



Application Reference:	P1087.25
Location:	SPORTS GROUND, BALGORES LANE
Ward	SQUIRRELS HEATH
Description:	PROPOSED DEVELOPMENT OF A NEW SEND SCHOOL (USE CLASS F1(A)) INCLUDING THE CONSTRUCTION OF A NEW PART SINGLE STOREY, PART TWO STOREY SCHOOL BUILDING WITH ASSOCIATED ACCESS, PARKING, PUPIL DROP OFF, SPORTS PITCH, MUGA, EXTERNAL PLAY SPACES AND HARD AND SOFT 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 Secretary of State, pursuant to Regulation 3 of the Town and Country Planning General Regulations 1992 and the Mayor of London under the Town and Country Planning (Mayor of London) Order 2008.

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 a designated playing field, 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, 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, Secretary of State or Mayor for London.

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 Secretary of State, pursuant to Regulation 3 of the Town and Country Planning General Regulations 1992,
3. refer this application to the Mayor of London (the GLA) as a Stage 2 referral; and
4. subject to the Mayor of London (or delegated authorised officer) advising that he is content to allow the Council to determine the application 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. The Unilateral Undertaken obligations Heads of Terms would cover the following matters

Highways

- Contribution towards s278 Highway works to be agreed between parties.
Works includes:

Creation of a 20mph zone on Route 1

- Additional areas to stop and rest along Route 1
- Cracked slab pavement along Station Road to be remediated
- More electric charging provision to promote EV usage
- Re-painting of the zebra crossing on Heath Park Road
- Extend the 20-mph speed limit along route 3
- Signage to be provided at the southern end of Balmoral Road to indicate the shared use of path at the end on route 4
- CCTV could be installed at either end of the shared use path on route 4

- Submission of Travel Plan. The full travel plan should include car and cycle parking monitoring;
- A travel plan bond of £10,000 will be required to be used by the Council to remedy any failure to comply with the terms of the approved travel plan;
- Payment of a Travel Plan Monitoring Fee of £5,000 for the purposes of monitoring the operation and effectiveness of the travel plan;
- The developer to ensure the effective implementation, monitoring and management of the travel plan for the site.

Carbon offset

- Provision of actual carbon emissions and payment of any additional contribution if the on-site carbon reductions stated in the strategy are not achieved – carbon offsetting payment in accordance with Policy SI 2 of the London Plan: Contribution of £49,350 towards carbon reduction programmes within the Borough, duly Indexed

Schedule 3, Part 8 (Biodiversity Enhancement) The Biodiversity Gain Site Register Regulations 2024

Unless otherwise approved in writing by the Council, not to implement the Development until a Biodiversity Offsetting Scheme has been submitted to and approved in writing by the Council.

A formal Community Use Obligation (CUO)

- To secure community access to designated facilities outside of school hours. The following facilities will be made available for community use:
 - Multi-Use Games Area (MUGA)
 - Grass sports pitch
 - Sports Hall
 - Hydrotherapy Pool (for supervised, pre-booked sessions)
 - Enterprise Hub (Learning Kitchen) for school-run community events
 - Front Garden Recreational Space for informal public use during designated hours.

Legal Costs, Administration, Indexation and Monitoring

A financial contribution (to be agreed) to be paid by the developer to the Council to reimburse the Council's legal costs associated with the preparation of the planning obligation and a further financial obligation (to be agreed) to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligation terms. All contributions and fees to be subject to indexation using the BCIS (Building Cost Information Service) Index from the date of the S106 obligation to the date of actual payment.

- 5 Any other planning obligation(s) considered necessary by the Assistant Director Planning.

2.2 That the Director of Planning is delegated authority to negotiate the legal agreement indicated above and that if not completed by the 31st July 2026 the Director of Planning is delegated authority to refuse planning permission or extend the timeframe to grant approval.

2.3 That the 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 and Tree Planting
5. Landscape Management Plan (Including biodiversity benefits of the scheme)
6. Secured by Design
7. Delivery and Servicing Plan
8. Window and Railings Details
9. Photovoltaic Panels
10. Boundary Treatments & Fencing Strategy
11. Water Efficiency

12. Energy Statement Compliance
13. External Lighting Scheme
14. Noise Protection
15. Air Quality Neutral
16. Contaminated Land
17. Surface Water Drainage
18. Sustainable Drainage Systems (SUDs)
19. Floodlighting
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 (Sport Hall and others)
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 Environmental Management Plan for Biodiversity
36. Notwithstanding the approved plans details of the façade and entrance approach, cycle storage location, elevation design bay details and boundary details
37. Dust management Plan
37. Secured by Design award scheme
38. Archaeology
39. Construction Environmental Management Plan for Biodiversity
40. In Accordance with Ecological Appraisal Recommendations
41. Protection of Trees
42. Signage

Informatives

1. Fee required for approval of details
2. Highway approval required
3. Secure by design
4. Street naming and numbering
5. NPPF positive and proactive.

3 SITE AND SURROUNDINGS

- 3.1 The area to which this application relates comprises some 2.27ha of open grassland known as Balgores Fields, located in Gidea Park, Romford. It is used as playing fields by the nearby Squirrels Heath Infant School for informal sports and play purposes. The site, though irregular, is roughly L-shaped, running a short length along the north-eastern side of Balgores Lane, and is generally flat.

- 3.2 The northern part of the site is designated 'General Amenity Grass' and the southern part of the site is designated 'General Amenity Grass' and 'Football Pitch' in the Local Plan.
- 3.3 The eastern, southern and western boundaries of the site are predominantly shared with the rear gardens of two-storey residential properties on Balgores Lane, Heath Park Road, and Balmoral Road. These boundaries are defined by a combination of fencing, mature hedges and established trees located both within and adjacent to the site.
- 3.4 To the north, the site is bordered by the Gidea Park Library site, a pedestrian footpath and Heath Park Allotments, beyond which lies the Great Eastern Main Line railway. These allotments form part of a broader green corridor and contribute to the area's suburban character. The adjoining Gidea Park Library is currently closed to the public.
- 3.5 Access to the site is along its northeastern boundary on Balgores Lane, which accommodates an existing gated vehicular access used for grounds maintenance. A secondary pedestrian access is located in the south-western corner of the site from Heath Park Road, although this is not currently used as a formal entrance.



Site Location

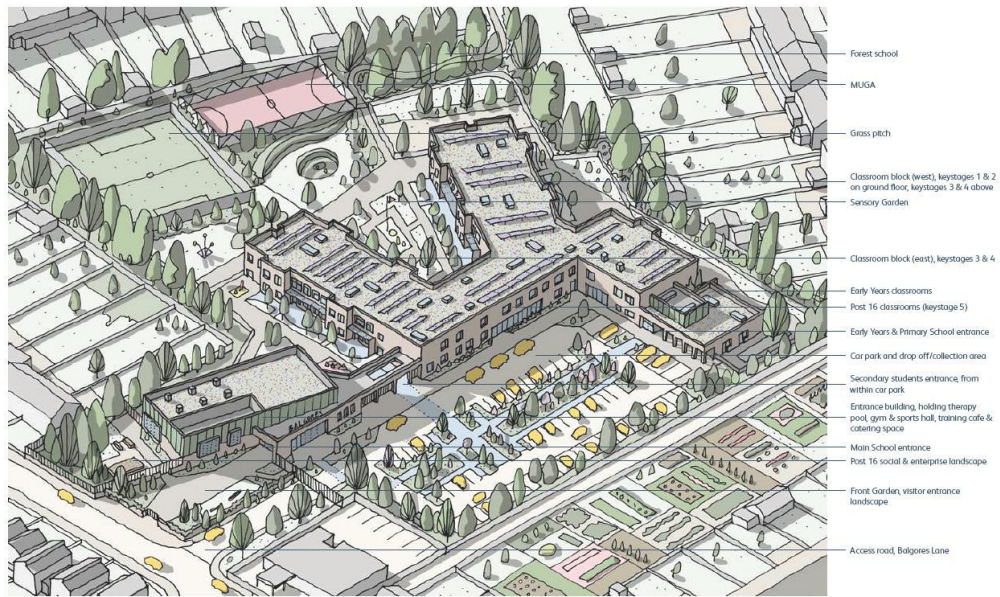
- 3.7 The application site lies within a well-established suburban residential area in Gidea Park. The wider area is characterised by predominantly two-storey inter-war semi-detached and detached housing, tree-lined residential streets, and a network of local amenities and community facilities. Gidea Park district centre and Gidea Park Station, is located within a 10-minute walk.
- 3.7 The site is within Flood Zone 1 and has a low risk of flooding from rivers or sea and also a low risk from surface water flooding.
- 3.8 No trees within the application site are covered by tree preservation orders.
- 3.9 The application site also has a PTAL rating of 3 'moderate accessibility'.

Legal Context and Historic Use

- 3.0 According to the supporting statement, “the land was originally transferred to Essex County Council in 1914 for education purposes and is subject to a restrictive covenant that prevents its use for anything other than education or associated uses. The covenant was later varied to include both secondary and primary education as acceptable uses. In 1965, the land was transferred to the London Borough of Havering following the formation of the Greater London Council (GLC).”
- 3.11 It was “historically used by the former Royal Liberty School, and more recently Squirrels Heath Infant School, the site has never been publicly accessible open space.”

4 PROPOSAL

- 4.1 The application seeks full planning permission for the erection of a part single, part two storey building with a total floor area of 6339m² (GIA) to provide a new 38 classroom Special Education Needs and Disabilities (SEND) school for both primary and secondary students with associated access and car parking, informal and formal play space, hard multipurpose games pitch (MUGA), hard and soft landscaping.
- 4.2 The school will have a capacity for 300 pupils aged 4-19 years (Key Stage 1 to 5), students with complex learning needs serving children from Havering’s local community, and 218 members of staff would be employed on the site to support its operation.
- 4.3 The school would provide a special educational school for children with social, emotional, and mental health needs (SEMH) difficulties, Autistic Spectrum Condition (ASC) and severe learning difficulties; it will help meet a pressing need for additional SEN school places in the Borough and will help ensure students are taught in specialist, purpose-built buildings specifically suited to their particular learning needs.
- New building
- 4.4 The proposed school building would be sited on an existing open green field. It would be a part single, part two storey building with a broadly U- footprint designed as a series of interconnected wings arranged logically to meet the needs of the different year groups. The layout groups Early Years, Primary, Secondary, and Post-16 pupils into distinct zones.



