



Havering
LONDON BOROUGH

Strategic Planning Committee

7 December 2023

Application Reference:	P2071.22
Location:	The Seedbed Centre, Unit E5 Davidson Way
Ward	St Albans
Description:	Outline planning application with all matters reserved for the demolition of existing buildings and structures and redevelopment to create a 2 Form Entry School of up to 4 storeys including all associated works
Case Officer:	Richard Byrne
Reason for Report to Committee:	In the public interest as this application is linked with P2072.22 which is also on this Committee Agenda.

1.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 1.1 This report considers the principle of a new school on land at Rom Valley Way in Romford, the site known as The Seedbed Centre. Outline planning consent is sought with all matters reserved for the demolition of existing buildings and structures and redevelopment to create a 2 Form Entry School of up to 4 storeys including all associated works.
- 1.2 The application site sits within a wider masterplan area where outline permission (application P2072.22) is being sought for the redevelopment of the adjoining site for a mix of uses built over 3-12 storeys to include up to 840 residential units (Class C3), 3,000sqm light industrial (Class E) and general industrial (Class B2) uses, retail / restaurant / cafe up to 200sqm, medical facility (Class E) up to 378sqm, associated landscaping, public realm, parking, refuse storage and other associated works.

- 1.3 All matters are reserved, the outline planning application (OPA) sets out the following principles for the outline part of the site:
- Demolition of one building which predominantly occupies the southern part of the site. However the demolition is linked with the wider removal of buildings within the masterplan area which extends south to the River Rom;
 - Erection of a new two form entry primary school with a maximum floorspace of 3781 square metres.
- 1.4 The following report will set out the material planning considerations and give a detailed review of the proposed development. Furthermore, this report will consider the potential environmental impacts, which can be positive or negative, as addressed by the submitted Environmental Impact Assessment and the accompanied Environmental Statement which covers the application site and the wider masterplan area.
- 1.5 The approach to site layout, height and massing represents an acceptable approach given the location of the site and how it intrinsically links with the masterplan area. This initial scale and design of the proposals were reviewed by the Council's Quality Review Panel on 15 February 2022 and by Members of the Strategic Planning Committee on 21 July 2022.
- 1.6 The recommended conditions and Heads of Terms would secure future policy compliance by the applicant on the site and ensure any unacceptable development impacts are mitigated.
- 1.7 Officers consider the proposal to be acceptable, subject to the planning obligations and conditions.

RECOMMENDATION

- 1.8 That the Committee resolve to GRANT outline planning permission subject to:

The prior completion of a legal agreement pursuant to Section 106 of the Town and Country planning Act 1990 (as amended) and all other enabling powers to secure the following planning obligations:

- Travel Plan;
- Carbon offset;
- Employment and Training; and,
- Legal Costs, Administration, Indexation and Monitoring.

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

Conditions

1. Outline Time Limit
2. Submission of reserved matters
3. Approved Drawings, including parameter plans
4. Biodiversity and Landscape Management Plan (Including construction phase and biodiversity enhancements of the scheme which exceeds the minimum 10% over the biodiversity net gain target, recommendation in line with the London Plan)
5. School Design Code
6. Materials
7. Site Levels

8. Accessibility statement and management plan
9. Secured by Design
10. Delivery and Servicing Plan
11. Boundary Treatments
12. Energy Statement Compliance
13. External Lighting Scheme
14. Noise Protection
15. Air Quality
16. Site investigation – Land Contamination
17. Contaminated Land
18. Flood Risk / Surface Water Drainage
19. Sustainable Drainage Systems (SUDs)
20. Car Parking and Servicing Plan (including disabled parking provision, pick up and drop off parking area serving the new school, and the enlarged staff car parking area)
21. Parking Management Plan
22. Electrical Charging Points
23. Cycle Storage
24. Demolition, Construction Management and Logistics Plan
25. Storage and collection of refuse
26. Urban Greening Factor
27. Accordance With Ecological Appraisal Recommendations
28. Use Class School only
29. Odour control
30. Circular Economy Statement, monitoring report and completion report
31. Whole Life-Cycle Carbon Assessment
32. GLA 'Be Seen' energy monitoring requirements
33. Surface water on the highway
34. Future management and maintenance of the proposed streets
35. Archaeology

2.0 SITE AND SURROUNDINGS

- 2.1 The application site is located between the eastern side of Rom Valley Way and the River Rom. The site straddles the northern section of The Seedbed Centre, Davidson Way and southeast corner of the car park for Homebase retail store to the north. The site itself is occupied by industrial buildings associated with The Seedbed Centre, hardstanding for car parking, a carriageway and footways.
- 2.2 To the north of the site is a Homebase retail warehouse with ancillary parking. North of the Homebase site on Old Church Road (the Ring Road) is the Bridge Close site with proposed development currently at pre-application stage (PE/00213/2017 – a mixed use development including up to 1,070 homes, a school and commercial units). To the east of the site, on the other side of the River Rom is the local listed building 'Page Calnan at 222-226 South Street and residential properties such as Victorian Villas on South Street and also the apartment block – The Maltings. This area is predominantly suburban 2 to 3-storey residential dwellings and 4-storey apartments fronting South Street, with car parking and back gardens on the eastern bank of the river.
- 2.3 To the west, is the Rom Valley Way, a busy four lane highway. In between Queen's Hospital and Rom Valley Way is the former Ice Rink Site which has an extant permission for (Block A) for a total of 146 residential units (Class C3), retail/restaurant unit (Class E), medical or neighbourhood centre (Class E(e), F2); energy centre (sui generis); parking, access from the southern roundabout and temporary road access arrangements and Outline permission for site preparation for erection of six blocks (Blocks B to G) of up to 826 residential units (Classes C3) including up to 223 later living/extra care/residential units (Classes C2/C3);

medical/hospital facility (Class C2/E(e)), flexible retail and cafe space (Class E), gym facilities for residents and NHS Staff (Class E), Medical/neighbourhood centre (Class Ee/F2); energy centre, basement, associated landscaping, car parking, refuse storage and other associated works with all matters reserved)..

