

# Former King's Wood School, Settle Road, Romford

in the London Borough of Havering

planning application no.P1572.15

## 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

Construction of a new primary school providing 2,232 sq m (GEA) of educational floor space (use class D1) comprising primary school facilities, grassed playing pitch and outdoor play facilities, together with associated works, including access, car parking and landscaping arrangements.

## The applicant

The applicant is the **Draper's Multi-Academy Trust**. The agent and architect is **Scott Brownrigg**.

## Strategic issues

The principle of a new school facility on the site is acceptable in strategic policy terms. There are, however, outstanding strategic planning issues which will need to be addressed, namely in respect of **design, climate change** and **transport**.

## Recommendation

That Havering 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 63 of this report; but that the possible remedies set out in this 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 6 November 2015 the Mayor of London received documents from Havering 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 17 December 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. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3D of the Schedule to the Order 2008:

*'Development on land allocated as Green Belt or Metropolitan Open Land in proposals for such a plan, or in proposals for the alteration or replacement of such a plan, and which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.'*

3 Once Havering 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 The 1.23 hectare application site is located in Harold Hill, Romford and is currently vacant, following the demolition of the King's Wood School that formerly occupied the site. The site is bounded by the Draper's Academy to the north, which is a newly built school (2010) that replaces King's Wood Secondary School. To the west of the site is Settle Road, which is a dead-end road forming one of the main arrival routes to the academy. There is a hard court school games area abutting the site boundary to the east with playing fields and woods beyond. Sheffield Drive lined with residential housing bounds the site to the south.

6 The site lies at the edge of the built up area within the Green Belt, less than 1 mile inside the M25 motorway. The site is designated as Green Belt land in the Council's Local Development Framework Proposals Map 2008.

7 In terms of transport, the nearest section of the Transport for London Road Network (TLRN) is the A12, Colchester Road, approximately one kilometre south of the site. The application site is also served by two bus routes plus a school bus, with the nearest stops located on Dagnam Park Drive with services providing access to Romford town centre, Harold Wood station, Gallows Corner and Rainham. There are no rail stations located within a reasonable walking distance to the site, with the closest Harold Wood located some two kilometres south of the site. Consequently the site records a poor public transport accessibility level (PTAL) of 1-2, out of a range of 1 to 6 where 6 is the highest.

## **Details of the proposal**

8 The proposal is for the construction of a two-form entry primary school (the Draper's Maryland Primary School) comprising primary school facilities over two-storeys, grassed playing pitch and outdoor play facilities, together with associated works, including access, car parking and landscape arrangements. The application proposes a total of 2,232 sq.m.(GEA) of educational floorspace. The proposed building footprint is 1,319 sq.m.

9 The current application is for full planning permission. The site already has outline planning permission for D1 use as part of wider outline consent for a 'learning village'. The outline application's approved parameter plan indicates Block 3 Pyrgo Primary School on the site of the proposed Draper's Maylands Primary School and Block 4 (which appears to include the

north-west corner of the proposed Draper's Maryland Primary School site) is indicated as a gymnasium for Draper's Academy.

## Case history

10 The application site falls within a wider site that was granted outline permission by the Council on 24 December 2009 for educational use as part of a wider new 'learning village'. This was subject to the submission of further details on the reserved matters by 24 December 2014 (LPA ref. P0682.09). The Mayor considered the wider new 'learning village' outline application on 14 October 2009 and allowed the Council to determine the case itself (GLA ref. PDU/2431).

11 The proposed development was for the amalgamation of two existing education sites, Havering College's Quarles Campus and the King's Wood Campus (on which Pyrge Priory Primary School, King's Wood School and Dycorts Special Educational Needs School are currently located) and the relocation of the existing Havering College Quarles Campus, which is also in Green Belt, to the King's Wood Campus site thereby allowing the Quarles Campus to revert to Green Belt.

12 Phase 1 of the outline permission has been implemented with the construction of the Draper's Academy following the submission and approval of reserved matters, however, no reserved matters have been submitted in relation the rest of the site which includes the redevelopment of Havering College's existing accommodation from its Quarles Campus onto the Learning Village site and the return of the Havering College Quarles Campus site to undeveloped Green Belt.

13 An application to extend the extant outline planning permission was presented to the Mayor on 11 March 2015 (GLA ref. 2431a). The Mayor accepted the principle of the new 'learning village' on the site but raised some strategic planning issues with regard to energy and transport that are still outstanding. Whilst the extension of time was granted permission by Havering Council on 12 March 2015, the acceptability of the proposal is still subject to the Mayor's direction.

14 At a pre-application meeting with Havering Council on 15 June 2015 for the proposed Draper's Maylands Primary School, it was agreed that a detailed planning application would be submitted for the new primary school, rather than a reserved matters application as previously intended.

