

# Copthall School, Pursley Road

in the London Borough of Barnet

planning application no. H/01012/13

## 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

Removal of two temporary buildings from existing hard play area and the erection of new two-storey teaching block. Proposed temporary classroom and contractor's compound for the duration of works.

## The applicant

The applicant is **Barnet Council**, and the architect is **Pick Everard Integrated Team**.

## Strategic issues

The proposal is not **inappropriate** development on **Green Belt**. Other issues that needed to be assessed include **education, playing fields, biodiversity, access and design, energy, flood risk and transport**.

## Recommendation

That Barnet Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 55 of this report; but that the possible remedies set out in this paragraph of the report could address these deficiencies. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

## Context

1 On 15 April 2013, the Mayor of London received documents from Barnet 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 24 May 2013 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 of the Order 2008: "Development – (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and

(b) which would involve the construction of a building with a floor space of more than 1000 square metres or a material change in the use of such building”.

3 Once Barnet 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 the 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](http://www.london.gov.uk).

## Site description

5 Copthall School which has an area of 4.2Ha is located within Green Belt close to the junction of Pursley Road and Page Street. The boundary of the site is lined with mature trees adjacent to residential properties.



*Aerial view of existing school site, outlined in red – Source: applicant’s design and access statement*

6 The main entrance to the school site is located to the south of the site on Pursley Road. This comprises controlled pedestrian and vehicular gates which lead to foot paths and an access road. The pedestrian gate takes pupils past the Sports Hall, which fronts Pursley Road, and on to the entrance in the main school building and which is signposted by a prominent architectural feature. Parking is provided along the road, and in two small car-parks to the side.



*The existing school viewed from Pursley Road entrance – Source: applicant’s design and access statement*

7 The nearest part of the Transport for Road Network (TLRN) is the A1; Watford Way which is approximately 665m to south. M1, A1 & A41 are also very close west of the site. The nearest Strategic Road Network (SRN) is the A5, Edgware Road, which is approximately 2.5km east of the site. The site is served by bus route 221, which runs between Edgware and Turnpike Lane via Wood Green with bus stops on Pursley Road within 100m of the site. Mill Hill East station is located approximately 1.6km east of the site and provides services on the Northern line to Central London destinations via Finchley Central and Camden Town. The nearest national rail station is Mill Hill Broadway, approximately 1.3km north west of the site, and is served by regular First Capital Connect Thameslink services between central London/south London to the south, and Luton and Bedford to the north.

8 The site records a public transport accessibility level (PTAL) of 1, (out of a range of 1 to 6, where 6 is the highest and 1 the lowest).

## Details of the proposal

9 The development incorporates the following proposals:

- Removal of two demountable buildings.
- Installation of three temporary demountable classrooms.
- Construction of a new teaching block of 1,150 sq.
- Relocation of access driveway to remaining hard-play areas.
- Removal and replacement of planting.
- Relocation of disabled parking bays to a position in front of the main school entrance.

## Case history

10 No relevant planning history in regard to the school extension.

## Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Education *London Plan*
- Green Belt *London Plan*
- Playing fields *London Plan*
- Biodiversity/Geodiversity *London Plan; the Mayor's Biodiversity Strategy; draft Tree and Woodland Strategies; London's Foundations (Geodiversity) SPG*
- Design *London Plan*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Flooding *London Plan*
- Transport *London Plan; the Mayor's Transport Strategy*

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2012 Barnet Core Strategy Development Plan Document and the 2011 London Plan.

13 The following are also relevant material considerations:

- Barnet Development Management Policies, Development Plan Document (2012)
- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework
- The draft Revised Early Minor Alteration to the London Plan.

## **Education use, Green Belt and playing fields**

### **Education use**

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”*.

15 The above policy states that *“the Mayor will support provision of early years, primary and secondary school and further education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice, particularly in parts of London with poor educational performance. ...Development proposals which enhance education provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes. Those which address the current projected shortage of primary school places will be particularly encouraged. ...Proposals for new schools should be given positive consideration.”* The supporting text for this policy projects the younger population is set to increase by 17%, thus generating a requirement for the further supply and diversity of schools. Local authorities are encouraged to support the development of Academies and Free Schools.