- 2.4 The Seedbed Centre is identified as a Locally Significant Industrial Site (LSIS) and falls within the Romford Strategic Development Area and London Plan Opportunity Area. The masterplan site is irregularly shaped 3.10ha, with the school site measuring 0.22ha. The site is located to the south of Romford Town centre and some 500m from Romford Railway Station. There is a PTAL rating for the site of 6a (Excellent), where 0 indicates extremely poor access to public transport and 6b indicates excellent access to public transport.
- 2.5 The River Rom corridor to the east of the site is located within Flood Zone 2/3a. There are no listed building at or near the site and it does not fall within a Conservation Area; however, the site does fall within Havering Archaeological Priority Areas (1).
- 2.6 The site slopes down from the east to the west and north to the south, with maximum levels of difference of approximately 1.5m. There is a drop in levels from the site down to the River Rom of between 1 and 1.5m.

3.0 DESCRIPTION OF PROPOSAL

- 3.1 This application solely relates to the provision of a 2 form entry school which is intrinsically linked to the outline application P2072.22 on the Seedbed Centre site, the Rom Valley Retail Park and also to the future redevelopment of the Homebase site to the north.
- 3.2 This application has been submitted separately due a difference in land ownership. The applicant considers that it is not necessary for the joint landowner to enter into a Section 106 pertinent to matters relating to the residential, commercial and other planning obligations that would normally make a development acceptable. As such by limiting this application to a new school it keeps any requirements as a result of a legal agreement solely with the applicant.
- 3.3 The application has been submitted as an outline application with all matters reserved relating to Access, Appearance, Layout, Landscaping and Scale. The scheme proposes the demolition of existing buildings and structures and redevelopment to create a two Form Entry Primary School of up to 4 storeys.
- 3.4 The primary school is proposed to provide 2,225 square metres (Gross Internal Area - GIA) of education related spaces which comprises teaching, resource areas, halls, dining, PE staff and storage areas. A further 1,162 squares metres (areas include toilets, kitchen facilities, circulation space and internal walls) are included which results in a gross internal area of up to 3,387 square metres.
- 3.5 External teaching and play space is shown indicatively to be placed on the top storey of the school building. Ground floor external circulation space is shown on the north side of the built form. A further external space is shown on the southern side which acts a gathering place for students, teachers and parents. Although not publicity accessible it integrates with the wider masterplan area.

4.0 PLANNING HISTORY

- 4.1 A planning history search revealed an extensive planning background, as this application seeks the complete re-development of a particular site, the specific historical permissions issued to the land in question are not considered overly relevant in this instance, except for:

- P0891.87 – Outline application for the development of part for residential purposes and the remainder for non-food retail warehousing together with ancillary car parking and servicing. Approved 23rd September 1987.
- E0031.18 – Certificate of Lawfulness for the existing use of eight units as light industrial (Class B1c). Approved 12th December 2018.
- E0030.18 - Certificate of Lawfulness for the existing use of eight units as Office (Class B1a). Approved 12th December 2018.
- P1226.20 – Outline planning application incorporating details of access to the site and with all other matters reserved for a comprehensive phased mixed-use development as set out in the Development Specification (August 2020) comprising demolition of existing buildings and structures and redevelopment of the site for a mix of uses comprising business and employment uses, (within Use Classes B1(a), B1(b), B1(c) up to 7,804sqm); residential dwellings (within Use Class C3 up to 1,072 units); energy centre (Sui Generis use up to 801sqm); retail and restaurant uses (within Use Classes A1, A2 and A3 up to 339sqm); community uses (Use Class D1); health centre (Use Class D1 up to 1,761sqm); together with public open space including the provision of a riverside walkway; inclusion of basement space, storage; associated car and cycle parking; alteration of existing pedestrian and vehicular access and means of access and circulation within the site; together with new private and public open space and site preparation works. Application withdrawn May 2021.

Pre-Application Discussion

- 4.2 Prior to the submission of this planning application, the applicant has engaged with LBH planning and design officers over 2 years for the masterplan site and school site. The applicant has entered into a Planning Performance Agreement (PPA) with the Council to formalise the pre-application stage of engagement in respect of the proposals. Pre-application discussions have taken place with Council officers, TfL, the Greater London Authority (GLA) and other statutory consultees under the terms of the PPA.

QRP - 15 February 2022	
QRP Comments	Officer comments
The panel is generally supportive of the proposed location of the primary school, but has some concerns about its deliverability since it is reliant on the success of another application on the adjacent site (the Homebase site). Splitting the site between neighbouring landowners will create potential delivery issues for the two site owners, as well as the local authority, and this should be reviewed carefully.	The deliverability of the school would be secured through a S.106 Legal Agreement given Havering Council first option to develop the site. Should that not be the case the Legal Agreement would secure an off-site financial contribution.
The panel notes that multi-storey primary schools can be successful, but require careful treatment: the school proposed for the nearby Bridge Close site could be a positive example on which to draw. Given that this will be an outline application, the applicant should test the proposition and satisfy the planning authority it can deliver a satisfactory outcome.	The Council is satisfied that a multi-storey can operated successfully on this site.

