

Beal High School, Ilford

in the London Borough of Redbridge

planning application no.1048/11

Strategic planning application stage II referral (new powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

Outline Application: Erection of a new three storey building to school to allow additional four forms of entry. New car park. New vehicular access point on to Woodford Avenue. New pedestrian access to Woodford Avenue.

The applicant

The applicant is **London Borough of Redbridge**, and the architect is **Nightingale Associates**.

Strategic issues

Given the pressure on school places in Redbridge, the impacts on a **Major Developed Site** in the **Green Belt**, whilst regretted, are accepted. Outstanding issues in relation to **playing fields, energy, design, access** and **transport** are addressed satisfactorily.

The Council's decision

In this instance Redbridge Council has resolved to grant permission but giving delegated authority for officers to refuse permission if the Section 106 agreement is not signed within a specified date.

Recommendation

That Redbridge Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1 On 20 May 2011 the Mayor of London received documents from Redbridge Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under Category 3D of the Schedule to the Order 2008: *"Development on land allocated as Green Belt or metropolitan open land in the development plan, and which would involve the construction of a building with a floor space of more than 1,000 square metres or a material change in the use of such a building"* and Category 3C of the above Order: *"Development which is likely to prejudice the use as a playing field of more than 2 hectares of land."*

2 On 29 June 2011 the Mayor considered planning report PDU/2809&2809a/01, and subsequently advised Redbridge Council that the application did not comply with the London Plan, for the reasons set out in paragraph 68 of that report and some further information and commitments were required.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised in response to the Mayor's concerns (see below). On 25 August 2011 Redbridge Council decided that it was minded to grant planning permission but giving delegated authority for officers to refuse permission if the Section 106 agreement is not signed within a specified date, for the revised application, and on 27 November 2011 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged or direct Redbridge Council under Article 6 to refuse the application. The Mayor has until 9 November 2011 to notify the Council of his decision and to issue any direction.

4 The decision on this case and the reasons will be made available on the GLA's website www.london.gov.uk.

Update

5 The Stage 1 report related to two alternative outline applications. The Sinclair House application has been withdrawn and therefore this report deals with the Beal High School application only.

6 At the consultation stage Redbridge Council was advised that the application did not comply with the London Plan, for the reasons set out in paragraph 68 of that report and some further information and commitments were required as stated below:

- **Playing fields:** Additional information is required in relation to future sports provision given the loss of playing fields. There is major strategic concern in regard to the loss of playing fields. The scheme complies neither with the London Plan nor with policies of Sport England. Additional information is required in relation to this matter.
- **Urban design:** There are design concerns that should be addressed as detailed in the report. As it stands the proposals do not comply with the London Plan.
- **Access:** The applicant should provide an access statement and detailed drawings demonstrating the proposals meet the inclusive design policies of the London Plan.
- **Sustainable development:** The applicant is required to submit an energy statement. As it stands the proposals do not comply with the London Plan.
- **Transport:** The applicant should address the issues raised in the transport section of this report.

Playing fields

7 The loss of playing field was a major strategic concern in regard to the proposed development. The proposal involves the loss of a substantial area of school playing fields and thus it is contrary to the London Plan policies 3.18, 3.19, 7.16, 7.17 and 7.18 which resist proposals

that result in a net loss of sports and recreation facilities, including school playing fields. Sport England shared these concerns and had objected to the proposal.

8 However, it is noted that the school playing fields are poor quality, have an undulating surface, poor drainage and hazardous, uneven surfaces. The school has concerns about their safety as playing fields and there have been recent incidents of injuries to children playing on them. The poor condition of the playing fields has arisen from the previous use of the site for landfill.

9 It is evident from an illustrative drawing that the school's playing field is large enough to accommodate a number of artificial grass 5-a-side pitches, a full-size artificial grass pitch and a pavilion, in addition to several natural turf playing pitches. Sport England considers that such a mix of provision could be very beneficial for sports development and against this background it has set out that it would be prepared to withdraw its objection subject to planning conditions it specified being attached to any planning permission.

