout the year.

10.3 **Design, character and setting of the building**

- 10.3.1 The NPPF 2021 attaches great importance to the design of the built environment. Paragraph 126 states *'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.'*
- 10.3.2 The NPPF states (paragraph 134) that "development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents". Paragraph 133 states that 'applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community' and this is reinforced in London Plan Policy D2, which seeks the involvement of local communities and stakeholders in the planning of large developments.
- 10.3.3 Policies D3 and D4 of the London Plan require that buildings, streets and open spaces should provide a high quality design response that has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion, appearance, shape and form. This is echoed in Policy 26 of the Local Plan.
- 10.3.4 The school building has been designed to present its frontage to London Road, with the main entrance located on this north east elevation. Whilst the building would be set back within the site by at least 110m from the boundary with London Road, it would sit farther away to London Road than the existing school buildings and would be clearly visible within the street scene albeit at a distance. Its two storey scale would sit comfortably in the context of the range of existing two, three and four storey school

buildings. Whilst there would be roof mounted plant, this has been screened to minimise its visibility from London Road and from the wider Westlands Playing Fields.

- 10.3.5 The building features a strong and clear public entrance which will ensure that the building delivers a legible form. In terms of its scale and massing the proposed development represents an efficient use of the land whilst still sitting comfortably within the site. It is considered that the building's design, scale and massing and site layout would result in a scheme which reflects its context and the function of the building without resulting in an overly dominant form of development when viewed from surrounding public vantage points.
- 10.3.6 The scheme proposes a varied palette of high quality sustainable materials combined with a contemporary form of detailing, which would create a well-articulated and visually interesting building of an appropriately high standard for this location. The three principal elevations which would be visible within the street scene (the north elevation facing London Road, the west and the south elevations which would be visible across the playing fields) would feature materials comprising a natural palette which responds to the local context and creates a character for the school. The predominant material is timber, with a teal colour used on the front elevation of the site, with unstained wood colours on the teaching areas to give a natural appearance. The proposed entrance will have an orange board to add a burst of colour making it welcoming and legible, and the remaining internal colours are autism and SEMH friendly. The external shelters on the ground floor classroom provides opportunity for outdoor learning. Both of these are supported.
- 10.3.7 The teaching accommodation is over two-storeys, with Reception, Key Stages 1 and 2 situated on the ground floor and Key Stages 3 and 4 situated on the first floor. Additionally, the building will accommodate multiple therapy rooms, group rooms and calm spaces throughout, and soft-play and sensory rooms on the ground floor. There is also a food tech room on the ground floor.
- 10.3.8 In this context, it is considered that the proposed building would achieve a high standard of design that is both sensitive to its Green Belt location and minimises its visual impact through its scale and use of natural tone materials, whilst also representing a clear identity and defined character for the school building. The proposal accords with the stated national, London and local plan policies.
- 10.4 **Impact on the residential amenity of neighbouring occupiers**
- 10.4.1 London Plan Policy D6 *Housing quality and standards* states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to privacy, overshadowing, wind and microclimate.
- 10.4.2 Policy 26 of the Local Plan requires all development to achieve a high standard of privacy and amenity, and sets out a number of criteria for the consideration of the same. In addition, development should be designed, orientated and positioned in such a way to minimise overlooking between dwellings.
- 10.4.3 A distance of at least 95m would be maintained between the rear elevations of the residential properties on London Road and the nearest part of the proposed school building. As such it is not considered that there would be any unacceptable impact in

terms of overlooking or loss of privacy for these properties. Given the orientation and height of the building in relation to the intervening distance to the closest residential properties on London Road Lane, it is not considered that the proposed development would result in any unacceptable loss of light or overshadowing in this regard.

10.4.4 Issues in terms of air quality, noise impact, and the impact of any proposed floodlighting are addressed below.

10.4.15 Giving consideration to the scale of the proposal, its siting and the separation distance from neighbouring properties, it is considered that the development would not have an unreasonable impact on the residential amenity of neighbouring properties. In this respect, no objections are raised with regard to London Plan Policy D6, Local Plan Policy 29 or the NPPF.

10.5 **Access, the impact on the highway network and parking provision.**

10.5.1 London Plan policy T4 states that 'when required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance'. Policies T2 and T5 relate to healthy streets, the provision of cycle and pedestrian friendly environments, whilst policy T6 relates to parking standards. Policies 23 and 24 seeks to 'secure enhancements to the capacity, accessibility and environmental quality of the transport network which reinforces the aims of London Plan Policy T4, which aims to contribute to modal shift through the application of parking standards and implementation of a Travel Plan. These objectives are broadly consistent with a core principle of the NPPF that planning should seek to secure high quality design.