<p>The panel feels that, if the layout requires amendment to accommodate the uses on site and the redistributed massing, a stand-alone school could be successfully located in the south east corner of the site. This would have the advantage of minimising overlooking and overshadowing, as well as allowing for more generous dedicated public space. The panel notes that this might require a 'school street' approach to be taken to the central spine road.</p>	<p>Following further discussions of all parties it was agreed that the proposed location for the school is the most suitable.</p>
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SPC – 21 July 2022	
SPC Comments	Applicant remarks
<p>What will be the parking provision?</p>	<p>The London Plan does not specify parking standards for educational (school) use, however there is a requirement for at least one on/off-street disabled persons parking bay, which will be provided. The parking proposals reflect the council's Strategy & Concept Design for Rom Valley Way and are supported by the GLA. Active travel (walking and cycling) will be promoted, as will the use of nearby public transport.</p> <p>An option has been shown within P2072.22 that there is potential for three further parking spaces to be sited close to the school.</p>
<p>Will there be at least 100m running space?</p>	<p>The school building is not designed in detail at this stage. The team has looked at several precedent examples where primary schools have been delivered on urban plots that have playgrounds/pitches at multiple levels (including the roof), which cater for all types of sport and outside play.</p>

4.3 Following previous Pre-App and QRP comments, the design team attended post submission meetings 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.

5.0 Environmental Impact Assessment (EIA)

5.1 The development falls within the thresholds set out in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), whereby an EIA is required for the purposes of assessing the likely significant environmental effects of the development. A Scoping Opinion was issued by the Council on the 3rd July 2021, commenting on the approach and methodology for assessing the impact of the following environmental topics:

- Transport;
- Air quality;
- Noise and vibration;
- Ground conditions;
- Water;
- Ecology;

- Wind;
- Landscape, townscape and visual amenity;
- Socio-economic;
- Archaeology;
- Waste management; and
- Climate change and renewable energy.

5.2 An Environmental Statement (ES) has been submitted as a supporting document to the application, which includes environmental information under the above topics. Officers are satisfied that this complies for the purposes of Regulation 3 of the EIA Regulations and detailed consideration of this information is undertaken in the below appraisal sections.

6.0 **Community and Stakeholder Engagement**

6.1 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. This included:

- Newsletters (4272 copies of the newsletter were posted to residential properties and businesses) providing information about the proposed development and directions to a dedicated website where they could see more information;
- Emails were sent to local politicians, providing them with details of the proposed development and offering them a virtual presentation of proposals;
- The applicant conducted their own consultation process, of which 248 people completed feedback forms. 231 of these came through the website and 17 of these came through physical feedback forms at the public consultations on 14th and 16th May.
- Survey of business tenants on the Romford Seedbed Centre (April 2022);
- Online public consultation (May 2022);
- Physical public exhibition events held at the Seedbed Centre, Romford. 14th May, 10am – 2pm and 16th May, 2pm – 8pm;
- Consultation contact phone number, email address and Freepost address – a way for residents, businesses, and other local stakeholders to raise questions, provide feedback and request more information;
- Hospital trust engagement (June 2022);
- Article in local Romford Recorder, including follow up article post consultation (May and June 2022); and
- Strategic planning committee developer presentation (July 2022).

6.2 The applicant's response to the issues raised in the course of the public engagement contained in the SCI unsurprisingly relates more to the wider mixed use scheme and so those comments are not listed here. However, the SCI does acknowledge that there was general support for the proposed primary school.

7.0 **CONSULTATION RESPONSE**

7.1 A summary of the consultation responses received. It is noted that in GLA's response to P2072.22 it was stated this application for the proposed school is not referable.

Anglian water

- No comment

Thames Water

- No objection – advice provided on proximity to public sewers and surface water drainage

London Fire Service

- No additional fire hydrants are required
- Provides advice regarding access and manoeuvrability
- Provision of fire hydrants and other facilities must be in accordance with the current version of Building Regulations and Approved document B

Environment Agency

- No objection

Street Naming and Numbering

- This application will require to be street named and numbered

Historic England – (GLAAS)

- Notes that there is a potential for riverside and settlement archaeology
- Development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation
- Considers a two-stage archaeological condition would provide acceptable safeguard.

LBH Waste and Recycling

- No domestic waste associated with the application;
- Should provide suitable waste collections, provides guidance

Place Services (Heritage)

- The existing buildings on the site of the proposed development are not of any heritage value. Therefore, I have no objection to the demolition of these.
- The proposed four storey school building may appear in the backdrop of the locally listed Page Calnan Building at 222 South Street. However, it is considered this would not lead to considerable harm to the setting of the heritage asset. Therefore, no objection is raised on the grounds of built heritage.
- Considered the impact on the locally listed buildings at South Street. Subject to the detail height and massing, the development may be visible from these locally listed buildings but it is unlikely that the proposed school buildings would feature in views of these within which they are appreciated. As such, the scheme would not affect their significance.

Place Services (Ecology)

- We are satisfied that there is sufficient ecological information available for determination of this application. No fundamental to the proposal subject to applicable conditions.

Officer comment: Noted and appropriate condition and informatives suggested.

LBH Education

- Application is not clear regarding what condition the school site will be in when it is handed over to the Council for construction. This needs to be clarified. Would expect the site/land to be made ready prior to handover to the Council so that construction could commence immediately.
- The space earmarked for the school needs to be compliant with DfE space standards for primary schools as per Building Bulletin 103: Area guidelines for mainstream schools. The space identified needs to be large enough for a 2FE primary school as per BB103.

LBH Environmental Health

- No objection recommend conditions to secure the submission of a Phase I and II site

investigation and if containments found a Phase III report followed by a verification report. Furthermore, a condition to assess any unforeseen contaminants found followed by a verification report to remediate the site.

LBH Highways

- Following a careful review of the documents provided to the Highway Authority as part of the above planning application, no significant adverse effect upon the Public Highway should result from this proposal, should it gain benefit of Planning Permission.
- Accesses should be sealed and to be drained away from the highway in a bound material for a minimum of 5m back from the existing footway. The vehicular access shall be laid out and constructed in accordance with the Havering Council construction specification. Surface water from private roads/ driveways areas must not discharge onto the public highway, and appropriate intervention must be provided. Please demonstrate a method at the boundary of the private and public highway of the access.
- Subject to this, the future reserved matters application to provide access details and car parking and turning arrangements that meets Havering parking standards.