10 The Council has imposed all the five conditions specified by Sport England and these are as follows:

- Detailed assessment of ground conditions of the playing field land shall be undertaken (including drainage and topography); based on the results of the above assessment, a detailed implementation scheme for the improvement and maintenance of the playing fields, necessary to bring them to an acceptable quality, shall be submitted to and approved in writing by the Local Planning Authority after consultation with Sport England.
- The playing field and natural turf playing pitches shall be constructed and laid out in accordance with the standards and methodologies set out in the Design Guidance Note "Natural Turf for Sport" (Sport England, May 2011), and made available for use prior to the completion of the permitted development. The playing fields shall thereafter be improved and maintained in accordance with the approved scheme.
- The playing field shall be used for Outdoor Sport and for no other purpose (including without limitation any other purpose in Class D2 Use Classes Order 2005, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).
- Detailed proposals for any new sports facilities (including artificial grass pitches, 5-a-side pitches, multi-use games areas and sports halls) shall comply with the standards set out in Sport England's Design Guidance Notes or those of the relevant sport's National Governing Body.
- Prior to the completion of the permitted development, a Community Use Scheme for the sports facilities (including the sports hall and playing pitches) shall be submitted to and approved in writing by the Local Planning Authority, in consultation with Sport England. The Scheme shall include details of pricing policy, hours of use, access by non-school users/non-members, management responsibilities and include a mechanism for review. The approved Scheme shall be implemented upon commencement of use of the development.

11 Given the additional information provided in respect of the current pitches, the views of Sport England following the imposition of conditions and the provision of community access strategy the outstanding issues in relation to playing fields are resolved satisfactorily.

Urban design

12 Design comments during Stage 1 consultation suggested changes to the layout, including the access and service arrangement, parking and vehicular circulation. Further information was also required on the proposed creation of a roundabout.

13 After liaising with the applicant and the Council during the Post Stage 1 negotiations, further justification of the layout has been received. In addition, further conditions in relation to the protection of the trees located on the boundary with Woodford Avenue and between the proposed building and the existing school, and cutting back vegetation to improve visibility at the crossing on Woodford Avenue have been imposed.

14 The provision of a landscape strategy which expressly covers the inclusion of soft landscaping to break up the hard standing in the parking areas has also been secured by condition.

15 As a result, outstanding issues in relation to urban design have been resolved satisfactorily.

Access

16 Given that this is an outline application it is accepted that a detailed access statement cannot be submitted at this stage. That said, the submission of such details has been secured by condition and this is acceptable.

Sustainable development

17 Since the Stage I report and the determination of the application by Redbridge Council an energy strategy has been submitted. The strategy does not fully comply with the London Plan as the proposed development does not appear to achieve any carbon savings from energy efficiency alone compared to a 2010 Building Regulations compliant development and the statement ambiguous regarding commitments that are made. In addition two alternative renewable heating options are proposed and the biomass option may have negative air quality implications. Given that this is an outline application it has been agreed with the Council and the applicant that the outstanding issues will be dealt with by conditions which will ensure that at detailed stage the energy strategy will comply with the London Plan.

18 As such the following conditions are imposed:

- The detailed design of the development should exceed 2010 Building Regulations compliance through energy efficiency alone.
- If the biomass boiler option is pursued at detailed design stage a full air quality impact assessment should be provided and if this shows a negative impact on air quality the alternative option should be implemented.
- The development will be designed to allow future connection to a district heating network should one become available.

19 As a result, outstanding issues in relation to energy have been resolved satisfactorily.

Transport for London's comments

20 At Stage 1, TfL advised that while the design of the proposed site access onto Woodford Avenue was supported in principle, there was however still some outstanding issues which would need to be addressed as part of the detailed design stage before considering it acceptable. It was also highlighted that the applicant would be required to enter into a s278 agreement with TfL in order to implement the necessary works on the highway, and to mitigate the potential loss of trees

on the Transport for London Road Network. In addition to recommending that a pedestrian audit be undertaken, and advising that cycle parking was not in accordance with London Plan standards, TfL also requested that an updated school travel plan, construction logistics plan and delivery and servicing plan all be secured for the site by condition.