10.5.2 Policy 17 relates to education, with the following noted with regard to transport:-

“Development proposals for childcare facilities, primary and secondary schools and further or higher education facilities will be supported where it can be demonstrated that the proposal:

ii. Is located within the community it is intended to serve and is accessible by public transport, walking and cycling.”

10.5.3 Vehicular access into the site is provided from London Road, where there is an access established by the secondary school on site. This leads to a parking court towards the north and western corner of the site. The London Road access point would remain unchanged, and continue to serve the visitor car park, which also leads to the entrance gates for the new school and would also provide access for servicing, refuse and delivery vehicles. 4 bays for pick-up/drop-off purposes including for light vehicles, are to be located to the front. This drop off would be able to accommodate approximately 4 light vehicles at any one time. Dedicated cycle and scooter parking would also be provided off this area, with a covered and lockable shelter for 10 cycles

Parking provision

- 10.5.4 The school will accommodate 60 pupils of both primary and secondary age, supported by 45 staff. The school will accommodate both primary and secondary school aged pupils.
- 10.5.5 A total of 18 onsite parking spaces will be provided; 2 of which will be designated for disabled users and two for visitors. 3 of the staff parking spaces will also be provided with active EV charging infrastructure. It is proposed that the staff car park would also be used to provide car parking associated with the wider community use of the school facilities outside of school hours.

Trip generation

- 10.5.6 It is proposed that the start and finish times of the SEND school would be staggered to avoid coinciding with those of the existing St Edwards Academy. The SEND School will be working with the existing school to maintain this arrangement. The proposed operating hours of the SEN school would therefore be staggered with the existing school, resulting in an associated staggering of trips associated with the drop off and pick up of pupils.
- 10.5.7 The transport statement includes an assessment of the likely number of additional vehicle movements that could be generated by the proposed SEND school. The site has the capacity to attract 78 movements in the AM peak hour and 65 in the school PM peak hour. During the network PM peak hour, a further nine trips are anticipated. It is understood that the majority of pupils will reside within the Borough of Havering itself, with a small number likely to travel from neighbouring boroughs. For the purposes of this assessment, it has been assumed that 90 per cent will reside in Havering and 10 per cent in either Barking and Dagenham or Redbridge. It is assumed that an equal proportion of pupils will reside in each of these boroughs.
- 10.5.8 In the interest of a robust assessment, an average occupancy rate of two pupils per LEA vehicle has been assumed. In conjunction with parent pick-up and drop-off, this would generate up to 33 vehicles at the site at the beginning and end of the school day. With regard to staff, it is envisaged that 25 staff members will travel to the site by car; however not all of them will do so during the morning and afternoon peak periods. Based on data from staff travel surveys undertaken at a number of Kent schools.

Cycle Parking

- 10.5.9 With regard to cycle parking, for primary and secondary schools, long-term parking should be provided at a rate of one space per eight FTE staff plus one space per eight students. A further one space per 100 students should be provided as short stay parking. Two sets of five cycle lockers will be provided, to be secure by design gold standard. The site is developed in such a way that allows for the expansion of these facilities if demand dictates through the Travel Plan monitoring process.
- 10.5.10 The submitted Transport Assessment has been reviewed by the Highway Authority who consider that overall, the level of additional traffic generated by the proposed SEN school would have negligible impact on the capacity of London Road and the surrounding road network.

Travel plan

- 10.5.11 An interim school travel plan has been submitted in support of this application. This has been reviewed by the Highway Authority who consider that the identified initiatives are mainly targeted towards the travel patterns of pupils. Given that the predicted mode share for single car occupancy trips is relatively low. However, the Travel Plan will be updated to reflect the actual pupil and staff mode shares, along with suitable targets and actions. As such, a more detailed travel plan is to be secured via condition, requiring its submission and approval prior to first use of the new school building.

Conclusion

- 10.5.12 The Highway Authority raises no fundamental objection to the proposed development subject to the imposition of planning conditions requiring: i) submission of details of cycle parking and its subsequent implementation, ii) submission of a scheme for the management of the car parking areas and its subsequent implementation, iii) submission of details of the management of the gated access to the pick-up and drop-off parking area serving the new school, iv) submission of details of the layout, surfacing and drainage of the parking areas to be laid out, and its subsequent implementation, v) submission of a revised travel plan and its ongoing implementation and review, and vi) submission of details of electric vehicle charging points and their subsequent installation. Conditions are proposed in this regard.
- 10.5.13 In response to the points raised within the GLA's Stage 1 response, no formal comments have been received from TfL. Conditions to address the issues raised in the Stage 1 response are recommended above.
- 10.5.14 As such, the proposed development is considered to result in no unacceptable highway impact, and will ensure appropriate provision to encourage sustainable modes of transport.