16 Para 72 of the NPPF states *‘The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement and to development that will widen the choice of education. They should give great weight to the need to create, expand or alter schools.’*

17 Copthall School is a state-funded, multi-ethnic girls’ school which currently has 1,129 pupils aged 11-19. It is planned to increase the school role to 1,331 and as a result, Barnet Council is seeking planning permission to construct a two storey extension to the school, as part of Barnet Council’s agreed strategy. The school extension will be located on part of an existing area of hard-play and will connect directly to the existing school. The applicant has demonstrated that there is a high demand for such school places and the education need as a special case.

18 There is a significant London-wide shortage of school places, which has occurred for a number of well documented reasons. This pressing need, which has been evidenced by the Council at a local level needs to be considered in the context of the Government’s and Mayor’s strong support for new education provision as set out in the NPPF and London Plan respectively.

### **Green Belt**

19 The National Planning Policy Framework (paragraph 67) and the London Plan (policy 7.16) set out that only development associated with agriculture, forestry, outdoor sport and recreation is appropriate in the Green Belt. All other forms of development are, by definition, ‘inappropriate’. In order for ‘inappropriate’ development to be acceptable in the Green Belt, very special circumstances must apply.

20 The NPPF sets out that *new* buildings are inappropriate in the Green Belt although some exceptions to this are set out including limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.



*The proposed development – view from north east – Source: applicant’s design and access statement*

21 Although the application site is entirely located within the Green Belt, the proposed teaching block will be located on the hard standing area and can be considered as limited infilling. The proposal will have a floorspace of 1,150 sq. m (divided between the two floors), and embedded into the existing built complex and not any taller (as shown in the figures). Therefore, the proposal will not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Therefore, the proposal is not inappropriate development and the applicant does not need to demonstrate very special circumstances. The development is acceptable.



*View of hard play area – the proposed site: Source-applicant’s design and access statement*

## **Playing fields**

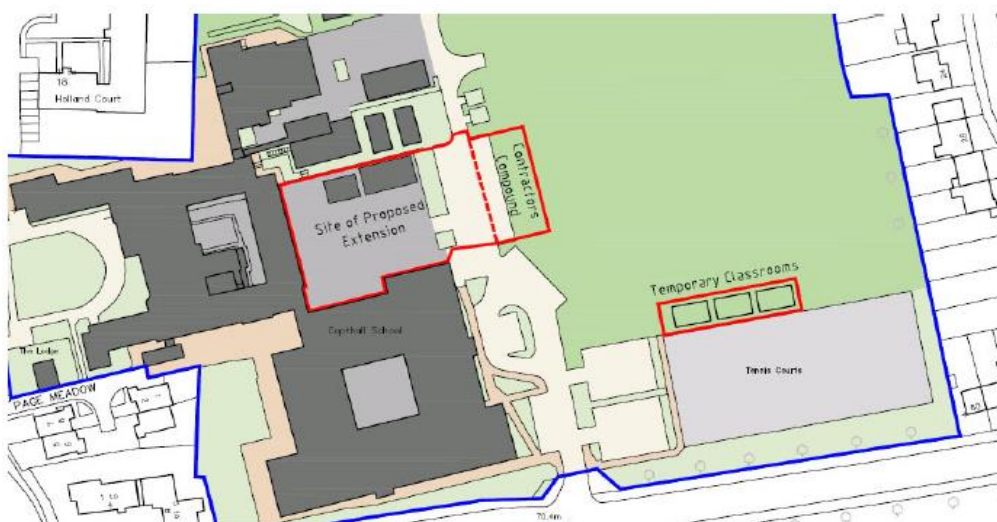
22 The application site as shown below is part of an existing hard play area which is rectangular in shape, measuring approximately 41m deep x 31m wide across the extremities at the point where

development is to take place; however this widens to approximately 36m at the western end, which is to be retained as open space.



