

Mayfield School, Pedley Road, Goodmayes

in the London Borough of Redbridge

planning application no.2086/11

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 (revised): Erection a three storey classroom building to accommodate four additional forms of entry, sports hall and two multipurpose games areas. New vehicular and pedestrian access from Mayfield Road and Kinfauns Road. (Emergency and delivery access only). Associated changes to car parking layouts.

The applicant

The applicant is **Children's Services London Borough of Redbridge**, and the architect is **Nightingale Associates**.

Strategic issues

Outstanding issues in relation to **playing fields, climate change mitigation and adaptation, design, access, and transport** are now resolved 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.

Context

1 On 20 October 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 3C of the Schedule to the Order 2008: "Development which is likely to prejudice the use of a playing field of more than 2 hectares of land."

2 On 23 November 2011 the Mayor considered planning report PDU/2868/01, and subsequently advised Redbridge Council that the application did not comply with the London Plan, for the reasons set out in paragraph 48 of the above-mentioned report; but that the possible remedies set out in paragraph 50 of that report could address these deficiencies.

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 18 April 2012 Redbridge Council decided that it was minded to grant planning permission for the revised application, and on 26 April 2012 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 Council under Article 6 to refuse the application. The Mayor has until 9 May 2012 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 Summary of the proposals in the revised scheme:

- Outline application for the erection of a three storey classroom building to accommodate four additional forms of entry, sports hall and two multipurpose games areas.
- This will result in an increase in school pupils from 1450 to 2520 with an additional 80 staff.
- Building footprint is reduced by 0.34 hectares than the original submission, and the proposed buildings are positioned closer to the existing school buildings, but there is a slight increase in height in part of the building (from part two part three to three storeys).
- Improved pedestrian and cycle access from Mayfield Road and Kinfauns Road.
- 109 car parking spaces and 140 cycle spaces.

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 48 of the above-mentioned report; but that the possible remedies set out in paragraph 50 of that report could address these deficiencies:

- **Playing fields:** Loss of playing fields should be minimised and further justifications and measures required for the improvement of the quality of sports provision.
- **Climate change mitigation and adaptation:** Submit a full energy strategy which addresses the Mayor's energy hierarchy in line with the GLA energy guidance. Agree to conditions that secure the proposed mitigation measures. Engage with Thames Water. Reconsider the provision of green roofing.
- **Design:** Provide further information.
- **Access:** Provide detailed drawings and layouts that demonstrate the incorporation of inclusive design.
- **Transport:** Address concerns in relation to car parking and travel demand, walking and cycling, and travel plans.

Playing fields

7 The concerns raised in relation to playing fields are now resolved. Building footprint is reduced by 0.34 hectares than the original submission, and the proposed new classroom block will now be located in line with, and to the north west, of the existing school buildings. As such, no playing pitches will be prejudiced.

8 Sport England has stated that it does not wish to raise objection provided that conditions attached to any permission in regard to size, scale, location and specification of all sports related development to be submitted and approved by the local planning authority prior to the commencement of development.

9 The Council has imposed appropriate conditions in this regard so that full details of the size, location and specification of the proposed sports hall, two multi-use games areas (MUGAs), artificial grass pitch (AGP) and habitat area will be submitted at reserved matters stage or through separate planning applications. This is welcomed, and the proposal is accepted.

Climate change mitigation and adaptation

10 The applicant has now submitted a full energy strategy addressing the Mayor's energy hierarchy in line with the GLA energy guidance.

11 The applicant is committed to the development's carbon dioxide emissions being reduced below those of a 2010 Building Regulations compliant development through energy efficiency measures alone. The strategy has demonstrated 25% improvement on 2010 Building regulations in the reduction of carbon dioxide emissions and range of on-site renewable energy technologies are proposed (to install either biomass boiler or ground source heat pumps, with 700 sq.m. of photovoltaic panels).

12 The applicant has now incorporated green roofing in the proposal and it has demonstrated its engagement with Thames Water as detailed below in the representation section.

13 Appropriate conditions securing the proposals are imposed. The scheme is compliant with the energy policies of the London Plan.