21 While no additional information has been submitted since Stage 1, TfL is nevertheless broadly satisfied that the above concerns have been adequately addressed through the boroughs planning committee report which secures by way of condition, the requirement for i) the approval of reserved matters for the means of access to the site and the site layout, ii) the provision of car and cycle parking to be in accordance with London Plan standards, iii) the provision of a scheme for the protection of trees, iv) a scheme for the control of construction activity and traffic, v) a delivery servicing plan, and vi) a travel plan, all to be submitted and approved by the local planning authority prior to commencement and/or first occupation on site. It is also understood that a pedestrian audit has been undertaken since Stage 1, and as such, TfL supports the condition which requires the identified pedestrian improvements to be carried out prior to first occupation on site. It should be noted however that where improvements are required on the Transport for London Road Network, TfL's approval will also be required.

22 While it is acknowledged that approval for the site access and car parking arrangements will be dealt with by reserved matters, it should however be noted that the applicant will be required to enter into a s278 agreement in order to undertake any works to the public highway. Such agreement will therefore need to be agreed with TfL in advance of any works being undertaken on the Transport for London Road Network.

23 In summary, TfL is satisfied that the issues previously raised have been satisfactorily addressed, and that the application could now be considered to be in accordance with the transport policies of the London Plan.

Response to consultation

24 There were no comments received from local occupiers.

Statutory and Non-Statutory Consultation Replies

25 **Sport England:** Sport England in its letter of 19th August has set out the conditions that should be attached to the grant of permission in order that it could withdraw its objections. The Council imposed all the suggested conditions (as detailed above).

26 **Environment Agency:** Initially objected to the scheme due to the non submission of a flood risk assessment. However, the Agency, in its letter sent to the Council on 18 August 2011 set out that three conditions should be attached to the draft decision notice in order for it to withdraw its objection. These have been included.

27 **Thames Water:** Thames Water stated that surface water drainage is the responsibility of the developer; prior approval from Thames Water is required to discharge to public sewer; groundwater discharge permit may also be required; no building to be over line or within 3m of public sewer crossing site; no objection regarding water infrastructure. The Council has imposed appropriate conditions in relation to surface water drainage in line with sustainable drainage principles.

Legal considerations

28 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. The

Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice.

Financial considerations

29 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 03/2009 (*'Costs Awards in Appeals and Other Planning Proceedings'*) emphasises that parties usually pay their own expenses arising from an appeal.

30 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

Conclusion

31 The proposed development will bring substantial regenerative benefits to the outdated playing fields in the school and increase the capacity of the school in area where this is needed. Outstanding strategic issues in relation to playing fields, energy, design, access and transport are resolved satisfactorily. Overall, the scheme is supported in strategic planning terms and it complies with the London Plan 2011.

Beal High School & Sinclair House, Ilford

in the London Borough of Redbridge

planning application no.1047/11 &1048/11

Strategic planning application stage 1 referral (new powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposals

1. Outline Application: Erection of a new three storey building to school to allow additional four forms of entry. New car park. New vehicular access point on to Woodford Avenue. New pedestrian access to Woodford Avenue.
2. Outline Application: Demolition of Sinclair House. Erection of new three storey building to create additional facilities for Beal High School to allow additional four forms of entry. New sports hall building. New car parking.

The applicant

The applicant is **London Borough of Redbridge**, and the architect is **Nightingale Associates**.

Strategic issues

Given the pressure on school places in Redbridge, the impacts on a **Major Developed Site** in the **Green Belt**, whilst regretted, are accepted. However, additional information is required in relation to future sports provision given the loss of **playing fields**. However, the loss of **community facilities** is not acceptable. Also, there remain concerns in relation to **equal opportunities, urban design, inclusive design, climate change mitigation and adaptation, and transport and parking**, which should be addressed before the application is referred back to the Mayor.

Recommendation

That Redbridge Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 68 of this report and some further information and commitments are required. The application does not need to be referred back to the Mayor if Redbridge Council resolve to refuse permission, but it must be referred back if Redbridge Council resolve to grant permission.

