Eltham Hill Technology College
in the London Borough of Greenwich
planning application no.08/1191/F

Strategic planning application stage 1 referral (new powers)


The proposal

Erection of a temporary three-storey building to provide classroom accommodation.

The applicant

The applicant is London Borough of Greenwich, and the architects are Hawkins Browns Architects.

Strategic issues

The proposal is acceptable in terms of metropolitan open land policy. The urban design and access statement need clarifying. The energy strategy is acceptable due to the nature of the application (temporary structure). The scheme will not have adverse impact on strategic transport network. Safety measures for pedestrians and cyclists need to be implemented. Employment and training strategy is required.

Recommendation: That Greenwich Council be advised that the application does not fully comply with the London Plan, for the reasons set out in paragraph 53 of this report; but that the possible remedies set out in paragraph 55 of this report could address these deficiencies.

Context

1. On 2 June 2008 the Mayor of London received documents from Greenwich Council notifying him of a planning application, received on 11 April 2008, 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 11 July 2008 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: “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 Greenwich 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; take it over for his own determination; or allow the Council to determine it itself.

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 Eltham Hill Technology College is located on the south side of Eltham Hill just to the west of the town centre. The College occupies a 2.1-hectare site at the top of Eltham Hill at the point where it joins Eltham High Street. Eltham rail station is located within 10 minutes walking distance from the site and offers regular services to Central London and Kent. The site is also well served by bus, with over 10 routes operating along the nearby A210, Eltham High Street, although only four of these routes are considered to be within an acceptable walking distance of the site. As a result of this, it is estimated that the site records an average public transport accessibility level of 3. This should, however, be further confirmed by the applicant providing the necessary calculations as part of the transport assessment report. The school is close to Eltham Palace and is built on land originally making up part of the Palace Estate.

Fig 1.1 Ordinance survey showing land uses in proximity to the site (Source: applicant’s design and access statement)

6 The plan diagram Figure 1.1 shown above highlights the key land uses in and around the application site. The site lies within a predominantly residential area. The site immediately to the east is a bingo hall and is a potential future development site. Further east, Eltham High Street
comprises a mix of small office and retail uses. Although the whole of the school site is in educational use, the western part of the site comprises hard tennis courts and playing fields and is designated as Metropolitan Open Land (MOL). Queenscroft Park to the south and west is also designated as Metropolitan Open Land and has existed since the early 1930s.

**Details of the proposal**

7. The proposed temporary classrooms are to be positioned within the school grounds on the playing fields located to the south of the existing netball and tennis courts. A sports hall, dining room, 40 classrooms and ancillary facilities are proposed, within blocks that will be three storeys high with a total floor area of 4,988 sq.m.

8. Installation of the classrooms is programmed to commence in July 2008, to allow phased construction of a new school on the site of the existing buildings, with removal completed towards the end of the final phase of construction of the new school, between February and June 2010. On this basis, this application seeks permission for the use of the temporary accommodation at the school for a period of no more than two years in total.

**Case history**

9. Until the early 1900s the site was occupied by a farmhouse as part of the Eltham Palace Estate. Although the school was established in 1906, it did not move to its current site until 1927 when it provided three laboratories, a studio, a domestic sciences room, a library, a gymnasium and a sports hall. Since then the school has more than doubled in size with the majority of development in the late 1960s and early 1970s.

10. The redevelopment of the school is progressing towards implementation in connection with the BSF (Building Schools for the Future) programme. The Council granted planning permission on 30 August 2007 for the extension and refurbishment of Eltham Hill Technology College. The previous Mayor of London also supported the application referred as PDU/1781/01 & 02.

