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**PLANNING STATEMENT – ROTHERHITHE
JUNIOR AND INFANT SCHOOL,
ROTHERHITHE NEW ROAD, LONDON,
SE16 2PL**



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1.0 Introduction

1.1 Summary

- 1.1.1 This is an application for planning permission for a new primary school and associated play space on the site which is currently in use as a two FE Primary School.
- 1.1.2 The proposal will involve the demolition of the existing building and the erection of a new two storey; three form entry Primary School building with the main entrance to Hawkstone Road.
- 1.1.3 Careful consideration of Council policies and a thorough site analysis has resulted in an innovative development that would enhance the functionality of the school, whilst also providing a much needed increase in the capacity of primary school spaces within the local area which is located within action area which will see significant population increases over the coming years.

1.2 Planning Statement

- 1.2.1 This statement has been prepared on behalf of Southwark Council (the applicant) in support of an application for full planning permission to demolish the existing building and to build a new three FE school to provide additional primary school spaces.
- 1.2.2 The purpose of this statement is to examine the planning issues raised by the current development proposals for the application site. In particular, this statement identifies and describes the key opportunities presented by the proposed redevelopment of the site.
- 1.2.3 The statement also provides a comprehensive analysis of the relevant planning policy framework at national and local levels. As such, the planning statement is structured as follows:

Section 1: Introduction

Section 2: The Application Site and Surrounding Area – sets the context the current proposal and provides a detailed description of the application site and its previous uses;

Section 3: The Proposal – describes the proposed development;

Section 4: Policy Context – summarises the planning policy relevant to this proposal at national and local levels;

Section 5: Planning Considerations – reviews the proposal in terms of the relevant policy context and other material considerations; and

Section 6: Conclusion

1.3 Supporting Application Documents

1.3.1 This planning statement together with the accompanying application documents indicates how the proposed development aims to be compliant with national and local planning policy and will sensitively provide a sustainable high quality environment for the school. A number of drawings, illustrative material and reports accompany this statement to help address specific issues and to explain the proposal in more detail.

Accordingly this planning statement should be read in conjunction with the following:

- Design & Access Statement – Feilden Clegg Bardley Studios
- Drawings and Illustrative Material – Feilden Clegg Bardley Studios
- Ecological Assessment Report – The Ecology Consultancy
- Noise and ventilation Assessment – Ranmoll UK
- Air Quality Assessment– Waterman Group
- BREEAM Pre Assessment Indicator – Faithful and Gould
- Transport Statement – MLM Consultants
- Daylight and Sunlight Assessment – GL Hearn
- School Travel Plan – MLM Consultants and LBS school travel planners
- Flood Risk Assessment – RSK Group
- Tree Assessment – The Ecology Consultancy
- Energy Statement – Waterman Group
- Lighting, Ventilation and Utility Statements

2.0 The Application Site and Surrounding Area

2.1 Site Description & Location

2.1.1 The subject site refers to an island site containing a two storey primary school building that is currently in use. The buildings within the site are set to be demolished as part of this proposal, however the new proposal would allow for the school to remain on site during the construction works.

2.1.2. The site is surrounded by public highways to the Hawkstone Road to the northwest and Rotherhithe New Road to the south.

2.1.3. There are no listed buildings on site, and the site is not situated within any conservation areas. The site is also located within an Air Quality Management Area.

2.1.4. The site has a Public Transport Accessibility Level (PTAL) rating of 5 which indicates a high level of accessibility to public transport modes with Surrey Quays Overground station and Canada Water Underground Station within close proximity to the site. There are also a number of bus routes within the area along Hawkstone Road and Lower Road.

2.2 Planning Policy Designations

2.2.1 The key planning policy designations are as follows:

- Urban density zone
- Flood Risk Zone 3
- PTAL 5
- Controlled Parking Zone (CPZ)
- Air Quality Management Area

2.3 Surrounding Area

2.3.1. The surrounding area consists generally of a residential nature with residential towers situated to the southwest and east of the site. To the north of the site is a former public house which has now been converted into a residential use, a doctor's surgery and to the southeast of the site there is also a Day Care Centre.

2.3.2. There are also a number of residential properties to the northeast of the site there are four storey residential properties that adjoin the boundary to the school site.

2.3.3. To the northwest of the site is the entrance into the Southwark Park Sports club and then onto the wider park area.

2.4 Relevant Planning History

2.4.1. 18/EQ/0198 – A Pre-application enquiry was submitted in relation to the demolition of existing single storey Rotherhithe Primary School, associated outbuildings and playground and replacement with a new-build two-storey primary school and new associated playground, parking area and MUGA. No response was issued in regards to this pre-application, however during the meeting, it was understood that the general scale and design of the building was acceptable, subject to further architectural refinement. Further work was required in order to overcome concerns regarding how the site could be serviced.

2.4.2. 17/AP/3038 – Planning permission was granted for the retention of single-storey modular building providing two classrooms for a temporary period of 3 years – 10/10/17.

2.4.3. 14/AP/2526 – Planning permission was granted for the provision of a temporary classroom building for a period of 12 months - 05/12/2014.

2.4.4. 14/AP/1938 – Planning permission was granted for the Construction of single storey extension to existing classrooms, meeting room and store fronting Rotherhithe New Road - 04/08/2014.