Design

14 Further information and revised drawings are provided. Although in the revised scheme the proposed building height increased marginally compared to the earlier proposal (part two part three storey), its impacts are limited as the footprint of the proposed building is reduced and positioned closer to the existing school building. This is welcomed.

Access

15 Indicative detailed drawings and layouts are provided and they demonstrate that inclusive design is incorporated. This is welcomed.

Transport for London's comments

16 At stage 1 TfL requested further information regarding existing parking provision. TfL subsequently suggested that car parking should be capped at 80 spaces, with the capacity to provide extra parking if it was found to be necessary, in order to promote more sustainable travel modes to/ from the site from the outset. 109 car parking spaces are to be provided however, and TfL understands the extra provision was considered necessary in order to reduce on street parking, which currently acts as an obstacle for pedestrians, and creates a blind spot. The Council has

confirmed blue badge parking will be secured as part of the approved transport assessment. This is acceptable.

17 At stage 1 the applicant proposed to provide shower and changing facilities to encourage cycling to / from the development, the Council has confirmed these facilities will be secured as part of the detailed permission. TfL would however recommend that use of the proposed cycle parking is monitored through the school travel plan and increased in line with demand, as necessary.

18 Electric vehicle charging points, cycle parking, an updated school travel plan, a service management plan and a construction logistics plan have also been secured by condition, all of which is welcomed by TfL

19 The applicant provided a comprehensive pedestrian audit as requested, which identified a number of required improvements to key pedestrian routes in the area. The necessary improvements to local Redbridge borough roads have subsequently been secured by condition, along with the requirement for all measures to be implemented prior to first occupation of the new school buildings, which is supported.

20 TfL are satisfied that all matters raised at stage 1 have been appropriately resolved and the proposed development is London Plan compliant.

Response to consultation

21 All adjacent neighbours were sent letters of notification, and a site notice was placed on site detailing the development.

22 **Residents:** Occupiers of 9, 31, 43 Fiennes Close, 23 Mayfield Road and 126 Kinfauns Road objected to the proposal. Their objections can be summarised as follows:

- increased impact on parking, traffic and safety around the area for residents and pedestrians, during the peak school hours and new access of emergency vehicles on Kinfauns Road;
- loss of view due to the 3-storey building, proposed building would lead to the loss of light to the rear of the playing field, and lack of tree planting, and
- working hours of builders during construction.

23 The concerns that have strategic planning importance have been dealt in this and the previous reports and those which have only local planning significance have been addressed in the Council's planning report.

24 **Key statutory consultees:**

Sport England: No objection to the revised proposal subject to conditions being attached, requiring full details of the size, scale, location, surface type, and specification of all sports related development to be submitted and approved by the local planning authority prior to the commencement of development. In response, appropriate conditions are imposed, which is welcomed.

Environment Agency: The EA removed its previous objections after assessing the revised scheme. However, it suggested a condition on surface water drainage in which the Council has imposed.

Metropolitan Police: The Met Police confirmed that Secured by Design Principles are followed, with particular emphasis on IT security.

London Fire and Emergency Planning Authority: Access for fire brigade vehicles is required to 50 % of the perimeter of the proposed building unless fire mains are provided. Appropriate condition is imposed securing the above requirement.

Thames Water Utilities: The Thames Water comments suggest informatives to be included in the decision notice relating to waste; surface water drainage; piling and sewerage infrastructure. These are noted in the informatives.

Legal considerations

25 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

26 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.

27 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

28 Outstanding issues raised at Stage 1 are resolved. The proposed scheme is acceptable in strategic planning terms.

for further information, contact Planning Decisions Unit:

Colin Wilson, Senior Manager – Planning Decisions

020 7983 4783 email colin.wilson@london.gov.uk

Justin Carr, Strategic Planning Manager (Development Decisions)

020 7983 4895 email justin.carr@london.gov.uk

Tefera Tibebe, Case Officer

020 7983 4312 email tefera.tibebe@london.gov.uk

planning report PDU/2868/01

23 November 2011

Mayfield School, Pedley Road, Goodmayes

in the London Borough of Redbridge

planning application no.2086/11

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 proposal

Outline application: Erection of part two part three storey classroom building to accommodate four additional forms of entry, sports hall and four multipurpose games areas. New vehicular and pedestrian access from Mayfield Road and Kinfauns Road. (Emergency and delivery access only). Associated changes to car parking layouts.