Extract from 'Proposed Site Plan'

- 4.5 A central entrance block fronts Balgore Lane, providing a civic presence with reception, administration, and community-use facilities, including a café and performance space. Specialist facilities such as a hydrotherapy pool, sports hall, and enterprise hub are centrally located and accessible to all. The community use facilities will be available outside of school hours, at weekends and in school holidays it is planned that the facilities will be available for the benefit of the wider community.
- 4.6 The main entrance to the school building would be on its eastern elevation, facing Balgore Lane. A lift within the building would provide full access across both floors in compliance with access requirements for those with impaired mobility.
- 4.7 Each teaching cluster has direct access to secure external classrooms, acting as sheltered transition spaces leading to wider open play areas and sensory gardens. The layout integrates movement between internal and external spaces, promoting independence while maintaining supervision and safeguarding.
- 4.8 In terms of scale, the building would have a footprint of approximately 135m (including the single-storey element to the east by the entrance) by 97m wide at its far end to the west and approximately 56m wide in the middle of the main building. The main elevations would rise to a height of approximately 8.4m above ground level while the single –storey aspect is approximately 5.5m high. The building would have a flat roof, with green roof. The roof would also accommodate solar PV panels located across the whole of the building, which would increase the roof height by approximately 200mm to 8.6m from ground level. The railing around the top of the western block will add 800mm to the overall height of this element of the building to approximately 9.2m.



Early Years and Primary School, car park Elevation

- 4.9 In terms of materials, the proposed building will be predominantly clad in light buff brickwork, providing a durable, low-maintenance finish that complements the surrounding residential character. Key entrances are highlighted with green vertical rainscreen cladding panels, enhancing legibility and civic presence. Large glazed openings and curtain walling are used to maximise natural light, particularly in communal and specialist teaching areas. External canopies provide shading and shelter at classroom entrances. The building's glazing would be complemented with channel glazing panel, which would reflect the sensory benefit of the proposed use.



Rainscreen cladding to entrance elements

- 4.10 On the principal elevation to the wider view from the streetscene and gardens of neighbouring residential properties and the allotments, the materials and design of the school building is visually attractive, sustainable and efficient, but also offers flexible, usable and functional space to meet the needs of the pupils attending the school.

Access, parking and drop off arrangements

- 4.11 The proposed development includes a new vehicular and

pedestrian access from Balgores Lane, serving both staff and visitor parking as well as secure pupil drop-off areas.

- 4.12 This access would allow for two way vehicle movements and provide a segregated pedestrian footpath on the north eastern side. It would be gated 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 10 visitor/parents and guardians bays for pick up / drop off together with 5 bays for minibus

pick up / drop off parking. The car park provides 3 disabled parking bays (2 within the staff parking and 1 within the drop off / visitor parking), 3 car share bays and 9 active/passive electric charge bays (2 of which are minibus bays). 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.

4.13 In addition to this, 29 staff car parking spaces for staff of the new SEND school would be laid out towards the northern central corner of the site. 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.

4.14 Service vehicles and refuse vehicles would use the new vehicular access point.

Outdoor space and landscaping

4.15 The SEND school would be provided with its own dedicated outdoor play space, located to the south of the building. This would include a soft informal play area, hard outdoor MUGA area, a woodland-style Forest School, and dedicated Post-16 horticulture and enterprise spaces. These spaces would be surrounded using fencing of varying heights.

5 PLANNING HISTORY

5.1 There is no relevant planning history.

Pre-Application Discussion

Prior to the submission of this planning application, the applicant has engaged with LBH planning and design officers over 10 months. Officers agree that the site comprises playing field and the principle of a new special needs school development may be acceptable if the Needs Test and Sequential Approach Test are shown to outweigh the harm caused to the loss of designated playing field subject to the application submission demonstrating that massing, height layout, access and landscaping are acceptable and that the loss of the playing fields can be justified or an alternative/replacement sports pitch is provided and there is an element of community uses. In respect of the design of the proposals, the scheme has also been subject to post submission discussions with Officers as well as a QRP review. Officers expressed throughout the pre-application process that the quantum of development, layout arrangement will carry significant weight in the determination of an acceptable proposal and that a robust Needs Assessment must be conducted if a case is to be made contrary to Sport England's in principle objection.

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

Summary of QRP Comments on 6th May 2025 and Response from Applicant

QRP Comment	Applicant Response
<p>Site Layout The panel supports the principle of the SEND school but advises further refinement to achieve a high-quality, civic building. The site layout should create a welcoming arrival experience, prioritise large, usable outdoor spaces within the secure line, and strategically place buildings to manage site access with minimal fencing. Entrances require greater prominence to enhance legibility for students and visitors. .</p>	<p>The design team has implemented several key revisions in response to the QRP's feedback. The Sport & Leisure block has been repositioned closer to Balgores Lane, improving its civic presence and aiding site access control.</p> <p>The public square has been redesigned as a semi-public space, gated outside school hours, providing a welcoming entrance with seating, flexible use potential, and enhanced wayfinding.</p> <p>The site layout has been refined to prioritise large, usable outdoor spaces, distributing communal play and social areas adjacent to the school, while more active play zones are placed further away. Boundaries have been softened with planting and minimal fencing, and engagement with the adjacent allotments is ongoing.</p>
<p>Sports facilities and green spaces The sports facilities and green spaces must be designed for both student use and wider community access, with clear strategies to dissolve boundaries outside school hours. Aligning the sports hall with Balgores Lane and relocating the MUGA adjacent to it could facilitate controlled community access. The panel recommends consolidating green spaces, increasing tree planting, integrating green roofs and vertical greening, and preserving existing brambles for Biodiversity Net Gain (BNG).</p>	<p>The Front Garden design concept draws on the Gidea Park heritage, using familiar residential motifs to create a community-facing arrival space that doubles as a life-skills learning environment for students. The MUGA and sports pitches have been consolidated into a cohesive area with controlled community access. A polymeric surface is now proposed for the MUGA, and additional tree planting and biodiversity enhancements are incorporated into the landscape</p>
<p>Car park design The car park design should reduce hard surfaces by using permeable paving and planting, and could serve as a learning space for traffic safety skills. The panel encourages imaginative fencing alternatives, such as landscaped mounds, to reduce reliance on standard wire mesh.</p>	<p>The car park design has been refined in a response to the reduction in the number of parking spaces. Increased landscaping softens this zone whilst ensuring it remains efficient and safe to facilitate the highly managed pupil drop off and pick up routines.</p>
<p>Internal design Internally, better daylighting, acoustics, and relationships between communal spaces and external areas are needed. Dining areas require more natural light, and group spaces should avoid through-access disruptions.</p> <p>Sustainability On sustainability, the panel calls for strategies to minimise embodied carbon, consider timber structures, and integrate natural ventilation and photovoltaic technology. Material quality must reflect the ambition of delivering a civic building.</p>	<p>Prominent, colonnaded entrances emphasise visibility and shelter, while daylight access and natural ventilation strategies have been developed alongside energy efficiency targets (EUI). PV panels exceeding DfE baseline efficiency will be installed.</p>

Summary of SPC Comments on 10th July 2025 and Response from Applicant

<p>Travel Modes and Site Access</p> <ul style="list-style-type: none"> Extensive discussion took place regarding travel modes to the site, particularly in relation to car parking and pick-up/drop-off arrangements. The Committee seeks clarity on the percentage split of travel modes. Reassurance is needed regarding the capacity for minibuses and coaches to access and manoeuvre within the site. A Jackman drawing was referenced and should be included to support this aspect. 	<p>Most pupils will travel to the school by SEN-organised transport, with 16 minibuses and minibuses expected, alongside around 46 private cars used by parents or taxis. Drop-off and collection will occur within the site and car park area, managed by staff and spread across three 15-minute windows in both the morning and afternoon.</p> <p>The car park design accommodates half of the buses at once—more than required for any single time window—providing resilience for delays. Additional capacity is achieved through stacking, allowing buses to wait in aisles without blocking passing vehicles. Private cars will use a separate eastern loop, ensuring they are unaffected by bus stacking.</p> <p>Swept path analysis confirms that LBH Passenger Travel Service vehicles can safely manoeuvre within the car park; vehicle dimensions appear smaller on drawings because wing mirrors are excluded. The layout is not designed for full-size coaches, which are unnecessary given the pupils' needs and the absence of large group trips.</p> <p>Refuse collection, servicing and deliveries will also take place within the car park, but only outside the designated drop-off and pick-up periods.</p>
<p>Traffic and Road Modelling</p> <ul style="list-style-type: none"> Further detail is requested on road speeds and traffic flows into and out of the site. <p>Specific modelling of a 20mph speed scenario outside the school is needed to assess feasibility and impact.</p>	<p>The proposal includes several highway improvements around the site. The existing dropped crossing and former library entrance will be removed, replaced with a new raised table access point serving the school's access road and car park. The former library's rear car park will remain accessible via this new road outside school hours.</p> <p>The existing disabled parking bay beside the former library will be relocated onto the street, replacing one of three pay-by-phone bays; the remaining two will be converted into wider footway space. Additional footway widening is proposed south of the crossing.</p> <p>Unrestricted parking bays along Balgores Lane will be removed and replaced with school keep-clear zig-zag markings, with the single yellow line extended to join the existing restriction. The current 20mph zone, which ends 114m north of the site, will be extended by 185m to cover the full site frontage on Balgores Lane. No changes are planned to bus stops or pedestrian crossings.</p> <p>All works will be delivered through a Section 278/38 agreement. A Stage 1 Road Safety Audit has been completed independently and identified no significant safety issues.</p>
<p>Staff Parking Provision</p> <ul style="list-style-type: none"> The number of staff parking spaces in relation to proposed staff numbers was discussed. 	<p>Because the London Plan gives no specific parking standards for schools, provision must be assessed individually. The Trust and LBH initially requested at least 60 staff parking spaces (28% of staff), while TfL</p>