2.4.5. 13/AP/3503 – Planning permission was granted for a new front extension to form additional nursery classroom /space, meeting area and additional WC facilities - 12/12/2013.

2.4.6. 13/AP/0807 – Planning permission was granted for the removal of two trees and installation of new single storey PortaKabin structure adjacent to existing dining room position and form connective walkthrough between the two areas - 22/07/2013.

2.4.7. 07/AP/0274 - Planning permission was granted for the provision of new office accommodation and remodeling of existing main entrance and reception area, and new caretaker's office (all single storey) - 30/03/2007.

3.0 The Proposal

3.1 Description of the scheme

3.1.1 The proposal involves the demolition of the existing buildings on site and the erection of a new two storey, three FE primary school to accommodate approximately 630 pupils within the new school site, plus a 60 place integrated Nursery.

3.1.2 The proposed new school will allow for the existing two FE school, to expand with increased capacity and better provision of facilities for the future pupils at the school. It will also allow for potential for part of the existing school site to be redeveloped at a later date. The current pupil roll of 484 pupils will increase to a total of 690 pupils with an expected increase of staff to about 96 from the current 76 full time and 6 part-time staff members.

3.1.3 The proposed new building will be two storeys and will extend around the northwestern edge of the site with the external play space situated within a central courtyard and to the southern end of the site. A new landscaping scheme is proposed with MUGA to the southwest of the site.

3.1.4 The proposed design details of the development are described in detail within the Design and Access Statement submitted in respect to the site.

3.1.5. 4 car parking spaces will be provided in the south-east corner of the site, 2 of which shall be for disabled This represents a reduction in parking from the present situation. Visitors to the school will be able to utilise the existing on-street parking facilities on Hawkstone Road including the disabled bay adjacent to Park Medical Centre. 36 cycle spaces and 40 scooter spaces will be provided for pupils. The provision is slightly under policy requirements for students, however a substantial portion of the children attending the school travel by scooters and as such the provision of scooter storage would off-set any shortfall.

3.1.6. 12 cycle space for staff will also be provided in this location and will be separated from the student cycle parking. A further 10 cycle spaces for staff will be situated in the car park in the south-east corner of the site. 12 visitor cycle parking spaces will be situated on Hodnett Grove.

3.1.7. The scheme is highly sustainable and has been designed to reach a Bream level of very good. The proposal will also ensure a 35% reduction below 2013

Building Regulations will be achieved with 20% renewables also provided on site in the form of solar PV panels. Further details are outlined within the Energy Statement submitted alongside the application.

3.2 Supporting Documents

3.2.1 As noted in Section 1, in addition to this statement the application is supported by a number of other key documents and supporting evidence. These documents and a summary of key considerations are set out below:

3.2.2 Design & Access Statement –The design and access statement sets out the design considerations in developing the proposed scheme highlighting the key constraints and opportunities. The high quality of design is shown through out the scheme from the urban scale to the internal arrangements of the dwellings.

3.2.3 Ecology Assessment – An initial assessment was undertaken and it was noted that there are no records of bats, however there were habitats present for nesting birds. Potential habitats to be lost would be compensated for through landscaping which would help improved the overall biodiversity of the site. No other protected species were located within the site.

3.2.4 Environmental Noise Assessment - An environmental noise survey has been undertaken and appropriate internal noise criteria have been proposed to ensure an adequate level of protection against noise.

3.2.5 Air Quality Assessment – The report concludes that air quality does not represent a material constraint to the development proposal and that any vibrations will not material harm the future occupiers of any of the buildings.

3.2.6 BREEAM pre-assessment – In accordance with the National Planning Policy Framework, the scheme incorporates a number of sustainable measures, demonstrating that the proposed development has targeted very high standards of design and building quality.

3.2.7 Transport Statement – The Transport Statement sets out an appraisal of the transportation issues relating to the site. The site is considered to have an excellent level of accessibility to public transport with a PTAL rating of 5 and thus there is a significant loss of parking at the school proposed.

3.2.8 Sunlight and Daylight Reports – A daylight and sunlight assessment has been provided with the application which demonstrates that the proposed development would not result in a significant impact on daylight or sunlight within the surrounding properties.

3.2.9 School Travel Plan – The proposal provides sustainable travel modes and the travel plan would encourage both staff and pupils within the school to make use of sustainable travel modes.

3.2.10 Ventilation Statement – A ventilation statement has been prepared by Waterman's which sets out the ventilation strategy for the development.

3.2.11 Arboricultural report – The report outlines that there are 47 individual trees and one group within the site, one individual was attributed Category A status, 25 individuals were attributed Category B status and 21 individuals, and one group were

attributed Category C status. 24 existing trees and 1 group will require removal to facilitate development. Of these, 10 are category B and 14 are category C. Design proposals include planting of 46 new trees replacing those to be removed at a rate of nearly 2 for 1.

3.2.12 Energy Statement – An energy statement has been undertaken as part of the application which advises that the scheme has been designed to meet the required Carbon reduction whilst incorporates a number of sustainable and renewable energy measures, demonstrating that the proposed development has targeted very high standards of design and building quality

3.2.13. Geo-Environmental Site Investigation report – A site investigation report has been prepared as part of this submission which indicated that no significant areas of contamination were identified. As such, risks to the end users of the site are currently considered low.