15 The proposed school redevelopment was also discussed with GLA officers at pre-application stage on 21 July 2015.

## Strategic planning issues and relevant policies and guidance

16 The relevant issues and corresponding policies are as follows:

- |                |  |
|----------------|--|
| • Green Belt   | <i>London Plan;</i>  |
| • Education    | <i>London Plan; Social infrastructure SPG;</i>                                 |
| • Urban design | <i>London Plan;</i>  |
| • Access       | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</i> |
| • Energy       | <i>London Plan; Sustainable Design and Construction SPG;</i>                   |
| • Transport    | <i>London Plan; the Mayor's Transport Strategy.</i>                            |

17 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Havering Council's 2008 Core Strategy and Development Control Policies DPD, the Council's 2008 Site Specific Allocations DPD and the London Plan (Consolidated with Alterations since 2011).

18 The National Planning Policy Framework and Planning Practice Guidance to the National Planning Policy Framework, the London Plan Parking Standards Minor Alterations to the London Plan Consultation Draft (April 2015) and the draft Havering Local Plan are also relevant material considerations.

## **Principle of development - Provision of education facility on Green Belt**

19 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. It also supports the multiple use of education facilities for community use. London Plan Policy 7.16 accords protection to London's Green Belt (GB) and resists inappropriate development, except in very special circumstances.

20 As mentioned in paragraph 6 above, the application site is on Green Belt land as designated by the Council's Proposals Map. At the national level, the National Planning Policy Framework (NPPF) advises local planning authorities to regard the construction of new buildings as inappropriate in Green Belt. Exception to this are:

*the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*

*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.*

21 A comparison of the footprint and building height of the proposed primary school to the former King's Wood School and outline permission is shown in table 1 below:

	Former King's Wood School (demolished)	Proposed	Outline	Change from demolished school
Building footprint (sq.m.)	4,009	1,319	1,960	-2,690
Building height (m)		Up to 8.1m	Up to 10.5m	-2.4m

Table 1: Comparison of schools

22 Based on the above, the proposed development can be considered as an exception to inappropriate development, given that the footprint of the proposed building is less than the footprint of the former King's Wood school buildings and the footprint of the primary school included in the outline permission, and given that the proposals are for replacement of an education facility on the site.

23 Nevertheless, a case for 'very special circumstances (VSC)' has been presented by the applicant to justify the proposals. The VSCs given by the applicant can be summarised as follows:

- The development will provide primary school places in an area of need and in an area that has previously suffered from low levels of education attainment;
- The development will offer community use of school facilities outside of school hours, subject to an agreement being in place between appropriate organisations;
- The proposal will contribute to the regeneration of the area.

24 Given the London's school places crisis, London Plan Policy 3.18 strongly supports development proposals which address the current and projected shortage of primary school places. The principle of providing a school in an area of need in Harold Hill would therefore be supported in principle in strategic terms.

25 Furthermore, very special circumstances were also demonstrated to justify the proposed school development on Green Belt land in the learning village wider outline permission.

26 A Legal Agreement between the Council and Havering College negotiated as part of the Learning Village outline permission required that the buildings on the Quarles site be demolished and land restored within 3 years of occupation of any new college building on the King's Wood Campus site. Due to changes in ownership of the land since the original grant of outline permission, a condition secured by the Council as part of the renewal application ensures that that no other institute should occupy the new building until the Quarles Campus has been vacated and the site cleared.

27 For the reasons set out above, the proposal does not constitute inappropriate development and can therefore be supported.

#### Impact on openness

28 The site is currently vacant following the demolition of the former school buildings on the site. Therefore it is inevitable that the building will impact on the openness of the Green Belt, although it is acknowledged that there was a larger building on the site. The applicant has argued that it had designed the building to minimise the impact on the openness of the Green Belt, in particular, by locating the building close to the site's western boundary. It also advised that the site would provide a greater sense of openness than the previous King's Wood school buildings at the site. This is further discussed in the urban design section of this report.

#### Community use

29 London Plan Policy 3.18E encourages development proposals for schools to maximise the multiple use of educational facilities for community or recreational use. As mentioned above, it is the applicant's intention to extend the use of the school facilities to the community outside school hours. This is strongly supported and the applicant is encouraged to submit a community use plan, which demonstrates the extent of the proposed community uses in a form that can be secured by the Council to ensure delivery.

30 The sharing of facilities between the proposed school and the adjacent academy is also strongly supported by London Plan Policy 3.18F.

## **Design**

31 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.

32 The scheme is generally well thought out. The applicant's proposal to form a defined building line along Settle Road is supported and the location of office and ancillary spaces along this edge provides potential for optimising passive surveillance which is welcomed.