10.6. **Flood Risk and Development**

- 10.6.1 Local Plan Policy DC48 states that development must be located, designed and laid out to ensure that the risk of death or injury to the public and damage from flooding is minimised, whilst not increasing the risk of flooding elsewhere and ensuring that residual risks are safely managed.
- 10.6.2 The Council's Strategic Flood Risk Assessment maps show that the site is not located in a higher risk flood zone London Plan policies SI12 and SI13 state that development should utilise sustainable urban drainage systems (SUDS) and should aim to achieve greenfield run-off rates and this objective is reiterated in Policy DC48.
- 10.6.3 Having consulted the Lead Local Flood Authority – the Council flood risk and drainage management team, no objections have been raised with regard to the impact on surface water flooding either on site or further afield and the proposed development has been found to be acceptable in principle, subject to suggested planning conditions including appropriate mitigation (including adequate warning procedures) can be maintained for the lifetime of the development, in accordance with Local Plan Policy DC48, policies SI12 and SI13 of the London Plan and the NPPF.

10.7 Sustainability

10.7.1 Paragraphs 155 - 158 of the NPPF relate to decentralised energy, renewable and low carbon energy. Chapter 9 of the London Plan contains a set of policies that require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions, where the residential element of the application achieves at least a 35 per cent reduction in regulated carbon dioxide emissions beyond Part L Building Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. . Specifically, Policy SI2 sets out an energy hierarchy for assessing applications, as set out below:

- 1) *Be lean: use less energy*
- 2) *Be clean: supply energy efficiently*
- 3) *Be green: use renewable energy*

10.7.2 Core Policy DC48 requires development proposals to incorporate sustainable building design and layout.

10.7.3 The applicant has submitted a Sustainability and Energy Report. The energy report sets out that a zero in regulated CO2 emission is predicted to be achieved onsite.

10.7.4 The Energy Strategy sets out the following approaches to be taken to achieve the London Plan CO2 target reduction:

“Be Lean” – sustainable design and construction measures will be used to improve air tightness, high performance glazing and efficient lighting. The Be Lean case has assumed that heating is provided by gas boilers with an efficiency of 91%. Under the Be Lean scenario the development shows savings of 5.96 tonnes CO2 / annum, which is a 18.47% saving over the Part L2A 2013 Baseline;

“Be Clean” – highly efficient, individual low NOx boilers (The site is not situated near to an existing or planned district heat network, and on-site CHP and community heating is inappropriate for a development of this nature); and

Be Green” – the installation photovoltaic panels (PV) at roof level and the use of air source heat pumps. An on-site photovoltaic array has been proposed on the roof area of the school. The proposed array will be required to achieve an annual generation of 69,710 kWh/annum.

10.7.5 Whilst a detailed design will be necessary to demonstrate that the proposed development will achieve the overall CO2 reduction, it is anticipated that through the above measures the proposed Havering SEND school will achieve an estimated minus 8,267 kg/CO2 per annum through the Be Lean, Be Clean and Be Green stages of the hierarchy, which represent a 126% cumulative saving beyond the baseline carbon emissions. The results show that, using the specification outlined in this report the proposed Havering SEND school will achieve an estimated minus 8,267 kg/CO2 per annum through the Be Lean, Be Clean and Be Green stages of the hierarchy, which represent a 126% cumulative saving beyond the baseline carbon emissions. The applicant is proposing to achieve zero regulated carbon on-site; this is supported.

BREEAM

- 10.7.6 BREEAM is an assessment using scientifically based sustainability indices that covers a range of environmental issues. Its categories evaluate energy and water use, health and wellbeing, pollution, transport, materials, waste, ecology and management processes. Non domestic commercial buildings are rated and certified on a scale of 'pass', 'good', 'very good', 'excellent' and 'outstanding' and is carried out by independent, licensed assessors. It aims to reduce the negative effects of construction and development on the environment. The Havering Sustainable Design and Construction guide requires all developments to provide a 'very good' or 'excellent' rating.
- 10.7.7 The application submission confirms that the building has been designed to achieve the BREEAM 'very good' rating. This represents a high level of sustainable design and construction. A condition is recommended to seek a Post Construction BREEAM Review Certificate showing that a rating of at least "Very Good" has been achieved following completion.
- 10.7.8 In conclusion, the development would accord with development plan policies. To ensure compliance with these standards, a condition is attached requiring a post occupation assessment of energy ratings, demonstrating compliance with the above policies.