National Gas

- No National Gas Transmission assets affected in this area

Police Designing Out Crime Officer

- No objection to the proposed development, subject to the specific concerns stated in Section 3 being addressed, and a Secured by Design (SbD) planning condition being attached to the permission as detailed in Section 4. This is to focus the minds of the developer towards security and crime prevention, in turn ensuring that such measures are not value engineered out at a later stage of the construction process.

Romford Civic Society

- It is noted that the proposed school is very close to the proposed public walkway by the river, and wonder whether guidance has been sought on children's safeguarding issues arising from this? We note that these issues could probably be resolved were the school to be set further into the centre of the site and a broader buffer with paths provided along the edge of the river, as suggested in our comments on the proposal at the Seedbed Centre.
- It is strongly felt that the architects should be retained for the whole duration of the design and build of the school, until it has been completed, to give advice on materials and other design issues which will inevitably arise during the process.

8.0 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 177 notification letters were sent to neighbouring properties regarding this application.
- 8.3 6 neighbour representations (objection) have been received via the Council's consultation process.
- 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:

- Increase traffic on the local road network and inhibit access to the hospital for traffic and ambulances
- Loss of privacy for houses on South Street
- Proposed school should not exceed two storeys in line with existing buildings
- Unclear of the condition of the school site when it is handed to the Council for construction
- The space for the 2e school needs to be compliant with DfE space standards as per Building Bulletin 103
- Overbearing impact to South Street
- Will ruin the special heritage interest of the 230-268 South Street which are listed on the Havering Heritage Asset Register (buildings of local heritage interest);
- Reduction of sunlight and shadowing of garden and properties, especially during the winter months
- Support advocated for the proposed school, however, it should be three storeys not up to four storeys;
- Discrepancy identified adjacent to the River Rom. Plans show the area as greenery but is currently flat concrete. Proposed school would go right up to the concrete edge.

9.0 RELEVANT POLICIES

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

National Design Guide

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
- 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
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.

Optimising Site Capacity: A Design-led Approach LPG (2023)

Sets out how the design-led approach, set out in Policy D3 of the London Plan, should be applied. This approach is the process of setting site-specific design parameters and codes for development sites to provide clarity over the future design.

Characterisation and Growth Strategy LPG (2023)

Provides information on how to carry out a borough or neighbourhood-wide character assessment (or study). This assessment should be used to inform a borough or neighbourhoods growth strategy, setting out how an area will change in the future. This includes identifying if and where there are locations where tall buildings may be appropriate.

Play and Informal Recreation SPG (2012)

This document sets out guidance on the quality of play space. Principles of this document are relevant to the school site.

Accessible London SPG

The Supplementary Planning Guidance (SPG) on Accessible London provides advice on

implementing inclusive design principles effectively, and on creating an accessible environment in London. This SPG has particular emphasis on the access needs of the capital's disabled and older people.

Havering Local Plan (2021)

The following policies should inform design of the proposed development:

- 1 – Romford Strategic Development Area
- 7 - Residential design and amenity
- 16 - Social Infrastructure
- 17 - Education
- 23 - Transport connections
- 24 - Parking provision and design
- 25 – Digital Connections
- 26 - Urban design
- 27 – Landscaping
- 28 - Heritage assets
- 29 - Green infrastructure
- 30 - Nature conservation
- 32 – Flood Management
- 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 needs to be read in combination with newer mayoral guidance:

- Sustainable Design and Construction (2009)

10.0 **MATERIAL PLANNING CONSIDERATIONS**

10.1 The main planning matters raised by the application for consideration are:

- Principle of the Development
- Standard of Design and Layout and Impact on Views
- Impact on the amenity of neighbouring land uses
- Highway Matters and Sustainable Transport
- Effect on designated and non-designated heritage assets;
- Sustainability and Energy Efficiency
- Ecology and Biodiversity
- Urban Green Factor
- Flood Risk and Drainage
- Environmental Issues
- Sustainable Waste Management
- Accessibility and Inclusivity
- Secure by Design
- Other Planning Issues

Principle of Development

- 10.2 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.
- 10.3 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. Furthermore, to ensure that good quality education and childcare facilities to meet demand and offer educational choice London Plan Policy S3 requires boroughs to confirm that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach.
- 10.4 Havering Plan Policy 17 advocates proposals for primary schools and other education facilities will be supported where it can be demonstrated that the proposal:
- i. Contributes to the delivery the Council's agreed Commissioning Plan for Education Provision and the Schools Expansion Programme;
 - ii. Is located within the community it is intended to serve and is accessible by public transport, walking and cycling;
 - iii. Is of a high quality design and provides a safe environment; and
 - iv. Provides, private, secure and safe outdoor amenity and playing space in line with Government building guidelines, which is located away from busy roads.
- 10.5 Where a new school is proposed, the Council will require facilities for early years' provision to be included on site where there is an identified local need.
- 10.6 The Children and Young People Education Place Planning Plan for the period 2023 sets out how Havering Council seeks to ensure there is sufficient capacity to meet demand for early years, primary, secondary, post-16, special school places and alternative provision places across the borough. This plan sets out the number of school places, both mainstream and specialist that Havering will need to provide over the plan period to ensure that the borough's statutory responsibility is met. The plan identifies that within Romford, Primary demand is driven by the new housing planned for this area. There is a need to ensure that the new schools planned to help meet the school place demand from the new housing are delivered at the right time.
- 10.7 There are seven primary schools in the Romford area. Of these, four have been expanded and one is a new school. All the primary schools in the Romford area that can be expanded, have expanded to their full capacity. There is no scope to further expand the existing schools to deliver the additional places required.
- 10.8 On national offer day 2021, only 1% of Romford primary school places were unfilled, thus demonstrating the existing pressure on schools within the Romford planning area. While it is

true that the birth rate in Havering has started to decline since 2015/16, the birth rate in Romford remains high, with the 2018/19 birth rate standing at 684, which is higher than the Romford birth rate in 2015/16 and earlier. This high birth rate locally indicates that demand for school places in the Romford area is likely to remain high. Further housing which may come forward in the future within the area will create additional demand for school places in addition to this.