Context

1 On 20 May 2011 the Mayor of London received documents from Redbridge Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of

London) Order 2008 the Mayor has until 30 June 2011 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3D of the Schedule to the Order 2008: *"Development on land allocated as green belt or metropolitan open land in the development plan, and which would involve the construction of a building with a floor space of more than 1,000 square metres or a material change in the use of such a building."* and Category 3C of the above Order: *"Development which is likely to prejudice the use as a playing field of more than 2 hectares of land."*

3 Once Redbridge Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal; or allow the Council to determine it itself, unless otherwise advised. In this instance if Redbridge Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 Beal High School occupies an area of approximately 15.8 hectares on a site designated as Green Belt and the site aligns along a north west/south east axis. Along the eastern boundary of the site lies the A1400 Woodford Avenue, a busy dual carriage way. The main school frontage and southern boundary of the site is enclosed by Woodford Bridge Road and the western boundary adjoins Sinclair House, a Jewish community centre to the south west, which would be demolished under Option 2). There is a farm to the far north of the open fields.

6 11.0 hectares of the site area is given over to playing fields located to the north of the existing school buildings. However, there is no direct access from any adjacent roads to the playing fields; access can only be gained via the school. The majority of the school buildings lie to the south of the site within an area bounded by an east-west tree belt.

7 There are currently two southern vehicular access points onto the site from Woodford Bridge Road with a potential third access, which used to be used for car parking but has been converted to a garden area. There is no access (emergency or otherwise) to the rear of the site and the playing fields. This lack of emergency access has been highlighted as an issue which the school would like to improve upon with any new development.

8 The site is located on the A1400 Woodford Avenue and is in close proximity to the A406 North Circular, both of which form part of the Transport for London Road Network (TLRN). The site is served by two bus routes, with the nearest stops located approximately 300 metres away on Woodford Avenue. There are no rail services located within an acceptable walking distance of the site, and as result it has been demonstrated that the site records a very poor public transport accessibility level of 1, on a scale of 1-6, where 6 is the highest.

Details of the proposal

9 The applications have been submitted as for the last ten years, Redbridge Council have been projecting a need for additional school places. The Council is meeting its need for primary places but this leads to future demand in the secondary school sector.

10 The current forecasts are that even including the places from a new Academy there will be a need for a further 4 forms of entry in 2013.

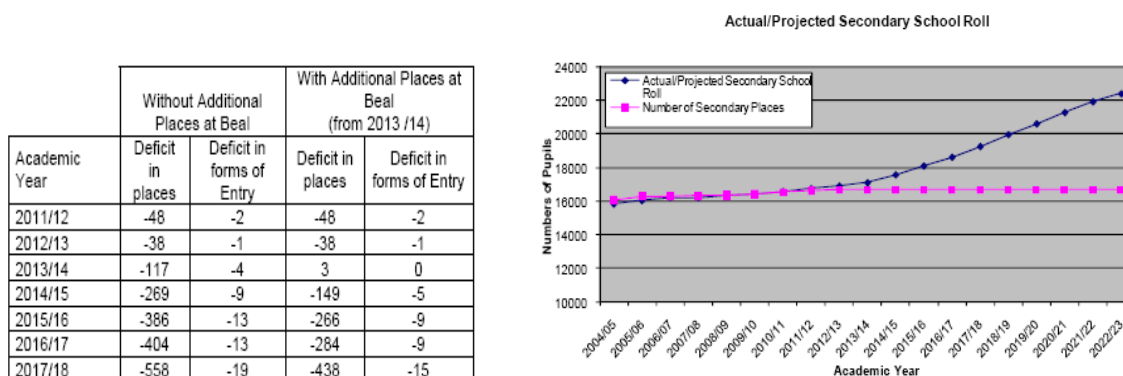


Table and Graph showing the projections (Source: applicant's planning statement)

11 Given these projections (as shown in the Table and the graph) and the criteria including site selection for developing schools, Beal High School was considered the most appropriate location to support the need for additional places in 2013.

12 The proposed development which forms the base of this outline planning permission is to provide a new building on the fields to the north of the existing school buildings at Beal High School. The new building is required to provide the equivalent of an additional 4FE in addition to the existing 8FE provision at the School currently. The proposed new building requires 9100m² of additional teaching floor space. The footprint of the proposed new build is 4,801sqm.