3.2.14. Flood Risk Assessment – The site is within Flood Zone 3 and therefore a development of this nature would potentially result in significant flood risks. A flood risk assessment has been provided which notes that the site is not at significant risk of flooding as a result of existing tidal protection as a result of the Thames Barrier.

4.0 Relevant Planning Policies

4.1 Government Guidance

4.1.1 National Planning Policy Framework (NPPF) 2018 – the NPPF sets out the Governments planning policies for England. The NPPF has a presumption in favour of sustainable development.

4.1.2 The NPPF states that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as peoples quality of life, including:

- Making it easier for jobs to be created in cities towns and villages;
- Moving from a net loss of bio-diversity to achieving net gains for nature;
- Replacing poor design with better design;
- Improving the conditions in which people live, work, travel and take leisure; and
- Widening the choice of high quality homes.

4.1.3 Section 8 Promoting healthy communities states at paragraph 94 that ‘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 choice in education.

4.1.4 Section 9 ‘Promoting Sustainable Transport’ notes under paragraph 111 that “All developments that will generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- Safe and suitable access to the site can be achieved for all people; and
- Improvements can be undertaken within the transport network that cost effectively limits the significant impacts of the development. Development should only be

prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

4.1.5. Section 11 of the NPPF notes that Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

4.1.6 Section 12 Achieving well-designed places outlines that Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

4.1.7 Section 14 - Meeting the challenge of climate change, flooding and coastal change, and paragraph 96 notes that in determining planning applications, local planning authorities should expect new development to:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- b) the development is appropriately flood resistant and resilient;
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- d) any residual risk can be safely managed; and
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

Section 15 - Conserving and enhancing the natural environment, notes that the planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services;
- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; And;
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

4.2 The London Plan

4.2.1 The London Plan (2016) forms the overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the capital until 2031. It forms part of the development plan for Greater London and London boroughs' local planning frameworks are required to be in general conformity. Relevant policies are listed below.

- Policy 3.2 'Improving health and addressing health inequalities' outlines that new developments should be designed, constructed and managed in ways

that improve health and promote healthy lifestyles to help to reduce health inequalities

- Policy 3.16 Protection and enhancement of social infrastructure states that development proposals which provide high quality social infrastructure will be supported in light of local and strategic needs assessments.
- Policy 3.18 Education facilities Development proposals notes that proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to educational purposes. Those which address the current projected shortage of primary school places will be particularly encouraged. Proposals which result in the net loss of education facilities should be resisted, unless it can be demonstrated that there is no ongoing or future demand.
 - It goes on to note that 'In particular, proposals for new schools should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations.
 - It also notes that 'Development proposals which maximise the extended or multiple use of educational facilities for community or recreational use should be encouraged.
- Policy 4.6 Support for and enhancement of arts, culture, sport and entertainment provision notes that boroughs and other stakeholders should support the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors.
- Policy 5.1 Climate Change Mitigation – The mayor seeks to achieve an overall reduction in London's CO2 emissions by 60% by 2025. Within LDF's boroughs should develop detailed policies and proposals that promote and are consistent with the achievement of the Mayor's strategic carbon dioxide emissions reduction target for London.
- Policy 5.2 Minimising carbon dioxide emissions - Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy:
- Policy 5.3 Sustainable Design and Construction – The highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments.
- Policy 5.7 Renewable energy - Within the framework of the energy hierarchy, major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible. Changes in this policy have introduced a target for the reduction of 35%
- Policy 5.10 Urban Greening – The Mayor will promote and support urban greening such as new planting in the public realm.

- Policy 5.11 Green roofs and development site environs notes that development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible.
- Policy 6.1 Strategic approach - encouraging patterns and nodes of development that reduce the need to travel, especially by car.
- Policy 6.9: Cycling. Developments should: a provide secure, integrated and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3 and provide on-site changing facilities and showers for cyclists.
- Policy 6.10 Walking attempts to bring about a significant increase in walking in London, by emphasizing the quality of the pedestrian and street environment, including the use of shared space principles – promoting simplified streetscape, de-cluttering and access for all.
- Policy 6.13 'Parking' seeks an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.
- Policy 7.3: Designing out crime. Development should reduce the opportunities for criminal behavior and contribute to a sense of security without being overbearing or intimidating.
- Policy 7.2 An inclusive environment requires all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that developments.
- Policy 7.6: Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context. Buildings and structures should be of the highest architectural quality, be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm. They should comprise details and materials that complement, not necessarily replicate, the local architectural character. Buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings. They should incorporate best practice in resource management and climate change mitigation and adaptation and provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces and be adaptable to different activities and land uses, particularly at ground level

4.3 Core Strategy

4.3.1 The Core Strategy was adopted on 6 April 2011. Relevant policies include;

4.3.2 Strategic Policy 1 – Sustainable development notes that development will improve the places we live and work in and enable a better quality of life for Southwark's diverse population. It will help meet the needs of a growing population in a way that respects the limits of the planet's resources and protects the environment.