The applicant

The applicant is **Children's Services London Borough of Redbridge**, and the architect is **Nightingale Associates**.

Strategic issues

Education, playing fields, climate change mitigation and adaptation, design, access, flood risk assessment and transport are the strategic issues relevant to this application.

Recommendation

That Redbridge Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 48 of this report; but that the possible remedies set out in paragraph 50 of this report could address these deficiencies. 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 October 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 1 December 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 3C of the Schedule to the Order 2008: “Development which is likely to prejudice the use of 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 Mayfield School as shown in Figure 1 occupies an area of 7.67 hectares. Along the northern boundary of the site lies a main line railway which runs into Liverpool Street Station. Residential development is located to the west of the school. A large grassed area owned by Goodmayes Primary School is positioned on the western boundary adjacent to the existing school car park. To the south and east lie further residential streets, with the school’s site directly abutting rear gardens of the houses facing onto Mayfield Road.



Figure 1: The application site – Source: applicant’s doc. planning statement

6 The school’s main entrance is from Pedley Road, an estate road serving residential cul-de-sacs mostly constructed from 1980’s onwards. The pupils’ entrance is further to the west directly into the main building from a landscaped court. Car parking is distributed across the site; visitors’ parking is to the east of the entrance and the main staff car park is to the south. There is also some informal car parking along the western boundary. The school currently has 76 car parking spaces for staff.

7 The site is surrounded by residential developments apart from the northern side which is defined by the Great Eastern Railway line. The nearest section of the Strategic Road Network lies approximately 360m to the north on the A118 High Road, and the nearest section of the Transport for London Road Network is approximately 3km to the north on the A12. Four bus routes (128,

150, 364, 368) serve the site with stops located between 260m and 480m away. The School is located between Goodmayes National Rail Station (690m to the west) and Chadwell Heath National Rail Station (640m to the east) providing mainline links to London Liverpool Street and Essex. As a result, the public transport accessibility level varies across the site between 2 (poor) and 3 (good), (out of a maximum of 1-6, where 6 is excellent).

Details of the proposal

8 The proposal for this outline planning application is to erect a three-storey stand alone new building to the north west of the existing school on the playing fields to accommodate four additional forms of entry, sports hall and four multipurpose games areas. New vehicular and pedestrian access from Mayfield Road and Kinfauns Road. (Emergency and delivery access only). Associated changes to car parking layouts.

9 Redbridge Council is proposing to increase the student population of the school from 1,460 student places to 2,300. In order to accommodate the extra intake of students the existing floor area of 7,266 sqm will be increased to 15,436 sqm; which is an increase of 8,170 sqm.

10 The school expansion will be accommodated within the existing Mayfield School site boundary, which falls under the D1 land classification, therefore the proposal does not result in a change of use. It is anticipated that the school will cater, after expansion, for an additional 840 pupils and require approximately 80 extra teachers and staff.

Case history

11 There is no relevant planning history related to the current proposal.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- Education *London Plan; Ministerial statement July 2010*
- 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 *London Plan; the Mayor's Transport Strategy; PPG13; Land for Transport Functions SPG*
- Parking *London Plan; the Mayor's Transport Strategy; PPG13*

13 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 Redbridge Core Strategy and the Borough Wide Primary Policies Development Plan Documents (adopted in 2008) and the 2011 London Plan.

Principle of use – education

14 In relation to the provision of educational facilities, policy 3.18 'Education facilities' of the London Plan states that *“Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes”*.



Figure 2: the existing school buildings (Source: applicant's planning statement)

15 The principle of the use, which is education, has been established on the site for a long time and the need for expansion is demonstrated in the planning statement. In addition the National Planning Policy Framework 'Planning for schools development' states that 'there should be a presumption in favour of the development of state-funded schools'. It is acknowledged there is a need for additional school places in Redbridge. Therefore, the extension of the School for education is supported.