*Aerial view of existing hard play area, outlined in red – Source: applicant’s design and access statement*

23 The application involves siting part of a construction compound and three temporary classrooms on the playing fields (as shown below). However, it is noted from the applicant’s Copthall Green Belt Reinstatement Plan that both the construction compound and the temporary classrooms will be removed and the playing fields will be reinstated on completion of construction works. Therefore, there are no major concerns in this regard.



*Location of contractor’s compound and temporary classrooms: Source: applicant’s design and access statement*

- 24 Sport England took a pragmatic approach to the proposed development and noted that:
- The compound and mobile classrooms will only be in situation during the construction works.
  - The compound and mobile classroom will be removed and the playing field made good, following the completion of the building works.
  - The compound and mobile classrooms are situated on the boundary of the playing field and therefore the majority of the playing field will be left clear for pitches to be marked out on.

25 Sport England has confirmed that it has no objection to the proposed development, provided that the reinstatement plan is conditioned.

## **Biodiversity**

26 The applicant has submitted a preliminary ecological assessment. There are no strategic nature conservation or green infrastructure issues relating to this application.

## **Urban design**

27 There are no strategic design concerns as the development is on existing hard standing, embedded into the existing build form and not any taller.

## **Access**

28 The design and access statement states that the design has been developed to give level access throughout the new building. Generally areas will be designed to meet the latest Building Regulations - Part 'M', the DDA/SEND Acts & BS 8300. The statement states that the design specifically addresses the following issues:

- Level or ramped access from all approach routes.
- All appropriate doors are wheelchair accessible.
- Doors to be fitted with a door closer of a type that requires a maximum opening force of 30N at the leading edge.
- Doors will contain vision panels which provide visibility from 500mm to 1500mm above the floor levels.
- Signage will be planned and designed to current best practice with reference to the UEA standard and the Sign Design Guide (2000) and DRC (2004) 'Good Signs'.
- Lighting and colour and finishes schemes will follow 'best practice' with particular reference to the needs to those with visual impairment.

29 Addressing the above issues in the context of inclusive design is welcomed and supported. However, these proposals should be identified in the drawings verifying their compliance with measurement. The provisions should be secured by conditions.

30 The statement states that all facilities provided within the new teaching block will be accessible to students, staff and visitors of all abilities. New toilets facilities are provided on the ground floor together with addition separate unisex accessible WC's on both the ground and first floors. These will be of a size and fitted out to enable their use by wheelchair users. Whilst these provisions are welcomed, they should be be secured by conditions. The provision of a new lift is welcomed for the proposed development, but clarification is required in regard to the distance of the proposed lift from the other lifts in the existing buildings.

31 The design and access statement states that the School currently has 94 parking spaces on site including two disabled persons spaces, adequately accommodating current staff levels. The relocation of these two disabled parking bays to a position in front of the main school entrance is an element of the planning proposals. Whilst the relocation is supported clarification is required whether these are to be used for visitors and where the drop-off will be located. The applicant is also required to consider increasing the number of disabled parking spaces at least to 5% of the overall spaces (i.e. additional three disabled parking spaces are required). These additional provisions should be secured by conditions.

## **Sustainable development**

32 It is unclear from the information provided, what level of regulated carbon savings will be achieved through energy efficiency alone compared to a 2010 Building Regulations compliant development.

33 A breakdown of regulated CO2 emissions and savings from energy efficiency alone should be provided expressed in tonnes per annum and in percentage terms. The applicant stated that the school's heating will be provided using gas boilers. Given the low density nature of the surrounding areas, the proposal is accepted as a district heating network is unlikely to come forward in these areas. The applicant has proposed to install 51 sq. m of roof mounted photovoltaic panels.

34 In summary, the applicant should provide a breakdown of the residual regulated CO2 emissions after each stage of the energy hierarchy and the regulated CO2 emission reductions at each stage of the energy hierarchy. This should be expressed in tonnes per annum and in percentage terms in line with Table 1 and 2 of the GLA energy assessment Guidance, September 2011.

## **Flood risk**

35 A flood risk assessment has not been undertaken as the development is within Flood Zone 1 and is less than 1 hectare. As such, the principle of the development is acceptable.

