

28 January 2015

**Little Ilford School, Browning Road, Manor Park,
E12 6ET, London****in the London Borough of Newham****planning application no. 14/02740/FUL****Strategic planning application stage 1 referral**

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

The proposal

Redevelopment of existing school, including demolition of school buildings and construction of a new four storey school building, refurbishment and expansion of the existing sports hall, together with car and cycle parking facilities, servicing, access, fencing and landscaping treatments.

The applicant

The applicant is **Wates Construction**. The agent and architect is **CPMG Architects Limited**.

Strategic issues

The proposed school expansion is supported in principle. Outstanding strategic issues with regards to **urban design, energy** and **transport** should, nevertheless, be resolved before the application is referred back to the Mayor.

Recommendation

That Newham Council be advised that while the application is generally acceptable in strategic planning terms 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 the same paragraph 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 22 December 2014 the Mayor of London received documents from Newham 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 January 2015 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 3E of the Schedule to the Order 2008:

Category 3E

1. Development —

(a) which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and

(b) comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within class D1 (non-residential institutions) in the Use Classes Order.

3 Once Newham 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.

Site description

5 The application site has a total area of 2.8 hectares and is currently occupied by Little Ilford School that was constructed in the late 1950s and 1960s. Little Ilford School is an 11-16 years local authority maintained community secondary school that currently provides for 1,365 pupils (on roll), including 15 pupils within an Autistic Spectrum Disorder (ASD) unit. It is surrounded on all sides by residential streets and bounded to the south by Rectory Road, to the west by Browning Road and to the north by Church Road. The eastern boundaries of the site are immediately adjacent to residential back gardens.

6 The main buildings on the application site are concentrated to the western side of the site and are supplemented by various ad-hoc infill and temporary buildings which are generally considered to be at the end of their economic life. All of the buildings vary in height from one to three storeys. The total floorspace of the buildings is approximately 10,200 sq.m. The remainder of the site is mostly hard surface play ground with a rectangular area of grass fronting Rectory Road.

7 Newham's Core Strategy Proposals Map identifies the site as Green Space and as forming part of a wider Archaeological Priority Area.

8 The application site has a public transport accessibility level (PTAL) of 1b which is considered poor. The 147 is the only bus route within walking distance of the site. Other bus routes run within close proximity. East Ham and Woodgrange Park are the closest (London Overground and National Rail) station.

Details of the proposal

9 The proposed development seeks to:

- demolish the majority of the existing buildings
- construct a new, central L-shaped teaching block (predominantly four storeys in height, with peripheral elements of one to two storeys in height) on the location of the current hard play and grass amenity space in the south-eastern part of the site
- expand the ASD unit to be integrated into part of the ground floor of the proposed teaching block
- refurbish and extend the existing five-court sports hall with additional physical education accommodation, including changing rooms

- provide various hard and soft play areas, including a new grass pitch, a large Multi Use Games Area (MUGA) and associated other hard play areas.

10 The existing operations of the school will be maintained during the build period. It is expected that the proposals will deliver a school with a total capacity of 1,525 pupils and 238 staff (this is an increase of 160 pupils).

Case history

11 The case has no strategic planning history.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- Education *London Plan; Draft Social Infrastructure SPG*
- Green space *London Plan;*
- Urban design *London Plan; Accessible London: Achieving an Inclusive Environment SPG and Character and Context SPG*
- Sustainable development *London Plan; Sustainable Design and Construction SPG*
- Transport and parking *London Plan; the Mayor's Transport Strategy.*

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Newham Council's Core Strategy Development Plan Document (2012), Newham Saved Unitary Development Plan Policies (2012), Newham Local Plan Proposals Map (2012), and the 2011 London Plan (with 2013 Alterations).

14 The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Policy Guidance;
- The draft Further Alterations to the London Plan - 'intend to publish' version as submitted to the Secretary of State (December 2014).