33 The building's alignment with the Draper's Academy plaza is welcomed and this results in a welcoming and legible public facing frontage and direct access into the proposed community facility. The internal layout of the school is supported and is based on the Education Funding Agency's (EFA) design principles, with the linear plan resulting in good daylight penetration and passive ventilation to teaching spaces. Ground floor classrooms are designed to open directly out onto the secure play space, with views over the open Green Belt land to the east. These factors give potential to achieve a high quality teaching environment.

34 As discussed at pre-application stage, it is understood that the applicant intends to sub-divide the area of woodland at the south eastern portion of the site with secure fencing in order to minimise day to day maintenance requirements and costs for the school. This is supported in principle although it is not clear from the submission documents whether this is included within the red line boundary. GLA officers would welcome clarification on how this area will be managed and secured.

35 The form and massing strategy is supported, raising no specific strategic issues. However, this is subject to the submission of a views analysis to enable officers to assess the visual/massing impact the proposal will have on the open quality of the surrounding Green Belt. Notwithstanding this, it is acknowledged that the building has been located away from the existing foundations of the former school buildings which would be likely to create construction difficulties and increased build costs, and the building is aligned along the site's western edge to form part of a larger campus of education facilities, including Drapers' Academy immediately to the north of the site. The applicant has demonstrated that the impacts on the openness of the Green Belt have been sufficiently mitigated through the design and location of the proposed building.

36 The simple and clean-lined architectural response to the site is supported in principle however some concern is raised in relation to the extent of fibre cement board cladding. As such, the Council is encouraged to secure key details of all facing materials and window reveals to ensure the highest possible build quality is achieved and that the proposal is designed to appear as an integral element of the wider campus.

37 With regard to inclusive design, the applicant should also clarify whether the lift provided will be able to be used in an emergency to ensure safe egress for disabled people.

## **Climate change adaptation**

38 London Plan Policy 5.10 promotes urban greening, such as new planting in the public realm and multifunctional green infrastructure. London Plan Policy 5.12 seeks to prevent flood risks and Policy 5.13 raises the importance of utilising sustainable urban drainage systems.

39 The flood risk assessment (FRA) prepared by Water Environment Ltd confirms that the site is located within Flood Risk Zone 1. The Environment Agency's mapping indicates that a small part of the site is at risk of surface water flooding. There is also significant surface water flood risk in the wider catchment, particularly around the Weald Brook, toward which surface water from the site would be likely to flow.

40 The FRA states that surface water drainage will be designed to collect and contain below ground the 100 year return period rainfall event, including a 30% allowance for climate change.

It states that the soil conditions likely preclude infiltration techniques. However, no consideration has been given to the use of green roofs on the school buildings, which are compatible with the photovoltaic panels proposed for the roof (e.g. <http://www.livingroofs.org/pvs-and-green-roofs>).

41 There has also been no consideration given to the use of surface-level water storage features on the site, such as swales and ponds. These not only help attenuate rainwater but also provide educational opportunities and contribute towards London Plan Policies 2.18 (green infrastructure), 5.11 (green roofs) and 7.19 (biodiversity), as well as 5.13 (sustainable drainage). Ponds would be particularly appropriate given the ponds within nearby Duck Wood, which were stated within the Design and Access Report to support “rare plants and amphibians”.

42 The proposals are acceptable with regard to London Plan Policy 5.12. Further details of sustainable drainage measures will be required to determine whether the proposals are acceptable in relation to London Plan Policy 5.13.

## **Climate change mitigation**

### Energy efficiency standards

43 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 low energy lighting and mechanical ventilation with heat recovery.

44 The applicant has stated that a dynamic overheating assessment using CIBSE TM52 has been undertaken. The applicant is required to provide the overheating assessment and to also outline the measures taken to avoid overheating and minimise cooling demand in line with Policy 5.9.

45 The applicant has provided the carbon emission savings per square metre rather than the required format of tonnes per annum for each stage of the energy hierarchy. See Table 1 and Table 2 in the latest GLA assessment guidance for the required format:  
<https://www.london.gov.uk/file/22340/download?token=En8l3jJy>

46 However, taking the floor area listed in the energy statement the development is estimated to achieve a reduction of 5 tonnes per annum (19%) in regulated CO<sub>2</sub> emissions compared to a 2013 Building Regulations compliant development. The BRUKL sheet, including efficiency measures alone should be provided to support the savings claimed.

### District heating

47 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 has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available. The school will be supplied from a single plant room (17 sq.m.) to be located on the first floor.

### Combined Heat and Power

48 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

49 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 38 sq.m. of roof mounted Photovoltaic (PV) panels. A roof layout drawing should be provided detailing the location of the PV array.