16 However, as the proposal results the loss of playing fields the proposal does not comply with 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. That said, it is noted that the applicant has submitted an alternative site selection report and this confirms that this site is the only option (as the other suitable site Beal High School has already been considered for additional places for 2013 and the application for expansion of the school has been approved on 25 August 2011).

17 Sport England in its letter sent to Redbridge Council on 1 November states that there appears to be little, if any, 'net gain' for sport from these proposals. The school's existing gymnasium is to be demolished to create a vacant space. A new four court sports hall is proposed on the playing field. The other sports facilities are a single MUGA (described as an all weather pitch) and a four court MUGA, again located on the playing field. Extensive new school buildings are also proposed to be located on the playing field. All this new development is to be surrounded by what appears to be a 6m wide access road, the purpose of which has not been explained, but it further reduces the remaining area of the playing fields. It reiterates that the proposed scheme encroaches on or results in the loss of over a quarter of the playing fields (i.e. 1.02ha of the 5.18ha of the playing fields, on top of the 0.35ha of the playing field that was lost in 2008 to an extended building and an access road on which Sport England was not consulted).

18 In its conclusion, whilst it recognises the need to provide additional educational accommodation, Sport England stated that on the basis of information currently available it is unable to support these proposals and therefore considers it necessary to lodge an objection to the outline application.

19 Furthermore, the proposal 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.

20 In summary, design changes should be made to minimise the loss of playing fields and the applicant needs to make the case that the loss of playing fields is more than balanced by the improved sports facilities that will be provided and the ability for the local community to access these sports facilities. Future discussions with the GLA and Sport England officers are needed on the quantum and quality of the sports provision proposed.

Urban design

21 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan policy 7.1 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 and World Heritage Sites, views, the public realm and the Blue Ribbon Network. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (policy 7.4).

22 It is noted that design issues have been embedded in the outline planning application statement. A site plan, ground floor plan and elevation drawings, have also been provided. Whilst this is an outline application further information in respect of proposed design is required in order to make a full assessment of the scheme impacts on its surroundings and the playing fields and that the scheme complies with design policies of the London Plan.

Inclusive design

23 London Plan policy 7.2 'An Inclusive Environment' seeks the highest standards of accessibility and inclusion in new developments. London Plan policy 7.1 also stresses the importance of extending these inclusive design principles to the neighbourhood level by meeting Lifetime Neighbourhoods criteria. This can help to ensure that the public realm, parking areas, routes to the site and links to adjacent public transport and local services and facilities are accessible, safe and convenient for everyone, particularly disabled and older people.

24 The planning statement states that disabled people will access the new school buildings through a level entrance and that there are no steps within the proposed new school buildings and all floors between zones are level. The corridors will be wide enough to accommodate wheelchair users. The statement concludes that the new building additions will comply with the requirements of the Equality Act.

25 However, further information is required on design issues including the car parking provision; therefore it is not possible to assess whether the scheme meets the requirements of inclusive design and whether or not the quantum and location of blue badge holder parking spaces is acceptable. Discussions will be required to determine how this can be resolved within the scope of the outline application. Management arrangements for blue badge spaces should also be considered.

26 It is essential that the design of the school is fully accessible in order to ensure that disabled children and those with special educational needs can fully participate in school activities. The access statement should address the specific access requirements associated with the school. A

set of inclusive design principles specific to the detailed design of the school should be proposed and secured as part of the outline permission. In doing so the applicant is required to consult Building Bulletin 102: 'Designing for Disabled Children and Children with Special Educational Needs'.

27 Detailed drawings and layouts should be submitted that demonstrate the incorporation of inclusive design. These requirements should be met before the application can be considered compliant with London Plan policies 7.1 and 7.2.

Sustainable development

28 London Plan policies 5.2, 5.6 and 5.7 focus on mitigation of climate change and require a reduction in a development's carbon dioxide emissions through the use of passive design, energy efficiency and renewable energy measures. The London Plan requires developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures and prioritising decentralised energy, including renewables.