4.3.3 Strategic Policy 2 Sustainable Transport – seeks to encourage walking, cycling and use of public transport rather than travel by car. This will be achieved through a number of actions including minimising car parking and maximising cycle parking within development proposals.

4.3.4 Strategic Policy 4 - Places to learn and enjoy - Encourages building new schools and improving existing schools to provide improved education opportunities and ensuring development provides for new school places to increase the provision of education

4.3.5 Strategic Policy 11 – Open spaces and wildlife approach will improve, protect and maintain a network of open spaces and green corridors that will make places attractive and provide sport, leisure and food growing opportunities for a growing population. We will protect and improve habitats for a variety of wildlife.

4.3.6 Strategic Policy 12 Design and Conservation – requires development to achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places.

4.3.7 Strategic Policy 13 High Environmental Standards – seeks achievement of very high sustainability targets including BREEAM; expecting all major developments to set up and/or connect to local energy networks where possible; and requiring developments to use low and zero carbon sources of energy.

4.3.8 Strategic Policy 14 Implementation and Delivery – seeks to ensure that the Councils objectives for further protecting, enhancing and regenerating Southwark are implemented through sufficient funding and effective consultation.

4.4 Saved Southwark Plan Policies

4.4.1 The Southwark Plan was adopted on 28 July 2007. This together with the Core Strategy provides the framework for all land use and development in Southwark

4.4.2 Policy 2.1 Enhancement of community facilities notes that planning permission for a change of use from D class community facilities will not be granted unless the applicant demonstrates that the community facility is surplus to requirements of the local community and that the replacement development meets an identified need; or there is another locally accessible facility with similar or enhanced provision can meet the identified needs of the local community facility users.

4.4.3 Policy 2.2 Provision of community facilities which seeks to ensure that new community facilities provided are able to be used widely and would not be detrimental to local amenity.

4.4.4 Policy 2.3 ‘Enhancement of educational establishments’ notes that Planning permission for a change of use from D class educational establishments will not be granted unless:

- i. Similar or enhanced provision within the catchment area is secured; and
- ii. Opportunities are taken wherever possible to ensure that provision is made to enable the facility to be used by all members of the community.

4.4.5 Policy 2.4 'Educational deficiency – provision of new educational establishments' notes that Planning permission will be granted for new educational establishments especially in areas of demonstrated educational deficiency provided:
i. Opportunities are taken wherever possible to ensure that provision is made to enable the facility to be used by all members of the community.

4.4.6. Policy 3.2 Protection of amenity which seeks to ensure that new development is not harmful to the local amenity.

4.4.7 Policy 3.4 Energy efficiency – All developments must maximise energy efficiency and to minimise and reduce energy consumption and carbon dioxide emissions.

4.4.8 Policy 3.6 Air quality notes that planning permission will not be granted for development that would lead to a reduction in air quality

4.4.9 Policy 3.7 Waste reduction – Developments are required to ensure adequate provision of recycling, composting and residual waste disposal, collection and storage facilities.

4.4.10 Policy 3.9 Water – Developments should incorporate measures to reduce the demand for water and recycle grey water and rainwater.

4.3.11 Policy 3.11 Efficient use of land notes that all developments should ensure that they maximise the efficient use of land.

4.3.12 Policy 3.12 Quality of design – developments should achieve a high quality of both architectural and urban design enhancing the quality of the built environment to create attractive, high amenity environments.

4.3.13 Policy 3.13 Urban design - states that principles of good design must be taken into account in all developments in designing new developments consideration must be given to landscaping - where appropriate developments should include landscape design that enhances the area and biodiversity.

4.3.14 Policy 3.14 Designing out Crime notes that development in both the private and public realm should be designed to improve community safety and crime prevention.

4.3.15. Policy 3.28 Biodiversity notes that the LPA will take biodiversity into account in its determination of all planning applications and will encourage the inclusion in developments of features which enhance biodiversity, requiring an ecological assessment where relevant.

4.3.16 Policy 4.6 Loss of residential accommodation notes that Development will not be permitted where it results in a net loss of residential floorspace, except where:

- i. The environment is unsuitable for housing or the existing standard of accommodation is unsatisfactory, and where improvements to overcome these problems are not possible; or
- ii. The residential accommodation is on a site which is designated for a different use in preference to housing; or

iii. The replacement of the existing residential floorspace would otherwise contravene one or more of the criteria i to vi in Policy 3.11 Efficient Use of Land and exceeds the densities in Appendix 2.

The policy goes on to note that there are some circumstances where the loss of housing might be acceptable, either because the standard of accommodation is poor, or because a reduction in the net residential floorspace would have wider benefits to the community.

4.3.17. Policy 4.7 Non self-contained housing for identified user groups notes that Appropriate new development or changes of use which provide non self-contained residential are appropriate provided that there is need, the site is suitable, the provision does not result in a loss of amenity, there is adequate infrastructure to accommodate the development and that the development provides an acceptable level of accommodation on site.

4.3.18. Policy 5.2 Transport impacts notes that planning permission will be granted for development unless there is an adverse impact on transport networks, Adequate provision has not been made for servicing, or consideration has not been given to the impacts on the bus priority network and the Transport for London road network.