13 The proposal for this Outline Planning Application (1) is to design a part two storey and part three storey stand alone new build on the playing fields and incorporates new car park and new vehicular access point on to Woodford Avenue and new pedestrian access to Woodford Avenue.

14 Outline Application (2) comprise the demolition of Sinclair House, in order to erect a new three storey building to create additional facilities for Beal High School to allow additional four forms of entry. New sports hall building and new car parking are also proposed.

Case history

15 There is no case history relevant to the current proposals.

Strategic planning issues and relevant policies and guidance

16 The relevant issues and corresponding policies are as follows:

- Education/community facilities *London Plan; Ministerial statement July 2010*
- Green Belt *London Plan; PPG2*
- Playing fields *London Plan; PPG17, draft PPS Planning for a Natural and Healthy Environment*
- Urban design *London Plan; PPS1*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*

- Sustainable development *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor's Energy Strategy; Mayor's draft Climate Change Mitigation and Adaptation Strategies; Mayor's draft Water Strategy; Sustainable Design and Construction SPG*
- Transport and parking *London Plan; the Mayor's Transport Strategy; PPG13*

17 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plans in force for the area are the Core Strategy and the Borough Wide Primary Policies Development Plan Documents (adopted in 2008) and the London Plan (Consolidated with Alterations since 2004).

18 The draft replacement London Plan, which underwent Examination in Public in 2010 and upon which the Panel has now reported is a relevant material consideration of significant weight.

Principle of use – education/community facilities

19 In relation to the provision of educational facilities, Policy 3A.24 of the London Plan states that UDP policies should reflect the demand for school facilities, taking into account GLA demographic projections, and should ensure adequate provision in partnership with the local education authority, local strategic partnerships and users.

20 The London Plan reiterates the need of expanding educational capacity as outlined within the supporting text of London Plan (2008) Policy 3A.24, by 2016, London's School age population is projected to increase by almost eight percent and as a result Boroughs should ensure adequate school provision to cope with this increase.

21 The principle of use which is education has been established on the site for a long time and the extension of the High School for teaching purpose/education is supported. Additionally, as referred to above the Council has a need to provide additional school places.

22 The proposal which involves the demolition of Sinclair House (a Jewish Community Centre), is not acceptable. The applicant has not provided sufficient information in regard to the future provision of community facilities. As the proposal stands, this would be contrary to London Plan policy 3.17 'Protection and enhancement of social infrastructure'. In addition, the applicant should submit an Equality Impact Assessment (EqIA) Report.

Green Belt and visual impacts

23 The application site is part of a larger area designated as Metropolitan Green Belt in a major developed site. Policy 3D.9 of the London Plan clearly indicates that green belt is to be protected from inappropriate development, and such inappropriate development should not be approved except in very special circumstances. Any development proposal must demonstrate that there is no adverse impact on the open character or function of the surrounding green belt.

24 The London Plan also makes clear that London's growth should be sustainable and not encroach on London's own precious green spaces (paragraph xi). The reference to "inappropriate development" flows directly from PPG2, which sets out the government's policy towards Green Belt. This policy is one of the most robust and enduring in the planning system. The draft replacement London Plan (October 2009) reinforces this principle in Policy 7.16.

25 However, Annex C of PPG2 contains specific guidance on development at Major Developed Sites in the Green Belt. This states that at identified Major Developed Sites infilling or

redevelopment which meets the criteria in paragraphs C3 or C4 is not inappropriate development in the context of development in Green Belts.

26 As the application site is on Green Belt, in a major developed site the proposal needs to be tested against para C3 on 'infilling' that refers to developments that have no great impacts on purposes including land on Green Belt, not exceed the height of the existing buildings, not lead to a major increase in the developed proportion of the site. In this context the proposed scheme will have negligible increase in height of the existing buildings as the proposal is for two and three storeys in height similar to the existing built form. However, the increase in footprint and floor space in both options is significant in particular the one with the use of playing fields leading to a major increase in the developed portion of the site. The footprint of the new building would be 4,801sqm. This is accepted given the above impacts on a Major Developed Site and the pressure on school places.