- 10.9 The proposed two form primary school that will be located adjacent to the proposed new residential development of the Seedbed and Homebase sites and close to existing residential areas will provide the facilities to meet an identified local educational need. The delivery of the school would be controlled through the legal agreement for this site and that relating to the wider Seedbed site and future residential redevelopment of the Homebase site. The development takes an inclusive design approach where access is level and would be in accordance with the Equality Act 2010/Part M requirements.
- 10.10 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.

Standard of Design and Layout and Impact on Views

- 10.11 The NPPF states (paragraph 134) that 'permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or 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 GG1, which seeks the involvement of local communities and stakeholders in the planning of large developments.
- 10.12 Policy D3 of the London Plan encourage the optimisation of sites through a design-led approach, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the development design, as described in Policy D4 of the London Plan. This is echoed in Policy 26 of the Local Plan.
- 10.13 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.
- 10.14 The outline application is submitted with all matters reserved for future determination; the detailed design, layout and elevational form of buildings is not before the Council. Given this application is linked to the outline application for the development of the remaining Seedbed Centre and Rom Valley Way Retail Park the design response has focused on the school and the wider aspiration of the masterplan area. The combination of the individual and holistic approach seeks to explain the approach to design and layout within the key documents:

Parameter Plans – These set design parameters in terms of site layout, maximum building height and provision of open space.

Design Code – Sets out detailed design guidance for future phases on matters such as massing and scale, frontage, access, orientation, amenity, architectural character and materials.

Indicative Plans – Provide an indication of how the development could come forward. These demonstrate that sufficiently scaled and proportioned internal spaces can be achieved in line

with BB103 guidance from the Department of Education.

Design and Access Statement – Provides a narrative as to the vision, objectives, design principles and key design elements of the scheme, including masterplanning and site layout, open space, character areas and landscaping.

Scale, Massing and Design within wider area and masterplan site

- 10.15 The wider Masterplan area has been considered principally against London Plan Policy D9 and Havering Local Plan 1 given the proposed heights shown on the parameter plans.
- 10.16 The proposed mixed use development within which the school will be cited has undergone extensive Pre-App and Post-Submission discussion with Officers. The relatively high density of the masterplan area represents a significant change in the character of the area, and therefore led to a strong focus on heights and massing during these discussions. Negotiations have led to a fairly substantial reduction in density (since early stage of Pre-App meetings), to help the scheme to integrate more comfortably with the surrounding area thereby adopting a design-led approach to the scheme to establish an appropriate layout and massing, prioritising the delivery of new public realm and communal space and enhancing connectivity between the town centre and along the River Rom. The scheme is comprised of six mixed use blocks arranged around a central spine road and park / open space areas that will provide a space for the local community that is sheltered from the activity in the surrounding road network.
- 10.17 The proposed school would have a maximum height of 33.40 metres AoD which equates to a maximum of four storey which would sit in the north of the masterplan site area.
- 10.18 The proposed school echoes the approach of the masterplan direction where the development would sit within the context of the wider development envelope. Taking a holistic approach the gradual lowering of the building height towards the north staggers the built form. Given the school site is adjacent to the edge of the masterplan area the lowered height also assists with the built form edge with the River Rom.
- 10.19 The external space to the north of the building provides a soft recess edge between the built form and the site boundary. The area on the southern side of the building provide a gathering space normally associated with educational building that integrates with the northern edge of the masterplan area integrating with the adjacent open space.

Architectural expression

- 10.20 Greater flexibility at Reserved Matters stages for the school is likely to be required, therefore the parameter plans and design code are less prescriptive than information provided for housing and commercial uses in the wider outline (P2072.22). However, indicative proposals, and design guidance on materials and architectural detailing demonstrate a high standard of design. Officers are satisfied that the information provided is sufficient to allow a high quality scheme to come forward and Reserved Matters stages.
- 10.21 Overall, in terms of detailed architectural design, it is considered that the proposal has been carefully considered and subject to the conditions outlined above, would achieve a design that enhances the character of the buildings and the surrounding area.
- 10.22 Other than future confirmation of materials as outlined above, it is considered that a high quality development could be achieved and as such, the height and massing of the scheme would be acceptable.

Quality of public realm and external spaces

- 10.23 A key update to the massing strategy of the wider scheme during the PPA process was to reduce the height of blocks neighbouring the school to achieve improved daylight/sunlight and reduce overshadowing. This means it has been demonstrated that the school playground complies with BRE guidance to achieve a minimum of 2 hours sunlight on 21st March.
- 10.24 Given the relatively high density nature of the proposal, the scale of external play space is limited, and likely to fall below minimum requirement set out by the BB103 guidance from the Department for Education. Therefore, it is important that the playgrounds set out in the outline application represent a minimum quantum of provision that is maintained at Reserved Matters stages. The proximity to the main play spaces in the wider outline scheme help to mitigate issues relating to the scale of school playgrounds.
- 10.25 The proposed school will be approached through the wider outline proposal submitted alongside this scheme (P2072.22). This provides high quality routes for pedestrians and cyclists. Access to play space, and planting within the public realm help to create a positive environment for children, carers, and staff using these routes.

Impact on the amenity of neighbouring land uses

- 10.26 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.
- 10.27 Policy 7 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. 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.