**Strategic planning issues and relevant policies and guidance**

11. The relevant issues and corresponding policies are as follows:

- **MOL**  
  London Plan; PPG2

- **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/energy**  
  London Plan; PPS, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor’s Energy Strategy; Sustainable Design and Construction SPG

- **Flooding**  
  London Plan; Mayor’s draft Water Strategy; PPS25, RPG3B

- **Ambient noise**  
  London Plan; the Mayor’s Ambient Noise Strategy; PPG24

- **Transport**  
  London Plan; the Mayor’s Transport Strategy; PPG13

- **Parking**  
  London Plan; the Mayor’s Transport Strategy; PPG13

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 2006 Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004).
Metropolitan Open Land

13 The application site (as shown in Fig 1.2) is to the North of an Area of Special Character, Historic Landscape and Conservation Area centred on Eltham Palace. The area immediately to the south (Queenscroft Park) is designated as MOL and part of the ‘Green Chain’. There is a Grade II listed garden house (the Van Dyke building) and associated boundary wall on the site that is presumed to be a remnant of the original farmstead. The wall encloses a small garden known locally as the Van Dyke Garden. Both the western part of the school site and the park to the south and west (Queenscroft Recreation Ground or Park) are designated as MOL.

14 The most significant aspect of this development relates to its impacts on Metropolitan Open Land (MOL). Chapter 3 of the London Plan is concerned with, amongst other things, open space. Policy 3D.8 (Realising the value of open space and Green Infrastructure) states that “The Mayor will work with strategic partners to protect and promote London’s network of open spaces, to realise the current and potential value of open space to communities and to protect the many benefits of open space…” In addition, London Plan policy 3D.10 (Metropolitan Open Land) also applies: “The Mayor will and boroughs should maintain the protection of Metropolitan Open Land from inappropriate development.”

![Fig 1.2 The application site key features in the context of MOL (Source: applicant’s design and access statement)](image)

15 The reference to “inappropriate development” flows directly from PPG2, which sets out the Government’s policy towards Green Belts, but which equally, applies to the protection of MOL. This policy is one of the most robust and enduring in the planning system. The London Plan states that the protection of London’s MOL should be maintained and points out that there is a general presumption against inappropriate development on MOL, and that MOL should be given the same level of protection as the Green Belt. Policy 3D.10 states that “Essential facilities for appropriate uses will only be acceptable where they do not have an adverse impact on the openness of MOL.”

16 PPG2 identifies the purposes of Green Belt, which are: to check the unrestricted sprawl of large built up areas; to prevent neighbouring towns from merging; to assist in safeguarding the countryside from encroachment; and to assist in urban regeneration by encouraging the recycling of derelict land. Government guidance states that development is inappropriate unless it is for the following purposes:
• Agriculture and forestry

• Essential facilities for outdoor sport and recreation; for cemeteries; and for other uses of land, which preserve the openness of the Green Belt

• Limited extension, alteration or replacement of existing dwellings

• Limited infilling or redevelopment of major existing developed sites identified in adopted development plans, which meet the criteria in Annex C of PPG2.

17 The temporary classrooms do not fall into any of these categories and must therefore be treated as inappropriate development. PPG2 states that it is for the applicant to justify very special circumstances that outweigh the harm to MOL and any other harm. In this instance the need to provide continuity of education during the construction of the new school on the adjacent site constitutes very special circumstances. Whilst the proposed temporary classrooms will have detrimental impact on the openness of the MOL, this impact will be temporary (for a temporary period of 2 years maximum) and is outweighed by the benefits to the school of minimising disruption to staff and students during the construction period. The temporary classrooms will also play the fundamental role of allowing the redevelopment of the school to take place, providing improved quality educational facilities for the school and the wider community. Not only will high quality indoor and outdoor recreational and educational facilities be provided through the overall redevelopment of the school, but public access will also be increased so that a wider area of the community will benefit from its provision.

Urban design

18 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 polices 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.

19 Relationship to context: The proposal is located on playing fields within the school grounds, on land designated as Metropolitan Open Land. The area immediately south of the site is Queenscroft Park, also MOL and part of the Green Chain. The 3-storey tall proposed building is appropriately scaled to the surrounding context of 2 to 4-storey buildings, with the taller buildings associated with the existing school on site. Clarification should be provided over the proposed height of the temporary accommodation, as the design and access statement suggests that 2-storey building is proposed (paragraph 3.5.1), whilst the submitted drawings suggest a 3-storey building.