36 Surface Water Run-off: The Drainage Strategy indicates that the surface water will be discharged to an existing surface water connection with a 20% reduction by attenuation. This minimal aspect of reducing surface water discharge from the site is considered insufficient to meet the Mayor's minimum standard of a 50% reduction in run-off rates contained within the Sustainable Design and Construction SPG, referred to in the Sustainability Statement) and therefore the scheme fails to comply with the policy 5.13 of the London Plan. In particular the open space playing fields adjacent to the school should be designed to collect and absorb surface water and indeed could receive a high proportion of the residual surface water flow from the new school building and from the existing school buildings. As the school is near to the top of the local water catchment, it is an important and relatively easy opportunity to reduce the risk of flooding further downstream.

37 In summary, prior to any referral back to the Mayor, the applicant should re-examine the drainage aspect of the proposals and include measures to divert or attenuate a higher proportion of the surface water run-off.

## **Transport for London's comments**

38 Vehicular access to the school car park is currently via the main entrance on Pursley Road. There are also three pedestrian accesses to the site; the main access point, along with two accesses from Page Street to the west, but they are not in active use and therefore are usually closed. TfL welcomes the proposal to reopen the Page Street pedestrian access point for pupil access to minimise the potential conflict between vehicles and students on Pursley Road. It is also expected that this could relieve some of the school run parking pressure on Pursley Road.

39 As stated above, the school site currently provides 94 marked car parking spaces, including two disabled bays. There is also one space for a minibus. In addition, kerbside parking is also permitted within some areas of the site. The transport assessment predicts that existing parking would be sufficient to accommodate additional demand post completion of the development; therefore no additional parking space is proposed. TfL also welcomes that the disabled parking spaces will be relocated closer to the school reception area so that they are more accessible. In order to ensure that

parking levels are capped in line with the transport assessment, TfL recommends that Barnet Council to restrict parking to marked bays through school parking management plan.

40 As the existing parking will serve the enlarged school, Barnet Council is encouraged to secure the installation of electric vehicle charging points (EVCPs) to those spaces in line with London Plan policy 6.13 'parking'.

41 There are only 20 cycle parking spaces currently on site which may explain the very low cycle mode share (estimated at 1%) by pupils and staff at present. In order to encourage sustainable travel and minimise additional traffic on the local highway network, TfL considers that these proposals should promote further cycling. With an increase of 202 pupils and 30 staff at the enlarged school, at least 25 additional cycle parking spaces would be required in line with London Plan 6.9. However, in order to encourage pupils and staff to cycle to school, TfL urges the applicant to progressively increase cycle parking across the site with the aim of ultimately providing 153 spaces overall; the London Plan standard for the entire school population of 1,331 pupils and 196 staff. The applicant should therefore identify space within the school site for future provision. The monitoring of cycle use, demand for cycle parking facilities and the triggers for providing additional stands should also be included in an updated school travel plan.

42 TfL also requests that all cycle parking facilities be secured, covered and shower/changing facilities be provided on site to encourage staff/pupils cycling to/from the school. All of the above are to be in line with London Plan 6.9.

43 TfL welcomes that a pedestrian (or PERS) audit has been included in the transport assessment. Barnet Council is therefore encouraged to secure the necessary pedestrian improvements that have been identified through s106 agreement. This is to be in line with London plan policy 6.10.

44 The trip generation and modal share for these proposals have been based on the travel plan survey carried out for the school in January 2013. This is considered reasonable by TfL. It is estimated that the proposals would generate an extra 147 two-way vehicular trips during both the morning and evening peak periods. The assessment also estimated that up to 67 person bus trips would be generated.

45 Four junctions in the vicinity of the school were assessed; the mini roundabouts at Page Street/ Bunn Lane and Page Street/ Pursley Road, the existing school access with Pursley Road, and the A1 Watford Way/ Page Street signal controlled junction. The assessments reveal that the two mini roundabouts are already operating beyond their capacity and the additional vehicular trips resulting from the school will exacerbate that congestion. Since no highway mitigation measures have been identified with these proposals, TfL emphasises the need to minimise additional car trips, as stated above. Nonetheless it is expected that the A1 Watford Way (TLRN)/Page junction will operate within capacity, as traffic generated from the proposal will be distributed to all directions.