4.3.19. Policy 5.3 Walking and cycling – Permission will be granted for development where it provides for pedestrians and cyclists within the surrounding area; there is good design location and access arrangements; the development contributes towards safe and secure walking and cycling routes and there is provision of convenient, secure and weatherproof cycle parking to the minimum cycle parking standards.

4.3.20. Policy 5.7 Parking Standards for Disabled People and the mobility impaired – developments (subject to site constraints) must provide adequate parking for disabled people and the mobility impaired.

4.5. New Southwark Plan Policies (Draft 2018)

4.5.1. The key policy within the emerging New Southwark Plan relates to emerging policy P23: Education places, outlines that Development of educational facilities will be permitted where proposals provide pre-school, school, higher and further education places to meet identified needs and where there are sports, arts, leisure, cultural or community facilities that are shared with local residents.

4.5.2. Other relevant policies include:

P12: Design quality

P15: Efficient use of land

P42: Healthy developments

P43: Leisure, arts and culture

P44: Community uses

P46: Public transport

P47: Highways impacts

P48: Walking

P50: Cycling

P52: Car parking

P53: Parking standards for disabled people and mobility impaired people

P54: Protection of amenity
P55: Designing out crime
P56: Open space
P58: Green infrastructure
P59: Biodiversity
P60: Trees
P61: Environmental standards
P62: Energy
P63: Reducing waste
P65: Environmental protection
P66: Improving air quality
P67: Reducing noise pollution and enhancing soundscapes
P68: Reducing water use
P69: Reducing flood risk

4.6 Supplementary Planning Guidance

4.5.1 The following Supplementary Planning Guidance is relevant to the proposed developments:

- Sustainable Design and Construction – February 2009
- Sustainable Transport – March 2010
- Canada Water AAP (Area Action Plan) 2012 – Policy 26 Schools, outlines Southwark's plan to deliver improvements to schools by working with our partners to:
 1. Provide additional places at primary schools to meet anticipated demand for increased pupil places.
 2. Support and encourage schools to promote and provide services for the community.
 3. Rebuild and refurbish existing schools to improve educational opportunities.

5.0 Planning Considerations

5.0.1. This section outlines and assesses the key planning issues that are related to the proposed development.

5.1 Land Use Principle

5.1.1. The NPPF states that "Development that is sustainable should go ahead, without delay – a presumption in favour of sustainable development that is the basis for every plan, and every decision". As noted, local Southwark Plan policies aim to provide new and enhanced education facilities with the aim of meeting the education space deficiency, particularly with regard to primary school spaces within the borough.

5.1.2. This is supported by policy 3.18 of the London Plan which advises that new schools/expansion of existing schools should 'be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations'.

5.1.3 The Canada Water Action Area Plan sets out the need for new school places within the surrounding area, with this document outlining the potential for Rotherhithe Primary School to cater for a secondary school within the site. However, a recent

cabinet paper has been published that has noted that the council anticipates the greatest need for additional school places in the short to medium term to fall into two discreet areas of Bermondsey and Rotherhithe.

5.1.4. Furthermore, the paper noted that, following an analysis of application and enrolment trends, and projected future need, the council ascertained that Rotherhithe Primary School would be suitable for expansion as a primary school. Presently the school is a 2FE school housed in a variety of (mostly) temporary buildings in a poor state of repair. The expansion would take the school to 3FE. Cabinet approval was sought and given in July 2015 to proceed to formal consultation for the expansion of the school. The report goes on to note that the Old Kent Road Action Area Plan will give consideration for future Secondary schools within this area.

5.1.5. As saved policy 2.4 'Educational deficiency – provision of new educational establishments' notes, Planning permission will be granted for new educational establishments especially in areas of demonstrated educational deficiency provided opportunities are taken to ensure wider community use within the site. Provision will be made for the hall and MUGA to be used for community uses outside the hours of the schools operation in line with this policy and thus this requirement is met.

5.1.6. Emerging Policy 23 outlines that development should not lead to a net loss of existing educational facilities, and whilst the site subject to the application is a reduction in size of the existing school as a result of a potential future development site to the southern end of the site, given the proposed redevelopment of the school will rationalize the buildings on site as a result of the reduction in sprawl of the existing single storey buildings, the proposal results in an improvement to the overall outdoor space consolidating it within the remainder of the site.

5.1.7. The proposal would provide sufficient floor space for teaching, halls, dining, physical education, staff and administration activities, storage, toilets and personal care and kitchen facilities as well as providing a separate access for the MUGA and other community facilities consolidated within the site, thus in accordance with the relevant policies.

5.1.8. As such, overall, the principle of the proposed development is considered consistent with the NPPF, Saved Policy 2.4 of the Southwark Plan, 3.18 of the London Plan and Emerging Policy 23 of the New Southwark Plan, provided there are no demonstrable negative local impacts which cannot be addressed through the appropriate use of planning conditions or obligations'

5.1.9. Provided there are no significant negative impacts on the amenity of surrounding occupiers, or impact on the character or appearance of the building or setting within the wider area, the principle of the development would be considered acceptable.

5.2 Environmental Impact Assessment.

5.2.1. Applications where an EIA is required will either be mandatory or discretionary, depending on whether they are found in Schedule 1 (mandatory) or Schedule 2 (discretionary) of the 2017 Regulations. The urban nature of the site means that it could fall within a 'urban development project' as outlined within the Regs.