Effect on Homebase Retail Store

- 10.28 Part of the application site is within the ownership of the land associated with the retail store. The supporting documentation for this application shows there is an intention to develop the site. In the absence of adverse comments from the adjacent landowner it is recognised that the land to the north is intended to be developed in the future. Nevertheless, the presence of the proposed school would not necessarily effect the retail store itself, mainly of Davidson Way and part of the existing car park. Given access can still be obtained from the north it is considered unlikely the proposed school would have a significant effect to withhold permission for the development of the site.
- 10.29 Any future development proposal of the land to the north would have to be considered with the presence of the proposed school. An eventual design under a reserved matters application could be developed to ensure the land to the north is not prejudiced.

Effect on 230 – 274 South Street

- 10.30 The row of Victorian houses sit in a prominent position on South Street which have been substantially extended over the course of time. Taking into account the rearward extensions, the properties still benefit from elongated rear gardens that face towards the application site and the wider masterplan area.

- 10.31 The average distance between the northeast boundary of the application site and the rear of South Street is circa 67 metres. There is significant separation, with a wooded area, River Rom channel and a set back of at least 8m of the proposed school to the River Rom. 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 South Street, it is considered that the proposed development would not result in any unacceptable loss of light or overshadowing in this regard. Submitted daylight sunlight studies demonstrate that no significant harm in terms of overshadowing would be caused as a result of the school proposal.
- 10.32 Taking into account the scale of the school proposal at 4 storeys, 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.

Highway Matters and Sustainable Travel

- 10.33 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.
- 10.34 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."*
- 10.35 The applicant is aware that the Council have over the last few years been undertaking consultations and trials for several schools across the borough in regard to school street schemes in order to make it easier and safer for children to walk and cycle to school. The school street scheme proposes to restrict or close the roads to non-essential vehicles around the entrance to the school at opening and closing times. For these existing schools it is also the aim to reduce the number of journeys made to the school by car and improve air quality by reducing the level of pollution children are exposed to. These restrictions would not prevent residents and their visitors leaving the street during these times, as only access/waiting is restricted for the purpose of keeping the area free of traffic for children's health and safety.

Trip generation

- 10.36 The school will accommodate 400 pupils of primary age, it is intended to serve the wider masterplan development, with a small proportion coming from surrounding residential areas, all of which are expected, and will be encouraged to, arrive on foot, by cycle or public transport.
- 10.37 The transport statement supporting the application includes an assessment of the trip generation, which given the location of the school and the vast majority of the pupils coming from the adjacent housing developments the car journeys would be minimal with the number of trips largely on foot with a total 2way trip of 106 during the AM and 3 during the PM (as schools generally are closed to a pupils around 3.30 before the PM peak is calculated).
- 10.38 The submitted Transport Assessment has been reviewed by the TfL who indicates a net reduction in vehicle trips when compared to the existing vehicle trips recorded in the 2018 and 2022 traffic surveys. Given it is relatively car free and with the level of additional traffic generated by the proposed school it is considered the proposal would have negligible impact on the capacity of London Road and the surrounding road network.
- 10.39 Vehicular access to the school is proposed to be restricted to parents and carers to help discourage car use. The implementation of a school street to further restrict access to the wider area was discussed at PPA meetings and should be considered for implementation at Reserved Matters stages.

Parking

- 10.40 There are no specific car parking standards associated with a primary school within the London Plan. The proposed primary school includes one blue badge car parking spaces, given it is located within a PTAL area of 6a.
- 10.41 The applicant has provided an indicative option drawing showing that 3 spaces could be provided for use of the school in the masterplan area. Coupled with a planning condition for details of how deliveries and servicing would be undertaken ensures space for staff and deliveries to be made to the school. Furthermore, should staff drive there is the availability of nearby town centre parking.

Travel plan

- 10.42 An interim school travel plan has been submitted in support of this application. This has considered that the identified initiatives are targeted towards the travel patterns of staff and pupils, given that the scheme is car free. 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.

Cycle Parking

- 10.43 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. Details of cycle parking can be secured alongside the submission of the reserved matters to ensure that the correct quantum is provided within the site and it is well integrated into the design of the scheme.
- 10.44 The Local Highway Authority raises no fundamental objection to the proposed development subject to the imposition of planning conditions requiring the prevention of water onto the

highway, method of construction statement, management of street during construction until entering of a Section 38 Agreement. Conditions are proposed in this regard.

- 10.45 As such, the proposed development is not considered to result in an unacceptable highway impact, and will ensure appropriate provision to encourage sustainable modes of transport.

Effect on Locally Listed heritage assets

- 10.46 The proposed four-storey school building would appear in the backdrop of the locally listed Page Calnan Building at 222 South Street. However, the Council's Heritage consultant has advised that given the scale of the school building proposed this would not lead to considerable harm to the setting of the heritage asset.
- 10.47 Nos. 230 – 268 (Even) South Street have been locally listed for their architectural and historical value. The row of Victorian semi-detached dwelling houses in the 'Villa' style backs onto the River Rom and is within proximity and setting of the application site. The development may be visible from these locally listed buildings but it is unlikely that the proposed school buildings would feature in views of these within which they are appreciated. This is considered to not lead to considerable harm to the setting of the heritage asset.
- 10.48 The proposed development is in outline form, however, given the parameters are for the proposed school to be up to four storeys it is considered that there is sufficient information available to reach a view on whether the scale would affect the non-designated heritage asset.
- 10.49 As such it is considered the proposed maximum of four storeys is considered acceptable against Local Plan Policy 28 and the NPPF in respect of the effect on the non-designated heritage asset.

Sustainability and Energy Efficiency

- 10.50 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
- 10.51 The applicant has submitted a Sustainability and Energy Report which covers the school site and the wider masterplan area that details the likely energy demands of the proposed development and proposed energy supply measures. The Statement appraises policy and reviews project specific targets in relation to matters such as energy, water, resource conservation, waste management, biodiversity and pollution control.
- 10.52 The Energy Strategy sets out the following approaches to be taken to achieve the London Plan CO2 target reduction, Be Lean, Be Clean and Be Green.
- 10.53 A detailed design will be necessary to demonstrate that the proposed development will achieve the overall carbon dioxide reduction, it is anticipated that through the above measures

the proposal will achieve an overall CO2 reduction of 48% across domestic and non-domestic uses.