Climate change mitigation

29 The information submitted is insufficient. The applicant should submit a full energy strategy which addresses the Mayor's energy hierarchy in line with the GLA energy guidance. As it stands, the scheme does not comply with energy policies of the London Plan.

Climate change adaptation

30 London Plan policy 5.3 *Sustainable Design and Construction* seeks to ensure future developments meet the highest standards of sustainable design and construction. Specific policies relate to overheating (5.9), green roofs (5.11), urban greening (5.10), flood risk (5.12) and sustainable drainage (5.13), water (5.14 and 5.15) and waste (5.17). Further guidance is provided in the London Plan Sustainable Design and Construction SPG.

31 A flood risk assessment (FRA) has been undertaken by MLM Consulting Ltd and it took account of Planning Policy Statement 25 (PPS25) "Development and Flood Risk". The site is shown to lie in Flood Zone 1 on the Environment Agency (EA) mapping, not considered to be at significant risk of inundation from a main river or other significantly sized watercourse. The site is also not considered to be at significant risk of flooding from other, more minor, sources of flooding.

32 The FRA states that the development proposals do not include any notable areas of soft landscaping within the site boundary. The required surface water attenuation must therefore be provided within underground facilities. Currently it is proposed to provide two separate surface water attenuation facilities (one for each sub catchment). The attenuation for the main school building will be provided beneath the proposed triangular hard play area to the west of the site. The attenuation for the car park will be provided beneath the car park itself. The surface water runoff will be discharged (directly and indirectly) to the Mayes Brook, a culverted watercourse. That said, the applicant needs to be engaged with and should seek approval from Thames Water.

33 It is stated that green roofing has been considered and ruled out by the project design team on grounds of cost and maintenance requirements. However, the applicant should reconsider the provision of green roofing.

34 The FRA states that all drainage proposals are subject to detailed design and the approval of relevant parties. However, the Council is required to impose appropriate conditions that the

proposal accords with the London Plan policy 5.3 Sustainable Design and Construction and ensure that the development meets the highest standards of sustainable design and construction.

Transport for London's comments

Trip Generation & Highway Impact

35 The transport assessment states that the expansion of the school would result in an additional 229 two way vehicular trips being generated by the additional pupils and staff. TfL is therefore satisfied that the proposed development is unlikely to constrain capacity of either the Transport for London Road Network or Strategic Road Network.

36 Notwithstanding this, increased vehicular activity in connection with peak hour school trips may result in some localised congestion adjacent to the school. As local highway authority, Redbridge Council may need to ensure that this increased traffic is managed appropriately, and should ensure that the proposed pick-up / set-down facilities are capable of coping with predicted demand.

Car Parking and Travel Demand

37 Details of the existing level of car parking at the school have not been provided as part of the transport assessment. Whilst there are no specific standards in the London Plan for this use, TfL would however welcome further information on this matter to assess the acceptability of the proposed increase of 105 spaces while ensuring that sustainable methods of travel to/from the site are being adequately supported. As stated above, information regarding the quantum and location of blue badge holder bays is also requested. The existing school travel plan should be updated in this respect.

Walking and Cycling

38 TfL requests that a (Pedestrian Environment Review System) PERS audit be undertaken for those routes connecting the school with local amenities and public transport infrastructure in the vicinity. This should consider particularly the adequacy of the existing pedestrian crossing facilities close to the site, given that nearly 75% of the pupils are expected to travel to school by foot or by public transport. Further discussion with TfL on the scope of the assessment would be welcomed. This should specifically include routes to Chadwell Heath station given Redbridge and Barking & Dagenham Councils joint-working effort to improve connections the station and district centre. In line with London Plan Policy 6.10, any areas identified as being in need of improvement as a result of the audit should subsequently be secured through the section 106 agreement.

39 The proposed level of cycle parking for staff and pupils is considered acceptable and the applicant's commitment to provide shower and changing facilities to encourage staff / visitor cycle to / from the development is welcomed, in line with London Plan Policy 6.9. TfL would however recommend that the proposed cycle parking is monitored through the school travel plan and increased in line with demand, when necessary.