20 The site features a change in level of approximately 5 metres, with the proposed building on the lowest part of the site. Beyond the site, the ground level within the MOL continues to fall away from the site. Mature trees line the southern and western boundary of the site, and will screen the MOL beyond the site boundaries from the temporary building on site. The changes in ground level and mature trees limit the visual impact of the 3-storey building. A retaining wall is also present along the southern and western edges of the site, and creating a physical barrier, which effectively delineates which area of MOL, is associated with the school and which area is associated with the park. A planning application has already been approved for a 1-storey permanent structure to the north of this proposed temporary structure, also on MOL but along the north end of the site. Construction of this building will commence whilst the temporary
accommodation is on site, and will itself alter the character of the immediate MOL area, particularly as seen from Eltham Hill.

Fig 1.3 The scale and elevations of the proposed scheme (Source: applicant’s design and access statement)

21 The scale, massing and elevation of the building as shown in Fig. 1.3 has been established to allow a shorter construction programme on the main school site, thereby reducing the amount of time the temporary structure will be in place.

22 The applicant has provided indicative views of the site with wireline drawings of the estimated impact of the buildings on views into and out of the MOL. There will be limited visibility of the buildings when surrounding trees are in full bloom, however in winter the structure will be more prominent due to the absence of leaves on the trees. It is unclear from the submitted plans how the temporary building will be accessed for those approaching from Eltham Hill, the main road. The proximity of the northern elevation of the building to the hoardings for block D also raises concern with regards to access, as it appears that the northern elevation is intended to be the main entrance, although as noted above, this detail was not provided.

23 The access statement suggests that the building entrance will be highlighted using suitably designed signage and visual contrast; however, this is not illustrated on plan or elevation.

24 Open Space/Public Realm: Details of the temporary landscaping have not been provided, and it is unclear to what extent the landscape plans related to the full planning permission for the permanent structure will be implemented for this scheme. No information has been provided in plan form of the proposed access route into the building, or of the surrounding landscape during the construction phase.
As a result of this, the proposed urban design does not fully comply with Policy 4B.1 of the London Plan, however, clarification and the provision of further detail would address this.

**Inclusive Access**

The applicant has submitted an Access Statement prepared by JMU Access Partnership. It sets out the applicant’s commitment to ensuring accessibility and inclusion for disabled people in the development of the temporary classrooms for Eltham Hill and references various key documents including the London Plan and relevant SPGs. In summary, it states, “The Access Statement responds to the objectives set out in relevant planning policy, the requirements of legislation including the DDA and Part M of the Building Regulations as well as a range of best practice guidance. Where design details have not yet been specified at this stage, including for example details of internal facilities, the Statement sets out principles that will be followed as the design is progressed. In summary, the Statement addresses the following aspects of inclusive access: the accessibility of the approaches to the site and potential measures to ensure that access from the site boundary to the temporary classrooms is safe and usable; the building entrance and potential good practice features to be incorporated into the entrance design; and internal horizontal, vertical circulation and internal facilities and the features that will be taken into account as the design progresses to ensure an inclusive environment.”

The access statement suggests that a passenger lift will be provided near the building entrance, which suggests that the main entrance to the building is located at the point farthest away from Eltham Hill. It is unclear how this arrangement relates to any provision for blue badge staff or visitor parking, or pickup and drop-off arrangements. It is also unclear whether all the entrances will be level; the ground floor plans suggest level access, but the elevations show the main doors to be slightly raised above ground level. The design of the landscaping and the public realm is crucial to how inclusive the development is to many people. The pedestrian routes to all of the different buildings on the site should be designed to ensure full and easy access for all users. The design and access statement should show how disabled people access each of the buildings safely, including details of levels, gradients, widths and surface materials of the paths and how they are segregated from traffic and turning vehicles etc.

In summary, although the applicant’s commitment to inclusive design is welcomed, the GLA requires that these commitments are secured through appropriate planning conditions in order to demonstrate full compliance with Policy 4B.5 of the London Plan.