- 10.54 The energy report sets out that an overall 48% reduction in regulated CO2 emissions, predicted would be achieved onsite across domestic (50%) and non-domestic uses (25%). 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.

Ecology and Biodiversity

- 10.55 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.
- 10.56 The application is accompanied by an Environmental Statement (ES), which includes consideration of the ecological and biodiversity interests on the site and on the masterplan site. Whilst the proposal does not appear to affect any nationally designated geological or ecological sites or landscapes or have significant impacts on the protection of soils, it is important that the enhancements proposed for the site are maximised in terms of their benefit for biodiversity. Consideration should be given to wildlife friendly landscaping which integrates the school site and masterplan site to the south given they are intrinsically linked to help enhance the ecological biodiversity of the site. Consideration should also be given to the incorporation of bat boxes and species specific bird boxes on or built into the fabric of new buildings.
- 10.57 Place Services (Ecology Consultant) is satisfied that there sufficient ecological information available for determination of this application. This provides certainty of the likely impacts on designated sites, protected and priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.
- 10.58 Biodiversity enhancements, including for the River Rom, have been recommended to secure net gains for biodiversity, as outlined under Paragraph 174d of the National Planning Policy Framework (2023). The Biodiversity Net Gain Technical Note across both sites indicate that the proposal as submitted resulted in a gain of 6.13 habitat units (60.71% increase), a gain of 0.31 in hedgerow units (73.79% increase) and deliver 2.7 River Units offsite. The scheme has changed since these calculations were undertaken.

Urban Green Factor

- 10.59 Policy G5 of the London Plan sets an Urban Greening Factor (UGF) target score of 0.4 for residential and 0.3 for commercial. It is considered in this instance a 0.3 UGF target would be in the spirit of Policy G5. It has been shown that 0.33 UGF could be achieved within the site through a range of urban greening measures, including tree planting, green roof and wall.

Flood Risk and Drainage

- 10.60 Guidance under the NPPF seeks to safely manage residual risk including by emergency planning and give priority to the use of sustainable drainage systems. London Plan Policy SI12 states that Development proposals should ensure that flood risk is minimised and mitigated while Policy SI13 outlines that Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. Local Plan Policy 32 will support development that seeks to avoid flood risk to people and

property and manages residual risk by applying the Sequential Test and, if necessary, the Exception Test as set out in the NPPF.

- 10.61 Whilst the wider application site includes the river Rom on its eastern boundary, which is within Flood Zones 2 and 3, the area where the school is located is within Flood Zone 1 and therefore at low risk of flooding. In respect to surface water flooding the school site is also at low risk. However, to ensure a precautionary approach the proposed school building would be nominally raised above ground levels to afford protection in event that 'medium risk' is exceeded. The proposed surface water strategy for the Site has been developed to utilise sustainable drainage systems (SUDs) to attenuate surface water at source and reduce the risk of downstream flooding as far as possible. To mitigate the risk of flooding from surface water and anticipated effects of climate change, the Development will incorporate SUDs to manage storm water and reduce pre-development discharge rates. The surface water will be attenuated through geocellular storage before being filtered into the River Rom.
- 10.62 Overall, it is considered that the proposed SUDS measures are satisfactory and these are to be secured via condition. As such, it is considered that the proposal would not increase flood risk and therefore accords with policies of the London Plan, SI12 and SI13 of the London Plan and Local Plan Policy 32.

Environmental Issues

Air Quality

- 10.63 Paragraph 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. 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. Havering Local Plan Policy 33 reiterates the importance in improving air quality by supporting development which is at least air quality neutral, optimises the use of green infrastructure, delivers measures to support active travel to reduce emissions meets the targets for carbon dioxide reduction in the London Plan and minimises emissions from construction.
- 10.64 The proposed development is located within an area of poor air quality which suffers from high concentrations of nitrogen dioxide. Therefore it has been designated as an Air Quality Management Area (AQMA). The application is supported by an air quality impact assessment which identifies that the main likely effects on local air quality during demolition and construction relate to dust and to exhaust emissions from construction vehicles. During operation it is considered unlikely there would be a significant effect to air quality from vehicle movements and have projected 730 vehicle movements for the school annually which is well below the transport emission benchmark (approx. 159k on the basis of the proposed floor space) given its high PTAL rating.
- 10.65 To safeguard against additional unnecessary impacts to air quality, conditions are recommended to mitigate future impacts during the construction and operational phases of the development, including details to protect the internal air quality of the buildings to accord with Policy 33 of the Local Plan.

Noise

- 10.66 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. Havering Local Plan Policy 7 echoes this approach by advocating that developments do not result in unacceptable level of noise, vibration and disturbance.

- 10.67 Noise and Vibration was considered in the ES. Potential impacts throughout the demolition and construction stage were anticipated to include the noise and vibration due to demolition and construction works activities and noise from Heavy Goods Vehicles (HGV) movements along the local road network. It is considered given the urban context there would be a level of noise and vibration associated with the construction phase of the development. However, through appropriate planning conditions the effect can be minimised to an acceptable level and given it relates to the construction would be relatively short lived.
- 10.68 In respect of the operation phase noise could arise from the building, the introduction of fixed plant and building services, use of the building and associated outdoor spaces and changes to road traffic noise levels along the local road network.
- 10.69 It is considered using a combination of the results of digital noise modelling and glazing and ventilation strategies for the School Development to accompany a reserved matters application could mitigate the emission of external noise and achieve the indoor ambient noise guidance levels in BS 8233, ProPG, and BB93 and to confirm the suitability of the site for school occupation.
- 10.70 In regard to road traffic noise levels along the local road network during the operation phase the ES considered the effect to have a negligible effect. It is noted that the site achieves a PTAL rating of 6 and is well connected to means of public transport reducing the need for individual car travel. In combination with the masterplan area it is acknowledge that traffic generation will be significantly less than the current site which inevitably would see a reduction of noise generated by traffic. Therefore given the school would be closely guided by a travel plan promoting active travel and is close to areas of residential areas levels of traffic would be discouraged which result in the lower level of noise expected.
- 10.71 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 policy 34 in relation to noise.