<ul style="list-style-type: none"> Justification for the proposed provision should be expanded to demonstrate rationale. 	<p>recommended reducing this number and providing evidence that any parking proposed is the minimum required, in line with Policy T1, which promotes sustainable travel.</p> <p>A review of staff travel patterns at comparable SEN schools run by Astrum Trust and Lime Trust showed that only about 12–13% of staff live more than 60–75 minutes away by public transport. Based on this analysis, the proposal is to provide 29 staff parking spaces—equivalent to 13% of total staff numbers.</p> <p>In addition, 10 parking spaces are proposed for private student drop-off, which can also be used by visiting professionals and families. Five minibus spaces are included for school-owned vehicles that will not take part in daily drop-off or collection. The car park will also include 3 disabled bays, 3 car share bays, and 9 EV charging bays (including 2 for minibuses).</p>
<p>Playing Field Concerns</p> <ul style="list-style-type: none"> Concerns were raised about the loss of playing field space. Justification for this loss should be further developed, including evidence of historic and proposed usage. 	<p>Before Galliford Try was appointed, the London Borough of Havering carried out a detailed Sequential Site Assessment (SSA) to identify suitable locations for a new SEND school. The review considered unused educational sites, other council-owned land, and privately owned vacant sites, assessing them against key criteria such as size, accessibility, planning risk, environmental impact, and community support. Balgores Fields was identified as the most suitable option, offering good public transport access and proximity to civic facilities. The full SSA will accompany the planning application.</p> <p>Balgores Fields currently has no public access and has not been used by sports clubs for many years. The northern area last hosted marked sports pitches in 2013–2014 and has had no use since 2017–2018. The southern area has been used intermittently, most recently only occasionally by Squirrels Heath School.</p> <p>The proposal includes a new grass playing field and a Multi-Use Games Area (MUGA), significantly enhancing the site’s sports provision with improved drainage and an all-weather facility. These facilities will remain available to Squirrels Heath School and, through a Community Use Agreement, will be accessible to the wider public.</p>
<p>Floodlighting and Outdoor Space</p> <ul style="list-style-type: none"> Clarification is needed on whether the outdoor space (eg MUGA) will be floodlit. It was noted that this aspect is currently under development and should be addressed in the next submission. 	<p>The initial MUGA lighting design proposed high-level, pole-mounted floodlights to provide strong, even illumination. However, concerns were raised during early consultations about potential glare, light spill, and visual impact on nearby properties.</p> <p>In response, the lighting strategy was revised to a more sensitive solution using wall-mounted luminaires fixed to the pitch fencing. These lower-level fittings direct light across the playing surface with far less upward or outward spill, reducing potential disturbance to neighbours while still meeting the required lighting standards for outdoor sports.</p>

<p>Ventilation</p> <ul style="list-style-type: none"> Further information is requested on the proposed ventilation strategy. <p>Reassurance is also sought regarding the longevity and maintenance of planting schemes</p>	<p>Classrooms will use fan-assisted natural ventilation heat recovery units (NVHRs) to maintain fresh air and thermal comfort. These units automatically adjust fan speeds based on CO₂ levels and temperature, with manual boost controls and secure louvred openable windows to prevent overheating.</p> <p>The commercial kitchen will have a dedicated roof-mounted air handling unit designed to DW/172 standards, with ventilation arranged to minimise odour transfer to nearby spaces.</p> <p>Double-height areas, such as the sports hall, will use roof-mounted, fan-assisted windcatchers to provide natural ventilation while maintaining thermal comfort.</p> <p>Staff areas will combine natural ventilation through openable windows with ceiling-mounted mechanical ventilation heat recovery units (MVHRs). Their operation is guided by thermal modelling, and each room will have sensors to modulate fan speeds and optimise air quality and comfort.</p>
<p>Landscaping</p> <p>Reassurance is also sought regarding the longevity and maintenance of planting schemes</p>	<p>Future maintenance of the school grounds will be the responsibility of the Trust, we would also anticipate a planning condition requiring that any trees or plants which within a period of 5 years from completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species.</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 high quality that integrates appropriately within the surrounding context accounting for its site constraint..

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 2 in person public consultation exercises including flyer / mail drop / invite and an online article presentation was conducted.

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

1. Proximity to neighbouring properties and associated privacy concerns"

Through the evolution of the scheme the proposed building has been moved further away from all existing residential properties. Where the proposed building is 2 storeys a separation distance of 65.5m is now proposed from properties that front Balgores Lane and 38.5m from

properties that front Balmoral Road. Where the building is closest to Balmoral Road in the north west corner of the site, the scheme has been reduced to single storey and the separation distance is 30m. Existing trees along the boundaries will be retained and enhanced landscaping is proposed

2. Community use and use by Squirrels Heath School

The proposals have been designed to allow for the continued use of the grass pitch and MUGA by Squirrels Heath School during the school day. They would continue to access the site from Heath Park Road as per the current situation. The sports facilities including the sports hall, gym, pool, enterprise space, changing facilities, MUGA and grass pitch will all form part of a Community Use Agreement that will allow the community to use the facilities out of school hours and during school holidays.

3. Concerns around traffic and access and parking

The planning application is supported by a Transport Assessment that provides full details of the various measures being employed to mitigate the impact a summary of the key points is set out below:

- All pupils will be dropped off within the site and the scheme has been designed to ensure all vehicles dropping off children can be accommodated on site. There will be no requirement for parents to drop off children in the surrounding streets.
- The majority of children will arrive by shared transport (mini or midi buses) with a small number arriving by private car or taxi. Therefore the number of vehicle movements compared with a non SEND school is significantly reduced.
- The start and finish times will be staggered over 3 x 15 minutes periods therefore further reducing the concentration of vehicles arriving and leaving the site at any one time.
- Road safety: yellow keep clear markings, extended single yellow lines and the extension of the 20mph zone are all proposed
- Parking for staff has been reduced to encourage the use of more sustainable modes of transport

4. Substation location

The substation previously proposed to be located at the front of the site adjacent to the boundary with number 210 Balgores Lane has been relocated to within the site away from Balgores Lane. The trees previously proposed to be lost in this area are now retained.

5. Construction access

The pedestrian access proposed during the construction phase was previously proposed to be located off the pedestrian path from Balgores Lane to Balmoral Road. This has now been amended to be from Balgores Lane.

6. Landscape and boundary treatments

The landscape proposals have evolved significantly during the evolution of the scheme and the landscape has been enhanced throughout the site. With landscaped buffers proposed to the boundaries. The boundary treatments have also been rationalized. It is however a requirement of the school that the boundary treatments are secure for the protection of the children and therefore the proposals do incorporate a secure perimeter boundary.

6 CONSULTATION RESPONSE

6.1 Statutory and Non Statutory Consultation

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

LBH Highways: The proposals are considered acceptable in principle, should planning permission be granted. It is anticipated that, subject to adherence to the submitted plans and any conditions imposed, the development can be accommodated without causing significant adverse impacts on the Public Highway. The proposals are expected to integrate effectively with the existing highway network while maintaining safety and accessibility for all users, including pedestrians, cyclists, and motorists.

LBH Environmental Health (Air quality and Contamination): No fundamental objection subject condition

LBH Environmental Health (Noise) No fundamental objection subject condition

LBH (Waste Management): No Domestic waste associated with this application

LBH (Arboriculture (Trees): Suitable root protection methods have been proposed in the submitted Arboricultural Impact Assessment. No fundamental objection subject to condition;

LBH (Landscaping): No fundamental objection subject to condition;

LBH Ecology): No fundamental objection subject to condition;

TfL: From a strategic transport perspective, we generally consider that the proposed development is capable of meeting the relevant transport policies set out in the London Plan and help achieving the goals of the Mayor's Transport Strategy; this is subject to a set of planning conditions, obligations and s278 works.

The key matters that must be addressed prior to determination are:

- ATZ improvements, and particularly crossing along Balgore Lane
- Assumed percentage of drop-offs, and impact on junction's operation

UK Power: No objection

Thames Water: No objection

London Fire Brigade: One new private fire hydrant should be installed. No fundamental objection;

Health and Safety Executive (HSE – Fire Statement): The building does not fall under the remit of planning gateway. No comment.

Historic England: No objection raised subject to condition

Design Out Crime Officer: No fundamental objection subject condition

Sport England: Sport England raises a statutory objection to the application because it is not considered to accord with any of the exceptions to our Playing Fields Policy or paragraph 104 of the NPPF.

Greater London Authority Stage 1 Response – London Plan policies on land use, design and transport 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: the provision of a new SEND school is strongly supported in principle. Given the partial loss of playing field and designation the needs assessment and sequential test should be further scrutinised by the Council, and access to replacement sports facilities should be secured.
- Urban Design: The design, layout and architecture is well considered and supported.
- Transport: The ATZ should be reviewed, a travel plan submitted, a Parking Management Plan must be secured, and updated on a yearly basis and details of servicing and logistics conditioned.

Other matters on energy, whole life carbon, air quality, and urban greening also require resolution prior to the Mayor's decision-making stage.

Recommendation

That Havering Council be advised that the application does not yet fully comply with the London Plan for the reasons set out above. Outstanding matters relating to land use, transport and sustainability should be addressed.

Comments following additional info provided by applicant

Energy Strategy

Be Lean – further exploration of energy efficiency measures:

Applicant Response: All relevant passive and active design measures in line with Be Lean have been explored. This includes the building thermal envelope, efficient building services, lighting etc. Section 6 of the submitted Energy Statement provides full details.

Be Clean – demonstration that number of energy centres has been limited:

Applicant Response: Section 7 of the submitted Energy Statement demonstrates that there are no existing or proposed energy centres surrounding the site. It does

recognise that the site is located in a Heat Network Priority Area (HNPA) and therefore provision has been made for future connection.

Be Green – demonstration that renewable energy has been maximised, including detailed roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;

Applicant Response: The proposed confirmed PV area as per the energy statement is 340sqm. Scope to add more PV is restricted due to space constraints and shading concerns in line with the DfE output spec however the detailed M&E strategy is still being developed further improvements might be possible once the final strategy has been confirmed.

Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;

Applicant Response: Section 10 of the submitted Energy statement confirm the applicant's commitment towards monitoring the developments energy performance post completion and would be happy for this to be secured via S106 or other legal agreement or planning condition.

Energy infrastructure – further details on the design of the heating network connection is required, and the future connection to this network must be secured by condition or obligation;

Applicant Response: Section 7 of the submitted Energy Statement highlights the considerations that have been made should the opportunity to connect to a DHN in the future arise. The applicant has confirmed they would be happy to accept a planning condition requiring further details of the design and space allocation for a future DHN connection to be submitted once the M&E strategy has been finalised.

Managing heat risk – further details to demonstrate the cooling hierarchy has been followed.

Applicant Response: Overheating compliance has been demonstrated in line with the cooling hierarchy in line with Policy SI4. Please refer to section 12.2 in the Energy Statement.

Whole Life Carbon

The GLA Stage 1 Report noted that a Whole Life Carbon GLA Spreadsheet should be submitted to enable a full review. This was submitted to the LB Havering and will be sent to the GLA as part of the Stage 2 referral process.

Circular Economy

The GLA Stage 1 Report noted that revisions were required to the Circular Economy Statement to enable full compliance with London Plan policy S17. Submitted with this letter is a revised Circular Economy Statement (with revised appendices) and GLA Circular Economy Statement.

The applicant should demonstrate that publicly accessible open space, preferably with proposed greening, has been considered as part of the design. This should be demonstrated prior to Stage 2 to determine compliance with Policy G4 of the London Plan.

Applicant Response: The proposals is for a SEND school and by its nature needs to be secure for the safety and wellbeing of the pupils. This requirement together

with the space constraints of the site have resulted in little opportunity to make part of the site open to the public as designated open space.

A significant concession that has been made during the development of the scheme has been the entrance approach or school front garden. This semi-public open space helps the site integrate with its surrounding and provides an appropriate public interface with Balgores Lane. Whilst limited in size it contributes positively to the character of the area and provide a social space where parents, carers and visitors can meet and congregate.

In addition to the above the school will be open to community use during the evenings and weekends and the MUGA, sports pitch and some internal facilities will be made available to the public. Opening up the site in this way is a significant improvement over the current situation where no public access is provided to the site at all.

Whilst full compliance with Policy G4 is difficult given the constraints of the site it has been demonstrated through a robust sequential assessment that there are no other more suitable sites within the Borough to deliver this much needed SEND school. The significant public benefits secured by the proposed development are considered to mitigate the slight non-compliance with Policy G4.

Biodiversity Net Gain

The applicant should improve the Biodiversity Net Gain to at least the mandatory 10% for all BNG habitat units or higher if there are higher local targets.

Applicant Response: Given the various functions the proposed development needs to accommodate the site is quite constrained. A further consideration has been in respect of the type of planting that can be proposed, due to the needs of pupils this must be both robust and safe without thorns, berries etc. Areas with less traffic are limited but do include a wide range of shrubs and plants.

The design process involved extensive scrutiny of the landscaping proposals liaising with the school to ensure the various spaces were safe for pupils, met design guidelines, allowed for community use whilst also enhancing ecology and biodiversity. Early optioneering showed that the development would result in an overall loss of biodiversity however through further design development this was enhanced. Unfortunately, further design development and discussion with the school has meant that the south west corner of the site previously indicated as a fenced off area (therefore enabling the protection and enhancement of BNG) is now required for use of the school and cannot be fenced off as previously intended. This has resulted in a reduction of the BNG (see revised BNG Statement and Metric). The Design Team will strive to improve this in the detailed design but at this stage of the process any further increase cannot be guaranteed.

LB Havering, Place Service Team have provided ecological advice on this proposal and have confirmed they have no objection subject to conditions which include the submission of a Construction Environmental Management Plan (CEMP), submission of a Biodiversity Enhancement Strategy and Habitat Management and Monitoring Plan (HMMP). They also propose a Biodiversity Net Gain condition requiring a Biodiversity Gain Plan and confirmation of the purchase of off-site

Water Efficiency

The GLA Stage 1 Report commented: The proposed development generally complies with the requirements of London Plan Policy SI5. However, the applicant should confirm how the proposed 02 Wat 01 credits are achieved, and should also include water harvesting and reuse to reduce consumption of water across the site. This can be integrated with the surface water drainage system to provide a dual benefit.

Applicant response: The 2 credits under BREEAM Wat 01 for the non-residential areas will be facilitated through the specification of water-efficient fittings, including low-flow taps, kitchen sinks, and low-capacity WC cisterns. However, the proposed scheme has also looked to implement further water efficiency measures above and beyond what is required to achieve the minimum standards for an 'Excellent' rating under Wat 01 (Water Consumption), as outlined in the London Plan – these are as follows:

- Incoming mains cold water leak detection.
- Automatic sanitaryware shut-off valves within WC areas.

As noted, there are spatial constraints associated with rainwater harvesting, hence the above water efficiency measures have been implemented to minimise water consumption across the site.

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 95 consultation letters were sent to neighbouring properties regarding this application.
- 8.3 14 representations 7 objecting, 6 comments (2 with conditions), 1 supporting 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:

OBJECTIONS (in representations received)

- i. The notification allows only 15 calendar days to review 43 technical document which is insufficient time for residents to seek specialist advice or provide informed responses - Havering Council is both applicant and decision-maker, raising concerns over impartiality;

Officer Comment: Statutory consultation period is 21 days and not 15 days. Also, the site notice and press advert was carried out on 10/10/25 adding additional 32 days to the consultation period making it a total of 54 days consultation period. In addition, any representations on the proposals are taken into consideration up till the application is determined.

- ii. The site is subject to a covenant limiting use to education. Proposed out-of-hours community use may breach this covenant and create further disruption;

Officer Comment: Planning permission does not override covenant or property right. However, it should be noted that the main use of the site/land is for educational purpose.

- iii. 300 pupils and 218 staff represent a much higher intensity of use than expected;
- iv. Overdevelopment and out of character with the surrounding residential and conservation area;
- v. Exacerbate road congestion in Balgores Lane and surrounding roads, increasing traffic in the area;
- vi. Lack of any local parking;
- vii. Pavement widening would further reduce carriageway width, worsening congestion;
- viii. Inadequate on-site parking for the number of staff;
- ix. Loss of green open space and playing fields;
- x. Noise pollution, Disturbance, and Loss of Amenity;
- xi. Right at the end of our garden and those in the upper classrooms will be able to look into our garden and house – Loss of privacy;
- xii. Traffic and harmful emissions from vehicles;
- xiii. With lack of parking in the area, this is going to increase and be dangerous for pedestrians;
- xiv. Noise from use of the 5 A-side pitch, especially out of regular school hours affecting my residential amenity;
- xv. Any installation of flood lighting will cause light pollution affecting my house and garden;
- xvi. There appears to be room 50 vehicles which is too much considering the site is only a 5-minute stroll from Gidea Park Station;
- xvii. Current Government policy is moving towards providing SEND education in regular schools. As such demand for SEND places could/can be met without turning this green field into such a large and intrusive development;
- xviii. Noise during morning bin collection due to its proposed location long way across the kitchen;
- xix. Loss of wildlife. The EIA carried out appears not to be very thorough.

COMMENTS (in representations received):

- xx. Consideration be given to use of acoustic fencing, which is available, to be erected all around the school to minimise the noise;
- xxi. How many places at the SEND school will be available for Havering students - and how many places are open for other children from other boroughs to apply for?;
- xxii. We have been told first hand that the majority of the pupils will be from Harold Wood and Rainham - there is not much need within Gidea Park. Why is a site in those areas not being developed? Surely this would be far better for the pupils to be able to walk to their school and this must be a human right for their health and wellbeing;
- xxiii. We note a traffic consultation was set up and the results are in the application pack., Unfortunately this was put in place during half term and then exam times, meaning the traffic will be lighter than usual and the consultation is not a true representation of the traffic in the area. It was also June and therefore good weather which has to be considered. We were told that a second traffic survey would be done but no mention of this is in the application. Realistically

one need to be done in November/December to see how bad weather may affect the results. Therefore the traffic survey is faulty and unrealistic - no data can be relied on if not properly carried out;

- xxiv. Has there been any counts on the surrounding road to see how many vehicles are already using the roads? Especially down Fairholme Ave? or the impact of increase cars in the area;
- xxv. I understand that they will encourage staff to use public transport but if not, where are the additional cars going to park. You are removing the parking bays outside the field which is also going to add to the issue as those bays are full all day every day;
- xxvi. I am not against the new school in principle and fully understand the need for it, but I am afraid I have little faith that Havering Council will take the necessary action to minimise the detrimental effects on local residents;
- xxvii. In principle, I have no objections to a new school being built on Balgores Field but object to the current plans as there are many changes to the original concept presented to us including making use of the library;
- xxviii. The building should have been three floors to allow for larger playing field area;
- xxix. Concerned about the height of the trees that it is proposed to be planted along the line of the fence to the footpath next to the now defunct library. If uncontrolled it will be create a light barrier to the adjacent allotments and be very detrimental to growing conditions. Surely hedges rather than trees would be a much better and more easily maintained alternative, while still providing a positive contribution to the site's carbon footprint and a more effective screen to anyone trying to see in.

SUPPORT (in representations received):

- xxx. I am for the playing field use SEND school but as my garden backs on the football pitch would like assurance that the pitch will not be floodlit and will not be used outside school hours or hired out.