10.8 **Noise and Air Quality**

Air Quality

- 10.8.1 The proposed development is located within a designated Air Quality Management Area (AQMA) due to high concentrations of nitrogen dioxide and particulate matter. Paragraphs 112 & 186 of the National Planning Policy Framework and The London Plan policies SI1, SI3, T61 seeks to ensure that development proposals minimise increased exposure to existing poor air quality and make provision to address local problems of air quality, particularly within air quality management areas (which the site is) and where the development is likely to be used by large numbers of people vulnerable to poor air quality (such as children or older people). Development proposals should be at least air quality neutral and should not lead to further deterioration of existing poor air quality.
- 10.8.2 An Air Quality Assessment has been submitted in support of this planning application to assess the air quality impacts of the proposals. The assessment concluded that following the successful implementation of the suggested mitigation measures during the construction phase, the residual effects of construction dust and emissions from construction activities upon the local area and sensitive receptors although adverse, will be temporary and not significant. And that during the operational phase, the operational assessment has demonstrated that the proposals will have a net positive impact upon existing air quality concentrations compared to the current use. Air quality for future residents is predicted to be good.
- 10.8.3 With regards air pollution from traffic, the report concludes that once the proposed development is complete and operational, the principal air quality impact is likely to be emissions from the increased traffic on local roads surrounding the site. An

assessment of operational phase impacts has been undertaken using the latest version of the ADMS-Roads atmospheric dispersion model. And as per the EPUK-IAQM guidance, the impact of the development on annual mean NO₂, PM₁₀ and PM_{2.5} concentrations at existing sensitive receptor locations was assessed as 'negligible', it is considered that the development will have an insignificant effect on local air quality. Therefore, it is not considered that any specific mitigation measures will be required for operational phase.

- 10.8.4 The Environmental Health Officers has advised that the Air Quality Assessment for the construction phase has shown that the site is Low to Medium risk, in relation to dust soiling and Low risk in relation to human health effects. Based on this risk assessment, appropriate mitigation measures need to be set out in a Dust Management Plan, to ensure the air quality impacts of construction and demolition are minimised. This is to be secured by mainly pre-commencement conditions.
- 10.8.5 The applicant submitted a detailed Air Quality Assessment report in response to the GLA. GLA has confirmed that the additional info submitted in response to the queries raised in the Stage 1 have now all been satisfactorily resolved subject to condition. This is to be secured by conditions.

Noise

- 10.8.6 London Plan policies D13 and D14 that that new noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage noise impacts for neighbouring residents and businesses.
- 10.8.7 The conclusions of the noise impact assessment are considered satisfactory. The assessment focuses primarily on internal noise design criteria issues which are considered under the Building Regulations and fall outside the scope of Environmental Health legislation.
- 10.8.8 The report indicates that there is no significant variant in noise level in the measurement data between day and evening periods. The assessment of noise impact from community use demonstrated that during day-time period there is a low probability of adverse impact at noise sensitive receptors. The Environmental Health officer has advised that the noise report submitted in support of the application used the wrong criteria in assessing plant noise emission, and therefore, recommended pre-commencement conditions should be attached and enforced. As such, subject to conditions, is it considered that proposal would not have undue impact on neighbouring residential properties.
- 10.8.9 Based on the above and with the suggested mitigation measures in place, it is considered that the proposed development would accord with national, regional and local planning policies in relation to noise and air quality

10.9 **Archaeology and Contamination**

Archaeology

- 10.9.1 The application site sits on the archaeologically productive Hackney Gravel and lies within Areas of Archaeological Potential connected with the excessive cropmarks in

the area and on the line of the London Colchester Roman Road corridor. No Archaeological Desk Based Assessment has been submitted with the application in accordance with current planning policy. Historic England (Greater London Archaeological Advisory Service, GLAAS) has advised that the site lies in an area of archaeological interest, and that if planning permission is granted, the applicant should improve knowledge of assets and make it public. And in keeping with advice on the Westlands Playing Field next door, a condition is appropriate to manage archaeology. As such, a two stage archaeological condition is recommended to provide an acceptable safeguard to ensure the development accords with the guiding principles of the NPPF, Policies HC1 of the London Plan, 34 of the Havering Local Plan and the Heritage SPD with regards to archaeology and cultural heritage matters.