27 In addition, the applicant is required to provide a clear statement on the order of preference on the proposed options from a planning perspective as well as educationally and financially. The applicant could not confirm this in the discussions held during a site visit.

Playing Fields

28 The proposed scheme involves the loss of playing fields which is contrary to the policy 7.16 'Green Belt' of the London Plan.

29 In addition, Sport England in its letter Ref: L/RD/2011/24511/S sent to Redbridge Council on 02 June 2011 objected to the proposal because it is not considered to accord with any of the exceptions in Sport England's playing fields policy. Furthermore, it is considered to conflict with paragraph 15 of PPG17: Planning for open space, sport and recreation, and that the application documents appear to make no reference to this guidance.

30 As it stands the proposed scheme is not acceptable in terms of the loss of playing fields. The Council has advised that it is in discussion with a provider of synthetic playing surfaces and there is the option of enhanced use of the existing playing fields that would not be affected by this proposal. However, significant further information is required in relation to this matter.

Urban design

31 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the Blue Ribbon Network. The draft replacement London Plan reinforces these principles, with new development required to have regard to its context, and reinforce or enhance the character, legibility and permeability of the neighbourhood (policy 7.1).

Outline application 1:

Layout

32 A clear design strategy of either, locating the building so that it fronts the street and provides overlooking and enclosure and minimises greenbelt encroachment, or being set back so

that it is not visible from Woodford Bridge Avenue, reducing the levels of noise from the road as well as its visual impact would be preferred.

33 The location of the entrance on Woodford Avenue is supported, as this may help to add life to the public realm and rebalance the currently vehicular dominated environment.

34 The proposed layout includes a significant area of parking and vehicular circulation. This is currently located between the building and southern boundary of the site. Whilst this location ensures that this area is tucked away from the green belt, it will have a significant impact on Woodford Avenue, undermining the quality of views of the greenbelt from the public realm.

35 The proposed access and service arrangement takes up a large amount of the site. It currently accommodates circulation of private cars to the car park, circulation of service vehicles and a large delivery bay. A more rational design approach to this, where vehicles have a separate entrance and exit would minimise this land take and not necessitate the provision for turning circles of coaches and refuse lorries within the site. This will reduce the amount of land take, hard standing and vehicular movement in the site. Further consideration of this arrangement is required.

36 There is mention of a roundabout to “swiftly direct any traffic on and off the site” but there is no indication of this on the drawings. There would be concern about creating a roundabout as this would significantly undermine ease of pedestrian access and undermine the quality of the environment. Further information is required.

Height and massing

37 The proposal is for a single ‘L’ shaped building of two and three storeys in height. There is no concern over the height and massing of the building as this is in keeping with the neighbouring buildings.

Outline application 2: Sinclair House

Height and massing

38 The proposed building is made up of a linear three storey block accommodating most of the school facilities and a separate block accommodating a sports hall. There is no concern over the height and massing of these buildings as they are in keeping with the neighbouring school buildings and contribute to enclosing and overlooking Woodford Bridge Road.

Layout

39 The building is laid out parallel to Woodford Bridge Road and set back approximately 20m from the back of the footway. The area between the building and the footway is used partly as an external dining area and partly as car parking and access. The linear arrangement of the building contributes well to providing enclosure and overlooking of the public realm and presents an efficient use of the site. However, positioning the building closer to the back of the footway and moving the activities at the front of the building to the rear, would significantly improve its relationship to the street. This would also provide the opportunity to locate some of the car park behind the building so it is not visible from the street and allow the external dining area to be located adjacent to the green belt contributing to maintaining its openness. Consideration should be given to this alternative layout.

40 There is concern over the location and arrangement of the 51 space car park on the site. Its location adjacent to Woodford Bridge Road undermines the quality of the public realm, and although some screening is provided further consideration is required. Locating the car park at the

rear of the building would be the most effective way of reducing its impact on the public realm, but providing tree planting within the car park itself will also mitigate this.

Access

41 Inclusive design principles if embedded into the development and design process from the outset help to ensure that all of us, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan Policy 4B.5 (and Policy 7.2 in the Draft Replacement London Plan) is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum).