Contaminated Land

- 10.72 A Phase I Geo-Environmental Site Investigation report has been submitted as part of the application submission. The submitted report has identified a number of potential pollutants that may be active upon development of the site. These are predominantly associated with the site's historical and current commercial use. Made ground is also likely beneath the site any contaminant linkages that require further investigation or remediation.
- 10.73 The Council's Environment Health Officer has recommended that the submission of a Phase II site investigation and if containments found a Phase III report followed by a verification report would ensure that risk of contamination is appropriately mitigated which would accord with Havering Local Plan Policy 34 and the NPPF.

Sustainable Waste Management

- 10.74 London Plan Policy SI7 seeks to minimise waste and encourage the reuse of and reduction in the use of materials. The Mayor seeks to ensure that there is zero biodegradable or recyclable waste to landfill by 2026 and meet or exceed the municipal waste recycling target of 65 per cent by 2030; and achieving a minimum of 95% reuse/recycling/recovery rate for construction and demolition waste. Policy 35 requires all major development proposals must be

accompanied by a Waste Management Plan which demonstrates how the criteria set out below will be achieved:

- i. Provide adequate internal storage space within their premises to enable the occupiers to separate, store and recycle their waste;
- ii. Provide adequate, secure, external or communal storage facilities on site which allow for the separate storage and collection of waste, reusable items, recyclable materials and compostable waste;
- iii. Include on-site waste management, which minimises the need for waste transfer, where it is feasible to do so;
- iv. Allow for convenient and safe access to manage waste, including for older persons or persons with disabilities;
- v. Allow for convenient and safe access for waste collection services;
- vi. Implements high quality design solutions to minimise the adverse visual impact of waste facilities onsite;
- vii. Enable waste from mixed-use schemes to be segregated in separate secured areas; and
- viii. Provide innovative solutions to reduce waste at source.

10.75 A Waste Management Strategy has been submitted with the application that anticipates waste from the school would be accommodated with a total of 13 no. 240 litre bins for refuse, recycling and food waste on the basis of 420 pupils. Although waste store servicing would be developed in the subsequent design stages it is anticipated that collections would principally be made from the street. It has been identified that the refuse store would be located on the northern edge of the building to provide direct access from the loading bay, which is located near to the kitchen and dining areas on the ground floor.

10.76 Overall, it is considered that the proposed development will provide a suitable waste strategy that meets the requirements of the London and Local Plans. It is considered expedient to secure the details of refuse storage and collection by planning condition to ensure it aligns with the wider masterplan development and that it remains satisfactory against the London and Local Plan policy.

Accessibility and Inclusivity

10.77 Policy S3 and D5 of the London Plan requires that all new development achieves the highest standards of accessibility and inclusive design.

10.78 With regard to this application the D&A Statement advocates that inclusive design is at the heart of the proposal and the details submitted with the application demonstrate that the development could meet the above requirements. As this is an outline application, full details of site levels and design of the school building is not before the Council for consideration at this stage. However, it is anticipated that accessible site levels for the public realm and access to the school building should be able to be created and a condition is therefore recommended to ensure that an accessibility scheme is provided with the reserved matters application.

Secure by Design

10.79 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.

- 10.80 The submitted Design and Access Statement and design code has incorporate secured by design principles to ensure that spaces are visually open, direct, well used and well lit surrounding the school. The principles have been applied to the wider site to ensure the school site appropriately assimilates with the wider masterplan site.
- 10.81 The Designing Out Crime Officer has raised no fundamental objection to the proposal subject to condition.

Archaeology

- 10.82 The site is within an Archaeological Priority area and there is the potential for remains, as such a condition would be attached to any permission for a 'written scheme of investigation' to be undertaken prior to commencement of any development, this would be secured by way of condition.

Other Planning Issues

Financial and Other Mitigation

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

Equalities

- 10.84 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; and
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 10.85 The proposal is primarily for use by children with a wide range of needs for their education and wellbeing. The proposal provides facilities/benefits for this group in particular.

11.0 Conclusion

- 11.1 The proposed school would be linked with the wider development of the Seedbed Centre and Rom Valley Way Retail Park. As such the proposed two form primary school being located adjacent to the proposed new residential development and close to existing residential areas will provide the facilities to meet an identified local educational need.
- 11.2 The outline application is submitted with all matters reserved for future determination; the detailed design, layout and elevational form of buildings is not before the Council. However this application has been supported by a detailed Design and Access Statement with a Design code that is considered to represent a high quality design could be achieved and that the

height and massing of the scheme would be acceptable in its locality.

- 11.3 It is considered the proposed development will not result in unacceptable highway impacts, and will ensure appropriate provision to encourage sustainable modes of transport.
- 11.4 Taking into account the scale of the school proposal at 4 storeys, 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.
- 11.5 To ensure compliance with reductions in CO2 emissions, a condition is attached requiring a post occupation assessment of energy ratings, demonstrating compliance with the above policies.
- 11.6 The application has shown that an acceptable urban greening factor and drainage of the site can be satisfactorily achieved with the details secured by planning condition.
- 11.7 It is therefore considered an appropriate form of development and is recommended that planning permission be granted.
- 11.8 The decision to grant planning permission has been taken having regard to the National Planning Policy Framework (2023), 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.