5.2.2. The threshold for 'urban development projects' is an area exceeding 0.5ha. However, an EIA is only required if the site is located within a sensitive area or the proposals are likely to generate significant environmental effects.

5.2.3. In this case, the proposal for an extension to the School and the application site is less than 0.5 Hectares and thus is not considered an EIA development.

5.2.4. Given the scale of the proposed development, it is not considered that the development would result in significant environmental impact concerns to an extent and thus it is not considered that an EIA would be required for this development. Any site specific environmental concerns will be addressed as part of the ecology and replanting schemes.

5.3 School Amenity Space and landscaping

5.3.1 The proposed site is a new school building which gives positive opportunities to provide an enhanced play area when compared to the existing school site.

5.3.2. The proposal will offer high quality outdoor space at ground floor. A range of quality outdoor spaces will be provided, including separate play space for nursery and reception classes, key stage 1 and 2 play area, new hard surfaced play area including landscaped amphitheatre and a new floodlit MUGA. All ground floor classrooms have access to covered links and play areas to allow use of the outdoor spaces throughout the year.

5.3.3. Whilst it is acknowledged that the outdoor space within the development is a reduction from the existing, overall, the proposal will provide a high quality outdoor amenity space for the children which will be a positive environment to both learn and play within. With the overall space, it is considered that there will be sufficient space to support the expansion of the school to support a three form entry primary school on this site and as such meet the requirements of the school and relevant planning policy.

5.4 Daylight & Sunlight

5.4.1 The Daylight and Sunlight reports accompanying the application demonstrate that the design of the Scheme in terms of height, massing and spacing, would not result in a significant impact on the surrounding properties. Further details of this are shown in the submitted Daylight/Sunlight Assessment.

5.4.2. 15 windows within the block at 1-37 Canute Gardens would fall slightly below the BRE standards in terms of the Vertical Sky Component analysis, however these would only fall slightly below 0.8 times their former value (0.73-0.79) and as such the impacts would not be considered significant. Two windows would fail the VSC analysis within 59 Hawkstone Road, however the rooms in which these are sited would both pass the Daylight Distribution test and as such it is not considered that these rooms would noticeably be impacted upon.

5.5 Air Quality

5.5.1 An Air Quality assessment of the proposed development has been undertaken by Waterman consultants and is submitted in support of this application. It is acknowledged that the site is located within an Air Quality Management Area (AQMA) and as such it has been deemed necessary to provide this assessment. The Assessment concludes that provided that the proposed construction mitigation

measures are carried out there will be no air quality issues as a result of the proposed development. The air quality issues are explored in more detail within the report submitted with this application.

5.6 Outlook, Overlooking, Noise and Privacy

5.6.1. The proposed new school building is situated towards the northwestern edge of the site along Hawkstone Road in order to provide a new civic frontage. Southwark Park lies on the opposite side of Hawkstone Road. The closest residential properties to the new building are located on the junction of Hodnet Grove and Hawkstone Road within the Duke of Suffolk House. Whilst the proposed school building would be within a close proximity to this, the building has been designed in order to minimize the impacts on these properties by lowering the scale to single storey at its closest point in order to ensure that there are no significant impacts in terms of outlook or sense of enclosure on these properties

5.6.2. In terms of overlooking, the closest properties are situated next door to the site at no.59 Hawkstone Road, however adjacent to these building, the proposed school would drop to single storey and as such any windows would be at ground floor only. As these would be situated behind the boundary wall, no overlooking or impacts on outlook would occur.

5.6.3. In terms of overlooking into the properties within Canute Garden, the proposed building would be situated in excess of 21m from habitable windows and as such there would not be any significant mutual overlooking between the residential units or the school building. In terms of outlook, given the separation distances, these would not result in any impacts on these properties.

5.6.4. In terms of potential noise from the school affecting the amenity of the nearby residential properties, the site is currently an existing school site and as such there is existing noise within coming from the site. The proposal will introduce a new primary school which will increase the existing size and as such there is likely to be some increased noise levels within the area as a result of children playing within the site. The background noise survey outlines that the background noise levels around the site are approximately 64-68dB. Any plant would accord with Southwark' s policy of 10dB below background noise levels.

5.6.5. The proposal results in both a ground level playground with MUGA which may increase the level of noise into the neighboring properties as it is raised and thus there could potentially be more sound creep. However, given the existing school site which also contains a MUGA, it is not considered that this addition will significantly raise the daytime noise levels to an extent to warrant refusal.

5.6.6. Furthermore, generally the MUGA will be used by the school between the hours of 9am and 4pm and as such the use of the MUGA will not result in significant noise levels at anti-social hours. Whilst it is proposed that the MUGA would be floodlit and may be used for the community within the area, it is not proposed to use this at anti-social hours. As such, it is considered that a condition could be attached to any permission which limits the time in which the MUGA can be used. It will be accessed through the site and will also be locked as to ensure that it could not be used at anti-social hours and thus will limit any potential amenity impacts on local residents.