**Climate change mitigation and adaptation**

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 policies set out ways in which developers must address mitigation of and adaptation to the effects of climate change.

Policies 4A.2 to 4A.8 of the London Plan focus on how to mitigate climate change, and the carbon dioxide reduction targets that are necessary across London to achieve this.

Sustainable Design and Construction: The applicant has produced documentation responding to the essential and preferred standards of the Mayor’s supplementary planning guidance on sustainable design and construction. It is accepted that a number of requirements (e.g. green/brown roofs) are not viable given the standardised/modular construction and temporary nature of the buildings.
The building proposed is a standard modular temporary building. Total carbon dioxide emissions from the site (including emissions not covered by Building Regulations such as small power loads) are 320 tonnes carbon dioxide per year. The manufacturer of the unit has calculated the carbon dioxide emissions of the building using Building Regulations approved software simplified building energy method (SBEM).

The Building Emissions Rate of the proposed temporary classrooms is 53.7kg CO$_2$/m$^2$ compared to the Target Emissions Rate of 33.3kg CO$_2$/m$^2$. This means that the current proposal would not pass the requirements of Part L of Building Regulations, mainly due to the use of electric heating. However, because the intended use of the building is less than two years, the building only needs to meet elemental performance criteria of Building Regulations, which according to the applicant, this building complies with. The manufacturer of the unit has identified possible demand reduction improvements to the base building design, for example energy efficient lighting, lighting controls and improved U-values. However, according to the applicant these items in accumulation would still not result in the building meeting current building regulations and are not deemed to be cost effective. Notwithstanding this the applicant is encouraged to make efforts to improve the energy efficiency of the unit, specifically in relation to improved lighting efficiency and controls, which is considered good practice.

Renewable energy technology: As the building’s lifetime is only 18 months, the applicant’s decision not to incorporate renewable energy technologies is acceptable. If at a later date the applicant applies for planning permission to extend the lifespan of the building, measures should be put in place to ensure this unit is connected into the heating network of the school and incorporate renewable energy technologies.

Heating infrastructure: Electric heating is proposed. Although this is not normally acceptable under London Plan policy 4A.6 and the preference of heating systems it establishes, in this particular case, because of the temporary nature of the building, this is acceptable.

Flooding

The site is outside of the flood risk zones, but given the scale of the temporary classrooms, there are likely to be implications for surface water drainage, as the current sewers are know to be inadequate. The applicant has acknowledged the need to address this. The applicant should have regard to the drainage hierarchy set out in policy 4A.14 of the London Plan and a drainage system as high up the hierarchy as possible. The final system should be secured by condition in order to fully comply with Policy 4A.14 of the London Plan.

Noise

The noise assessment provided does not, as claimed, follow the procedures laid down in BS4142. However, the low level of noise predicted at the nearest residential properties, due to break out from within the temporary classrooms, suggests that significant disturbance is unlikely. The proposal therefore complies with 4A.20 of the London Plan.

Transport for London’s comments

Given that the temporary proposal for the site does not significantly differ from the current use or existing permitted development, except for construction movements, TfL accepts that it is unlikely to have any adverse effect on the surrounding Transport for London Road Network or Strategic Road Network.
39 It is unclear whether any additional staff car parking spaces will be provided on site as a result of this development. TfL would recommend that the existing level be retained or further decreased in order to promote more sustainable travel measures. This should be clarified in the school travel plan, which is a requirement of the main school’s redevelopment.

40 Despite Eltham Hill’s designation as a signed on-road cycle route, the transport section of the Planning Statement identifies that the number of staff and students cycling to/from the school is negligible due to the unsafe condition of the surrounding roads. TfL would therefore require that measures to improve the safety of cyclists on the surrounding network be included as part of the development proposals, that better connections be provided to link existing cycling facilities to the site and that measures to reduce vehicle speeds be further explored. Where considered necessary, all of these measures should be funded by the applicant and secured through a section 106 agreement or, if appropriate, by way of a planning condition.