Principle of development - Education facility on open space

15 London Plan Policy 3.18 supports developments which enhance education and skills provision, including new build, expansion of existing or change of use to educational purposes. Whereas, London Plan Policy 7.18 resists the loss of protected open spaces unless equivalent or better quality provision is made.

16 The site is not on Metropolitan Open Land or on the Green Belt but is locally designated as Green Space in Newham's Proposals Map. Policy INF6 of the Core Strategy protects green spaces and encourages improvements to the quality and accessibility of existing open spaces.

17 By proposing to reconfigure the buildings on the site, the applicant proposes to improve and extend the education provision on-site and to increase the amount and quality of the open space.

18 The need to replace the school is strongly supported and it is accepted that to maintain education provision on-site it is necessary to build on the existing open space. However, once complete new and increased open space will be provided on the western part of the site, this will have an increased amenity value.

19 Given the increased demand for school spaces across London and the education benefits the proposal will bring in the borough, the proposal is acceptable.

Urban design

20 Overall, the simple layout approach to the site and the introduction of well-defined school play facilities is welcomed. However, the following opportunities to improve the public facing edges of the site and proposed buildings should be considered:

21 The applicant should ensure that consideration is given to the boundary treatment along the western site boundary. This should be designed to provide a secure environment to the school but also allow for transparency into the site, to avoid large expanses of blank, inactive frontage.

22 While the location of the car park is retained, further detail would be welcomed on how this corner of the site can present defined edges to the street to enhance the spatial quality of the streetscape along Rectory Road.

23 The opening up of the southern edge of the site is welcomed, as this provides a welcoming and legible principal point of entry into the school campus. Opportunities for optimising the amount of active frontage to all public facing edges of the blocks should be explored, with particular emphasis placed on the provision of well-defined, public facing community based uses.

24 The simple architectural response to the site is welcomed. The applicant is however encouraged to give careful consideration to the proportions and depth of window reveals to ensure the highest quality appearance is achieved. The Council should secure key details through conditions, including window reveal depths and curtain walling elements to ensure a high quality of design is built.

25 The applicant should ensure that the design considerations for inclusive schools set out in the Mayor's Accessible London: Achieving an Inclusive Environment SPG (2014) have been taken into account.

Climate change adaptation

26 The applicant has submitted a sustainability report carried out in accordance with GLA guidance. The site is in flood zone 1 and the proposal includes a number of measures in response to strategic policies regarding climate change adaptation, which are welcomed. Measures proposed include the introduction of infiltration, conveyance and storage SUDS to manage surface water run-off, water efficient fixtures and fittings to reduce water consumption, in addition to the carbon reduction measures detailed below. These measures should be secured by condition, where appropriate. Opportunities for green roofs should also be considered in line with Policy 5.11.

Climate change mitigation - energy

27 The carbon emissions and savings at each step of the energy hierarchy have been presented against a Part L 2010 baseline. As the application was submitted after the 5th of July 2014 the emissions and savings should be presented under Part L 2013 in line with latest guidance that can be found here:

http://www.london.gov.uk/sites/default/files/GLA%20guidance%20on%20preparing%20energy%20assessments%20April%202014%20final_2.pdf

Energy efficiency standards

28 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include mechanical ventilation with heat recovery and low energy lighting and efficient controls. Evidence should be provided on how the demand for cooling will be minimised in compliance with Policy 5.9.

29 The development is estimated to achieve a reduction of 15 tonnes per annum (10%) in regulated CO₂ emissions compared to a 2010 Building Regulations compliant development. The applicant should reassess the building using Part L 2013, and if necessary model additional energy efficiency measures and commit to the development exceeding 2013 Building Regulations compliance through energy efficiency alone. The BRUKL sheet for the building including efficiency measures alone should be provided to support any savings claimed.