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 (2024)

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
 - D3 Optimising site capacity through the design-led approach
 - D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D8 Public realm
 - D11 Safety, security and resilience to emergency
- D12 Fire safety
- D13 Agent of Change
- D14 Noise
 - 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
- 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:

- 2 – Spatial Development
- 12 – Healthy communities
- 16 – Social Infrastructure
- 17 – Education
- 18 – Open space, sports and recreation
- 23 – Transport connections
- 24 – Parking provision and design
- 25 – Digital Connections
- 26 – Urban design
- 27 - Landscaping
- 29 – Green infrastructure
- 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 though need to be read in combination with newer mayoral guidance:

- Sustainable Design and Construction (2009)
- Planning Obligations SPD (2013)
- Designing Safer Places SPD (2010)
- Heritage SPD (2011)
- Residential Extensions and Alterations SPD (2011)
- Children and Young People Education Place Planning Plan (2023–2027)
- Education Provision & Inclusion Delivery Plan (2023–2027)
- Havering Character Study August 2024

10 **MATERIAL PLANNING CONSIDERATIONS**

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

- Principle of Development - School use and Need
- 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
- Landscaping, Tree, Ecology/Biodiversity and Greening
- Financial and Other Mitigation
- Other Planning Issues:
 - Designing Out Crime
 - Circular Economy
 - Whole Life Carbon
 - Community Use Agreement

10.2 Principle of Development (School use and Need)

School use and Need

- 10.2.1 The NPPF, at paragraph 7, states that the purpose of the planning system is to contribute to the achievement of sustainable development. Specifically, in relation to educational facilities (paragraph 100), it is noted that the Government considers it important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:
- give great weight to the need to create, expand or alter early years, schools and post-16 facilities through the preparation of plans and decisions on applications; and
 - work with early years, school and post-16 promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.
- 10.2.2 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.
- 10.2.3 Local Plan Policy 17 (Education) - Encourages new or enhanced education facilities where there is demonstrable need and where proposals are accessible, well-designed, and compatible with their surroundings. According to the supporting document, the Balgore SEND School responds directly to an identified borough-wide shortfall in specialist school places and satisfies all of these criteria.
- 10.2.4 Policy Statement – Planning for Schools Development: This policy statement published by the Department for Communities and Local Government in August

2011 confirms the Government's commitment to ensuring there is sufficient provision to meet growing demand for state funded school places. It also confirms that state funded schools include Academies and free schools.

10.2.5 The statement goes onto to state that:

"There should be a presumption in favour of the development of state-funded schools, as expressed in the National Planning Policy Framework" and with regard to planning decisions Local authorities should give full and thorough consideration to the importance of enabling the development of state-funded schools."

10.2.6 In respect of this and need, the applicants, London Borough of Havering Education Department have presented a case of evidence demand, capacity and to ensure that the proposed new school fits in with the overall identified need for new SEN provision. Work undertaken has shown demographic growth year on year in the number of children with a statement of special educational need or disability where autistic spectrum conditions are the main category of need.

10.2.7 A summary of this case is presented below. This revolves around the pressing need for new SEN school capacity within the borough and has involved an assessment of the alternative options/sites for meeting this need.

10.2.8 The London Councils' annual report on the pressures facing school place planning in London ('Do The Maths 2020' (January 2020)) 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 & Inclusive Delivery Plan 2023 – 2027, the SEND projections published, projected the total number of Havering children and young people to have an Educational, Health and Care Plan (EHCP) in January 2025 to be 3006 having had 1602 children and young people with EHCPs in 2020. Furthermore, unmitigated forecasts suggest this number will rise by a further 50% to 4502 by 2030. Of these, most pupils had Autistic Spectrum Condition (ASC) and Social, Emotional, and Mental Health (SEMH) needs.

10.2.9 In terms of numbers, projections for the next ten years across the Borough identify shortfall of special school for pupils with multiple and complex needs. The projected figures show that the number of EHCPs relating to SEMH are set to over double from 2020/2021 by 2025/2026.

Academic year	Cognition and Learning	Communication and Interaction	SEMH	Physical and/or Sensory	Totals
2020/2021	544	905	272	173	1894
2021/2022	574	1057	312	195	2138
2022/2023	562	1251	385	204	2402
2023/2024	546	1504	468	237	2755
2024/2025	668	1611	517	274	3070
2025/2026	722	1770	561	298	3351
2026/2027	781	1938	610	323	3652
2027/2028	842	2073	661	345	3921
2028/2029	909	2222	721	370	4223
2029/2030	974	2356	779	393	4502

- 10.2.10 In the applicant's Need Statement, the applicant states: "Among this group of children and young people with communication and interaction needs we know a significant proportion will require a place in a special school. We have carried out extensive reviews of the potential development of our existing special school sites. We have worked with architects and planning officers to explore proposals for building extensions to our current special schools. This work has led us to conclude that due to the locations, site layouts, and planning restrictions, it is impossible to expand these schools any further. Consequently, while we currently have three special schools in the borough offering 360 places, plus another 60 place new special school that opened in September 2023 and we have recently expanded the number of places available in SEND Units or Resource Provisions (specialist provisions attached to mainstream schools) to 186, these 606 places are far from sufficient to meet the needs of the significant proportion of our current 3006 children and young people with EHCPs for whom a specialist setting is required, before even considering the projected increases in EHCP numbers".
- 10.2.11 According to the applicant, "The creation of 300 additional places at a new special school within the borough will result in fewer pupils being placed at more costly provision outside the borough than would otherwise be the case. We project that in 2029, there will be 88% fewer pupils placed in independent/non-maintained special schools outside the borough if a new special school is opened. The average cost of placing a child at an independent/non-maintained special school outside the LA is currently £55,905 a year higher than the average cost of placing a child at a special school inside the LA (£39,849). The total cost avoidance of specialist provision for children with EHCPs is projected to be £9.6m lower over three years of opening the new 300 place special school, than without one".
- 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 19 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 Of the 11 sites assessed in Stage 1 of the assessment, three 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, Balgores Lane Playing Field, Ingrebourne / Taunton Hall, Taunton Road, Harold Hill and Former Gasworks, Crow Lane, Romford. The full assessment submitted with the application sets out the assessment in detail, however, to conclude, no alternative non-Green Belt or playing field sites that meet the school needs and which can be considered available, deliverable and suitable have been identified to date.

- 10.2.14 Each of the 11 sites included in the assessment was evaluated independently, using a uniform scoring matrix based on planning, access, physical characteristics, technical constraints, ownership, deliverability, and community impact.
- 10.2.15 The analysis concludes that very few sites meet the stringent criteria required for SEN development without major compromise.
- 10.2.16 Balgores Field is a Council-owned site already subject to an educational covenant, simplifying the legal pathway for development. While slightly under the ideal BB104 minimum area, the rectangular shape and level topography are highly compatible with school design, including the provision of safeguarded outdoor spaces and access-controlled drop-off. The site is in a residential area, offering a safe and familiar setting for SEN pupils. Public transport access is moderate. In terms of deliverability, Balgores Field scores highly given the clarity of ownership, absence of technical constraints, and suitability of layout.
- 10.2.17 The recommendation of the Sequential Assessment recommends that the Council progress with a RIBA Stage 1 Feasibility Study on the Balgores Field site. This site achieved the highest overall score and demonstrates strong alignment with the requirements of Building Bulletin 104 (BB104), Council policy objectives, and the identified needs of the borough's SEN population, therefore making it more sequentially preferable. It is also of sufficient size, available, deliverable.
- 10.2.18 The proposed school will bring benefits in terms of educational opportunities and economies of scale for both the Council and its residents.
- 10.2.19 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 located on the site, 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 encourages new or enhanced education facilities where there is demonstrable need and where proposals are accessible, well-designed, and compatible with their surroundings.
- 10.2.20 The proposed development is for a new SEND school that 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.

- 10.2.21 It is therefore necessary to assess the extent of the harm to the loss of the playing field that would result from the proposed development, and balance this against the weight to be accorded to the case for the new school.

Loss of playing field land

- 10.2.22 Noting the above, this development would still result in the loss of existing playing field. Policy 18, with regard to this, relates to open space, sport and recreation and seeks to ensure that there is good provision of high quality and accessible green space to meet a wide range of recreation, outdoor sport and amenity needs in the Borough. Existing designated open spaces, sports and recreation facilities is to be retained unless:
- a. Replacement provision of equivalent or better quantity and quality will be made in a suitable location; or
 - b. The development is for alternative sports and recreational provision and the need for this clearly outweighs the loss
- 10.2.23 Sport England has raised an objection to this development with it not considered to meet any of the exceptions necessary to allow development on playing fields and comply with their policies and the position set out in the NPPF at paragraph 103 (detailed below for ease of reference).
- 10.2.24 *“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) 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; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”*
- 10.2.25 The proposal is to retain only one under 7/under 8 grass football pitch. With regard to this, according to Sport England, it has not been demonstrated that the playing field is surplus to community playing pitch needs. The applicant is not proposing to mitigate the loss of the playing field in any way and as such an objection is raised to the development in principle.
- 10.2.26 In support of its objection, the consultation response from Sport England states: *“The applicants are proposing community use on the school’s sports lit multi-use games area, (MUGA) together with an under 7/under 8 football pitch. While the MUGA could meet the possible community need, the small side football pitch does not. In fact, given the constrained situation of the pitch it is questionable how much community use could be accommodated, if any outside school use.”*
- 10.2.27 *“We do not consider the MUGA to meet our planning policy exception E5, as there is justification of community need whereas there is a proven need for playing pitches as referenced in paragraph 6.13 of the planning statement.”*
- 10.2.28 *“The proposed community use is also for the sports hall and hydrotherapy pool. The area designated as a sports hall is more like an activity studio. As with the MUGA, Sport England does not consider these benefits as meeting our planning policy exception 5 or bullet point c) of paragraph 104, of the National Planning policy Framework.”*