42 The applicant has not submitted an access statement. It is only explained in the planning statement section 6 that disabled people can easily access the new school building through a levelled entrance, there are no steps within the proposed new building and all floors between zones are level. The 'Equality Access' states " We intend to ensure that the new building achieves its full potential for accessibility in the context of the Equality Act through consideration of the recommendations made in BS 8300, Part M of the Building Regulations and current best practice. This requirement for inclusion and access we have started from the perimeter of the site right through into the interiors."

43 It is understood that the proposed scheme has the potential to be very accessible but the above statements do not currently demonstrate how the scheme meet the highest standards of accessible and inclusive design as required by the London Plan. Therefore the applicant is required to submit an access statement with detailed illustrative drawings.

44 As it stands the proposals do not comply with the inclusive design policies of the London Plan.

Sustainable development

45 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies with a target of 20% carbon reductions from on-site renewable energy. The policy sets out ways in which developers must address mitigation of and adaptation to the effects of climate change. Chapter 5 of the draft replacement London Plan considers climate change.

Climate change mitigation

46 The applicant should provide an energy assessment addressing the energy policies contained in the London Plan. The energy assessment should address the individual element's of the Mayor's energy hierarchy which requires developments to provide proposals which: 1) use less energy, 2) supply energy efficiently, and 3) use renewable energy. The assessment should follow the detailed guidance given in the 'GLA Energy Team Guidance on Planning Energy Assessments.' While accepting the constraints relating to outline planning applications, it should contain firm commitments in relation to what is planned for the development.

Climate change adaptation

47 The London Plan promotes five principles in policy 4A.9 to promote and support the most effective adaptation to climate change. These are to minimise overheating and contribution to heat island effects, minimise solar gain in summer, contribute to flood risk reductions, including

applying sustainable drainage principles, minimise water use and protect and enhance green infrastructure. Specific policies cover overheating, living roofs and walls and water. Chapter 5 of the draft replacement London Plan considers climate change adaptation. The energy statement / sustainability assessment should also incorporate these issues.

48 As it stands, the proposals do not comply with the energy policies of the London Plan.

Transport for London's comments

49 95 new car parking spaces are being proposed to facilitate the extension of the school, which will result in 120 additional teachers being employed on site. While no car parking standards are included in the current or draft replacement London Plan for this particular land use, this level of provision is ultimately considered acceptable, given the relatively inaccessible location of the site.

50 Based on the methodology presented in the transport assessment for trip generation and modal split, TfL is satisfied that the proposed development would not negatively impact on the A1400 Woodford Avenue in terms of capacity. It is however inevitable that the proposed new vehicle access may impact on the operation of Woodford Avenue, and therefore the management and design of the proposed access must be in accordance with best practice, in order to minimise the potential impact to TLRN, in line with draft replacement London Plan (DRLP) Policy 6.11 'Smoothing traffic flow and tackling congestion'.

51 TfL has been involved in pre-application discussions with the applicant in relation to the site access arrangements, and while TfL has approved the design in principle, there remain some issues which still need to be addressed in order for it be considered fully acceptable, as further detailed in TfL's letter to the borough dated 14th June 2011. While it is acknowledged that some of these may be addressed at the detailed design stage, it should however be noted that in order to undertake these works, the applicant will be required to enter into an s278 Agreement with TfL, in order to obtain the relevant scheme approvals under existing highway and traffic legislation, and to provide adequate mitigation measures over the potential loss of trees on the TLRN (although this is subject to further discussion with TfL).

52 It was understood from pre-application discussions that the proposed new car park and drop off / pick up area, which would be directly accessed from the TLRN, would only be made available for use by staff and students expected to be specifically accommodated within the new building. TfL questions how this will be enforced. This has not been clearly stated in the submitted transport assessment, and clarification is therefore required as to how many vehicular trips are expected to enter and exit the car park via the proposed access to / from the A1400 Woodford Avenue. While TfL has agreed with the applicant an 'in principle' possible layout for the eventual future access to the proposed car parking areas, this is however still subject to the above information being provided to TfL's satisfaction.