46 The transport assessment identifies need for additional capacity on bus route 221 within this part of Mill Hill. There is a need to address additional demand with the Council and a mechanism to ensure sufficient bus capacity. Barnet Council's initial response is that any additional funding is not within their budget and it would therefore adversely affect the viability of the project. TfL considers it necessary that the impact on this particular bus route is explored with a view to resolving mitigation of increased demand. It is important to ensure that there is sufficient capacity to accommodate additional demand for buses, otherwise it could shift travel demand onto the already congested road network. As such TfL welcomes ongoing discussion with Barnet Council in order to resolve this matter.

47 It is understood that an updated full school travel plan will be submitted for the enlarged school. The updated travel plan should be developed in line with TfL's guidance for Travel Planning, to comply with London Plan policy 6.3. The travel plan should therefore be secured by section 106

obligation. As stated above, given the lack of highway mitigation measure proposed; the travel plan should encourage pupils and staff to travel by non-car based modes of transport to ensure car trip generation will be kept to a minimum. To achieve this, school is encouraged to set ambitious walking and cycling mode share targets, as referred to above.

48 A construction logistic plan (CLP) should have been included with the transport assessment. However, TfL is content for this to be secured by planning condition. In particular it should address traffic management as well as staff and pupil safety during the construction period.

49 A delivery and servicing plan (DSP) was included in the transport assessment which is welcomed by TfL. While it is not anticipated that these proposals will generate a significant increase in servicing trips the plan should ensure that servicing would continue to operate smoothly during the construction period as on-site parking would be limited. The Council shall therefore secure the submission of an interim DSP for the construction period, prior to the construction period and a final updated DSP prior to the occupation of the new buildings by conditions in line with London Plan policy 6.14.

50 In accordance with London Plan policy 8.3 '*Community Infrastructure Levy*', the Mayor has agreed a CIL Charging Schedule which came into operation on 1 April 2012. It will be paid by most new development in Greater London. Boroughs are arranged into three charging bands with rates of £50 / £35 / £20 per square metre of net increase in floorspace respectively. As the proposed development is for a school as defined by the Education Acts, no CIL will be chargeable for this development.

51 In summary, the main issues raised above need to be resolved before the application can be considered in line with the transport policies set out within the London Plan (2011). These include:

- Secure the necessary pedestrian improvement identified in the PERs audit.
- Agree to a mechanism to ensure sufficient bus capacity arising from any significant additional demands.
- Confirm cycle parking, disabled parking provision and electric vehicle charging points for the site.
- Secure travel plan via appropriate conditions/obligations. The travel plan should set high targets for non-car based travel to reduce car trip generation.
- Secure of CLP/DSP via appropriate conditions/obligations.

## **Local planning authority's position**

52 Barnet Council planning officers have yet to confirm their position.

## **Legal considerations**

53 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

54 There are no financial considerations at this stage.

## Conclusion

55 London Plan policies on Green Belt, educational use, playing fields, biodiversity, design, access, energy, flood risk and transport are relevant to this application. The application complies with some of these policies but not with others and on balance does not comply with the London Plan, the reasons and the potential remedies to issues of non-compliance are set out below:

- **Green Belt & educational use:** The proposal will not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. The development is acceptable.
- **Playing fields:** There are no major strategic concerns. However, the delivery of the proposed Green Belt Reinstatement Plan should be conditioned.
- **Biodiversity:** There are no strategic concerns.
- **Design:** There are no strategic concerns.
- **Access:** The proposed measures should be identified in the drawings verified with measurements and secured by conditions. The applicant should clarify the location of the existing lifts and should also consider increasing disabled parking spaces.
- **Energy:** The applicant should provide a breakdown of the residual regulated CO2 emissions after each stage of the energy hierarchy and the regulated CO2 emission reductions at each stage of the energy hierarchy.
- **Flood risk:** The minimal aspect of reducing surface water discharge from the site is considered insufficient. The applicant should re-examine the drainage aspect of the proposals.
- **Transport:** The transport concerns which are summarised in the TfL section of this report should be addressed and where appropriate conditioned.

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