- 10.2.29 *“Sport England understands the need for the school; however, the proposal does not comply with either national or local planning policy.”*
- 10.2.30 *“Sport England raises a statutory objection to the application because it is not considered to accord with any of the exceptions to our Playing Fields Policy or paragraph 104 of the NPPF.”*
- 10.2.31 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.
- 10.2.32 The applicant has put forward the use of the sport hall and hydrotherapy pool of the new school for community use and related sporting events and the introduction of wall-mounted lighting for the MUGA pitch to allow for use by members of the public outside school hours.
- 10.2.33 The GLA in their Stage 1 response notes that *“while the site is designated open space and a playing field it is historically inaccessible to the public and therefore not within the public open space categorisation in the London Plan. The proposal will result in the loss of a protected open space; however, as a space not open to the public whose purpose as a sports facility for the school will be retained. On balance, while contrary to policy G4, given nature of the site, the need for the school, and the sequential assessment, this may be acceptable in strategic terms.”*
- 10.2.34 According to GLA’s Stage 1 response, a sports audit does not appear to have been submitted in accordance to Policy S5 of the London Plan *“although it is understood that there has never been public access to Balgores Fields; the northern part of the site has not been used as playing field since 2018 and the southern part of the site is only used by Squirrels Heath Infant School, informally and infrequently. Squirrels Heath Infant School will retain access to the southern part of the site and the improved sports facilities forthcoming through this application. It is therefore considered that the proposal, whilst leading to partial loss of a playing field, would be justified in response to Policy S5, given that the playing field has been demonstrated to be surplus to requirements, and existing playing facilities would be replaced. Access to the replacement facilities should be secured through appropriate condition or legal agreement.”*
- 10.2.35 In referring back to the need for this school, to counter that suggested by Sport England, the applicant states that *“it should be noted that the pupils who would attend this school would be severely affected by their autism and/or their learning difficulties. They are therefore unable to access team activities. The new school will provide sports/exercise appropriate to the pupils specific needs and this exposure and benefit is considered a key omission in Sport England’s assessment as a whole.”*
- 10.2.36 In this instance, the applicant’s view has credence. This scheme involves surplus or excess playing field proposed to be used for an alternative education use. Conversely, mindful of that detailed in the NPPF, the position and stance taken by Sport England is considered correct – albeit the NPPF could potentially be interpreted on a site by site basis rather than District/Borough basis as considered

by Sport England. The balance between impact or harm and need however needs to be considered here. And, in this regard (mindful of access to the replacement facilities suggested by GLA) consideration needs to be given to the tests to potentially imposing planning obligations:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

10.2.37 It is accepted that in principle the proposed siting of a school in this location is contrary to policy, in respect of the loss of a playing field. That said, in other factors the development is highly supported. The grounds of objection raised by Sport England are not disagreed. However, it is considered that the objection has not necessarily considered the planning balance or to that the benefits which would be realised to the pupils attending the school in terms of sporting provision/activities.

10.2.38 Whilst a playing field would be lost, seeking to secure a financial contribution as part of any planning permission granted, is considered, would not meet the tests with concerns about necessity and be fair and reasonable in context of the nature of the development proposed.

10.2.39 Without prejudice, should a recommendation that planning permission be granted be formed without a financial contribution towards provision or enhancement of playing fields elsewhere, this application would need to be referred to the Secretary of State in accordance with the Town and Country Planning (Consultation) (England) Direction 2009 in view of the unresolved Sport England objection.

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

10.3.1 The NPPF 2024 attaches great importance to the design of the built environment. Paragraph 131 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.’*

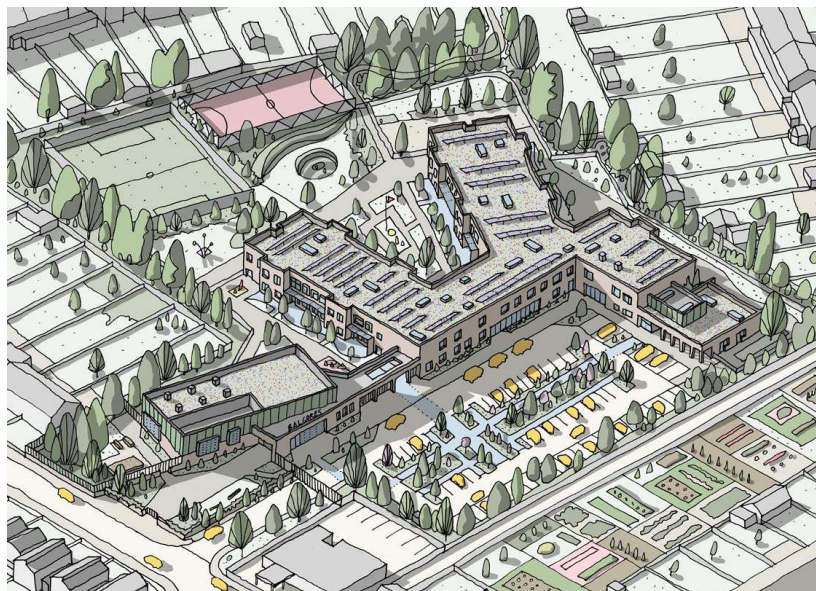
10.3.2 The NPPF states (paragraph 139) that “development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents”. Paragraph 138 states 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 Balgores Lane, with the main entrance located on this north east elevation. Whilst the main building

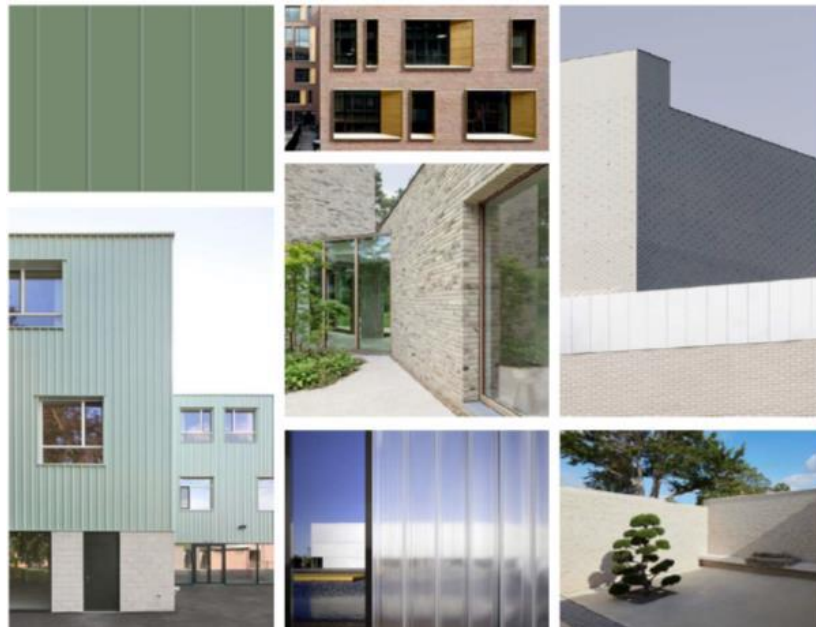
which is two-storeys high would be set back within the site by at least 41m from the boundary with Balgores Lane and the single-storey element to the east of the site set some 8.6m from the same boundary, it would be clearly visible within the street scene. Its two storey scale would not appear at odds in the context of the range of surrounding two-storey residential houses. Whilst there would be roof mounted plant, this has been screened to minimise its visibility from Balgores Lane and gardens of nearby neighbouring properties.

- 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.



Site sketch with materiality

- 10.3.6 The siting preserves generous green buffers along the boundaries, maintaining privacy and visual screening for adjacent homes while optimising space for outdoor learning and play. To the north the proposed car park and drop off ensures the building is stepped away from the neighbouring allotments.
- 10.3.7 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 elevational treatment to the two principal elevations which would be visible within the street scene (the east and north elevations facing and visible from Balgores Lane) would feature materials comprising a natural palette which responds to the local context and creates a character for the school. The predominant material is light buff brick, with the two main entrance forms clad in fibre cement rainscreen to give a contemporary look with an infusion of traditional vernacular. The proposed entrance will have a green cladding 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.



Rainscreen cladding to entrance elements Top: windows and doors, below: Channel glazing Buff brickwork

Chosen architectural materiality

- 10.3.8 The teaching accommodation is over two-storeys, with Reception, Key Stages 1 and 2, in the main, situated on the ground floor and Key Stages 3 and 4 situated on the ground and first floor. Additionally, the building will accommodate multiple therapy rooms, group rooms and calm spaces throughout, and soft-play, therapy and sensory rooms spread across the two floors. There is also a dining area and kitchen on the ground floor.
- 10.3.9 In this context, it is considered that the proposed building would achieve a high standard of design that is both sensitive to its residential, suburban 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. This is considered a generally positive scheme and one that responds well to the site's context and requirements. That said, it is considered that the success of this scheme will rely on the quality of materials proposed being used. For this reason, it is recommended that the material palette is conditioned as proposed. With such a condition secured, 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 Whilst Havering Council doesn't have detailed guidance or policy requirements in terms of minimum separation distances that should be secured, good practice and

widely accepted "rule of thumb" in conventional suburban areas is between 15m and 21m for back-to-back distances at above single-storey height. A distance of at least 65m would be maintained between the rear elevations of the residential properties on Balgores Lane and at least 30m between the rear elevations of the residential properties on Balmoral 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 Balmoral Road and Balgores Lane, it is not considered that the proposed development would result in any unacceptable loss of light or overshadowing in this regard.

Seperation	School façade to boundary	Façade to facade
Proposed building to 22 Balmoral Road (single storey)	17.5m	30m
Proposed building to 20 Balmoral Road (two storey)	18m	38.5m
Proposed building to 210 Balgores Lane	21m	65.5m

Separation distances

- 10.4.4 In addition to the separation distances proposed, each of the boundaries contain existing or proposed landscaping including trees that will offer further protection of privacy and any visual impact will be further mitigated for these neighbouring residents.
- 10.4.5 The stepped and low-level massing strategy ensures that larger two-storey elements are centrally located within the site, well away from residential boundaries and will not lead to any significant overshadowing. The single-storey wing closest to neighbouring properties will have minimal impact on daylight and sunlight levels. Given the site width and the retention of landscaped buffers, the proposed building's orientation and height will mitigate and minimise overshadowing.

Floodlighting

- 10.4.6 The application is supported by an external lighting impact assessment. 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 pupils and staff around the building, whilst minimising levels of obtrusive light.
- 10.4.7 It is proposed to install floodlighting for the MUGA court. The lighting strategy will be wall -mounted luminaires positioned on the fenced panelling around the pitch. These fittings are designed to project light across the pitch from a lower angle, significantly reducing the risk of glare and limiting upward and outward light spillage towards nearby residences. It is considered that the proposed arrangement provides a more controlled and focused lighting solution while maintaining compliance with recommended lux levels for outdoor sports use.