53 It is also requested that road safety training be provided for pupils, and that the proposed car park access be manned by staff, in order to prevent students from entering and exiting the site via Woodford Avenue, which is intended to be a vehicular access only. It is recommended that such a measure be included in the updated School Travel Plan, to be secured for the site by condition.

54 While TfL would suggest that the method used to determine bus trip generation is not particularly robust, especially if the larger school results in a wider catchment area and the Travel Plan is successful, it is nevertheless satisfied that the proposed development would be unlikely to negatively impact on the capacity of local bus services.

55 Given the large number of students expected to access the site on foot, TfL would recommend that an audit of the pedestrian environment (with PERS being the preferred method) is undertaken between the site and local amenities, such as the nearby bus stops, in order to identify any areas in need of improvement. Where improvements are required, TfL would recommend that a contribution towards addressing these is secured through the s106 agreement, in accordance with policy 6.10 'Walking', of the DRLP.

56 80 cycle parking spaces are currently being proposed, which falls short of the London Plan standards, which requires the provision of 96 spaces to accommodate the additional 960 staff and students expected on site. TfL would therefore strongly recommend that this is reviewed, in order to provide an additional 16 spaces, in accordance with policy 6.9 'Cycling', of the DRLP. As an absolute minimum, TfL would require the current level of provision to be monitored through the Travel Plan, with additional spaces being provided as and when they are needed. As such, it will need to be ensured that there is sufficient land available for the additional spaces to be provided on site from the start, should they prove necessary. The transport assessment states that shower, changing and locker facilities will be provided for members of staff wishing to cycle to work, and while this is supported, TfL would however question if these (or alternative facilities), would also be available for use by the students.

57 It is noted that there is an existing School Travel Plan in operation for the site, and as such, TfL requests that this is updated accordingly, prior to first occupation of the extended site. This requirement should be secured either by condition or through the s106 agreement

58 In accordance with policy 6.14 'Freight', of the DRLP, TfL requests that a construction logistics plan and delivery and servicing plan, both be secured for the site by condition. As part of this, TfL would recommend that servicing by large goods vehicles (those above 7.5 tonnes) is undertaken outside the school run hours wherever possible, in order to minimise the potential for conflicts with students and other vehicles during these peak periods.

59 In summary, while TfL is satisfied that the proposed development is unlikely to negatively impact on the capacity of the strategic highway, or public transport network, additional information, as further detailed above is however required, in order to confirm that the development is in general conformity with policies 6.9, 6.10, 6.11 and 6.14 of the DRLP. It should also be noted that TfL's comments are broadly the same in both cases.

60 It should be noted that since the proposed vehicular access for the Sinclair House application (i.e. option 2) would be on Woodford Bridge Road, which is part of borough's local highway network; the comments related to the proposed vehicular access on to the A1400 Woodford Avenue and the car parking layout would not apply for this instance.

Local planning authority's position

61 Redbridge Council officers have yet to confirm their position.

Legal considerations

62 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no

obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

63 There are no financial considerations at this stage.

Conclusion

64 London Plan policies on education/community facilities, Green Belt, playing fields, equal opportunities, urban design, access, sustainable development and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Principle of use/education/community facilities:** Whilst education use is acceptable, the loss of community facilities requires further examination.
- **Green belt:** Given the pressure on school places in Redbridge, the impacts on a Major Developed Site in the Green Belt, whilst regretted, are accepted
- **Playing fields:** Additional information is required in relation to future sports provision given the loss of playing fields. There is major strategic concern in regard to the loss of playing fields. The scheme complies neither with the London Plan nor with policies of Sport England. Additional information is required in relation to this matter.
- **Urban design:** There are design concerns that should be addressed as detailed in the report. As it stands the proposals do not comply with the London Plan.
- **Access:** The applicant should provide an access statement and detailed drawings demonstrating the proposals meet the inclusive design policies of the London Plan.
- **Sustainable development:** The applicant is required to submit energy statement. As it stands the proposals do not comply with the London Plan.
- **Transport:** The applicant should address the issues raised in the transport section of this report.

69 On balance, the application does not comply with the London Plan.

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