Contaminated Land

10.9.2 A Phase 2 Geo-Environmental Site Investigation report has been submitted as part of the application submission, which is accompanied by an addendum report relating to groundwater and gas monitoring that has been undertaken. The submitted reports have not identified any contaminant linkages that require further investigation or remediation. However, the Council's Environment Health Officer has recommended that a standard unsuspected contaminated land as a precautionary condition be imposed on the basis of the information provided, to ensure that there is no risk of contamination in accordance with Havering Local Plan Policy 34 and the NPPF. The condition is recommended.

10.10 **Ecology / Greening and Biodiversity**

10.10.1 Havering Local Plan Policy 30 states that the Council will protect and enhance the Borough's natural environment and seek to increase the quantity and quality of biodiversity by ensuring developers demonstrate that the impact of proposals on protected sites and species have been fully assessed when development has the potential to impact on such sites or species. The policy goes on to state that it will not permit development which would adversely affect the integrity of Specific Scientific Interest, Local Natural Reserves and Site of Importance for Nature Conservation, except for reason of overriding public interest, or where adequate compensatory measures are provided. The Council has also adopted the 'Protecting and Enhancing the Borough's Biodiversity' SPD (2009). This requires ecological surveys of sites to be carried out prior to development.

10.10.2 The presence of protected species is a material consideration, in accordance with the Framework (paragraphs 179-182), Natural Environment & Rural Communities (NERC) Act 2006 (section 40), Wildlife and Countryside Act 1981, Conservation of Habitats and Species Regulations 2010 (and amended 2012) as well as Circular 06/05.

10.10.3 The proposals are relatively small-scale; however, they are adjacent to a stream which runs into Westland's Rough SNCI. Therefore, it is extremely important to ensure that strict pollution prevention methods are adhered to during the construction process and that the stream- and riparian habitat- is protected in the long-term and does not provide a conduit for pollution to enter the nearby SNCI. A Preliminary Ecological Appraisal has been submitted as part of the application submission. This found no evidence of roosting bats 1km of the site within the last ten years. No potential roosting features (PRF) were identified within any of the trees within the site. Therefore, the trees were deemed to be of 'Negligible' potential for roosting bats.

- 10.10.4 A Baseline Ecological Appraisal has been undertaken based on the results of an Extended Phase 1 Habitat Survey of the site, desk based studies and species surveys for Badgers, Great Crested Newts and Bats as well as general faunal activity observed during the course of survey work. A Phase 1 Walkover ecological survey was undertaken. This identified that there are no European or internationally protected sites within 1 km including the Sites of Importance for Nature Conservation due to the size and distance from the site.
- 10.10.5 The submitted documents have been reviewed by the Council's Ecology Consultant who advised that the submitted landscape plans show that the area of existing scattered scrub adjacent to the stream as wildflower grassland, and some of this area is within the red line and some is outside of it. It is unclear why one habitat will be completely removed and replaced by another; that the Preliminary Ecological Appraisal should be updated to reflect this. The consultant has recommended that the existing habitat is retained and enhanced, rather than removing and replacing it.
- 10.10.6 The design and access statement details a series of ecological enhancements, with a total area of 0.23ha of habitat creation, through the green foot, amenity grassland, wildflower meadow, native and wildlife attracting shrub planting, a stream and scattered shrub. The proposed habitat creation, with the retention of the existing habitats to the eastern boundary, will deliver a 12% Biodiversity Net Gain to the site, therefore exceeding the minimum 10% recommendation and satisfying the London Plan.
- 10.10.7 The Ecology Consultant has recommended that the mitigation measures identified in the Preliminary Ecological Appraisal should be secured and implemented in full. This is necessary to conserve and enhance protected and Priority species particularly bats, nesting birds, and reptiles.
- 10.10.8 The Consultant has recommended a number of conditions that should be imposed to ensure that the development undertakes appropriate ecological enhancement on site. Subject to these conditions, it is considered that the development would be acceptable in this regard, and as such complies with Policy 30 of the Local Plan and the relevant paragraphs of the NPPF.