5.6.7. Overall, it is considered that the proposed development would not result in any material increased impacts on the neighboring amenities in terms of noise,

overlooking. As such it is considered that it accords with Saved Policy 3.2 of the Southwark Plan and strategic policy 13 High Environmental standards of the Core Strategy.

5.7 Design

5.7.1 Saved Southwark Plan Policy 3.12 'Quality in Design' notes that new buildings should embody a creative and high quality appropriate design solution, specific to their site's shape, size, location and development opportunities and where applicable, preserving or enhancing the historic environment. The proposed scheme involves the addition of a high quality contemporary building to a recently developed site, whilst respecting the existing local context. The application site does not fall within a Conservation Area and it is not within the setting of any listed buildings or other heritage assets.

5.7.2. A comprehensive explanation of the design rationale is explained in detail within the Design and Access statements which are submitted in support of this application however the below section provides a summary of the design of the proposed development.

5.7.3. The development consists of the demolition of the existing building and the erection of a new two storey building to contain a three Form entry primary school. The development has been carefully designed so that it is of a very high standard of design and quality, and is considered to be compatible with and respects the scale and character of the buildings within the surrounding area. The scale of the building at two stories in height would be similar or smaller in height to the residential properties within the surrounding streets and thus would sit comfortably within its setting.

5.7.4. This location of the new building has been carefully chosen to have the minimum impact on the street scene Hawkstone Road whilst also providing a strong civic presence for the school within the area, which would be a significant improvement on the existing situation.

5.7.5. A single storey entrance block would be proposed and would front onto Hawkstone Road with the School hall situated adjacent to this. A U-shaped two storey block would then be constructed around an internal courtyard over two floors in order to provide the teaching class rooms.

5.7.6. The building proposes a simple, but robust palette of brickwork and large areas of glazing with brick detailing throughout in order to provide articulation and visual interest into the building.

5.7.7. The main internal courtyard provides an opportunity for a colourful and expressive learning environment with detailed landscaping around an existing tree and the introduction of an amphitheater in order to provide performance space within the courtyard.

5.7.8. The use of these robust and contemporary materials is welcomed and the proposed materials have been chosen carefully so they work well with and compliment the site of the building and surrounding area. The design effectively integrates into the existing built form and public realm and will meet high standards of sustainability and minimises any effect upon residential amenity.

5.7.9. The design of the scheme is consistent with the policies of national and borough planning guidance. The proposed development will be of a high quality, high density proposal which integrates and respects the existing townscape, thereby making best use of the site, in compliance with NPPF, The London Plan, policies within the Core Strategy and Saved Southwark Plan Policies.

5.8 Transport

5.8.1. A full analysis of the proposal in light of the relevant transport consideration has been undertaken by MLM Consultants. Their conclusions and recommendations are outlined within their Transport Statement, which is included as part of the planning application submission. A School Travel Plan has also been included which notes that all users of the school will be promoted to use sustainable modes of transport.

5.8.2. The proposed development benefits from good levels of public transport accessibility with a PTAL of 5, with good pedestrian and cycling links to the site. As mentioned, a reduction in parking is proposed within the site to provide only 4 parking spaces, two of which would be disabled bays. A public realm/highway plan will be submitted with the application showing the proposed highway works.

5.8.3. The proposal proposes both cycle and scooter storage for the additional school spaces with 36 cycle parking and 40 scooter parking spaces will be provided for pupils. 22 spaces will be provided for staff and 12 spaces for visitors.

5.8.4 Adequate provision for the storage and collection of refuse and recycling waste has been provided within the scheme with access from the highway along Hawkstone Road and wheeled onto the highway for collection. As such the scheme would meet the Saved Southwark Plan Policy 3.7. The highways implications are minimal and the servicing of the site can be accommodated without comprising the amenity of local residents.

5.8.5. Delivery vehicles for the school including kitchen deliveries will serve the site from Hawkstone Road which would require refuse collection vehicles to park on-street in a new dedicated bay which has been designed in discussion with the Councils Highways team. This will allow for the efficient collection of refuse etc. All servicing and deliveries will be managed by the school to occur outside of drop-off/pick-up hours where possible.

5.8.6. Covered and secure cycle/scooter parking is to be provided in accordance with minimum cycle standards to cater for the proposed maximum pupil roll of 630 pupils. Consideration should be given to extending the proposed cycle/scooter parking arrangements as demand grows. Most of this cycle storage will be located within the site which will be secure and weatherproof with good access to the exits within the site. Staff cycle storage will be provided in a lockable covered store with some visitor parking situated close to the main school entrance.

5.8.7. A small portion of children come to school via car and as such the projected increase in children attending the new school is unlikely to significantly increase the amount of cars dropping off at the site. The school travel plan will encourage all

users of the site to use alternative means of travel. The low number of drop offs does not raise any *significant concerns in relation to highway safety*.

5.9 Trees

5.9.1. As part of the proposal a number of trees are required to be removed within the site in order to allow for the school building to be erected and for the MUGA to be installed within the site.

5.9.2. A tree assessment has been undertaken noted that a total of 24 existing trees and 1 group will require removal to facilitate development. Of these, 10 are category B and 14 are category C. Design proposals include planting of 46 new trees replacing those to be removed at a rate of nearly 2 for 1. A minimum of 10 of the new trees will be planted as semi mature to mitigate the loss of existing category B trees.