30 The applicant should clarify whether the refurbishment of the sports hall has been included as part of the assessment. While it is accepted that opportunities for reducing the carbon emissions associated with the existing building will be limited, the applicant should demonstrate that the refurbishment has been carried out in line with the energy hierarchy and that carbon savings have been targeted where reasonable. The carbon emissions associated with this element of development and any targeted savings should be quantified.

District heating

31 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant should, however, provide a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available. The applicant should explain how this will be achieved by providing details on the building heating system type proposed, the location of the plant room and the space allocation for future heat exchangers and district heating connection.

Combined Heat and Power

32 The applicant has investigated the feasibility of CHP. However, due the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

Renewable energy technologies

33 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 100 sq.m. of solar PV. A roof plan showing the proposed installation should be provided.

34 The carbon savings associated with this element of the energy hierarchy should be calculated using Part L 2013 methodology and emission factors.

Summary

35 A reduction of 35 tonnes of CO₂ per year in regulated emissions compared to a 2010 Building Regulations compliant development is expected, equivalent to an overall saving of 24%.

36 The applicant should reassess the development under Part L 2013, address the comments above and consider the scope for additional measures aimed at achieving further carbon reductions.

37 Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.

Transport

Cycle parking

38 TfL expects that cycle parking will accord with London Plan (2011) standards and Revised Early Minor Alterations (REMA 2013) to the London Plan. The 80 cycle parking spaces proposed in the application fall short of London Plan standards.

Car parking

39 It is noted that 68 on-site car parks are proposed (including four disabled parks). A further two disabled car parks will be provided on street which is welcomed by TfL. TfL is concerned with the level of uncontrolled parking on surrounding streets. TfL would encourage the Council to introduce Controlled Parking Zone restrictions to prevent over spill parking from the school, particularly staff (except for disabled parking). TfL would expect that a portion of the onsite parking should be allocated to visitors to the school. TfL would also expect that the car parking accords with London Plan standards (2011) for electric vehicle charging points.

40 TfL is concerned in terms of how the drop off and collection of school children, on street, will be appropriately managed. TfL considers that an appropriate drop off arrangement could be devised on site and would include the removal of car parking. It is anticipated that Council will also adopt a view on this arrangement.

Public transport network

41 The site has a low PTAL (1b) and is currently served by one bus route (147). There are currently two bus stops serving this route, these are located along Church Road and Browning Road. TfL officers have confirmed that there would be no adverse implications upon public transport as a result of the proposals.

Travel planning

42 A robust travel plan for the school, should be required, to be agreed by the Council prior to first occupation. The travel plan should be secured, enforced, monitored and reviewed as part of the S106 agreement. Staff, children, and their parents, should be encouraged to either walk, cycle or take public transport to school, with stretching mode share targets set in the travel plan. These measures should be funded through the S106 agreement.

43 TfL would also expect a delivery and service plan and a construction logistics plan to be secured as part of the S106 agreement.

Local planning authority's position

44 It is understood that the applicant has had pre-application meetings with officers at Newham Council. The Council's officers are supportive of the principle of the development and the relocation of the built form on site. The design and layout of the development has

progressed through the Council’s Design Review process and officers consider that the proposals have improved to a point which is now acceptable.

Legal considerations

45 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, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application.

46 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 the principle of development, urban design, climate change and transport are relevant to this application. Whilst the application is supported in principle, there are outstanding strategic planning issues. Further discussion is therefore required regarding the following issues:

- **Principle of development:** The principle of a school expansion is supported in strategic terms. The re-provision of open space on-site is also acceptable.
- **Urban design:** The simple layout approach to the site and the introduction of well-defined school play facilities is supported in strategic terms. Opportunities for improving the public facing edges of the site and proposed buildings should be considered.
- **Energy:** The detailed matters set above should be fully addressed. The proposed scheme should be assessed against Building Regulations Part L 2013.
- **Transport:** The outstanding matters set out by Transport for London above need to be resolved in order to demonstrate full compliance with relevant London Plan policies.

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