50 A reduction in regulated CO2 emissions of 1 tonnes per annum (7%) will be achieved through this third element of the energy hierarchy. The applicant should provide further information on the available roof area for PV, including whether there is potential to increase the size of the PV array in order to maximise the on-site carbon emission savings.

51 The applicant should provide the total Part L 2013 carbon emission figures in tonnes per annum for the 'Be Green' stage of the energy hierarchy.

## Summary

52 A reduction of 6 tonnes of CO2 per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 25%. The carbon dioxide savings fall short of the target within Policy 5.2 of the London Plan. The applicant should consider the scope for additional PV panels aimed at achieving further carbon reductions. The applicant should provide any updated results in tonnes per annum for each stage of the energy hierarchy (rather than per square metre).

## **Transport**

### Transport impact

53 The scheme proposes measures to stagger the school starting and finishing times to spread the intensity of drop-off and pick-up throughout the morning and afternoon school peak. There is no concern that the trip generation from the proposed primary school will give rise to any significant impacts that will affect the operation of public transport services from this particular proposal due to the localised scale of a primary school's catchment. However, it is noted that TfL have previously raised concerns about crowding and bus capacity in the area since the 2009 outline application. This issue, along with the provision of an on-site bus stand facility, will still need to be addressed as part of any future development of the learning village.

### Walking and cycling

54 The applicant has carried out both pedestrian and cycling environment review system (PERS and CERS) audits for key links and routes within 250 metres of the proposed school. These have identified some issues with the quality of footways and signage. Appropriate contributions should be secured by the Council to rectify some of the identified deficiencies to enhance the pedestrian and cycling environments in accordance with London Plan Policies 6.9 and 6.10.

### Cycle parking

55 A total of 10 cycle parking spaces in an insecure, unsheltered area are proposed as part of this scheme. It is also proposed that the primary school shares existing facilities with the neighbouring Draper's Academy. No end-of-trip facilities (showers, changing rooms etc.) for staff are proposed. Overall, this is not considered an appropriate arrangement and the overall



provision of long-term cycle parking spaces and supporting infrastructure is significantly below the requirements set out in London Plan Policy 6.13. This should be reviewed in line with London Plan policy, appropriate cycle parking for the site should be secured by condition and /or Section 106 agreement. The applicant is encouraged to incorporate scooter storage facilities due to their increasing popularity, particularly with younger primary students.

#### Car parking

56 A total of 29 car parking spaces are proposed which includes two blue badge spaces, which is in line with London Plan Policy 6.13. In addition, provision for six electric vehicle charging points (EVCP) and passive provision for a further three spaces should be provided as part as the scheme to satisfy the requirements of London Plan Policy 6.13. These should be secured by condition.

#### Construction logistics

57 A construction logistics plan (CLP) should be secured via appropriate planning conditions/ obligations. The CLP should include the cumulative impacts of construction traffic, likely construction trips generated, and mitigation proposed. Details should include; site access arrangements, booking systems, construction phasing, vehicular routes and scope for load consolidation or modal shift in order to reduce the number of road trips generated. This CLP should also be submitted and approved before any works commence, including site preparation and enabling works.

#### Travel planning

58 The applicant has submitted a travel plan which is welcomed. The final versions of this plan should be secured, managed, monitored and enforced through the s106 agreement.

#### Summary

59 Issues regarding the provision of cycle and car parking should be resolved for the development to accord with transport aspects of the London Plan.

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

60 Council officers are generally supportive of the application as it follows the principle of the Learning Village.

### **Legal considerations**

61 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

62 There are no financial considerations at this stage.

## Conclusion

63 The application is generally acceptable in strategic planning terms. However, it does not comply with recent changes in London Plan policy and the reasons and the potential remedies to issues of non-compliance are set out below:

- **Principle of development:** The proposal does not constitute inappropriate development and can therefore be supported.
- **Urban design:** Some concern is raised in relation to the extent of fibre cement board cladding. The Council is encouraged to secure key details of all facing materials and window reveals to ensure the highest possible build quality is achieved and that the proposal is designed to appear as an integral element of the wider campus. Further information should be provided on how the area of woodland at the south eastern portion of the site will be managed and secured and on the capacity of the lift to be used as an egress for disabled people in an emergency.
- **Climate change adaptation:** Further details of sustainable drainage measures will be required to determine whether the proposals are acceptable in relation to London Plan Policy 5.13.
- **Climate change mitigation:** The applicant should consider the scope for additional PV panels aimed at achieving further carbon reductions. The applicant should provide any updated results in tonnes per annum for each stage of the energy hierarchy (rather than per square metre). The applicant is also required to provide further information on overheating.
- **Transport:** Issues regarding the provision of cycle and car parking should be resolved and other appropriate transport conditions secured.

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