5.9.3. As many trees have been retained as possible in order to deliver the school building on site with a comprehensive new landscaping and tree planting scheme is proposed as part of the scheme. Details are provided on the submitted tree plans.

5.10 Wildlife

5.10.1. An ecology report has been prepared alongside this submission by the Ecology Consultancy. This report outlines in detail the potential ecological issues including potential habitats that the site may contain however these are summarised below.

5.10.2. The report notes the site was unsuitable to support roosting bats and any other protected or noteworthy species. However it did note that there was potential presence of breeding birds will require mitigation measures to be undertaken at the site in order to ensure compliance with protected species

5.10.3. The report recommends that Habitats on site (scattered trees, introduced shrub and scrub) were considered likely to support common nesting bird species. Any vegetation clearance on site must be carried out outside of the main bird nesting season (March to August, inclusive) to avoid any potential offences relating to nesting birds.

5.11 Sustainability

5.11.1 The National Planning Policy Framework (NPPF) sets out that planning has a key role to play in meeting the challenge of climate change, through securing radical reductions in greenhouse emissions, through providing resilience to climate change and by supporting the delivery of renewable and low carbon energy.

5.11.2. London Plan policy 5.2 stipulates that in order to make the fullest contribution to minimising carbon dioxide emissions, developments should employ the following energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy). The policy requires a 35% reduction below 2013 Building Regulations and is required for the sites over 1000sqm. Policy 5.7 also states that for major developments, this should incorporate the use of on-site renewable energy generation, where feasible.

5.11.3. An energy statement has been submitted alongside this application which notes that these requirements will be met and as such the application meets the current relevant London standards as outlined within the London Plan 2016.

5.11.4 Further, a BREEAM pre-assessment accompanies the application. It demonstrates how the proposed development responds appropriately to the energy policies within the NPPF, London Plan, Core Strategy and Southwark Plan as the extension area of the school building would be designed to achieve BREEAM 'Very Good' which would be in compliance with the current guidance within the Southwark Core Strategy.

5.12 Planning Obligations

5.12.1 Saved policy 2.5 of the Southwark Plan advises that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. This policy is reinforced by the Supplementary Planning Document (SPD) for Section 106 Planning Obligations, which sets out in detail the type of development that qualifies for planning obligations, and Circular 05/05, which advises that every planning application will be judged on its own merits against relevant policy, guidance and other material considerations when assessing planning obligations.

5.12.2 Education (D1) use is not subject to the standard charge planning obligations listed in the SPD on Section 106 Planning Obligations. Despite this, planning obligations listed can still be necessary if a development, when considered on its merits, would result in negative impacts. In this case, the proposed design and operation of the development would largely ensure that its' impacts are internalised to the site or would be of a nature and scale that do not warrant planning obligations and can be appropriately mitigated by way of condition.

5.12.3. In terms of the proposals here, initial discussions have been had with transport and highway officers and it was agreed that some works would be required in terms of signage/road markings to the new school site, whilst also introducing a crossing point and as such a legal agreement may be required in order to secure this use and transfer any management of the land to the highways authority. Further, as there is a community use proposed within the hall and MUGA, this may also be required to be secured by way of a condition or S106 legal agreement.

5.12.4 The site would not be subject to pay any CIL fees as it is an educational establishment and thus is exempt from the need to pay the levy.

5.13. Flood Risk

5.13.1. The site is located within Flood Zone 3, and the site is protected by the Thames Barrier and related defenses. A Flood Risk Assessment (FRA) has been submitted with the application which notes that the development will be deemed acceptable based on the wider community and economic benefits it creates when compared to the flood risk. On the basis of the above, the proposal is considered consistent with policy 3.31 of the Southwark Plan and National Planning Policy Framework.

6.0 Conclusion

6.1.1 This application has been subject to detailed consultation both with the public, as set out in the accompanying Design and Access Statements and with Council

officers. It is considered that the scheme has sought to address concerns, whilst meeting the requirements of national and local policy.

6.1.2 Increasing Primary School places within London is a key priority as outlined London Plan, which notes that applications for new schools should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school.

6.1.3 Overall, it is considered the development proposal strongly reflects national policy objectives for effective and efficient use of land, whilst providing increased access to education establishments without resulting in any significant negative local impacts within the surrounding area.

6.1.4 The proposed design of the school will be of a high quality and should meet high standards of sustainability. The BREEAM pre-assessment report submitted with this application concludes that the extension to the new primary school will meet BREEAM Very Good. The submitted Energy Statement also concludes that the London Plans requirement in carbon reductions and renewable energies on site is met.

6.1.5 The scheme has been designed to address issues associated with bulk and height and to respect the local context of scale and massing in the area. A comprehensive explanation of the design rationale and impact on area is contained within the Design and Access statements which are submitted in support of this application.

6.1.6. The proposal would provide an accessible educational facility and the design of the school buildings would not be out of character with the surrounding area or significantly detrimental to the amenity of the area or nearby occupiers. As outlined above, the development of the new school on the site is supported by the saved policies in the Southwark Plan, policies in Southwark's Core Strategy, the London Plan and the NPPF.