10.4.8 The installation of lighting 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.

10.4.9 Issues in terms of air quality, noise impact are addressed below.

10.4.10 Giving consideration to the scale of the proposal, it's 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 26 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 Balgores Lane, where there is an established access into the playing field. This access will be widened and leads to a parking court towards the north and western corner of the site. The access will 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. 10 bays for pick-up/drop-off / visitor purposes, are to be located to the front. 5 light vehicle (minibus) spaces are also proposed in the forecourt parking area at any one time.

Cycle parking

- 10.5.4 Dedicated cycle parking would also be provided off this area, with a covered and lockable shelter for 28 long-stay staff cycle spaces and 14 short-stay visitor cycle spaces near the school entrance to support community use of facilities outside school hours. The stands are sufficiently well located, covered, and designed to encourage use.
- 10.5.5 Short-stay cycle parking has also been provided for the MUGA, and also in this case the proposal is deemed acceptable. All short-stay cycle parking is located within a short distance of the school entrance, ensuring it is well-positioned to serve the development effectively.

Parking provision

- 10.5.6 The school will accommodate 300 pupils of both primary and secondary age, supported by 218 staff. The school will accommodate both primary and secondary school aged pupils.
- 10.5.7 A total of 29 onsite parking spaces will be provided; 2 of which will be designated for disabled users and two for visitors. 3 disabled parking bays (2 within the staff parking and 1 within the drop off / visitor parking) will be provided 3 car share bays and 9 active/passive electric charge bays (2 of which are minibus bays). 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. Parking has been allocated based on the proportion of FTE staff living outside a 60 to 75-minute public transport catchment.
- 10.5.8 According to TfL, in order to “*support Mayors Transport Strategy (MTS) targets and encourage active and sustainable travel, car parking could have been reduced further. However, having considered the rationale behind the inclusion set out in detail in the TA, and the nature and location of the proposed development, we conclude that on balance the proposed quantum is reasonable.*”

Proposed Highway Works

- 10.5.9 Highway improvement works are proposed to remove the existing dropped crossing into the site, and entrance into the former library in the north east corner. A new raised table entrance is proposed which will link to the access road and car park. The existing car park to the rear of the former library will be accessible via the new access road. This junction will be outside of the proposed gates of the car park, so can remain accessible outside of the school times.
- 10.5.10 There is an existing disabled parking bay, just off the adopted highway adjacent to the former Library. As the junction to the former Library is to be shut off, it is proposed to relocate this disabled bay on to the street, in front of the former Library. The three existing ‘pay by phone’ bays are proposed to be removed, one to be replaced by the disabled bay in front of the former library and the other two will be on the extended footway. The footway is proposed to be widened to the south of the crossing.
- 10.5.11 The unrestricted parking bays along the frontage of the site on Balgores Lane are proposed to be removed, and the section of road in front of the site will become yellow zig zag ‘keep clear’ markings, and the existing single yellow line will be extended to meet the existing.

- 10.5.12 It is proposed to extend the 20mph zone which currently ends approximately 114m to the north of the site, at the junction with Fairholme Avenue, by 185m, so it runs to the end of the school frontage on Balgores Lane. No modelling is required to confirm the suitability of this. No changes are proposed to existing bus stops or crossing points.

Trip generation

- 10.5.13 All drop-off and servicing movements will be fully contained within the site to prevent overspill or obstruction on Balgores Lane. The pupil drop off and pick up will be staggered with three separate 15-minute periods for different key stages. Due to the needs of pupils the drop-off and pick period will be managed by several trained members of staff to ensure pupils are helped safely to and from vehicles at the beginning and end of the day.
- 10.5.14 All servicing and delivery will be scheduled to be undertaken during the school day to avoid pupils at the start and end of the school day. The applicant has made commitment that no vehicles will stop to load or unload on the surrounding public roads, and that deliveries are proposed to occur outside of peak hours. A Delivery and Servicing Management Plan condition will be imposed.
- 10.5.15 An increase of 152 people is expected to use public transport. Staff are asked to arrive before students between 07:00-08:00, and hence during the peak period for the public transport network. Staff are expected to start departing the site between 16:00-18:00.
- 10.5.16 According to the supporting Transport Assessment (TA) with regard to the 300 students, (only) 15% are estimated to be dropped off by car, with the remaining 85% arriving by minibus. Other modes were excluded from the calculations, and while they may happen in practice (and would be welcomed), this choice is understood and accepted. All the trips would take place between 8:00 and 9:00 and then 15:00 and 16:00. TfL is of the opinion that – as presented – the impacts would be acceptable. However, this is subject to clarifying the aforementioned (unevidenced) 15% / 85% drop offs/minibuses split assumed, as this may change the conclusion above. In the absence of robust evidence, a Sensitivity Test with a different split (potentially a 50-50% split) would be helpful to quantify the impacts. A condition requiring submission of a Framework Travel Plan will be imposed
- 10.5.17 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 not have undue impact on the capacity of Balgores Lane and the surrounding road network.

Travel plan

- 10.5.18 An interim school travel plan has been submitted in support of this application with four key targets:
1. All staff will have 100 percent Travel Plan Awareness;
 2. A reduction in car trips by all staff from 13% to 10% within the first 5 years (0.6% year on year reduction);

3. Increase the mode share of cycling and walking from a total of 17% to 19% (0.4% year on year increase) over 5 years;
4. Increase the mode share of public transport from 70-71% (0.2% year on year increase).

10.5.19 This has been reviewed by the Highway Authority and TfL who consider that they could be more ambitious; that surveys should be carried out using Trip Rate Information Computer System (TRICS) Standardised Assessment Methodology (SAM) specifications. Should monitoring reveal that targets are not achieved, more stringent measures must be considered.

Conclusion

10.5.20 Overall, it not considered that this development would give rise to undue highway safety or efficiency impacts. Accordingly, subject to the development being undertaken as proposed and various conditions relating to management of the construction phase, submission of a revised travel plan and its ongoing implementation and review, submission of details of electric vehicle charging points and their subsequent installation and Parking Management Plan, the development is considered to comply with relevant transport policies.

10.6. **Flood Risk and Development**

10.6.1 Local Plan Policy 32 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 32.

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 32, policies SI12 and SI13 of the London Plan and the NPPF.

10.7 **Sustainability**

10.7.1 Paragraphs 162- 165 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 Local Plan Policy 36 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. Under the Be Lean scenario the development shows savings of 0.9 tonnes CO2 / annum, which is a 3% saving over the Part L2 2021 Baseline;

“Be Clean” –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 – 0% savings; and

Be Green” – the installation photovoltaic panels (PV) roof level and the use of electric air source heat pumps (ASHP). An on-site photovoltaic array has been proposed on the roof area of the school. The scheme has modelled 340m2 of PV panels which contribute to an annual yield of 74,125 kWh (59.8 kWp PV array) shows savings of 11.3 tonnes CO2 / annum which is a 38% saving over the Part L2A 2021 Baseline.

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 proposal will achieve an overall CO2 reduction of 41%. In terms of carbon offset, it is estimate that 17.3 tonnes of non-domestic would need to be offset through of site contributions. This is estimated at £49,350. The final offset contribution would be determined after a completed SAP certificate has been provided. The mechanism to secure this would be through the section 106 agreement.

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. Nondomestic 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 110 & 199 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 users and neighbouring 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 have assessed the supporting Air Quality Assessment and raised no fundamental objection subject to imposition of condition requiring the submission of an Air Quality Neutral Assessment to ensure the air quality impacts of construction and is 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, which is now with the GLA.

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 including the MUGA and sports pitch demonstrated that there is a low probability of adverse impact at noise sensitive receptors. The Environmental Health officer has raised no fundamental objection to the proposal and therefore, recommended pre-commencement conditions 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 NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 207 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.
- 10.9.2 NPPF paragraphs 202 and 210 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.
- 10.9.3 If you grant planning consent, paragraph 218 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public
- 10.9.4 Though the application is not in an Archaeological Priority Area, the Greater London Archaeological Advisory Service (GLAAS) has advised that British Geological Survey (BGS) mapping shows this site is located on Black Park Gravels, the oldest gravel terrace of the Thames, representing the river's former course after it was diverted by the Anglian Ice Sheet. Lower Palaeolithic finds have been discovered in

Black Park Gravels, albeit in the remnants of this terrace in the upper and middle Thames Valley to the west.

- 10.9.5 The site appears to have been undeveloped throughout its history, being within the fields related to formerly Squirrel Farm and later Heath House, and a playing field and allotments in the 20th century; MOLA's 2011 assessment does not note any previous known aggregate quarrying in the area; and
- 10.9.6 The groundworks, especially the excavation of the proposed attenuation tank, landscaping and drainage features, as well as foundations and servicing, may impact on these horizons and any archaeological remains if present.
- 10.9.7 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 development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.”* 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

- 10.9.8 A Preliminary Desk Study Report to assess potential contamination risks associated with the site's historical use. The study confirms that the site has historically remained as open land with no evidence of contaminative uses. The Envirocheck Report and historical mapping review also indicates that the site is free from past industrial or potentially contaminative activities.
- 10.9.9 Notwithstanding the low-risk classification, the report recommends that a targeted ground investigation be undertaken during the construction phase to validate the absence of contamination and ensure that any unforeseen contamination is appropriately managed in accordance with Environment Agency guidelines (Model Procedures for the Management of Land Contamination – CLR11). 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 Landscaping, Tree, Ecology/Biodiversity and Greening

Landscape

- 10.10.1 Policy 27 of the Local Plan requires that development must have regard to the character of the landscape and its sensitivity to change and where development is permitted it will need to enhance the locally distinctive character of the landscape; that new development should not be detrimental to distinctive landscape features. Development that would not successfully integrate into the local landscape will not be permitted. Policy 30 supports measures to maintain existing trees and native vegetation, London Plan Policy G7 confirms that *'Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed'*.
- 10.10.2 The proposed landscape scheme seeks to create dedicated play areas for each of the four key stage groups. The landscape strategy creates a sequence of secure, functional, and inclusive outdoor spaces for pupils aged 4–19, ensuring that each key stage has dedicated areas for play, outdoor learning, and sensory activities. External classrooms adjacent to teaching wings provide transitional spaces for pupils to decompress and engage in structured outdoor learning, leading into larger play areas offering both active and passive recreation.
- 10.10.3 The landscape design retains and enhances existing mature trees where possible, supplemented by extensive new planting, including woodland buffers, rain gardens, hedgerows, and over 200 new trees. Public realm improvements to the Balgore Lane frontage include new formal planting, street furniture, and a feature entrance plaza, improving the visual quality and integrating the site with its urban setting.
- 10.10.4 According to the Council's Landscape consultant, *"it is positive to see that landscaping has been incorporated throughout the scheme and that the proposals have been supported by landscape plans and information on landscaping included within the Design & Access Statement. The Design & Access Statement confirms that the scheme has been developed through the pre-application process and quality review panels which is welcomed"*.
- 10.10.5 *"We would encourage further provision of soft landscaping around the entrance to the early years and primary section and the secondary & post-16 student section of the buildings. This will create an attractive and legible entrance for student"*.