41 The report also identifies that despite the existing provision of 3m-width pavements outside the school, footways can become very congested at peak times. TfL therefore requires the applicant to investigate the potential for widening footpaths in this particular location and for introducing further improvements, which will improve the pedestrian environment.

42 All construction traffic, both for the temporary accommodation and permanent replacement buildings should be appropriately managed so as to minimise the impact on the surrounding highway network, especially at peak times. The provision of construction logistics methods, however, appears to have been comprehensively addressed by the applicant with the inclusion of a Construction Traffic Management Plan, along with forecasted traffic volumes and a detailed construction programme, which is welcomed. Clarification on vehicles type, routing and fuel use, as well as working hours should also be identified as opportunities for the contractor(s) to improve the sustainability of the construction process. The arrangements for servicing also appear to be satisfactory in order to maintain operations safely on the rest of the site.

43 Overall, further work is required, as detailed above, in order for the transport strategy to comply with the London Plan policies 3C.21, 3C.22 and 3C.23.

London Development Agency’s comments

44 The London Development Agency supports Building Schools for the Future programme, which would deliver numerous aspirations as set out in the London Plan (Consolidated with Alterations Since 2004). Provided the principle of development is demonstrated to be acceptable in paragraphs 13 to 18 (MOL issues), the LDA does not object to the scheme.

45 In accordance to London Plan policy 3B.11 “Improving Employment Opportunities for Londoners”, the LDA encourages Greenwich Council to formalise an initiative for creating training and employment opportunities for unemployed people from the local area during the construction and operational phases of the development in order to comply with the London Plan policy 3B.11. The LDA can provide further details on these matters.

Local planning authority’s position

46 Greenwich Council officers have yet to confirm their position.

Legal considerations

47 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. 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

48 There are no financial considerations at this stage.

Conclusion

49 London Plan policies on MOL, urban design, access, energy, transport and parking and employment and training are relevant to this application. In general, the application complies with the general principles of these policies, for the following reasons:

- MOL: the current proposal for the erection of temporary three-storey building is inappropriate development on MOL. However, the need to provide continuity of education constitutes the very special circumstance. Therefore, the current proposal is in line with Policy 3D.10 and it complies with the London Plan.

- Urban design: Overall the scheme is well designed, however further clarification is required on the proposed height of the temporary accommodation, the access to the main entrance of the temporary building and the details of surrounding landscape. These details are required to fully comply with policy 4B.1 of the London Plan.

- Access: The applicant’s commitment to inclusive access guidelines is welcomed. However, the details need to be incorporated in a revised access statement and secured through appropriate planning conditions. The signage and visual contrast that will be highlighting the building entrance need to be illustrated on plan or elevation. These amendments are necessary to ensure that the access strategy fully complies with policy 4B.5 of the London Plan.

- Energy: The proposed electric heating and the applicant’s decision not to incorporate renewable energy technologies are acceptable because of the temporary nature of the building.

- Flooding: Details on the management of surface water run-off are required to comply with policy 4A.14 of the London Plan.

- Transport and Parking: Given the temporary nature of the scheme the development will not have adverse effect on the surrounding transport strategic road network. Safety measures for pedestrians and cyclists need to be implemented. The transport statement does not comply with policies 3C.21, 3C.22 and 3C.23 of the London Plan.

- Employment and Training: The applicant is required to produce employment and training strategy that maximises the benefit of the local people in order to comply with policy 3B.11 of the London Plan.

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

55 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming totally compliant with the London Plan:
• Urban design: Provide further clarifications on the proposed height of the temporary accommodation and on access to the main entrance of the temporary building and the surrounding landscape.

• Access: Provide revised access statement incorporating the details of the inclusive access guidelines for the school and illustrate on plan or elevation the signage and visual contrast that will be highlighting the building entrance and secure appropriate measures by condition.

• Flooding: Provide details on the management of surface run-off risk and secure by condition.

• Transport and Parking: Implement safety measures for pedestrians and cyclists.

• Employment and training: Produce employment and training strategy that maximises the benefit of local people.

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