Travel Planning

40 It is noted that there is an existing school travel plan in operation although TfL expects this to be updated considering the proposed increase in staff and pupils. Given the site's acceptable public transport accessibility, specific measures should be provided to promote further the use of walking / cycling and public transport instead of private cars. An updated school travel plan should be secured by condition, in line with London Plan Policy 6.3.

Servicing & Construction Impact

41 It is recommended that a delivery & servicing plan (DSP) should be included to rationalise servicing vehicle movements to / from the site to assist in minimising highway and traffic impact to the TLRN in the vicinity of the site, particularly at peak hours. A construction logistics plan (CLP) is also required, which should seek to minimise highway and traffic impact to the highway network during the course of construction. These plans should be agreed by Redbridge Council. The CLP should include booking systems, consolidated or re-timed trips, secure, off-street loading and drop-off facilities and using operators committed to best practice, demonstrated by membership of TfL's Freight Operator Recognition Scheme (FORS), or similar. Both the DSP and CLP should be secured by condition, in line with London Plan Policy 6.3.

Olympic Games 2012

42 The Olympic Route Network (ORN) and Paralympic Route Network (PRN) will operate during the Olympic and Paralympic Games period between June and September 2012. During this period, there will be an impact on construction works, utility works and highway licensed activities (for example, skips and building materials) if they affect the roads designated as a part of the ORN/PRN and some of the surrounding streets. Other routes might also be affected and will also be required to be clear of any kinds of obstruction. These are not yet finalised, but will be advised as further information becomes available.

43 Given the above, highway works and licences could therefore be affected on occasions during the Games period. Requests to utility providers to provide any additional water, gas, electricity or telecommunications connections should also be made sufficiently well in advance of this period. This note is for information only and is provided without prejudice to the legal rights of the ODA or any other relevant authority whether under the London Olympic Games and Paralympic Games Act 2006, planning, traffic or highway legislation or otherwise. Further information and the latest news on the ORN and PRN can be found on the London 2012 website at <http://www.london2012.com/olympic-route-network/home.html>.

Summary

44 Overall, TfL has no significant objections to the principle of the proposed development. TfL however considers that further work is required by the applicant for the proposals to comply with the transport policies of the London Plan as stated above.

Local planning authority's position

45 Redbridge Council officers have yet to confirm their position.

Legal considerations

46 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

47 There are no financial considerations at this stage.

Conclusion

48 London Plan policies on education, playing fields, climate change mitigation and adaptation, design, access, and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Education:** The principle of use which is education has been established on the site for a long time and the need for expansion is demonstrated.
- **Playing fields:** The proposed scheme is not acceptable and contrary to the London Plan in terms of the loss of playing fields. The applicant should minimise the loss of playing fields and take further measures to improve the quality of sports provision.
- **Climate change mitigation and adaptation:** The information submitted is insufficient. The applicant should submit a full energy strategy which addresses the Mayor's energy hierarchy in line with the GLA energy guidance. The scheme does not comply with energy policies of the London Plan. The mitigation measures proposed for flood risk management are acceptable provided Thames Water support them and they should be secured through conditions. The provision of green roofing must be reconsidered.
- **Design:** Further information should be provided.
- **Access:** Detailed drawings and layouts should be submitted that demonstrate the incorporation of inclusive design.
- **Transport:** Further work is required on car parking and travel demand, walking and cycling, and travel plans, for the development to comply with the transport policies of the London Plan as stated above

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

50 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Playing fields:** Loss of playing fields should be minimised and further justifications and measures required for the improvement of the quality of sports provision.
- **Climate change mitigation and adaptation:** submit a full energy strategy which addresses the Mayor's energy hierarchy in line with the GLA energy guidance. Agree to conditions that secure the proposed mitigation measures. Engage with Thames Water. Reconsider the provision of green roofing.
- **Design:** provide further information.
- **Access:** provide detailed drawings and layouts that demonstrate the incorporation of inclusive design.
- **Transport:** Address concerns in relation to car parking and travel demand, walking and cycling, and travel plans.

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020 7983 4783 email colin.wilson@london.gov.uk

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