10.10.6 To facilitate the aforementioned, a number of new trees and hedgerows are proposed, particularly around the school boundaries. However, planting or greening is also intertwined amongst the built form including the central island of the drop off and within the car parking area. The Council's landscape consultant has raised no objection to the development on landscape grounds, albeit recommended a revised landscape scheme be secured by condition to require amongst other things details of how the proposed rain gardens and swales will be incorporated into the wider landscape design and further details regarding the proposed outdoor dining area and amphitheatre.

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 (50 3 Category A (high value), 8 Category B (moderate value), and 39 Category C (low value) trees, groups, and hedgerows. This assessment has been undertaken in accordance with BS 5837:2012 Trees in relation to design demolition and construction recommendations and confirms that 7 Category C trees, groups, hedgerows require removal to facilitate the scheme. The Council's Arboricultural Consultant has advised that their removal is acceptable provided suitable mitigation planting is undertaken. The consultant further advised that the submitted Landscape Plan indicates a suitable volume of new tree planting to mitigate for the loss of removed tree and noted that some planting are indicated near to the proposed building and hard landscaping or near to retained trees; that no planting is undertaking within 5m of a building to reduce the level of conflict from the tree canopies and roots as the tree grow which can lead to higher pressure for removal. Tree protection measures will be erected and maintained throughout the development to ensure all other existing trees and vegetation is protected.

10.10.10 The Council's arboricultural consultant has raised no fundamental objection to the proposals subject to the protection measures proposed, a scheme of hard and soft landscaping including schedule of plants and trees being secured by condition

Ecology and Biodiversity

10.10.11 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.

- 10.10.12 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.
- 10.10.13 An Ecological Impact Assessment has been submitted and this suggests that no designated sites or priority habitats were identified within or adjacent to the site and proposals are unlikely to impact local designated sites. No habitat on-site were important ecological features. Furthermore, no designated sites within the Zone of Interest would likely be impacted given the lack of connection. 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.
- 10.10.14 A number of recommendations are however made to limit impact and also ensure net benefits as part of the development in the long term. The Council's ecological consultant raised no objection subject to the mitigation measures identified being secured and implemented in full and has recommended biodiversity enhancements – the enhancements should include bat boxes, bird boxes for Priority species, log piles and invertebrate houses in suitable locations. A condition is also recommended in terms of external lighting. Subject to the imposition of the conditions discussed the development is considered to comply with relevant ecological policies

Biodiversity Net Gain (BNG)

- 10.10.15 A comprehensive Biodiversity Net Gain Assessment has been undertaken in accordance with the Environment Act 2021 and DEFRA's Statutory Biodiversity Metric. The site's existing baseline is calculated at 7.10 Habitat Units, with the predominant habitat being modified grassland in poor condition.
- 10.10.16 The development proposals include:
- Planting of 200 new trees (native and ornamental species);
 - Creation of new woodland blocks and rain gardens;
 - Establishment of 0.37km of hedgerows;
 - Enhancement of retained grassland to achieve good condition;
 - Installation of a small ornamental pond within the southern landscape area.
- 10.10.17 On-site measures are forecast to deliver 7.40 Habitat Units, representing a 4.15% net gain, which doesn't not meet the minimum 10% requirement. To achieve the

required minimum 10% BNG, the applicant will secure off-site biodiversity units through a recognised habitat banking provider, ensuring compliance with BNG trading rules.

Urban Greening Factor

- 10.10.18 London Plan Policy G5 requires major developments to incorporate urban greening, such as green roofs, walls, and trees, into their design from the outset. The policy uses an urban Greening Factor (UGF) to evaluate the quantity and quality of new green space, with minimum UGF target scores of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).
- 10.10.19 According to the submitted supporting document including the Design and Access Statement, the proposed development has been designed to maximise urban greening as an integral component of the site's layout and architecture. While there is no specific UGF target for new schools, the scheme aims to achieve a score of 0.36, which exceeds the London Plan benchmark for non-residential developments.
- 10.10.20 The design-building's design incorporates a variety of green infrastructure measures that collectively deliver functional, accessible, and ecologically valuable spaces, including:
- Extensive tree planting, with over 200 new native and ornamental trees introduced across the site;
 - A green roof system covering approximately 1,155sq.m, integrated with photovoltaic panels on Buildings 1 and 3;
 - Rain gardens and swales to manage surface water runoff and provide biodiversity value;
 - Creation of new hedgerows, shrub beds, and groundcover planting to soften building edges and enhance ecological connectivity;
 - Retention and enhancement of existing mature boundary trees wherever feasible.
- 10.10.21 However, GLA's Stage 1 Response requires that *"the applicant should demonstrate that publicly accessible open space, preferably with proposed greening, has been considered as part of the design. This should be demonstrated prior to Stage 2 to determine compliance with Policy G4 of the London Plan"*.
- 10.10.22 Applicant Response: The proposals is for a SEND school and by its nature needs to be secure for the safety and wellbeing of the pupils. This requirement together with the space constraints of the site have resulted in little opportunity to make part of the site open to the public as designated open space.
- 10.10.23 A significant concession that has been made during the development of the scheme has been the entrance approach or school front garden. This semi-public open space helps the site integrate with its surrounding and provides an appropriate public interface with Balgores Lane. Whilst limited in size it contributes positively to the character of the area and provide a social space where parents, carers and visitors can meet and congregate.

11 **Financial and Other Mitigation**

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

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.

Circular Economy

- 12.3 A Circular Economy Statement has been submitted with the application. The statement outlines how the proposed development at Balgore's SEND School integrates circular economy principles through its design, construction, operation, and end-of-life strategies. However, the GLA Stage 1 Response noted that the Circular Economy Statement does not yet comply with London Plan Policy SI7 and that further information is required on design principles, recycling, and operational waste. In response, the applicant has submitted a revised Circular Economy Statement (with revised appendices) and GLA Circular Economy Statement template and completed stage 1 memo with applicant's response addressing the matters raised. This will be included as part of GLA Stage 2 documentations. A condition requiring the submission of a post-construction report is recommended.

12.4 Whole Life Carbon

A Whole Life-Cycle Carbon Assessment (WLCA) has been submitted in support of the application in accordance with London Plan Policy SI 2 and the GLA's Whole Life-Cycle Carbon (WLCA) Guidance (March 2022). The assessment quantifies both embodied carbon (A1-C4) and operational emissions (B6-B7) over a 60-year life cycle. The WLCA states that the initiatives embark upon would deliver a 17%

reduction in total embodied carbon, equating to savings of over 940 tonnes of CO₂e compared to a conventional design. The largest contributors to embodied emissions are product-stage materials (60.4%), specifically MEP systems (21.9%), substructure, and external walls. GLA has recommended that a condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. This has been recommended.

12.5 **Community Use Obligation**

A formal Community Use Agreement (CUA) (a draft of which is submitted in support of this application) will secure community access to designated facilities outside of school hours, in accordance with Havering Local Plan Policy 18 (Community Facilities). The agreement, managed by Astrum Trust, ensures the wider community benefits from the development are secured while safeguarding the needs of pupils with complex SEND are fully considered and maintained.

12.6 The following facilities will be made available for community use:

- Multi-Use Games Area (MUGA)
- Grass sports pitch
- Sports Hall
- Hydrotherapy Pool (for supervised, pre-booked sessions)
- Enterprise Hub (Learning Kitchen) for school-run community events
- Front Garden Recreational Space for informal public use during designated hours

12.7 Public access will be restricted to after-school hours, weekends and school holidays, managed through a booking system with safeguarding protocols in place. Priority will be given to local community and SEN-focused groups. The CUA will set out details of the management, booking, costs and annual review to ensure the CUA continues to meet the needs of the community and school. This will be secured by condition.

13 **Equalities**

13.1 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

13.2 For the purposes of this obligation the term “protected characteristic” includes:- age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

13.3 Policy CG1 of the London Plan also seeks to support and promote the creation of an inclusive city to address inequality. The proposals are clearly providing a much needed facility for pupils with special educational needs.

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

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

14 **Conclusions**

14.1 It is considered that there is clear policy support within the NPPF, London and Local Plans for improved or new education facilities to cater for existing or identified demand. This development would provide a specialised educational facility which on the basis of evidence submitted appears to be urgently needed to meet basic need provision now and in the future

14.2 The proposed artificial pitch is considered to some extent meet one of the exception tests within Sport England's playing fields policy and as such will in part 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.

14.3 It is accepted that there are concerns about the loss of playing field associated with the site as a result of this development, however, the need argument in this instance is considered particularly strong, and in the planning balance, in view of the information provided in terms of the irregular use of the existing playing fields, the new pitch layout and MUGA pitch for the school and community access to the facilities, it is considered that this development overall would bring forward significant benefits to the wider community.

14.4 The proposed school building would achieve a high standard of design that is both sensitive to its open playing field 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.

14.5 It considered that the new school has been both designed in a way to best meet the needs of pupils whilst respecting existing local character. The development would be supported by an appropriate quantum of parking and the Highway Authority has raised no objection on highway safety or efficiency grounds. Taking all factors on board it is considered that the proposed development has sought to provide solutions/compromises where possible and as such embodies the principles of sustainable development.

14.6 The recommendation to grant planning permission has been taken having regard to the National Planning Policy Framework (2024), 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.