Impact on trees

- 10.10.9 An arboricultural impact assessment and method statement have been submitted as part of the application submission. This identifies that the site has a mixed species of large, mature trees in good condition, medium sized, middle-aged trees in good condition and smaller, younger trees in good condition across the site. This assessment has been undertaken in accordance with BS 5837:2012 Trees in relation to design demolition and construction recommendations and confirms that 39 individual trees and 2 tree groups require removal to facilitate the scheme. The Landscaping consultant has advised that proposed level of tree planting and, subject to further details coming forward regarding species and installation size, would be sufficient and acceptable. The arboricultural method statement sets out the proposed protective measures and contains a construction method statement to ensure suitable protection is afforded to all existing trees. This has been reviewed by the Council's Ecology and Landscaping consultants who raises no objection on this basis. A

condition is recommended to ensure that the proposed works are carried out in full accordance with the arboricultural method statement

Financial and Other Mitigation

- 10.11 Due to the nature of use (education), the Havering Council's Community Infrastructure Levy is not applicable.

Equalities

- 10.12 The Equality Act 2010 provides that in exercising its functions (which includes its role as Local Planning Authority), the Council as a public authority shall amongst other duties have regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the 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

- 10.13 The proposal is primarily for use by children with disability and special needs for their education and wellbeing. The proposal provides facilities/benefits for this group in particular.

12 Other Planning Issues

Designing Out Crime

- 12.1 Policy D11 of the London Plan states that Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area. The above mentioned policy piece together reasoned criteria's for applicants to adopt the principles and practices of Secure By Design (SBD). More detail on the implementation of the above policy is provided from LBH's SPD on '*Designing Safer Places*' 2010, this document which forms part of Havering's Local Plan was produced to ensure the adequate safety of users and occupiers by setting out clear advice and guidance on how these objectives may be achieved and is therefore material to decisions on planning applications.
- 12.2 The submitted Design and Access Statement has referenced a management and security strategy, benefits of this approach provide a sense of security to its teachers and pupils and the local community and discourage antisocial behaviour. The statement outlines that the design has been developed with SBD principles in mind following subsequent consultation response by the Designing out Crime Officer. Points raised include improved internal and outside areas (secure access and access control), communal, play area and areas for community use, lighting, refuse collection and bicycle storage areas. The Designing Out Crime Officer has raised no fundamental objection to the proposal subject to conditions.

Floodlighting

- 12.3 The application is supported by an external lighting impact assessment which assesses the impact of the proposed external lighting for the new school. External lighting will be provided to the amenity areas of the development at ground and first floor levels to provide a safe and secure environment for the movement of pedestrians around the building, whilst minimising levels of obtrusive light.
- 12.4 Following negotiations with Sport England, it is proposed to install floodlight for the MUGA court. No detail has been provided at this stage. The installation of floodlighting is essential to ensure the MUGA can be used by members of the public outside school hours and most importantly, during the winter months, A condition requiring the floodlighting be designed to accord with the Institute of Lighting Professionals (ILP) Guidance Notes for the Reduction of Obtrusive Light, to ensure that obtrusive light is kept to a minimum is recommended.

13 **Conclusions**

- 13.1 The benefit of further educational development on this existing school site is supported by the relevant policies of the development plan and the guidance set out in the NPPF. In balancing the weight to be accorded to the case for the new school, taken in the context of the harm to the Green Belt that would result from the proposed development, it is considered that very special circumstances exist which clearly outweigh the harm to the Green Belt by reason of inappropriateness and any other harm. The need for the SEND school is acknowledged as is the conclusion that existing SEND sites cannot be extended or redeveloped.
- 13.2 The proposed artificial pitch is considered to meet one of the exception tests within Sport England's playing fields policy and as such will mitigate the loss of playing field land resulting from the proposed development. Securing the wider community use of the artificial pitch and associated facilities would be necessary in this context to justify this loss of playing field land, and therefore a community use agreement would need to be secured via condition to make the development acceptable in planning terms
- 13.3 The proposed school building would achieve a high standard of design that is both sensitive to its Green Belt location and minimises its visual impact through its scale and use of materials, whilst also representing a clear identity and defined character for the school building. It represents a high quality design and is an appropriate design response in terms of the character and appearance of the area.
- 13.4 In terms of impact on parking and the highway, it is considered that the proposed development would afford a suitable level of on-site staff parking provision to prevent overspill on to surrounding residential roads, and that there would be no unacceptable impact on the operation of the local highway network. Subject to compliance with the recommended conditions, the proposal is considered to accord with relevant policy and guidance.
- 13.5 The decision to grant planning permission has been taken having regard to the National Planning Policy Framework (2019), the policies of The London Plan (2021) and Havering Local Plan 2021, having regards to all relevant material considerations,

and any comments received in response to publicity and consultation. It is therefore recommended that planning permission be granted.